

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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WEATHERFORD INTERNATIONAL, LLC;  
WEATHERFORD/LAMB, INC.;  
WEATHERFORD US, LP; and WEATHERFORD  
ARTIFICIAL LIFT SYSTEMS, LLC  
Petitioners

v.

PACKERS PLUS ENERGY SERVICES INC.,  
Patent Owner

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Case IPR2016-01509  
Patent 7,861,774

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**EXCLUSIVE LICENSEE RAPID COMPLETIONS LLC'S MOTION FOR  
OBSERVATION ON THE CROSS EXAMINATION**

According to Petitioners, “multi-stage open-hole fracturing [“OHMS”] was prevalent by 2001.” Reply at 1. Dr. Rao testified:

Q. Well, what I'm asking is this hypothetical person of skill in the art, would they have thought it was obvious prior to 2001 to do open hole multistage fracturing?

A. The -- the obvious part throws me because I don't what you mean by it was obvious. If somebody wished to do multistage fracturing, then - - then they could read Thomson. And Thomson did -- Thomson did multistage fracturing. **So there was literature available to the POSITA to do such a thing, but the motivation by and large was not there.**

Ex. 2101 at 13:11-24 (emphasis added).

Dated: October 20, 2017

Respectfully submitted,

*Rapid Completions LLC*

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**CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (e)(4)**

The undersigned hereby certifies that the foregoing document was served via electronic mail, as previously consented to by Petitioner upon the following counsel of record:

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