

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SHENZHEN PINCAN TECHNOLOGY CO., LTD.
“Petitioner”

v.

The Ridge Wallet,
“Patent Owner”

U.S. Patent No. 10,791,808

DECLARATION OF DR. KIMBERLY CAMERON

SHENZHEN PINCAN Exhibit 1003 SHENZHEN PINCAN v. Ridge Wallet IPR2024-00340
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I. LIST OF REPORT APPENDICES AND EXHIBITS

Exhibit No.	Description
A	Comparison of U.S. Patent No. 10,791,808 and The Ridge Wallet Kickstarter 2.0 (“Kane”)
B	Comparison of U.S. Patent No. 10,391,393 and U.S. Patent 9,125,464 (“Minn”)

II. INTRODUCTION

1. This declaration regarding U.S. Patent No. 10,791,808 (the “’808 patent”) is submitted in connection with the proceeding identified above. I have been retained by counsel for SHENZHEN PINCAN TECHNOLOGY CO., LTD. (“Petitioner”) as an independent expert to evaluate the claims of U.S. Patent No. 10,791,808 (“the ’808 Patent”), and to provide opinions in connection with a petition for *inter partes* review before the Patent Trial and Appeal Board (“the Petition”).

2. I have been requested to compare the Challenged Claims to different prior art references and to consider whether the Challenged Claims are invalid.

A. Education and Work Experience

3. I am a Principal Engineer at Engineering Systems Incorporated (ESI), a leading scientific and engineering firm. I specialize in mechanical engineering, materials science and metallurgy, and have extensive experience with materials evaluation, mechanical design, mechanical testing, stress analysis, failure analysis, fatigue analysis, and fracture mechanics. I have also consulted on the design and manufacturability of various consumer electronics and consumer products. I have also performed numerous patent validity and infringement analyses.

4. I graduated with high honors from Princeton University with a degree in Mechanical Engineering and minors in Materials Science, Applied Mathematics and Engineering Physics. I have also received a masters and doctorate in Mechanical Engineering with a minor in

Materials Science and Engineering from Stanford University. I have received numerous awards including fellowships from the Department of Defense, the National Science Foundation, and Lucent Technologies. I am a Registered Professional Engineer in both Mechanical Engineering and Metallurgy in the State of California. I am also a registered patent agent.

III. SCOPE OF WORK

5. I have reviewed the '808 patent, and the prosecution file history, and references cited therein. I have also reviewed other prior art documents as discussed below.

6. I was requested to consider issues regarding validity of the Challenged Claims in this matter and specifically address the following topics in this opening Report: the level of skill of persons who would have worked in the field around the time of the alleged invention; and if the Challenged Claims are invalid as obvious.

7. My work described in detail below involved a comparison of the subject matter recited for the Challenged Claims of the '808 patent and the subject matter described in publications, patents, and systems that predate the earliest priority date The Ridge Wallet Challenged Claims are entitled to, which I understand to be February 1, 2017. I have also been asked to opine on the differences, if any exist, between the subject matter recited in the Challenged Claims and the prior art. To the extent my conclusion is that differences do exist, I have also been asked to opine on whether the subject matter recited in those claims would have been obvious to a person of ordinary skill in the art for the '808 patent in light of information available at the earliest priority date alleged by The Ridge Wallet.

8. My detailed analysis for each ground asserted is included in claim charts shown in the table of Exhibits of Section I, specifically, Exhibits A and B. Exhibit A contains invalidity grounds with Kane as the primary reference and Exhibit B contains invalidity grounds with Minn as the primary reference.

IV. DOCUMENTS RELIED ON

In preparing for and writing this Report and forming the opinions expressed herewith, I reviewed the '808 patent, the prosecution file history for the '808 patent and other family members (described in more detail below), the references cited in the prosecution of the '808 patent, additional prior art and other documents referred to herein, and various documents that discuss or refer to the subject matter of these references.

V. SUMMARY OF OPINIONS

9. After analyzing the prior art references and systems discussed herein, the knowledge of a person of skill in the art at the filing date of the '808 patent, and my experience, I conclude that the Challenged Claims are invalid because they are rendered obvious by one or more of the prior art references cited in this Report, which are identified as Exhibits A and B.

VI. RELEVANT LEGAL PRINCIPLES AND GUIDELINES

10. I have been informed of certain legal standards by Shenzhen Swztech's attorneys and describe my understanding of those standards in this section. I am relying only on instructions from Shenzhen Swztech's attorneys for these legal standards.

A. Level of Skill

11. I understand that patents and prior art are evaluated from the perspective of a hypothetical person of ordinary skill in the art with respect to the subject matter of the '808 patent and prior art.

12. I consider the '808 patent to be within the technological field of billfold wallets, which is supported by the specification of the '808 patent. For example, the specification describes that "[t]his invention relates to billfold wallets." *See* '808 patent at 4:43-45.

13. A person of ordinary skill in the art with respect to the subject matter of the '808 patent at the time of filing, February 2017, would have had an undergraduate degree in mechanical

engineering, or other technical training in product design or equivalent work experience in the development of consumer products. This person would also possess at least one year of experience in developing and/or evaluating mechanical aspects of similar products. I consider myself a person of ordinary skill in the art under this definition.

14. My opinion on the background of a person of ordinary skill in the art is based on consideration of the following factors: (1) educational level of the inventor; (2) type of problems encountered in the art; (3) prior art solutions to those problems; (4) rapidity with which inventions are made; (5) sophistication of the technology; and (6) educational level of active workers in the field.

15. I have considered the issues and arrived at the conclusions discussed in my Report from the perspective of this person of ordinary skill. I am, therefore, discussing what I believe a person of ordinary skill would have understood to be disclosed or suggested by a prior art reference during the relevant time period when analyzing that reference's disclosure.

B. Claim Interpretation

16. I have applied my understanding of the legal standards concerning claim construction, as discussed below, when analyzing the Challenged Claims of the '808 patent.

17. I understand that claims of a patent, and terms included in those claims, are interpreted from the perspective of one of ordinary skill in the art at the time of the invention in light of the intrinsic evidence, including the language of the claim-at-issue, the specification of the patent, other claims in the patent and the relevant prosecution history. Other evidence (e.g., a dictionary) not in the written record of the patent, and other extrinsic evidence also may be considered if it is consistent with, and not contradictory to, the intrinsic evidence. My understanding is that if the meaning of the claim is clear from the intrinsic evidence, it is not necessary to rely on extrinsic evidence. I also understand that generally a claim should not be

limited to a preferred embodiment described in the specification, but that, in certain cases, the scope of the right to exclude may be limited by a narrow disclosure. I also understand that the full scope of the claims must be supported by the specification.

C. Prior Art and Priority Date for the '808 Patent

18. I understand that a patent, publication, or product must qualify as prior art before it can be used to invalidate claims in a patent.

19. I understand that the America Invents Act ("AIA"), which changed the United States from a "first-to-invent" to "first-to-file" system, changed the law on what qualifies as prior art. I understand that post-AIA law to determine what qualifies as prior art should be applied here.

20. I understand that a prior art patent or published patent application qualifies as prior art if the effective filing date of that reference is prior to the effective filing date of the asserted patent.

21. I understand that a prior art product qualifies as prior art if the product was in public use, on sale, or otherwise available to the public before the effective filing date of the asserted patent.

22. I understand that a reference qualifies as a printed publication if it was publicly accessible prior to the effective filing date of the asserted patent. I also understand that public accessibility is determined on a case-by-case basis, but that a publication is generally publicly accessible if it was distributed or otherwise made available, where interested persons ordinarily skilled in the art could locate it by exercising reasonable diligence.

23. I understand that all of the claims of the '808 Patent have been challenged. These claims have a priority date of February 1, 2017 based on the filing date of Application No. 15/421,596 that resulted in the '808 Patent. Application No. 15/421,596 is a continuation in part of now-abandoned Application 14/706,019. The Challenged Claims are not entitled to a priority

date based on the filing date of Application 14/706,019 because all of the claims rely on disclosures that were not present in Application 14/706,019 (e.g., at least the limitations related to the auxiliary feature). Similarly, the Challenged Claims are not entitled to a priority date of PCT/US16/31472 filed May 9, 2016, because all of the claims rely on disclosures that were not present in Application 14/706,019 (e.g., at least the limitations related to the auxiliary feature). If there turns out to be a dispute about the priority date I reserve the right to respond further.

24. Unless explicitly noted, I have applied the February 1, 2017 priority dates in my analysis of the prior art. So, in my analysis of the prior art, I include patents, printed publications, and products in public use, on sale, or otherwise available to the public prior to February 1, 2017. To the extent it is determined that The Ridge Wallet is entitled to an earlier priority date than December 2017, I reserve the right to supplement my anticipation and obviousness analysis in light of the earlier priority date.

25. I understand that patents, printed publications, products, and other materials that qualify as prior art can invalidate an asserted claim as anticipated or obvious. All of the patents, printed publications, and products described in Exhibits A and B qualify as prior art under the rules discussed above.

26. I understand that invalidity must be shown by clear and convincing evidence.

D. Obviousness

27. I understand that under 35 U.S.C. § 103, if a prior art reference discloses fewer than all limitations of an asserted claim, the claim is still invalid if the differences between the subject matter of the claim and the prior art reference would have been obvious at the time of the invention to a person of ordinary skill in the art. I understand that obviousness can be based on a single prior art reference or a combination of references that disclose all of the limitations of an asserted claim, whether expressly or inherently.

28. I understand that the prior art reference and subject matter of the claim should be viewed from the perspective of one of ordinary skill in the art. I also understand that hindsight bias and insight cannot be used when determining whether a claim is obvious.

29. I understand that the following standards, which were provided by the Supreme Court of the United States in *KSR v. Teleflex*, may be applied during an obviousness analysis: (1) combining the prior art elements according to known methods to yield predictable results; (2) simple substitution of one known element for another to obtain a predictable result; (3) using a known technique to improve similar devices or methods in a similar way; (4) applying a known technique to a known device or method that is ready for improvement where the application produces predictable results; (5) “obvious to try” i.e., choosing from a limited, finite, number of predictable solutions with a reasonable expectation of success; (6) variations of known work in one field of endeavor applied in the same field or a different field based on market forces such as design incentives, if the variations would have been predictable to a person of ordinary skill; and (7) a teaching, suggestion, or motivation to combine the prior art reference disclosure to arrive at the claimed invention, where the teaching, suggestion, or motivation could be supplied by the knowledge of a person of ordinary skill in the art.

30. I understand that relevant factual considerations for an obviousness analysis include: (1) the scope and content of the prior art; (2) differences between the prior art and subject matter of the invention; and (3) the level of a person of ordinary skill in the art.

31. I understand that, in certain circumstances, secondary considerations of non-obvious can rebut a prima facie showing of obviousness including: (1) a long-felt need unmet in the prior art but met by the invention claimed in the asserted patent; (2) the commercial success or lack thereof of products or processes covered by the asserted patent; (3) unexpected results

achieved by the invention claimed in the asserted patent; (4) licenses of the asserted patent by third parties; and (5) deliberate copying of the invention claimed in the asserted patent. I also understand that secondary indicia are only considered if there is a relationship between the indicia and the invention. I also understand that independent invention of the subject matter by others at the time of the invention supports a finding of obviousness.

32. I understand that it can be important to describe a reason that would motivate a person of ordinary skill in the art to combine elements of the prior art in the way as claimed in the asserted patent, although this is not required by 35 U.S.C. § 103.

33. I understand that, ultimately, obviousness is a legal conclusion supported by factual considerations, which is based on a showing that all of the limitations of an asserted claim are present in the prior art and that the combination of the elements disclosed in the prior art is a predictable variation prompted by a known problem, design incentives, other market factors, or the knowledge of a person of ordinary skill, who would have implemented the combination with a reasonable expectation of success.

34. I understand that an obviousness analysis can be based on a combination of multiple prior art references. I also understand that the teaching, suggestion, motivation, or other reason to combine the references may be supplied by the references themselves or the common sense of a person of ordinary skill in the art. I also understand that market forces often drive innovation compared to scientific literature, and that a motivation to combine may be supplied by these market forces.

35. I understand that a person of ordinary skill in the art would recognize that a technique used to improve one device could be used to improve similar devices in the same way unless actual application of that technique is beyond the person's skill.

36. I understand that an obviousness analysis should be guided by practicality and common sense because sometimes familiar items have obvious uses beyond their primary purpose. I also understand that a person of ordinary skill is often able to combine the teachings of publications similar to pieces of a puzzle, where a person of ordinary skill in the art can also employ inferences and creative steps.

37. I understand that obviousness can be shown where it would have been obvious for a person of ordinary skill to try the combination, such as when market forces pressure a resolution to a problem for which there are a finite number of known, predictable solutions, or when a person of ordinary skill has reason to pursue known options because the result is the product of application of ordinary skill and common sense.

38. I understand that the combination of familiar elements according to known methods leading to predictable results that discloses all limitations of a claim can render the claim obvious. I understand that market forces can also drive variations of a limitation, whether in the same field of endeavor or a different one. If a person of ordinary skill in the art can implement the predictable variation, the limitation is rendered obvious.

39. I understand that the relevant question when combining prior art references is whether the techniques taught by the prior art are interoperable with each other such that a person of ordinary skill in the art would view them as a design choice or whether they could apply the techniques into a new combined system.

40. I understand that an obviousness analysis focuses on what was known or obvious to a person of ordinary skill in the art and is not limited to a patentee. Therefore, any need or problem known in the field of endeavor at the time of the invention that is addressed by the asserted patent can provide a reason for combining the elements found in the prior art.

41. I understand that a single prior art reference can render a claim obvious if the missing elements of the reference are supplied by the knowledge of a person of ordinary skill in the art.

42. I understand that the inherent teachings of the prior art are also applicable to the determination of obviousness.

43. I understand that prior art teachings can be combined when a person of ordinary skill in the art, using their understanding and knowledge would have combined the elements recited in the claims motivated by the general problem facing the inventor of the asserted patent. Under this analysis, the prior art references themselves, or any need or problem known in the field of endeavor at the time of the invention, can provide a reason for combining the elements of multiple prior art references in the claimed manner.

44. I understand that a comparison of the disclosure of the prior art versus properly construed limitations of an asserted claim is necessary to performing an obviousness analysis.

45. I understand that a means-plus-function limitation can be rendered obvious when a prior art reference, in combination of the knowledge of one of skill in the art, or a combination of references address both the function and corresponding structure of the limitation-at-issue, or an equivalent of the structure. The function and corresponding structure of the means-plus-function limitation must have been obvious at the time the invention was made to a person having ordinary skill in the relevant art in light of the teachings of the prior art.

E. Claim Construction

46. I have been instructed by counsel that claim construction is a matter of law for the arbiter of law to decide. I understand that in an *inter partes* review, claims are construed using the same claim construction standard that would be used to construe the claims in a civil action.

47. I understand that claim terms should be assigned their ordinary and customary meaning within the context of the asserted patent. In other words, a claim term is supposed to be given the meaning that the claim term would have to a person of ordinary skill in the art at the time of the invention in light of the teachings of the patent. I also understand that in some circumstances, a claim term may not have an ordinary and customary meaning to a person of ordinary skill in the art.

48. I understand that you look to sources such as the words of the claim, the asserted patent's specification, the prosecution history of the asserted patent (all of which are considered intrinsic evidence), as well as extrinsic evidence concerning the meaning of technical terms, the state of the art at the time of the invention, and relevant scientific principles, to determine how a person of ordinary skill in the art would understand a claim term. I understand that the intrinsic evidence is the primary evidence considered, but that it is also useful to look at extrinsic evidence when the intrinsic evidence is not sufficient.

49. I understand that the patentee can act as her own lexicographer to provide special meaning to claim terms or to intentionally disclaim any claim scope.

50. I understand that claims define the scope of the patent and the subject matter of the invention. Because of this, I understand that claim construction begins and remains focused on the claim language. I also understand that the context in which claim terms are used is very instructive in construing the claim. For example, the same term is given a consistent meaning throughout the patent, and the use of one term in a claim can provide meaning of the same term in other claims. Differences between the terms used in a claim are also useful. I further understand that when a claim lists elements separately, those elements are typically construed as distinct components of the invention.

51. I understand that a person of ordinary skill in the art also reads claim terms in the context of the entire patent, including the specification, so claims must be construed in light of the entire specification. At the end, the interpretation of a claim term must be confirmed in view of a full understanding of what the inventors actually invented.

52. I understand that the purpose of the specification is to describe and enable the invention so a claim term cannot have broader scope than the invention that is described in the patent.

53. I understand that the prosecution history is also part of the intrinsic evidence. The prosecution history can provide evidence of how the Patent Office and inventors understood the terms of the patent in light of the prior art. I also understand that a patentee could make arguments or amendments during prosecution that narrow the scope of a claim term or scope of the invention.

54. I understand that extrinsic evidence including testimony from experts and inventors, dictionaries, and treatises can be considered to determine the meaning of a claim term. I understand that extrinsic evidence should not be considered when it is not in the context of the intrinsic evidence. I also understand that extrinsic evidence should not be considered unless a claim term is ambiguous after consideration of intrinsic evidence. I further understand that extrinsic evidence is given less weight than intrinsic evidence.

55. I understand that a preamble term or phrase is not limiting when a complete invention is described in the claim body and the preamble is only used to state the purpose or use of the invention. I understand that the preamble can be limiting if it recites structure or steps that are essential or gives meaning to the claim. To determine whether the preamble is limiting, you should review the entire patent to determine what the inventors intended to have the claims encompass.

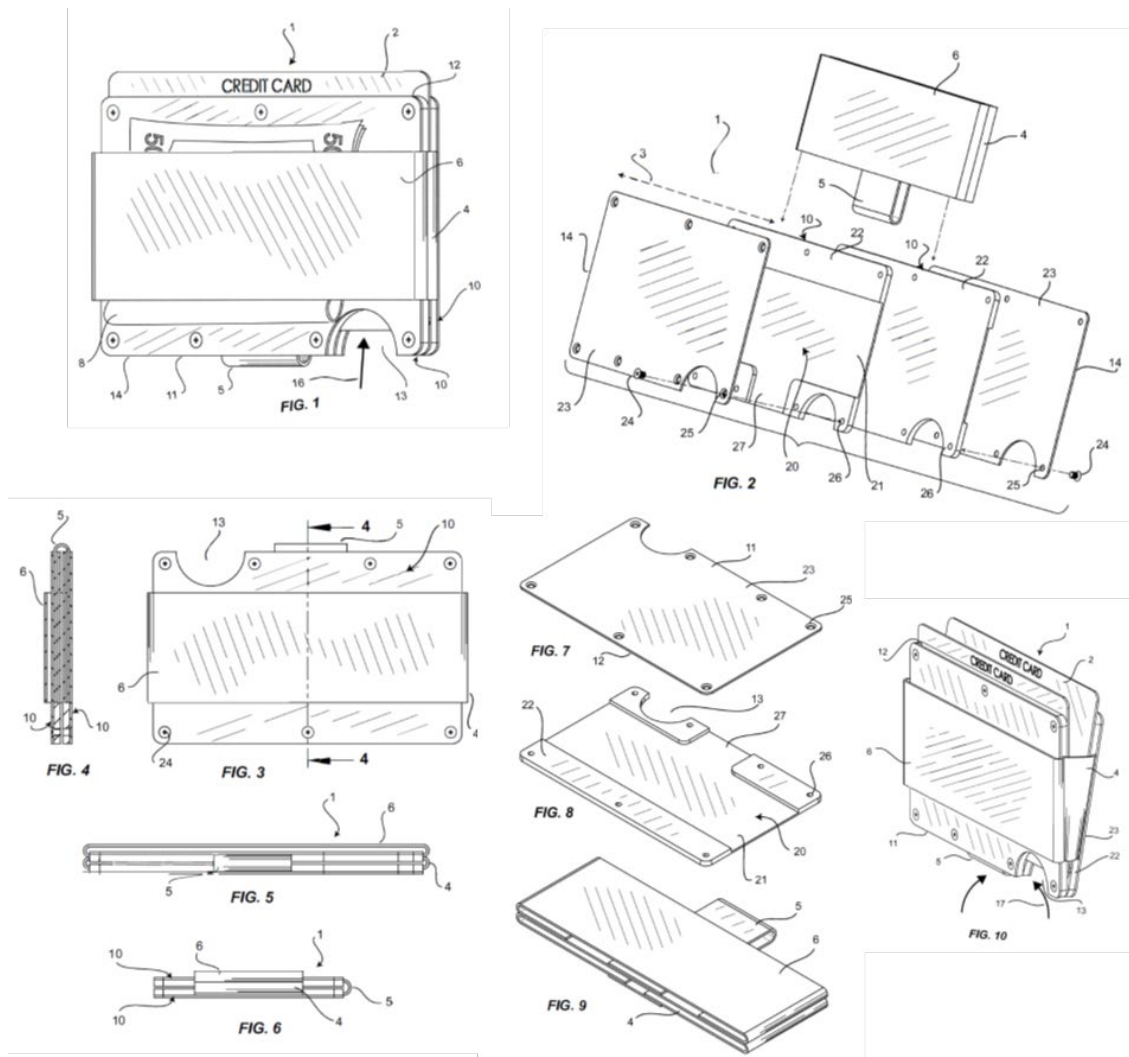
56. I understand that the preamble can be limiting if the claim is dependent on a preamble phrase and indicates it through use of an antecedent basis to define the invention, if the reference is necessary to understand the terms of the claim, and if the preamble provides additional structure or steps that is important to the claim.

57. I understand that claims can be written in means-plus-function form where the claim receives a feature of the invention by what it does rather than what it is. I understand that a claim element is a means-plus-function element when it is defined as a means or step for performing a function without description of the corresponding structure. I also understand that “mechanism,” “structure” or other generic words can also signal that a limitation is written in means-plus-function form. I understand that means-plus-function claims only cover the corresponding structure, material, or acts that are described in the specification, as well as any equivalents.

VII. BACKGROUND AND OVERVIEW OF THE '808 PATENT

A. U.S. Application No. 14/706,019

58. The '808 patent was filed as a continuation-in-part of Application No. 14/706,019 ("019 Application"). Below are the figures that were filed with the '019 Application.



59. As can be seen from the figures, there is no accessory with a tang shown. The only mention of an accessory used with a wallet in the specification is “[i]n an alternate embodiment a prior art money clip (not shown) attached to one of the rigid plates 10 may be used.” May 07, 2015 Specification page 9.

60. Challenged Claims 1-18 were all present in Application No. 14/706,019 with the exception of the following limitation for Claims 1-13:

an auxiliary feature removably attached to at least one of the at least two rigid plates, the auxiliary feature having a tang insertable into a recess formed inside the at least two rigid plates, the tang having a hook, the hook extending at an angle to the tang, the hook engaging an undercut of the recess to prevent inadvertent dislodgement of the auxiliary feature from the recess.

and the following limitation for Claims 14-17:

a recess formed inside at least one of the at least two rigid plates, the recess operable to receive a tang of an auxiliary feature, the recess having an undercut operable to engage a hook of the tang to prevent inadvertent dislodgement of the auxiliary feature from the recess when the auxiliary feature is removably positioned in at least one of the at least two rigid plates, the hook extending at an angle to the tang.

61. A non-final rejection was issued for all of the claims. The references used as bases for the rejections are listed below and the grounds are summarized in the subsequent table below:

- U.S. Patent No. 5,952,637 (“Strunk”)
- U.S. Patent 9,125,464 (“Minn”)
- U.S. Patent 1525745 (“Keefer”)
- U.S. Patent 4,477,928 (“Graff”)
- U.S. Patent 6,094,747 (“Malik”)
- U.S. Patent 8,381,360 (“Preston-Hall”)
- U.S. Patent D716,043 (“Wilk”)
- U.S. Patent 5,944,080 (“Podwika”)
- U.S. Patent 9,314,074 (“Johnson”)
- U.S. Patent 7,527,081 (“Coates”)

For convenience, the other references used in later actions are as follows:

- U.S. Patent 2,322,461 (“Mariano”)
- U.S. Patent 11,348 (“Andrews”)

- U.S. Patent 6,205,622 (“Odishoo”)
- Kickstarter, the Ridge Wallet 2.0 (“Kane”)
- U.S. Patent 6,230,878 (“Lehr”)
- U.S. Patent 2,409,019 (“Cree”)
- U.S. Patent Application Publication 2015/0059936 (“Singer”)

Claims	Rejection Ground
1, 2, 10, 11, 14	Strunk in view of Minn or Keefer
13	Strunk in view of Minn or Keefer in further view of Graff or Malick or Preston-Hall
1, 2, 11	Wilk in view of Podwika
13	Wilk in view of Podwika in further view of Graff or Malik or Preston-Hall
6, 7	Wilk in view of Podwika in further view of Minn or Johnson
1-11, 13-18	Wilk in view of Coates in further view of Podwika
1, 2, 14	Mariano
1-8, 14-18	Mariano in view of Andrews
11	Mariano in view of Andrews in further view of Odishoo
1, 6, 7, 11, 12, 14, 18	Minn
1-11, 13-18	Minn in view of Coates in further view of Podwika

62. In response, the applicant included the limitation of Claim 12 into independent Claim 1 (and so into claims 1-13) and argued that the finger notch was not present in Minn. The applicant also moved the limitations of Claims 15 and 16 into independent claim 14 (and therefore into claims 14-18) and argued that the references relied upon for claims 15 and 16 did not teach or fairly suggest the limitation “the groove in a first lamina of a laminate construction of each rigid plate slidably receiving one part of the at least one encircling elastic band, and a second lamina of the laminate construction of each rigid plate is removably attached to the first lamina to capture the at least one elastic band and provide a smooth surface for glide.” File History 14/706,019, May 7, 2015 Response to Office Action, page 8. The applicant also added new claims 19 and 20.

63. The examiner upheld the anticipation rejection over Minn because Minn discloses notches and the “functionality of using the notches for elevating the contents by providing a fulcrum to lever the proximal ends together is an intended use.” File History 14/706,019, Final Office Action, page 2. The examiner also upheld the obviousness rejection of Minn in view of Coates in further view of Podwika. The examiner explained that:

Contes also teaches the panels each comprising of two portions 24a/24b and the elastic portion is positioned between recesses of the two rigid portions in fig. 13. Therefore, it would have been obvious to one of ordinary skill in the art to provide each rigid member of Minn of two portions and the elastic portion in positioned between recesses of the two rigid portions as taught by Contes to provide the desired construction for the rigid panel and to minimize the thickness. Also Podwika teaches that providing attachment as optional (see abstract). Therefore, to provide the two rigid portions without other attachment means to keep the device freely slidingly moving as taught by Podwika would have been obvious.

Regarding claims 4 and 5, and 17, it would have been obvious to one of ordinary skill in the art to provide screws or pressure sensitive adhesive to provide the desired fastening means for the two portions.

Final Office Action January 16, 2018, page 2-3.

64. Regarding the original claims 1-18, the examiner explained that “[a]pplicant’s arguments have been fully considered but they are not persuasive.” Page 3 Final Office Action January 16, 2018. The examiner allowed claim 19.

65. Applicant amended the claims such that all of the dependent claims depended from claim 19. In response, the Examiner issued a new rejection based on anticipation over Kane, obviousness over Kane, Kane in view of Podwika or Lehr. Page 2 May 31 office action.

66. In response, the applicant added the following limitations to all of the claims: “with a screw having male threads mating with female threads formed in the first lamina” and “the second lamina having a plurality of sunken regions surrounding screw holes for receiving a head of the screw therein, wherein the head does not protrude from a plane defined by an exterior surface of the second lamina.”

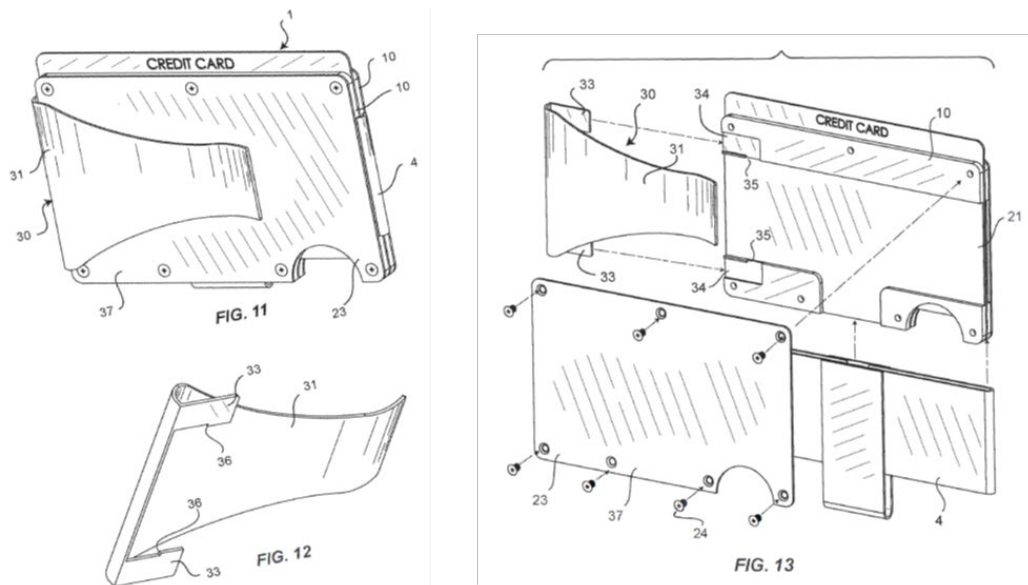
Page 5, October 1, 2018 page 5 December 18, 2018.

67. In response the examiner added a new rejection of Kane in view of Cree or Singer. The examiner explained that “it was known in the art to provide flushed screws as taught by Cree or Singer to provide a smooth surface for the user.” Page 2 Final office action.

68. The applicant then filed a request for continued examination and added a limitation that described the relative thickness of the laminate construction to all of the claims. 6-18-2019. The examiner concluded in a non-final office action on August 2, 2019 that this was also disclosed by Kane and upheld the rejections. This application was then abandoned.

B. U.S. Patent Application 15/421,596

69. A continuation in part application was filed based on U.S. Patent Application 14/706,019. In this application, Figures 11-13 were added, which are reproduced below.



70. Challenged Claims 1-18 were all present in Application No. 14/706,019 with the exception of the following limitation for Claims 1-13:

an auxiliary feature removably attached to at least one of the at least two rigid plates, the auxiliary feature having a tang insertable into a recess formed inside the at least two rigid plates, the tang having a hook, the hook extending at an angle to the tang, the hook engaging an undercut of the recess to prevent inadvertent dislodgement of the auxiliary feature from the recess.

and the following limitation for Claims 14-18:

a recess formed inside at least one of the at least two rigid plates, the recess operable to receive a tang of an auxiliary feature, the recess having an undercut operable to engage a hook of the tang to prevent inadvertent dislodgement of the auxiliary feature from the recess when the auxiliary feature is removably positioned in at least one of the at least two rigid plates, the hook extending at an angle to the tang.

71. Claims 19-24 were new. In a non-final office action, the examiner rejected all of the claims based on the grounds summarized in the table below.

Claims	Rejection Ground
1, 2, 10, 11, 14	Strunk in view of Minn or Keefer
13	Strunk in view of Minn or Keefer in further view of Graff or Malick or Preston-Hall
1, 2, 11	Wilk in view of Podwika
13	Wilk in view of Podwika in further view of Graff or Malik or Preston-Hall
6, 7	Wilk in view of Podwika in further view of Minn or Johnson
1-11, 13-18	Wilk in view of Coates in further view of Podwika
1, 2, 14	Mariano
1-8, 14-18	Mariano in view of Andrews
11	Mariano in view of Andrews in further view of Odishoo
1, 6, 7, 11, 12, 14, 18	Minn
1-11, 13-18	Minn in view of Coates in further view of Podwika
1-18	Kane
19-24	Kane in view of Chapin

72. In response the applicant added the following limitations. For Claims 1-13 the following limitation was added:

an auxiliary feature removably attached to at least one of the at least two rigid plates, the auxiliary feature having a tang insertable into a recess formed inside the at least two rigid plates, the tang having a hook, the hook extending at an angle to the tang, the hook engaging an undercut of the recess to prevent inadvertent dislodgement of the auxiliary feature from the recess

and for Claims 14-18 the following limitation was added:

a recess formed inside at least one of the at least two rigid plates, the recess operable to receive a tang of an auxiliary feature, the recess having an undercut operable to engage a hook of the tang to prevent inadvertent dislodgement of the auxiliary feature from the recess when the auxiliary feature is removably positioned in at least one of the at least two rigid plates, the hook extending at an angle to the tang

and for Claims 19-24 the following limitation was added:

the at least one recess having an undercut operable to engage a hook of the tang to prevent inadvertent dislodgement of the second auxiliary feature from the at least one recess, the hook extending at an angle to the tang, the at least one recess receiving the tang being disposed inside at least one of the two rigid plates;

73. The examiner allowed the claims based on the disclosures considered not having “the limitation of the recess having an undercut operable to engage a hook of the tang.” August 31 Notice of Allowance page 2.

74. Notably, the examiner did not consider U.S. Patent No. 9,125,465 (“Beckley”), U.S. Patent Application Publication 2006/0010661 (“Murphy”), or U.S. Patent 5,103,884 (“Roman”).

C. Challenged '808 Patent Claims

75. The following claims are challenged from the '808 Patent:

1. A compact wallet, comprising:

at least two rigid plates interposed to sandwich cardlike contents there between, each rigid plate having a longitudinal extent;

at least one encircling elastic band interposed with the at least two rigid plates along longitudinal extents thereof to bias them inwardly and securely hold the card-like contents while providing elastic volume there between for adding or removing contents;

a channeling means configured to minimize the profile of the wallet and hold position of the at least one encircling elastic band with respect to each rigid plate while allowing freedom for the dynamic extension and contraction of the band over the entire running length thereof; and,

an auxiliary feature removably attached to at least one of the at least two rigid plates, the auxiliary feature having a tang insertable into a recess formed inside the at least two rigid plates, the tang having a hook, the hook extending at an angle to the tang, the hook engaging an undercut of the recess to prevent inadvertent dislodgement of the auxiliary feature from the recess,

whereby, card-like contents may be carried with minimal silhouette on or with a person while allowing expandable capacity and ready access to individual contents from between the at least two rigid plates.,

2. The compact wallet of claim 1, wherein the channeling means is a longitudinal groove in a first lamina of a laminate construction of each rigid plate, the groove slidably receiving one part of the at least one encircling elastic band.
3. The compact wallet of claim 2, wherein a second lamina of the laminate construction of each rigid plate is removably attached to the first lamina to hold the at least one elastic band in capture and provide a smooth surface for glide purposes
4. The compact wallet of claim 3, wherein the second lamina is attached to the first lamina by screws.
5. The compact wallet of claim 3, wherein the second lamina is attached to the first lamina by pressure sensitive adhesive means.
6. The compact wallet of claim 1, wherein each rigid plate is comprised of metal for RFID protection.
7. The compact wallet of claim 1, wherein each rigid plate is metalized for RFID protection.
8. The compact wallet of claim 3, wherein at least one of the first or second lamina of each rigid plate is comprised of metal.
9. The compact wallet of claim 1, further comprising a first elastic strap positioned over the ends of the at least two rigid plates transverse to the longitudinal extents, the positioning functioning to retain the card-like contents from that end.
10. The compact wallet of claim 1, further comprising a second elastic strap positioned over an outside surface of one of the at least two rigid plates to hold additional contents on the outside surface.
11. The compact wallet of claim 1, wherein the card-like contents comprise one or more of a credit card, a driver's license, an ID card, a business card, an affiliation card, a currency bill, a loyalty card, a coupon, a receipt or a personal paper.
12. The compact wallet of claim 1, further comprising aligned finger notches through proximal ends of the rigid plates to expose an edge of the card-like contents for the purpose of pushing the edge to elevate the contents into view through distal ends of the rigid plates, said edge providing a fulcrum to lever the proximal ends together for the purpose of fanning the distal ends apart in display of the contents.
13. The compact wallet of claim 1, wherein the encircling elastic band is comprised of woven elastic fabric.
14. A compact wallet, comprising:

at least two rigid plates interposed to sandwich card-like contents there between, each rigid plate having a groove along a longitudinal extent thereof,

at least one encircling elastic band slidably interposed in the grooves to bias the at least two rigid plates inwardly and securely hold the card-like contents while providing elastic volume there between for adding or removing contents, the grooves configured to hold position of the at least one encircling elastic band with respect to each rigid plate while allowing freedom for the dynamic extension and contraction of the band over the entire running length thereof; and

a recess formed inside at least one of the at least two rigid plates, the recess operable to receive a tang of an auxiliary feature, the recess having an undercut operable to engage a hook of the tang to prevent inadvertent dislodgement of the auxiliary feature from the recess when the auxiliary feature is removably positioned in at least one of the at least two rigid plates, the hook extending at an angle to the tang,

whereby, card-like contents may be carried with minimal silhouette on or with a person while allowing expandable capacity and ready access to individual contents from between the at least two rigid plates.

15. The compact wallet of claim 14, wherein the groove is in a first lamina of a laminate construction of each rigid plate, the groove slidably receiving one part of the at least one encircling elastic band.
16. The compact wallet of claim 15, wherein a second lamina of the laminate construction of each rigid plate is removably attached to the first lamina to capture the at least one elastic band and provide a smooth surface for glide.
17. The compact wallet of claim 16, wherein the second lamina is attached to the first lamina by screws.
18. The compact wallet of claim 1, wherein each rigid plate is comprised of metal for RFID protection.
19. A method of making a modular compact wallet, comprising the steps:

providing at least two rigid plates interposed to sandwich card-like contents there between, each rigid plate having a groove along a longitudinal extent thereof; at least one encircling elastic band slidably interposed in the grooves to bias the at least two rigid plates inwardly and securely hold the card-like contents while providing elastic volume there between for adding or removing contents, the grooves configured to hold position of the at least one encircling elastic band with respect to each rigid plate while allowing freedom for the dynamic extension and contraction of the band over the entire running length thereof, at least one groove additionally having at least one recess positioned outbound of the elastic band;

providing a first auxiliary feature having at least one tang;

inserting, removably, the at least one tang of the first auxiliary feature into the at least one recess to make the first auxiliary feature available at an outside face of at least one of the two rigid plates;

removing, selectively, the first auxiliary feature;

providing, selectively, at least a second auxiliary feature having at least one tang; and

inserting, removably, the at least one tang of the second auxiliary feature into the at least one recess to make the second auxiliary feature available at an outside face of at least one of the two rigid plates, the at least one recess having an undercut operable to engage a hook of the tang to prevent inadvertent dislodgement of the second auxiliary feature from the at least one recess, the hook extending at an angle to the tang, the at least one recess receiving the tang being disposed inside at least one of the two rigid plates;

whereby, card-like contents may be carried with minimal silhouette on or with a person while allowing expandable capacity and ready access to individual contents positioned interiorly to the at least two rigid plates and proving additional functionality from at least one auxiliary feature positioned exteriorly thereto.

20. The method of claim 19, wherein the at least one recess has an undercut and the at least one tang has a hook, the hook and undercut interpositioned to secure the at least one auxiliary feature against inadvertent dislodgement.
21. The method of claim 20, wherein at least one of the auxiliary features is a money clip.
22. The method of claim 19, wherein the groove is in a first lamina of a laminate construction of each rigid plate and the at least one recess is in at least one of the first lamina.
23. The method of claim 22, wherein a second lamina of the laminate construction of each rigid plate captures the at least one elastic band and the at least one tang when removably attached to the first lamina and facilitates placement and removal of the at least one elastic band and the at least one tang when removed from the first lamina.
24. The method of claim 23, wherein the second lamina is attached to the first lamina by screws.

VIII. CLAIM CONSTRUCTION

76. In my opinion, all of the claim terms should be given their ordinary and customary meaning in the context of the '808 Patent. To the extent that Patent Owner proposes different constructions, I reserve the right to respond and provide further analysis of the claims.

IX. PRIOR ART INVALIDITY ANALYSIS OF THE '808 PATENT

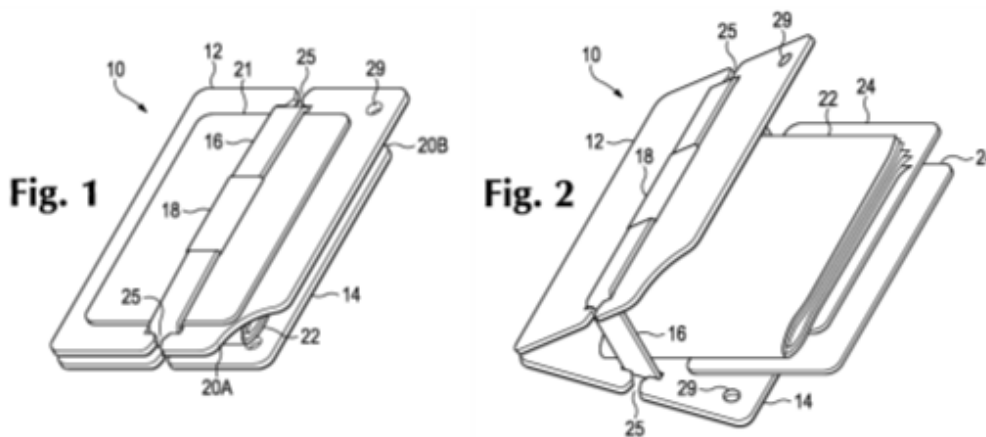
77. In the following sections, I provide an overview of the most relevant prior art references prior to giving a detailed explanation of how the references, in combination, invalidate the Challenged Claims. It is my opinion that the disclosure of each prior art reference would enable a person of ordinary skill to make and use the apparatus as disclosed in the reference.

A. Brief Overview of the Prior Art References

1. U.S. Patent 9,125,464 (“Minn”)

78. Minn was filed on March 13, 2013 and published on October 24, 2013. I understand that Minn is prior art under AIA 35 U.S.C. §§ 102(a)(1) or (2) because it is a printed publication filed before the earliest claimed priority date for the Challenged Claims.

79. As shown in Figure 1 and 2 below, Minn discloses a compact wallet.



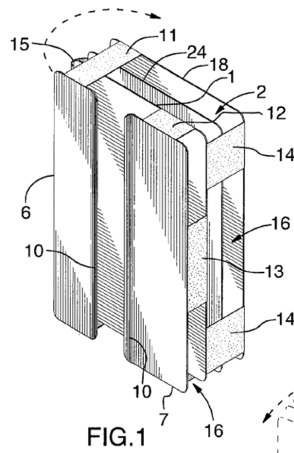
80. Plates 12 and 14, are described as being made from metal and/or carbon fiber, which would make the plates rigid. Minn 2:19-20. Strap 16 is elastic and holds the plates together. *Id.* 2:20-21. Various combinations of money credit cards or other cards can be compressively held between the plates. *Id.* 2:22-25.

81. Exhibit B describes additional technical features of Minn and demonstrates how those features map to the Challenged Claims.

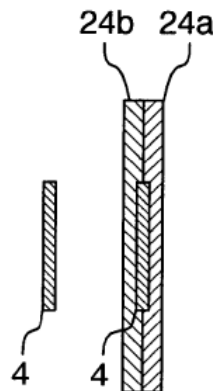
2. U.S. Patent 7,527,081 (“Coates”)

82. Coates was filed on June 18, 2004 and published on December 22, 2005. I understand that Coates is prior art under AIA 35 U.S.C. §§ 102(a)(1) or (2) because it is a printed publication filed before the earliest priority date for the Challenged Claims.

83. As shown below in Figure 1, Coates discloses a compact wallet with elastic bands between panels. The main panels 1 are the size of a credit card.



84. Coates also teaches enclosing an elastic band in a laminate structure with a groove as shown below in Figure 13. In Figure 13, lamina are 24a and 24b and the elastic band is 4.



85. Exhibit B describes additional features of Coates and demonstrates how those features map to the Challenged Claims.

3. U.S. Patent No. 5,944,080 (“Podwika”)

86. Podwika was filed on May 20, 1998 and issued on August 31, 1999. I understand that Podwika is prior art under AIA 35 U.S.C. §§ 102(a)(1) or (2) because it is a printed publication filed before the earliest priority date for the Challenged Claims.

87. As shown below in Figure 1, Podwika discloses a money and card holder with an integral retaining clip and an elastic retaining band. Abstract, Podwika.

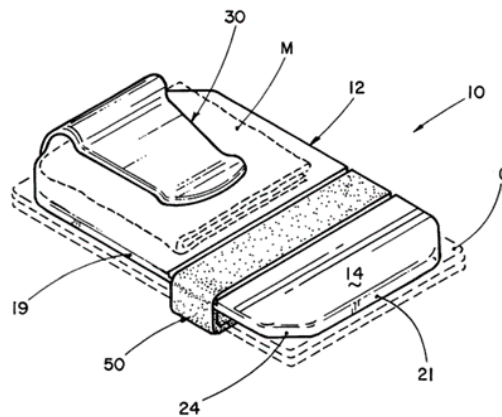


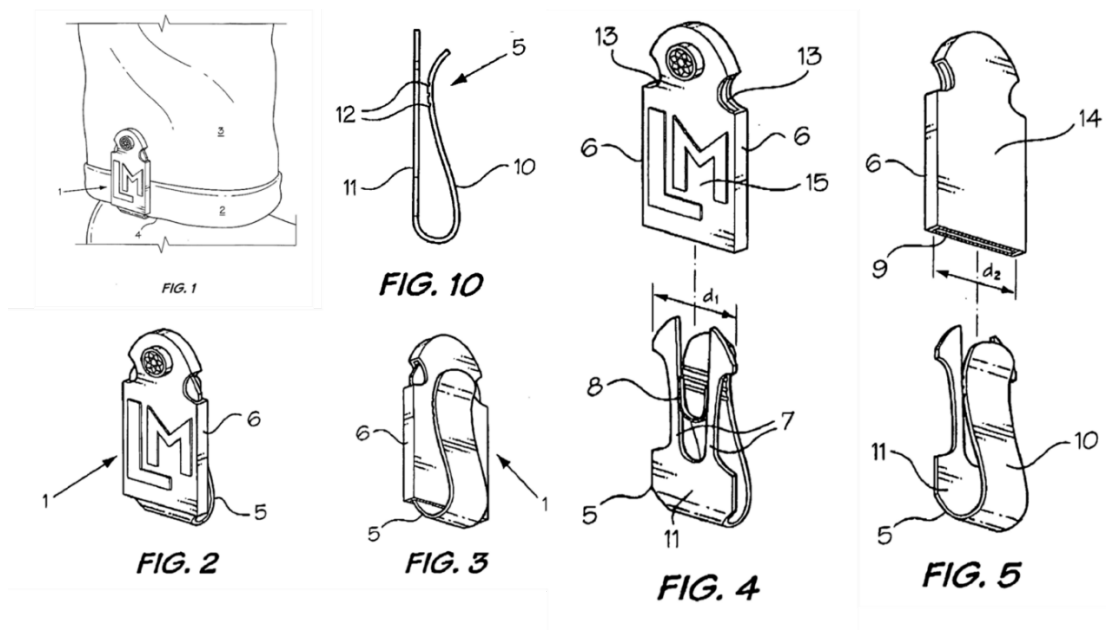
FIG. 1

88. As shown in Figure 1, Podwika teaches how to position an elastic band with a groove. Exhibit B describes additional technical features of Podwika and demonstrates how these features map to the Challenged Claims.

4. U.S. Patent Application Publication 2006/0010661 (“Murphy”)

89. Murphy was filed on July 18, 2005 and published on January 19, 2006. I understand that Murphy is prior art under AIA 35 U.S.C. §§ 102(a)(1) and (2) because it is a printed publication filed before the earliest claimed priority date for the Challenged Claims.

90. As shown in Figure 1, 2, 3, 5 and 10 below, Murphy discloses a “device purposed to adjust the size or shape of a garment or other item, or to be worn itself as an accessory.” Abstract, Murphy. The removable clip of Murphy uses two tangs with a hook at an angle to engage a recess.



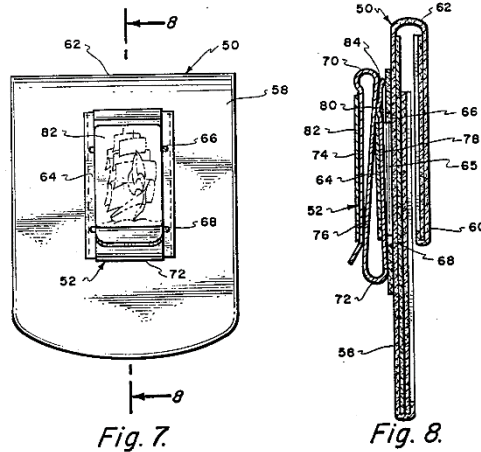
91. Murphy discusses the benefit of being able to exchange the display portion of the sleeve. As illustrated in FIG. 5, the clip-member typically includes a grasping portion, as represented by the exterior clip portion (10), which grips the interior face of the pant leg (3), and a display element engagement portion, such as interior clip portion (11), which is structured to receive the display element. As illustrated, the interior clip portion (11) is designed to match in size and geometry with a flexible clipping element engagement portion of the display element, such as the cavity (9) defined in sleeve (6).

92. Exhibits A and B describe additional technical features of Murphy and demonstrate how those features map to the Challenged Claims.

5. U.S. Patent 5,103,884 (“Roman”)

93. Roman was filed on February 2, 1990 and issued on April 14, 1992. I understand that Roman is prior art under AIA 35 U.S.C. §§ 102(a)(1) or (2) because it is a printed publication filed before the earliest priority date for the Challenged Claims.

94. As shown in Figs. 7 and 8, Roman discloses a wallet with a removable clip.



95. As explained in the background of the invention, an “object of the present invention is to provide a wallet, or device for carrying money and other valuables which has a removable clip which can be used in a normal fashion as a money clip, but also can be used to attach to the wallet to carry it in a concealed fashion. Still another object of the present invention is to provide a unique wallet having a removable clip which is small and compact for carrying money and credit cards which is small and compact and is easily accessible without removal from the clipped position.” Roman 1:54-64.

96. Exhibit A and B describe additional technical features of Roman and demonstrate how these features map to the Challenged Claims.

6. U.S. Patent 9,125,465 (“Beckley”)

97. Beckley was filed on Aug. 29, 2011, and published on March 6, 2014, and issued on September 8, 2015. I understand that Beckley is prior art under AIA 35 U.S.C. §§ 102(a)(1) or (2) because it is a printed publication filed before the earliest claimed priority date for the Challenged Claims.

98. Beckley describes a removable clip 3 that is used with a compact wallet as shown in Figure 1 below.

This diagram shows an exploded perspective view of a mobile phone case assembly. The components are labeled with reference numerals: 1 (main case body), 2 (bottom bezel), 3 (bottom flap), 4 (top flap), 5 (top bezel), 8 (side bezel), 9 (side flap), 10 (corner reinforcement), 11 (internal frame), 12 (top bezel), 13 (bottom flap), 14 (bottom bezel), 15 (bottom bezel), 16 (bottom bezel), 17 (top bezel), and 22 (bottom bezel). Dashed lines indicate the alignment and assembly sequence of the parts.

It is held in place by a pair of barbs seen at 13 mated into a set of cavities 14 on the base 2.” Beckley, 4:30-40.

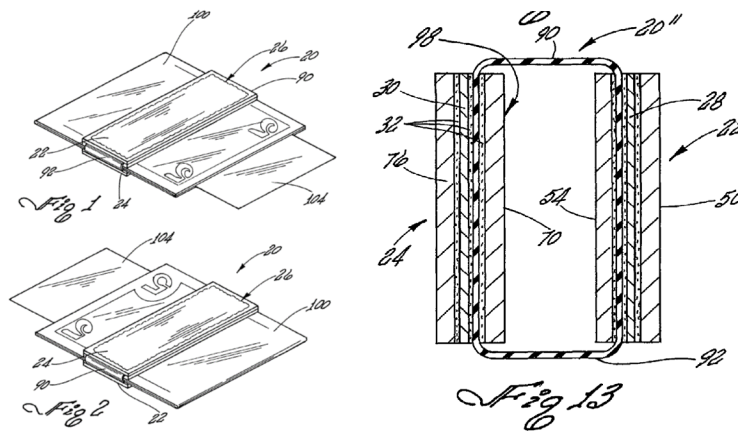
100. Exhibit A and B describe additional technical features of Beckley and demonstrate how these features map to the Challenged Claims.

7. U.S. Patent 8,381,360 (“Preston-Hall”)

101. Preston-Hall was filed on May 27, 2011, and published on July 5, 2012, and issued on February 26, 2013. I understand that Preston-Hall is prior art under AIA 35 U.S.C. §§ 102(a)(1) or (2) because it is a printed publication filed before the earliest claimed priority date for the Challenged Claims.

102. As shown in Figure 1, 2, and 13 below, Preston-Hall discloses a woven elastic band for use as an encircling elastic band. As explained in the specification, “FIG. 13 is a cross-sectional view of yet another embodiment of the a card and currency carrying device having a pair of spaced, deflectable spring members each having an undeflected position and a deflected position responsive to a compression deflection force applied concurrently thereto, a first pair and a second

pair of planar Support members operatively connected on to each side of and enclosing the other of said pair of spaced, deflectable spring members and endless loop of a woven, longitudinally extendable, elastic fabric material having a predetermined length located between each of the inner planar Support member and its adjacent deflectable spring forming an operative arrangement there between.” Preston-Hall 8:4-16.



103. Exhibit B describes additional technical features of Preston-Hall and demonstrates how those features map to the Challenged Claims.

8. KickStarter The Ridge Wallet 2.0 (“Kane”)

104. The Ridge Wallet is described at <https://www.kickstarter.com/projects/124039987/the-bridge-front-pocket-wallet> (last updated June 11, 2014, last accessed July 16, 2023).

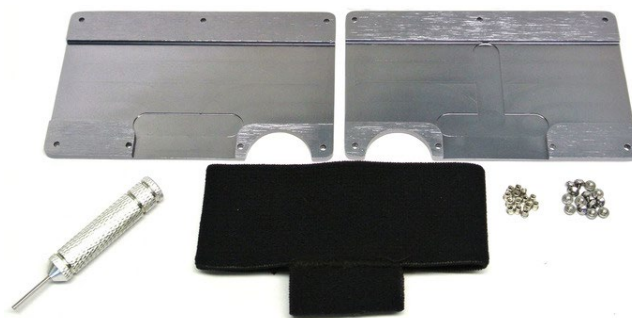
105. The Ridge Wallet 2.0 is described at <https://www.kickstarter.com/projects/124039987/the-ridge-wallet-20> (last updated January 27, 2014, last accessed July 16, 2023) and was also captured by wayback machine at: <https://web.archive.org/web/20130903204002/https://www.kickstarter.com/projects/124039987/the-ridge-wallet-20>.

106. Kane is prior art under 102(a)(1) because it is a printed publication available before the earliest claimed priority date for the Challenged Claims.

107. Like the '808 Patent, Kane teaches a compact wallet that has two rigid plates and an encircling elastic band to allow expandable access to cards between the rigid plates. Below is an image of the wallet shown in Kane.



108. The internal structure of the rigid plates and elastic band is also shown in Kane and is reproduced below. The rigid plates are constructed from the aluminum lamina seen below and a faceplate that is screwed on to capture the elastic band (below in black). As explained by Kane, while the lamina with the groove shown below is made from aluminum for RFID shielding, “[y]ou can then choose between Titanium, Aluminum, or Carbon Fiber for the outer faceplates.” Kane.



109. Exhibit A describes additional technical features of Kane and demonstrates how those features map to the Challenged Claims. Kane contains all of the elements of the Challenged Claims except for the limitations related to an auxiliary feature.

B. Motivation to Combine References

110. I understand that one consideration made when determining whether prior art references can be combined is whether the products or subject matter described in the printed publications are within the same class or category of devices, addressing the same problem or market need, and would benefit from the same improvement or innovation. I considered these questions when forming my opinions about motivations to combine the prior art references and products discussed herein.

111. I am of the opinion that all of the prior art references and products considered in this Report teach or disclose devices that fall within the same category—compact wallets or components that can be used with a compact wallet.

112. The developers of these references faced similar technical and design challenges and decisions. For example, Beckley, Murphy and Roman are similar enough to the other references discussed to share similar mechanical design issues, and a POSITA would have understood how to apply the teachings of Beckley, Murphy or Roman to the issues presented by a clip designed to work with the wallets of the other prior art references discussed.

113. To the extent The Ridge Wallet alleges that one of the primary prior art references discussed herein do not disclose a limitation of the Challenged Claims, the limitation would be rendered obvious by a secondary prior art reference and its teachings cited in the attached claim charts, as well as in view of the knowledge of a person of ordinary skill in the art. The combination would render the challenged claim obvious for the reasons stated in this Report and in the accompanying charts.

114. A person of ordinary skill in the art would be familiar with a variety of possible mechanical designs to implement an accessory for a wallet, and more generally, mechanical designs for removably attaching an accessory to another device. One of skill in the art would

understand that substituting the structure in a prior art reference with the exact structure recited in this claim element was an obvious design choice, requiring no more than routine experimentation. Such a modification would simply apply one of a finite number of well-known techniques or structural features in a predictable manner, to achieve well-known, predictable results.

115. A person of ordinary skill in the art would be motivated to combine the primary prior art reference with the references discussed herein and/or with the knowledge of a person of ordinary skill in the art at least because they address common problems and provide overlapping teachings, such that it would have been obvious for a person of ordinary skill in the art to try, and because it is also a combination of prior art elements using known methods, or substitution of one prior art element for another, to yield predictable results.

116. To the extent The Ridge Wallet contends that any other limitation is missing from a primary prior art reference, it would have been obvious for a person of skill in the art to modify the reference and include that limitation for the reasons discussed in the accompanying charts.

C. All Challenged Claims of the '808 Patent are Invalid

117. The accompanying charts, in Exhibits A and B provide examples of where a prior art reference discloses, expressly or inherently, each limitation of the Challenged Claims. I have also indicated where the knowledge of a person of ordinary skill in the art at the time the alleged invention was made would have made various limitations obvious. The citations within each accompanying chart are illustrative, not exhaustive, of the disclosure contained within that reference or demonstrated by that product. For any particular citation or disclosure, I reserve the right to introduce additional disclosure or images to the extent allowed. I further reserve the right to introduce other text, figures, or disclosure from the same or other documents concerning that reference to provide additional context for the citation. When a chart provides a citation to a particular figure, the citation should be understood to encompass the disclosure relating to that

figure and vice versa. I also reserve the right to rely upon other documentation or information produced in this proceeding, such as deposition testimony or evidence relied on by The Ridge Wallet's experts, to explain or provide additional context to the cited portion of each reference discussed herein.

118. When I analyze a claim limitation that is construed as a means-plus-function limitation, I considered whether the prior art discloses both the function and corresponding structure or its equivalent. To simplify my explanation of this analysis I simply explain whether the claim limitation is anticipated or rendered obvious. It is my opinion, however, that both the function and corresponding structure or its equivalent are disclosed by the prior art reference being analyzed.

2. Kane

119. As explained in the claim chart in Exhibit A, Kane invalidates the Challenged Claims under 35 U.S.C. § 103 in combination with the knowledge of a person of ordinary skill in the art and the references as detailed in the chart, as shown in the claim chart.

120. As shown in the claim chart, Kane contains all of the elements of the Challenged Claims except for the limitations related to an auxiliary feature removably attached to at least one of the at least two rigid plates, the auxiliary feature having a tang insertable into a recess formed inside the at least two rigid plates, the tang having a hook, the hook extending at an angle to the tang, the hook engaging an undercut of the recess to prevent inadvertant dislodgement of the auxiliary feature from the recess.

121. A POSITA would also know of prior art wallets that incorporated a removable money clip or other accessory and the desirability of such accessories. A POSITA would be motivated to incorporate the money clip of Beckley into the Kane wallet by using a recess and

undercut as described in Beckley between the lamina that are screwed together. This would allow the money clip to be removed when it was desired to use the wallet without the money clip.

122. Another similar way to have a removable accessory attached is taught by Murphy. A POSITA would know that the clip of Murphy could be used to attach the wallet to a belt or portion of clothing or could also be used as a money clip. A POSITA would be motivated to use the arrangement shown in Murphy as well, which can easily be incorporated with the two lamina structure of the Kane wallet. A POSITA would know how to adjust the dimensions of the clip of Murphy and the lamina to successfully integrate the clip of Murphy with the lamina of the Kane wallet.

123. Another similar way to have a removable accessory attached is taught by Roman. A POSITA would know that the clip of Roman could be used to attach the wallet to a belt or portion of clothing or could also be used as a money clip. A POSITA would be motivated to use the arrangement shown in Roman as well, which can easily be incorporated with the two lamina structure of the Kane wallet. A POSITA would know how to adjust the dimensions of the clip of Roman and the lamina to successfully integrate the clip of Roman with the lamina of the Kane wallet.

3. Minn

124. As explained in the claim chart in Exhibit B, Minn invalidates all of the Challenged Claims under 35 U.S.C. § 103, in combination with the references shown in the claim chart and the knowledge of a person of ordinary skill in the art.

125. As explained in the chart, a POSITA would be motivated to incorporate several features of the prior art to improve upon the wallet of Minn. As one example, a POSITA would be motivated to make the elastic band 16 out of woven elastic fabric as taught in Preston-Hall to perform reliably in the wallet of Minn. As another example, the groove shown in Podwika would

be desirable to better capture the elastic band 16 in Minn and prevent inadvertent movement of the band. In addition, the laminate structure with a groove capturing an elastic band of Coates with the band free to move as in Minn and Podwika would be desirable to even better capture the elastic band 16 of Minn and protect both sides of the elastic band. A POSITA would also find it desirable to attach the lamina with screws rather than adhesive to allow replacement of one of the lamina (either because it was damaged or to alter the visual appearance of the wallet) or the elastic band itself.

126. A POSITA would also know of prior art wallets that incorporated a removable money clip or other accessory and the desirability of such accessories. A POSITA would be motivated to incorporate the money clip of Beckley into the modified Minn wallet by using a recess between the lamina that are screwed together. This would allow the money clip to be removed when it was desired to use the wallet without the money clip.

127. Another similar way to have a removable accessory attached is taught by Murphy. A POSITA would know that the clip of Murphy could be used to attach the wallet to a belt or portion of clothing or could also be used as a money clip. A POSITA would be motivated to use the arrangement shown in Murphy as well, which can easily be incorporated with the two lamina structure of the modified Minn wallet. A POSITA would know how to adjust the dimensions of the clip of Murphy and the lamina to successfully integrate the clip of Murphy with the lamina of the modified Minn wallet.

X. SECONDARY CONSIDERATIONS OF NON-OBVIOUSNESS

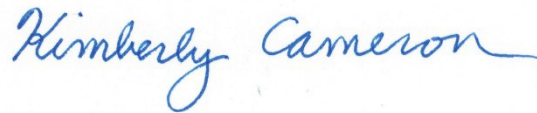
128. I understand that that secondary considerations of non-obviousness are not part of the prima facie obviousness analysis but can be used to rebut allegations of obviousness.

129. To the extent The Ridge Wallet attempts to rely on any secondary considerations of non-obviousness, I reserve the right to address those at a later time.

XI. CONCLUDING REMARKS

130. I understand that any additional rulings regarding claim construction, any change in position on claim construction by the parties, or on receipt of any additional relevant information, may require me to amend or supplement my opinions. I will do so in a timely manner should a response to that additional information, changed position on claim construction, or ruling relevant to claim construction be warranted.

Dated: November 14, 2023



Kimberly K. Cameron, Ph.D.