
From: O'Connell, Jenn <jenn.oconnell@albint.com>
Sent: Tuesday, July 29, 2025 4:59 PM
To: Keck, Hans-Georg
Cc: Stein, Merle; Levine, Mark; Gaug, Joseph; Grace Kim; John Lane; Michael Kane; Larsen, Chuck; Bassmann, Martin; Schmachtel, Rainer; Klaschka, Susanne
Subject: RE: [EXT] RE: US8,353,252 - Seam PressPoint - Privileged & Confidential Attorney-Client Communication
Attachments: US8353252_SeamPressPoint MWE.pdf; Claim-Analysis 14939 Seam PressPoint.pdf

[This email originated outside of F&R.]

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Dear Hans,

Albany hopes we can have productive discussions that move us towards a resolution but does not view Voith's response below as meaningfully productive. Albany stands by its positions in our March 14, 2025, email and revisions to the term sheet, and as expressed on the parties' earlier call.

Patent owners have the burden to show infringement. Voith's response does not track the claim limitations in Voith's patents and instead merely sets forth generalizations about Albany products and the patents' claims, and conclusory statements about infringement. For example, even if "Albany advertises Seam PressPoint products as having 'the best' "seamability - [due to] straighter and evenly spaced loops," those statements do not show that the "the warp yarns are aligned as much as possible" (see Voith's Ex Parte Reexamination Request at p. 4). That is particularly so given that the pictures in your email and in the attached "Claim-Analysis 14939 Seam PressPoint" document that show the yarns are not aligned as much as possible. Given the relevant burden of proof and that Voith represents that it has various samples of Albany's products, this further demonstrates to Albany that its products do not infringe.

Albany also does not view the statement that "Your claim construction arguments, to the extent they can be understood" as productive to the parties' discussion. For example, the attached Voith "US8353252_SeamPressPoint MWE" document explains on slide 4 that "'Substantially' interpreted as term of approximation unless disclaimed or narrowed in prosecution history" and notes on slide 5 that "An essential feature of the invention is that these weft threads are brought into alignment with themselves as precisely as possible. In order to highlight this, the reinforcing term 'substantially aligned' was chosen"; and that "Substantially aligned $\approx$ as aligned as possible." As Albany has explained, in the *ex parte* proceeding (which is part of the prosecution history), Voith took a position narrowing the interpretation of "substantially aligned," which is binding on Voith. Notably, the attached "Claim-Analysis 14939 Seam PressPoint" document does not address this.

Regarding validity, the previous Patent Office proceeding for the '252 patent was *ex parte*. Albany continues to believe Voith's patents will be found invalid in any contested proceedings. Albany will continue to pursue its *inter partes* challenges while the parties hopefully continue their discussions. Albany refers Voith to the prior art and analyses in the *inter partes* challenges.

With respect to the '388 patent, Albany believes it is invalid. Albany offered for sale, made, and sold Seam PressPoint III products before the '388 patent's August 13, 2015 effective filing date. See 35 U.S.C.

102(a)(1). Furthermore, we have found ample prior art in the form of printed publications to render this patent unpatentable in an *inter partes* challenge. The '388 patent's claims are therefore invalid for multiple reasons. Please let us know if you would like to have a call to discuss or have further ideas about advancing the parties towards a resolution.

Best,
Jenn

Jennifer L. O'Connell

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From: O'Connell, Jenn

Sent: Wednesday, July 16, 2025 1:49 PM

To: Keck, Hans-Georg <hans-georg.keck@voith.com>

Cc: Stein, Merle <merle.stein@albint.com>; Levine, Mark <Mark.Levine@albint.com>; Gaug, Joseph <Joseph.Gaug@albint.com>; Grace Kim <gkim@fr.com>; John Lane <jlane@fr.com>; kane@fr.com; Larsen, Chuck <clarsen@mwe.com>; Bassmann, Martin <Martin.Bassmann@Voith.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Klaschka, Susanne <Susanne.Klaschka@voith.com>

Subject: RE: [EXT] RE: US8,353,252 - Seam PressPoint - Privileged & Confidential Attorney-Client Communication

Dear Hans,

Albany will respond as soon as we are ready, our team has continued to reply timely throughout this process. We note that it took Voith three months to respond to us.

Best,
Jenn

Jennifer L. O'Connell

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From: Keck, Hans-Georg <hans-georg.keck@voith.com>

Sent: Friday, July 4, 2025 11:39 AM

To: O'Connell, Jenn <jenn.oconnell@albint.com>

Cc: Stein, Merle <merle.stein@albint.com>; Levine, Mark <Mark.Levine@albint.com>; Gaug, Joseph <Joseph.Gaug@albint.com>; Grace Kim <gkim@fr.com>; John Lane <jlane@fr.com>; kane@fr.com; Larsen, Chuck <clarsen@mwe.com>; Bassmann, Martin <Martin.Bassmann@Voith.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Klaschka, Susanne <Susanne.Klaschka@voith.com>

Subject: AW: [EXT] RE: US8,353,252 - Seam PressPoint - Privileged & Confidential Attorney-Client Communication

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Dear Jenn,
Thanks for your message and update.
We would appreciate hearing from you by July 17, 2025.

Best regards,
Hans

Mit freundlichen Grüßen / Best Regards

Hans-Georg Keck

Voith Group

Head Corporate Intellectual Property - zp
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Aufsichtsratsvorsitzender der J.M. Voith Management SE:
Dr. Toralf Haag
Vorstand der J.M. Voith Management SE:
Andreas Endters, Dr. Stefan Kampmann, Cornelius Weitzmann

Von: O'Connell, Jenn <jenn.oconnell@albint.com>

Gesendet: Donnerstag, 3. Juli 2025 20:27

An: Keck, Hans-Georg <hans-georg.keck@voith.com>; Larsen, Chuck <clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Bassmann, Martin <Martin.Bassmann@Voith.com>; Klaschka, Susanne <Susanne.Klaschka@voith.com>

Cc: Stein, Merle <merle.stein@albint.com>; Levine, Mark <Mark.Levine@albint.com>; Gaug, Joseph <Joseph.Gaug@albint.com>; Grace Kim <gkim@fr.com>; John Lane <jlane@fr.com>; kane@fr.com

Betreff: RE: [EXT] RE: US8,353,252 - Seam PressPoint - Privileged & Confidential Attorney-Client Communication

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Dear Hans:

Thank you for your email below. While Albany disagrees with your positions, we are still considering Voith's response. We need additional time to respond in view of the summer holidays and the July 4th holiday in the US this week.

Best,
Jenn

Jennifer L. O'Connell

Assistant General Counsel, Director of Intellectual Property

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From: Keck, Hans-Georg <hans-georg.keck@voith.com>

Sent: Friday, June 6, 2025 6:35 AM

To: O'Connell, Jenn <jenn.oconnell@albint.com>

Cc: Larsen, Chuck <clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle <merle.stein@albint.com>; Hansen, Rob <Rob.Hansen@albint.com>; ark.Levine@albint.com; Stankus, Sara <sara.stankus@albint.com>; Gaug, Joseph <Joseph.Gaug@albint.com>; Bassmann, Martin <Martin.Bassmann@Voith.com>; Klaschka, Susanne <Susanne.Klaschka@voith.com>; Grace Kim <gkim@fr.com>; John Lane <jlane@fr.com>; kane@fr.com

Subject: WG: [EXT] RE: US8,353,252 - Seam PressPoint - Privileged & Confidential Attorney-Client Communication

CAUTION: This email originated from outside of the company. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Jenn,

In response to your email of 14 March, we have reviewed our position further and remain of the opinion that the Seam PressPoint products are using our US patents '252 and '388. We have received two new samples: one Seam PressPoint II and one Seam PressPoint III from Cedar Springs PM3. Both samples are full-length and woven in full width, with interconnected fabric ends. Both samples exhibit the "substantial alignment" feature of US Patent '252. Additionally, the Seam PressPoint III sample has extra fabric on top of the base fabric. We consider this to be further confirmation that Seam PressPoint products use our patented technology.

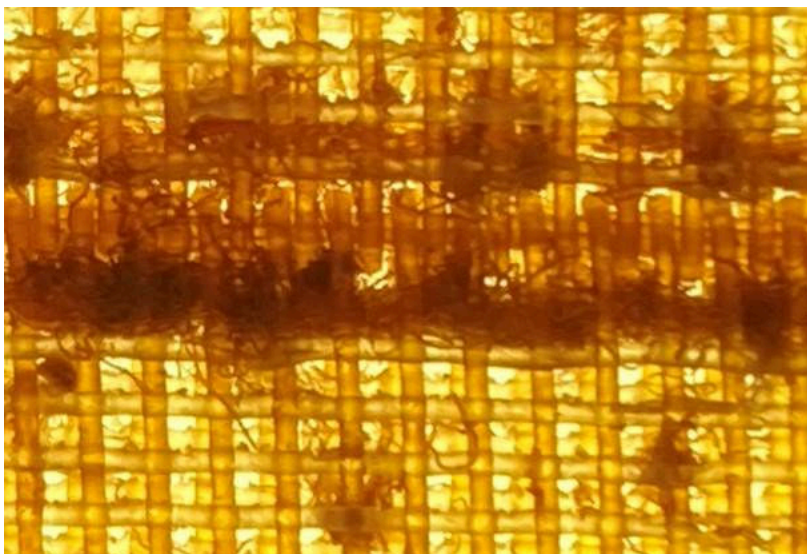
We are not convinced by your assertion that Albany's products do not have the 'substantial alignment' feature. Albany advertises Seam PressPoint products as having "the best" "seamability - [due to] straighter and evenly spaced loops", a product feature that requires the "substantial alignment" feature claimed in US '252. Your claim construction arguments, to the extent they can be understood, do nothing to obviate the fact that your products rely on such seamability. We also note that US '388 does not require a "substantial alignment" feature, at all, so whatever your claim construction arguments about substantial alignment, they do not apply to that patent. We therefore continue to believe that all Seam PressPoint products use our US Patent No. 252, and that Seam PressPoint III products also use our US Patent No. 388.

Regarding validity, the USPTO already examined and affirmed the '252 patent in light of the prior art and arguments you raised in previous discussions. You have presented no further prior art, nor any prior art or arguments against our US '388, so we have no reason to change our conclusion -- that the patents are valid.

Considering the above, and further considering that Albany has provided no evidence that any of the Voith products practice Albany IP, we see no benefit to adopting the royalty-free license proposal set out in your letter. When the CEOs meet and consider the above, they will surely see what is plainly evident – that Albany should take a license and pay a reasonable royalty to Voith. However, before involving the CEOs, we would like to make sure we fully understand Albany's position. To enable us to do so, please submit comprehensive arguments for our review, or otherwise advise as to other facts that you believe may be relevant.

We look forward to receiving your response, preferably by 3 July at the latest.

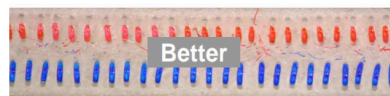
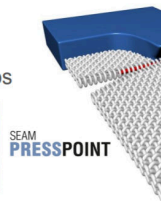
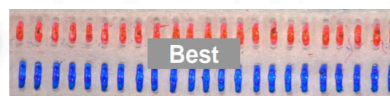
Best regards,
Hans



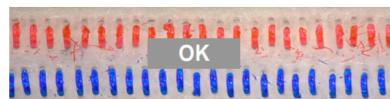
SEAM PRESSPOINT

Benefits:

- Seamability - straighter and equally spaced loops



SEAM
TECH



SEAM
DYNATEX

Von: O'Connell, Jenn <jenn.oconnell@albint.com>

Gesendet: Freitag, 14. März 2025 20:04

An: Keck, Hans-Georg <hans-georg.keck@voith.com>

Cc: Larsen, Chuck <Clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle <merle.stein@albint.com>; Hansen, Rob <Rob.Hansen@albint.com>; Levine, Mark <Mark.Levine@albint.com>; Stankus, Sara <sara.stankus@albint.com>; Gaug, Joseph <Joseph.Gaug@albint.com>; Bassmann, Martin <Martin.Bassmann@Voith.com>; Klaschka, Susanne <Susanne.Klaschka@voith.com>; Grace Kim <gkim@fr.com>; John Lane <JLane@fr.com>; kane@fr.com

Betreff: RE: [EXT] RE: US8,353,252 - Seam PressPoint

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Dear Hans,

Albany's edits to the term sheet are attached.

As reflected in the edits, Albany views Voith's proposal as unreasonable and unworkable.

By way of example, Albany believes a running royalty structure is unworkable because it requires the parties to agree that products "practice" each other's patents, and it is unlikely the parties will agree on that. Underscoring that point, Albany strongly believes its Seam PressPoint products do not practice Voith's US 252 and 388 patents, but Voith's proposal seems to assume they do.

Related, Albany believes the claims of the US 252 and 388 patents are invalid and is prepared if necessary to file post-grant challenges for the US patents.

Albany also does not agree with Voith's characterization of the *ex parte* reexamination. As was discussed on the parties' call, in that proceeding, Voith took a position narrowing the claim term "substantially aligned" that would be binding on Voith in claim construction in a litigation. Moreover, that proceeding was *ex parte*, between Voith and the Patent Office only, whereas Albany may file inter partes challenges where it would be involved at each stage of the proceedings.

As to Albany's proposed license to Voith, as shown in the revised term sheet, Albany does not agree at this time to license all patents and all claims in the EP 768 patent family.

Additionally, Albany believes based on publicly available information that Voith is supplying customers with paper making machine fabrics that practice the claims in the US 738 family of patents and has thus included that family of patents in the term sheet. It is important that the parties address these patents now in the context of cross licensing their patents, so that this does not escalate into a larger dispute.

We appreciate your consideration of the attached terms.

Best,
Jenn

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From: O'Connell, Jenn

Sent: Friday, March 7, 2025 3:46 PM

To: Keck, Hans-Georg <hans-georg.keck@voith.com>

Cc: Larsen, Chuck <Clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle

<merle.stein@albint.com>; Hansen, Rob <Rob.Hansen@albint.com>; Levine, Mark <Mark.Levine@albint.com>; Stankus, Sara <sara.stankus@albint.com>; Gaug, Joseph <Joseph.Gaug@albint.com>; Bassmann, Martin <Martin.Bassmann@Voith.com>; Klaschka, Susanne <Susanne.Klaschka@voith.com>; Grace Kim <gkim@fr.com>; John Lane <JLane@fr.com>; kane@fr.com

Subject: RE: [EXT] RE: US8,353,252 - Seam PressPoint

Dear Hans,

Albany will have our response to you by the end of next week, March 14, 2025, if not sooner. We also look forward to an amicable and timely resolution.

Thank you,
Jenn

JENNIFER L. O'CONNELL

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From: Keck, Hans-Georg <hans-georg.keck@voith.com>

Sent: Thursday, February 27, 2025 2:23 AM

To: O'Connell, Jenn <jenn.oconnell@albint.com>

Cc: Larsen, Chuck <Clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle <merle.stein@albint.com>; Hansen, Rob <Rob.Hansen@albint.com>; Levine, Mark <Mark.Levine@albint.com>; Stankus, Sara <sara.stankus@albint.com>; Bassmann, Martin <Martin.Bassmann@Voith.com>; Klaschka, Susanne <Susanne.Klaschka@voith.com>; Grace Kim <gkim@fr.com>; John Lane <JLane@fr.com>; kane@fr.com

Subject: WG: [EXT] RE: US8,353,252 - Seam PressPoint

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Jenn,

Thanks for your message and update. We would appreciate hearing from you by the end of next week (i.e., COB on 7th March) – that will have given nearly a full month for the response.

As for the process, the 90 day period of negotiation that is required before invoking the CEO escalation (Section 1 of the Agreement) ended long ago.

Even if we restart the clock from 14 January 2025 (the day of our conference call where your new team first appeared), the 90 day period would expire on 14 April 2025. Our view is that we need to have reached an amicable solution at least by then, or we consider triggering the CEO escalation.

Best regards,
Hans

Mit freundlichen Grüßen / Best Regards

Hans-Georg Keck

Voith Group

Head Corporate Intellectual Property - zp
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From: O'Connell, Jenn <jenn.oconnell@albint.com>
Sent: Monday, February 24, 2025 12:40 PM
To: Keck, Hans-Georg <hans-georg.keck@voith.com>
Cc: Larsen, Chuck <Clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle <merle.stein@albint.com>; Hansen, Rob <Rob.Hansen@albint.com>; Levine, Mark <Mark.Levine@albint.com>; Stankus, Sara <sara.stankus@albint.com>; Bassmann, Martin <Martin.Bassmann@Voith.com>; Klaschka, Susanne <Susanne.Klaschka@voith.com>; Grace Kim <gkim@fr.com>; John Lane <JLane@fr.com>; kane@fr.com
Subject: RE: [EXT] RE: US8,353,252 - Seam PressPoint

[External Email]

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Dear Hans,

I hope this email finds you well. We are still reviewing the proposed term sheet and will not be able to respond by your suggested date of February 26th. We will respond as soon as we can.

Thank you,
Jenn

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From: Keck, Hans-Georg <hans-georg.keck@voith.com>
Sent: Sunday, February 9, 2025 12:33 PM
To: O'Connell, Jenn <jenn.oconnell@albint.com>
Cc: Larsen, Chuck <Clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle <merle.stein@albint.com>; Hansen, Rob <Rob.Hansen@albint.com>; Levine, Mark <Mark.Levine@albint.com>; Stankus, Sara <sara.stankus@albint.com>; Bassmann, Martin <Martin.Bassmann@Voith.com>; Klaschka, Susanne <Susanne.Klaschka@voith.com>; Grace Kim <gkim@fr.com>; John Lane <JLane@fr.com>; kane@fr.com
Subject: AW: [EXT] RE: US8,353,252 - Seam PressPoint

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Dear Jenn,

Further to our meeting held 14 January 2025, attached is a proposed term sheet for a cross license. Please review and advise us no later than close of business **26 February 2025** if these terms are suitable to form the basis of an agreement, or if you would have suggested adjustments.

As indicated, our *Agreement On The Settlement of Intellectual Property Conflicts* (dated November 5, 2005) directs that we must endeavor to resolve our conflict amicably (Section 1). If that cannot be done, then the dispute should be referred to our respective CEOs as a next step, prior to initiating other actions. Voith's CEO is prepared to meet with Albany's CEO. But given the ample evidence in the market of the Seam Press point product line, and the USPTO's findings in the reexamination, we continue to maintain that escalation step to be unnecessary. But please advise if you would rather invoke it.

Best regards,
Hans

Mit freundlichen Grüßen / Best Regards

Hans-Georg Keck

Voith Group

Head Corporate Intellectual Property - zp
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Reg. Gericht Ulm, HRB 737231
Sitz der Gesellschaft: Heidenheim
Aufsichtsratsvorsitzender der J.M. Voith Management SE:
Dr. Toralf Haag
Vorstand der J.M. Voith Management SE:
Andreas Endters, Dr. Stefan Kampmann, Cornelius Weitzmann

Von: Keck, Hans-Georg <hans-georg.keck@voith.com>

Gesendet: Donnerstag, 9. Januar 2025 23:30

An: O'Connell, Jenn <jenn.oconnell@albint.com>

Cc: Larsen, Chuck <Clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle <merle.stein@albint.com>; Hansen, Rob <Rob.Hansen@albint.com>; Levine, Mark <Mark.Levine@albint.com>; Stankus, Sara <sara.stankus@albint.com>; Bassmann, Martin <Martin.Bassmann@Voith.com>; Klaschka, Susanne <Susanne.Klaschka@voith.com>; Grace Kim <gkim@fr.com>; John Lane <JLane@fr.com>; kane@fr.com

Betreff: Re: [EXT] RE: US8,353,252 - Seam PressPoint

Dear Jenn,

Thank you for sending the draft NDA. It appears to be more complex than a typical NDA. In any event, we have considered it internally and also in view of the historical relationship between Albany and Voith. As you have already discerned, the historical dealings between the two companies have not required an NDA, and Voith sees no need for exchange of confidential information at this point, so we are not seeing any particular need for an NDA, at the moment anyway. We would prefer to hold the meeting next week without an NDA, as planned, and then reevaluate afterward if it becomes necessary.

Please let me know if you agree.

Best regards,
Hans

From: O'Connell, Jenn <jenn.oconnell@albint.com>

Sent: Wednesday, January 8, 2025 7:57 PM

To: Keck, Hans-Georg <hans-georg.keck@voith.com>

Cc: Larsen, Chuck <Clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle <merle.stein@albint.com>; Hansen, Rob <Rob.Hansen@albint.com>; Levine, Mark <Mark.Levine@albint.com>; Stankus, Sara <sara.stankus@albint.com>; Bassmann, Martin <Martin.Bassmann@Voith.com>; Klaschka, Susanne <Susanne.Klaschka@voith.com>; Grace Kim <gkim@fr.com>; John Lane <JLane@fr.com>; kane@fr.com <kane@fr.com>

Subject: RE: [EXT] RE: US8,353,252 - Seam PressPoint

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Dear Hans,

Albany believes that both Voith and Albany would benefit from having a confidentiality agreement in place before next week's call so that the parties can speak and share information more freely. A draft agreement is attached for your review. Please let us know Voith's thoughts on the draft.

Thank you,

Jenn

Jennifer L. O'Connell

Assistant General Counsel, Director of Intellectual Property

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From: O'Connell, Jenn

Sent: Monday, January 6, 2025 9:08 AM

To: Keck, Hans-Georg <hans-georg.keck@voith.com>

Cc: Larsen, Chuck <Clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle <merle.stein@albint.com>; Hansen, Rob <Rob.Hansen@albint.com>; Levine, Mark <Mark.Levine@albint.com>; Stankus, Sara <sara.stankus@albint.com>; Bassmann, Martin <Martin.Bassmann@Voith.com>; Klaschka, Susanne <Susanne.Klaschka@voith.com>; Grace Kim <gkim@fr.com>; John Lane <JLane@fr.com>; kane@fr.com

Subject: RE: [EXT] RE: US8,353,252 - Seam PressPoint

Thank you Hans. I can confirm that I received the invitation. I look forward to meeting you in a few weeks.

Best,
Jenn

Jennifer L. O'Connell

Assistant General Counsel, Director of Intellectual Property

Office: +1 603.330.2351 | Mobile: +1 516.286.7773

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From: Keck, Hans-Georg <hans-georg.keck@voith.com>

Sent: Monday, January 6, 2025 9:00 AM

To: O'Connell, Jenn <jenn.oconnell@albint.com>

Cc: Larsen, Chuck <Clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle <merle.stein@albint.com>; Hansen, Rob <Rob.Hansen@albint.com>; Levine, Mark <Mark.Levine@albint.com>; Stankus, Sara <sara.stankus@albint.com>; Bassmann, Martin <Martin.Bassmann@Voith.com>; Klaschka, Susanne <Susanne.Klaschka@voith.com>; Grace Kim <gkim@fr.com>; John Lane <JLane@fr.com>; kane@fr.com

Subject: AW: [EXT] RE: US8,353,252 - Seam PressPoint

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Dear Jenn,
update sent, including your external lawyers from F&R. Please let me know if someone is missing.

Best regards,
Hans

Mit freundlichen Grüßen / Best Regards

Hans-Georg Keck

Voith Group

Head Corporate Intellectual Property - zp
Innovation & Technology

J.M. Voith SE & Co. KG
St. Pöltener Straße 43
89522 Heidenheim, Germany

Phone +49 7321 37 7362
Fax +49 7321 37 7003
Mobile +49 152 25445640

hans-georg.keck@voith.com
www.voith.com

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Sitz der Gesellschaft: Heidenheim
Persönlich haftende Gesellschafterin: J.M. Voith Management SE
Reg. Gericht Ulm, HRB 737231
Sitz der Gesellschaft: Heidenheim
Aufsichtsratsvorsitzender der J.M. Voith Management SE:
Dr. Toralf Haag
Vorstand der J.M. Voith Management SE:
Andreas Endters, Dr. Stefan Kampmann, Cornelius Weitzmann

Von: O'Connell, Jenn <jenn.oconnell@albint.com>

Gesendet: Freitag, 3. Januar 2025 16:46

An: Keck, Hans-Georg <hans-georg.keck@voith.com>

Cc: Larsen, Chuck <Clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle <merle.stein@albint.com>; Hansen, Rob <Rob.Hansen@albint.com>; Levine, Mark <Mark.Levine@albint.com>; Stankus, Sara <sara.stankus@albint.com>; Bassmann, Martin <Martin.Bassmann@Voith.com>; Klaschka, Susanne <Susanne.Klaschka@voith.com>; Grace Kim <gkim@fr.com>; John Lane <JLane@fr.com>; kane@fr.com

Betreff: RE: [EXT] RE: US8,353,252 - Seam PressPoint

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Dear Hans,

Yes, I have been meaning to follow up with you. I do not believe our team received the invitation. Please recirculate the invite to the entire group. We will have the following attendees:

Rob Hansen – rob.hansen@albint.com - Chief Technology Officer and Sr VP of Corporate R&D
Mark Levine - mark.levine@albint.com – SR VP R&D Machine Clothing
Sara Stankus – sara.stankus@albint.com - Assistant General Counsel
Jenn O’Connell (myself) – jenn.oconnell@albint.com – Assistant General Counsel, Director of IP
Grace Kim – gkim@fr.com – Principal, Fish & Richardson
John Lane – jlane@fr.com – Principal, Fish & Richardson
Michael Kane – kane@fr.com – Principal, Fish & Richardson

Let me know if you need anything else.

Happy New Year,
Jenn

Jennifer L. O’Connell

Assistant General Counsel, Director of Intellectual Property

Office: +1 603.330.2351 | Mobile: +1 516.286.7773

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From: Keck, Hans-Georg <hans-georg.keck@voith.com>
Sent: Friday, January 3, 2025 7:54 AM
To: O'Connell, Jenn <jenn.oconnell@albint.com>
Cc: Larsen, Chuck <Clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle <merle.stein@albint.com>; Hansen, Rob <Rob.Hansen@albint.com>; Levine, Mark <Mark.Levine@albint.com>; Stankus, Sara <sara.stankus@albint.com>; Bassmann, Martin <Martin.Bassmann@Voith.com>; Klaschka, Susanne <Susanne.Klaschka@voith.com>
Subject: AW: [EXT] RE: US8,353,252 - Seam PressPoint

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Dear Jenn,
happy New Year! I hope you had a great holiday season.
With regard to the upcoming meeting on January 14, could you please confirm the names of the people who will be attending from Albany's side, as I cannot see who has accepted my invitation.

Thank you very much in advance.

Best regards,
Hans

Mit freundlichen Grüßen / Best Regards

Hans-Georg Keck

Voith Group

Head Corporate Intellectual Property - zp
Innovation & Technology

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St. Pöltener Straße 43
89522 Heidenheim, Germany

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Fax +49 7321 37 7003
Mobile +49 152 25445640

hans-georg.keck@voith.com
www.voith.com

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Reg. Gericht Ulm, HRB 737231
Sitz der Gesellschaft: Heidenheim
Aufsichtsratsvorsitzender der J.M. Voith Management SE:
Dr. Toralf Haag
Vorstand der J.M. Voith Management SE:
Andreas Endters, Dr. Stefan Kampmann, Cornelius Weitzmann

Von: O'Connell, Jenn <jenn.oconnell@albint.com>

Gesendet: Donnerstag, 19. Dezember 2024 18:31

An: Keck, Hans-Georg <hans-georg.keck@voith.com>

Cc: Larsen, Chuck <Clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle <merle.stein@albint.com>; Hansen, Rob <Rob.Hansen@albint.com>; Levine, Mark <Mark.Levine@albint.com>; Stankus, Sara <sara.stankus@albint.com>; Bassmann, Martin <Martin.Bassmann@Voith.com>; Klaschka, Susanne <Susanne.Klaschka@voith.com>

Betreff: RE: [EXT] RE: US8,353,252 - Seam PressPoint

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Thank you Hans.

Jennifer L. O'Connell

Assistant General Counsel, Director of Intellectual Property

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From: Keck, Hans-Georg <hans-georg.keck@voith.com>

Sent: Thursday, December 19, 2024 12:26 PM

To: O'Connell, Jenn <jenn.oconnell@albint.com>

Cc: Larsen, Chuck <Clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle <merle.stein@albint.com>; Hansen, Rob <Rob.Hansen@albint.com>; Levine, Mark <Mark.Levine@albint.com>; Stankus, Sara <sara.stankus@albint.com>; Bassmann, Martin <Martin.Bassmann@Voith.com>; Klaschka, Susanne <Susanne.Klaschka@voith.com>

Subject: AW: [EXT] RE: US8,353,252 - Seam PressPoint

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Dear Jenn,

The following people from Voith will be attending:

- Martin Bassmann, CEO Fabrics & Rolls Division
- Anne Klaschka, Global Product Management
- Rainer Schmachtel, IP Voith
- Chuck Larson, Mc. Dermott
- myself

I wish you a pleasant holiday season.

Best regards,
Hans

Mit freundlichen Grüßen / Best Regards

Hans-Georg Keck

Voith Group

Head Corporate Intellectual Property - zp
Innovation & Technology

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89522 Heidenheim, Germany

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Mobile +49 152 25445640

hans-georg.keck@voith.com
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Aufsichtsratsvorsitzender der J.M. Voith Management SE:
Dr. Toralf Haag
Vorstand der J.M. Voith Management SE:
Andreas Endters, Dr. Stefan Kampmann, Cornelius Weitzmann

Von: O'Connell, Jenn <jenn.oconnell@albint.com>

Gesendet: Mittwoch, 18. Dezember 2024 21:04

An: Keck, Hans-Georg <hans-georg.keck@voith.com>

Cc: Larsen, Chuck <Clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle <merle.stein@albint.com>; Hansen, Rob <Rob.Hansen@albint.com>; Levine, Mark <Mark.Levine@albint.com>; Stankus, Sara <sara.stankus@albint.com>

Betreff: RE: [EXT] RE: US8,353,252 - Seam PressPoint

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Hello Hans-Georg,

Yes, apologies for my delay. I have added my colleagues in cc and I will forward your invitation to our outside counsel as well.

Thank you,
Jenn

Jennifer L. O'Connell

Assistant General Counsel, Director of Intellectual Property

Office: +1 603.330.2351 | Mobile: +1 516.286.7773

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From: Keck, Hans-Georg <hans-georg.keck@voith.com>

Sent: Wednesday, December 18, 2024 1:04 PM

To: O'Connell, Jenn <jenn.oconnell@albint.com>

Cc: Larsen, Chuck <Clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle <merle.stein@albint.com>

Subject: Re: [EXT] RE: US8,353,252 - Seam PressPoint

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Dear Jenn,

I am not sure if my last email reached you.

Could you please let me know who from Albany will be attending the meeting so I can include them in the invite. Thank you in advance.

Best Regards,
Hans

From: Keck, Hans-Georg <hans-georg.keck@voith.com>

Sent: Sunday, December 15, 2024 8:49 PM

To: O'Connell, Jenn <jenn.oconnell@albint.com>

Cc: Larsen, Chuck <Clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle <merle.stein@albint.com>

Subject: AW: [EXT] RE: US8,353,252 - Seam PressPoint

Dear Jenn,

thank you.

Could you please let me know which of the Albany team will be attending the meeting? Please also provide me with the email addresses.

Thank you in advance and have a nice Sunday.

Best regards,
Hans

Mit freundlichen Grüßen / Best Regards

Hans-Georg Keck

Voith Group

Head Corporate Intellectual Property - zp
Innovation & Technology

J.M. Voith SE & Co. KG
St. Pöltener Straße 43
89522 Heidenheim, Germany

Phone +49 7321 37 7362
Fax +49 7321 37 7003
Mobile +49 152 25445640

hans-georg.keck@voith.com
www.voith.com

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Reg. Gericht Ulm, HRB 737231
Sitz der Gesellschaft: Heidenheim
Aufsichtsratsvorsitzender der J.M. Voith Management SE:
Dr. Toralf Haag
Vorstand der J.M. Voith Management SE:
Andreas Endters, Dr. Stefan Kampmann, Cornelius Weitzmann

Von: O'Connell, Jenn <jenn.oconnell@albint.com>

Gesendet: Freitag, 13. Dezember 2024 14:41

An: Keck, Hans-Georg <hans-georg.keck@voith.com>

Cc: Larsen, Chuck <Clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle <merle.stein@albint.com>

Betreff: RE: [EXT] RE: US8,353,252 - Seam PressPoint

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Yes, Hans. 4:00 pm CET works for our team as well.

Best,
Jenn

Jennifer L. O'Connell

Assistant General Counsel, Director of Intellectual Property

Office: +1 603.330.2351 | Mobile: +1 516.286.7773

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From: Keck, Hans-Georg <hans-georg.keck@voith.com>

Sent: Friday, December 13, 2024 12:26 AM

To: O'Connell, Jenn <jenn.oconnell@albint.com>

Cc: Larsen, Chuck <Clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle <merle.stein@albint.com>

Subject: Re: [EXT] RE: US8,353,252 - Seam PressPoint

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Dear Jenn,

valid point. I had 4:00pm (CET) in mind but forgot to mention it. Does that work for you as well?

Best,
Hans

From: O'Connell, Jenn <jenn.oconnell@albint.com>
Sent: Thursday, December 12, 2024 8:00:37 PM
To: Keck, Hans-Georg <hans-georg.keck@voith.com>
Cc: Larsen, Chuck <Clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle <merle.stein@albint.com>
Subject: RE: [EXT] RE: US8,353,252 - Seam PressPoint

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Dear Hans,

Let's proceed with 14 January 2025 at 4:00pm ET, let us know if you were referring to a different time zone.

Happy holidays!

Best,
Jenn

Jennifer L. O'Connell

Assistant General Counsel, Director of Intellectual Property

Office: +1 603.330.2351 | Mobile: +1 516.286.7773

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From: Keck, Hans-Georg <hans-georg.keck@voith.com>
Sent: Thursday, December 12, 2024 12:31 PM
To: O'Connell, Jenn <jenn.oconnell@albint.com>
Cc: Larsen, Chuck <Clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle <merle.stein@albint.com>
Subject: AW: [EXT] RE: US8,353,252 - Seam PressPoint

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Dear Jen,
I hope you are well too.

The Voith team will be available for the video call on 14 January at 4:00 p.m., alternatively 15 January at the same time would also be possible.
If this date suits the Albany team, I will send an invitation.

I wish you and yours a Merry Christmas and a relaxing holiday season.
Best regards,
Hans

Mit freundlichen Grüßen / Best Regards

Hans-Georg Keck

Voith Group

Head Corporate Intellectual Property - zp
Innovation & Technology

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St. Pöltener Straße 43
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Aufsichtsratsvorsitzender der J.M. Voith Management SE:
Dr. Toralf Haag
Vorstand der J.M. Voith Management SE:
Andreas Endters, Dr. Stefan Kampmann, Cornelius Weitzmann

Von: O'Connell, Jenn <jenn.oconnell@albint.com>

Gesendet: Montag, 9. Dezember 2024 20:59

An: Keck, Hans-Georg <hans-georg.keck@voith.com>

Cc: Larsen, Chuck <Clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle <merle.stein@albint.com>

Betreff: RE: [EXT] RE: US8,353,252 - Seam PressPoint

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Dear Hans,

I hope you are well. I am a bit surprised that you are classifying the references Albany previously provided as “irrelevant.” As you know, you stated, on record at the USPTO, that the references presented a substantial new question of patentability of U.S. Patent No. 8,353,252. Thus, your patent attorneys and you acknowledged and asserted that the references were relevant.

We intend to honor our existing agreement and resume discussions. We are available for discussions via video from January 13th to January 16th. We are also available the following week, January 20th, 21st and 22nd if scheduling conflicts arise.

Let us know your preferred time.

I wish you and yours a lovely holiday season.

Best regards,
Jenn

Jennifer L. O'Connell

Assistant General Counsel, Director of Intellectual Property

Office: +1 603.330.2351 | Mobile: +1 516.286.7773

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From: Keck, Hans-Georg <hans-georg.keck@voith.com>

Sent: Wednesday, November 27, 2024 12:54 AM

To: O'Connell, Jenn <jenn.oconnell@albint.com>

Cc: Larsen, Chuck <Clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle <merle.stein@albint.com>

Subject: AW: [EXT] RE: US8,353,252 - Seam PressPoint

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Dear Jenn,

thank you for your email and your engagement in this matter, which is of great urgency to Voith. As your file will confirm, we first raised the license issue to Albany in our letter of 18 July 2023 and made our best effort thereafter to amicably resolve the conflict. Albany's response was disappointing, as it appeared to sidetrack the business negotiation process by putting forward irrelevant prior art (most of which had already been considered by the USPTO during prosecution) and “non-infringement” arguments that were, frankly, not credible. Indeed, after reviewing the prior art and Albany's analyses, it became even more clear that a license would be warranted. But after four months and

multiple meetings between the parties (where we made clear that Albany's positions had no merit), no solution was reached.

As I indicated below, the USPTO has since confirmed our view of the prior art. It is now time to resolve the business arrangement without further delay.

I appreciate that you are new to this matter, so we are willing to grant an extension for your response in order to accommodate your need to get organized, but only **until 9 December 2024**. By then, we insist that Albany propose blocks of availability for a call between the Voith and Albany teams, to be held no later than **17 January**, so that meaningful license negotiations can finally occur. If, by then, no meeting has been scheduled, we will directly escalate to the next step provided in the Agreement (Section 1) and refer the matter to the Voith and Albany CEOs.

We look forward to your proposal for negotiation dates.

Best regards,
Hans

Hans-Georg Keck

Voith Group

Head Corporate Intellectual Property - zp
Innovation & Technology

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Dr. Toralf Haag
Vorstand der J.M. Voith Management SE:
Andreas Endters, Dr. Stefan Kampmann, Cornelius Weitzmann

Von: O'Connell, Jenn <jenn.oconnell@albint.com>

Gesendet: Freitag, 22. November 2024 18:47

An: Keck, Hans-Georg <hans-georg.keck@voith.com>

Cc: Larsen, Chuck <Clarsen@mwe.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Stein, Merle <merle.stein@albint.com>

Betreff: [EXT] RE: US8,353,252 - Seam PressPoint

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Dear Hans,

I am following up regarding your November 8 email to Michael Moriarty. In case you were not aware, Michael has retired. I recently joined the legal team at Albany International as Assistant General Counsel, Director of Intellectual Property after spending many years in private practice. Our machine clothing business also has a new president, Merle Stein. As you can imagine, Merle and I are getting up to speed on this issue and still gathering and reviewing the information. We also need time to confer between us once I fully understand the issues. That being said, I want to confirm the receipt of your email and ask for your patience while we get organized. We will contact you shortly to further discuss. Thank you for your understanding.

Best regards,
Jenn

Jennifer L. O'Connell

Assistant General Counsel, Director of Intellectual Property



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From: O'Connell, Jenn

Sent: Friday, November 8, 2024 12:29 PM

To: Keck, Hans-Georg <hans-georg.keck@voith.com>

Cc: Hansen, Rob <Rob.Hansen@albint.com>; Gaug, Joseph <Joseph.Gaug@albint.com>; Moriarty, Michael <Michael.Moriarty@albint.com>; Larsen, Chuck <Clarsen@mwe.com>; Rainer.Schmachtel@Voith.com

Subject: RE: US8,353,252 - Seam PressPoint

Dear Hans,

Thank you for your email below. We will be in touch.

Best,
Jenn

Jennifer L. O'Connell

Assistant General Counsel, Director of Intellectual Property

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From: Keck, Hans-Georg <hans-georg.keck@voith.com>

Sent: Friday, November 8, 2024 11:06 AM

To: Moriarty, Michael <Michael.Moriarty@albint.com>

Cc: Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Hansen, Rob <Rob.Hansen@albint.com>; Larsen, Chuck <Clarsen@mwe.com>

Subject: AW: US8,353,252 - Seam PressPoint

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Dear Michael,

Further to our conversations in 2023 regarding US Patent No. 8,353,252 (the “252 patent”), I am following up on our request that Albany enter into a reasonable license arrangement with Voith for the usage of this patent.

We have carefully considered your assessment of the patent’s validity in view of the prior art you provided, including your written analysis in your letter of October 31, 2023 (and related discussions). As you may recall, we disagreed with your analysis of the prior art and its application to the ‘252 patent. We found it necessary and desirable, in order to protect our legal rights in the ‘252 patent, to present your position to the USPTO and have it provide an independent evaluation of your arguments. Accordingly, on January 24, 2024, we filed a request for re-examination (application no. 90/019,395) with the USPTO to consider the patent in view of the prior art and your written analysis (redacted to remove your letter head and company address/signatory).

That process has recently been completed -- attached hereto is a reexamination certificate from the USPTO confirming that the claims are valid.

Voith maintains that the ‘252 patent covers the Albany Seam PressPoint process and, considering that the patent is now confirmed to be valid, we respectfully request to meet and work out a reasonable license arrangement. The agenda for this meeting must include, among other things, the determination of appropriate royalty rates and other relevant economic terms.

I note that the terms of our Agreement On The Settlement of Intellectual Property Conflicts (dated November 5, 2005, attached) specify that we should use our best efforts to settle our intellectual property conflicts amicably (Section 1). If that cannot be done, then the dispute should be referred to our respective CEOs as a next step,

prior to initiating other actions. In view of the updated findings of the USPTO, we would consider escalation in that manner to be unnecessary and trust that a reasonable arrangement can be worked out. But please advise if you would rather invoke that escalation process and we will accommodate.

Please respond by **22 November, 2024** with your soonest availability to reconvene and work out a proper license arrangement.

Best regards,
Hans

Mit freundlichen Grüßen / Best Regards

Hans-Georg Keck

Voith Group

Head Corporate Intellectual Property - zp
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Aufsichtsratsvorsitzender der J.M. Voith Management SE:
Dr. Toralf Haag
Vorstand der J.M. Voith Management SE:
Andreas Endters, Dr. Stefan Kampmann, Cornelius Weitzmann

Von: Keck, Hans-Georg

Gesendet: Freitag, 9. Februar 2024 17:25

An: Moriarty, Michael <Michael.Moriarty@albint.com>

Cc: Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>; Hansen, Rob <Rob.Hansen@albint.com>

Betreff: WG: US8,353,252 - Seam PressPoint

Dear Michael,

enclosed please find a copy of the request for Ex-Parte-Reexamination we filed with the U.S. Patent & Trademark Office last week regarding Voith's U.S. Patent No. 8,353,252. The application No. of the request is 90/019,395.

While we appreciate the open dialog in our discussions to date, we also see that both of our teams have reached an impasse with respect to the issues raised by your team regarding the validity of our US'252 patent. Given the complexity of the outstanding technical and legal issues, we believe it unlikely that the CEOs would be best positioned or comfortable trying to resolve the validity questions.

For this reason, and because the situation is of great importance to our company, we believe that a reexamination of our US'252 patent by the USPTO is the appropriate way to resolve the validity issues raised by your team before the CEOs talk to each other.

As you will notice, we included your letter, given that it sets forth a very detailed analysis of your invalidity assertions that the Patent Office should consider.

We believe it is in the interest of both parties to obtain a complete, independent review by the USPTO, leaving no stones unturned.

Our suggestion is that we resume our discussions after the USPTO has issued its initial opinion.

We are open to discuss again by phone/teams in advance on this matter. Please let me know if you have any questions in the meantime.

Best regards
Hans

Mit freundlichen Grüßen / Best Regards

Hans-Georg Keck
Voith Group

Head of Corp. Intellectual Property
Corporate Intellectual Property - zp
Division VP Other

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Aufsichtsratsvorsitzender der J.M. Voith Management SE:
Dr. Toralf Haag
Vorstand der J.M. Voith Management SE:
Andreas Endters, Cornelius Weitzmann

Von: Keck, Hans-Georg

Gesendet: Freitag, 26. Januar 2024 18:35

An: Moriarty, Michael <Michael.Moriarty@albint.com>

Cc: Hansen, Rob <Rob.Hansen@albint.com>; Schmachtel, Rainer <Rainer.Schmachtel@Voith.com>

Betreff: AW: US8,353,252 - Seam PressPoint

Dear Michael,

I hope that you are also doing well. It snowed here just before Christmas, but at the moment it has warmed up again with frequent rainfall - too warm for January.

As you requested, please find attached the slides from the December 11 meeting which support our position on the validity of US Patent 252 in light of the prior art cited by Albany.

Yours sincerely,
Hans

Mit freundlichen Grüßen / Best Regards

Hans-Georg Keck
Voith Group

Head of Corp. Intellectual Property
Corporate Intellectual Property - zp
Division VP Other

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Dr. Toralf Haag
Vorstand der J.M. Voith Management SE:
Andreas Endters, Cornelius Weitzmann

Von: Moriarty, Michael <Michael.Moriarty@albint.com>

Gesendet: Mittwoch, 3. Januar 2024 19:58

An: Keck, Hans-Georg <hans-georg.keck@voith.com>

Cc: Hansen, Rob <Rob.Hansen@albint.com>

Betreff: [EXT] RE: US8,353,252 - Seam PressPoint

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Dear Hans,

I hope that your holidays were good... interesting here in that we have no snow... very, very unusual this time of year.

During our last meeting we requested a copy of your presentation made in response to claims of non-infringement and I thought you had agreed to send it along. Can you send a copy or an equivalent?

Sincerely,

Michael

Michael Moriarty

Vice President - Intellectual Property

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-----Original Appointment-----

From: Keck, Hans-Georg <hans-georg.keck@voith.com>

Sent: Monday, December 4, 2023 2:22 AM

To: Moriarty, Michael; Stankus, Sara; kehrhard@mccarter.com; Hansen, Rob; blemon@McCarter.com; Larsen, Chuck; Augst, Alexander; Schmachtel, Rainer; Klaschka, Susanne

Cc: Eberhardt, Robert

Subject: US8,353,252 - Seam PressPoint

When: Tuesday, December 12, 2023 4:30 PM-5:30 PM (UTC+01:00) Amsterdam, Berlin, Bern, Rome, Stockholm, Vienna.

Where: Microsoft Teams-Besprechung

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