

From: [Justin Gillett](#)
To: [Keeler, Robert](#); [Brandon Hernandez](#)
Cc: [Jack Phillips](#); [David A. Bilson](#); [John Shaw](#); arussell@shawkeller.com; [Metjahic, Safet](#); [Sheehan, Kenneth](#); SKNationalSteelCar@shawkeller.com; [IM-NSClit](#); [Brian Horne](#); [Sean Murray](#); [Peter Toller](#); [Lit FCAL.001L](#)
Subject: RE: National Steel Car Limited v. FreightCar America, Inc. - Defendant's Supplemental Document Production
Date: Wednesday, April 16, 2025 6:22:27 PM
Attachments: [image001.png](#)

Rob,

As a courtesy, FreightCar America will produce higher quality versions of FCA003 and FCA004.

Best regards,
Justin

Justin Gillett

Partner

Justin.Gillett@knobbe.com

949-721-6322 Direct

Knobbe Martens

2040 Main St., 14th Fl.

Irvine, CA 92614

www.knobbe.com/justin-gillett

From: Robert.Keeler@icemiller.com <Robert.Keeler@icemiller.com>
Sent: Wednesday, April 16, 2025 12:11 PM
To: Brandon Hernandez <Brandon.Hernandez@knobbe.com>
Cc: Jack Phillips <JCP@PMHDELaw.com>; David A. Bilson <DAB@PMHDELaw.com>; John Shaw <jshaw@shawkeller.com>; arussell@shawkeller.com; Safet.Metjahic@icemiller.com; Ken.Sheehan@icemiller.com; SKNationalSteelCar@shawkeller.com; IM-NSClit@icemiller.com; Justin Gillett <Justin.Gillett@knobbe.com>; Brian Horne <Brian.Horne@knobbe.com>; Sean Murray <Sean.Murray@knobbe.com>; Peter Toller <Peter.Toller@knobbe.com>
Subject: RE: National Steel Car Limited v. FreightCar America, Inc. - Defendant's Supplemental Document Production

Brandon,

FreightCar's last two productions contain many illegible pages, especially when compared with the images in the Appendices to the Invalidity Contentions, which contain more detail and color depth. For example, page 1 of Appendix B shows a schematic of Bethlehem Steel BCIM Ore Car, which, as far as can be discerned, relates to documents bearing Bates Nos. FCA0000212 and FCA0000213. FCA0000212 and -213 are far less legible than the picture on page 1 of Appendix B. Please reproduce documents bearing Bates numbers FCA0000212-825 so that they are legible and match the image quality of the images to the Appendices to the Invalidity Contentions.

Regards,
Rob

Robert Keeler | Associate



P 212-824-4961

1500 Broadway Suite 2900 New York, NY 10036

Robert.Keeler@icemiller.com | icemiller.com

From: Brandon Hernandez <Brandon.Hernandez@knobbe.com>

Sent: Tuesday, April 15, 2025 4:52 PM

To: John Shaw <jshaw@shawkeller.com>; arussell@shawkeller.com; Metjahic, Safet <Safet.Metjahic@icemiller.com>; Keeler, Robert <Robert.Keeler@icemiller.com>; Sheehan, Kenneth <Ken.Sheehan@icemiller.com>; SKNationalSteelCar@shawkeller.com; IM-NSClit <IM-NSClit@icemiller.com>

Cc: Jack Phillips <JCP@PMHDELaw.com>; David A. Bilson <DAB@PMHDELaw.com>; Justin Gillett <Justin.Gillett@knobbe.com>; Brian Horne <Brian.Horne@knobbe.com>; Sean Murray <Sean.Murray@knobbe.com>; Peter Toller <Peter.Toller@knobbe.com>

Subject: National Steel Car Limited v. FreightCar America, Inc. - Defendant's Supplemental Document Production

Counsel,

FreightCar America noticed a few documents missing from its production of known related invalidating references. FreightCar America is producing those documents bearing production numbers FCA0000766 - FCA0000825, which are available for download at the link below.

ShareFile Link: <https://knobbe.sharefile.com/public/share/web-s6558eb8d48d148baae326a9fddc1ca2d>

Please let me know if there are any issues with the link.

Regards,

Brandon Hernandez

Litigation Paralegal

Brandon.Hernandez@knobbe.com

949-721-2959 Direct

Knobbe Martens

2040 Main St., 14th Fl.

Irvine, CA 92614

www.knobbe.com

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