

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PROVISUR TECHNOLOGIES, INC.,

Petitioner,

v.

TEXTOR MASCHINENBAU GMBH,

Patent Owner

Case IPR2024-00224
U.S. Patent No. 9,457,487

PATENT OWNER'S REPLY IN SUPPORT OF THE MOTION TO AMEND

TABLE OF CONTENTS

I.	REQUEST TO RENUMBER THE AMENDED CLAIMS AND MAKE THE CLAIM 22 AMENDMENT NON-CONTINGENT	1
II.	PATENT OWNER CLAIMS THE PRIORITY DATE OF THE ORIGINAL APPLICATION	1
III.	THE AMENDED CLAIMS REQUIRE SECURING THE CONVEYOR BELT UNITS FOR OPERATION	2
IV.	PETITIONER’S PROPOSED GROUNDS DO NOT ANTICIPATE OR RENDER OBVIOUS THE TOOLLESS REMOVAL/INSTALLATION	2
A.	GROUNDS 1-4 FAIL: McLAUGHLIN AND KONISHI WOULD REQUIRE PHYSICAL SECURING MECHANISMS	3
B.	DR. COLLINS’S ANALYSIS IS FATALLY FLAWED	4
	1. <i>Operational Forces are Not Accounted For.....</i>	<i>5</i>
	2. <i>Friction Forces Would Not be Relied on By a POSITA</i>	<i>6</i>
	3. <i>Dr. Collins Fails to Apply a Proper Coefficient of Friction</i>	<i>7</i>
	4. <i>Dr. Collins Does Not Apply Plausible Reactionary Forces for Konishi</i>	<i>7</i>
V.	THE NEW COMBINATIONS ALSO FAIL—NEITHER HERMAN NOR MATHUES TEACH LATCHES THAT SECURE AGAINST THE FORCES AT ISSUE	8
A.	GENERAL ISSUES WITH IMPLEMENTING LATCHES ON KONISHI AND McLAUGHLIN	8
B.	HERMAN’S LATCH DOES NOT SECURE AGAINST X-Y OPERATIONAL FORCES	9
C.	MATHUES’S LATCH DOES NOT SECURE AGAINST OPERATIONAL FORCES REQUIRED TO SECURE KONISHI’S CONVEYOR UNIT	10
VI.	CONCLUSION.....	12

I. REQUEST TO RENUMBER THE AMENDED CLAIMS AND MAKE THE CLAIM 22 AMENDMENT NON-CONTINGENT

In the Motion to Amend (“MTA”), Patent Owner (“PO”) proposed amending all Challenged Claims to include the limitation in Claim 16. To avoid duplication, it proposed cancelling Claim 16, which was identical to proposed replacement Claim 25.

In the parallel litigation, Petitioner filed a motion to dismiss based on the proposed Claim 16 cancellation. The district court denied this motion, but Petitioner had indicated it intends to raise the issue again. To avoid unnecessary motion practice and wasted party and court resources, PO asks that the Board permit a clerical change to the MTA. Namely, PO seeks to cancel independent Claim 1, preserving Claim 16 in its existing form and scope, including the underlying limitations of Claim 1. All other challenged claims that originally depended on Claim 1 will now depend on Claim 16. These changes are clerical only and do not modify the scope of the originally submitted claim amendments. These changes are shown in Appendix A, and Appendix B shows a clean version of the currently proposed amendments.

Further, to limit the disputed issue, PO asks that the Board make replacement of claim 22 non-contingent. This change is also reflected in Appendices A and B.

II. PATENT OWNER CLAIMS THE PRIORITY DATE OF THE ORIGINAL APPLICATION

Petitioner incorrectly asserts that by not citing the original German priority application, PO has agreed the amended claims are not entitled to this date. Paper 34,

27-28. The translated German and US applications are identical, except for minor housekeeping edits. *See* Ex. 1002, 417-443 (showing redlines between translated German and U.S. applications). PO claims and is entitled priority to the German application, citing the same paragraphs as the U.S. application.

III. THE AMENDED CLAIMS REQUIRE SECURING THE CONVEYOR BELT UNITS FOR OPERATION

It is unclear from the Board's Preliminary Guidance whether it is interpreting a conveyor belt unit "configured to be removed and/or installed without tools" (the "Toolless Limitation") in the same way as the parties. For clarity, the Toolless Limitation does not simply require a conveyor unit to move into and out of its operational location without tools. Rather, Petitioner must prove that transitioning between an operational state and a removed state without tools was anticipated or obvious. As set forth in the concurrently filed Sur-Reply, the parties appear to agree on this claim interpretation. *Sur-Reply*, 4-5.

IV. PETITIONER'S PROPOSED GROUNDS DO NOT ANTICIPATE OR RENDER OBVIOUS THE TOOLLESS REMOVAL/INSTALLATION

The Proposed Grounds fall into two buckets. First, Petitioner contends that originally presented Grounds 1-4 anticipate or render obvious the amended claims. As Dr. Collins confirmed, each of these Grounds relies on a theory that the conveyor belts described by Konishi and McLaughlin require no additional physical securing and would be held in place during operation by weight and friction alone. Second,

contrasting the exclusive reliance on Konishi and McLaughlin for Grounds 1-4, Grounds 5-6 modify Konishi and McLaughlin with physical securing mechanisms from new secondary references, Herman and Mathues.

As set forth below, each Proposed Ground fails. For Grounds 1-4, the record disputes that a POSITA would have interpreted Konishi and McLaughlin to describe conveyor units that could be left without physical securing. Only PO relies on concrete evidence of how conveyor units of this type are implemented in the field, which shows they are *always* secured with tools. Further, only PO's expert has considered the impact of vibrations during operation—the sole forces Petitioner's expert identified that must be accommodated to prevent popping out of place during operation. For Grounds 5-6, neither Herman nor Mathues teaches latch mechanisms that secure against the operational forces required by Konishi or McLaughlin. Accordingly, neither teaches a latch that could serve to secure the subject conveyor units.

A. Grounds 1-4 Fail: McLaughlin and Konishi Would Require Physical Securing Mechanisms

Petitioner's expert confirmed Grounds 1-4 turn on the theory that a POSITA would interpret Konishi and McLaughlin to teach removable conveyor units secured for operation by weight and friction alone. Ex. 1040, ¶47, ¶62, ¶100, ¶132. Further, he confirmed that none of Grounds 1-4 proposes adding a specific physical securing mechanism to either Konishi's or McLaughlin's conveyor unit. Ex. 2016, 8:15-10:3,

10:8-21:2, 23:15-26:7, 21:9-23:14, 26:12-28:23 (confirming Grounds 1-3 do not rely on any added physical securing mechanisms).

The record does not support this theory for any of Grounds 1-4.

B. Dr. Collins's Analysis is Fatally Flawed

As an initial matter, Dr. Collins did not—in either declaration—analyze the only concrete example of how conveyor units like Konishi and McLaughlin are actually implemented. As discussed in the POR and Sur-Reply, Petitioner's own commercial embodiments secure the McLaughlin conveyor unit with a locking nut tightened using a tool. *POR*, 41-44; *Sur-Reply*, 2-3, 7-9. Although these products are Petitioner's own, it has not advanced any evidence showing—or even suggesting—that McLaughlin's conveyor unit has *ever* been operated without physical securing.

Dr. Collins's opinions are primarily supported by free body diagrams in his supplemental declaration. There, he claims to have analyzed the pertinent forces at play and concludes that no physical securing mechanisms are required because “[t]here is no weight under which the conveyor [of Konishi and McLaughlin] would be lifted” during operation. Ex. 1040, ¶39, ¶42. This analysis fails to account for operational dynamic and vibrational forces, applies an improper coefficient of friction, and relies on impossible reactionary forces. Ex. 2015 *Dec.*, 16.

1. Operational Forces are Not Accounted For

Fatal to his opinions, the free body diagrams advanced by Dr. Collins do not account for all the dynamic forces the conveyors would experience in use. *Dec.*, ¶¶5-16. Even if his (1) weight assumptions, (2) dimension assumptions, and (3) calculations are accepted as true, he has failed to account for the vibrational and dynamic forces these conveyors would experience during use. *Dec.*, ¶¶5-16. Dr. Collins appears to understand the importance of considering vibrations when assessing whether conveyors like McLaughlin and Konishi are at risk of moving out of place during operation absent securing. Ex. 2014, 32:10-17; *Dec.*, ¶6. Dr. Collins additionally understands that increasing the weight of the conveyor unit does not necessarily prevent the conveyor of Konishi or McLaughlin from becoming out of place as the result of vibrations. Ex. 2014 34:11-15; *Dec.*, ¶6. In his supplemental analysis, however, Dr. Collins contradicts his own prior testimony, failing to consider vibrational forces and inaccurately asserting that the weight of the conveyor unit and friction alone would hold the conveyor units in place during use. *Dec.*, ¶6.

Leaving the conveyor units of Konishi and McLaughlin physically unsecured would also create significant issues with their weighing functions. As discussed by the Del Rosso reference relied upon by Petitioner, vertically stacked weigh conveyors (like Konishi and McLaughlin) are particularly susceptible to dynamic forces that can interfere with their readings. Ex. 1025, 1:31-53; *Dec.*, ¶7. In the case of Konishi and

McLaughlin, any movement between the pin and the frame in the vertical direction caused by vibration **will cause** the load cell to produce an artificially high reading. *Dec.*, ¶10. Accordingly, a POSITA would understand the conveyor units of Konishi and McLaughlin **must be** secured to avoid such movement. *Dec.*, ¶¶6-11.

The failure to consider dynamic and vibrational forces is fatal to Dr. Collins's findings. As Dr. Collins himself recognized, vibrations are a concern for a POSITA in conveyor design and can cause displacement in any direction. Ex. 2014, 32:10-17; Ex. 2016, 55:3-16. A POSITA would have understood this and would have ensured the conveyor units are physically secured to account for these forces. *Dec.*, ¶11.

2. Friction Forces Would Not be Relied on By a POSITA

Dr. Collin's ultimate conclusion/opinion is that friction forces would serve to hold Konishi's and McLaughlin's units in place during operation. As Dr. Reinholtz explains, a POSITA would **never** rely on friction to secure a running conveyor, particularly given the specific mechanical designs and friction forces at issue here. *Dec.*, ¶12. Friction forces are notoriously variable and unreliable, and any prudent designer would not trust friction or any other unreliable force to hold a critical component such as the conveyor in place. *Id.* The variability and unreliability of friction forces in systems like these is why Dr. Reinholtz did not rely on friction in his original force analysis. *Dec.*, ¶12 (noting no POSITA would be comfortable relying upon friction like these to determine if a machine would function properly).

3. *Dr. Collins Fails to Apply a Proper Coefficient of Friction*

Even if friction forces were appropriate for a POSITA to rely on—they are not—Dr. Collins fails to provide a coefficient of friction supported by any evidence. *Dec.*, ¶13. For instance, the coefficient of friction used by Dr. Collins—0.25—is not found in the exhibit he cites. Ex. 1067, 7; *Dec.*, ¶13. A POSITA would further understand the importance of choosing a coefficient as low as the worst-case scenario possible under the operating conditions. *Dec.*, ¶13. For example, in a food processing environment, there is a likelihood of contamination by meat products, particularly lard. *Dec.*, ¶13. Using Ex. 1067 cited by Dr. Collins, a POSITA would conservatively use, at the highest, the coefficient of static friction for steel on steel lubricated by lard is 0.11—less than half of the allegedly “conservative” estimate relied upon by Dr. Collins. *Dec.*, ¶13. Further, a POSITA would understand that vibrations can change the friction from static to kinetic friction, introducing an even smaller coefficient of friction (0.084 in the case of lard). *Dec.*, ¶13. The failure to properly apply a truly conservative coefficient of friction renders Dr. Collins’s analysis unreliable.

4. *Dr. Collins Does Not Apply Plausible Reactionary Forces for Konishi*

Dr. Collins also mischaracterizes the reactionary forces experienced by the pins supporting Konishi’s conveyor unit. Incorrectly, Dr. Collins assumes that all the horizontal reaction force caused by belt tension ($T_1 + T_2$) is experienced by pin 23F (i.e., Konishi’s non- drive side pin and hook). *See* Ex. 1040, ¶36. In fact, a POSITA

would understand that the drive-side pin 23R would assume at least a portion of the reaction force. Therefore, the non-drive side pins (23F) resting against the walls of 25F) will share a portion of the horizontal reaction force, rather than the full force as Dr. Collins assumes. *Dec.*, ¶14. Simply assuming, as Dr. Collins does, that 100% of the reaction force will be assumed by only one side is not reasonable. *Dec.*, 14-15.

V. THE NEW COMBINATIONS ALSO FAIL—NEITHER HERMAN NOR MATHUES TEACH LATCHES THAT SECURE AGAINST THE FORCES AT ISSUE

A. General Issues with Implementing Latches on Konishi and McLaughlin

There are two primary issues with implementing any generic latch on the conveyor units of Konishi and McLaughlin. Repeated vibrations tend to slip a latch out of place, mandating the use of mechanical securing mechanisms that resist vibrations. Indeed, Dr. Collins testified to this very point, confirming that a hook/latch could vibrate out of place if used to secure the conveyor of Konishi or McLaughlin. Ex. 2016, 56:12-24; *Dec.*, ¶17. Additionally, many latches, including the barrel latch described in Lee, must have a clearance between the pin and the bottom of the latch to allow an operator to put the latch into place. *Dec.*, ¶17. Without clearance, an operator would not be able to move the latch into place. However, this clearance allows the pin to oscillate vertically within the slot, causing problems with weighing, as discussed in Section IV.B.1 above. *Dec.*, ¶17.

There is a key characteristic that any physical mechanism must exhibit to properly secure the conveyor belt units of Konishi and McLaughlin. It must resist movement in the direction these conveyor belts would move when the non-drive pin is unseated and pops out of place. *Dec.*, ¶18. Since the pins of both Konishi and McLaughlin risk moving in the Y direction, any effective latching mechanism must resist Y direction (and some X direction) movement of the non-drive side pin to ensure the conveyor unit does not pop out of place during operation. Neither Herman's latch nor Mathues's latch exhibits this characteristic. *Dec.*, ¶18.

B. Herman's Latch Does Not Secure Against X-Y Operational Forces

The Petitioner argues that the amended claims are obvious over McLaughlin in light of Herman. Here, the Petitioner claims that the conveyor unit of McLaughlin can be secured by the latch of Herman. Ex. 1040, ¶155. Critically, neither Petitioner nor its expert considers that Herman's latch does not resist movement in the directions required for the combination. Indeed, the latch of Herman only restricts movement in the Z direction, while the conveyor of McLaughlin must be secured at least in the Y direction. *Dec.*, ¶¶19-24.

That Petitioner and Dr. Collins failed to acknowledge or address this fundamental inconsistency is fatal to the theory of obviousness advanced in Ground 5. For several reasons, no POSITA would have viewed Herman's latch as an effective solution for securing McLaughlin's conveyor, not least because Herman's latch is

designed to prevent movement in fundamentally different directions—resisting movement in the Z direction where the motion of the latch itself is exclusively in the X-Y plane. *Dec.*, ¶23.

Dr. Collins suggests that a POSITA would have added a spring to bias the latch in a closed direction as taught by Sugira. Ex. 1040, ¶155. As an initial matter, this appears to implicitly concede that Herman's latch would not in fact be effective to secure McLaughlin's conveyor unit during operation. Dr. Collins fails to describe this addition in any detail *Dec.*, ¶24. This leaves the questions of (1) how much spring force is necessary and (2) is a tool required to overcome the force of the spring when rotating the latch to remove the conveyor. Since at least two pins would need to be retained in McLaughlin, this also raises a practical question of whether multiple operators would be required to remove the conveyor assembly from its mounts. *Dec.*, ¶24. These unanswered questions render Dr. Collins' proposed combination unsuitable for its intended purpose. *Dec.*, ¶24.

C. Mathues's Latch Does Not Secure Against Operational Forces Required to Secure Konishi's Conveyor Unit

Even less applicable than Herman's latch, the latch described in Mathues does not resist movement in any direction. The entire conveyor unit in Mathues is bolted in place, resisting movement in any direction and relieving Mathues's latches from any responsibility to resist movement. *Dec.*, ¶¶25-27.

As an initial matter, there's some ambiguity in the record regarding what combination of Konishi and Mathues is actually proposed. In his declaration, Dr. Collins points to the zoomed in and annotated Fig. 12 from Mathues to suggest Mathues teaches pins, hooks, and grooves to prevent unintentional removal without tools. Ex. 1040, ¶219; *Dec.*, ¶26. However, in his deposition, he clarified that Mathues's hook(s) (annotated yellow) would be used to secure Konishi's non-drive side pin(s) vertically oriented groove(s). Ex. 2016, 44:7-45:11.

Dr. Collins appears to have misunderstood the mechanics of Mathues. He assumes the only securing structure holding the conveyor of Mathues in place on the arms of the machine are hooks 160 and 162. *See* Ex. 1040, ¶219; *Dec.*, ¶27. A POSITA would not interpret Mathues to place this responsibility on hooks 160 and 162. Instead, as shown in Fig. 13, Mathues's removable conveyor is bolted in place for operation. *Dec.*, ¶27. This directly contradicts Dr. Collins's opinion that Mathues's hooks 160 and 162 serve as the exclusive mechanism preventing unintentional removal during operation. Although Mathues does not explain in any detail *how* hooks 160 and 162 work in conjunction with the nut and bolt assemblies, a POSITA would recognize that hooks 160 and 162 serve to ensure the conveyor unit is fully positioned in the horizontal slots before the nut and bolt assembly/assemblies are tightened. *Dec.*, ¶27. In sum, contrary to Dr. Collins's analysis, Mathues does not teach hooks that retain a removable conveyor unit in place during operation. Further, even if Mathues were used

without the depicted bolts secured, hooks 160 and 162 do not resist any Y direction movement. *Dec.*, ¶27 (noting Y direction movement is prevented by the grooves). Accordingly, Mathues does not evidence hooks or latches that secure a conveyer belt from the types of forces required to secure Konishi.

Dr. Collins suggests that a POSITA would have added a spring to bias the latch in a closed direction as taught by Sugira. Ex. 1040, ¶231. As an initial matter, this appears to implicitly concede that Mathues's latch would not in fact be effective to secure Konishi's conveyor unit during operation. Dr. Collins fails to describe this addition in any detail. *Dec.*, ¶28. This lack of detail leaves the questions of (1) how much spring force is necessary and (2) is a tool required to overcome the force of the spring when rotating the latch to remove the conveyor. Since at least two pins would need to be retained in McLaughlin, this also raises a practical question of whether multiple operators would be required to remove the conveyor assembly from its mounts. *Dec.*, ¶28. These unanswered questions render Dr. Collins' proposed combination unsuitable for its intended purpose. *Dec.*, ¶28.

VI. CONCLUSION

For these reasons and reasons articulated in PO's Motion to Amend, PO respectfully requests that the Board grant the Patent Owner's Motion to Amend.

Patent Owner's Reply In Support Of The Motion To Amend
U.S. Patent No. 9,457,487

Respectfully submitted,

/Adam P. Seitz/

Adam P. Seitz, Reg. No. 52,206

Adam M. Sandwell, Reg. No. 72,484

adam.sandwell@eriseip.com

Megan J. Redmond, *pro hac vice* to be filed

megan.redmond@eriseip.com

Hunter A. Horton, *pro hac vice*

hunter.horton@eriseip.com

Carrie Bader, *pro hac vice* to be filed

carrie.bader@eriseip.com

ERISE IP, P.A.

7015 College Boulevard, Suite 700

Overland Park, Kansas 66211

Telephone: (913) 777-5600

Facsimile: (913) 777-5601

adam.seitz@eriseip.com

PTAB@eriseip.com

Paul R. Hart, Reg. No. 59,646

paul.hart@eriseip.com

Nathan S. Byers, Reg. No. 81,095

nathan.byers@eriseip.com

Christina Canino, *pro hac vice*

christina.canino@eriseip.com

ERISE IP, P.A.

717 17th Street, Suite 1400

Denver Colorado 80202

Telephone: (913) 777-5600

Facsimile: (913) 777-5601

ATTORNEYS FOR PATENT OWNER

APPENDIX OF EXHIBITS

Exhibit 2015	Supplemental Declaration of Dr. Charles Reinholtz (" <i>Dec.</i> ")
Exhibit 2016	Second Deposition Transcript of Dr. John Collins

CERTIFICATION OF PAGE COUNT

The undersigned certifies pursuant to 37 C.F.R. § 42.24 that the foregoing Reply
In Support of Patent Owner's Motion to Amend is less than 12 pages.

Dated: November 1, 2024

Respectfully submitted,

/Adam P. Seitz/

Adam P. Seitz, Reg. No. 52,206
ERISE IP, P.A.

7015 College Boulevard, Suite 700
Overland Park, Kansas 66211

Telephone: (913) 777-5600

Facsimile: (913) 777-5601

adam.seitz@eriseip.com

PTAB@eriseip.com

ATTORNEYS FOR PATENT OWNER

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Reply In Support of Patent Owner's Motion to Amend was served on November 1, 2024, by email on the following counsel of record for Petitioner:

Michael G. Babbit	mbabbit@willkie.com
Sara T. Horton	shorton@willkie.com
Ren-how H. Harn	rharn@willkie.com
Mitchell M. Feldhake	mfeldhake@willkie.com

WILLKIE FARR & GALLAGHER LLP
ProvisurPTAB@willkie.com

Dated: November 1, 2024

Respectfully submitted,

/Adam P. Seitz/

Adam P. Seitz, Reg. No. 52,206
adam.seitz@eriseip.com

ATTORNEYS FOR PATENT OWNER

APPENDIX A: CLAIM LISTING WITH CHANGES SHOWN

1.-4. (Cancelled)

5. (Original) The apparatus in accordance with claim 1, wherein at least one direct drive (15) for the conveyor belt unit (13) is provided.

6. (Cancelled)

7. (Original) The apparatus in accordance with claim 1, further comprising:
wherein a drive motor (15) for the conveyor belt unit (13) has a drive shaft (51) and the conveyor belt unit (13) has a drive wheel (44), with the drive shaft (51) and the drive wheel (44) being directly coupled to one another; and

wherein the drive motor (15) is arranged beneath the conveyor belt unit (13).

8. (Original) The apparatus in accordance with claim 1, further comprising:
wherein the conveyor belt unit (13) has a supported belt roller (53), with a drive wheel (44) of the conveyor belt unit (13) being supported via the support of the belt roller; and

wherein the drive wheel (44) is arranged coaxially to the belt roller (53).

9.-10. (Cancelled)

11. (Original) The apparatus in accordance with claim 1, wherein a coupling between a drive (15) for the conveyor belt unit (13) and the conveyor belt unit (13) is configured to be cancelled or established simultaneously with a latching of the conveyor belt unit (13) for removing or installing the conveyor belt unit (13).

12. (Original) The apparatus in accordance with claim 1, wherein the coupling between a drive (15) for the conveyor belt unit (13) and the conveyor belt unit (13) is configured to be carried out simultaneously with a removal movement or installation movement of the conveyor belt unit (13) after the cancelling or before the establishing of a latched connection of the conveyor belt unit (13) for removing or for installing the conveyor belt unit (13).

13. (Original) The apparatus in accordance with claim 1, further comprising:

wherein the conveyor belt unit (13) comprises a plurality of individual conveyors (71, 73) which are arranged, viewed in the conveying direction, behind one another and with which a separate drive (15) is associated; and

wherein viewed in the conveying direction, at least one drive (15) is coupled to the conveyor belt unit (13) at the left side and at least one further drive (15) at the right side.

14.-15 46. (Cancelled)

16. (Original) The apparatus in accordance with claim 1, wherein the conveyor belt unit (13) is configured to be removed and/or installed without tools.

17. (Original) The apparatus in accordance with claim 1, further comprising:

wherein a plurality of conveyor belt units (13) are arranged behind one another

viewed in the conveying direction; and

wherein the plurality of conveyor belt units are arranged beside one another, viewed in the conveying direction.

18. (Original) A conveying device for food products to be sliced or for sliced food products, the conveying device comprising at least one removable conveyor belt unit (13), having at least one track and a base (25);

a substructure (41) having a mount (11) provided with coupling elements (37) that engage corresponding cut-outs (59) of the base (25); and

a drive (15) arranged at the substructure (41), the drive (15) connected to a drive shaft (51) that drives a drive wheel (44) of the conveyor belt unit (13) by a drive belt (27).

19. (Original) A slicing apparatus for food products, the slicing apparatus comprising at least one removable conveyor belt unit (13) having at least one track and a base (25);

a substructure (41) having a mount (11) coupled to the base (25);

a drive (15) coupled to the conveyor belt unit (13) by an actuation device, the actuation device having a lever (19), a shaft (29) extending from the lever (19), a latching member (21) extending from the shaft (29) that cooperates with a slit (23) formed in the base (25) to latch the conveyor belt unit (13) to the mount (11), and a linkage (35) carrying the drive (15) for the conveyor belt unit (13) being pivotable

about a pivot axis (33) by rotating the shaft (29) to move the latching member (21) between a latched position and a release position; and

a drive belt (27) that runs around a driveshaft (51) of the drive (15) and a drive wheel (44) of the conveyor belt unit (13), the conveyor belt unit (13) is configured to be cancelled by relaxing the drive belt (27) and is configured to be established by tautening the drive belt (27), with the relaxing and tautening of the drive belt (27) each being provided by a relative movement between the drive (15) and the conveyor belt unit (13).

20. (Original) A slicing apparatus for food products, the slicing apparatus comprising at least one removable conveyor belt unit (13) having at least one track and a base (25);

a substructure (41) having a mount (11) coupled to the base (25); and

an actuation device that is provided as a coupling that is configured to be cancelled and established between a drive (15) for the conveyor belt unit (13) and the conveyor belt unit (13), and is configured as a latching of the conveyor belt unit (13) to the mount (11), the actuation device comprises

a lever (19) having a shaft (29);

a linkage (35) carrying a drive (15) for the conveyor belt unit (13) being pivotable about a pivot axis (33) by rotating the shaft; and

a latching member (21) for the conveyor belt unit (13) being movable

between a latched position (21) and a release position.

21. (Original) A slicing apparatus for food products, the slicing apparatus comprising:

at least one removable conveyor belt unit (13) having at least one track and a base (25); and

a substructure (41) having a mount (11) coupled to the base (25), the conveyor belt unit (13) is movable relative to the drive (15) for cancelling and establishing a coupling between a drive (15) of the conveyor belt unit (13) and the conveyor belt unit (13), and the conveyor belt unit (13) is movable by at least one of folding over and pivoting.

22. (~~Contingently Cancelled~~) ~~A slicing apparatus for food products, the slicing apparatus comprising:~~

~~at least one removable conveyor belt unit (13) having at least one track and a base (25);~~

~~a substructure (41) having a mount (11) coupled to the base (25); and~~

~~a first drive (15) is coupled to the conveyor belt unit (13) at the left side and at a second drive (15) at the right side, when viewed in the conveying direction, the coupling between the drives (15) and the conveyor belt unit (13) is configured to be simultaneously cancelled and established for at least one of the first drive (15) and the second drive (15).~~

23. (Original) A slicing apparatus for food products, the slicing apparatus comprising:

at least one removable conveyor belt unit (13) having at least one track and a base (25); and

a substructure (41) having a mount (11) coupled to the base (25), the conveyor belt unit (13) is configured to first be movable with a component in or against the conveying direction relative to the mount (11) and is configured to subsequently be raised from the mount (11) for at least one of removing and installing the conveyor belt unit (13) with a cancelled latched connection between the conveyor belt unit (13) and a mount (11) remaining at the apparatus.

24. (Original) A slicing apparatus for food products, the slicing apparatus comprising:

at least one removable conveyor belt unit (13) having at least one track and a base (25); and

a substructure (41) having a mount (11) coupled to the base (25), the conveyor belt unit (13) is configured to first be pivoted about one of two supports (65, 67) of the mount (11), and is configured to subsequently be raised from the supports (65, 67) for at least one of removing and installing the conveyor belt unit (13) with a cancelled latched connection between the conveyor belt unit (13) and a mount (11) remaining at the apparatus.

~~25. (Substitute for Claim 1) — A slicing apparatus for food products, the slicing apparatus comprising:~~

~~a removable conveyor belt unit (13) having at least one track and a base (25);~~

~~a substructure (41) having a mount (11) coupled to the base (25); and~~

~~a drive (15) coupled to the conveyor belt unit (13) by a drive belt (27), the conveyor belt unit (13) is configured to be cancelled by relaxing the drive belt (27) and is configured to be established by tautening the drive belt (27), with the relaxing and tautening of the drive belt (27) each being provided by a relative movement between the drive (15) and the conveyor belt unit (13)[[.]];~~

~~wherein the conveyor belt unit (13) is configured to be removed and/or installed without tools.~~

[[26]] 25. (Substitute for Claim 2) The apparatus in accordance with claim [[25]] 16, wherein the conveyor belt unit (13) is arranged in front of a cutting plane of the slicing apparatus, viewed in the conveying direction.

[[27]] 26. (Substitute for Claim 3) The apparatus in accordance with claim [[25]] 16, wherein the conveyor belt unit (13) is arranged behind a cutting plane of the slicing apparatus, viewed in the conveying direction.

[[28]] 27. (Substitute for Claim 4) The apparatus in accordance with claim [[25]] 16, wherein the conveyor belt unit (13) has, viewed in the conveying direction, a belt length or conveyor length which amounts to less than 500 mm.

[[29]] 28. (Substitute for Claim 6) The apparatus in accordance with claim
[[25]] 16, further comprising:

wherein at least one drive motor (15) for the conveyor belt unit (13) is provided,
with the drive motor (15) being directly coupled with the conveyor belt unit (13),
and/or unit; and

wherein the drive motor (15) is arranged beneath the conveyor belt unit (13).

[[30]] 29. (Substitute for Claim 9) The apparatus in accordance with claim
[[25]] 16, further comprising:

wherein a respective relative movement is provided between the drive motor
(15) and the conveyor belt unit (13) for cancelling and establishing a coupling between
a drive motor (15) for the conveyor belt unit (13) and the conveyor belt unit; and

wherein the spacing between a drive axle of the drive motor (15) and a drive
axle of the conveyor belt unit (13) is configured to be varied by the relative movement.

[[31]] 30. (Substitute for Claim 10) The apparatus in accordance with claim
[[25]] 16, wherein a mount (11) is provided for the conveyor belt unit (13) which
remains at the apparatus with a removed conveyor belt unit (13) and at which the
conveyor belt unit (13) is configured to be latched, with the latched connection
configured to be cancelled for removing the conveyor belt unit (13) and configured to
be established for installing the conveyor belt unit (13).

[[32]] 31. (Substitute for Claim 14) The apparatus in accordance with claim

[[25]] 16, wherein the conveyor belt unit (13) has a conveying width in the range from approximately 300 mm to 700 mm.

[[33]] 32. (Substitute for Claim 15) The apparatus in accordance with claim [[25]] 16, wherein at least one continuous belt or continuous band (55) or a plurality of parallel continuous straps (57) is/are provided as conveying means of the conveyor belt unit (13).

[[34]] 33. (~~Contingent~~ Substitute for Claim 22) A slicing apparatus for food products, the slicing apparatus comprising:

at least one removable conveyor belt unit (13) having at least one track and a base (25);

a substructure (41) having a mount (11) coupled to the base (25); and

a first drive (15) is coupled to the conveyor belt unit (13) at the left side and at a second drive (15) at the right side, when viewed in the conveying direction, the coupling between the drives (15) and the conveyor belt unit (13) is configured to be simultaneously cancelled and established for at least one of the first drive (15) and the second drive (15);

wherein the conveyor belt unit (13) is configured to be removed and/or installed without tools.

APPENDIX B: CLEAN CLAIM LISTING

1.-4. (Cancelled)

5. (Original) The apparatus in accordance with claim 1, wherein at least one direct drive (15) for the conveyor belt unit (13) is provided.

6. (Cancelled)

7. (Original) The apparatus in accordance with claim 1, further comprising:
wherein a drive motor (15) for the conveyor belt unit (13) has a drive shaft (51) and the conveyor belt unit (13) has a drive wheel (44), with the drive shaft (51) and the drive wheel (44) being directly coupled to one another; and

wherein the drive motor (15) is arranged beneath the conveyor belt unit (13).

8. (Original) The apparatus in accordance with claim 1, further comprising:
wherein the conveyor belt unit (13) has a supported belt roller (53), with a drive wheel (44) of the conveyor belt unit (13) being supported via the support of the belt roller; and

wherein the drive wheel (44) is arranged coaxially to the belt roller (53).

9.-10. (Cancelled)

11. (Original) The apparatus in accordance with claim 1, wherein a coupling between a drive (15) for the conveyor belt unit (13) and the conveyor belt unit (13) is configured to be cancelled or established simultaneously with a latching of the conveyor belt unit (13) for removing or installing the conveyor belt

unit (13).

12. (Original) The apparatus in accordance with claim 1, wherein the coupling between a drive (15) for the conveyor belt unit (13) and the conveyor belt unit (13) is configured to be carried out simultaneously with a removal movement or installation movement of the conveyor belt unit (13) after the cancelling or before the establishing of a latched connection of the conveyor belt unit (13) for removing or for installing the conveyor belt unit (13).

13. (Original) The apparatus in accordance with claim 1, further comprising:

wherein the conveyor belt unit (13) comprises a plurality of individual conveyors (71, 73) which are arranged, viewed in the conveying direction, behind one another and with which a separate drive (15) is associated; and

wherein viewed in the conveying direction, at least one drive (15) is coupled to the conveyor belt unit (13) at the left side and at least one further drive (15) at the right side.

14.-15. (Cancelled)

16. (Original) The apparatus in accordance with claim 1, wherein the conveyor belt unit (13) is configured to be removed and/or installed without tools.

17. (Original) The apparatus in accordance with claim 1, further comprising:

wherein a plurality of conveyor belt units (13) are arranged behind one another viewed in the conveying direction; and

wherein the plurality of conveyor belt units are arranged beside one another, viewed in the conveying direction.

18. (Original) A conveying device for food products to be sliced or for sliced food products, the conveying device comprising at least one removable conveyor belt unit (13), having at least one track and a base (25);

a substructure (41) having a mount (11) provided with coupling elements (37) that engage corresponding cut-outs (59) of the base (25); and

a drive (15) arranged at the substructure (41), the drive (15) connected to a drive shaft (51) that drives a drive wheel (44) of the conveyor belt unit (13) by a drive belt (27).

19. (Original) A slicing apparatus for food products, the slicing apparatus comprising at least one removable conveyor belt unit (13) having at least one track and a base (25);

a substructure (41) having a mount (11) coupled to the base (25);

a drive (15) coupled to the conveyor belt unit (13) by an actuation device, the actuation device having a lever (19), a shaft (29) extending from the lever (19), a latching member (21) extending from the shaft (29) that cooperates with a slit (23) formed in the base (25) to latch the conveyor belt unit (13) to the mount (11), and a

linkage (35) carrying the drive (15) for the conveyor belt unit (13) being pivotable about a pivot axis (33) by rotating the shaft (29) to move the latching member (21) between a latched position and a release position; and

a drive belt (27) that runs around a driveshaft (51) of the drive (15) and a drive wheel (44) of the conveyor belt unit (13), the conveyor belt unit (13) is configured to be cancelled by relaxing the drive belt (27) and is configured to be established by tautening the drive belt (27), with the relaxing and tautening of the drive belt (27) each being provided by a relative movement between the drive (15) and the conveyor belt unit (13).

20. (Original) A slicing apparatus for food products, the slicing apparatus comprising at least one removable conveyor belt unit (13) having at least one track and a base (25);

a substructure (41) having a mount (11) coupled to the base (25); and

an actuation device that is provided as a coupling that is configured to be cancelled and established between a drive (15) for the conveyor belt unit (13) and the conveyor belt unit (13), and is configured as a latching of the conveyor belt unit (13) to the mount (11), the actuation device comprises

a lever (19) having a shaft (29);

a linkage (35) carrying a drive (15) for the conveyor belt unit (13)

being pivotable about a pivot axis (33) by rotating the shaft; and

a latching member (21) for the conveyor belt unit (13) being movable between a latched position (21) and a release position.

21. (Original) A slicing apparatus for food products, the slicing apparatus comprising:

at least one removable conveyor belt unit (13) having at least one track and a base (25); and

a substructure (41) having a mount (11) coupled to the base (25), the conveyor belt unit (13) is movable relative to the drive (15) for cancelling and establishing a coupling between a drive (15) of the conveyor belt unit (13) and the conveyor belt unit (13), and the conveyor belt unit (13) is movable by at least one of folding over and pivoting.

22. (Cancelled)

23. (Original) A slicing apparatus for food products, the slicing apparatus comprising:

at least one removable conveyor belt unit (13) having at least one track and a base (25); and

a substructure (41) having a mount (11) coupled to the base (25), the conveyor belt unit (13) is configured to first be movable with a component in or against the conveying direction relative to the mount (11) and is configured to subsequently be raised from the mount (11) for at least one of removing and

installing the conveyor belt unit (13) with a cancelled latched connection between the conveyor belt unit (13) and a mount (11) remaining at the apparatus.

24. (Original) A slicing apparatus for food products, the slicing apparatus comprising:

at least one removable conveyor belt unit (13) having at least one track and a base (25); and

a substructure (41) having a mount (11) coupled to the base (25), the conveyor belt unit (13) is configured to first be pivoted about one of two supports (65, 67) of the mount (11), and is configured to subsequently be raised from the supports (65, 67) for at least one of removing and installing the conveyor belt unit (13) with a cancelled latched connection between the conveyor belt unit (13) and a mount (11) remaining at the apparatus.

25. (Substitute for Claim 2) The apparatus in accordance with claim 16, wherein the conveyor belt unit (13) is arranged in front of a cutting plane of the slicing apparatus, viewed in the conveying direction.

26. (Substitute for Claim 3) The apparatus in accordance with claim 16, wherein the conveyor belt unit (13) is arranged behind a cutting plane of the slicing apparatus, viewed in the conveying direction.

27. (Substitute for Claim 4) The apparatus in accordance with claim 16, wherein the conveyor belt unit (13) has, viewed in the conveying direction, a belt

length or conveyor length which amounts to less than 500 mm.

28. (Substitute for Claim 6) The apparatus in accordance with claim 16, further comprising:

wherein at least one drive motor (15) for the conveyor belt unit (13) is provided, with the drive motor (15) being directly coupled with the conveyor belt unit (13), and/or unit; and

wherein the drive motor (15) is arranged beneath the conveyor belt unit (13).

29. (Substitute for Claim 9) The apparatus in accordance with claim 16, further comprising:

wherein a respective relative movement is provided between the drive motor (15) and the conveyor belt unit (13) for cancelling and establishing a coupling between a drive motor (15) for the conveyor belt unit (13) and the conveyor belt unit; and

wherein the spacing between a drive axle of the drive motor (15) and a drive axle of the conveyor belt unit (13) is configured to be varied by the relative movement.

30. (Substitute for Claim 10) The apparatus in accordance with claim 16, wherein a mount (11) is provided for the conveyor belt unit (13) which remains at the apparatus with a removed conveyor belt unit (13) and at which the conveyor belt unit (13) is configured to be latched, with the latched connection configured to be

cancelled for removing the conveyor belt unit (13) and configured to be established for installing the conveyor belt unit (13).

31. (Substitute for Claim 14) The apparatus in accordance with claim 16, wherein the conveyor belt unit (13) has a conveying width in the range from approximately 300 mm to 700 mm.

32. (Substitute for Claim 15) The apparatus in accordance with claim 16, wherein at least one continuous belt or continuous band (55) or a plurality of parallel continuous straps (57) is/are provided as conveying means of the conveyor belt unit (13).

33. (Substitute for Claim 22) A slicing apparatus for food products, the slicing apparatus comprising:

at least one removable conveyor belt unit (13) having at least one track and a base (25);

a substructure (41) having a mount (11) coupled to the base (25); and

a first drive (15) is coupled to the conveyor belt unit (13) at the left side and at a second drive (15) at the right side, when viewed in the conveying direction, the coupling between the drives (15) and the conveyor belt unit (13) is configured to be simultaneously cancelled and established for at least one of the first drive (15) and the second drive (15);

wherein the conveyor belt unit (13) is configured to be removed and/or

installed without tools.