

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

CHRISTOPHER M. KNOTT

*PLAINTIFF,*

v.

COMPLETION EQUIPMENT  
RENTAL, INC.

*DEFENDANT.*

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CASE NO. \_\_\_\_\_

JURY TRIAL REQUESTED

**PLAINTIFF’S ORIGINAL COMPLAINT**

Plaintiff, Christopher M. Knott (“Knott” or “Plaintiff”) files this Original Complaint against Defendant Completion Equipment Rental, Inc. (“CER” or “Defendant”) for infringement of U.S. Patent No. 10,358,891, U.S. Patent No. 10,513,906 (“the ‘906 Patent”) and U.S. Patent No. 10,517,888 (“the ‘888 Patent”) (collectively, the “Knott Patents”). Plaintiff would show the Court the following:

**PARTIES**

1. Plaintiff Christopher M. Knott is an individual who resides in Midland, Texas. All pleadings may be served on Knott through his attorney-in-charge, David K. Anderson, Anderson & Cunningham, P.C., Four Houston Center, 1221 Lamar, Suite 1115, Houston, Texas 77010.

2. Defendant Completions Equipment Rental, Inc. is a Texas corporation with its corporate office at 4085 Cibolo Canyons, Suite 101, San Antonio, Texas 78261. Defendant may be served with process through its registered agent, Richard A. Prudhomme, 4085 Cibolo Canyons Street, Suite 101, San Antonio, Texas 78261. Defendant maintains a physical office in this judicial

district at 2500 TX 135, Kilgore, Texas 75662 and Defendant's office is a regular and established place of business.

**JURISDICTION AND VENUE**

3. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1338(a) and 1367 because this is an action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. §§ 271, *et seq.*

4. The Court has specific and general personal jurisdiction over Defendant, pursuant to due process and the Texas Long Arm Statute for the following reasons: Defendant is present within or has minimum contacts within the State of Texas and the Eastern District of Texas; Defendant has purposefully availed itself of the privileges of conducting business in the State of Texas and the Eastern District of Texas; Defendant has sought protection and benefit from the laws of the State of Texas; Defendant regularly conducts and/or solicits business and engages in other persistent courses of conduct within the State of Texas and within the Eastern District of Texas; Defendant maintains a regular and established place of business within the Eastern District of Texas; and Defendant has derived substantial revenues from its business activities, including its infringing acts, occurring within the State of Texas and the Eastern District of Texas.

5. Defendant directly and/or through authorized intermediaries, ships, distributes, offers for sale, sells, leases, markets, and/or advertises products and services in the United States, the State of Texas, and the Eastern District of Texas, including but not limited to the accused products, systems, processes, or devices. Defendant solicits customers in the State of Texas and in the Eastern District of Texas.

6. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b), 1391(c), and 1400(b). Defendant has a physical regular and established place of business in this district:



Defendant has transacted business in this judicial district,<sup>1</sup> and has directly and indirectly committed and/or induced acts of patent infringement in this district.

#### **PATENTS IN SUIT**

7. On July 23, 2019, the '891 Patent, entitled Portable Lubrication Unit for a Hydraulic Fracturing Valve Assembly and Method for Pre-Pressurizing Valves was issued by the United States Patent and Trademark Office. Knott is the owner of the '891 Patent. A true and correct copy of the '891 Patent is attached as Exhibit A and incorporated herein by reference. The '891 Patent covers a portable lubrication unit and method for pre-pressurizing fluid control valves which may be a part of a hydraulic fracturing tree or a zipper frac manifold. The method uses a lubrication unit for pre-pressurizing the cavity of a valve by injecting lubricant under high pressure, and then the lubrication unit is used to hold pressure during hydraulic fracturing operations. Lubricating the control valves reduces or eliminates scarring of the internal components of the control valve by equalizing pressure of the fracturing fluid.

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<sup>1</sup> <http://completionrental.com/contact-us/> (last accessed August 9, 2022); see also <http://completionrental.com/wp-content/uploads/2020/07/CompletionEquipmentRental-Flyer-lorez.pdf> (last accessed August 9, 2022).

8. On December 24, 2019, the ‘906 Patent, entitled Portable Lubrication Unit for a Hydraulic Fracturing Valve Assembly and Method for Pre-Pressurizing Valves was issued by the United States Patent and Trademark Office. Knott is the owner of the ‘906 Patent. A true and correct copy of the ‘906 Patent is attached as Exhibit B and incorporated herein by reference. The ‘906 Patent covers a portable lubrication unit and method for pre-pressurizing fluid control valves which may be a part of a hydraulic fracturing tree or a zipper frac manifold. The method uses a lubrication unit for pre-pressuring the cavity of a valve by injecting lubricant under high pressure, and then the lubrication unit is used to hold pressure during hydraulic fracturing operations.

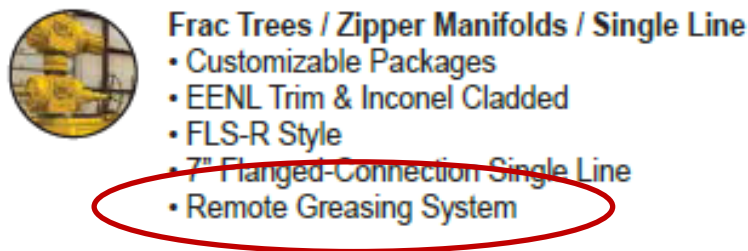
8. On March 3, 2020, the ‘888 Patent, entitled “Method of Pressurizing Fluid Control Valve”, was issued by the United States Patent and Trademark Office. Knott is the owner of the ‘888 Patent. A true and correct copy of the ‘888 Patent is attached as Exhibit C and incorporated herein by reference. The ‘888 Patent covers a method for pre-pressurizing fluid control valves which may be a part of a hydraulic fracturing tree or a zipper frac manifold. In either instance, the method uses a lubrication unit for pre-pressurizing the cavity of a valve by injecting lubricant under high pressure. The method of pre-pressurizing the control valves reduces or eliminates scarring of the internal components of the control valve by equalizing pressure of the fracturing fluid.

9. Knott is the valid owner of all rights, title, and interest in the ‘891 Patent, ‘906 Patent and ‘888 Patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the ‘891 Patent, ‘906 Patent and the ‘888 Patent. Accordingly, Knott possesses the exclusive right and standing to prosecute the present action for Defendant’s infringement of these Knott Patents.

**COUNT I: INFRINGEMENT OF THE '891 PATENT**

10. Knott refers to and incorporates herein the allegations of Paragraphs 1 through 9 above.

11. Defendant CER now makes, manufactures, distributes, markets, sells, leases and/or uses a Remote Greasing Unit with “Remote Grease Purging System” for servicing valves during fracturing operations (“Infringing Product”):<sup>2</sup>



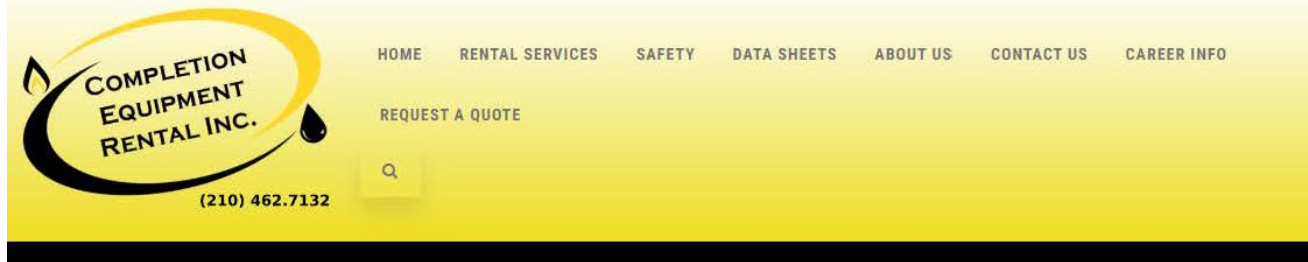
Defendant describes its “Remote Grease Purging System” as “streamlined technology to decrease valve damage and routine greasing” and states that the “system provides a step change in valve performance by reducing valve damages cause [sic] during fracturing operations while also improving HSE.”<sup>3</sup> The system “[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs.”<sup>4</sup> The CER valve purging system “[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and chemicals from entering valve cavity, reducing damages to zipper and frac tree”:<sup>5</sup>

<sup>2</sup> <http://completionrental.com/remote-greasing-system-w-valve-purging-system-coming-soon/> (last accessed August 9, 2022).

<sup>3</sup> [http://completionrental.com/wp-content/uploads/2020/07/Remote-Grease-Purging-System\\_Data-Sheet.pdf](http://completionrental.com/wp-content/uploads/2020/07/Remote-Grease-Purging-System_Data-Sheet.pdf) (last accessed August 9, 2022).

<sup>4</sup> <http://completionrental.com/remote-greasing-system-w-valve-purging-system-coming-soon/> (last accessed August 9, 2022).

<sup>5</sup> <http://completionrental.com/remote-greasing-system-w-valve-purging-system-coming-soon/> (last accessed August 9, 2022).



Holds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs. we also offer single grease units with flat rates per greasing.

The CER “Remote Grease Purging System” “provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time. This allows: (1) valves to remain full of grease (2) keeps sand, debris, and corrosive chemicals from entering the cavity, (3) reduces damage to internal parts and valve repair charges, and (4) shortens transition times and reduces nonproductive time by eliminating the need for routine greasing:”<sup>6</sup>



<sup>6</sup> [http://completionrental.com/wp-content/uploads/2020/07/Remote-Grease-Purging-System\\_Data-Sheet.pdf](http://completionrental.com/wp-content/uploads/2020/07/Remote-Grease-Purging-System_Data-Sheet.pdf)

**Improved Operational Efficiency**

Utilizing a programmable logic controller, the Grease Purging System provides grease pressure in the valve cavity enabling it to maintain a continuous purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time. This allows: (1) valves to remain full of grease (2) keeps sand, debris, and corrosive chemicals from entering the valve cavity, (3) reduces damage to internal parts and valve repair charges, and (4) shortens transition times and reduces nonproductive time by eliminating the need for routine greasing.

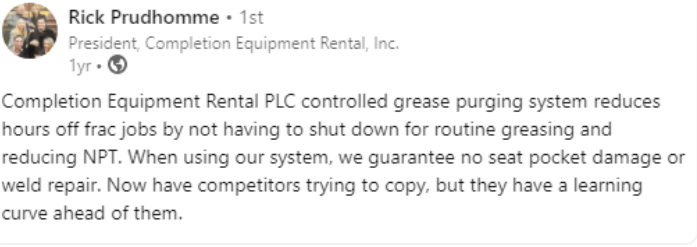
12. Defendant CER, without authority, consent, or license from Knott, has infringed and is still infringing the Knott Patents by making, using, importing, leasing, selling, or offering to sell, lease or use the Infringing Product.

13. Defendant directly or through intermediaries distributes, provides, supplies, offers for sale, sells, leases, markets, advertises, and otherwise provides portable grease lubrication units that infringe one or more claims of the ‘891 Patent.

14. Defendant has directly infringed, and is directly infringing, literally or under the doctrine of equivalents one or more claims of the ‘891 Patent in this judicial district, in the State of Texas, and elsewhere in the United States. All elements of – at least – claim 1 of the ‘891 Patent are present within the structure and/or operation or method of Defendant’s Infringing Products:

CLAIM 1 OF ‘891 PATENT	DEFENDANT’S INFRINGING PRODUCT
<p>A method for pre-pressurizing a valve, comprising:</p>	<p>The CER Remote Greasing Units with “Remote Grease Purging System” or “Remote Grease Units” are portable lubrication units and provide pre-pressurizing and servicing valves during fracturing operations.</p> <p>The CER online brochure describes the system as a “streamlined technology to decrease valve damage and routine greasing” and states that the “system provides a step change in valve performance by reducing valve damages cause [sic] during fracturing operations while also improving HSE.”</p>





CLAIM 1 OF '891 PATENT	DEFENDANT'S INFRINGING PRODUCT
	<p>According to CER's website, the system "[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs."</p> <p>The valve purging system "[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and chemicals from entering valve cavity, reducing damages to zipper and frac tree."</p> <p>"[T]he Grease Purging System provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time. This allows: (1) valves to remain full of grease (2) keeps sand, debris, and corrosive chemicals from entering the cavity, (3) reduces damage to internal parts and valve repair charges, and (4) shortens transition times and reduces nonproductive time by eliminating the need for routine greasing."</p> <div data-bbox="639 1125 1398 1440" style="border: 1px solid black; padding: 5px;">  <p><b>Rick Prudhomme</b> • 1st President, Completion Equipment Rental, Inc. 1yr • 🌐</p> <p>Completion Equipment Rental PLC controlled grease purging system reduces hours off frac jobs by not having to shut down for routine greasing and reducing NPT. When using our system, we guarantee no seat pocket damage or weld repair. Now have competitors trying to copy, but they have a learning curve ahead of them.</p> <p>👍 2</p> </div>
<p>placing a lubricant pressurization system onto a portable platform, the lubricant pressurization system comprising:</p>	<p>The CER "Remote Grease Purging System" has a portable platform for transporting the portable lubrication system to the wellsite.</p>
<p>an air compressor;</p>	<p>The CER portable lubrication unit has an air compressor. An air compressor is not mentioned in the publicly available information but would be present in an automated and "controlled" grease lubrication system.</p>



CLAIM 1 OF '891 PATENT	DEFENDANT'S INFRINGING PRODUCT
	<p>The system “[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs.”</p> <p>The valve purging system “[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and chemicals from entering valve cavity, reducing damages to zipper and frac tree.”</p> <p>As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time.”</p> <p>“[T]he Grease Purging System provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time.”</p>
<p>a lubricant reservoir and associated fluid pump;</p>	<p>The CER portable lubrication unit includes a lubricant reservoir and pneumatic grease pump powered by an air compressor:</p> <p>The system “[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs.”</p> <p>The valve purging system “[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and chemicals from entering valve cavity, reducing damages to zipper and frac tree.”</p> <p>“[T]he Grease Purging System provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time.”</p> <p>“Valves remain full of grease” and “Eliminates need for routing greasing”</p>

CLAIM 1 OF '891 PATENT	DEFENDANT'S INFRINGING PRODUCT
	An air compressor is not mentioned in the publicly available information but would be present in an automated and "controlled" system.
a high pressure air hose for delivering compressed air from the air compressor to the lubricant reservoir; and	<p>The CER portable lubrication unit has an air hose for delivering the compressed air from the air compressor to the lubricant reservoir.</p> <p>According to CER's website, the system "[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs."</p> <p>The valve purging system "[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and chemicals from entering valve cavity, reducing damages to zipper and frac tree."</p>
a high pressure lubricant line;	<p>The CER portable lubrication unit has a high pressure lubricant line.</p> <p>The system "[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs."</p>
moving the portable platform with the lubricant pressurization system to a well site;	The CER portable lubrication unit is transported to the well site on a portable platform.
placing the high pressure lubricant line in fluid communication with one or more fluid control valves associated with a frac tree placed over a wellbore;	<p>The CER portable lubrication unit has a high pressure lubricant line placed in fluid communication with one or more fluid valves associated with a frac tree placed over a wellbore.</p> <p>The system "[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs."</p> <p>The valve purging system "[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and chemicals from entering valve cavity, reducing damages to zipper and frac tree."</p> <p>"[T]he Grease Purging System provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease</p>

CLAIM 1 OF '891 PATENT	DEFENDANT'S INFRINGING PRODUCT
	<p data-bbox="618 289 1370 359">pressure, normally 20-30 PSI above fracturing pressure, in real-time.”</p> <div data-bbox="639 394 1399 1037"><p data-bbox="664 409 1357 464">COMPLETIONRENTAL.COM, including our new innovative valve purging system. #haynesville #fracvalves #zipperfrac</p></div> <div data-bbox="699 1075 1338 1793"><p data-bbox="711 1094 1170 1157"><b>Ryan Peterson</b> • 2nd Senior Business Development Representative - Universal WTX 1yr •</p><p data-bbox="711 1165 1276 1213">Completion Equipment Rental specializes in Frac Trees, 7" Singeline, Zipper Manifolds, and Pump Down!</p><p data-bbox="711 1239 1256 1310">With our revolutionary Grease Purging System, Inconel Cladding, and Competitive pricing, allow us the opportunity to prove our value to your completion program and participate in your next RFP.</p><p data-bbox="711 1335 902 1381">Our website is below: <a href="https://lnkd.in/guPZ6y8">https://lnkd.in/guPZ6y8</a></p><p data-bbox="711 1407 1195 1430">Service Facilities in Midland TX, Kilgore TX, and George West TX.</p></div>

CLAIM 1 OF '891 PATENT	DEFENDANT'S INFRINGING PRODUCT
<p>actuating the air compressor to power the fluid pump and to pressurize the lubricant within the high pressure lubricant line;</p>	<p>The CER portable lubrication unit includes an air compressor that is actuated to power the fluid pump and to pressurize the lubricant within the high pressure lubricant line.</p> <p>The system “[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs.”</p> <p>The valve purging system “[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and chemicals from entering valve cavity, reducing damages to zipper and frac tree.”</p> <p>“[T]he Grease Purging System provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time.”</p> <p>Programable Logic Controller adjusts grease pressure in real-time” and “Programable Logic Controller records Frac pressures in real-time”</p>
<p>moving gates associated with the one or more fluid control valves into their open positions;</p>	<p>In the CER portable lubrication unit, the gates associated with the one or more fluid control valves (gate valves) are moved into their open positions. The vast majority of the frac valves used in the industry are gate valves.</p> <p>The system “[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs.”</p> <p>“Shortens transition times”</p> <p>The system “[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs.”</p> <p>The valve purging system “[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and chemicals from entering valve cavity, reducing damages to zipper and frac tree.”</p>

CLAIM 1 OF '891 PATENT	DEFENDANT'S INFRINGING PRODUCT
	<p>“[T]he Grease Purging System provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time.”</p>
<p>injecting lubricating fluid from the high pressure lubricant line into a cavity of each of the fluid control valves in order to pre-pressurize the respective cavities to a pressure of at least a determined formation fracturing pressure for a wellbore at the wellsite;</p>	<p>The lubricating fluid from the high pressure lubricant line is injected into the cavity of each of the fluid control valves (gate valves) in order to pre-pressurize the responsive cavities to a pressure of at least a determined formation fracturing pressure for a wellbore at the wellsite.</p> <p>The system “[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs.”</p> <p>The valve purging system “[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and chemicals from entering valve cavity, reducing damages to zipper and frac tree.”</p> <p>“[T]he Grease Purging System provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time.”</p>
<p>after the pre-pressurizing, injecting a hydraulic fracturing fluid down a central bore of the fracturing tree and down flow channels of the one or more fluid control valves while the respective cavities are packed with the lubricating fluid; and</p>	<p>After the pre-pressurizing, a hydraulic fracturing fluid is injected down the central bore of the fracturing tree and down the flow channels of one or more fluid control valves while the respective cavities are packed with the lubricating fluid.</p> <p>The system “[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs.”</p> <p>The valve purging system “[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and chemicals from entering valve cavity, reducing damages to zipper and frac tree.”</p> <p>“[T]he Grease Purging System provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate,</p>

CLAIM 1 OF '891 PATENT	DEFENDANT'S INFRINGING PRODUCT
	the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time.”
maintaining the pressure in the high pressure lubricant line while injecting the hydraulic fracturing fluid through the one or more fluid control valves and down the wellbore.	<p>In the CER portable lubrication unit, the pressure in the high pressure lubricant line is maintained while hydraulic fracturing fluid is injected through one or more of the fluid control valves (gate valves) and down the wellbore.</p> <p>The system “[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs.”</p> <p>The valve purging system “[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and chemicals from entering valve cavity, reducing damages to zipper and frac tree.”</p> <p>“[T]he Grease Purging System provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time.”</p>

15. Defendant’s Infringing Product satisfies each element of Claim 1 of the ‘891 Patent; and therefore, directly and literally, or under the doctrine of equivalents, infringes the ‘891 Patent. Defendant’s Infringing Products also similarly infringe, directly and literally or under the doctrine of equivalents, other claims of the ‘891 Patent.

16. Defendant has infringed, and is infringing the ‘891 Patent, either literally or under the doctrine of equivalents, without the consent or authorization of Plaintiff Knott, by making, using, offering for sale, selling, and /or leasing the accused instrumentalities. Defendant has engaged in these activities within this judicial district, the State of Texas, and elsewhere in the United States, without the consent of Plaintiff Knott.

17. Defendant also infringes under 35 U.S.C. § 271(b) and (c) by inducing and/or contributing to infringement of the '891 Patent in this judicial district, the State of Texas, and elsewhere in the United States, literally or under the doctrine of equivalents, by, among other things, performing certain elements of the methods and systems claimed by the '891 Patent, and advising, encouraging, contributing, or otherwise inducing others to perform the remaining elements claimed by the '891 Patent to the injury of Plaintiff Knott.

18. Plaintiff Knott is entitled to recover from Defendant the damages sustained by Knott from the Defendant's infringing conduct, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284. Plaintiff Knott requests compensation for Defendant's past infringement and for any future infringement.

**COUNT II: INFRINGEMENT OF THE '906 PATENT**


19. Knott refers to and incorporates herein the allegations of Paragraphs 1 through 18 above.

20. Defendant CER, without authority, consent, or license from Knott, has infringed and is still infringing the Knott Patents by making, using, importing, leasing, selling, or offering to sell, lease or use the Infringing Product.

21. Defendant directly or through intermediaries distributes, provides, supplies, offers for sale, sells, leases, markets, advertises, and otherwise provides portable grease lubrication units that infringe one or more claims of the '906 Patent.

22. Defendant has directly infringed, and is directly infringing, literally or under the doctrine of equivalents one or more claims of the '906 Patent in this judicial district, in the State of Texas, and elsewhere in the United States. All elements of – at least – claim 1 of the '906 Patent are present within the structure and/or operation or method of Defendant's Infringing Products:






CLAIM 1 OF '906 PATENT	DEFENDANT'S INFRINGING PRODUCT
<p>A portable lubrication unit, comprising:</p>	<p>Completion Equipment Rental, Inc. ("CER") offers Remote Greasing Units with "Remote Grease Purging System" or "Remote Grease Units for servicing valves during fracturing operations.</p> <p>The CER online brochure describes the system as a "streamlined technology to decrease valve damage and routine greasing" and states that the "system provides a step change in valve performance by reducing valve damages cause [sic] during fracturing operations while also improving HSE."</p> <p>According to CER's website, the system "[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs."</p> <p>The valve purging system "[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and chemicals from entering valve cavity, reducing damages to zipper and frac tree."</p> <p>"[T]he Grease Purging System provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time. This allow: (1) valves to remain full of grease (2) keeps sand, debris, and corrosive chemicals from entering the cavity, (3) reduces damage to internal parts and valve repair charges, and (4) shortens transition times and reduces nonproductive time by eliminating the need for routine greasing."</p> <div data-bbox="639 1528 1396 1839" style="border: 1px solid black; padding: 5px;">  <p><b>Rick Prudhomme</b> • 1st President, Completion Equipment Rental, Inc. 1yr • </p> <p>Completion Equipment Rental PLC controlled grease purging system reduces hours off frac jobs by not having to shut down for routine greasing and reducing NPT. When using our system, we guarantee no seat pocket damage or weld repair. Now have competitors trying to copy, but they have a learning curve ahead of them.</p> <p> 2</p> </div>

CLAIM 1 OF '906 PATENT	DEFENDANT'S INFRINGING PRODUCT
a portable platform;	The CER "Remote Grease Purging System" has a portable platform:
an air compressor;	<p>The CER portable lubrication unit has an air compressor. An air compressor is not mentioned in the publicly available information, but would be present in an automated and "controlled" grease lubrication system.</p> <p>The system "[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs."</p> <p>The valve purging system "[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and chemicals from entering valve cavity, reducing damages to zipper and frac tree."</p> <p>As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time."</p> <p>"[T]he Grease Purging System provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time."</p>
a lubricant reservoir and associated fluid pump powered by the air compressor	<p>The CER portable lubrication unit includes a lubricant reservoir and pneumatic grease pump powered by an air compressor:</p> <p>The system "[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs."</p> <p>The valve purging system "[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and chemicals from entering valve cavity, reducing damages to zipper and frac tree."</p>

CLAIM 1 OF '906 PATENT	DEFENDANT'S INFRINGING PRODUCT
	<p>“[T]he Grease Purging System provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time.”</p> <p>“Valves remain full of grease” and “Eliminates need for routing greasing”</p> <p>An air compressor is not mentioned in the publicly available information, but would be present in an automated and “controlled” system.</p>
via an air hose;	<p>The CER portable lubrication unit has an air hose:</p> <p>According to CER’s website, the system “[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs.”</p> <p>The valve purging system “[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and chemicals from entering valve cavity, reducing damages to zipper and frac tree.”</p>
a first pressure regulator switch along the air hose;	<p>The CER portable lubrication unit has a first pressure regulator switch along the air hose:</p> <p>The system “[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs.”</p> <p>The valve purging system “[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and chemicals from entering valve cavity, reducing damages to zipper and frac tree.”</p> <p>“[T]he Grease Purging System provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease</p>

CLAIM 1 OF '906 PATENT	DEFENDANT'S INFRINGING PRODUCT
	<p>pressure, normally 20-30 PSI above fracturing pressure, in real-time.”</p> <p>Programable Logic Controller adjusts grease pressure in real-time” and “Programable Logic Controller records Frac pressures in real-time”</p>
<p>a high pressure air hose for delivering compressed air from the air compressor to the fluid pump when the air compressor is actuated;</p>	<p>The CER portable lubrication unit has a high pressure air hose for delivering the compressed air from the air compressor to the fluid pump when the air compressor is actuated:</p> <p>The system “[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs.”</p> <p>The valve purging system “[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and chemicals from entering valve cavity, reducing damages to zipper and frac tree.”</p> <p>“[T]he Grease Purging System provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time.”</p> <p>An air compressor and a “high pressure air hose” is not mentioned in the publicly available information, but would be present in an automated greasing system. The grease pump that delivers the grease under pressure is pneumatic which requires an air compressor to drive the pump.</p>
<p>a high pressure lubricant line configured to be fluidically connected at one end to the lubricant reservoir, and at a second opposite end to a plurality of lube channels associated with fluid control valves along a fracturing tree placed over a wellbore at a wellsite; and</p>	<p>The CER portable lubrication unit has a high pressure lubricant line configured to be fluidically connected at one end to the lubricant reservoir, and at a second opposite end to a plurality of lube channels associated with fluid control valves along a fracturing tree placed over a wellbore at a wellsite.</p> <p>The system “[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs.”</p> <p>The valve purging system “[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and</p>

CLAIM 1 OF '906 PATENT	DEFENDANT'S INFRINGING PRODUCT
	<p>chemicals from entering valve cavity, reducing damages to zipper and frac tree.”</p> <p>“[T]he Grease Purging System provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time.”</p> <div data-bbox="639 653 1401 1293"><p>COMPLETIONRENTAL.COM, including our new innovative valve purging system. #haynesville #fracvalves #zipperfrac</p>An aerial photograph of an industrial site, likely a wellhead or valve area. The ground is light-colored and sandy. In the center, there is a complex arrangement of yellow and blue machinery, including what appears to be a valve or wellhead assembly. Several large white trucks and smaller vehicles are parked around the site. Numerous black cables or hoses are laid out across the ground, connecting different pieces of equipment. The overall scene depicts a busy industrial operation.</div>

CLAIM 1 OF '906 PATENT	DEFENDANT'S INFRINGING PRODUCT
	<div data-bbox="699 289 1338 1003" style="border: 1px solid black; padding: 5px;">  <p><b>Ryan Peterson</b> • 2nd Senior Business Development Representative - Universal WTX 1yr • 6</p> <p>Completion Equipment Rental specializes in Frac Trees, 7" Singeline, Zipper Manifolds, and Pump Down!</p> <p>With our revolutionary Grease Purging System, Inconel Cladding, and Competitive pricing, allow us the opportunity to prove our value to your completion program and participate in your next RFP.</p> <p>Our website is below: <a href="https://lnkd.in/guPZ6y8">https://lnkd.in/guPZ6y8</a></p> <p>Service Facilities in Midland TX, Kilgore TX, and George West TX.</p>  </div>
<p>a second pressure regulator switch along the high pressure lubricant line, configured to send a signal when a pre-set pressure along the lubricant line is exceeded;</p>	<p>The CER portable lubrication unit includes a second pressure regulator switch along the high pressure lubricant line, configured to send a signal when a preset pressure along the line is exceeded.</p> <p>The system “[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs.”</p> <p>The valve purging system “[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and chemicals from entering valve cavity, reducing damages to zipper and frac tree.”</p> <p>“[T]he Grease Purging System provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time.”</p>

CLAIM 1 OF '906 PATENT	DEFENDANT'S INFRINGING PRODUCT
	<p>Programable Logic Controller adjusts grease pressure in real-time” and “Programable Logic Controller records Frac pressures in real-time”</p>
<p>wherein: the air compressor, the lubricant reservoir and the high pressure air hose reside on the portable platform;</p>	<p>The CER lubrication unit includes an air compressor, the lubricant reservoir and the high pressure air hoses which reside on the portable platform.</p> <p>The system “[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs.”</p> <p>“Shortens transition times” and “minimal footprint on location”</p> <div data-bbox="870 800 1167 1136" data-label="Image"> <p style="text-align: center;">Grease Purge System</p> </div> <div data-bbox="729 1173 1310 1663" data-label="Image"> <p>COMPLETIONRENTAL.COM, including our new innovative valve purging system. #haynesville #fracvalves #zipperfrac</p> </div>



CLAIM 1 OF '906 PATENT	DEFENDANT'S INFRINGING PRODUCT
	<div data-bbox="735 289 1305 926" style="border: 1px solid black; padding: 5px;">  <p>Ryan Peterson • 2nd Senior Business Development Representative - Universal WTX 1yr •</p> <p>Completion Equipment Rental specializes in Frac Trees, 7" Singeline, Zipper Manifolds, and Pump Down!</p> <p>With our revolutionary Grease Purging System, Inconel Cladding, and Competitive pricing, allow us the opportunity to prove our value to your completion program and participate in your next RFP.</p> <p>Our website is below: <a href="https://lnkd.in/guPZ6y8">https://lnkd.in/guPZ6y8</a></p> <p>Service Facilities in Midland TX, Kilgore TX, and George West TX.</p>  </div> <p>An air compressor and a “high pressure air hose” is not specifically mentioned in the publicly available information, but would be present in an automated greasing system.</p>
<p>the air compressor is configured such that, upon actuation, lubricant is carried through the high pressure lubricant line, to the connected lube channels, and into cavities associated with each of the fluid control valves in order to pre-pressurize the respective cavities to a pressure of at least a determined formation fracturing pressure for the wellbore.</p>	<p>The CER lubrication unit’s air compressor is configured such that, upon actuation, lubricant is carried through the high pressure lubricant line, to the connected lube channels and into cavities associated with each of the fluid control valves in order to pre-pressurize the respective cavities to a pressure of at least a determined formation fracturing pressure for the wellbore</p> <p>The system “[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs.”</p> <p>The valve purging system “[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and chemicals from entering valve cavity, reducing damages to zipper and frac tree.”</p> <p>“[T]he Grease Purging System provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease</p>

CLAIM 1 OF '906 PATENT	DEFENDANT'S INFRINGING PRODUCT
	<p>pressure, normally 20-30 PSI above fracturing pressure, in real-time.”</p> <p>An air compressor and a “high pressure lubricant line” is not mentioned in the publicly available information, but would be present in an automated greasing system.</p>

23. Defendant's Infringing Product satisfies each element of Claim 1 of the '906 Patent; and therefore, directly and literally, or under the doctrine of equivalents, infringes the '906 Patent. Defendant's Infringing Products also similarly infringe, directly and literally or under the doctrine of equivalents, other claims of the '906 Patent.

24. Defendant has infringed, and is infringing the '906 Patent, either literally or under the doctrine of equivalents, without the consent or authorization of Plaintiff Knott, by making, using, offering for sale, selling, and /or leasing the accused instrumentalities. Defendant has engaged in these activities within this judicial district, the State of Texas, and elsewhere in the United States, without the consent of Plaintiff Knott.

25. Defendant also infringes under 35 U.S.C. § 271(b) and (c) by inducing and/or contributing to infringement of the '906 Patent in this judicial district, the State of Texas, and elsewhere in the United States, literally or under the doctrine of equivalents, by, among other things, performing certain elements of the methods and systems claimed by the '906 Patent, and advising, encouraging, contributing, or otherwise inducing others to perform the remaining elements claimed by the '906 Patent to the injury of Plaintiff Knott.

26. Plaintiff Knott is entitled to recover from Defendant the damages sustained by Knott from the Defendant's infringing conduct, which, by law, cannot be less than a reasonable

royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284. Plaintiff Knott requests compensation for Defendant’s past infringement and for any future infringement.

**COUNT III: INFRINGEMENT OF THE ‘888 PATENT**

23. Plaintiff Knott refers to and incorporates herein the allegations of Paragraphs 1 through 18 above.

24. Defendant directly or through intermediaries distributes, provides, supplies, offers for sale, sells, leases, markets, advertises, and otherwise provides portable grease lubrication units that infringe one or more claims of the ‘888 Patent.


25. Defendant has directly infringed, and is directly infringing, literally or under the doctrine of equivalents one or more claims of the ‘888 Patent in this judicial district, in the State of Texas, and elsewhere in the United States. All elements of – at least – claim 1 of the ‘906 Patent are present within the structure and/or method of Defendant’s Infringing Products:

CLAIM 1 OF ‘888 PATENT	DEFENDANT’S INFRINGING PRODUCT
<p>A method of pressurizing at least one fluid control valve, comprising the steps of:</p>	<p>The CER Remote Greasing Unit with “Remote Grease Purging System” provides a method of pressurizing at least one fluid control valve.</p> <p>The CER online brochure describes the system as a “streamlined technology to decrease valve damage and routine greasing” and states that the “system provides a step change in valve performance by reducing valve damages cause [sic] during fracturing operations while also improving HSE.”</p> <p>According to CER’s website, the system “[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs.”</p> <p>The valve purging system “[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and chemicals from entering valve cavity, reducing damages to zipper and frac tree.”</p>

CLAIM 1 OF '888 PATENT	DEFENDANT'S INFRINGING PRODUCT
	<p>“[T]he Grease Purging System provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time. This allow: (1) valves to remain full of grease (2) keeps sand, debris, and corrosive chemicals from entering the cavity, (3) reduces damage to internal parts and valve repair charges, and (4) shortens transition times and reduces nonproductive time by eliminating the need for routine greasing.”</p> <div data-bbox="646 766 1364 1060" style="border: 1px solid black; padding: 5px;">  </div>
<p>providing at least one fluid control valve along either a hydraulic fracturing tree or a zipper frac manifold, with the at least one fluid control valve having:</p>	<p>The CER portable lubrication unit pressurizes at least one fluid control valve by providing at least one fluid control valve along either a hydraulic fracturing tree or a zipper frac manifold, with the fluid control valve having:</p> <p>CER offers Remote Greasing Units with “Remote Grease Purging System” or “Remote Grease Units for servicing valves during fracturing operations.</p> <p>The CER online brochure describes the system as a “streamlined technology to decrease valve damage and routine greasing” and states that the “system provides a step change in valve performance by reducing valve damages cause [sic] during fracturing operations while also improving HSE.”</p>
<p>a body with an internal gate cavity,</p>	<p>The fluid control valve has a body with an internal gate cavity. The vast majority of the frac valves in the industry are gate valves. The gate valve referenced here is the internal cavity of the gate valve.</p>

CLAIM 1 OF '888 PATENT	DEFENDANT'S INFRINGING PRODUCT
	<p>“[T]he Grease Purging System provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time.”</p>
<p>a gate movably mounted within the gate cavity for movement between a gate open position and a gate closed position, the gate in combination with the body defining an upper pocket and a lower pocket,</p>	<p>The fluid control valve (gate valve) has a gate movably mounted within the gate cavity for movement between a gate open position and a gate closed position, the gate in combination with the body defining an upper pocket and lower pocket. This describes an inherent and necessary feature of the gate valve.</p>
<p>a stem coupled to the gate,</p>	<p>The fluid control valve (gate valve) has a stem coupled to the gate. This describes an inherent and necessary feature of the valve, a stem coupled to the gate to move the gate from open to closed positions. Both manual and hydraulic valves will have a stem connected to the gate.</p> <p>“[T]he Grease Purging System provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time.”</p>
<p>an actuator operatively coupled to the stem,</p>	<p>There is an actuator operatively coupled to the stem of the fluid control valve (gate valve). This is a necessary component for operation of the valve. The manual actuator would have a handwheel and the hydraulic actuator would have a hydraulic cylinder.</p>
<p>an upper lube channel extending through the body and in fluid communication with the upper pocket,</p>	<p>The fluid control valve has an upper lube channel extending through the body and is in fluid communication with the upper pocket. This is a necessary feature or structure for greasing operations. The upper lube channel which extends through the body can be seen at the grease fitting on one end of the valve. This is where one of the two grease lines ties into the gate valve.</p>
<p>a lower lube channel extending through the body and</p>	<p>The fluid control valve has a lower lube channel extending through the body and is in fluid communication with the</p>

CLAIM 1 OF '888 PATENT	DEFENDANT'S INFRINGING PRODUCT
in fluid communication with the lower pocket,	lower pocket. This is a necessary feature or structure for greasing operations. The lower lube channel which extends through the body can be seen at the grease fitting on the other end of the valve. This is where the second grease line ties into the valve.
an upper lube fitting coupled to the upper lube channel,	The fluid control valve has an upper lube fitting coupled to the upper lube channel. This is a necessary feature or structure for greasing operations. This is the grease fitting of the valve.
a lower lube fitting coupled to the lower lube channel,	The fluid control valve has a lower lube fitting coupled to the lower lube channel. This is a necessary feature or structure for greasing operations. This is the second grease fitting of the valve.
a high pressure pump,	<p>The CER portable lubrication unit has a high pressure pump. To achieve the pressure described, a high pressure pump would be required. The term "grease unit" means that there is a high pressure pump.</p> <p>The system "[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes <u>grease unit</u>, manifold, hoses, and grease is charged per lbs."</p> <p>The valve purging system "[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and chemicals from entering valve cavity, reducing damages to zipper and frac tree."</p> <p>As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time."</p> <p>"[T]he Grease Purging System provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time."</p>
and at least one high pressure lubricant line extending from the high pressure pump and	The CER portable lubrication unit has at least one high pressure lubricant line extending from the high pressure pump and fluidically coupled to both the upper lube fitting

CLAIM 1 OF '888 PATENT	DEFENDANT'S INFRINGING PRODUCT
<p>fluidically coupled to both the upper lube fitting and the lower lube fitting;</p>	<p>and the lower lube fitting. The CER unit has “manifold, hoses,” and that term describes this element or feature.</p> <p>“Valves remain full of grease” and “Eliminates need for routing greasing”</p> <p>According to CER’s website, the system “[h]olds grease pressure during fracs, keeping sand and frac fluids out of valves and reducing damages. Includes grease unit, manifold, hoses, and grease is charged per lbs.”</p> <div data-bbox="646 695 1406 1335" style="border: 1px solid black; padding: 5px;"> <p>COMPLETIONRENTAL.COM, including our new innovative valve purging system. #haynesville #fracvalves #zipperfrac</p>  </div>
<p>determining a downhole formation parting pressure for a subsurface formation;</p>	<p>The CER portable lubrication unit determines a downhole formation parting pressure for a subsurface formation. “Parting pressure” for a subsurface formation is the “frac pumping pressure.”</p> <p>The valve purging system “[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and chemicals from entering valve cavity, reducing damages to zipper and frac tree.”</p>
<p>actuating the actuator to move the stem to place the at least one fluid control valve in its gate open position;</p>	<p>The CER portable lubrication unit and method actuates the actuator to move the valve stem to place the gate valve in its gate open position. In order for the CER system to maintain</p>



CLAIM 1 OF '888 PATENT	DEFENDANT'S INFRINGING PRODUCT
	<p>a continuous purge during fracturing operations, the valve must be in the gate open position.</p> <p>“[T]he Grease Purging System provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time.”</p>
<p>actuating the high pressure pump to pressurize a lubricating fluid to a pressure above the surface pressure required to achieve the downhole formation parting pressure; and</p>	<p>The CER portable lubrication unit and method actuates the high pressure pump to pressurize a lubricating fluid to a pressure above the surface pressure required to achieve the downhole formation parting pressure.</p> <p>The valve purging system “[s]upplies a positive grease pressure above frac pumping pressure, keeping sand and chemicals from entering valve cavity, reducing damages to zipper and frac tree.”</p>
<p>passing the pressurized lubricating fluid from the high pressure pump, through the at least one high pressure lubricant line, into both the upper lube fitting and the lower lube fitting, and through the upper lube channel and the lower lube channel to pressurize the gate cavity with the lubricating fluid prior to passing a fracturing fluid through a flow passage within each of the at least one control valve and down into a subsurface wellbore.</p>	<p>The CER portable lubrication unit and method passes the pressurized lubricating fluid from the high pressure pump, through at least one high pressure line, into both the upper lube fitting and the lower lube fitting, and through the upper lube channel and the lower lube channel to pressurize the gate cavity with the lubricating fluid prior to passing a frac fluid through a flow passage within the fluid control valve and down into a subsurface wellbore.</p> <p>“[T]he Grease Purging System provides a grease pressure in the valve cavity enabling it to maintain a continue purge during fracturing operations. As fracturing pressure fluctuate, the Grease Purging System maintains a positive grease pressure, normally 20-30 PSI above fracturing pressure, in real-time.”</p> <p>“Actuating the high pressure pump” is present in the Infringing Products because the system has to work in order to supply the grease pressure (lubricating fluid).</p> <p>The pressure above the surface pressure required to achieve the downhole formation parting pressure is described by CER as the “20-30 PIS above fracturing pressure.” At least one high pressure lubricant line is described with the terms, “manifold, hoses.”</p>

CLAIM 1 OF '888 PATENT	DEFENDANT'S INFRINGING PRODUCT
	<p>The gate valves have fittings, i.e., the upper lube fitting and the lower lube fitting.</p> <p>The gate valve has the upper lube channel and the lower lube channel, and for the system to work, CER must tie into both ports of the valve.</p>

26. Defendant's Infringing Product satisfies each element of Claim 1 of the '888 Patent; and therefore, directly and literally, or under the doctrine of equivalents, infringes the '888 Patent. Defendant's Infringing Products also similarly infringe, directly and literally or under the doctrine of equivalents, other claims of the '906 Patent.

27. Defendant has infringed, and is infringing the '888 Patent, either literally or under the doctrine of equivalents, without the consent or authorization of Plaintiff Knott, by making, using, offering for sale, selling, and /or leasing the accused instrumentalities. Defendant has engaged in these activities within this judicial district, the State of Texas, and elsewhere in the United States, without the consent of Plaintiff Knott.

28. Defendant also infringes under 35 U.S.C. § 271(b) and (c) by inducing and/or contributing to infringement of the '888 Patent in this judicial district, the State of Texas, and elsewhere in the United States, literally or under the doctrine of equivalents, by, among other things, performing certain elements of the methods and systems claimed by the '888 Patent, and advising, encouraging, contributing, or otherwise inducing others to perform the remaining elements claimed by the '888 Patent to the injury of Plaintiff Knott.

29. Plaintiff Knott is entitled to recover from Defendant the damages sustained by Knott as a result of Defendant's infringing conduct, which, by law, cannot be less than a reasonable

royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284. Plaintiff Knott requests compensation for Defendant's past infringement and for any future infringement.

**JURY TRIAL**

30. Pursuant to Fed. R. Civ. P. 38 and 39, Plaintiff Knott hereby demands a trial by jury.

**PRAYER**

WHEREFORE, Plaintiff Christopher M. Knott, prays that the Court grant the following relief against Defendant Completions Equipment Rentals, Inc.:

A. Judgment in favor of Plaintiff Christopher M. Knott, and against Completions Equipment Rentals, Inc. for infringement of the '891 Patent, '906 Patent and '888 Patent;

B. Damages against Completion Equipment Rentals, Inc., adequate to compensate Christopher M. Knott, for such acts of infringement;

C. Reasonable attorneys' fees in accordance with 35 U.S.C. § 285;

D. Award of Interest and costs; and

E. Such other and further relief as is just and proper.

Respectfully submitted

ANDERSON & CUNNINGHAM, P.C.

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