

Filed on behalf of Weatherford U.S., L.P.

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WEATHERFORD U.S., L.P.,
Petitioner,

v.

HALLIBURTON ENERGY SERVICES, INC.,
Patent Owner.

Case No. IPR2024-00990
U.S. Patent No. 11,333,007

PETITIONER'S OBJECTIONS TO EVIDENCE

I. INTRODUCTION

Pursuant to the Federal Rules of Evidence (“FRE”) and 37 C.F.R. § 42.64(b)(1), Petitioner Weatherford U.S., L.P. timely objects to the evidence submitted by Patent Owner Halliburton Energy Services, Inc. in this proceeding. Petitioner may move to exclude the challenged exhibits under 37 C.F.R. § 42.64(c) unless Patent Owner provides evidence curing the objections identified by Petitioner below.

II. SPECIFIC OBJECTIONS

A. Exhibit 2002 – Declaration of Dr. Robert A. Durham

Petitioner objects to Exhibit 2002 under FRE 701-705 and 801-802 because Dr. Durham has not been made available for deposition. Petitioner reserves the right to raise any additional objections that become apparent from Dr. Durham’s deposition at that time if he is made available for deposition. Petitioner additionally objects to Dr. Durham’s qualifications as an expert in the field of oil or gas well drilling, completion, and/or subsurface production operations because his knowledge, skill, experience, training, and education do not qualify him as an expert in this field under FRE 702. Additionally, Dr. Durham’s opinions do not meet the requirements of FRE 701 for opinion testimony by a lay witness because they purport to be based on scientific, technical, or other specialized knowledge within the scope of FRE 702.

B. Exhibit 2004 – Second Declaration of Dr. Robert A. Durham

Petitioner objects to Exhibit 2004 under FRE 701-705 and 801-802 because Dr. Durham has not been made available for deposition. Petitioner reserves the right to raise any additional objections that become apparent from Dr. Durham's deposition at that time if he is made available for deposition. Petitioner additionally objects to Dr. Durham's qualifications as an expert in the field of oil or gas well drilling, completion, and/or subsurface production operations because his knowledge, skill, experience, training, and education do not qualify him as an expert in this field under FRE 702. Additionally, Dr. Durham's opinions do not meet the requirements of FRE 701 for opinion testimony by a lay witness because they purport to be based on scientific, technical, or other specialized knowledge within the scope of FRE 702.

C. Exhibit 2010 – Conaway, Charles F., *The Petroleum Industry: A Nontechnical Guide*, Pennwell Books (1999)

Petitioner objects to Exhibit 2010 under FRE 106 because Patent Owner produced an incomplete excerpt of the document and has not made available a full copy to Petitioner.

ARMOND WILSON LLP

Dated: March 14, 2025

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CERTIFICATE OF SERVICE

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), a true copy of the foregoing **PETITIONER’S OBJECTIONS TO EVIDENCE** is being served electronically on March 14, 2025 to the following counsel for Patent Owner to the following email addresses:

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ARMOND WILSON LLP

Dated: March 14, 2025

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