

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BAKER HUGHES INCORPORATED and
BAKER HUGHES OILFIELD OPERATIONS, INC., Petitioners

v.

PACKERS PLUS ENERGY SERVICES INC.,
Patent Owner

Case IPR2016-01517
Patent 7,134,505

DECLARATION OF MICHAEL P. DELANEY

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

I, the below-named Declarant, state as follows:


1. My name is Michael P. Delaney, and I reside in Dallas, Texas.
2. I am a paralegal at the law firm of Caldwell, Cassady and Curry P.C.
3. Attached as Exhibit 2021 is a true and correct copy of Complaint, Rapid Completions LLC v. Baker Hughes, et al., filed July 31, 2015
4. Attached as Exhibit 2022 is a true and correct copy of Defendants' Invalidity Contentions cover document, served January 19, 2016.
5. Attached as Exhibit 2023 is a true and correct copy of Thomson invalidity contention chart, U.S. Patent 7,861,774.
6. Attached as Exhibit 2024 is a true and correct copy of an email to defense counsel transmitting Plaintiff's Infringement Contentions on November 23, 2015.
7. Attached as Exhibit 2025 is a true and correct bates-stamped copy of D. W. Thomson, "Design and Installation of a Cost Effective Completion System for Horizontal Chalk Wells Where Multiple Zones Require Acid Stimulation", (1997) as served on defendants on November 23, 2015.
8. Attached as Exhibit 2026 is a true and correct bates-stamped copy of A.B. Yost, "Production and Stimulation Analysis of Multiple Hydraulic Fracturing of a 2,000-ft Horizontal Well" (1989) as served on defendants on November 23, 2015.
9. Attached as Exhibit 2027 is a true and correct screenshot of the metadata for Defendants' initial invalidity contentions, dated January 19, 2016.

10. Attached as Exhibit 2028 is a true and correct copy of a list of attorneys docket sheet from Case No. 6:15-cv-00724; Rapid Completions v. Baker Hughes et al.
11. Attached as Exhibit 2030 is a true and correct copy of Defendants' Second Amended Invalidity Contentions, served August 11, 2016.
12. Attached as Exhibit 2031 is a true and correct screenshot of the metadata for the Yost Invalidity Charts attached to Defendants' amended invalidity contentions, dated August 11, 2016.
13. Attached as Exhibit 2032 is a true and correct copy of U.S. Patent 7,861,774 - Yost invalidity chart, served August 11, 2016
14. Attached as Exhibit 2033 is a true and correct copy of U.S. Patent 7,861,774 - Lane-Wells invalidity chart, served August 11, 2016.
15. Attached as Exhibit 2034 is a true and correct copy of an email from counsel for Baker Hughes Eric Green email to Justin Nemunaitis, dated July 11, 2016.
16. Attached as Exhibit 2035 is a true and correct copy of Weatherford's letter brief regarding Motion for Summary Judgment of Indefiniteness, dated September 20, 2016.
17. Attached as Exhibit 2036 is a true and correct copy of Baker Hughes' letter brief regarding Motion for Summary Judgment of Indefiniteness, dated September 20, 2016.
18. Attached as Exhibit 2037 is a true and correct copy of an email from Justin Nemunaitis to counsel for Weatherford Leslie Payne, dated September 19, 2016.
19. Attached as Exhibit 2038 is a true and correct copy of Weatherford's Expedited Motion to Stay Pending *Inter Partes* Review Proceedings, filed September 13, 2016

Further, Declarant sayeth not.

I, the above-named Declarant, hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States.

Date: November 25, 2016



Signature of Declarant
Michael P. Delaney