

Inter Partes Review U.S. Patent No. 9,457,487

Oral Argument, January 15, 2025

Provisur Technologies, Inc. v. Textor Maschinenbau GmbH
Case No. IPR2024-00224

Patent Owner's Demonstrative Exhibits – Not Evidence

Patent Owner's PX-I

IPR2024-00224
Textor EX2028 Page 1

U.S. Patent No. 9,457,487

- ▶ Removable conveyor belt unit
 - ▶ Belt between conveyor unit and drive relaxed/taughtened via relative movement between conveyor unit and drive.
- ▶ Motion to Amend:
 - ▶ All Challenged Claims limited to “toolless” removal/installation.

(12) United States Patent Mayer		(10) Patent No.: US 9,457,487 B2
		(45) Date of Patent: Oct. 4, 2016
(54) HIGH PERFORMANCE SLICING APPARATUS WITH AT LEAST ONE REMOVABLE CONVEYOR BELT UNIT		(56) References Cited
		U.S. PATENT DOCUMENTS
(71) Applicant: Textor Maschinenbau GmbH, Wolfertschwenden (DE)	3,878,937 A * 4/1975 Glaser et al. 198/835	
	5,871,085 A * 2/1999 Yagi 198/835	
	5,934,449 A * 8/1999 Dolan 198/853	
	5,964,340 A * 10/1999 Dolan 198/853	
(72) Inventor: Josef Mayer, Memmingerberg (DE)	5,967,296 A * 10/1999 Dolan 198/853	
	6,371,283 B1 * 4/2002 Manchester 177/126	
	6,509,533 B1 * 1/2003 Tanaka B65G 15/00	
(73) Assignee: TEXTOR MASCHINENBAU GMBH, Wolfertschwenden (DE)	6,959,803 B1 * 11/2005 Layne et al. 198/600	
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	7,909,159 B1 * 3/2011 Zats B65G 15/12	
(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 0 days.	2008/0073185 A1 3/2008 Brayman et al. 198/586	
		FOREIGN PATENT DOCUMENTS
(21) Appl. No.: 14/094,136	DE 102008024314 A1 11/2009	
	DE 102010001969 A1 8/2011	
(22) Filed: Dec. 2, 2013	EP 1584580 A1 10/2005	
	EP 1816092 A1 8/2007	
	EP 1877328 B1 11/2008	
(65) Prior Publication Data	EP 2239108 A2 10/2010	
US 2014/0174891 A1 Jun. 26, 2014	EP 2357063 A1 8/2011	
	GB 2041315 A 9/1980	
	WO 2006103348 A1 10/2006	
(30) Foreign Application Priority Data		OTHER PUBLICATIONS
Dec. 3, 2012 (DE)	10 2012 222 042	Search Report regarding related Application No. 10 2013 206 510.8; dated Nov. 8, 2013; 5 pgs.
Apr. 12, 2013 (DE)	10 2013 206 510	English Translation of German Search Report dated Nov. 8, 2013; DE Pat. App. No. 10 2013 206 510.8; 6 pgs.
(51) Int. Cl.		European Search Report for European Application No. 13195533.8 dated Dec. 10, 2014.
B65G 15/10 (2006.01)		
B26D 7/06 (2006.01)		* cited by examiner
B26D 7/32 (2006.01)		<i>Primary Examiner</i> — William R Harp
B65G 15/00 (2006.01)		(74) <i>Attorney, Agent, or Firm</i> — Cantor Colburn LLP
(52) U.S. Cl.		(57) ABSTRACT
CPC	B26D 7/0625 (2013.01); B26D 7/32 (2013.01); B26D 2210/02 (2013.01); B65G 15/00 (2013.01)	The invention relates to a slicing apparatus for food products, in particular to a high-performance slicer, having at least one belt conveyor which is configured as a removable conveyor belt unit.
(58) Field of Classification Search		24 Claims, 15 Drawing Sheets
CPC	B26D 7/0625 ; B26D 7/32 ; B65G 15/12	
USPC	198/817	
See application file for complete search history.		

U.S. Patent No. 9,457,487 – Toolless Limitation

- ▶ 16.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.

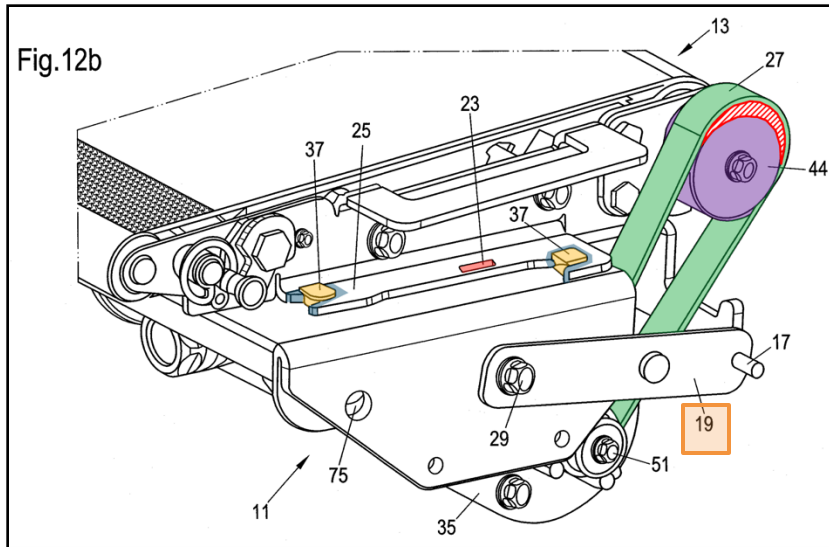
- ▶ POR, 5:

Multiple methods of toolless removal are described in the '487 Patent. In each method, a mechanism allows the user to remove the conveyor for cleaning from a fully secured state (i.e., the state in which the conveyor operates) without any tools.

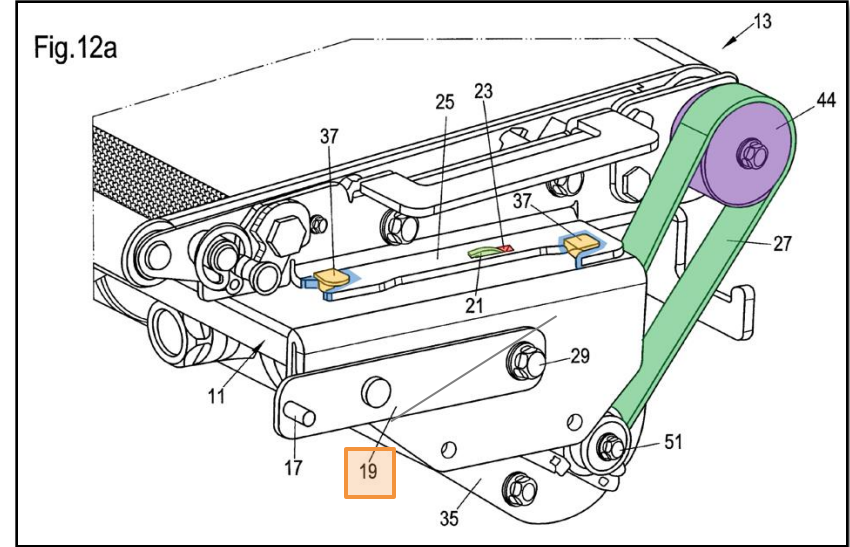
U.S. Patent No. 9,457,487

Ist Toolless Embodiment

- ▶ Lever 19 (orange) engages/tightens the drive belt and secures the conveyor belt via latch 21 (light green).



'487 Patent., Fig. 12(b) (annotated)



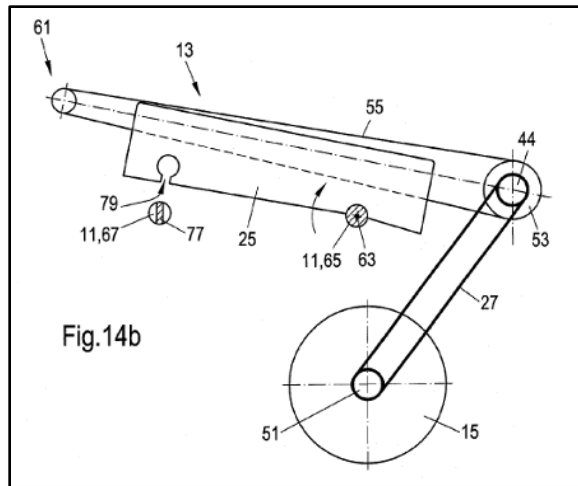
'487 Patent., Fig. 12(a) (annotated)

U.S. Patent No. 9,457,487

2nd Toolless Embodiment

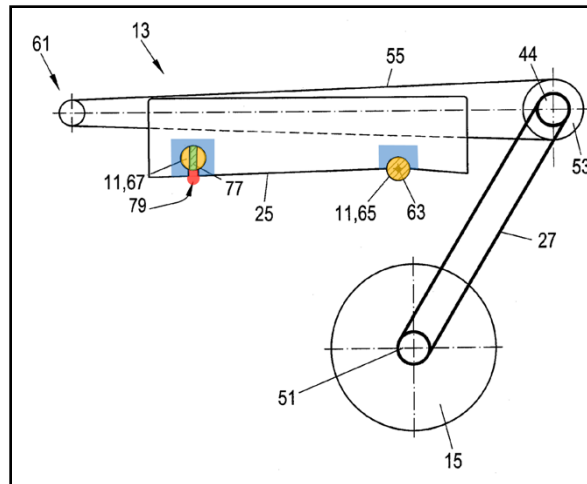
► Toolless pivot and latch-based securing

DISENGAGED



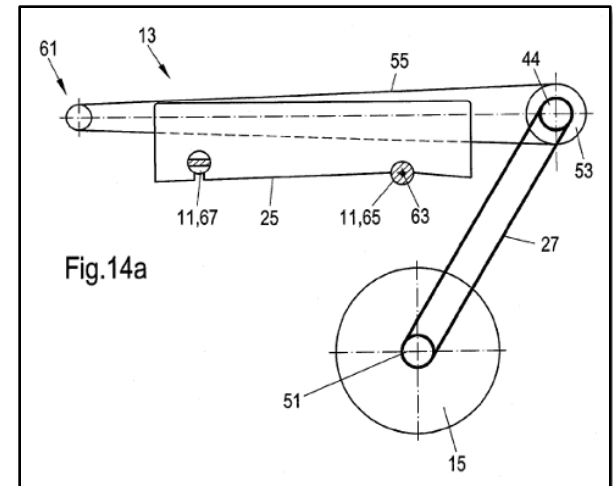
'487 Patent., Fig. 14(b)

TRANSITIONAL



'487 Patent., Fig. 14(a) (annotated)

FULLY SECURED



'487 Patent., Fig. 14(a)

Toolless Limitation: Meaning Undisputed

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

▶ POR, 25:

- ▶ Toolless Limitation requires “transition[ing], without tools, from a **secured and fully operational state** to an unsecured state where the conveyor can be removed from the substructure.”

▶ Reply ISO, 2:

- ▶ “[T]he 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.”

Toolless Limitation: Meaning Undisputed (cont.)

- ▶ Petitioner has never disputed this interpretation, and its theories turn on an allegedly secured conveyor.
- ▶ Ex. 1003, ¶230:

H. Dependent Claim 16

...

As I detailed, the shape and structure of McLaughlin's sidewalls 230 and support frame 225 show that those two components are designed to interconnect. A POSA would appreciate that the interconnecting fit between the two components could be designed to be tight enough to not require any additional tools to secure the conveyor belt unit to the substructure and hold it in place through gravity alone. ...

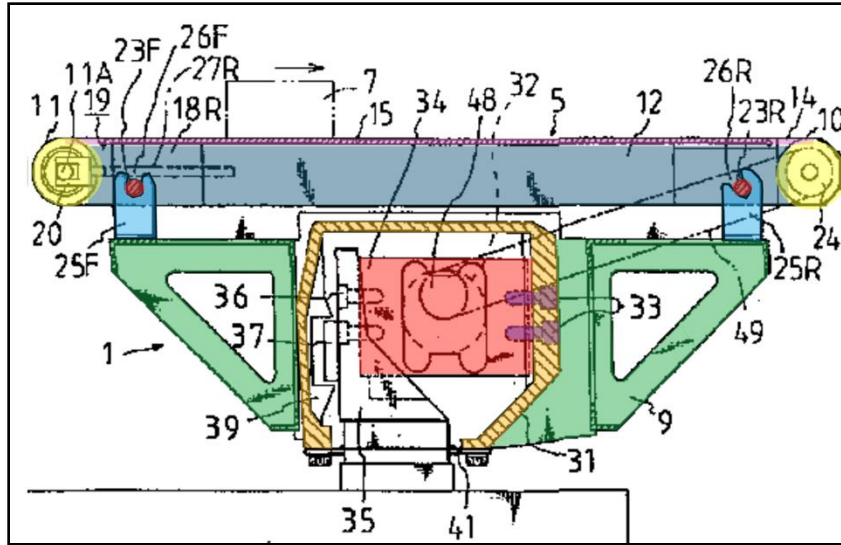
Thus, McLaughlin illustrates a support system capable of securing a conveyor belt unit in place and removing it without any tools.

- ▶ Ex. 1040, ¶47:

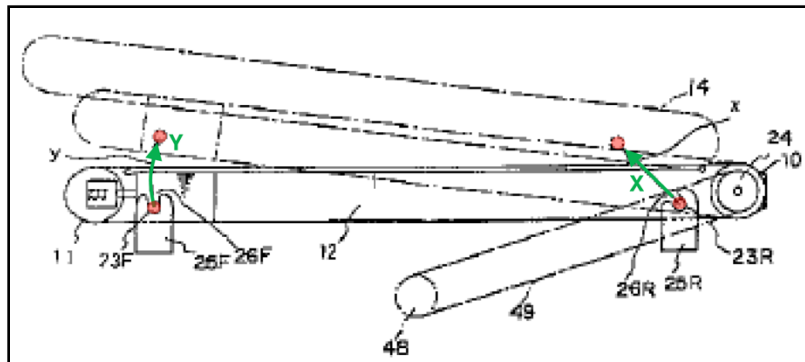
47. As shown in my first declaration, Konishi anticipates this claim limitation. Konishi clearly discloses a conveyor that can be installed and/or removed without requiring tools. This is illustrated in my first declaration with the image copied above. And, as I discuss above when rebutting Dr. Reinholtz's free-body force analysis, a POSA would have understood that the weight and frictional forces at play would have kept the removable conveyor belt unit in place.

Konishi (Ex. 1004)

Mapped “Conveyor Unit” in Grounds 1, 2, 6



Konishi, Fig. 1 (annotated)



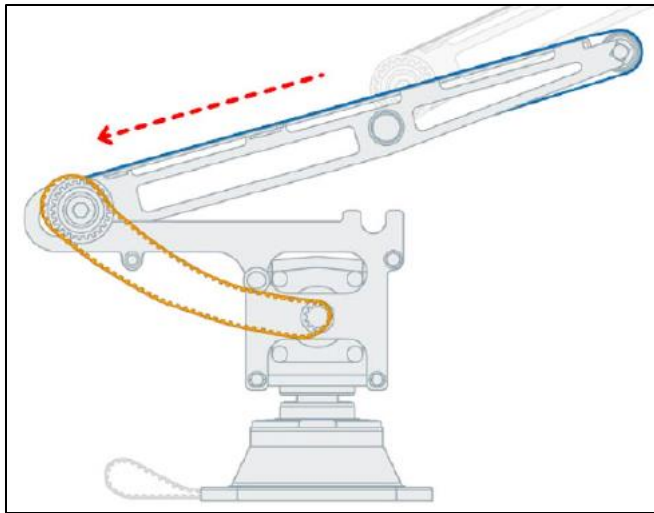
Konishi, Fig. 8 (annotated)

- ▶ Konishi discloses conveyor-based scale.
- ▶ No discussion of how conveyor unit is secured for operation.

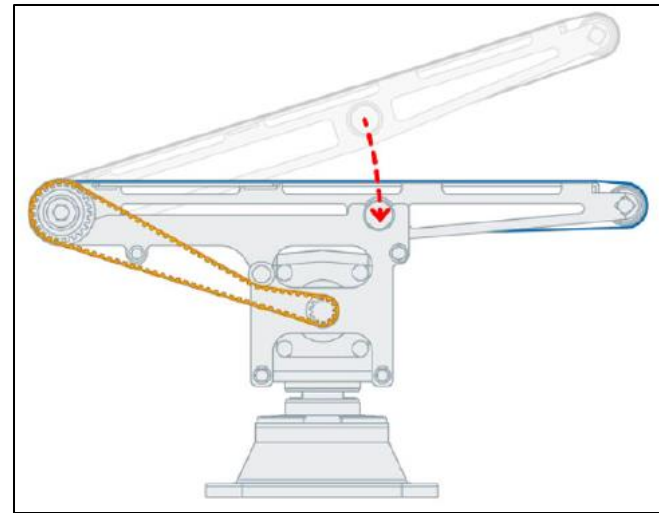
McLaughlin (Ex. 1006)

Mapped “Conveyor Unit” in Grounds 3-5

- ▶ *McLaughlin* discloses a conveyor-based scale.
 - ▶ No discussion of the conveyor unit being removable, but PO has not disputed Petitioner’s theory that *McLaughlin*’s conveyor unit is removable.
- ▶ No discussion of how the conveyor unit is secured for operation.



Petition, 58



Petition, 59

Petitioner's Invalidity Theories

- ▶ (1) Silence sufficient to satisfy toolless limitation
 - ▶ Grounds 1-4: POSITA would understand **gravity and friction** sufficiently secure units such that silence would be interpreted to mean that no securing mechanisms are required.

- ▶ (2) POSITA could pick from mechanisms generally known in the art
 - ▶ Grounds 2-4: POSITA could have secured *McLaughlin's* and *Konishi's* conveyor units using any one of a laundry list of securing mechanisms.

- ▶ (3) Ground 5: Obvious to modify *McLaughlin* with *Herman's* latch

- ▶ (4) Ground 6: Obvious to modify *Konishi* with *Mathues'* latch

Reality of Petitioner's Invalidity Theories

- ▶ Silence insufficient—*Konishi* and *McLaughlin* demand physical securing
 - ▶ The only concrete implementation evidence shows that prior art units like *McLaughlin* and *Konishi* are mechanically secured **with tools**.
 - ▶ Gravity theory *flawed*: Base references are **lightweight** conveyor scale units.
 - ▶ Friction theory *flawed*: Vibrations during operation make friction **unreliable**.
- ▶ No evidence of toolless mechanisms securing against forces like those experienced by *Konishi* and *McLaughlin*
- ▶ *Herman* and *Mathues* describe similar hook-shaped latches, but neither secure against forces experienced by *Konishi* or *McLaughlin*
 - ▶ *Herman's* conveyor is mounted on rods that prevent lifting during operation.
 - ▶ *Mathues'* conveyor unit is bolted—its hook secures nothing during operation.
 - ▶ Even Dr. Collins concedes that these latches alone are insufficient, proposing an additional biasing spring from a *different* reference.

Konishi's and McLaughlin's Silence is Insufficient

- ▶ Key Question: Would a POSITA interpret the reference's silence concerning securing mechanisms to mean (1) that no securing mechanisms are required or (2) that securing mechanisms are required implementation details not addressed by the patents?

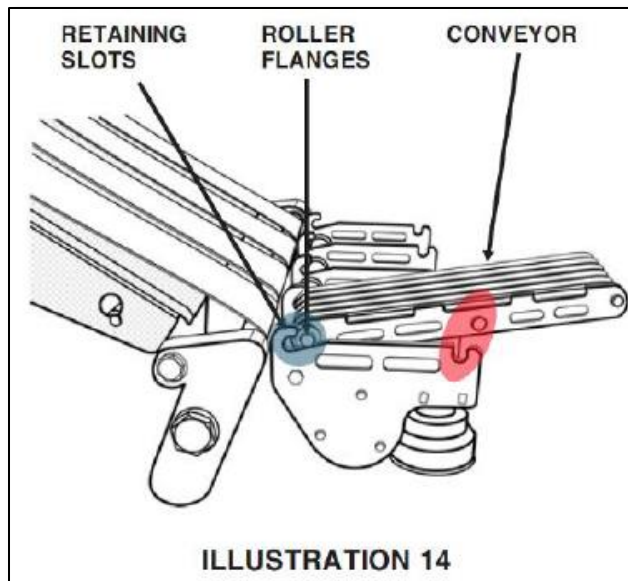
- ▶ (1) Petitioner: A POSITA would understand the units are adequately secured for operation by gravity and friction alone.

- ▶ (2) Patent Owner: No reasonable POSITA would consider relying on gravity and friction to secure the units.

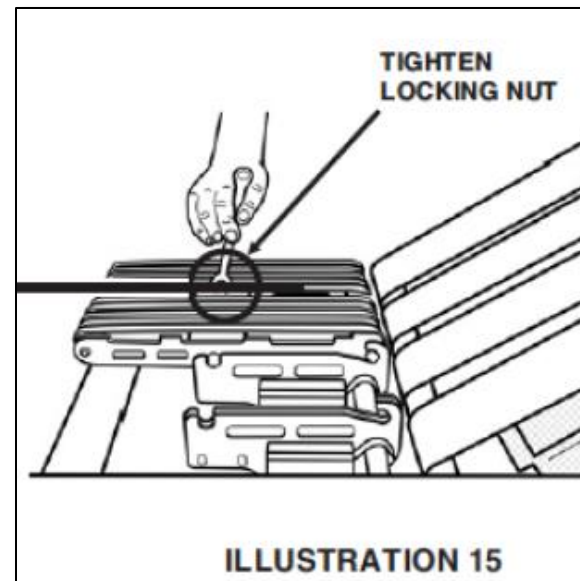
Silence is Insufficient

Objective Evidence Shows Securing is Mandatory

- ▶ *McLaughlin's* prior art commercial embodiments demonstrate securing is mandatory.



Ex. 1031, 54 (Illustration 14 (annotated))



Ex. 1031, 54 (Illustration 15)

- ▶ Only Patent Owner's expert has considered this objective evidence.

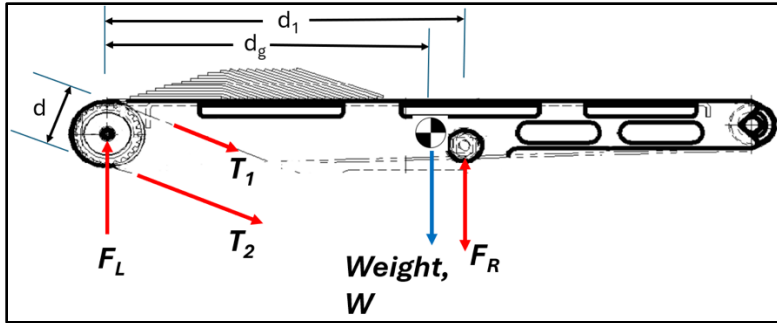
Petitioner's Non-Prior Art Commercial Embodiment Supports *Non-Obviousness*

Further, McLaughlin contemplates toolless conveyor removal according to Textor's own interpretation of products marked with that reference. Textor argued to the district court that Provisur's SX380—a product marked with McLaughlin (EX1019, 9)—met the claims of the '487 patent. (*Provisur Technologies, Inc. v. Weber, Inc. et al.*, Case No 5-21-cv-06113 (WDMO), Doc. #518 (filed 09/18/2024), p. 16.) Textor moved for summary judgment on this argument, and the court granted that motion. (*Id.*, p. 17.) It is inconsistent for Textor to argue that products covered by McLaughlin literally meet the '487 claims in the district court while arguing that McLaughlin does not render obvious the '487 claims here.

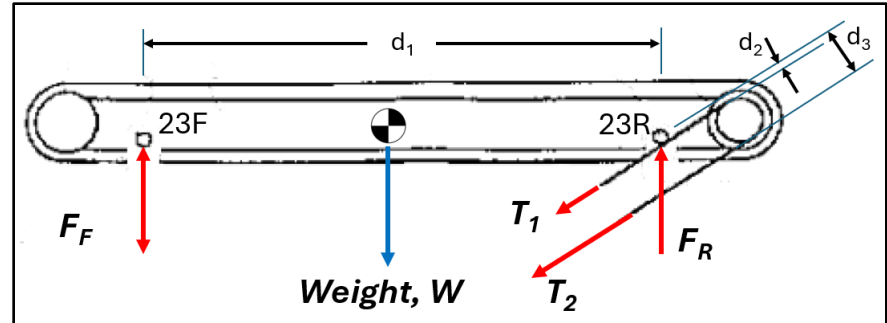
Sur-Reply Opp., 3

Silence is Insufficient

Konishi's Design More Likely to Need Physical Securing



Ex. 2006, ¶83 (re McLaughlin's conveyor belt unit)



Ex. 2006, ¶83 (re Konishi's conveyor belt unit)

Konishi's conveyor belt unit is *more likely* to require physical securing than McLaughlin's. Because Petitioner's commercial embodiments demonstrate that McLaughlin's conveyor belt units are secured using tools and locking nuts, a POSITA would have been motivated to also secure Konishi's conveyor belt unit using similar physical mechanisms.

Ex. 2006, ¶84

- ▶ Petitioner **did not** cross-examine Dr. Reinholtz on this opinion
- ▶ Petitioner's expert **did not** address relative securing needs

Silence is Insufficient - Friction

Conveyors Must be Secured Against Vibrations

Q. *What is the risk of not securing McLaughlin's conveyor belt unit?*

. . . What are we securing it against?

A. Yeah. So my experience would be that *these machines, they're operating in a mechanically robust environment and there can be vibrations.* So I might be worried about vibrations. And if there were vibrations that ended up causing the conveyor to vibrate up, then, as a -- and the predecessor conveyor would hit a lip of the conveyor and potentially cause the food product not to get on top of the conveyor.

Q. [] And as we talked about earlier, the only available motion for that conveyor belt unit in McLaughlin is up out of rear notch . . . *So the concern would be that the conveyor belt, through vibrations or other forces, might pop out of rear notch. Do I have that right?*

A. *I think that's fair.*

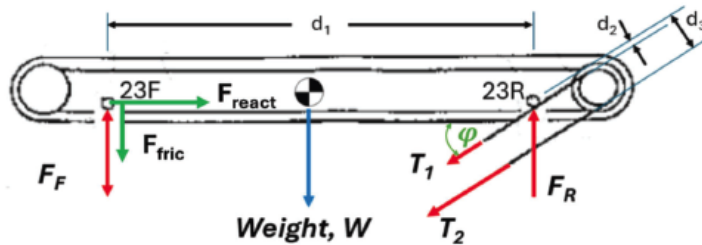
Ex. 2014 (Collins Depo. Trans.), 32:2-24, 44:3-14 (discussing his opinion that Konishi would be “secured to ensure it does not pop out of place during operation” via a “combination of the weight that holds it in place and friction”).

POR, 29 (annotated)

Silence is Insufficient – Friction (cont.)

Dr. Collins Force Analyses Failed to Consider Vibrations

37. I modified Dr. Reinholtz 's free-body diagram to show the reactive forces in green to counteract the horizontal belt tension force (F_{react}) and the resulting frictional force (F_{fric}) between the pin 23F and the wall of hook groove 26F as shown below:



Ex. 1040, ¶37

39. The chart plots the ratio of the weight at which the conveyor will lift due to the belt tension as a function of belt angle (ϕ). The results show that for any T_1/T_2 ratio and at reasonable belt angles, such as illustrated by Konishi at $\sim 33^\circ$, the weight would have to be NEGATIVE to satisfy the equation. In other words, one would need to lift the conveyor to have it pop-up in use. There is no weight under which the conveyor will be lifted.

Ex. 1040, ¶39

- ▶ Q. In either your *McLaughlin* or *Konishi* force analyses here, have you considered vibrational forces that act on the conveyor units when in operation? ... Have you discussed them?
- ▶ A. I did not discuss them.

Ex. 2016, 54:20-55:2

Silence is Insufficient – Friction (cont.)

Weigh Conveyors Must be Secured Against Vibrations

As recognized in Del Rosso, one of the Petitioner's background references submitted in this case, vertically stacked weigh conveyors are particularly susceptible to dynamic forces which can interfere with inaccurate readings in high-speed operations:

Such assemblies are accordingly statically imbalanced and top-heavy and therefor inherently subject to magnification of typically encountered dynamic unbalancing forces which when transmitted to the article weight detecting mechanism result in inaccurate weight measurement reports. Also, such encounters may apply physically destructive forces upon the mechanism such as call for constant maintenance attention; shut-downs, and repair expenses.

...

Such unbalancing impulses may be introduced for example by environmental shop noises; conveyor belt flutterings; drive chain or belt chatter vibrations; vagarious placements on the conveyor of the items to be weighed, and the intermittent item on-loading/off loading effects on the conveyor such as tend to disrupt smooth running operations of the conveyor. In prior machines, such impulses develop into torque moment forces and on occasion acquire resonance, and operate through substantial leverages relative to weight-measuring mechanism; *thereby interfering with accurate readings especially in the case of high speed operations.*

Ex. 1025, 1:31-53. A POSITA would have understood the importance in accounting for vibrations and dynamic forces when implementing the weigh conveyors of McLaughlin and Konishi to ensure accurate readings.

Ex. 2015, ¶7 (annotated)

► Petitioner declined to cross-examine PO's expert

Silence is Insufficient – Friction (cont.)

POSITA Would Not Rely on Friction to Secure Conveyor Units

12. As a preliminary matter, a POSITA would never rely on friction to secure a running conveyor like Konishi's or McLaughlin's. 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, particularly given the specific mechanical designs and friction forces at issue here. Unreliable forces, such as those do to friction, can be difficult to calculate. For example, the coefficient of friction used in calculations is only an average value and the instantaneous coefficient will vary above and below the average. Additionally, a bump or vibration can change static friction to dynamic friction. Thus, I did not attempt to account for friction in my initial analysis, as no POSITA would be comfortable relying upon friction forces when determining if a machine would function properly.

Ex. 2015, ¶12 (annotated)

- ▶ **Petitioner elected not to cross-examine Dr. Reinholtz on this opinion**

Silence is Insufficient – Weight

Konishi and *McLaughlin* Conveyor Units Must be Lightweight

- ▶ A POSITA would **not** interpret *Konishi* or *McLaughlin* to teach or suggest units so heavy that gravity secures them for operation.
- ▶ Dr. Reinholtz (Ex. 2006, ¶¶75-76):
 1. “Increasing the weight of a conveyor will increase the difficulty of maneuvering the conveyor”
 2. Increased weight “could increase the risk of injury to the user while handling the conveyor”
 3. “[M]inimizing conveyor belt unit weight increases the accuracy of its scale”
- ▶ Dr. Collins (Ex. 2014, 20:7-21:12, 23:7-15, 43:1-13):
 - ▶ Agreed that a POSITA would understand lightweight conveyors in *Konishi* and *McLaughlin* preferred for ease of removal/installation and for weight accuracy.

Insufficient to Hand-wave Toward Securing Mechanisms Generally Known

Dr. Collins summarizes multiple responsive pieces of prior art that show conventional, toolless mechanical devices that would have been used to lock a conveyor in place. (EX1040, ¶¶16-25.) Dr. Collins also goes a step further and explains how a POSA would have implemented these devices into a system with a removable conveyor, even though not required to show obviousness. (*Id.*, ¶¶26-33.)

The Federal Circuit has previously affirmed PTAB decisions that rendered claims obvious based on testimony of generally known components. *See Koninklijke Philips N.V. v. Google LLC*, 948 F.3d 1330, 1338-39 (Fed. Cir. 2020) (affirming single reference obviousness where missing limitation was “generally known” in the art). The same result applies here.

Accordingly, the Board should determine that Grounds 2-4 render obvious the toolless installation/removal limitations for these reasons.

7 mutually exclusive “design options” spanning 10 background references

Insufficient to Hand-wave Toward Securing Mechanisms Generally Known (cont.)

▶ Dr. Collins: Grounds 2-4 **do not** add latches.

▶ Ex. 2016, 20:11-16

- ▶ Q. In ground two, are you relying on any physical components that are described in any reference other than *Konishi and Lindee*?
- ▶ A. *Konishi* and *Lindee* disclose all of the elements that are in [Ground] two.

▶ Ex. 2016, 24:14-20

- ▶ Q. Am I correct that grounds two and three do not rely on any physical mechanisms taught by any reference other than the named references in those grounds, *Konishi*, *McLaughlin* and *Lindee*?
- ▶ A. Yeah, in combination with what a person of ordinary skill would know.
- ▶ Q. [D]o the theories in ground two and ground three rely on any physical mechanisms that are captured by the knowledge of a POSA?
- ▶ A. No, just the -- the cited references and the way, you know, you need some skill to combine those references.

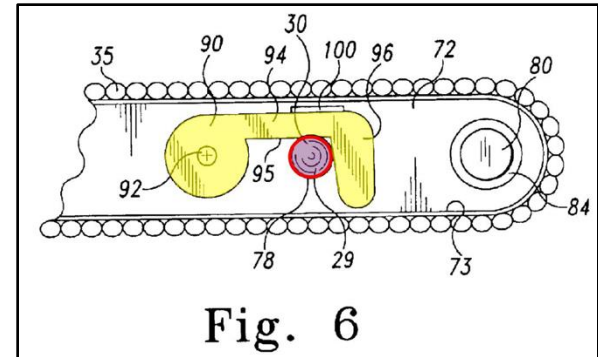
▶ Ex. 2016, 28:9-23

- ▶ Q. Are there any combinations of *McLaughlin* and any other reference that you intend to be captured by ground three?
- ▶ A. No, just *McLaughlin* in light of the person -- knowledge of a person of ordinary skill.
- ▶ Q. And within the knowledge of a person of ordinary skill, have you proposed and described any specific modifications, physical modifications, to *McLaughlin*'s system that you intend to be captured by ground three?
- ▶ A. I don't believe any are needed.
- ▶ Q. Have you described and proposed them?
- ▶ A. I have not because I don't think any are needed.



Herman's and Mathues' Latches

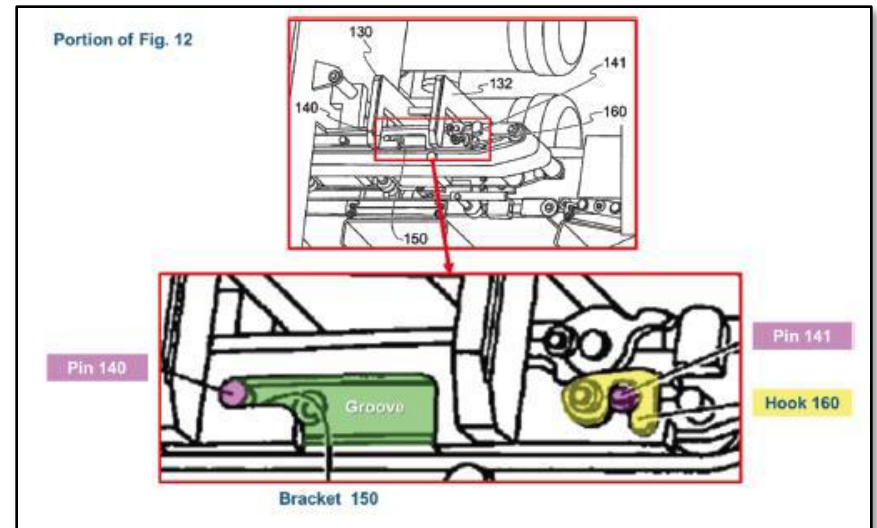
- **Ground 5: *McLaughlin/Herman***



Herman, Fig. 6 (annotated)

- ## ► Ground 6: *Konishi/Mathues*

- ▶ Neither latch secures against movement experienced by *Konishi* and *McLaughlin*



Mathues, Fig. 12 (annotated)

Herman's Latch Resists No Rotational Forces

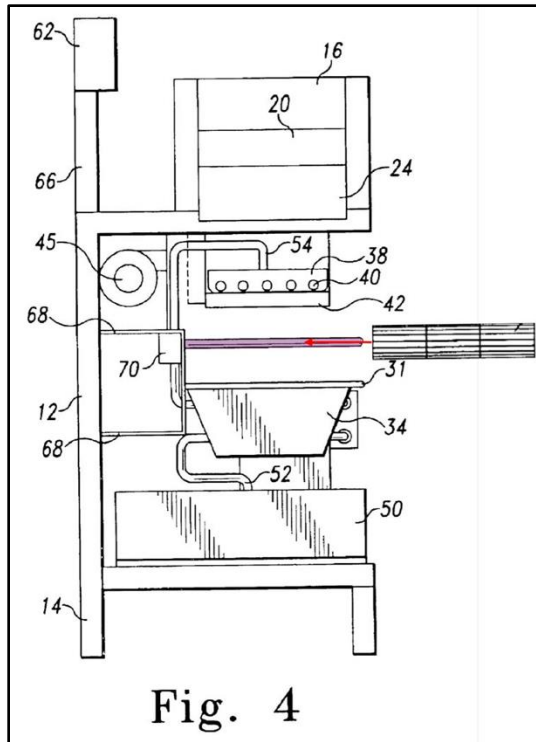


Fig. 4

Herman, Fig. 4 (annotated)

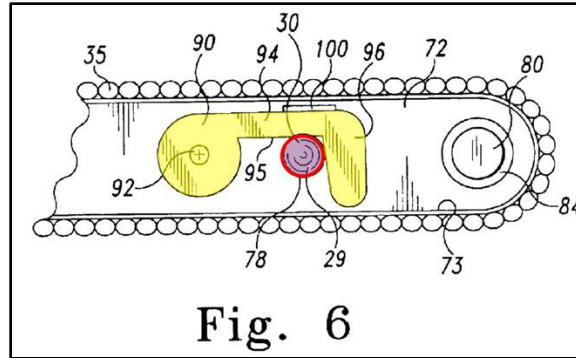


Fig. 6

Herman, Fig. 6 (annotated)

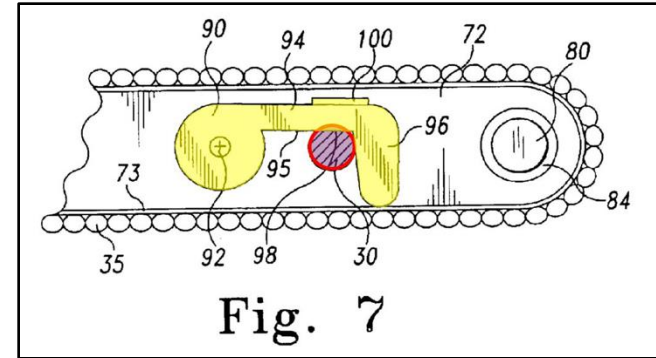
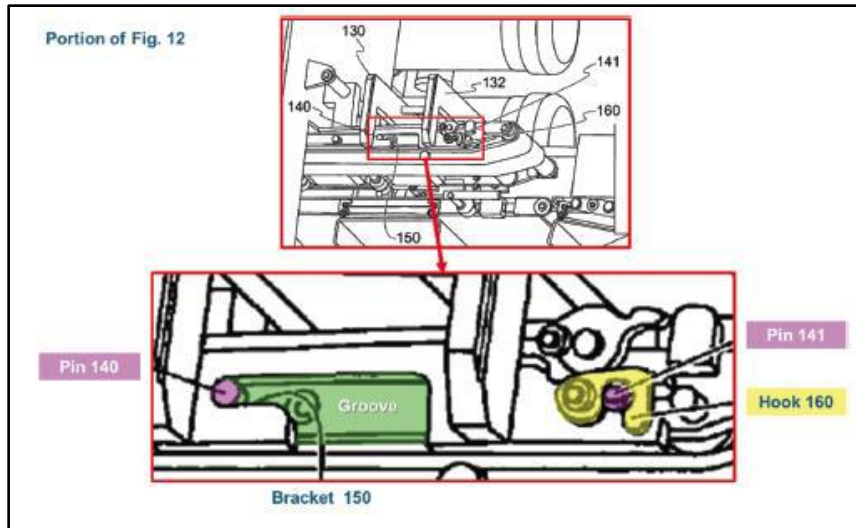


Fig. 7

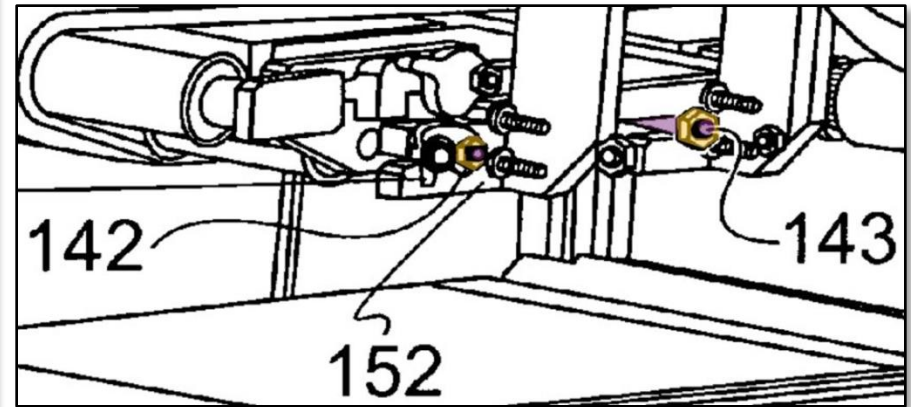
Herman, Fig. 7 (annotated)

- ▶ Herman's conveyor is installed by sliding tubing element 78 over outwardly projecting support rods 30 (purple).
- ▶ Herman's latch 90 (yellow) does not resist movement in the X or Y direction, only in the Z direction (toward the viewer in Figs. 6-7).

Mathues' Conveyor is Bolted for Operation



Mathues, Fig. 12 (annotated)



Mathues, Fig. 13 (annotated)

- ▶ Mathues' hook used for installation.
- ▶ Conveyor belt unit is secured **for operation** by nut and bolt assembly 143 (Fig. 13).

Herman's and Mathues' Latches Insufficient

- ▶ PO's Expert: *Herman's* latch ineffective, securing against Z-direction forces only. Ex. 2015, ¶¶19-23.
 - ▶ Petitioner's expert ignored this discrepancy, and Petitioner declined to cross-examine PO's expert.
- ▶ PO's Expert: *Mathues'* latch even less applicable—does not resist movement at all during operation. Ex. 2015, ¶¶25-27.
 - ▶ Petitioner's expert ignored securing bolt entirely, and Petitioner declined to cross-examine PO's expert.

Grounds 5 and 6 Require Biasing Springs

12 Q (By Mr. Hart) And those latch systems
13 would also prevent inadvertent displacement from
14 vibrational forces. Correct?
15 MR. FELDHAKE: Same objection.
16 A Again, the hooks could vibrate out as
17 well, so not necessarily.
18 Q (By Mr. Hart) So those two latch
19 mechanisms, the Herman latch mechanism and the
20 Matthews latch mechanism, would be potentially
21 subject to displacement due to vibrational
22 forces. Is that your testimony?
23 A Well, you're talking hypotheticals, so
24 hypothetically sure.

Ex. 2016, 56:12-24 (annotated)

A POSA then would have installed Herman's latch on the permanent structure of the slicer and used it to secure the removable conveyor belt unit after it has been installed. Further, if necessary, a POSA would have re-oriented the latch in a manner that would secure the conveyor belt unit against the specific forces that the removable conveyor belt unit would have seen during operation or accidental contact. A POSA would have done this by observing which direction the removable conveyor belt unit was most likely to accidentally be knocked out of place, and then orienting the latch in a way that opposed those forces. Additionally, as I explained in the "Obvious Design Options" section, a POSA would have added a spring to the latch to bias the latch in the closed direction, locking the latch and removable conveyor belt unit.

Ex. 1040, ¶155; see also *id.*, ¶231 (same re *Matheus*).

- ▶ PO's Expert: Adding bias spring from a separate reference creates new problems unaddressed by Petitioner. Ex. 2015, ¶¶24, 28.
 - ▶ Petitioner declined to cross-examine PO's expert.

Objective Evidence of Non-obviousness

Commercial Success

- ▶ PO's US Entity, Weber Inc., achieved largest increase in year-over-year sales after the TS700 released.
- ▶ From 2016–2021, 44% of sales attributed to TS700 Slicer.

Objective Evidence of Non-obviousness

Commercial Success

► Nexus (Customer Demand—Dietz & Watson)

Dietz and Watson has, oh, I'm just going to guess 12, 13, 14 slicers. And they've got some 900 series slicers from us. Some 903s and 904s. And they migrated to the Textors. And for the reasons we've explained, they really like the removable cassette. They like the hygienic design of it. They like the simplicity of the slicer. They like the speed of it.

They easily could have bought another 804 or 904 or 906 slicer, but they have moved all of their slicing to the Textor platform because of the technological improvements that the Textor has.

Ex. 1054, 69:14-70:4

you know, our customers -- time is -- time is critical for our customers. And reliability, the speed at which you're able to get product down the line and the speed at which you're able to convert that and change products is important.

...

And Dietz and Watson is unique because they got over 250 different SKUs they run, different products. During the day they might change over two or three times on a slicer to different products.

And so the speed at which they can do that is important because it gets them back into producing.

And the removable cassette allows them to do that.

Ex. 1054, 70:11-71:7

Objective Evidence of Non-obviousness

Long-Felt but Unsolved Needs

► Inventor Mayer:

Q. In your own words, how would you describe your invention on the '487 patent?

...

And we also wanted to create something new that a customer can do an easy and quick but also perfect sanitation process by taking out some parts of the machine which should not remain in the machine during cleaning due to the handling and the potential risk of contamination.

...

Because once you have a close look on that procedure at a customer production line, those operators are not allowed to have tools with them. So to allow a perfect handling of that equipment, it needs to be toolless.