# 

WEATHERFORD INTERNATIONAL, LLC, Petitioner,

v.

BAKER HUGHES OILFIELD OPERATIONS, LLC Patent Owner.

Case IPR2019-00768 Patent RE46,137

PATENT OWNER'S RESPONSE



#### PATENT OWNER'S EXHIBIT LIST

Exhibit	Shorthand	Description
2001	Fleckenstein	Declaration of William W. Fleckenstein, Ph.D, PE (CA#1666)
2002	Chambers1	Declaration of Michael Chambers, filed in IPR2019-00708 as EX1005
2003		Not used
2004	ChambersDepo.	Transcript of Michael Chamber's November 21, 2019 Deposition



### TABLE OF CONTENTS

I.	INT	RODU	CTIO	N	1		
II.	PETITIONER'S GROUND 2 AND 3 OBVIOUSNESS CHALLENGES REQUIRING GIROUX FAIL						
	A.	Petitioner's Motivation Would Not Have Led a POSITA to Giroux					
	B.	The	The "Urging" Claims: 8-11, 16, 17, 31, 41, and 426				
		1.	The	Prior A	Art Does Not Teach a Biased-Closed Sleeve7		
			(a)	Amo	ands 2 and 3: Giroux's FIG. 3 Does Not bunt to a Disclosure of a Sleeve Urged to Its al Position		
				(i)	Petitioner/Mr. Chambers' Assertions About the Configuration of Piston 1108		
				(ii)	Petitioner Hasn't Established a POSITA Would View Giroux's Piston 110 as Contended		
			(b)	Adm	and 3: An Urged-Closed Sleeve Is Neither itted Prior Art Nor Within the General wledge of a POSITA		
			(c)		ands 2 and 3: Petitioner's Other Obviousness onales Fail		
				(i)	Petitioner's "Combine Prior Art Elements to Yield a Predictable Result" Argument Fails25		
				(ii)	Petitioner Fails to Establish That a POSITA Would Have Been Motivated by a Concern with Premature Movement of Patel '427's Actuator Mandrel		
				(iii)	A POSITA Concerned with Premature Actuation Would Not Have Used Sleeve Biasing		



	(iv) Petitioner's Obvious-to-Try Rationale Is Defective	37
(d)	Grounds 2 and 3: There Is No Motivation for Biasing the Claims Requiring Biasing and a Shear Pin/Structure Given Mr. Chambers's Admission	37
	ALLEGED SIMULTANEOUS INVENTION NOT SAVE ITS OBVIOUSNESS CHALLENGES	



#### **TABLE OF AUTHORITIES**

	Page(s)
Cases	
Arendi S.A.R.L. v. Apple Inc., 832 F.3d 1355 (Fed. Cir. 2016)	24, 25
In re Daniel, 17 C.C.P.A. 605 (C.C.P.A. 1929)	19, 20, 21
Dynamic Drinkware, LLC v. Nat'l Graphics, Inc., 800 F.3d 1375 (Fed. Cir. 2015)	40
Hockerson-Halberstadt, Inc. v. Avia Group Int'l, 222 F.3d 951 (Fed. Cir. 2000)	12, 17
K/S HIMPP v. Hear-Wear Techs., LLC, 751 F.3d 1362 (Fed. Cir. 2014)	24
<i>In re Kahn</i> , 441 F.3d 977 (Fed. Cir. 2006)	6, 34
KSR Int'l Co. v. Teleflex Inc., 550 U.S. 398 (2007)	26, 37
<i>In re Mraz</i> , 59 C.C.P.A. 866 (C.C.P.A. 1972)	19
Nautilus, Inc. v. Icon Health & Fitness, Inc., Case IPR2017-01408, Paper 51 (Dec. 3, 2018)	26
Ex parte Nguyen, Appeal 2018-001801, slip op. (P.T.A.B. Oct. 22, 2018)18	8, 20, 21, 22, 23
Nystrom v. Trex Co., 424 F.3d 1136 (Fed. Cir. 2005)	12
Pacific Market Int'l, LLC v. Ignite USA, LLC, Case IPR2016-01875, Paper 32 (March 27, 2018)	34
Par Pharm., Inc. v. Novartis AG, Case IPR2016-00084, Paper 73 (Jan. 11, 2018)	36



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