IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

2985 LLC D/B/A MOUNTAIN VOYAGE COMPANY LLC,

Petitioner,

v.

THE RIDGE WALLET LLC,

Patent Owner

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

Issued: October 6, 2020

Title: COMPACT WALLET

DECLARATION OF

James B. Babcock

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Exhibit No.	Description
1001	U.S. Patent No. 10,791,808 to Kane, Daniel
1002	Declaration of James B. Babcock
1003	Curriculum Vitae of James B. Babcock
1004	Certified Copy of the File History of the '808 Patent, U.S. Patent Application No. 15/421,596.
1005	Certified Copy of the File History of U.S. Patent Application No. 14/706,019.
1006	*The Ridge 2.0*, Kickstarter Campaign by Daniel Kane. Archived on September 3, 2013, by the Wayback Machine: https://web.archive.org/web/20130903204002/http://www.kickstarter.com:80/projects/124039987/the-ridgewallet-20
1007	U.S. Patent Publication No. 2014/0060712 to Beckley
1008	U.S. Patent No. 2,326,558 to Pelz
1009	U.S. Patent Publication No. 2009/0134223 to Matthews
1010	*Mechanisms and Mechanical Devices Sourcebook*. Nicholas P. Chironis. 1991. McGraw-Hill. Page 412.
1011	*More Americans are Joining the 'Cashless' Economy*. Michelle Faverio. 2022. Pew Research Center.
1012	International Application PCT/US16/031472
1013	Claim Construction Order in *Mosaic Brands, Inc. v. The Ridge Wallet LLC*, (2:20-cv-04556), District Court, Central District of California
1014	Claim Construction Order in *Certain Compact Wallets and Components Thereof*, Order No. 14 from ITC Inv. No. 337-1355.
1015	Defendant's Opening Claim Construction Brief, *The Ridge Wallet LLC v. 2985, LLC D/B/A Mountain Voyage Co.,* (1:23-CV-00407), District of Colorado.
1016	*McGraw-Hill Dictionary of Scientific and Technical Terms*. 2003. 6th ed. New York: McGraw-Hill. Page 1759.
1017	*The Merriam-Webster Dictionary.* 2016. Merriam-Webster, Incorporated. Pages 344 and 2221.
1018	Docket, *The Ridge Wallet, LLC. v. 2985 LLC.*, No. 1:23-cv-00407-CNS-SBP (D.C.COLO)

1019	Case Management and Scheduling Order, *The Ridge Wallet, LLC. v. 2985 LLC.*, No. 1:23-cv-00407-CNS-SBP (D.C.COLO), ECF No. 32, April 6, 2023
1020	District Court of Colorado, Judicial Caseload Profile, March 12, 2024
1021	Declaration of Daniel Kane
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1. I, James B. Babcock, hereby declare as follows:

I. INTRODUCTION AND QUALIFICATIONS

2. I have been retained by Vorys, Sater, Seymour and Pease LLP on behalf of 2985 LLC d/b/a Mountain Voyage Co. ("Mountain Voyage") to provide my opinion concerning the validity of Claims 1-9 and 11-21 (the "Challenged Claims") of U.S. Patent No. 10,791,808 (the "'808 Patent") in support of Mountain Voyage's Petition for *Inter Partes* review (the "Petition") of the '808 Patent. (Ex. 1001.)

3. I am compensated at a rate of $510 per hour for my work in this proceeding, and my compensation is in no way contingent on the nature of my findings, the presentation of my findings in testimony, or the outcome of this or any other proceeding. I have no other interest in this proceeding or in Mountain Voyage.

4. A detailed description of my professional qualifications, including a listing of my specialties/expertise and professional activities, is contained in my curriculum vitae, a copy of which is provided as Exhibit 1003. Below is a short summary of my professional qualifications.

5. I have a B.S. in mechanical engineering from Lehigh University (1985) and a M.E. from George Washington University (1993). I am currently President of MechEx, LLC, an engineering and expert witness practice, and a contributing technical expert to *Machine Design* Magazine. In the past, I held the position of V.P. of R&D engineering at Taylor Technologies, Inc., overseeing all aspects of product

development and engineering operations. I have nearly 40 years of mechanical engineering experience.

6. I am a named inventor on the following patents related to mechanical devices: U.S. 7,047,890; U.S. 91,26,381; and U.S. 9,539,785. I have previously served as an expert in over a dozen cases regarding mechanical devices.

7. The statements made and opinions provided in this Declaration are based on my own personal knowledge and, if called as a witness, I could and would testify in a manner consistent with this Declaration.

II. UNDERSTANDING OF THE GOVERNING LAW

A. Invalidity by Obviousness

8. I understand that obviousness of a patent claim requires that the claim as a whole be obvious from the perspective of a person of ordinary skill in the relevant art ("POSITA"), at the time of invention. A claim is unpatentable for obviousness under 35 U.S.C. § 103 (post-AIA) "if the differences between the subject matter sought to be patented and the prior art are such that the subject mater as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains." Obviousness may be based upon a combination of references.

9. I understand that references are analogous to the patent at issue when: (1) the reference is from the same field of endeavor as the claimed invention (even

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if it addresses a different problem); or (2) the reference is reasonably pertinent to the problem faced by the inventor (even if it is not the same field of endeavor as the claimed invention).

10. I understand that obviousness is a legal conclusion. I am testifying to the relevant facts that underlie the legal conclusion, including: the level of skill in the relevant art, the scope and content of the prior art, the differences between the prior art and the claims, and any secondary considerations (*e.g.*, such as commercial success, long-felt but unresolved need, failure of others, industry recognition, copying, and unexpected results).

11. A claim may be unpatentable for obviousness when the invention is a combination of known elements and there is an apparent reason to combine the known elements in the recited fashion from a consideration of: the teachings of prior art references, the effects of demands known to people working in the technological field or present in the marketplace, and the background knowledge possessed by a POSITA.

12. Additionally, one can take account of the inferences and creative steps that a POSITA would employ to meet a known challenge, known market demand, or known technological improvement. For example, a POSITA looking to overcome a problem will often functionally combine the teachings of multiple prior art references. Thus, familiar items may have obvious uses beyond their primary

purposes and practical, common-sense considerations should guide a proper obviousness analysis.

13. Where a technique has been known to improve one device, using the technique to improve a similar device in the same way to yield predictable results would be obvious to a POSITA unless its actual application is beyond their skill. Additionally, where a device part or methodology is publicly known, a mere duplication of said part or methodology would be obvious to a POSITA unless a new and unexpected result is produced. Moreover, a rearrangement of a device's parts to perform the same function without any new or unexpected results is an obvious design choice.

14. Also, any need or problem known in the field at the time of the invention and addressed by the patent can provide a reason for combining elements. An obviousness analysis focuses on what was known or obvious to a POSITA at the time of invention, not to the patentee. Accordingly, any need or problem known in the field of endeavor at the time of invention and addressed by the patent can provide a reason for combining the elements in the manner claimed.

15. Prior art teachings are properly combined when a POSITA is motivated by a general problem addressed by the inventor to combine the knowledge and understanding reflected in multiple prior art references. Additionally, the prior art references themselves, or any need or problem known in the field of endeavor at the

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time of the invention, can suggest the combination of elements to a POSITA in the claimed manner.

16. To demonstrate that a means-plus-function limitation is present in the prior art one must prove that the relevant structure in the prior art performs the identical function recited in the claim and is identical or equivalent to the corresponding structure in the specification of the challenged patent. I understand that a structure is equivalent to corresponding structure for a means-plus-function term if the assertedly equivalent structure performs the claimed function in substantially the same way to achieve substantially the same result as the corresponding structure described in the specification.

17. I understand that in an *inter partes* review, "the petitioner shall have the burden of proving a proposition of unpatentability," including a proposition of obviousness, "by a preponderance of the evidence." 35 U.S.C. § 316(e).

B. Written Description Support

18. I understand that a patent application is entitled to the benefit of the filing date of an earlier filed application only if the disclosure of the earlier application provides support for the claims of the later application, as required by 35 U.S.C. § 112.

19. I also understand that the test for determining compliance with the written description requirement under 35 U.S.C. § 112 is whether the original

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disclosure of the earlier-filed application reasonably would have conveyed to a POSITA that the inventor had possession of the claimed subject matter at the time of the earlier-filed application.

20. Although the exact terms appearing in the claim need not be used *in haec verba* in the specification of an application to provide adequate written description for the claimed subject matter, the specification of the earlier-filed application "must contain an equivalent description of the claimed subject matter.

C. Relevant Time Period for the Obviousness Analysis

21. For purposes of this Declaration, and for Claims 1-9 and 11-21, I am treating the time before February 1, 2017 (the "Critical Date") as the relevant time period for evaluating obviousness.

D. Basis for My Opinion and Materials Considered

22. In forming my opinion, I have reviewed and am familiar with the '808 Patent, its prosecution history, and the exhibits to the Petition; including the following prior art relied on in my opinion:

Ex. 1006	The Ridge Wallet 2.0 by Danial Kane, published on kickstarter.com ("Kane")
Ex. 1007	U.S. Patent Application Pub. No. 2014/0060712 to Daniel Vern Beckley ("Beckley")
Ex. 1008	U.S. Patent No. 2,326,558 to Alfred E. Pelz ("Pelz")

Ex. 1009 U.S. Patent Application Pub. No. 2009/0134223 to Richard Peter Matthews *et al.* ("Matthews")

23. Kane (Ex. 1006), entitled "The Ridge Wallet 2.0," is prior art under 35 U.S.C. § 102(a)(1) (post-AIA), as it was published on www.kickstarter.com at least as early as September 3, 2013, more than 3 years before the Critical Date. A capture of Kane (Ex. 1006) was archived by The Wayback Machine on September 3, 2013, and was retrieved from the following URL on January 23, 2024:

https://web.archive.org/web/20130903204002/http://www.kickstarter.com:80/projects/124039987/the-ridgewallet-20

(Ex. 1022.)

24. Further, Kane (Ex. 1006) is still currently publicly available at the following URL, with a textual description of "Last updated January 27, 2014":

https://www.kickstarter.com/projects/124039987/the-ridge-wallet-20#

25. U.S. Patent Application Pub. No. 2014/0060712 (Ex. 1007) to Beckley, entitled "Wallet," is prior art under 35 U.S.C. § 102(a)(1) (post-AIA), as it was published on March 6, 2014, nearly 3 years before the Critical Date.

26. U.S. Patent No. 2,326,558 (Ex. 1008) to Pelz, entitled "Spring Clip," is prior art under 35 U.S.C. § 102(a)(1) (post-AIA), as it issued on August 10, 1943, nearly 74 years before the Critical Date.

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27. U.S. Patent Application Pub. No. 2009/0134223 (Ex. 1009) to Matthews, entitled "Card Holder-Reader for Wallet Sized Cards," is prior art under 35 U.S.C. § 102(a)(1) (post-AIA), as it was published on May 28, 2009, more than 5 years before the Critical Date.

28. In addition, my opinions, as explained below, are based on my education, experience, and expertise in the fields relating to the '808 Patent. Unless otherwise stated, my testimony below refers to the knowledge of a POSITA as of the Critical Date, or before. Any figures that appear within this document have been prepared to reflect my understanding of the '808 Patent and the prior art discussed below.

III. LEVEL OF ORDINARY SKILL IN THE ART IN THE RELEVANT TIMEFRAME

29. The '808 Patent defines its field of invention as follows:

> This invention relates to billfold wallets, and more particularly to low-profile wallets for credit cards.

(Ex. 1001 at 1:14-15.)

30. The claims of the '808 Patent are directed to compact wallets that hold card-like contents between at least two rigid plates that are elastically biased toward each other, where the wallets have a removable auxiliary feature attached via a tang with hooks that engage undercuts of a recess within at least one of the rigid plates;

and methods of manufacturing thereof. Making and using the invention would require familiarity with mechanical devices, such as wallets.

31. In my opinion, in order to understand the specification of the ’808 Patent, and to make and use the claimed invention without undue experimentation, at the Critical Date; a POSITA would have at least a bachelor's degree in engineering (*e.g.*, mechanical engineering) or a related field. Additionally, a POSITA at the time of the ’808 Patent would have work experience in analyzing, designing, or creating mechanical devices. Further education, or work experience, in the relevant field may compensate for a deficit in the qualifications outlined above. (Ex. 1014 at 8.)

32. I qualify as at least a person of ordinary skill in the art as of the Critical Date, and I have a sufficient level of knowledge, experience, and education to provide an opinion in the field of the ’808 Patent. I am familiar with what a POSITA knew in early 2017 because my lengthy experience with subjects similar to the concepts presented in the ’808 Patent. Additionally, by February 2017, I was familiar with the general subject material in the prior art cited in this Declaration.

IV. TECHNOLOGY BACKGROUND

33. In this section, I discuss the state of the art as of the Critical Date with respect to certain technologies relevant to the subject matter of the ’808 Patent.

34. The background section of the ’808 Patent discusses the state of the art as of 2015 (the filing date of U.S. Patent Application 14/706,019 (the “’019

Application") (Ex. 1005), from which the '808 Patent claims priority) and prior to the Critical Date. For example, the background section of the '808 Patent states that "money clips are common in the art and some money clips also made accommodation for credit cards… Other known devices sandwich cards and/or money between bookend plates bound with elastic strapping. The strapping allows for an expandable interior volume while providing compression to grip the contents." (Ex. 1001 at 1:46-51.)

35. Problems are identified with using known wallet designs in the '808 Patent, as well as in other prior art documents existing prior to the Critical Date, such as an oversizing of the wallet to provide structure for various features. For example, the background section of the '808 Patent purports an "unfilled need for a compact wallet which would be minimally dimensioned to the prototypical credit card profile. Such a compact wallet would be void of any potentially snagging structural appendages while optimizing volume expansion and view-ability of contents." (Ex. 1001 at 2:1-5.)

36. Yet prior art documents prior to the Critical Date disclose compact wallets with silhouettes about the size of a credit card. (Ex. 1006[1] at 5 and 9-15; Ex. 1007 at FIGS. 2A-4B; Ex. 1009 at ¶ [0019], FIGS. 1-5.) Also, compact wallets with

[1] Citations are made to pages, as Kane does not include paragraph, column, or line numbers.

volumetric expansion were well known. (Ex. 1006 at 5; Ex. 1007 at ¶ [0046], and FIGS. 6A-6B.) As were card holders that optimized the view-ability of the card-like contents thereof. (Ex. 1006 at 4-5; Ex. 1009 at FIGS. 1-5.)

37. It was also known prior to the Critical Date that auxiliary features, such as clips, can be attached to card holder wallets to provide additional functionality (*e.g.*, to hold paper tender in addition to card-like contents, and facilitate wearing the card holder on one's person). (Ex. 1006 at 4; Ex. 1007 at ¶¶ [0034], [0038], [0039], and FIG. 2B; Ex. 1009 at ¶¶ [0033], [0041], FIGS. 1-5.) Moreover, providing these auxiliary features in a removably attachable fashion was also well known. (Ex. 1007 at ¶¶ [0038]-[0039] and FIG. 1; Ex. 1008 at 1:41-43, 2:54-3:3, 3:73-4:2, and FIGS. 5-8; Ex. 1009 at ¶¶ [0029], [0033], [0041], Claims 2 and 5-6, Abstract, FIGS. 4-5.)

38. In addition, prior to the Critical Date, hook and undercut engagements were generally known design features for inhibiting mechanical movement between parts. (Ex. 1010.) Further, by at least 2015, a substantial portion of the U.S. population was known to conduct commerce in a predominantly cashless manner (Ex. 1011.)

V. OVERVIEW OF THE '808 PATENT

39. The '808 Patent application was filed on February 1, 2017, and issued on October 6, 2020, claiming a priority date of May 7, 2015. The '808 Patent discloses "a compact wallet designed to present a minimal silhouette in a shirt, pants

or purse pocket." (Ex. 1001, Abstract.) For example, the '808 Patent discloses the following illustration of the compact wallet **1**.

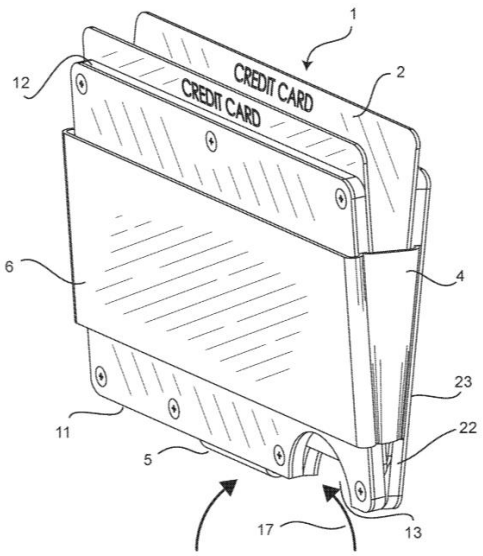


FIG. 10

(*Id*. FIG. 10.)

40. The "compact wallet **1** is comprised of at least two rigid plates **10**, serving as 'book-ends' as it were, with one or more card-like contents **2** sandwiched between them." (*Id.* at 3:58-61.) Each of the rigid plates **10** is a laminate construction comprising a first lamina **22** "capped with a second lamina **23** to capture one portion of the encircling elastic band **4**." (*Id*. at 4:22-24.)

41. The encircling elastic band **4** is held in place by a channeling means **20** inside each of the rigid plates **10**. (*Id*. at 4:14-15.) "The encircling elastic band **4** holds the card-like contents **2** securely be means of compression," by biasing the

rigid plates **10** toward each other "while also expanding elastically to open space between the rigid plates **10**." (*Id*. at 3:62-65.)

42. The channeling means **20** is located internal to the rigid plates **10** and "prevents the encircling elastic band **4** from adding more than negligible breadth to" the profile of the compact wallet **1**. (*Id*. at 4:2-5.) The "channeling means **20** of the preferred embodiment is a longitudinal groove **21** spanning a longitudinal extent **3** of each rigid plate **10**." (*Id*. at 4:9-11.) The longitudinal groove **21** receives the encircling elastic band **4** and holds the encircling elastic band's **4** position there within while the encircling elastic band **4** expands/contracts with the opening/closing of the compact wallet **1**. (*Id*. at 4:13-19.)

43. For example, the '808 Patent discloses the following exploded perspective of the compact wallet **1**.

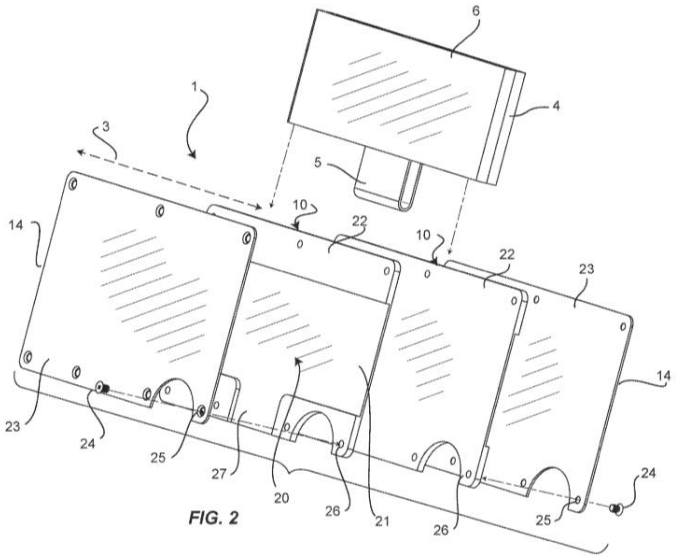


FIG. 2

(*Id*., FIG. 2.)

44. Each of the rigid plates **10** further include a transverse groove **27** that receives a first elastic strap **5**. (*Id*. at 4:63-66.) The first elastic strap **5** prevents the card-like contents **2** from slipping beyond the ends of the rigid plates **10** when expansion takes place, and the first elastic strap **5** is attached to the encircling elastic band **4**. (*Id*. at 4:61-65.)

45. The compact wallet **1** may further comprise a second elastic strap **6**, "positioned over the outside surface of one of the rigid plates **10** to strap thereon currency **8** (FIG. 1), or additional card-like contents 2. Preferably, the second elastic strap **6** is attached to the encircling elastic band **4** by sewing, or bonding…." (*Id*. at 5:2-3-6.)

46. For example, FIGS. 7-9 of the '808 Patent illustrate the structural features of the rigid plates **10** (including the first lamina **22** and second lamina **23**), the channeling means **20** (including the longitudinal groove **21**), and the transverse groove **27**; along with the first elastic strap **5** and second elastic strap **6** attached to the encircling elastic band **4**.

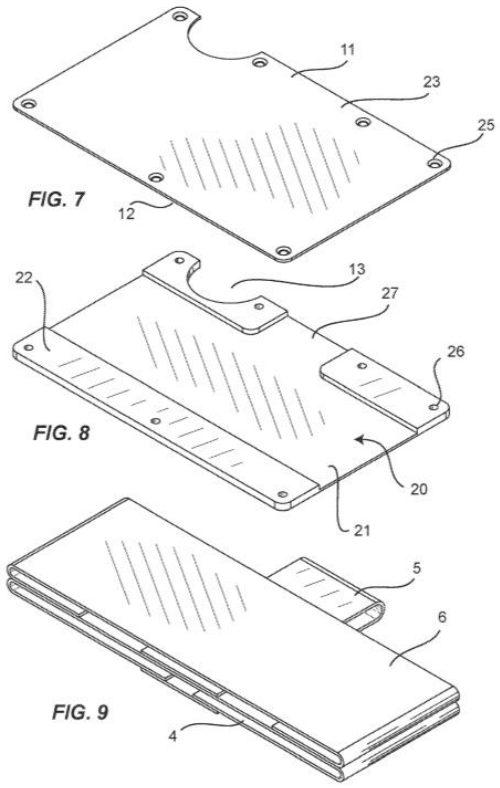


FIG. 7

FIG. 8

FIG. 9

(*Id*., FIGS. 7-9.)

47. Additionally, the compact wallet **1** may comprise an auxiliary feature **30** preferably embodied as a money clip **31**. (*Id*. at 5:13.) The '808 Patent explains that:

> The auxiliary feature **30** is removably attached to at least one of the rigid plates **10** by means of a tang **33** inserted into a recess **34** in the groove **21** outboard of the elastic band **4**. The outboard positioning prevents interference with the free operation of the elastic band. In a particularity, the recess **34** has an undercut **35** and a tang **33** has a hook **36** (FIG. **12**). The hook **36** engages the

undercut **35** to prevent inadvertent dislodgement of the auxiliary feature **30** when attached to the compact wallet **1**.

(*Id*. at 5:23-31.)

48. Provided below is FIG. 12 of the ’808 Patent, which illustrates the hook **36** and tang **33** of the money clip **31**, and a magnified portion of the ’808 Patent’s FIG. 13, which illustrates the recess **34** and undercut **35** formed inside the first lamina **22** of the rigid plate **10**.

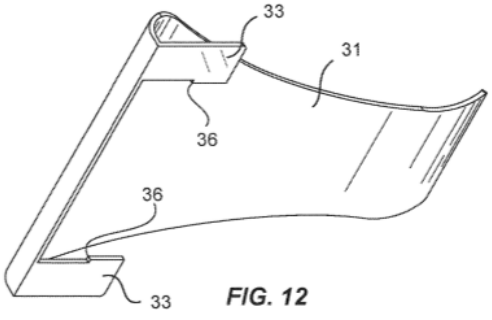
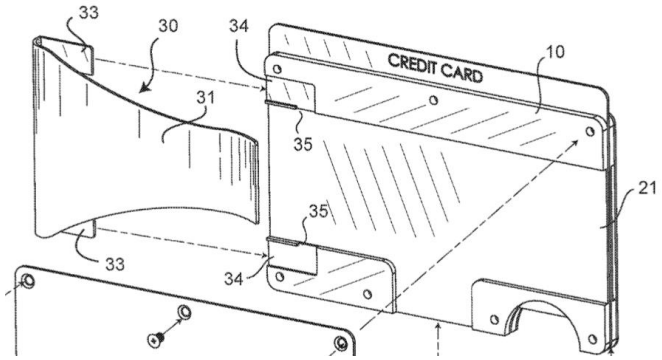


FIG. 12



(*Id*., FIGS. 12-13.)

A. Critical Date Determination

49. I am aware that a dispute exists as to whether Claims 1-9 and 11-21 of the ’808 Patent are entitled to claim priority to earlier-filed ’019 Application (Ex. 1005), filed May 7, 2015, and International Application PCT/US16/031472 (the

"'472 Application) (Ex. 1012), filed May 9, 2016 (collectively, the "Earlier-Filed Applications").

50. In my opinion, as explained below, Claims 1-9 and 11-21 of the '808 Patent are not entitled to claim priority to the 2015 date of the '019 Application, nor the 2016 date of the '472 Application.

51. The '808 Patent issued from U.S. Patent Application 15/421,596 (the "'596 Application"), filed February 1, 2017. (Ex. 1001, cover.) The '596 Application was identified as a continuation-in-part of the '019 Application. (*Id*.)

52. Therefore, for any claims of the '808 Patent for which written description support appears in the prior applications, the '808 Patent is considered to have been filed as of the filing date of those prior applications. Further, the filing date of those prior applications would be a dispositive date for the purpose of determining, as to those claims, whether a reference would qualify as prior art.

53. I also understand that, for any claims of the '808 Patent for which written description support does not appear in a prior application to which priority is properly claimed, the actual filing date of the '596 Application is to be considered for the purpose of determining, as to those claims, whether a reference would constitute prior art.

54. Thus, depending on the adequacy of written description support for any particular claim, the effective filing date for that particular claim may be as early as

May 7, 2015, or as late as February 1, 2017, the actual filing date of the '596 Application that issued as the '808 Patent.

55. I understand that Claims 1-9 and 11-21 of the '808 Patent are being challenged in this *inter partes* review, with Claims 1, 14, and 19 being the challenged independent claims. I have reviewed these claims, the '596 Application, the '019 Application, and the '472 Application.

56. In view of the limitations recited in independent claims 1, 14, and 19 of the '808 Patent, it is my opinion that these independent claims recite subject matter that is not disclosed (expressly or inherently) by the Earlier-Filed Applications. It is further my opinion, that the subject matter recited by independent claims 1, 14, and 19 does not necessarily follow from what is expressly or inherently disclosed in the Earlier-Filed Applications. Further, the subject matter of claims 1, 14, and 19 is incorporated into dependent claims 2-13, 15-18, and 20-21. Thus, the disclosure of the Earlier-Filed Applications would not have conveyed to a POSITA that the inventor had possession of the claimed subject matter at the time those Earlier-Filed Applications were filed.

57. For example, Claim 1 recites, in relevant part,

> an auxiliary feature removably attached to at least one of the 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

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> 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. 1001 at 6:55-61.) However, description of a "tang," "recess," "hook," and "undercut" was introduced for the first time in specification of the '596 Application filed on February 1, 2017. Additionally, these limitations were claimed for the first time in claim amendments filed on May 27, 2020, during prosecution of the '596 Application. (Ex. 1004 at 146-150.)

58. I have reviewed the Earlier-Filed Applications, and have found no description of an embodiment, or any disclosure at all, describing a tang insertable into a recess inside the rigid plates and having a hook that extends at an angle. Nor have I found any disclosure in the Earlier-Filed Applications of a hook that engages an undercut of the recess to perform any function. Thus, the Earlier-Filed Applications, to which the '808 Patent claims priority, do not provide support for these limitations.

59. Further, I do not believe that these limitation of Claim 1 of the '808 Patent necessarily follow from what is actually described in the Earlier-Filed Applications. For example, the Earlier-Filed Applications do not include FIGS. 11-13 of the '808 Patent. Further, the Earlier-Filed Applications do not include the description, in reference to FIGS. 11-13, of "an auxiliary feature **30**," "a tang **33**,"

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"a recess **34**," "a hook **36**," or "an undercut **35**" provided in column 5, lines 10-31 of the '808 Patent. Moreover, the Earlier-Filed Applications do not include the description of a "method for making a modular compact wallet" provided in column 6, lines 9-23 of the '808 Patent. Rather these disclosures were first introduced in the specification of the '596 Application filed on February 1, 2017.

60. Likewise, Claim 14 recites, in relevant part:

> 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…."

(*Id*. at 7:56-63.) These limitations are substantively the same as the corresponding limitations of Claim 1 and do not have support in the Earlier-Filed Applications for the same reasons as those discussed above regarding Claim 1.

61. Similarly, Claim 19 recites, in relevant part:

> providing a first auxiliary feature having at least one tang; inserting, removably, the at least one tang of the first auxiliary feature into the at least one recess to make the first auxiliary feature available at an outside face of at least

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

(Id. at 8:29-52.) These limitations are substantively the same as the corresponding limitations of Claims 1 and 14 and do not have support in the Earlier-Filed Applications for the same reasons as those discussed above.

VI. PROSECUTION OF THE ’808 PATENT

62. I have reviewed the prosecution history of the ’808 Patent.

63. The Examiner issued only a single Office Action during the prosecution of the ’808 Patent. (Ex. 1004 at 64-72.)

64. In that Office Action, the Examiner rejected all claims, *i.e.*, Claims 1-24, under multiple grounds pursuant to 35 U.S.C. § 102(a)(1) as being anticipated by various references. (*Id.* at 67-70.) Additionally, the Examiner rejected, via

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multiple grounds, Claims 1-2, 6-7, 10-11, and 13-18 under 35 U.S.C. § 103 as being obvious in view of various references. (*Id*. at 66-67, and 69-70.)

65. Amongst the numerous rejections, the Examiner rejected Claims 1-18 under 35 U.S.C. § 102(a)(1) as being anticipated by Kane (Kickstarter, the Ridge Wallet 2.0). (*Id*. at 70.) Further, the Examiner rejected Claims 19-21 under 35 U.S.C. § 102(a)(1) as being anticipated by Kane (Kickstarter, the Ridge Wallet 2.0) in view of Chapin (US 5,038,985). (*Id*.)

66. Following the Office Action, the Applicant failed to submit a reply within the six month statutory deadline, and the '596 Application was deemed abandoned. (*Id*. at 118-119.) A year after the Notice of Abandonment, Applicant revived the '596 Application and amended independent Claims 1, 14, and 19. (*Id*. at 121-150.)

67. The Examiner issued a Notice Of Allowance on August 31, 2020, and noted that the referenced prior art allegedly lacks "the limitation of the recess having an undercut operable to engage a hook of the tang." (*Id*. at 152-158.)

68. The '808 Patent issued on October 6, 2020. (Ex. 1001, cover.)

VII. CLAIM CONSTRUCTION

69. I understand that in an *inter partes* review claims are to be construed using the same claim construction standard that would be used to construe the claim in a federal civil action. Generally, claims are construed in accordance with the

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ordinary and customary meaning they would have to a POSITA at the time of invention. Further, said "ordinary and customary meaning" is to be understood in light of the specification and prosecution history. I understand that dictionaries and other extrinsic evidence may be considered as well, though such evidence is typically regarded as less significant than the intrinsic record in determining the meaning of the claim language.

70. I understand that when a claim limitation recites a generic term (*e.g.*, "means") with associated functional language, the recitation may invoke a means-plus-function interpretation under 35 U.S.C. § 112(f) (post-AIA). I also understand that when a claim limitation recites the term "means" along with functional language, a presumption arises that a means-plus-function interpretation is applied. I further understand that a means-plus-function interpretation is not appropriate where the claim language recites sufficient structural element for performing the functional language.

71. I understand that when claim language invokes a means-plus-function treatment, the specification must describe corresponding structural features such that a POSITA will understand the structure that performs the recited function. I also understand that the scope of claimed terms under a means-plus-function interpretation will be construed to cover the corresponding structure and equivalents of it. As such, construction of means-plus-function terms requires identification of

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function as well as corresponding structure for said function. I understand that a reference must provide equivalent structure for performing an equivalent function to anticipate, or render obvious, a claim term construed under a means-plus-function interpretation.

72. In the ’808 Patent, except as discussed below, the terms can be given their ordinary meaning, or in any event, the ordinary meaning they would have to a POSITA in the field of wallets.

A. “Channeling Means”

73. I understand that the term “channeling means,” as used in Claim 1, has been construed under a means-plus-function interpretation in multiple prior claim construction determinations related to the ’808 Patent. (Ex. 1013; Ex. 1014.) Table 1 articulates the prior construction determinations of “channeling means,” as recited in Claim 1.

Table 1

Mosaic Brands Inc., v. The Ridge Wallet LLC, Case No. 2:20-cv-04556 (C.D. Cal. 2020)	*Certain Compact Wallets and Components Thereof*, ITC Inv. No. 337-TA-1355.

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<u>Function</u>: To minimize the profile of the wallet and hold position of the at least one encircling 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.	**<u>Function</u>:** To minimize the profile of the wallet and hold position of the at least one encircling 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.
<u>Structure</u>: A groove spanning the extent of one or more of the rigid plates or a longitudinal bore through each rigid plate.	**<u>Structure</u>:** 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.

(Ex. 1013 at 17-18; Ex. 1014 at 8-9.)

74. In my opinion, the two construction determinations are nearly identical; however, the construction determination of *Certain Compact Wallets and Components Thereof* is slightly broader. In particular, if a reference is found to disclose the claimed "channeling means" under the construction determination of *Mosaic Brands Inc.,* said reference would inherently disclose the claimed

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"channeling means" under the *Certain Compact Wallets and Components* construction determination.

75. Further, the construction of determination of *Mosaic Brands Inc*. matches the description provided by the '808 Patent, which states:

> A channeling means **20** prevents the encircling elastic band **4** from adding more than negligible breadth to the profile **14**. This profile minimization is accomplished by locating the channeling means **20** internally to the rigid plates **10**… the channeling means **20** of the preferred embodiment is a longitudinal groove **21** spanning a longitudinal extent **3** of each rigid plate **10**. The longitudinal groove **21** is of such ample dimension as to receive a corresponding part of the encircling elastic band **4** and allow it to slidingly expand and contract freely while holding position there within. In this way, the full running length of the band can be exercised for expansion while contraction is rendered responsive… the channeling means **20** might be a longitudinal bore through each rigid plate **10**.

(Ex. 1001 4:2-5, 4:9-17, 6:32-34, and FIGS. 2, 8, 13.)

76. As such, I have applied the means-plus-function determination applied by the court in *Mosaic Brands Inc.,* to the "channeling means" recited in Claim 1.

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77. It is my opinion that, applying either interpretation, Challenged Claims 1-13 and 18, which include this term, either expressly or by dependency, are obvious and unpatentable over the prior art.

B. "Recess"

78. I understand that the term "recess," as used in the Challenged Claims, has not been construed under a prior claim construction determination related to the '808 Patent. For example, the term "recess," as used in the Challenged Claims, was not a disputed term in neither *Mosaic Brands Inc*., nor *Certain Compact Wallets and Components Thereof*. (Ex. 1013; Ex. 1014.)

79. I understand that Petitioner has posited in *The Ridge Wallet LLC, v. 2985 LLC d/b/a Mountain Voyage Co*. that the term "recess," as used in the Challenged Claims, should be construed as "a groove with a sidewall that is adjacent to the longitudinally extending groove (*i.e.*, the "channeling means")." (Ex. 1015 at 11-13.)

80. In my opinion, a POSITA as of the Critical Date would have interpreted the term "recess," as used in the Challenged Claims in accordance with Petitioner's construction in light of the intrinsic record of the '808 Patent. For example, the specification of the '808 Patent describes a sole embodiment that includes a recess **34** distinct from the channeling means **20**/longitudinal groove **21**. (Ex. 1001 at 5:23-28, and FIG. 13.) In said embodiment, the recess **34** is a groove having a sidewall

that is adjacent to the channeling means **20**/longitudinal groove **21**. (*See Id*., FIG. 13.)

81. As such, I have applied the Petitioner's construction to the term "recess" recited in the Challenged Claims.

82. In the alternative, I have also applied an ordinary and customary meaning to the term "recess," in which a "recess" is a surface groove or depression.[2] In my opinion, a POSITA at the Critical Date would have construed "recess," as used in the Challenged Claims, to mean a surface groove in accordance with the intrinsic record and further in view of the extrinsic record.

83. It is my opinion that, applying either construction, Challenged Claims 1-9 and 11-21, which include this term, either expressly or by dependency, are obvious and unpatentable over the prior art.

C. "Hook"

84. I understand that the term "hook," as used in the Challenged Claims, has been construed in a prior claim construction determination related to the '808 Patent. (Ex. 1013 at 19.) In *Mosaic Brands Inc.,* the parties disputed the meaning of "hook," and the court construed "hook" in accordance with its plain and ordinary meaning. (*Id.*) In *Certain Compact Wallets and Components Thereof*, the parties

[2] Ex. 1016 at 1: "recess (ENG] A surface groove or depression."

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agreed to a plain and ordinary meaning construction of the claimed term "hook." (Ex. 1014 at 9.)

85. I understand that Petitioner has posited in *The Ridge Wallet LLC, v, 2985 LLC d/b/a Mountain Voyage Co*. that the term "hook," as used in the Challenged Claims, should be construed as "a device that abruptly changes direction from a trunk section to define a ledge for catching or holding." (Ex. 1015 at 14-15.)

86. In my opinion, a POSITA as of the Critical Date would have interpreted the term "hook," as used in the Challenged Claims, in accordance with Petitioner's construction in light of the intrinsic record of the '808 Patent. For example, the specification of the '808 Patent describes a sole embodiment that includes a recess **36**. (Ex. 1001 at 5:27-31, and FIG. 12.) In said embodiment, the hook **36** is a device that abruptly changes direction from the tang **33** to define a ledge that catches the undercut **35** while the tang **33** is positioned inside the recess **34**. (*See Id*., FIGS. 12-13.)

87. As such, I have applied the Petitioner's construction to the term "hook" recited in the Challenged Claims.

88. In the alternative, I have also applied an ordinary and customary meaning to the term "hook," in which a "hook" is a curved or bent device for

catching or holding.[3] In my opinion, a POSITA at the Critical Date would have construed "hook," as used in the Challenged Claims, to mean a curved or bent device for catching or holding in accordance with the intrinsic record and further in view of the extrinsic record.

89. It is my opinion that, applying either construction, Challenged Claims 1-9 and 11-21, which include this term, either expressly or by dependency, are obvious and unpatentable over the prior art.

D. "Undercut"

90. I understand that the term "undercut," as used in the Challenged Claims, has been construed in a prior claim construction determination related to the '808 Patent. (Ex. 1013 at 18-19.) In *Mosaic Brands Inc.,* the parties disputed the meaning of the term "undercut," and the court construed "undercut" in accordance with its plain and ordinary meaning. (*Id.*) In *Certain Compact Wallets and Components Thereof*, the parties agreed to a plain and ordinary meaning construction of the claimed term "undercut." (Ex. 1014 at 9.)

91. I understand that Petitioner has posited in *The Ridge Wallet LLC, v, 2985 LLC d/b/a Mountain Voyage Co*. that the term "undercut," as used in the

[3] Ex. 1017 at 1: "[1]**hook** \'huk\n **1**: a curved or bent device for catching, holding, or pulling"

Challenged Claims, should be construed as "a cut away portion of the sidewall of the recess." (Ex. 1015 at 16-18.)

92. In my opinion, a POSITA as of the Critical Date would have interpreted the term "undercut," as used in the Challenged Claims, in accordance with Petitioner's construction in light of the intrinsic record of the '808 Patent. For example, the specification of the '808 Patent describes a sole embodiment that includes an undercut **35**. (Ex. 1001 at 5:27-31, and FIG. 13.) The textual description provided by the '808 Patent is void of any structural context as to, for example, the undercut's dimensions, profile, or orientation. Rather, the only structural and/or positioning features attributed to the undercut **35** are derived from FIG. 13; which depicts the undercut **35** as a cut away portion of the sidewall of the recess **34**. (*See Id*., FIGS. 12-13.)

93. As such, I have applied the Petitioner's construction to the term "undercut" recited in the Challenged Claims.

94. In the alternative, I have also applied an ordinary and customary meaning to the term "undercut," in which a "undercut" is an underside recess that is either cut or molded into an object to at least partially define a lip or protuberance.[4] In my opinion, a POSITA at the Critical Date would have construed "undercut," as

[4] Ex. 1016 at 2: "**undercut** [ENG] Underside recess either cut or molded into an object so as to leave a topside lip or protuberance."

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used in the Challenged Claims, to mean an underside recess that is either cut or molded into an object to at least partially define a lip or protuberance in accordance with the intrinsic record and further in view of the extrinsic record.

95. It is my opinion that, applying either construction, Challenged Claims 1-9 and 11-21, which include this term, either expressly or by dependency, are obvious and unpatentable over the prior art.

VIII. OVERVIEW OF PRIOR ART REFERENCES

A. The Ridge Wallet 2.0 by Daniel Kane ("Kane")

96. Kane (Ex. 1006) is titled "The Ridge Wallet 2.0" and was published by Daniel Kane on Kickstarter.com by at least September 3, 2013, as evidenced by the website capture archived by The Wayback Machine.

97. Kane was published by the inventor of the '808 Patent and discloses a compact wallet for holding card-like contents. (Ex. 1006 at 2: "The Ridge 2.0 can accommodate various number of cards without losing elasticity; providing an extremely thin wallet that isn't limited in it's capacity," 3: "low profile to easily fit in your front pocket," and 4-5: photographs thereof.)



(*Id*. at 5.)

98. The compact wallet secures the card-like contents between two interior plates formed from "anodized aircraft grade aluminum." (*Id*. 4: photographs thereof, and 5: "interior plates machined from anodized aircraft grade aluminum.") Each interior plate includes an integrated elastic track that receives an encircling elastic band. (*Id*. at 5: "The track runs along two hollow interior plate," and photograph thereof) The integrated elastic track is depicted as a groove extending along the longitudinal extent of each interior plate. (*Id*.) The integrated elastic track functions to hold the position of the encircling elastic band in a manner that minimizes the profile of the compact wallet. (*Id*. at 5 and 7: photographs thereof.)



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(*Id*. at 5.)

99. Kane further discloses outer faceplates secured to each of the interior plates. (*Id*. at 4: "interchangeable faceplates," and 9-15: photographs thereof.) For example, the outer faceplates can be fastened to the interior plates by screws or rivets. (*Id*. at 7: "Seven hex screws machined from scratch secure the inner and outer plates…," and 3, 4-15: photographs thereof.) When secured to an interior plate, the outer faceplate covers the integrated elastic track and the encircling elastic band positioned therein. (*Id*. at 3, 4-15: photographs thereof.) The outer faceplates can be composed of a variety of rigid materials, including: aluminum, titanium, or carbon fiber. (*Id.* at 6: "You can then choose between Titanium, Aluminum, or Carbon Fiber for the outer faceplates," and 3, 4-15: photographs thereof.)

100. The encircling elastic band biases the interior plates, and the outer faceplates secured thereto, towards each other and provides elastic volume therebetween. (*Id*. at 5: "The Integrated Elastic Track can expand to hold up to 12 cards and then immediately contract to hold a single card securely," and photographs thereof.) As cards are added to the compact wallet, the encircling elastic band expands to provide additional volumetric capacity. (*Id*.) As cards are removed from the compact wallet, the encircling elastic band contracts to alter the volume of the wallet. (*Id*.)

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(*Id*. at 5.)

101. Kane also discloses another groove in the interior plates positioned transverse to the integrated elastic track. (*Id*.) Further, Kane depicts an elastic strap located within the transverse groove. (*Id*. at 4-5 and 7: photographs thereof.) As card-like contents are inserted into the wallet, they appear to abut the elastic strap. (*Id*. at 3: "singular construction that won't let cards slip out the bottom," and 4-5: photographs thereof.)

102. Moreover, Kane discloses multiple money clip options, including: a "traditional money" clip, and/or a "spring-loaded" money clip. (*Id*. at 4: "Improved traditional money clip design, Designed additional money clip with an internal spring (spring-loaded)," and 4-7, and 10-15: photographs thereof.) Kane depicts the money clips as attached to the outer faceplates and/or interior plates, while functioning to secure paper currency to an outer face of the wallet. (*Id*. at 4: photographs thereof.)



(*Id*. at 6.)

103. To secure cards inside the wallet, Kane discloses sliding the cards between the interior plates, at their tapered ends. (*Id*. at 3: "The interior plates have been tapered at the edge to allow easier access to the middle cards," and 8: "The top of the inner plates are tapered to let you easily slide additional cards into the wallet."). To remove cards from the wallet, an edge of the cards can be pushed via a thumb indentation of the interior plates and outer faceplates. By pushing up on the cards exposed in the thumb indentation, an opposite end of the cards rises above the plates; thereby, enabling the user to select individual cards from the wallet. (*Id*. at 8: "The Thumb indentation at the lower left of the wallet allows you to easily push your cards up and select the correct one.") While the cards reside inside the wallet, the plates provide RFID protection. (*Id*.: "The Ridge's aluminum interior plates block RFID, keeping your information safe.")

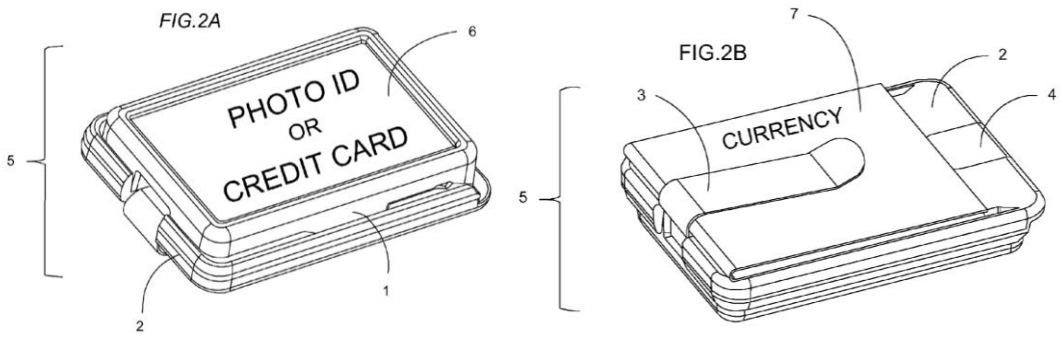
104. Moreover, Kane describes various modular features of the compact wallet to promote personalization, minimalist preferences, and/or maintenance/repair operations. (*Id*. at 3: seven hex screws on either side that turn the

wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange outer plates for greater personalization," 4: "interchangeable faceplates… greater selection of anodization," 5: "should the elastic ever wear out, you can easily replace it," 7: "replaceable elastic and interchangeable faceplates," and 9-15: photographs thereof.)

B. U.S. Patent Publication No. 2014/0060712 to Beckley ("Beckley")

105. Beckley (Ex. 1007) is titled "Wallet" and lists Daniel Ver Beckley as the sole inventor. Beckley was filed August 29, 2013, and published March 6, 2014. It claims priority to Provisional Application No. 61/694,359, filed on August 29, 2012. (Ex. 1007, cover.)

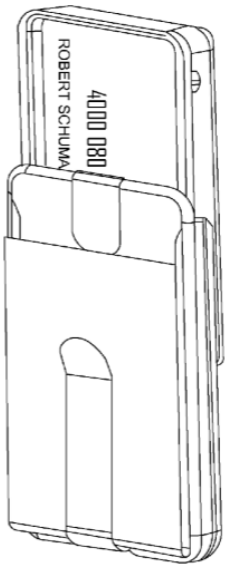
106. Beckley addresses problems associated with bulky wallets of limited carrying capacity, and discloses a compact wallet for holding "a plurality of articles such as credit cards, currency, identification cards, and licenses." (*Id*. at ¶¶ [0004]-[0008], and FIGS. 4B, 5A-5B, 6A-6B.) The wallet is composed of a container portion **1**, a base portion **2**, a clip **3**, and a retention spring **4**. (*Id*. at ¶ [0004], and FIGS. 1, 2A-2B, 4A-4B, 5A-5B, 6A-6B, 7A, 7D, 8A.) The container portion **1** and base portion **2** are slidingly connectable via a set of rail features **8**. (*Id*. at ¶ [0037], and FIG. 1, 3A, 4B 7D.)



(*Id*. FIGS. 2A-2B.)

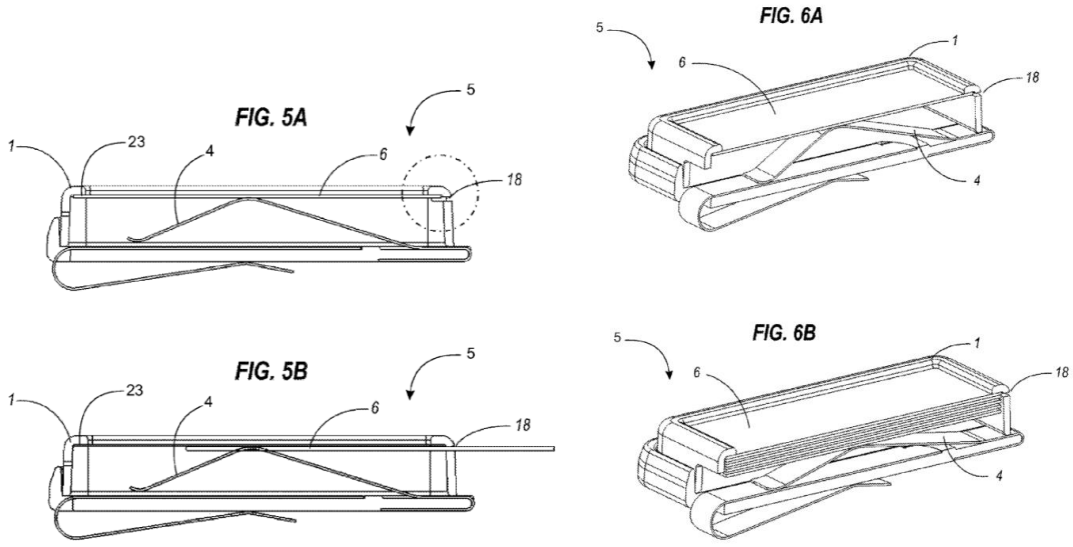
107. To load the wallet **5** with cards **6**, the container portion 1 can slide away from the base portion 2, whereupon cards 6 can be inserted between the container portion 1 and base portion 2. (*Id*. at ¶ [0043], FIG. 4B.)

FIG.4B



(*Id*. at FIG. 4B.)

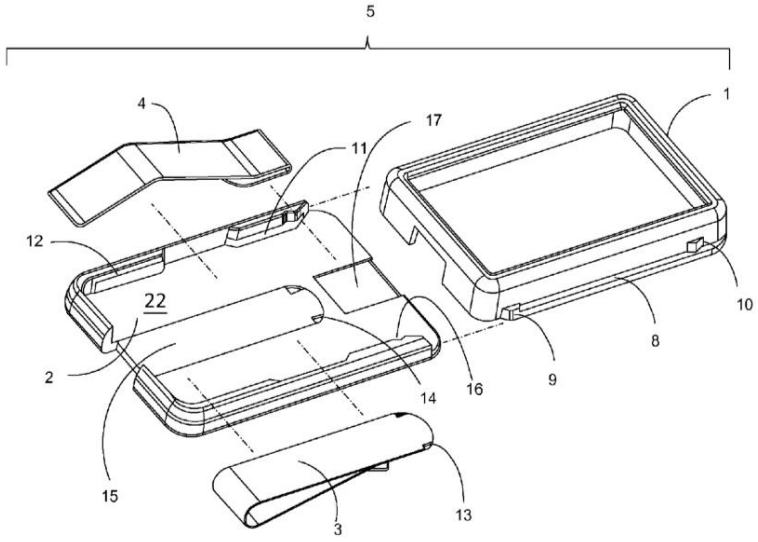
108. While stowed, the cards **6** are sandwiched between the container portion **1** and the base portion **2** by the retention spring **4**. (*Id*. at ¶ [0044]: "The card **6** is secured within the wallet **5** by the retention spring **4** using a spring force against a planar surface of the card **6** to a surface **23** of the container portion **1**," ¶¶ [0045]-[0046], and FIGS. 1, 5A-5B, 6A-6B.) Thereby, the retention spring **4** is interposed between the container portion **1** and base portion **2** to provide adjustable volume therebetween. (*Id*. at ¶ [0046]: "FIG. 6A shows the position of the retention spring **4** when used with one card **6**… FIG. 6B shows the position of the retention spring **4** when used with a plurality of cards **6**," and FIGS. 6A-6B.) Further, the card(s) **6** can be retrieved from the wallet **5**, while in a closed position, by directing the card(s) **6** through an opening **18** located on a side of the container portion **1**. (*Id*. at ¶ [0044].)



(*Id*., FIGS. 5A-5B and 6A-6B.)

109. Beckley discloses that the wallet's **5** clip **3** can be used to secure currency to the wallet **5**, or to secure the wallet **5** to a garment. (*Id*. at ¶ [0034], and FIG. 2B.) Further, Beckley discloses that the clip **3** is attached via an engagement between one or more barbs **13** on the clip **3** with one or more cavities **14** in a depression **15** of the base portion **2**. (*Id*. at ¶ [0038]-[0039], and FIG. 1.) For example, the clip **3** slides into the depression **15**, whereupon the barbs **13** are seated into the cavities **14**. (*Id*.) As such, the clip **3** is made available to an outside of the wallet **5**. (*Id*. at FIGS. 2B, 4A-4B, 5A-5B, 6A-6B, and 7D.)

FIG.1



(*Id*., FIG. 1.)

C. U.S. Patent No. 2,326,558 to Pelz ("Pelz")

110. Pelz (Ex. 1008) is titled "Spring Clip" and lists Alfred E. Pelz as the sole inventor. Pelz was filed March 9, 1943, and patented August 10, 1943. (Ex. 1008, cover.)

111. Pelz addresses problems associated with clips attached to compact devices worn on one's person (*e.g.*, hearing aid microphone). (Ex. 1008 at 1:5-19.) For example, Pelz describes traditional clips of compact devices as being too bulky, unwanted in some circumstances, and/or having complicated attachment means. (*Id*.)

112. Pelz discloses "a clip that lies close to the case, which has little tendency to catch on the clothing… and which is readily detachable from the case. (*Id*. at 1:22-27.) Pelz discloses a clip **2** that is removably attached to the outside of a case **1**. (*Id*. at 2:1, 2:54, FIGS. 1-2 and 8.)

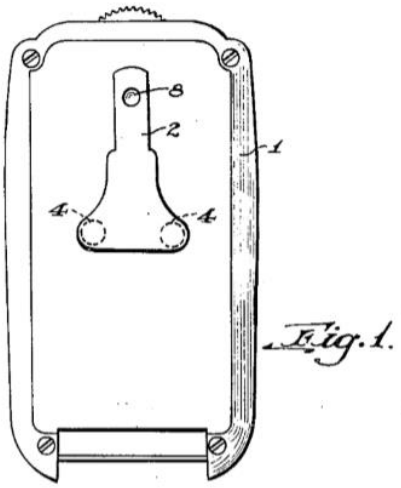


Fig. 1.

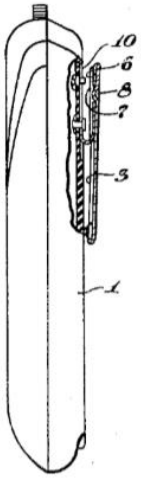


Fig. 2.

(*Id*. FIGS. 1-2.)

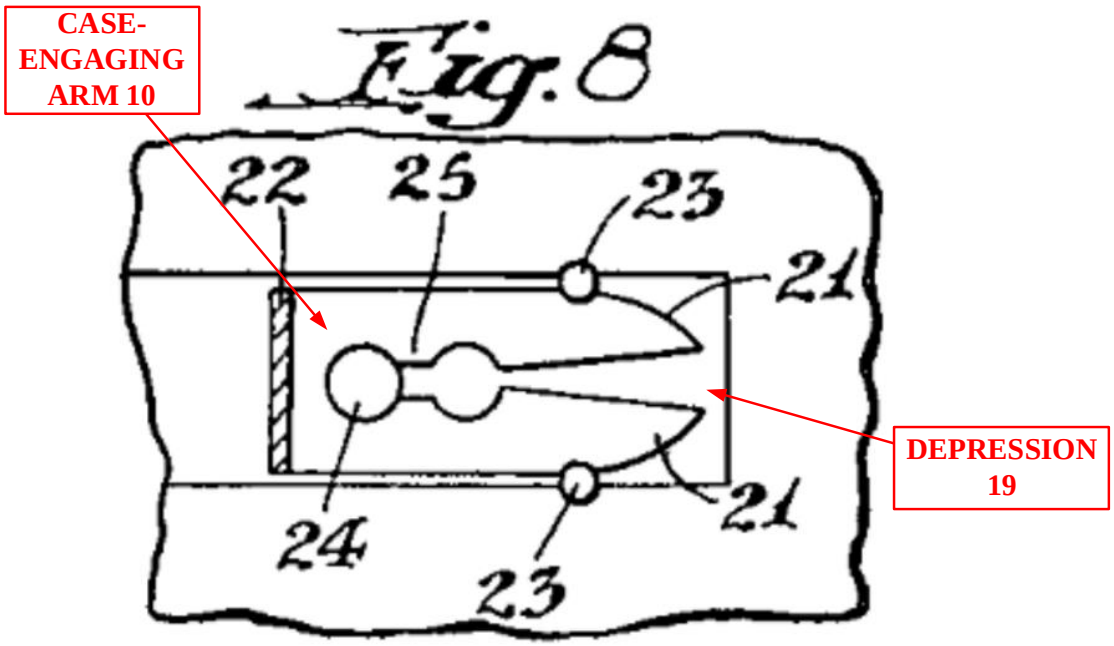
113. The clip **2** has a case-engaging arm **10** that is insertable into a depression **19** in the case **1**. (*Id*. at 3:60-66, FIG. 8.) Further, Pelz discloses a stud **12/24** extending from the case **1**, from within the depression **19**, that overlie the case-engaging arm **10** to hold the clip **2** against the case **1**. (Ex. 1:35-37, 3:13-16, FIG. 8.) The case-engaging arm **10** is further bifurcated into two laterally resilient fingers **21** that restrain the clip **2** from vertical movement on the case **1**. (*Id*. at 1:58-54, 3:73-4:15, FIG. 8.)

114. The case-engaging arm **10** has "a keyhole-shaped slot **11/25** having its enlarged circular opening at its upper end." (*Id*. at 3:1-3, FIG. 8.) The enlarged opening of the slot **11/25** is configured to receive the head of the stud **12/24** that extends from the case **1** within the depression **19**. (*Id*. at 3:3-5, FIG. 8.) The cylindrical body of the stud **12/24** is provided with slots **13** to narrow its width; thereby enabling a narrow end of the slot **11/25** to receive the body of the stud **12/24**. (*Id*. 3:8-13).

115. To attach the clip **2**, the case-engaging arm **10** is positioned in the depression **19** such that the enlarged opening receives the head of the stud **12/24**. (*Id*. 3:3-5.) The case engaging arm **19** is then slid inside the depression **19** to translate the body of the stud **12/24** into the narrow end of the slot **11/25**. (*Id*. at 3:10-13.)

Thereby, the head of the stud **12/24** overlies the sides of the slot **11/25** and holds the case-engaging arm **10** against the case **1**. (*Id*. at 3:13-15, FIG. 8.)

116. Sliding the stud **12/24** to the narrow end of the slot **11/25** also results in the fingers **21** engaging one or more pins **23**, which may be integral projections of the case **1**. (*Id*. at 3:73-4:2, FIG. 8.) For example, while the stud **12/24** is positioned at the end of the slot **11/25**, the pins **23** are positioned within side recesses of the fingers **21** of the case-engaging arm **10**. (*Id*. at 1:48-52, 3:72-4:15, FIG. 8.) The engagement between the fingers **21** and pins **23** prevents the case-engaging arm **10** from inadvertently traveling back up the length of the depression **19**.



(*Id.* FIG. 8 (*annotated*).)

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117. To remove the clip **2**, a sufficient amount of manual pressure is applied to the clip **2** so as to dislodge the pins **23** from the side recesses of the fingers **21**; thereby permitting the stud **12/24** to translate to the enlarged opening of the slot **11/25**, where the stud head no longer inhibits displacement of the case-engaging arm **10** from the depression **19**. (*Id*. at 1:41-43, 3:53-60, 4:13-15.)

D. U.S. Patent Publication No. 2009/0134223 to Matthews *et al.* ("Matthews")

118. Matthews (Ex. 1009) is titled "Card Holder-Reader for Wallet-Sized Cards" and lists Richard Matthews as the lead inventor. Matthews was filed November 11, 2008, and published May 28, 2009. It claims priority to Provisional Application No. 60/988,423, filed on November 15, 2007. (Ex. 1009, cover.)

119. Matthews discloses a card holder comprising a front piece **2** and a back piece **3** that are joined together to hold wallet-sized cards (*e.g.*, credit cards) therebetween. (Ex. 1009 at ¶ [0029], FIGS. 1-5.) Further, Matthews discloses a clip **6** removably attached to the back piece **3** by inserting a tang of the clip **6** into a recess formed in the back piece **3**; whereupon "a hole on the clip **23** is pushed up over a protrusion **24** in the back piece for retention." (Ex. 1009 at ¶¶ [0029], [0033], [0041]: "the clip is removable, as it is retained by a small post on the back case part and a corresponding hole in the clip. This combination provides sufficient retention force

to retain the clip against common loads during normal use… This design allows for secure retention of the clip but also for user assisted removal if desired."

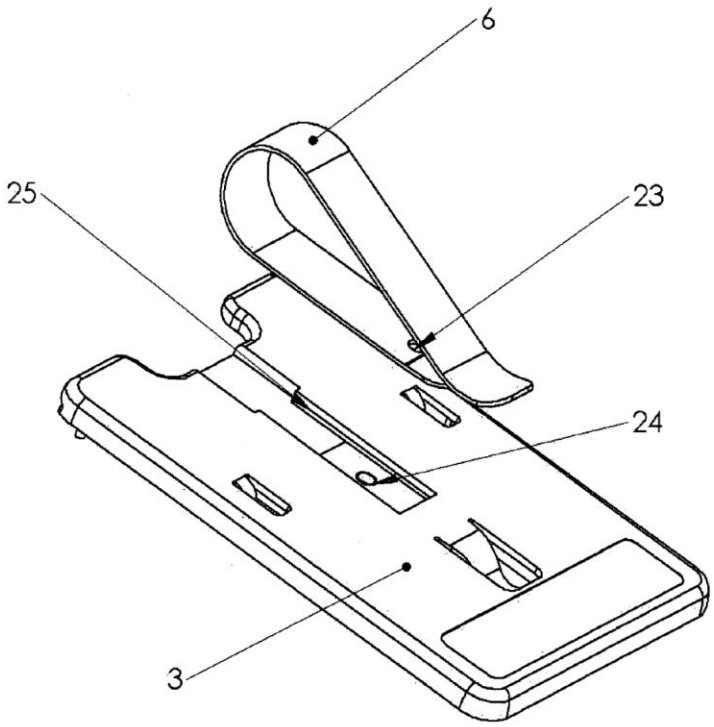
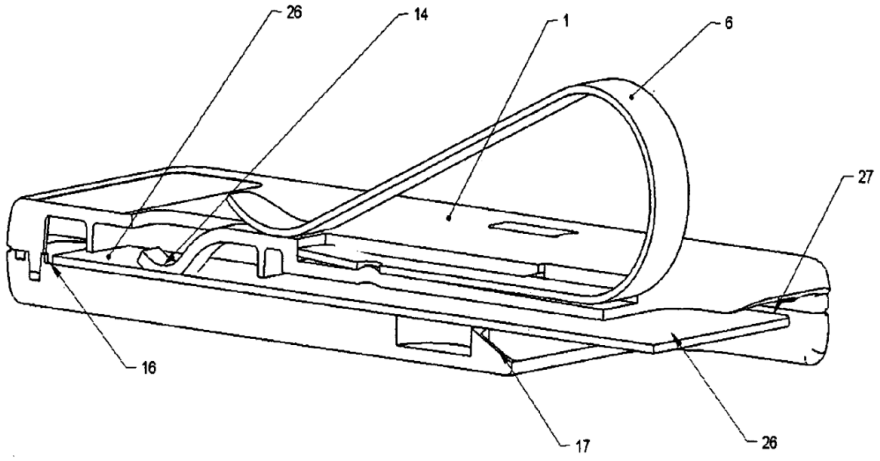


FIG. 4



(Ex. 1009 at FIGS. 4-5.)

IX. THE CHALLENGED CLAIMS ARE INVALID

A. Ground 1: Claims 1-9 and 11-21 of the '808 Patent are rendered obvious under 35 U.S.C. §103 (post-AIA) by Kane in view of U.S. Patent Pub. No. 2014/0060712 to Daniel Vern Beckley ("Beckley").

120. In my opinion, the Kane-Beckley combination discloses as a whole Claims 1-9 and 11-21 of the '808 Patent.

1. Claim 1

a. "A compact wallet, comprising:"

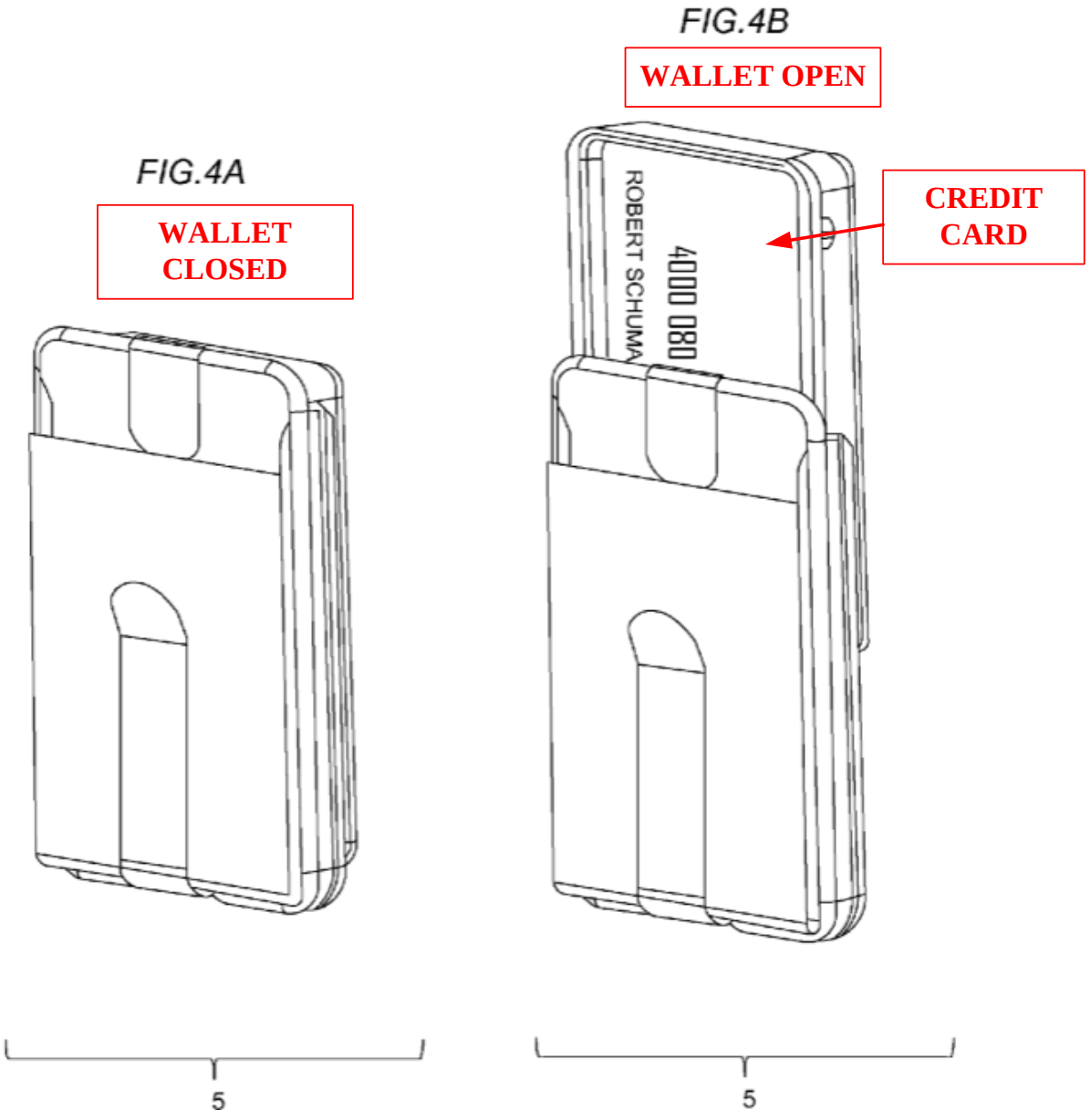
121. I understand that a preamble of a claim is generally not limiting unless it gives life and meaning to a claim or provides necessary antecedent basis for terms appearing later in the claim.

122. This preamble recites the structural limitation, "compact wallet"; which is referenced later in the claim as "wallet". Even if the preamble were to be interpreted as limiting, in my opinion any limitation that may be found in the preamble is disclosed by both Kane and Beckley.

123. Kane discloses wallets that are compact. (Ex. 1006 at 2: "an extremely thin wallet that isn't limited in its capacity," 3: "[l]ow profile to easily fit in your front pocket," 4-5: photographs thereof.)

124. A POSITA reading Kane would understand that an extremely thin wallet that can fit in a front pants pocket constitutes a "compact wallet."

125. Likewise, Beckley discloses a wallet **5** that is compact. (Ex. 1007 at ¶ [0034]: "sized and adapted for use as a container for business cards.") For example, at least FIGS. 4A-4B illustrate that the silhouette of the wallet **5** can be about the size of a credit card.



(*Id*. FIGS. 4A-4B (*annotated*).)

126. Accordingly, in my opinion, the Kane-Beckley combination discloses the preamble of Claim 1.

b. "at least two rigid plates interposed to sandwich card-like contents there between, each rigid plate having a longitudinal extent;"

127. In my opinion, Kane discloses this limitation.

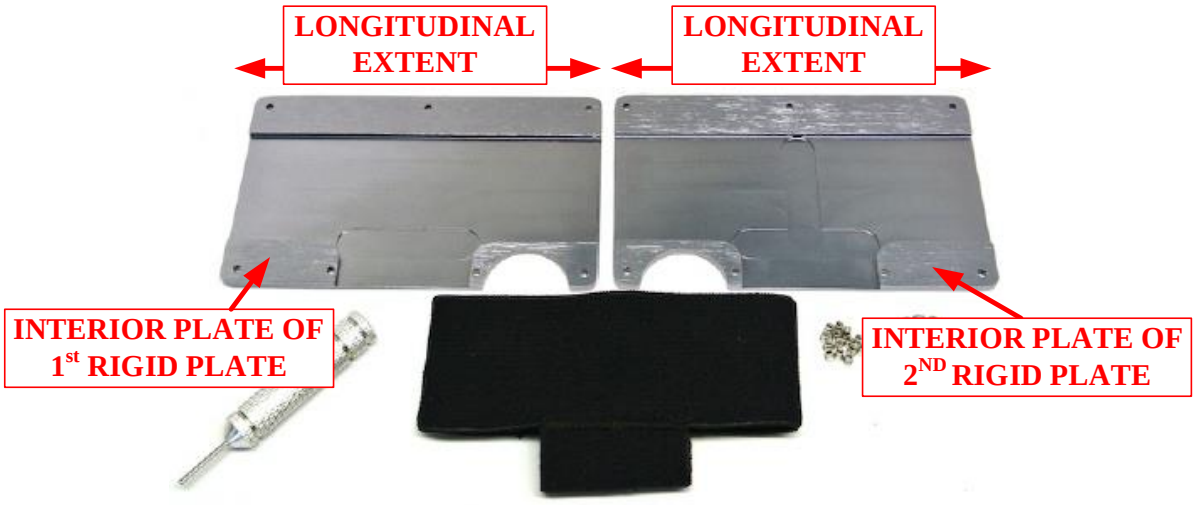
128. Kane discloses a wallet composed of at least two plates, with each plate including an interior plate and an outer faceplate fastened thereto. (Ex. 1006 at 7: "Seven hex screws machined from scratch secure the inner and outer plates allowing for replaceable elastic and interchangeable faceplates.") A POSITA, reading Kane, would have understood the combination of an interior plate and secured outer faceplate to constitute the claimed "rigid plate," and that Kane discloses at least two of such "rigid plates." For example, Kane discloses multiple photographs, such as the annotated photograph below, showing compact wallets with a first and second "rigid plate."



(*Id.* at 6 (*annotated*).)

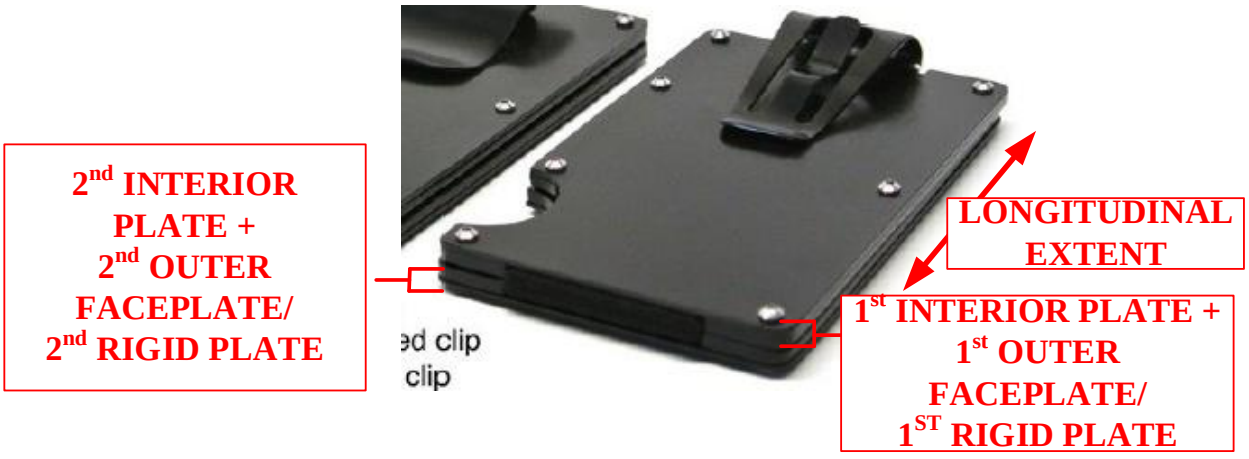
129. Further, at the time of the Critical Date, and before, a POSITA would have understood an interior plate made of anodized aircraft grade aluminum to be rigid. (*Id*. at 5: "The track runs along two hollow interior plates machined from anodized aircraft grade aluminum.") Moreover, a POSITA would have understood that the rigidity of the interior plates would further increase once the interior plates are secured to the outer faceplates, composed of aluminum, titanium, or carbon fiber. (*Id*. at 6: "You can choose between Titanium, Aluminum, or Carbon Fiber for the outer faceplates.")

130. A POSITA, reading Kane, would understand that the interior plate-outer faceplate pairs ("rigid plates") have a substantially rectangular shape, and the length thereof would constitute the claimed "longitudinal extent." For example, Kane discloses a photograph of the two interior plates of the interior plate-outer faceplate pairs ("rigid plates").



(*Id.* at 5 (*annotated*).)

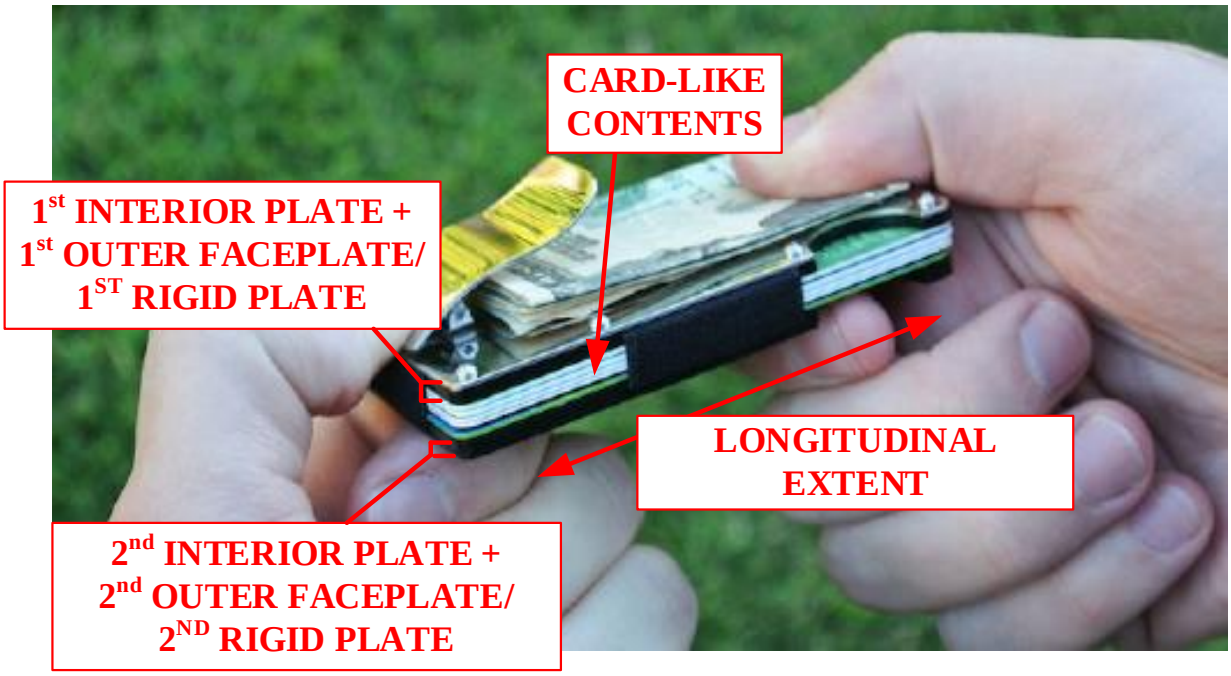
131. Additionally, Kane discloses multiple photographs, such as the magnified and annotated photograph below, showing the longitudinal extent of the interior plate-outer faceplate pairs ("rigid plates").



(*Id.* at 7 (*annotated*).)

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132. Moreover, Kane provides multiple photographs of card-like contents being interposed and sandwiched between the interior plate-outer faceplate pairs ("rigid plates"). For example, Kane discloses the following photograph that shows the rigid plates, card-like contents, and longitudinal extent thereof.

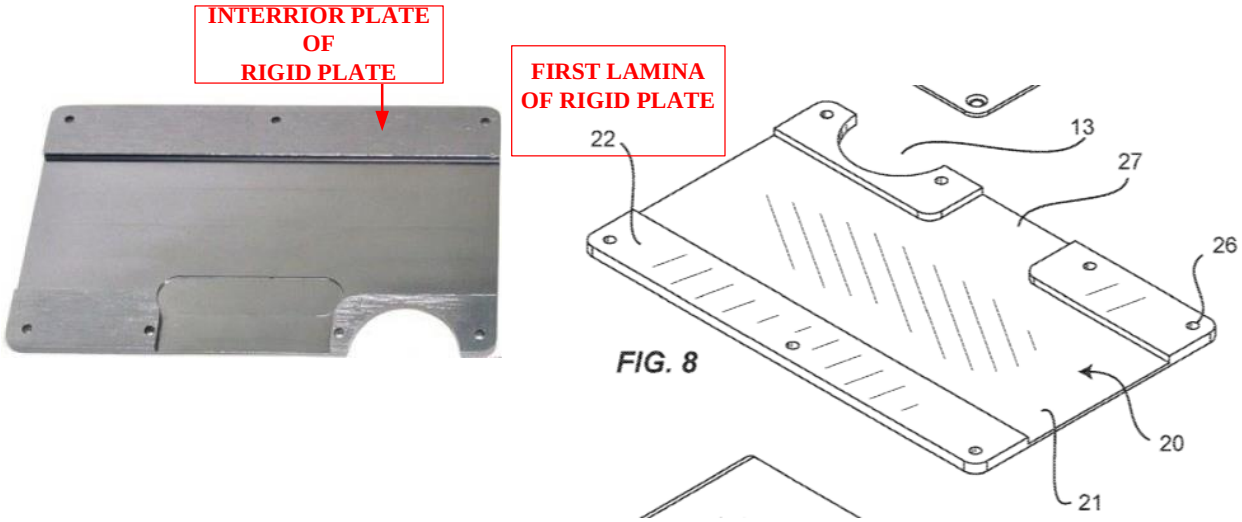


(*Id.* at 4 (*annotated*).)

133. In my opinion, a POSITA, reading Kane, would have understood the interior plate and coupled outer faceplate to collectively define a rigid plate in the same manner described by the '808 Patent, where each rigid plate **10** is composed of a first lamina **22** and a second lamina **23**. (EX. 1001 at 4:20-38.)

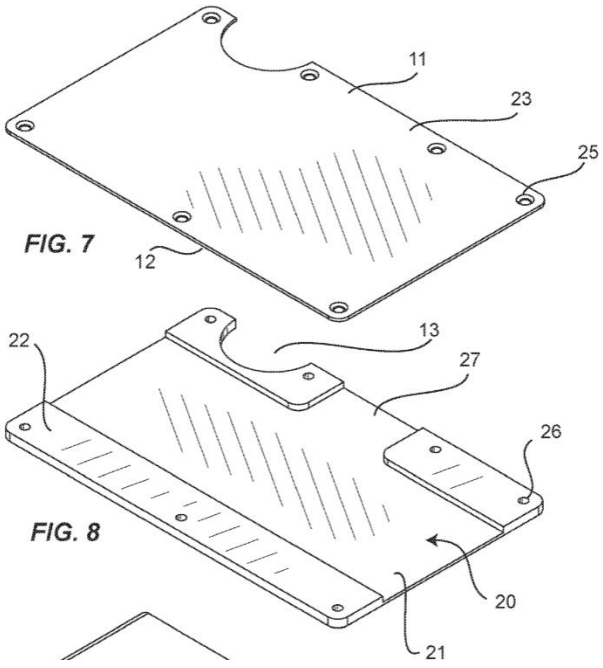
134. Below is a side-by-side display of an interior plate disclosed by Kane (left) and a first lamina **22** of a rigid plate **10** disclosed in FIG. 8 of the '808 Patent (right).

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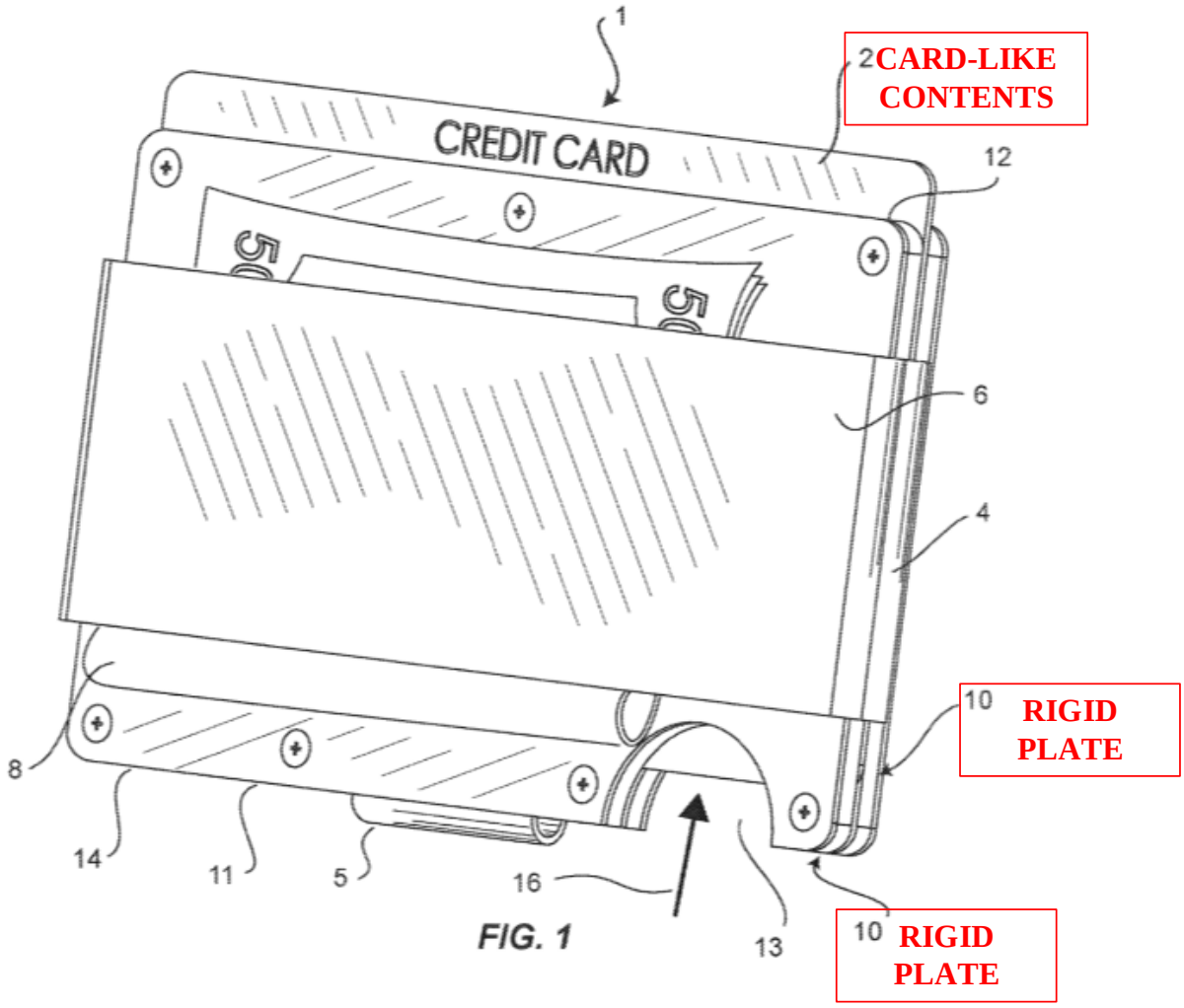
(*Id*. at 5 (*annotated*); Ex. 1001, FIG. 8 (*annotated*).)

135. As discussed above, in my opinion, the interior plate disclosed by Kane is coupled with an outer faceplate to form a rigid plate in the same manner depicted in FIGS. 7-8 of the ’808 Patent.



(*Id*. FIGS. 7-8.)

136. Likewise, in my opinion, a POSITA would have understood the interior plate-outer faceplate pairs ("rigid plates") to sandwich card-like contents in the same manner as depicted in FIG. 1 of the '808 Patent.



(Ex. 1001 FIG.1 (*annotated*).)

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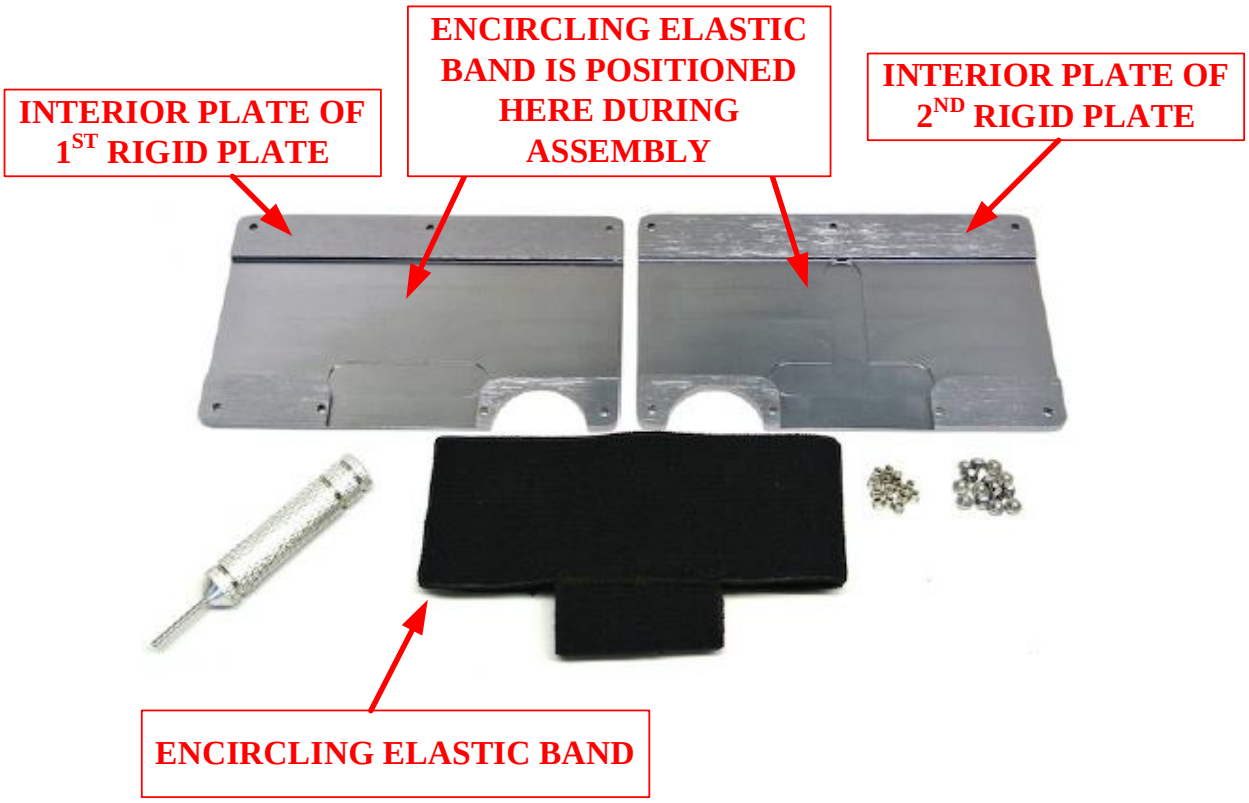
137. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 1.

c. "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;"

138. In my opinion, Kane discloses this limitation. Kane discloses an elastic band configured in a loop to encircle the interior plates of the interior plate-outer faceplate pairs. (*Id*. at 3-5.) Additionally, Kane discloses the encircling elastic band as being interposed with the two interior plate-outer faceplate pairs, along the longitudinal extent thereof. (Ex. 1006 at 4: "[i]mproved and replaceable elastic"; *Id*. at 3: "Includes spare black elastic and tool"; *Id*.: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange outer plates.")

139. For example, Kane discloses the following annotated photographs that depict the encircling elastic band and the band's interposition with the two interior plate-outer faceplate pairs ("rigid plates").

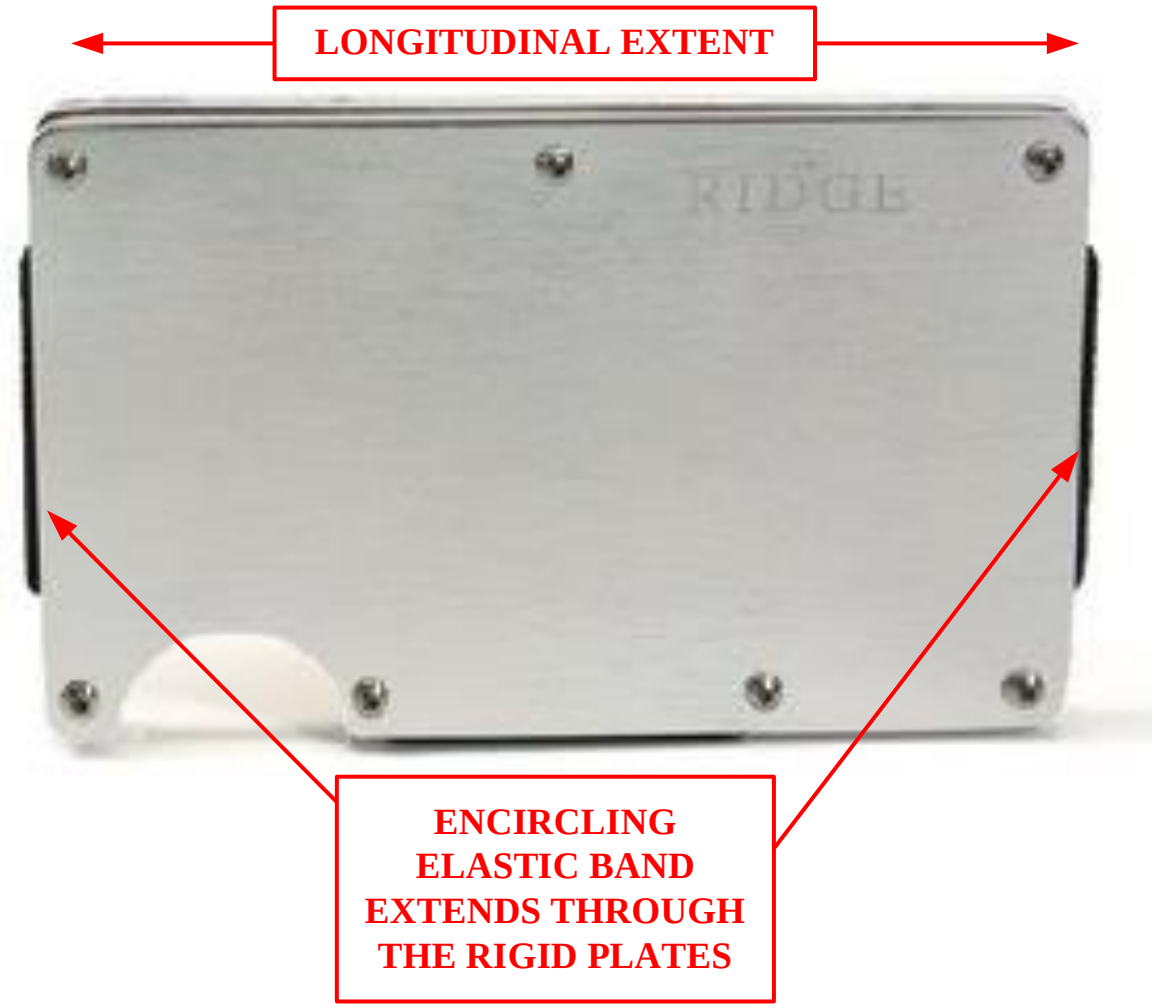
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(*Id.* at 5 (*annotated*).)



(*Id.* (*annotated*).)



(*Id.* at 10 (*annotated*).)

140. In my opinion, a POSITA, reading Kane, would have understood that each of the interior plate-outer faceplate pairs ("rigid plates") are positioned back-to-back and encircled by the loop of elastic band ("encircling elastic band"), which in turn biases the interior plate-outer faceplate pairs ("rigid plates") inwardly (*i.e.*, towards each other). As evidenced from the photographs, card-like contents are

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inserted between the interior plate-outer faceplate pairs ("rigid plates") and/or removed from between the interior plate-outer faceplate pairs ("rigid plates").

141. Additionally, Kane discloses that the encircling elastic band expands/contracts to provide elastic volume between the interior plate-outer faceplate pairs ("rigid plates") for adding or removing contents. (*Id*. at 2: "[w]ith an integrated elastic track, The Ridge 2.0 can accommodate various numbers of cards without losing elasticity"; *Id*. at 5: "[t]he Integrated Elastic Track [sic] can expand to hold up to 12 cards and then immediately contract to hold a single card securely.")

142. For example, Kane discloses the following photograph showing the elastic volume between the two interior plate-outer faceplate pairs ("rigid plates") while adding or removing contents.

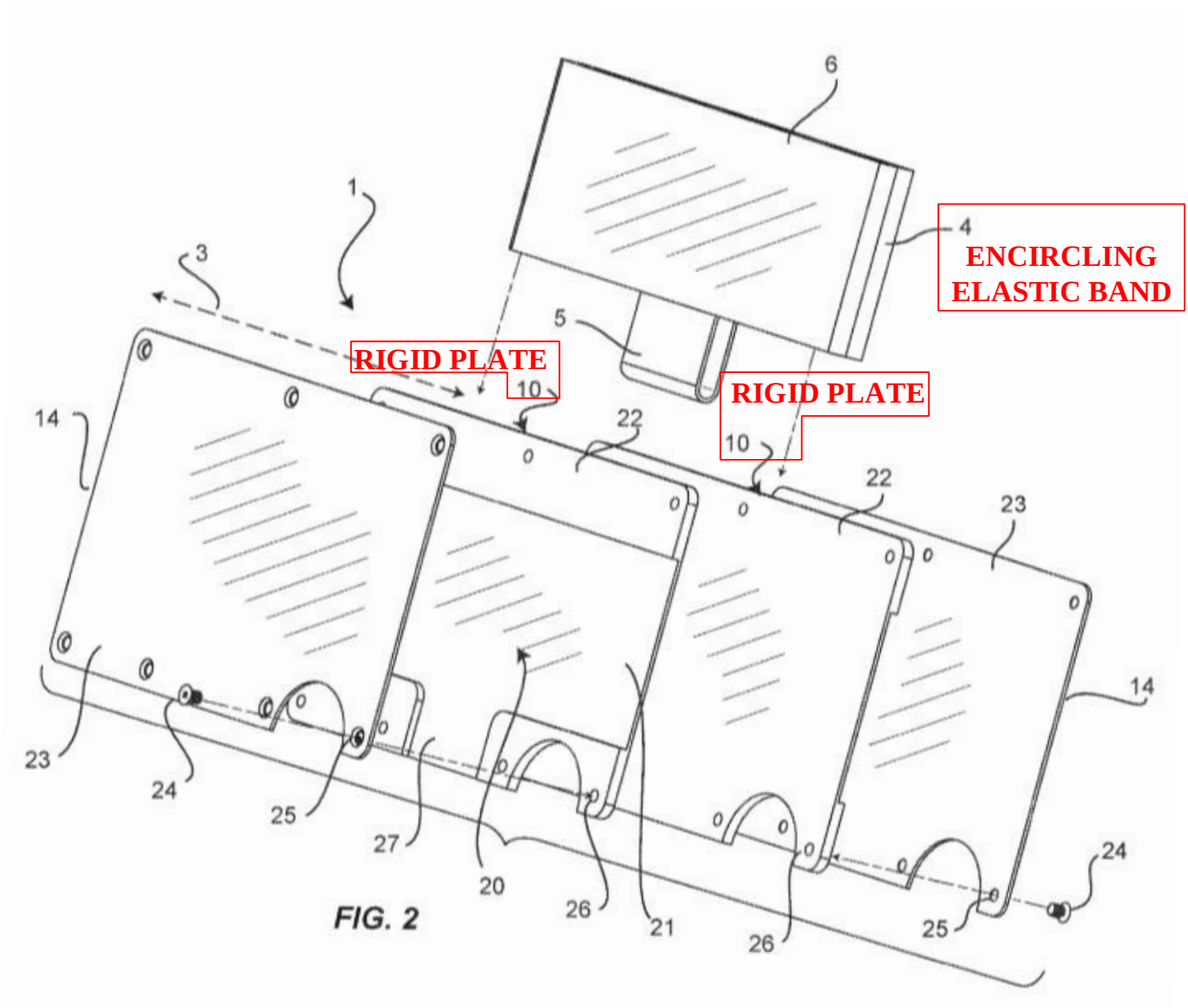


(*Id*. (*annotated*))

143. In my opinion, a POSITA, reading Kane, would have understood the encircling elastic band and the interior plate-outer faceplate pairs ("rigid plates") to

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be interposed in the same manner as the encircling elastic band **4** and rigid plates **10** depicted in FIGS. 2 and 10 of the ’808 Patent.



(Ex. 1001 FIG. 2 (*annotated*).)

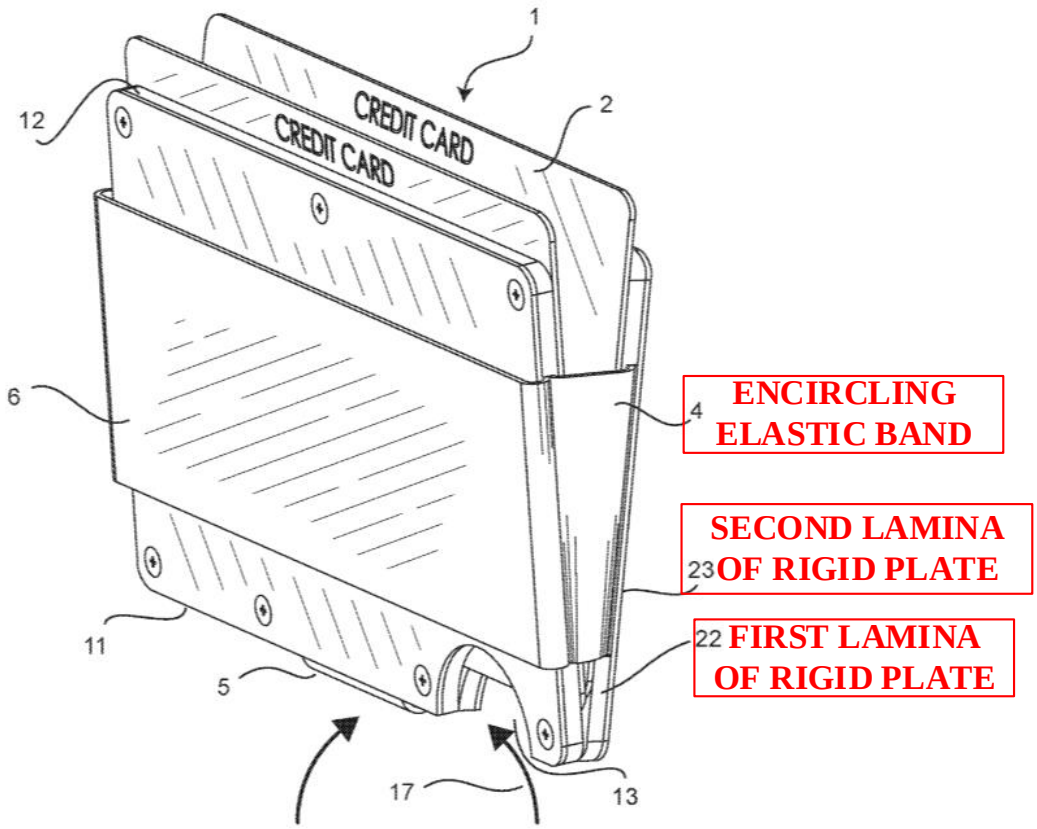


FIG. 10

(*Id.* FIG. 10 (*annotated*).)

144. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 1.

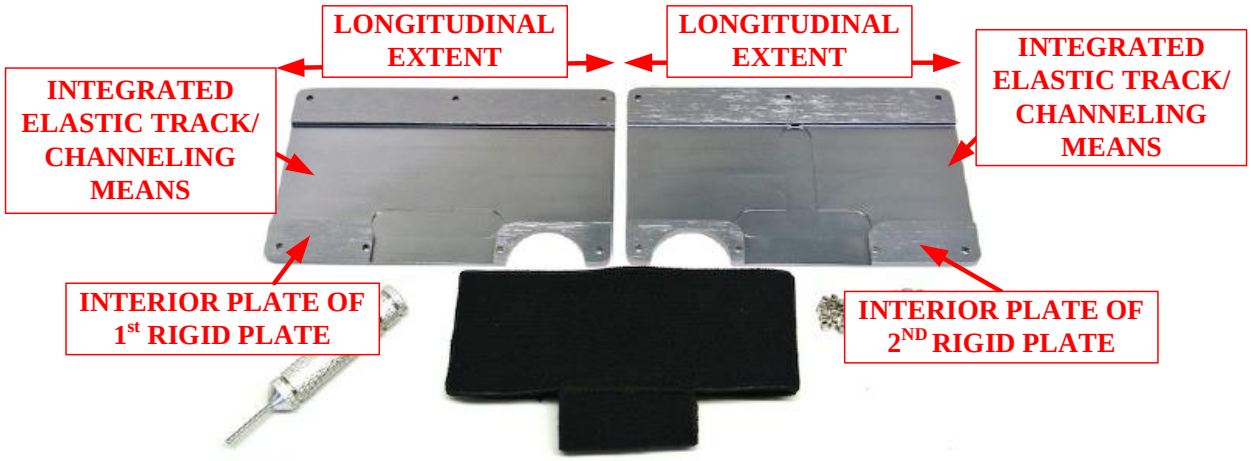
d. "a channeling means configured to minimize the profile of the wallet and hold position of the at least one encircling elastic band with respect to each rigid plate while allowing freedom for the dynamic extension and contraction of the band over the entire running length thereof; and"

145. In my opinion, Kane discloses this limitation.

146. Kane discloses an integrated elastic track extending along the extent of each of the interior plate-outer faceplate pairs ("rigid plates") and configured to

minimize the profile of the wallet. (Ex. 1006 at 8; *Id*. at 3: "low profile to easily fit in your front pocket.") A POSITA, reading Kane, would have understood the integrated elastic track to constitute the claimed "channeling means."

147. For example, Kane discloses the following photograph of the interior plates ("rigid plates"), where the integrated elastic track is shown as a groove in the interior plates ("rigid plates").



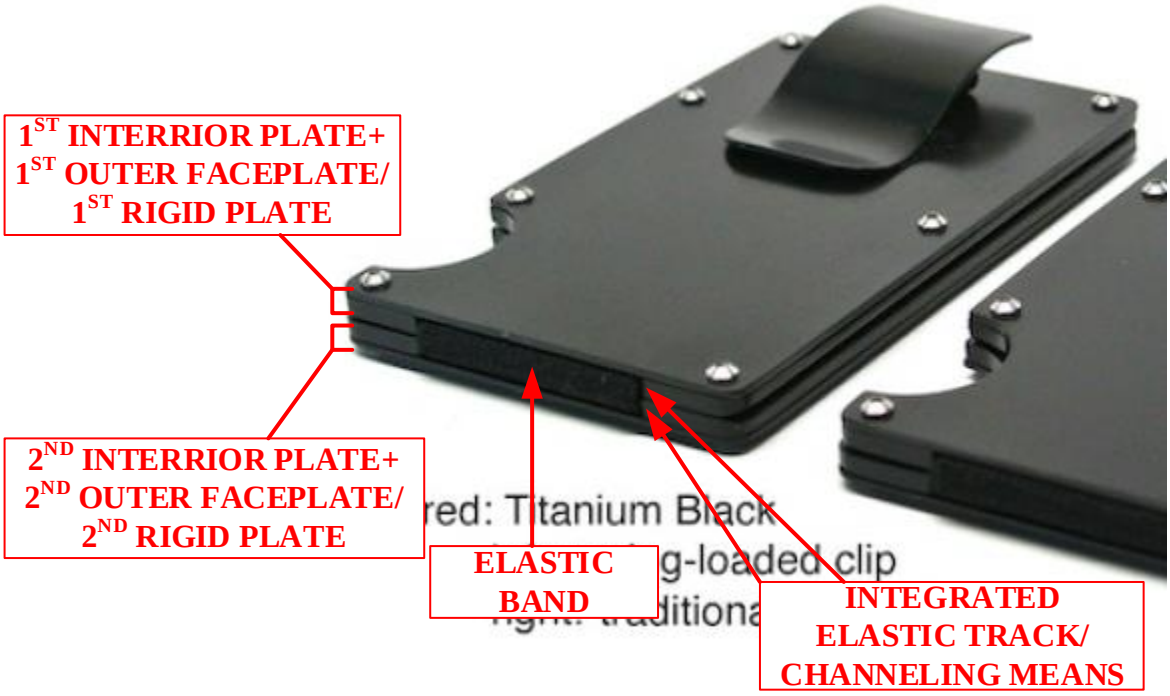
(*Id.* at 5 (*annotated*).)

148. In my opinion, a POSITA, reading Kane, would have understood the integrated elastic track ("channeling means") of the interior plate-outer faceplate pairs ("rigid plates") to minimize the profile of the wallet, (*e.g.*, as compared to interposing the encircling elastic band on interior plates without a groove).

149. Further, Kane discloses that the integrated elastic track ("channeling means") holds the position of the encircling elastic band with respect to each interior

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plate-outer faceplate pair ("rigid plate"). For example, Kane discloses multiple photographs, such as the magnified and annotated photograph below, of the integrated elastic track ("channeling means") visible from a side perspective of the wallet; where the encircling elastic band is shown positioned in the integrated elastic track (*i.e.*, within the groove running the length of the interior plates).



(*Id.* at 7 (*annotated*).)

150. A POSITA, reading Kane, would have understood that the integrated elastic track ("channeling means") holds the position of the encircling elastic band by inhibiting the band from sliding laterally off the central longitudinal axis of the compact wallet.

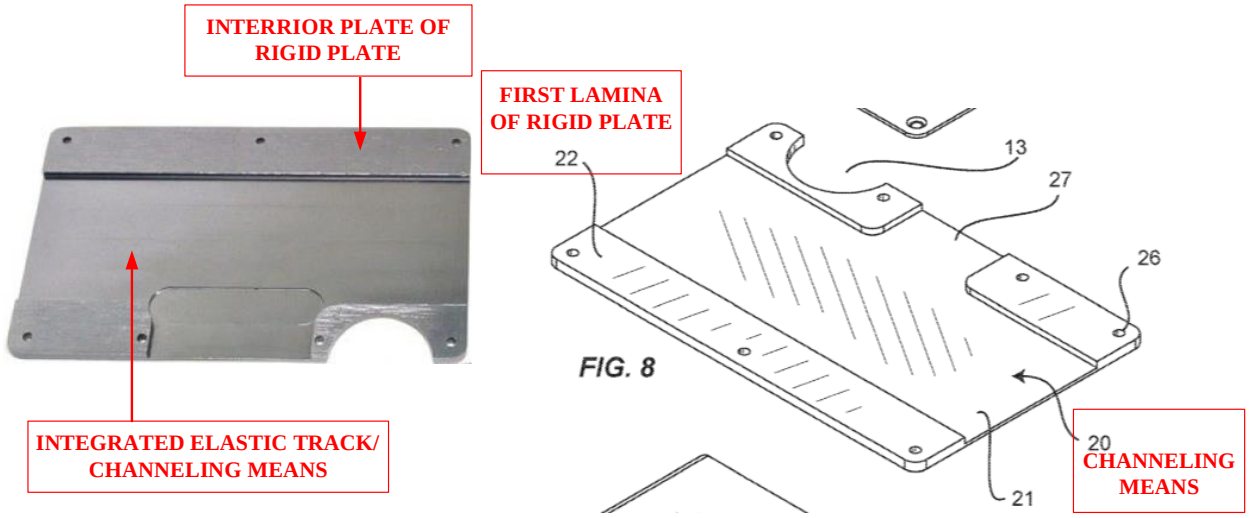
151. In addition, Kane discloses that the integrated elastic track ("channeling means") allows for the freedom of dynamic extension and contraction of the band over the entire running length thereof. (*Id*. at 5: "The Integrated Elastic Track [sic] can expand to hold up to 12 cards and then immediately contract to hold a single card securely.") For example, Kane discloses the following photograph that depicts the dynamic extension and contraction over the entire running length of the encircling elastic band.



(*Id.* (*annotated*))

152. In my opinion, a POSITA, reading Kane, would have understood the integrated elastic track to be identical, or at least equivalent to, the channeling means **20** depicted in FIG. 8 of the '808 Patent. Below is a side-by-side display of an interior plate and integrated elastic track disclosed by Kane (left) along with a first lamina **22** of a rigid plate **10** and channeling means **20** disclosed in FIG. 8 of the '808 Patent (right).

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(*Id*. at 5 (*annotated*); Ex. 1001 FIG. 8 (*annotated*).)

153. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 1.

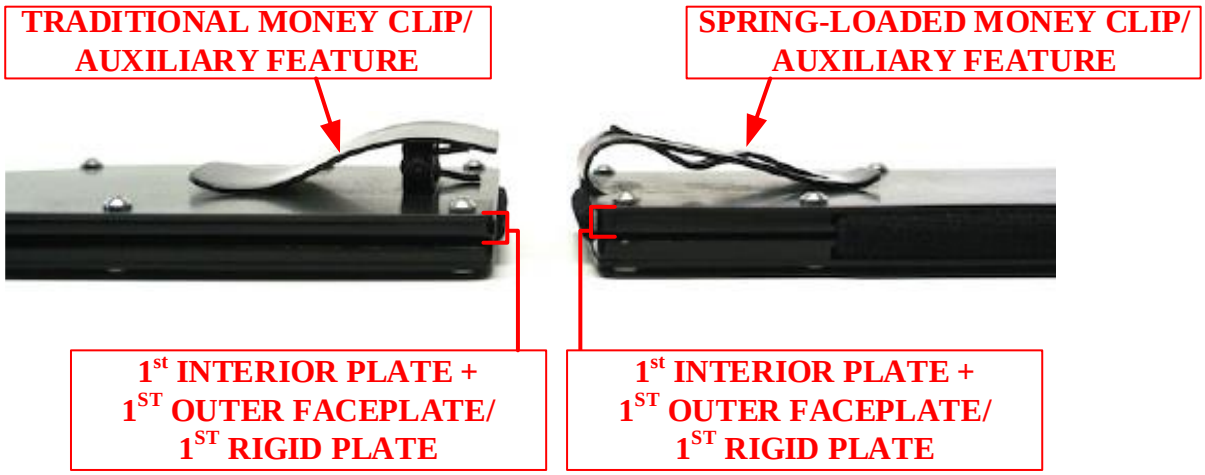
e. "an auxiliary feature removably attached to at least one of the at least two rigid plates,"

154. In my opinion, the Kane-Beckley combination discloses this limitation.

155. Kane discloses compact wallets with a "traditional money clip design" or a "spring-loaded clip." (Ex. 1006 at 7.) A POSITA, reading Kane, would have understood the money clips to constitute an "auxiliary feature."

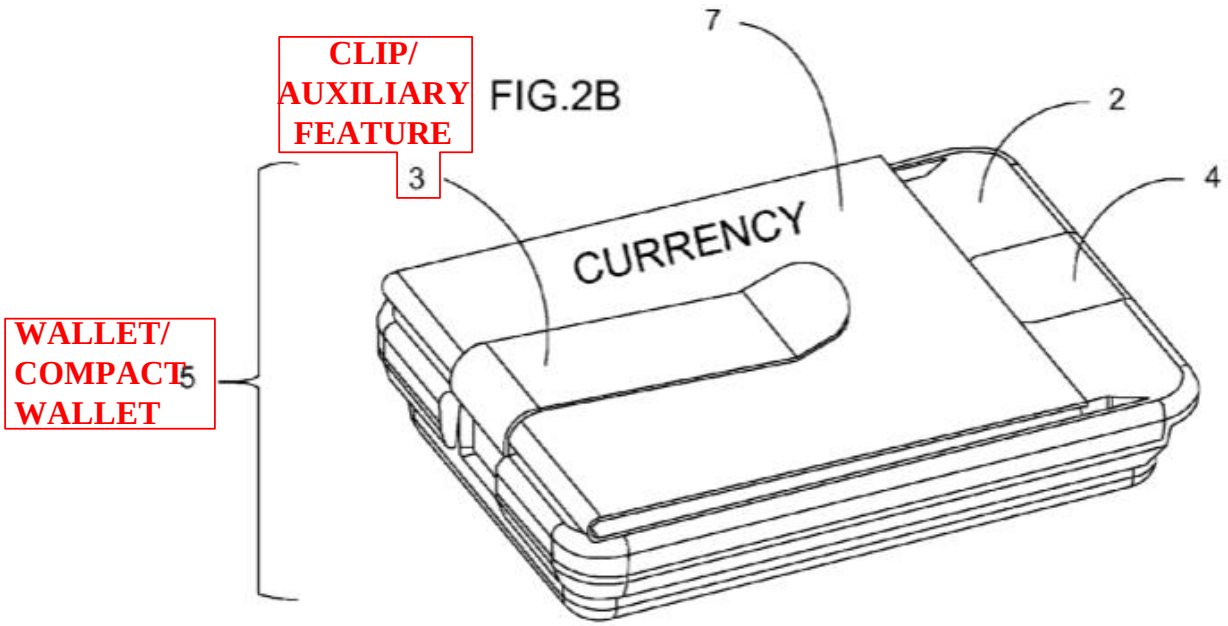
156. For example, Kane discloses multiple photographs, such as the photograph below, of wallets having a money clip ("auxiliary feature) attached to at least one of the interior plate-outer faceplate pairs ("rigid plates").

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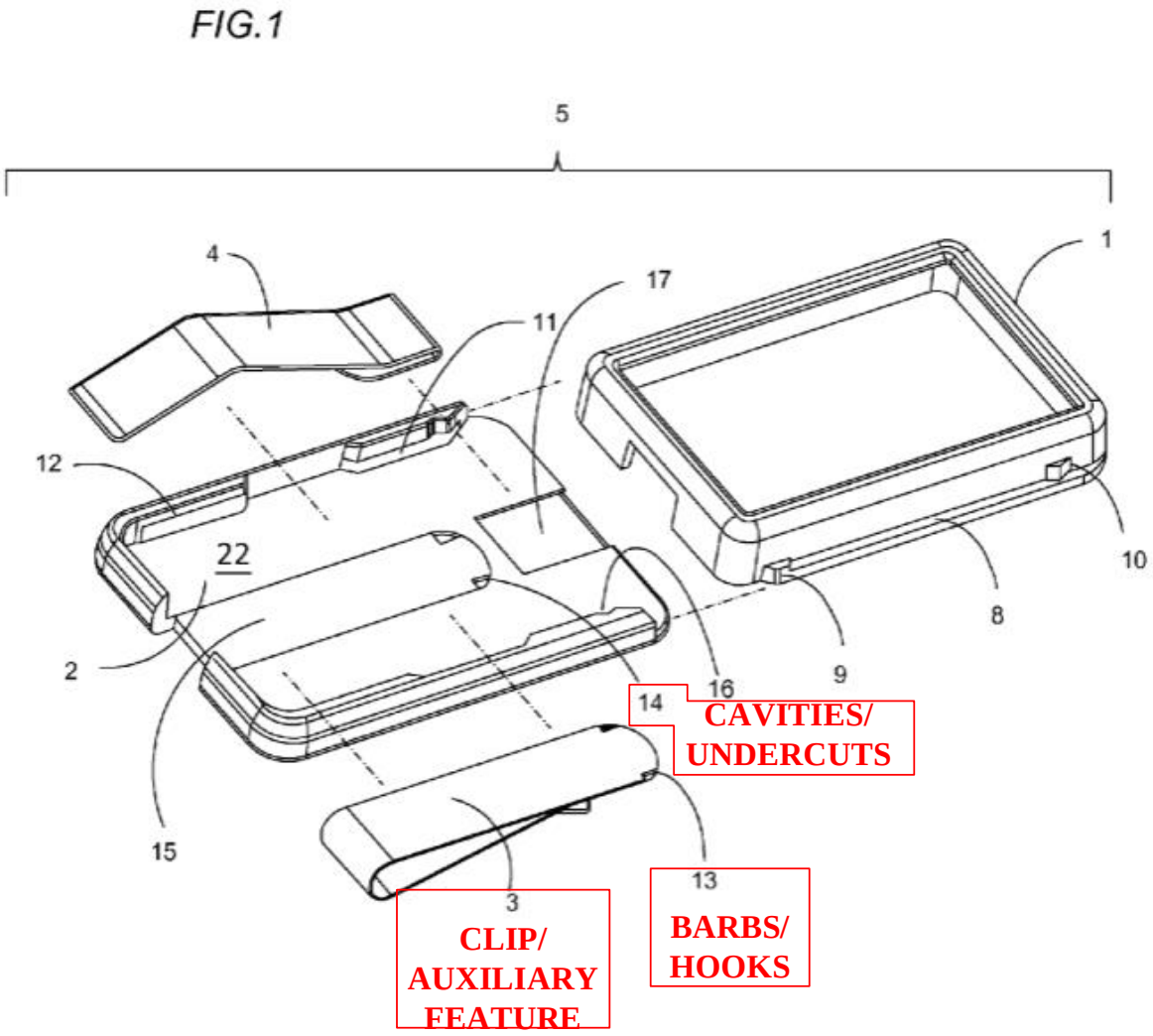
(*Id.* at 6 (*annotated*).)

157. Similarly, Beckley discloses attaching an auxiliary feature to a compact wallet. (Ex. 1007 at ¶ [0034]: "clip **3**… generally configured for holding paper currency… the clip **3** may be used to fasten the container to another object such as a pocket, personal organizer or book, for example," FIGS. 1-2B, 4A-5B, and 6A-6B.) A POSITA, reading Beckley, would have understood the clip **3** to constitute the claimed "auxiliary feature." For example, FIG. 2B of Beckley discloses the clip **3** ("auxiliary feature") attached to the wallet **5**.



(*Id.*, FIG. 2B (*annotated*).)

158. Further, Beckley discloses that the clip **3** ("auxiliary feature") is removably attached to the wallet **5**. (*Id*. at ¶ [0038]: "[the clip **3**] is held in place by a pair of barbs seen at **13** mated into a set of cavities **14** on the base **2**," and FIG. 1.) For example, Beckley's FIG. 1 depicts a means for removably attaching the clip **3** ("auxiliary feature") to the base **2** via an engagement of barbs **13** and cavities **14**.



(*Id.*, FIG. 1 (*annotated*).)

159. A POSITA, reading Beckley, would have understood that the clip **3** ("auxiliary feature") is attached to the base **2** of the wallet **5** in a removable fashion at least because removing the clip **3** ("auxiliary feature") can be readily accomplished by unseating the barbs **13** from the cavities **14**. For instance, the container **1** can be slid off the base **2** (as shown in FIG. 1) to access and displace the barbs **13**.

160. In my opinion, to the extent it were found that Kane does not disclose the money clip ("auxiliary feature") as removable, a POSITA would have looked to Beckley for guidance on how to removably attach a money clip ("auxiliary feature") to one or more of the interior plate-outer faceplate pairs ("rigid plates") because Beckley and Kane are in the same technical field, address similar problems, utilize similar devices, and disclose structural features that, when combined, function in the same manner as each does separately to yield predictable results.

161. Kane and Beckley both disclose innovations in the field of card holder wallets. (Ex. 1006 at 2: "re-designed wallet system… providing an extremely thin wallet;" Ex. 1007 at ¶ [0002]: "This disclosure relates in general to a wallet," ¶ [0033]: "Referring now to FIGS. 1-8, a wallet is shown generally at **5**.")

162. Kane and Beckley both address problems of limited storage and bulkiness attributed to previously known wallet designs. (Ex. 1006 at 2: "The Ridge 2.0 [is] Designed to be an encompassing alternative to a bulky traditional leather wallet and a dedicated minimalist wallet that can only hold a few cards"; Ex. 1007 at ¶ [0004]: "wallets are, in general, made from fabric and/or leather goods and sewn to form storage pockets… these storage pockets are typically sewn to hold one card or few cards. Each pocket adds a layer of material, increasing the wallet's overall thickness and limiting the amount of cards a wallet can carry. The result is that the wallet becomes bulky….")

163. Kane and Beckley both utilize compact wallets that sandwich card-like contents between two plates and provide an external clip for additional functionality. (Ex. 1006 at 3: "expandable track that can accommodate a various number of cards," 4: "improved traditional money clip design," "designed additional money clip with an internal spring (spring-loaded)," 5:photographs thereof; Ex. 1007 at ¶ [0008]: "The container portion and base portion… form a void space sized and configured to hold the plurality of articles," ¶ [0010]: "Certain embodiments of the invention include an exterior clip configured to receive and hold currency… clip **3** in this embodiment is generally configured for holding a paper currency," FIGS. 2B and 4B.)

164. Further, the interior plate-outer faceplate pairs ("rigid plates") disclosed by Kane function to secure the card-like contents of the wallet and provide RFID protection. (Ex. 1006 at 3: "block RFID-skimming devices… accommodate a various number of cards," 5: "[t]he Integrated Elastic Track can expand up to 12 cards and then immediately contract to hold a single card securely," photographs thereof, 8: "top of the inner plates are tapered to let you easily slide additional cards into the wallet… The Ridge's aluminum interior plates block RFID, keeping your information safe.") The removably attached clip ("auxiliary feature") disclosed by Beckley function to secure paper currency to a wallet's exterior. (Ex. 1007 at ¶ [0010]: "an exterior clip configured to receive and hold currency," ¶ [0034]: "clip 3

in this embodiment is generally configured for holding paper currency," FIG. 2B.) When combined, the interior plate-outer faceplate pairs ("rigid plates") continue to secure the card-like contents in a predictable fashion, and the removably attached clip ("auxiliary feature") continues to secure paper currency in a predictable fashion.

165. In combining the teachings of Kane and Beckley, a POSITA would use a known technique to improve similar devices in the same way. The technique of configuring compact wallets with an attached money clip ("auxiliary feature") that is removable was within the realm of ordinary capabilities of a POSITA based upon the teachings by at least Beckley. (Ex. 1007 at ¶¶ [0038]-[0039], FIG. 1.) Further, a POSITA would have been capable of applying this known method of configuring the compact wallet of Kane to yield predictable results. (Ex. 1006 at 4: "improved traditional money clip design… designed additional money clip with an internal spring (spring-loaded)," photographs thereof.)

166. Having reviewed Beckley, such a POSITA would have been motivated to removably attach a money clip ("auxiliary feature"), like that disclosed by Beckley, to an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, to provide a compact wallet that allows a consumer to remove the money clip ("auxiliary feature") when not needed, in accordance with the minimalist preferences inherent to the compact wallet marketplace. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 7:

photographs thereof, 9-10: "without money clip… with traditional money clip… with spring-loaded money clip," and photographs thereof, 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences.")

167. Moreover, a POSITA would have had good reason to incorporate the teachings of Beckley into Kane, as discussed above, with a reasonable expectation of success to advance the maintenance operations promoted by Kane, such as: "turning a wallet "into a 'system' that can be completely disassembled by the user to replace the elastic and exchange outer plates for greater personalization." (Ex. 1006 at 3.) Rendering a money clip ("auxiliary feature") removable, as disclosed by Beckley, advances the disassembly and personalization of the wallets, as suggested by Kane.

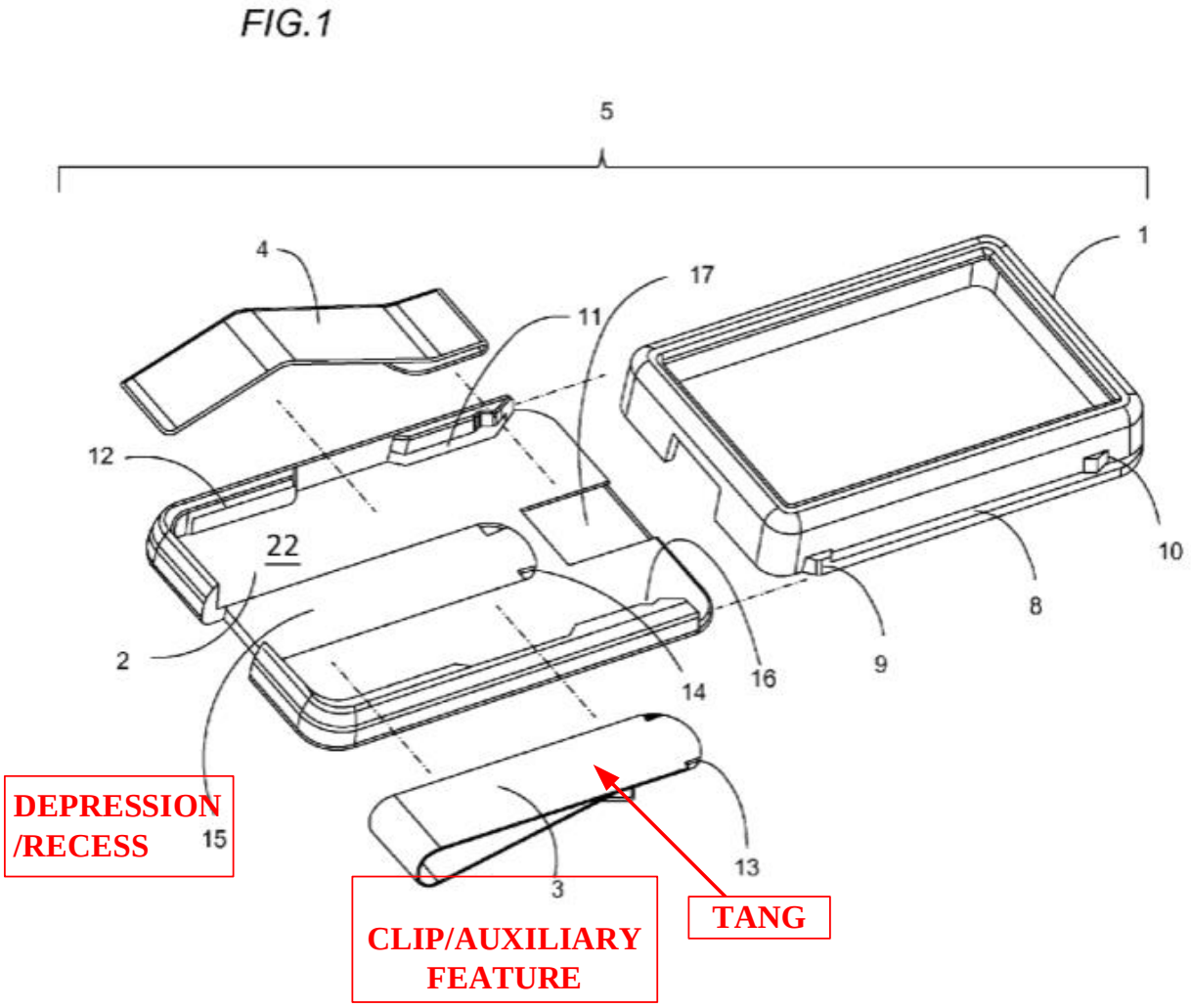
168. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 1.

f. "the auxiliary feature having a tang insertable into a recess formed inside the at least two rigid plates,"

169. In my opinion, the Kane-Beckley combination discloses this limitation.

170. Beckley discloses a clip **3** ("auxiliary feature") having a tang that is inserted into a depression **15**. (Ex. 1007 at ¶ [0039]: "the clip **3** is assembled to the base **2** by inserting the clip **3** into a depression **15** as described hereinabove.") For

example, Beckley's FIG. 1 depicts the clip **3** ("auxiliary feature") having a tang that is insertable into the depression **15** ("recess").



(*Id.* FIG. 1 (*annotated*).)

171. In my opinion, A POSITA, reading Beckley, would have understood the depression **15** to constitute the claimed "recess." For example, Beckley's depression **15** is a groove having a sidewall that is adjacent to a longitudinally extending groove (*e.g.*, adjacent to pocket **17**). Additionally, Beckley understood the depression **15**,

which receives the tang of the clip **3**, is a surface groove or depression that defines an indentation occurring in a surface of the base **2**.

172. Further, to the extent it were found that Beckley does not disclose a recess formed inside a rigid plate, a POSITA would have been motivated to form a depression ("recess"), like that disclosed by Beckley, into an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, to effectuate the removable attachment of a money clip ("auxiliary feature"), like that disclosed by Beckley and discussed above, because Kane and Beckley are in the same technical field, address similar problems, utilize similar devices, and disclose methods that when combined function in the same manner as each does separately to yield predictable results. In doing so, the POSITA would apply a known technique to a known device ready for improvement to yield predictable results, as set forth in Section IX.A.1.e; which is incorporated here. (Ex. 1006 at 2-5 and 8-9; Ex. 1007 at ¶¶ [0002], [0004], [0008], [0010], [0034], [0038]-[0039], and FIG. 1.)

173. For example, a POSITA would be motivated to form a depression ("recess"), like that disclosed by Beckley, in an interior plate of an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, to effectuate the removable attachment of a clip ("auxiliary feature") to compact wallet. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 15-16: "Our biggest challenge is conveying our idea and creating a product

that is versatile enough to suit a wide range of people and preferences;" Ex. 1007 at ¶¶ [0034], [0038]-[0039], and FIG. 1.) Moreover, forming a depression ("recess), like that disclosed by Beckley, in an interior plate of an interior plate-outer faceplate pair, like that disclosed by Kane, would be a mere continuation of one or more milling operations conducted to form the integrated elastic track ("channeling means"). As such, forming a depression ("recess), like that disclosed by Beckley, in an interior plate of a compact wallet, like that disclosed by Kane, would not require any additional machinery to manufacture, and minimal additional costs, if any. Such milling operations are routine and very familiar to a POSITA at the time of the Critical Date.

174. Additionally, such a POSITA would have been motivated to form a depression ("recess"), like that disclosed by Beckley, inside an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, to provide a removably attachable money clip ("auxiliary feature") while minimizing the profile of the wallet, which is described as a "core design" feature by Kane. (Ex. 1006 at 3: "Core Design: Low profile to easily fit in your front pocket.")

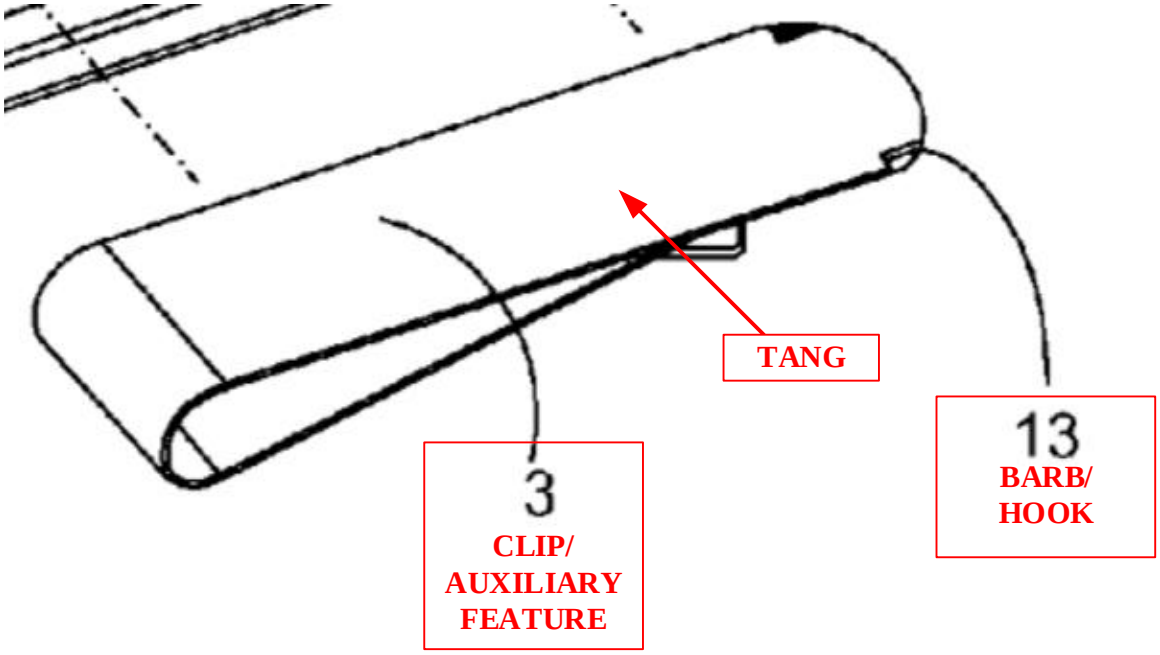
175. Accordingly, the Kane-Beckley combination discloses this limitation of Claim 1.

g. "the tang having a hook,"

176. In my opinion, the Kane-Beckley combination discloses this limitation.

177. Beckley discloses that the clip **3** ("auxiliary feature") has a pair of barbs **13**. (Ex. 1007 at ¶ [0038]: "[the clip **3**] is held in place by a pair of barbs seen at **13**.")

178. Further, Beckley's FIG. 1 discloses that the barbs are positioned on a tang of the clip **3** ("auxiliary feature"). For example, below is a magnified portion of Beckley's FIG. 1, illustrating the tang and barbs **13** of the clip **3** ("auxiliary feature").



(*Id.* at FIG. 1 (*annotated*).)

179. In my opinion, a POSITA, reading Beckley, would have understood one or more of the barbs **13** to constitute the claimed "hook." For example, Beckley's barbs **13** abruptly change direction from the trunk section of the clip **3** by extending perpendicularly to the tang. Further, Beckley's barbs **13** define a ledge (*e.g.*, a

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sidewall of the barbs **13**) that catches a corresponding cavity **14** in a depression **15** of the wallet base **2**. (*Id*. at ¶[0038]: "[the clip **3**] is held in place by a pair of barbs seen at **13** mated into a set of cavities **14** on the base **2**," and FIG. 1) Additionally, Beckley's barbs **13** constitute a curved or bent device for catching or holding. (*Id*.)

180. A POSITA would have been motivated to configure a compact wallet, like that disclosed by Kane, with a money clip ("auxiliary feature") having a tang with one or more barbs ("hook"), like that disclosed by Beckley, to effectuate the removable attachment of the money clip ("auxiliary feature"), because Kane and Beckley are in the same technical field, address similar problems, utilize similar devices, and disclose methods that when combined function in the same manner as each does separately to yield predictable results, as set forth in Section IX.A.1.e; which is incorporated here. (Ex. 1006 at 2-5 and 8-9; Ex. 1007 at ¶¶ [0002], [0004], [0008], [0010], [0034], [0038]-[0039], and FIG. 1.). In doing so, the POSITA would apply a known technique to a known device ready for improvement to yield predictable results.

181. Such a POSITA would have been motivated to configure a compact wallet, like that disclosed by Kane, with a money clip ("auxiliary feature") having a tang with one or more barbs ("hook"), like that disclosed by Beckley, to allow a consumer to remove the money clip when not needed, in accordance with the minimalist preferences inherent to the compact wallet marketplace. (Ex. 1006 at 6:

"The Ridge 2 is available with two different types of money clips or without a clip," 7: photographs thereof, 9-10: "without money clip… with traditional money clip… with spring-loaded money clip," and photographs thereof, 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences.")

182. Moreover, a POSITA would have had good reason to incorporate the teachings of Beckley into Kane, as discussed above, with a reasonable expectation of success to advance the maintenance operations promoted by Kane. For example, Kane discloses turning a wallet "into a 'system' that can be completely disassembled by the user to replace the elastic and exchange outer plates for greater personalization." (Ex. 1006 at 5.) Rendering the money clip ("auxiliary feature") removable via attachment by a barb ("hook"), as disclosed by Beckley, advances the disassembly and personalization of the wallets, as suggested by Kane. (Ex. 1006 at 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences.")

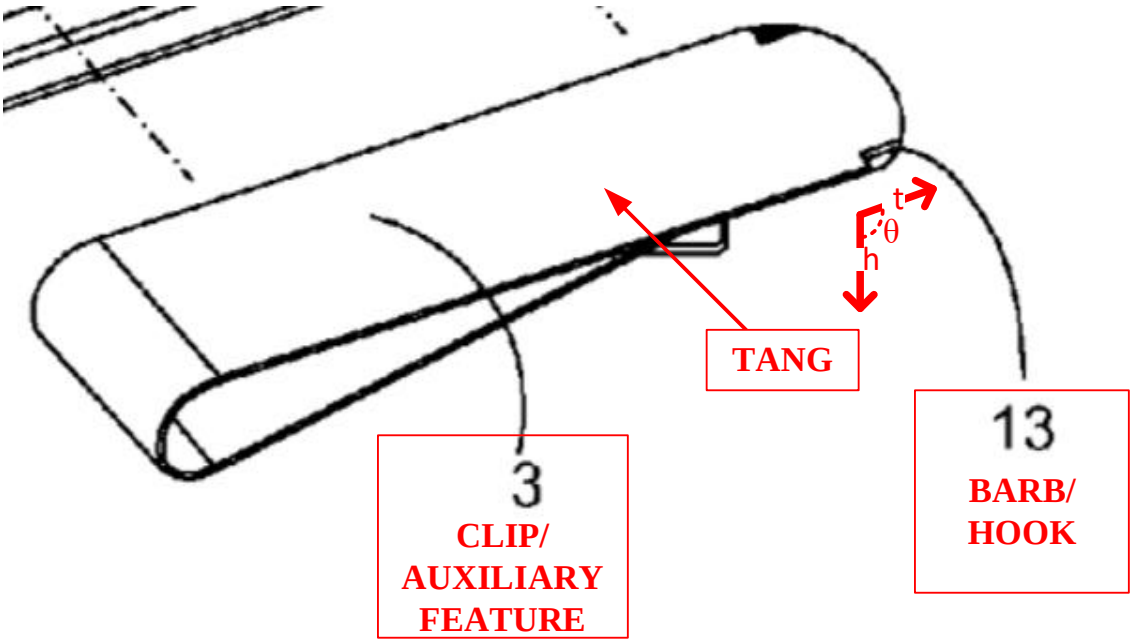
183. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 1.

h. "the hook extending at an angle to the tang,"

184. In my opinion, the Kane-Beckley combination discloses this limitation.

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185. FIG. 1 of Beckley depicts the barbs **13** ("hook") extending in a substantially perpendicular direction to the tang of the clip **3** ("auxiliary feature"). Provided below is magnified portion of FIG. 1, annotated in red to delineate the direction at which the tang extends (t), the direction at which the barbs **13** ("hook") extend (h), and the angle therebetween (θ).



(Ex. 1007, FIG. 1 (*magnified, annotated*).)

186. A POSITA would have been motivated to configure a compact wallet, like that disclosed by Kane, with a money clip having a tang with one or more barbs ("hook") extending at an angle therefrom, like that disclosed by Beckley, to achieve a removable money clip because Kane and Beckley are in the same technical field, address similar problems, utilize similar devices, and disclose methods that when combined function in the same manner as each does separately to yield predictable

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results, as set forth in Section IX.A.1.e; which is incorporated here. (Ex. 1006 at 2-5 and 8-9; Ex. 1007 at ¶¶ [0002], [0004], [0008], [0010], [0034], [0038]-[0039], and FIG. 1.). In doing so, the POSITA would apply a known technique to a known device ready for improvement to yield predictable results.

187. Such a POSITA would have been motivated to configure a compact wallet, like that disclosed by Kane, with a money clip having a tang with one or more barbs ("hook") extending at an angle therefrom, like that disclosed by Beckley, to achieve a removable attachment of the money clip that allows a consumer to remove the money clip when not needed, in accordance with the minimalist preferences inherent to the compact wallet marketplace. (Ex. 1006 at 9-10: "without money clip," "with traditional money clip," "with spring-loaded money clip;" Ex. 1007: "Certain embodiments of the invention include an exterior clip….")

188. Moreover, a POSITA would have had good reason to incorporate the teachings of Beckley into Kane, as discussed above, with a reasonable expectation of success to advance the maintenance operations promoted by Kane. For example, Kane discloses turning a wallet "into a 'system' that can be completely disassembled by the user to replace the elastic and exchange outer plates for greater personalization." (Ex. 1006 at 5.) Utilizing one or more barbs ("hook") extending at an angle to the tang of the money clip ("auxiliary feature"), as disclosed by Beckley, facilitates removable attachment of the money clip ("auxiliary feature")

and advances the disassembly and personalization of the wallets, as suggested by Kane. (Ex. 1006 at 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences.")

189. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 1.

i. "the hook engaging an undercut of the recess to prevent inadvertent dislodgement of the auxiliary feature from the recess,"

190. In my opinion, the Kane-Beckley combination discloses this limitation.

191. Beckley discloses that the barbs **13** ("hook") engage a set of cavities **14** in the depression **15** ("recess") of the base **2**. (*Id*. at ¶ [0038]: "The clip **3** is assembled to the base **2** by inserting the clip **3** into a depression **15**. It is held in place by a pair of barbs seen at **13** mated into a set of cavities **14** on the base **2**.")

192. A POSITA reading Beckley would have understood one or more of the cavities **14** to constitute the claimed "undercut." For example, each cavity **14** defines a cut away portion from the bottom sidewall of the depression **15** ("recess"). (*Id*. at ¶¶ [0038]-[0039], and FIG. 1.) Additionally, the cavities **14** constitute one or more underside recesses that is either cut or molded into the depression **15** ("recess") to define a lip or protuberance. (*Id*. at ¶¶ [0038]-[0039], and FIG. 1.)

193. Further, a POSITA, reading Beckley, would understand that the barbs **13** ("hook") are mating ("engaging") with the cavities **14** ("undercut") in order to

prevent the clip **3** ("auxiliary feature") from inadvertently dislodging from the depression **15** ("recess") at least because the clip **3** would be free to dislodge from the depression **15** absent the barbs **13** and cavities **14**.

194. A POSITA would have been motivated to use a barb ("hook") and cavity ("undercut") engagement to prevent inadvertent dislodgement of a money clip ("auxiliary feature"), like that disclosed by Beckley, on a compact wallet, like that disclosed by Kane, because Kane and Beckley are in the same technical field, address similar problems, utilize similar devices, and disclose methods that when combined function in the same manner as each does separately to yield predictable results, as set forth in Section IX.A.1.e; which is incorporated here. (Ex. 1006 at 2-5 and 8-9; Ex. 1007 at ¶¶ [0002], [0004], [0008], [0010], [0034], [0038]-[0039], and FIG. 1.). In doing so, the POSITA would apply a known technique to a known device ready for improvement to yield predictable results.

195. Such a POSITA would have been motivated to use a barb ("hook") and cavity ("undercut") engagement to prevent inadvertent dislodgement of a money clip ("auxiliary feature"), like that disclosed by Beckley, on a compact wallet, like that disclosed by Kane, to allow a consumer to remove the money clip ("auxiliary feature") when not needed, in accordance with the minimalist preferences inherent to the compact wallet marketplace. (Ex. 1006 at 9-10: "without money clip," "with

traditional money clip," "with spring-loaded money clip;" Ex. 1007: "Certain embodiments of the invention include an exterior clip….")

196. Moreover, a POSITA would have had good reason to incorporate the teachings of Beckley into Kane, as discussed above, with a reasonable expectation of success to advance the maintenance operations promoted by Kane. For example, Kane discloses turning a wallet "into a 'system' that can be completely disassembled by the user to replace the elastic and exchange outer plates for greater personalization." (Ex. 1006 at 5.) Rendering the money clip ("auxiliary feature") removable by a barb ("hook") and cavity ("undercut") engagement, as disclosed by Beckley, advances the disassembly and personalization of the wallets, as suggested by Kane. (Ex. 1006 at 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences.")

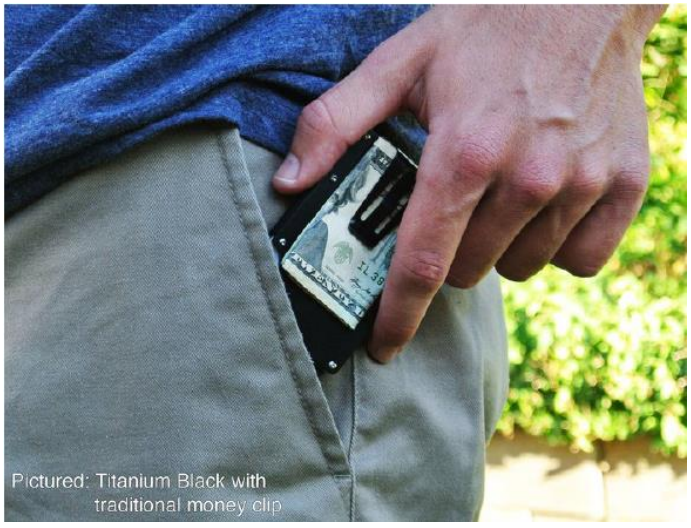
197. The technique of configuring compact wallets with an attached money clip ("auxiliary feature") that is removable via engagement of one or more barbs ("hook") with one or more cavities ("undercut") in a depression ("recess") was within the realm of ordinary capabilities of a POSITA based upon the teachings by at least Beckley. (Ex. 1007 at ¶¶ [0038]-[0039], FIG. 1.) Further, a POSITA would have been capable of applying this known method of configuring the compact wallet of Kane to yield predictable results.

198. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 1.

j. "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."

199. In my opinion, Kane discloses this limitation.

200. Kane discloses that card-like contents can be carried between the interior plate-outer faceplate pairs ("rigid plates") with minimal silhouette. (Ex. 1006 at 3: "Core design: Low profile to easily fit in your front pocket;" *Id*. at 2: "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.") For example, Kane discloses the following photograph.



(Ex. 1006 at 4.)

201. Additionally, Kane discloses that the wallet can carry the card-like contents while allowing for expandable capacity and ready access to individual contents. (*Id*.: "The interior plates have been tapered at the edge to allow easier access to the middle cards;" *Id*.: "Expandable track that can accommodate a various number of cards;" *Id*. at 5: "The Integrated Elastic Track can expand to hold up to 12 cards and then immediately contract to hold a single card securely.")

202. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 1.

2. Claim 2

a. "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,"

203. In my opinion, Kane discloses this limitation.

204. As set forth above, the Kane-Beckley combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

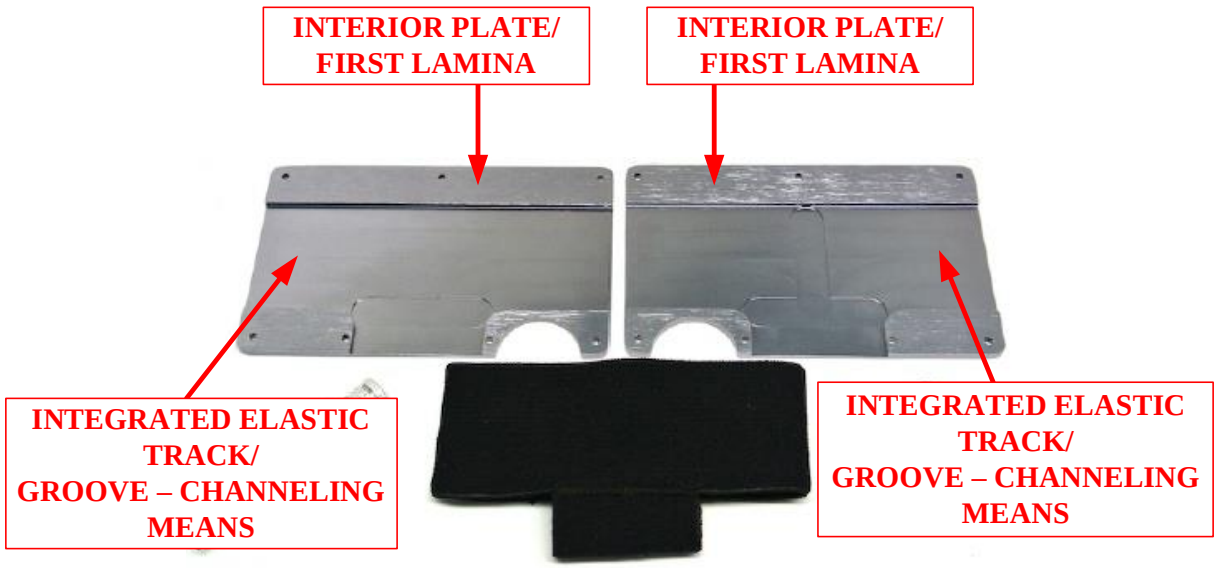
205. As discussed in Section IX.A.1.d, a POSITA, reading Kane, would have understood the integrated elastic track to constitute the claimed "channeling means." The discussion of Claim 1 presented in Section IX.A.1.d is incorporated herein by reference.

206. Further, Kane discloses that the integrated elastic track ("channeling means") is a longitudinal groove that extends along the entire length of each of the

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interior plates ("first lamina"), where each interior plate-outer faceplate pair ("rigid plate") is a laminate construction composed of an outer faceplate secured to an interior plate ("first lamina"). (Ex. 1006 at 5 and 7.)

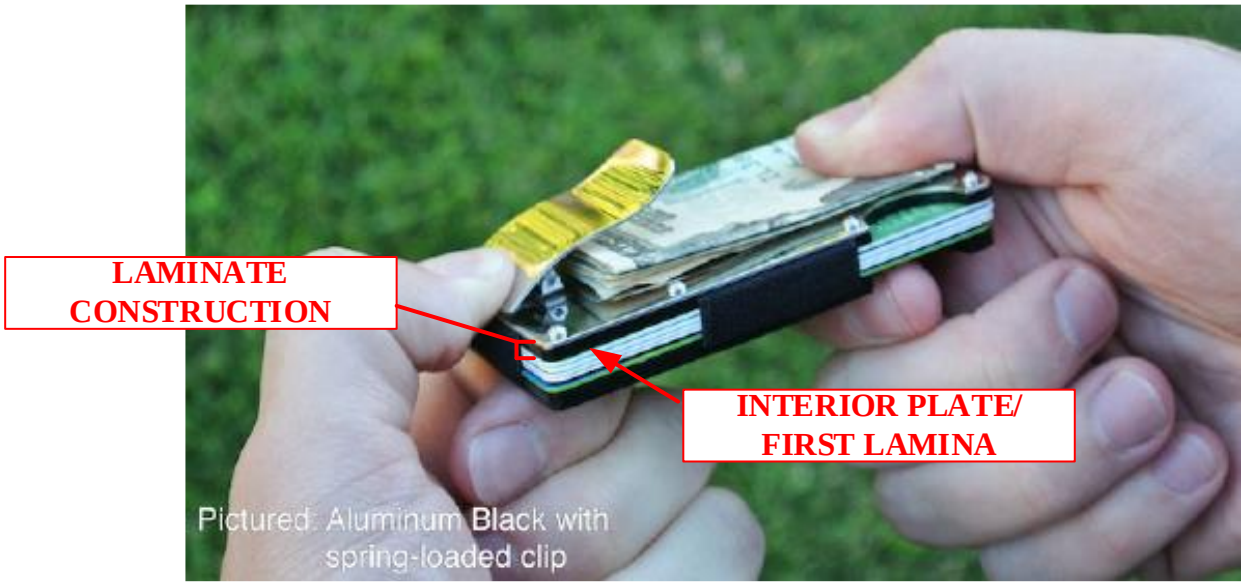
207. A POSITA, reading Kane, would have understood the interior plate to constitute the claimed "first lamina." For example, Kane discloses the following photograph of the integrated elastic track ("channeling means") embodied as a longitudinal groove in the interior plates ("first lamina").



(*Id.*at 5 (*annotated*).)

208. Further, Kane discloses a laminate construction of rigid plates composed of an aluminum interior plate ("first lamina" of the laminate construction) and an outer faceplate, where the longitudinal groove is in the aluminum interior plate ("first lamina"). (*Id*. at 4: "Interchangeable faceplates (swap materials and

money clips); *Id*. at 5: "The track runs along two hollow interior plates machined from anodized aircraft grade aluminum;" *Id*. at 6: "You can then choose between Titanium, Aluminum, or Carbon Fiber for the outer faceplates;" *Id*. at 7: "Seven hex screws machine from scratch secure the inner and outer plates allowing for replaceable elastic and interchangeable faceplates.") For example, Kane discloses the following photograph that depicts the laminate construction.



(*Id*. at 4 (*annotated*).)

209. In my opinion, a POSITA, reading Kane, would have understood the integrated elastic track along with the combination of interior plates secured to outer faceplates, to be identical, or at least equivalent to, the longitudinal groove **21** and laminate construction (*i.e.*, the first lamina **22** and second lamina **23**) depicted in FIGS. 7-9 of the '808 Patent.

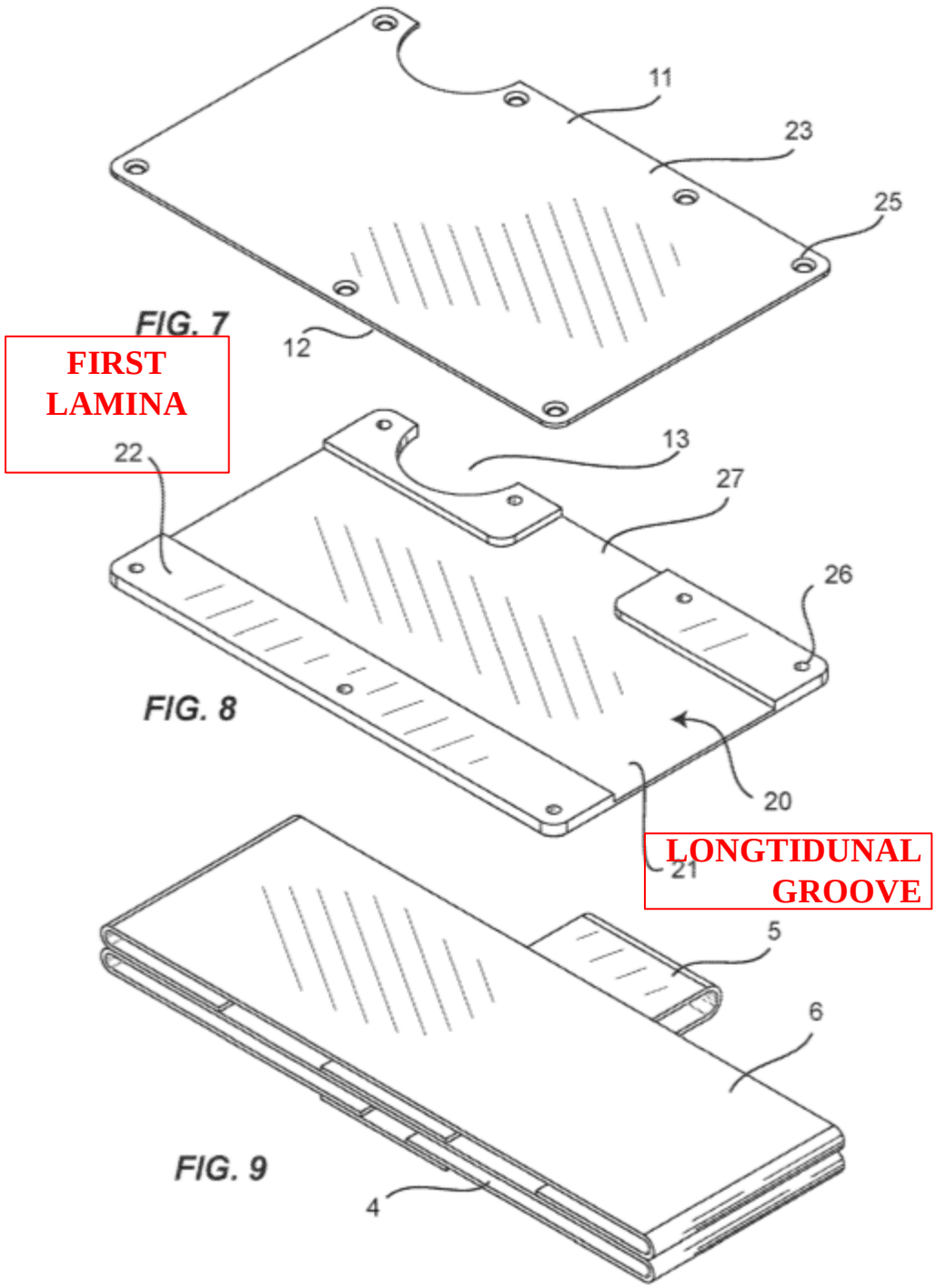


FIG. 7

FIG. 8

FIG. 9

(Ex. 1001, FIGS. 7-9 (*annotated*).)

210. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 2.

b. "the groove slidingly receiving one part of the at least one encircling elastic band."

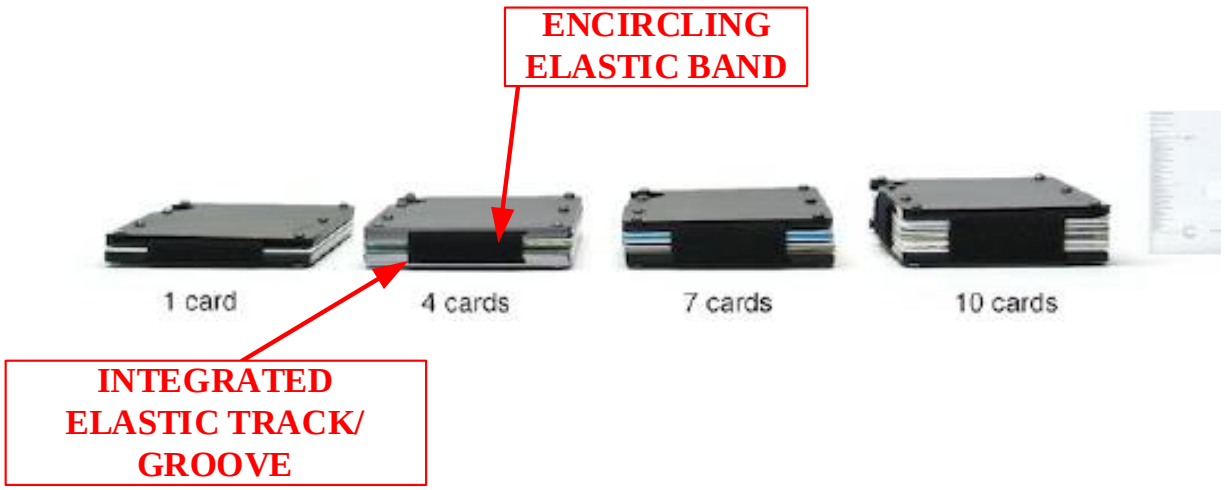
211. In my opinion, Kane discloses this limitation.

212. As set forth above, the Kane-Beckley combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

213. Kane discloses that the card-like contents slide smoothly against the interior plates. (Ex. 1006 at 5; 8.) A POSITA, reading Kane, would have understood the encircling elastic band to likewise slide smoothly against the integrated elastic track ("groove") formed in the interior plates ("first lamina"). For example, a POSITA would have expected the elastic band to slide against the machined aluminum material during expansion/contraction of the elastic.

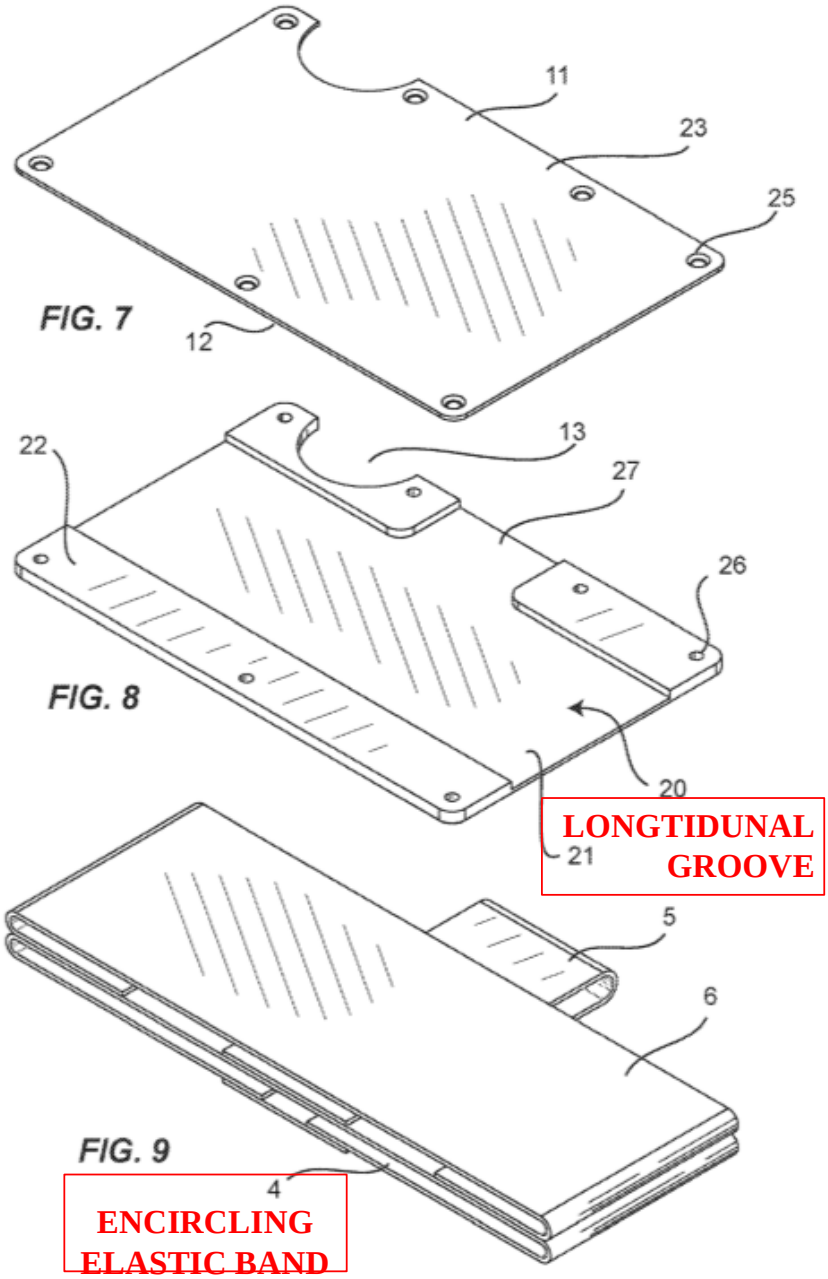
214. Additionally, Kane discloses the following photograph showing the encircling elastic band being received within the integrated elastic track ("channeling means," embodied as a "groove"). A POSITA viewing the following photograph would have understood the elastic band to be stretching/contracting as more card-like contents are added/removed to/from the wallet, and that the stretching/contracting would entail the elastic band sliding (*e.g.*, longitudinally) within integrated elastic track ("groove").

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(*Id.* at 5 (*annotated*).)

215. In my opinion, a POSITA, reading Kane, would have understood the integrated elastic track to slidingly receive the encircling elastic band, in an identical, or at least equivalent, manner to the encircling elastic band **4** and longitudinal groove **21** depicted in FIGS. 7-9 of the '808 Patent.



(Ex. 1001, FIGS. 7-9 (*annotated*).)

216. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 2.

3. Claim 3

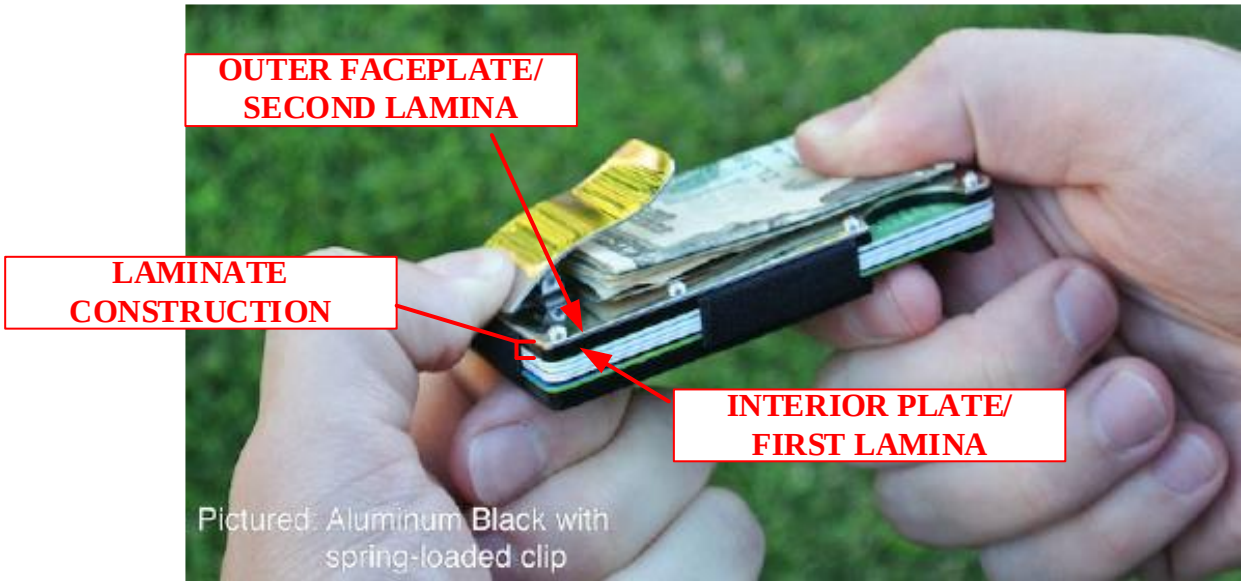
a. "The compact wallet of claim 2, wherein a second lamina of the laminate constructions of each rigid plate is removably attached to the first lamina to hold the at least one elastic band in capture and provide a smooth surface for glide purposes."

217. In my opinion, Kane discloses this limitation.

218. As set forth above, the Kane-Beckley combination discloses each and every limitation of Claim 2, and said discussion is incorporated herein by reference.

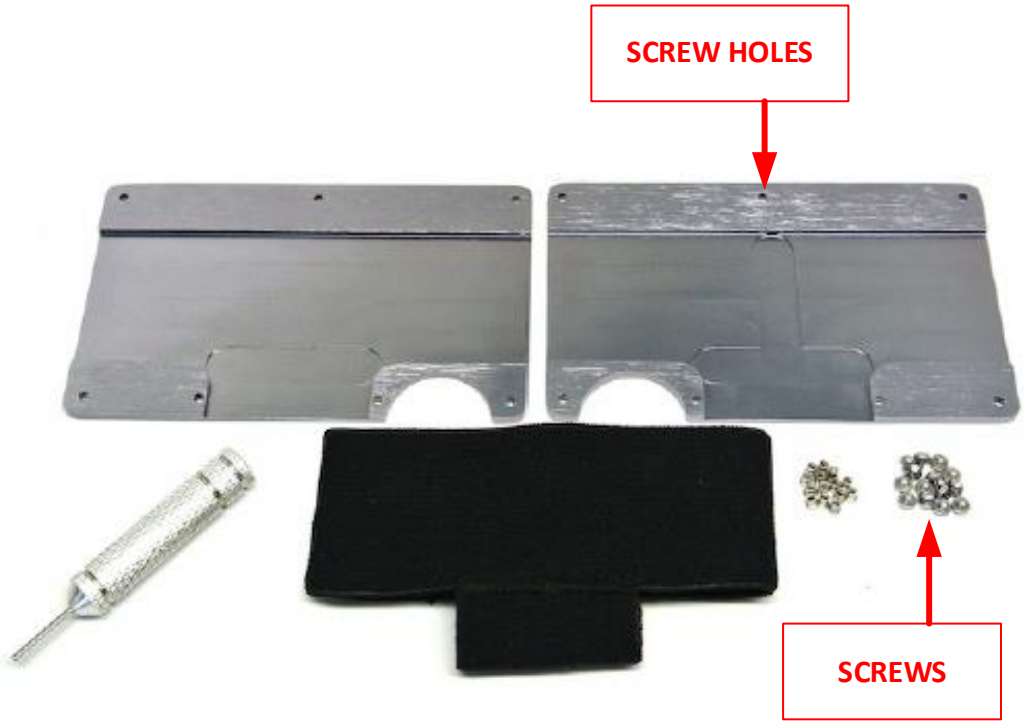
219. As discussed above in Section IX.A.2.a, a POSITA reading Kane would have understood one or more of the interior plates to be the claimed "first lamina." The discussion of Claim 2 presented in Section IX.A.2.a is incorporated herein by reference.

220. Kane discloses a laminate construction composed of an aluminum interior plate ("first lamina") and an outer faceplate ("second lamina"). (Ex. 1006 at 7-8.) A POSITA, reading Kane, would have understood the outer faceplate to constitute the claimed "second lamina" of the laminate construction. For example, Kane discloses the following photograph that shows the outer faceplate ("second lamina") and the laminate construction of the interior plate-outer faceplate pairs ("rigid plates").



(*Id*. at 4 (*annotated*).)

221. Further, Kane discloses that each outer faceplate ("second lamina") is removably attached to an interior plate ("first lamina") via screws. (*Id*. at 7: "Seven hex screws machine from scratch secure the inner and outer plates allowing for replaceable elastic and interchangeable faceplates.") For example, Kane discloses the following photograph that shows the screws that secure the outer faceplate ("second lamina") to the interior plate ("first lamina").



(*Id*. at 5 (*annotated*).)

222. Moreover, Kane discloses multiple photographs, such as the photo portion shown below (magnified and annotated to delineate the first lamina, second lamina, and elastic band), showing the outer faceplate ("second lamina") positioned over one or more portions of the encircling elastic band to hold the elastic band in a captured position within the integrated elastic track ("groove").

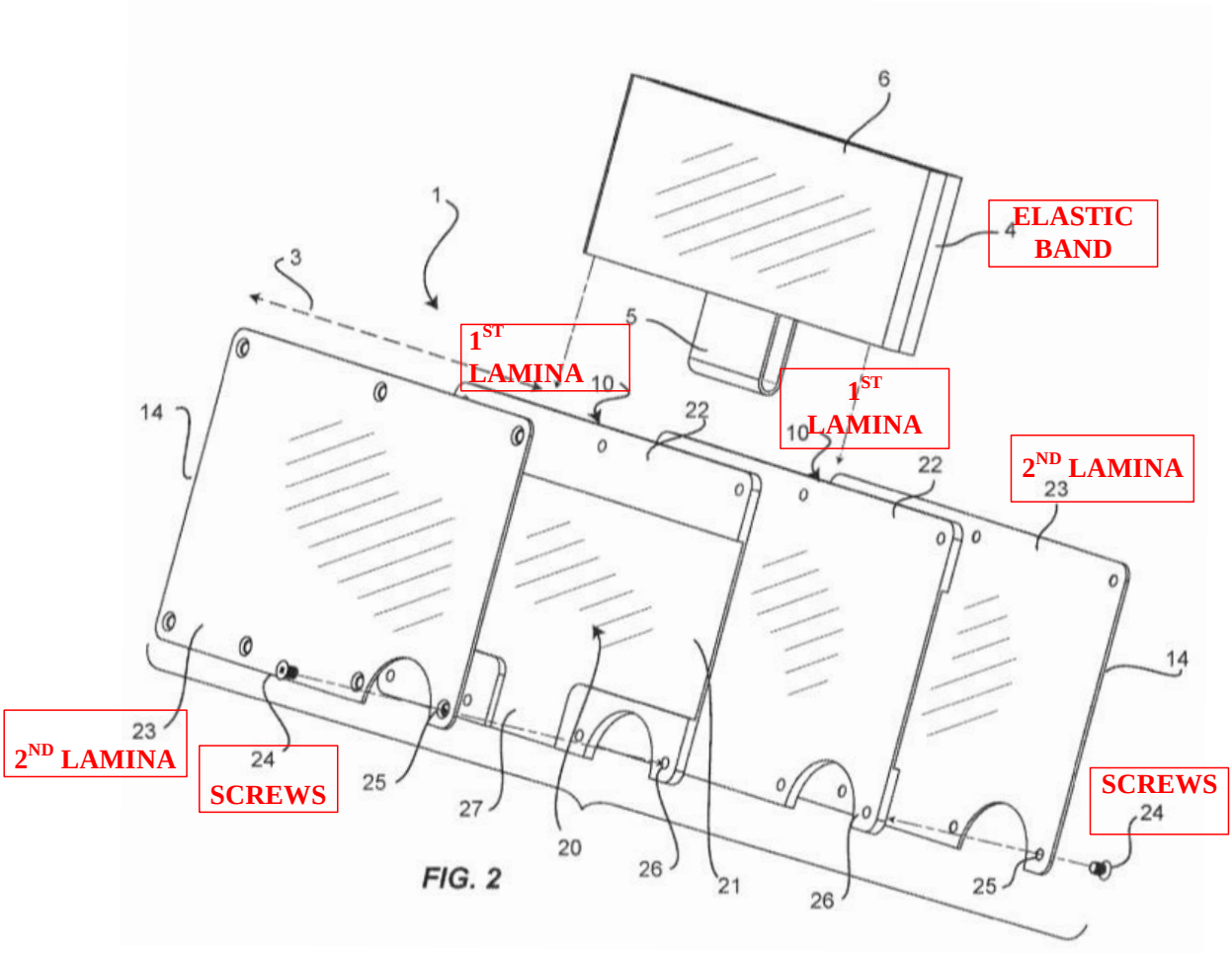
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(*Id*. at 7 (*annotated*).)

223. Having reviewed Kane, a POSITA, in my opinion, would have understood the outer faceplate ("second lamina") to provide a smooth surface against which the elastic band could glide. As discussed above in Section IX.A.2.b, a POSITA would have understood the elastic band to readily slide against the aluminum material of the interior plate (the "first lamina") during expansion/contraction. (*Id.* at 5.) Likewise, a POSITA, reading Kane, would have reasonably expected an aluminum outer faceplate ("second lamina") to provide a smooth surface for gliding at least because it is reasonable to presume that plates of the same materials (*e.g.*, aluminum), applied to similar functions (*e.g.*, to capture the elastic band), would behave alike. (*Id*. at 6: "You can then choose between Titanium, Aluminum, or Carbon Fiber for the outer faceplates.")

224. In my opinion, a POSITA, reading Kane, would have understood the interior plates in combination with the outer faceplates (collectively, the "laminate construction" of the "rigid plate") to be configured to hold the elastic band in capture and provide a smooth surface for glide purposes in an identical, or at least equivalent, manner as the laminate construction depicted in FIG. 2 of the '808 Patent.



(Ex. 1001, FIG. 2 (*annotated*).)

225. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 3.

4. Claim 4

a. "The compact wallet of claim 3, wherein the second lamina is attached to the first lamina by screws."

226. In my opinion, Kane discloses this limitation.

227. As set forth above, the Kane-Beckley combination discloses each and every limitation of Claim 3, and said discussion is incorporated herein by reference.

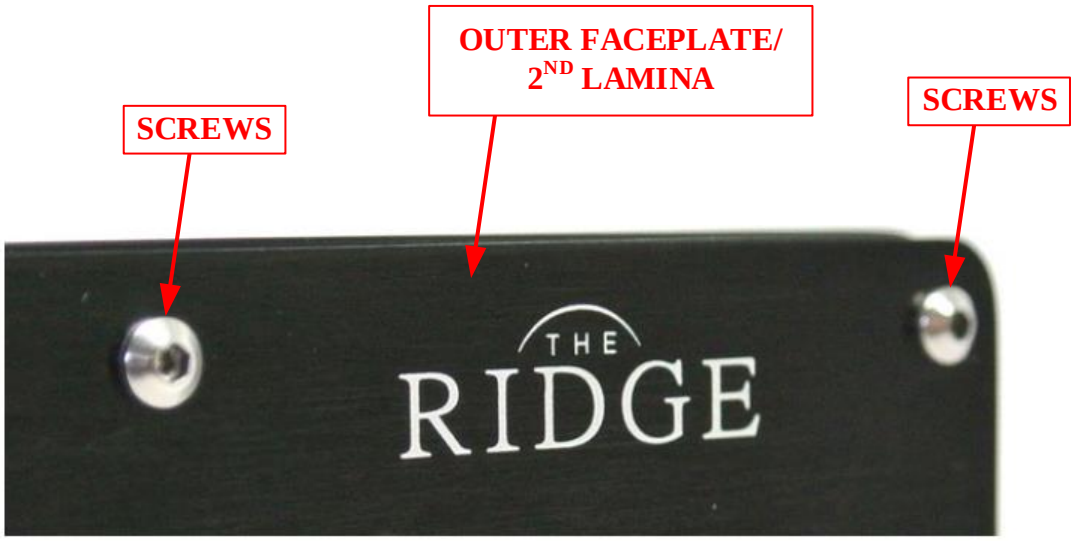
228. As discussed above in Section IX.A.2.a, a POSITA, reading Kane, would have understood one or more of the interior plates to be the claimed "first lamina." The discussion of Claim 2 presented in Section IX.A.2.a is incorporated herein by reference.

229. As discussed above in Section IX.A.3.b, a POSITA, reading Kane, would have understood one or more of the outer faceplates to be the claimed "second lamina." The discussion of Claim 3 presented in Section IX.A.3.b is incorporated herein by reference.

230. Further, Kane discloses that each rigid plate is composed of an interior plate ("first lamina") secured to an outer faceplate ("second lamina") by screws. (*Id*. at 7: "Seven hex screws machine from scratch secure the inner and outer plates allowing for replaceable elastic and interchangeable faceplates;" *Id*. at 3: "re-machined with threads for seven hex screws on either side that turn the wallet into a

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'system'…; *Id*. at 4: "Custom hex screws instead of rivets.") For example, Kane discloses the following photograph that shows the screws that attach the outer faceplate ("second lamina") to the interior plate ("first lamina").



(*Id*. at 7 (*annotated*).)

231. In my opinion, a POSITA, reading Kane, would have understood the outer faceplates ("second lamina") to be attached to the interior plates ("first lamina") via screws in an identical, or at least equivalent, manner as the laminate construction depicted in FIG. 2 of the '808 Patent.

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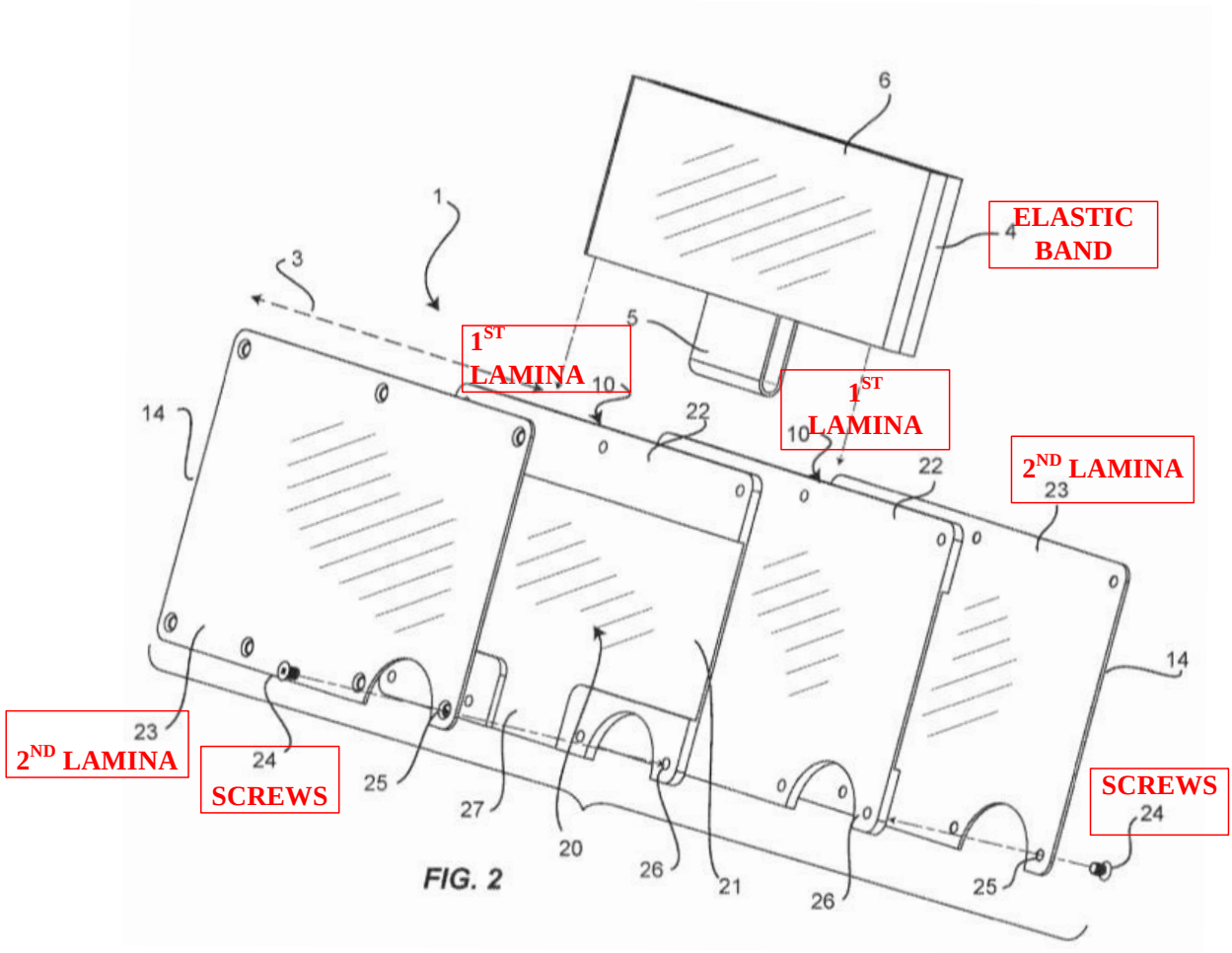


FIG. 2

(Ex. 1001, FIG. 2 (*annotated*).)

232. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 4.

5. Claim 5

a. "The compact wallet of claim 3, wherein the second lamina is attached to the first lamina by pressure sensitive adhesive means."

233. In my opinion, a POSITA, reading Kane, would have found it obvious to use pressure sensitive adhesive to attach the outer faceplate (the "second lamina") to the interior plate (the "first lamina").

234. As set forth above, the Kane-Beckley combination discloses each and every limitation of Claim 3, and said discussion is incorporated herein by reference.

235. As discussed above in Section IX.A.2.a, a POSITA, reading Kane, would have understood one or more of the interior plates to be the claimed "first lamina." The discussion of Claim 2 presented in Section IX.A.2.a. is incorporated herein by reference.

236. As discussed above in Section IX.A.3.b, a POSITA, reading Kane, would have understood one or more of the outer faceplates to be the claimed "second lamina." The discussion of Claim 3 presented in Section IX.A.3.b is incorporated herein by reference.

237. At the Critical date and before, pressure sensitive adhesive was a well-known alternative to screws for fixing materials together. Using pressure sensitive adhesive to attach the lamina together would amount to a simple substitution of one

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known element (pressure sensitive adhesive) for another (screws) to obtain a predicable result (attaching the outer faceplate to the interior plate).

238. Accordingly, in my opinion, the Kane-Beckley combination in view of the knowledge of a POSITA discloses this limitation of Claim 5.

6. Claim 6

a. "The compact wallet of claim 1, wherein each rigid plate is comprised of metal for RFID protection."

239. In my opinion, Kane discloses this limitation.

240. As set forth above, the Kane-Beckley combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

241. As discussed above in Section IX.A.1.b., a POSITA, reading Kane, would have understood the two interior plate-outer faceplate pairs to be "the at least two rigid plates." The discussion of Claim 1 presented in Section IX.A.1.b is incorporated herein by reference.

242. Further, Kane discloses that the interior plates of the interior plate-outer faceplate pairs ("rigid plates") are machined from aluminum, a metal. (Ex. 1006 at 5: "The track runs along two hollow interior plates machined from anodized aircraft grade aluminum.") Further, Kane discloses that the outer faceplates of the interior plate-outer faceplate pairs ("rigid plates") can be composed of aluminum or titanium, metals. (Ex. 1006 at 6: "choose between Titanium, Aluminum, or Carbon Fiber for the outer faceplates," 7.) For example, Kane discloses the following images.

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(*Id*. at 7.)

243. In my opinion, a POSITA would understand "RFID," as used in Claim 6, to mean radio frequency identification. (Ex. 1001 5:38-39.) Moreover, Kane discloses that the aluminum of the interior plate-outer faceplate pairs ("rigid plates") provides RFID protection. (*Id*. at 8: "The Ridge's aluminum interior plates block RFID, keeping your information safe.")

244. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 6.

7. Claim 7

a. "The compact wallet of claim 1, wherein each rigid plate is metalized for RFID protection."

245. In my opinion, Kane discloses this limitation.

246. As set forth above, the Kane-Beckley combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

247. As discussed above in Section IX.A.1.b., a POSITA, reading Kane, would have understood the interior plate-outer faceplate pairs to be "the at least two rigid plates." The discussion of Claim 1 presented in Section IX.A.1.b is incorporated herein by reference.

248. Further, Kane discloses that the interior plates of the interior plate-outer faceplate pairs ("rigid plates") are machined from aluminum, a metal. (Ex. 1006 at 5: "The track runs along two hollow interior plates machined from anodized aircraft grade aluminum.") Moreover, Kane discloses that the outer faceplates of the interior plate-outer faceplate pairs ("rigid plates") can be composed of aluminum or titanium, metals. (Ex. 1006 at 6: "choose between Titanium, Aluminum, or Carbon Fiber for the outer faceplates," 7.) For example, Kane discloses the following images.



(*Id*. at 7.)

249. Additionally, a POSITA would be familiar with the process of metalizing non-metallic materials.

250. In my opinion, a POSITA would understand "RFID," as used in Claim 7, to mean radio frequency identification. (Ex. 1001 5:38-39.) Moreover, Kane discloses that the aluminum of the interior plate-outer faceplate pairs ("rigid plates") provides RFID protection. (*Id*. at 8: "The Ridge's aluminum interior plates block RFID, keeping your information safe.")

251. Accordingly, in my opinion, the Kane-Beckley combination in view of the knowledge of a POSITA discloses this limitation of Claim 7.

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8. Claim 8

a. "The compact wallet of claim 3, wherein at least one of the first or second lamina of each rigid plate is comprised of metal."

252. In my opinion, Kane discloses this limitation.

253. As set forth above, the Kane-Beckley combination discloses each and every limitation of Claim 3, and said discussion is incorporated herein by reference.

254. As discussed above in Section IX.A.2.a, a POSITA, reading Kane, would have understood one or more of the interior plates to be the claimed "first lamina." The discussion of Claim 2 presented in Section IX.A.2.a is incorporated herein by reference.

255. As discussed above in Section IX.A.3.b, a POSITA reading Kane would have understood one or more of the outer faceplates to be the claimed "second lamina." The discussion of Claim 3 presented in Section IX.A.3.b is incorporated herein by reference.

256. Further, Kane discloses that the interior plates ("first lamina") are machined from aluminum, a metal. (*Id*. at 5: "The track runs along two hollow interior plates machined from anodized aircraft grade aluminum;" *Id*. at 8: "The Ridge's aluminum interior plates block RFID, keeping your information safe.")

257. Likewise, Kane discloses that the outer faceplates ("second lamina") can be titanium (a metal), aluminum (a metal), or carbon fiber. (*Id*. at 6: "You can

then choose between Titanium, Aluminum, or Carbon Fiber for the outer faceplates.")

258. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 8.

9. Claim 9

a. "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,"

259. In my opinion, Kane discloses this limitation.

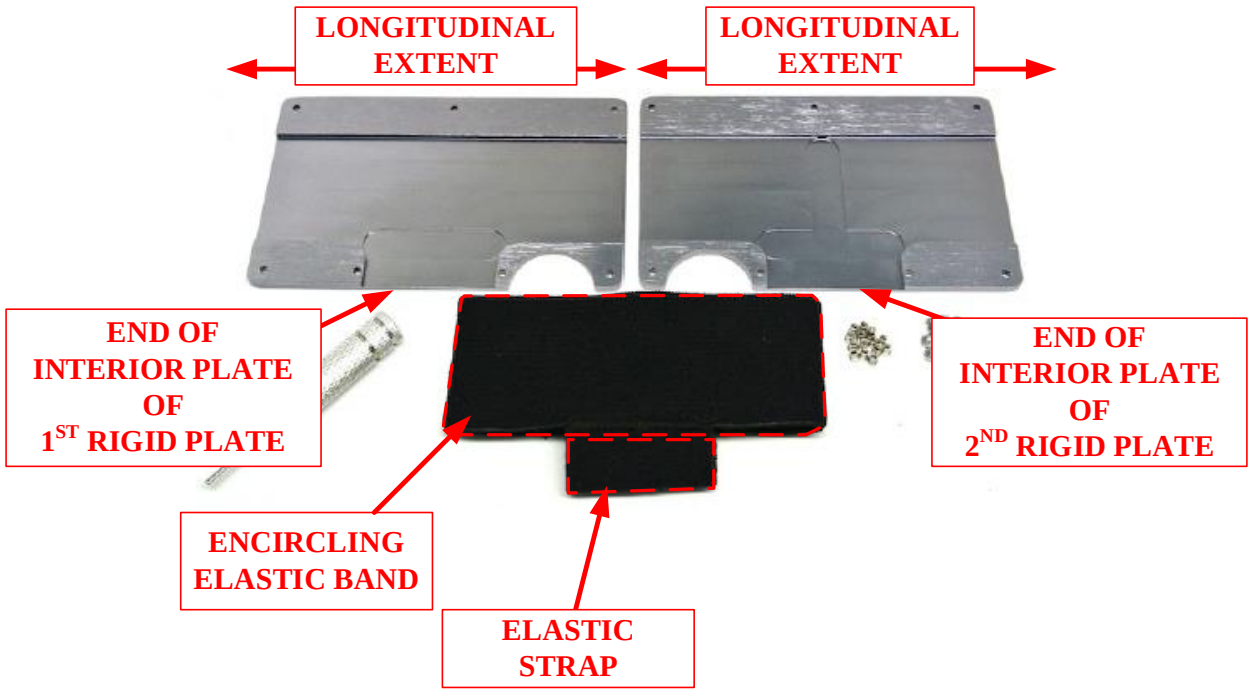
260. As set forth above, the Kane-Beckley combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

261. Kane discloses an elastic strap, in addition to the encircling elastic band, that is positioned over the sides ("ends") of the interior plate-outer faceplate pairs ("rigid plates") and transverse to the longitudinal extent thereof. (Ex. 1006 at 4-7: photographs thereof.) As discussed above in Section IX.A.1.b, a POSITA, reading Kane, would have understood the two interior plate-outer faceplate pairs to be the claimed "at least two rigid plates." The discussion of Claim 1 presented in Section IX.A.1.b is incorporated herein by reference.

262. For example, Kane discloses the following photographs that depict the encircling elastic strap, the first elastic strap, the ends of the interior plate-outer faceplate pairs ("rigid plates"), and the longitudinal extent thereof.



(*Id*. at 5 (*annotated*).)

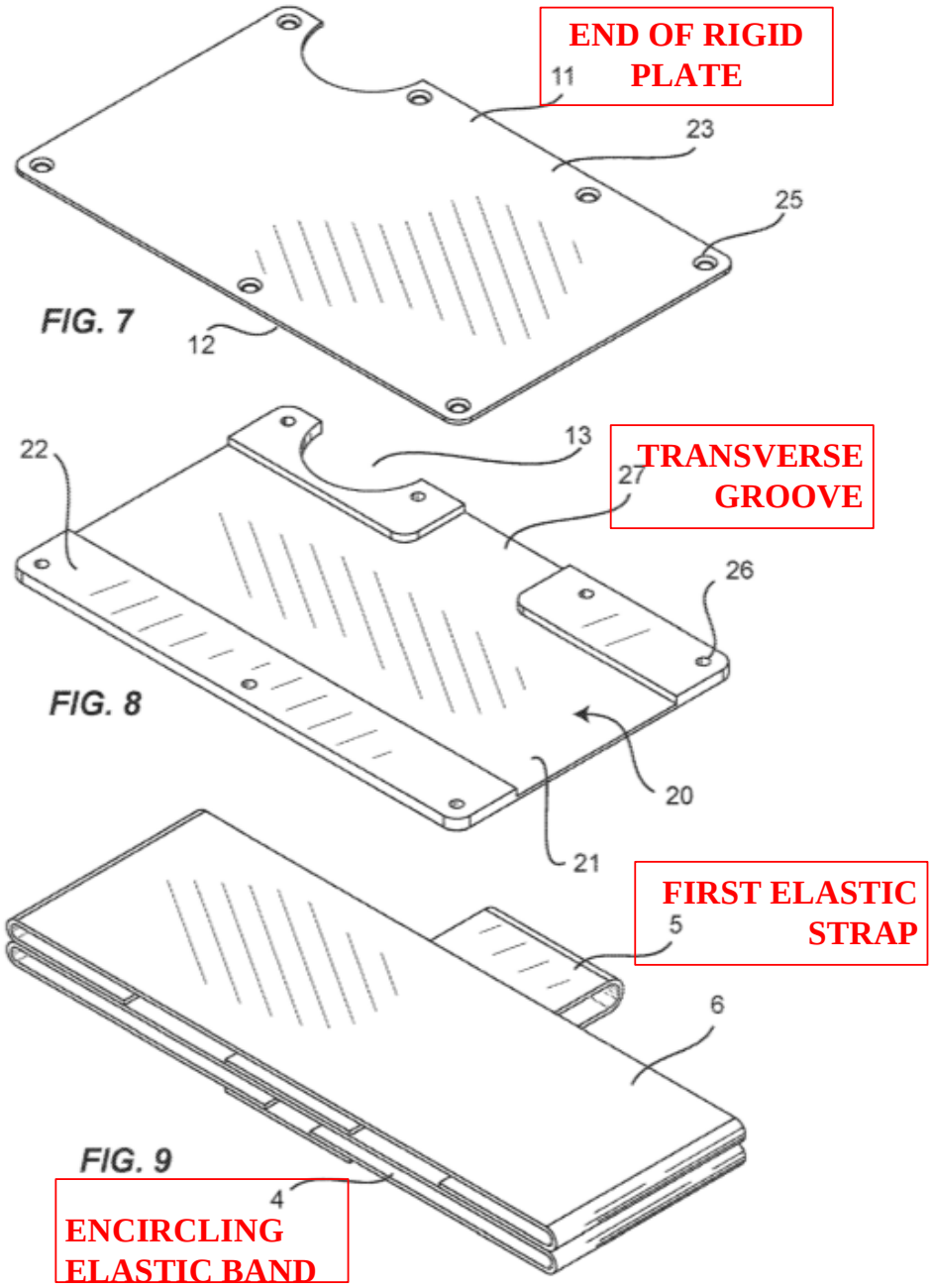


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(*Id*. (*annotated*))

263. In my opinion, a POSITA, reading Kane, would have understood the elastic strap to be positioned over the interior plates of the interior plate-outer faceplate pairs ("rigid plates") transverse to the longitudinal extent thereof in an identical, or at least equivalent, manner as the first elastic strap **5** depicted in FIGS. 7-9 of the '808 Patent; which depict the elastic band **4**, the first elastic strap **5**, the transverse groove **27** that receives the first elastic strap **5**, and the ends **11** of the rigid plates **10**.

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(Ex. 1001, FIGS. 7-9 (*annotated*).)

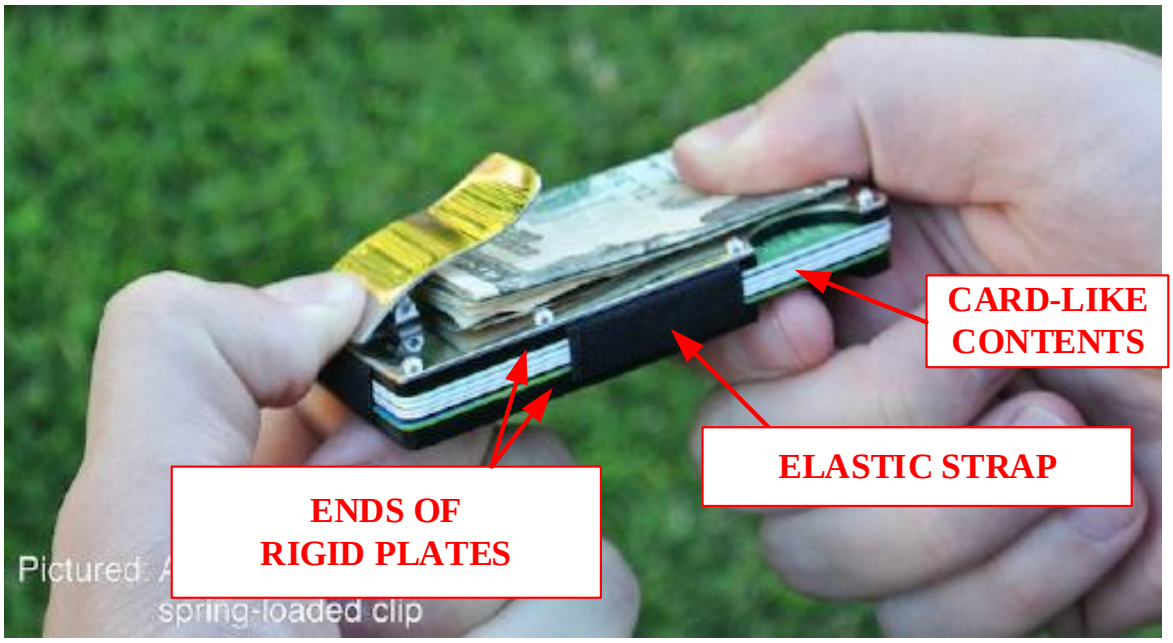
264. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 9.

b. "the positioning functioning to retain the card-like contents from that end."

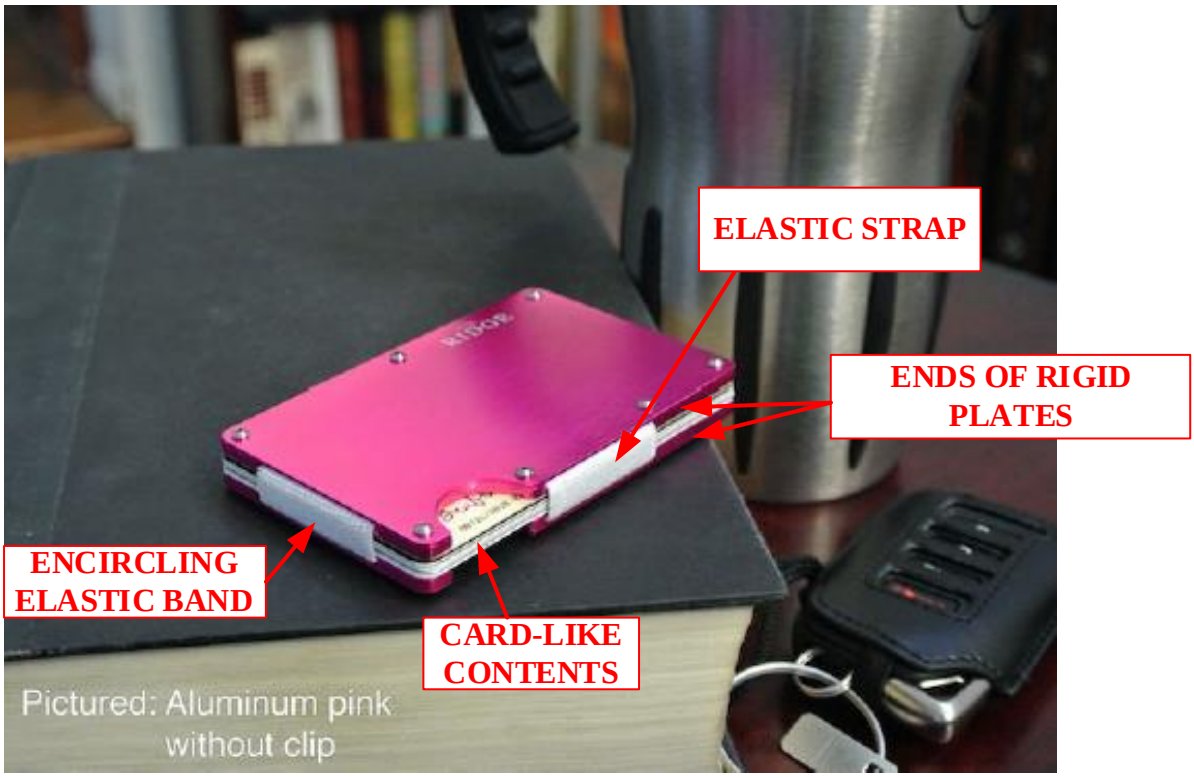
265. In my opinion, Kane discloses this limitation.

266. As set forth above, the Kane-Beckley combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

267. Kane disclose that the first elastic strap serves to retain the card-like contents from an end of the wallet, where the first elastic strap is located. (Ex. 1006 at 3: "Singular Construction that won't let cards slip out the bottom.") For example, Kane discloses the following photographs depicting the position of the elastic strap functioning to retain the card-like contents by preventing the card-like contents from exiting the wallet from the side ("end") of the interior plate-outer faceplate pairs ("rigid plates").



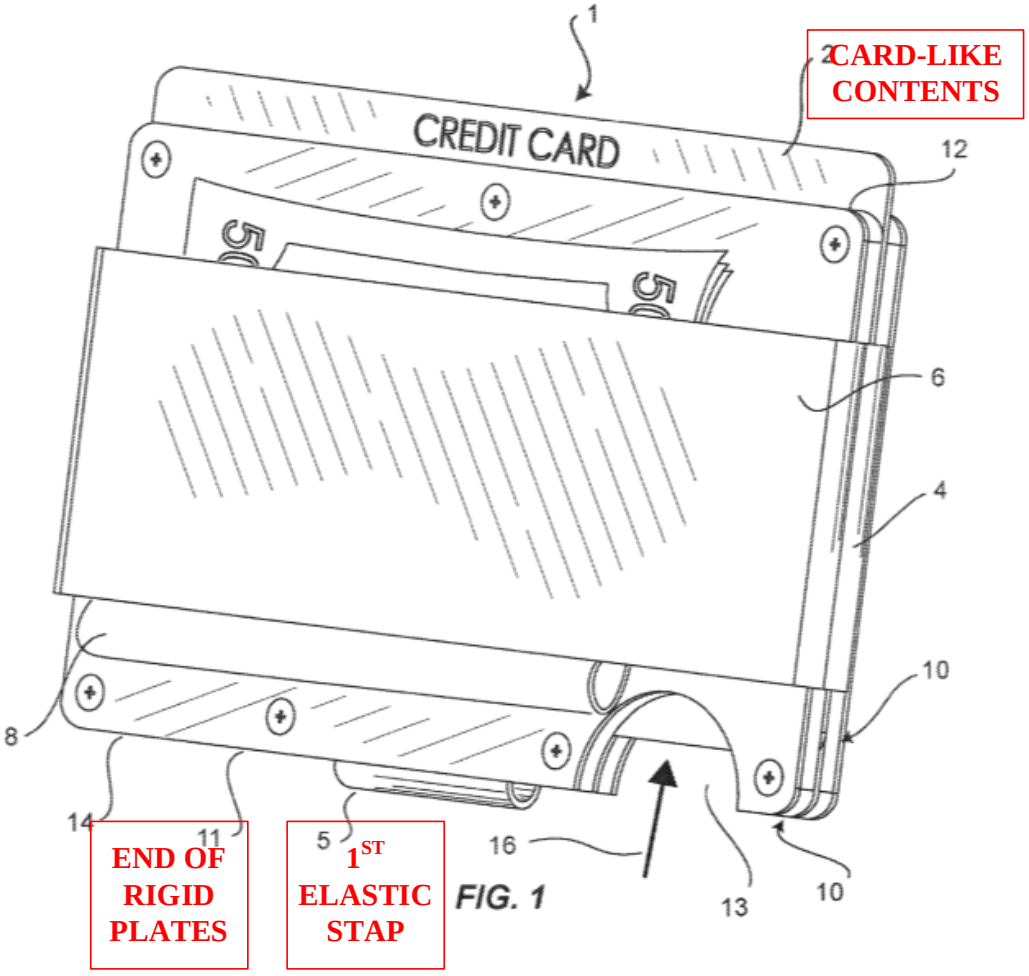
(Ex. 1006 at 4 (*annotated*).)



(*Id*. at 5 (*annotated*).)

268. In my opinion, a POSITA, in view of at least the photographs presented above, would have understood that the positioning of the elastic strap functions to retain the card-like contents from the end of the interior plate-outer faceplate pairs ("rigid plates") at which the elastic strap is located. For example, a POSITA, reading Kane, would have understood that the elastic strap inhibits the entry and/or removal of card-like contents from one end of the wallet.

269. In my opinion, a POSITA, reading Kane, would have understood the positioning of the elastic strap to function to retain the card-like contents in an identical, or at least equivalent, manner as the first elastic strap **5** depicted in FIG. 1 of the '808 Patent; which depicts the end **11** of the rigid plates **10**, the first elastic strap **5**, and the card-like contents **2**.



(Ex. 1001, FIG. 1 (*annotated*).)

270. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 9.

10. Claim 11

a. "The compact wallet of claim 1, wherein the card-like contents comprise one or more of a credit card, a driver's license, an ID card, a business card, an affiliation card, a currency bill, a loyalty card, a coupon, a receipt or a personal paper."

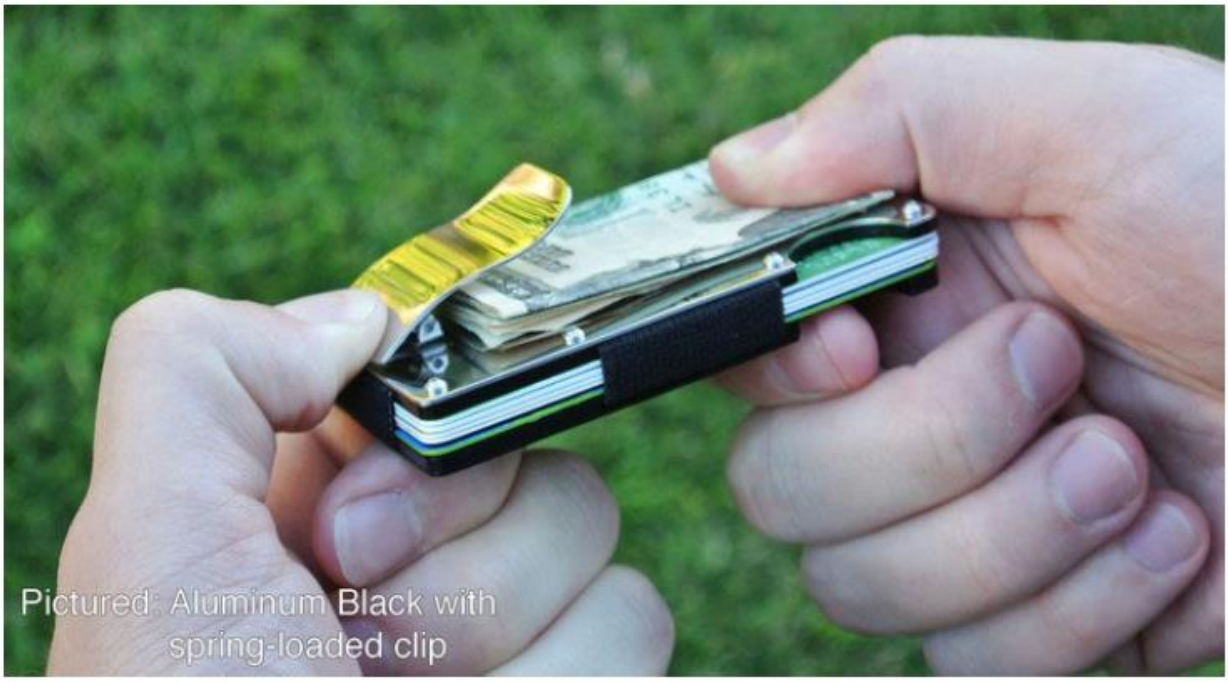
271. In my opinion, both Kane and Beckley each disclose this limitation.

272. As set forth above, the Kane-Beckley combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

273. Kane discloses that the aluminum interior plates provide RFID blocking to secure credit card information, thereby inherently disclosing that one or more of the card-like contents secured between the interior plate-outer faceplate pairs ("rigid plates") can be a credit card. (*Id*. at 8: "Radio Frequency Identification is becoming an increasingly common feature on credit cards that allows the user to wireless 'swipe' their card. However, the technology is inherently vulnerable as it lends itself to wireless identity theft. The Ridge's aluminum interior plates block RFID, keeping your information safe.")

274. In my opinion, a POSITA would have understood Kane's description of "cards" in the context of a wallet to include credit cards. Likewise, a POSITA, would have understood the stack of cards disclosed in the photographs of Kane, such as the

photograph below, to include one or more credit cards since it is well-known (at and/or before the Critical Date), and common place, to carry credit cards in one's wallet.



(*Id*. at 4.)

275. Beckley discloses a wallet that holds card-like contents, such as currency, credit cards, and identification cards. (Ex. 1007 at ¶ [0034]: "In an embodiment, the wallet **5** may be used for securing financial instruments, organizing and carrying currency, credit cards, identification cards (such as a driver's license) and any such items generally carried about one's person," and FIGS. 2A-2B, 4B, 5A-5B, and 6A-6B.)

276. To the extent it were found that Kane does not disclose credit cards as the card-like contents, a POSITA would have looked to Beckley for guidance on securing currency, credit cards, and/or identification cards, like that disclosed by Beckley, in a compact wallet, like that disclosed by Kane, because Beckley and Kane are in the same technical field, address similar problems, utilize similar devices, and disclose structural features that, when combine, function in the same manner as each does separately to yield predictable results.

277. Accordingly, in my opinion, Kane alone, Beckley alone, and/or the Kane-Beckley combination discloses this limitation of Claim 11.

11. Claim 12

a. "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,"

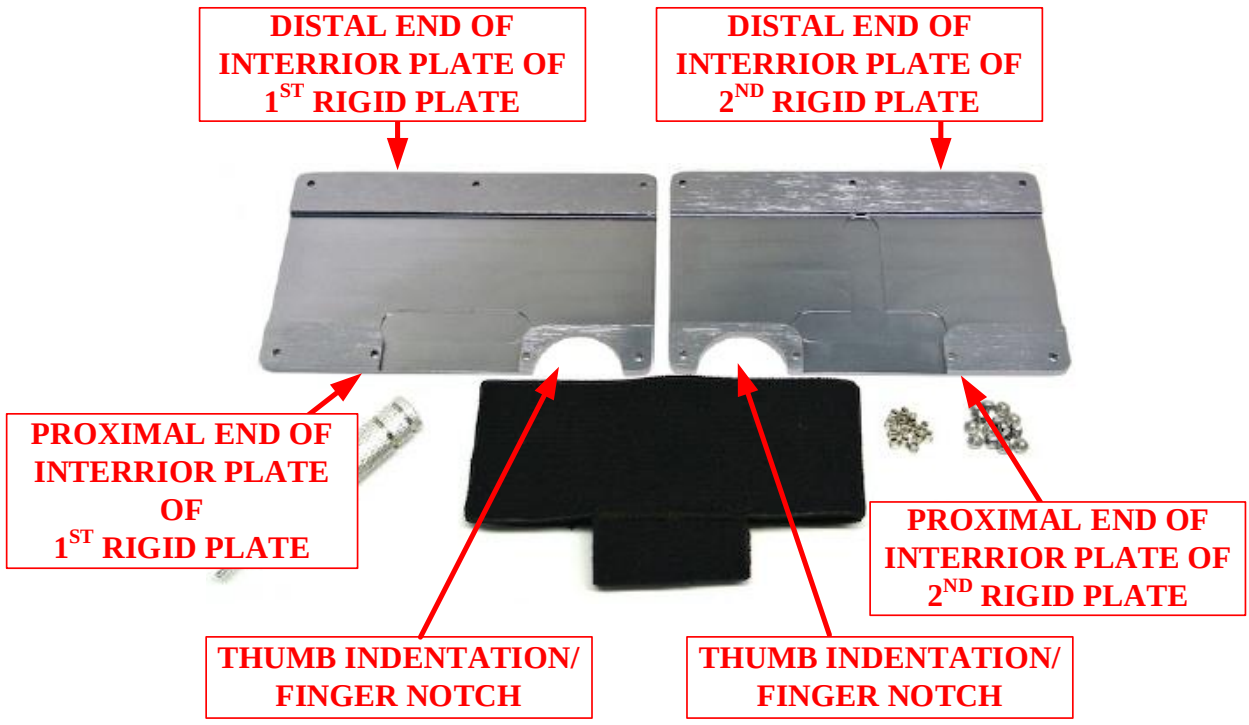
278. In my opinion, Kane discloses this limitation.

279. As set forth above, the Kane-Beckley combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

280. As discussed above in Section IX.A.1.b., a POSITA reading Kane would have understood the two interior plate-outer faceplate pairs to be "the at least two rigid plates," or at least a part thereof. The discussion of Claim 1 presented at Section IX.A.1.b is incorporated herein by reference.

281. Kane discloses "thumb indentations" through proximal ends of each of the interior plate-outer faceplate pairs ("rigid plates"). (*Id*. at 8.) In my opinion, a POSITA, reading Kane, would have understood the thumb indentations to constitute the claimed "finger notches." For example, a POSITA would have understood a notch to be a type of indentation, and that an indentation shaped to accommodate a thumb would readily accommodate a finger as well.

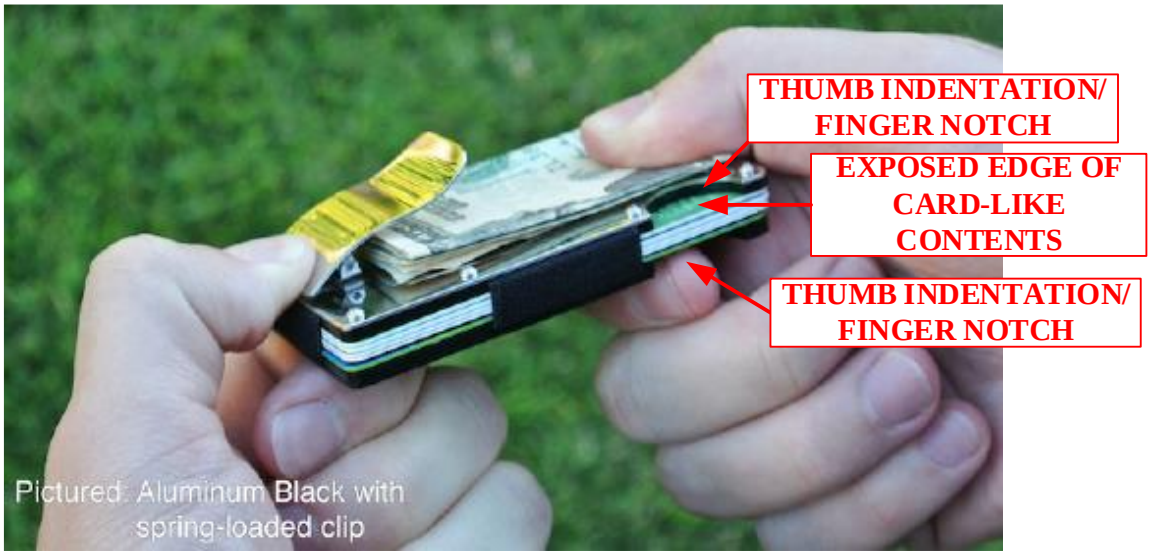
282. Further, the thumb indentations ("finger notches") of each interior plate-outer faceplate pairs ("rigid plate") are aligned such that the interior plate-outer faceplate pairs ("rigid plates") mirror each other when positioned side-by-side. For example, Kane discloses the below photograph showing the aligned thumb indentations ("finger notches") in the proximal ends of the interior plates.



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(*Id*. at 5.)

283. Additionally, Kane includes multiple photographs illustrating the thumb indentations ("finger notches") enabling an exposure of an edge of the card-like contents. For example, Kane includes the following photograph that depicts the aligned thumb indentation ("finger notches") and exposed edge of the card-like contents.



(Id. at 4 (*annotated*).)

284. Kane also discloses that the thumb indentations ("finger notches") enable the user to push the card-like contents through a distal end of the interior plate-outer faceplate pairs ("rigid plates") to an elevation that brings the card-like contents into view. (*Id*. at 8: "The Thumb indentation at the lower left of the wallet allows you to easily push your card up and select the correct one.")

285. In my opinion, a POSITA, reading Kane, would have understood that pushing edge of the card-like contents in the thumb indentations ("finger notches") would result in the card-like contents being elevated past the opposite end ("distal end") of the wallet; thereby bringing the card-like contents into view. For example, operation of the thumb indentations ("finger notches") would be apparent to a POSITA viewing at least the following photograph disclosed by Kane.



(*Id*. at 7 (*annotated*).)

286. In my opinion, a POSITA, reading Kane, would have understood the shape, positioning, and function of the thumb indentations to be identical, or at least

equivalent, to the finger notches **13** depicted in FIGS. 1 and 10 of the '808 Patent; which depicts the proximal ends **13** and distal ends **12** of the rigid plates **10**, the finger notches **13**, and the elevation of the card-like contents **2**.

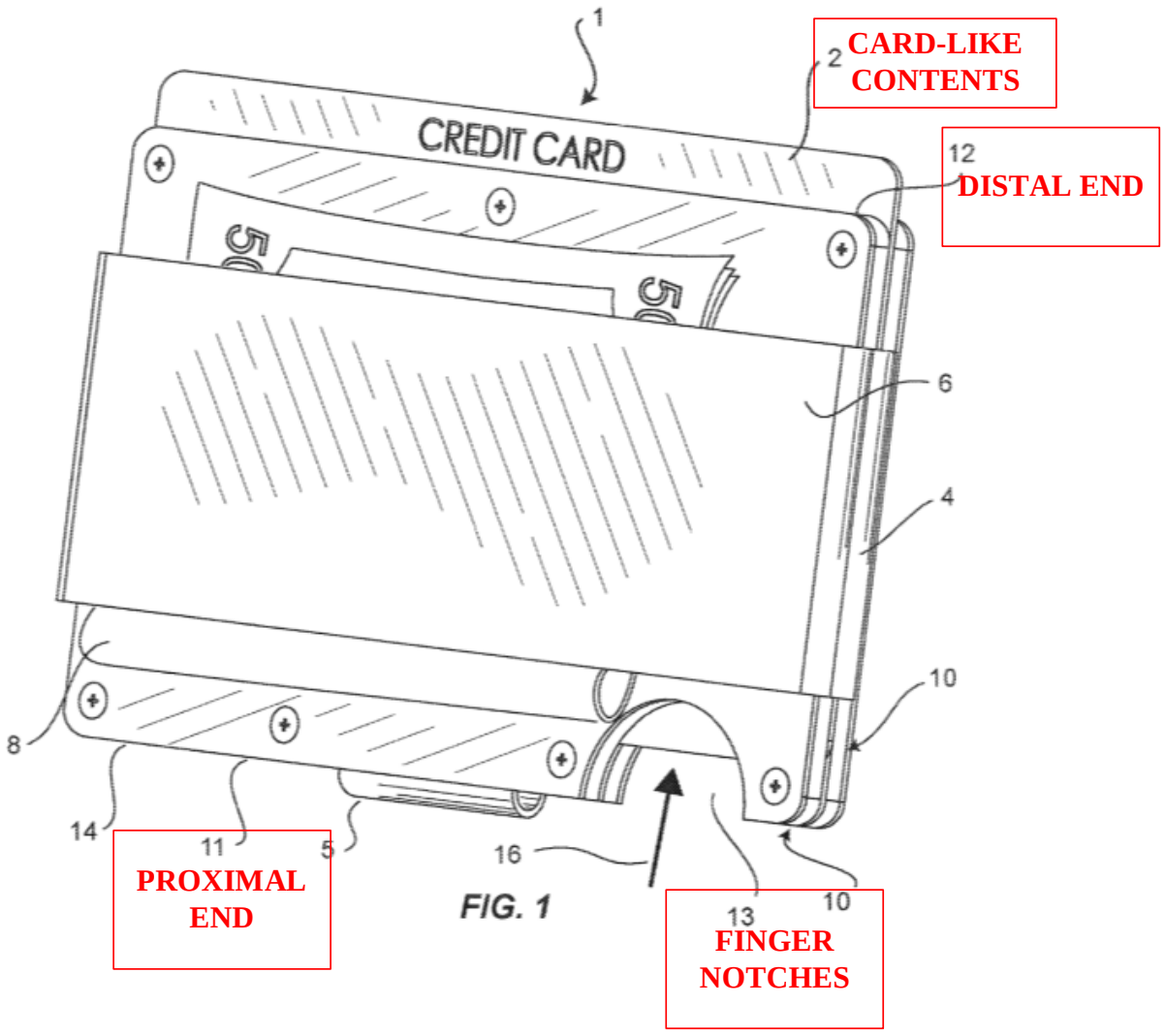


FIG. 1

(Ex. 1001, FIG. 1 (*annotated*).)

287. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 12.

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b. "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."

288. In my opinion, Kane discloses this limitation.

289. As set forth above, the Kane-Beckley combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

290. As discussed above in Section IX.A.12.a, Kane discloses the claimed exposed edge of the card-like contents and the claimed proximal and distal ends of the rigid plates. Thus, a POSITA, reading Kane, would reasonably presume that the Ridge 2.0 wallet functions in the claimed manner to fan the rigid plates and display the card-like contents. In other words, a POSITA would reasonably presume that wallets with identical structural features would perform identical functions. Here, each structural feature associated with the claimed fanning/display function (*i.e.*, the proximal and distal ends of the rigid plates and the position of the card-like contents between the rigid plates to provide a fulcrum) are identically disclosed by Kane.

291. For example, in my opinion, a POSITA, reading Kane, would have understood the proximal ends of the interior plates, the distal ends of the interior plates, and the edge of the card-like contents (*e.g.*, when elevated) to be identical, or at least equivalent, to the proximal ends **11** of the rigid plates **10**, the distal ends **12** of the rigid plates **10**, and the edge of the card-like contents **2** depicted in FIG. 10 of the '808 Patent, as shown below.

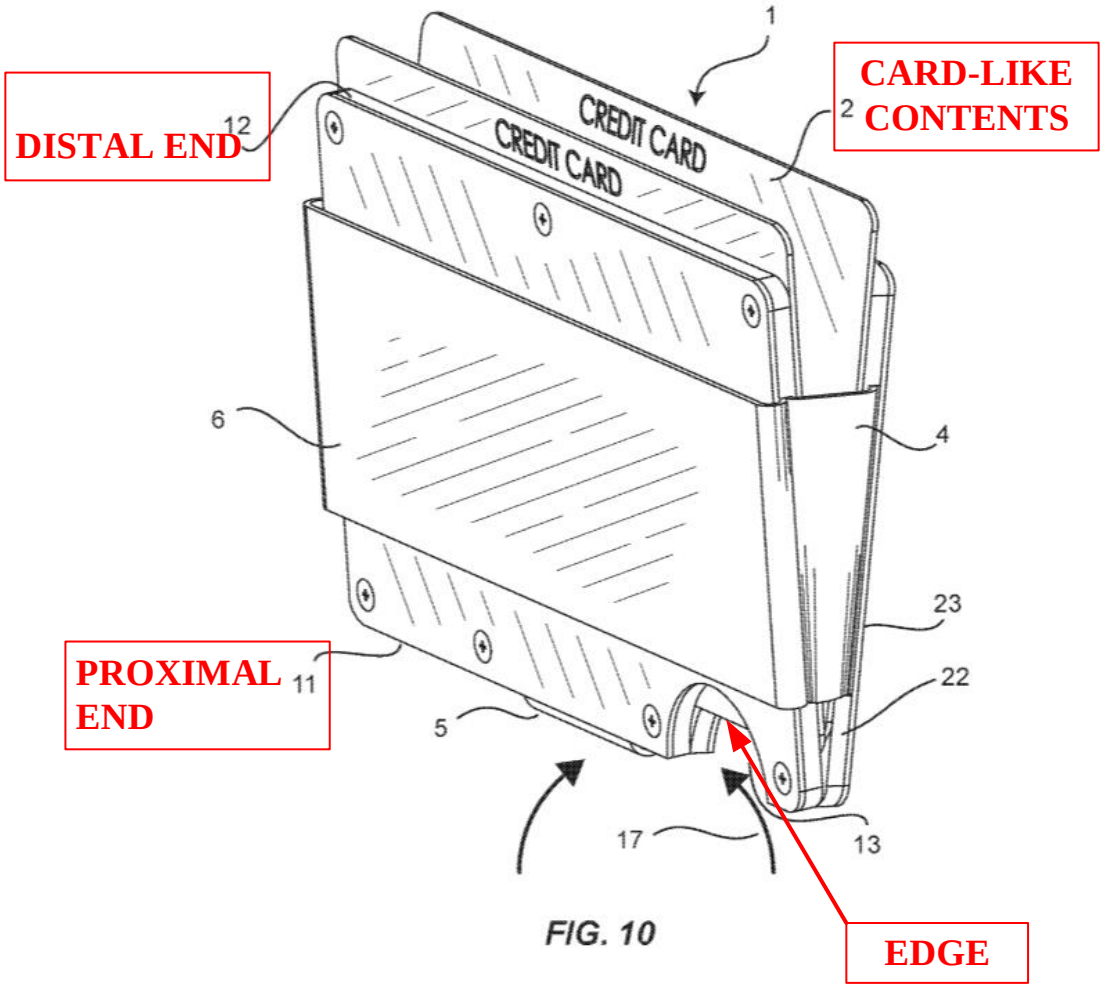


FIG. 10

(Ex. 1001, FIG. 10 (*annotated*).)

292. Therefore, a POSITA would have reasonably presumed that the structure disclosed by Kane inherently performs the function of "providing a fulcrum to lever the proximal ends together for the purpose of fanning the distal ends apart in display of the contents," as performed by the identical structural features disclosed by the '808 Patent.

293. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 12.

12. Claim 13

a. "The compact wallet of claim 1, wherein the encircling elastic band is comprised of woven elastic fabric."

294. In my opinion, Kane discloses this limitation.

295. As set forth above, the Kane-Beckley combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

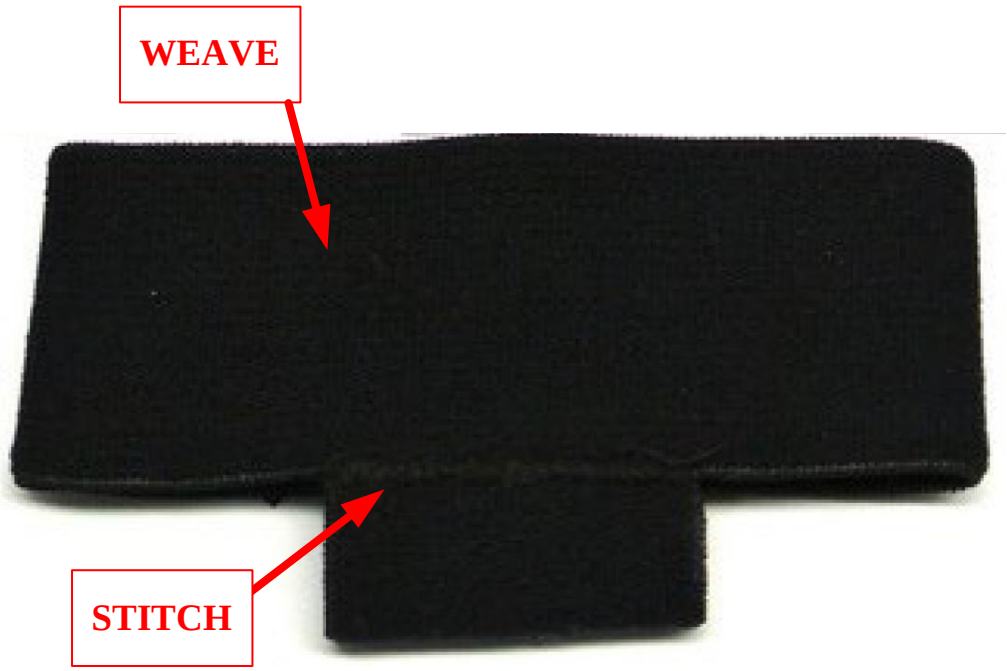
296. Kane discloses the following photograph of the encircling elastic band, and a POSITA would have understood the photograph to be depicting a woven elastic fabric.



(Ex. 1006 at 5 (*annotated*).)

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297. For example, upon magnifying the photograph, a weave of the elastic fabric is visible, along with stitching that is typical to woven elastic fabrics.



(*Id*. (*annotated*))

298. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 13.

13. Claim 14

a. "A compact wallet, comprising:"

299. As discussed above in Section IX.A.1.a, with respect to limitation "a" of Claim 1, both Kane and Beckley disclose a compact wallet. (Ex. 1006 at 2-3; Ex. 1007 at ¶ [0034], FIGS. 4A-4B.) The discussion of Claim 1 presented in Section IX.A.1.a is incorporated herein by reference.

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300. Accordingly, in my opinion, the Kane-Beckley combination discloses the preamble of Claim 14.

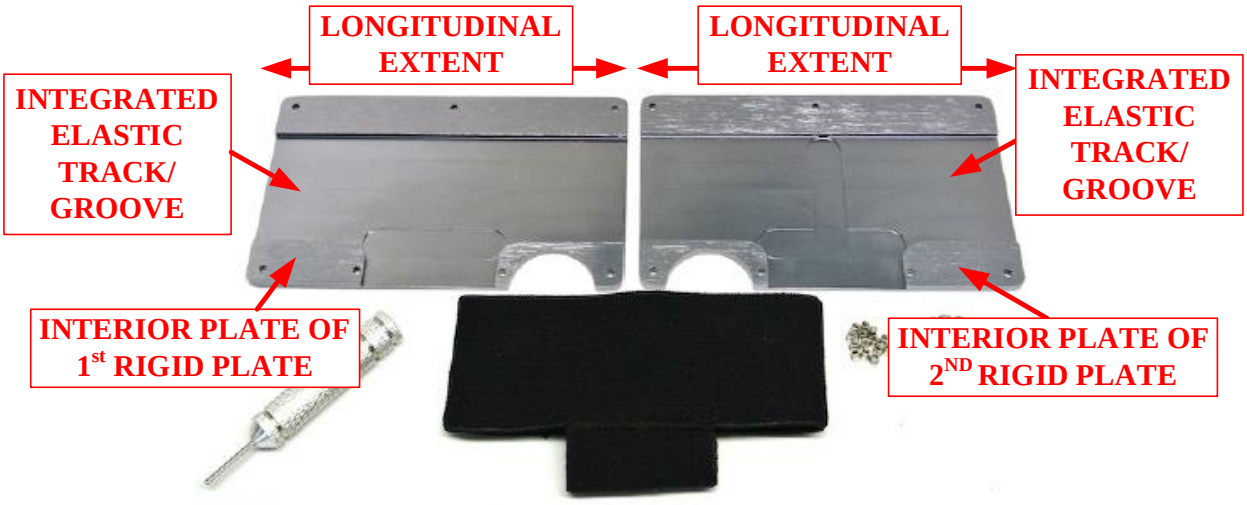
b. "at least two rigid plates interposed to sandwich card-like contents there between, each rigid plate having a groove along a longitudinal extent thereof;"

301. In my opinion, Kane discloses this limitation.

302. As discussed above in Section IX.A.1.b, with respect to limitation "b" of Claim 1, Kane discloses at least two interior plate-outer faceplate pairs ("rigid plates") interposed to sandwich card-like contents there between. (Ex. 1006 at 5-6.) Further, Kane also discloses that the interior plate-outer faceplate pairs (the "rigid plates") have a longitudinal extent thereof. (*Id*.) The discussion of Claim 1 presented in Section IX.A.1.b is incorporated herein by reference.

303. Further, Kane discloses an integrated elastic track in each of the interior plate-outer faceplate pairs ("rigid plates") along the longitudinal extent thereof. (*Id*. at 5: "The track runs along two hollow interior plates machined from anodized aircraft grade aluminum.") A POSITA, reading Kane, would have understood the integrated elastic track to constitute the claimed "groove." For example, Kane discloses a photograph of the interior plates of the two interior plate-outer faceplate pairs ("rigid plates") and the integrated elastic track ("groove") along the longitudinal extent thereof.

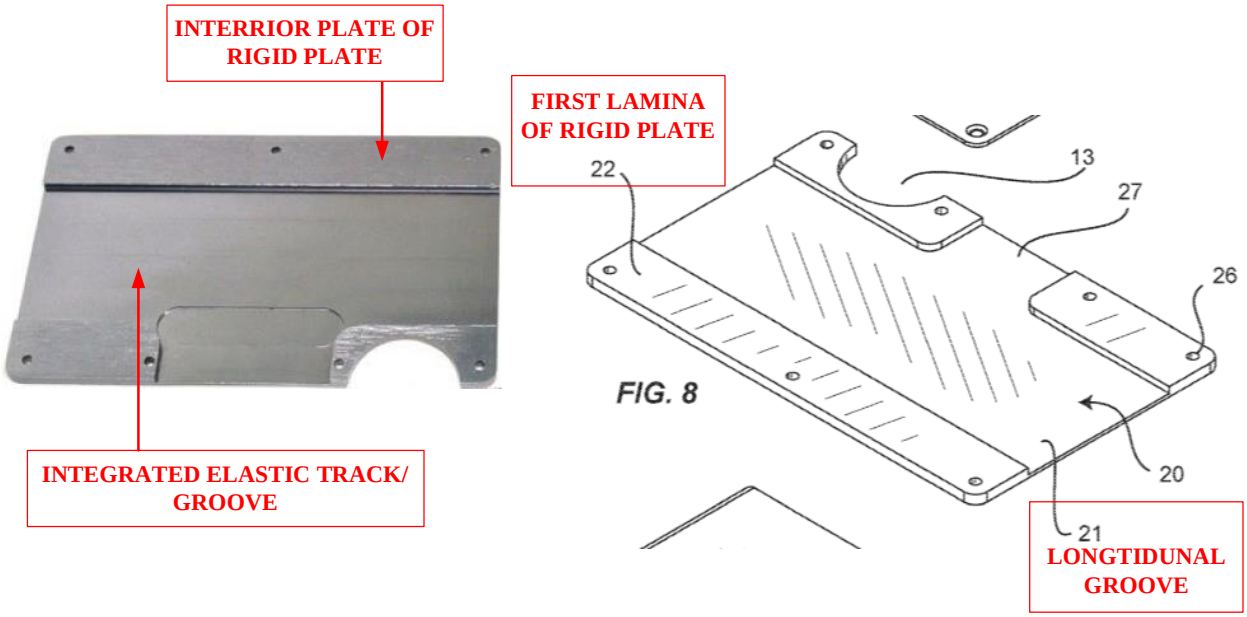
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(*Id.* (*annotated*))

304. In my opinion, a POSITA, reading Kane, would have understood the interior plates and integrated elastic track to be identical to the first lamina **22** of the rigid plates **10** and longitudinal groove **21** depicted in FIG. 8 of the '808 Patent. Below is a side-by-side display of an interior plate and integrated elastic track disclosed by Kane (left) along with the first lamina **22** of a rigid plate **10** and longitudinal groove **21** disclosed in FIG. 8 of the '808 Patent (right).

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(*Id*. at 5 (*annotated*); Ex. 1001, FIG. 8 (*annotated*).)

305. Likewise, in my opinion, a POSITA would have understood the interior plates to sandwich card-like contents in the same manner as depicted in FIG. 1 of the '808 Patent; which depicts the card-like contents **2** and rigid plates **10**.

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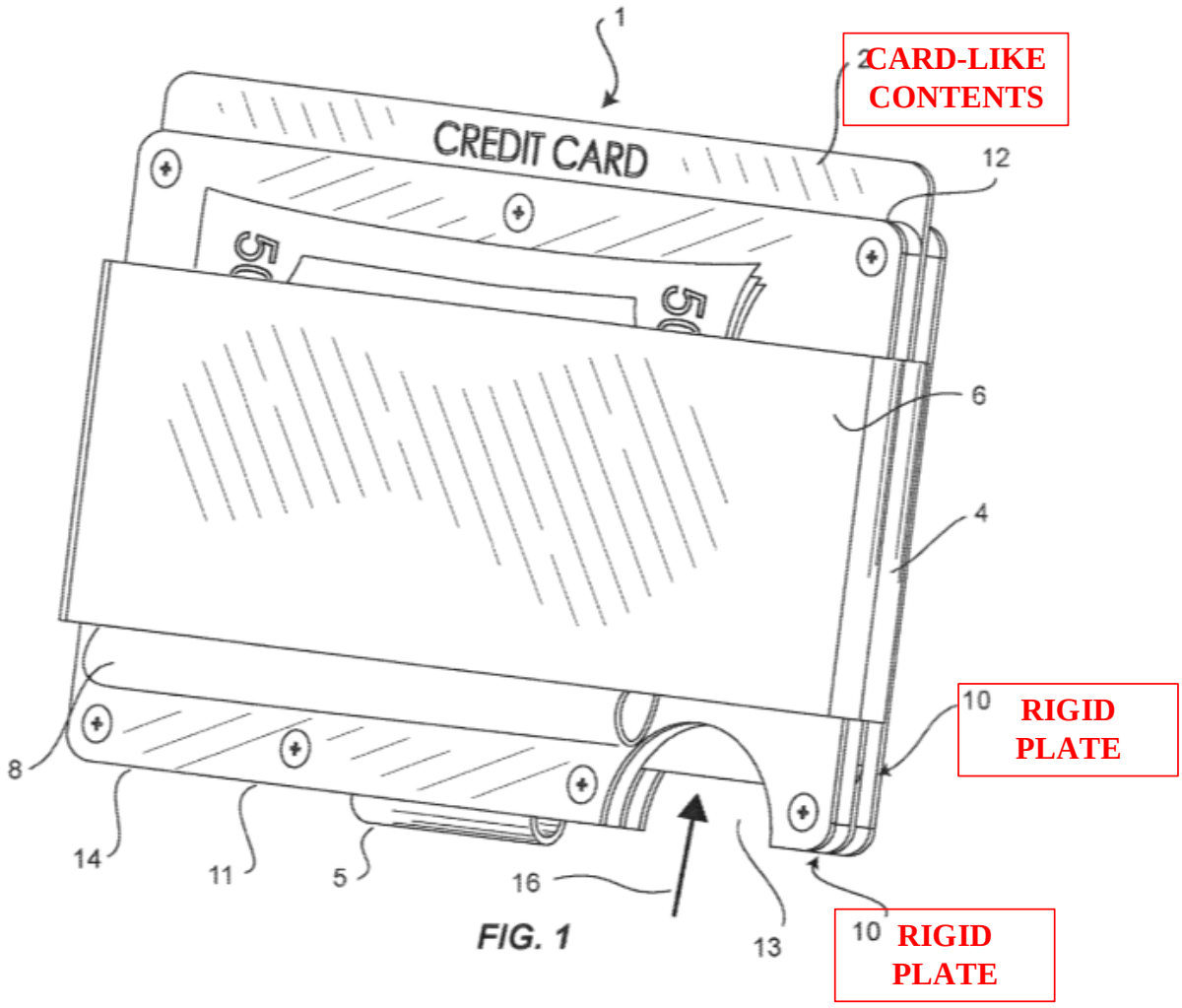


FIG. 1

(Ex. 1001, FIG.1 (*annotated*).)

306. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 14.

c. "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,"

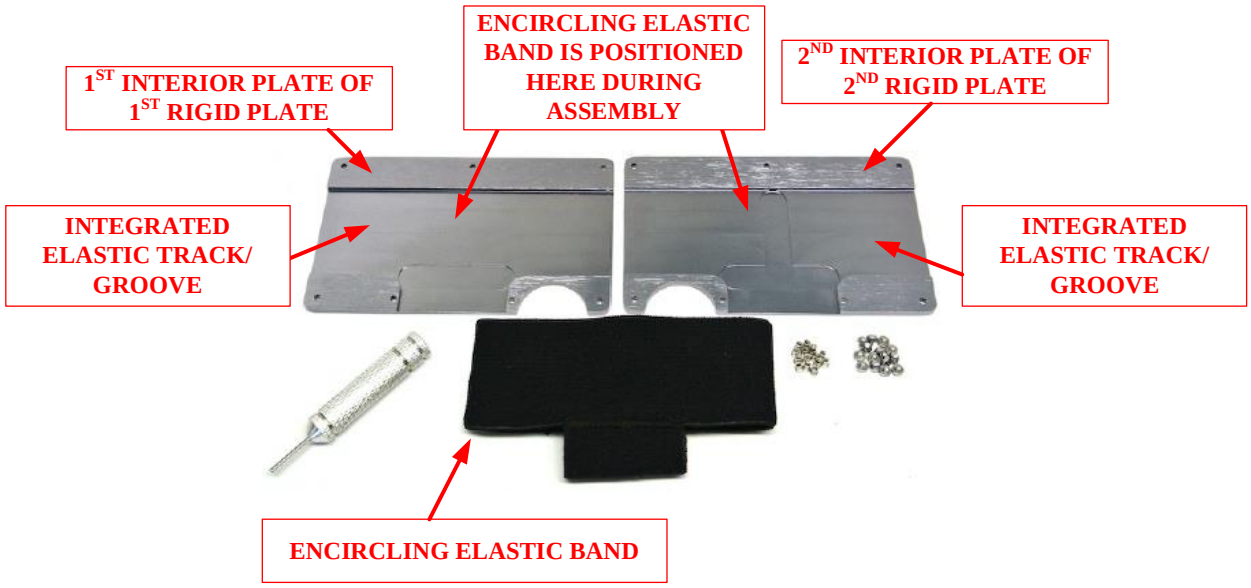
307. In my opinion, Kane discloses this limitation.

308. Claim 14 does not provide antecedent basis for "the grooves;" however, in my opinion, a POSITA would understand "the grooves" to constitute the collective of each "groove" of the at least two rigid plates in accordance with the recitation of limitation "b" of Claim 14.

309. As discussed above in Section IX.A.1.c, Kane discloses an encircling elastic band that biases the at least two interior plate-outer faceplate pairs ("rigid plates") inwardly (toward each other) to securely hold the card-like contents. Further, Kane discloses that the encircling elastic band provides elastic volume between the at least two interior plate-outer faceplate pairs ("rigid plates") for adding or removing contents. (Ex. 1006 at 2: "[w]ith an integrated elastic track, The Ridge 2.0 can accommodate various numbers of cards without losing elasticity," and 5: "[t]he Integrated Elastic Track [sic] can expand to hold up to 12 cards and then immediately contract to hold a single card securely.") The discussion of Claim 1 presented in Section IX.A.1.c is incorporated herein by reference.

310. Further, Kane discloses that the encircling elastic band is interposed in the integrated elastic track ("groove") of each interior plate of each interior plate-

outer faceplate pair ("rigid plate"). For example, Kane discloses the following photograph that shows the encircling elastic band and the band's interposition with the interior plates of the interior plate-outer faceplate pairs ("rigid plates").

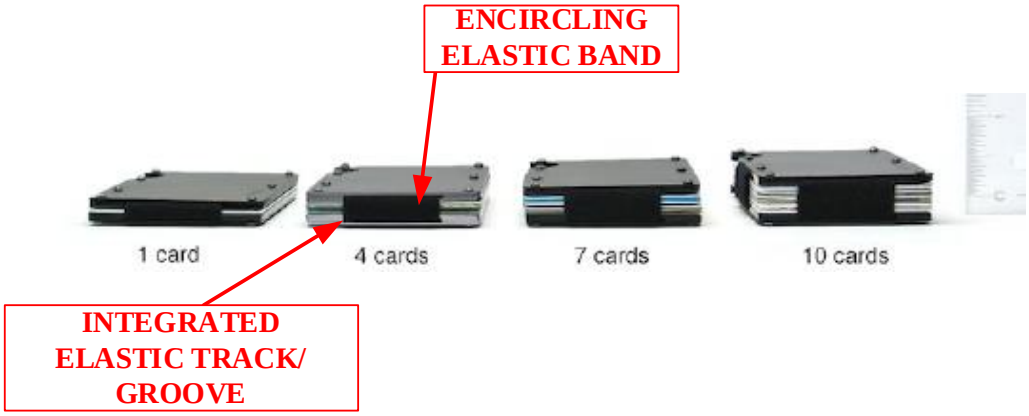


(*Id.* at 5 (*annotated*).)

311. Kane discloses that the card-like contents slide smoothly against the interior plates of the interior plate-outer faceplate pairs ("rigid plates"). (Ex. 1006 at 5; *Id*. at 8.) A POSITA, reading Kane, would have understood the encircling elastic band to likewise be slidingly interposed in the integrated elastic track ("grooves"). For example, a POSITA would have expected the elastic band to readily slide against the machined aluminum material of integrated elastic track ("grooves") during expansion/contraction of the elastic.

312. Additionally, Kane discloses the following photograph showing the encircling elastic band being received within the integrated elastic track ("grooves").

A POSITA viewing the following photograph would have understood the elastic band to be stretching/contracting as more card-like contents are added/removed to/from the wallet, and that the stretching/contracting would entail the elastic band sliding within integrated elastic track ("grooves").



(*Id.* at 5.)

313. In my opinion, a POSITA, reading Kane, would have understood the encircling elastic band and the interior plate-outer faceplate pairs ("rigid plates") to be interposed in the same manner as the encircling elastic band **4** and rigid plates **10** (composed of a first lamina **22** and a second lamina **23**) depicted in FIG. 2 of the '808 Patent; which depicts the rigid plates **10** and encircling elastic band **4**.

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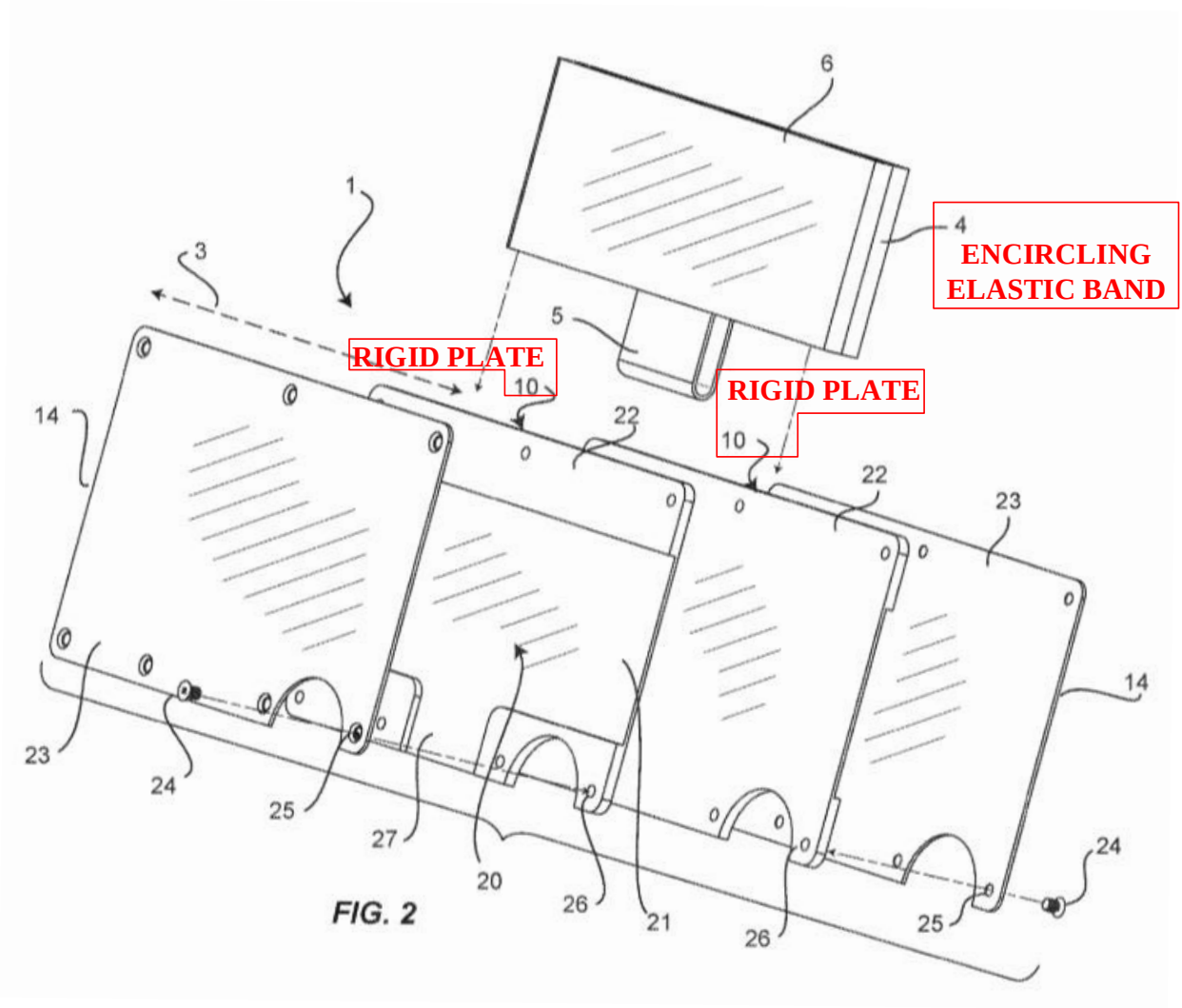


FIG. 2

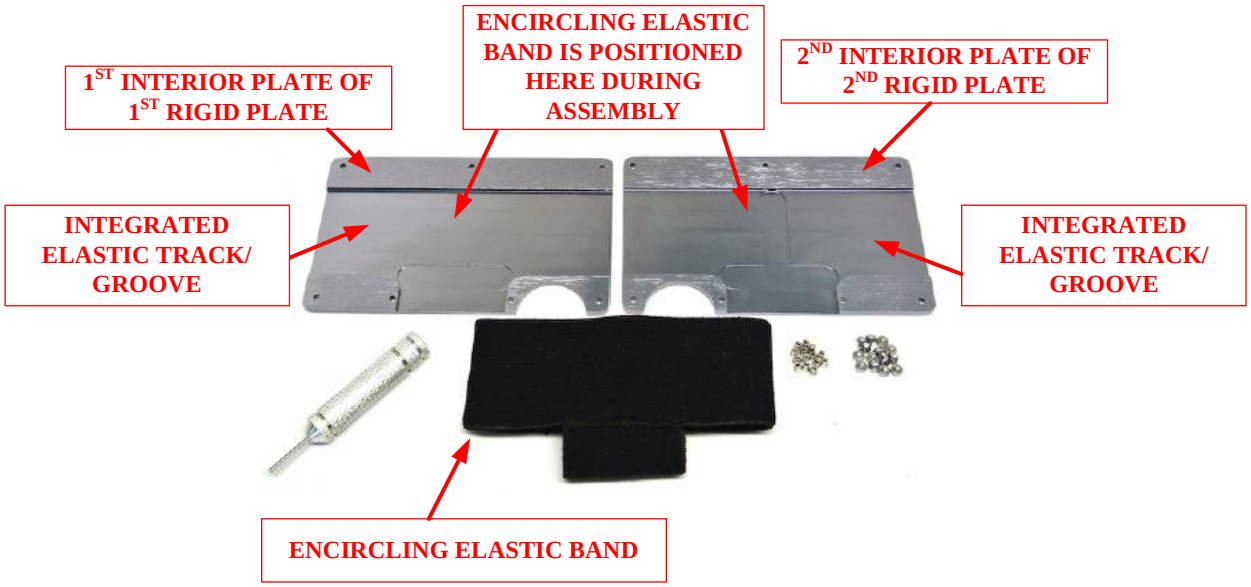
(Ex. 1001, FIG. 2 (*annotated*).)

314. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 14.

d. "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"

315. In my opinion, Kane discloses this limitation.

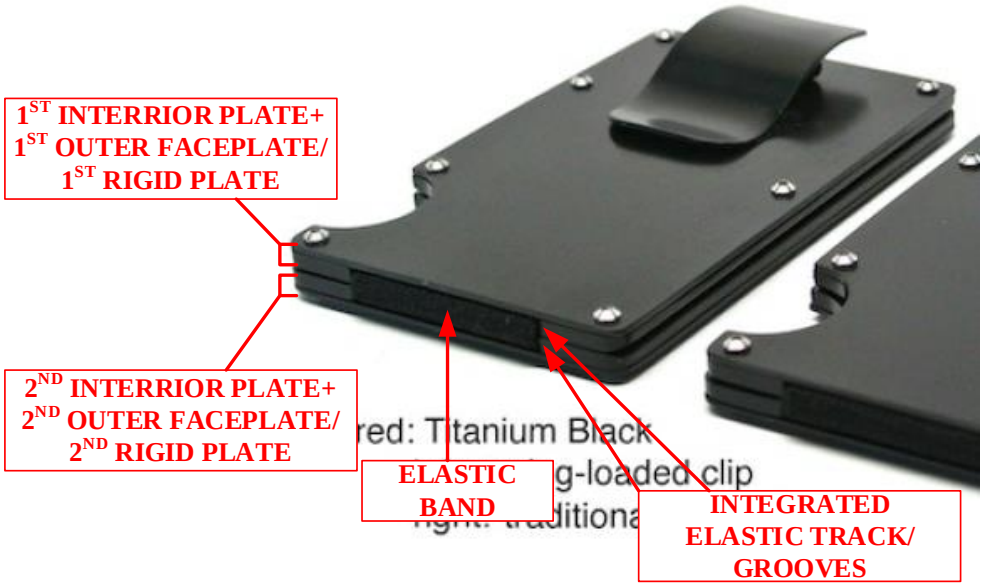
316. Kane discloses that the integrated elastic track ("grooves") is configured to hold the position of the encircling elastic band with respect to each of the interior plate-outer faceplate pairs ("rigid plates). For example, Kane discloses the following photograph of the interior plates of the interior plate-outer faceplate pairs ("rigid plates") and integrated elastic track ("grooves"); where the integrated elastic track is shown as a groove in the interior plates.



(*Id.* at 5 (*annotated*).)

317. Likewise, Kane discloses multiple photographs, such as the annotated photograph below, of the integrated elastic track ("grooves") visible from a side perspective of the wallet; where the encircling elastic band is shown positioned in the integrated elastic track (*i.e.*, within the groove running the length of the interior plates).

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(*Id.* at 7.)

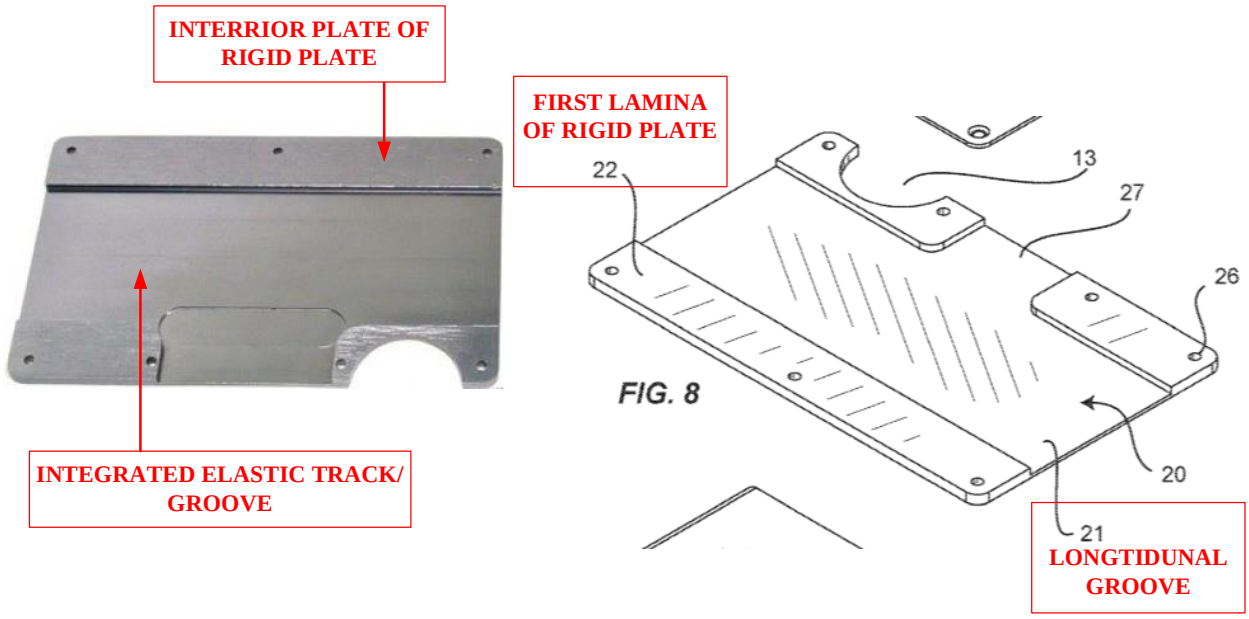
318. A POSITA, reading Kane, would have understood that the integrated elastic track ("grooves") holds the position of the encircling elastic band by inhibiting the band from sliding laterally off the central longitudinal axis of the compact wallet.

319. In addition, Kane discloses that the integrated elastic track ("grooves") allows for the freedom of dynamic extension and contraction of the band over the entire running length thereof. (*Id.* at 5: "The Integrated Elastic Track [sic] can expand to hold up to 12 cards and then immediately contract to hold a single card securely.") For example, Kane discloses the following photograph depicting dynamic extension and contraction over the entire running length of the encircling elastic band.



(*Id.* (*annotated*))

320. In my opinion, a POSITA, reading Kane, would have understood the integrated elastic track to be configured in an identical, or at least equivalent, manner as the longitudinal groove **21** depicted in FIG. 8 of the '808 Patent. Below is a side-by-side display of an interior plate and integrated elastic track disclosed by Kane (left) along with a first lamina **22** of a rigid plate **10** and channeling means **20** disclosed in FIG. 8 of the '808 Patent (right).



(*Id.* at 5 (*annotated*); Ex. 1001, FIG. 8 (*annotated*).)

321. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 14.

e. "a recess formed inside at least one of the at least two rigid plates,"

322. In my opinion, the Kane-Beckley combination discloses this limitation.

323. As discussed above in Section IX.A.1.f, with respect to limitation "f" of Claim 1, Beckley discloses a depression **15** ("recess") formed inside a base **2** of the wallet **5**. (Ex. 1007 at ¶¶ [0038]-[0039], FIG. 1.) A POSITA, reading Beckley, would have understood the depression **15** to constitute the claimed "recess." The discussion of Claim 1 presented in Section IX.A.1.f is incorporated herein by reference.

324. Further, to the extent that Beckley is found not to teach the depression **15** ("recess") formed inside a rigid plate; a POSITA would have been motivated to form a depression, like that disclosed by Beckley, inside an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, to effectuate a removably attached money clip that advances the personalization, adapted use, and maintenance operations discussed herein. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange the outer plates for greater personalization," 9-10: "without money clip… with traditional money clip… with spring-loaded money clip;" Ex. 1007 at ¶ [0034]: "A clip **3** in this

embodiment is generally configured for holding paper currency, although it may function to hold a number of varying articles. In yet another embodiment, the clip **3** may be used to fasten the container to another object such as a pocket, personal organizer or book, for example.")

325. Further, a POSITA would have good reason to incorporate the teachings of Beckley into Kane with a reasonable expectation of success at least because Kane and Beckley are in the same technical field, address similar problems, utilize similar devices, and disclose methods that when combined function in the same manner as each does separately to yield predictable results, as set forth in Section IX.A.1.e; which is incorporated here. (Ex. 1006 at 2-5 and 8-9; Ex. 1007 at ¶¶ [0002], [0004], [0008], [0010], [0034], [0038]-[0039], and FIG. 1.). In doing so, the POSITA would apply a known technique to a known device ready for improvement to yield predictable results.

326. For example, a POSITA would be motivated to form a depression ("recess"), like that disclosed by Beckley, in an interior plate of an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, to effectuate the removable attachment of a clip ("auxiliary feature") to compact wallet. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences;" Ex. 1007 at

¶¶ [0034], [0038]-[0039], and FIG. 1.) Moreover, forming a depression ("recess), like that disclosed by Beckley, in an interior plate, like that disclosed by Kane, would be a mere continuation of one or more milling operations conducted to form the integrated elastic track ("channeling means"). As such, forming a depression ("recess), like that disclosed by Beckley, in an interior plate of a compact wallet, like that disclosed by Kane, would not require any additional machinery to manufacture, and minimal additional costs, if any. Such milling operations are routine and very familiar to a POSITA at the time of the Critical Date.

327. Accordingly, the Kane-Beckley combination discloses this limitation of Claim 14.

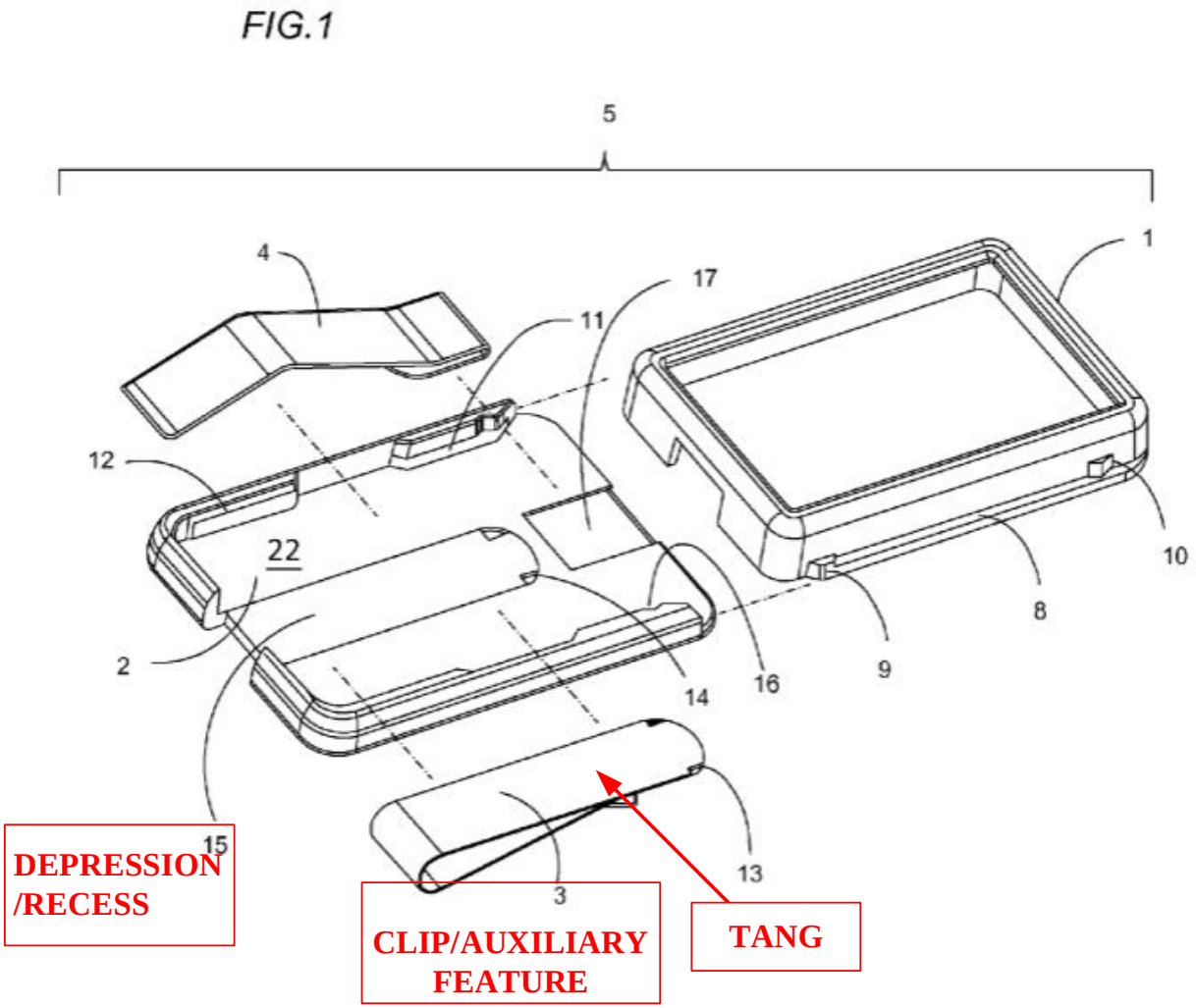
f. "the recess operable to receive a tang of an auxiliary feature,"

328. In my opinion, the Kane-Beckley combination discloses this limitation.

329. As discussed above in Section IX.A.1.f, with respect to limitation "f" of Claim 1, Beckley discloses a wallet **5** with a money clip **3** ("auxiliary feature"). (Ex. 1007 at ¶¶ [0038]-[0039], and FIGS. 2A, 4A-4B, 5A-5B, 6A-6B, and 7B.) Further, Beckley discloses that the depression **15** ("recess") is operable to receive a tang of the clip **3** ("auxiliary feature"). (Ex. 1006 at 6-7; Ex. 1007 at ¶¶ [0034]-

[0035] and FIGS. 1-2B.) The discussion of Claim 1 presented in Section IX.A.1.f is incorporated herein by reference.

330. For example, Beckley's FIG. 1 depicts the depression **15** ("recess") operable to receive a tang of the clip **3** ("auxiliary feature").



(*Id.* FIG. 1 (*annotated*).)

331. As discussed above in Section IX.B.1.e, Beckley discloses a clip **3** positioned exterior to the wallet **5**. (*Id.* at ¶¶ [0038]-[0039], FIGS. 1, 2B, 4A-5B, and

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6A-6B.) A POSITA, reading Beckley, would have understood the clip **3** to constitute the claimed "auxiliary feature."

332. Moreover, a POSITA would have been motivated to configure a compact wallet, like that disclosed by Kane, with a depression ("recess") operable to receive a tang of a clip ("auxiliary feature"), like that disclosed by Beckley, to render a compact wallet with a removable clip in accordance with the personalization, adapted use, and/or maintenance/repair operations promoted by Kane. For example, Beckley and Kane are in the same technical field, address similar problems, utilize similar devices, and disclose structural features that, when combined, function in the same manner as each does separately to yield predictable results, as set forth in Section IX.A.1.e; which is incorporated herein by reference. (Ex. 1006 at 2-5 and 8-9; Ex. 1007 at ¶¶ [0002], [0004], [0008], [0010], [0034], [0038]-[0039], and FIG. 1.). In doing so, a POSITA would be using a known technique to improve similar devices in the same way.

333. Accordingly, the Kane-Beckley combination discloses this limitation of Claim 14.

g. "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,"

334. In my opinion, the Kane-Beckley combination discloses this limitation.

335. As discussed above in Section IX.A.1.g and Section IX.A.1.i, with respect to limitations "g" and "i" of Claim 1, Beckley discloses that the depression **15** ("recess") has a set of cavities **14** ("undercut") that mate ("engage") with one or more barbs **13** ("hook") of the tang to prevent inadvertent dislodgement of the clip **3** ("auxiliary feature") from the depression **15** ("recess"). (Ex. 1007 at ¶ [0038]: "The clip **3** is assembled to the base **2** by inserting the clip **3** into a depression **15**. It is held in place by a pair of barbs seen at **13** mated into a set of cavities **14** on the base **2**," FIG. 1.)

336. Also discussed above in Section IX.A.1.g and Section IX.A.1.i, a POSITA, reading Beckley, would have understood one or more of the cavities **14** to constitute the claimed "undercut," and one or more of the barbs **13** to constitute the claimed "hook."

337. Further, as discussed above in Section IX.A.1.e, with respect limitation "e" of Claim 1, and Section IX.A.1.f, with respect to limitation "f" of Claim 1; Beckley discloses that the clip **3** ("auxiliary feature") is removably positioned in the

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depression **15** ("recess"), which a POSITA would be motivated to form inside at least one of the interior plate-outer faceplate pairs ("rigid plates").

338. The following discussions are incorporated herein by reference: the discussion of Claim 1 presented in Section IX.A.1.e; the discussion of Claim 1 presented in Section IX.A.1.f; the discussion of Claim 1 presented in Section IX.A.1.g; and the discussion of Claim 1 presented in Section IX.A.1.i.

339. In my opinion, a POSITA would have looked to Beckley for guidance on how to removably attach a money clip ("auxiliary feature") to a compact wallet, like that disclosed by Kane, via engagement of one or more barbs ("hook") with one or more cavities ("undercut") in a depression ("recess"), like that disclosed by Beckley, because Beckley and Kane are in the same technical field, address similar problems, utilize similar devices, and disclose structural features that, when combined, function in the same manner as each does separately to yield predictable results, as set forth in Section IX.A.1.e; which is incorporated here. (Ex. 1006 at 2-5 and 8-9; Ex. 1007 at ¶¶ [0002], [0004], [0008], [0010], [0034], [0038]-[0039], and FIG. 1.).

340. In doing so, a POSITA would be using a known technique to improve similar devices in the same way. The technique of configuring compact wallets with an attached money clip ("auxiliary feature") that is removable via engagement of one or more barbs ("hook") with one or more cavities ("undercut") in a depression

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("recess") was within the realm of ordinary capabilities of a POSITA based upon the teachings of at least Beckley. (Ex. 1007 at ¶¶ [0038]-[0039].) Further, a POSITA would have been capable of applying this known method of configuring the compact wallet of Kane to yield predictable results.

341. Having reviewed Beckley, such a POSITA would have been motivated to removably attach a money clip ("auxiliary feature") to an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, via a barb ("hook") and cavity ("undercut") engagement in a depression ("recess"), like that disclosed by Beckley, to provide a compact wallet that allows a consumer to remove the money clip ("auxiliary feature") when not needed, in accordance with the minimalist preferences inherent to the compact wallet marketplace. (Ex. 1006 at 9-10: "without money clip," "with traditional money clip," "with spring-loaded money clip;" Ex. 1007: "Certain embodiments of the invention include an exterior clip….")

342. Moreover, a POSITA would have had good reason to incorporate the teachings of Beckley into Kane, as discussed above, with a reasonable expectation of success to advance the maintenance operations promoted by Kane. For example, Kane discloses turning a wallet "into a 'system' that can be completely disassembled by the user to replace the elastic and exchange outer plates for greater personalization." (Ex. 1006 at 3.) Rendering the money clip ("auxiliary feature") removable via a barb ("hook") and cavity ("undercut") engagement in a depression

("recess"), like that disclosed by Beckley, advances the disassembly and personalization of the wallets, as suggested by Kane. (Ex. 1006 at 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences.")

343. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 14.

h. "the hook extending at an angle to the tang,"

344. In my opinion, the Kane-Beckley combination discloses this limitation.

345. As discussed above in Section IX.A.1.h, with respect to limitation "h" of Claim 1, Beckley discloses the barbs **13** ("hook") extending at an angle to the tang of the clip **3** ("auxiliary feature"). (Ex. 1007, FIG. 1.) The discussion of Claim 1 presented in Section IX.A.1.h is incorporated herein by reference.

346. Further, a POSITA would have been motivated to configure a compact wallet, like that disclosed by Kane, with a money clip having a tang with one or more barbs ("hook") extending at an angle therefrom, like that disclosed by Beckley, to achieve a removable money clip because Kane and Beckley are in the same technical field, address similar problems, utilize similar devices, and disclose methods that when combined function in the same manner as each does separately to yield predictable results, as set forth in Section IX.A.1.e; which is incorporated here. (Ex.

1006 at 2-5 and 8-9; Ex. 1007 at ¶¶ [0002], [0004], [0008], [0010], [0034], [0038]-[0039], and FIG. 1.). In doing so, the POSITA would apply a known technique to a known device ready for improvement to yield predictable results.

347. Such a POSITA would have been motivated to configure a compact wallet, like that disclosed by Kane, with a money clip having a tang with one or more barbs ("hook") extending at an angle therefrom, like that disclosed by Beckley, to enable a consumer to remove the money clip when not needed, in accordance with the minimalist preferences inherent to the compact wallet marketplace. (Ex. 1006 at 9-10: "without money clip," "with traditional money clip," "with spring-loaded money clip;" Ex. 1007: "Certain embodiments of the invention include an exterior clip….")

348. Moreover, a POSITA would have had good reason to incorporate the teachings of Beckley into Kane, as discussed above, with a reasonable expectation of success to advance the maintenance operations promoted by Kane. For example, Kane discloses turning a wallet "into a 'system' that can be completely disassembled by the user to replace the elastic and exchange outer plates for greater personalization." (Ex. 1006 at 5.) Utilizing one or more barbs ("hook") extending at an angle to the tang of the money clip, as disclosed by Beckley, facilitates removable attachment of the money clip and advances the disassembly and personalization of the wallets, as suggested by Kane. (Ex. 1006 at 15-16: "Our

biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences.")

349. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 14.

i. "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."

350. In my opinion, Kane discloses this limitation.

351. As discussed above in Section IX.A.1.j, with respect to limitation "j" of Claim 1, Kane discloses a compact wallet that carries card-like contents on a person with minimal silhouette while allowing expandable capacity and ready access to individual contents from between the interior plate-outer faceplate pairs ("rigid plates.") (Ex. 1006 at 2-5.) The discussion of Claim 1 presented in Section IX.A.1.j is incorporated herein by reference.

352. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 14.

14. Claim 15

a. "The compact wallet of claim 14, wherein the groove is in a first lamina of a laminate construction of each rigid plate,"

353. In my opinion, Kane discloses this limitation.

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354. As set forth above, the Kane-Beckley combination discloses each and every limitation of Claim 14, and said discussion is incorporated herein by reference.

355. As discussed above in Section IX.A.2.a, with respect to limitation "a" of Claim 2, Kane discloses that each interior plate-outer faceplate pair ("rigid plate") is a laminate construction composed of an interior plate ("first laminate") and an outer faceplate, where the integrated elastic track ("groove") is positioned in the interior plate ("first laminate"). (*Id*. at 4-5.) The discussion of Claim 2 presented in Section IX.A.2.a is incorporated herein by reference.

356. In my opinion, a POSITA, reading Kane, would have understood the position of the integrated elastic track along with the combination of interior plates secured to outer faceplates, to be identical, or at least equivalent to, the longitudinal groove **21** and laminate construction (*i.e.*, the first lamina **22** and the second lamina **23**) depicted in FIGS. 7-9 of the '808 Patent.

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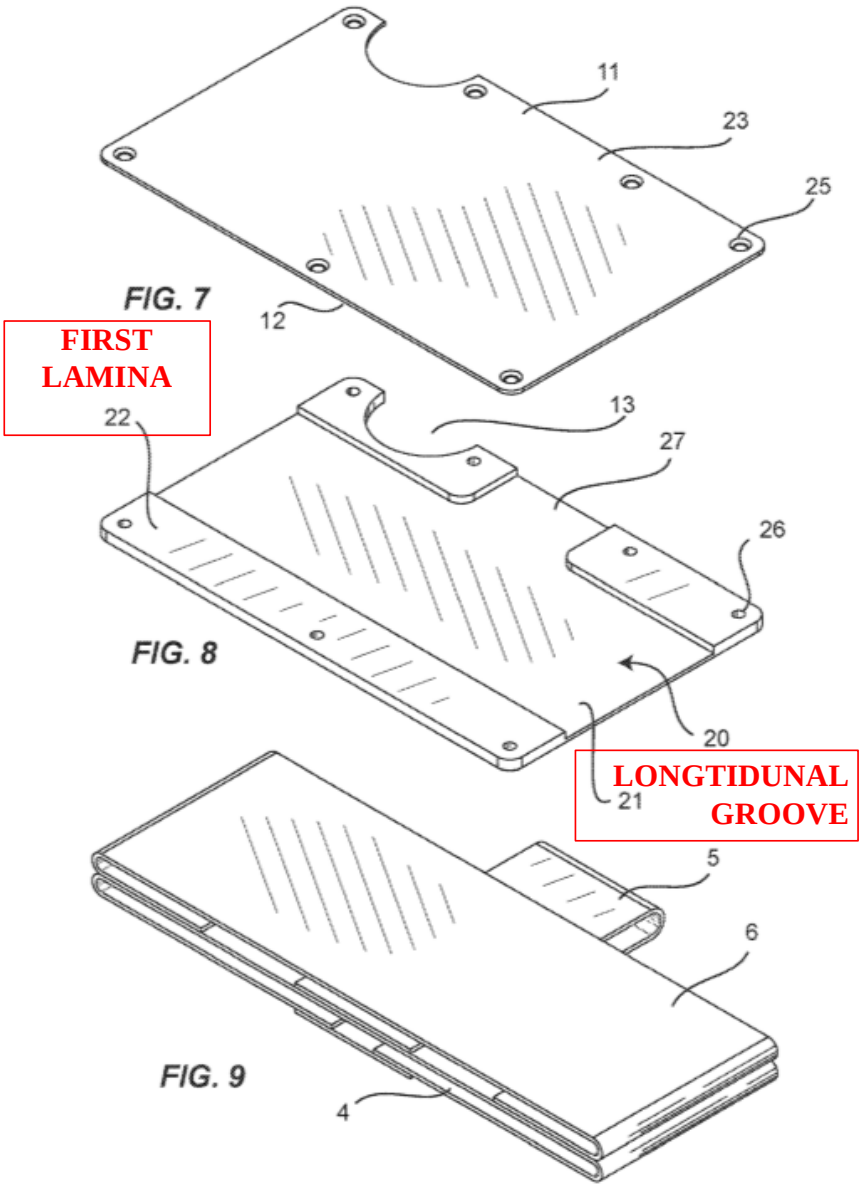


FIG. 7

FIG. 8

FIG. 9

(Ex. 1001, FIGS. 7-9 (*annotated*).)

357. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 15.

b. "the groove slidingly receiving one part of the at least one encircling elastic band."

358. In my opinion, Kane discloses this limitation.

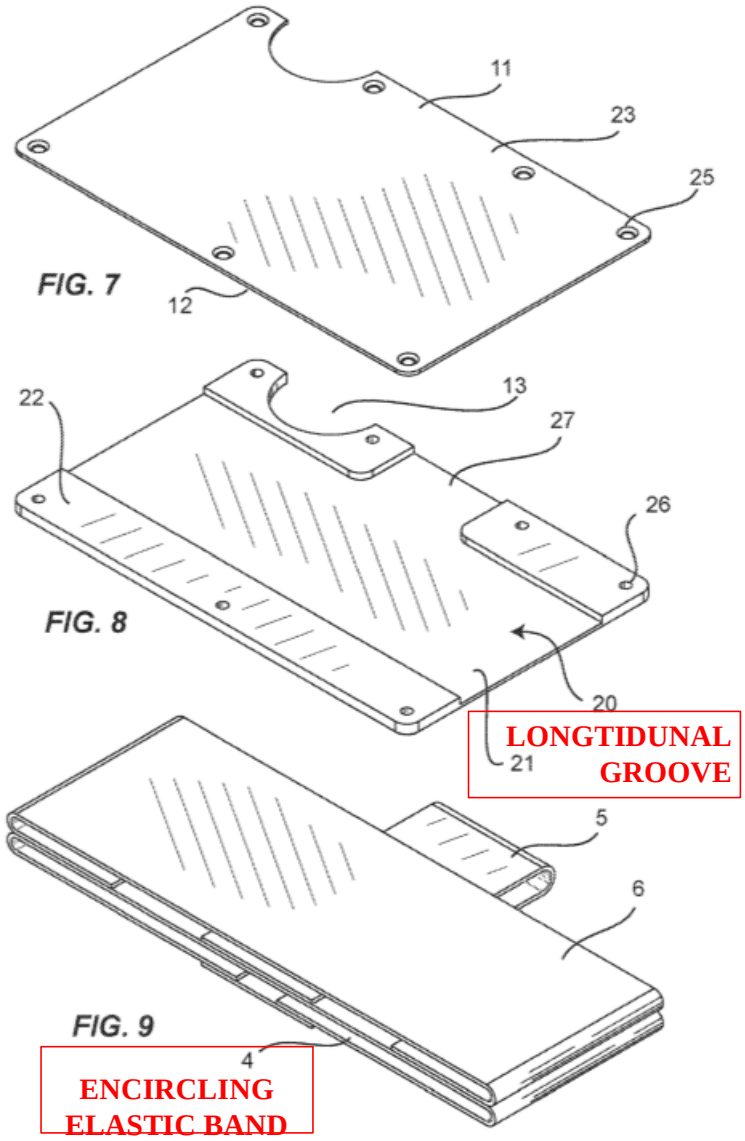
359. As set forth above, the Kane-Beckley combination discloses each and every limitation of claim 14, and said discussion is incorporated herein by reference.

360. A POSITA would have understood this limitation to be duplicative of limitation "c" of Claim 14. For example, "at least one encircling elastic band slidingly interposed in the grooves," as recited in limitation "c" of Claim 14, is duplicative of "the groove slidingly receiving one part of the at least one encircling elastic band." Accordingly, the discussion of Claim 14 presented in Section IX.A.13.c is incorporated herein by reference.

361. As discussed above in Section IX.A.2.b, with respect to limitation "b" of Claim 2, Kane discloses that the integrated elastic track ("groove") slidingly receives the encircling elastic band. (Ex. 1006 at 5-8.) The discussion of Claim 2 presented in Section IX.A.2.b is incorporated herein by reference.

362. In my opinion, a POSITA, reading Kane, would have understood the integrated elastic track to slidingly receive the encircling elastic band, in an identical, or at least equivalent, manner to the encircling elastic band **4** and longitudinal groove **21** depicted in FIGS. 7-9 of the '808 Patent.

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(Ex. 1001, FIGS. 7-9 (*annotated*).)

363. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 15.

15. Claim 16

a. "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."

364. In my opinion, Kane discloses this limitation.

365. As set forth above, the Kane-Beckley combination discloses each and every limitation of Claim 15, and said discussion is incorporated herein by reference.

366. As discussed above in Section IX.A.3.a, a POSITA, reading Kane, would have understood the outer faceplate to constitute the claimed "second lamina." Further, Kane discloses that the outer faceplate ("second lamina") is attached to the interior plate ("first lamina") by removable screws to capture the elastic band while providing a smooth gliding surface. (Ex. 1006 at 4-7.) The discussion of Claim 3 presented in Section IX.A.3.a is incorporated herein by reference.

367. In my opinion, a POSITA, reading Kane, would have understood the interior plates in combination with the outer faceplates (collectively, the "laminate construction" of the "rigid plates") to capture the encircling elastic band and provide a smooth surface for glide in an identical, or at least equivalent, manner as the laminate construction (*e.g.*, composed of the first lamina **22** and the second lamina

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23) depicted in FIG. 2 of the '808 Patent; which depicts the elastic band **4**, the first lamina **22**, the second lamina **23**, and the screws **24**.

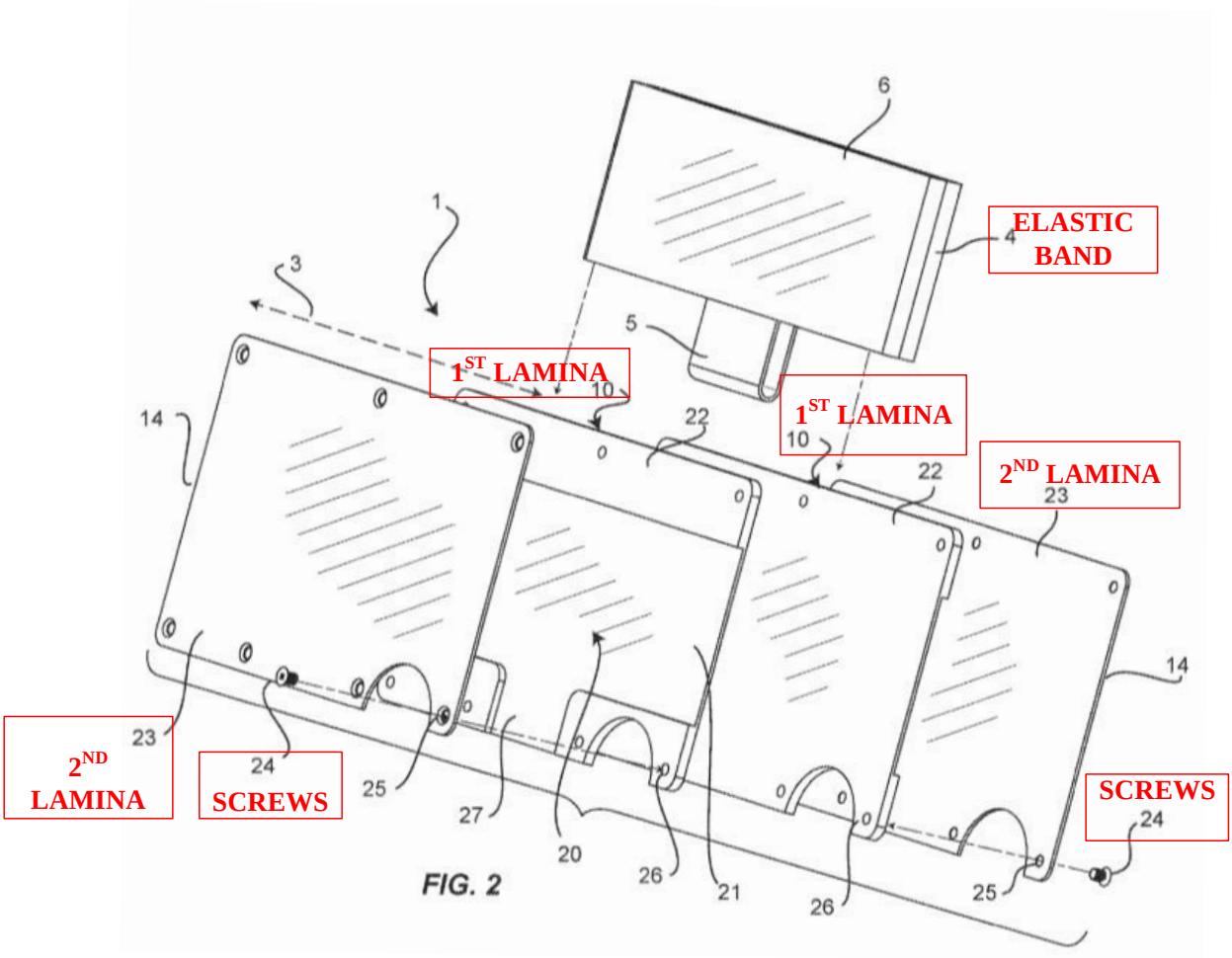


FIG. 2

(Ex. 1001, FIG. 2 (*annotated*).)

368. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 16.

16. Claim 17

a. "The compact wallet of claim 16, wherein the second lamina is attached to the first lamina by screws."

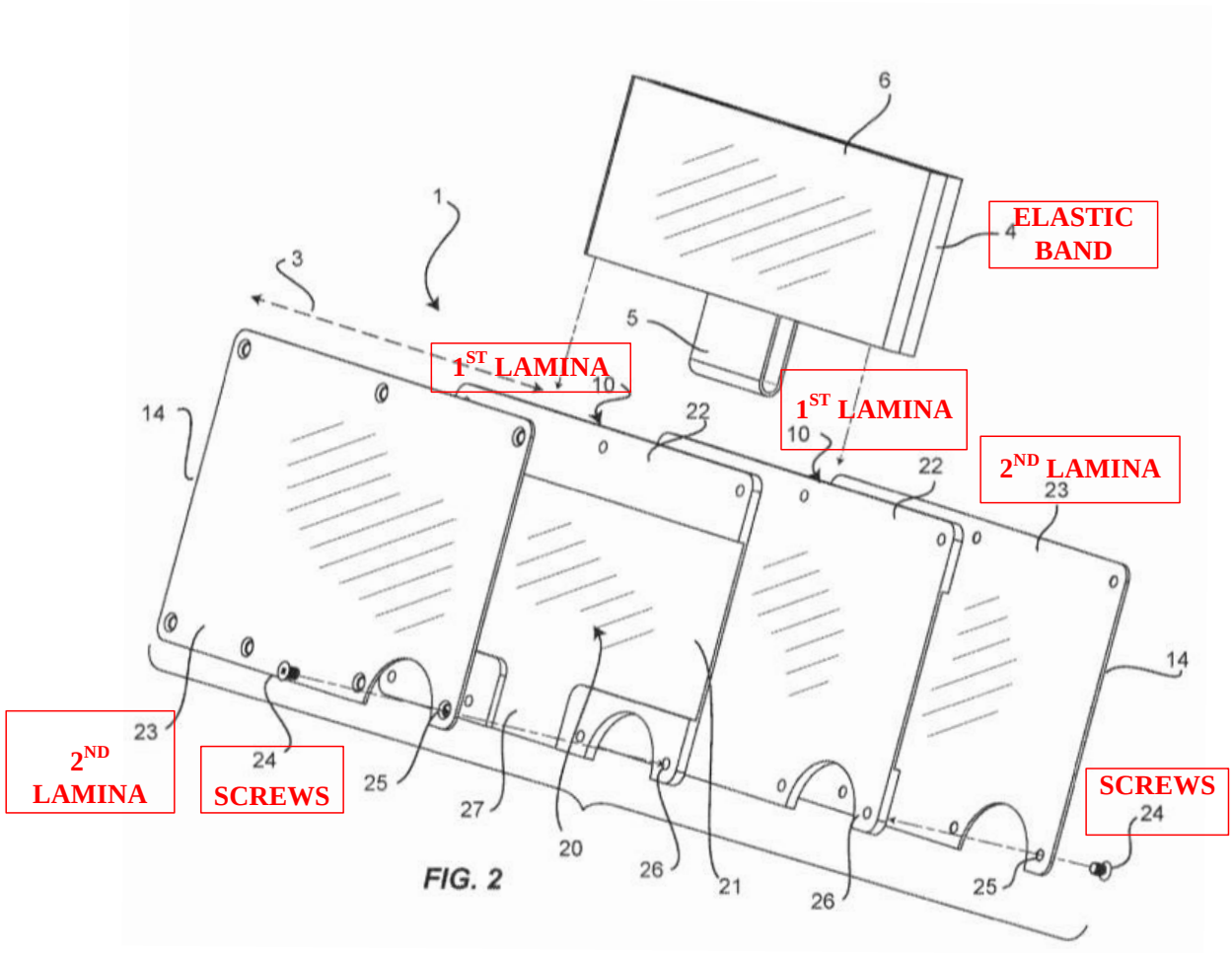
369. In my opinion, Kane discloses this limitation.

370. As set forth above, the Kane-Beckley combination discloses each and every limitation of Claim 16, and said discussion is incorporated herein by reference.

371. As discussed above in Section IX.A.4.a, Kane discloses that the outer faceplate ("second lamina") is attached to the interior plate ("first lamina") by screws. (Ex. 1006 at 3, 4, and 7.) The discussion of Claim 4 presented in Section IX.A.4.a is incorporated herein by reference.

372. In my opinion, a POSITA, reading Kane, would have understood the outer faceplates ("second lamina") to be attached to the interior plates ("first lamina") via screws in an identical, or at least equivalent, manner as the laminate construction (*e.g.*, composed of the first lamina **22** and the second lamina **23**) depicted in FIG. 2 of the '808 Patent; which depicts the elastic band **4**, the first lamina **22**, the second lamina **23**, and the screws **24**.

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(Ex. 1001, FIG. 2 (*annotated*).)

373. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 17.

17. Claim 18

a. "The compact wallet of claim 1, wherein each rigid plate is comprised of metal for RFID protection."

374. In my opinion, Kane discloses this limitation.

375. As set forth above, the Kane-Beckley combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

376. Claim 18 is a duplicate of Claim 7. As discussed above in Section IX.A.7.a, Kane discloses that the interior plate of the interior plate-outer faceplate pairs ("rigid plates") is machined aluminum (a metal) and provides RFID protection. (Ex. 1006 at 5 and 8.) The discussion of Claim 7 presented in Section IX.A.7.a is incorporated herein by reference.

377. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 18.

18. Claim 19

a. "A method of making a modular compact wallet, comprising the steps:"

378. Claim 19 recites a method for making, in my opinion, the compact wallet recited in Claim 1 and/or Claim 14.

379. Accordingly, the discussion of Claim 1 presented in Section IX.A.1 and the discussion of Claim 14 presented in Section IX.A.13 are incorporated herein by reference.

380. Both Kane and Beckley each disclose methods of making a modular compact wallet. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange outer plates for greater personalization… low profile to easily fit in your front pocket;" Ex. 1007

at ¶ [0034]: "the size and shape of the containter [sic] may be adapted for use for particular articles.")

381. Accordingly, in my opinion, the Kane-Beckley combination discloses the preamble of Claim 19.

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

382. In my opinion, Kane discloses this limitation.

383. As discussed above in Section IX.A.13.b, with respect to limitation "b" of Claim 14, Kane discloses at least two interior plate-outer faceplate pairs ("rigid plates"), each having an integrated elastic track ("groove") along a longitudinal extent thereof and interposed to sandwich card-like contents there between. (Ex. 1006 at 5-6.) The discussion of Claim 14 presented in Section IX.A.13.b is incorporated herein by reference.

384. Having reviewed Kane, a POSITA, in my opinion, would have understood that Kane discloses "providing" the interior plate-outer faceplate pairs ("rigid plates") to assemble the wallet.

385. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 19.

c. "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,"

386. In my opinion, Kane discloses this limitation.

387. As discussed above in Section IX.A.13.c, with respect to limitation "c" of Claim 14, Kane discloses an elastic band that is slidingly interposed in the integrated elastic track ("grooves") to encircle the at least two interior plate-outer faceplate pairs ("rigid plates"); thereby biasing the interior plate-outer faceplate pairs ("rigid plates") towards each other ("inwardly") to securely hold the card-like contents while providing elastic volume there between for adding or removing contents. (*Id.* at 3-5.) In my opinion, a POSITA would understand "the grooves" to constitute each "groove" of the "at least two rigid plates." The discussion of Claim 14 presented in Section IX.A.13.c is incorporated herein by reference.

388. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 19.

d. "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,"

389. In my opinion, Kane discloses this limitation.

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390. As discussed above in Section IX.A.13.d, with respect to limitation "d" of Claim 14, Kane discloses that the encircling elastic band is held in position, with respect to each interior plate-outer faceplate pair ("rigid plate"), by the integrated elastic track ("grooves") while allowing freedom for the dynamic extension and contraction of the band over the entire running length thereof. (*Id*. at 5 and 7.) The discussion of Claim 14 presented in Section IX.A.13.d is incorporated herein by reference.

391. Accordingly, in my opinion, The Kane-Beckley combination discloses this limitation of Claim 19.

e. "at least one groove additionally having at least one recess positioned outbound of the elastic band;"

392. In my opinion, the Kane-Beckley combination discloses this limitation.

393. Claim 19 does not provide antecedent basis for recitation of "at least one groove;" however, in my opinion, a POSITA would have understood the "at least one groove" to be at least one groove of the grooves of the rigid plates.

394. As discussed above in Section IX.A.1.f (with respect to limitation "f" of Claim 1) and Section IX.A.13.e (with respect to limitation "e" of Claim 14), Beckley discloses a depression **15** ("recess") in the base **2** of the wallet **5**. (Ex. 1007 at ¶¶ [0038]-[0039], and FIG. 1.) Further discussed in Section IX.A.13.e, a POSITA

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would have been motivated to form a depression ("recess"), like that disclosed by Beckley, in one or more interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, to effectuate a removably attachable money clip to facilitate user preferences/personalization, adapted uses, and/or maintenance/repair operations. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange the outer plates for greater personalization," 9-10: "without money clip," "with traditional money clip," "with spring-loaded money clip;" Ex. 1007 at ¶ [0034]: "A clip **3** in this embodiment is generally configured for holding paper currency, although it may function to hold a number of varying articles. In yet another embodiment, the clip **3** may be used to fasten the container to another object such as a pocket, personal organizer or book, for example.") The discussion of Claim 14 presented in Section IX.A.13.e is incorporated herein by reference.

395. Moreover, a POSITA would have been motivated to form the depression ("recess"), like that disclosed by Beckley, in one or more the interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, outbound the encircling elastic band ("elastic band," understood to reference the "at least one encircling elastic band") to avoid interference between the function of the depression ("recess") (*e.g.*, to capture an auxiliary feature) and the function of the elastic band

(*e.g.*, to expand and contract while enabling the wallet to have elastic volume). (Ex. 1007 FIG. 1.)

396. For example, Beckley discloses the depression **15** ("recess") as outbound a retention spring **4**, where the retention spring serves to provide expansive/contractive volumetric capacity to the wallet similar to the elastic volume provided by the encircling elastic band of Kane. (Ex. 1007, FIG. 1.) A POSITA, reading Beckley, would have realized that the depression **15** ("recess") is positioned outbound the retention spring **4** so as to avoid interference between the function of the depression **15** ("recess") and the function of the retention spring **4**. In doing so, such a POSITA would have been motivated to apply said teaching to the position of a depression ("recess"), like that disclosed by Beckley, in one or more of the interior plates; resulting in the depression ("recess") being positioned outbound the encircling elastic band.

397. A POSITA would have looked to Beckley for guidance as to the outbound positioning of the depression ("recess"), like that disclosed by Beckley, in an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, because Kane and Beckley are in the same technical field, address similar problems, utilize similar devices, and disclose methods that when combined function in the same manner as each does separately to yield predictable results, as set forth in

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Section IX.A.1.e; which is incorporated here. (Ex. 1006 at 2-5 and 8-9; Ex. 1007 at ¶¶ [0002], [0004], [0008], [0010], [0034], [0038]-[0039], and FIG. 1.)

398. In addition, A POSITA would have been motivated to form the depression ("recess"), like that disclosed by Beckley, in one or more the interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, outbound the elastic band at least because said positioning is one of a finite number of identified, predictable positions, with a reasonable expectation of success. For example, there are a finite number of locations in the interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, where a depression ("recess"), like that disclosed by Beckley, could be positioned. Further, a POSITA would have reasonably predicted that positioning a depression ("recess"), like that disclosed by Beckley, outbound the encircling elastic band, like that disclosed by Kane, would result in successful operation of both the depression ("recess") and the elastic band.

399. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 19.

f. "providing a first auxiliary feature having at least one tang;

400. In my opinion, both Kane and Beckley each disclose this limitation.

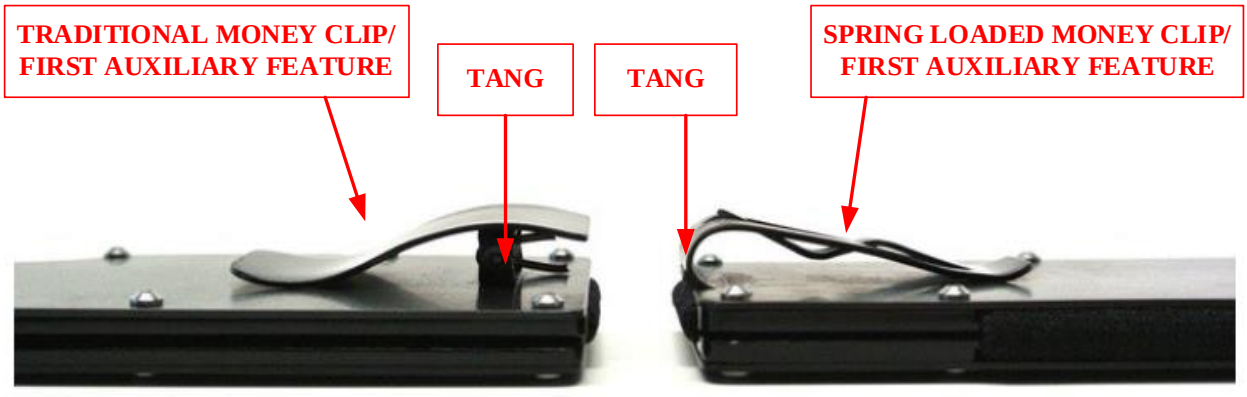
401. As discussed above in Section IX.A.13.f, with respect to limitation "f" of Claim 14, Beckley discloses a clip **3** having at least one tang. (Ex. 1007 at FIG.

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1.) The discussion of Claim 14 presented in Section IX.A.13.f is incorporated herein by reference.

402. A POSITA, reading Beckley, would have understood the clip **3** to constitute the claimed "first auxiliary feature." Further, having reviewed Beckley, a POSITA, in my opinion, would have understood that Beckley discloses "providing" the clip **3** ("auxiliary feature") to assemble the wallet **5**. (Ex. 1007 at ¶¶ [0038]-[0039].)

403. Also, Kane discloses a money clip ("auxiliary feature") having at least one tang. (Ex. 1006 at 6: The Ridge 2 is available with two different types of money clips or without a clip.") A POSITA, reading Kane, would have understood the money clip to constitute the claimed "first auxiliary feature." For example, Kane discloses the following photograph depicting the money clip ("auxiliary feature") and the tang thereof.



(*Id*. (*annotated*))

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404. Having reviewed Kane, a POSITA, in my opinion, would have understood that Kane discloses "providing" the money clip ("auxiliary feature") to assemble the wallet.

405. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 19.

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

406. In my opinion, the Kane-Beckley combination discloses this limitation.

407. Beckley discloses removably inserting the tang of a clip **3** ("auxiliary feature") into a depression **15** ("recess") to make the clip **3** ("auxiliary feature") available to an outside face of the wallet. (Ex. 1007 at ¶ [0038]: "The clip **3** is assembled to the base **2** by inserting the clip **3** into a depression **15**," and FIG. 2B.)

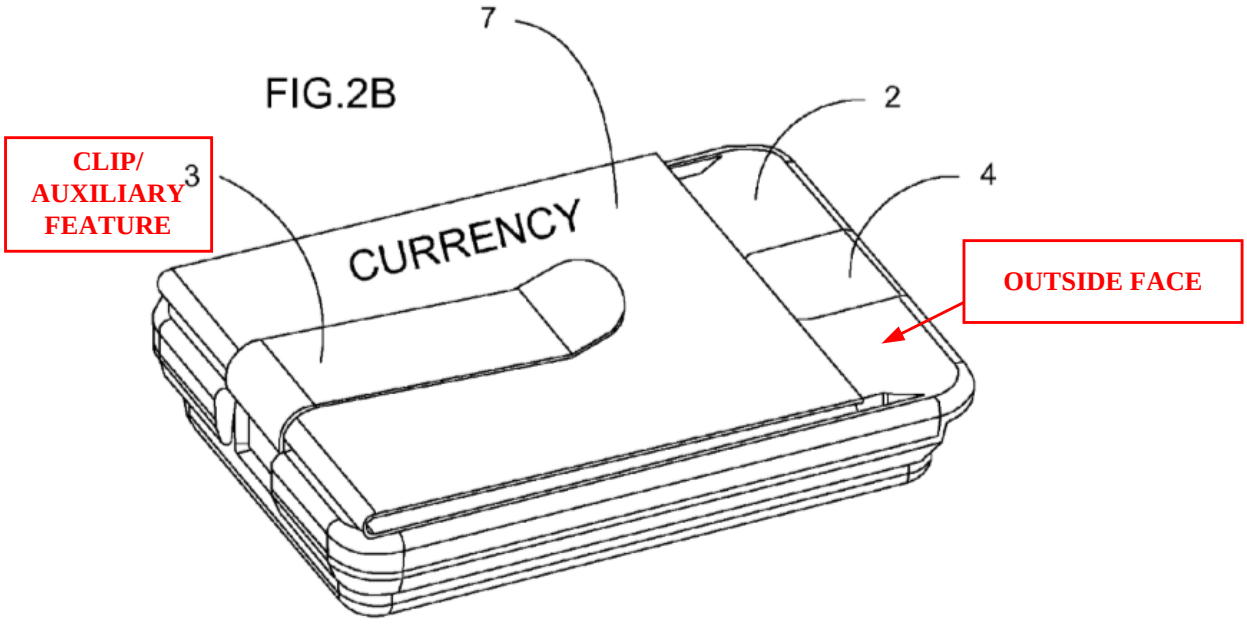
408. A POSITA, reading Beckley, would have understood that the tang of the clip **3** ("auxiliary feature") is removably inserted into the depression **15** ("recess") at least because removing the clip **3** ("auxiliary feature") can be readily accomplished by unseating the barbs **13** from the cavities **14**. For instance, the container **1** can be slid off the base **2** (as shown in FIG. 1) to access and displace the barbs **13**.

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409. To the extent that Beckley is found not to disclose making the clip **3** ("auxiliary feature") available at an outside face of at least one rigid plate; a POSITA would have been motivated to insert, removably, the tang of an initial money clip ("first auxiliary feature") into a depression ("recess"), like that disclosed by Beckley, formed inside an interior plate-outer faceplate pair ("rigid plate") of a wallet, like that disclosed by Kane, to effectuate a removable clip that advances the personalization, adapted use, and/or maintenance operations described herein. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange the outer plates for greater personalization," 9-10: "without money clip… with traditional money clip… with spring-loaded money clip;" Ex. 1007 at ¶ [0034]: "A clip **3** in this embodiment is generally configured for holding paper currency, although it may function to hold a number of varying articles. In yet another embodiment, the clip **3** may be used to fasten the container to another object such as a pocket, personal organizer or book, for example.")

In doing so, such a POSITA would make the initial money clip ("first auxiliary feature") available to the outside face of the interior plate-outer faceplate pair ("rigid plate") in accordance with the common operation of a money clip (*e.g.*, as evidenced by Kane and Beckley both disclosing money clips made available to the outside of

the respective wallets). (Ex. 1006 at 6-7; Ex. 1007 at ¶¶ [0038]-[0039], and FIGS. 2B, 4A-4B, 5A-5B, 6A-6B, and 7D.) For example:



(Ex. 1007 at FIG. 2B (*annotated*).)

410. In attaching an initial money clip ("first auxiliary feature") to one or more of the interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, by inserting a tang of the initial money clip ("first auxiliary feature") into a depression ("recess"), like that disclosed by Beckley, a POSITA would be using a known technique to improve similar devices in the same way. The technique of configuring compact wallets by removably inserting a tang of a money clip ("auxiliary feature") into a depression ("recess") of the wallet was within the realm of ordinary capabilities of a POSITA based upon the teachings of at least Beckley. (Ex. 1007 at ¶¶ [0038]-[0039], and FIG. 1.) Further, a POSITA would have been

capable of applying this known method of configuring the compact wallet of Kane to yield predictable results.

411. Further, a POSITA would have good reason to incorporate the teachings of Beckley into Kane with a reasonable expectation of success at least because Kane and Beckley are in the same technical field, address similar problems, utilize similar devices, and disclose methods that when combined function in the same manner as each does separately to yield predictable results, as set forth in Section IX.A.1.e; which is incorporated here. (Ex. 1006 at 2-5 and 8-9; Ex. 1007 at ¶¶ [0002], [0004], [0008], [0010], [0034], [0038]-[0039], and FIG. 1.). In doing so, the POSITA would apply a known technique to a known device ready for improvement to yield predictable results.

412. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 19.

h. "removing, selectively, the first auxiliary feature;"

413. In my opinion, the Kane-Beckley combination discloses this limitation.

414. A POSITA, reading Beckley, would have been motivated to selectively remove the initial money clip ("first auxiliary feature"), like that disclosed by Beckley, from the wallet to replace the initial money clip ("first auxiliary feature") with another. For instance, a POSITA would have understood that a primary feature

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of rendering a clip **3** ("auxiliary feature") removable is the ability to swap the clip **3** ("auxiliary feature") for another if, for example, the clip **3** ("auxiliary feature") is damaged or a new clip **3** ("auxiliary feature") is desired. In other words, a POSITA would be motivated to remove a removably attached money clip as doing so would be an exercise in the clip's intended function (i.e., the clip is removably attached so that it can be removed).

415. Moreover, a POSITA, reading Kane, would have been motivated to selectively remove a removable initial money clip ("first auxiliary feature"), like that disclosed by Beckley, to advance the wallet personalization promoted by Kane and/or to remove the money clip when not needed in accordance with the minimalist philosophy in the field of art. (Ex. 1006 at 2-3.) (Ex. 1006 at 9-10: "without money clip… with traditional money clip… with spring-loaded money clip;" Ex. 1007: "Certain embodiments of the invention include an exterior clip….")

416. For example, Kane discloses wallets with and without money clips; thereby, demonstrating an apparent demand for various configurations to meet consumer preferences and/or uses. A POSITA would have been motivated to alter the configuration of a compact wallet by removing a removably attached initial money clip ("first auxiliary feature") to make a wallet that meets one or more user preferences. (Ex. 1006 at 9-10: "without money clip," "with traditional money clip," "with spring-loaded money clip," and photographs thereof.)

417. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 19.

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

418. In my opinion, both Kane and Beckley each disclose this limitation.

419. As discussed above in Section IX.A.18.f, both Kane and Beckley each disclose providing a money clip ("auxiliary feature") having at least one tang. (Ex. 1006 at 6-7 and 10-15; Ex. 1007, FIG. 1.) The discussion presented in Section IX.A.18.f is incorporated herein by reference.

420. Further, as discussed above in Section IX.A.18.h, a POSITA, reading Kane and/or Beckley, would have been motivated to replace an initial money clip ("first auxiliary feature") with a substitute money clip ("second auxiliary feature") to personalize the wallet, adapt the wallet to a given use preference, and/or perform a maintenance/repair operation. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange the outer plates for greater personalization," 9-10: "without money clip," "with traditional money clip," "with spring-loaded money clip;" Ex. 1007 at ¶ [0034]: "A clip **3** in this embodiment is generally configured for holding paper currency, although it may function to hold a number of varying articles. In yet another

embodiment, the clip **3** may be used to fasten the container to another object such as a pocket, personal organizer or book, for example.")

421. In doing so, such a POSITA would be exercising the functionality inherent to a removably attached money clip to promote one or more objectives suggested by Kane. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange the outer plates for greater personalization.") Further, the substitute money clip ("second auxiliary feature") would be a mere duplication of the initial money clip ("first auxiliary feature") without any new or unexpected results.

422. Thus, a POSITA would have understood a substitute money clip, like the money clip disclosed by Kane or the clip **3** disclosed by Beckley, to constitute the claimed "second auxiliary feature."

423. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of claim 19.

j. "inserting, removably, the at least one tang of the second auxiliary feature into the at least one recess to make the second auxiliary feature available at an outside face of at least one of the two rigid plates,"

424. In my opinion, the Kane-Beckley combination discloses this limitation.

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425. As discussed above in Section IX.A.18.g, Beckley discloses inserting, removably, the tang of a clip **3** ("auxiliary feature") into a depression **15** ("recess"). Further, a POSITA would have been motivated to insert, removably, the tang of a clip ("auxiliary feature") into a depression ("recess"), like that disclosed by Beckley, formed inside an interior plate-outer faceplate pair ("rigid plate") of a wallet, like that disclosed by Kane, to effectuate a removable clip that advances the personalization, adapted use, and/or maintenance operations described herein. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 7: photographs thereof, 9-10: "without money clip… with traditional money clip… with spring-loaded money clip," and photographs thereof, 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences;" Ex. 1007 at ¶ [0034]: "A clip **3** in this embodiment is generally configured for holding paper currency, although it may function to hold a number of varying articles. In yet another embodiment, the clip **3** may be used to fasten the container to another object such as a pocket, personal organizer or book, for example.")

426. In doing so, such a POSITA would make the initial clip ("first auxiliary feature") available to the outside face of the interior plate-outer faceplate pair ("rigid plate") in accordance with the common operation of a clip (*e.g.*, as evidenced by Kane and Beckley both disclosing clips made available to the outside of the

respective wallets). (Ex. 1006 at 6-7; Ex. 1007, FIGS. 2B, 4A-4B, 5A-5B, 6A-6B, and 7D.) The discussion in Section IX.A.18.g is incorporated herein by reference.

427. Further, as discussed above in Section IX.A.18.h, a POSITA, reading Kane and/or Beckley, would have been motivated to replace an initial money clip ("first auxiliary feature") with a substitute money clip ("second auxiliary feature") to personalize the wallet, adapt the wallet to a given use preference, and/or perform a maintenance/repair operation. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 7: photographs thereof, 9-10: "without money clip… with traditional money clip… with spring-loaded money clip," and photographs thereof, 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences;" Ex. 1007 at ¶ [0034]: "A clip **3** in this embodiment is generally configured for holding paper currency, although it may function to hold a number of varying articles. In yet another embodiment, the clip **3** may be used to fasten the container to another object such as a pocket, personal organizer or book, for example.")

428. In doing so, such a POSITA would be exercising the functionality inherent to a removably attached money clip to promote one or more objectives suggested by Kane. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange the outer

plates for greater personalization.") Further, insertion of the substitute money clip ("second auxiliary feature") would be a mere duplication of the previous insertion step of the initial money clip ("first auxiliary feature") without any new or unexpected results.

429. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of claim 19.

k. "the at least one recess having an undercut operable to engage a hook of the tang to prevent inadvertent dislodgement of the second auxiliary feature from the at least one recess,"

430. In my opinion, the Kane-Beckley combination discloses this limitation.

431. Limitation "k" of Claim 19 does not delineate whether the "tang" is the tang of the first auxiliary feature or the tang of the second auxiliary feature. In my opinion, a POSITA would have understood the "tang" recited in limitation "k" of Claim 19 to be the tang of the second auxiliary feature given that said tang is claimed to prevent inadvertent dislodgement of the second auxiliary feature.

432. As discussed above in Section IX.A.13.g, with respect to limitation "g" of Claim 14, Beckley discloses a depression **15** ("recess") having one or more cavities **14** ("undercut") operable to mate ("engage") with one or more barbs **13** ("hook") of the tang to prevent inadvertent dislodgement of the clip **3** ("auxiliary feature") from the depression **15** ("recess"). (Ex. 1007 at ¶¶ [0038]-[0039], and FIG.

1.) A POSITA, reading Beckley, would have understood one or more of the barbs **13** to constitute the claimed "hook," and one or more of the cavities **14** to constitute the claimed "undercut."

433. Also discussed above in Section IX.A. 13.g, with respect to limitation "g" of Claim 14, a POSITA would have looked to Beckley for guidance on how to removably attach a money clip, such as a substitute money clip ("second auxiliary feature"), to a compact wallet, like that disclosed by Kane, via a barb ("hook") and cavity ("undercut") engagement in a depression ("recess"), like that disclosed by Beckley, because Beckley and Kane are in the same technical field, address similar problems, utilize similar devices, and disclose structural features that, when combined, function in the same manner as each does separately to yield predictable results, as set forth in Section IX.A.1.e; which is incorporated here. (Ex. 1006 at 2-5 and 8-9; Ex. 1007 at ¶¶ [0002], [0004], [0008], [0010], [0034], [0038]-[0039], and FIG. 1.) In doing so, a POSITA would be using a known technique to improve similar devices in the same way.

434. Having reviewed Beckley, such a POSITA would have been motivated to removably attach a money clip, such as a substitute money clip ("second auxiliary feature"), via a barb ("hook") and cavity ("undercut") engagement in a depression ("recess"), like that disclosed by Beckley, to an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, to provide a compact wallet that allows

a consumer to remove the substitute money clip ("second auxiliary feature") when not needed, in accordance with the minimalist preferences inherent to the compact wallet marketplace. (Ex. 1006 at 9-10: "without money clip," "with traditional money clip," "with spring-loaded money clip;" Ex. 1007: "Certain embodiments of the invention include an exterior clip….") Moreover, a POSITA would have had good reason to incorporate the teachings of Beckley into Kane, as discussed above, with a reasonable expectation of success to advance the maintenance operations promoted by Kane. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange the outer plates for greater personalization.")

435. The discussion of Claim 14 presented in Section IX.A.13.g is incorporated herein by reference.

436. Accordingly, in my opinion, The Kane-Beckley combination discloses this limitation of Claim 19.

l. "the hook extending at an angle to the tang,"

437. In my opinion, the Kane-Beckley combination discloses this limitation.

438. Limitation "l" of Claim 19 does not delineate whether the "tang" is the tang of the first auxiliary feature or the tang of the second auxiliary feature. In my opinion, a POSITA would have understood the "tang" recited in limitation "l" of Claim 19 to be the tang of the second auxiliary feature given that antecedent basis

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for the "hook" is provided in limitation "k" of Claim 19, which in turn is understood to address the tang of second auxiliary feature.

439. As discussed above in Sections IX.A.1.h and IX.A.13.h, with respect to limitation "h" of Claim 1 and limitation "h" of Claim 14, Beckley discloses one or more barbs **13** ("hook") extending at an angle to the tang of the clip **3** ("auxiliary feature"). (Ex. 1007, FIG. 1.) The discussions of Claim 1 presented in Section IX.A.1.h and of Claim 14 presented in Section IX.A.13.h are incorporated herein by reference.

440. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 19.

m. "the at least one recess receiving the tang being disposed inside at least one of the two rigid plates;"

441. In my opinion, the Kane-Beckley combination discloses this limitation.

442. As discussed above in Sections IX.A.1.f and IX.A.13.e, with respect to limitation "f" of Claim 1 and limitation "e" of Claim 14, Beckley discloses a depression **15** ("recess") formed inside a base **2** of the wallet **5**. (Ex. 1007 at ¶¶ [0038]-[0039], and FIG. 1.)

443. To the extent it were found that Beckley does not disclose the depression **15** ("recess") is formed inside a rigid plate, a POSITA would have been motivated to form a depression ("recess"), like that disclosed by Beckley, inside an

interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, to effectuate the removable attachment of a money clip, such as an initial money clip ("first auxiliary feature") and/or a substitute money clip ("second auxiliary feature"), because Kane and Beckley are in the same technical field, address similar problems, utilize similar devices, and disclose methods that when combined function in the same manner as each does separately to yield predictable results, as set forth in Section IX.A.1.e; which is incorporated here. (Ex. 1006 at 2-5 and 8-9; Ex. 1007 at ¶¶ [0002], [0004], [0008], [0010], [0034], [0038]-[0039], and FIG. 1.) In doing so, the POSITA would apply a known technique to a known device ready for improvement to yield predictable results.

444. Such a POSITA would have been motivated to form a depression ("recess"), like that disclosed by Beckley, inside an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, to provide a removably attachable money clip while minimizing the profile of the wallet, which is described as a "core design" feature by Kane. (Ex. 1006 at 3: "Core Design: Low profile to easily fit in your front pocket.")

445. For example, a POSITA would be motivated to form a depression ("recess"), like that disclosed by Beckley, in an interior plate of an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, to effectuate the removable attachment of a clip ("auxiliary feature"), such as an initial money clip

("first auxiliary feature") and/or a substitute money clip ("second auxiliary feature"), to a compact wallet. Moreover, forming a depression ("recess), like that disclosed by Beckley, in an interior plate, like that disclosed by Kane, would be a mere continuation of one or more milling operations conducted to form the integrated elastic track ("grooves"). As such, forming a depression ("recess"), like that disclosed by Beckley, in an interior plate of a compact wallet, like that disclosed by Kane, would not require any additional machinery to manufacture, and minimal additional costs, if any. Such milling operations are routine and very familiar to a POSITA at the time of the Critical Date.

446. The discussions of Claim 1 presented in Section IX.A.1.f and of Claim 14 presented Section IX.A.13.e are incorporated herein by reference.

447. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 19.

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

448. In my opinion, Kane discloses this limitation.

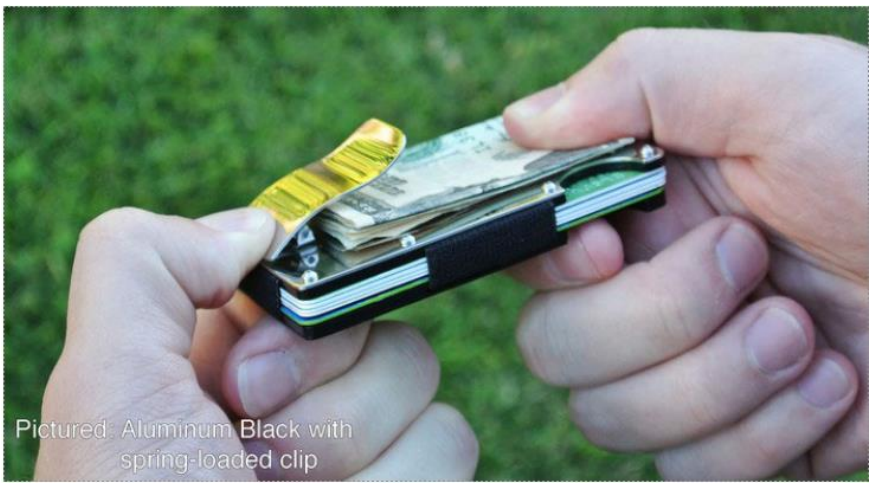
449. As discussed above in Sections IX.A.1.j and IX.A.13.i, with respect to limitations "j" of Claim 1 and limitation "i" of Claim 14, Kane discloses a compact

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wallet that carries card-like contents on a person with minimal silhouette while allowing expandable capacity and ready access to individual contents positioned interiorly to the two interior plate-outer faceplate pairs ("rigid plates"). (Ex. 1006 at 2-5.) The discussions of Claim 1 presented in Section IX.A.1.j and of Claim 14 presented in Section IX.A.13.i are incorporated herein by reference.

450. In my opinion, a POSITA reading limitation "n" of Claim 19 would understand recitation of "proving additional functionality" to be a grammatical error, and that limitation "n" of Claim 19 means to recite "providing additional functionality."

451. Further, Kane discloses a money clip ("at least one auxiliary feature") that is positioned exterior to the interior plates ("rigid plates") and provides additional functionality. For example, Kane discloses the following photograph depicting the money clip ("at least one auxiliary feature") securing paper currency to the outside of the wallet.



(Ex. 1006 at 4.)

452. Likewise, Beckley discloses a clip **3** ("at least one auxiliary feature") that is positioned on the exterior of the wallet and provides additional functionality. (Ex. 1007 at ¶ [0034]: "A clip **3** in this embodiment is generally configured for holding paper currency, although it may function to hold a number of varying articles. In yet another embodiment, the clip **3** may be used to fasten the container to another object such as a pocket, a personal organizer or book, for example.")

453. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 19.

19. Claim 20

a. "The method of claim 19, wherein the at least one recess has an undercut and the at least one tang has a hook,"

454. In my opinion, the Kane-Beckley combination discloses this limitation.

455. As set forth above, the Kane-Beckley combination discloses each and every limitation of Claim 19, and said discussion is incorporated herein by reference.

456. In my opinion, limitation "a" of Claim 20 is at least partially duplicative of limitation "k" of Claim 19. For example, a POSITA would understand "the at least one recess has an undercut," as recited in limitation "a" of Claim 20, to be equivalent to recitation of "the at least one recess having an undercut," as recited in

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limitation "k" of Claim 19. The discussion of Claim 19 presented in Section IX.A.18.k, is incorporated herein by reference.

457. Further, limitation "a" of Claim 20 fails to delineate whether "the at least one tang" is of the first auxiliary feature or of the second auxiliary feature. However, in my opinion, a POSITA would understand "the at least one tang" recited in limitation "a" of Claim 20 to be of the first auxiliary feature; otherwise, limitation "a" of Claim 20 would be duplicative of limitations "i" and/or "j" of Claim 19.

458. Moreover, as discussed above in Section IX.A.1.g, Section IX.A.13.g, and Section IX.A.18.k, Beckley discloses one or more barbs **13** ("hook") on a tang of a clip **3**. (Ex. 1007 at ¶¶ [0038]-[0039] and FIG. 1.). The following discussions are incorporated herein by reference: the discussion of Claim 1 presented in Section IX.A.1.g; the discussion of Claim 14 presented in Section IX.A.13.g; and the discussion of Claim 19 presented in Section IX.A.18.k.

459. A POSITA, reading Kane and/or Beckley, would have understood an initial money clip ("first auxiliary feature") would have included one or more barbs ("hook"), like that disclosed by Beckley. In doing so, the initial money clip ("first auxiliary feature") and substitute money clip ("second auxiliary feature") would merely be duplicative parts interchangeable without any new or unexpected results.

460. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 20.

b. "the hook and undercut interpositioned to secure the at least one auxiliary feature against inadvertent dislodgement."

461. In my opinion, the Kane-Beckley combination discloses this limitation.

462. Limitation "b" of Claim 20 fails to delineate whether "the hook" is the hook of the tang of the first auxiliary feature or the hook of the tang of the second auxiliary feature. However, in my opinion, a POSITA would understand "the hook" recited in limitation "b" of Claim 20 to be the hook of the tang of the first auxiliary feature; otherwise, limitation "b" of Claim 20 would be duplicative of limitation "k" of Claim 19.

463. As discussed in Section IX.A.1.i, Section IX.A.13.g, and Section IX.A.18.k, a POSITA, reading Beckley, would have understood the mating of the barbs **13** ("hook") and cavities **14** ("undercut") to constitute an interpositioned arrangement that secures the associated auxiliary feature against inadvertent dislodgement. The following discussions are incorporated herein by reference: the discussion of Claim 1 presented in Section IX.A.1.i; the discussion of Claim 14 presented in Section IX.A.13.g; and the discussion of Claim 19 presented in Section IX.A.18.k.

464. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 20.

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20. Claim 21

a. "The method of claim 20, wherein at least one of the auxiliary features is a money clip."

465. In my opinion, both Kane and Beckley each disclose this limitation.

466. As set forth above, the Kane-Beckley combination discloses each and every limitation of Claim 20, and said discussion is incorporated herein by reference.

467. In my opinion, a POSITA would understand recitation of "at least one of the auxiliary features" to mean at least one of the first auxiliary feature and/or the second auxiliary feature. Beckley discloses that the clip **3** ("first auxiliary feature" and/or "second auxiliary feature") is a money clip. (Ex. 1007 at ¶ [0034]: "A clip **3** in this embodiment is generally configured for holding paper currency….") Likewise, Kane discloses a "traditional money clip" and a "spring-loaded money clip." (Ex. 1006 at 4.)

468. Accordingly, in my opinion, the Kane-Beckley combination discloses this limitation of Claim 21.

B. Ground 2: Claims 1-9 and 11-21 of the '808 Patent are rendered obvious under 35 U.S.C. §103 (post-AIA) by Kane in view of U.S. Patent No. 2,326,558 to Alfred E. Pelz ("Pelz").

469. In my opinion, the Kane-Pelz combination discloses as a whole Claims 1-9 and 11-21 of the '808 Patent.

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1. Claim 1

a. "A compact wallet, comprising:"

470. I understand that a preamble of a claim is generally not limiting unless it gives life and meaning to a claim or provides necessary antecedent basis for terms appearing later in the claim.

471. This preamble recites the structural limitation, "compact wallet"; which is referenced later in the claim as "wallet". Even if the preamble were to be interpreted as limiting, in my opinion any limitation that may be found in the preamble is disclosed by Kane.

472. Kane discloses wallets that are compact. (Ex. 1006 at 2: "an extremely thin wallet that isn't limited in its capacity," and at 3: "[l]ow profile to easily fit in your front pocket.")

473. A POSITA reading Kane would understand that an extremely thin wallet that can fit in a front pants pocket constitutes a "compact wallet."

474. Accordingly, in my opinion, the Kane-Pelz combination discloses the preamble of Claim 1.

b. "at least two rigid plates interposed to sandwich card-like contents there between, each rigid plate having a longitudinal extent;"

475. In my opinion, Kane discloses this limitation.

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476. I explained earlier in Section IX.A.1.b that this limitation is disclosed by Kane. For example, a POSITA, reading Kane, would have understood the two interior plate-outer faceplate pairs to constitute the "at least two rigid plates." The discussion of Claim 1 presented in Section IX.A.1.b is incorporated herein by reference.

477. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 1.

c. "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;"

478. In my opinion, Kane discloses this limitation.

479. I explained earlier in Section IX.A.1.c that this limitation is disclosed by Kane. The discussion of Claim 1 presented in Section IX.A.1.c is incorporated herein by reference.

480. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 1.

d. "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"

481. In my opinion, Kane discloses this limitation.

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482. I explained earlier in Section IX.A.1.d that this limitation is disclosed by Kane. For example, a POSITA, reading Kane, would have understood the integrated elastic track to constitute the claimed "channeling means." The discussion of Claim 1 presented in Section IX.A.1.d is incorporated herein by reference.

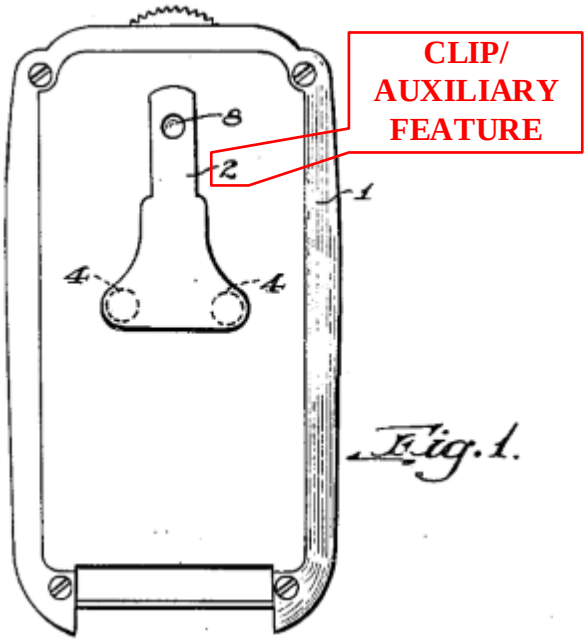
483. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 1.

e. "an auxiliary feature removably attached to at least one of the at least two rigid plates,"

484. In my opinion, the Kane-Pelz combination discloses this limitation.

485. I explained earlier in Section IX.A.1.e that Kane discloses a money clip ("auxiliary feature") attached to at least one of the interior plate-outer faceplate pairs ("rigid plates"). The discussion of Claim 1 presented in Section IX.A.1.e is incorporated herein by reference.

486. Similarly, Pelz discloses a clip **2** serving as an auxiliary feature. (Ex. 1008 at 1:2-3, 1:28-2:7, 2:25-27, 3:72-4:15, and FIGS. 1 and 8.) A POSITA, reading Pelz, would have understood the clip **2** to constitute the claimed "auxiliary feature." (*Id*. at 2:25-28: "Attached to the back of the case is a clip **2** for detachably fastening the case to the clothing of a person who wears the hearing aid.") For example, FIG. 1 depicts an example perspective of the clip **2** ("auxiliary feature").



(Id. at FIG. 1 (*annotated*).)

487. Further, Pelz discloses that the clip **2** ("auxiliary feature") is removably attached to the case. (*Id*. at 1:22-27: "a clip that lies close to the case… and which is readily detachable from the case," and 1:41-43: "under manual pressure, the clip is movable vertically out of position so that it can be disengaged from the case.")

488. In my opinion, to the extent it were found that Kane does not disclose a clip ("auxiliary feature") as removably attached, a POSITA would have looked to Pelz for guidance on how to removably attach a clip ("auxiliary feature") to one or more of the interior plate-outer faceplate pairs ("rigid plates") because Pelz and Kane are in similar technical fields, address similar problems, utilize similar devices, and

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disclose structural features that, when combined, function in the same manner as each does separately to yield predictable results.

489. Kane and Pelz both disclose innovations in the field of compact devices worn on one's person. (Ex. 1006 at 2: "re-designed wallet system," "providing an extremely thin wallet," 3: "low profile to easily fit in your front pocket;" Ex. 1008 at 1:6-8: "a clip attached to its case for holding it in position in a pocket or in some other location on the clothing of the user of the instrument.")

490. Kane and Pelz both address problems associated with bulkiness of compact, wearable devices. (Ex. 1006 at 2: "The Ridge 2.0 [is] Designed to be an encompassing alternative to a bulky traditional leather wallet," 8: "the Ridge is slim enough to keep in your front pocket…;" Ex. 1008 at 1:9-12: "clips often project a considerable distance from the case and therefore add undesirably to the thickness of the unit or press uncomfortably against the wearer.")

491. Kane and Pelz both utilize clips to provide a compact device with additional functionality. (Ex. 1006 at 3: "improved traditional money clip design," "designed additional money clip with an internal spring (spring-loaded), 7: photographs thereof, 10-11: photographs thereof; Ex. 1008 at 1:1-4: "This invention relates to… the clips by which such units are attached to the garments of the wearer," FIGS. 1-2 and 8.) For example, Kane discloses the use of a "spring-loaded" clip attached to the compact wallet. (Ex. 1006 at 4: "designed additional money clip with

an internal spring (spring-loaded). Further, Kane discloses multiple photographs, such as the photograph below, depicting the "spring-loaded" clip as a leaf spring clip.



(*Id*. at 7 (*annotated*).)

492. Likewise, Pelz discloses a compact case that utilizes a spring-loaded auxiliary clip. (Ex. 1008 at 2:39-45: "The upper end of the clip is spaced from the case by a U-shaped leaf spring that presses the contact buttons against the case, as shown in FIG. 2. The spring is made from a flat strip of spring steel that is bent transversely to form two arms connected at their lower ends by an integral U-shape bend.")

493. Further, the interior plate-outer faceplate pairs ("rigid plates") disclosed by Kane function to secure the card-like contents of the wallet and provide RFID protection. (Ex. 1006 at 3: "block RFID-skimming devices," "accommodate a

various number of cards," 5: "[t]he Integrated Elastic Track can expand up to 12 cards and then immediately contract to hold a single card securely," photographs thereof, 8: "top of the inner plates are tapered to let you easily slide additional cards into the wallet," "The Ridge's aluminum interior plates block RFID, keeping your information safe.") The removably attached clip ("auxiliary feature") disclosed by Pelz enables a compact device carried on one's person to be held "in a pocket or in some other location on the clothing of the user of the instrument." (Ex. 1008 at 1:6-8.) When combined, the interior plate-outer faceplate pairs ("rigid plates") continue to secure the card-like contents in a predictable fashion, and the removably attached clip ("auxiliary feature") continues to provide a fastening means to garments.

494. Moreover, a POSITA seeking to render the spring-loaded clip ("auxiliary feature") disclosed by Kane removable would be motivated to look for other compact devices that utilize removable spring-loaded clips, such as Pelz. For example, in my opinion, Pelz is reasonably pertinent to one or more problems faced by the inventor of the '808 Patent. For instance, the '808 Patent describes that an objective of the inventor was to provide a compact wallet with an auxiliary feature that can be modularly exchanged. (Ex. 1001 at 2:37-40.) Pertinent to this objective, Pelz discloses a spring-loaded clip, similar to spring-loaded clips known to be utilized with compact wallets, that is removable (*i.e.*, modular). (Ex. 1008 at 1:12-13: "It generally is desirable to make the clips detachable so that the case can be used

without them," 1:20-27: "It is among the objects of this invention to provide… a clip that lies close to the case… and which is readily detachable from the case.") Additionally, the '808 Patent identifies an "unfulfilled need" for "a compact wallet which would be minimally dimensioned to the prototypical credit card profile. Such a compact wallet would be void of any potentially snagging structural appendages…." (Ex. 1001 at 2:1-5.) Pertinent to this "unfulfilled need," Pelz discloses a clip **2** that "lies close to the case, which has little tendency to catch on the clothing." (Ex. 1008 at 1:22-23.)

495. In applying the teachings of Pelz to render a clip, like that disclosed by Kane, removable, a POSITA would be using a known technique to improve similar devices in the same way. The technique of configuring a compact device (to be carried on one's person) with an attached clip ("auxiliary feature") that is removable was within the realm of ordinary capabilities of a POSITA based upon the teachings of at least Pelz. (Ex. 1008 at 1:12-14: "it desirable to make the clips detachable so that the case can be used without them," 1:22-27: "a clip that lies close to the case, which has little tendency to catch on the clothing… and which is readily detachable from the case," FIGS. 1-2 and 8.) Further, a POSITA would have been capable of applying this known method of configuring the compact wallet of Kane to yield predictable results. (Ex. 1006 at 4: "improved traditional money clip design…

designed additional money clip with an internal spring (spring-loaded),” photographs thereof.)

496. Having reviewed Pelz, such a POSITA would have been motivated to removably attach a clip (“auxiliary feature”), like that disclosed by Pelz, to one or more interior plate-outer faceplate pairs (“rigid plates”), like that disclosed by Kane, to provide a compact wallet that allows a consumer to remove the clip (“auxiliary feature”) when not needed, in accordance with the minimalist preferences inherent to the compact wallet marketplace. (Ex. 1006 at 6: “The Ridge 2 is available with two different types of money clips or without a clip,” 7: photographs thereof, 9-10: “without money clip… with traditional money clip… with spring-loaded money clip,” and photographs thereof, 15-16: “Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences.”) For example, Pelz articulates numerous advantages to rendering an auxiliary clip removable. (Ex. 1008 at 1:9-14: “Such clips often project a considerable distance from the case and therefore add undesirably to the thickness of the unit or press uncomfortably against the wearer. It generally is desirable to make the clips detachable so that the case can be used without them….”)

497. Moreover, a POSITA would have had good reason to incorporate the teachings of Pelz into Kane, as discussed above, with a reasonable expectation of success to advance the maintenance operations promoted by Kane. For example,

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Kane discloses turning a wallet "into a 'system' that can be completely disassembled by the user to replace the elastic and exchange outer plates for greater personalization." (Ex. 1006 at 3.) Rendering a clip ("auxiliary feature") removable, as disclosed by Pelz, advances the disassembly and personalization of the wallets, as suggested by Kane. (Ex. 1006 at 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences.")

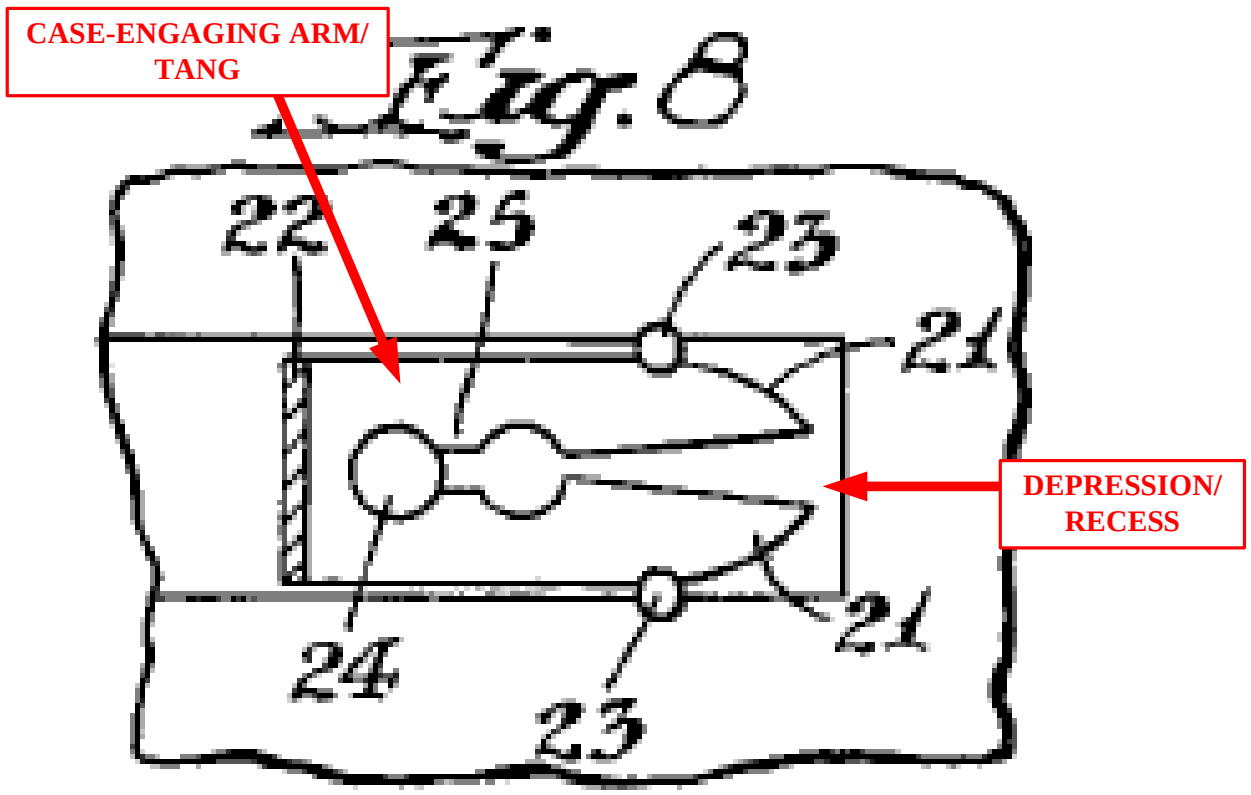
498. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 1.

f. "the auxiliary feature having a tang insertable into a recess formed inside the at least two rigid plates,"

499. In my opinion, the Kane-Pelz combination discloses this limitation.

500. Pelz discloses a clip **2** ("auxiliary feature") having a case-engaging arm **10** ("tang") that is inserted into a depression **19** ("recess") formed inside the case. (Ex. 1008 at 2:54 – 3:3: "To detachably connect the spring to the case the case-engaging arm **10** of the spring is provided near its lower end…," *Id*. at 3:61-66: "It is preferred to provide the case with a rectangular depression **19** for the spring that serves the double purpose of a guide for the spring in attaching it to the case and a recess for the arm **10** so that the spring and stud and pin will not project from the case any farther than necessary.")

501. For example, Pelz's FIG. 8 depicts an embodiment of the clip **2** ("auxiliary feature") having a case-engaging arm **10** ("tang") insertable into a depression **19** ("recess") formed inside the case **1**.



(*Id*. at FIG. 8 (*annotated*).)

502. In my opinion, a POSITA, reading Pelz, would have understood the depression **19** to constitute the claimed "recess." For example, Pelz's depression **19** is a groove having a sidewall that is adjacent to a longitudinally extending groove (*e.g.*, adjacent to the interior cavity of the case). Additionally, Pelz understood the depression **19**, which receives the case-engaging arm **10** ("tang") of the clip **2**, is a

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surface groove or depression that defines an indentation occurring in a surface of the case **1**.

503. Further, to the extent it were found that Pelz does not disclose a recess formed inside a rigid plate, a POSITA would have been motivated to form a depression ("recess"), like that disclosed by Pelz, inside one or more of the interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, to effectuate the removable attachment of a clip ("auxiliary feature"), like that disclosed by Pelz and discussed above, because Kane and Pelz are in a similar technical field, address similar problems, utilize similar devices, and disclose methods that when combined function in the same manner as each does separately to yield predictable results, as set forth in Section IX.B.1.e; which is incorporated here. (Ex. 1006 at 2-3, 5, 7-8, 10-11, and photographs thereof; Ex. 1008 at 1:1-4, 1:6-12, 2:39-45, FIGS. 1-2 and 8.) In doing so, the POSITA would apply a known technique to a known device ready for improvement to yield predictable results.

504. For example, a POSITA would be motivated to form a depression ("recess"), like that disclosed by Pelz, in an interior plate of an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, to effectuate the removable attachment of a clip ("auxiliary feature") to compact wallet. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 15-16: "Our biggest challenge is conveying our idea and creating a product that is

versatile enough to suit a wide range of people and preferences;" Ex. 1008 at 1:20-27, 1:41-43, 3:72-4:15, FIGS. 1-2 and 8.) Moreover, forming a depression ("recess), like that disclosed by Pelz, in an interior plate of an interior plate-outer faceplate pair, like that disclosed by Kane, would be a mere continuation of one or more milling operations conducted to form the integrated elastic track ("channeling means"). As such, forming a depression ("recess"), like that disclosed by Pelz, in an interior plate of a compact wallet, like that disclosed by Kane, would not require any additional machinery to manufacture, and minimal additional costs, if any. Such milling operations are routine and very familiar to a POSITA at the time of the Critical Date.

505. Additionally, such a POSITA would have been motivated to form a depression ("recess"), like that disclosed by Pelz, inside an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, to provide a removably attachable clip ("auxiliary feature") while minimizing the profile of the wallet, which is described as a "core design" feature by Kane, and minimize a tendency of the clip to snag on clothing, which is described as an advantage by Pelz. (Ex. 1006 at 3: "Core Design: Low profile to easily fit in your front pocket;" Ex. 1008 at 1:20-23: "It is among the objects of this invention to provide… a clip… which has little tendency to catch on the clothing….") For example, said motivation is buttressed by Pelz's teachings that "[i]t is preferred to provide the case with a rectangular

depression **19** for the spring that serves the double purpose of a guide for the spring in attaching it to the case and a recess for the arm **10** so that the spring and stud and pin will not project from the case any farther than necessary." (Ex. 1008 at 3:61-66.)

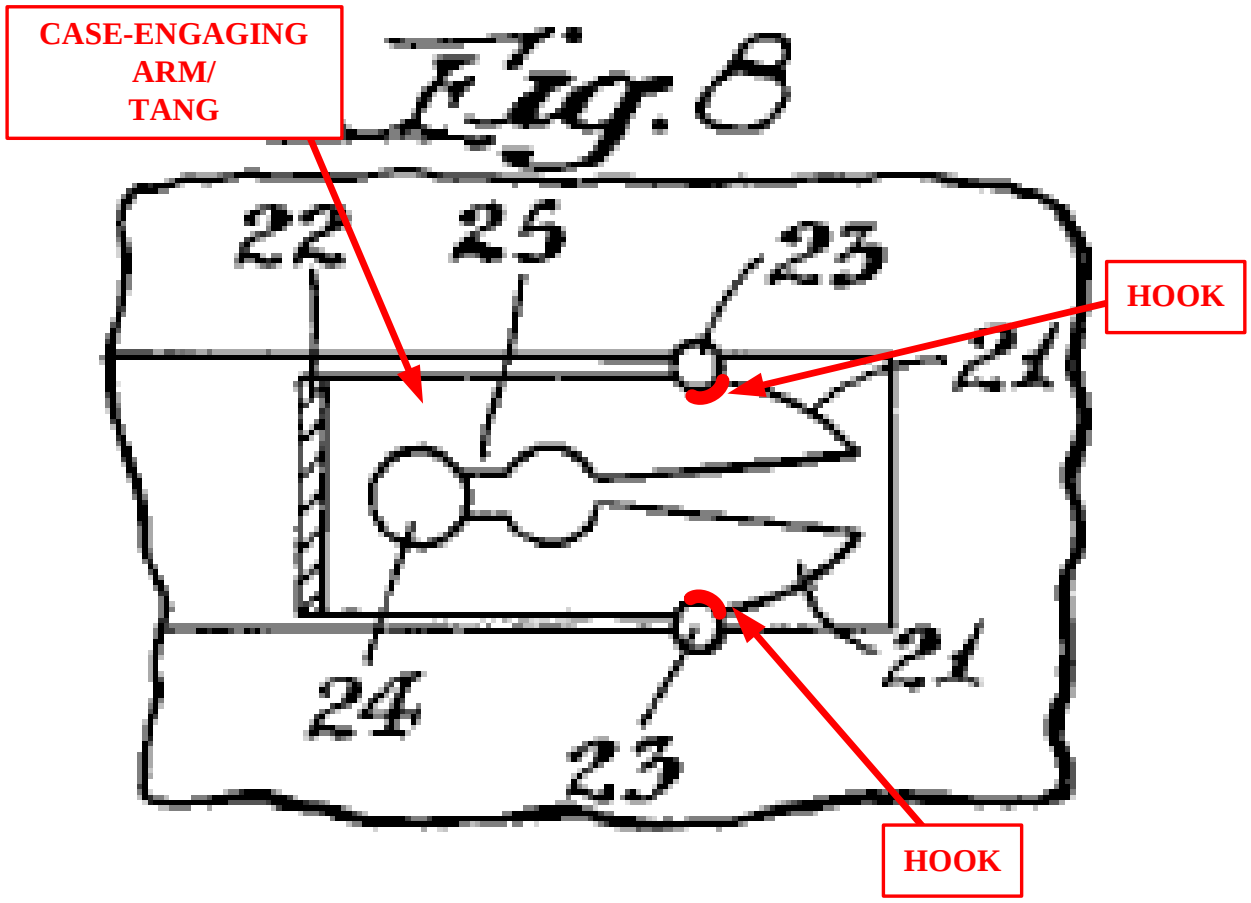
506. Accordingly, the Kane-Pelz combination discloses this limitation of Claim 1.

g. "the tang having a hook,"

507. In my opinion, the Kane-Pelz combination discloses this limitation.

508. Pelz discloses that the case-engaging arm **10** ("tang") has one or more side recesses that define one or more hooks. (Ex. 1008 at 1:48-52, 3:72-4:15, and FIG. 8.) For example, Pelz's FIG. 8 depicts an embodiment of the clip **2** ("auxiliary feature") with a case-engaging arm **10** ("tang") having one or more hooks (traced in red).

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(*Id*. at FIG. 8 (*annotated*).)

509. In my opinion, a POSITA, reading Pelz, would have understood one or more portions of the case-engaging arm **10** defined by the side recesses to constitute the claimed "hook." For example, the side recesses define one or more portions of the case-engaging arm **10** (*e.g.*, traced in red above) that abruptly change direction from the trunk section of the case engaging arm **10** ("tang") by extending substantially perpendicularly to the longitudinal extent thereof. Further, each side recess defines a ledge that catches a corresponding pin **23** in the depression **19** of the

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case **1**. (Ex. 1008 at 1:48-52, 3:72-4:15, and FIG. 8.) Additionally, the side recesses define one or more portions of the case-engaging arm **10** (*e.g.*, traced in red above) that constitute a curved or bent portion of the case-engaging arm **10** for catching or holding associated pins **23**.

510. A POSITA would have been motivated to configure a compact wallet, like that disclosed by Kane, with a clip ("auxiliary feature") having a case-engaging arm ("tang") with one or more hooks, like that disclosed by Pelz, to effectuate the removable attachment of the clip ("auxiliary feature"), because Kane and Pelz are in similar technical fields, address similar problems, utilize similar devices, and disclose methods that when combined function in the same manner as each does separately to yield predictable results. In doing so, the POSITA would apply a known technique to a known device ready for improvement to yield predictable results, as set forth in Section IX.B.1.e; which is incorporated here by reference. (Ex. 1006 at 2-3, 5, 7-8, 10-11, and photographs thereof; Ex. 1008 at 1:1-4, 1:6-12, 2:39-45, FIGS. 1-2 and 8.)

511. Such a POSITA would have been motivated to configure a compact wallet, like that disclosed by Kane, with a clip ("auxiliary feature") having a case-engaging arm ("tang") with one or more hooks, like that disclosed by Pelz, to enable a consumer to remove the clip when not needed, in accordance with the minimalist preferences inherent to the compact wallet marketplace and the teachings of Pelz.

(Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 7: photographs thereof, 9-10: "without money clip… with traditional money clip… with spring-loaded money clip," and photographs thereof, 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences;" Ex. 1008 at 1:12-14: "It generally is desirable to make the clips detachable so that the case can be used without them….")

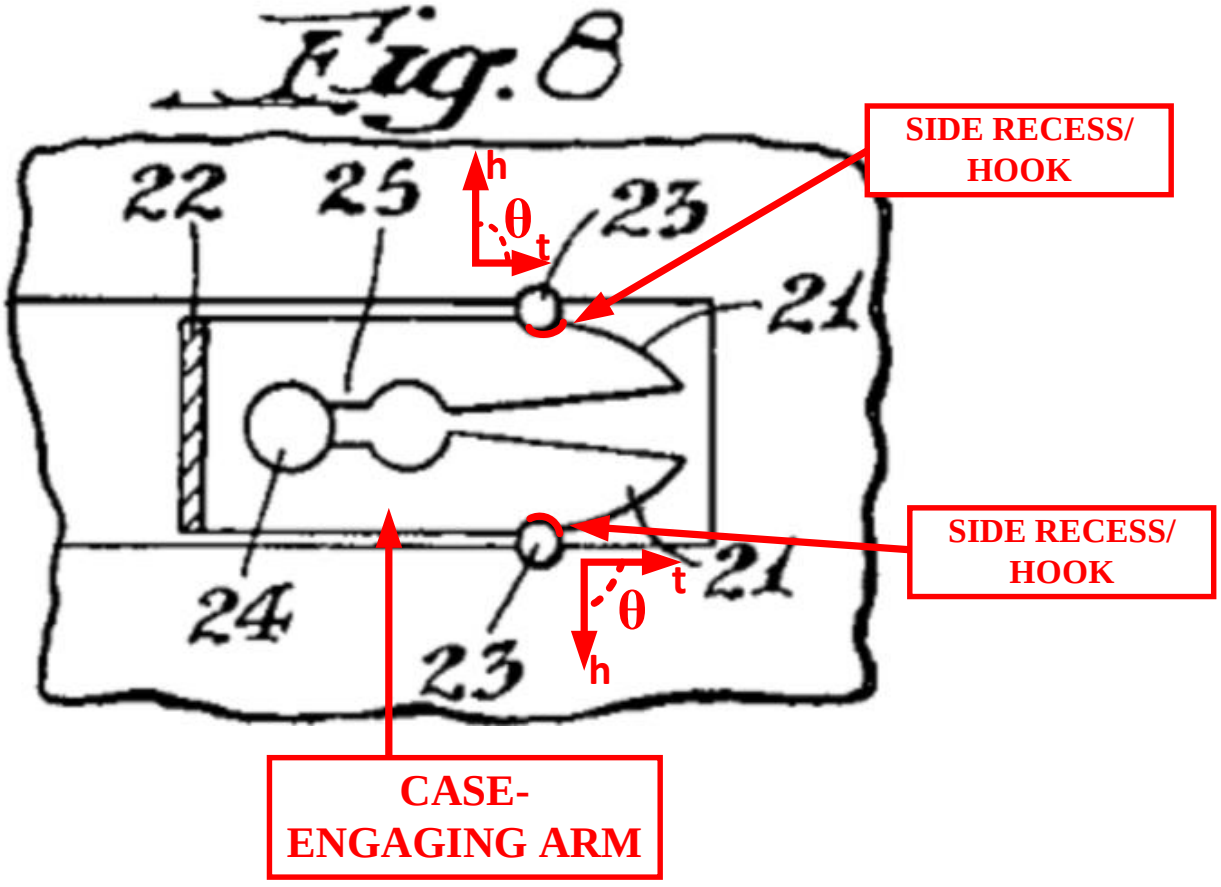
512. Moreover, a POSITA would have had good reason to incorporate the teachings of Pelz into Kane, as discussed above, with a reasonable expectation of success to advance the maintenance operations promoted by Kane. For example, Kane discloses turning a wallet "into a 'system' that can be completely disassembled by the user to replace the elastic and exchange outer plates for greater personalization." (Ex. 1006 at 5.) Rendering the clip ("auxiliary feature") removable via attachment by a case-engaging arm ("tang") with one or more hooks, as disclosed by Pelz, advances the disassembly and personalization of the wallets, as suggested by Kane. (Ex. 1006 at 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences.")

513. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 1.

h. "the hook extending at an angle to the tang,"

514. In my opinion, the Kane-Pelz combination discloses this limitation.

515. FIG. 8 of Pelz depicts the one or more hooks extending at an angle to the case-engaging arm **10** ("tang"). Provided below is a magnified portion of FIG. 8 of Pelz, annotated in red to delineate the direction at which the case-engaging arm ("tang") extends (t), the direction at which the hooks extend (h), and the angle therebetween (θ).



(Ex. 1008 at FIG. 8 (*annotated*).)

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516. Moreover, to the extent that the hooks are found not to extend at the nearly perpendicular angle shown above, a POSITA would have understood that a degree to the "angle" is not recited in limitation "h" of Claim 1.

517. A POSITA would have been motivated to configure a compact wallet, like that disclosed by Kane, with a clip having a case-engaging arm ("tang") with one or more hooks extending at an angle therefrom, like that disclosed by Pelz, to achieve a removable clip because Kane and Pelz are in similar technical fields, address similar problems, utilize similar devices, and disclose methods that when combined function in the same manner as each does separately to yield predictable results. In doing so, the POSITA would apply a known technique to a known device ready for improvement to yield predictable results, as set forth in Section IX.B.1.e; which is incorporated here by reference. (Ex. 1006 at 2-3, 5, 7-8, 10-11, and photographs thereof; Ex. 1008 at 1:1-4, 1:6-12, 2:39-45, FIGS. 1-2 and 8.)

518. Such a POSITA would have been motivated to configure a compact wallet, like that disclosed by Kane, with a clip having a case-engaging arm ("tang") with one or more hooks extending at an angle therefrom, like that disclosed by Pelz, to achieve a removable attachment of the clip that allows a consumer to remove the clip when not needed, in accordance with the minimalist preferences inherent to the compact wallet marketplace and the teachings of Pelz. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 7: photographs

thereof, 9-10: "without money clip… with traditional money clip… with spring-loaded money clip," and photographs thereof, 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences;" Ex. 1008 at 1:12-14: "It generally is desirable to make the clips detachable so that the case can be used without them….")

519. Moreover, a POSITA would have had good reason to incorporate the teachings of Pelz into Kane, as discussed above, with a reasonable expectation of success to advance the maintenance operations promoted by Kane. For example, Kane discloses turning a wallet "into a 'system' that can be completely disassembled by the user to replace the elastic and exchange outer plates for greater personalization." (Ex. 1006 at 5.) Utilizing one or more hooks extending at an angle to the case-engaging arm ("tang") of the clip ("auxiliary feature"), as disclosed by Pelz, facilitates removable attachment of the clip ("auxiliary feature") and advances the disassembly and personalization of the wallets, as suggested by Kane. (Ex. 1006 at 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences.")

520. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 1.

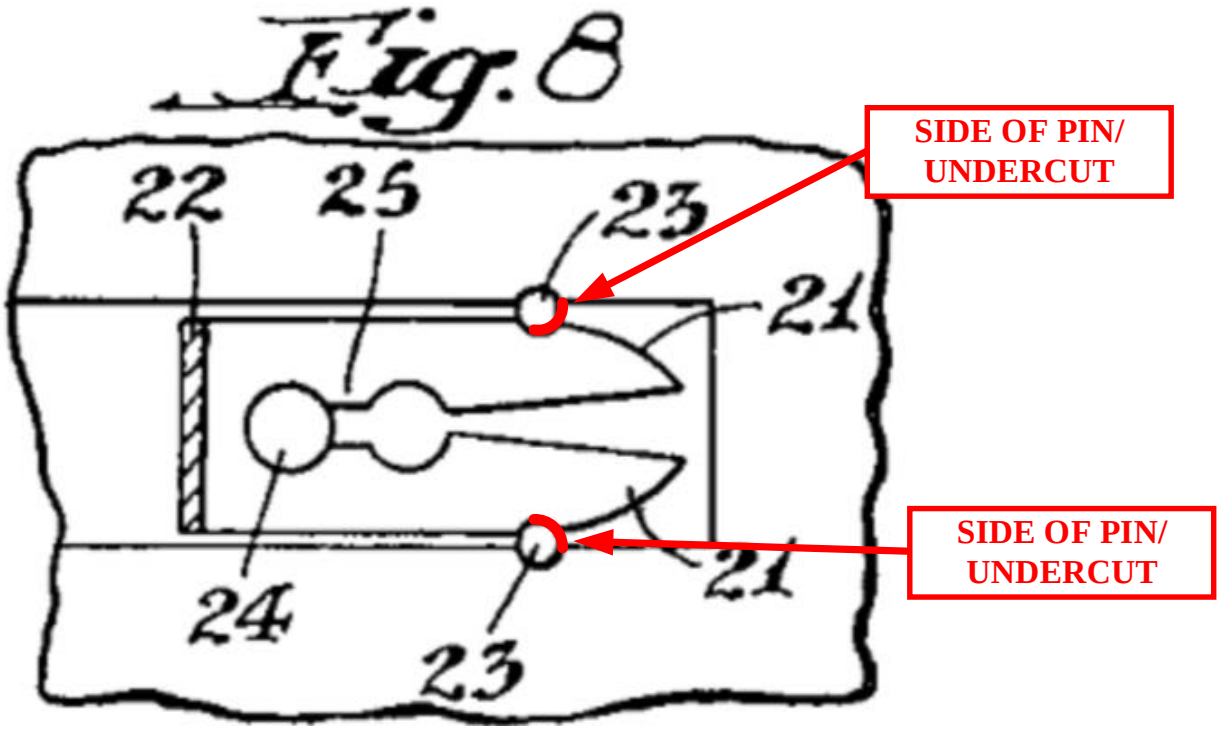
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i. "the hook engaging an undercut of the recess to prevent inadvertent dislodgement of the auxiliary feature from the recess,"

521. In my opinion, Pelz discloses this limitation.

522. Pelz discloses that the hooks of the case-engaging arm **10** ("tang") engage one or more pins **23** in the depression **19** ("recess") of the case **1**. (Ex. 1008 at 1:48-52, 3:72-4:15, and FIG. 8.) Further, the pins **23** can be integral with the case **1**. (*Id*. at 4:2-3.)

523. A POSITA reading Pelz would have understood at least a portion of the pins **23** (*e.g.*, the sidewall of the pins **23 –** traced in red below) to constitute the claimed "undercut." For example, Pelz discloses that the pins **23** may be "molded projections integral with the case **1**;" thereby constituting a cut away portion of the depression's **19** sidewall to increase the overall width of the depression **19** beyond the circumference of the pins **23**. (*Id.* at 3:73-4:2: "In the modification shown in FIG. 8, the laterally resilient fingers **21** of the case-engaging arm of the spring **22** are not engaged by a pin between them, but rather by means projecting from the case at the opposite sides of the arm.") A POSITA would understand that when the case **1** is in an upright orientation (*e.g.*, as depicted in FIG. 1 of Pelz), the pins **23** define an underside recess that is cut or molded into the case **1** to define a lip or protuberance.



(*Id*. at FIG. 8 (*annotated*).)

524. Further, a POSITA, reading Pelz, would understand that the hooks of the case-engaging arm **10** ("tang") engage the pins **23** ("undercut") to prevent the clip **2** ("auxiliary feature") from inadvertently dislodging from the depression **19** ("recess"). (*Id*. at 1:48-52: "The laterally resilient fingers are provided with side recesses for receiving means projecting from the case to normally hold the spring against movement downwardly thereon," 4:7-8: "The sides of these pins normally extend into recesses in the opposite sides of the spring arm.")

525. A POSITA would have been motivated to use a hook and undercut engagement, like that disclosed by Pelz, to prevent inadvertent dislodgement of a

clip ("auxiliary feature") on a compact wallet, like that disclosed by Kane, because Kane and Pelz are in similar technical fields, address similar problems, utilize similar devices, and disclose methods that when combined function in the same manner as each does separately to yield predictable results, as set forth in Section IX.B.1.e; which is incorporated here by reference. (Ex. 1006 at 2-3, 5, 7-8, 10-11, and photographs thereof; Ex. 1008 at 1:1-4, 1:6-12, 2:39-45, FIGS. 1-2 and 8.) In doing so, the POSITA would apply a known technique to a known device ready for improvement to yield predictable results.

526. Such a POSITA would have been motivated to use a hook and undercut engagement, like that disclosed by Pelz, to prevent inadvertent dislodgement of a clip ("auxiliary feature") on a compact wallet, like that disclosed by Kane, to enable a consumer to remove the clip ("auxiliary feature") when not needed, in accordance with the minimalist preferences inherent to the compact wallet marketplace and the teachings of Pelz. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 7: photographs thereof, 9-10: "without money clip… with traditional money clip… with spring-loaded money clip," and photographs thereof, 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences;" Ex. 1008 at 1:12-14: "It generally is desirable to make the clips detachable so that the case can be used without them….")

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527. Moreover, a POSITA would have had good reason to incorporate the teachings of Pelz into Kane, as discussed above, with a reasonable expectation of success to advance the maintenance operations promoted by Kane. For example, Kane discloses turning a wallet "into a 'system' that can be completely disassembled by the user to replace the elastic and exchange outer plates for greater personalization." (Ex. 1006 at 5.) Rendering the clip ("auxiliary feature") removable by a hook and undercut engagement, as disclosed by Pelz, advances the disassembly and personalization of the wallets, as suggested by Kane. (Ex. 1006 at 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences.")

528. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 1.

j. "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."

529. In my opinion, Kane discloses this limitation.

530. I explained earlier in Section IX.A.1.j that this limitation is disclosed by Kane. The discussion of Claim 1 presented in Section IX.A.1.j is incorporated herein by reference.

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531. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 1.

2. Claim 2

a. "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,"

532. In my opinion, Kane discloses this limitation.

533. As set forth above, the Kane-Pelz combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

534. I explained earlier in Section IX.A.2.a that this limitation is disclosed by Kane. The discussion of Claim 2 presented in Section IX.A.2.a is incorporated herein by reference.

535. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 2.

b. "the groove slidingly receiving one part of the at least one encircling elastic band."

536. In my opinion, Kane discloses this limitation.

537. As set forth above, the Kane-Pelz combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

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538. I explained earlier in Section IX.A.2.b that this limitation is disclosed by Kane. The discussion of Claim 2 presented in Section IX.A.2.b is incorporated herein by reference.

539. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 2.

3. Claim 3

a. "The compact wallet of claim 2, wherein a second lamina of the laminate constructions 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."

540. In my opinion, Kane discloses this limitation.

541. As set forth above, the Kane-Pelz combination discloses each and every limitation of Claim 2, and said discussion is incorporated herein by reference.

542. I explained earlier in Section IX.A.3.a that this limitation is disclosed by Kane. The discussion of Claim 3 presented in Section IX.A.3.a is incorporated herein by reference.

543. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 3.

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4. Claim 4

a. "The compact wallet of claim 3, wherein the second lamina is attached to the first lamina by screws."

544. In my opinion, Kane discloses this limitation.

545. As set forth above, the Kane-Pelz combination discloses each and every limitation of Claim 3, and said discussion is incorporated herein by reference.

546. I explained earlier in Section IX.A.4.a that this limitation is disclosed by Kane. The discussion of Claim 4 presented in Section IX.A.4.a is incorporated herein by reference.

547. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 4.

5. Claim 5

a. "The compact wallet of claim 3, wherein the second lamina is attached to the first lamina by pressure sensitive adhesive means."

548. In my opinion, a POSITA, reading Kane, would have found it obvious to use pressure sensitive adhesive to attach the outer faceplate (the "second lamina") to the interior plate (the "first lamina").

549. As set forth above, the Kane-Pelz combination discloses each and every limitation of Claim 3, and said discussion is incorporated herein by reference.

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550. I explained earlier in Section IX.A.5.a that this limitation is disclosed by Kane. The discussion of Claim 1 presented in Section IX.A.5.a is incorporated herein by reference.

551. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 5.

6. Claim 6

a. "The compact wallet of claim 1, wherein each rigid plate is comprised of metal for RFID protection."

552. In my opinion, Kane discloses this limitation.

553. As set forth above, the Kane-Pelz combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

554. I explained earlier in Section IX.A.6.a that this limitation is disclosed by Kane. The discussion of Claim 6 presented in Section IX.A.6.a is incorporated herein by reference.

555. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 6.

7. Claim 7

a. "The compact wallet of claim 1, wherein each rigid plate is metalized for RFID protection."

556. In my opinion, Kane discloses this limitation.

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557. As set forth above, the Kane-Pelz combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

558. I explained earlier in Section IX.A.7.a that this limitation is disclosed by Kane. The discussion of Claim 7 presented in Section IX.A.7.a is incorporated herein by reference.

559. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 7.

8. Claim 8

a. "The compact wallet of claim 3, wherein at least one of the first or second lamina of each rigid plate is comprised of metal."

560. In my opinion, Kane discloses this limitation.

561. As set forth above, the Kane-Pelz combination discloses each and every limitation of Claim 3, and said discussion is incorporated herein by reference.

562. I explained earlier in Section IX.A.8.a that this limitation is disclosed by Kane. The discussion of Claim 8 presented in Section IX.A.8.a is incorporated herein by reference.

563. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 8.

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9. Claim 9

a. "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,"

564. In my opinion, Kane discloses this limitation.

565. As set forth above, the Kane-Pelz combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

566. I explained earlier in Section IX.A.9.a that this limitation is disclosed by Kane. The discussion of Claim 9 presented in Section IX.A.9.a is incorporated herein by reference.

567. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 9.

b. "the positioning functioning to retain the card-like contents from that end."

568. In my opinion, Kane discloses this limitation.

569. As set forth above, the Kane-Pelz combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

570. I explained earlier in Section IX.A.9.b that this limitation is disclosed by Kane. The discussion of Claim 9 presented in Section IX.A.9.b is incorporated herein by reference.

571. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 9.

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10. Claim 11

a. "The compact wallet of claim 1, wherein the card-like contents comprise one or more of a credit card, a driver's license, an ID card, a business card, an affiliation card, a currency bill, a loyalty card, a coupon, a receipt or a personal paper."

572. In my opinion, Kane discloses this limitation.

573. As set forth above, the Kane-Pelz combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

574. I explained earlier in Section IX.A.10.a that this limitation is disclosed by Kane. The discussion of Claim 11 presented in Section IX.A.10.a is incorporated herein by reference.

575. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 11.

11. Claim 12

a. "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,"

576. In my opinion, Kane discloses this limitation.

577. As set forth above, the Kane-Pelz combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

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578. I explained earlier in Section IX.A.11.a that this limitation is disclosed by Kane. The discussion of Claim 12 presented in Section IX.A.11.a is incorporated herein by reference.

579. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 12.

b. "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."

580. In my opinion, Kane discloses this limitation.

581. As set forth above, the Kane-Pelz combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

582. I explained earlier in Section IX.A.11.b that this limitation is disclosed by Kane. The discussion of Claim 12 presented in Section IX.A.11.b is incorporated herein by reference.

583. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 12.

12. Claim 13

a. "The compact wallet of claim 1, wherein the encircling elastic band is comprised of woven elastic fabric."

584. In my opinion, Kane discloses this limitation.

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585. As set forth above, the Kane-Pelz combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

586. I explained earlier in Section IX.A.12.a that this limitation is disclosed by Kane. The discussion of Claim 13 presented in Section IX.A.12.a is incorporated herein by reference.

587. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 13.

13. Claim 14

a. "A compact wallet, comprising:"

588. As discussed above in Section IX.A.1.a, with respect to limitation "a" of Claim 1 and Section IX.A.13.a with respect to limitation "a" of Claim 14, Kane discloses a compact wallet. (Ex. 1006 at 2-3.) The discussion of Claim 1 presented in Section IX.A.1.a, and the discussion of Claim 14 presented in Section IX.A.13.a, are incorporated herein by reference.

589. Accordingly, in my opinion, the Kane-Pelz combination discloses the preamble of Claim 14.

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

590. In my opinion, Kane discloses this limitation.

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591. I explained earlier in Section IX.A.13.b that this limitation is disclosed by Kane. For example, a POSITA, reading Kane, would have understood the two interior plate-outer faceplate pairs to constitute the claimed "at least two rigid plates," and the integrated elastic track to constitute the "groove." The discussion of Claim 14 presented in Section IX.A.13.b is incorporated herein by reference.

592. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 14.

c. "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,"

593. In my opinion, Kane discloses this limitation.

594. I explained earlier in Section IX.A.13.c that this limitation is disclosed by Kane. The discussion of Claim 14 presented in Section IX.A.13.c is incorporated herein by reference.

595. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 14.

d. "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"

596. In my opinion, Kane discloses this limitation.

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597. I explained earlier in Section IX.A.13.d that this limitation is disclosed by Kane. The discussion of Claim 14 presented in Section IX.A.13.d is incorporated herein by reference.

598. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 14.

e. "a recess formed inside at least one of the at least two rigid plates,"

599. In my opinion, the Kane-Pelz combination discloses this limitation.

600. As discussed above in Section IX.B.1.f, regarding limitation "f" of Claim 1, Pelz discloses a depression **19** formed inside the sidewall of the case **1**. (Ex. 1008 at 3:61-66, and FIGS. 5-8.) A POSITA, reading Pelz, would have understood the depression **19** to constitute the claimed "recess." The discussion of Claim 1 presented in Section IX.B.1.f is incorporated herein by reference.

601. Further, to the extent it were found that Pelz does not disclose a recess formed inside a rigid plate, a POSITA would have been motivated to form a depression ("recess"), like that disclosed by Pelz, inside one or more of the interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, to effectuate the removable attachment of a clip ("auxiliary feature"), like that disclosed by Pelz and discussed above, because Kane and Pelz are in similar technical fields, address similar problems, utilize similar devices, and disclose methods that when combined

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function in the same manner as each does separately to yield predictable results, as set forth in Section IX.B.1.e; which is incorporated here by reference. (Ex. 1006 at 2-3, 5, 7-8, 10-11, and photographs thereof; Ex. 1008 at 1:1-4, 1:6-12, 2:39-45, FIGS. 1-2 and 8.) In doing so, the POSITA would apply a known technique to a known device ready for improvement to yield predictable results.

602. Additionally, such a POSITA would have been motivated to form a depression ("recess"), like that disclosed by Pelz, inside an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, to provide a removably attachable clip ("auxiliary feature") while minimizing the profile of the wallet, which is described as a "core design" feature by Kane. (Ex. 1006 at 3: "Core Design: Low profile to easily fit in your front pocket."). For example, said motivation is buttressed by Pelz's teachings. (*Id*. at 3:61-66: "It is preferred to provide the case with a rectangular depression **19** for the spring that serves the double purpose of a guide for the spring in attaching it to the case and a recess for the arm **10** so that the spring and stud and pin will not project from the case any farther than necessary.")

603. For example, a POSITA would be motivated to form a depression ("recess"), like that disclosed by Pelz, in an interior plate of an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, to effectuate the removable attachment of a clip ("auxiliary feature") to compact wallet. (Ex. 1006 at 9-10: "without money clip," "with traditional money clip," "with spring-loaded money

clip;" Ex. 1008 at 1:12-14: "It generally is desirable to make the clips detachable so that the case can be used without them….")

604. Moreover, forming a depression ("recess), like that disclosed by Pelz, in an interior plate, like that disclosed by Kane, would be a mere continuation of one or more milling operations conducted to form the integrated elastic track ("channeling means"). As such, forming a depression ("recess"), like that disclosed by Pelz, in an interior plate of a compact wallet, like that disclosed by Kane, would not require any additional machinery to manufacture, and minimal additional costs, if any. Such milling operations are routine and very familiar to a POSITA at the time of the Critical Date.

605. Further, such a POSITA would have been motivated to form a depression ("recess"), like that disclosed by Pelz, inside one or more of the interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, to effectuate removable attachment of a clip in order to provide a compact wallet that allows a consumer to remove the clip when not needed, in accordance with the minimalist preferences inherent to the compact wallet marketplace and the teachings of Pelz. (Ex. 1006 at 9-10: "without money clip… with traditional money clip… with spring-loaded money clip," 11-15: photographs thereof; Ex. 1008 at 1:12-14: "It generally is desirable to make the clips detachable so that the case can be used without them….")

606. Additionally, a POSITA would have had good reason to incorporate the teachings of Pelz into Kane, as discussed above, with a reasonable expectation of success to advance the maintenance operations promoted by Kane. For example, Kane discloses turning a wallet "into a 'system' that can be completely disassembled by the user to replace the elastic and exchange outer plates for greater personalization." (Ex. 1006 at 3.) Forming a depression ("recess"), like that disclosed by Pelz, into one or more interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, to employ a removable clip would advance the disassembly and personalization of the wallets, as suggested by Kane. (Ex. 1006 at 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences.")

607. Accordingly, the Kane-Pelz combination discloses this limitation of Claim 14.

f. "the recess operable to receive a tang of an auxiliary feature,"

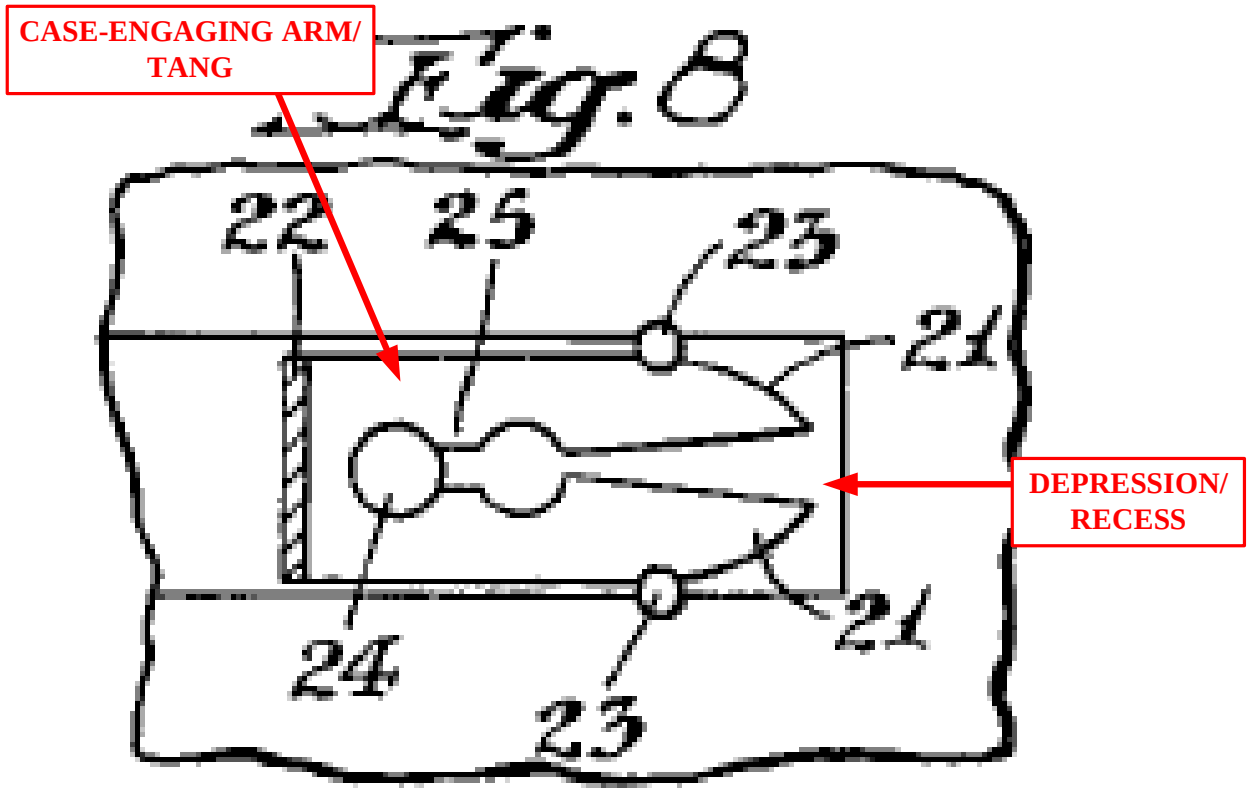
608. In my opinion, the Kane-Pelz combination discloses this limitation.

609. As discussed above in Section IX.B.1.f, with respect to limitation "f" of Claim 1, Pelz discloses that the depression **19** ("recess") is operable to receive a case-engaging arm **10** ("tang") of a clip **2** ("auxiliary feature"). (Ex. 1008 at 2:54-3:3, and FIG. 8.) A POSITA, reading Pelz, would have understood the case-engaging

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arm **10** to constitute the claimed "tang." The discussion of Claim 1 presented in Section IX.B.1.f is incorporated herein by reference.

610. For example, FIG. 8 of Pelz depicts the depression **19** ("recess") operable to receive a case-engaging arm **10** ("tang") of the clip **2** ("auxiliary feature").



(*Id.* at FIG. 8 (*annotated*).)

611. As discussed above in Section IX.B.1.e, Pelz discloses a clip **2** positioned exterior to the case **1**. (Ex. 1008 at 1:2-3, 1:28-2:7, 2:25-27, 3:72-4:15, FIGS. 1-2 and 8.) A POSITA, reading Pelz, would have understood the clip **2** to constitute the claimed "auxiliary feature." (*Id.* at 2:25-28.)

612. Moreover, a POSITA would have been motivated to configure a compact wallet, like that disclosed by Kane, with a depression ("recess") operable to receive a case-engaging arm ("tang") of a clip ("auxiliary feature"), like that disclosed by Pelz, to render a compact wallet with a removable, low profile clip in accordance with the personalization, adapted use, and/or maintenance/repair operations promoted by Kane. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange the outer plates for greater personalization," 9-10: "without money clip," "with traditional money clip," "with spring-loaded money clip.")

613. For example, the teachings of Pelz are pertinent to multiple problems addressed by the inventor of the '808 Patent, including: an "unfulfilled need" for a compact wallet "void of any potentially snagging structural appendages;" and an objective "to provide a method for making a compact wallet with different features attached thereto which can be modularly exchanged." (Ex. 1001 at 2:1-4, 2:37-40; Ex. 1008 at 1:20-27: "It is among the objects of this invention to provide… a clip that lies close to the case, which has little tendency to catch on the clothing… and which is readily detachable from the case." In doing so, such a POSITA would have been applying this known method of enhancement to the compact wallet of Kane to yield predictable results.

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614. The discussion of Claim 1 presented in Section IX.B.1.e is incorporated herein by reference.

615. Accordingly, the Kane-Pelz combination discloses this limitation of Claim 14.

g. "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,"

616. In my opinion, the Kane-Pelz combination discloses this limitation.

617. As discussed above in Section IX.B.1.g and Section IX.B.1.i, with respect to limitations "g" and "i" of Claim 1, Pelz discloses that the depression **19** ("recess") has one or more undercuts (*e.g.*, defined by the sidewall of one or more pins **23**) that engage one or more hooks (*e.g.*, defined by one or more side recess of the case-engaging arm **10**) of the case-engaging arm **10** ("tang") to prevent inadvertent dislodgement of the clip **2** ("auxiliary feature") from the depression **19** ("recess"). (*Id*. at 1:48-52, 3:61-66, 3:72-4:15, and FIG. 8.) The discussions of Claim 1 presented in Sections IX.B.1.g and IX.B.1.i are incorporated herein by reference.

618. Further, as discussed above in Section IX.B.1.e, with respect limitation "e" of Claim 1, Pelz discloses that the clip **2** ("auxiliary feature") is removably positioned on the case **1**. (*Id*. at 1:41-43: "under manual pressure, the clip is movable

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vertically out of position so that it can be disengaged from the case.") The discussion of Claim 1 presented in Section IX.B.1.e is incorporated herein by reference.

619. In my opinion, a POSITA would have looked to Pelz for guidance on how to removably attach a clip ("auxiliary feature") to a compact wallet, like that disclosed by Kane, via a hook and undercut engagement in a depression ("recess"), like that disclosed by Pelz, because Pelz and Kane are in similar technical fields, address similar problems, utilize similar devices, and disclose structural features that, when combined, function in the same manner as each does separately to yield predictable results, as set forth in Section IX.B.1.e; which is incorporated here by reference. (Ex. 1006 at 2-3, 5, 7-8, 10-11, and photographs thereof; Ex. 1008 at 1:1-4, 1:6-12, 2:39-45, FIGS. 1-2 and 8.)

620. Further, the teachings of Pelz are pertinent to multiple problems addressed by the inventor of the '808 Patent, including: an "unfulfilled need" for a compact wallet "void of any potentially snagging structural appendages;" and an objective "to provide a method for making a compact wallet with different features attached thereto which can be modularly exchanged." (Ex. 1001 at 2:1-4, 2:37-40; Ex. 1008 at 1:20-27: "It is among the objects of this invention to provide… a clip that lies close to the case, which has little tendency to catch on the clothing… and which is readily detachable from the case."

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621. In doing so, a POSITA would be using a known technique to improve similar devices in the same way. The technique of configuring a compact device (to be carried on one's person) with an attached clip ("auxiliary feature") that is removable via a hook and undercut engagement was within the realm of ordinary capabilities of a POSITA based upon the teachings of at least Pelz. (Ex. 1008 at 1:20-27: "a clip that lies close the case… and which is readily detachable from the case;" 2:25-28, "3:72-4:15, FIGS. 1-2 and 8.) Further, a POSITA would have been capable of applying this known method of configuring the compact wallet of Kane to yield predictable results.

622. Having reviewed Pelz, such a POSITA would have been motivated to removably attach a clip ("auxiliary feature") to an interior plate-outer faceplate pair ("rigid plate") of a wallet, like that disclosed by Kane, via a hook and undercut engagement in a depression ("recess"), like that disclosed by Pelz, to provide a compact wallet that allows a consumer to remove the clip ("auxiliary feature") when not needed, in accordance with the minimalist preferences inherent to the compact wallet marketplace and the teachings of Pelz. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 7: photographs thereof, 9-10: "without money clip… with traditional money clip… with spring-loaded money clip," and photographs thereof, 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide

range of people and preferences;" Ex. 1008 at 1:12-14: "It generally is desirable to make the clips detachable so that the case can be used without them….")

623. Moreover, a POSITA would have had good reason to incorporate the teachings of Pelz into Kane, as discussed above, with a reasonable expectation of success to advance the maintenance operations promoted by Kane. For example, Kane discloses turning a wallet "into a 'system' that can be completely disassembled by the user to replace the elastic and exchange outer plates for greater personalization." (Ex. 1006 at 3.) Rendering the clip ("auxiliary feature") removable via a hook and undercut engagement in a depression ("recess"), as disclosed by Pelz, advances the disassembly and personalization o the wallets, as suggested by Kane. (Ex. 1006 at 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences.")

624. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 14.

h. "the hook extending at an angle to the tang,"

625. In my opinion, the Kane-Pelz combination discloses this limitation.

626. As discussed above in Section IX.B.1.h, with respect to limitation "h" of Claim 1, Pelz discloses one or more hooks extending at an angle to the case-engaging arm **10** ("tang") of the clip **2** ("auxiliary feature"). (Ex. 1008 at FIG. 8.)

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The discussion of Claim 1 presented in Section IX.B.1.h is incorporated herein by reference.

627. Further, a POSITA would have been motivated to configure a compact wallet, like that disclosed by Kane, with a clip having a case-engaging arm ("tang") with one or more hooks extending at an angle therefrom, like that disclosed by Pelz, to achieve a removable clip because Kane and Pelz are in the similar technical field, address similar problems, utilize similar devices, and disclose methods that when combined function in the same manner as each does separately to yield predictable results, as set forth in Section IX.B.1.e; which is incorporated here by reference. (Ex. 1006 at 2-3, 5, 7-8, 10-11, and photographs thereof; Ex. 1008 at 1:1-4, 1:6-12, 2:39-45, FIGS. 1-2 and 8.)

628. Further, the teachings of Pelz are pertinent to multiple problems addressed by the inventor of the '808 Patent, including: an "unfulfilled need" for a compact wallet "void of any potentially snagging structural appendages;" and an objective "to provide a method for making a compact wallet with different features attached thereto which can be modularly exchanged." (Ex. 1001 at 2:1-4, 2:37-40; Ex. 1008 at 1:20-27: "It is among the objects of this invention to provide… a clip that lies close to the case, which has little tendency to catch on the clothing… and which is readily detachable from the case." In doing so, such a POSITA would have

been applying this known method of enhancement to the compact wallet of Kane to yield predictable results.

629. Such a POSITA would have been motivated to configure a compact wallet, like that disclosed by Kane, with a clip having a case-engaging arm ("tang") with one or more hooks extending at an angle therefrom, like that disclosed by Pelz, to enable a consumer to remove the clip when not needed, in accordance with the minimalist preferences inherent to the compact wallet marketplace and the teachings of Pelz. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 7: photographs thereof, 9-10: "without money clip… with traditional money clip… with spring-loaded money clip," and photographs thereof, 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences;" Ex. 1008 at 1:12-14: "It generally is desirable to make the clips detachable so that the case can be used without them….")

630. Moreover, a POSITA would have had good reason to incorporate the teachings of Pelz into Kane, as discussed above, with a reasonable expectation of success to advance the maintenance operations promoted by Kane. For example, Kane discloses turning a wallet "into a 'system' that can be completely disassembled by the user to replace the elastic and exchange outer plates for greater personalization." (Ex. 1006 at 5.) Utilizing one or more hooks extending at an angle

to the case-engaging arm ("tang") of the clip, as disclosed by Pelz, facilitates removable attachment of the clip and advances the disassembly and personalization of the wallets, as suggested by Kane. (Ex. 1006 at 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences.")

631. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 14.

i. "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."

632. In my opinion, Kane discloses this limitation.

633. I explained earlier in Section IX.A.1.j (with respect to limitation "j" of Claim 1) and Section IX.A.13.i that this limitation is disclosed by Kane. The discussion of Claim 14 presented in Section IX.A.13.i is incorporated herein by reference.

634. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 14.

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14. Claim 15

a. "The compact wallet of claim 14, wherein the groove is in a first lamina of a laminate construction of each rigid plate,"

635. In my opinion, Kane discloses this limitation.

636. As set forth above, the Kane-Pelz combination discloses each and every limitation of Claim 14, and said discussion is incorporated herein by reference.

637. I explained earlier in Section IX.A.14.a that this limitation is disclosed by Kane. The discussion of Claim 15 presented in Section IX.A.14.a is incorporated herein by reference.

638. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 15.

b. "the groove slidingly receiving one part of the at least one encircling elastic band."

639. In my opinion, Kane discloses this limitation.

640. As set forth above, the Kane-Pelz combination discloses each and every limitation of claim 14, and said discussion is incorporated herein by reference.

641. I explained earlier in Section IX.A.14.b that this limitation is disclosed by Kane. The discussion of Claim 15 presented in Section IX.A.14.b is incorporated herein by reference.

642. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 15.

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15. Claim 16

a. "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."

643. In my opinion, Kane discloses this limitation.

644. As set forth above, the Kane-Pelz combination discloses each and every limitation of Claim 15, and said discussion is incorporated herein by reference.

645. I explained earlier in Section IX.A.15.a that this limitation is disclosed by Kane. The discussion of Claim 16 presented in Section IX.A.15.a is incorporated herein by reference.

646. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 16.

16. Claim 17

a. "The compact wallet of claim 16, wherein the second lamina is attached to the first lamina by screws."

647. In my opinion, Kane discloses this limitation.

648. As set forth above, the Kane-Pelz combination discloses each and every limitation of Claim 16, and said discussion is incorporated herein by reference.

649. I explained earlier in Section IX.A.16.a that this limitation is disclosed by Kane. The discussion of Claim 17 presented in Section IX.A.16.a is incorporated herein by reference.

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650. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 17.

17. Claim 18

a. "The compact wallet of claim 1, wherein each rigid plate is comprised of metal for RFID protection."

651. In my opinion, Kane discloses this limitation.

652. As set forth above, the Kane-Pelz combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

653. I explained earlier in Section IX.A.17.a that this limitation is disclosed by Kane. The discussion of Claim 18 presented in Section IX.A.17.a is incorporated herein by reference.

654. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 18.

18. Claim 19

a. "A method of making a modular compact wallet, comprising the steps:"

655. Claim 19 recites a method for making, in my opinion, the compact wallet recited in Claim 1 and/or Claim 14.

656. Accordingly, the discussion of Claim 1 presented in Section IX.B.1 and the discussion of Claim 14 presented in Section IX.B.13 are incorporated herein by reference.

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657. As discussed above in Section IX.A.18.a, Kane discloses methods of making a modular compact wallet. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange outer plates for greater personalization… low profile to easily fit in your front pocket.") The discussion of Claim 19 presented in Section IX.A.18.a, which is incorporated herein by reference.

658. Accordingly, in my opinion, the Kane-Pelz combination discloses the preamble of Claim 19.

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

659. In my opinion, Kane discloses this limitation.

660. I explained earlier in Section IX.A.13.b (with respect to limitation "b" of Claim 14) and Section IX.A.18.b (with respect limitation "b" of Claim 18) that this limitation is disclosed by Kane. For example, a POSITA, reading Kane, would have understood the two interior plate-outer faceplate pairs to constitute the claimed "at least two rigid plates," and the integrated elastic track to constitute the claimed "groove." The discussions of Claim 14 presented in Section IX.A.13.b and Claim 19 presented in Section IX.A.18.b are incorporated herein by reference.

661. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 19.

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c. "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,"

662. In my opinion, Kane discloses this limitation.

663. I explained earlier in Section IX.A.18.c that this limitation is disclosed by Kane. The discussion of Claim 19 presented in Section IX.A.18.c is incorporated herein by reference.

664. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 19.

d. "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,"

665. In my opinion, Kane discloses this limitation.

666. I explained earlier in Section IX.A.13.d (with respect to limitation "d" of Claim 14) and Section IX.A.18.d (with respect to limitation "d" of Claim 19) that this limitation is disclosed by Kane. The discussions of Claim 14 presented in Section IX.A.13.d and Claim 19 presented in Section IX.A.18.d are incorporated herein by reference.

667. Accordingly, in my opinion, The Kane-Pelz combination discloses this limitation of Claim 19.

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e. "at least one groove additionally having at least one recess positioned outbound of the elastic band;"

668. In my opinion, the Kane-Pelz combination discloses this limitation.

669. Claim 19 does not provide antecedent basis for recitation of "at least one groove;" however, in my opinion, a POSITA would have understood the "at least one groove" to be at least one groove of the grooves of the rigid plates.

670. As discussed above in Section IX.B.1.f (with respect limitation "f" of Claim 1) and Section IX.B.13.e (with respect to limitation "e" of Claim 14), Pelz discloses a depression **19** ("recess") in the case **1**. (Ex. 1008 at 3:61-66.) A POSITA, reading Pelz, would have understood the depression **19** to constitute the claimed "recess." Further discussed in Section IX.B.13.e, a POSITA would have been motivated to form a depression ("recess"), like that disclosed by Pelz, in one or more interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, to effectuate a removably attachable clip to facilitate user personalization, adapted uses, and/or maintenance/repair operations. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange the outer plates for greater personalization," 6: "The Ridge 2 is available with two different types of money clips or without a clip," 7: photographs thereof, 9-10: "without money clip… with traditional money clip… with spring-loaded money clip," and photographs thereof, 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people

and preferences;" Ex. 1008 at 1:12-14: "It generally is desirable to make the clips detachable so that the case can be used without them….") The discussion of Claim 14 presented in Section IX.B.13.e is incorporated herein by reference.

671. Moreover, a POSITA would have been motivated to form the depression ("recess"), like that disclosed by Pelz, in one or more the interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, outbound the encircling elastic band ("elastic band," understood to reference the "at least one encircling elastic band") to avoid interference between the function of the depression ("recess") (*e.g.*, to capture an auxiliary feature) and the function of the elastic band (*e.g.*, to expand and contract while enabling the wallet to have elastic volume).

672. A POSITA would have looked to Pelz for guidance as to the outbound positioning of the depression ("recess"), like that disclosed by Pelz, in one or more of the interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, because Kane and Pelz are in similar technical fields, address similar problems, utilize similar devices, and disclose methods that when combined function in the same manner as each does separately to yield predictable results, as set forth in Section IX.B.1.e; which is incorporated here by reference. (Ex. 1006 at 2-3, 5, 7-8, 10-11, and photographs thereof; Ex. 1008 at 1:1-4, 1:6-12, 2:39-45, FIGS. 1-2 and 8.)

673. In addition, A POSITA would have been motivated to form the depression ("recess"), like that disclosed by Pelz, in one or more the interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, outbound the elastic band at least because said positioning is one of a finite number of identified, predictable positions, with a reasonable expectation of success. For example, there are a finite number of locations in the interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, where a depression ("recess"), like that disclosed by Pelz, could be positioned. Further, a POSITA would have reasonably predicted that positioning a depression ("recess"), like that disclosed by Pelz, outbound the encircling elastic band, like that disclosed by Kane, would result in successful operation of both the depression ("recess") and the elastic band.

674. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 19.

f. "providing a first auxiliary feature having at least one tang;"

675. In my opinion, both Kane and Pelz each disclose this limitation.

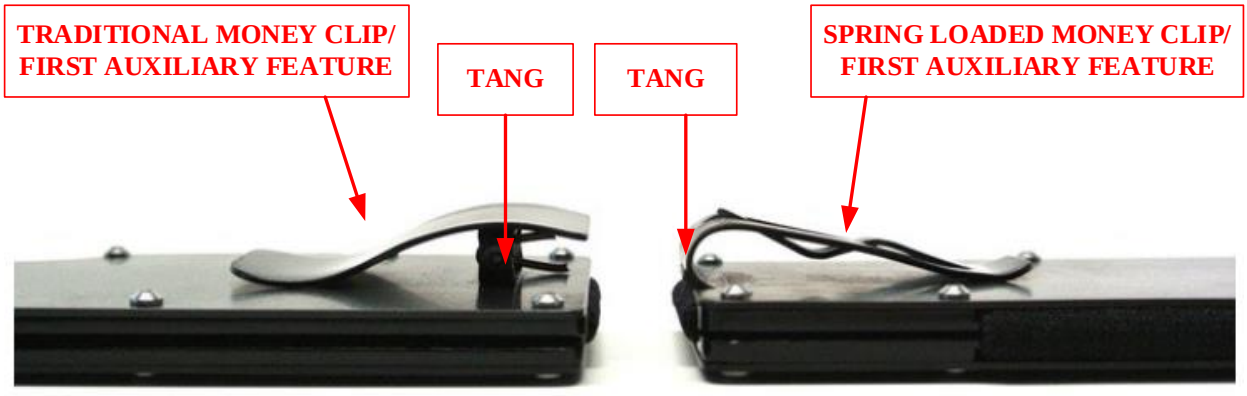
676. As discussed above in Section IX.B.13.f, with respect to limitation "f" of Claim 14, Pelz discloses a clip **2** having at least one case-engaging arm **10** ("tang"). (Ex. 1008 at 2:54-3:1: "To detachably connect the spring to the case the case-engaging arm **10** of the spring is provided near its lower end," and FIG. 8.) The

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discussion of Claim 14 presented in Section IX.B.13.f is incorporated herein by reference.

677. A POSITA, reading Pelz, would have understood the clip **2** to constitute the claimed "first auxiliary feature." Also, a POSITA, reading Pelz, would have understood the case-engaging arm **10** to constitute the claimed "tang." Further, having reviewed Pelz, a POSITA, in my opinion, would have understood that Pelz discloses "providing" the clip **2** (the "auxiliary feature") to assemble the wallet **5**. (*Id.*)

678. Also, Kane discloses a money clip ("first auxiliary feature") having at least one tang. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip.") A POSITA, reading Kane, would have understood the money clip to constitute the claimed "first auxiliary feature." For example, Kane discloses the following photograph depicting the money clip ("first auxiliary feature") and the tang thereof.



(*Id*. (*annotated*))

679. Having reviewed Kane, a POSITA, in my opinion, would have understood that Kane discloses "providing" the money clip ("first auxiliary feature") to assemble the wallet.

680. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 19.

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

681. In my opinion, the Kane-Pelz combination discloses this limitation.

682. Pelz discloses removably inserting the case-engaging arm **10** ("tang") of a clip **2** ("auxiliary feature") into a depression **19** ("recess") to make the clip **2** ("auxiliary feature") available to an outside face of the case **1**. (Ex. 1008 at 3:61-64: "a rectangular depression **19** for the spring that serves the… the purpose of… a recess for the arm **10**," 1:42-43: "the clip is movable vertically out of position so that it can be disengaged from the case," and FIG. 8.)

683. To the extent that Pelz is found not to disclose making the clip **2** ("auxiliary feature") available at an outside face of at least one rigid plate; a POSITA would have been motivated to insert, removably, the case-engaging arm ("tang") of an initial clip ("first auxiliary feature") into a depression ("recess"), like that

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disclosed by Pelz, formed inside an interior plate-outer faceplate pair ("rigid plate") of a wallet, like that disclosed by Kane, to effectuate a removable clip that advances the personalization, adapted use, and/or maintenance operations described herein. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange the outer plates for greater personalization," 9-10: "without money clip," "with traditional money clip," "with spring-loaded money clip;" Ex. 1008 at 1:12-14: "It generally is desirable to make the clips detachable so that the case can be used without them….")

684. In doing so, such a POSITA would make the initial clip ("first auxiliary feature") available to the outside face of the interior plate-outer faceplate pair ("rigid plate") in accordance with the common operation of a clip (*e.g.*, as evidenced by Kane and Pelz both disclosing clips made available to the outside of the respective containers). (Ex. 1006 at 6-7; Ex. 1008, FIGS. 1 and 8.)

685. In attaching an initial clip ("first auxiliary feature") to one or more of the interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, by inserting a case-engaging arm ("tang") of the initial clip ("first auxiliary feature") into a depression ("recess"), like that disclosed by Pelz, a POSITA would be using a known technique to improve similar devices in the same way. (Ex. 1006 at 9-10: "without money clip," "with traditional money clip," "with spring-loaded money

clip;" Ex. 1008 at 1:12-14: "It generally is desirable to make the clips detachable so that the case can be used without them….")

686. For example, the teachings of Pelz are pertinent to multiple problems addressed by the inventor of the '808 Patent, including: an "unfulfilled need" for a compact wallet "void of any potentially snagging structural appendages;" and an objective "to provide a method for making a compact wallet with different features attached thereto which can be modularly exchanged." (Ex. 1001 at 2:1-4, 2:37-40; Ex. 1008 at 1:20-27: "It is among the objects of this invention to provide… a clip that lies close to the case, which has little tendency to catch on the clothing… and which is readily detachable from the case." In doing so, such a POSITA would have been applying this known method of enhancement to the compact wallet of Kane to yield predictable results.

687. The technique of configuring compact devices (*e.g.*, to be carried on a person) by removably inserting a case-engaging arm ("tang") of a clip ("auxiliary feature") into a depression ("recess") of the compact device was within the realm of ordinary capabilities of a POSITA based upon the teachings of at least Pelz. (Ex. 1008 at 1:20-27: "a clip that lies close the case… and which is readily detachable from the case;" 2:25-28, "3:72-4:15, FIGS. 1-2 and 8.) Further, a POSITA would have been capable of applying this known method of configuring the compact wallet of Kane to yield predictable results.

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688. The discussion of Claim 1 presented in Section IX.B.1.e is incorporated herein by reference. Further, the discussion of Claim 14 presented in Section IX.B.14.f is incorporated herein by reference.

689. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 19.

h. "removing, selectively, the first auxiliary feature;"

690. In my opinion, the Kane-Pelz combination discloses this limitation.

691. A POSITA, reading Pelz, would have been motivated to selectively remove the initial clip ("first auxiliary feature"), like that disclosed by Pelz, from the wallet to replace the initial clip ("first auxiliary feature") with another. For instance, a POSITA would have understood that a primary feature of rendering a clip **3** ("auxiliary feature") removable is the ability to swap the clip **3** ("auxiliary feature") for another if, for example, the clip **3** ("auxiliary feature") is damaged or a new clip **3** ("auxiliary feature") is desired. In other words, a POSITA would be motivated to remove a removably attached clip as doing so would be an exercise in the clip's intended function (i.e., the clip is removably attached so that it can be removed).

692. Moreover, a POSITA, reading Kane, would have been motivated to selectively remove a removable initial clip ("first auxiliary feature"), like that disclosed by Pelz, to advance the wallet personalization promoted by Kane and/or to remove the clip when not needed in accordance with the minimalist philosophy

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in the field of art and the teachings of Pelz. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 7: photographs thereof, 9-10: "without money clip… with traditional money clip… with spring-loaded money clip," and photographs thereof, 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences;" Ex. 1008 at 1:12-14: "It generally is desirable to make the clips detachable so that the case can be used without them….")

693. For example, Kane discloses wallets with and without money clips; thereby, demonstrating an apparent demand for various configurations to meet consumer preferences and/or uses. A POSITA would have been motivated to alter the configuration of a compact wallet by removing a removably attached initial clip ("first auxiliary feature") to make a wallet that meets one or more user preferences.

694. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 19.

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

695. In my opinion, both Kane and Pelz each disclose this limitation.

696. As discussed above in Section IX.B.18.f, both Kane and Pelz each disclose providing a clip ("auxiliary feature") having at least one tang. (Ex. 1006 at 4, 6-7, and 10-15: photographs thereof; Ex. 1008 at 1:28-2:7, 2:54-3:1, and FIGS. 1

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and 8.) For example, a POSITA, reading Pelz, would have understood the clip **2** to constitute the claimed "auxiliary feature," and the case-engaging arm **10** to constitute the claimed "tang." The discussion presented in Section IX.B.18.f is incorporated herein by reference.

697. Further, as discussed above in Section IX.B.18.h, a POSITA, reading Kane and/or Pelz, would have been motivated to replace an initial clip ("first auxiliary feature") with a substitute clip ("second auxiliary feature") to personalize the wallet, adapt the wallet to a given use preference, and/or perform a maintenance/repair operation. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange the outer plates for greater personalization," 9-10: "without money clip," "with traditional money clip," "with spring-loaded money clip;" Ex. 1008 at 1:12-14: "It generally is desirable to make the clips detachable so that the case can be used without them….")

698. In doing so, such a POSITA would be exercising the functionality inherent to a removably attached clip to promote one or more objectives suggested by Kane. Further, the substitute clip ("second auxiliary feature") would be a mere duplication of the initial clip ("first auxiliary feature") without any new or unexpected results.

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699. Thus, a POSITA would have understood a substitute clip, like the money clip disclosed by Kane or the clip **2** disclosed by Pelz, to constitute the claimed "second auxiliary feature."

700. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of claim 19.

j. "inserting, removably, the at least one tang of the second auxiliary feature into the at least one recess to make the second auxiliary feature available at an outside face of at least one of the two rigid plates,"

701. In my opinion, the Kane-Pelz combination discloses this limitation.

702. As discussed above in Section IX.B.18.g, Pelz discloses inserting, removably, the tang of a clip **2** ("auxiliary feature") into a depression **19** ("recess"). (Ex. 1008 at 3:61-64, 1:42-43, and FIGS. 1-8.) Further, a POSITA would have been motivated to insert, removably, the tang of a clip ("auxiliary feature") into a depression ("recess"), like that disclosed by Pelz, formed inside an interior plate-outer faceplate pair ("rigid plate") of a wallet, like that disclosed by Kane, to effectuate a removable clip that advances the personalization, adapted use, and/or maintenance operations described herein. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange the outer plates for greater personalization," (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 7: photographs

thereof, 9-10: "without money clip… with traditional money clip… with spring-loaded money clip," and photographs thereof, 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences;" Ex. 1008 at 1:12-14: "It generally is desirable to make the clips detachable so that the case can be used without them….")

703. In doing so, such a POSITA would make the initial clip ("first auxiliary feature") available to the outside face of the interior plate-outer faceplate pair ("rigid plate") in accordance with the common operation of a clip (*e.g.*, as evidenced by Kane and Pelz both disclosing clips made available to the outside of the respective containers). (Ex. 1006 at 6-7: photographs thereof; Ex. 1008 at FIGS. 1 and 8.) The discussion in Section IX.B.18.g is incorporated herein by reference.

704. Further, as discussed above in Section IX.B.18.h, a POSITA, reading Kane and/or Pelz, would have been motivated to replace an initial clip ("first auxiliary feature") with a substitute clip ("second auxiliary feature") to personalize the wallet, adapt the wallet to a given use preference, and/or perform a maintenance/repair operation. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange the outer plates for greater personalization," 9-10: "without money clip," "with traditional money clip," "with spring-loaded money clip;" Ex. 1008 at 1:12-14: "It

generally is desirable to make the clips detachable so that the case can be used without them….")

705. In doing so, such a POSITA would be exercising the functionality inherent to a removably attached clip to promote one or more objectives suggested by Kane. Further, insertion of the substitute clip ("second auxiliary feature") would be a mere duplication of the previous insertion step of the initial clip ("first auxiliary feature") without any new or unexpected results.

706. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of claim 19.

k. "the at least one recess having an undercut operable to engage a hook of the tang to prevent inadvertent dislodgement of the second auxiliary feature from the at least one recess,"

707. In my opinion, Pelz discloses this limitation.

708. Limitation "k" of Claim 19 does not delineate whether the "tang" is the tang of the first auxiliary feature or the tang of the second auxiliary feature. In my opinion, a POSITA would have understood the "tang" recited in limitation "k" of Claim 19 to be the tang of the second auxiliary feature given that said tang is claimed to prevent inadvertent dislodgement of the second auxiliary feature.

709. As discussed above in Section IX.B.13.g, with respect to limitation "g" of Claim 14, Pelz discloses a depression **19** ("recess") having one or more undercuts

(*e.g.*, defined by the sidewall of one or more pins **23**) operable to engage with one or more hooks (*e.g.*, defined by one or more side recesses of the case-engaging arm **10**) of the case-engaging arm **10** ("tang") to prevent inadvertent dislodgement of the clip **2** ("auxiliary feature") from the depression **19** ("recess"). (Ex. 1008 at 1:48-52, 3:72-4:15, and FIG. 8.)

710. Also discussed above in Section IX.B.13.g, with respect to limitation "g" of Claim 14, a POSITA would have looked to Pelz for guidance on how to removably attach a clip, such as a substitute clip ("second auxiliary feature"), to a compact wallet, like that disclosed by Kane, via a hook and undercut engagement in a depression ("recess"), like that disclosed by Pelz, because Pelz and Kane are in the similar technical fields, address similar problems, utilize similar devices, and disclose structural features that, when combined, function in the same manner as each does separately to yield predictable results, as set forth in Section IX.B.1.e; which is incorporated here by reference. (Ex. 1006 at 2-3, 5, 7-8, 10-11, and photographs thereof; Ex. 1008 at 1:1-4, 1:6-12, 2:39-45, FIGS. 1-2 and 8.)

711. For example, the teachings of Pelz are pertinent to multiple problems addressed by the inventor of the '808 Patent, including: an objective to provide modular auxiliary features, and an unfilled need for a compact wallet void of garment-snagging appendages. (Ex. 1001 at 2:37-40, and 2:1-5; Ex. 1008 at 1:12-

13, and 1:22-23.) In doing so, a POSITA would be using a known technique to improve similar devices in the same way.

712. Having reviewed Pelz, such a POSITA would have been motivated to removably attach a clip, such as a substitute clip ("second auxiliary feature"), via a hook and undercut engagement in a depression ("recess"), like that disclosed by Pelz, to an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, to provide a compact wallet that allows a consumer to remove the substitute clip ("second auxiliary feature") when not needed, in accordance with the minimalist preferences inherent to the compact wallet marketplace and the teachings of Pelz. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 7: photographs thereof, 9-10: "without money clip… with traditional money clip… with spring-loaded money clip," and photographs thereof, 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences;" Ex. 1008 at 1:12-14: "It generally is desirable to make the clips detachable so that the case can be used without them….")

713. Moreover, a POSITA would have had good reason to incorporate the teachings of Pelz into Kane, as discussed above, with a reasonable expectation of success to advance the maintenance operations promoted by Kane and discussed herein. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely

disassembled by the user to replace the elastic and exchange the outer plates for greater personalization," 6: "The Ridge 2.0 is available with two different types of money clips or without a clip," 9-10: photographs thereof, 15-16: "Our biggest challenge is… creating a product that is versatile enough to suit a wide range of people and preferences;" Ex. 1008 at 1:12-14: "It generally is desirable to make the clips detachable so that the case can be used without them….")

714. The discussion of Claim 14 presented in Section IX.B.13.g is incorporated herein by reference. Further, the discussion of Claim 1 presented in Section IX.B.1.h is incorporated herein by reference.

715. Accordingly, in my opinion, The Kane-Pelz combination discloses this limitation of Claim 19.

l. "the hook extending at an angle to the tang,"

716. In my opinion, the Kane-Pelz combination discloses this limitation.

717. Limitation "l" of Claim 19 does not delineate whether the "tang" is the tang of the first auxiliary feature or the tang of the second auxiliary feature. In my opinion, a POSITA would have understood the "tang" recited in limitation "l" of Claim 19 to be the tang of the second auxiliary feature given that antecedent basis for the "hook" is provided in limitation "k" of Claim 19, which in turn is understood to address the tang of second auxiliary feature.

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718. As discussed above in Sections IX.B.1.h (with respect to limitation "h" of Claim 1) and IX.B.13.h (with respect to limitation "h" of Claim 14), Pelz discloses one or more hooks (*e.g.*, defined by one or more recess **16** of the case-engaging arm **10**) extending at an angle to the case-engaging arm **10** ("tang") of the clip **2** ("auxiliary feature"). (Ex. 1008 at FIG. 8.) The discussions of Claim 1 presented in Section IX.B.1.h and of Claim 14 presented in Section IX.B.13.h are incorporated herein by reference.

719. For example, a POSITA would have been motivated to configure a compact wallet, like that disclosed by Kane, with a clip (auxiliary feature") having a case-engaging arm ("tang") with a hook extending therefrom, like that disclosed by Pelz, at least because Pelz and Kane are in the similar technical fields, address similar problems, utilize similar devices, and disclose structural features that, when combined, function in the same manner as each does separately to yield predictable results, as set forth in Section IX.B.1.e; which is incorporated here by reference. (Ex. 1006 at 2-3, 5, 7-8, 10-11, and photographs thereof; Ex. 1008 at 1:1-4, 1:6-12, 2:39-45, FIGS. 1-2 and 8.)

720. Further, the teachings of Pelz are pertinent to multiple problems addressed by the inventor of the '808 Patent, including: an "unfulfilled need" for a compact wallet "void of any potentially snagging structural appendages;" and an objective "to provide a method for making a compact wallet with different features

attached thereto which can be modularly exchanged." (Ex. 1001 at 2:1-4, 2:37-40; Ex. 1008 at 1:20-27: "It is among the objects of this invention to provide… a clip that lies close to the case, which has little tendency to catch on the clothing… and which is readily detachable from the case." In doing so, such a POSITA would have been applying this known method of enhancement to the compact wallet of Kane to yield predictable results.

721. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 19.

m. "the at least one recess receiving the tang being disposed inside at least one of the two rigid plates;"

722. In my opinion, the Kane-Pelz combination discloses this limitation.

723. As discussed above in Sections IX.B.1.f and IX.B.13.e, with respect to limitation "f" of Claim 1 and limitation "e" of Claim 14, Pelz discloses a depression **19** ("recess") formed inside a sidewall of the case **1**. (Ex. 1008 at 3:61-66, and FIG. 8.)

724. To the extent it was found that Pelz does not disclose the depression **19** ("recess") is formed inside a rigid plate, a POSITA would have been motivated to form a depression ("recess"), like that disclosed by Pelz, inside an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, to effectuate the removable attachment of a clip, such as an initial clip ("first auxiliary feature")

and/or a substitute clip ("second auxiliary feature"), because Kane and Pelz are in the similar technical fields, address similar problems, utilize similar devices, and disclose methods that when combined function in the same manner as each does separately to yield predictable results, as set forth in Section IX.B.1.e; which is incorporated here by reference. (Ex. 1006 at 2-3, 5, 7-8, 10-11, and photographs thereof; Ex. 1008 at 1:1-4, 1:6-12, 2:39-45, FIGS. 1-2 and 8.) In doing so, the POSITA would apply a known technique to a known device ready for improvement to yield predictable results.

725. Such a POSITA would have been motivated to form a depression ("recess"), like that disclosed by Pelz, inside an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, to provide a removably attachable clip while minimizing the profile of the wallet, which is described as a "core design" feature by Kane. (Ex. 1006 at 3: "Core Design: Low profile to easily fit in your front pocket.")

726. For example, a POSITA would be motivated to form a depression ("recess"), like that disclosed by Pelz, in an interior plate of an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, to effectuate the removable attachment of a clip ("auxiliary feature"), such as an initial clip ("first auxiliary feature") and/or a substitute clip ("second auxiliary feature"), to a compact wallet. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or

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without a clip," 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences;" Ex. 1007 at ¶¶ [0034], [0038]-[0039], and FIG. 1). Moreover, forming a depression ("recess), like that disclosed by Pelz, in an interior plate, like that disclosed by Kane, would be a mere continuation of one or more milling operations conducted to form the integrated elastic track ("grooves"). As such, forming a depression ("recess"), like that disclosed by Pelz, in an interior plate of a compact wallet, like that disclosed by Kane, would not require any additional machinery to manufacture, and minimal additional costs, if any. Such milling operations are routine and very familiar to a POSITA at the time of the Critical Date.

727. The discussions of Claim 1 presented in Section IX.B.1.f and of Claim 14 presented Section IX.B.13.e are incorporated herein by reference.

728. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 19.

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

729. In my opinion, Kane discloses this limitation.

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730. I explained earlier in Section IX.A.18.n that this limitation is disclosed by Kane. The discussion of Claim 19 presented in Section IX.A.18.n is incorporated herein by reference.

731. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 19.

19. Claim 20

a. "The method of claim 19, wherein the at least one recess has an undercut and the at least one tang has a hook,"

732. In my opinion, the Kane-Pelz discloses this limitation.

733. As set forth above, the Kane-Pelz combination discloses each and every limitation of Claim 19, and said discussion is incorporated herein by reference.

734. In my opinion, limitation "a" of Claim 20 is at least partially duplicative of limitation "k" of Claim 19. For example, a POSITA would understand "the at least one recess has an undercut," as recited in limitation "a" of Claim 20, to be equivalent to recitation of "the at least one recess having an undercut," as recited in limitation "k" of Claim 19. The discussion of Claim 19 presented in Section IX.B.18.k, is incorporated herein by reference.

735. Further, limitation "a" of Claim 20 fails to delineate whether "the at least one tang" is of the first auxiliary feature or of the second auxiliary feature. However, in my opinion, a POSITA would understand "the at least one tang" recited

in limitation "a" of Claim 20 to be of the first auxiliary feature; otherwise, limitation "a" of Claim 20 would be duplicative of limitations "i" and/or "j" of Claim 19.

736. Moreover, as discussed above in Section IX.B.1.g, Section IX.B.13.g, and Section IX.B.18.k, Pelz discloses one or more hooks (*e.g.*, defined by one or more side recesses of the case-engaging arm **10**) of a case-engaging arm **10** ("tang") of a clip **2** ("auxiliary feature"). (Ex. 1008 at 1:48-52, 3:73-4:15, and FIG. 8.) The following discussions are incorporated herein by reference: the discussion of Claim 1 presented in Section IX.B.1.g; the discussion of Claim 14 presented in Section IX.B.13.g; and the discussion of Claim 19 presented in Section IX.B.18.k.

737. A POSITA, reading Kane and/or Pelz, would have understood an initial clip ("first auxiliary feature") would have included one or more hooks, like that disclosed by Pelz. In doing so, the initial clip ("first auxiliary feature") and substitute clip ("second auxiliary feature") would merely be duplicative parts interchangeable without any new or unexpected results.

738. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 20.

b. "the hook and undercut interpositioned to secure the at least one auxiliary feature against inadvertent dislodgement."

739. In my opinion, Pelz discloses this limitation.

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740. Limitation "b" of Claim 20 fails to delineate whether "the hook" is the hook of the tang of the first auxiliary feature or the hook of the tang of the second auxiliary feature. However, in my opinion, a POSITA would understand "the hook" recited in limitation "b" of Claim 20 to be the hook of the tang of the first auxiliary feature; otherwise, limitation "b" of Claim 20 would be duplicative of limitation "k" of Claim 19.

741. As discussed in Section IX.B.1.i, Section IX.B.13.g, and Section IX.B.18.k, a POSITA, reading Pelz, would have understood the engagement of the hooks and undercuts to constitute an interpositioned arrangement that secures the associated clip **2** ("auxiliary feature") against inadvertent dislodgement. (Ex. 1008 at 1:48-52, 3:73-4:15, and FIG. 8.) The following discussions are incorporated herein by reference: the discussion of Claim 1 presented in Section IX.B.1.i; the discussion of Claim 14 presented in Section IX.B.13.g; and the discussion of Claim 19 presented in Section IX.B.18.k.

742. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 20.

20. Claim 21

a. "The method of claim 20, wherein at least one of the auxiliary features is a money clip."

743. In my opinion, Kane discloses this limitation.

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744. As set forth above, the Kane-Pelz combination discloses each and every limitation of Claim 20, and said discussion is incorporated herein by reference.

745. In my opinion, a POSITA would understand recitation of "at least one of the auxiliary features" to mean at least one of the first auxiliary feature and/or the second auxiliary feature. Kane discloses a "traditional money clip" and a "spring-loaded money clip." (Ex. 1006 at 4, 6-7, and 10-15.)

746. Moreover, a POSITA, reading Pelz, would understand that the same clip structure can be utilized to render a clip that attaches to garments or secures currency bills. In other words, a POSITA would understand that a clip, like that disclosed by Pelz, can constitute the claimed "money clip" (without any necessary structural alterations) should the user choose to secure money with the clip.

747. Accordingly, in my opinion, the Kane-Pelz combination discloses this limitation of Claim 21.

C. Ground 3: Claims 1-9 and 11-21 of the '808 Patent are rendered obvious under 35 U.S.C. §103 (post-AIA) by Kane in view of U.S. Patent Publication No. 2009/0134223 to Matthews *et al.* ("Matthews").

748. In my opinion, the Kane-Matthews combination discloses as a whole Claims 1-9 and 11-21 of the '808 Patent.

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1. Claim 1

a. "A compact wallet, comprising:"

749. I understand that a preamble of a claim is generally not limiting unless it gives life and meaning to a claim or provides necessary antecedent basis for terms appearing later in the claim.

750. This preamble recites the structural limitation, "compact wallet"; which is referenced later in the claim as "wallet". Even if the preamble were to be interpreted as limiting, in my opinion any limitation that may be found in the preamble is disclosed by Kane and by Matthews.

751. Kane discloses wallets that are compact. (Ex. 1006 at 2: "an extremely thin wallet that isn't limited in its capacity," 3: "[l]ow profile to easily fit in your front pocket.")

752. A POSITA reading Kane would understand that an extremely thin wallet that can fit in a front pants pocket constitutes a "compact wallet."

753. Likewise, Matthews discloses that an "objective is to provide a holder with the functionality described above which is compact… according to these and other objectives, the invention generally provides a compact, convenient device designed primarily for the storage of a wallet-sized card…." (Ex. 1009 at ¶¶ [0017], [0019].)

754. Accordingly, in my opinion, the Kane-Matthews combination discloses the preamble of Claim 1.

b. "at least two rigid plates interposed to sandwich card-like contents there between, each rigid plate having a longitudinal extent;"

755. In my opinion, Kane discloses this limitation.

756. I explained earlier in Section IX.A.1.b that this limitation is disclosed by Kane. For example, a POSITA, reading Kane, would have understood the two interior plate-outer faceplate pairs to constitute the "at least two rigid plates." The discussion of Claim 1 presented in Section IX.A.1.b is incorporated herein by reference.

757. In my opinion, Matthews also discloses this limitation.

758. Matthews discloses a compact card holder having a "case **1** [that] includes a front piece **2** and a back piece **3**…." (Ex. 1009 at ¶ [0029].) Further, card-like contents (*e.g.*, a credit card) are sandwiched between the front piece **2** and the back piece **3**. (*Id*. at FIG. 5.) Additionally, Matthews discloses that the case **1**, composed of the front piece **2** and back piece **3**, can me made of aluminum or stainless steel; which are materials known to be rigid. (*Id*. at ¶ [0037].) Thus, a POSITA, reading Matthews, would have understood the front piece **2** and the back piece **3** to constitute the claimed "rigid plates."

759. Moreover, Matthews depicts the front piece **2** and the back piece **3** as having a substantially rectangular shape, with a longitudinal extent thereof. For example:

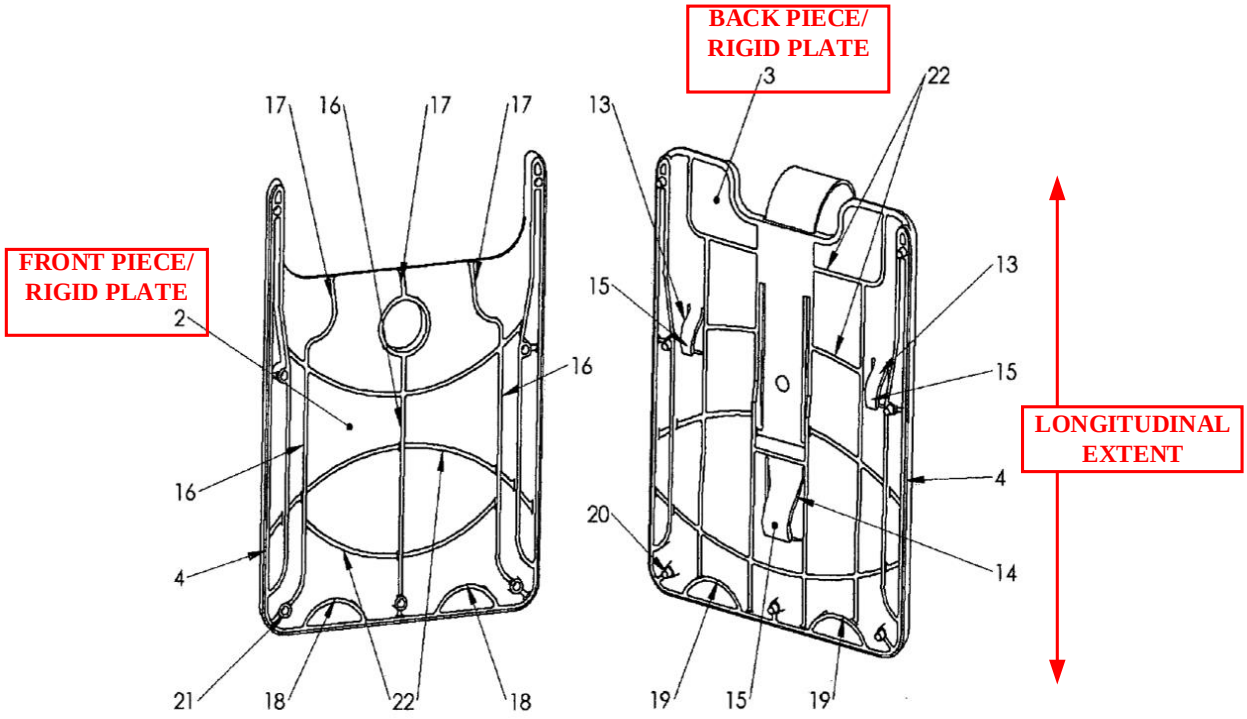


FIG 3

(*Id*. at FIG. 3 (*annotated*).)

760. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 1.

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c. "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;"

761. Kane discloses this limitation.

762. I explained earlier in Section IX.A.1.c that this limitation is disclosed by Kane. The discussion of Claim 1 presented in Section IX.A.1.c is incorporated herein by reference.

763. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 1.

d. "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"

764. In my opinion, Kane discloses this limitation.

765. I explained earlier in Section IX.A.1.d that this limitation is disclosed by Kane. For example, a POSITA, reading Kane, would have understood the integrated elastic track to constitute the claimed "channeling means." The discussion of Claim 1 presented in Section IX.A.1.d is incorporated herein by reference.

766. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 1.

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e. "an auxiliary feature removably attached to at least one of the at least two rigid plates,"

767. In my opinion, the Kane-Matthews combination discloses this limitation.

768. Matthew discloses "a clip **6** attached to the back piece **3**." (Ex. 1009 at ¶ [0029], FIGS. 1-5.) Additionally, Matthew discloses that the clip **6** is removable. (*Id*. at ¶ [0041]: "the clip is removable," Claims 2 and 5-6: "further including a removable clip mounted on the case," Abstract: "the clip is removable," FIGS. 1-5.) A POSITA, reading Matthews, would have understood the clip **6** to constitute the claimed "auxiliary feature."

769. Further, a POSITA would have looked to Matthews for guidance on how to removably attach a clip ("auxiliary feature"), like that disclosed by Matthews, to one or more of the interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, because Matthews and Kane are in the same technical field (*e.g.*, compact card holders), address similar problems, utilize similar devices, and disclose structural features that, when combined, function in the same manner as each does separately to yield predictable results.

770. Kane and Matthews both disclose innovations in the field of card holders. (Ex. 1006 at 2: "re-designed wallet system… providing an extremely thin wallet;" Ex. 1009 at ¶ [0019]: "the invention generally provides a compact, convenient device designed primarily for the storage of a wallet-sized card…."

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771. Kane and Matthews both address problems of regarding the operation of previously known card holder designs. (Ex. 1006 at 2: "The Ridge 2.0 [is] Designed to be an encompassing alternative to a bulky traditional leather wallet and a dedicated minimalist wallet that can only hold a few cards," 8: "[t]he Thumb indentation at the lower left of the wallet allows you to easily push your cards up and select the correct one… the inner plates are tapered to let you easily slide the additional cards into the wallet;" Ex. 1009 at ¶ [0006]: "there are many different methods of storing and locating wallet sized cards. However, most storage devices are not designed for fast, easy, convenient access….")

772. Kane and Matthews both utilize card holders with an external clip for additional functionality. (Ex. 1006 at 3: "expandable track that can accommodate a various number of cards," 4: "improved traditional money clip design… designed additional money clip with an internal spring (spring-loaded)," 5, 7, 10-14:photographs thereof; Ex. 1009 at ¶¶ [0029], [0033], [0041]: "this clip, when present, allows the holder to be mounted conveniently in many different places," FIGS. 1-5.)

773. Further, the interior plate-outer faceplate pairs ("rigid plates") disclosed by Kane function to secure the card-like contents of the wallet and provide RFID protection. (Ex. 1006 at 3: "block RFID-skimming devices… accommodate a various number of cards," 5: "[t]he Integrated Elastic Track can expand up to 12

cards and then immediately contract to hold a single card securely," photographs thereof, 8: "top of the inner plates are tapered to let you easily slide additional cards into the wallet… The Ridge's aluminum interior plates block RFID, keeping your information safe.") The removably attached clip ("auxiliary feature") disclosed by Matthews functions to allow the card holder case to be mounted at various locations (including on one's person) and/or be removed depending on the use-case. (Ex. 1009 at ¶ [0041]: "This clip, when present, allows the holder to be mounted conveniently in many different places… This design allows for secure retention of the clip but also for user assisted removal if desired.") When combined, the interior plate-outer faceplate pairs ("rigid plates") continue to secure the card-like contents in a predictable fashion, and the removably attached clip ("auxiliary feature") continues to render the card holder mountable at various locations (*e.g.*, on one's person).

774. By incorporating the teachings of Matthews into Kane, a POSITA would be using a known technique to improve similar devices in the same way. The technique of configuring compact card holders with an attached money clip ("auxiliary feature") that is removable was within the realm of ordinary capabilities of a POSITA based upon the teachings of at least Matthews. (Ex. 1009 at ¶¶ [0029], [0033], [0041], Claims 2 and 5-6, Abstract, FIGS. 1-5.) Further, a POSITA would have been capable of applying this known method of configuring the compact wallet of Kane to yield predictable results. (Ex. 1006 at 4: "improved traditional money

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clip design… designed additional money clip with an internal spring (spring-loaded),” photographs thereof.)

775. Having reviewed Matthews, such a POSITA would have been motivated to removably attach a clip (“auxiliary feature”), like that disclosed by Matthews, to one or more interior plate-outer faceplate pairs (“rigid plates”), like that disclosed by Kane, to provide a compact wallet that allows a consumer to remove the clip (“auxiliary feature”) when not needed, in accordance with the minimalist preferences inherent to the compact wallet marketplace. (Ex. 1006 at 6: “The Ridge 2 is available with two different types of money clips or without a clip,” 7: photographs thereof, 9-10: “without money clip… with traditional money clip… with spring-loaded money clip,” and photographs thereof, 15-16: “Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences;” Ex. 1009 at ¶ [0041]: “This design allows for secure retention of the clip but also for user assisted removal if desired. If removed, the holder may be mounted in still further possible locations by the use of adhesives, tape, hook and loop fasteners, magnets or an y other method of mounting which may be desired,” Abstract: “The clip is removable so that another means of attachment… may be used to attach the case to any desired location.”)

776. Moreover, a POSITA would have had good reason to incorporate the teachings of Matthews into Kane, as discussed above, with a reasonable expectation

of success to advance the maintenance operations promoted by Kane. For example, Kane discloses turning a wallet "into a 'system' that can be completely disassembled by the user to replace the elastic and exchange outer plates for greater personalization." (Ex. 1006 at 3.) Rendering a clip ("auxiliary feature") removable, as disclosed by Matthews, advances the disassembly and personalization of the wallets, as suggested by Kane. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange the outer plates for greater personalization," 6: "The Ridge 2.0 is available with two different types of money clips or without a clip," 9-10: photographs thereof, 15-16: "Our biggest challenge is… creating a product that is versatile enough to suit a wide range of people and preferences.")

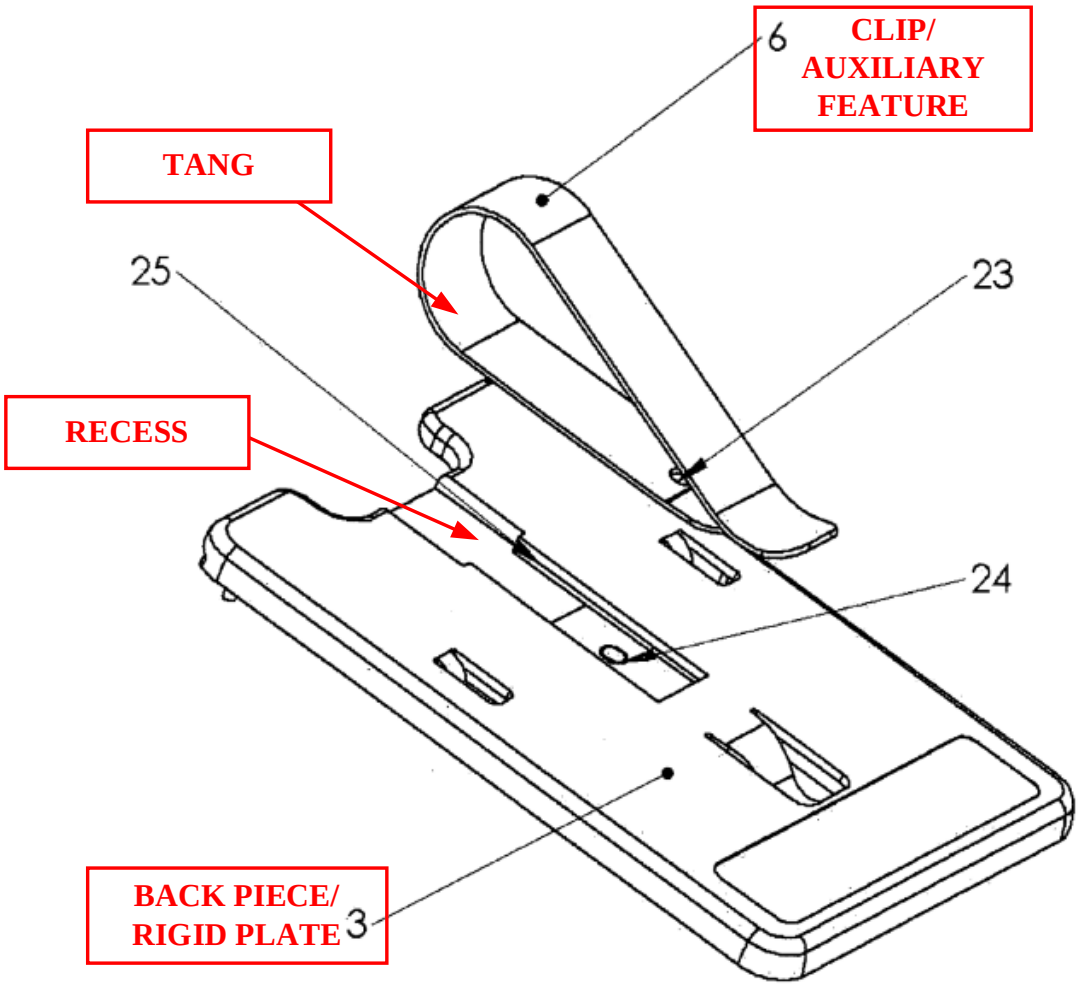
777. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 1.

f. "the auxiliary feature having a tang insertable into a recess formed inside the at least two rigid plates,"

778. In my opinion, the Kane-Matthews combination discloses this limitation.

779. Matthew depicts a clip **6** having a tang that is insertable into a recess formed inside the back piece **3** ("rigid plate") of the case **1**. (Ex. 1009 at ¶ [0033], FIGS. 1-5.) For example:

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(*Id*. at FIG. 4 (*annotated*).)

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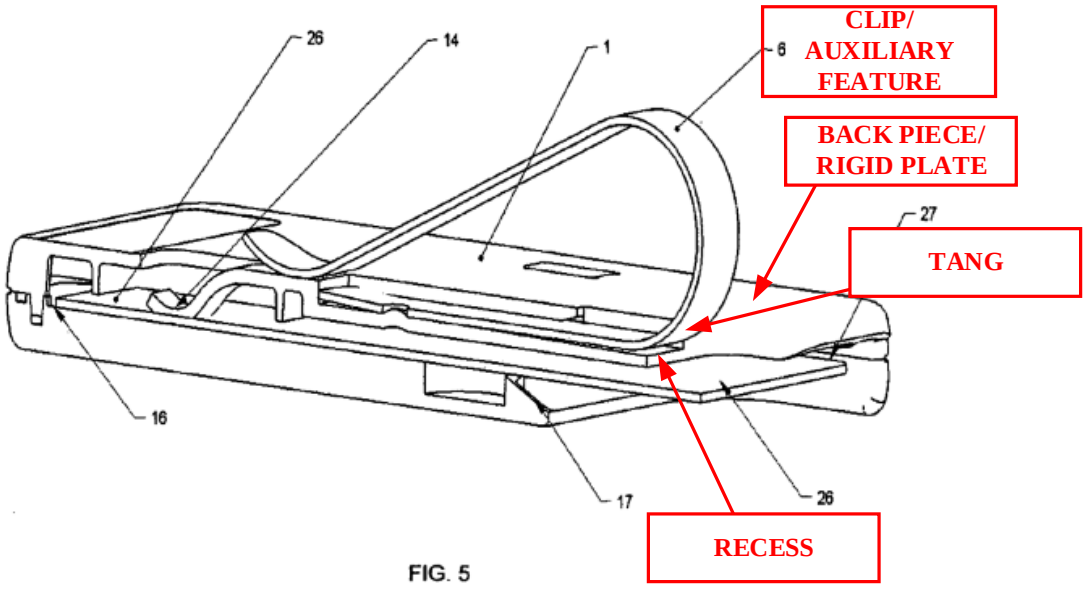


FIG. 5

(*Id*. at FIG. 5 (*annotated*).)

780. As shown above, a POSITA, reading Matthews, would have understood the recess that receives the tang of the clip **6** to be a groove having a sidewall that is adjacent to a longitudinally extending groove (*e.g.*, adjacent to the space for holding a card **26**). (*Id*.) Additionally, Matthews understood the recess, which receives the tang of the clip **6**, constitutes a surface groove that defines an indentation occurring in a surface of the back piece **3** ("rigid plate"). (*Id*.)

781. Further, a POSITA would have been motivated to form a recess, like that disclosed by Matthews, inside one or more of the interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, to effectuate the removable attachment of a clip ("auxiliary feature"), like that disclosed by Matthews and discussed above, because Kane and Matthews are in the same technical field (*e.g.*,

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compact card holders), address similar problems, utilize similar devices, and disclose methods that when combined function in the same manner as each does separately to yield predictable results, as set forth in Section IX.C.1.e; which is incorporated here by reference. (Ex. 1006 at 2-3, 5, 7-8, 10-11, 15-16, and photographs thereof; Ex. 1009 at ¶¶ [006], [0019], [0029], [0033], [0041], Claims 2 and 5-6, Abstract, FIGS. 1-5.) In doing so, the POSITA would apply a known technique to a known device ready for improvement to yield predictable results.

782. For example, a POSITA would be motivated to form a recess, like that disclosed by Matthews, in an outer faceplate of an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, to effectuate the removable attachment of a clip ("auxiliary feature") to compact wallet. (Ex. 1006 at 6: "The Ridge 2.0 is available with two different types of money clips or without a clip;" Ex. 1009 at ¶¶ [006], [0019], [0029], [0033], [0041], Claims 2 and 5-6, Abstract: "The clip is removable so that another means of attachment… may be used to attach the case to any desired location," FIGS. 1-5.) In doing so, the POSITA would thereby form a recess in the interior plate-outer faceplate pair ("rigid plate") into which the tang of the clip ("auxiliary feature") may be inserted.

783. Moreover, forming a recess, like that disclosed by Matthews, in an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, would be a mere continuation of one or more milling operations already employed to

manufacture the plates. As such, forming an recess, like that disclosed by Matthews, in an interior plate-outer faceplate pair ("rigid plate") of a compact wallet, like that disclosed by Kane, would not require any additional machinery to manufacture, and minimal additional costs, if any. Such milling operations are routine and very familiar to a POSITA at the time of the Critical Date.

784. Accordingly, the Kane-Matthews combination discloses this limitation of Claim 1.

g. "the tang having a hook,"

785. In my opinion, the Kane-Matthews combination discloses this limitation.

786. Mattew discloses that "the clip is removable, as it is retained by a small post on the back case part and a corresponding hole in the clip." (Ex. 1009 at ¶ [0041].) Additionally, Matthews describes the small post as a protrusion **24**. (*Id*. at ¶ [0033].) For example:

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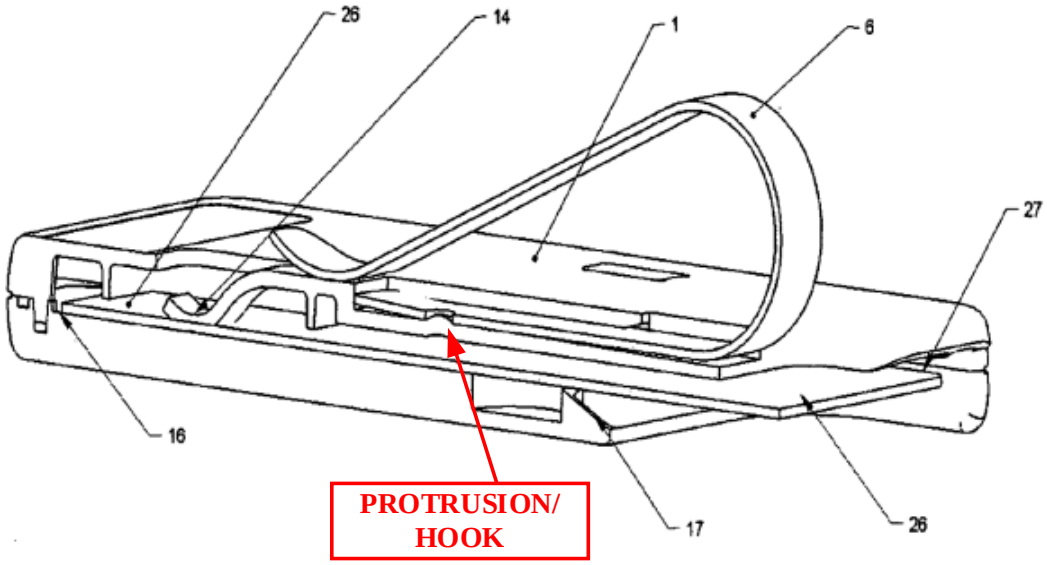


FIG. 5

(*Id.* at FIG. 5 (*annotated*).)

787. In my opinion, a POSITA, reading Matthews, would have understood the protrusion **24** to constitute the claimed "hook." For example, the protrusion **24** (aka "small post") abruptly changes direction from the trunk section from which it extends. Further, the protrusion **24** defines a ledge (*e.g.*, sidewall) for catching and/or holding (*Id*. at FIGS. 4-5.) Additionally, a POSITA, reading Matthews, would have understood the protrusion **24** to be a curved or bent device for catching or holding. (*Id*.)

788. To the extent that the protrusion **24** is not found to be of the tang; a POSITA, reading Matthews, would have understood that the position of the protrusion **24** on the back piece **3** versus the tang of the clip **6** is a mere design choice.

In my opinion, re-locating the protrusion **24** to the tang of the clip **6** and the corresponding hole **23** to the back piece **3** would be an obvious rearrangement of parts with a reasonable, predictable expectation of success. For example, the protrusion **24** and corresponding hole **23** function the same as the claimed hook and undercut, whether positioned as illustrated in Matthews or as recited in the Challenged Claims. (Ex. 1001 at 5:29-31: "The hook **36** engages the undercut **35** to prevent inadvertent dislodgement of the auxiliary feature **30** when attached to the compact wallet **1**;" Ex. 1009 at ¶ [0041]: "the clip is removable, as it is retained by a small post on the back case part and a corresponding hole in the clip. This combination provides sufficient retention force to retain the clip against common loads during normal use, but can be overcome by prying or transverse force (although one which may be applied with a person's hands) to allow the clip to be removed.")

789. Further, in my opinion, the rearrangement of the protrusion **24** to the tang of the clip **6** and the corresponding hole **23** to the back piece **3** would achieve an equivalent apparatus, and thereby be within the scope of Matthew's invention. (Ex. 1009 at ¶ [0038]: "it is recognized that departures can be made therefrom within the scope of the invention, which is not limited to the details disclosed herein but is to be accorded the full scope of the claims so as to embrace any and all equivalent

apparatus and procedures.") Additionally, the aforementioned rearrangement can be employed without requiring new machinery or manufacturing techniques.

790. A POSITA would have been motivated to configure a compact wallet, like that disclosed by Kane, with a clip ("auxiliary feature") having a protrusion ("hook"), like that disclosed by Matthews, to effectuate the removable attachment of the clip ("auxiliary feature"), because Kane and Matthews are in the same technical field (*e.g.*, compact card holders), address similar problems, utilize similar devices, and disclose methods that when combined function in the same manner as each does separately to yield predictable results, as set forth in Section IX.C.1.e; which is incorporated here by reference. (Ex. 1006 at 2-3, 5, 7-8, 10-11, 15-16, and photographs thereof; Ex. 1009 at Ex. 1009 at ¶¶ [006], [0019], [0029], [0033], [0041], Claims 2 and 5-6, Abstract, FIGS. 1-5.) In doing so, the POSITA would apply a known technique to a known device ready for improvement to yield predictable results.

791. Such a POSITA would have been motivated to configure a compact wallet, like that disclosed by Kane, with a clip ("auxiliary feature") having a tang with a protrusion ("hook"), like that disclosed by Matthews, to enable a consumer to remove the clip when not needed, in accordance with the minimalist preferences inherent to the compact wallet marketplace. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 7: photographs thereof,

9-10: “without money clip… with traditional money clip… with spring-loaded money clip,” and photographs thereof, 15-16: “Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences;” Ex. 1009 at ¶ [0041]: “This design allows for secure retention of the clip but also for user assisted removal if desired. If removed, the holder may be mounted in still further possible locations by the use of adhesives, tape, hook and loop fasteners, magnets or an y other method of mounting which may be desired,” Abstract: “The clip is removable so that another means of attachment… may be used to attach the case to any desired location.”)

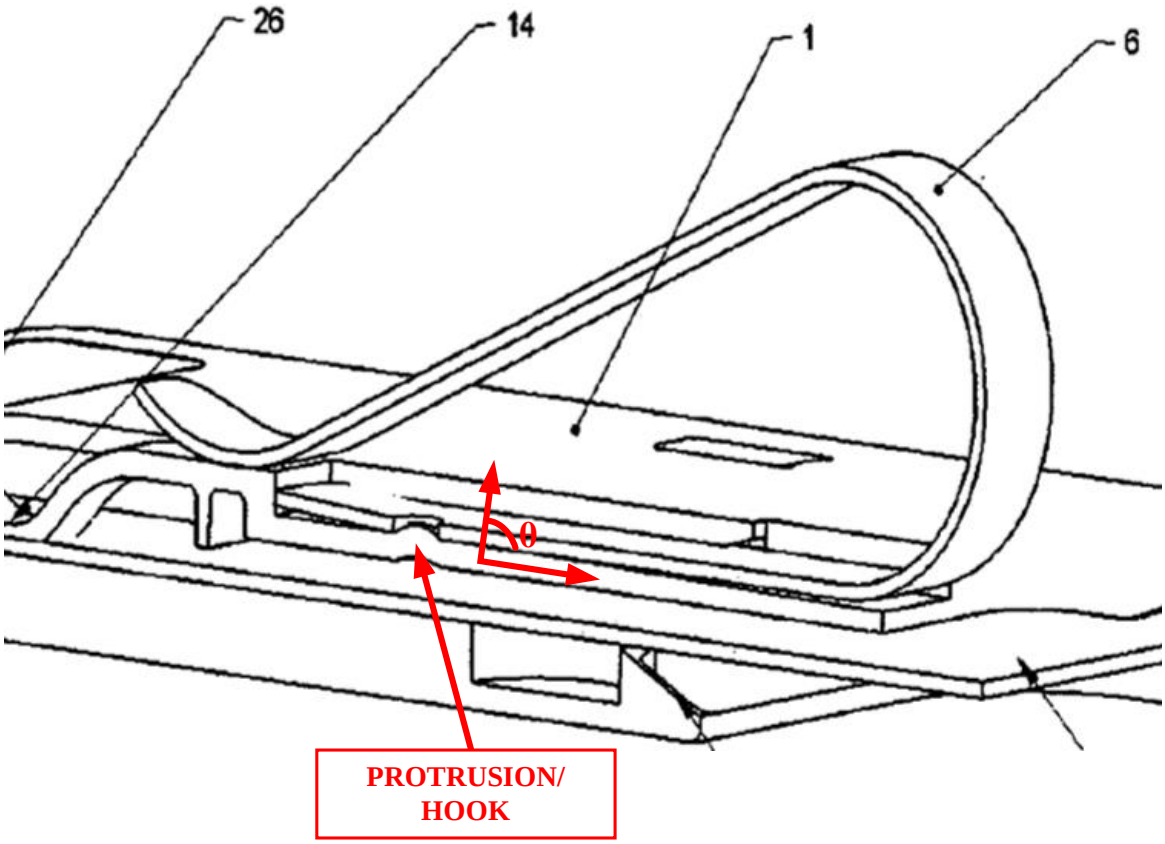
792. Moreover, a POSITA would have had good reason to incorporate the teachings of Matthews into Kane, as discussed above, with a reasonable expectation of success to advance the maintenance operations promoted by Kane. For example, Kane discloses turning a wallet “into a ‘system’ that can be completely disassembled by the user to replace the elastic and exchange outer plates for greater personalization.” (Ex. 1006 at 3.) Rendering the clip (“auxiliary feature”) removable via attachment by a hook, as disclosed by Matthews, advances the disassembly and personalization of the wallets, as suggested by Kane. (Ex. 1006 at 15-16: “Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences.”)

793. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 1.

h. "the hook extending at an angle to the tang,"

794. In my opinion, the Kane-Matthews combination discloses this limitation.

795. Matthews discloses the protrusion **24** ("hook") extending at an angle to catch a corresponding hole **23** for retaining the position of the clip **6** ("auxiliary feature") on the back piece 3 ("rigid plate"). (Ex. 1009 at ¶¶ [0033], [0041], FIG. 5.) Provided below is magnified portion of FIG. 5, annotated in red to delineate the angle at which the protrusion **24** ("hook") extends therebetween (θ).



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(*Id*. at FIG. 5 (*magnified, annotated*).)

796. In my opinion, where the protrusion **24** is rearranged to extend from the tang of the clip **6**; the protrusion **24** would extend from the tang at an angle in the same manner as the protrusion **24** is depicted extending at angle from the back piece **3**.

797. Moreover, to the extent that the hooks are found not to extend at the nearly perpendicular angle shown above, a POSITA would have understood that a degree to the "angle" is not recited in limitation "h" of Claim 1.

798. A POSITA would have been motivated to configure a compact wallet, like that disclosed by Kane, with a clip having a tang with a protrusion ("hook") extending at an angle therefrom, like that disclosed by Matthews, to achieve a removable clip because Kane and Matthews are in the same technical field (*e.g.*, compact card holders), address similar problems, utilize similar devices, and disclose methods that when combined function in the same manner as each does separately to yield predictable results, as set forth in Section IX.C.1.e; which is incorporated here by reference. (Ex. 1006 at 2-3, 5, 7-8, 10-11, 15-16, and photographs thereof; Ex. 1009 at Ex. 1009 at ¶¶ [006], [0019], [0029], [0033], [0041], Claims 2 and 5-6, Abstract, FIGS. 1-5.) In doing so, the POSITA would apply a known technique to a known device ready for improvement to yield predictable results.

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799. Such a POSITA would have been motivated to configure a compact wallet, like that disclosed by Kane, with a clip having a tang with a protrusion ("hook") extending at an angle therefrom, like that disclosed by Matthews, to achieve a removable attachment of the clip that allows a consumer to remove the clip when not needed, in accordance with the minimalist preferences inherent to the compact wallet marketplace. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 7: photographs thereof, 9-10: "without money clip… with traditional money clip… with spring-loaded money clip," and photographs thereof, 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences;" Ex. 1009 at ¶ [0041]: "This design allows for secure retention of the clip but also for user assisted removal if desired. If removed, the holder may be mounted in still further possible locations by the use of adhesives, tape, hook and loop fasteners, magnets or an y other method of mounting which may be desired," Abstract: "The clip is removable so that another means of attachment… may be used to attach the case to any desired location.")

800. Moreover, a POSITA would have had good reason to incorporate the teachings of Matthews into Kane, as discussed above, with a reasonable expectation of success to advance the maintenance operations promoted by Kane. For example, Kane discloses turning a wallet "into a 'system' that can be completely disassembled

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by the user to replace the elastic and exchange outer plates for greater personalization." (Ex. 1006 at 3.) Utilizing a hook extending at an angle to the tang of the clip ("auxiliary feature"), as disclosed by Matthews, facilitates removable attachment of the clip ("auxiliary feature") and advances the disassembly and personalization of the wallets, as suggested by Kane. (Ex. 1006 at 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences.")

801. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 1.

i. "the hook engaging an undercut of the recess to prevent inadvertent dislodgement of the auxiliary feature from the recess,"

802. In my opinion, the Kane-Mathews combination discloses this limitation.

803. Matthew discloses "the clip is removable, as it is retained by a small post on the back case part and a corresponding hole in the clip. This combination provides sufficient retention force to retain the clip against common loads during normal use, but can be overcome by a prying or transverse force (although one which may be applied with a person's hands) to allow the clip to be removed." (Ex. 1009 at ¶ [0041], FIG. 5.) Additionally, Matthews discloses "[a] hole on the clip **23** is

pushed up over a protrusion **24** in the back piece for retention." (*Id*. at ¶ [0033].) For example:

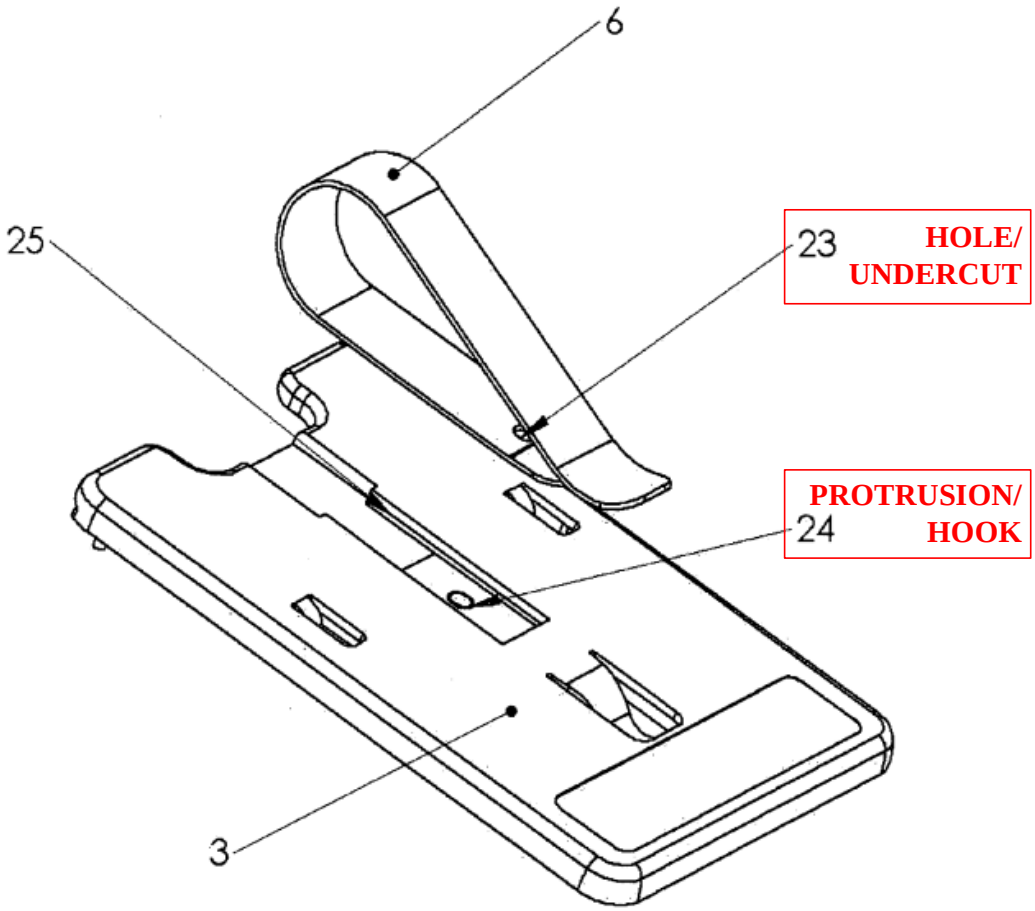
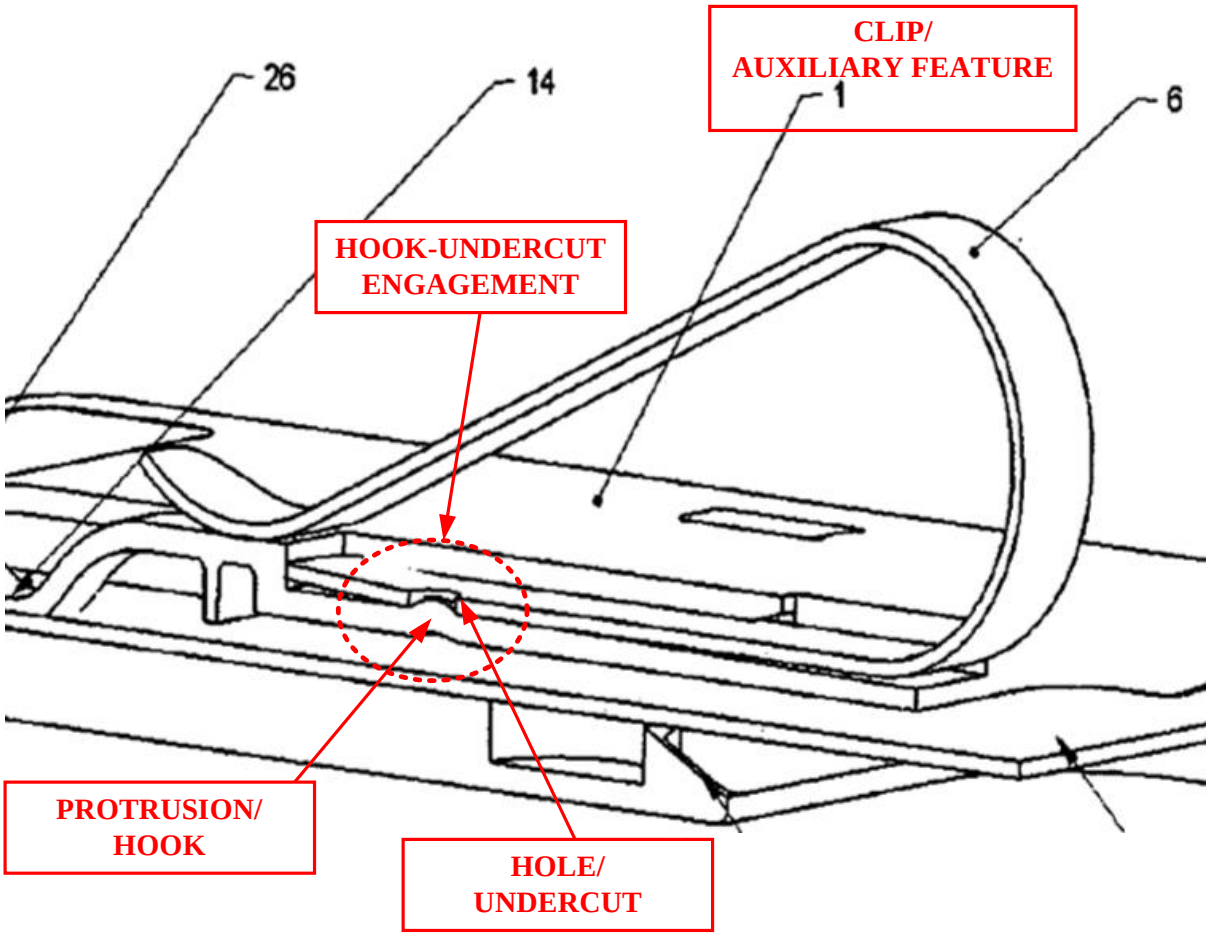


FIG. 4

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(*Id*. at FIG. 4 (*annotated*).)



(*Id*. at FIG. 5 (*annotated*).)

804. As discussion above in Section IX.C.1.g, a POSITA, in my opinion, would have found it an obvious design choice to rearrange the protrusion **24** ("hook") and hole **23** ("undercut") such that the protrusion **24** extends from the tang of the clip **6** and the hole **23** is located in the recess on the back piece **3**. The discussion of limitation "g" in Section IX.C.1.g is incorporated here by reference.

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805. A POSITA reading Matthews would have understood the hole **23** to constitute the claimed "undercut." While located in the recess on the back piece **3**, the hole **23** constitutes a cut away portion from the sidewall of the recess. Additionally, the hole **23**, as rearranged, constitutes an underside recess that is either cut or molded into back piece **3** to at least partially define a lip or protuberance. (*Id*.)

806. A POSITA would have been motivated to use a protrusion ("hook") and hole ("undercut") engagement to prevent inadvertent dislodgement of a clip ("auxiliary feature"), like that disclosed by Matthews, on a compact wallet, like that disclosed by Kane, because Kane and Matthews are in the same technical field (*e.g.*, compact card holders), address similar problems, utilize similar devices, and disclose methods that when combined function in the same manner as each does separately to yield predictable results, as set forth in Section IX.C.1.e; which is incorporated here by reference. (Ex. 1006 at 2-3, 5, 7-8, 10-11, 15-16, and photographs thereof; Ex. 1009 at Ex. 1009 at ¶¶ [006], [0019], [0029], [0033], [0041], Claims 2 and 5-6, Abstract, FIGS. 1-5.) In doing so, the POSITA would apply a known technique to a known device ready for improvement to yield predictable results.

807. Such a POSITA would have been motivated to use a protrusion ("hook") and hole ("undercut") engagement to prevent inadvertent dislodgement of a clip ("auxiliary feature"), like that disclosed by Matthews, on a compact wallet,

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like that disclosed by Kane, to enable a consumer to remove the clip ("auxiliary feature") when not needed, in accordance with the minimalist preferences inherent to the compact wallet marketplace. … (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 7: photographs thereof, 9-10: "without money clip… with traditional money clip… with spring-loaded money clip," and photographs thereof, 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences;" Ex. 1009 at ¶ [0041]: "This design allows for secure retention of the clip but also for user assisted removal if desired. If removed, the holder may be mounted in still further possible locations by the use of adhesives, tape, hook and loop fasteners, magnets or an y other method of mounting which may be desired," Abstract: "The clip is removable so that another means of attachment… may be used to attach the case to any desired location.")

808. Moreover, a POSITA would have had good reason to incorporate the teachings of Matthews into Kane, as discussed above, with a reasonable expectation of success to advance the maintenance operations promoted by Kane. For example, Kane discloses turning a wallet "into a 'system' that can be completely disassembled by the user to replace the elastic and exchange outer plates for greater personalization." (Ex. 1006 at 3.) Rendering the clip ("auxiliary feature") removable by a hook and undercut engagement, as disclosed by Matthews, advances the

disassembly and personalization of the wallets, as suggested by Kane. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences.")

809. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 1.

j. "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."

810. I explained earlier in Section IX.A.1.j that this limitation is disclosed by Kane. The discussion of Claim 1 presented in Section IX.A.1.j is incorporated herein by reference.

811. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 1.

2. Claim 2

a. "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,"

812. In my opinion, Kane discloses this limitation.

813. As set forth above, the Kane-Matthews combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

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814. I explained earlier in Section IX.A.2.a that this limitation is disclosed by Kane. The discussion of Claim 2 presented in Section IX.A.2.a is incorporated herein by reference.

815. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 2.

b. "the groove slidingly receiving one part of the at least one encircling elastic band."

816. In my opinion, Kane discloses this limitation.

817. As set forth above, the Kane-Matthews combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

818. I explained earlier in Section IX.A.2.b that this limitation is disclosed by Kane. The discussion of Claim 2 presented in Section IX.A.2.b is incorporated herein by reference.

819. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 2.

3. Claim 3

a. "The compact wallet of claim 2, wherein a second lamina of the laminate constructions 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."

820. In my opinion, Kane discloses this limitation.

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821. As set forth above, the Kane-Matthews combination discloses each and every limitation of Claim 2, and said discussion is incorporated herein by reference.

822. I explained earlier in Section IX.A.3.a that this limitation is disclosed by Kane. The discussion of Claim 3 presented in Section IX.A.3.a is incorporated herein by reference.

823. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 3.

4. Claim 4

a. "The compact wallet of claim 3, wherein the second lamina is attached to the first lamina by screws."

824. In my opinion, Kane discloses this limitation.

825. As set forth above, the Kane-Matthews combination discloses each and every limitation of Claim 3, and said discussion is incorporated herein by reference.

826. I explained earlier in Section IX.A.4.a that this limitation is disclosed by Kane. The discussion of Claim 4 presented in Section IX.A.4.a is incorporated herein by reference.

827. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 4.

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5. Claim 5

a. "The compact wallet of claim 3, wherein the second lamina is attached to the first lamina by pressure sensitive adhesive means."

828. In my opinion, a POSITA, reading Kane, would have found it obvious to use pressure sensitive adhesive to attach the outer faceplate ("second lamina") to the interior plate ("first lamina").

829. As set forth above, the Kane-Matthews combination discloses each and every limitation of Claim 3, and said discussion is incorporated herein by reference.

830. I explained earlier in Section IX.A.5.a that this limitation is disclosed by Kane. The discussion of Claim 5 presented in Section IX.A.5.a is incorporated herein by reference.

831. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 5.

6. Claim 6

a. "The compact wallet of claim 1, wherein each rigid plate is comprised of metal for RFID protection."

832. In my opinion, Kane discloses this limitation.

833. As set forth above, the Kane-Matthews combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

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834. I explained earlier in Section IX.A.6.a that this limitation is disclosed by Kane. The discussion of Claim 6 presented in Section IX.A.6.a is incorporated herein by reference.

835. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 6.

7. Claim 7

a. "The compact wallet of claim 1, wherein each rigid plate is metalized for RFID protection."

836. In my opinion, Kane discloses this limitation.

837. As set forth above, the Kane-Matthews combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

838. I explained earlier in Section IX.A.7.a that this limitation is disclosed by Kane. The discussion of Claim 7 presented in Section IX.A.7.a is incorporated herein by reference.

839. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 7.

8. Claim 8

a. "The compact wallet of claim 3, wherein at least one of the first or second lamina of each rigid plate is comprised of metal."

840. In my opinion, Kane discloses this limitation.

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841. As set forth above, the Kane-Matthews combination discloses each and every limitation of Claim 3, and said discussion is incorporated herein by reference.

842. I explained earlier in Section IX.A.8.a that this limitation is disclosed by Kane. The discussion of Claim 8 presented in Section IX.A.8.a is incorporated herein by reference.

843. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 8.

9. Claim 9

a. "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,"

844. In my opinion, Kane discloses this limitation.

845. As set forth above, the Kane-Matthews combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

846. I explained earlier in Section IX.A.9.a that this limitation is disclosed by Kane. The discussion of Claim 9 presented in Section IX.A.9.a is incorporated herein by reference.

847. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 9.

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b. "the positioning functioning to retain the card-like contents from that end."

848. In my opinion, Kane discloses this limitation.

849. As set forth above, the Kane-Matthews combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

850. I explained earlier in Section IX.A.9.b that this limitation is disclosed by Kane. The discussion of Claim 9 presented in Section IX.A.9.b is incorporated herein by reference.

851. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 9.

10. Claim 11

a. "The compact wallet of claim 1, wherein the card-like contents comprise one or more of a credit card, a driver's license, an ID card, a business card, an affiliation card, a currency bill, a loyalty card, a coupon, a receipt or a personal paper."

852. In my opinion, both Kane and Matthews each disclose this limitation.

853. As set forth above, the Kane-Matthews combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

854. I explained earlier in Section IX.A.10.a that this limitation is disclosed by Kane. The discussion of Claim 11 presented in Section IX.A.10.a is incorporated herein by reference.

855. In my opinion, Matthews also discloses this limitation.

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856. Matthews discloses " [t]he invention generally relates to a card holder that stores wallet-sized cards… As used herein, the term 'wallet-size cards' is meant to include any card, such as cash, debit, gift, credit, license…." (Ex. 1009 at ¶ ¶ [0027]-[0028].)

857. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 11.

11. Claim 12

a. "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,"

858. In my opinion, Kane discloses this limitation.

859. As set forth above, the Kane-Matthews combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

860. I explained earlier in Section IX.A.11.a that this limitation is disclosed by Kane. The discussion of Claim 12 presented in Section IX.A.11.a is incorporated herein by reference.

861. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 12.

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b. "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."

862. In my opinion, Kane discloses this limitation.

863. As set forth above, the Kane-Matthews combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

864. I explained earlier in Section IX.A.11.b that this limitation is disclosed by Kane. The discussion of Claim 12 presented in Section IX.A.11.b is incorporated herein by reference.

865. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 12.

12. Claim 13

a. "The compact wallet of claim 1, wherein the encircling elastic band is comprised of woven elastic fabric."

866. In my opinion, Kane discloses this limitation.

867. As set forth above, the Kane-Matthews combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

868. I explained earlier in Section IX.A.12.a that this limitation is disclosed by Kane. The discussion of Claim 13 presented in Section IX.A.12.a is incorporated herein by reference.

869. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 13.

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13. Claim 14

a. "A compact wallet, comprising:"

870. As discussed above in Section IX.C.1.a, with respect to limitation "a" of Claim 1, both Kane and Mathews each disclose a compact wallet. (Ex. 1006 at 2-3; Ex. 1009 at (Ex. 1009 at ¶¶ [0017], [0019], FIGS. 1-5.) The discussion of Claim 1 presented in Section IX.C.1.a is incorporated herein by reference.

871. Accordingly, in my opinion, the Kane-Matthews combination discloses the preamble of Claim 14.

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

872. In my opinion, Kane discloses this limitation.

873. I explained earlier in Section IX.A.13.b that this limitation is disclosed by Kane. For example, a POSITA, reading Kane, would have understood the two interior plate-outer faceplate pairs to constitute the claimed "at least two rigid plates," and the integrated elastic track to constitute the "groove."

874. The discussion of Claim 14 presented in Section IX.A.13.b is incorporated herein by reference.

875. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 14.

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c. "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,"

876. In my opinion, Kane discloses this limitation.

877. I explained earlier in Section IX.A.13.c that this limitation is disclosed by Kane. The discussion of Claim 14 presented in Section IX.A.13.c is incorporated herein by reference.

878. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 14.

d. "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"

879. In my opinion, Kane discloses this limitation.

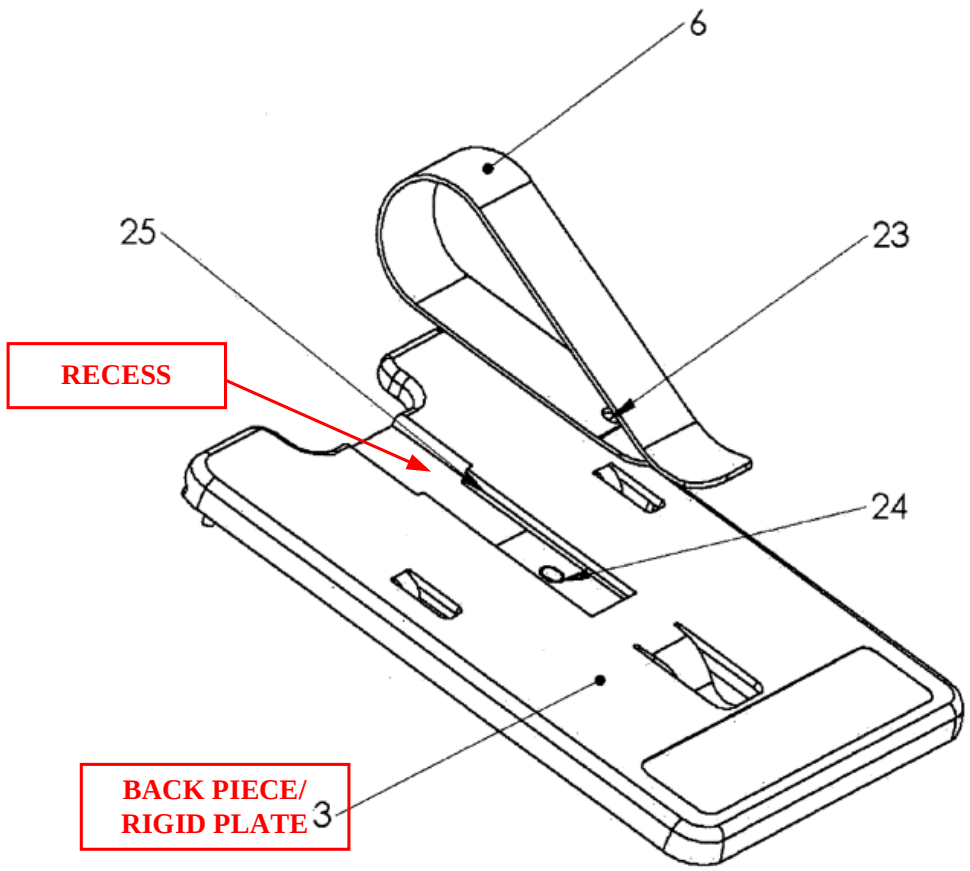
880. I explained earlier in Section IX.A.13.d that this limitation is disclosed by Kane. The discussion of Claim 14 presented in Section IX.A.13.d is incorporated herein by reference.

881. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 14.

e. "a recess formed inside at least one of the at least two rigid plates,"

882. In my opinion, the Kane-Matthews combination discloses this limitation.

883. As discussed above in Section IX.C.1.f, regarding limitation "f" of Claim 1, Mattews discloses a recess formed inside the back piece **3**. (Ex. 1009 at ¶ [0033], FIGS. 1-5.) For example:



(*Id*. at FIG. 4 (*annotated*).)

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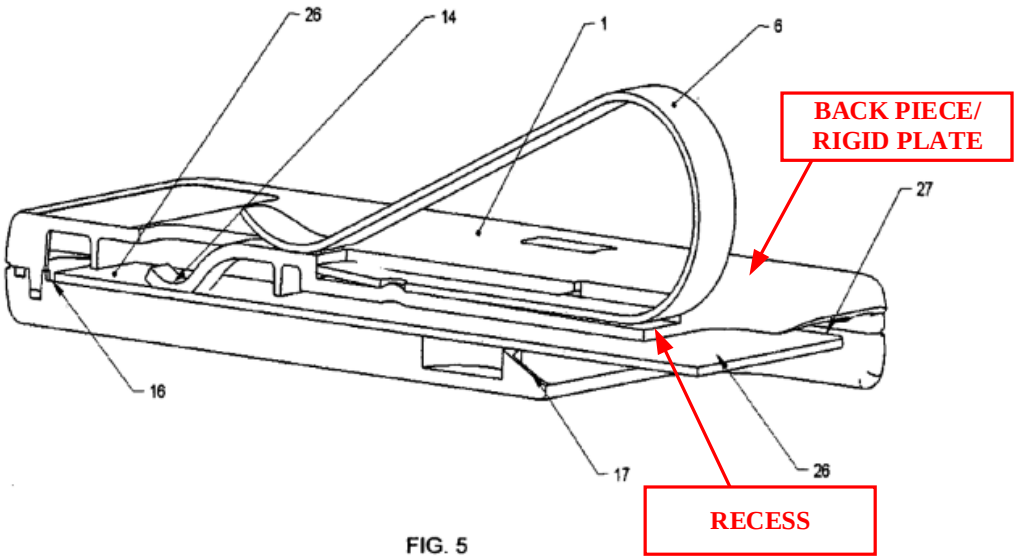


FIG. 5

(*Id*. at FIG. 5 (*annotated*).)

884. The discussion of Claim 1 presented in Section IX.C.1.f is incorporated herein by reference.

885. Further, a POSITA would have been motivated to form a recess, like that disclosed by Matthews, inside one or more of the interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, to effectuate the removable attachment of a clip ("auxiliary feature"), like that disclosed by Matthews and discussed above, because Kane and Matthews are in the same technical field (*e.g.*, compact card holders), address similar problems, utilize similar devices, and disclose methods that when combined function in the same manner as each does separately to yield predictable results, as set forth in Section IX.C.1.e; which is incorporated here by reference. (Ex. 1006 at 2-3, 5, 7-8, 10-11, 15-16, and

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photographs thereof; Ex. 1009 at Ex. 1009 at ¶¶ [0006], [0019], [0029], [0033], [0041], Claims 2 and 5-6, Abstract, FIGS. 1-5.) In doing so, the POSITA would apply a known technique to a known device ready for improvement to yield predictable results.

886. Additionally, such a POSITA would have been motivated to form a recess, like that disclosed by Matthews, inside an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, to provide a removably attachable clip ("auxiliary feature") while minimizing the profile of the wallet, which is described as a "core design" feature by Kane. (Ex. 1006 at 3: "Core Design: Low profile to easily fit in your front pocket.").

887. Moreover, forming a recess, like that disclosed by Matthews, in an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, would be a mere continuation of one or more milling operations already employed to manufacture the plates. As such, forming an recess, like that disclosed by Matthews, in an interior plate-outer faceplate pair ("rigid plate") of a compact wallet, like that disclosed by Kane, would not require any additional machinery to manufacture, and minimal additional costs, if any. Such milling operations are routine and well within the ordinary capabilities of a POSITA at the time of the Critical Date.

888. Further, such a POSITA would have been motivated to form an recess, like that disclosed by Matthews, inside one or more of the interior plate-outer

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faceplate pairs ("rigid plates"), like that disclosed by Kane, to effectuate removable attachment of a clip in order to provide a compact wallet that allows a consumer to remove the clip when not needed, in accordance with the minimalist preferences inherent to the compact wallet marketplace. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 7: photographs thereof, 9-10: "without money clip… with traditional money clip… with spring-loaded money clip," and photographs thereof, 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences;" Ex. 1009 at ¶ [0041]: "This design allows for secure retention of the clip but also for user assisted removal if desired. If removed, the holder may be mounted in still further possible locations by the use of adhesives, tape, hook and loop fasteners, magnets or an y other method of mounting which may be desired," Abstract: "The clip is removable so that another means of attachment… may be used to attach the case to any desired location.")

889. Moreover, a POSITA would have had good reason to incorporate the teachings of Matthews into Kane, as discussed above, with a reasonable expectation of success to advance the maintenance operations promoted by Kane. For example, Kane discloses turning a wallet "into a 'system' that can be completely disassembled by the user to replace the elastic and exchange outer plates for greater personalization." (Ex. 1006 at 3.) Forming a recess, like that disclosed by Matthews,

into one or more interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, to employ a removable clip would advance the disassembly and personalization of the wallets, as suggested by Kane. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences.")

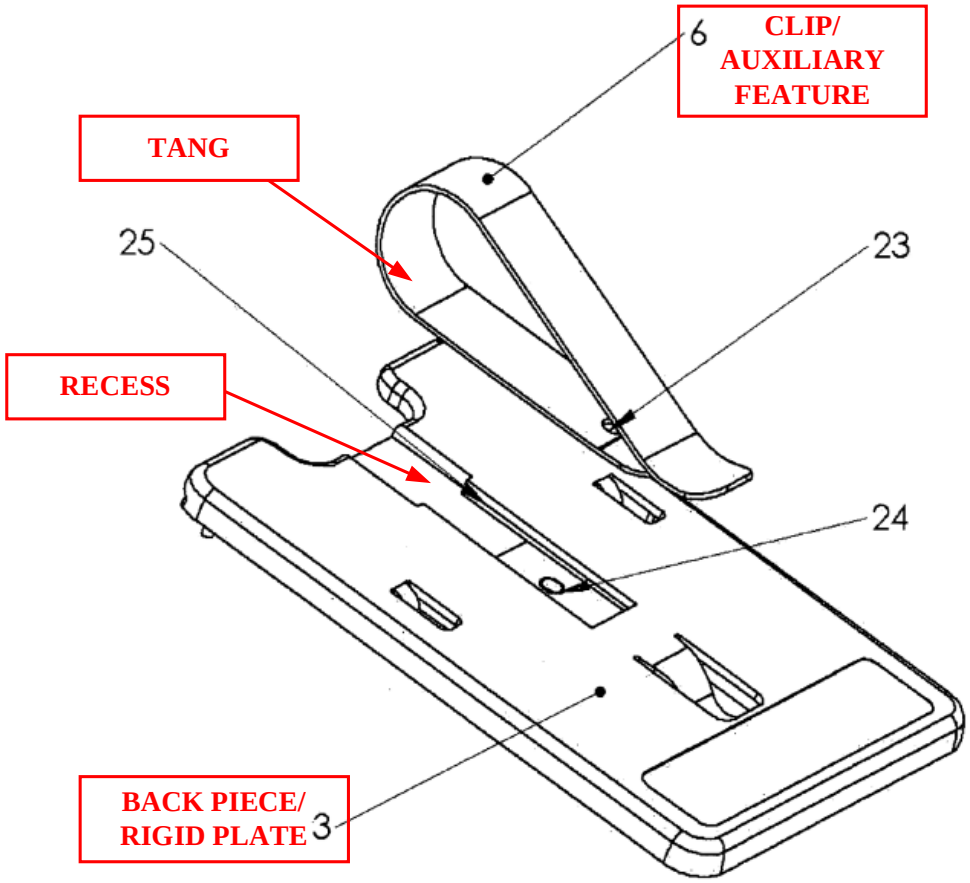
890. Accordingly, the Kane-Matthews combination discloses this limitation of Claim 14.

f. "the recess operable to receive a tang of an auxiliary feature,"

891. In my opinion, the Kane-Matthews combination discloses this limitation.

892. As discussed above in Section IX.C.1.f, with respect to limitation "f" of Claim 1, Matthews discloses that the recess receives a tang of a clip **6**. (Ex. 1006 at 6-7; Ex. 1009 at ¶¶ [0033], [0041], FIGS. 1-5.) For example:

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(*Id*. at FIG. 4 (*annotated*).)

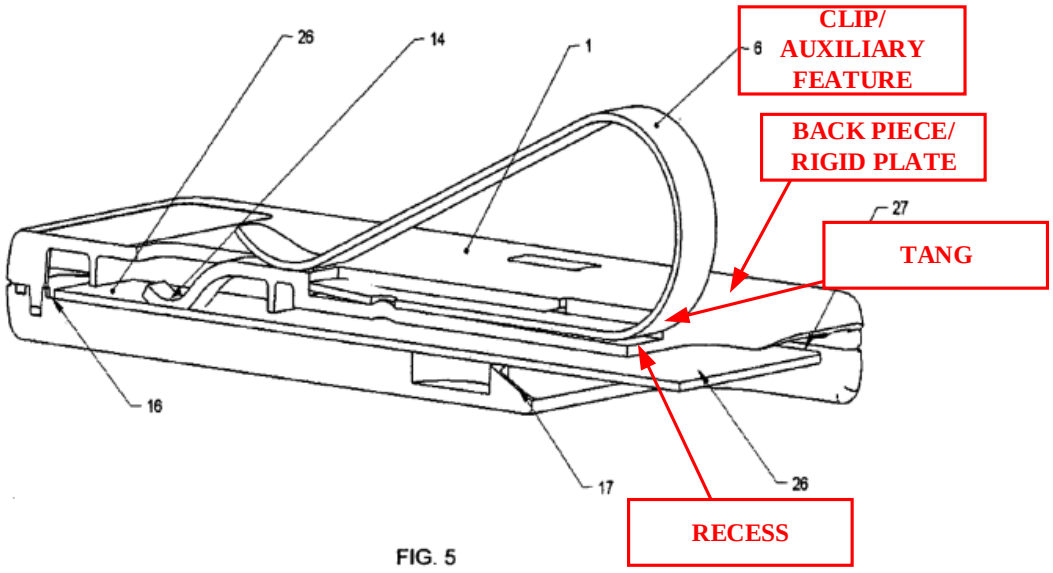


FIG. 5

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(*Id*. at FIG. 5 (*annotated*).)

893. As discussed above in Section IX.C.1.e, with respect to limitation "e" of Claim 1, a POSITA, reading Matthews, would have understood the clip **6** to constitute the claimed "auxiliary feature."

894. The discussions of Claim 1 presented in Section IX.C.1.e and Section IX.C.1.f are incorporated herein by reference.

895. As discussed above in Section IX.C.13.e, a POSITA would have been motivated to form a recess, like that disclosed by Matthews, in one or more interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane. The discussion of Claim 14 presented in Section IX.C.13.e is incorporated herein by reference. In doing so, such a POSITA would be motivated to render the recess operable to receive the tang of a clip ("auxiliary feature"), like that disclosed by Matthews, to render the clip removably attachable to the interior plate-outer faceplate pair ("rigid plate") and thereby facilitate user preferences/personalization, adapted use of the wallet, and/or maintenance/repair operations described herein. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences;" Ex. 1009 at ¶ [0041]: "This design allows for secure retention of the clip but also for user assisted removal if desired. If removed, the holder may be mounted in still

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further possible locations by the use of adhesives, tape, hook and loop fasteners, magnets or an y other method of mounting which may be desired," Abstract: "The clip is removable so that another means of attachment… may be used to attach the case to any desired location.")

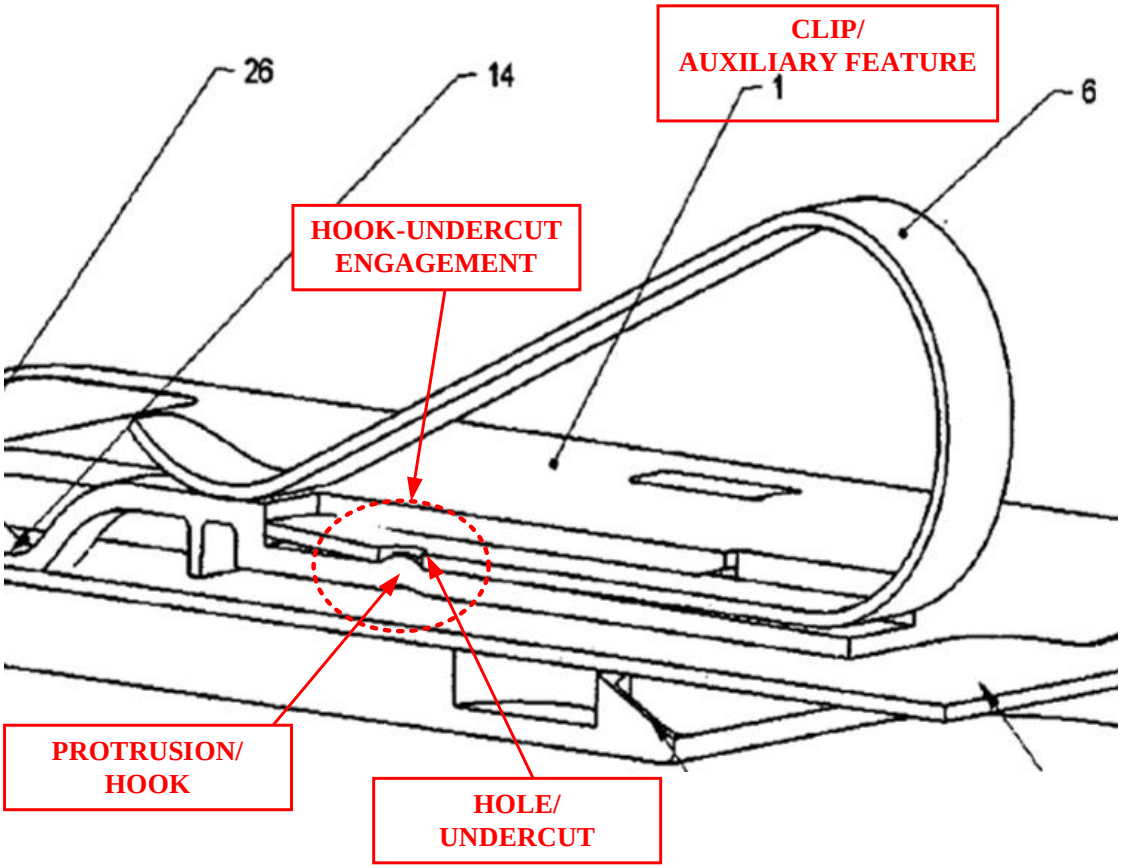
896. Accordingly, the Kane-Matthews combination discloses this limitation of Claim 14.

g. "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,"

897. In my opinion, the Kane-Matthews combination discloses this limitation.

898. As discussed above in Section IX.C.1.g and Section IX.C.1.i, with respect to limitations "g" and "i" of Claim 1, Matthews discloses "the clip is removable, as it is retained by a small post on the back case part and a corresponding hole in the clip. The combination provides sufficient retention, force to retain the clip against common loads during normal use, but can be overcome by a prying or transverse force (although one which may be applied with a person's hands) to allow the clip to be removed." (Ex. 1009 at ¶ [0041], FIGS. 1-5.) For example:

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(*Id*. at FIG. 5 (*magnified, annotated*).)

899. A POSITA, reading Matthews, would have understood the protrusion **24** to constitute the claimed "hook," and the hole **23** to constitute the claimed "undercut." Further, a POSITA would have understood a rearrangement of the protrusion **24** ("hook") to extend from the tang of the clip **6** ("auxiliary feature") and of the corresponding hole **23** ("undercut") to be located in the recess in the back piece **3** to be an obvious design choice to achieve the same functionality with predictable results. (*Id*. at ¶ [0038]: "it is recognized that departures can be made therefrom within the scope of the invention….")

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900. The discussions of Claim 1 presented in Section IX.C.1.g and Section IX.C.1.i are incorporated herein by reference.

901. In my opinion, a POSITA would have looked to Matthews for guidance on how to removably attach a clip ("auxiliary feature") to a compact wallet, like that disclosed by Kane, via engagement between a protrusion ("hook") and a hole ("undercut") in a recess, like that disclosed by Matthews, because Matthews and Kane are in the same technical field (*e.g.*, compact card holders), address similar problems, utilize similar devices, and disclose structural features that, when combined, function in the same manner as each does separately to yield predictable results, as set forth in Section IX.C.1.e; which is incorporated here by reference. (Ex. 1006 at 2-3, 5, 7-8, 10-11, 15-16, and photographs thereof; Ex. 1009 at Ex. 1009 at ¶¶ [0006], [0019], [0029], [0033], [0041], Claims 2 and 5-6, Abstract, FIGS. 1-5.)

902. Thus, a POSITA would be using a known technique to improve similar devices in the same way. The technique of configuring compact card holders with an attached clip ("auxiliary feature") that is removable via an engagement of a protrusion ("hook") with a hole ("undercut") in a recess was within the realm of ordinary capabilities of a POSITA based upon the teachings of at least Matthews. (Ex. 1009 at ¶¶ [0029], [0033], [0041], Claims 2 and 5-6, Abstract, FIGS. 1-5.) Further, a POSITA would have been capable of applying this known method of configuring the compact wallet of Kane to yield predictable results.

903. Having reviewed Matthews, such a POSITA would have been motivated to removably attach a clip ("auxiliary feature") to a wallet's interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, via an engagement between a protrusion ("hook") and a hole ("undercut") in a recess, like that disclosed by Matthews, to provide a compact wallet that allows a consumer to remove the clip ("auxiliary feature") when not needed, in accordance with the minimalist preferences inherent to the compact wallet marketplace. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 7: photographs thereof, 9-10: "without money clip… with traditional money clip… with spring-loaded money clip," and photographs thereof, 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences;" Ex. 1009 at ¶ [0041]: "This design allows for secure retention of the clip but also for user assisted removal if desired. If removed, the holder may be mounted in still further possible locations by the use of adhesives, tape, hook and loop fasteners, magnets or an y other method of mounting which may be desired," Abstract: "The clip is removable so that another means of attachment… may be used to attach the case to any desired location.")

904. Moreover, a POSITA would have had good reason to incorporate the teachings of Matthews into Kane, as discussed above, with a reasonable expectation of success to advance the maintenance operations promoted by Kane. For example,

Kane discloses turning a wallet "into a 'system' that can be completely disassembled by the user to replace the elastic and exchange outer plates for greater personalization." (Ex. 1006 at 3.) Rendering the clip ("auxiliary feature") removable via an engagement between a protrusion ("hook") and a hole ("undercut") in a recess, as disclosed by Matthews, advances the disassembly and personalization of the wallets, as suggested by Kane. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences.")

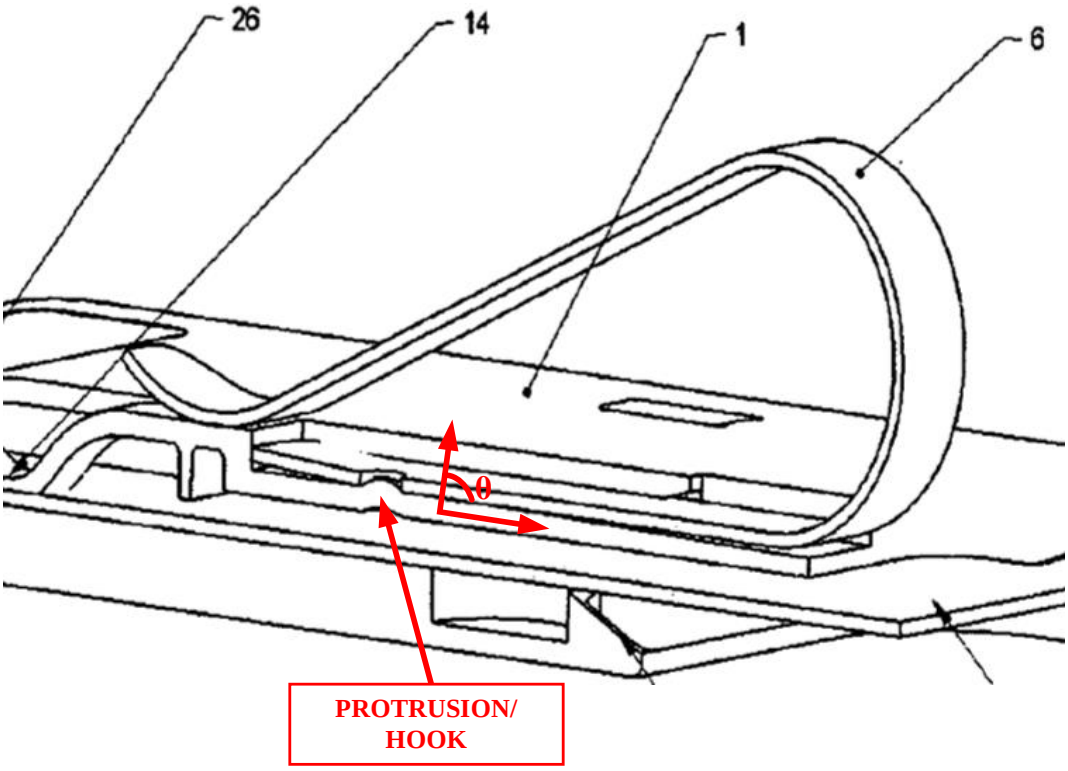
905. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 14.

h. "the hook extending at an angle to the tang,"

906. In my opinion, the Kane-Matthews combination discloses this limitation.

907. As discussed above in Section IX.C.1.h, with respect to limitation "h" of Claim 1, Matthews discloses the protrusion **24** ("hook") extending at an angle to the back piece **3**. (Ex. 1009 at FIG. 5). Provided below is magnified portion of FIG. 5, annotated in red to delineate the angle at which the protrusion **24** ("hook") extends therefrom (θ).

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(*Id*. at FIG. 5 (*magnified, annotated*).)

908. As discussed above in Section IX.C.1.g, a POSITA would have understood a rearrangement of the protrusion **24** ("hook") onto the tang of the clip **6** ("auxiliary feature") to be an obvious design choice to achieve the same functionality with predictable results. (*Id*. at ¶ [0038]: "it is recognized that departures can be made therefrom within the scope of the invention…") In doing so, in my opinion, the protrusion **24** ("hook") would extend at an angle from the tang of the clip **6** ("auxiliary feature") in the same manner as Matthew illustrates the protrusion **24** ("hook") extending at angle from the back piece **3**.

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909. The discussions of Claim 1 presented in Section IX.C.1.g and Section IX.C.1.h are incorporated herein by reference.

910. Further, a POSITA would have been motivated to configure a compact wallet, like that disclosed by Kane, with a clip having a tang with a hook extending at an angle therefrom, like that disclosed by Matthews, to achieve a removable clip because Kane and Matthews are in the same technical field (*e.g.*, compact card holders), address similar problems, utilize similar devices, and disclose methods that when combined function in the same manner as each does separately to yield predictable results, as set forth in Section IX.C.1.e; which is incorporated here by reference. (Ex. 1006 at 2-3, 5, 7-8, 10-11, 15-16, and photographs thereof; Ex. 1009 at ¶¶ [0006], [0019], [0029], [0033], [0041], Claims 2 and 5-6, Abstract, FIGS. 1-5.) In doing so, the POSITA would apply a known technique to a known device ready for improvement to yield predictable results.

911. Such a POSITA would have been motivated to configure a compact wallet, like that disclosed by Kane, with a clip having a tang with a hook extending at an angle therefrom, like that disclosed by Matthews, to enable a consumer to remove the clip when not needed, in accordance with the minimalist preferences inherent to the compact wallet marketplace. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 7: photographs thereof, 9-10: "without money clip… with traditional money clip… with spring-loaded

money clip," and photographs thereof, 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences.")

912. Moreover, a POSITA would have had good reason to incorporate the teachings of Matthews into Kane, as discussed above, with a reasonable expectation of success to advance the maintenance operations promoted by Kane. For example, Kane discloses turning a wallet "into a 'system' that can be completely disassembled by the user to replace the elastic and exchange outer plates for greater personalization." (Ex. 1006 at 3.) Utilizing a hook extending at an angle to the tang of the clip, as disclosed by Matthews, facilitates removable attachment of the clip and advances the disassembly and personalization of the wallets, as suggested by Kane. (Ex. 1006 at 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences;" Ex. 1009 at ¶ [0041]: "This design allows for secure retention of the clip but also for user assisted removal if desired. If removed, the holder may be mounted in still further possible locations by the use of adhesives, tape, hook and loop fasteners, magnets or an y other method of mounting which may be desired," Abstract: "The clip is removable so that another means of attachment… may be used to attach the case to any desired location.")

913. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 14.

i. "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."

914. In my opinion, Kane discloses this limitation.

915. I explained earlier in Section IX.A.1.j (with respect to limitation "j" of Claim 1) and Section IX.A.13.i that this limitation is disclosed by Kane. The discussion of Claim 1 presented in Section IX.A.1.j and Claim 14 presented in Section IX.A.13.i is incorporated herein by reference.

916. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 14.

14. Claim 15

a. "The compact wallet of claim 14, wherein the groove is in a first lamina of a laminate construction of each rigid plate,"

917. In my opinion, Kane discloses this limitation.

918. As set forth above, the Kane-Matthews combination discloses each and every limitation of claim 14, and said discussion is incorporated herein by reference.

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919. I explained earlier in Section IX.A.14.a that this limitation is disclosed by Kane. The discussion of Claim 15 presented in Section IX.A.14.a is incorporated herein by reference.

920. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 15.

b. "the groove slidingly receiving one part of the at least one encircling elastic band."

921. In my opinion, Kane discloses this limitation.

922. As set forth above, the Kane-Matthews combination discloses each and every limitation of Claim 14, and said discussion is incorporated herein by reference.

923. I explained earlier in Section IX.A.14.b that this limitation is disclosed by Kane. The discussion of Claim 15 presented in Section IX.A.14.b is incorporated herein by reference.

924. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 15.

15. Claim 16

a. "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."

925. In my opinion, Kane discloses this limitation.

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926. As set forth above, the Kane-Matthews combination discloses each and every limitation of Claim 15, and said discussion is incorporated herein by reference.

927. I explained earlier in Section IX.A.15.a that this limitation is disclosed by Kane. The discussion of Claim 16 presented in Section IX.A.15.a is incorporated herein by reference.

928. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 16.

16. Claim 17

a. "The compact wallet of claim 16, wherein the second lamina is attached to the first lamina by screws."

929. In my opinion, Kane discloses this limitation.

930. As set forth above, the Kane-Matthews combination discloses each and every limitation of Claim 16, and said discussion is incorporated herein by reference.

931. I explained earlier in Section IX.A.16.a that this limitation is disclosed by Kane. The discussion of Claim 17 presented in Section IX.A.16.a is incorporated herein by reference.

932. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 17.

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17. Claim 18

a. "The compact wallet of claim 1, wherein each rigid plate is comprised of metal for RFID protection."

933. In my opinion, Kane discloses this limitation.

934. As set forth above, the Kane-Matthews combination discloses each and every limitation of Claim 1, and said discussion is incorporated herein by reference.

935. I explained earlier in Section IX.A.17.a that this limitation is disclosed by Kane. The discussion of Claim 18 presented in Section IX.A.17.a is incorporated herein by reference.

936. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 18.

18. Claim 19

a. "A method of making a modular compact wallet, comprising the steps:"

937. Claim 19 recites a method for making, in my opinion, the compact wallet recited in Claim 1 and/or Claim 14.

938. Accordingly, the discussion of Claim 1 presented in Section IX.C.1 and the discussion of Claim 14 presented in Section IX.C.13 are incorporated herein by reference.

939. Both Kane and Matthews each disclose methods of making a modular compact wallet. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be

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completely disassembled by the user to replace the elastic and exchange outer plates for greater personalization… low profile to easily fit in your front pocket;" Ex. 1009 at ¶ [0017]: an "objective is to provide a holder with the functionality described above which is compact," ¶ [0019]: "according to these and other objectives, the invention generally provides a compact, convenient device designed primarily for the storage of a wallet-sized card….")

940. Accordingly, in my opinion, the Kane-Matthews combination discloses the preamble of Claim 19.

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

941. In my opinion, Kane discloses this limitation.

942. I explained earlier in Section IX.A.13.b (with respect to limitation "b" of Claim 14) and Section IX.A.18.b that this limitation is disclosed by Kane. For example, a POSITA, reading Kane, would have understood the two interior plate-outer faceplate pairs to constitute the claimed "at least two rigid plates," and the integrated elastic track to constitute the claimed "groove." The discussions of Claim 14 presented in Section IX.A.14.b and Claim 19 presented in Section IX.A.18.b are incorporated herein by reference.

943. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 19.

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c. "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,"

944. In my opinion, Kane discloses this limitation.

945. I explained earlier in Section IX.A.13.c (with respect to limitation "c" of Claim 14) and Section IX.A.18.c that this limitation is disclosed by Kane. The discussions of Claim 14 presented in Section IX.A.13.c and Claim 19 presented in Section IX.A.18.c are incorporated herein by reference.

946. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 19.

d. "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,"

947. In my opinion, Kane discloses this limitation.

948. I explained earlier in Section IX.A.13.d (with respect to limitation "d" of Claim 14) and Section IX.A.18.d that this limitation is disclosed by Kane. The discussions of Claim 14 presented in Section IX.A.13.d and Claim 19 presented in Section IX.A.18.d are incorporated herein by reference.

949. Accordingly, in my opinion, The Kane-Matthews combination discloses this limitation of Claim 19.

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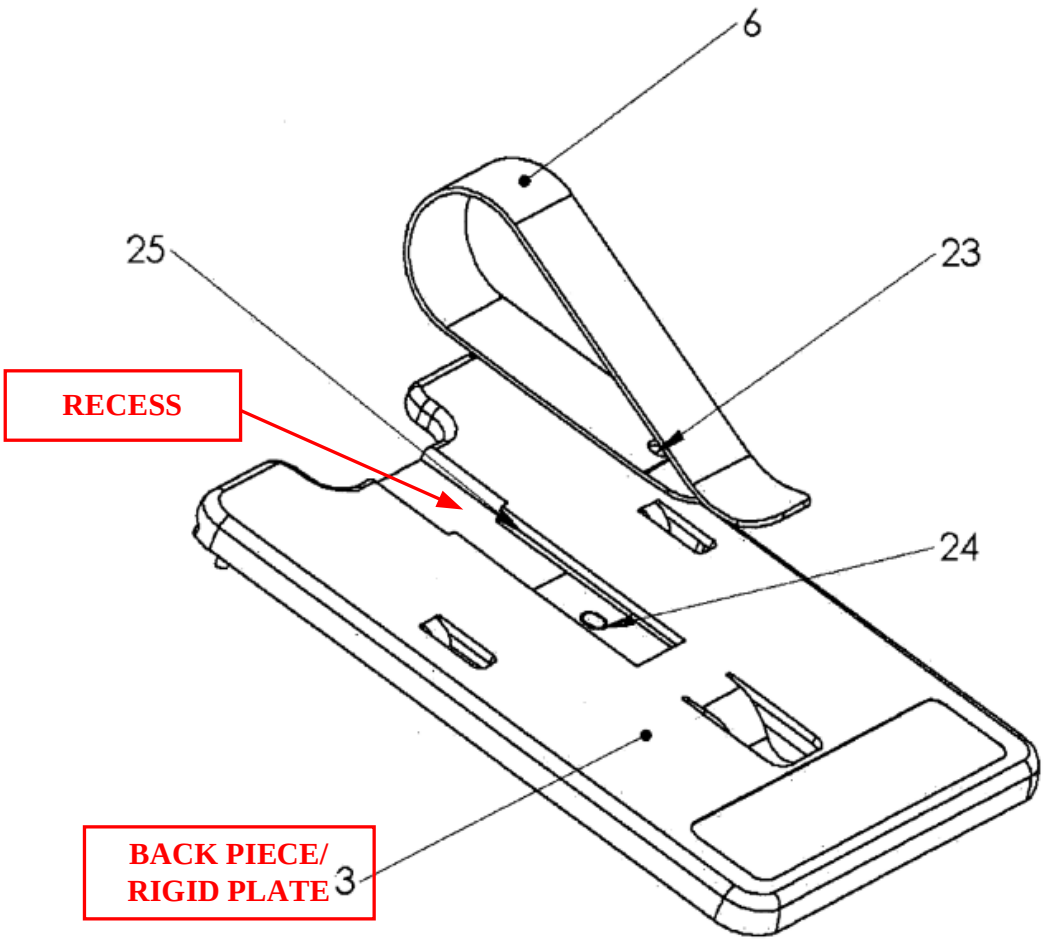
e. "at least one groove additionally having at least one recess positioned outbound of the elastic band;"

950. In my opinion, the Kane-Matthews combination discloses this limitation.

951. Claim 19 does not provide antecedent basis for recitation of "at least one groove;" however, in my opinion, a POSITA would have understood the "at least one groove" to be at least one groove of the grooves of the rigid plates.

952. As discussed above in Section IX.C.1.f and Section IX.C.13.e, with respect to limitation "f" of Claim 1 and limitation "e" of Claim 14, Matthews discloses a recess located in the back piece **3**. (Ex. 1009 at ¶ [0033], FIGS. 1-5.) For example:

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(*Id*. at FIG. 4 (*annotated*).)

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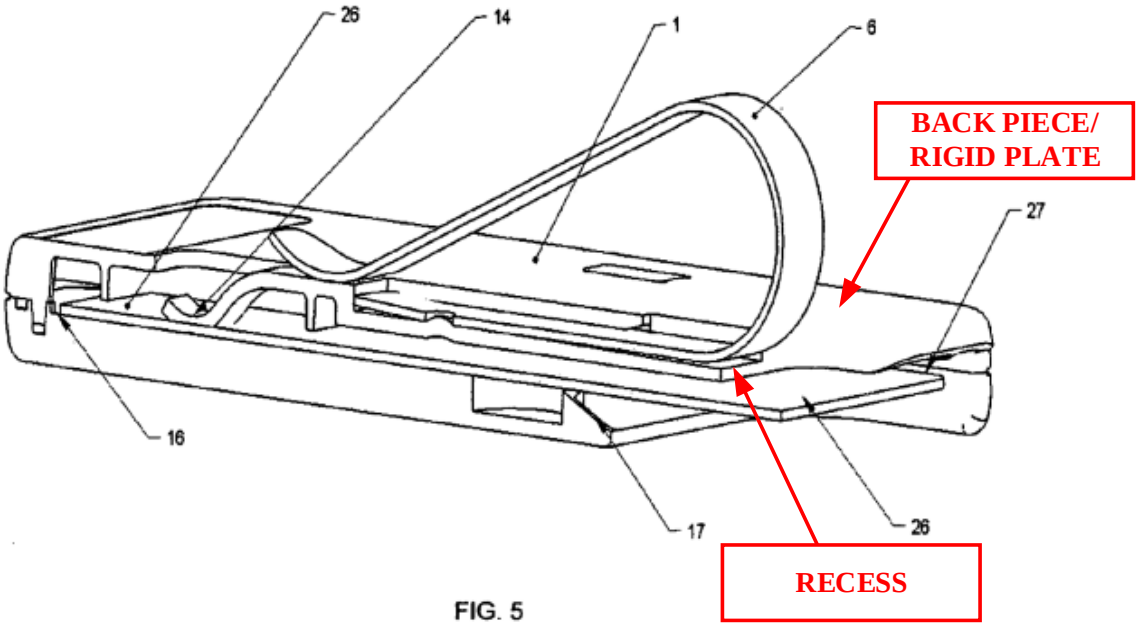


FIG. 5

(*Id*. at FIG. 5 (*annotated*).)

953. The discussion of Claim 1 presented in Section IX.C.1.f is incorporated herein by reference. Likewise, the discussion of Claim 14 presented in Section IX.C.13.e is incorporated herein by reference.

954. A POSITA would have been motivated to form a recess, like that disclosed by Matthews, in an interior plate-outer faceplate pair ("rigid plates"), like that disclosed by Kane, to effectuate a removably attachable clip and facilitate user preferences/personalization, adapted uses, and/or maintenance/repair operations. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange the outer plates for greater personalization," 6: "The Ridge 2.0 is available with two different types of money

clips or without a clip," 9-10: photographs thereof, 15-16: "Our biggest challenge is… creating a product that is versatile enough to suit a wide range of people and preferences;" Ex. 1009 at ¶ [0041]: "This design allows for secure retention of the clip but also for user assisted removal if desired. If removed, the holder may be mounted in still further possible locations by the use of adhesives, tape, hook and loop fasteners, magnets or an y other method of mounting which may be desired," Abstract: "The clip is removable so that another means of attachment… may be used to attach the case to any desired location.")

955. Moreover, a POSITA would have been motivated to form the recess, like that disclosed by Matthews, in one or more the interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, outbound the encircling elastic band ("elastic band," understood to reference the "at least one encircling elastic band") to avoid interference between the function of the recess (*e.g.*, to capture an auxiliary feature) and the function of the elastic band (*e.g.*, to expand and contract while enabling the wallet to have elastic volume).

956. In addition, A POSITA would have been motivated to form the recess, like that disclosed by Matthews, in one or more the interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, outbound the elastic band at least because said positioning is one of a finite number of identified, predictable positions, with a reasonable expectation of success. For example, there are a finite number of

locations in the interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, where a recess, like that disclosed by Matthews, could be positioned. In my opinion, a POSITA would have reasonably predicted that positioning a recess, like that disclosed by Matthews, outbound the encircling elastic band, like that disclosed by Kane, would result in successful operation of both the insertion opening ("recess") and the elastic band.

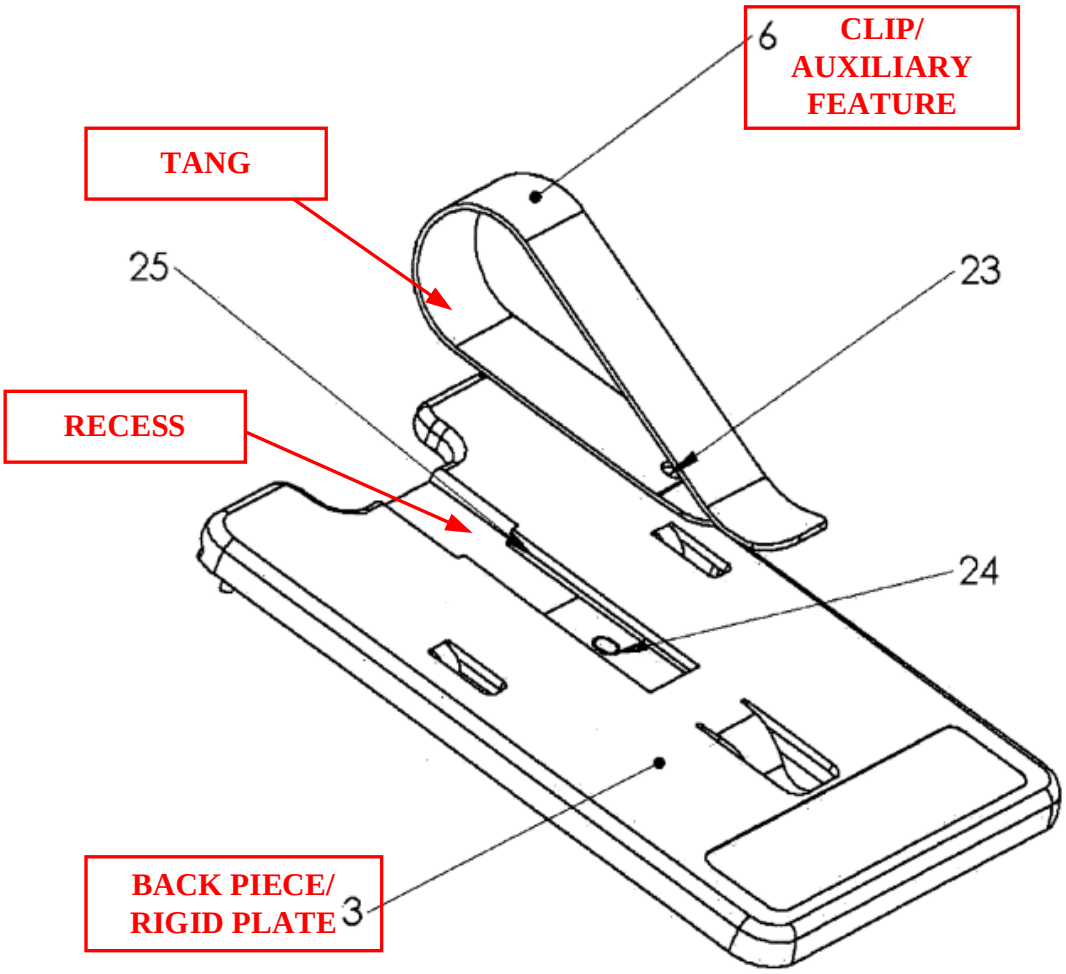
957. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 19.

f. "providing a first auxiliary feature having at least one tang;

958. In my opinion, both Kane and Matthews each disclose this limitation.

959. As discussed above in Section IX.C.1.f (with respect to limitation "f" of Claim 1) and Section IX.C.13.f (with respect to limitation "f" of Claim 1), Matthews discloses a clip **6** ("auxiliary feature") having a tang. (Ex. 1009 at ¶¶ [0029], [0033], [0041], FIGS. 1-5.) For example:

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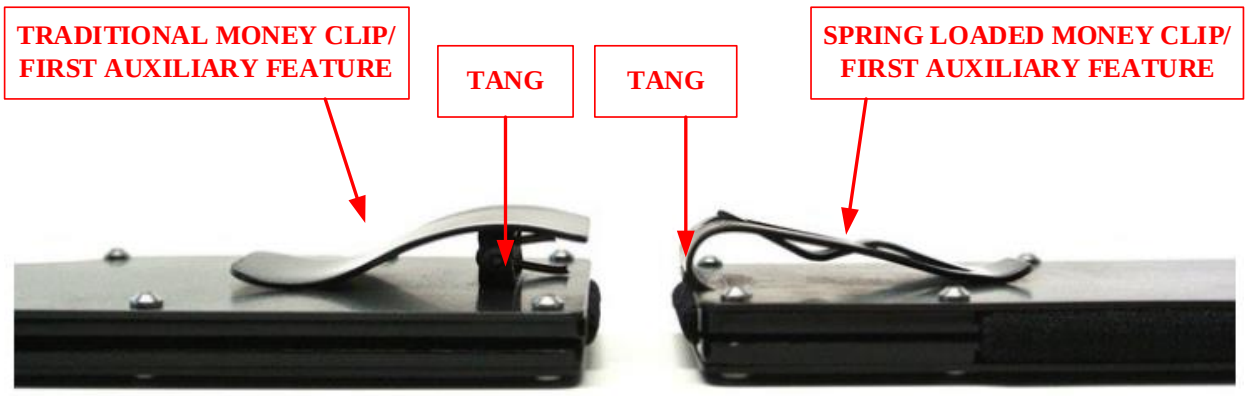
(*Id*. at FIG. 4 (*annotated*).)

960. A POSITA, reading Matthews, would have understood the clip **6** to constitute the claimed "first auxiliary feature." Further, having reviewed Matthews, a POSITA, in my opinion, would have understood that Matthews discloses "providing" the clip **6** ("auxiliary feature") to assemble the card holder case. (*Id*.)

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961. The discussion of Claim 1 presented in Section IX.C.1.f is incorporated herein by reference. Likewise, the discussion of Claim 14 presented in Section IX.C.13.f is incorporated herein by reference.

962. In my opinion, Kane also discloses this limitation. Kane discloses a money clip ("auxiliary feature") having at least one tang. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip.") A POSITA, reading Kane, would have understood the money clip to constitute the claimed "first auxiliary feature." For example, Kane discloses the following photograph depicting the money clip ("first auxiliary feature") and the tang thereof.



(*Id*. (*annotated*))

963. Having reviewed Kane, a POSITA, in my opinion, would have understood that Kane discloses "providing" the money clip ("first auxiliary feature") to assemble the wallet.

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964. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 19.

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

965. In my opinion, the Kane-Matthews combination discloses this limitation.

966. As discussed above in Section IX.C.1.f (with respect to limitation "f" of Claim 1) and Section IX.C.13.f, with respect to limitation "f" of Claim 14), Matthews discloses inserting the tang of the clip **6** ("auxiliary feature") into the recess; thereby making the clip **6** ("auxiliary feature") available at an outside face of the card holder. (Ex. 1009 at ¶¶ [0029], [0033], [0041], Claims 2 and 5-6, Abstract: "the clip is removable," FIGS. 1-5.) For example:

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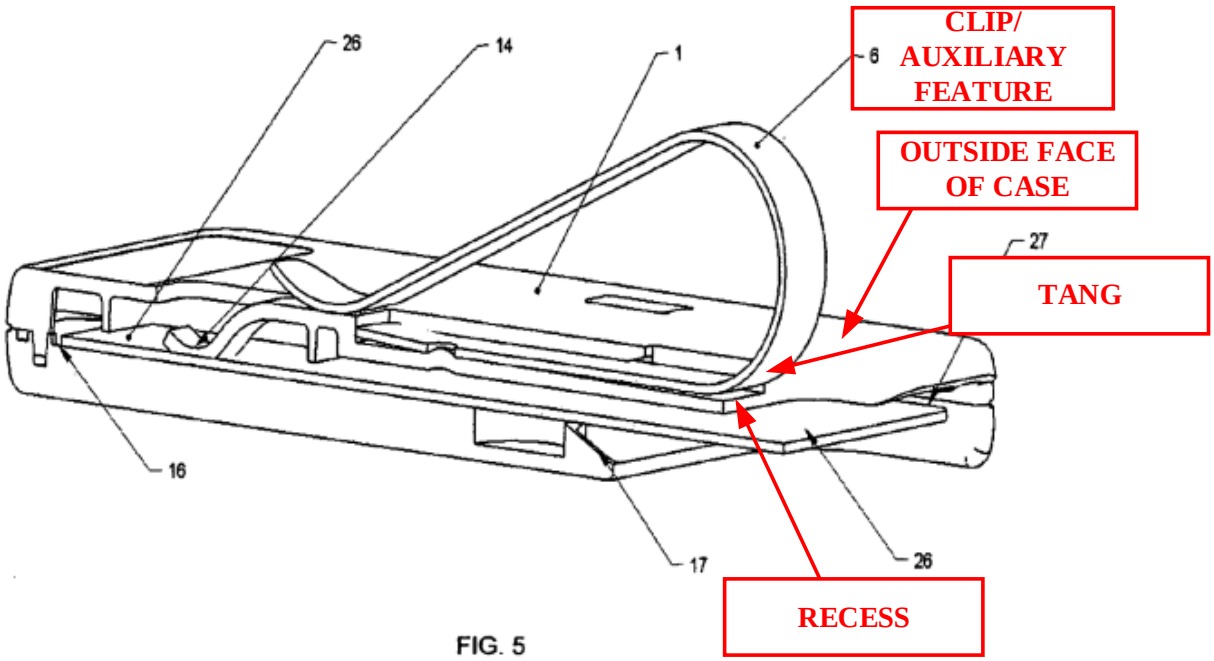


FIG. 5

(*Id*. at FIG. 5 (*annotated*).)

967. The discussion of Claim 1 presented in Section IX.C.1.f is incorporated herein by references. Likewise, the discussion of Claim 14 presented in Section IX.C.13.f is incorporated herein by reference.

968. Further, a POSITA would have been motivated to insert, removably, the tang of an initial clip ("first auxiliary feature") into a recess, like that disclosed by Matthews, formed inside an interior plate-outer faceplate ("rigid plate") of a wallet, like that disclosed by Kane, to effectuate a removable clip that advances the personalization, adapted use, and/or maintenance operations described herein. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange the outer plates for greater

personalization," 6: "The Ridge 2.0 is available with two different types of money clips or without a clip," 9-10: photographs thereof, 15-16: "Our biggest challenge is… creating a product that is versatile enough to suit a wide range of people and preferences; Ex. 1009 at ¶ [0041]: "This design allows for secure retention of the clip but also for user assisted removal if desired. If removed, the holder may be mounted in still further possible locations by the use of adhesives, tape, hook and loop fasteners, magnets or an y other method of mounting which may be desired," Abstract: "The clip is removable so that another means of attachment… may be used to attach the case to any desired location.")

969. In doing so, such a POSITA would make the initial clip ("first auxiliary feature") available to the outside face of the interior plate-outer faceplate pair ("rigid plate") in accordance with the common operation of a clip (*e.g.*, as evidenced by Kane and Matthews both disclosing clips made available to the outside of the respective wallets). (Ex. 1006 at 6-7; Ex. 1009 at ¶¶ [0029], [0033], [0041], Claims 2 and 5-6, Abstract, FIGS. 1-5.)

970. In attaching a clip ("first auxiliary feature") to one or more of the interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, by inserting a tang of the initial clip ("first auxiliary feature") into a recess, like that disclosed by Matthews, a POSITA would be using a known technique to improve similar devices in the same way. The technique of configuring compact card holders

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by removably inserting a tang of a clip ("auxiliary feature") into a ("recess") of the card holder was within the realm of ordinary capabilities of a POSITA based upon the teachings of at least Matthews. (Ex. 1009 at ¶¶ [0006], [0019], [0029], [0033], [0041], Claims 2 and 5-6, Abstract, FIGS. 1-5.) Further, a POSITA would have been capable of applying this known method of enhancement to the compact wallet of Kane to yield predictable results.

971. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 19.

h. "removing, selectively, the first auxiliary feature;"

972. In my opinion, the Kane-Matthews combination discloses this limitation.

973. Matthews discloses "[t]his design allows for secure retention of the clip but also for user assisted removal if desired." (Ex. 1009 at ¶ [0041], FIGS. 1-5.). Further, Matthews discloses, "[t]he clip is removable so that another means of attachment… may be used to attach to the case to any desired location." (*Id*. at Abstract.).

974. In my opinion, a POSITA, reading Matthews, also would have been motivated to selectively remove the initial clip ("first auxiliary feature"), like that disclosed by Matthews, from the wallet to replace the initial clip ("first auxiliary feature") with another. For instance, a POSITA would have understood that a

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primary feature of rendering a clip **6** ("auxiliary feature") removable is the ability to swap the clip **6** ("auxiliary feature") for another if, for example, the clip **6** ("auxiliary feature") is damaged or a new clip **6** ("auxiliary feature") is desired.

975. Moreover, a POSITA, reading Kane, would have been motivated to selectively remove a removable initial clip ("first auxiliary feature"), like that disclosed by Matthews, to advance the wallet personalization promoted by Kane and/or to remove the clip when not needed in accordance with the minimalist philosophy in the field of art. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange the outer plates for greater personalization," 6: "The Ridge 2.0 is available with two different types of money clips or without a clip," 9-10: photographs thereof, 15-16: "Our biggest challenge is… creating a product that is versatile enough to suit a wide range of people and preferences.")

976. For example, Kane discloses wallets with and without money clips; thereby, demonstrating an apparent demand for various configurations to meet consumer preferences and/or uses. A POSITA would have been motivated to alter the configuration of a compact wallet by removing a removably attached initial clip ("first auxiliary feature") to make a wallet that meets one or more user preferences.

977. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 19.

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

978. In my opinion, both Kane and Matthews each disclose this limitation.

979. As discussed above in Section IX.C.18.f, both Kane and Matthews each disclose providing a clip ("auxiliary feature") having at least one tang. (Ex. 1006 at 6-7 and 10-15; (Ex. 1009 at ¶¶ [0029], [0033], [0041], Abstract, FIGS. 1-5.) The discussion presented in Section IX.C.18.f is incorporated herein by reference.

980. Further, as discussed above in Section IX.C.18.h, a POSITA, reading Kane and/or Matthews, would have been motivated to replace an initial clip ("first auxiliary feature") with a substitute clip ("second auxiliary feature") to personalize the wallet, adapt the wallet to a given use preference, and/or perform a maintenance/repair operation described herein. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange the outer plates for greater personalization," 6: "The Ridge 2.0 is available with two different types of money clips or without a clip," 9-10: photographs thereof, 15-16: "Our biggest challenge is… creating a product that is versatile enough to suit a wide range of people and preferences; Ex. 1009 at ¶ [0041]: "This design allows for secure retention of the clip but also for user assisted removal if desired," Abstract: "The clip is removable so that another means of attachment… may be used to attach the case to any desired location.")

981. In doing so, such a POSITA would be exercising the functionality inherent to a removably attached clip to promote one or more objectives suggested by Kane and/or Matthews. Further, the substitute clip ("second auxiliary feature") would be a mere duplication of the initial clip ("first auxiliary feature") without any new or unexpected results.

982. Thus, a POSITA would have understood a substitute clip, like the clip disclosed by Kane or the clip **6** disclosed by Matthews, to constitute the claimed "second auxiliary feature."

983. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 19.

j. "inserting, removably, the at least one tang of the second auxiliary feature into the at least one recess to make the second auxiliary feature available at an outside face of at least one of the two rigid plates,"

984. In my opinion, the Kane-Matthews combination discloses this limitation.

985. As discussed above in Section IX.C.18.g, Matthews discloses inserting, removably, the tang of a clip **6** ("auxiliary feature") into a recess to make the clip **6** ("auxiliary feature") available at an outside face of the card holder case. (Ex. 1009 at ¶¶ [0029], [0033], [0041], Claims 2 and 5-6, Abstract, FIGS. 1-5.)

986. Further, a POSITA would have been motivated to insert, removably, the tang of a clip ("auxiliary feature") into a recess, like that disclosed by Matthews, formed inside an interior plate-outer faceplate pair ("rigid plate") of a wallet, like that disclosed by Kane, to effectuate a removable clip that advances the personalization, adapted use, and/or maintenance operations described herein. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange the outer plates for greater personalization," 6: "The Ridge 2.0 is available with two different types of money clips or without a clip," 9-10: photographs thereof, 15-16: "Our biggest challenge is… creating a product that is versatile enough to suit a wide range of people and preferences; Ex. 1009 at ¶ [0041]: "This design allows for secure retention of the clip but also for user assisted removal if desired," Abstract: "The clip is removable so that another means of attachment… may be used to attach the case to any desired location.")

987. In doing so, such a POSITA would make the substitute clip ("second auxiliary feature") available to the outside face of the interior plate-outer faceplate pair ("rigid plate") in accordance with the common operation of a clip (*e.g.*, as evidenced by Kane and Matthews both disclosing clips made available to the outside of the respective wallets). (Ex. 1006 at 6-7; Ex. 1009 at FIGS. 1-5.)

988. Further, as discussed above in Section IX.C.18.h, a POSITA, reading Kane and/or Matthews, would have been motivated to replace an initial clip ("first auxiliary feature") with a substitute clip ("second auxiliary feature") to personalize the wallet, adapt the wallet to a given use preference, and/or perform a maintenance/repair operation. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange the outer plates for greater personalization," 6: "The Ridge 2.0 is available with two different types of money clips or without a clip," 9-10: photographs thereof, 15-16: "Our biggest challenge is… creating a product that is versatile enough to suit a wide range of people and preferences; Ex. 1009 at ¶ [0041]: "This design allows for secure retention of the clip but also for user assisted removal if desired," Abstract: "The clip is removable so that another means of attachment… may be used to attach the case to any desired location.")

989. In doing so, such a POSITA would be exercising the functionality inherent to a removably attached clip to promote one or more objectives suggested by Kane. Further, insertion of the substitute clip ("second auxiliary feature") would be a mere duplication of the previous insertion step of the initial clip ("first auxiliary feature") without any new or unexpected results.

990. The discussions presented in Section IX.C.18.g and Section IX.C.18.h are incorporated herein by reference.

991. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of claim 19.

k. "the at least one recess having an undercut operable to engage a hook of the tang to prevent inadvertent dislodgement of the second auxiliary feature from the at least one recess,"

992. In my opinion, the Kane-Matthews combination discloses this limitation.

993. Limitation "k" of Claim 19 does not delineate whether the "tang" is the tang of the first auxiliary feature or the tang of the second auxiliary feature. In my opinion, a POSITA would have understood the "tang" recited in limitation "k" of Claim 19 to be the tang of the second auxiliary feature given that said tang is claimed to prevent inadvertent dislodgement of the second auxiliary feature.

994. As discussed above in Section IX.C.1.i (with respect to limitation "i" of Claim 1) and Section IX.C.13.g (with respect to limitation "g" of Claim 14), Matthews discloses "the clip is removable, as it is retained by a small post on the back case part and a corresponding hole in the clip. This combination provides sufficient retention force to retain the clip against common loads during normal use, but can be overcome by a prying or transverse force (although one which may be applied with a person's hand) to allow the clip to be removed." (Ex. 1009 at ¶ [0041].) As such, Matthew teaches an engagement between a protrusion **24** (aka

"small post") and a corresponding hole **23** to prevent inadvertent dislodgement of the clip **6** from the recess. (*Id*. at ¶¶ [0029], [0033], [0041], Claims 2 and 5-6, Abstract, FIGS. 1-5.) For example:

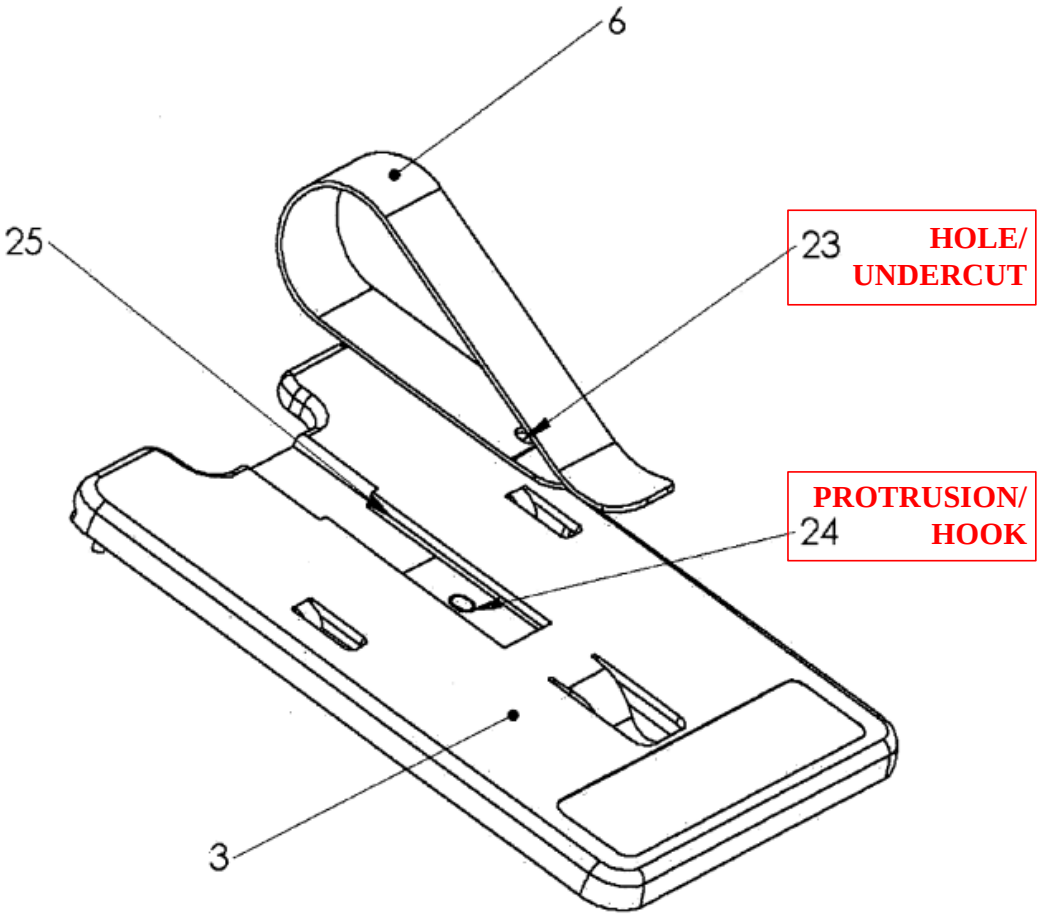
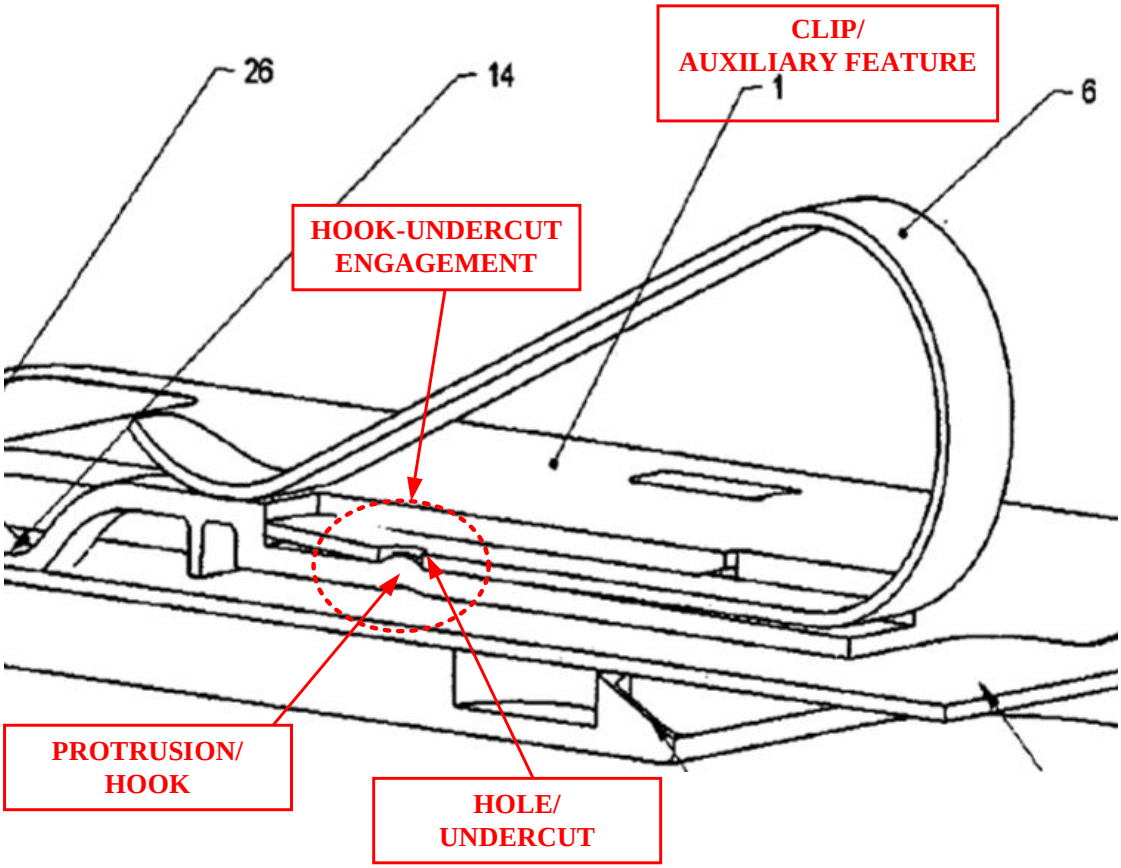


FIG. 4

(*Id*. at FIG. 4 (*annotated*).)

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(*Id*. at FIG. 5 (*magnified, annotated*).)

995. As discussed above in Section IX.C.1.g (with respect to limitation "g" of Claim 1) and Section IX.C.13.g (with respect to limitation "g" to Claim 14), a POSITA, reading Matthews, would have understood the protrusion **24** to constitute the claimed "hook," and the hole **23** to constitute the claimed "undercut." Further, a POSITA would have understood a rearrangement of the protrusion **24** ("hook") to extend from the tang of the clip **6** ("auxiliary feature") and of the corresponding hole **23** ("undercut") to be located in the recess in the back piece **3** to be an obvious design choice to achieve the same functionality with predictable results. (*Id*. at ¶

[0038]: "it is recognized that departures can be made therefrom within the scope of the invention….")

996. The discussion of Claim 1 presented in Section IX.C.1.g is incorporated herein by reference. Likewise, the discussion of Claim 14 presented in Section IX.C.13.g is incorporated herein by reference.

997. Also discussed above in Section IX.C.13.g, with respect to limitation "g" of Claim 14, a POSITA would have looked to Matthews for guidance on how to removably attach a clip, such as a substitute clip ("second auxiliary feature"), to a compact wallet, like that disclosed by Kane, via engagement of a protrusion ("hook") with a hole ("undercut") of a recess, like that disclosed by Matthews, because Matthews and Kane are in the same technical field (*e.g.*, compact card holders), address similar problems, utilize similar devices, and disclose structural features that, when combined, function in the same manner as each does separately to yield predictable results, as set forth in Section IX.C.1.e; which is incorporated here by reference. (Ex. 1006 at 2-3, 5, 7-8, 10-11, 15-16, and photographs thereof; Ex. 1009 at ¶¶ [0006], [0019], [0029], [0033], [0041], Claims 2 and 5-6, Abstract, FIGS. 1-5.) In doing so, a POSITA would be using a known technique to improve similar devices in the same way.

998. Having reviewed Matthews, such a POSITA would have been motivated to removably attach the clip, such as a substitute clip ("second auxiliary

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feature"), via engagement of a protrusion ("hook") with a hole ("undercut") of a recess, like that disclosed by Matthews, to an interior plate-outer faceplate ("rigid plate"), like that disclosed by Kane, to provide a compact wallet that allows a consumer to remove the substitute clip ("second auxiliary feature") when not needed, in accordance with the minimalist preferences inherent to the compact wallet marketplace. (Ex. 1006 at 6: "The Ridge 2 is available with two different types of money clips or without a clip," 7: photographs thereof, 9-10: "without money clip… with traditional money clip… with spring-loaded money clip," and photographs thereof, 15-16: "Our biggest challenge is conveying our idea and creating a product that is versatile enough to suit a wide range of people and preferences; Ex. 1009 at ¶ [0041]: "This design allows for secure retention of the clip but also for user assisted removal if desired," Abstract: "The clip is removable so that another means of attachment… may be used to attach the case to any desired location.")

999. Moreover, a POSITA would have had good reason to incorporate the teachings of Matthews into Kane, as discussed above, with a reasonable expectation of success to advance the maintenance operations promoted by Kane. (Ex. 1006 at 3: "turn the wallet into a 'system' that can be completely disassembled by the user to replace the elastic and exchange the outer plates for greater personalization.")

1000. The discussion of Claim 14 presented in Section IX.C.13.g is incorporated herein by reference.

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1001. Accordingly, in my opinion, The Kane-Matthews combination discloses this limitation of Claim 19.

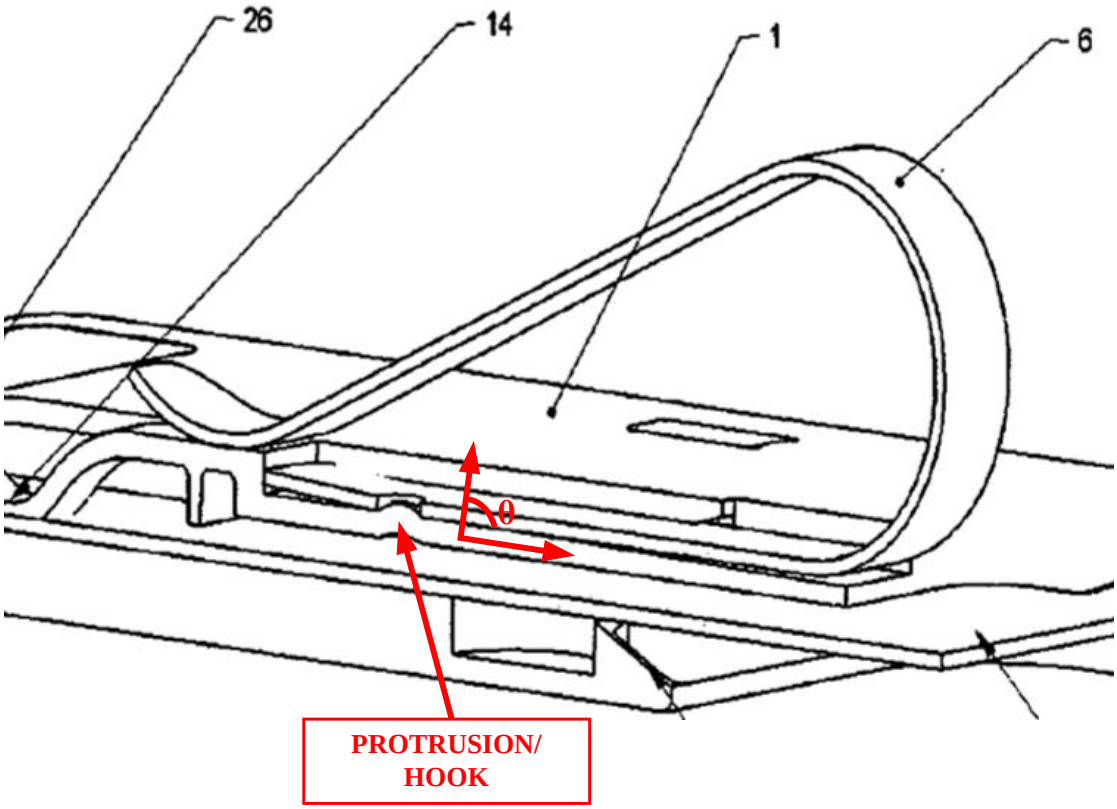
l. "the hook extending at an angle to the tang,"

1002. In my opinion, the Kane-Matthews discloses this limitation.

1003. Limitation "l" of Claim 19 does not delineate whether the "tang" is the tang of the first auxiliary feature or the tang of the second auxiliary feature. In my opinion, a POSITA would have understood the "tang" recited in limitation "l" of Claim 19 to be the tang of the second auxiliary feature given that antecedent basis for the "hook" is provided in limitation "k" of Claim 19, which in turn is understood to address the tang of second auxiliary feature.

1004. As discussed above in Sections IX.C.1.h (with respect to limitation "h" of Claim 1) and IX.C.13.h (with respect to limitation "h" of Claim 14), Matthew discloses a protrusion **24** ("hook") extending at an angle. For example:

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(*Id*. at FIG. 5 (*magnified, annotated*).)

1005. Further, a POSITA would have understood a rearrangement of the protrusion **24** ("hook") onto the tang of the clip **6** ("auxiliary feature") to be an obvious design choice to achieve the same functionality with predictable results. (*Id*. at ¶ [0038]: "it is recognized that departures can be made therefrom within the scope of the invention….") In doing so, in my opinion, the protrusion **24** ("hook") would extend at an angle from the tang of the clip **6** ("auxiliary feature") in the same manner as Matthews illustrates the protrusion **24** ("hook") extending at angle from the back piece **3**.

1006. The discussions of Claim 1 presented in Section IX.C.1.g and Section IX.C.1.h are incorporated herein by reference. Likewise, the discussions of Claim 14 presented in Section IX.C.13.g and Section IX.C.13.h are incorporated herein by reference.

1007. For example, a POSITA would have been motivated to configure a compact wallet, like that disclosed by Kane, with a clip (auxiliary feature") having a tang with a protrusion ("hook") extending therefrom, like that disclosed by Matthews, at least because Matthews and Kane are in the similar technical fields, address similar problems, utilize similar devices, and disclose structural features that, when combined, function in the same manner as each does separately to yield predictable results, as set forth in Section IX.C.1.e; which is incorporated here by reference. (Ex. 1006 at 2-3, 5, 7-8, 10-11, 15-16, and photographs thereof; Ex. 1009 at ¶¶ [0006], [0019], [0029], [0033], [0041], Claims 2 and 5-6, Abstract, FIGS. 1-5.)

1008. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 19.

m. "the at least one recess receiving the tang being disposed inside at least one of the two rigid plates;"

1009. In my opinion, the Kane-Matthews combination discloses this limitation.

1010. As discussed above in Sections IX.C.1.f and IX.C.13.e, with respect to limitation "f" of Claim 1 and limitation "e" of Claim 14, Matthews discloses a recess formed inside a back piece **3** of the card holder case **1**. (Ex. 1009 at [0033], [0041], Abstract, FIGS. 1-5.)

1011. To the extent it were found that the back piece **3** does not constitute at least one of the claimed "rigid plates," a POSITA would have been motivated to form a recess, like that disclosed by Matthews, inside one or more of the interior plate-outer faceplate pairs ("rigid plates"), like that disclosed by Kane, to effectuate the removable attachment of a clip, such as an initial clip ("first auxiliary feature") and/or a substitute clip ("second auxiliary feature") because Kane and Matthews are in the same technical field (*e.g.*, compact card holders), address similar problems, utilize similar devices, and disclose methods that when combined function in the same manner as each does separately to yield predictable results, as set forth in Section IX.C.1.e; which is incorporated here by reference. (Ex. 1006 at 2-3, 5, 7-8, 10-11, 15-16, and photographs thereof; Ex. 1009 at ¶¶ [0006], [0019], [0029], [0033], [0041], Claims 2 and 5-6, Abstract, FIGS. 1-5.) In doing so, the POSITA would apply a known technique to a known device ready for improvement to yield predictable results.

1012. Such a POSITA would have been motivated to form a recess, like that disclosed by Matthews, inside an interior plate-outer faceplate ("rigid plate"), like

that disclosed by Kane, to provide a removably attachable clip while minimizing the low profile of the wallet, which is described as a "core design" feature by Kane. (Ex. 1006 at 3: "Core Design: Low profile to easily fit in your front pocket; Ex. 1009 at ¶ [0041]: "This design allows for secure retention of the clip but also for user assisted removal if desired," Abstract: "The clip is removable so that another means of attachment… may be used to attach the case to any desired location.")

1013. For example, forming a recess, like that disclosed by Matthews, in an interior plate-outer faceplate pair ("rigid plate"), like that disclosed by Kane, would be a mere continuation of one or more milling operations conducted to form the plates. As such, forming a recess, like that disclosed by Matthews, in an interior plate-outer faceplate pair ("rigid plate") of a compact wallet, like that disclosed by Kane, would not require any additional machinery to manufacture, and minimal additional costs, if any. Such milling operations are routine and well within the ordinary capabilities of a POSITA at the time of the Critical Date.

1014. The discussion of Claim 1 presented in Section IX.C.1.f is incorporated herein by reference. Likewise, the discussion of Claim 14 presented in Section IX.C.13.e is incorporated herein by reference.

1015. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 19.

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

1016. In my opinion, Kane discloses this limitation.

1017. I explained earlier in Section IX.A.18.n that this limitation is disclosed by Kane. The discussion of Claim 19 presented in Section IX.A.18.n is incorporated herein by reference.

1018. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 19.

19. Claim 20

a. "The method of claim 19, wherein the at least one recess has an undercut and the at least one tang has a hook,"

1019. In my opinion, the Kane-Matthews combination discloses this limitation.

1020. As set forth above, the Kane-Matthews combination discloses each and every limitation of Claim 19, and said discussion is incorporated herein by reference.

1021. In my opinion, limitation "a" of Claim 20 is at least partially duplicative of limitation "k" of Claim 19. For example, a POSITA would understand "the at least one recess has an undercut," as recited in limitation "a" of Claim 20, to be equivalent to recitation of "the at least one recess having an undercut," as recited in

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limitation "k" of Claim 19. The discussion of Claim 19 presented in Section IX.C.18.k, is incorporated herein by reference.

1022. Further, limitation "a" of Claim 20 fails to delineate whether "the at least one tang" is of the first auxiliary feature or of the second auxiliary feature. However, in my opinion, a POSITA would understand "the at least one tang" recited in limitation "a" of Claim 20 to be of the first auxiliary feature; otherwise, limitation "a" of Claim 20 would be duplicative of limitations "i" and/or "j" of Claim 19.

1023. Moreover, as discussed above in Section IX.C.1.g, Section IX.C.13.g, and Section IX.C.18.k, Matthews discloses a protrusion **24** ("hook"), and a POSITA would have understood a rearrangement of the protrusion **24** ("hook") to extend from the tang of the clip **6** ("auxiliary feature") and of the corresponding hole **23** ("undercut") to be located in the recess in the back piece **3** to be an obvious design choice to achieve the same functionality with predictable results. (*Id*. at ¶ [0038]: "it is recognized that departures can be made therefrom within the scope of the invention….")

1024. The following discussions are incorporated herein by reference: the discussion of Claim 1 presented in Section IX.C.1.g; the discussion of Claim 14 presented in Section IX.C.13.g; and the discussion of Claim 19 presented in Section IX.C.18.k.

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1025. A POSITA, reading Kane and/or Matthews, would have understood an initial clip ("first auxiliary feature") would have included a protrusion ("hook"), like that disclosed by Matthews. In doing so, the initial clip ("first auxiliary feature") and substitute clip ("second auxiliary feature") would merely be duplicative parts interchangeable without any new or unexpected results.

1026. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 20.

b. "the hook and undercut interpositioned to secure the at least one auxiliary feature against inadvertent dislodgement."

1027. In my opinion, the Kane-Matthews combination discloses this limitation.

1028. Limitation 20b fails to delineate whether "the hook" is the hook of the tang of the first auxiliary feature or the hook of the tang of the second auxiliary feature. However, in my opinion, a POSITA would understand "the hook" recited in limitation "b" of Claim 20 to be the hook of the tang of the first auxiliary feature; otherwise, limitation "b" of Claim 20 would be duplicative of limitation "k" of Claim 19.

1029. As discussed in Section IX.C.1.i, Section IX.C.13.g, and Section IX.C.18.k, a POSITA, reading Matthews, would have understood the abutting of the protrusion ("hook") and corresponding hole ("undercut") to constitute an

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interpositioned arrangement that secures the associated auxiliary feature against inadvertent dislodgement. The following discussions are incorporated herein by reference: the discussion of Claim 1 presented in Section IX.C.1.i; the discussion of Claim 14 presented in Section IX.C.13.g; and the discussion of Claim 19 presented in Section IX.C.18.k.

1030. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 20.

20. Claim 21

a. "The method of claim 20, wherein at least one of the auxiliary features is a money clip."

1031. In my opinion, Kane discloses this limitation.

1032. As set forth above, the Kane-Matthews combination discloses each and every limitation of Claim 20, and said discussion is incorporated herein by reference.

1033. Further, Kane discloses multiple clips ("auxiliary features") serving as money clips. (Ex. 1006 at 4: "Improved traditional money clip design[,] Designed additional money clip with an internal spring (spring loaded), *Id*. at 6.)

1034. Moreover, a POSITA, reading Matthews, would understand that the same clip structure can be utilized to render a clip that attaches to garments or secures currency bills. In other words, a POSITA would understand that a clip, like that disclosed by Matthews, can constitute the claimed "money clip" (without any

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necessary structural alterations) should the user choose to secure money with the clip.

1035. Accordingly, in my opinion, the Kane-Matthews combination discloses this limitation of Claim 21.

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X. JURAT

1036. In signing this declaration, I understand that the declaration will be filed as evidence in a contested case before the Patent Trial and Appeal Board of the United States Patent and Trademark Office. I acknowledge that I may be subject to cross-examination in this case and that said cross-examination will take place within the United States. If cross-examination is required of me, I will appear for cross-examination within the United States during the time allotted for cross-examination.

1037. I hereby declare that all statements made in this Declaration of my own knowledge are true, that all statements made on information and belief are believed to be true, and further, that these statements are made with the knowledge that willful false statements and the like are punishable by fine or imprisonment, or both, under Section 1001 of the Title 18 of the United States Code.

Dated: 3/15/2024

By: 

James B. Babcock