

Redacted (Privileged Attorney-Client
Communication)

From: Tenney, Frederic T. <Frederic.Tenney@howmet.com>
Sent: Thursday, May 29, 2025 11:47 AM
To: Schildkraut, Mark <Mark.Schildkraut@sbdinc.com>
Cc: Suereth, Sarah <Sarah.Suereth@howmet.com>; Craven, Jonathan <Jonathan.Craven@howmet.com>
Subject: RE: SBD-Howmet - Avdel ECO Bolt

Dear Mr. Schildkraut,

I had a chance to review the technical measurements with our team. Specifically, you asked:

In the meantime, we are hoping you can clarify some initial confusion at our end. Specifically, the claim charts attached to your May 15, 2025 letter allege that an axial length of a pull region of the Avdel® ECO Bolt is “11.4mm” and that a diameter of its shank region is “10.1mm.” These values do not correspond to the Avdel® ECO Bolt. Please explain where along the Avdel® ECO Bolt’s shank Howmet measured the diameter to be 10.1 mm. Specially, please also explain where along the Avdel® ECO Bolt’s mandrel Howmet started its measurement of “axial length” of the alleged pull region to yield a 11.4 mm measurement. This will facilitate our investigation.

As shown in Figure 1 of U.S. Patent No. 11,885,358 (reproduced below), the pull region 120 is that portion of the shank 122 (of the mandrel 112) that extends beyond the second sleeve end 106 of the sleeve 102 and has a labeled length of l . The pull region 120 is described, at, e.g., col. 4, lines 17-59, as being “configured to be engaged by an installation tool [236]. . . The pull region 120 can comprise an axial length, l , that is no greater than 4 times a diameter, d_3 , of the shank region 122[.]”

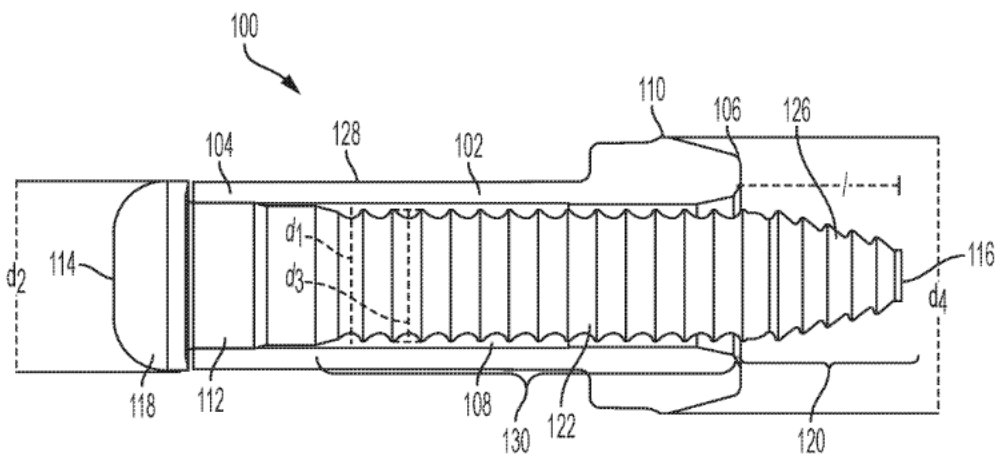


FIG. 1

When we asked our engineers in Europe to measure the product that they were given at the trade show (shown in the following photos)

Photographs taken at the Inter Solar Convention on May 7th, 2025: ¶





Figure 1 - Avbolt Eco



Figure 2 - Avbolt Eco pull groove portion



Figure 4 - Avbolt Eco head marking

our engineers in Texas sent them an image of our BOMTAIL® fastener with the yellow vertical/horizontal lines added so that the engineers would know what to measure. The engineers in Europe then sent that photo (of our BOMTAIL® fastener) to me along with their measurements of the Avdel tradeshow product; I wrongly assumed that the product shown in the photo was yours. Regardless, I have included, as shown above, photos of what we obtained at the tradeshow. In addition, in response to your questioning the dimensions that were measured, I had the folks in Europe remeasure the tradeshow product and they provided the following image/data:

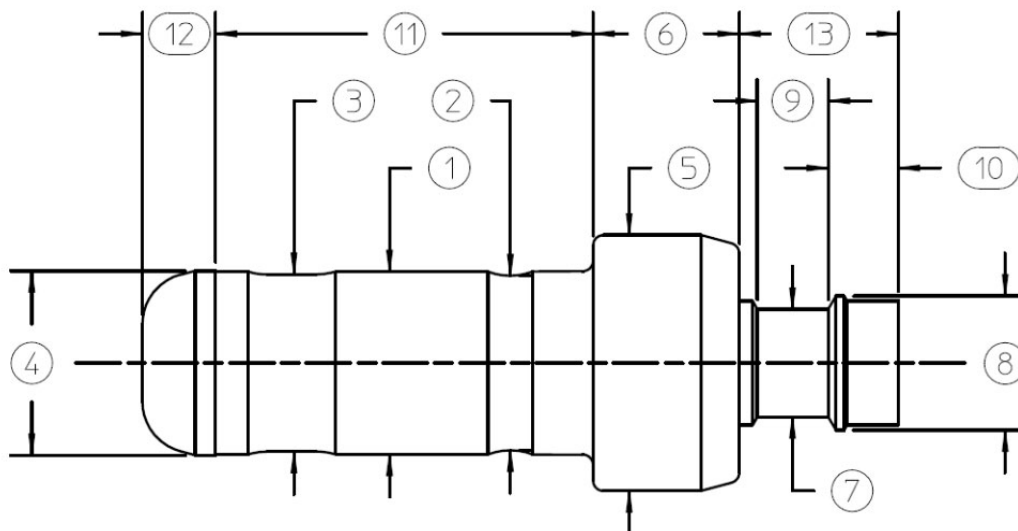


Figure 7 - Avbolt Eco assembled dimensions

Table 1 - Comparison of Avbolt Eco (measured) and Huck BOMTail (drawing) dimensions

Dimension		Avbolt Eco (Measured)
Number (Figure 7)	Description	
1	Sleeve body Ø	13.57
2	Crimped sleeve body Ø (closer to collar)	13.00
3	Crimped sleeve body Ø (closer to head)	13.20
4	Head diameter	13.85
5	Collar diameter	19.22
6	Collar length	11.21
7	Pull groove root Ø	8.32
8	Pull groove crest Ø	9.87
9	Pull groove root length	5.23
10	Pull groove crest length	4.75
11	Sleeve underhead length	31.35
12	Head height	5.80
13	Pin protrusion	11.23

*All measurements in the above table are in mm.

If the pin protrusion 13 (11.23mm, which is close to the 11.4mm that was previously sent to you) is taken as the “pull region” recited in the claims (as it is the longest dimension, *i.e.*, most favorable to SBD) and the pull groove root Ø 7 (8.32mm) is taken as the “diameter of the shank region” recited in the claims (as it is the shortest dimension, *i.e.*, most favorable to SBD and more favorable than the pull groove crest Ø 8 (9.87mm, which is close to the 10.1mm previously reported to you)), this product still falls within the claims as $11.23\text{mm} < 4(8.32\text{mm})$. I hope this clarifies the issue. If not, I would be happy to get on a call to discuss. If that is of interest, please send me some times that work for you and I’ll schedule a Teams meetings.

Regards,
Ric

Frederic T. Tenney

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From: Tenney, Frederic T.
Sent: Friday, May 23, 2025 3:32 PM
To: Schildkraut, Mark <Mark.Schildkraut@sbdinc.com>
Cc: Suereth, Sarah <Sarah.Suereth@howmet.com>
Subject: RE: SBD-Howmet - Avdel ECO Bolt

Dear Mr. Schildkraut,

I received your response and have no problem granting the requested 30 day extension. I will also ask our technical folks to answer your measurement questions. However, in light of the holiday weekend, I would not anticipate receiving their response before Tuesday; when I get it, I will send to you.

Regards,
Ric

Frederic T. Tenney

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From: Schildkraut, Mark <Mark.Schildkraut@sbdinc.com>
Sent: Friday, May 23, 2025 2:51 PM
To: Tenney, Frederic T. <Frederic.Tenney@howmet.com>
Subject: EXT: SBD-Howmet - Avdel ECO Bolt

Dear Mr. Tenney,

Please see the attached letter.

Regards.

Mark Schildkraut
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