

UNITED STATES PATENT AND TRADEMARK OFFICE

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

Case IPR2016-01517
Patent 7,134,505

**EXCLUSIVE LICENSEE RAPID COMPLETIONS LLC'S
REPLY TO ITS MOTION TO EXCLUDE**

Mail Stop "PATENT BOARD"
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Contrary to statements made in their motion to exclude (e.g., Paper 44 at 7), Petitioners now correctly note that an objecting party bears the burden of proof in an IPR, and that it must meet that burden with a thorough explanation of the objection. Moreover, according to Petitioners, a paralegal can provide sufficient testimony to overcome authentication and hearsay objections. These arguments highlight some of the problems with Weatherford's and Baker Hughes's authentication and hearsay objections. Accordingly, to the extent the Board overrules their hearsay and authentication objections that have been asserted without a detailed explanation or that are based on alleged deficiencies in the declarations offered by Rapid Completions, Rapid Completions withdraws the present motion.

Dated: October 19, 2017

Respectfully submitted,

Rapid Completions LLC

By /Justin T. Nemunaitis/

Hamad M. Hamad, Reg. No. 64,641

Bradley W. Caldwell (*pro hac vice*)

Justin T. Nemunaitis (*pro hac vice*)

CALDWELL CASSADY CURRY,
P.C.

2101 Cedar Springs Road, Suite 1000

Dallas, Texas 75201

Telephone: 214.888.4848

Facsimile: 214.888.4849

hhamad@caldwellcc.com

bcaldwell@caldwellcc.com

jnemunaitis@caldwellcc.com

rapid@caldwellcc.com

Dr. Gregory Gonsalves, Re. No.
43,639

GONSALVES LAW FIRM

2216 Beacon Lane

Falls Church, Virginia 22043

Telephone: 571.419.7252

gonsalves@gonsalveslawfirm.com

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:

Jason Shapiro (Lead Counsel)
Patrick Finnan (Back-up Counsel)
EDELL, SHAPIRO & FINNAN,
LLC
js@usiplaw.com
pjf@usiplaw.com
epatent@usiplaw.com

Date: October 19, 2017

/Hamad M. Hamad/
Hamad M. Hamad, Reg. No. 64,641