

Justin Nemunaitis

From: Eric Green <egreen@McKoolSmith.com>
Sent: Monday, July 11, 2016 7:02 PM
To: Justin Nemunaitis
Cc: rapid@caldwelcc.com; Baker Hughes; Leslie V. Payne (lpayne@hpcllp.com); Chris First <cfirst@hpcllp.com> (cfirst@hpcllp.com); dwilson@hpcllp.com; peak.counsel@raleybowick.com; 'Tim Johnson' (tim.johnson@peakcompletions.com)
Subject: BH/RC: Invalidity Contention Supplementation

Follow Up Flag: Follow up
Flag Status: Flagged

Justin,

As a courtesy, I write to inform you that the Defendants are planning to update our invalidity contentions to include certain prior art references that were recently disclosed by Packers Plus in connection with the 501 patent. Additionally, we plan to amend to include prior art that was only recently located. We also plan to supplement with prior art that relates to positions taken by Rapid Completions in its recent IPR filings. The additional art includes, but is not necessarily limited to:

- US 2,537,066 (Grant)
- US 3,289,762 (Schell)
- US 1,510,669 (Halliday)
- US 2387003 (Barnes)
- US 2307983 (Barnes)
- SPE 19090
- SPE 17759
- SPE 18249
- SPE 17760
- SPE 16681
- SPE 16410
- The Composite Catalog of Oil Field and Pipe Line Equipment, 21st 1956-57 Edition, Volume 2, published by World Oil
- The Lane Wells Tubing Port Valve, as described in various Lane Wells publications that have recently been produced
- Lane Wells Packers described in various Lane Wells publications that have recently been produced
- The Composite Catalog of Oil Field Equipment and Services, 26th 1964-65 Edition, Volume 2, published by World Oil
- Lynes inflatable packers, including the Lynes Inflata-Plug, Lynes Production-Injection Packer, Lynes Open Hole Packer, and Lynes Straddle Packer

Our search efforts are ongoing, and we reserve the right to add additional art as it becomes available and after our review of Rapid Completions' supplements to its infringement contentions as ordered by the Court.

Regards,

Eric

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