

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.**

**Before the Honorable Bryan F. Moore
Administrative Law Judge**

In the Matter of:

**CERTAIN COMPACT WALLETES AND
COMPONENTS THEREOF**

Investigation No. 337-TA-1355

**EXPERT REPORT OF KIMBERLY K. CAMERON, PH.D.
REGARDING INVALIDITY OF U.S. PATENT NO. 10,791,808**

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I. LIST OF REPORT APPENDICES AND EXHIBITS

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

Appendix	Description
Appendix A	Kimberly K. Cameron CV
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Appendix F	Exhibit 2 to the Declaration of Scott Kaminski
Appendix G	Exhibit 3 to the Declaration of Scott Kaminski

II. INTRODUCTION

1. This Invalidity Expert Report regarding U.S. Patent No. 10,791,808 (the “’808 patent”) is respectfully submitted in connection with the U.S. International Trade Commission captioned *In the Matter of Certain Compact Wallets and Components Thereof II*, Investigation No. 337-TA-1355. I understand that there is also a district court case in the Central District of California Western Division where the validity of the ’808 Patent is at issue. Case No. 2:20-cv-04556-AB-JC. I have reviewed publicly available materials associated with this case and the validity of the ’808 Patent.

2. I understand that The Ridge Wallet contends that certain claims are infringed by Shenzhen Swztech Co. as shown in the table below.

Asserted Patent	Asserted Claims (Infringement)
U.S. Patent No. 10,791,808	1, 2, 3, 4, 9, 12, 13, 14, 15, 16, 17

3. I also understand that The Ridge Wallet contends it satisfies the technical prong of the domestic industry requirement with other claims as shown below. Collectively, I refer to the claims identified as allegedly infringed and those identified as allegedly satisfying the technical prong of the domestic industry requirement as the “Asserted Claims.”

Asserted Patent	Asserted Claims (Technical Domestic Industry)
U.S. Patent No. 10,791,808	1, 14

4. I have been retained in this matter by Shenzhen Swztech Co.

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

6. I have also been asked to consider other issues related to non-prior art invalidity, as explained below.

7. I reserve the right to modify or supplement my opinions, as well as the basis for my opinions, based on the nature and content of the documentation, data, proof and other evidence or testimony that The Ridge Wallet or its experts may present or based on any additional discovery or other information provided to me or found by me in this matter.

8. I anticipate using as exhibits during trial certain documents and things referenced or cited in this Report or accompanying this Report. I also anticipate using other demonstrative exhibits at trial.

A. Education and Work Experience

9. 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.

10. 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.

11. A complete list of my qualifications is included in my Curriculum Vitae which is attached as Appendix A.

B. Prior Testimony

12. Appendix B includes a list of cases where I have testified as an expert at trial or by deposition within the last four years.

C. Compensation

13. I am a salaried employee of ESi. ESi is being compensated for my time working on this case at my customary rate of \$550 per hour. My compensation is not in any way related to the outcome of the case.

III. SCOPE OF WORK

14. I have reviewed the '808 patent, and the prosecution file history, and references cited therein. I have reviewed publicly available materials of Case No. 2:20-cv-04556-AB-JC that are related to the validity of the '808 Patent. I have also reviewed other prior art documents as discussed below.

15. I was requested to consider issues regarding validity of the Asserted Claims in this matter and specifically address the following topics in this opening Report:

- a. the level of skill of persons who would have worked in the field around the time of the alleged invention;
- b. if the Asserted Claims are invalid as anticipated or obvious;
- c. if the Asserted Claims are invalid for other non-prior art reasons.

16. My work described in detail below involved a comparison of the subject matter recited for the Asserted Claims of the '808 patent and the subject matter described in publications, patents, and systems that predate the earliest priority date The Ridge Wallet Asserted 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 Asserted 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.

17. My detailed analysis for each prior art reference is included in claim charts shown in the table of Exhibits of Section I, specifically, Exhibits A-1, B-1 and C-1.

IV. DOCUMENTS RELIED ON

18. Throughout my analysis, I have relied on my own knowledge and experience, my review of the '808 patent, its prosecution, and my experience analyzing the Accused Products and prior art systems.

19. 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. A list of the materials I reviewed is attached as Appendix C. The "other documents" include, for example, background prior art references relevant to patentability of the Asserted Claims, The Ridge Wallet's complaint and any accompanying charts and exhibits, and charts containing The Ridge Wallet's infringement contentions and technical domestic industry contentions for the '808 patent.

20. I also reviewed information that was generally available to, and relied upon by persons of ordinary skill in the art at the time of the alleged invention, including technical and other reference materials, and information concerning well-known engineering principles practiced by persons of ordinary skill in the art.

21. To support, explain, or otherwise assist with my testimony at trial, I anticipate using some of the documents and information referenced above and throughout this Report, including information and material that has been or may be produced during this Investigation (e.g., deposition testimony), as well as charts, graphs, models, diagrams, or other material based on these documents and information. I affirm that the evidence, reasoning, and conclusions contained in this Report fully represent my own expert opinion to which I would competently testify at deposition and at trial if so called. I understand that expert discovery in this action is ongoing. Therefore, I reserve the right to supplement this Report to address any information obtained, or positions taken, as expert discovery continues.

V. SUMMARY OF OPINIONS

22. After analyzing the prior art references and systems discussed herein, considering the factual record in this Investigation, The Ridge Wallet's application of the Asserted Claims to the Accused Products, 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 Asserted Claims are invalid because they are

anticipated and/or rendered obvious by one or more of the prior art references and systems cited in this Report, which are identified as Exhibits A-1, B-1 and C-1.

23. While it is my opinion that there are no secondary considerations of non-obviousness here, I understand that The Ridge Wallet may argue secondary considerations exist to overcome my opinion that the Asserted Claims are invalid as obvious. To the extent The Ridge Wallet asserts these secondary conditions exist, I reserve the right to supplement my Report and provide a rebuttal opinion on this issue.

VI. RELEVANT LEGAL PRINCIPLES AND GUIDELINES

24. 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

25. 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 asserted patent and prior art.

26. 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.

27. 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.

28. 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.

29. For example, I understand that Daniel Kane, a named inventor of the '808 patent, has a degree in economics with an emphasis in accounting, but by 2017 had at least four years of experience at The Ridge Wallet and at Enclave Mfg Co.

30. 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

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

32. 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.

33. I understand that the Court has issued an Order construing certain claim terms, which I have included as my Appendix D. I have summarized the claims that were construed below and have used these constructions in my analysis below. For terms not specifically construed, I have used the plain and ordinary meaning of those terms in light of the specification.

Claim Term	Construction
“channeling means”	Function: “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 of the dynamic extension and contraction of the band over the entire running length thereof” Structure: “a groove spanning the extent of one or more of the rigid plates or a longitudinal bore through one or more of the rigid plates”
“auxiliary feature” (claim 1, 14)	Plain and ordinary meaning
“undercut” (claims 1, 14)	Plain and ordinary meaning
“hook” (claims 1, 14)	Plain and ordinary meaning
interposed	Plain and ordinary meaning
minimal silhouette	Plain and ordinary meaning
minimize the profile	Plain and ordinary meaning

34. For purposes of my opinions herein, I also considered The Ridge Wallet’s infringement contentions in the charts attached to The Ridge Wallet’s Complaint, as well as The Ridge Wallet’s Supplement to the Complaint served on February 21, 2023. Without opining on

the correctness of The Ridge Wallet's understandings, I have also attempted to use The Ridge Wallet's understandings of the Asserted Claims to form my opinions on the invalidity of the Asserted Claims. Some of my opinions herein, therefore, are based on my understanding of The Ridge Wallet's interpretation and application of the Asserted Claims.

35. If The Ridge Wallet changes its apparent interpretation of the Asserted Claims or offers different interpretations, whether explicitly or implicitly, that affect my conclusions here, I reserve the right to supplement or amend my opinions, including the right to rely on additional prior art not cited in my Report.

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

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

37. 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.

38. 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.

39. 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.

40. 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.

41. I understand that The Ridge Wallet alleges that Asserted Claims 1, 2, 3, 4, 9, 12, 13, 14, 15, 16, and 17 are infringed. 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 Asserted 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 Asserted 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.

42. 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.

43. 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-1, B-1 and C-1 qualify as prior art under the rules discussed above.

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

D. Presumption of Validity

45. I understand that a patent is presumed valid. In granting the '808 patent, some of the references (Podwika, Coates, Minn, and Kane) were considered by the examiner and were used as the basis of rejection of the claims prior to an amendment adding limitations related to an auxiliary feature (as will be discussed in more detail below). Kaminski was disclosed by the applicant to the examiner, but the examiner did not specifically reference or consider Kaminski prior to allowing the '808 patent. Despite The Ridge Wallet's knowledge of the SMCII, it was not disclosed to the Patent Office. Roman was also not disclosed to the Patent Office.

46. I understand that each claim of a patent is to be considered separately in an invalidity analysis.

E. Anticipation

47. I understand that after claim construction, the second step of an invalidity analysis is to determine whether the prior art anticipates an asserted claim under 35 U.S.C. § 102 by comparing the construed claim language to the prior art on a limitation-by-limitation basis.

48. I understand that a patent claim is invalid as anticipated by a single prior art reference if every element of an asserted claim is disclosed, whether expressly or inherently. I also understand that an element is inherently disclosed if it is necessarily present in the reference, regardless of whether or not a person of ordinary skill in the art would have recognized the inherent disclosure at the time of the invention. I further understand that according to the principles of inherency, if the prior art necessarily functions with or includes the element, the prior art discloses that element. Further, it is my understanding that a new scientific explanation for the function of an element that is disclosed in the prior art does not render the element

patentable. Instead, a prior art reference that discloses every element an asserted claim renders the claim invalid.

49. I understand that when a patent claims a composition, product, apparatus, or process in terms of a function, property, or characteristic and the composition of the prior art is the same, but the function is not explicitly disclosed by the prior art, the prior art may still anticipate the claim.

50. I understand that patent claims may be written in means-plus-function form, where the claim limitation is expressed as a means or step for performing an explicit function but where the claim limitation does not state a structure, material, or act in support of the function. I understand that such a claim limitation covers any corresponding structure, material, or acts described in the specification, as well as any equivalents of the structure, material, or act. I also understand that a prior art reference can anticipate a means-plus-function claim limitation when the reference discloses a structure that performs the function recited in the claim limitation and discloses the same structure or an equivalent structure.

F. Obviousness

51. 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.

52. 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.

53. I understand that the following standards, which were provided by the Supreme Court of the United States in *KSR v. Teleflex*,¹ 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.

54. 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.

55. 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

¹ 127 S. Ct. 1727 (2007).

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.

56. 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.

57. 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.

58. 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.

59. 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.

60. 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.

61. 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.

62. 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.

63. 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.

64. 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.

65. 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.

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

67. 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.

68. 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.

69. 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.

G. Claim Construction

70. I understand that the Court has construed several terms as discussed above.

71. If a claim term does not have a final claim construction, 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.

72. 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.

73. 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.

74. I understand that claims define the scope of the asserted 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.

75. 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.

76. 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.

77. 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.

78. 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.

79. 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. But 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.

80. 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.

81. 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.

H. Inequitable Conduct

82. I have been instructed by counsel on the law regarding inequitable conduct, which may render claims of an asserted patent unenforceable. I understand that every applicant for a patent has a duty of candor and good faith in its dealing with the Patent Office. This is important because the Patent Office has limited resources. I understand that when a person involved in the prosecution of an application fails to supply material information or supplies false information or statements and does so with an intent to deceive the Patent Office, he or she may commit what is called “inequitable conduct.” When inequitable conduct occurs during the examination of an application, any patent that issues from that application is unenforceable as a matter of fairness. This means that despite the existence and validity of the patent, the patent holder may not prevent others from using the invention covered by the patent and may not collect damages from those who use the invention that is covered by the patent.

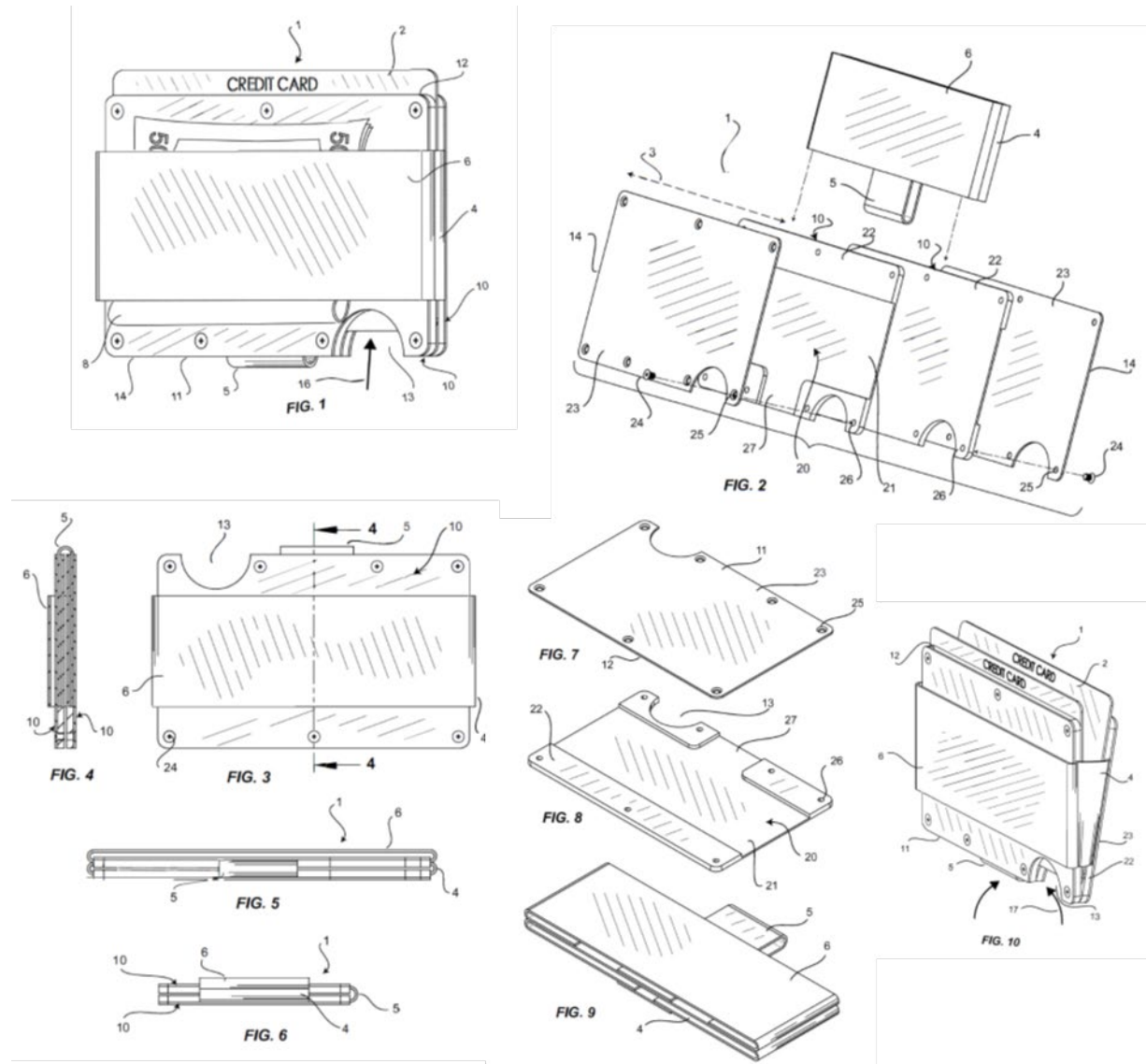
83. I understand that the party challenging a patent must prove by clear and convincing evidence both that a person meaningfully involved in the prosecution of the patent withheld material information or submitted materially false information or statements to the Patent Office during the examination of the patent, and that the person did so with an intent to deceive the Examiner into issuing the patent.

84. I understand that information that was withheld from the Patent Office is material if the Patent Office would not have allowed the claim had it been aware of the withheld information.

VII. BACKGROUND AND OVERVIEW OF THE '808 PATENT

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

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



86. 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.

87. The Asserted Claims were all present in the initial filing of Application No. 14/706,019 with the exception of the following limitation for Claims 1, 2, 3, 4, 9, 12 and 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

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

89. 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.

90. 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:

over Minn in view of Coates et al. (7527081), and further in view of Podwika (5944080). In the alternative, 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 is 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.

5. Claims 14, and 17-18 are rejected under 35 U.S.C. 103 as being unpatentable over Mariano (2322461) in view of Andrews (11348). Mariano teaches a device being an endless cord 2' with two rigid panels each having a longitudinal extend. Mariano teaches that portions 1, 3, and 4 are strung and movable on an endless elastic band. The band is positioned between the two surfaces as noted in fig. 2, where the band is hidden between the two front and back surfaces. Therefore, there must be some kind of groove or channel between the two surfaces in Mariano to accommodate the movement of the elastic band. Andrews teaches a construction that the band can be placed in a groove between the two separate front and back surfaces. Therefore to construct each of portion 1 of two separate portions with a groove in each surface to accommodate the band there between as taught by Andrews would have been obvious.

91. Page 2-3 Final Office Action January 16, 2018.

92. 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.

93. 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.

94. 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.”

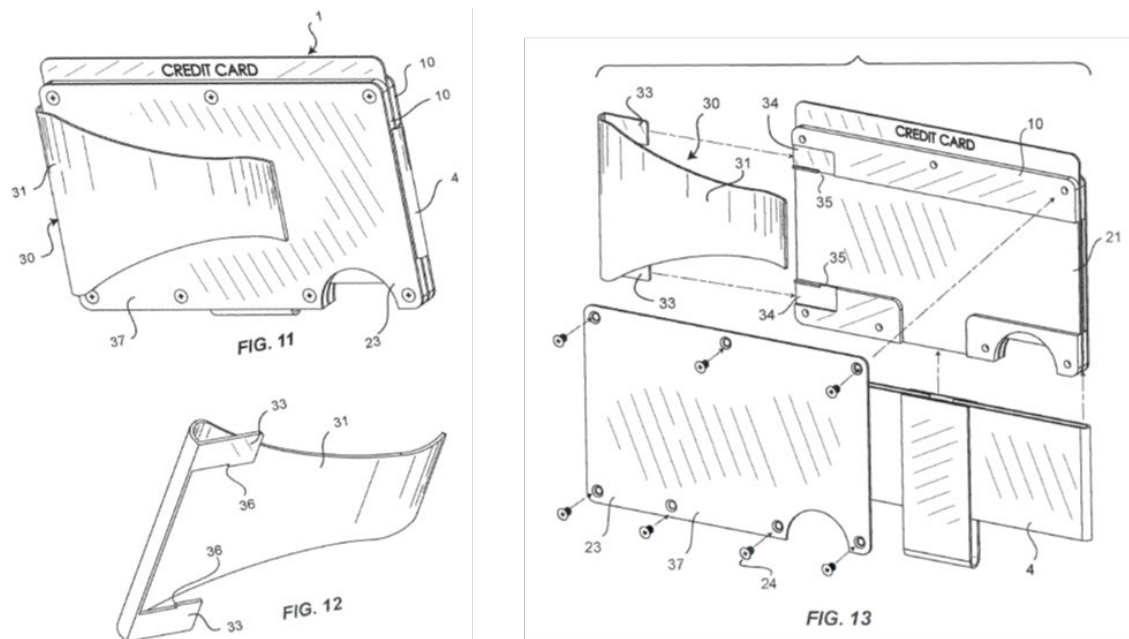
Page 5, October 1, 2018 page 5 December 18, 2018.

95. 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.

96. 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

97. 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.



98. As with the '019 Application, the Asserted Claims were all present in the initial filing of Application No. 14/706,019 with the exception of the following limitation for Claims 1, 2, 3, 4, 9, 12 and 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

99. 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
1-8	Kane

100. In response the applicant added the limitations that were the only ones missing from the Asserted Claims. For Claims 1, 2, 3, 4, 9, 12 and 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 14-17 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

101. 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.

C. Asserted '808 Patent Claims

102. The following claims are asserted 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.
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 cardlike contents from that end.
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 cardlike 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 slidingly 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.

VIII. PRIOR ART INVALIDITY ANALYSIS OF THE '808 PATENT

A. The Ridge Wallet's Claim Interpretations in this Investigation Renders the Asserted Claims Invalid in View of the Prior Art

103. Applying The Ridge Wallet's interpretation of the scope of the Asserted Claims, it is my opinion that all of the Asserted Claims of the '808 patent are invalid in view of the prior art. In performing my analysis, I have applied the standards and legal principles discussed in Section VI above to determine whether the Asserted Claims are invalid under 35 U.S.C. §§ 102 and/or 103.

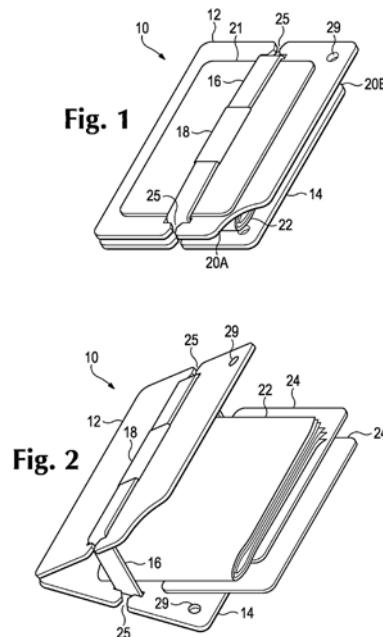
104. In the following sections, I provide an overview of the most relevant prior art references prior to giving a detailed explanation of how the references, alone or in combination, invalidate the Asserted Claims. It is my opinion that the disclosure of each prior art reference would enable a person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

B. Brief Overview of the Prior Art References

1. U.S. Patent 9,125,464 (“Minn”)

105. 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 Asserted Claims.

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



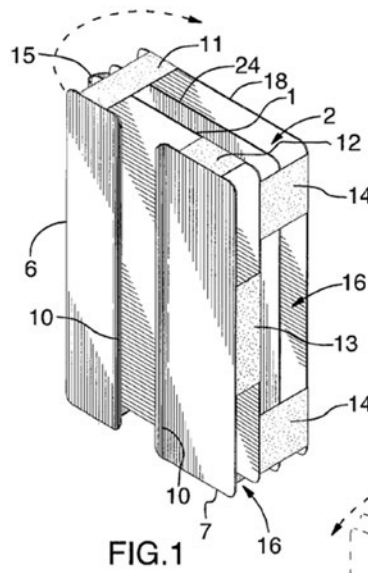
107. Plates 12 and 14, are described as being made from metal and/or carbon fiber, which would make the plates rigid. Minn 2:19-20. Strap 16 is elastic and holds the plates together. *Id.* 2:20-21. Various combinations of money credit cards or other cards can be compressively held between the plates.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

108. Exhibit A-1 describes additional technical features of Minn and demonstrates how those features map to the Asserted Claims.

2. U.S. Patent 7,527,081 (“Coates”)

109. 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 Asserted Claims.

110. 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.



111. 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.

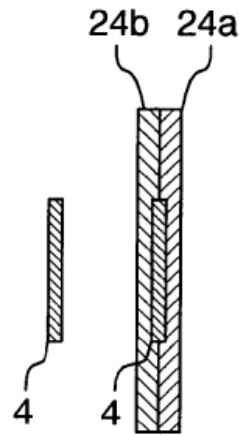


FIG. 13

112. Exhibit A-1 describes additional features of Coates and demonstrates how those features map to the Asserted Claims.

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

113. 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 Asserted Claims.

114. 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.

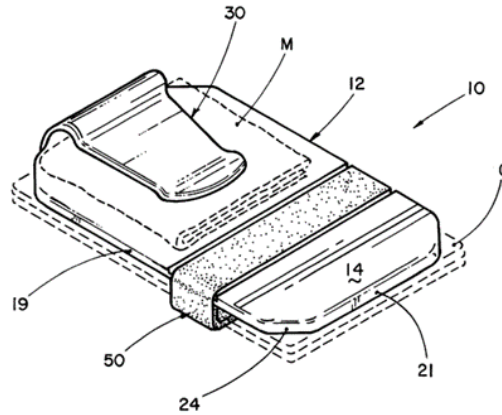


FIG. 1

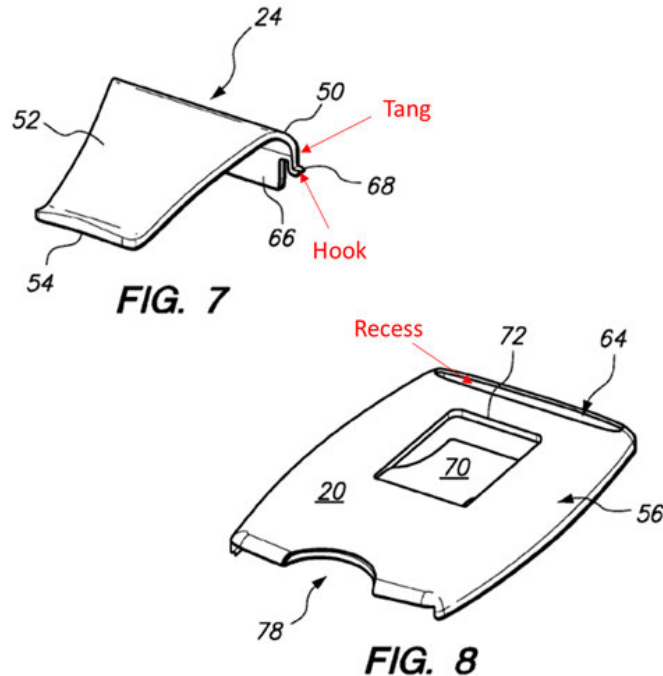
115. As shown in Figure 1, Podwika teaches how to position an elastic band with a groove.

116. Exhibit A-1 describes additional technical features of Podwika and demonstrates how these features map to the Asserted Claims.

4. U.S. Patent 7,334,616 (“Kaminski”)

117. Kaminski was filed on October 12, 2004 and published on April 13, 2006. I understand that Kaminski 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 Asserted Claims.

118. As shown in Figures 7 and 8 below, Kaminski discloses money clip that has a tang that is inserted into retaining channel. The tang has a hook that engages an undercut of the recess.



119. As explained in the specification,

FIGS. 7, 8, 9 and 10 show an embodiment in which money clip 24 is a separate element secured to the holder 10 by a retaining channel 64 molded into the first panel 20. Retaining channels 64 a and 64 b may be molded into each of panels 20 and 22. In FIGS. 7, 8, 9 and 10 retaining channel 64 a in panel 20 and 64 b in panel 22 are molded into the panels during their formation and are configured to be in alignment and to retain mating money clip tab 66 adjacent to the proximal end 50. This configuration increases retention area and provides additional strength to resist bending forces in money clip 24.

In the separate configuration, money clip 24 is added to the assembly as follows: Prior to joining the panels 20 and 22 of the enclosure, clip distal end 54 is inserted through the retainer channel 64 in first panel 20 and pulled through the slot until tab 66 engages in channel 64 a and shoulder 68 engages the interior of the panel at the channel edge. Panels 20 and 22 are then brought together, engaging tab 66 in channel 64 b. Finally, panels 20 and 22 are joined as by being glued or welded together.

U.S. Patent 7,334,616 at 4:16-35

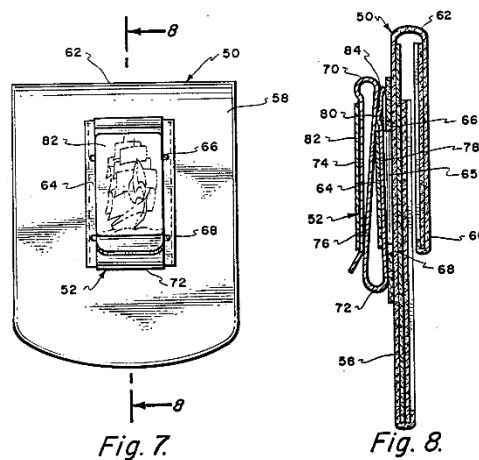
receive the display element. As illustrated, the interior clip portion (11) is designed to match in size and geometry with a flexible clipping element engagement portion of the display element, such as the cavity (9) defined in sleeve (6).

125. Exhibits A-1 and B-1 describe additional technical features of Kaminski and demonstrate how those features map to the Asserted Claims.

6. U.S. Patent 5,103,884 (“Roman”)

126. 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 Asserted Claims.

127. As shown in Figure 1, Roman discloses a wallet with a removable clip.



128. 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

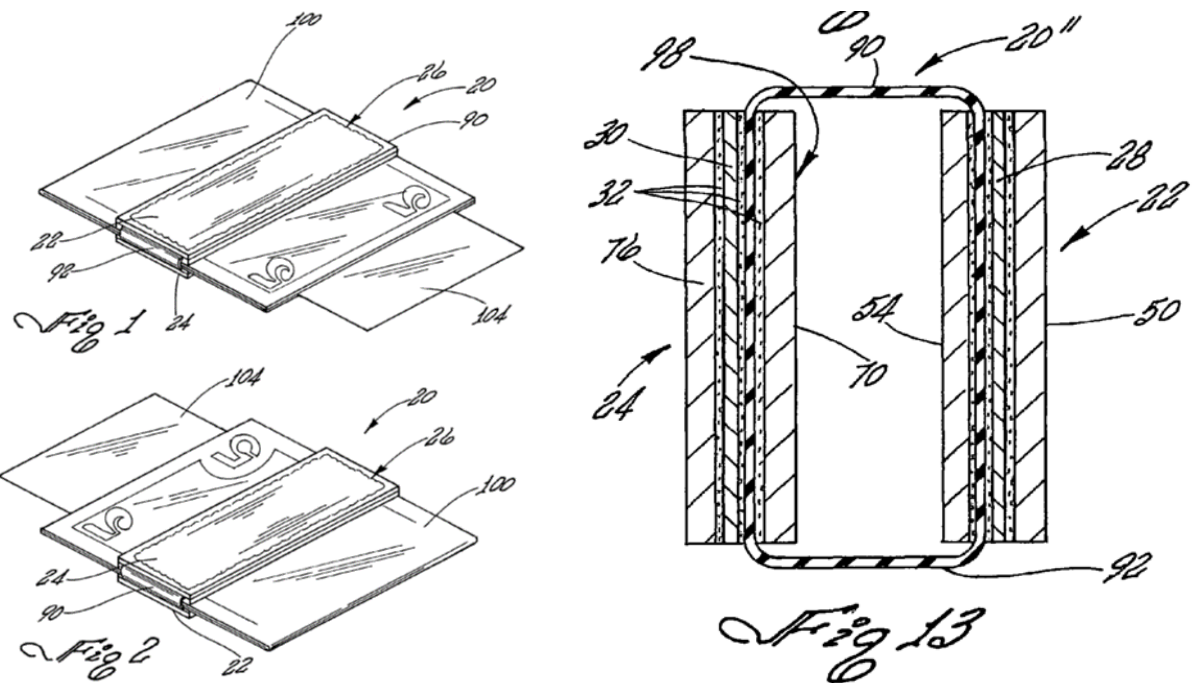
money and credit cards which and is easily accessible without removal from the clipped position.” Roman 1:54-64.

129. Exhibit A-1 and B-1 describe additional technical features of Roman and demonstrates how these features map to the Asserted Claims.

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

130. 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 Asserted Claims.

131. 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.



132. Exhibit A-1 describes additional technical features of Preston-Hall and demonstrates how those features map to the Asserted Claims.

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

133. 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).

134. 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).

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

136. Exhibit B-1 describes additional technical features of Kane and demonstrates how those features map to the Asserted Claims. Kane contains all of the elements of the Asserted

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 inadvertent dislodgement of the auxiliary feature from the recess.

9. Smart Money Clip II (“SMCII”)

137. SMCII is prior art as of 2011 based on an April 23, 2021 declaration from Scott Kaminski that was submitted in Case No. 2:20-cv-04556-AB-JC. I have attached his declaration as Appendix D. Declaration of Scott Kaminski, Case No. 2:20-cv-04556-AB-JC, April 23, 2021. Images of a disassembled view of the product sold in 2011 that were provided as an attachment to the Declaration of Scott Kaminski in Case No. 2:20-cv-04556-AB-JC, April 23, 2021 are attached as my Appendix E. Declaration of Scott Kaminski, Case No. 2:20-cv-04556-AB-JC, April 23, 2021. Copies of several invoices from 2011 that were provided as an attachment to the Declaration of Scott Kaminski in Case No. 2:20-cv-04556-AB-JC, April 23, 2021 are attached as my Appendix F. Declaration of Scott Kaminski, Case No. 2:20-cv-04556-AB-JC, April 23, 2021. A copy of design plans created on October 19, 2012 that were provided as an attachment to the Declaration of Scott Kaminski in Case No. 2:20-cv-04556-AB-JC, April 23, 2021 are attached as my Appendix G. Declaration of Scott Kaminski, Case No. 2:20-cv-04556-AB-JC, April 23, 2021.

138. Exhibit C-1 describes additional technical features of SMCII and demonstrates how those features map to the Asserted Claims.

C. Motivation to Combine References

139. 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.

140. 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.

141. The developers of these references faced similar technical and design challenges and decisions. For example, Murphy is 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 Murray to the issues presented by a clip designed to work with the wallets of the other prior art references discussed.

142. To the extent The Ridge Wallet alleges that one of the primary prior art references discussed herein do not disclose a limitation of the Asserted 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 asserted claim obvious for the reasons stated in this Report and in the accompanying charts.

143. 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.

144. 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.

145. 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.

D. All Asserted Claims of the '808 Patent are Invalid

146. The accompanying charts, A-1, B-1 and C-1 provide examples of where a prior art reference discloses, expressly or inherently, each limitation of the Asserted 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 Investigation, 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.

147. 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.

1. Minn

148. As explained in the claim chart in Exhibit A-1, Minn invalidates all of the Asserted 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.

149. 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.

150. 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 Kaminski into the modified Minn wallet by using a recess as described in Kaminski 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. A POSITA would also know to add a gap in the center of 66 of Kaminski to accommodate the elastic band 16.

151. 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.

2. Kane

152. As explained in the claim chart in Exhibit B-1, Kane invalidates the Asserted 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.

153. As shown in the claim chart, Kane contains all of the elements of the Asserted 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.

154. 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 Kaminski into the Kane wallet by using a recess as described in Kaminski 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. A POSITA would also know to add a gap in the center of 66 of Kaminski to accommodate the elastic band 16.

155. 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.

3. SMCII

156. As explained in the claim chart in Exhibit C-1, SMCII invalidates the Asserted Claims under 35 U.S.C. § 102 or 35 U.S.C. § 103 in combination with the skill of a person of ordinary skill in the art.

IX. SECONDARY CONSIDERATIONS OF NON-OBVIOUSNESS

157. 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.

158. 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.

X. INEQUITABLE CONDUCT MATERIALITY ANALYSIS

159. I have been asked to analyze whether the disclosure of the SMCII and materials from the district court case would have been material to the patentability of the '596 application. As discussed below, it is my opinion that the SMCII and materials from the district court case are material to the patentability of the Asserted Claims and therefore should have been disclosed to the Patent Office.

160. As I stated above and based on my experience as a patent agent, I understand that inventors and prosecuting attorneys are required to follow a duty of candor when interacting with the Patent Office, which includes a duty to disclose information material to patentability. I understand that M.P.E.P. § 2001.06(c) requires that litigation materials involving the subject matter of the application must be brought to the attention of the examiner during prosecution.

161. The '808 patent did not issue until October 6, 2020. Prior to this date, the SMCII and related materials were disclosed during the district court litigation yet these materials were not disclosed to the Patent Office.

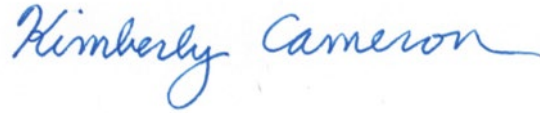
162. It is my opinion that the SMCII and related materials from the district court litigation constitute material information related to the subject matter of the '596 application. The district court judge found that this information was material. None of this information, which is material to the patentability of the Asserted Claims, was disclosed to the Patent Office.

XI. CONCLUDING REMARKS

163. I understand that any additional rulings regarding claim construction, any change in position on claim construction by the parties, including an apparent change in claim construction by application of the claims to accused products or products relied on by the Complainant in support of any domestic industry contentions, 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: August 25, 2023



Kimberly K. Cameron, Ph.D.

Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 (“Minn”)

Prior Art Publication

As described in the following claim chart, all asserted claims of U.S. Patent No. 10,791,808 (“the ’808 Patent”) are obvious over US 9,125,464 (“Minn”) in combination with the knowledge of a person of ordinary skill in the art and/or other prior art references as detailed in the following chart, for the reasons explained in the chart.

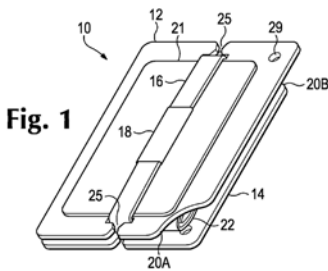
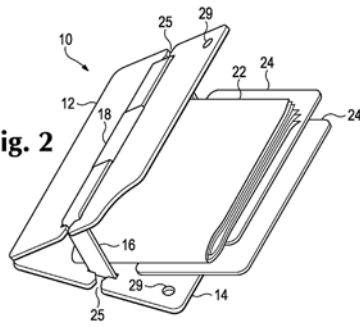
The other prior art references used in the various combinations below include U.S. Patent No. 5,944,080 (“Podwika”), U.S. Patent 7,527,081 (“Coates”), U.S. Patent 7,334,616 (“Kaminski”), U.S. Patent Application Publication 2006/0010661 (“Murphy”), U.S. Patent 5,103,884 (“Roman”), U.S. Patent 8,381,360 (“Preston-Hall”).

The asserted claims of the ’808 Patent are obvious in view of Podwika in combination with other prior art references in the following chart, for the reasons explained in the chart.

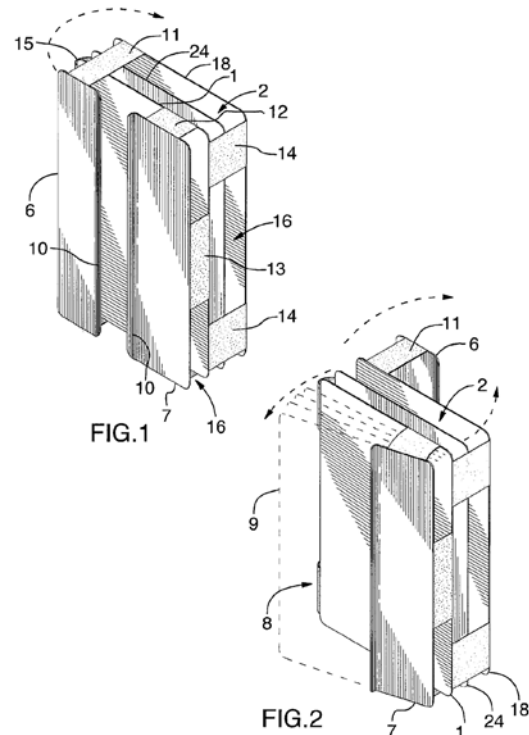
The identification of claim elements within Minn and/or other references in the following chart is based in whole or in part on my present understanding of the Asserted Claims and on Complainant’s apparent construction or interpretation of the claims. By identifying where claim elements reside in Podwika and/or other references in the following chart that would render obvious claims based on Complainant’s apparent construction or any other particular claim construction, it does not follow that I adopt or concur with Complainant’s allegations or constructions.

Minn was filed on March 13, 2013 and published on April 19, 2012. Minn is prior art under AIA §§ 102(a)(1) or (2).

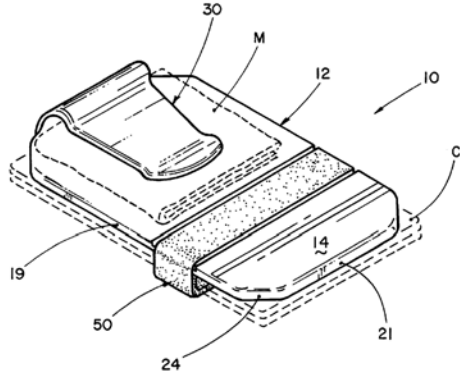
Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. No.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
1pre	A compact wallet, comprising:	Minn discloses a compact wallet as in Figure 1 and Figure 2:  Fig. 1  Fig. 2 Coates also discloses a compact wallet as in Figures 1 and 2:

Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 FIG. 1 FIG. 2 Podwika also discloses a compact wallet as in Figure 1:

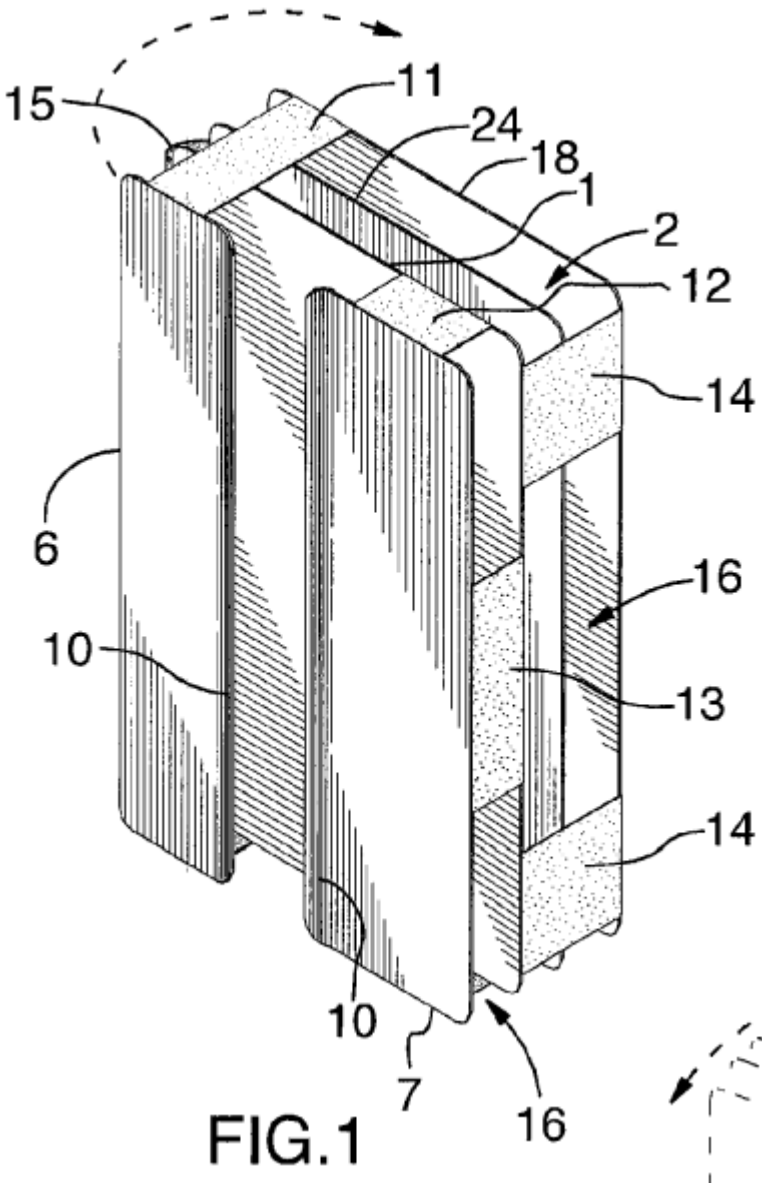
Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 FIG. 1 “The present invention relates generally to money clips and the like, and more specifically the present invention relates to devices for holding money and cards.” Podwika 1:9-11 “It is another object of the invention to provide a holder for cards and paper money which is compact when filled with varying amounts of cards and money.” Podwika 2:27-29
1a	at least two rigid plates interposed to sandwich cardlike contents there between, each rigid plate having a longitudinal extent;	Minn discloses two rigid plates with longitudinal extents interposed to sandwich cardlike contents:

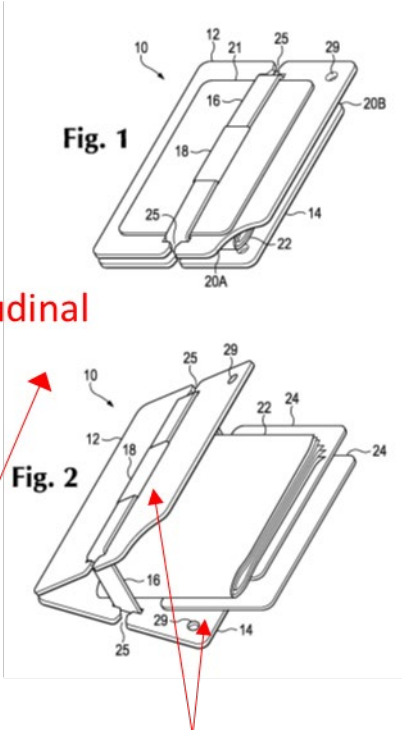
Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		Fig. 1 Fig. 2 Longitudinal extent Rigid plates “Referring to FIGS. 1-4, a low profile wallet 10 comprises two metal and/or carbon fiber plates 12 and 14 held together with an elastic strap 16. Personal items, such as paper money 22, credit cards 24, driver's license, identification cards, membership cards, business cards, or the like, or any combination thereof may be compressively held in-between plates 12 and 14.” Minn 2:19-25.

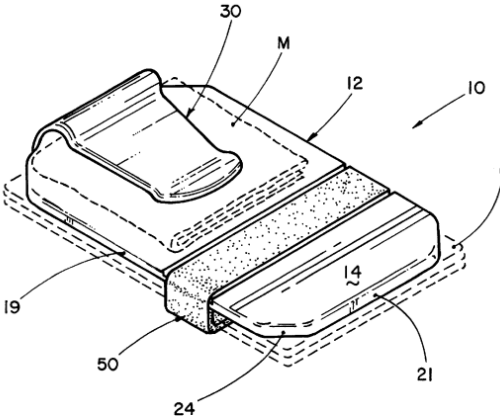
Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 FIG. 1

Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
1b	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;	Minn discloses this element as seen in Fig.1 and Fig. 2 and the associated description.  Fig. 1 Fig. 2 Longitudinal extent Rigid plates “Referring to FIGS. 1-4, a low profile wallet 10 comprises two metal and/or carbon fiber plates 12 and 14 held together with an elastic strap 16. Personal items, such as paper money 22, credit cards 24, driver's license, identification cards,

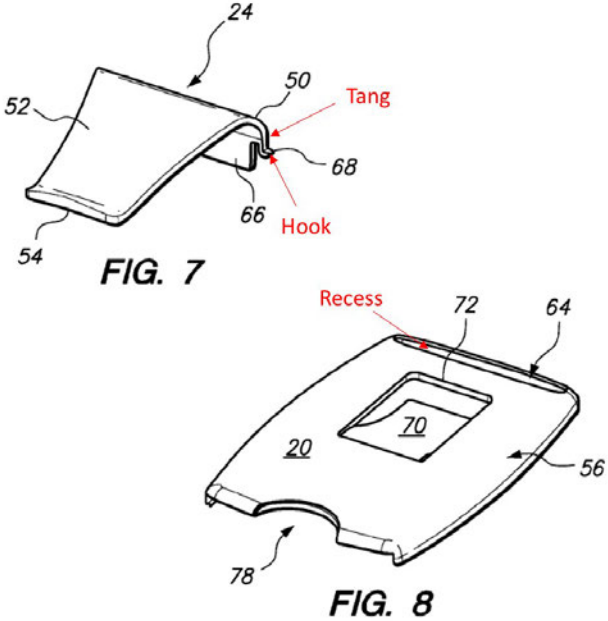
Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		membership cards, business cards, or the like, or any combination thereof may be compressively held in-between plates 12 and 14." Minn 2:19-25.
1c	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,	Minn modified with the groove of Podwika discloses a channeling means. FIG. 1 of Podwika illustrates that the elastic band can be captured by a longitudinal groove in each plate instead of by slots 25 and notches 28 taught in Minn. This would be desirable to minimize the profile of the wallet. Like Minn and Podwika, the combination of Minn and Podwika also allows freedom for the dynamic extension and contraction of the band over the entire running length. The groove of Podwika is shown below in FIG. 1 of Podwika.  FIG. 1 As explained in Podwika, the recess 26 is sized and configured to receive a portion of an elastic retaining band 50. The elastic retaining band 50 is formed into a continuous loop that encircles the base 12. A POSITA would be motivated to utilize this over the longitudinal extent of the rigid plates of Minn in place of slots 25 and notches 28 of Minn.

Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		Furthermore, based on Coates, instead of being exposed, the groove could be made between two lamina as seen in Figure 13 where 24a and 24b are the lamina of the rigid plate and 4 is the elastic band: FIG.13 While Coates teaches that the lamina can be attached by adhesive, a POSITA would be motivated to instead attach the laminas by screws and have the band not attached with adhesive as in Podwika to allow replacement of the elastic band or the outer lamina (additionally for changing the visual appearance as described in Minn 2:51-56). As also noted by the Patent Office, "Coates teaches other fasteners, it would have been obvious to one of ordinary skill in the art to provide screws or adhesive attaching the two plates." September 19, 2018 Office Action, '596 Prosecution History.

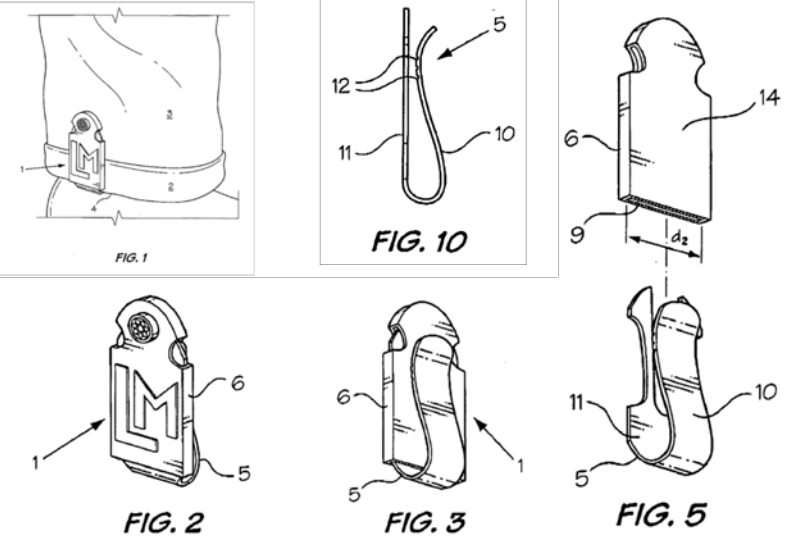
Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
1d	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,;	The money clip of Kaminski or clip of Murphy discloses this element. Kaminski discloses this element in FIG. 7 and FIG. 8. A POSITA would be motivated to add a feature such as a money clip to the outside of the compact wallet for easier access to content that is easily viewable.  “FIGS. 7, 8, 9 and 10 show an embodiment in which money clip 24 is a separate element secured to the holder 10 by a retaining channel 64 molded into the first panel 20. Retaining channels 64 a and 64 b may be molded into each of panels 20 and 22. In FIGS. 7, 8, 9 and 10 retaining channel 64 a in

Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		panel 20 and 64 b in panel 22 are molded into the panels during their formation and are configured to be in alignment and to retain mating money clip tab 66 adjacent to the proximal end 50. This configuration increases retention area and provides additional strength to resist bending forces in money clip 24. In the separate configuration, money clip 24 is added to the assembly as follows: Prior to joining the panels 20 and 22 of the enclosure, clip distal end 54 is inserted through the retainer channel 64 in first panel 20 and pulled through the slot until tab 66 engages in channel 64 a and shoulder 68 engages the interior of the panel at the channel edge. Panels 20 and 22 are then brought together, engaging tab 66 in channel 64 b. Finally, panels 20 and 22 are joined as by being glued or welded together. U.S. Patent 7,334,616 at 4:16-35. A POSITA would be motivated to add the option of the functionality of an accessory such as a money clip and incorporate the money clip of Kaminski and the corresponding recess with an undercut on the lamina construction. To accommodate the elastic band, a POSITA would know to provide a gap in the center of 66. A POSITA would also be familiar with the use of removable clips for wallets. One example in the prior art is shown in U.S. Patent No. 5,103,884 Fig. 9. A POSITA would be motivated to have the clip be removable and this would be an additional reason to use screws rather than glue or welding to attach the lamina together (in addition to being able to replace the outer lamina and or band).

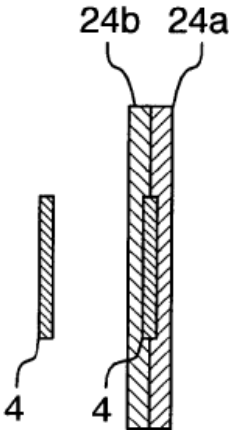
Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		Another example of a removable clip that uses two tangs with a hook at an angle to engage an undercut of a recess is shown in U.S. Patent Application Publication 2006/0010661 ("Murphy").  While the clip of Murphy is shown as clipping to the cuff of a pant leg (that can have variable thickness), the clip 10 is similar to that used for a money clip or a clip that could attach a wallet to a belt for example. A POSITA would also be motivated to use the tang and hook arrangement to secure a removable clip or accessory to the wallet (the combination described above). In addition, the abstract describes the invention as "[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.

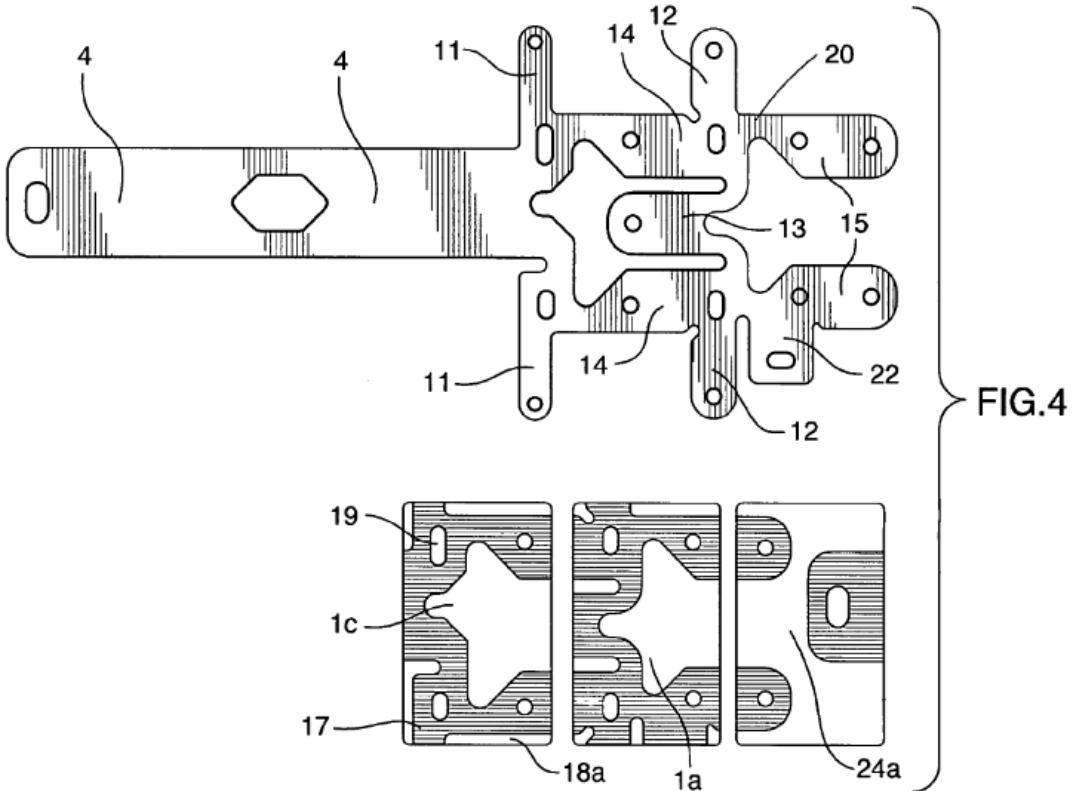
Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		In the wallet that has the groove of Podwika in the laminate structure of Coates, a POSITA wanting to add a removable clip could incorporate any of the clips or their combinations as discussed above.
1e	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.,	The combination discussed results in this limitation. The groove of Podwika minimized the silhouette and does not adversely affect the already present expandable capacity and ready access of Minn. It is another object of the invention to provide a holder for cards and paper money which is compact when filled with varying amounts of cards and money. It is a further object of the invention to provide a holder for cards which can retain a plurality of cards equally as well as it can retain a Single card. Podwika 2:27-33
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.	As discussed, the combination that utilizes the groove of Pokwika with the laminate construction of Coates (attached with screws rather than adhesive) contains this element. The elastic band is shown in FIG. 13 and FIG. 4 as 4 and the lamina are 24a and 24b.

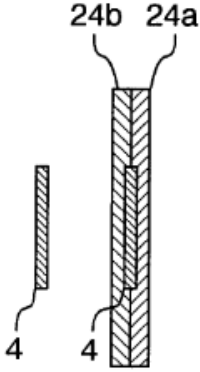
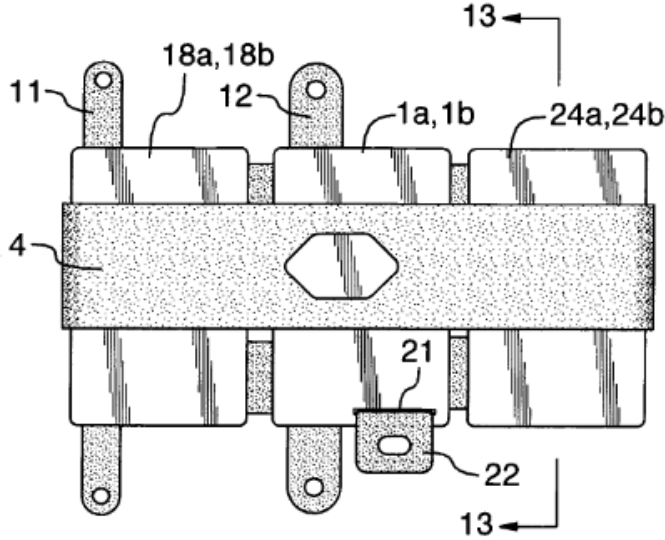
Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 FIG.13

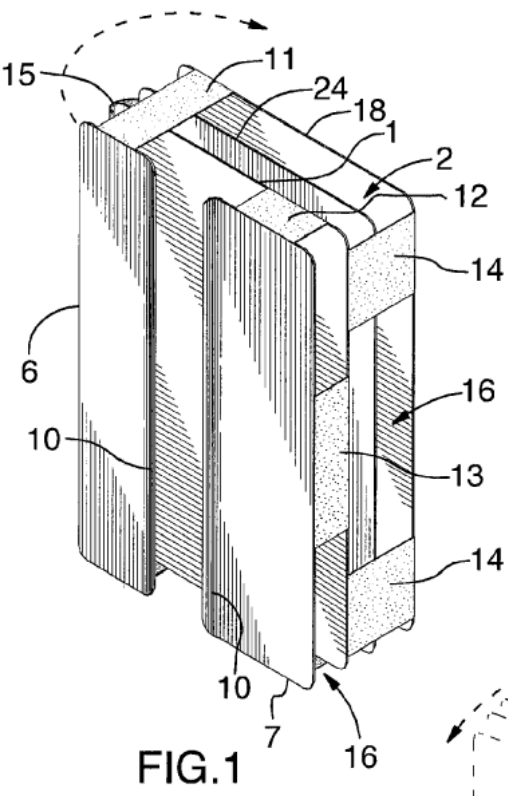
Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		
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	

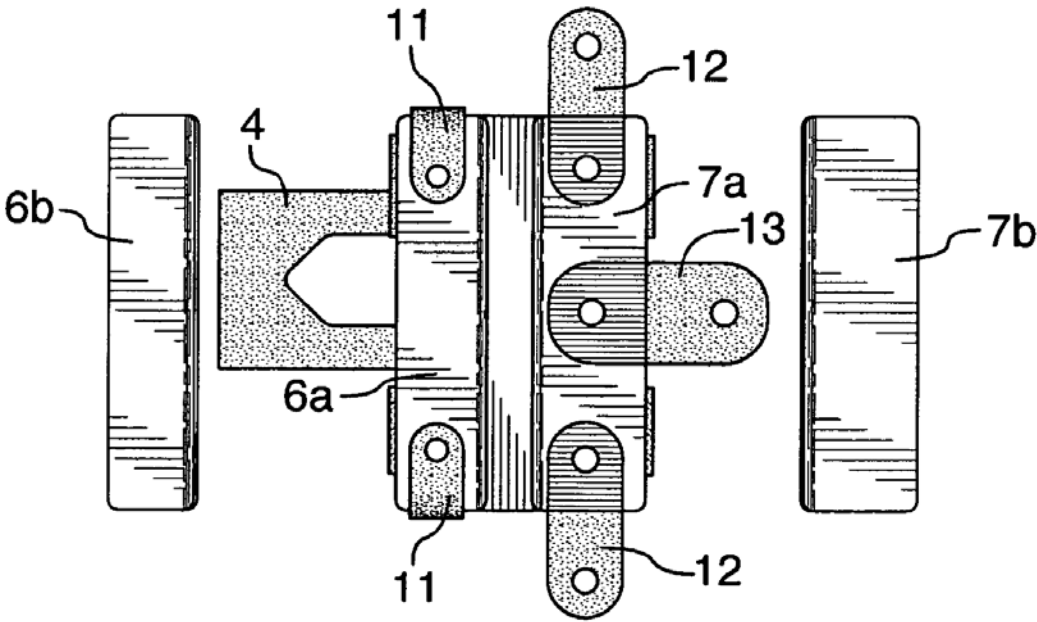
Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 FIG. 13  FIG. 7 As discussed, a POSITA would use screws in the combination discussed to attach the lamina in order to allow replacement of the elastic band or outer lamina (for example for damage or simply for changing the appearance). The second lamina holds the band in place and provides a smooth glide surface.
4	The compact wallet of claim 3, wherein the second lamina is attached to the first lamina by screws.	As discussed, a POSITA would use screws in the combination discussed to attach the lamina in order to allow replacement of the elastic band or outer lamina (for example for damage or simply for changing the appearance). As also noted by the Patent Office, "Coates teaches other fasteners, it would have been obvious to one of ordinary skill in the art to provide screws or

Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		adhesive attaching the two plates." September 19, 2018 Office Action, '596 Prosecution History.
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 cardlike contents from that end.	A POSITA would be motivated to incorporate an elastic strap as claimed as taught by Coates to retain the cardlike contents.  FIG. 1

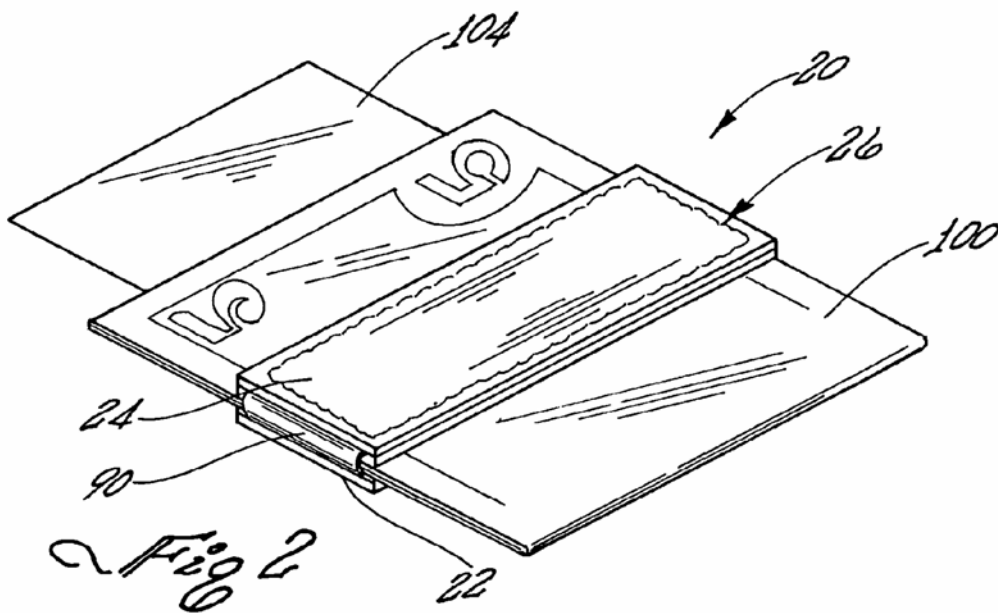
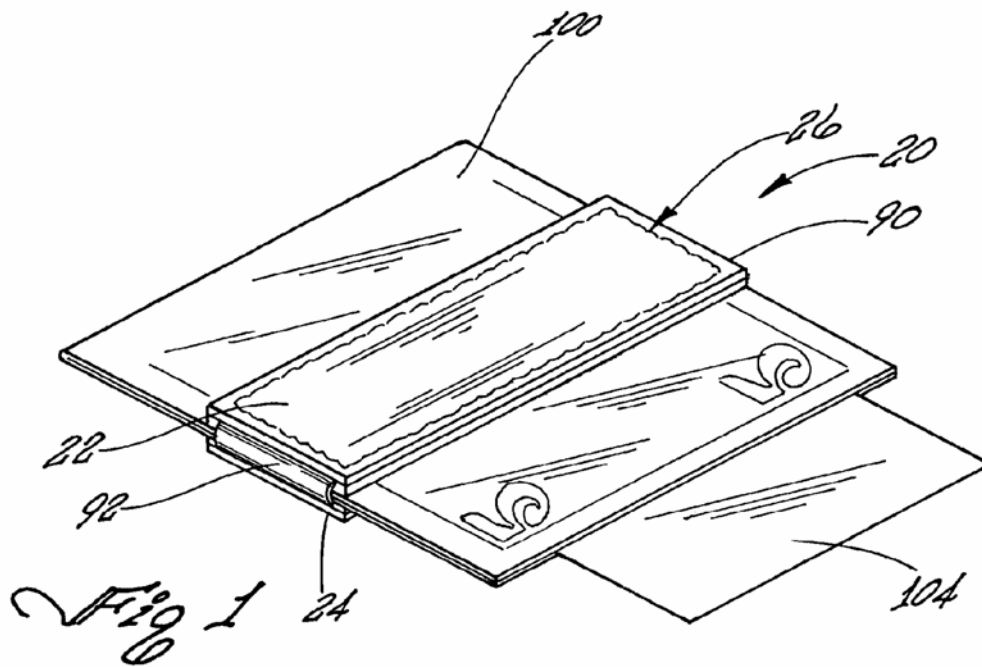
Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 FIG. 8
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	Minn has aligned notches. The other part of the claim is an intended use and is not limiting. In addition, it was known that aligned notches can be used to

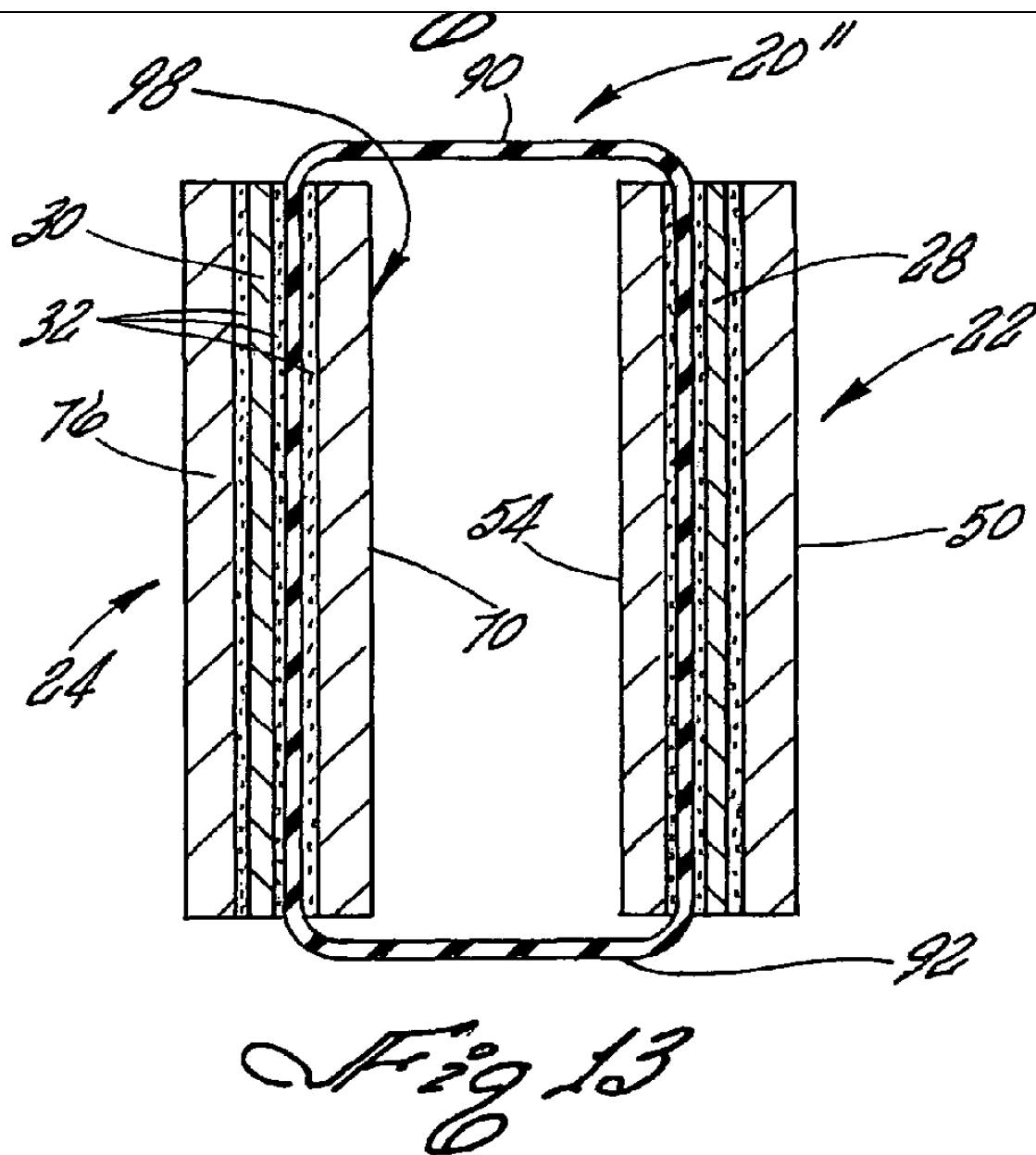
Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
	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	It would have been obvious to make the band of woven elastic as taught by Preston-Hall. 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.

Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")



Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")



Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
14pre	A compact wallet, comprising:	Minn, Podwika & Coates are all compact wallets
14a	at least two rigid plates interposed to sandwich cardlike contents there between, each rigid plate having a groove along a longitudinal extent thereof,	Minn discloses two rigid plates with longitudinal extents interposed to sandwich cardlike contents: The image contains two perspective drawings of a wallet, labeled Fig. 1 and Fig. 2. Fig. 1 shows the wallet with an elastic strap (16) holding two rigid plates (12 and 14) together. Cardlike contents (22) are sandwiched between the plates. Fig. 2 shows the wallet with the strap (16) removed, revealing the internal structure. Red arrows point to the 'Longitudinal extent' of the plates and the 'Rigid plates' themselves. Various components are labeled with numbers: 10 (wallet), 12 (plate), 14 (plate), 16 (strap), 18 (groove), 20A and 20B (edges), 21 (strap end), 22 (card), 24 (card), 25 (strap end), 29 (strap end). “Referring to FIGS. 1-4, a low profile wallet 10 comprises two metal and/or carbon fiber plates 12 and 14 held together with an elastic strap 16. Personal items, such as paper money 22, credit cards 24, driver's license, identification cards,

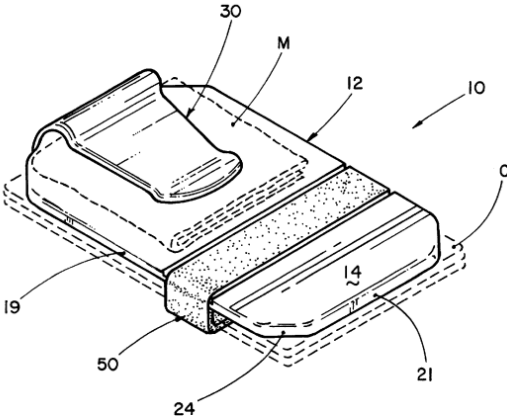
Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		membership cards, business cards, or the like, or any combination thereof may be compressively held in-between plates 12 and 14." Minn 2:19-25. Minn modified with the groove of Podwika discloses a channeling means. FIG. 1 of Podwika illustrates that the elastic band can be captured by a longitudinal groove in each plate instead of by slots 25 and notches 28 taught in Minn. This would be desirable to minimize the profile of the wallet. Like Minn and Podwika, the combination of Minn and Podwika also allow freedom for the dynamic extension and contraction of the band over the entire running length. The groove of Podwika is shown below in FIG. 1 of Podwika. FIG. 1 As explained in Podwika, the recess 26 is sized and configured to receive a portion of an elastic retaining band 50. The elastic retaining band 50 is formed into a continuous loop that encircles the base 12. A POSITA would be motivated to utilize this over the longitudinal extent of the rigid plates of Minn in place of slots 25 and notches 28 of Minn.

Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		Furthermore, based on Coates, instead of being exposed, the groove could be made between two lamina as seen in Figure 13 where 24a and 24b are the lamina of the rigid plate and 4 is the elastic band: FIG.13 While Coates teaches that the lamina can be attached by adhesive, a POSITA would be motivated to instead attach the laminas by screws to allow replacement of the elastic band or the outer lamina (additionally for changing the visual appearance as described in Minn 2:51-56). As also noted by the Patent Office, "Coates teaches other fasteners, it would have been obvious to one of ordinary skill in the art to provide screws or adhesive attaching the two plates." September 19, 2018 Office Action, '596 Prosecution History.

Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
14b	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	Minn modified with the groove of Podwika discloses a channeling means. FIG. 1 of Podwika illustrates that the elastic band can be captured by a longitudinal groove in each plate instead of by slots 25 and notches 28 taught in Minn. This would be desirable to minimize the profile of the wallet. Like Minn and Podwika, the combination of Minn and Podwika also allow freedom for the dynamic extension and contraction of the band over the entire running length. The groove of Podwika is shown below in FIG. 1 of Podwika.  FIG. 1 As explained in Podwika, the recess 26 is sized and configured to receive a portion of an elastic retaining band 50. The elastic retaining band 50 is formed into a continuous loop that encircles the base 12. A POSITA would be motivated to

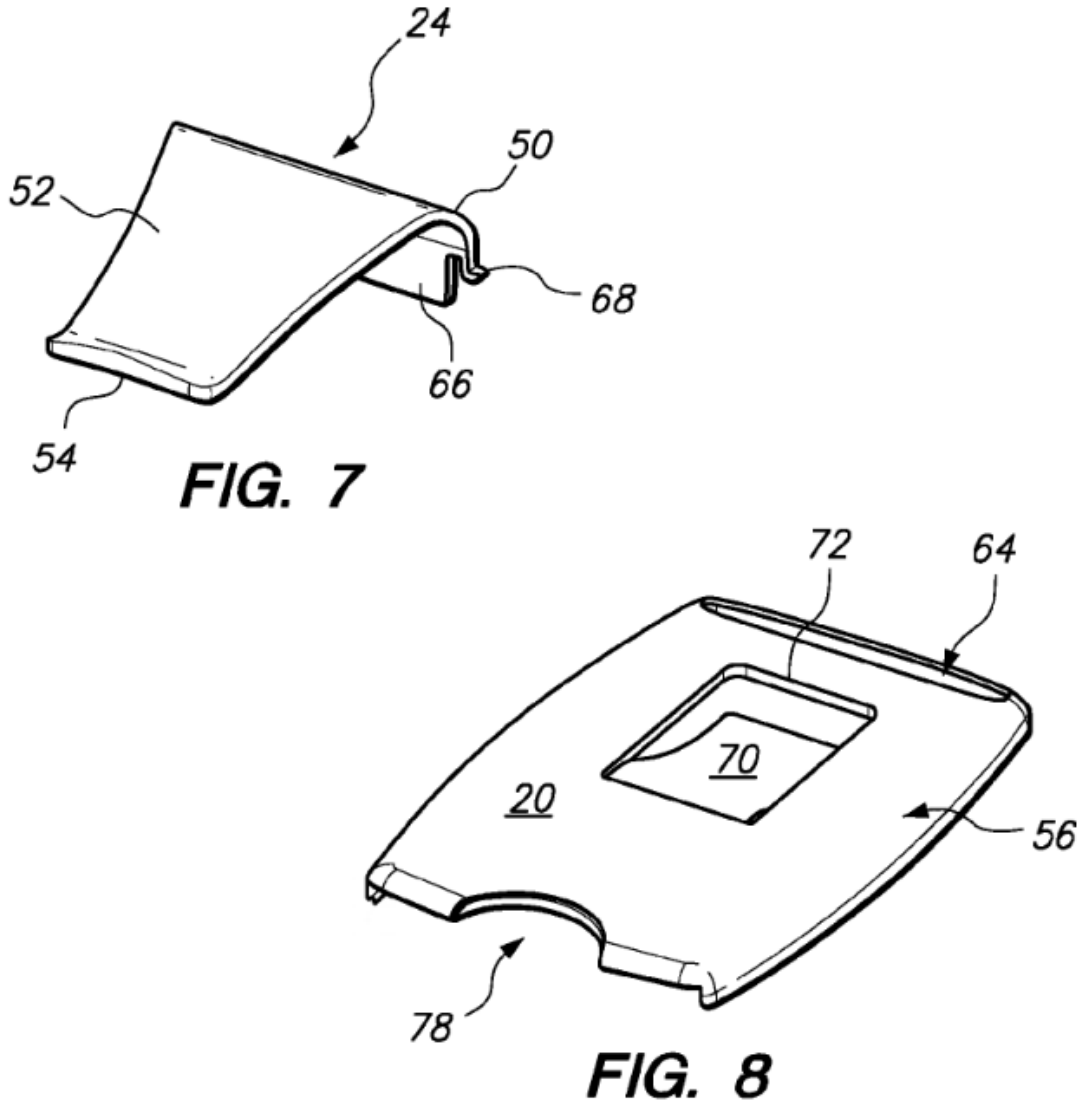
Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		utilize this over the longitudinal extent of the rigid plates of Minn in place of slots 25 and notches 28 of Minn. Furthermore, based on Coates, instead of being exposed, the groove could be made between two lamina as seen in Figure 13 where 24a and 24b are the lamina of the rigid plate and 4 is the elastic band: FIG.13 While Coates teaches that the lamina can be attached by adhesive, a POSITA would be motivated to instead attach the laminas by screws to allow replacement of the elastic band or the outer lamina (additionally for changing the visual appearance as described in Minn 2:51-56).

Ex. A

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
14c	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,	The money clip of Kaminski or clip of Murphy discloses this element. Kaminski discloses this element in FIG. 7 and FIG. 8. A POSITA would be motivated to add a feature such as a money clip to the outside of the compact wallet for easier access to content that is easily viewable. FIG. 7 FIG. 8

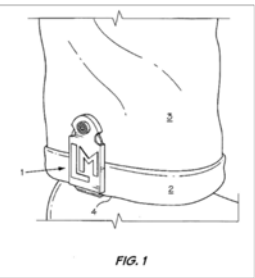
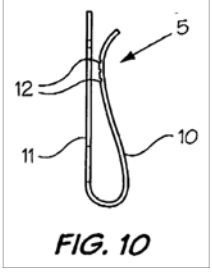
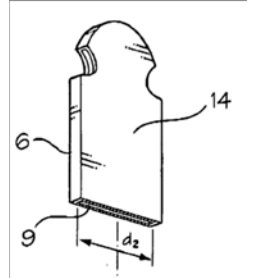
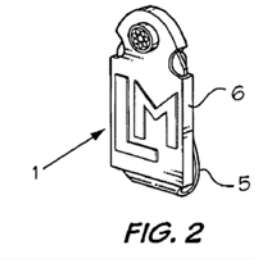
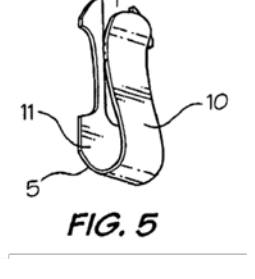
Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 FIG. 7 is a perspective view of a wallet component 24. It features a main body 52 with a top edge 50 and a bottom edge 54. A flap 66 is attached to the side of the body, and a small protrusion 68 is located at the end of the flap. FIG. 8 is a perspective view of a wallet component 20. It has a rectangular shape with rounded corners. A central rectangular opening 70 is defined by a raised border 72. The outer edges of the wallet are labeled 64 and 56. A small notch or cutout 78 is visible on one of the shorter edges.

Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		“FIGS. 7, 8, 9 and 10 show an embodiment in which money clip 24 is a separate element secured to the holder 10 by a retaining channel 64 molded into the first panel 20. Retaining channels 64 a and 64 b may be molded into each of panels 20 and 22. In FIGS. 7, 8, 9 and 10 retaining channel 64 a in panel 20 and 64 b in panel 22 are molded into the panels during their formation and are configured to be in alignment and to retain mating money clip tab 66 adjacent to the proximal end 50. This configuration increases retention area and provides additional strength to resist bending forces in money clip 24. In the separate configuration, money clip 24 is added to the assembly as follows: Prior to joining the panels 20 and 22 of the enclosure, clip distal end 54 is inserted through the retainer channel 64 in first panel 20 and pulled through the slot until tab 66 engages in channel 64 a and shoulder 68 engages the interior of the panel at the channel edge. Panels 20 and 22 are then brought together, engaging tab 66 in channel 64 b. Finally, panels 20 and 22 are joined as by being glued or welded together. U.S. Patent 7,334,616 at 4:16-35. A POSITA would be motivated to add the option of the functionality of an accessory such as a money clip and incorporate the money clip of Kaminski and the corresponding recess with an undercut on the lamina construction. To accommodate the elastic band, a POSITA would know to provide a gap in the center of 66. A POSITA would also be familiar with the use of removable clips for wallets. One example in the prior art is shown in U.S. Patent No. 5,103,884 Fig. 9. A POSITA would be motivated to have the clip be removable and this would be an additional reason to use screws rather than glue or welding to attach the

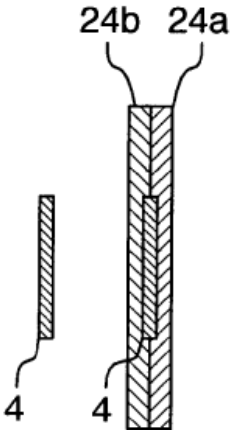
Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		lamina together (in addition to being able to replace the outer lamina and or band). Another example of a removable clip that uses two tangs with a hook at an angle to engage an undercut of a recess is shown in U.S. Patent Application Publication 2006/0010661 ("Murphy").       While the clip of Murphy is shown as clipping to the cuff of a pant leg (that can have variable thickness), the clip 10 is similar to that used for a money clip or a clip that could attach a wallet to a belt for example. A POSITA would also be motivated to use the tang and hook arrangement to secure a removable clip or accessory to the wallet (the combination described above). In addition, the abstract describes the invention as "[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.

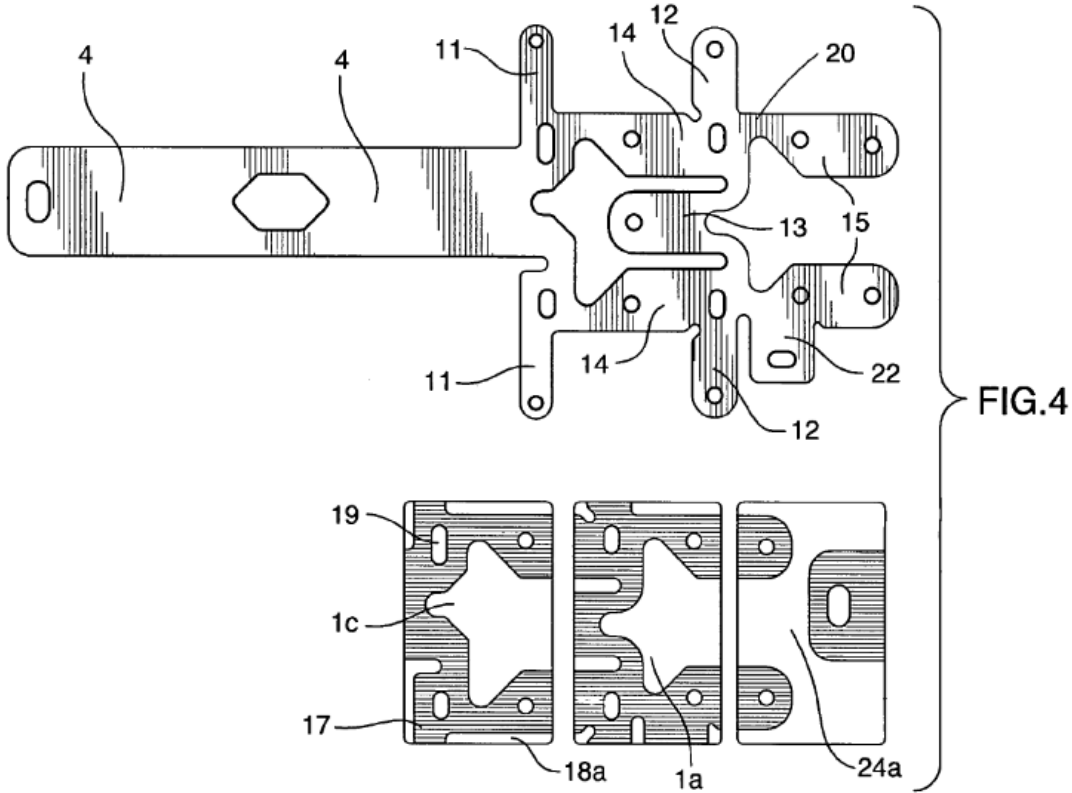
Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		In the wallet that has the groove of Podwika in the laminate structure of Coates, a POSITA wanting to add a removable clip could incorporate any of the clips or their combinations as discussed above.
14d	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.	The combination discussed results in this limitation. The groove of Podwika minimized the silhouette and does not adversely affect the already present expandable capacity and ready access of Minn. It is another object of the invention to provide a holder for cards and paper money which is compact when filled with varying amounts of cards and money. It is a further object of the invention to provide a holder for cards which can retain a plurality of cards equally as well as it can retain a Single card. Podwika 2:27-33
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	As discussed, the combination that utilizes the groove of Pokwika with the laminate construction of Coates (attached with screws rather than adhesive) contains this element. The elastic band is shown in FIG. 13 and FIG. 4 as 4 and the lamina are 24a and 24b.

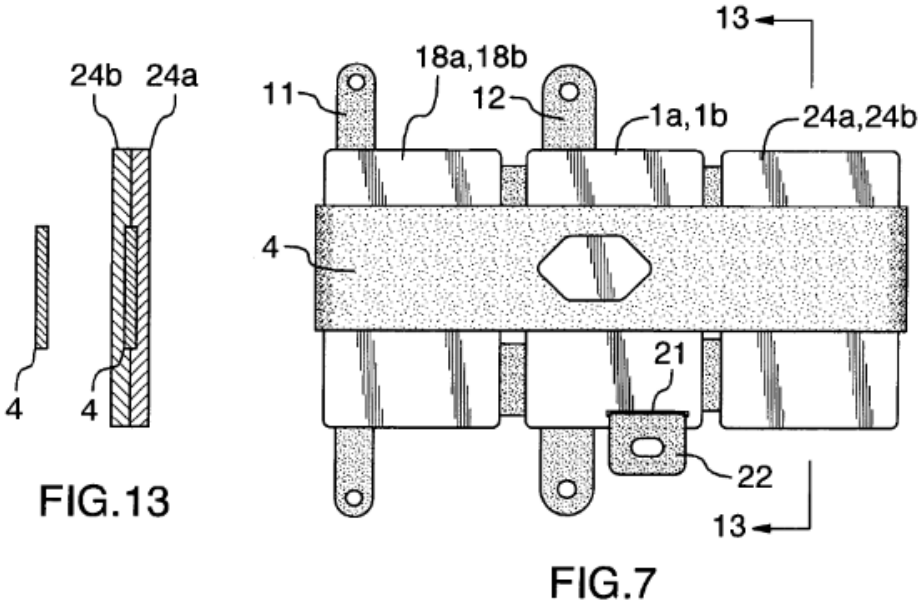
Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 FIG.13 As also noted by the Patent Office, "Coates teaches other fasteners, it would have been obvious to one of ordinary skill in the art to provide screws or adhesive attaching the two plates." September 19, 2018 Office Action, '596 Prosecution History.

Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		
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	

Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 ("Minn")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 FIG. 13 FIG. 7 Coates FIG. 13 and FIG. 7 As discussed, a POSITA would use screws in the combination discussed to attach the lamina in order to allow replacement of the elastic band or outer lamina (for example for damage or simply for changing the appearance). The second lamina holds the band in place and provides a smooth glide surface.
17	The compact wallet of claim 16, wherein the second lamina is attached to the first lamina by screws	As discussed, a POSITA would use screws in the combination discussed to attach the lamina in order to allow replacement of the elastic band or outer lamina (for example for damage or simply for changing the appearance).

Ex. A
Comparison of U.S. Patent No. 10,791,808 and US 9,125,464 (“Minn”)

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		As also noted by the Patent Office, “Coates teaches other fasteners, it would have been obvious to one of ordinary skill in the art to provide screws or adhesive attaching the two plates.” September 19, 2018 Office Action, '596 Prosecution History.

Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 (“Kane”)

Prior Art Publication

As described in the following claim chart, all asserted claims of U.S. Patent No. 10,791,808 (“’808 Patent”) are invalid in view of Kickstarter The Ridge Wallet 2.0 (“Kane”) in view of the knowledge of a person of ordinary skill in the art and the references as detailed below.

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) and
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).

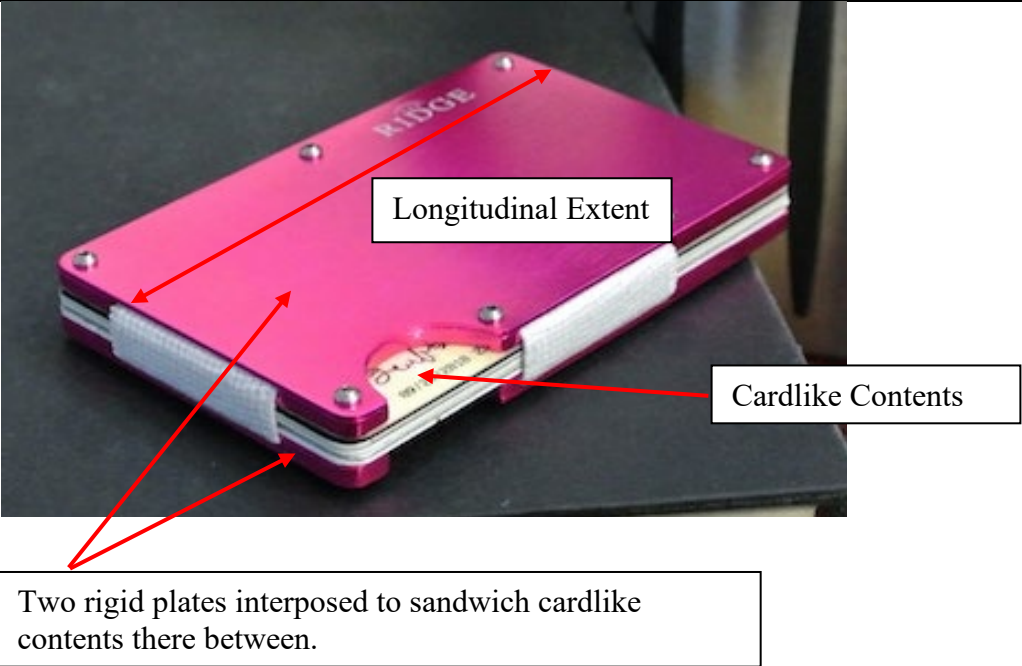
Kane is prior art under 102(a)(1) because it is a printed publication available before the earliest claimed priority date for the Asserted Claims.

The identification of claim elements within Kane and/or other references in the following chart is based in whole or in part on my present understanding of the Asserted Claims and on Complainant’s apparent construction or interpretation of the claims. By identifying where claim elements reside in Kane and/or other references in the following chart that would render obvious claims based on Complainant’s apparent construction or any other particular claim construction, it does not follow that I adopt or concur with Complainant’s allegations or constructions.

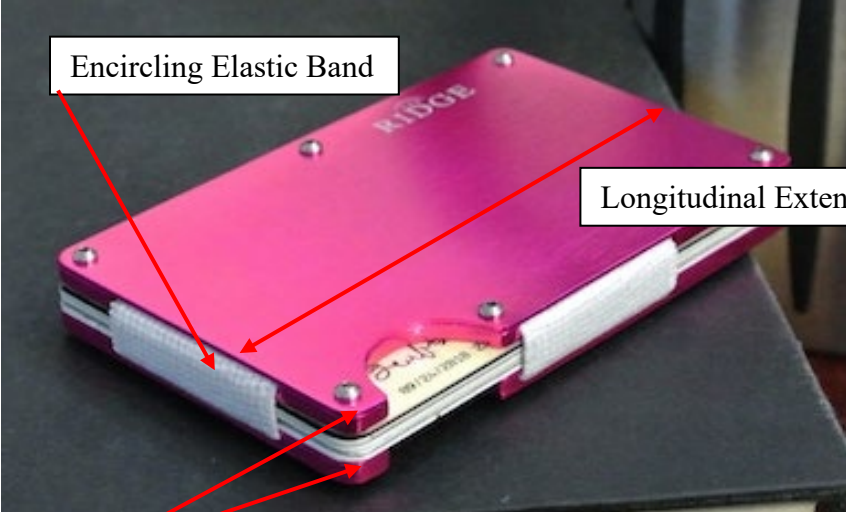
Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 ("Kane")

CL. No.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
1pre	A compact wallet, comprising:	https://www.kickstarter.com/projects/124039987/the-ridge-wallet-20 More than a minimalist wallet. With an integrated elastic track, The Ridge 2.0 can accommodate various numbers of cards without losing elasticity; providing an extremely thin wallet that isn't limited in its capacity.  Pictured: Aluminum pink without clip

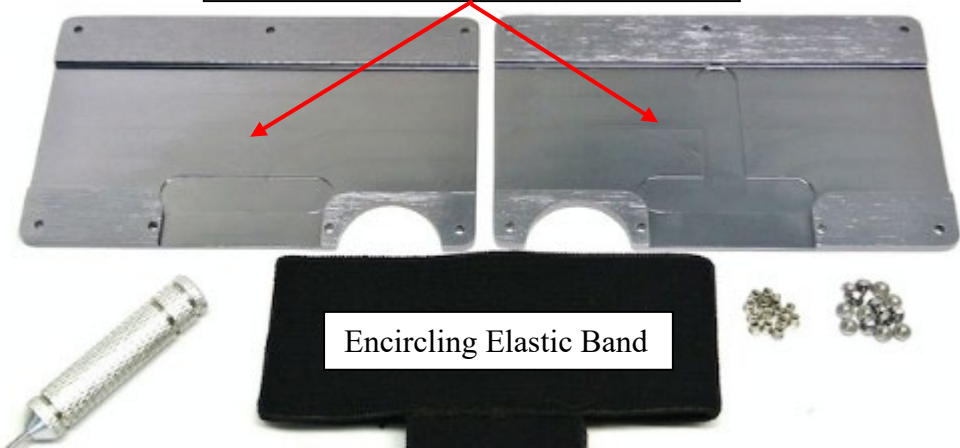
Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 ("Kane")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
1a	at least two rigid plates interposed to sandwich cardlike contents there between, each rigid plate having a longitudinal extent;	 Longitudinal Extent Cardlike Contents Two rigid plates interposed to sandwich cardlike contents there between.

Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 ("Kane")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
1b	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;	 Encircling Elastic Band Longitudinal Extent Two rigid plates  Encircling Elastic Band Elastic volume between at least two rigid plates for adding or removing contents.  1 card 4 cards 7 cards 10 cards

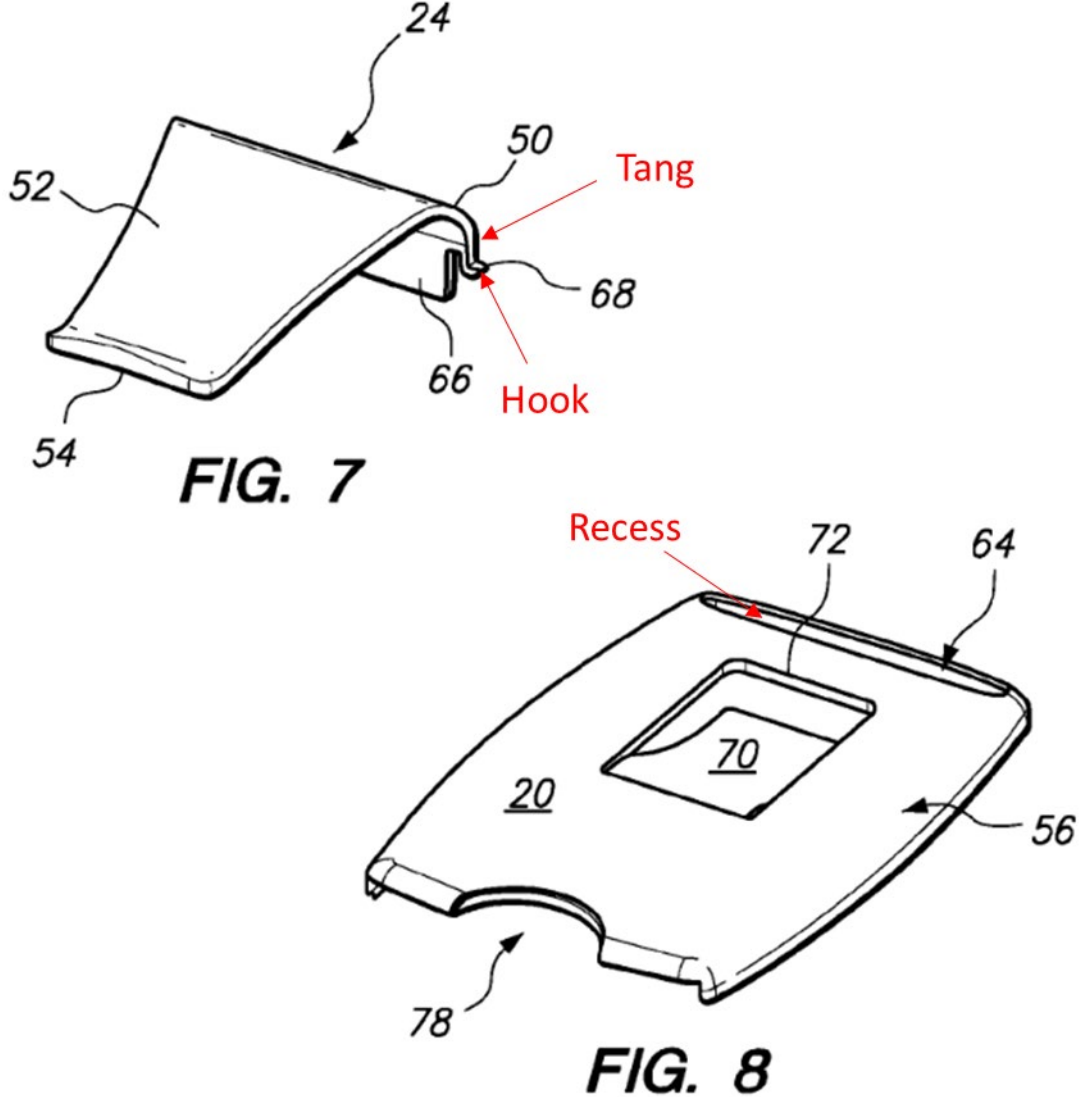
Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 ("Kane")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
1c	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,	Channeling means to minimize profile and hold the elastic band.  Encircling Elastic Band
1d	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	Removably attached auxiliary feature (money clip) attached to at least one of the at least two rigid plates.  The Ridge Wallet 2.0 by Daniel Kane — Kickstarter "What's New" Interchangeable faceplates (swap materials and money clips)

Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 (“Kane”)

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
	dislodgement of the auxiliary feature from the recess;	The money clip of Kaminski or clip of Murphy further discloses this element. Kaminski discloses this element in FIG. 7 and FIG. 8. A POSITA would be motivated to add a feature such as a money clip to the outside of the compact wallet for easier access to content that is easily viewable.

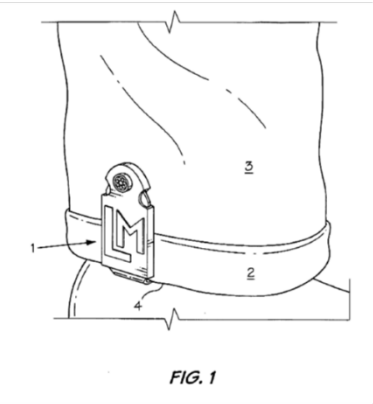
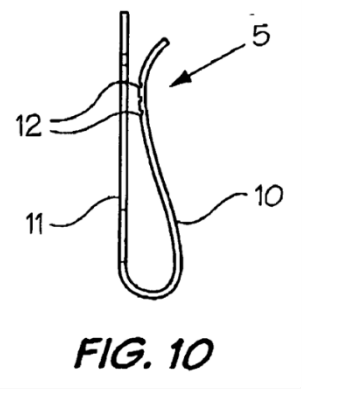
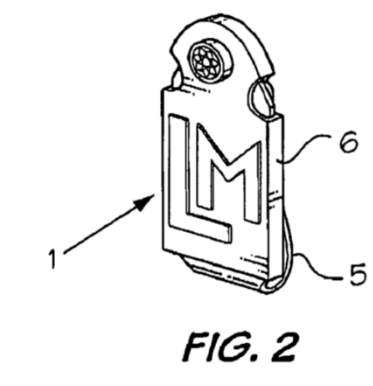
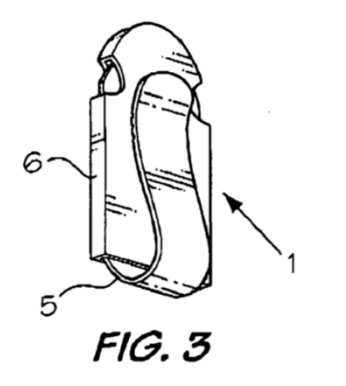
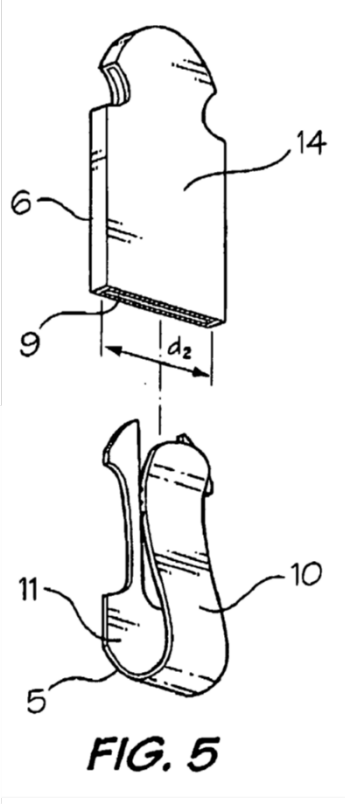
Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 ("Kane")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 FIG. 7 is a perspective view of a money clip 24. It features a main body 52, a base 54, and a curved end 50. A tang 50 is shown at the end of the clip, and a hook 66 is formed at the base of the tang. A retaining channel 68 is located at the base of the hook. FIG. 8 is a perspective view of a holder 20. It has a rectangular shape with rounded corners. A recess 72 is formed in the top edge, and a retaining channel 64 is formed in the bottom edge. A central opening 70 is visible, and a side edge 56 is shown. A bottom edge 78 is also indicated. “FIGS. 7, 8, 9 and 10 show an embodiment in which money clip 24 is a separate element secured to the holder 10 by a retaining channel 64

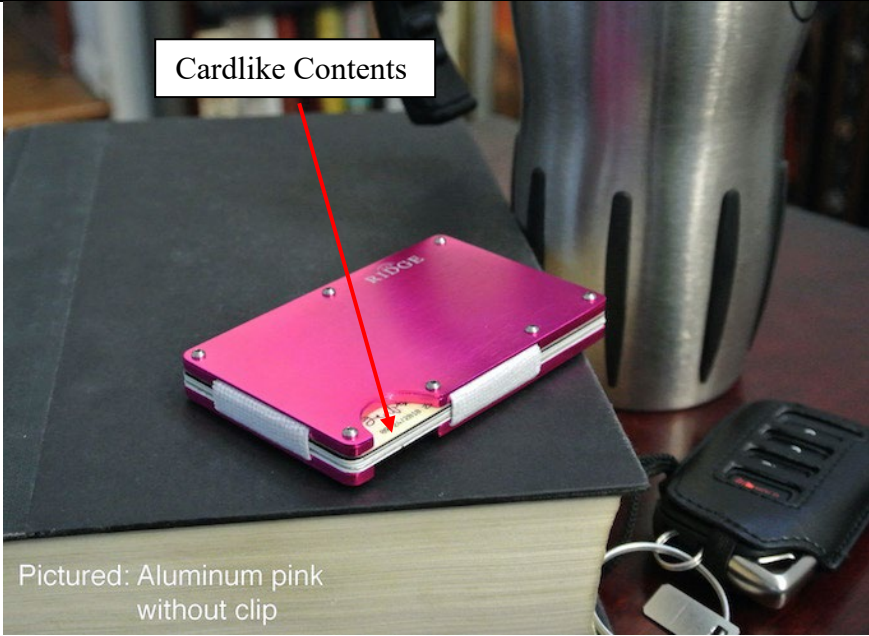
Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 ("Kane")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		molded into the first panel 20. Retaining channels 64 a and 64 b may be molded into each of panels 20 and 22. In FIGS. 7, 8, 9 and 10 retaining channel 64 a in panel 20 and 64 b in panel 22 are molded into the panels during their formation and are configured to be in alignment and to retain mating money clip tab 66 adjacent to the proximal end 50. This configuration increases retention area and provides additional strength to resist bending forces in money clip 24. In the separate configuration, money clip 24 is added to the assembly as follows: Prior to joining the panels 20 and 22 of the enclosure, clip distal end 54 is inserted through the retainer channel 64 in first panel 20 and pulled through the slot until tab 66 engages in channel 64 a and shoulder 68 engages the interior of the panel at the channel edge. Panels 20 and 22 are then brought together, engaging tab 66 in channel 64 b. Finally, panels 20 and 22 are joined as by being glued or welded together. U.S. Patent 7,334,616 at 4:16-35. A POSITA would be motivated to add the option of the functionality of an accessory such as a money clip and incorporate the money clip of Kaminski and the corresponding recess with an undercut on the lamina construction. To accommodate the elastic band, a POSITA would know to provide a gap in the center of 66. A POSITA would also be familiar with the use of removable clips for wallets. One example in the prior art is shown in U.S. Patent No. 5,103,884 Fig. 9. A POSITA would be motivated to have the clip be removable and this would be an additional reason to use screws rather than glue or welding to attach the lamina together (in addition to being able to replace the outer lamina and or band).

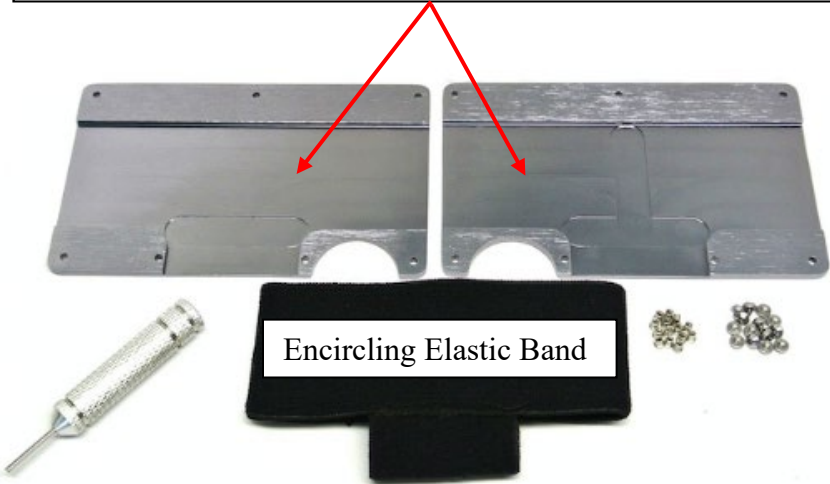
Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 ("Kane")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		Another example of a removable clip that uses two tangs with a hook at an angle to engage an undercut of a recess is shown in U.S. Patent Application Publication 2006/0010661 ("Murphy").      While the clip of Murphy is shown as clipping to the cuff of a pant leg (that can have variable thickness), the clip 10 is similar to that used for a money clip or a clip that could attach a wallet to a belt for example. A POSITA would also be motivated to use the tang and hook arrangement to secure a removable clip or accessory to the wallet (the combination described above). In addition, the abstract describes the

Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 ("Kane")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		invention as "[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. In Kane, a POSITA wanting to add a removable clip could incorporate the removable clips or their combinations discussed above that utilize a tang with a hook that extends at an angle and engages the undercut of a recess.
1e	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.,	 Cardlike Contents Pictured: Aluminum pink without clip

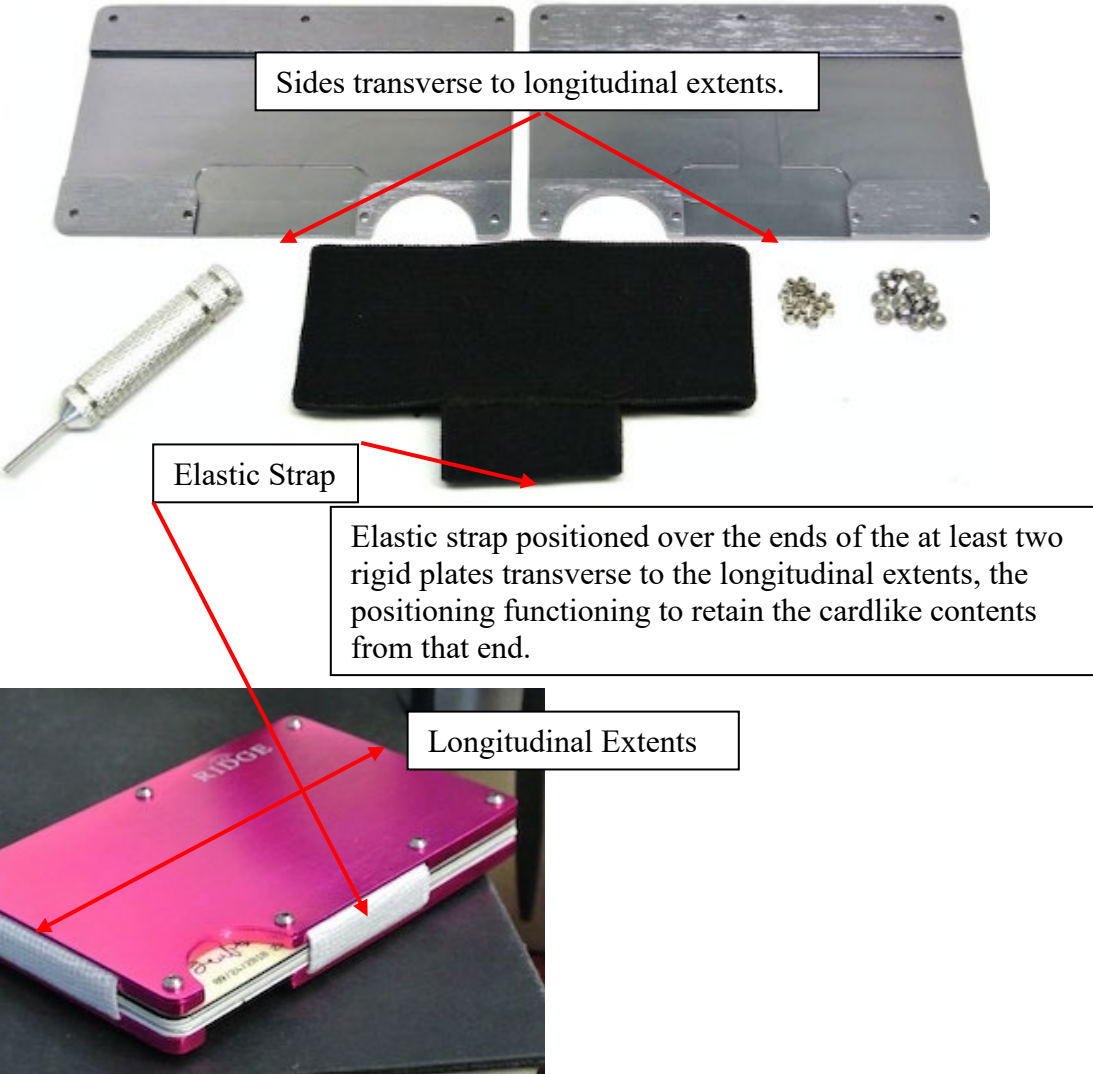
Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 ("Kane")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		Expandable Capacity  1 card 4 cards 7 cards 10 cards
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 slidingly receiving one part of the at least one encircling elastic band.	Longitudinal groove at inner lamina of laminate construction, slidingly receives one part of the encircling elastic band.  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	From 'what's new' section: • Interchangeable faceplates (swap materials and money clips) • Custom hex screws instead of rivets From 'Construction' section:

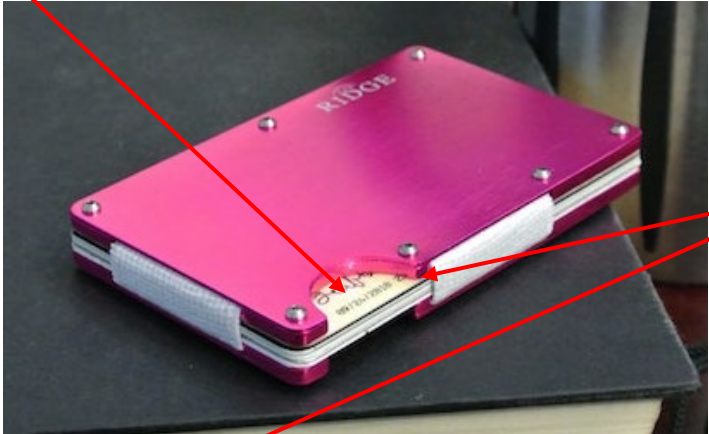
Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 ("Kane")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
	hold the at least one elastic band in capture and provide a smooth surface for glide purposes	The track runs along two hollow interior plates machined from anodized aircraft grade aluminum. The interior is hand-polished to prevent scratches and allow your cards to slide smoothly. Smooth surface of second lamina of the laminate construction, capturing the elastic band.  Elastic band in capture
4	The compact wallet of claim 3, wherein the second lamina is attached to the first lamina by screws.	From 'what's new' section: • Interchangeable faceplates (swap materials and money clips) • Custom hex screws instead of rivets Screws with hex drive feature 

Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 ("Kane")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
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 cardlike contents from that end.	
12	The compact wallet of claim 1, further comprising aligned	

Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 ("Kane")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
	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.	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  Proximal Ends  Fulcrum 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	From 'Construction' section: The Integrated Elastic Track can expand to hold up to 12 cards and then immediately contract to hold a single card securely. And should the elastic ever wear out, you can easily replace it.

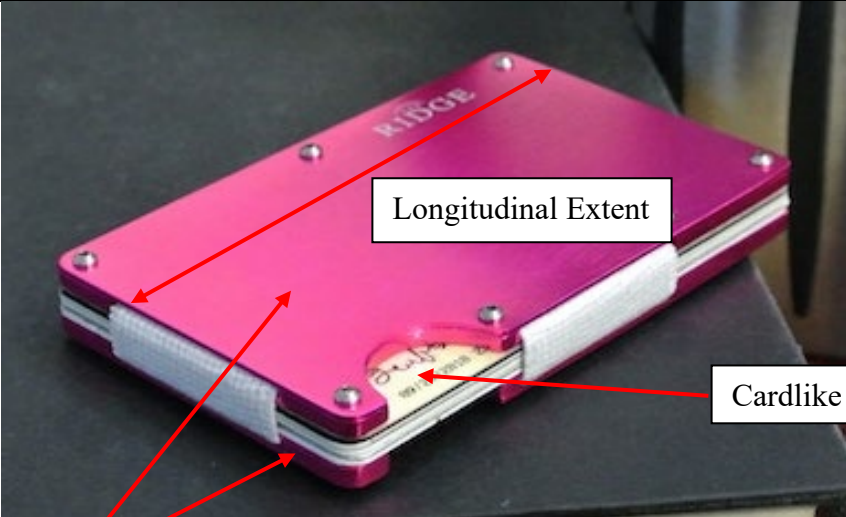
Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 ("Kane")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
	fabric	
14pre	A compact wallet, comprising:	https://www.kickstarter.com/projects/124039987/the-ridge-wallet-20 More than a minimalist wallet. With an integrated elastic track, The Ridge 2.0 can accommodate various numbers of cards without losing elasticity; providing an extremely thin wallet that isn't limited in it's capacity.

Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 (“Kane”)

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 Pictured: Aluminum pink without clip

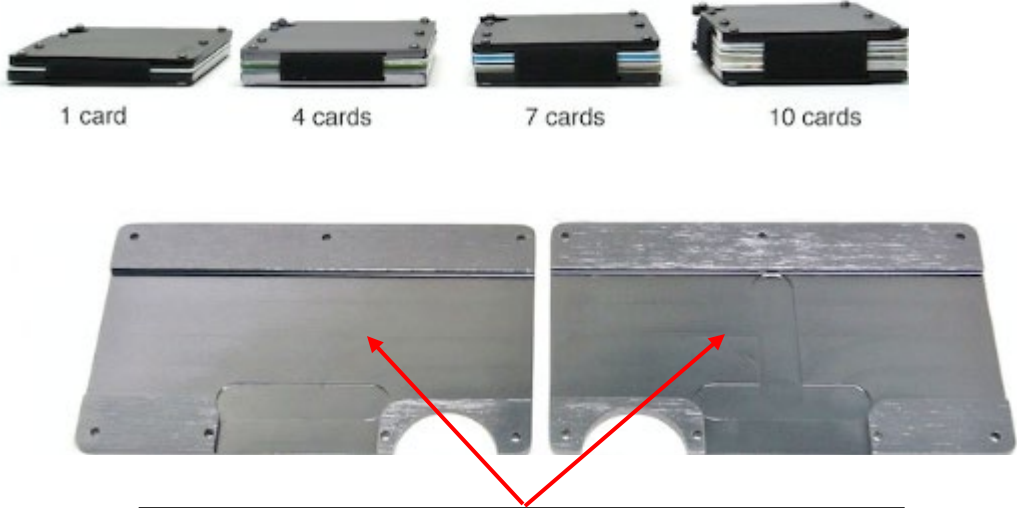
Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 ("Kane")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
14a	at least two rigid plates interposed to sandwich cardlike contents there between, each rigid plate having a groove along a longitudinal extent thereof,	 Longitudinal Extent Cardlike Contents Two rigid plates interposed to sandwich cardlike contents there between.

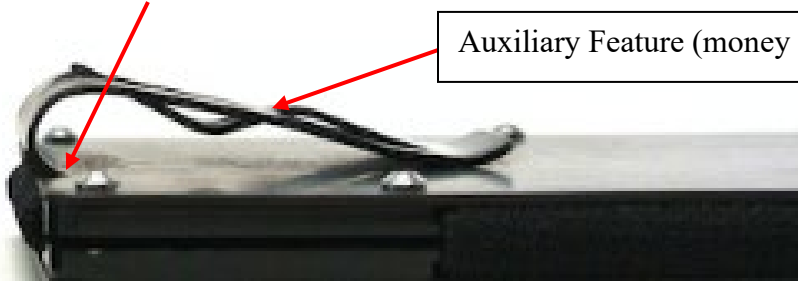
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Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 ("Kane")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
14b	at least one encircling elastic band slidingly 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	 Longitudinal Extent Encircling Elastic Band Two rigid plates Elastic volume between at least two rigid plates for adding or removing contents.

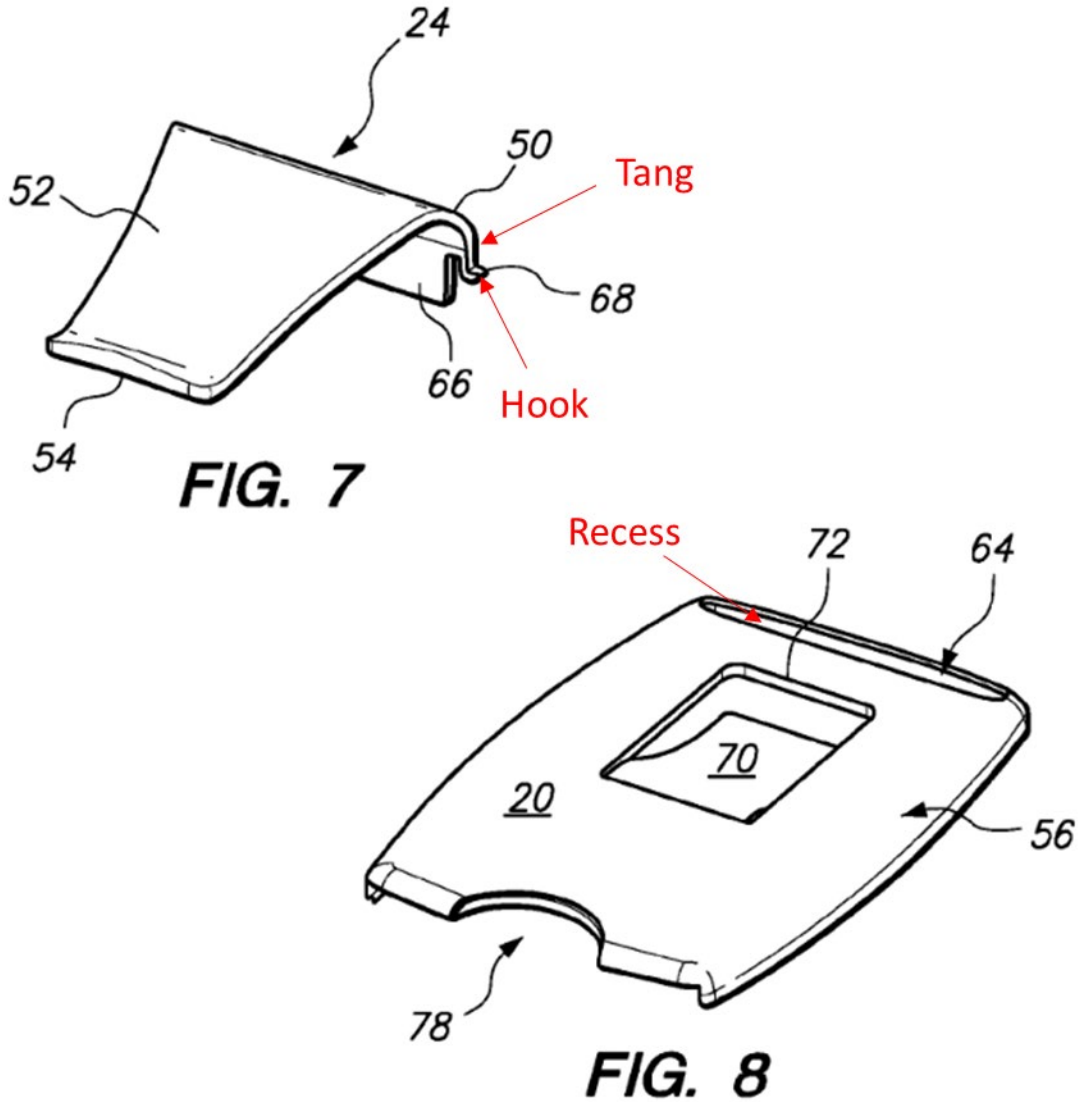
Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 ("Kane")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 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

Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 (“Kane”)

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
14c	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,	Recess formed inside at least one of the at least two ridged plates, the recess operable to receive a tang of an auxiliary feature. Auxiliary Feature (money clip)  The Ridge Wallet 2.0 by Daniel Kane — Kickstarter “What’s New” • Interchangeable faceplates (swap materials and money clips) The money clip of Kaminski or clip of Murphy further discloses this element. Kaminski discloses this element in FIG. 7 and FIG. 8. A POSITA would be motivated to add a feature such as a money clip to the outside of the compact wallet for easier access to content that is easily viewable.

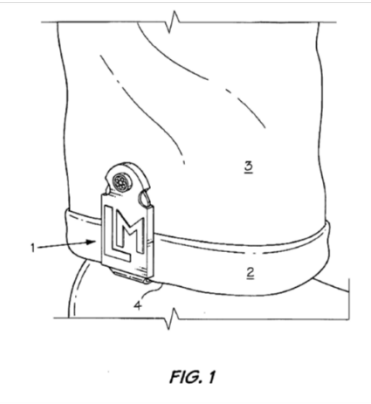
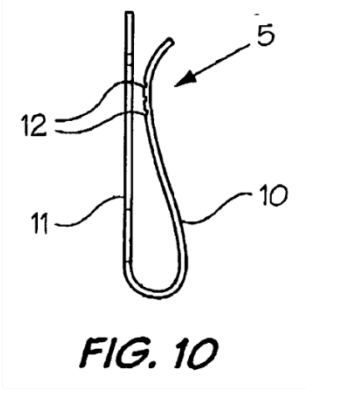
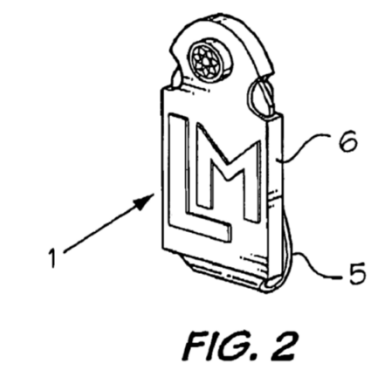
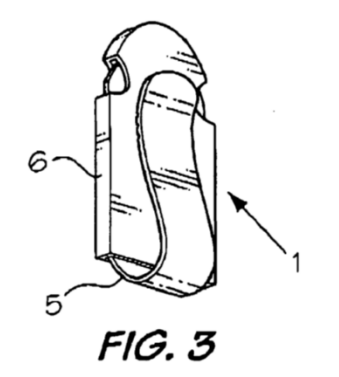
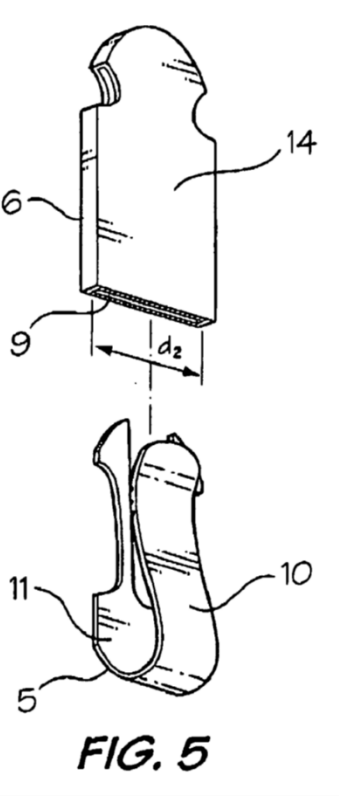
Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 ("Kane")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 FIG. 7 is a perspective view of a money clip 24. It features a main body 52 with a curved end 54. A tang 50 is located at the curved end, which fits into a hook 66. The hook 66 is part of a retaining channel 68. FIG. 8 is a perspective view of a holder 10. It has a central recess 70 and a retaining channel 64 along one edge. Other features include a recess 72, a side edge 56, and a bottom edge 78. “FIGS. 7, 8, 9 and 10 show an embodiment in which money clip 24 is a separate element secured to the holder 10 by a retaining channel 64

Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 ("Kane")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		molded into the first panel 20. Retaining channels 64 a and 64 b may be molded into each of panels 20 and 22. In FIGS. 7, 8, 9 and 10 retaining channel 64 a in panel 20 and 64 b in panel 22 are molded into the panels during their formation and are configured to be in alignment and to retain mating money clip tab 66 adjacent to the proximal end 50. This configuration increases retention area and provides additional strength to resist bending forces in money clip 24. In the separate configuration, money clip 24 is added to the assembly as follows: Prior to joining the panels 20 and 22 of the enclosure, clip distal end 54 is inserted through the retainer channel 64 in first panel 20 and pulled through the slot until tab 66 engages in channel 64 a and shoulder 68 engages the interior of the panel at the channel edge. Panels 20 and 22 are then brought together, engaging tab 66 in channel 64 b. Finally, panels 20 and 22 are joined as by being glued or welded together. U.S. Patent 7,334,616 at 4:16-35. A POSITA would be motivated to add the option of the functionality of an accessory such as a money clip and incorporate the money clip of Kaminski and the corresponding recess with an undercut on the lamina construction. To accommodate the elastic band, a POSITA would know to provide a gap in the center of 66. A POSITA would also be familiar with the use of removable clips for wallets. One example in the prior art is shown in U.S. Patent No. 5,103,884 Fig. 9. A POSITA would be motivated to have the clip be removable and this would be an additional reason to use screws rather than glue or welding to attach the lamina together (in addition to being able to replace the outer lamina and or band).

Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 ("Kane")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		Another example of a removable clip that uses two tangs with a hook at an angle to engage an undercut of a recess is shown in U.S. Patent Application Publication 2006/0010661 ("Murphy").      While the clip of Murphy is shown as clipping to the cuff of a pant leg (that can have variable thickness), the clip 10 is similar to that used for a money clip or a clip that could attach a wallet to a belt for example. A POSITA would also be motivated to use the tang and hook arrangement to secure a removable clip or accessory to the wallet (the combination described above). In addition, the abstract describes the

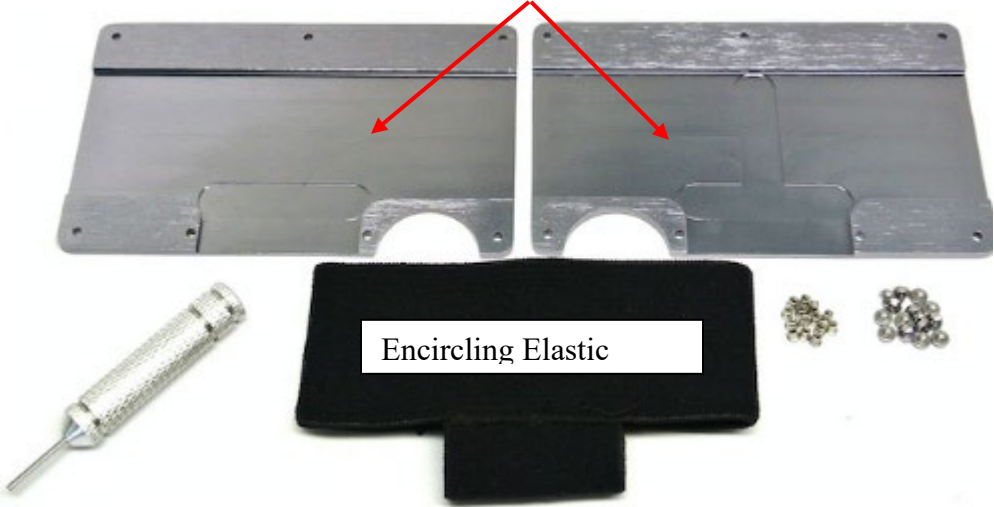
Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 (“Kane”)

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		invention as “[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. In Kane, a POSITA wanting to add a removable clip could incorporate the removable clips or their combinations discussed above that utilize a tang with a hook that extends at an angle and engages the undercut of a recess.

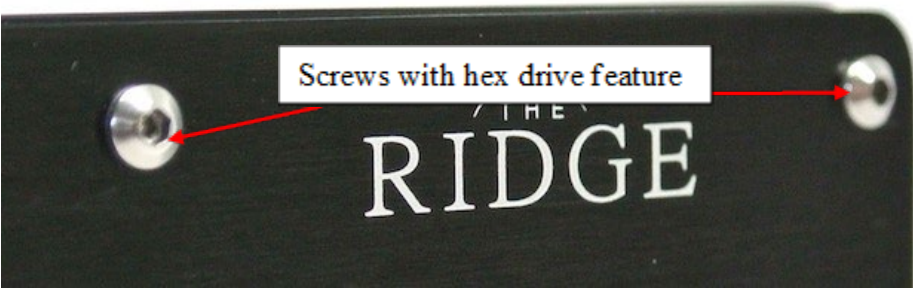
Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 ("Kane")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE	
14d	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.	 Pictured: Titanium Black with expandable capacity and ready access to individual contents from between the at least two rigid plates. 1 card 4 cards 7 cards 10 cards	
15	The compact wallet of claim 14, wherein the groove is in a first	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	

Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 ("Kane")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
	lamina of a laminate construction of each rigid plate, the groove slidingly receiving one part of the at least one encircling elastic band	 The photograph shows two rectangular metal plates with a central groove. A syringe-like tool is positioned to the left of a black T-shaped object labeled 'Encircling Elastic'. Two small metal clusters are to the right of the T-shaped object. Red arrows point from the top of the T-shaped object to the grooves on the metal plates.
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	From 'what's new' section: • Interchangeable faceplates (swap materials and money clips) • Custom hex screws instead of rivets From 'Construction' section: The track runs along two hollow interior plates machined from anodized aircraft grade aluminum. The interior is hand-polished to prevent scratches and allow your cards to slide smoothly.

Ex. B
Comparison of U.S. Patent No. 10,791,808 and Kickstarter 2.0 ("Kane")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		Smooth surface of second lamina of the laminate construction, capturing the elastic band.  Elastic band in capture
17	The compact wallet of claim 16, wherein the second lamina is attached to the first lamina by screws	From 'what's new' section: Custom hex screws instead of rivets  Screws with hex drive feature

Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

Prior Art Publication

As described in the following claim chart, all asserted claims of U.S. Patent No. 10,791,808 ("808 Patent") are invalid in view of the Smart Money Clip II ("SMCII") either alone or in view of the knowledge of a person of ordinary skill in the art and the references as detailed below.

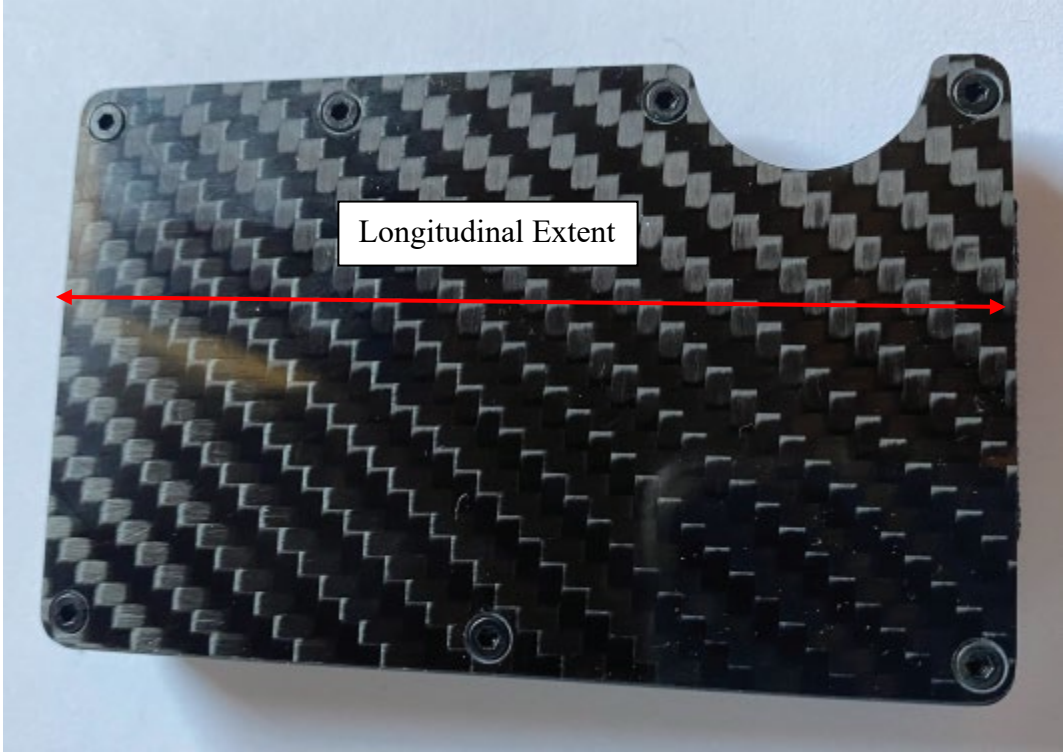
The identification of claim elements within SMCII and/or other references in the following chart is based in whole or in part on my present understanding of the Asserted Claims and on Complainant's apparent construction or interpretation of the claims. By identifying where claim elements reside in SMCII and/or other references in the following chart that would render obvious claims based on Complainant's apparent construction or any other particular claim construction, it does not follow that I adopt or concur with Complainant's allegations or constructions.

SMCII is prior art as of 2011 based on an April 23, 2021 declaration from Scott Kaminski that was submitted in Case No. 2:20-cv-04556-AB-JC.

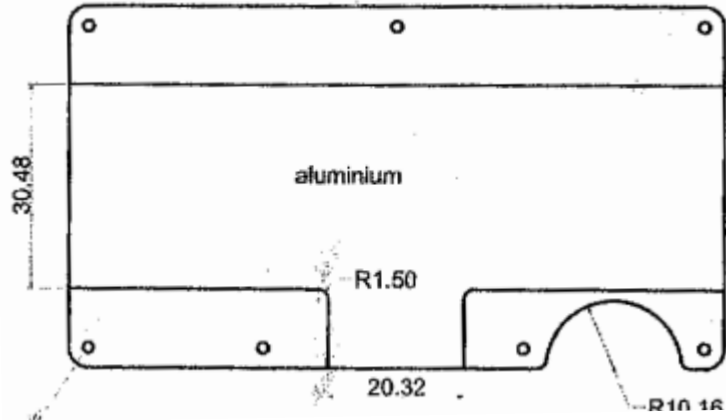
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. No.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
1pre	A compact wallet, comprising:	SMCII is a compact wallet 
1a	at least two rigid plates interposed to sandwich cardlike contents there between, each rigid plate having a longitudinal extent;	 Two rigid plates where cardlike contents may be sandwiched.

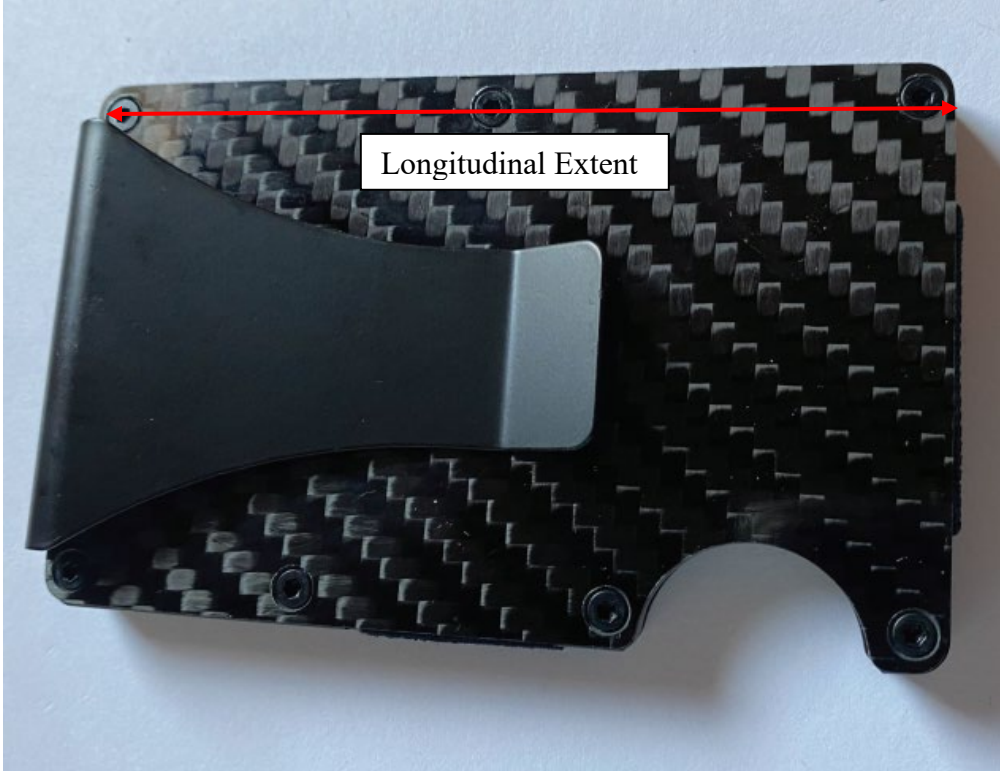
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		First Rigid Plate 

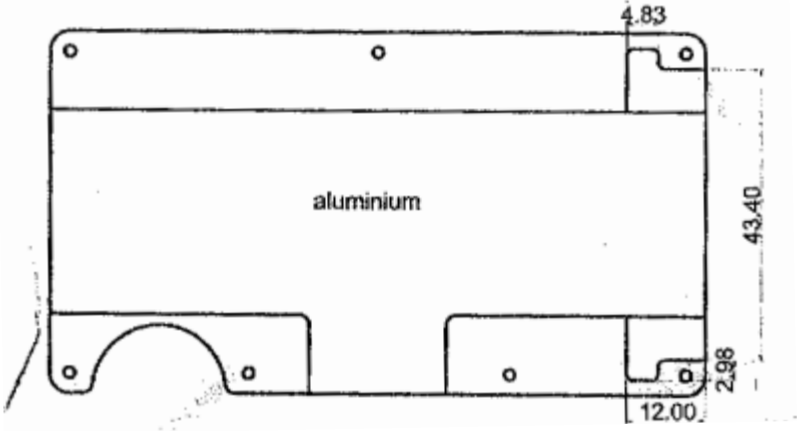
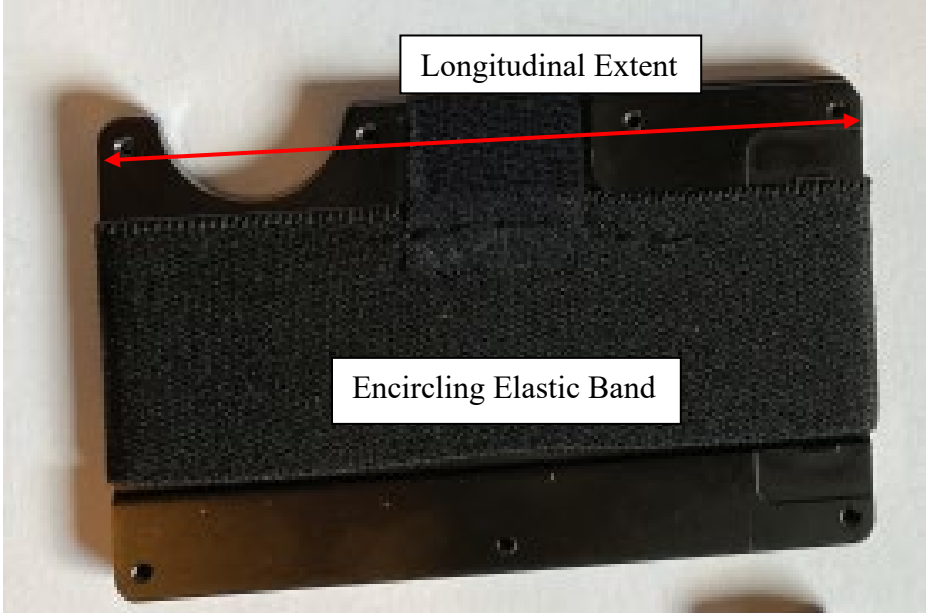
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 The drawing shows a top-down view of a rectangular aluminum money clip. The word "aluminium" is centered on the clip. Dimensions include a height of 30.48 on the left side, a width of 20.32 at the bottom, and a fillet radius of R1.50 at the bottom center. There are four circular holes: two at the top corners and two at the bottom corners. A semi-circular notch is located on the right side of the bottom edge, with a radius dimension of R10.18 indicated.

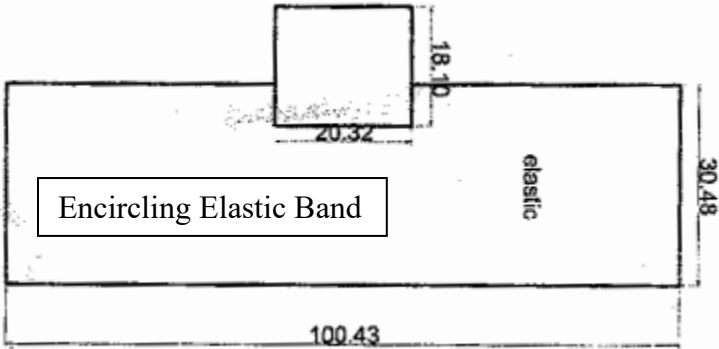
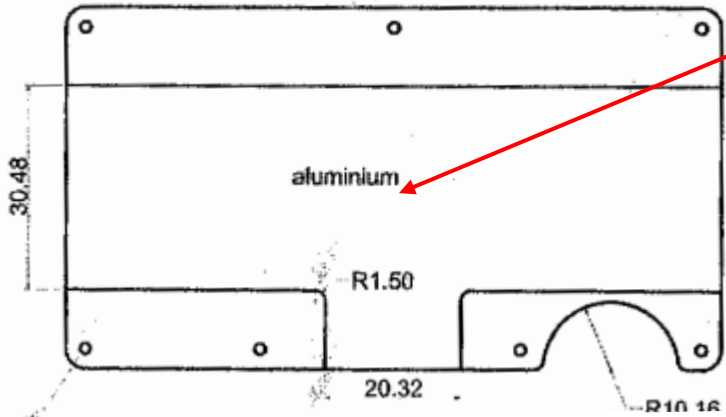
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		Second Rigid Plate 

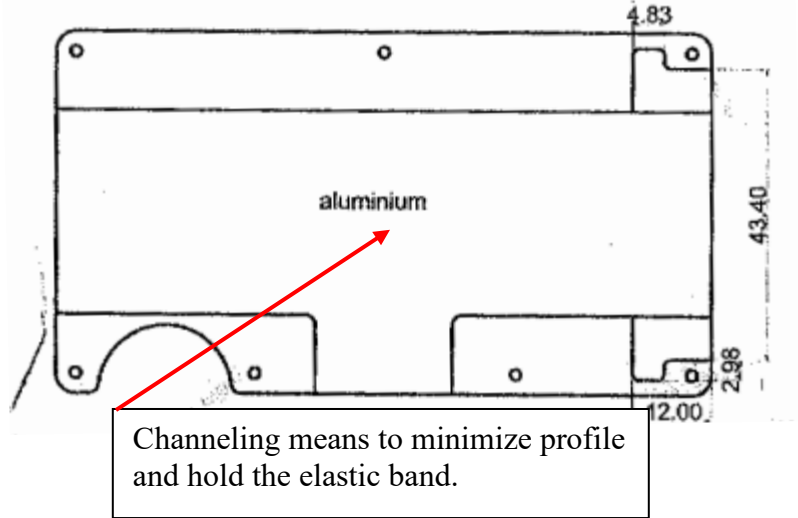
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		
1b	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;	

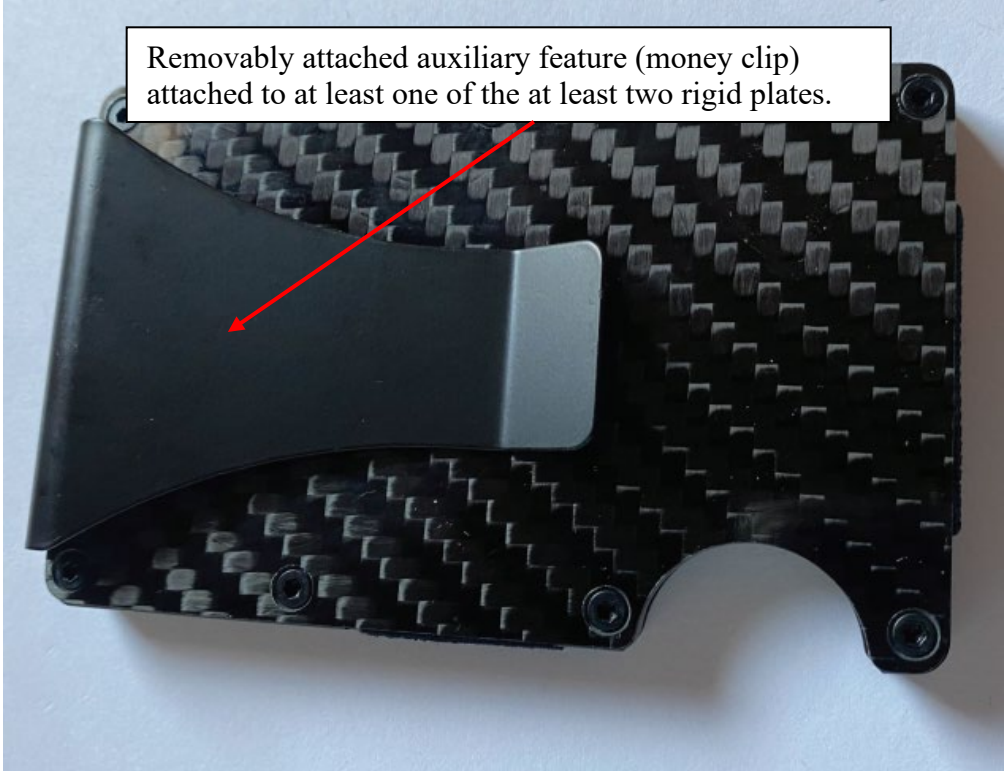
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		
1c	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,	The SMCII has a channeling means configured to minimize the wallet's profile and hold the position of the encircling elastic band with respect to each plate, while allowing the entire band to extend and contract over the length of the whole band. The channel is a groove spanning the extent of one or more of the rigid plates or a longitudinal bore through each rigid plate.  Channeling means to minimize profile and hold the elastic band.

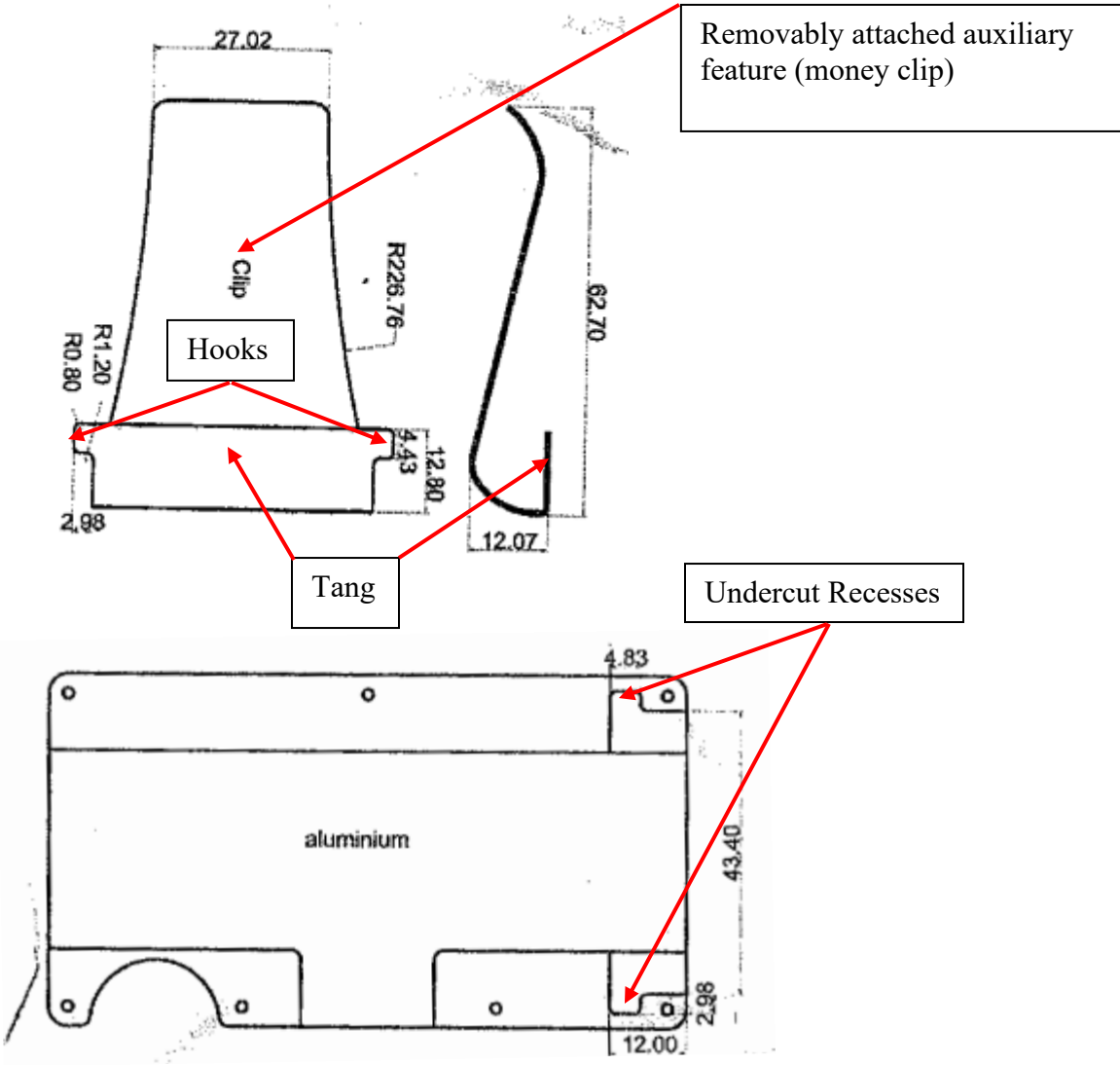
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		
1d	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	The SMCII has 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 a rigid plate, 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.

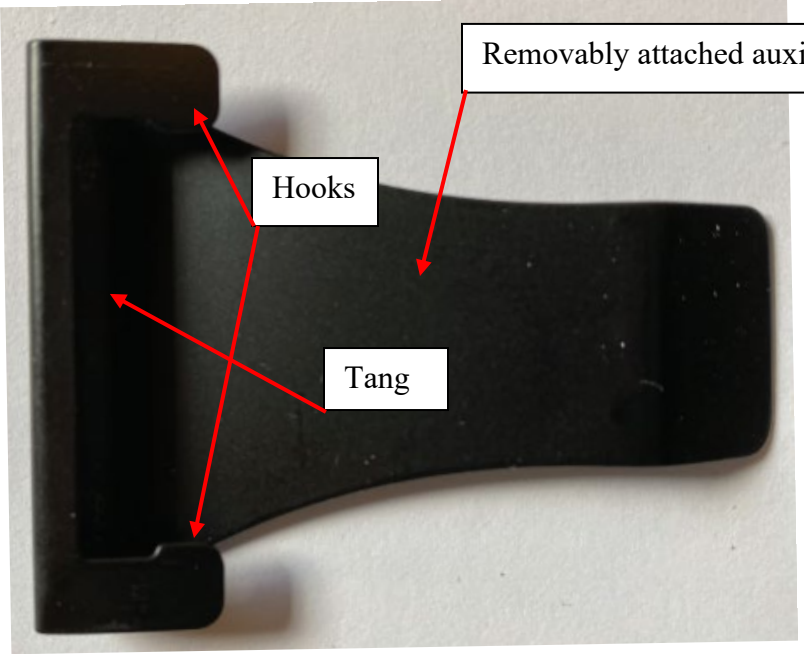
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
	dislodgement of the auxiliary feature from the recess,;	

Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 The figure contains two technical drawings. The top drawing is a side view of a money clip with dimensions: 27.02 (width), 62.70 (height), R226.76 (radius), 12.80 (width), 12.07 (width), 4.43 (width), 2.98 (width), R1.20 (radius), and R0.80 (radius). A red arrow points to the clip with the label 'Clip'. Two red arrows point to the bottom edges with the label 'Hooks'. A red arrow points to the bottom edge with the label 'Tang'. A red arrow points to the top edge with the label 'Removably attached auxiliary feature (money clip)'. The bottom drawing is a top view of an aluminum component with dimensions: 4.83 (width), 43.40 (height), 2.98 (width), and 12.00 (width). The word 'aluminium' is written in the center. Two red arrows point to the bottom corners with the label 'Undercut Recesses'.

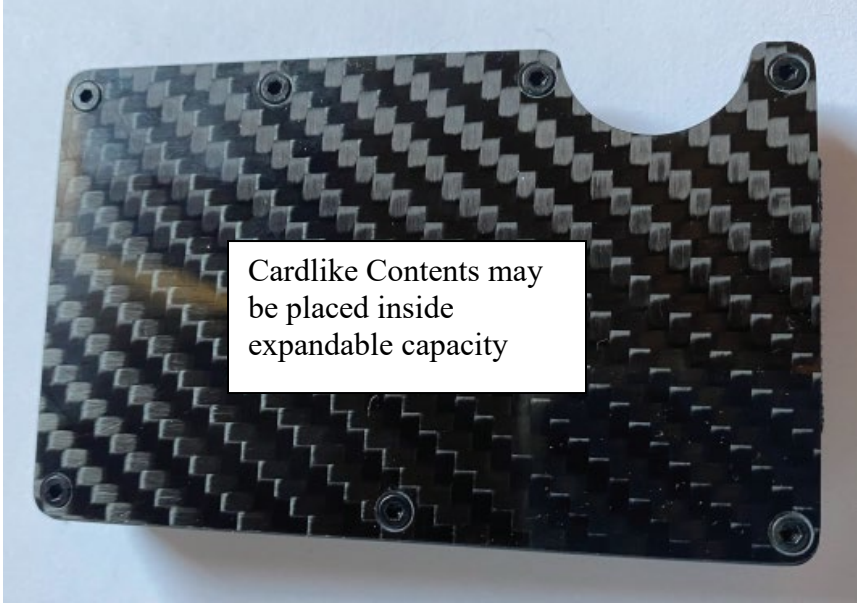
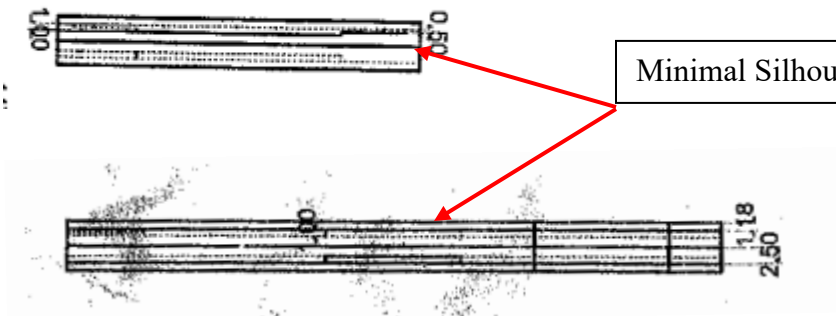
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 Removably attached auxiliary feature (money clip) Hooks Tang

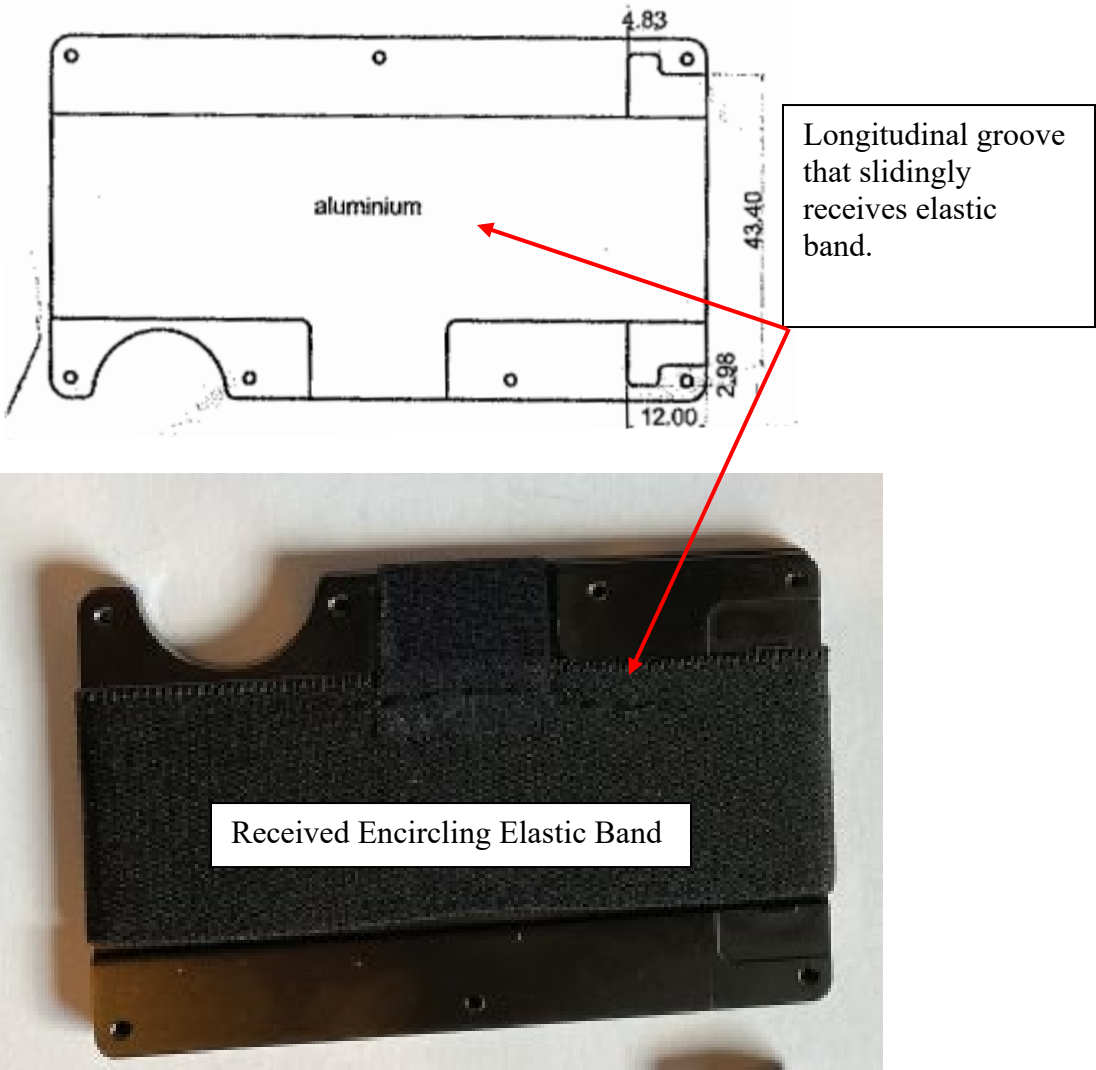
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 Undercut Recesses
1e	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.,	The SMCII enables card-like contents to 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.

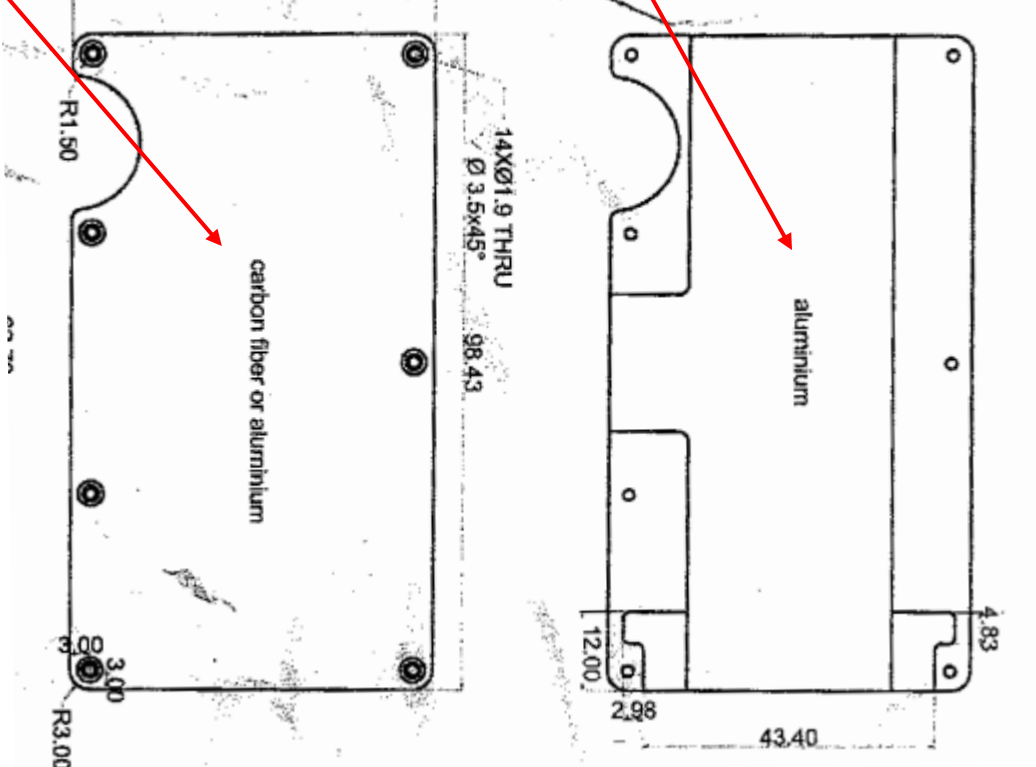
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 Cardlike Contents may be placed inside expandable capacity  Minimal Silhouette
2	The compact wallet of claim 1, wherein the channeling means is a longitudinal groove in a first	The SMCII has 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.

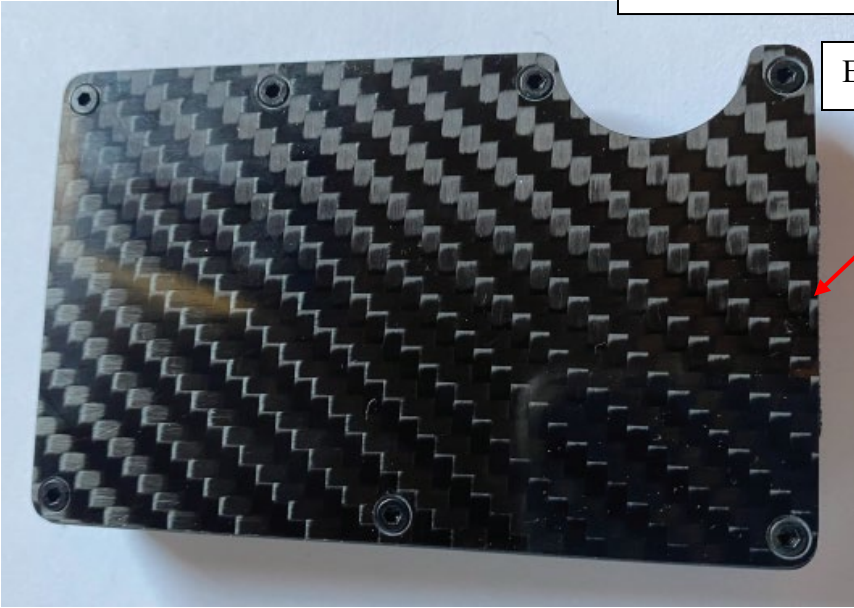
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
	lamina of a laminate construction of each rigid plate, the groove slidingly receiving one part of the at least one encircling elastic band.	 The technical drawing (top) shows a rectangular plate with a longitudinal groove. Dimensions include 4.83, 43.40, 2.98, and 12.00. The word 'aluminium' is written inside the plate. A red arrow points from the groove to a text box: 'Longitudinal groove that slidingly receives elastic band.' The photograph (bottom) shows a physical black plastic component with a similar longitudinal groove. A red arrow points from the same groove to a text box: 'Received Encircling Elastic Band'.

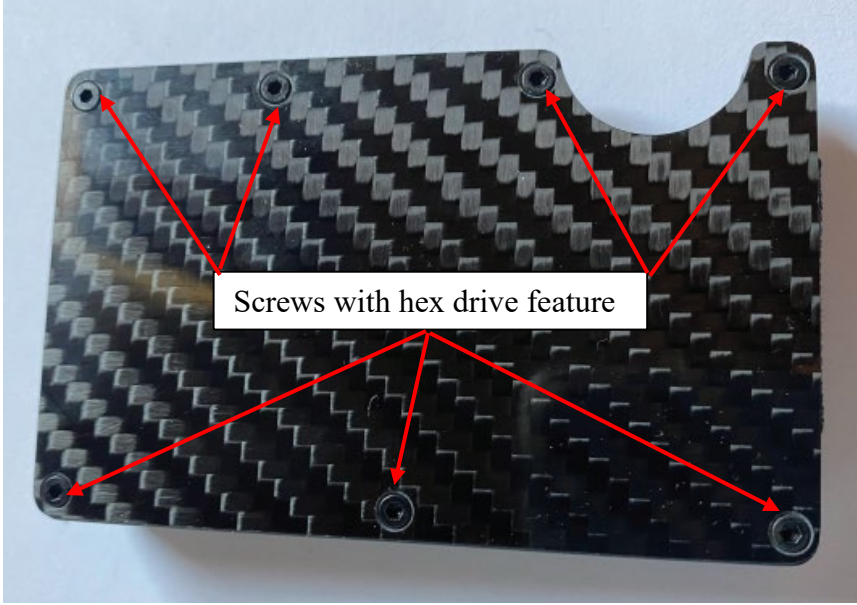
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
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	The SMCII has 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. Second lamina that attaches to first lamina to capture the elastic band. Provides a smooth surface for glide purposes First lamina with groove to hold elastic band. 

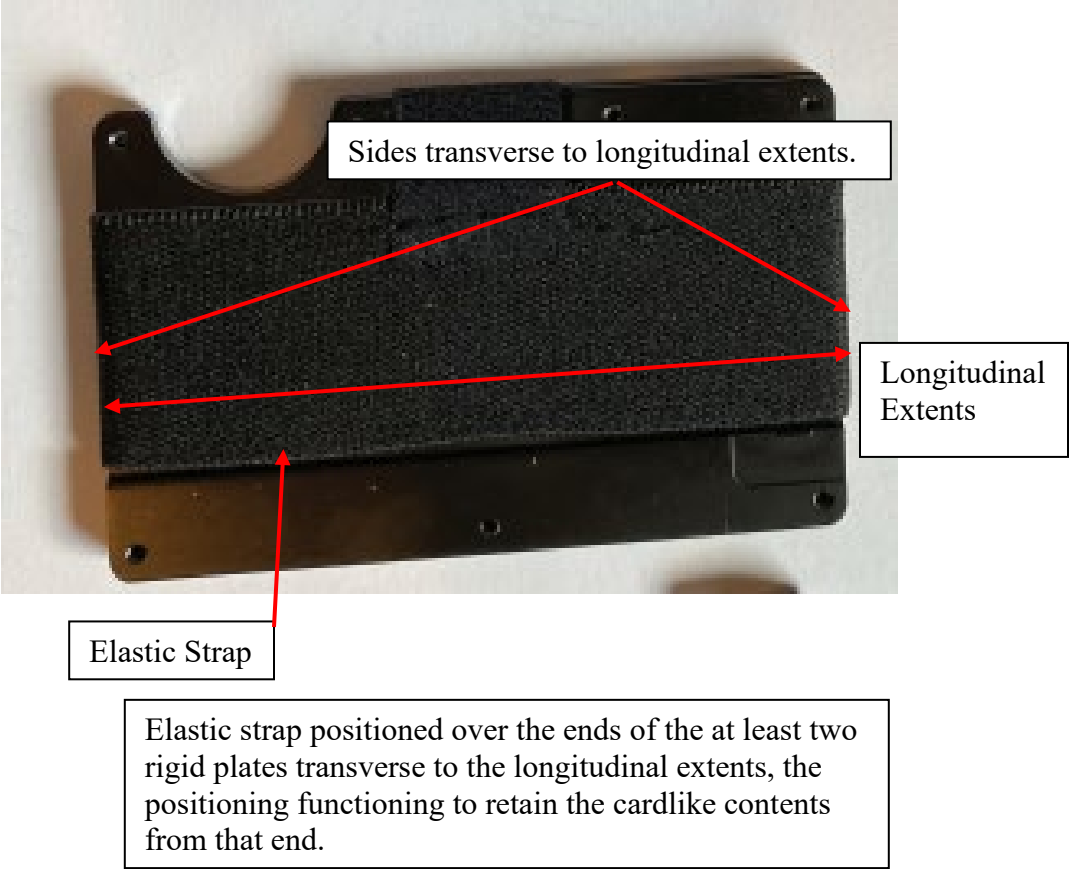
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		Second lamina attached to top of first lamina by screw fastener to hold elastic band in place.  Elastic band held in place
4	The compact wallet of claim 3, wherein the second lamina is attached to the first lamina by screws.	

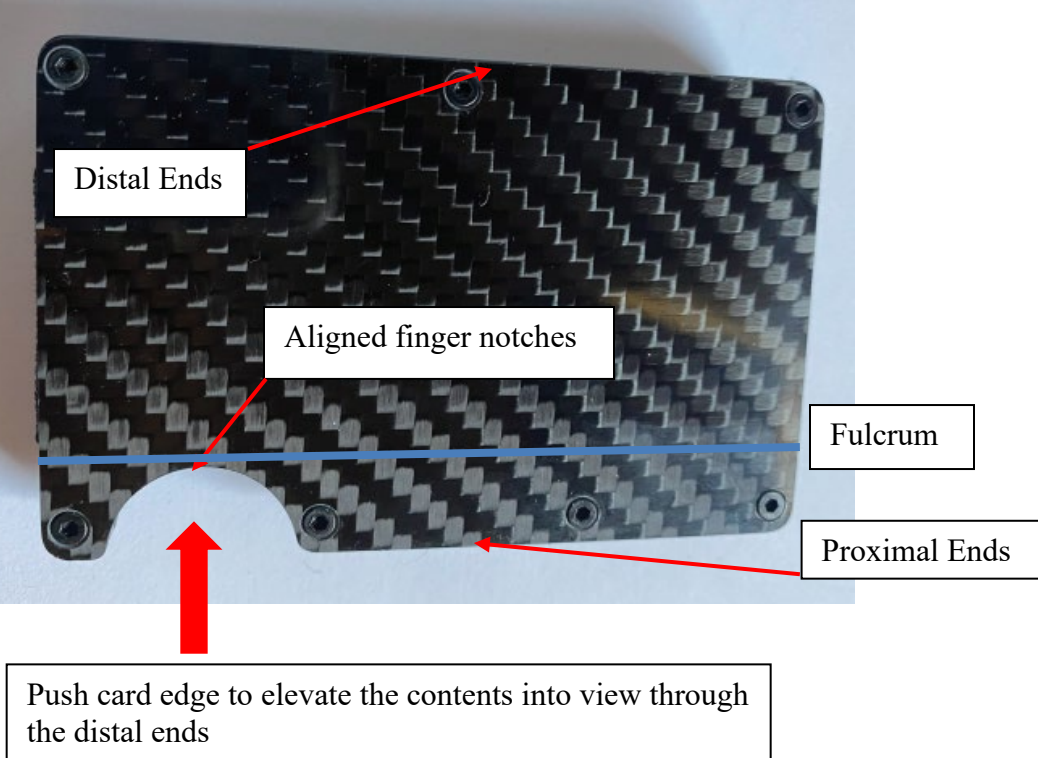
Ex. C
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CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		
9	The compact wallet of claim 1, further comprising a first elastic strap positioned over the ends of the at least two rigid plates transverse to the longitudinal extents, the positioning functioning to retain the cardlike contents from that end.	The SMCII has 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.

Ex. C
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CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		
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	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

Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
	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	The elastic bands of the SMCII are comprised of woven elastic fabric.

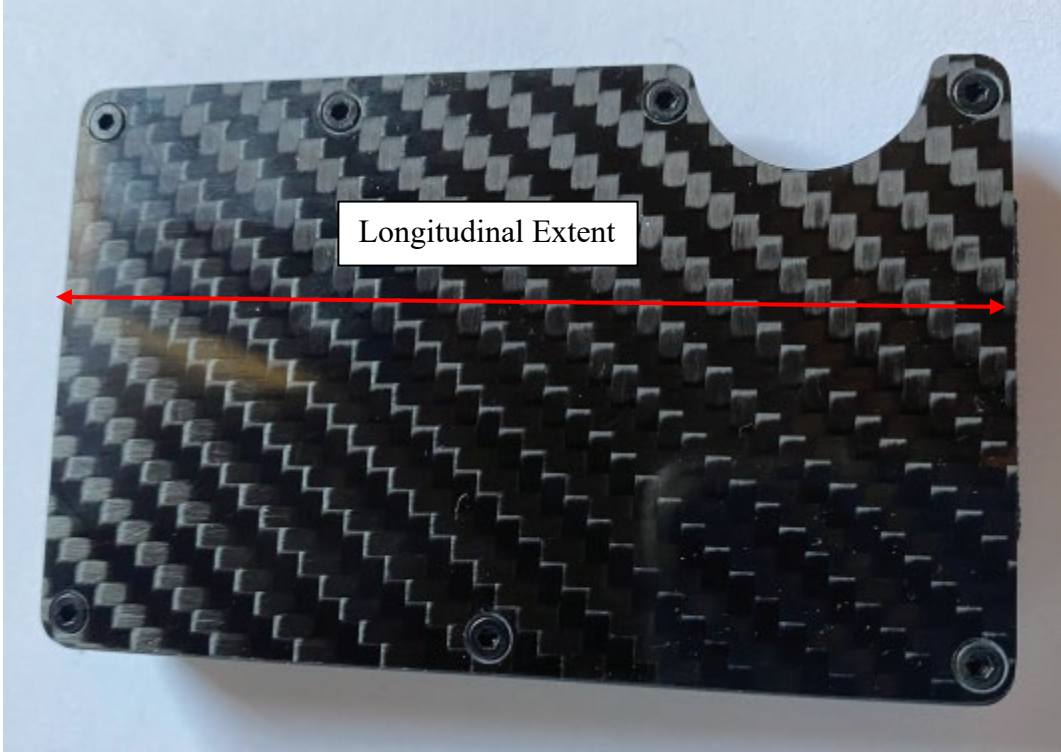
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II (“SMCII”)

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		
14pre	A compact wallet, comprising:	The SMCII is a compact wallet.

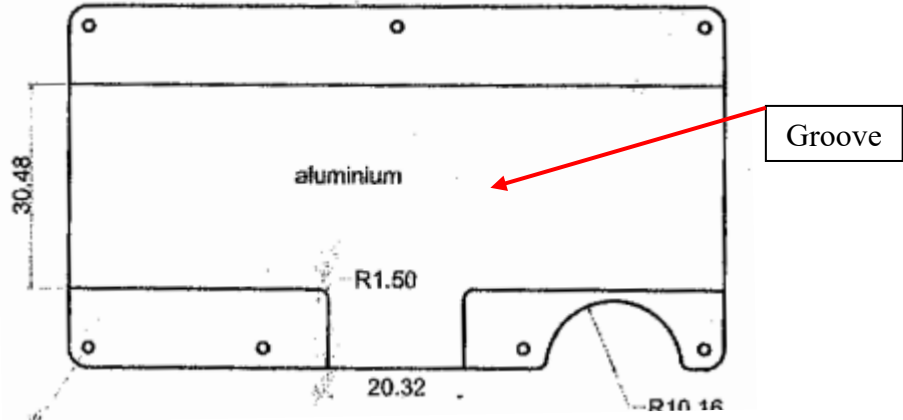
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		
14a	at least two rigid plates interposed to sandwich cardlike contents there between, each rigid plate having a groove along a longitudinal extent thereof,	The SMCII has two rigid plates interposed to sandwich card-like contents there between, with each rigid plate having a groove along a longitudinal extent.  Two rigid plates where cardlike contents may be sandwiched.

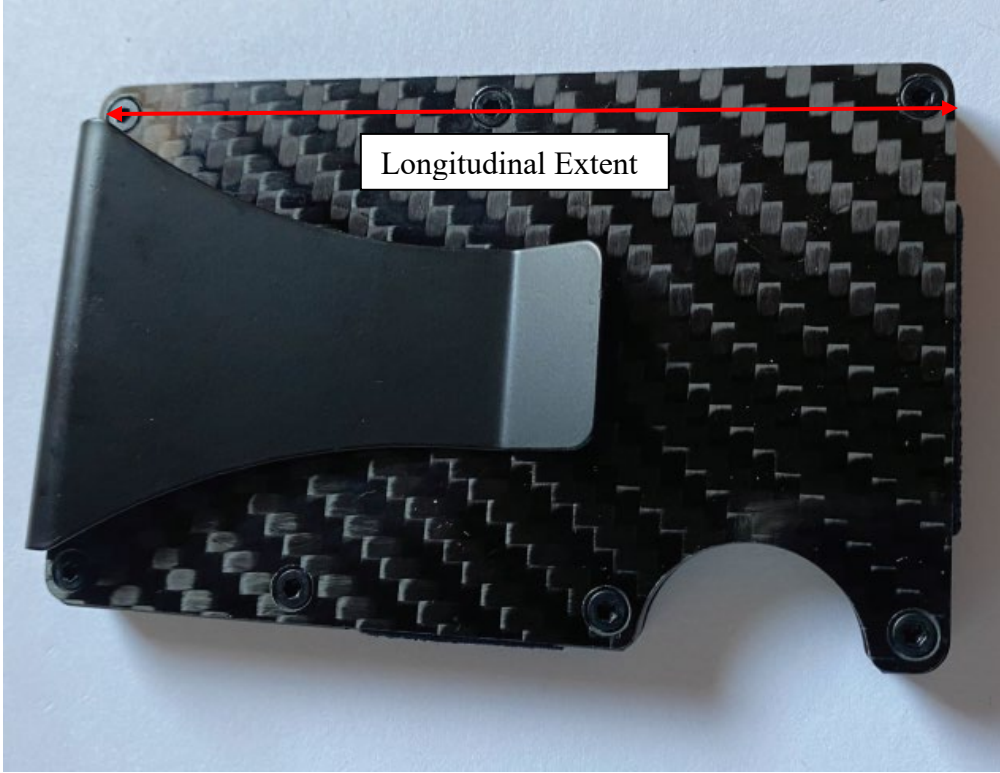
Ex. C
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CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		First Rigid Plate 

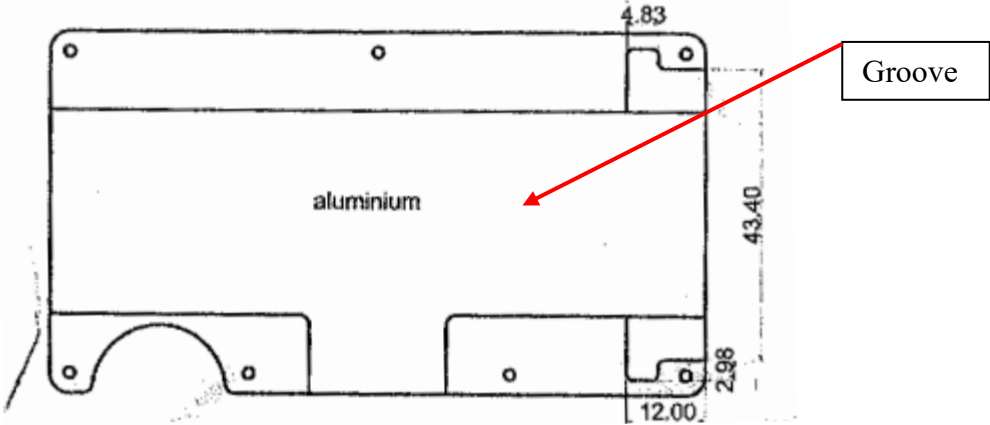
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CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		

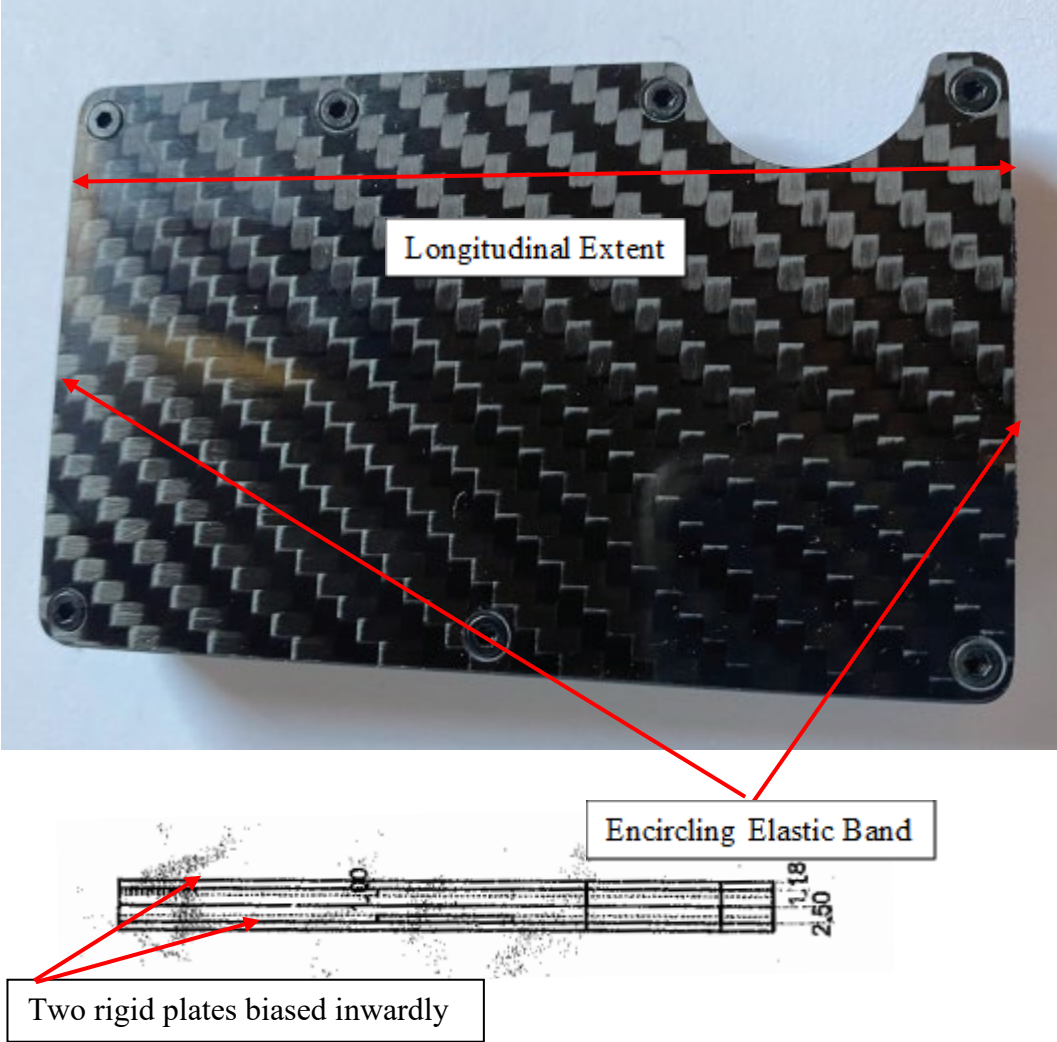
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		Second Rigid Plate 

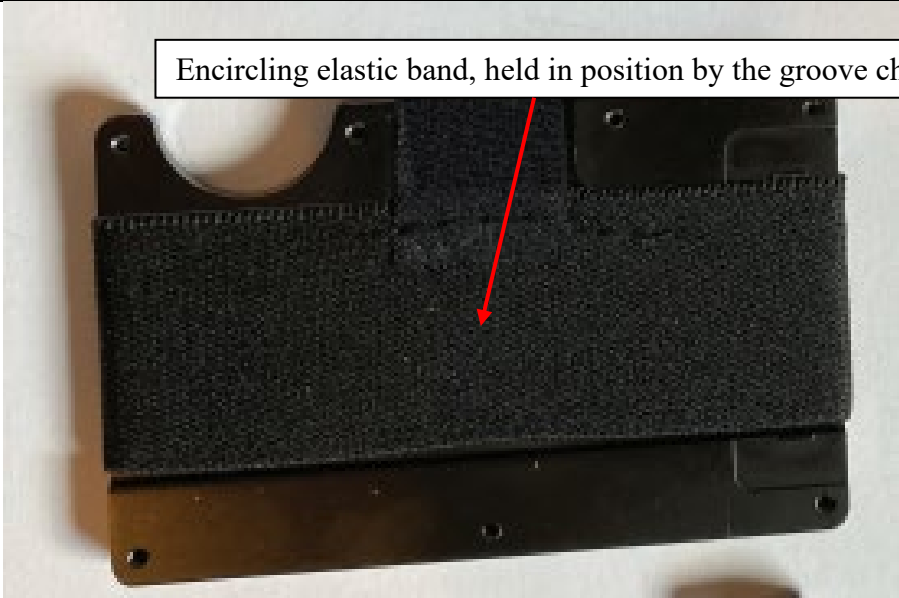
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Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		
14b	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	The SMCII has 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.

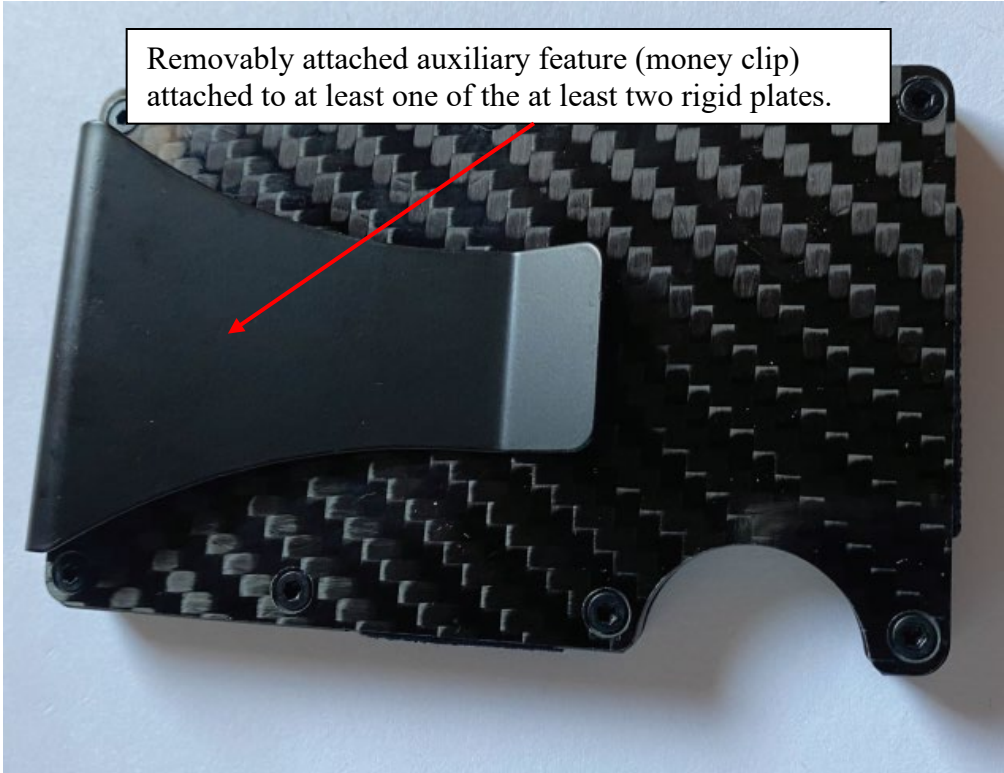
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
	entire running length thereof; and	 The photograph shows a rectangular object with a dark, woven, carbon-fiber-like texture. A red double-headed arrow at the top indicates the 'Longitudinal Extent'. Below the photograph is a technical drawing of a similar device. The drawing shows two parallel horizontal lines representing 'Two rigid plates biased inwardly', with a red arrow pointing to them. Above these plates is a wavy line representing the 'Encircling Elastic Band'. Dimensions '1.18' and '2.50' are shown on the right side of the drawing.

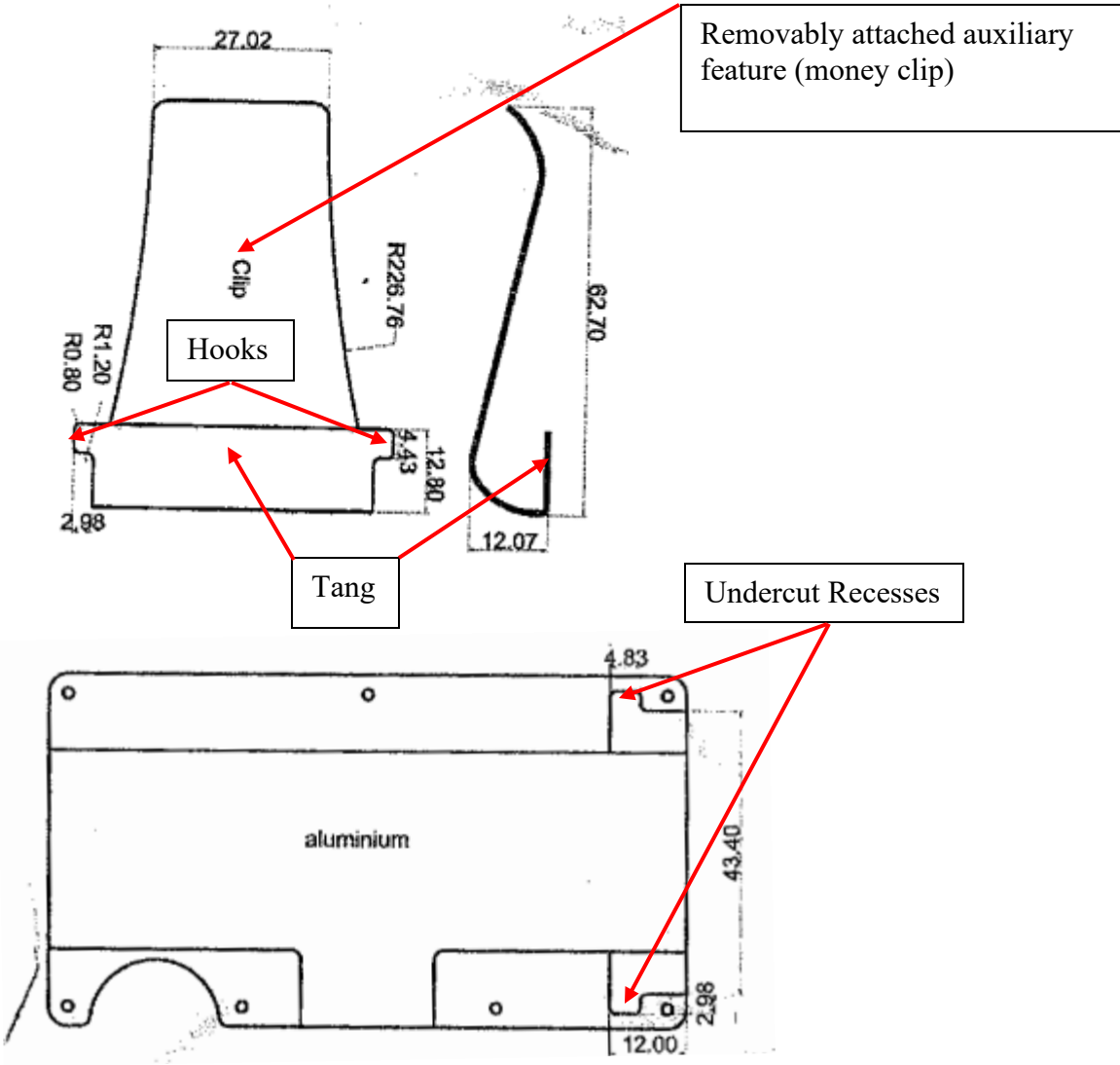
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		
14c	a recess formed inside at least one of the at least two rigid	The SMCII has 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

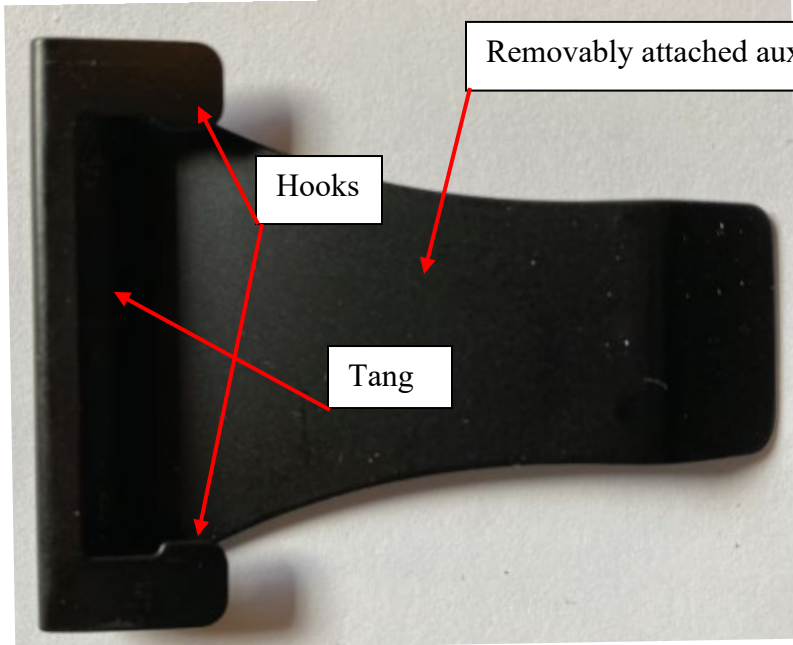
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
	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,	formed inside a rigid plate, 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.  Removably attached auxiliary feature (money clip) attached to at least one of the at least two rigid plates.

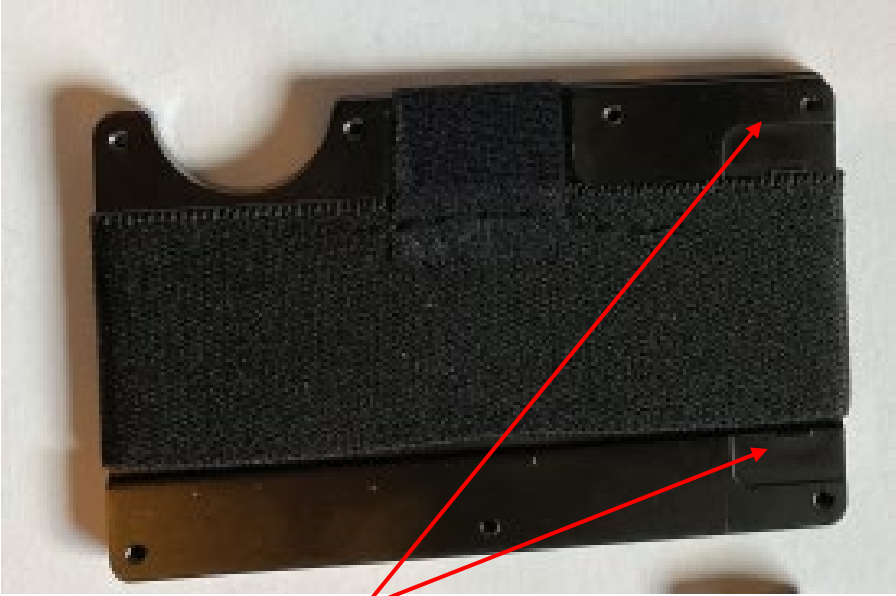
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 The image contains two technical drawings. The top drawing is a side view of a money clip with dimensions: 27.02 (width), 62.70 (height), R226.76 (radius), 12.80 (width), 12.07 (width), 4.43 (width), 2.98 (width), R1.20 (radius), and R0.80 (radius). A red arrow points to the clip itself, labeled 'Clip'. Another red arrow points to the two curved ends, labeled 'Hooks'. A third red arrow points to a small protrusion, labeled 'Tang'. A fourth red arrow points to a recessed area, labeled 'Undercut Recesses'. A fifth red arrow points to a feature on the right side, labeled 'Removably attached auxiliary feature (money clip)'. The bottom drawing is a top view of an aluminum housing with dimensions: 4.83 (width), 43.40 (height), 2.98 (width), and 12.00 (width). The word 'aluminium' is written in the center. Red arrows point to two recessed areas, labeled 'Undercut Recesses'.

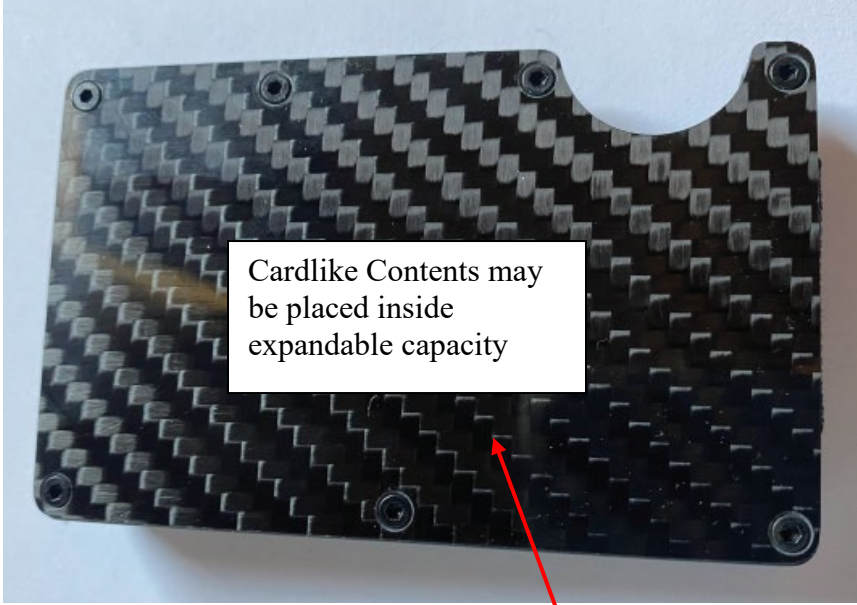
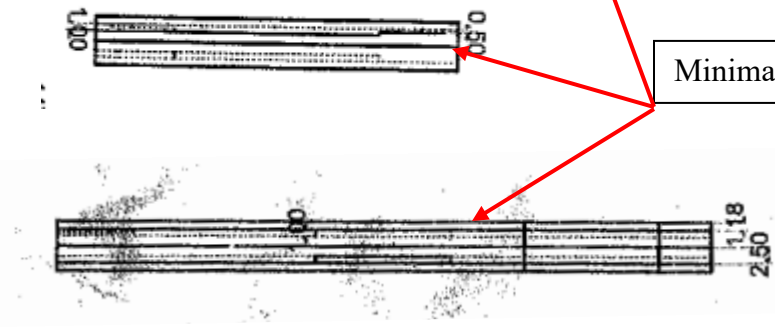
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 Removably attached auxiliary feature (money clip) Hooks Tang

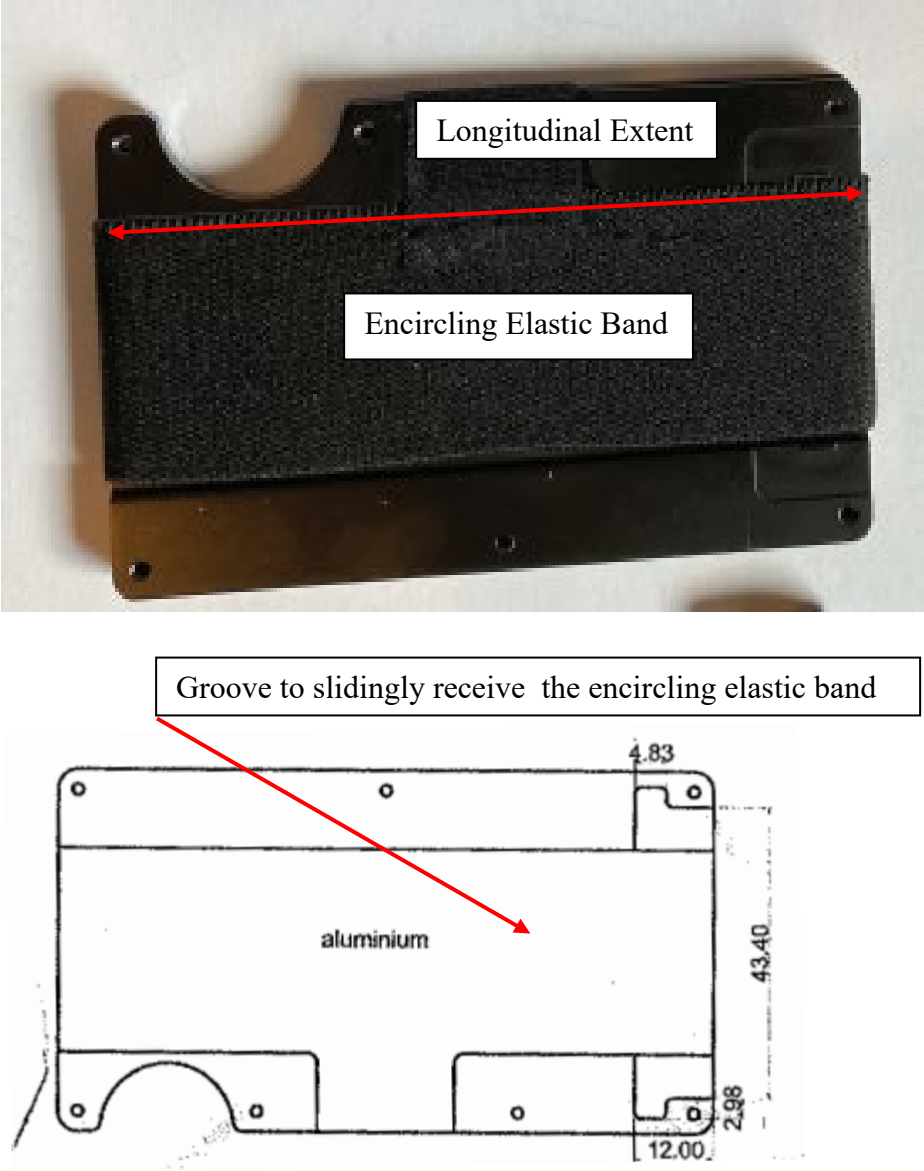
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 Undercut Recesses
14d	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.	The SMCII enables card-like contents to 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.

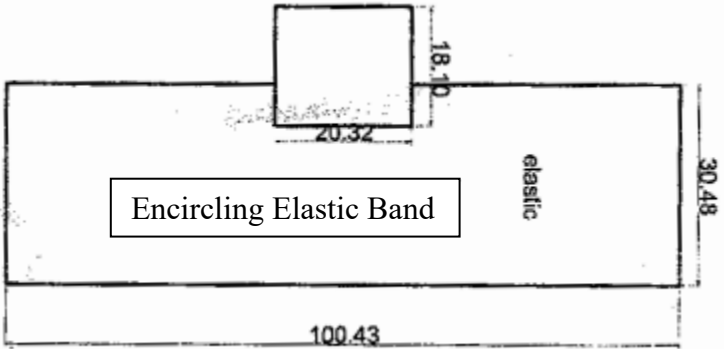
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 Cardlike Contents may be placed inside expandable capacity  Minimal Silhouette
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 slidingly receiving	The SMCII has a longitudinal groove in a first lamina of a laminate construction of each rigid plate, the groove slidingly receiving one part of the at least one encircling elastic band.

Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
	one part of the at least one encircling elastic band	 The photograph shows a black, rectangular Smart Money Clip II (SMCII) with a dark, textured encircling elastic band. A red double-headed arrow indicates the longitudinal extent of the band. A technical drawing below shows a cross-section of the clip, labeled 'aluminium'. A red arrow points to a groove designed to receive the elastic band. Dimensions are provided: 4.83 for the top edge, 43.40 for the overall height, 2.98 for the bottom edge, and 12.00 for the width of the bottom flange.

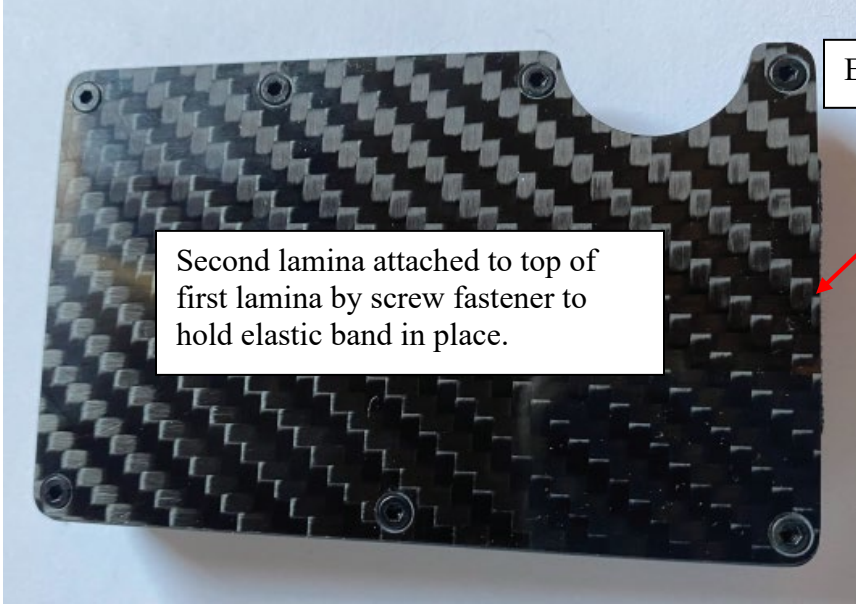
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 The diagram shows a rectangular elastic band with a central rectangular opening. The dimensions are: top width 18.10, top opening width 20.32, right height 30.48, and bottom width 100.43. The band is labeled 'elastic' and '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	The SMCII has 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.

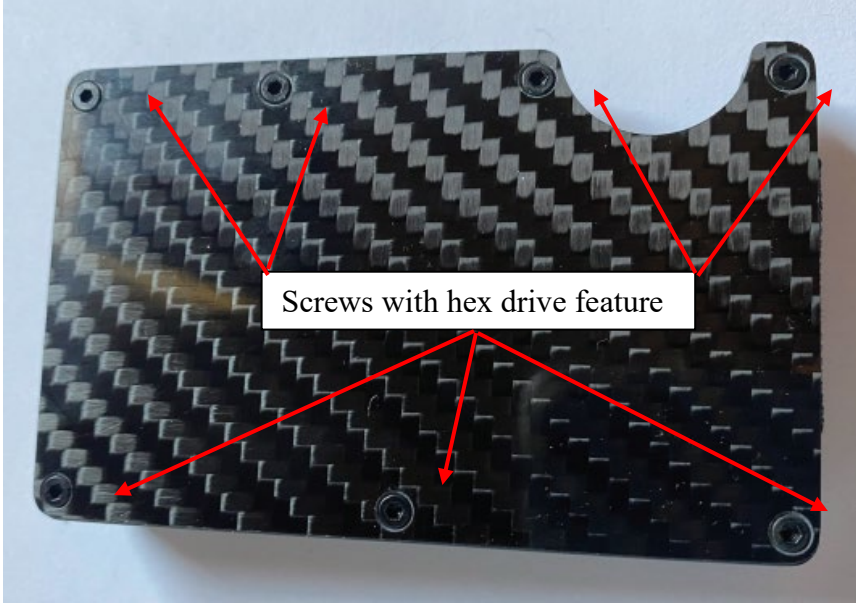
Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		Second lamina that attaches to first lamina to capture the elastic band. Provides a smooth surface for glide purposes First lamina with groove to hold elastic band.

Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		 Second lamina attached to top of first lamina by screw fastener to hold elastic band in place. Elastic band held in place
17	The compact wallet of claim 16, wherein the second lamina is attached to the first lamina by screws	The SMCII has a first lamina and second lamina which are attached together by screws.

Ex. C
Comparison of U.S. Patent No. 10,791,808 and the Smart Money Clip II ("SMCII")

CL. NO.	'808 CLAIM ELEMENT	EXEMPLARY PRIOR ART DISCLOSURE
		

Appendix A



KIMBERLY K. CAMERON, Ph.D., P.E.

PRINCIPAL

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Dr. Kimberly Cameron is a Principal for ESI in the Mechanics and Materials practice. She specializes in design, failure analysis, and risk assessments of engineering structures and components. She has conducted hundreds of investigations on a wide variety of engineering structures, from miniature biomedical devices to large scale process equipment. She has also taught classes for engineers preparing to take the fundamentals of engineering exam and the professional engineering licensing examination in both Civil Engineering and Mechanical Engineering.

Dr. Cameron has performed design and damage tolerance evaluations on biomedical devices, pipelines, consumer electronics, consumer products, aircraft structures, industrial machinery, power-plant components, solar panels, pressure vessels, and vehicle components. Dr. Cameron also has extensive experience evaluating pipe-soil interactions, mechanical and welded joints, welding procedures, in-line inspection tools, regulatory compliance, and the overall integrity of pipeline systems. She has evaluated operating and maintenance procedures, control room management programs and pipeline leak detection plans. The common thread in each of Dr. Cameron's investigations is the application of the fundamentals of metallurgy, materials science, engineering physics, computational mathematics, and engineering mechanics to help understand and solve complex problems.

Dr. Cameron is a registered patent agent, with experience in both the patent application process, as well as intellectual property disputes. In particular, she has experience in biomedical, automotive, electrical, mechanical, and materials science fields and has provided numerous invalidity and infringement reports. She has testified in federal and state court as well as in front of the ITC and in arbitration.

Areas of Specialization

Metallurgy	Product Design	Oil & Gas
Plastics & Composites	Structural Engineering	Energy & Power
Corrosion	Product Recalls	Biomedical Devices
Materials Selection	Root Cause Investigations	Consumer Products & Electronics
Mechanical Engineering	Regulatory Compliance	Automotive & Aviation
Intellectual Property Matters	Failure Analysis	Electrical Equipment

Education

Ph.D. Mechanical Engineering, minor Materials Science & Engineering, Stanford University, CA, 2004

M.S. Mechanical Engineering, Stanford University, CA, 2000

B.S.E. Mechanical and Aerospace Engineering. Certificates: Engineering Physics, Applied & Computational Mathematics, Materials Science & Engineering, Woodrow Wilson School of Public Policy & International Affairs, Princeton University, NJ, 1999

June 2022

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Licensed Professional Engineer (P.E.)

Mechanical Engineer, State of California License No. 33732

Metallurgical Engineer, State of California.....License No. 1969

Professional Affiliations/Honors

American Society of Mechanical Engineers

Member

The Minerals, Metals & Materials Society

Member

Department of Defense

Fellowship

National Science Foundation

Fellowship

Lucent Technologies

Graduate Fellowship

Positions Held

Engineering Systems Inc., Sunnyvale, California

Principal, Mechanics, 2011 – Present

Exponent, Menlo Park, California

Senior Engineer, Mechanics & Metallurgy, 2004 – 2011

Publications/Presentations

“Crack Growth and Arrest in Steam Turbine Casings,” EPRI 3002003504, EPRI, Palo Alto, CA, December 2014.

M. H. Anderson, D. Cislo, J. Saavedra, and **K. Cameron**, Why International Inventors Might Want to Consider Filing Their First Patent Application at the United States Patent Office & the Convergence of Patent Harmonization and E-Commerce, 30 Santa Clara High Tech. L.J. 555 (2014).

“Increasing Reliability of Small Punch Fracture Toughness Testing with Acoustic Emission Monitoring,” Proceedings, 3rd International Conference on Small Sample Test Techniques, September 2014. (with D. Purdy and J. Foulds).

“Small Punch Fracture Toughness Evaluation of Combustion Turbine Materials,” EPRI 3002001468, EPRI, Palo Alto, CA, December 2013. (with D. Purdy, J. Foulds and J. Rodgers).

- “Small Punch Testing for Fracture Toughness” by J. Foulds, J. Rodgers, **K. Cameron** and P. Sullivan, EPRI, Palo Alto, CA: 2013. 3002000250.
- “The Effect of Low Sulfur Content on the Weldability of Linepipe Steel” by **K. Cameron** and A.M. Pettinger, Proceedings of the 9th International Pipeline Conference, September 2012.
- “Effectiveness of Hydrostatic Testing for High Strength Pipe Material” by **K.K. Cameron** & A.M. Pettinger, Proceedings, 8th International Pipeline Conference, October 2010.
- “Axial Loads from Soil Movement Challenge Pipeline Integrity” by **K.K. Cameron** & A.M. Pettinger, PipeLine Gas Technology, November 2009.
- “Assessing Pipeline Integrity Using Fracture Mechanics and Currently Available Inspections Tools” by **K.K. Cameron** & A.M. Pettinger, Journal of Pipeline Engineering, October 2009.
- “Assessing Pipeline Integrity Using Fracture Mechanics and Currently Available Inspections Tools” by **K.K. Cameron** & A.M. Pettinger, Proceedings, 2008 Evaluation and Rehabilitation of Pipelines Conference, Clarion Technical Conferences, Scientific Surveys Ltd., Prague, Czech Republic, October 2008.
- “Fatigue Damage in Bulk Metallic Glass I: Simulation” by **K.K. Cameron** & R. Dauskardt, Scripta Materialia 2006; 54(3):349–353.
- “Fundamentals of Engineering in a Flash” by **K.K. Cameron**, PPI, August 2006.
- “Transmission Electron Microscopy Structure and Platinum-like Temperature Coefficient of Resistance in a Ruthenate-Based Thick Film Resistor with Copper Oxide” by **K.K. Cameron**, G. Crosbie, J. Jiang, & X. Pan, J. Appl. Phys. 2000; 88:1124–1128.

Selected Project Experience

Medical Devices

Failure analysis, design analysis, material selection, mechanical testing, finite element analysis, fatigue and fracture evaluation, and development of various implantable medical devices including cardiovascular implants (heart valves, stents, catheters, pacemakers), orthopedic implants (screws, plates, pins, hip implants, spinal implants), cranial implants, etc.

Design and failure analysis of various fluid and drug delivery systems including implantable pumps, drug eluting stents, syringes, patches, microneedles, CPAP machines, anesthesia machines, insulin and other drug delivery pumps, balloon respirators, etc.

Design and failure analysis of other types of medical devices including surgical tools, scooters, hospital beds, physical therapy equipment, etc.

Performed analyses to support FDA submissions.

Pipelines

Evaluated the design, pipeline integrity management program, in-line inspection tools, leak detection systems, control room management and operation and maintenance practices, of both liquid and gas pipeline systems under both 49 CFR 195 and 192.

Evaluated pipeline construction practices of various pipeline systems and performed pipeline failure investigations after various landslide events.

Assisted the Inter-American Development Bank with a pipeline integrity study and with the supervision of the implementation of a pipeline integrity management program for a pipeline operator. The investigation integrated geotechnical site investigations, metallurgical investigations, in-line inspection data, external pipe inspection data, and fracture mechanics to perform a root cause analysis.

Evaluated welding procedures and determined the effect of welding defects and other construction factors on pipeline integrity.

Investigated pipe soil interactions occurring during hydrostatic testing of pipelines and the evaluation of pipeline ruptures and leaks at welded joints.

Investigated the operation and maintenance procedures of pipelines that are located in close proximity to other infrastructure (electrical equipment, coal mines, water distribution, other pipelines, etc.)

Failure analysis of various insulated steel oil and water pipeline systems, including behavior of the polyurethane foam and jacket materials.

Design evaluation and failure analyses of pipe couplings and fittings, including finite element analyses.

Performed design and failure analyses of various gas distribution systems made of polyethylene and steel pipe, including the analysis of pipe-soil interactions, failure analysis of various components, evaluation of welding and construction practices, and performance evaluation of compression couplings.

Performed failure analysis and finite element analyses of various water distribution systems including various fire sprinkler systems, water supply systems and couplings, and a ten foot wide water main.

Retained as an expert for the United States Patent and Trademark Office in the evaluation of a patent claim dispute relating to large diameter pipes.

Energy & Power

Assisted the general contractor of a nuclear power plant where a large pipe of the primary circuit was vibrating excessively, significantly reducing the allowable power production.

Evaluated the design of a hydrogenerator system. Performed a finite element analysis and fatigue analysis of the rotors, thrust bridge, and head cover to assess the design.

Developed a three-dimensional model of the control rod drive mechanism nozzle penetration in a nuclear reactor pressure vessel head. Evaluated welding-induced residual and operational stresses.

Evaluated the design of various pumps, rotors, bearings, seals and insulation systems.

Performed stress analysis of various solar panel system components and assisted in design changes to meet standardized safety testing.

Performed a stress analysis to evaluate the effects of tightening torques on a ton container valve.

Performed numerical simulation and small punch testing to evaluate fracture toughness and tensile behavior of miniature surface samples from a steam turbine rotor bore and from medical device plastics.

Consumer Products and Electronics

Developed testing protocols, and conducted failure analyses and design reviews for various consumer electronic devices and accessories, electrical connectors, power cords, and jacket sleeves.

Evaluated the material selection and performance for various components of several consumer electronic devices including phones, tablets, and computers.

Design and failure analyses of various electronic components.

Design evaluation and stress analysis of various consumer products, including washing machines, refrigerators, baby chairs and other child containment products, hand tools, security and display systems, microwave ovens, coffee machines, exercise machines, etc.

Automotive and Aviation

Performed fracture and fatigue analyses of aircraft structures.

Performed welding and structural evaluation of various automotive components including semitrailers.

Investigated the manufacturing procedures of electromagnetic latches used in aerospace applications.

Evaluated the design of a diode on a solar panel and various other components for space applications.

Performed fitness for service and design evaluations for welds in various applications, including in fuel storage tanks, process reactor vessels, scaffoldings, semitrailers, and other automotive components.

Appendix B



KIMBERLY K. CAMERON, Ph.D., P.E.
PRINCIPAL

kkcameron@engsys.com

PROJECT	STATE	
<u>2023</u>		
Novo Nordisk Inc. and Novo Nordisk AS v. Teva Pharmaceuticals f/k/a Teva Development, USA, Inc. . Civil Action. No. 21-1782 (CFC) United States District Court for the District of Delaware	DE	(deposition)
Hoya Corporation and Hoya Surgical Optics, Inc. v. Alcon Inc., Alcon Laboratories, Inc., and Alcon Research, LLC Case No. 3:20-cv-03629 5 th Circuit, US District Court for the Northern District of Texas	TX	(deposition)
International Medical Devices, Inc. v. Robert Cornell, M.D., et al Case No. 2:20-cv-03503-CBM (RAOx) United States District Court Central District of California – Western Division	CA	(trial)
In the Matter of Certain Compact Wallets and Components Thereof Investigation No. 337-TA-1355 United States International Trade Commission Washington, D.C.	D.C.	(deposition)
EIS Inc. v. IntiHealth Ger GmbH, Wow Tech USA, Ltd.; WOW Tech Canada, Ltd.; Novoluto GmbH; Novoluto GmbH; Triple A Import GmbH; and Triple A Marketing GmbH Civil Action No. 19-CV-12279 (GBW)(MPT) United States District Court for the District of Delaware	DE	(deposition)
Envirotainer AB v. Doubleday Acquisitions, LLC Case No. IPR2022-00864 Case No. IPR2022-00851 United States Patent and Trademark Office Before the Patent Trial and Appeal Board	D.C.	(deposition)
Victualic v. ASC Engineered Solutions, LLP Case No. 1-20-CV-00887-CFC United States District Court for the District of Delaware	DE	(trial)
Echologics, LLC, Mueller International, LLC, and Mueller Canada, LTD. d/b/a Echologics v. Orbis Intelligent Systems, Inc. Case No. 3:21-cv-01147-RBM-AHG United States District Court Southern District of California	CA	(deposition)
Wonderland Switzerland AG v. Evenflo Company, Inc. Civil Action No. 1:20-cv-00727-JPM United States District Court for the District of Delaware	DE	(trial)



2022

In the Matter of Certain Playards and Strollers Investigation No. 337-TA-1288 United States International Trade Commission	D.C.	(trial)
EIS Inc. v. IntiHealth Ger GmbH, Wow Tech USA, Ltd.; WOW Tech Canada, Ltd.; Novoluto GmbH; Novoluto GmbH; Triple A Import GmbH; and Triple A Marketing GmbH Civil Action No. 19-cv-1227-VAC United States District Court for the District of Delaware	DE	(trial)
Envirotainer AB v. Doubleday Acquisitions, LLC Case No. IPR2022-00292 Case No. IPR2022-00293 United States Patent and Trademark Office Before the Patent Trial and Appeal Board	D.C.	(deposition)
In the Matter of Certain Playards and Strollers Investigation. No. 337-TA-1288 United States International Trade Commission	D.C.	(deposition)
Timothy Johnson v. LA Fitness; Fitness International LLC Case No. 30-2019-01059520 Superior Court for the State of California for the County of Orange	CA	(trial)
Ultra-Mek, Inc. v. United Furniture Industries, Inc.; Oiseys International, Inc.; Taizhou Chenguang Vehicle Co., LTD; Man Wah (USA), Inc.; Man Wah Holdings LTD; Remarco Machinery Technology Co., LTD; and Jiangsu Yulong Smart Technology Co., LTD Case No. 1:18-cv-281-WO-JEP United States District Court for the Middle District of North Carolina	NC	(deposition)
Victualic v. ASC Engineered Solutions, LLP Case No. 1-20-CV-00887-CFC United States District Court for the District of Delaware	DE	(deposition)
Unirac, Inc. v. Ecofasten Solar, LLC and ESDEC, Inc. Case No. 1:21-CV-000058 Case No. 1:21-CV-000059 United States District Court for the District of Delaware	DE	(deposition)
Transcontinental Gas Pipe Line Company LLC v Latex Construction Company Case No. CJ-2019-3611 In the District Court in and for Tulsa County State of Oklahoma	OK	(deposition)
Antonio Barrera and Martha Barrera v. Southern California Edison Company, Robert K. Laird and Rebecca F. Clark Case No. CIVDS1700188 Superior Court of the State of California County of San Bernardino, San Bernardino District	CA	(deposition)



**Regeneron Pharmaceuticals, Inc. v. Novartis Pharma AG,
Novartis Technology LLC, Novartis Pharmaceuticals Corporation** D.C. (deposition)
Case No. IPR2021-00816
United States Patent and Trademark Office Before the
Patent Trial and Appeal Board

Wonderland Switzerland AG v. Evenflo Company Inc. DE (deposition)
Case No. 20-727-RGA
United States District Court for the District of Delaware

Wonderland Switzerland AG v. Evenflo Company Inc. DE (deposition)
Case No. 20-727-RGA
United States District Court for the District of Delaware

Wonderland Switzerland AG v. Evenflo Company Inc. DE (deposition)
Case No. 20-727-RGA
United States District Court for the District of Delaware

Timothy Johnson v LA Fitness; Fitness International LLC CA (deposition)
Case No. 30-2019-01059520
Superior Court for the State of California for the County of Orange

2021

Novo Nordisk Inc. and Novo Nordisk AS v. Sandoz Inc. DE (deposition)
Case No. 20-747-CFC
United States District Court for the District of Delaware

International Medical Devices, Inc. v. Robert Cornell, M.D., et al CA (deposition)
Case No. 2:20-cv-03503-CBM (RAOx)
United States District Court
Central District of California – Western Division

Marathon Pipe Line LLC. v. Energy Transfer L.P, et al IL (deposition)
Case No. 2021CH14
In The Circuit Court Fourth Judicial Circuit
Marion County, Illinois

**In The Matter Of Certain Electrical Connectors and Cages,
Components Thereof, And Products Containing The Same** D.C. (trial)
Investigation No. 337-TA-1241
United States International Trade Commission

**Hoya Corporation and Hoya Surgical Optics, Inc. v.
Alcon Inc., Alcon Laboratories, Inc., and Alcon Research, LLC** TX (deposition)
Case No. 3:20-cv-03629
5th Circuit, US District Court for the Northern District of Texas

**In the Matter of Certain Electrical Connectors and Cages,
Components Thereof, and Products Containing the same** D.C. (deposition)
Investigation No. 337-TA-1241
United States International Trade Commission



Cherelus (Genicia) vs Columbia Hospital Corporation of South Broward D/B/A Westside Regional Medical Center; Ravishankar Shivashankar, M.B.B.S.; Envision Healthcare Corporation; Radiology Physician Solutions of Florida, LLC; and Penumbra, Inc FL (deposition)

Case No. CACE-19-002780
Circuit Court of the 17th Judicial Circuit, Broward County, Florida

In the Matter of: Certain Blowers and Components Thereof MO (trial)
Investigation No. 337-TA-1217
Enforcement Proceeding
United States International Trade Commission

Novo Nordisk Inc. and Novo Nordisk AS v. Mylan Institutional LLC DE (deposition)
Case No. 19-01551-CFC
United States District Court for the District of Delaware

2020

In the Matter of: Certain Portable Gaming Console Systems With Attachable Handheld Controllers and Components Thereof II D.C. (trial)
Investigation No. 337-TA-197
United States International Trade Commission

In the Matter of: Certain Collapsible and Portable Furniture D.C. (trial)
Investigation No. 337-TA-1178
United States International Trade Commission

In the Matter of: Certain Portable Gaming Console Systems With Attachable Handheld Controllers and Components Thereof II D.C. (deposition)
Investigation No. 337-TA-197
United States International Trade Commission

Ultra-Mek, Inc. v. United Furniture Industries, Inc.; Oiseys International, Inc.; Taizhou Chenguang Vehicle Co., LTD; Man Wah (USA), Inc.; Man Wah Holdings LTD.; Remarco Machinery Technology Co., LTD; and Jiangsu Yulong Smart Technology Co., LTD. NC (deposition)
Case No. 1:18-cv-281-WO-JEP
United States District Court for the Middle District of North Carolina

In the Matter of: Certain Collapsible and Portable Furniture MO (deposition)
Investigation No. 337-TA-1178
United States International Trade Commission

2019

Andrews, et al v. Plains All American Pipeline, L.P. et al CA (deposition)
No. 2:15-cv-04113-PSG-JEM
United States District Court, Central District of California

Mobile Tech, Inc. v. Sennco Solutions, Inc. MO (deposition)
No. IPR2018-01218
United States Patent and Trademark Office

Appendix C

Materials Considered

U.S. Patent 9,125,464 (“Minn”)

U.S. Patent 7,527,081 (“Coates”)

U.S. Patent No. 5,944,080 (“Podwika”)

U.S. Patent 7,334,616 (“Kaminski”)

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

U.S. Patent 5,103,884 (“Roman”)

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

KickStarter The Ridge Wallet 2.0 (“Kane”)

Smart Money Clip II (“SMCII”)

U.S. Application No. 14/706,019 21

U.S. Patent Application 15/421,596

File History of U.S. Patent 10,791,808 and documents cited within

Complainant’s Opening Claim Construction Brief and Exhibits

Respondent’s Opening Claim Construction Brief and Exhibits

Commission Investigative Staff’s Opening Claim Construction Brief

Commission Investigative Staff’s Claim Construction Responsive Brief

Complainant’s Responsive Claim Construction Brief and Exhibits

Respondent’s Responsive Claim Construction Brief and Exhibits

Other materials cited in Dr. Cameron’s Expert Report

Appendix D

Appendix E

1 Stephen M. Lobbin (SBN 181195)
sml@smlavvocati.com
2 Austin J. Richardson (SBN 319807)
ajr@smlavvocati.com
3 **SML Avvocati P.C.**
888 Prospect Street, Suite 200
4 San Diego, CA 92037
Tel: 949.636.1391

5 Attorneys for Plaintiff

6
7
8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10 **WESTERN DIVISION**
11

12 **Mosaic Brands, Inc.**, a Delaware
13 corporation,

14 Plaintiff,

15 v.

16 **The Ridge Wallet LLC**, a California
company,

17 Defendant.
18

Case No. 2:20-cv-04556-AB-JC

**DECLARATION OF SCOTT
KAMINSKI IN OPPOSITION TO
MOTION FOR SUMMARY
ADJUDICATION**

Date: April 23, 2021

Time: 10:00 a.m.

Ctrm: 7B

Honorable André Birotte Jr.

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20 I, Scott Kaminski, declare and state as follows:

21 1. I work with Plaintiff Mosaic Brands, Inc. ("Storus"), a division of
22 which does business as "Storus" with its e-commerce site <storus.com>. I have
23 personal knowledge of the facts stated herein, and if called to testify as a witness, I
24 could and would testify competently thereto.

25 2. A true and correct copy of U.S. Patent No. 10,791,808 ("the '808
26 patent") is attached herewith as Exhibit 1.
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1 3. Storus first sold the “Smart Money Clip II” design in 2011 (“SMCII”).
2 True and correct images of a disassembled view of the product sold in 2011 are
3 attached herewith as Exhibit 2. The design of the SMCII product (which is
4 currently branded as the “Smart Wallet”) had remained relatively unchanged from
5 2011 through the present, with a new version sold without removable plates and
6 money clips only being offered for sale since 2021.

7 4. We exhibited the SMCII product design in January 2011 at the annual
8 PGA Show in Orlando, Florida, which had many thousands of attendees. We sold
9 many units of the product at the show directly from our exhibit booth, and following
10 the show we sold many more. Attached herewith as Exhibit 3 is a true and correct
11 copy of several invoices for some of these 2011 sales of the SMCII product. The
12 product is described in the invoice as “Smart Money Clip II – carbon fiber wallet
13 (with engraving, in black box, no window).” The SMCII (including its current
14 iteration) is the only carbon fiber wallet ever sold by Storus.

15 5. A true and correct copy of design plans created on October 19, 2010
16 are attached herewith as Exhibit 4. The only differences between this design and the
17 final product is that the shape of the clip was changed to a “beer glass” shape for the
18 money clip, with the hooks pointed inward towards the elastic band, and a matching
19 overhang on the corresponding plate.

20 6. The SMCII had the same design from 2011 to the present.

21 7. A true and correct copy of a disassembled “Smart Money Clip Lite” is
22 attached herewith as Exhibit 5.

23 8. A true and correct copy of U.S. Patent No. 5,103,884 is attached
24 herewith as Exhibit 6.

25 9. A true and correct copy of an article published on March 2, 2006 about
26 the Jimi Wallet is attached herewith as Exhibit 7. A true and correct copy shop page
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1 for the Jimi wallet from May 9, 2007 (saved from the Internet Archive) is attached
2 herewith as Exhibit 8.

3 10. A true and correct copy of the Ridge 2.0 Kickstarter campaign is
4 attached herewith as Exhibit 9.

5 11. A true and correct copy of a draft transcript of the non-confidential
6 portions of the Rule 30(b)(6) deposition of Defendant The Ridge Wallet LLC taken
7 on April 15, 2021 is attached herewith as Exhibit 10.

8 12. A true and correct copy of the file history for the '808 patent is
9 attached herewith as Exhibit 11.

10 13. Attached herewith as Exhibit 12 is an invalidity claim chart ("Claim
11 Chart"). I assisted in preparing the analysis reflected therein, and I have personal
12 knowledge of the correspondence of the prior art features to the claim elements,
13 including as a person of ordinary skill in the art.

14 14. Both the SMCII and the wallet disclosed in the '808 patent are
15 compact wallets.

16 15. Just as recited in the '808 patent claims, the SMCII has two rigid
17 plates interposed to sandwich card-like contents there between, with each rigid
18 plate having a longitudinal extent.

19 16. Just as recited in the '808 patent claims, the SMCII has at least one
20 encircling elastic band interposed with two rigid plates along longitudinal extents
21 thereof to bias them inwardly and securely hold the card-like contents while
22 providing elastic volume there between for adding or removing contents.

23 17. Just as recited in the '808 patent claims, the SMCII has a channeling
24 means configured to minimize the wallet's profile and hold the position of the
25 encircling elastic band with respect to each plate, while allowing the entire band to
26 extend and contract over the length of the whole band. The channel is a groove
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1 spanning the extent of the rigid plates or a longitudinal bore through each rigid
2 plate.

3 18. Just as recited in the '808 patent claims, the SMCII has at least one
4 encircling elastic band slidingly interposed in the grooves to bias the at least two
5 rigid plates inwardly and securely hold the card-like contents while providing
6 elastic volume there between for adding or removing contents, the grooves
7 configured to hold position of the at least one encircling elastic band with respect
8 to each rigid plate while allowing freedom for the dynamic extension and
9 contraction of the band over the entire running length.

10 19. Just as recited in the '808 patent claims, the SMCII has an auxiliary
11 feature removably attached to one of the two rigid plates, the auxiliary feature
12 having a tang insertable into a recess formed inside the rigid plates, the tang having
13 a hook, the hook extending at an angle to the tang, the hook engaging an undercut
14 of the recess to prevent inadvertent dislodgement of the auxiliary feature from the
15 recess.

16 20. Just as recited in the '808 patent claims, the SMCII enables card-like
17 contents to be carried with minimal silhouette on or with a person while allowing
18 expandable capacity and ready access to individual contents from between the at
19 least two rigid plates.

20 21. Just as recited in the '808 patent claims, the SMCII has a longitudinal
21 groove in a first lamina of a laminate construction of each rigid plate, the groove
22 slidingly receiving one part of the at least one encircling elastic band.

23 22. Just as recited in the '808 patent claims, the SMCII has a second
24 lamina of the laminate construction of each rigid plate is removably attached to the
25 first lamina to hold the at least one elastic band in capture and provide a smooth
26 surface for glide purposes.

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1 23. Just as recited in the '808 patent claims, the rigid plate of the SMCII
2 is comprised of metal for RFID protection, specifically aluminum.

3 24. Just as recited in the '808 patent claims, the SMCII has a first elastic
4 strap positioned over the ends of the at least two rigid plates transverse to the
5 longitudinal extents, the positioning functioning to retain the card-like contents
6 from that end.

7 25. Just as recited in the '808 patent claims, the elastic bands of the
8 SMCII are comprised of woven elastic fabric.

9 26. Just as recited in the '808 patent claims, the SMCII has a first lamina
10 and second lamina which are attached together by screws.

11 27. The Smart Money Clip Lite has a recess formed inside at least one rigid
12 plate, the recess operable to receive a tang of an auxiliary feature, the recess having
13 an undercut operable to engage a hook of the tang to prevent inadvertent
14 dislodgement of the auxiliary feature from the recess when the auxiliary feature is
15 positioned in at least one of the at least two rigid plates, the hook extending at an
16 angle to the tang.

17 28. A person of ordinary skill in the art would find it obvious to combine
18 Ridge's published Kickstarter with U.S. Patent No. 5,103,884 and either U.S. Patent
19 No. 7,334,616 or the SMCLite to obtain the wallet claimed in the '808 patent, as it
20 would be obvious to combine these standard features of compact wallets at the time
21 the '808 patent was filed.

22 29. A person of ordinary skill in the art would find it obvious to combine
23 Ridge's published Kickstarter with the Jimi Wallet and either U.S. Patent No.
24 7,334,616 or the SMCLite to obtain the wallet claimed in the '808 patent, as it
25 would be obvious to combine these standard features of compact wallets at the time
26 the '808 patent was filed.

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1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct and if called to testify, I could and
3 would competently do so.

4 Executed on this 16th day of April 2021 at Alamo, California.

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7 By:  _____
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1 **CERTIFICATE OF SERVICE**

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4 I hereby certify that on April 16, 2021, I electronically transmitted the
5 foregoing document using the CM/ECF system for filing, which will transmit the
6 document electronically to all registered participants as identified on the Notice of
7 Electronic Filing, and paper copies have been served on those indicated as non-
8 registered participants.

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11 /s/ Stephen M. Lobbin

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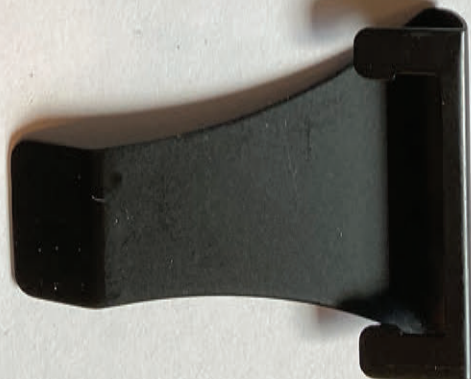
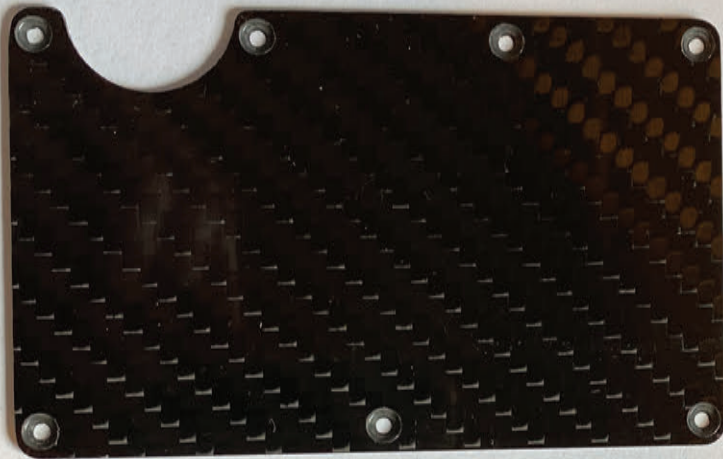
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Appendix F

EXHIBIT 2









Appendix G

**UNITED STATES INTERNATIONAL TRADE COMMISSION
Washington, D.C.**

**Before the Honorable Bryan F. Moore
Administrative Law Judge**

In the Matter of

**CERTAIN COMPACT WALLETES AND
COMPONENTS THEREOF**

Inv. No. 337-TA-1355

PROPOSED CLAIM CONSTRUCTION CHART

Pursuant to the Procedural Schedule (Order No. 7) and Ground Rule 7.4, Complainant The Ridge Wallet LLC (“Ridge”), the Commission Investigative Staff (“Staff”), and Respondents Shenzhen Swztech Co., Ltd. d/b/a SWZA (“SWZA”), Shenzhen Pincan Technology Co., Ltd. d/b/a ARW (“ARW”) and Mosaic Brands, Inc. d/b/a STORUS (“Mosaic”) (collectively, the “Parties”) respectfully submit their proposed claim construction chart incorporating any revisions as of the date hereof. The Parties reserve the right to modify or otherwise amend these proposed constructions in light of future developments in this Investigation.

Table 1 summarizes the agreements the Parties have reached with regard to all by three (3) terms that were originally in dispute:

TABLE 1: MUTUALLY AGREED CONSTRUCTIONS	
Claim Term (Asserted Independent Claims)	Agreed Construction (Complainant, Staff, Respondents SWZA, ARW and Mosaic¹)
“channeling means” (Claim 1)	<u>Function</u> : “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 of the dynamic extension and contraction of the band over the entire running length thereof”

¹ Two respondents (RossM and INSGG) have not participated in this investigation, and have been ordered to show cause as to why they should not be found in default by June 30, 2023.

	Structure: “a groove spanning the extent of one or more of the rigid plates or a longitudinal bore through one or more of the rigid plates”
“auxiliary feature” (Claims 1, 14)	Plain and ordinary meaning
“undercut” (Claims 1, 14)	Plain and ordinary meaning
“hook” (Claims 1, 14)	Plain and ordinary meaning

Table 2 summarizes the three (3) terms that remain in dispute, including the disputed constructions and the Parties responsible therefor:

TABLE 2: PROPOSED CONSTRUCTIONS		
Claim Term (Asserted Independent Claims)	Complainant and Staff	Respondents SWZA, ARW and Mosaic²
“interposed” (Claims 1, 14)	Plain and ordinary meaning	Indefinite
“minimal silhouette” (Claims 1, 14)	Plain and ordinary meaning	Indefinite
“minimize the profile” (Claim 1)	Plain and ordinary meaning	Indefinite

Dated: June 23, 2023

Respectfully submitted,

/s/ Linda Chang

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Commission Investigative Staff

² Respondent Mosaic originally submitted to the Parties that the remaining disputed terms should be afforded their plain and ordinary meaning. Mosaic has since joined SWZA’s and ARW’s positions through subsequent communications among the Parties.

/s/ Mickey Yao

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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing, PROPOSED CLAIM CONSTRUCTION CHART, has been served upon the following parties as indicated below on this 23rd day of June 2023.

Lisa R. Barton Secretary to the Commission U.S. International Trade Commission 500 E. Street, S.W. Washington, D.C. 20436	☒ EDIS Electronic Filing ☐ Via Hand Delivery ☐ Via Overnight Carrier ☐ Via Electronic Mail ☐ Via U.S. First Class Mail
The Honorable Bryan F. Moore Administrative Law Judge U.S. International Trade Commission 500 E. Street, S.W., Room 317 Washington, DC 20436 Moore337@usitc.gov	☐ Via Hand Delivery ☐ Via Overnight Carrier ☒ Via Electronic Mail ☐ Via File Transfer Protocol (FTP) ☐ Via U.S. First Class Mail
Linda Chang, Esq. Office of Unfair Import Investigations U.S. International Trade Commission 500 E. Street, S.W., Room 317 Washington, DC 20436 (202) 205-2576 Linda.Chang@usitc.gov	☐ Via Hand Delivery ☐ Via Overnight Carrier ☒ Via Electronic Mail ☐ Via File Transfer Protocol (FTP) ☐ Via U.S. First Class Mail
Tao Liu Ruoting Men Glacier Law LLP 41 Madison Avenue, Suite 2529 New York, NY 10010 Tel: 332-208-8882 Fax: 312-801-4587 Email: tao.liu@glacier.law Counsel for Respondent Shenzhen Swztech Co., Ltd.d/b/a SWZA	☐ Via Hand Delivery ☐ Via Overnight Carrier ☒ Via Electronic Mail ☐ Via File Transfer Protocol (FTP) ☐ Via U.S. First Class Mail

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INSGG dongxiaolian No. 553, Wensan Road West Lake District, Room 2019 Zhejiang SME Building, Hangzhou City Zhejiang Province, 330009, China	☐ Via Hand Delivery ☐ Via Overnight Carrier ☐ Via Electronic Mail ☐ Via File Transfer Protocol (FTP) ☒ Via U.S. First Class Mail
Stephen M. Lobbin sml@smlavvocati.com Joshua N. Osborn jno@smlavvocati.com SML Avvocati P.C. 4640 Cass Street #90142 San Diego, California 92019 Tel: 949.636.1391 Counsel for Respondent Mosaic Brands, Inc.	☐ Via Hand Delivery ☐ Via Overnight Carrier ☒ Via Electronic Mail ☐ Via File Transfer Protocol (FTP) ☐ Via U.S. First Class Mail
Rosemar Enterprise LLC d/b/a RossM Wallet Domingo Jesus Romero Perez 67235 Garbino Road Cathedral City, CA 92234 and Rosemar Enterprise LLC d/b/a RossM Wallet 353 Viewcrest Road Bellingham, WA 98229	☐ Via Hand Delivery ☐ Via Overnight Carrier ☐ Via Electronic Mail ☐ Via File Transfer Protocol (FTP) ☒ Via U.S. First Class Mail

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