

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ALBANY INTERNATIONAL CORP.,
Petitioner,

v.

VOITH PATENT GMBH,
Patent Owner

IPR2025-01116
U.S. Patent 11,261,566

**PATENT OWNER'S OBJECTIONS TO PETITIONER'S EVIDENCE
SERVED WITH PETITIONER'S REPLY TO PATENT OWNER'S
RESPONSE**

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

I. Introduction

Under the Federal Rules of Evidence (“FRE”) and 37 C.F.R. § 42.64, Voith Patent GMBH (“Patent Owner”) timely objects to evidence submitted by Albany International Corp. (“Petitioner”) in this proceeding. Patent Owner may move to exclude the challenged exhibits under 37 C.F.R. § 42.64(c) unless Petitioner timely cures the objections identified by Patent Owner below.

II. Specific Objections

A. EX1050 - U.S. Publication No. 2004/0154148 (“Nilsson”)

Under the Trial Practice Guide, this exhibit is untimely because it is relied upon to establish Petition’s case-in-chief and could have been submitted with the Petition. Under FRE 401/402/403, the exhibit is also inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time. Under FRE 801/802, to the extent this document is relied upon for the truth of the matter asserted, this document constitutes and contains inadmissible hearsay.

B. EX1051 – “Schematic Drawing”

Under the Trial Practice Guide, this exhibit is untimely because it is relied upon to establish Petition’s case-in-chief and could have been submitted with the Petition. Under FRE 401/402/403, the exhibit is also inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and

its probative value is outweighed by other considerations including prejudice, confusion and waste of time.

C. EX1053 - Second Declaration of Dr. Christopher M. Pastore

Under the Trial Practice Guide, this exhibit is untimely because it is relied upon to establish Petition's case-in-chief and could have been submitted with the Petition. Under FRE 401/402/403/702, this document includes testimony not relevant to the instituted review, because, among other things, it has not been shown that the declarant's testimony is based on sufficient facts or data or arrived at by reliable principles, procedures, or methods reliably applied to the facts of this case, or that the declarant's opinion will assist the trier of fact to understand the evidence or to determine any fact in issue and does not have a greater potential to mislead than to enlighten. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document includes testimony that is not shown to be based on first-hand knowledge including of how relied-upon data was generated, is based on speculation, and constitutes and contains inadmissible hearsay.

D. EX1054 - H. Gozde Senel Ayaz et al., Textile-templated electrospun anisotropic scaffolds for regenerative cardiac tissue engineering, Biomaterials (2014)

Under FRE 401/402/403, the exhibit is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice,

confusion and waste of time. Under FRE 801/802, to the extent this document is relied upon for the truth of the matter asserted, this document constitutes and contains inadmissible hearsay. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

E. EX1055 – “USPTO: Design patent image quality” (PPAC Operations and Design Update)

Under the Trial Practice Guide, this exhibit is untimely because it is relied upon to establish Petition’s case-in-chief and could have been submitted with the Petition. Under FRE 401/402/403, the exhibit is also inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time. Under FRE 801/802, to the extent this document is relied upon for the truth of the matter asserted, this document constitutes and contains inadmissible hearsay. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

F. EX1056 - Digital Image Analysis of Petrographic Thin Sections in Conservation Research, University of Delaware (2004)

Under the Trial Practice Guide, this exhibit is untimely because it is relied upon to establish Petition’s case-in-chief and could have been submitted with the Petition. Under FRE 401/402/403, the exhibit is also inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and

its probative value is outweighed by other considerations including prejudice, confusion and waste of time. Under FRE 801/802, to the extent this document is relied upon for the truth of the matter asserted, this document constitutes and contains inadmissible hearsay. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

G. EX1059 - U.S. Publication No. 2007/0251660 (“Walkenhaus”)

Under the Trial Practice Guide, this exhibit is untimely because it is relied upon to establish Petition’s case-in-chief and could have been submitted with the Petition. Under FRE 401/402/403, the exhibit is also inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time. Under FRE 801/802, to the extent this document is relied upon for the truth of the matter asserted, this document constitutes and contains inadmissible hearsay.

H. EX1060 - Second Declaration of June Ann Munford

Under the Trial Practice Guide, this exhibit is untimely because it is relied upon to establish Petition’s case-in-chief and could have been submitted with the Petition. Under FRE 401/402/403/702, this document includes testimony not relevant to the instituted review, because, among other things, it has not been shown that the declarant’s testimony is based on sufficient facts or data or arrived

at by reliable principles, procedures, or methods reliably applied to the facts of this case, or that the declarant's opinion will assist the trier of fact to understand the evidence or to determine any fact in issue and does not have a greater potential to mislead than to enlighten. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document includes testimony that is not shown to be based on first-hand knowledge including of the acquisition, cataloging, indexing, or public availability of the referenced materials, is based on speculation, and constitutes and contains inadmissible hearsay. Under FRE 901, this document is inadmissible because it, and the records on which it relies, have not been shown to be authenticated or identified.

I. EX1061 - Additional excerpt from Sabit Adanur, Paper Machine Clothing (2d ed. 2017)

Under the Trial Practice Guide, this exhibit is untimely because it is relied upon to establish Petition's case-in-chief and could have been submitted with the Petition. Under FRE 401/402/403, the exhibit is also inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time. Under FRE 801/802, to the extent this document is relied upon for the truth of the matter asserted, this document constitutes and contains inadmissible hearsay. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

J. EX1062 - U.S. Patent No. 5,023,132 (“Stanley”)

Under the Trial Practice Guide, this exhibit is untimely because it is relied upon to establish Petition’s case-in-chief and could have been submitted with the Petition. Under FRE 401/402/403, the exhibit is also inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time. Under FRE 801/802, to the extent this document is relied upon for the truth of the matter asserted, this document constitutes and contains inadmissible hearsay.

K. EX1063 - Definition of “fiber” from The Fairchild Books Dictionary of Textiles, eighth edition, 2014

Under the Trial Practice Guide, this exhibit is untimely because it is relied upon to establish Petition’s case-in-chief and could have been submitted with the Petition. Under FRE 401/402/403, the exhibit is also inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time. Under FRE 801/802, to the extent this document is relied upon for the truth of the matter asserted, this document constitutes and contains inadmissible hearsay. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

Date: July 23, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e)(4), the undersigned certifies that on July 23, 2026, a complete copy of the foregoing Patent Owner's Objections To Petitioner's Evidence were served on Lead and Back-up Counsel for Petitioner at the service address provided in Petitioner's Mandatory Notices:

Grace Kim, Reg. No. 71,977
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