UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WEATHERFORD INTERNATIONAL, LLC, Petitioner,

v.

BAKER HUGHES OILFIELD OPERATIONS, LLC, Patent Owner.

Case IPR2019-00708 Patent RE46,137

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Patent Owner requests oral argument to address this proceeding together with IPR2019-00768, with each side receiving 60 minutes to argue.

Without waiving consideration of other issues or limiting its ability to address those raised by Petitioner at oral argument, Patent Owner specifies the following issues to be argued:

- 1. Petitioner's failure to show that:
 - a. either of claims 1 and 34 are anticipated by Giroux;
 - any of claims 1, 8-11, 16, 17, 31, 34, 41, and 42 are obvious over
 Giroux, the alleged admitted prior art, and the knowledge of a
 POSITA; and
 - c. any of claims 1, 8-11, 16, 17, 31, 34, 41, and 42 are obvious over Giroux, Patel '853, the alleged admitted prior art, and the knowledge of a POSITA;
- 2. Petitioner's improper attempt to use reply EXs. 1027-1029 to establish its *prima facie* case;
- 3. Petitioner's failure to show that any of EXs. 1027-1029 are printed publications;
- 4. any issues raised in a motion to exclude; and
- 5. any issues at the Board's request.

Patent Owner also requests that audio/visual equipment, including a display and a VGA or HDMI cable for connecting the display to a laptop, be made available for displaying demonstrative exhibits.

Dated: April 29, 2020

Respectfully submitted,

/Mark T. Garrett/ Mark T. Garrett (Reg. No. 44,699)

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on April 29,

2020, a copy of Patent Owner's Request for Oral Argument was served on Lead and

Backup Counsel for Petitioner via email (by consent) to:

Lead Counsel:	Douglas R. Wilson (Reg. No. 54,542) doug.wilson@armondwilson.com ipr@armondwilson.com
Backup Counsel:	Boone Baxter (Reg. No. 69,363) bbaxter@hpcllp.com
	Michelle Armond (Reg. No. 53,954) michelle.armond@armondwilson.com

/Mark T. Garrett/ Mark T. Garrett (Reg. No. 44,699)