

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

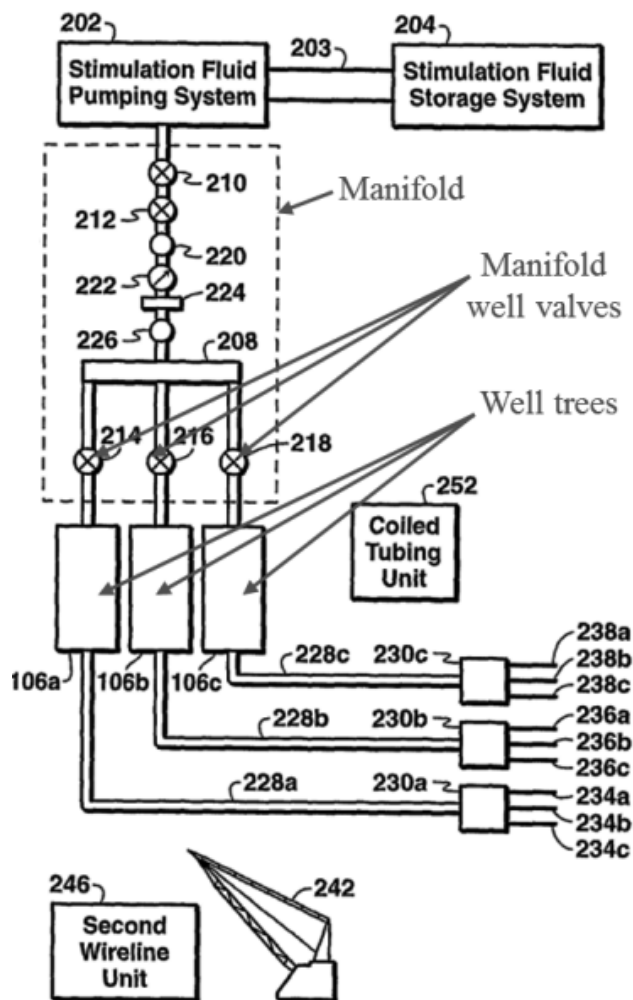
INTELLIGENT WELLHEAD SYSTEMS, INC.,
Petitioner,

v.

DOWNING WELLHEAD EQUIPMENT, LLC,
Patent Owner.

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

PATENT OWNER RESPONSE



Petition, 72 (annotating Ex.1006, Fig.2); Ex.2012, ¶197. In the description of Fig. 2, Tolman only generically refers to “a valve (not shown) on the tree 106a-106,” “one or more valves be installed on trees 106a-106c,” and “wellhead tree valves.” Ex.1006, 7:29-33, 8:13, 13:39. Thus, even if the Board endeavored to glean more information from Tolman itself, it could not. This lack of disclosure in Tolman with respect to the tree valves, combined with Petitioner’s and Dr. Durham’s lack of specificity, does not allow Patent Owner (or the Board) to