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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

Mosaic Brands, Inc.,
Plaintiff,
v.
The Ridge Wallet LLC,
Defendant.

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

Kane Declaration in Support of Defendant
Ridge's Summary Judgment Motion

Date: April 23, 2021

Time: 10:00 a.m.

Judge: Birotte

I, Daniel Kane, declare:

1. I am the CEO of defendant The Ridge Wallet LLC ("Ridge"). I have personal knowledge of the facts stated in this declaration. If called to testify as a witness, I would competently testify on these facts.

2. All exhibits are true and correct copies of my identifications of them.

3. Exhibit 1 is a true and correct image of an assembled view of the Ridge wallet.

4. Exhibit 2 is a true and correct image of an exploded view of the Ridge wallet.

5. The Ridge Wallet is approximately 2.3 inches long and 1.5 inches wide. When empty, it is approximately 0.25 inches thick.

1 6. From its first prototype in October of 2012 until 2018, Ridge used a single
2 manufacturer for all of the Ridge Wallet products, Balance Industrial Group (Hong
3 Kong) Co., Limited (“Balance Group”).

4 7. The earliest email correspondence chain that Ridge has with Balance
5 Group begins on October 13, 2012 and continuing until November 21, 2012.

6 8. Ridge continues to use Balance Group for its manufacturing.

7 9. Advertising spend has almost doubled each year since 2014, with a signif-
8 icant increase in 2017 over the previous year. The associated revenue has grown dra-
9 matically over that time.

10 10. The overall advertising spend by Ridge from 2014 to 2019 is in the tens of
11 millions of dollars. During that time sales grew from hundreds of thousands of dollars
12 into the tens of millions of dollars.

13 11. Much of that advertising occurred using Facebook and Google advertise-
14 ments, but Ridge has also used television advertisements in that time.

15 12. When Ridge elected to use an elastic band to encircle the plates and urge
16 them together, centering the elastic band around either side balances the elastic en-
17 gagement to hold the plates and inserted cards in place within the wallet. Offsetting
18 the band to one side in either direction could allow “squeezing out” cards from the
19 wallet in the opposite direction when the wallet is in the user’s pocket. Because of
20 these considerations, I decided, centering the elastic band in both directions on the
21 wallet was its best placement.

22 13. After I used an elastic band encircling plates, I had few options for posi-
23 tioning the notch. I could have placed the notch along one of the short sides, which
24 could avoid the elastic band on the bottom, I decided having the notch along the
25 longer side makes reaching the notch with a finger while holding the wallet normally
26 was easier. That location also requires less force to push the cards than pushing from
27 the bottom because the compression friction is less. The shorter sides also less surface
28 area for a notch; it would use all or almost all of the available edge on a shorter side.

1 That would limit the width of the elastic band. The longer side of the Ridge wallet
2 has more room for the notch while allowing the elastic band to be wide enough on
3 each of the three sides to exert enough force on the cards to maintain them within the
4 wallet.

5 14. After I decided where to place the notch, I made it semicircular because us-
6 ers' rounded fingers or thumbs would be pressed into the rounded notch cutout. Ac-
7 cepting a user's finger to push out cards within the plates in a comfortable way with-
8 out sharp corners is a function of making the notch semicircular.

9 15. Each accused Ridge wallet's top and bottom panel is formed of two alumi-
10 num plates, an inner plate and an outer plate. Aluminum provides RFID-blocking
11 functionality for the wallet. Joins, the screws in the Ridge wallet, connect the outer
12 and inner plate to each other. The joins do not extend between the top and bottom
13 panels to allow receiving credit cards between the panels although the elastic band al-
14 lows the user to insert and remove cards only through one side, the longitudinal side
15 opposite the semicircular notch.

16 16. Having joins at each corner in a plate-based design is the most robust and
17 strongest way to join the two plates that make up each panel. One join is centered on
18 the side opposite the finger notch. The elastic band does not extend over that side, so
19 its join mounts in the center of the longer side. Two joins are on the side with the
20 notch along with the joins in the corner. The elastic band prevents having a join cen-
21 tered on the notch side, so the joins are spaced on the sides of the elastic band. The
22 joins' positions foreclose having the finger cutout at the corners.

23 17. I could have used over seven joins, but that would add to the material and
24 labor cost. The wallet might not be stable with fewer than seven joins.

25 18. The rounded corners of the top and bottom panels make inserting the wallet
26 into a user's pocket smoother, and hang-ups on clothing and other objects less likely.
27 Sharp corners also are more likely to scratch or cut a user. Because the wallet holds
28

1 credit cards, which have rounded corners, I wanted rounded corners for the wallet to
2 conform to the credit cards' corners to make the overall wallet as small as possible.

3 19. The shape of the money clip on the back of the wallet is functional. It must
4 exert enough force to hold money, and its raised end enables individuals to easily in-
5 sert currency. While working on designs for the clip, we found that a clip extending
6 far off the plate of the wallet itself was prone to hang when inserted into pockets or
7 even to damage clothing. So, we endeavored to balance the functions of easily and se-
8 curely holding money while still being compact.

9 20. Though Ridge's accused wallets are manufactured for Ridge, I designed
10 the accused wallet to make it simple to manufacture. Cutting the aluminum panels
11 and carbon fiber covers is a conventional process. The notch and holes for the joins
12 can be made during the cutting step, and forming the groove for the elastic band in
13 the aluminum panels is a simple manufacturing step. The sections of the one-piece
14 elastic band can be attached by adhesive or sewn.

15 21. Assembly is accomplished by aligning the band, panels and covers and fas-
16 tening the panels and covers with joins.

17 22. The Ridge Wallet conception began in late 2012, and culminated in two
18 very public Kickstarter campaigns in 2013.

19 23. Exhibit 3 is a copy of a printout of a Kickstarter campaign Ridge
20 launched for the "The Ridge: Front Pocket Wallet" which began on Jan. 22, 2013 and
21 ended on March 5, 2013. The project garnered 5,305 backers, pledging \$266,622 in
22 support.

23 24. Exhibit 4 is a true and correct copy of a printout of a second Kickstarter
24 campaign Ridge launched for the "The Ridge Wallet 2.0 which began August 31,
25 2013 and ended October 18, 2013. The project garnered 1,523 backers, pledging a to-
26 tal of \$126,873 in support.

1 I declare under penalty of perjury under the laws of the United States that the
2 foregoing is true and correct.

3
4 March 19, 2021

/s/ Daniel Kane

Daniel Kane

Exhibit 1

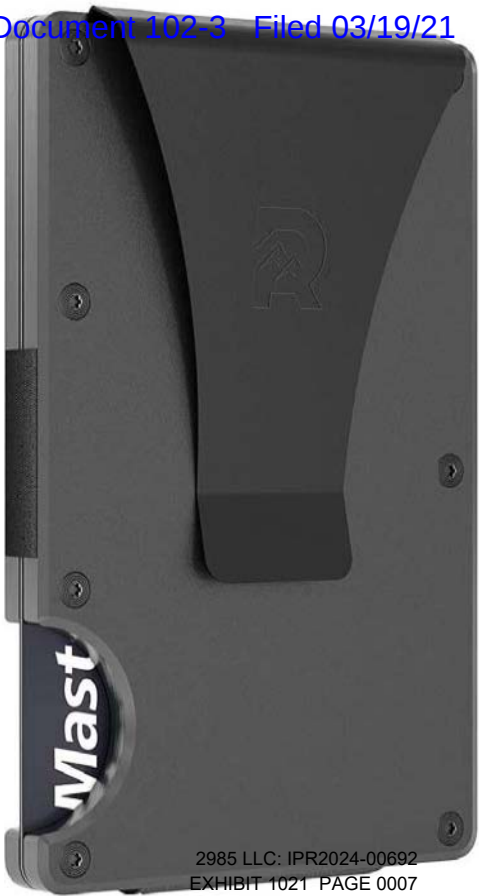
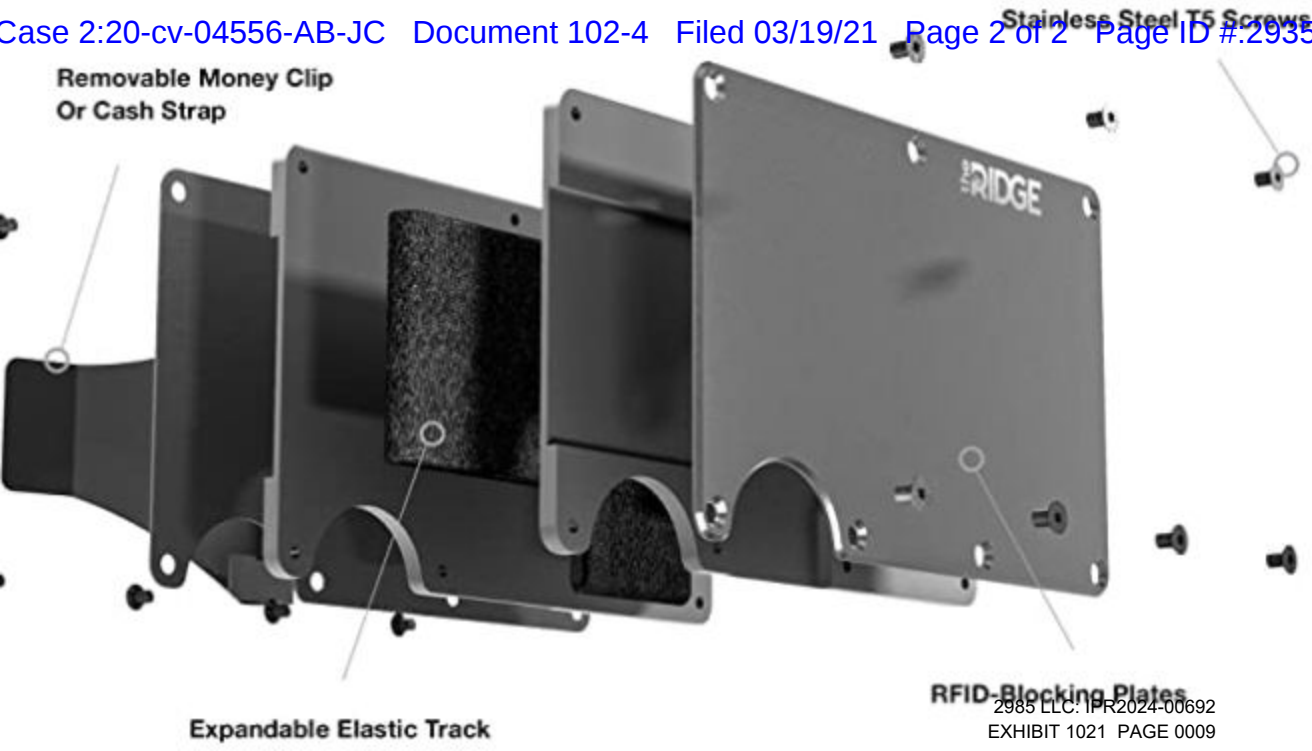


Exhibit 2



Expandable Elastic Track

RFID-Blocking Plates

Exhibit 3

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#BlackLivesMatter

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The Ridge: Front Pocket Wallet



More than a
minimalist wallet.
An Aluminum,
Titanium, and
Carbon Fiber
RFID-blocking
card holder and
money clip.

Buy Now!

Created by

Daniel Kane

5,305 backers pledged
\$266,622 to help bring this
project to life.

 **Last updated** June 11,
2014

Campaign

Rewards

FAQ ⁶

Updates ¹⁵

Comments ⁶⁸⁴

Community



The Ridge: Front Pocket Wallet

📍 Agoura Hills, CA 🛠️ Product Design

\$266,622

pledged of
\$12,000 goal

5,305

backers

STORY

Story

RISKS

AND

CHALLENGES

www.ridgewallet.com

Hey Kickstarter!

My name is Daniel and this is my dad, Paul, and we're here to introduce The Ridge. The Ridge is a slim, front-pocket wallet with metal construction that mixes old and new school without sacrificing

functionality. The integrated track avoids the bulk of a traditional folding wallet while expanding to allow the user to hold as few or as many cards as they would like. The slim aluminum and titanium exoskeleton form a wallet that provides easy access to cards and cash with the push of your finger. In tribute to the days before plastic, there is also the option of an integrated money clip. As a father/son team, we want to bridge the generation gap to create a durable wallet without added bulk.



world

564 backers

Pledge
 US\$ 76 or
 more

The "New"
 Ridge in
 anodized
 silver with
 silver Titanium
 outer plates

ESTIMA SHIPS
 TED TO
 DELIVER Anywh
 Y ere in
 Apr the
 2013 world

34 backers

Pledge
 US\$ 76 or
 more

The "New"
 Bridge in
 anodized
 black with
 black
 Titanium outer
 plates



The Story

The need for a front pocket wallet has been apparent to me for quite some time. If I was going out for the night or driving long distances, I didn't want to lug my bulky wallet around, especially when I only needed my I.D. and a credit card. I found myself leaving my wallet at home in favor of a rubber band securing a few cards and eventually took this a step further and made an elastic strap to replace my beloved rubber band. While I was back home for break, my dad began asking questions about my new card holder and asked why not make it a permanent solution that could hold *all* of your cards and cash. At first I was a little offended but after some constructive

criticism and brain-storming we came up with what we felt was an encompassing solution.

Our design criteria included a wallet that would first and foremost keep a low profile in your front pocket as well as alleviate lower back pain, block RFID skimming devices, utilize a singular construction (one piece design) without letting cards slip out of the bottom, expand and contract to hold various amounts of cards, and offer an optional money clip.





Lower back pain and your wallet:

Sitting on your wallet can lead to bad posture, misalignment of the spine, and a

nerve dysfunction known as *sciatic neuropathy*. By keeping your wallet in your back pocket, you put pressure on and damage the sciatic nerve. This nerve runs through your hip and down your leg and can cause lower back and knee pain when agitated (a problem my dad actually dealt with firsthand). The Ridge is slim enough to keep in your front pocket and thereby, avoid any harm to your spine or nervous system. It also avoids the simple, lopsided discomfort of sitting on a bulky wallet.



Here is Paul's actual wallet with the same number of cards and cash before and after switching to the Ridge.



RFID blocking (wireless identity theft):

Radio Frequency Identification is becoming an increasingly common feature on credit cards that allows the user to wirelessly "swipe" their card. However, the technology is inherently vulnerable as it lends itself to wireless identity theft.

Thieves use a portable, concealed scanner to wirelessly obtain credit card information from RFID-enabled cards in your wallet, a process known as "skimming". The Ridge's aluminum and stainless steel plates block RFID when fully inserted, keeping your information safe. A quick push of your finger exposes the cards, allowing you to utilize the convenience of RFID enabled cards without risk.

Singular Construction:

We wanted a sturdy, no-fuss wallet that couldn't come apart into several pieces, as many elastic wallets do. As such, the Ridge utilizes a one-piece design.

The optional money clip holds cash on the backside of the wallet and an indentation

at bottom left side of the wallet provides simple accessibility to your cards with the push of a finger. You can slide them out for easy RFID swiping and selecting the correct card.

How to access your cards:





Integrated expandable track:

The Ridge's "integrated track technology" is comprised of a durable elastic track incorporated into a hollowed section of the wallet's metal plates. The "T" design of the track secures cards from the bottom as well as the sides so nothing accidentally falls out of the bottom of the wallet. It will snugly hold one card or expand to hold numerous cards. The track is made out of a robust elastic material that has undergone several strength tests. It was expanded to an excess of 2 inches and when the cards were removed, it contracted to hold a single card securely.

Here you can see The "New" Ridge with 1, 3, and 8 cards.



Manufacturing

The finish of the wallet is a brushed anodized aluminum that's textured to stay in place in your pocket, and a polished interior aluminum that prevents scratches and allows your cards to slide smoothly. We have worked closely with two separate metal manufacturing facilities both domestic and abroad as well as a fabric manufacturer to source the elastic material. Your pledge will go directly into the tooling, production, and final assembly costs of the Ridge, which we are unable to feasibly produce on a small scale. If our goal is met, we will be able to manufacture the Ridge on a large enough scale to achieve the quality we want at a reasonable price.

Rewards

The Ridge is offered in a few different materials. The aluminum version incorporates brushed, anodized aluminum on the outer plates ("New" Ridge), with a separate option for a stainless steel money clip on the back ("Classic" Ridge). The titanium version utilizes durable outer titanium plates ("New" Ridge) with the option of a titanium money clip on the back ("Classic" Ridge).

The "New" Ridge are the versions without the money clip and the "Classic" Ridge are the versions with the money clip.

\$38 pledge: The "New" Ridge in anodized black.

front

back



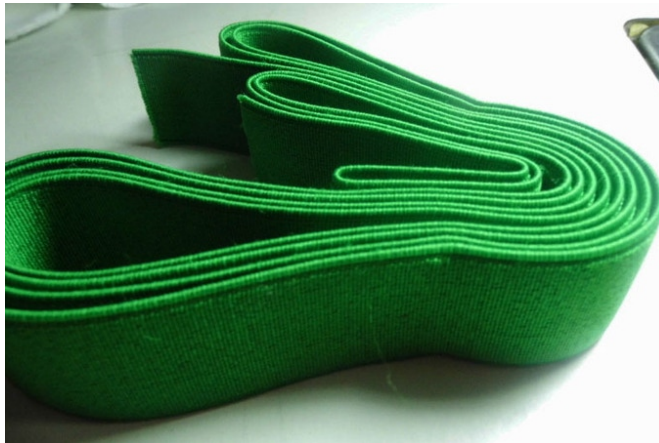
\$38 pledge: The "New" Ridge in anodized black (without engraved logo).

front

back



\$38 pledge: The "New" Ridge: Kickstarter special edition with green elastic and black anodized aluminum



\$38 pledge: The "New" Ridge in anodized silver.

front

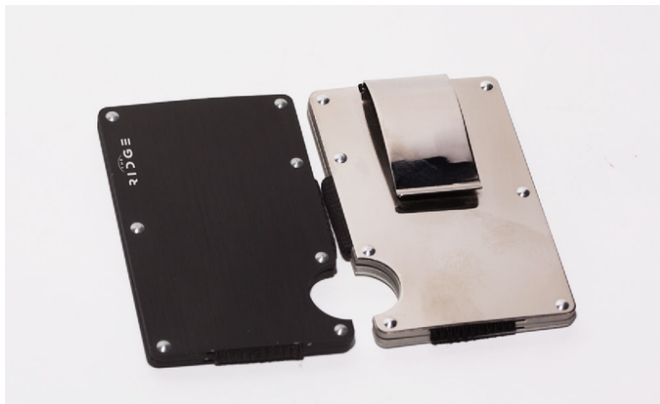
back



\$45 pledge: The "Classic" Ridge in anodized black with stainless steel money clip.

front

back



\$45 pledge: The "Classic" Ridge in anodized black with stainless steel money clip (without engraved logo).

front

back



\$45 pledge: The "Classic" Ridge in anodized silver with stainless steel money clip.

front

back



Dimensions: 8.5 cm (l) x 5.5 cm (w) x

0.55 cm

Weight: 1.9 ounces; 2.9 ounces
(with money clip)

Thanks again for your time and for
checking out our project!

Risks and challenges

We've gone through several prototypes
and lined up a manufacturer who has
produced this small batch of samples to
our specifications.

The main challenge we anticipate is
conveying our idea and product correctly
as well as spreading the word and
connecting with our backers. We don't
anticipate any setbacks and are confident
we can manufacture and distribute The
Ridge even if we exceed our goal.

My other challenge is being at university (I
am currently a senior at UCSB) and
completing my coursework while handling

the project. However, this is also my favorite part of the process as it acts as my motivation to stay focused and study hard. My dad and I have worked together in the past and work as a great team, fulfilling and coordinating the logistics of shipping and manufacturing several thousand pledges in my first Kickstarter project and we are excited to be working together again.

[Learn about accountability on Kickstarter](#)

Questions about this project? [Check out the FAQ](#)

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Exhibit 4

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The Ridge Wallet 2.0



More than a
Minimalist Wallet.
The re-designed
wallet system
constructed from
Aluminum,
Titanium, and
Carbon Fiber

Buy Now!

Created by

Daniel Kane

1,523 backers pledged
\$126,873 to help bring this
project to life.

📅 **Last updated** January
27, 2014



The Ridge Wallet 2.0

📍 Agoura Hills, CA 🔧 Product Design

\$126,873

pledged of
\$14,000 goal

1,523

backers

Story

Thank you! Come check us out at:

www.theridgewallet.com

Hey Kickstarter,

I'm Daniel and this is my dad, Paul, and we are here to introduce The Ridge 2.0; Designed to be an encompassing alternative to a bulky traditional leather wallet and a dedicated minimalist wallet that can only hold a few cards.

With an integrated elastic track, The Ridge 2.0 can accommodate various numbers of cards without losing elasticity; providing an extremely thin wallet that isn't limited in it's capacity.

Stretch Goal: add \$7 to your pledge to receive a spare black elastic and hex tool! Check out Update #3 for more info.





The Ridge 2.0 is the re-designed version of our wallet based on feedback from backers and our own real-world use for over a year! We went back to the drawing board to incorporate some key new features without sacrificing the original design.

The interior plates have been tapered at the edge to allow easier access to the middle cards, and re-machined with threads for 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.

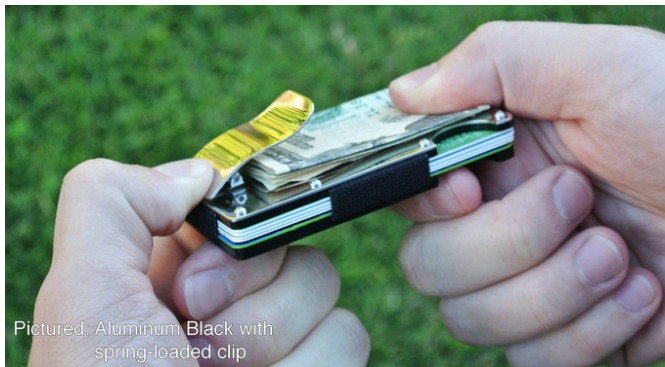
Core design:

- Low profile to easily fit in your front pocket

- Block RFID-skimming devices (wireless identity theft)
- Singular Construction that won't let cards slip out the bottom
- Expandable track that can accommodate a various number of cards
- Available in brushed natural and black

What's new:

- Re-Machined interior plates
- Improved and replaceable elastic
- Custom hex screws instead of rivets
- Interchangeable faceplates (swap materials and money clips)
- Improved traditional money clip design
- Designed additional money clip with an internal spring (spring-loaded)
- Improved metals including a spring steel
- Optional carbon fiber faceplates
- Greater selection of anodization (gunmetal and pink)

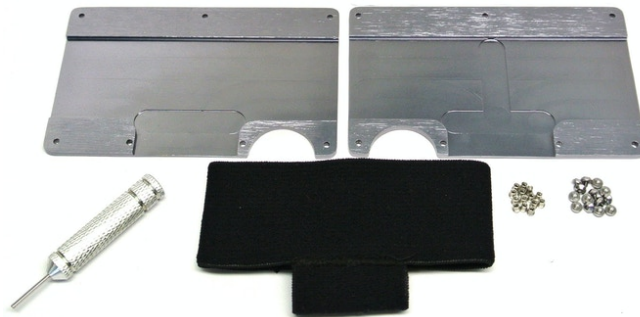


Construction

The Integrated Elastic Track can expand to hold up to 12 cards and then immediately contract to hold a single card securely. And should the elastic ever wear out, you can easily replace it.



The track runs along two hollow interior plates machined from anodized aircraft grade aluminum. The interior is hand-polished to prevent scratches and allow your cards to slide smoothly.



You can then choose between Titanium, Aluminum, or Carbon Fiber for the outer faceplates.

Aluminum options:



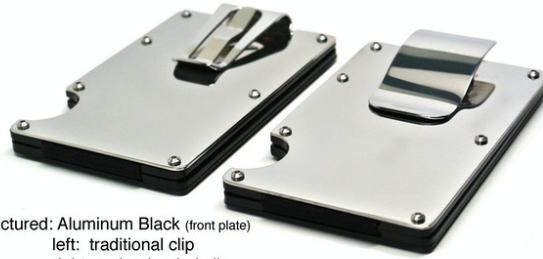
Titanium options:



The Ridge 2 is available with two different types of money clips or without a clip.



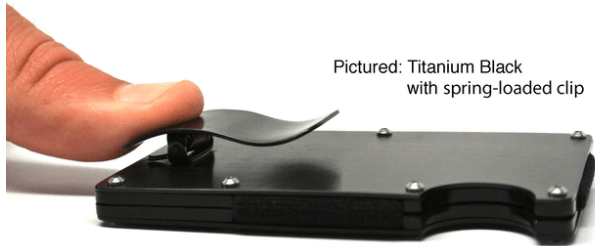
* On the Aluminum options with money clips, the clip and backplate will be a chrome spring steel to increase durability. The Titanium options will have a matching color backplate and clip.



Pictured: Aluminum Black (front plate)
left: traditional clip
right: spring-loaded clip



Pictured: Titanium Black
left: spring-loaded clip
right: traditional clip



Pictured: Titanium Black
with spring-loaded clip

Engraved logo on the upper right corner:



Seven hex screws machined from scratch
secure the inner and outer plates allowing
for replaceable elastic and
interchangeable faceplates.



Weight:

Aluminum outer plates without money clip: 1.9 oz

Aluminum outer plate with money clip: 2.7 oz

Titanium outer plates without money clip: 2.4 oz

Titanium outer plates with money clip: 2.5 oz

Carbon Fiber outer plates without money clip: 1.6 oz

Carbon Fiber outer plate with titanium money clip: 2.1 oz

Accessing Your Cards:

The Thumb indentation at the lower left of the wallet allows you to easily push your cards up and select the correct one.

The top of the inner plates are tapered to let you easily slide additional cards into the wallet.



RFID blocking (wireless identity theft):

Radio Frequency Identification is becoming an increasingly common feature on credit cards that allows the user to wirelessly "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.

Lower back pain and your wallet:

Sitting on your wallet can lead to bad posture, misalignment of the spine, and a nerve dysfunction known as *sciatic neuropathy*. The sciatic nerve runs through your hip and down your leg and

can cause lower back and knee pain when pinched (a problem my dad actually dealt with firsthand). The Ridge is slim enough to keep in your front pocket and thereby, avoid any harm to your spine or nervous system. It also avoids the simple, lopsided discomfort of sitting on a bulky wallet.



Manufacturing:

We have learned a lot since producing our original design, most of which came from real-world use and feedback from backers. We've listened to suggestions and gone through several additional prototypes from manufacturers at home and abroad to create the second iteration. As of now, each wallet is a one-off design that requires custom tools, benders, and moulds to produce on a large scale.

If we reach our goal, as a reward you will receive a wallet from the first large-production run of The Ridge 2.0!

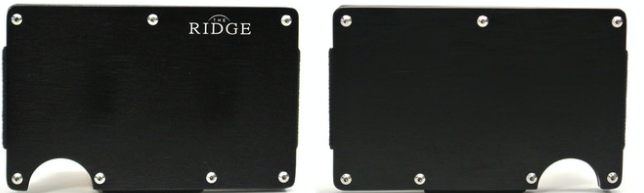
Rewards



Natural Aluminum without money clip



Gunmetal Aluminum without money clip



Black Aluminum without money clip



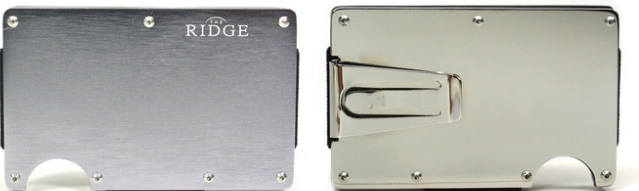
Pink Aluminum without money clip



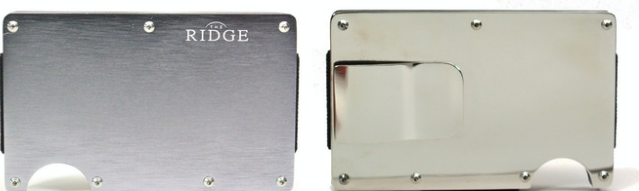
Natural Aluminum with traditional money clip



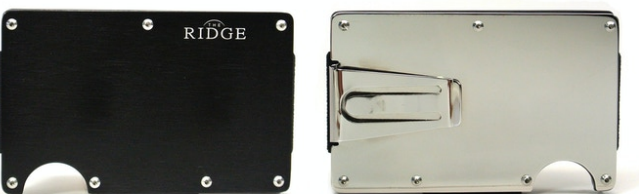
Natural Aluminum with spring-loaded money clip



Gunmetal Aluminum with traditional money clip



Gunmetal Aluminum with spring-loaded money clip



Black Aluminum with traditional money clip



Black Aluminum with spring-loaded money clip



Natural Titanium without money clip



Gunmetal Titanium without money clip



Black Titanium without money clip



Natural Titanium with traditional money clip



Natural Titanium with spring-loaded money clip



Gunmetal Titanium with traditional money clip



Gunmetal Titanium with spring-loaded money clip



Black Titanium with traditional money clip



Black Titanium with spring-loaded money clip



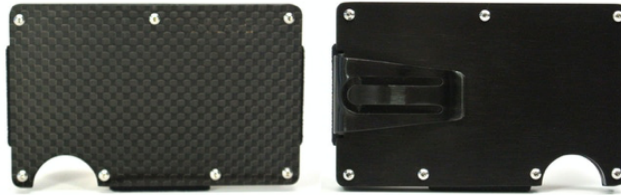
Kickstarter edition (Titanium and green elastic) with traditional money clip



Kickstarter edition (Titanium and green elastic) with spring-loaded money clip



Carbon Fiber without money clip



Carbon Fiber with Titanium traditional money clip



Carbon Fiber with Titanium spring-loaded money clip

Stretch goal rewards:



Pink Aluminum with traditional money clip



Pink Aluminum with spring-loaded money clip

Thank you Kickstarter!

Campaign

Rewards

FAQ

Updates ¹¹

Comments ³⁷¹

Community

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people and preferences. We believe this new version has much more flexibility in terms of both aesthetics and ease of use.

The next challenge is production standards, quality control, and fulfillment if our goal is reached. We are very confident in our ability as my dad and I have worked on several projects together, from sending out small batch orders over a long period of time to fulfilling several thousand pledges in a few months. We understand each others strengths and weaknesses and complement each other very well in a work environment as well as our personal lives which makes the entire process very enjoyable.

-Paul and Daniel

[Learn about accountability on Kickstarter](#)

DELIVER Y Anywh
ere in
Jan the
2014 world

43 backers

Pledge
US\$ 105 or
more

The Ridge:
Carbon Fiber
outer front
plate with
black
Titanium
traditional
money clip.

ESTIMAT SHIPS
ED TO
DELIVER Y Anywh
ere in
Jan the
2014 world

49 backers

Pledge
US\$ 105 or
more

Questions about this project? [Check out the FAQ](#)

The Ridge:
Carbon Fiber
outer front

[Report this project to Kickstarter](#)

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