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 IPR2019-00768 Patent RE46,137

PATENT OWNER'S OBJECTIONS TO PETITIONER'S DEMONSTRATIVES



Patent Owner objects to slide 33 of Petitioner's Demonstratives because the quote appearing on the same is new argument.

## 768 Grounds 2, 3: Motivation to Use Giroux

"Non-obviousness cannot be established by attacking references individually where the rejection is based upon the teachings of a combination of references. Thus, [Giroux] must be read, not in isolation, but for what it fairly teaches in combination with the prior art as a whole."

In re Merck & Co., Inc., 800 F.2d 1091, 1097-98 (Fed. Cir. 1986) (citation omitted)

768 Reply (Paper 25) at 14-15; 768 Pet. (Paper 2) at 8-9, 47 Demonstrative Exhibit - Not Evidence



Dated: June 4, 2020 /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 June 4, 2020, a copy of Patent Owner's Objections to Petitioner's Demonstratives was served on Lead and Backup Counsel for Petitioner via email (by consent) to:

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