DECLARATION OF JUNE ANN MUNFORD

1. My name is June Ann Munford. I am over the age of 18, have personal knowledge of the facts set forth herein, and am competent to testify to the same.

2. I earned a Master of Library and Information Science (MLIS) from the University of Wisconsin-Milwaukee in 2009. I have over ten years of experience in the library/information science field. Beginning in 2004, I have served in various positions in the public library sector including Assistant Librarian, Youth Services Librarian and Library Director. I have attached my Curriculum Vitae as Appendix CV.

3. During my career in the library profession, I have been responsible for materials acquisition for multiple libraries. In that position, I have cataloged, purchased and processed incoming library works. That includes purchasing materials directly from vendors, recording publishing data from the material in question, creating detailed material records for library catalogs and physically preparing that material for circulation. In addition to my experience in acquisitions, I was also responsible for analyzing large collections of library materials, tailoring library records for optimal catalog

search performance and creating lending agreements between libraries during my time as a Library Director.

4. I am fully familiar with the catalog record creation process in the library sector. In preparing a material for public availability, a library catalog record describing that material would be created. These records are typically written in Machine Readable Catalog (herein referred to as "MARC") code and contain information such as a physical description of the material, metadata from the material's publisher, and date of library acquisition. In particular, the 008 field of the MARC record is reserved for denoting the date of creation of the library record itself. As this typically occurs during the process of preparing materials for public access, it is my experience that an item's MARC record indicates the date of an item's public availability.

5. Typically, in creating a MARC record, a librarian would gather various bits of metadata such as book title, publisher and subject headings among others and assign each value to a relevant numerical field. For example, a book's physical description is tracked in field 300 while title/attribution is tracked in field 245. The 008 field of the MARC record is reserved for denoting the creation of the library record itself. As this is the only date reflecting the inclusion of said materials within the library's collection, it is my experience

that an item's 008 field accurately indicates the date of an item's public availability.

6. I have reviewed Exhibit EX-1025, Paper Machine Clothing (1997 Printing) by Sabit Adanur.

7. Attached hereto as Appendix ADANAR01 is a true and correct copy of the MARC record for Paper Machine Clothing (1997 Printing) as held by the University of Minnesota Library. I secured this record myself from the library's public catalog. The MARC record contained within Appendix ADANAR01 accurately describes the title, author, publisher, and ISBN number of Paper Machine Clothing (1997 Printing). In comparing Exhibit EX-1025 to Appendix ADANAR01, it is my determination that Exhibit EX-1025 is a true and correct copy of Paper Machine Clothing (1997 Printing) by Sabit Adanur.

8. The 008 field of the MARC record in Appendix ADANAR01 indicates the date of record creation. The 008 field of Appendix ADANAR01 indicates the University of Minnesota Library first acquired Paper Machine Clothing (1997 Printing) as of June 9, 1997. Considering this information, it is my

determination that Paper Machine Clothing (1997 Printing) was made available to the public shortly after its initial acquisition as of June 9, 1997.

9. I have reviewed Exhibit EX-1021, Paper Machine Clothing (2017 Printing) by Sabit Adanur.

10. Attached hereto as Appendix ADANAR02 is a true and correct copy of the MARC record for Paper Machine Clothing (2017 Printing) as held by the University of California Irvine Library. I secured this record myself from the library's public catalog. The MARC record contained within Appendix ADANAR02 accurately describes the title, author, publisher, and ISBN number of Paper Machine Clothing (2017 Printing). In comparing Exhibit EX-1021 to Appendix ADANAR02, it is my determination that Exhibit EX-1021 is a true and correct copy of Paper Machine Clothing (2017 Printing) by Sabit Adanur.

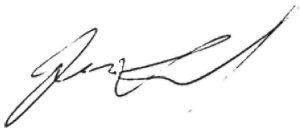
11. The 008 field of the MARC record in Appendix ADANAR02 indicates the date of record creation. The 008 field of Appendix ADANAR02 indicates the University of California Irvine Library first acquired Paper Machine Clothing (2017 Printing) as of June 8, 2017. Considering this information, it

is my determination that Paper Machine Clothing (2017 Printing) was made available to the public shortly after its initial acquisition as of June 8, 2017.

12. I have been retained on behalf of the Petitioner to provide assistance in the above-illustrated matter in establishing the authenticity and public availability of the documents discussed in this declaration. I am being compensated for my services in this matter at the rate of $200.00 per hour plus reasonable expenses. My statements are objective, and my compensation does not depend on the outcome of this matter.

13. I declare under penalty of perjury that the foregoing is true and correct. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Dated: 6/4/2025



June Ann Munford

APPENDIX CV

June A. Munford
Curriculum Vitae

Education

University of Wisconsin-Milwaukee - MS, Library & Information Science, 2009
Milwaukee, WI

- Coursework included cataloging, metadata, data analysis, library systems, management strategies and collection development.
- Specialized in library advocacy, cataloging and public administration.

Grand Valley State University - BA, English Language & Literature, 2008
Allendale, MI

- Coursework included linguistics, documentation and literary analysis.
- Minor in political science with a focus in local-level economics and government.

Professional Experience

Researcher / Expert Witness, October 2017 – present
Freelance ● Pittsburgh, Pennsylvania & Grand Rapids, Michigan

- Material authentication and public accessibility determination. Declarations of authenticity and/or public accessibility provided upon research completion. Experienced with appeals and deposition process.

- Research provided on topics of public library operations, material publication history, digital database services and legacy web resources.

- Past clients include Alston & Bird, Arnold & Porter, Baker Botts, Fish & Richardson, Erise IP, Irell & Manella, O'Melveny & Myers, Perkins-Coie, Pillsbury Winthrop Shaw Pittman and Slayden Grubert Beard.

Library Director, February 2013 - March 2015
Dowagiac District Library ● Dowagiac, Michigan

- Executive administrator of the Dowagiac District Library. Located in Southwest Michigan, this library has a service area of 13,000, an annual operating budget of over $400,000 and total assets of approximately $1,300,000.

● Developed careful budgeting guidelines to produce a 15% surplus during the 2013-2014 & 2014-2015 fiscal years while being audited.

● Using this budget surplus, oversaw significant library investments including the purchase of property for a future building site, demolition of existing buildings and building renovation projects on the current facility.

● Led the organization and digitization of the library's archival records.

● Served as the public representative for the library, developing business relationships with local school, museum and tribal government entities.

● Developed an objective-based analysis system for measuring library services - including a full collection analysis of the library's 50,000+ circulating items and their records.

November 2010 - January 2013
Librarian & Branch Manager, Anchorage Public Library ● Anchorage, Alaska

● Headed the 2013 Anchorage Reads community reading campaign including event planning, staging public performances and creating marketing materials for mass distribution.

● Co-led the social media department of the library's marketing team, drafting social media guidelines, creating original content and instituting long-term planning via content calendars.

● Developed business relationships with The Boys & Girls Club, Anchorage School District and the US Army to establish summer reading programs for children.

June 2004 - September 2005, September 2006 - October 2013
Library Assistant, Hart Area Public Library
Hart, MI

● Responsible for verifying imported MARC records and original MARC cataloging for the local-level collection as well as the Michigan Electronic Library.

● Handled OCLC Worldcat interlibrary loan requests & fulfillment via ongoing communication with lending libraries.

Professional Involvement

Alaska Library Association - Anchorage Chapter

● Treasurer, 2012

Library Of Michigan
● Level VII Certification, 2008
● Level II Certification, 2013

Michigan Library Association Annual Conference 2014
● New Directors Conference Panel Member

Southwest Michigan Library Cooperative
● Represented the Dowagiac District Library, 2013-2015

Professional Development

Library Of Michigan Beginning Workshop, May 2008
Petoskey, MI
● Received training in cataloging, local history, collection management, children's literacy and reference service.

Public Library Association Intensive Library Management Training, October 2011
Nashville, TN
● Attended a five-day workshop focused on strategic planning, staff management, statistical analysis, collections and cataloging theory.

Alaska Library Association Annual Conference 2012 - Fairbanks, February 2012
Fairbanks, AK
● Attended seminars on EBSCO advanced search methods, budgeting, cataloging, database usage and marketing.

Depositions

2019 ● Fish & Richardson

Apple v. Qualcomm (Case No. IPR2018-001281, 39521-00421IP, IPR2018-01282 and 39521-00421IP2)

2019 ● Erise IP

Implicit, LLC v. Netscout Systems, Inc (Case No. 2:18-cv-53-JRG)

2019 ● Perkins-Coie

Adobe Inc. v. RAH Color Technologies LLC (Case No. IPR2019-00627, IPR2019-00628, IPR2019-00629 and IPR2019-00646)

2020 ● O'Melveny & Myers

Maxell, Ltd. v. Apple Inc. (Case No. 5:19-cv-00036-RWS)

2021 ● Pillsbury Winthrop Shaw Pittman LLP

Intel v. SRC (Case No. IPR2020-1449)

2022 ● Perkins-Coie

Realtek v. Future Link (Case No. IPR2021-01182)

2023 ● Fish & Richardson

Neuroderm Ltd. v. Abbvie, Inc (Case No. PGR2022-00040)

2023 ● Fish & Richardson

Nearmap US Inc. v. Pictometry International Corp. (Case No. IPR2022-00735)

2023 ● Fish & Richardson

Samsung Electronics v. MemoryWeb LLC (Case No. 39843-0136PS1)

2023 ● Pillsbury Winthrop Shaw Whitman LLP

Gravel Rating Systems v. Costco Wholesale Corp. (Case No. 4:21-cv-149-ALM)

2024 ● Willkie-Farr

Netflix, Inc. v. VideoLabs. Inc. (Case No. IPR2023-00628)

2024 ● Quinn Emanuel Urquhart & Sullivan

Purdue University v. Wolfspeed (Case No. 1:21-CV-840)

2024 ● Fish & Richardson

Dish Network v. Entropic Communications (Case No. IPR2024-00393)

2025 ● Perkins Coie

Amazon.com, Inc. v. Nokia Technologies Oy (Case No. IPR2024-00572)

2025 ● Fish & Richardson

Dish Network v. Entropic Communications (Case No. IPR2024-00373)

Limited Case and Clientele History

Alston & Bird

● Ericsson

v. Collision Communications (Case No. IPR2022-01233)

● Nokia

v. Neptune Subsea, Xtera (Case No. 1:17-cv-01876)

● Universal Electronics Inc

v. Roku Inc (Case No. IPR2022-00818)

Alavi & Anaipakos PLLC

● Stingray Group Inc. and Stingray Music USA, Inc.

v. Edwin A. Hernandez-Mondragon and Egla Corp. (Case No. 1:24-cv-21226-RAR)

Arnold & Porter

● Ivantis

v. Glaukos (Case No. 8:18-cv-00620)

● Samsung

v. Jawbone (Case No. 2:21-cv-00186)

Benesch Friedlander Coplan & Aronoff

- Voyis

  v. Cathx (Case No. 5:21-cv-00077-RWS)

Buchanan, Ingersoll & Rooney PC

- Google LLC, AT&T Service Inc., T Mobile USA Inc., Cellco Partnership, Ericsson Inc. & Nokia of America Corp.

  v. KT Corp & Pegasus Wireless Innovation LLC (Case No. IPR2025-00293)

Deschert LLP

- Smaxtec Animal Care

  v. ST Reproductive Technologies, LLC (Case No. IPR2024-00885)

Duane Morris

- Kangxi Communication Technologies

  v. Skyworks Solutions Inc. (Case No. IPR2025-00373)

- Microsoft

  v. Edge Networking Systems LLC (Case No. 1:24-cv-00215)

Erise I.P.

- Apple

  v. Ericsson Inc. (Case No. IPR2022-00715)

  v. Future Link Systems (Case No. IPRs 6317804, 6622108, 6807505, and 7917680)

  v. INVT (Case No. 20-1881)

  v. Navblazer LLC (Case No. IPR2020-01253)

  v. Qualcomm (Case No. IPR2018-001281, 39521-00421IP, IPR2018-01282, 39521-00421IP2)

v. Quest Nettech Corp (Case No. 2:19-cv-00118-JRG)

v. Telefonaktiebolaget LM Ericsson (Case No. IPR2022-00275)

v. Theta IP, LLC (Case No. IPR2024-00818)

v. THL Holding Company LLC (Case No. 1:23-cv-00548)

- Fanduel

  v. CGT (Case No. 19-1393)

- Garmin

  v. Phillips North America LLC (Case No. 2:19-cv-6301-AB-KS)

- Netscout

  v. Longhorn HD LLC (Case No. 2:20-cv-00349)

  v. Implicit, LLC (Case No. 2:18-cv-53-JRG)

- Sony Interactive Entertainment LLC

  v. Bot M8 LLC (Case No. IPR2020-01288)

  v. Infernal Technology LLC (Case No. 2:19-CV-00248-JRG)

- Tesla

  v. Charge Fusion Technologies LLC (Case No. IPR2025-00032)

- Unified Patents

  v. GE Video Compression (Case No. 2:19-cv-248)

Fish & Richardson

- Apple

  v. AliveCor (Case No. 3:21-cv-03958)

  v. LBS Innovations (Case No. 2:19-cv-00119-JRG-RSP)

  v. Koss Corporation (Case No. IPR2021-00305)

v. Masimo (Case No. IPR 50095-0012IP1, 50095-0012IP2, 50095-0013IP1, 50095-0013IP2, 50095-0006IP1, 50095-0135IP1)

v. Neonode (Case No. 21-cv-08872-EMC)

v. Qualcomm (Case No. IPR2018-001281, 39521-00421IP, IPR2018-01282, 39521-00421IP2)

v. Resonant Sys. (Case No. 7:23-cv-00077-ADA)

- AsusTek Computer Inc.
  v. Videolabs, Inc. (Case No. 22-CV-00720-ADA)

- Dell
  v. Neo Wireless (Case No. IPR2022-00616)

- Dish Network

  v. Entropic Communications, LLC (Case No. 2:2023-CV-01043)

  v. Entropic Communications LLC (Case No. IPR2024-00393)

  v. Realtime Adaptive Streaming (Case No. 1:17-CV-02097-RBJ)

  v. TQ Delta LLC (Case No. 18-1798)

- Evapco Dry Cooling

  v. SPG Dry Cooling (Case No. IPR2021-00688)

- Genetec

  v. Sensormatic Electronics (Case No. 1:20-CV-00760)

- Huawei

  v. Bell Northern Research LLC (Case No. IPR2019-01174)

- Kianxis

  v. Blue Yonder (Case No. 3:20-cv-03636)

- LG Electronics

  v. Bell Northern Research LLC (Case No. 3:18-cv-2864-CAB-BLM)

- MediaTek

  v. MOSAID (Case No. IPR2024-00718)

- Metaswitch

  v. Sonus Networks (Case No. IPR2018-01719)

- Microsoft

  v. Throughputer Inc (Case No. IPR2022-00757)

- Mom Enterprises

  v. Ddrops Company (Case No. 1:22-cv-00332)

- MLC Intellectual Property

  v. MicronTech (Case No. 3:14-cv-03657-SI)

- Nearmap Inc

  v. EagleView Technologies (Case No. IPR2022-01009)

- Neuroderm Ltd.

  v. Abbvie, Inc (Case No. PGR2022-00040)

- Posco Co Ltd.

  v. Pascal Drillet et al. (Case No. IPR2025-00370)

- Realtek Semiconductor

  v. Future Link (Case No. IPR2021-01182)

- Quectel
  - v. Koninklijke Philips (Case No. 1:20-cv-01710)

- Samsung
  - v. Aire Technology (Case No. IPR2022-00877)
  - v. Bell Northern Research (Case No. 2:19-cv-00286-JRG)
  - v. Communication Technologies Inc (Case No. IPR2022-01221)
  - v. Jawbone Innovations (Case No. IPR2022-00865)
  - v. MemoryWeb LLC (Case No. IPR2022-00885)
  - v. Dodots Licensing Solutions (Case No. IPR2023-00701)
  - v. Telefonaktiebolaget LM Ericsson (Case No. IPR2021-00615)

- Texas Instruments
  - v. Vantage Micro LLC (Case No. IPR2020-01261)

- Xilinx
  - v. Sentient Sensors LCC (Case No. 1:22-cv-00173)

Goodwin Proctor

- Intel
  - v. Proxense, LLC (Case No. 6:24-cv-00283)

- Samsung Electronics
  - v. Mobile Data Technologies (Case No. 2:24-cv-00435)

- Taiwan Semiconductor Manufacturing Company Ltd.
  - v. Advanced Integrated Circuit Process LLC (Case No. 2:24-cv-00623)

Groombridge Wu

- Nearmap

  v. Eagle View Technologies Inc. and Pictometry International Corp. (Case No. 2:21-cv-00283-TS-DAO)

Irell & Manella

- Curium

Latham & Watkins LLP

- Apple

  v. Advanced Coding Research LLC

Leydig, Voit & Mayer, Ltd.

- Public Availability Consultancy

O'Melveny & Myers

- Apple

  v. Maxell (Case No. 5:19-cv-00036-RWS)

- Disney Media & Entertainment Distribution LLC

  v. Digital Media Technology Holdings, LLC (Case No. 2:22-cv-01642)

- Micron Technology Inc.

  v. Besang Inc (Case No. IPR2023-00900)

- Samsung

  v. Daedalus Prime LLC (1335 Investigation)

Perkins-Coie

- Amazon
  - v. Nokia (Case No. IPR2024-00847 and IPR2024-00848)
  - v. Nokia Technologies Oy (Case No. IPR2024-00572)
- Heru Industries
  - v. The UAB Research Foundation (Case No. IPR2022-01148)
- Intel Corporation
  - v. BeSang Inc. (Case No. IPR2023-00991)
  - v. BitMICRO (Case No. 5:23-cv-00625)
  - v. Telefonaktiebolaget L M Ericsson (Case No. IPR2024-00610)
- Realtek Semiconductor
  - v. Future Link (Case No. IPR2021-01182)
- r-pac
  - v. Adasa, Inc. (Case No. 1:2024cv06102)
- Twitter Inc
  - v. VOIP-Pal.com (Case No. 3:20-cv-02397-JD)
- TCL Industries
  - v. Koninklijke Philips NV (Case No. IPR2021-00495, IPR2021-00496 and IPR2021-00497)
- VusionGroup
  - v. Hanshow (Case No. IPR2024-00857)

Pillsbury Winthrop Shaw Pittman

- Intel

  v. FG SRC LLC (Case No. 6:20-cv-00315)

- Gravel Rating Systems

  v. Costco (Case No. 4:21-cv-149)
  v. Lowe's Home Centers (Case No. 4:21-cv-150)
  v. T-Mobile USA (Case No. 4:21-cv-152)
  v. Kohl's Inc. (Case No. 4:21-cv-258)
  v. Under Armor (Case No. 4:21-cv-356)

Quinn Emanuel

- Exact Sciences Corporation

  v. Geneoscopy, Inc. (Case No. IPR2024-00459 and IPR2024-1330)

- ServiceNow, Inc.

  v. InQuisient, Inc. (Case No. 22-900-CJB)

- Wolfspeed

  v. The Trustees of Purdue University (Case No. 1:2021-cv-00840)

Sheppard, Mullin, Richter & Hampton LLP

- Advanced Micro Devices, Inc and Pensando Systems, Inc.

  v. Concurrent Ventures LLC and Xtreamedge, Inc. (Case No. IPR2025-00478)

- Cadence Design Systems Inc.

  v. Semiconductor Design Technologies (Case No. 3:23-cv-01001)

Shook, Hardy & Bacon LLP

- HP Inc.

  v. Universal Connectivity Technologies (Case No. 1:23-cv-01177)

Stern, Kessler, Goldstein & Fox

- Preliminary Research

Wilmer, Cutler, Pickering, Hale and Dorr

- Apple

  v. Shunock (Case No. 1:23-cv-08598)

- Quest Diagnostics Inc., Haystack Oncology Inc. and Haystack Oncology GmbH

  v. Natera, Inc. (Case No. 1:23-cv-08598)

- Roche Diabetes, Inc.

  v. Trividia Health, Inc. (Case No. 1:24-cv-00668)

Willkie, Farr & Gallagher LLP

- Lenovo, Dell, HP

  v. Universal Connectivity Technologies Inc. (Case No. 2:2023cv00449)

- Neurent

  v. The Foundry, LLC (Case No. IPR2024-00669)

- Netflix, Inc.

  v. VideoLabs, Inc. (Case No. IPR2023-00628)

APPENDIX ADANUR01

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082     00$a676/.23 $221
100     1#$aAdanur, Sabit, $d1960-
245     10$aPaper machine clothing / $cSabit Adanur.
260     ##$aLancaster, Pa. : $bTechnomic Publishing Co. Inc., $c©1997.
300     ##$ax, 395 pages : $billustrations ; $c26 cm
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337     ##$aunmediated $bn $2rdamedia
338     ##$avolume $bnc $2rdacarrier
500     ##$aAt head of title: Asten.
504     ##$aIncludes bibliographical references and index.
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650     #0$aIndustrial fabrics
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BOOK

Paper machine clothing

Sabit Adanur, 1960- ; Asten, Inc.
Lancaster, Pa. : Technomic Publishing Co. Inc.; ©1997

Available at TC MN Library Access Center (Storage) U of M Twin Cities (TS1118.F4 A33x 1997) >

Chapters of this book (17) >

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Details

Title	Paper machine clothing
Responsibility	Sabit Adanur.
Author/Creator	Sabit Adanur, 1960- > Asten, Inc. >
Publisher	Lancaster, Pa. : Technomic Publishing Co. Inc.
Date	©1997
Copyright date	©1997.
Format	x, 395 pages : illustrations ; 26 cm
Language	English
Description	At head of title: Asten. Includes bibliographical references and index.
Subjects	Papermaking machinery felts > Papermaking > Industrial fabrics >
Identifier	LC : 97060981 ISBN: 1566765447 OCLC : 37425474
Source	University of Minnesota Catalog 9942278250001701

Associated Persons

Adanur, Sabit, 1960-

Source Library of Congress Name Authority and Wikidata

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Related Titles

Paper machine felts and fabrics. ...

©1976

Serving the paper industry. ...

1955

Surface phenomena and fine particles in water-based ...

1991

Finishing of fine papers ...

©1975

1984 Air Knife Coating Seminar : the Opryland Hotel, ...

©1984

1985 Coat Sem Drak Chic

©19

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APPENDIX ADANUR02

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072     #7$aTEC021000 $2bisacsh
082     0#$a676.23 $221
100     1#$aAdanur, Sabit, $d1960- $eauthor.
245     10$aPaper Machine Clothing : $bKey to the Paper Making Process.
250     ##$aFirst edition.
264     #1$aBoca Raton, FL : $bCRC Press, $c2017.
300     ##$a1 online resource (395 pages) : $billustrations
336     ##$atext $2rdacontent
337     ##$acomputer $2rdamedia
338     ##$aonline resource $2rdacarrier
504     ##$aIncludes bibliographical references at the end of each chapters and index.
588     ##$aDescription based on print version record.
505     0#$aChapter 1 Overview of Pulp and Paper Technology -- chapter 2 Forming -- chapter 3 Pressing -- chapter 4 Drying -- chapter 5 Paper Machine Auditing --
520     2#$a"Everyone involved in paper making knows Asten as a world class manufacturer of paper machine clothing. Perhaps less well known is that Asten started
650     #0$aPapermaking machinery felts.
650     #0$aPapermaking.
650     #0$aIndustrial fabrics.
710     2#$aAsten, Inc.
776     ##$z0-367-44816-5
776     ##$z1-56676-544-7
906     ##$aBOOK
```

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BOOK

Paper Machine Clothing : Key to the Paper Making Process.

Adanur, Sabit, 1960- author.; Asten, Inc.
2017

Available Online

Chapters of this book (17)

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DETAILS
LINKS

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Details

Creator	Adanur, Sabit, 1960- author.
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Description	"Everyone involved in paper making knows Asten as a world class manufacturer of paper machine clothing. Perhaps less well known is that Asten started in this industry more than 120 years ago. Since then the company has taken advantage of modern manufacturing techniques to produce innovative products needed by the growing paper making industry. That is why Asten commissioned Dr. Sabit Adanur to write this book - to continue spreading sophisticated papermaking knowledge throughout the global paper industry. This book discusses how the latest technological innovations help produce quality paper products. It also covers the use of TQM and computers in the papermaking process as basic paper structure and properties."--Provided by publisher.
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