

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

**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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***Inter Partes* Review No. IPR2016-01517  
Patent 7,134,505**

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**PETITIONERS' REPLY**

**TABLE OF AUTHORITIES**

*Brown & Williamson Tobacco Corp. v. Philip Morris*, 229 F. 3d 1120 (Fed. Cir. 2000)  
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*Graham v. John Deere Co. of Kansas City*, 383 US 1, 36 (1966).....17

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*Power-One, Inc. v. Artesyn Technologies, Inc.*, 599 F. 3d 1343 (Fed. Cir. 2010) .....24

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**Exhibit List**

<b>Exhibit</b>	<b>Description</b>
1001	U.S. Patent No. 7,134,505 ("the '505 Patent")
1002	A.B. Yost, II, et al. <i>Production and Stimulation Analysis of Multiple Hydraulic Fracturing of a 2,000-ft Horizontal Well</i> , SPE (Society for Petroleum Engineering) 19090 (1989) ("Yost")
1003	D.W. Thomson, et al., <i>Design and Installation of a Cost-Effective Completion System for Horizontal Chalk Wells Where Multiple Zones Require Acid Stimulation</i> , SPE (Society for Petroleum Engineering) 37482 (1997) ("Thomson")
1004	B. Ellsworth, et al., <i>Production Control of Horizontal Wells in a Carbonate Reef Structure</i> , 1999 Canadian Institute of Mining, Metallurgy, and Petroleum Horizontal Well Conference ("Ellsworth")
1005	Declaration of Rebekah Stacha of the Society of Petroleum Engineers
1006	Affidavit of Roberto Pellegrino
1007	Declaration of Vikram Rao
1008	Transcript of Continued Deposition of Daniel Jon Themig – 01/08/2007
1011	Affidavit of Kevin Trahan
1012	Expert Report of Kevin Trahan
1013	First Supplemental Expert Report of Kevin Trahan
1014	Supplemental Engineering Report Prepared by Ronald A. Britton, P.E.
1015	U.S. Provisional Application No. 60/404,783
1016	U.S. Patent No. 3,062,291 to Brown
1017	U.S. Patent No. 2,738,013 to Lynes
1018	U.S. Patent No. 4,224,987 to Allen
1019	U.S. Patent No. 6,006,838 to Whiteley et al.
1020	Prosecution History of U.S. Patent No. 7,861,774
1021	Prosecution History of U.S. Patent No. 7,543,634
1022	Prosecution History of U.S. Patent No. 7,134,505
1023	Prosecution History of U.S. Patent No. 6,907,936
1024	U.S. Provisional Patent Application No. 60/331,491 filed on November 19, 2001.
1025	Hart Petroleum Volume 71, Number 6, June 1998
1026	Declaration of Christopher D. Hawkes, Ph.D., P.Geo.
1027	Declaration of Christopher D. Hawkes, Ph.D., P.Geo.

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