

# Presentation of Patent Owner Factual Felt Corporation

The Patentability of Claims 1, 2, 4, 6  
and 7 of U.S. Patent No. 8,137,757

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- “Paper is not a roofing a building cover material.” Paper 16, pg. 2.
- “Petitioner’s expert is, self-admittedly, a less than ordinarily skilled artisan in the roofing and building cover materials field.” Paper 16, pg. 16.
- “The Collins ‘757 Patent is related to two provisional patent applications.” Paper 16, pg. 9.
- “Nail tabs provide reinforcement.” Paper 16, pg. 22.
- “[C]ontamination issues can quickly escalate.” Ex. 2003 ¶70.
- “Traditional gravure printing is unable to print anything resembling a nail tab.” Ex. 2004 ¶53.
- “[T]he three alleged combinations do not work for a multitude of reasons.” Paper 16, pg. 28.
- “Lassiter ‘409 Combined with Hefele Would Not Work.” Paper 16, pg. 28.
- “The Bayer Devices Cannot Produce A Nail Tab When Substituted in Lassiter.” Ex. 2004 ¶93.
- “Eaton expressly teaches away from using a heavily asphalt saturated substrate.” Ex. 2003 ¶95.

## “The Person of Ordinary Skill in the Art.” Ex. 2

- “Patent Owner submits that the ordinary skilled artisan would be a person skilled in the field of roofing materials such as asphalt shingles. Such a person would have a bachelor's degree and approximately 3-5 years of additional training and experience in the field of manufacturing roofing materials on asphalt substrates. (Ex. 2003 Todd Decl., ¶22 and Ex. 2003 Bohan Decl., ¶22).” Paper 16, pg.13.

## “The Person of Ordinary Skill in the Art.” Ex. 2

- “[Petitioner submits that] one of ordinary skill would be familiar with various methods of printing polymer on various substrates and for various purposes (*see generally* Lassiter, Hefele, Bayer, Eaton, Allman, Jack and Lalwani). (Ex. 1014, Levenson Dec., ¶ 12).[...] would understand various types of polymers can be printed using these methods [...] would be aware various methods of printing polymer are interchangeable and provide for predictable results [...] would possess at least a bachelor’s degree with knowledge of various printing methods and several years of industry experience in the printing field.” Paper 1, pg. 14.

(12) **United States Patent**  
Collins et al.

(10) **Patent No.:** US 8,137  
(45) **Date of Patent:** \*Mar

# Print Methodology for Applying Polymer Materials to Roofing Materials to Form Nail Tabs or Reinforcing Strips

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