

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTELLIGENT WELLHEAD SYSTEMS, INC.,
Petitioner,

v.

DOWNING WELLHEAD EQUIPMENT, LLC,
Patent Owner.

IPR2024-00300
U.S. Patent 11,560,770

**PATENT OWNER'S OBJECTIONS TO
PETITIONER'S DEMONSTRATIVES**

Pursuant to the Board’s Order Setting Oral Argument (Paper 36), following a meet and confer with Petitioner, Patent Owner Downing Wellhead Equipment, LLC (“Patent Owner”) objects to slides 43 and 44 of Petitioner’s Demonstratives (Exhibit 1046).

I. Slide 43

Patent Owner objects to the entirety of slide 43 because it cites to Exhibit 2019, which was not cited or discussed in the Petition or Petitioner’s Reply, and thus any reliance on this exhibit is a “new argument” not included in any of Petitioner’s papers.

Secondary Considerations

From: Melissa Smith <Melissa.Smith@GulfEnergyInfo.com>
Sent: Thursday, August 29, 2024 6:42 AM
To: Tim Marvel <timmarvel@bref.energy>
Subject: RE: 2023 Gulf Energy Award Submission

Here you go!

Name of Technology or Individual (Company, Technology or Individual):
Freedom Series Completion System

Company Name (Assuming):
Downing Wellhead Equipment

Describe the nominee's including space and place:
Downing, a leading technology eliminates time between (please note the difference)
Downing identified the transition time and pressure maintenance and 4) an automated completion between stages with no pump for the duration of the operation. The system eliminates NPT associated with gate valves. The latest addition to the system, FS Hot Swap, enables the exchange of pumps during frac operations without stopping the frac. Although the system does not directly solve logistic issues (i.e. sand and water shortages), the demonstrated consistency achieved using the system enables better planning of resources. The system has broken multiple pumping records across US basins including hours pumped continuously and stages completed. In addition, the system has over a dozen industry "firsts" that have changed completion operations. With the addition of FS Hot Swap, the automated completion system enables operators to frac 24/7. The base system was introduced more than 12 months ago. However, the latest addition to the system, FS Hot Swap, commercially introduced this year, enables the 24/7 pumping and therefore submitted the system in its entirety.

(Ex. 2019; Paper 25, 26 citing Paper 20, 60-64, 66-69 citing Ex. 2019; Ex. 1044, ¶¶ 43-44)

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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NELSON MULLINS

II. Slide 44

Patent Owner objects to the entirety of slide 44 because it cites to Exhibit 1043, which was not cited or discussed in the Petition or Petitioner’s Reply in connection with Petitioner’s secondary considerations argument, and thus any

reliance on this exhibit is a “new argument” not included in any of Petitioner’s papers.

Secondary Considerations

21 Q Does hot swapping have anything to do with the
22 claimed CP swap?
23 A No, ma'am.

(Ex. 1043, 90:21-23; Paper 20, 60-69; Paper 25,
26-29; Ex. 1044, ¶¶ 43-44, Paper 31, 21-28)

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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 NELSON MULLINS

Respectfully submitted,

/Scott T. Jarratt/

Scott T. Jarratt
Lead Counsel for Patent Owner
Registration No. 70,297

Dated: February 20, 2025
HAYNES AND BOONE, LLP
2801 N. Harwood St., Suite 2300
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Customer No. 27683

CERTIFICATE OF SERVICE

The undersigned certifies that, in accordance with 37 C.F.R. § 42.6(e), service was made on Petitioner as detailed below.

Date of service February 20, 2025

Manner of service Electronic Service by E-mail:
tammy.terry@nelsonmullins.com;
lisa.margonis@nelsonmullins.com;

Documents served **Patent Owner's Objections to Petitioner's Demonstratives**

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/Scott T. Jarratt/
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