

THE PARTIES

1. Plaintiff Rapid Completions LLC is a limited liability company organized and existing under the laws of the State of Texas, and maintains its principle place of business at 2400 Dallas Parkway, Suite 200, Plano, Texas 75093.
2. Defendant Baker Hughes Incorporated is a Delaware corporation, and maintains its principle place of business at 2929 Allen Parkway, Suite 2100, Houston, Texas 77019. Baker Hughes Incorporated has designated CT Corporation System, 1999 Bryan St., Ste. 900, Dallas, TX 75201 as its agent for service of process.
3. Defendant Baker Hughes Oilfield Operations, Inc. is a Delaware corporation, and maintains its principle place of business at 2929 Allen Parkway, Suite 2100, Houston, Texas 77019. Baker Hughes Oilfield Operations, Inc. has designated CT Corporation System, 1999 Bryan St., Ste. 900, Dallas, TX 75201 as its agent for service of process.
4. Defendant Weatherford International plc is an Irish corporation, and maintains its principle place of business at Bahnhofstrasse 1, 6340 Baar, Switzerland, CH 6340. Defendant Weatherford International plc has designated Christina M. Ibrahim Executive Vice President, General Counsel and Corporate Secretary, Weatherford International plc, 2000 St. James Place, Houston, Texas 77056 and Jonathan B. Newton, Baker & McKenzie LLP, 700 Louisiana, Ste. 3000, Houston, Texas 77002 as its agents for service of process.
5. Defendant Weatherford International, LLC is a Delaware limited liability company, and maintains its principle place of business at 2000 St. James Place, Houston, Texas 77056. Weatherford International, LLC has designated CT Corporation System, 1999 Bryan St., Ste. 900, Dallas, TX 75201 as its agent for service of process.

6. Defendant Weatherford/Lamb, Inc. is a Delaware corporation, and maintains its principle place of business at 2000 St. James Place, Houston, Texas 77056. Weatherford/Lamb, Inc. has designated CT Corporation System, 1999 Bryan St., Ste. 900, Dallas, TX 75201 as its agent for service of process.
7. Defendant Peak Completion Technologies, Inc. is a Texas corporation and maintains its principle place of business at 7710 Hwy. 80 West, Midland, Texas 79706. Peak Completion Technologies, Inc. has designated Timothy W. Johnson, 700 Louisiana St., Ste. 4900, Houston, TX 77002 as its agent for service of process.
8. Defendant Pegasi Energy Resources Corporation is a Nevada corporation, and maintains its principle place of business at 218 N. Broadway, Ste. 204, Tyler, Texas 75702. Pegasi Energy Resources Corp. has designated CT Corporation System, 1999 Bryan St., Ste. 900, Dallas, TX 75201 as its agent for service of process.
9. Defendant Pegasi Operating, Inc. is a Texas corporation, and maintains its principle place of business at 218 N. Broadway, Ste. 204, Tyler, Texas 75702. Pegasi Operating, Inc. has designated CT Corporation System, 1999 Bryan St., Ste. 900, Dallas, TX 75201 as its agent for service of process.
10. Defendant TR Rodessa, Inc. is a Texas corporation, and maintains its principle place of business at 218 N. Broadway, Ste. 204, Tyler, Texas 75702. TR Rodessa, Inc. has designated CT Corporation System, 1999 Bryan St., Ste. 900, Dallas, TX 75201 as its agent for service of process.

JURISDICTION AND VENUE

11. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1 *et seq.* This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

12. This Court has personal jurisdiction over Baker Hughes, Weatherford, Peak, and Pegasi (collectively, “Defendants”).
13. Defendants Baker Hughes, Weatherford, and Peak conduct business and have committed acts of patent infringement, induced acts of patent infringement by others, contributed to patent infringement by others, and/or advertised infringing products in this district, the State of Texas, and in the United States.
14. Defendant Pegasi conducts business and has committed acts of patent infringement in this district, the State of Texas, and in the United States.
15. On information and belief, Defendants each operate at least one office in this district.
16. On information and belief, Baker Hughes, Weatherford, and Peak transport infringing products, and or products used to contribute to the infringement of others throughout this district, and/or they place those products in the stream of commerce with the expectation that they may be sold, offered for sale, or sold in this forum.
17. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391 and 1400(b) because, among other things, Defendants are subject to personal jurisdiction in this district, Defendants have regularly conducted business in this judicial district, and certain of the acts complained of herein occurred in this judicial district.

PATENTS-IN-SUIT

18. The United States Patent and Trademark Office (“PTO”) duly and legally issued U.S. Patent Nos. 6,907,936 (“the ’936 Patent”), 7,134,505 (“the ’505 Patent”), 7,543,634 (“the ’634 Patent”), 7,861,774 (“the ’774 Patent”), 8,657,009 (“the ’009 patent”) (collectively, “the Patents-in-Suit”). Attached as Exhibits A-E.
19. Rapid Completions is the exclusive licensee for the Patents-in-Suit and possesses all rights of recovery.

20. Rapid Completions incorporates the Patents-in-Suit herein by reference.

FACTUAL ALLEGATIONS

21. The Patents-in-Suit generally cover methods and apparatuses for oil and gas wellbore fluid treatments. They describe, inter alia, various packers for sealing portions of the wellbore and sliding sleeves, which can be opened or closed to control fluid movement into and out of a tubing string placed in the wellbore.
22. The Patents-in-Suit also describe various methods for employing these tools in order to fracture formations and increase oil and gas production. The Patents-in-Suit describe, inter alia, isolating portions of the wellbore using packers or other isolation methods, and then opening one or more sliding sleeves using a ball or other opening device to selectively fracture a portion of a formation (“Sliding Sleeve Fracking Methods”).
23. The Patents-in-Suit were initially developed and owned by Packers Plus Energy Services Inc. (“Packers Plus”).
24. Packers Plus has in the past and currently makes and sells tools and sells and performs services that practice one or more claims of the Patents-in-Suit.
25. Packers Plus patents have been mentioned in news articles relating to Packers Plus and its efforts to protect its intellectual property.
26. In the early 2000s, former Packers Plus employees Ray Hofman, Leon McIntosh, and Sloane Muscroft left Packers Plus and began working for Peak.
27. On information and belief, Messrs. Hofman, McIntosh, and Muscroft were aware and/or should have been aware of Packers Plus patents, patent applications, and/or efforts to patent the technology described in the Patents-in-Suit.
28. The Patents-in-Suit are also available over the Internet through various online resources such as Google Patents and the U.S. Patent Office website.

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