UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FULL-METAL-POWER B.V.,
Petitioner,

v.

INFOCUS DOWNHOLE SOLUTIONS USA LLC,
Patent Owner.

IPR2025-00391
Patent 10,676,992 B2

PETITIONER'S OPPOSITION BRIEF TO PATENT OWNER'S REQUEST FOR DISCRETIONARY DENIAL

TABLE OF CONTENTS

TABLE OF AUTHORITIES....iv

I. INTRODUCTION....1

II. FACTUAL BACKGROUND....1

III. DISCRETIONARY DENIAL WOULD BE IMPROPER....2

A. *Fintiv* Factor 1: A Request for Stay in the District Court Would Be Premature, and the Grant of a Stay After IPR is Granted is Likely....2

B. *Fintiv* Factor 2: The District Court Litigation Is Not Advanced and The District Court's Trial Date Is Close to the Board's Deadline for a Final Written Decision....4

C. *Fintiv* Factor 3: There Has Been Limited Activity in the District Court Litigation and No Activity Related to the Merits of the Case....5

D. *Fintiv* Factor 4: The Petition and District Court Litigation Invalidity Contentions Include Materially Different Grounds, Arguments and Evidence....8

E. *Fintiv* Factor 5: Although Petitioner Is A Defendant in the District Court Litigation, There Are Two Other Co-Defendants, Including One With A Pending Motion to Dismiss for Improper Venue....9

F. *Fintiv* Factor 6: Merits of the Petition are Strong....10

a. Corresponding Canadian patent (CA2985258) is irrelevant....11

b. Invalidity grounds in the Petition are met by factual evidence of record....12

c. Claim construction requirements are met in the Petition and supported by factual evidence of record....14

IV. Conclusion....15

CERTIFICATION OF WORD COUNT....16

CERTIFICATION OF SERVICE....17

LIST OF EXHIBITS 18

TABLE OF AUTHORITIES

Cases

Amazon.com, Inc. v. CustomPlay, LLC,
IPR2018-01496, Paper 12 (PTAB Mar. 7, 2019).....6

Apple Inc. v. Fintiv, Inc.,
IPR2020-00019, Paper 11 (PTAB March 20, 2020)..... *passim*

Apple Inc. v. Fintiv, Inc.,
IPR 2020-00019, Paper 15 (PTAB May 13, 2020) 8

Chore-Time Equipment, Inc. v. Cumberland Corp.,
713 F.2d 774 (Fed. Cir. 1983).....13

General Plastic Industrial Co., Ltd. v. Canon Kabushiki Kaisha,
IPR 2016-01357, Paper 19 (PTAB Sept. 6., 2017) 5

Facebook, Inc. v. Search and Social Media Partners, LLC,
IPR2018- 01620 Paper 8 (PTAB Mar. 1, 2019) 6

In re Magnum Oil Tools Int'l, Ltd.,
829 F.3d 1364 (Fed. Cir. 2016).....12

Innogenetics NV v. Abbott Labs.,
512 F.3d 1363 (Fed. Cir. 2008).....12

Meyer Intellectual Properties Ltd. v. Bodum Inc.,
690 F.3d 1354 (Fed. Cir. 2012)..... 12-13

Nanoco Techs. Ltd. v. Samsung Elecs. Co.,
No. 2:20-CV-00038-JRG, 2021 WL 3027335 (E.D. Tex. Jan. 8, 2021).....2-3

NFC Tech. LLC v. HTC Am.,
Inc., Case No. 2:13-cv-1058-WCB, 2015 U.S. Dist. LEXIS 29573, 2015 WL
1069111 (E.D. Tex. Mar. 11, 2015) 3

NHK Spring Co. v. Intri-Plex Techs., Inc.,
IPR2018-00752, Paper 8 (PTAB Sept. 12, 2018) 5-6

Princeton Biochemicals Inc. v. Beckman Coulter Inc.,
411 F.3d 1332 (Fed. Cir. 2005) 12-13

Other Authorities

37 C.F.R. §42.100(b) 14

I. INTRODUCTION

Petitioner submits that institution of *inter partes* review ("IPR") of U.S. Patent No. 10,676,992 (the "'992 Patent") is appropriate under the factors set forth in *Apple Inc. v. Fintiv, Inc.*, IPR2020-00019, Paper 11 (PTAB March 20, 2020). For the reasons stated below, Patent Owner's request for discretionary denial should be rejected.

II. FACTUAL BACKGROUND

On October 30, 2024, Patent Owner filed suit in the Eastern District of Texas for infringement of the '992 Patent (the "District Court Litigation") against Petitioner, its Netherlands-based CEO, and a U.S.-based independent contractor sales director, Aaron Baxter (collectively "Defendants"). Mr. Baxter's deadline to answer was December 30, 2024, and Petitioner and its CEO's deadline (as foreign entities) was January 28, 2025. Declaration of Michael Locklar ¶ 3 (Exhibit 1017). Petitioner filed its Petition for IPR on December 27, 2024, prior to Answers being filed in the District Court Litigation. *Id.* ¶ 4.

On January 30, 2025, the IPR was accorded a filing date of December 27, 2024, and Patent Owner was instructed that it could file a preliminary response within three months of January 30. Paper 5.

There are no upcoming deadlines in the District Court Litigation until August 13, 2025, when the parties are to exchange their Proposed Claim Terms to

begin the claim construction process, and there are no pending discovery requests. Locklar Decl. ¶ 8. The Claim Construction Hearing is not scheduled until December 17, 2025. *Id*. Fact discovery closes February 2, 2026, expert discovery closes March 9, 2026, and trial is not scheduled until June 22, 2026. *Id.* ¶ 9. The District Court has made no decisions in the District Court Litigation that would affect any issue in the Petition before the Board. *Id.* ¶ 10.

III. DISCRETIONARY DENIAL WOULD BE IMPROPER

A. *Fintiv* Factor 1: A Request for Stay in the District Court Would Be Premature, and the Factors Considered by the Eastern District of Texas Suggest a Motion for Stay Would Be Well Received

Patent Owner argues that the lack of a motion to stay in the District Court Litigation is a factor relevant to the Board's decision about whether to exercise discretionary denial. Petitioner disagrees. A motion to stay before the Board granted an IPR would have been premature in the Eastern District of Texas, as previously held by Judge Rodney Gilstrap, the presiding judge in the District Court Litigation. *See, e.g., Nanoco Techs. Ltd. v. Samsung Elecs. Co.,* No. 2:20-CV-00038-JRG, 2021 WL 3027335, at *4 (E.D. Tex. Jan. 8, 2021) (denying without prejudice motion to stay proceedings in advance of the Board's decision on whether or not to institute *inter partes* review of asserted patents, finding "where a motion to stay is filed before the PTAB institutes any proceeding, courts often withhold a ruling pending action on the petition by the PTAB or

deny the motion without prejudice to refiling in the event that the PTAB institutes a proceeding.") "Indeed, this Court has a consistent practice of denying motions to stay when the PTAB has yet to institute post-grant proceedings." *Id*.

Such a motion to stay will likely be well-received once the IPR is granted. In *Nanoco Techs.*, the judge in the District Court Litigation observed: "District courts typically consider three factors when determining whether to grant a stay pending *inter partes* review of a patent in suit: (1) whether the stay will unduly prejudice the nonmoving party, (2) whether the proceedings before the court have reached an advanced stage, including whether discovery is complete and a trial date has been set, and (3) whether the stay will likely result in simplifying the case before the court." 2021 WL 3027335 at **3-4 (quoting *NFC Tech. LLC v. HTC Am., Inc.*, Case No. 2:13-cv-1058-WCB, 2015 U.S. Dist. LEXIS 29573, 2015 WL 1069111, at *2 (E.D. Tex. Mar. 11, 2015) (Bryson, J.). "Based on th[ese] factors, courts determine whether the benefits of a stay outweigh the inherent costs of postponing resolution of the litigation." *Id.* at *4. As discussed further below, a stay would not unduly prejudice Patent Owner because the request for IPR was filed before Petitioner and other Defendants answered and the proceedings have not reached an advanced stage; trial is set for over a year away, and discovery has not even begun in any significant way. Locklar Decl. ¶¶

4, 8-9. This IPR would certainly simplify the invalidity issues in front of the District Court.

The Board in *Fintiv*, IPR 2020-00019, Paper 11 at 7, also acknowledged that some courts have "denied a motion for stay without prejudice and indicated to the parties that it will consider a renewed motion or reconsider a motion to stay if a PTAB trial is instituted" which "suggests the district court may be willing to avoid duplicative efforts and await PTAB's final resolution of the patentability issues raised in the petition before proceeding with the parallel litigation." This factor is neutral with respect to discretionary denial.

B. *Fintiv* Factor 2: The District Court Litigation Is Not Advanced and The District Court's Trial Date Is Within a Month of the Board's Deadline for a Final Written Decision

While the Patent Owner has focused on the fact that the trial date is approximately a month before the anticipated decision by the Board, this is just one factor to consider. The Board in *Fintiv* found "If the Court's trial date is at or around the same time as the projected statutory deadline… the decision whether to institute will likely implicate other factors discussed herein, such as the resources that have been invested in the parallel proceeding." IPR 2020-00019, Paper 11 at 9. In *Fintiv*, trial was nine months away and claim construction was complete. Here, trial is over a year away and the *Markman* hearing is nearly eight months away.

In *NHK Spring Co. v. Intri-Plex Techs., Inc.,* IPR2018-00752, Paper 8 (PTAB Sept. 12, 2018) (precedential, designated May 7, 2019), relied upon heavily by the Board in *Fintiv*, the trial was in its "Final Stages" with expert discovery set to conclude in less than two months, and trial six months away. *Id*. at 20. The IPR would not conclude until six months after trial was scheduled. *Id*. The Board found that institution of an *inter partes* review under these circumstances would not be consistent with "an objective of the AIA… to provide an effective and efficient alternative to district court litigation." *Id.* (quoting *General Plastic Industrial Co., Ltd. v. Canon Kabushiki Kaisha*, IPR 2016-01357. Paper 19 at 16–17 (PTAB Sept. 6., 2017).

The present litigation has barely begun, with the claim construction process not starting until August 2025, the claim construction hearing set for December 2025, and fact and expert discovery not concluding until February and March 2026 respectively. Locklar Decl. ¶¶ 8-9. Declaring an IPR at this stage would provide an effective and efficient alternative to district court litigation for which the IPR process was designed. This factor weighs against discretionary denial.

C. *Fintiv* Factor 3: There Has Been Limited Activity in the District Court Litigation and No Activity Related to the Merits of the Case

Despite Patent Owner's argument that "the parties and the court have invested resources in actively litigating this case," Paper 11 at 5, the activity by the District Court has been limited and routine, and the activity by the parties has been

very limited as well. The Board found in *Fintiv,* IPR 2020-00019, Paper 11 at 9, that "if, at the time of the institution decision, the district court has not issued orders related to the patent at issue in the petition, this fact weighs against exercising discretion to deny institution under *NHK*." *Citing Facebook, Inc. v. Search and Social Media Partners, LLC*, IPR2018- 01620, Paper 8 at 24 (PTAB Mar. 1, 2019) (refusing discretionary denial where the district court proceeding was in its early stages, with no claim construction having been determined, and discovery open); *Amazon.com, Inc. v. CustomPlay*, LLC, IPR2018-01496, Paper 12 at 8–10 (PTAB Mar. 7, 2019) (refusing discretionary denial where the district court proceeding was in its early stages, with no fact depositions taken, and no claim construction hearing held).

In the District Court Litigation, there have been no substantive decisions made by the district court or briefing on any substantive issues. Locklar Decl. ¶ 10. There has been no request for an injunction by Patent Owner. *Id*. There have been no depositions conducted, and the *Markman* Hearing is not scheduled until December 2025. *Id.* ¶ 8-9. The claim construction process leading to *Markman* will not even *begin* until August 13, 2025 (when the parties are to submit proposed claim terms, followed by their exchange of preliminary claim constructions on September 3, 2025), long after the Board makes its decision on the Petition. *Id.* ¶ 8. The only discovery other than initial disclosures and other mandated disclosures

were three interrogatories related to Defendant Baxter's motion to dismiss for improper venue. *Id.* ¶ 9. There has been no other discovery served by either party and no depositions requested. *Id*.

Petitioner's diligence in filing its request for IPR also favors granting of the IPR. As the Board in *Fintiv* found:

> As a matter of petition timing, notwithstanding that a defendant has one year to file a petition, it may impose unfair costs to a patent owner if the petitioner, faced with the prospect of a looming trial date, waits until the district court trial has progressed significantly before filing a petition at the Office. The Board recognizes, however, that it is often reasonable for a petitioner to wait to file its petition until it learns which claims are being asserted against it in the parallel proceeding. Thus, the parties should explain facts relevant to timing. *If the evidence shows that the petitioner filed the petition expeditiously, such as promptly after becoming aware of the claims being asserted,* this fact has weighed against exercising the authority to deny institution under *NHK*.

Fintiv, IPR 2020-00019, Paper 11 at 11 (emphasis added). Here, Petitioner filed its request less than two months after suit was filed and before any of the defendants answered in the district court litigation. Locklar Decl. ¶ 4. Patent Owner's infringement contentions were served on January 7, 2024, *after* Petitioner filed its IPR request. *Id.* ¶ 6.

In *Fintiv*, the Patent Owner had filed its original complaint on December 21, 2018, and served Apple with its complaint on January 4, 2019. *Apple Inc. v. Fintiv, Inc*., IPR 2020-00019, Paper 15 at 8-9 (PTAB May 13, 2020). The Petition was not filed until October 28, 2019, over nine months after the complaint was served and five months after the Petitioner received Patent Owner's infringement conditions. Shortly thereafter, the District Court held a *Markman* hearing on November 7, 2019, and a few weeks after issued a detail 34-page claim construction order construing seven claim terms. *Id.* at 14. Fact discovery was ongoing and two depositions had been conducted. *Id.* at 13. Trial was set for November 16, 2020, just over six months later. *Id.* at 9.

In contrast, in this matter, Petitioner's Petition was filed before it even answered the suit in the District Court, and none of the extensive substantive work that had been done in *Fintiv*, on claim construction or otherwise, has been done. Locklar Decl. ¶¶ 4, 8-9. This factor weighs against discretionary denial.

D. *Fintiv* Factor 4: The Petition and District Court Litigation Invalidity Contentions Include Materially Different Grounds, Arguments and Evidence

The invalidity grounds asserted in the Petition and in the District Court Litigation are different.

The District Court Litigation includes invalidity contentions based on prior art, including High aspect ratio deep spiral tube electrochemical machining

technology, L. Tang, Z.J. Fan, G.G. Zhao, F. Yang, S. Yang / Elsevier B.V. (2016) and US20110243774, not relied on for invalidity grounds in the Petition. (EX. 2004, pp. 1-3, 5-6). While Wangenheim was used in the invalidity grounds in the Petition and the District Court Litigation, only the District Court Litigation uses Wangenheim as a base reference. (EX. 2004, p. 5). Further, the District Court Litigation includes invalidity contentions under both 35 U.S.C. §§ 112 and 256, which require additional evidence not included in the Petition. (EX. 2004, pp. 7-14).

This IPR hence would resolve key issues avoiding inefficiency of litigating non-overlapping challenges presented in the District Court Litigation. Since the comparison above shows "the petition includes materially different grounds, arguments, and/or evidence than those presented in the district court, this fact has tended to weigh against exercising discretion to deny institution." *Fintiv*, IPR2020-00019, Paper 11 at 12-13. This factor weighs against discretionary denial.

E. *Fintiv* Factor 5: Although Petitioner Is A Defendant in the District Court Litigation, There Are Two Other Co-Defendants, Including One With A Pending Motion to Dismiss for Improper Venue

In addition to the Petitioner in this matter, there are two other Defendants in the District Court Litigation. Although one is the CEO of Petitioner, the other Defendant, Aaron Baxter, is an independent contractor sales director for Petitioner, and the lone U.S.-based defendant in the District Court Litigation.

Locklar Decl. ¶ 5. The district court has not yet ruled upon his motion to dismiss for improper venue. *Id*. Thus, this is not a matter in which the parties to the District Court litigation and this matter are identical. This factor is neutral.

F. *Fintiv* Factor 6: Merits of the Petition are Strong

"[I]f the merits of a ground raised in the petition seem particularly strong on the *preliminary record,* this fact has favored institution." *Fintiv, Inc.*, IPR2020-00019, Paper 11 at 14-15 (emphasis added). As the Board found in *Fintiv*, IPR 2020-00019, Paper 11 at 14-16:

> [T]he factors considered in the exercise of discretion are part of a balanced assessment of all relevant circumstances in the case, including the merits. For example, if the merits of a ground raised in the petition seem particularly strong on the preliminary record, this fact has favored institution. In such cases, the institution of a trial may serve the interest of overall system efficiency and integrity because it allows the proceeding to continue in the event that the parallel proceeding settles or fails to resolve the patentability question presented in the PTAB proceeding. By contrast, if the merits of the grounds raised in the petition are a closer call, then that fact has favored denying institution when other factors favoring denial are present. This is not to suggest that a full merits analysis is necessary to evaluate this factor. Rather, there may be strengths or weaknesses regarding the merits that the Board considers as part of its balanced assessment.

The Board takes a "holistic view of whether efficiency and integrity of the system are best served by denying or instituting review." *Id.* at 6.

All claim elements in the '992 Patent are present in the prior art cited in the Petition. The claims in the '992 Patent generally relate to simple downhole tools having a rotor and a stator that is formed by electrochemical machining (ECM), an old process used to manufacture the downhole tools in the multiple prior art references cited in the Petition. New references never considered by the USPTO including Zhilong and Yang each individually disclose all-metal screw pumps as the downhole tools with the elements of the claims in the '992 Patent. The grounds raised in the petition are strong, and this IPR of the '992 Patent best provides for efficient assurance of patent quality.

The bases on which the Patent Owner relies to argue the merits of the Petition are incorrect, unsubstantiated, and/or misconstrue the Petition as set forth below.

a. Corresponding Canadian patent (CA2985258) is irrelevant.

The Patent Owner argues that while Yang had not been considered in the '992 Patent, Yang was disclosed to the Canadian examiner on December 30, 2022, with respect to CA2985258. (Ex. 2005 at 247). The Patent Owner's argument serves only to highlight the likely relevance of Yang. The merits of the Petition thus cannot be assessed to ensure U.S. patent quality by outcomes in foreign patent

offices, which have different laws/procedures than the U.S. and their own patent quality issues and remedies regarding issuance of invalid claims. On balance, Canadian prosecution history therefore bears no weight on discretionary denial of this IPR.

b. Invalidity grounds in the Petition are met by factual evidence of record.

The Patent Owner incorrectly argues that there is a requirement that a prior art reference be accompanied by expert testimony. Paper 11 at 9. For obviousness, a Petition need only "articulate specific reasoning, based on evidence of record, to support the legal conclusion of obviousness" and "there is no invariable requirement that a prior art reference be accompanied by expert testimony." *In re Magnum Oil Tools Int'l, Ltd*., 829 F.3d 1364, 1380 (Fed. Cir. 2016); *Meyer Intellectual Properties Ltd. v. Bodum Inc.*, 690 F.3d 1354, 1374 (Fed. Cir. 2012). Moreover, "an expert is not the only source for evidence that it would be obvious for one skilled in the art to combine references to reach the claimed method." *Innogenetics NV v. Abbott Labs.*, 512 F.3d 1363, 1374 (Fed. Cir. 2008).

The "evidence of record" in the IPR includes the prior art patents and printed publications cited in the Petition. The Petition articulates the legal reasoning for obviousness and cites where the suggestion or motivation to modify appears "in the content of the public prior art" or "in the nature of the problem to be addressed by the invention." *Princeton Biochemicals Inc. v. Beckman Coulter Inc.*, 411 F.3d

1332, 1338–39 (Fed. Cir. 2005). Furthermore, Patent Owner fails to identify how there is any deficiency in the prior art cited in the Petition that would impact merits of the Petition.

Furthermore, the Petition shows how "the subject matter of the patent and the prior art were in this case so easily understandable, a factual determination of the level of skill in the art was unnecessary" and "expert testimony is not required" to explain the technology. *Chore-Time Equipment, Inc. v. Cumberland Corp.*, 713 F.2d 774, 779 (Fed. Cir. 1983); *Meyer Intellectual Properties Ltd.*, 690 F.3d at 1374. By way of example for ground 1 invalidity of claim 1 in the Petition, Froelich is added in the obviousness rejection based on Zhilong only for the evidence that a screw pump with a stator inherently has a rotor to be functional even if the rotor is not directly mentioned in Zhilong. Paper 1 at 18. In another example for ground 4 invalidity of claim 1 in the Petition, Jinqi is used to establish specific dimensions and further processing steps with final heat treatment of full-metal screw pumps used in the same field as those in the base reference Yang. Paper 1 at 40-41.

As for evidentiary support for Zhilong disclosing a stator "formed from a single integral block of material," the Petition set forth where in Zhilong this element is taught for a primary basis of invalidation, which thus includes all evidence needed to support merits of the Petition. Paper 1 at 18 and 26. If the

Board should for any reason disagree with this primary basis of invalidation, a secondary basis for invalidation was set forth in the Petition in which a legal argument based on *In re Larson* was made that no evidentiary support of any form is even needed for this specific claim element. Paper 1 at 19 & 27. The Patent Owner has failed to acknowledge the meritorious primary basis of invalidation of the claim element and misconstrued lack of evidentiary support on this secondary basis for invalidation of the claim element given none is needed based on the law. Paper 11 at 9-10.

c. Claim construction requirements are met in the Petition and supported by factual evidence of record.

The Petition has satisfied rule 37 CFR 42.104(b)(3) because the Petition has stated "[h]ow the challenged claim is to be construed," namely, by giving all terms their ordinary and customary meaning. 37 CFR 42.104(b)(3). Specifically, the Petition expressly states:

> A claim in IPR shall be construed "in accordance with the ordinary and customary meaning of such claim as understood by one of ordinary skill in the art and the prosecution history pertaining to the patent." 37 C.F.R. §42.100(b); *see Cuozzo Speed Techs., LLC*, at 2142. *Petitioner interprets the claims accordingly*.

Paper 1 at 13 (emphasis added). This statement in the Petition does not imply every word must be defined by a declaration from a person of ordinary skill in the

art for the Board to be able to have all the reviewable evidence necessary for understanding of the claim. Accordingly, no requirement exists for the Petition to have a claim defined by a declaration from a person of ordinary skill in the art. This factor weighs against discretionary denial.

IV. Conclusion

For the foregoing reasons, the Board should not discretionarily deny institution of the IPR under 35 U.S.C. §325(d).

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CERTIFICATION OF WORD COUNT

I hereby certify that this Opposition Brief complies with the 5,600 word limit and contains 4323 words as measured by the word processing software used to prepare the document.

Date: May 19, 2025

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CERTIFICATION OF SERVICE

I hereby certify that the above document was served on May 19, 2025, via email to the attorney of record at the following address:

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LIST OF EXHIBITS

Exhibit No.	Title
1001	U.S. Patent No. 10,676,992 ("the '992 Patent")
1002	Amendment After Non-Final Rejection dated December 1, 2019, in prosecution history of the '992 Patent ("ROA")
1003	Notice of Allowance, in prosecution history of the '992 Patent ("NOA")
1004	CA2961629 – "the '629 priority application"
1005	Chinese patent publication number CN102501016A – translated ("Zhilong")
1006	Yang, F., Ren, T., Wang, H., Liu, B., & Chen, M. (2016). Analysis of flow field for electrochemical machining metal screw pump stator. *The International Journal of Advanced Manufacturing Technology*. https://doi.org/10.1007/s00170-016-9187-y ("Yang")
1007	U.S. Patent Application Publication No. 2010/0006342 ("Froehlich")
1008	U.S. Patent Application Publication No. 2016/0168912 ("Mitchell")
1009	U.S. Patent No. 9,976,227 ("Wangenheim")
1010	Chinese patent publication number CN201121583Y – translated ("Jinqi")
1011	Chinese patent publication number CN102139440A – translated ("Jinglong")
1012	Chinese patent publication number CN102501016A – untranslated
1013	Chinese patent publication number CN201121583Y – untranslated
1014	Chinese patent publication number CN102139440A – untranslated
1015	Affidavit for translations of CN102501016A and CN102139440A
1016	Affidavit for translation of CN201121583Y
1017	Declaration of Michael Locklar in Support of Petitioner's Opposition Brief to Patent Owner's Request for Discretionary Denial
2001	Declaration of Archibald Cruz in Support of Motion for Pro Hac Vice Admission
2002	Declaration of Archibald Cruz in Support of Request for Discretionary Denial

2003	Docket Control Order (ECF No. 27), InFocus Downhole Solutions USA LLC v. Full-Metal Power B.V., No. 2:24-cv-00875 (E.D. Tex.)
2004	Defendants' invalidity contentions, InFocus Downhole Solutions USA LLC v. Full-Metal Power B.V., No. 2:24-cv-00875 (E.D. Tex.)
2005	File History of CA2985258
2006	Declaration of Jeffry "Jeff" Chestnut