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**From:** Bruce Cannon <bcannon@SMD-IPLaw.com>  
**Sent:** Monday, November 21, 2016 11:41 AM  
**To:** Hotze, Melissa; LSPI BH FC  
**Cc:** Bob McAughan; Jeff Andrews; Chris Lonvick; Jill Senn  
**Subject:** RE: Hearing

Melissa,

Thank you for your email.

First, regarding the requested highlighted copy of the '118 Patent, we believe any submission should include all references to the identified terms. For "pipeline", references to "pipe-line" are missing. *See, e.g.* col. 17, lines 11-12. For "solubility parameter", there are many missing references to "solubility parameter" including for example references to both solubility parameter alone and the solubility parameter of the drag reducing polymer. We also note that we did not understand that the Court was asking for "solubility parameter" to be highlighted at all, but we do not object to adding it as long as all citations are included.

Second, regarding the designation of the slide at BH013806, Baker Hughes designated the entire document Highly Confidential subject to the Protective Order because the document as a whole contains Highly Confidential information. However, Baker Hughes does not contend that BH013806 contains confidential information and therefore will de-designate that particular slide (BH013806). Baker Hughes does not agree that this sets a precedent that requires the parties to designate on a page-by-page basis as opposed to a document-by-document basis.

Third, please let us know when we can expect your proposed order and modified protective order.

Finally, in an attempt to avoid any future disputes, we propose that Lubrizol provide us with its proposed descriptions that it intends to provide to the IPR Board of any documents from its Exhibit A and its proposed motion so that the parties may attempt to work toward an agreed description for submission to the Board and work to protect the confidentiality of Baker Hughes' information.

Best regards,  
Bruce



Bruce J. Cannon • Attorney  
Sutton McAughan Deaver PLLC  
713.800.5708 • [smd-iplaw.com](http://smd-iplaw.com)

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**From:** Hotze, Melissa [<mailto:melissa.hotze@weil.com>]  
**Sent:** Monday, November 21, 2016 8:13 AM  
**To:** Jeff Andrews; Bob McAughan; Bruce Cannon; Chris Lonvick; Jill Senn

**Cc:** LSPI BH FC  
**Subject:** Hearing

Counsel,

Judge Atlas requested a highlighted copy of the Patents-in-Suit. We plan to provide her a paper copy of the attached highlighted version. Please let us know if you have any comments.

Also, please confirm that Baker is no longer designating the slide at BH013806 that states "Traditional DRA doesn't work in heavy crude" as confidential or highly confidential.

We will be sending over the proposed order and modified protective order later.

Thanks,

Melissa



**Melissa Hotze**

Weil, Gotshal & Manges LLP  
700 Louisiana, Suite 1700  
Houston, TX 77002-2755  
[melissa.hotze@weil.com](mailto:melissa.hotze@weil.com)  
+1 713 546 5033 Direct  
+1 713 224 9511 Fax

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