

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ENSIGN US SOUTHERN DRILLING LLC

Petitioner

v.

C&M OILFIELD RENTALS, LLC
D/B/A C-MOR ENERGY SERVICES

Patent Owner of Record

Inter Partes Review No.

IPR2023-00804

Patent No. 10,976,016

Filing Date: September 9, 2020

Issue Date: April 13, 2021

DECLARATION OF JAKE HAMDAN

Petitioner Ensign

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Declaration of Jake Hamdan supporting Petition for Inter Partes Review of
U.S. Patent No. 10,976,016

I, Jake Hamdan, declare as follows:

I. INTRODUCTION

1. My name is Jake Hamdan. Herein, I give my opinions as to how a hypothetical person of ordinary skill in the art (“POSITA”) would understand the scope of the claims and whether certain claims of U.S. Patent No. 10,976,016 (‘016 Patent) are invalid. I provide technical bases for these opinions as appropriate.

2. I am an employee of Ensign Drilling Inc. and its Vice-President of Engineering. I am over eighteen years of age, and I would otherwise be competent to testify as to the matters set forth herein if I am called upon to do so.

3. I have prepared this Declaration for consideration by the Patent Trial and Appeal Board in the *Inter Partes* Review of U.S. Patent No. 10,976,016.

4. I provide this Declaration at the request of Ensign US Southern Drilling LLC, an affiliate of Ensign Drilling Inc., in connection with the above-captioned *Inter Partes* Review. I have been informed and understand that Ensign US Southern Drilling LLC contends that asserted claims 1, 2, and 23 of the ‘016 Patent are invalid.

5. I have been asked to provide my opinions regarding whether claims 1, 2, and 23 are unpatentable because they would have been either anticipated or obvious to a POSITA at the time of the alleged invention, in light of the prior art.

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6. After careful analysis it is my opinion that claims 1, 2, and 23 of the '016 Patent are invalid over the prior art I considered during my analysis. The individual analysis of each of these claims is set out below.

7. This declaration contains statements of my opinions formed to date and the bases and reasons for those opinions. I may offer additional opinions based on further review of materials in this case, including opinions and/or testimony of other expert witnesses. I make this declaration based upon my own personal knowledge and, if called upon to testify, would testify competently to the matters contained herein. I have not been compensated for my efforts in connection with the preparation of this declaration. My employment and compensation at Ensign Drilling Inc. is in no way contingent on the results of these or any other proceedings in relation to the above captioned patent.

8. In forming my opinions, I relied on my knowledge and experience in the field and on documents and information referenced in this Declaration.

II. BACKGROUND AND QUALIFICATIONS

9. My complete qualifications and professional experience are described in my *Curriculum Vitae*, a copy of which can be found in Exhibit 1007. The following is a brief summary of my relevant qualifications and professional experience.

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