

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

Case IPR2024-00692
Patent 10,791,808

DECLARATION OF DANIEL R. KANE

I, Daniel R. Kane, hereby declare as follows:

1. I am over the age of 18 and competent to issue this declaration.
2. I am the Founder and currently the Chief Product Officer of Patent Owner The Ridge Wallet LLC (“Ridge”). Ridge is a company I started to sell one of my inventions, which is a slim, metal, front-pocket wallet.
3. I am the sole named inventor of U.S. Patent No. 10,791,808 (“‘808 Patent”), which I understand is Ex. 1001 in this proceeding. I invented all the subject matter contained therein in or around the summer of 2016.
4. I submit this declaration to address certain issues I understand are relevant to the *Inter Partes* Review filed by 2985, LLC d/b/a Mountain Voyage Company LLC (“Mountain Voyage”). Mountain Voyage is the largest of dozens (if not hundreds) of companies that are selling, or have sold, knockoff Ridge wallets on Amazon.com—all of which postdate my invention. We have been in litigation with Mountain Voyage (and several other such knockoff sellers) since early in 2023.
5. I have reviewed Ex. 1006 in this *Inter Partes* Review proceeding. That document appears to be a printout of a Kickstarter web page I created for a campaign to sell an early version of the Ridge wallet in approximately 2013.
6. With the early version of the Ridge wallet (such as what is shown in Ex. 1006), I wanted to avoid the bulk of a traditional leather folding wallet while still providing access to cards, IDs, and that kind of thing. So, I came up with a way

to integrate elastic into the overall exoskeleton and provide secure storage for several cards while providing a wallet that took up as little space as possible.

7. Even in the earliest iterations of the Ridge wallet, there was a way to hold cash if a user wished to do so. In particular, the version of the Ridge wallet shown in Ex. 1006 actually had external face plates that included an integrated money clip for people that carried around cash (or receipts, or other pieces of paper) as well as cards. When I say “integrated,” what I mean is that the money clip was either bent from the same piece of metal, or was welded or riveted to the outside of the wallet. But, in either case, that money clip in the early versions of the product was not removable by itself—if you wanted to remove the money clip, you needed to remove the entire outer plate on one side of the wallet.

8. I will note that in the even earlier iteration of the product (the one before the Kickstarter campaign shown in Ex. 1006), the outer plates could not be removed from the wallet at all; they were welded on. Given manufacturing techniques, desired strength, and material properties, I did not try to include a money clip that was removable in and of itself; while we innovated by providing for removable outer plates in the product shown in Ex. 1006, at the time we were still only thinking about selling wallets with “integrated” money clips. At that time, I was not aware of manufacturing techniques that would have permitted me to create removable money clips.

9. One of the biggest unlocks we recognized with the version of the Ridge product shown in Ex. 1006 was the use of the “integrated elastic track” as described, for example, on page 2 of Ex. 1006. That allowed us to buck the trend of other kinds of card cases, where the case was often the same size and shape regardless of how many cards it held. By using elastic and a pair of “sandwiches” for outer plates, I created a wallet that was only as thick as was absolutely necessary. That was a huge selling point for the Ridge wallet in 2013. We wanted to be minimalist, and the designs I was considering always put that goal first and foremost. If it didn’t get thinner with fewer cards, it was not relevant to our product vision.

10. In fact, the Kickstarter page shows that exact concept:



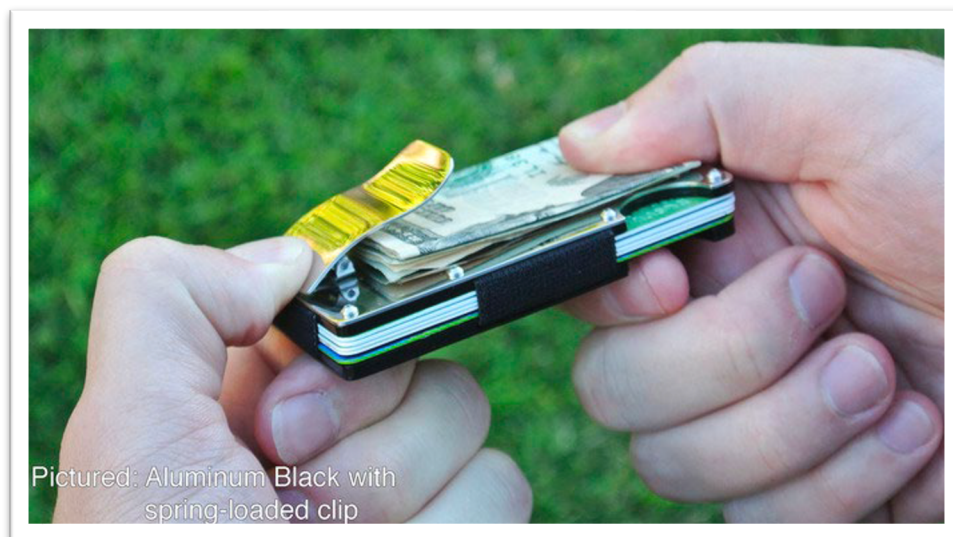
Ex. 1006 at 5. The wallet is less than half as thick with one card as it is with ten cards.

11. Ex. 1006 also talks about “personalization.” It says that “[t]he 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.” Ex. 1006 at 3.

12. At that time, the “personalization” permitted by the “system” did NOT involve the ability to change out money clips. As I mentioned later in the post, “[a]s of now, each wallet is a one-off design that requires custom tools, benders, and moulds to produce on a large scale.” Ex. 1006 at 9.

13. At the time, and with that product iteration, we did not consider the possibility for a removable money clip. I was focused on keeping the product thin while providing a way to hold cash, but I did not contemplate trying to incorporate a removable money clip part. There was no way I was aware of, at that time, to make a money clip removable but still have it work with the sandwiched outer plate design while maintaining minimal thickness, limited to the size of the contents of the wallet. And as I mentioned, that sandwiched outer plate design was of critical importance. If it didn’t get thinner with fewer cards, I wasn’t interested.

14. You can see from the document that the “innovation” on money clips at that time was in the actual shape of the clip part—“Improved traditional money clip design” and “Designed additional money clip with an internal spring (spring-loaded).” Ex. 1006 at 4. Those designs are illustrated in the document:



Ex. 1006 at 4.

15. At that time, I never considered the possibility that I could come up with a removable money clip design that would maintain the expandability of the wallet to permit it to be as thin as was absolutely possible. When we wrote about

personalization, the thought was that one could personalize their wallet experience by changing plate colors, not swapping out or making removable the money clips. You can further see that where we wrote that “Seven hex screws machined from scratch secure the inner and outer plates allowing for replaceable elastic and interchangeable faceplates.” Ex. 1006 at 7.

16. The early iterations of the Ridge wallet with the integrated money clip were on the market (either via Kickstarter or, later, on Ridge’s website) until the mid-2016-time frame. Our records indicate that we sold about \$5MM worth of those early product designs in the 3-4 years they were on the market.

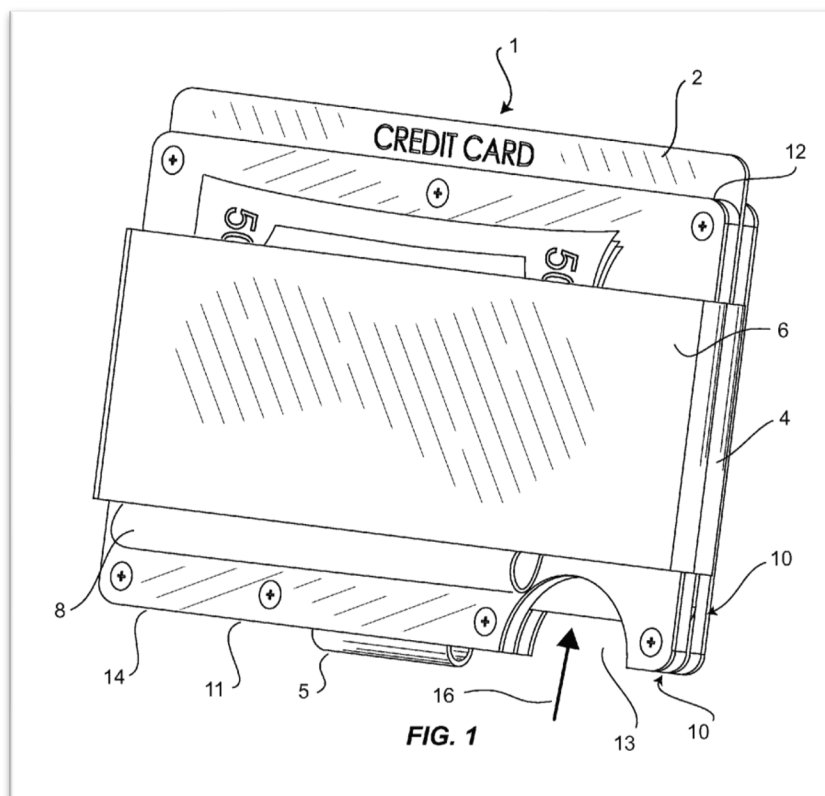
17. After the Kickstarter launch reflected in Ex. 1006, we continued to work on product development in pretty much everything we did. We were a young company that was introducing its first product. Our goal was to find something that people wanted to buy, and if what we had wasn’t that, we wanted to make our product better.

18. That product development work led me to recognize that the money clip aspect of the original Ridge wallet was limiting and could be improved. Customers did not love it like I thought they should, and I realized that was because the money clip was an inflexible feature. It could not be removed without purchasing an entirely new outer plate. Also, if it broke (which it did from time to time), we had to replace the entire outer plate. And most irritatingly, we had to stock all colors

of outer plate/money clip parts. We certainly couldn't put a carbon fiber outer plate on a black aluminum wallet, or vice versa—the customers would never have stood for it.

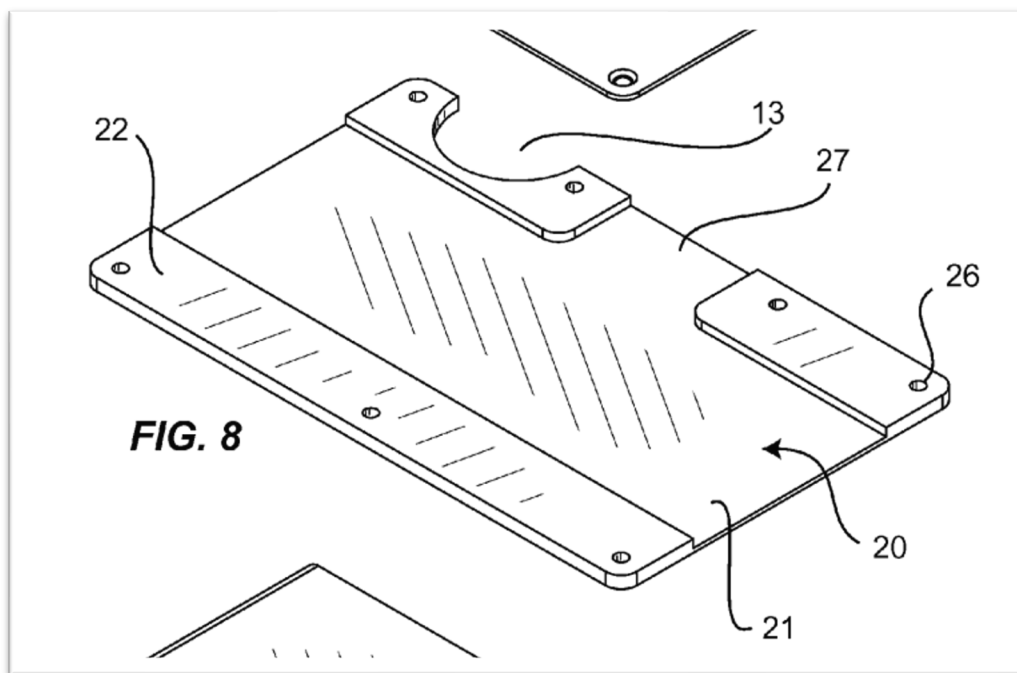
19. We spent an awful lot of man hours (and dollars) buying and installing replacement plates to deal with broken money clips. That took away from our efforts to sell wallets to new customers. But we knew we wanted to offer a lifetime warranty, so we just dealt with it for far too long.

20. One way we tried to address the limitations of the integrated money clip was to come up with a cash strap variant of the product. We filed a patent on that invention on May 7, 2015, which included the following design:



Ex. 2011 at Fig. 1.

21. That design did not have a different internal structure than the Kickstarter design; the only area of the plates that has been removed is the area to accommodate the T-shaped elastic strap:

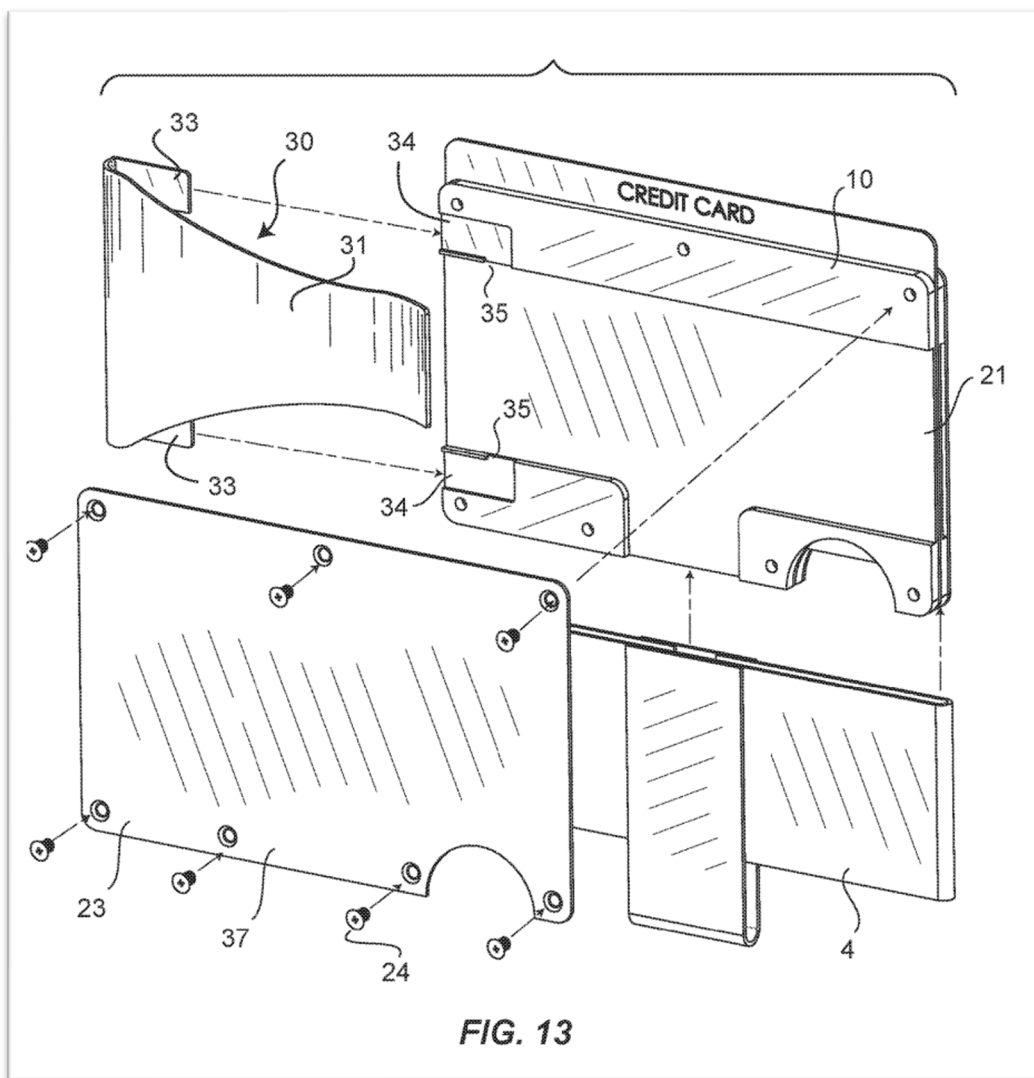


Ex. 2011 at Fig. 8.

22. After I filed the application about the cash strap, I continued working to improve the design of the Ridge wallet product. Finally, in the summer of 2016, I came up with the design that turned out to be the huge unlock that caused Ridge to become the company it is today. I figured out a way to provide a money clip that was removable, but did not change the outer dimensions of the wallet. By using hooks that engaged with new cut-out areas in the body of the wallet that we created

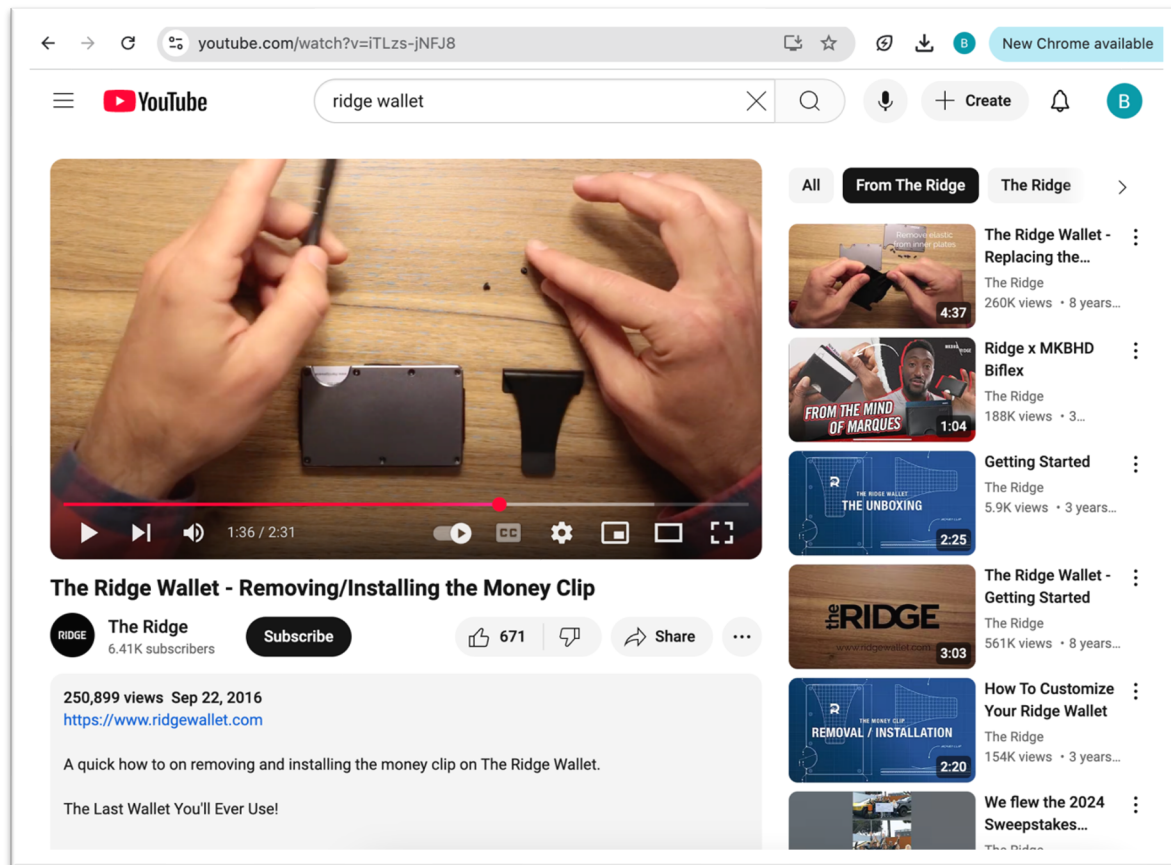
during manufacturing, I was able to create a product where a user could truly remove the money clip, replace it, or not use it all if he or she did not want. When the money clip was not in the wallet, it was still perfectly functional. And most importantly, the wallet stayed just as slim as the original design from the Kickstarter campaign.

23. That design can be seen in the '808 Patent, including for example in the following picture:



Ex. 1001 at Fig. 13.

24. Ridge’s first two YouTube videos under its formal Ridge Wallet YouTube account feature this design, and were posted in September of 2016. One of those videos, titled “The Ridge Wallet – Removing/Installing The Money Clip,” demonstrates that design:



Ex. 2012. You can see that this video has more than 250,000 views, and in the particular screen shot we included above you can see the shape of the back of the money clip, with its “tang” and “hooks” (to use the words the ‘808 Patent uses).

25. Ultimately, the market loved the new design. It was crazy—that really was our lightning in a bottle. We were doing pretty well before that, but when we

went to the removable money clip variant, things really took off. We started selling wallets as fast as we could make them, and that design really just seemed to click with people. While it's hard to pinpoint an exact date, the design we put into the '808 Patent was the thing that seemed to take us from doing pretty well to doing so well we needed to expand the company drastically. It was clear that we had found something that people were looking for, but not getting from our prior designs. We sell our products at the highest price point of our competitors—we are the original and still the top, compact wallet in the space. And we can still charge a premium price because of it.

26. Looking back at the overall product evolution, the first Kickstarter iteration did not even have outer plates that could be removed—its outer plates were riveted to the inner plates. If the money clip broke, the entire wallet needed to be scrapped. In the second iteration (Ex. 1006), we improved that slightly, so that if a money clip broke, one plate could be replaced. But it was not until the 2016 iteration (which is shown in the '808 Patent) that we settled on the solution that we've been using for almost 9 years now – the one that allowed our business to scale to the size it is today. It took a lot of work, and invention, to figure out the solution to the problems that were still present in the product shown in Ex. 1006. And given the way the business has gone, we know the '808 Patent is the right solution.

27. The Petitioner in this proceeding, Mountain Voyage, is one of many, many companies that have copied Ridge's products and is operating as an Amazon.com drop shippers selling knockoff Ridge wallets. It is also the largest such company, and happen to be based in the United States.

28. I am submitting this declaration to address two items I understand are relevant to this particular proceeding.

29. First, this declaration explains that until I came up with the inventions of the '808 Patent, I (and others in the space) was not considering combining externally mounted money clips with the expandable, minimalist design of the Ridge wallet.

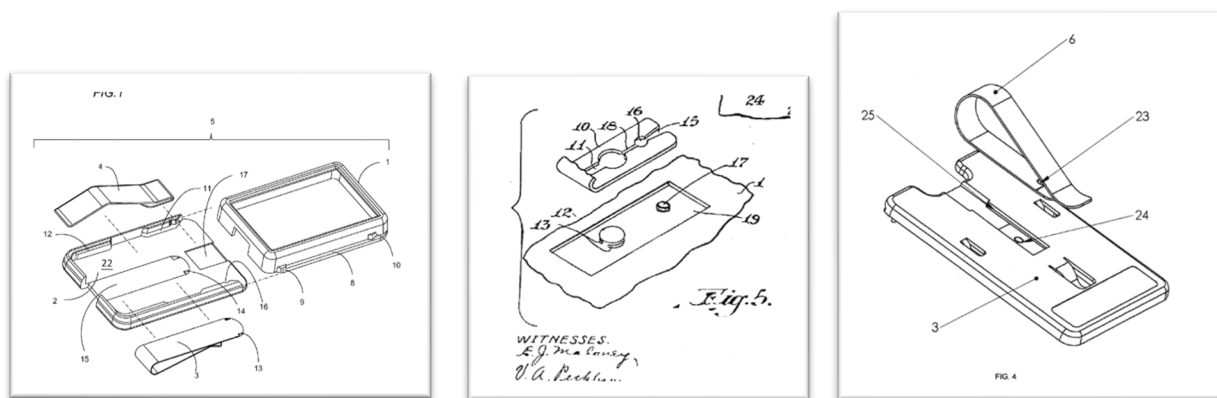
30. Second, this declaration addresses what I understand are called "secondary considerations," or "objective indicia," of non-obviousness. Based on my understanding of the factors, Ridge's experiences in the marketplace, including the success it has had and the copycats it has seen since the filing of the '808 Patent, serve as objective evidence (evidence where it's not just somebody's opinion) that the '808 Patent is not obvious.

I. DESIGN CONSIDERATIONS

31. The first issue I am addressing in this declaration is the argument I understand Mountain Voyage is making about combining certain things with the designs contained in the Kickstarter publication. I am not a lawyer; I address these

issues solely to discuss what I was thinking and doing after the Kickstarter page published and before I was able to invent the design shown in, for example, Figure 13 of the '808 Patent. That is, my declaration on this point is merely factual about what I was *actually* thinking and *actually* doing leading up to the filing of the '808 Patent.

32. I understand from my counsel that Mountain Voyage proposes to modify the Kickstarter design with three different money clip designs, which I reproduce below for convenience:



Ex. 1007; Ex. 1008; Ex. 1009.

33. The designs above were simply not options that would have worked with the Kickstarter design as an option for adding a money clip to the outside of the wallet.

34. The first design above (Ex. 1007) would not have worked with the Kickstarter product because it is a very simple structure that simply clamps around the single layer plate. The product in the Kickstarter campaign relied on a

sandwiched pair of plates to accommodate the elastic band and to permit the RFID blocking technology to be incorporated in the product. That is why the designs in the Kickstarter campaign are what they are: they are either surface mounted on the outside of the wallet, or are integrated into the metal that forms the outer plate. They did not interact with the elastic band, and they did not interfere with the sandwiched plate design of the product. As a product designer, I was not considering designs like the first one above because it simply would not have been suitable as a money clip for the product whose features were what we discussed in the Kickstarter campaign.

35. The second and the third designs above (Ex. 1008 and Ex. 1009) would not have been compatible with the minimalist design concepts that underscored the Kickstarter product: the outer plates were a sandwich structure to accommodate the elastic band (a critical concept) and the product expanded and contracted with the thickness of the cards inserted. The second and third designs above would not have worked in those designs because they require a thickness in the outermost plate of the product that would have destroyed the design concepts of the Kickstarter products. Etching away (or otherwise removing) enough material from the outer plate to provide the mounting structures in the second and third designs above would either have cut all the way through the outer plate, or would have required the thickness of those outer plates to increase to accommodate the mounting structures

shown above. Neither of those solutions would have done what I knew needed to be done to make the wallet a minimalist product with as small a thickness as possible.

36. The solution I invented also had the notable benefit of providing no visual or aesthetic disruption to the outside of the wallet. Whether a money clip is installed or not, you cannot see anything but a pair of <1-millimeter slots on the end of the wallet to even give you a sense that the wallet can accommodate a money clip. This was a further part of our minimalistic ethos at the company, and another great achievement due to the inventions in the '808 Patent.

37. In short, the key design consideration for the Kickstarter product was a minimal thickness for the number of cards being held. The above three designs all rely on something with relatively thick outer dimensions that do not change depending on what is inside the box. As a product designer whose key consideration was maintaining the minimal silhouette and thickness of the wallet, those designs were simply not something that would have been reasonable to consider in potentially modifying the product.

38. The design process from the Kickstarter page to the ultimate launch of the product that is shown in the '808 Patent in September, 2016, took several years; that was because it was not trivial to find the solution that I ultimately invented to maintain the minimalist product I knew we needed to have, and to give users the modular money clip I thought customers might prefer to the non-modular, unitary

money clip designs available on the Kickstarter page. I had to overcome many design challenges and solve several problems, as outlined herein, to effectively produce the iteration of the product that went to market in late 2016 and that embodies the invention of the '808 Patent.

II. SECONDARY CONSIDERATIONS

39. I have also been asked to discuss so-called “secondary considerations of non-obviousness.” I am not a lawyer, and prior to my work at Ridge have not been involved with patents or patent litigation. I understand from my counsel that the following is a non-exhaustive list of things that are objective facts (i.e., they aren't somebody's opinion) that can indicate that the claims are not obvious:

- a. long-felt but unmet need
- b. failure of others
- c. commercial success
- d. copying
- e. licensing
- f. unexpected results;
- g. industry praise

40. As I discuss below, I believe a number of these items are present with respect to the money clip version of the wallet I invented in 2016 and that was described in the '808 Patent when it was filed in February, 2017.

41. Preliminarily, I have been asked to review excerpts of a witness statement submitted by our expert, Dr. Thomas R. Kurfess, in the ITC case we completed in 2024. Ex. 2019. I can confirm that the witness statement of Dr. Kurfess contains photographs that are accurate representations of the compact wallet products we began selling in the summer of 2016 and continue selling today, particularly with regard to the design of the money clip, its tangs/hooks, and the internal structures inside the wallet to accommodate the money clip.

42. I also note that the products look very similar to the pictures of the removable money clip (and corresponding plate design) in the '808 Patent, which is unsurprising because we used those parts as the basis for the images in the '808 Patent.

a. long-felt but unmet need

43. The designs I invented in 2016 and that were the subject of the '808 Patent satisfied a long-felt, but unmet, need. Ever since the 2013 Kickstarter campaign, the money clip configuration of the wallets left users wanting for more functionality. We did not realize it at the time, but apparently the ability to change or eliminate the money clip by removing or swapping out the entire outer plate was not acceptable to users.

44. I suspect that is because it was expensive and cumbersome to remove and replace the plate as a whole. In addition, if a user wanted to change just the

color of the plates, that was not possible without purchasing an entirely new outer plate with its attached new money clip as well. Finally, when we started selling the cash strap and the money clip versions of the wallet at the same time, the designs that permit installation and removal of the money clip permitted quick changing from the cash strap to the money clip.

45. These needs were not met by the designs shown in the Kickstarter, and to my knowledge were not met by any other product until the Ridge redesign in 2016. I have kept a close eye on the market since 2014, and I am confident that I would have known if someone else was able to satisfy that need in the market.

46. Objective evidence confirms this. Since we introduced the modular money clip design in 2016, sales of Ridge wallets have exploded. Ex. 2013 is a year-by-year revenue summary beginning in 2014 and continuing through 2024 (data from 2013 is not available in our current accounting systems). This is revenue for “EDC,” or “Everyday Carry,” which is predominately wallet sales. I understand from our accounting team that approximately 1-2% of these numbers each year are for non-wallet products like pens, and that number has been reasonably consistent throughout the company’s existence.¹ Notably, EACH wallet we have sold since mid-2016 has the features inside of it that accommodate a removable money clip,

¹ I note that this data is not “official” in the sense that it does not form the basis for audited financial information or tax return information. It is near-final data that our finance team pulled from the sales management system we use at my request.

and those designs mirror the designs Dr. Kurfess discusses in his ITC witness statement. Ex. 2019.

47. As can be seen in Ex. 2013, sales of the wallets saw a drastic uptick in 2016 when we launched the design now protected by the ‘808 Patent. 2017, which was the first full year of sales of that product, was when we cracked the magical “8 figure” barrier for wallet sales, and we cracked the “9 figure” barrier selling the same wallet design in 2023. These are both major achievements for e-commerce companies. Many companies can sell single digit millions of sales, but in the space cracking \$10MM and then \$100MM is somewhat rarified air.

48. The features embodied in the ‘808 Patent have been a major driver of this commercial success, as it is those features that have allowed us to operate our business at a scale where we can practically sell \$120MM worth of wallets in a year for the reasons I discussed previously.

49. The increase in sales velocity demonstrates that a need existed prior to the introduction of the new product in 2016, and was not met until we introduced the new design in 2016 that we were able to break out of the 7-figure range that many brands (including, I believe, Mountain Voyage) find is a cap on annual sales.

50. In addition, the marketplace’s reaction to the launch of our 2016 design was shocking, to say the least. Prior to the filing of the ‘808 Patent, we were not seeing knockoffs coming out of China. The market wasn’t as mature at that time,

but we really saw the uptick in knockoffs start in the years after we came up with the ideas in the '808 Patent. The Chinese factories seemed to know they couldn't sell product if it didn't have the removable money clip idea, along with the internal structures that you needed to make that work. That indicated to me that I'd come up with the secret sauce in the '808 Patent: similarly to what we saw with our business really taking off when we incorporated that feature into our products, it seemed like the Chinese factories started to think they had something saleable when they incorporated the patented features of the '808 Patent into their knockoff products.

51. In fact, the first time we saw a real knockoff was sometime in 2020. We were sued for patent infringement by a brand called "Storus," which we sometimes also refer to as "Mosaic," and that was the first time I saw a product (Storus' product) that was *identical* to our product. They first sued us in the spring of 2020, which is when we discovered that their product was a knockoff directly from China. This was the first instance of our discovery of the potential that Chinese factories were knocking off the design I developed in mid-2016.

52. It was generally part of my practice at Ridge to keep an eye on the industry that I had created. In the 2010's, I lived compact wallets and strongly believe that if there had been other knockoffs out there, I would have known about them.

53. With respect to Mountain Voyage, it is my understanding that Mountain Voyage did not get its start until 2021 when it decided to buy a knockoff Ridge wallet, slap its logo on the product, and start drop-shipping with Amazon. This coincides with what we generally saw in the market, which was that the proliferation of knockoffs really started in 2021.

b. failure of others

54. As I mentioned, we did not see knockoff competitors until 2020, when Mosaic sued us in California. Thus, it was not until Chinese factories had our products to copy and sell at a mass production scale that we saw competitors using our design.

55. Moreover, the fact that there were no compact wallet competitors in the market prior to 2016 *at all* demonstrates that nobody came up with the solution I invented until I did in 2016.

56. Finally, the products shown in Ex. 1007, Ex. 1008, and Ex. 1009 do not provide the expandable, minimalist, RFID-blocking wallet my invention does; that this is the best prior art Mountain Voyage can come up with (other than my prior work) demonstrates that those in the space did not solve the problems I did with the '808 Patented inventions.

c. commercial success

57. As I noted above, the company has been wildly successful since we introduced the new design in 2016. Ex. 2013 shows our increasing wallet sales beginning in 2014 and proceeding through the end of 2024. In addition, given the popularity of the wallets, we have been able to partner with NFL, Major League Baseball, NCAA schools, Peanuts, NASA, and a number of YouTube creators and artists to sell products bearing their logos. Ex. 2014 is a current printout of our website and shows all the organizations who have wanted to partner with us. I will also note that to Ridge's knowledge, no other compact wallet infringers have been able to execute similar licensing deals.

58. None of that success existed before 2016, and as I mentioned every single wallet we have sold since the launch of the new design in 2016 has the features inside that accommodate the modular money clip; that was the major feature addition with the launch in that time frame.

d. copying

59. We see deliberate copying all the time. Ex. 2015 is the spreadsheet we have been sending to the United States Customs and Border Patrol team helping us enforce our General Exclusion Order (Ex. 2009) that shows the *manufacturers* we are aware of that have knocked off our designs. The number of customers (like Mountain Voyage) who have purchased from these manufacturers and sold to customers in the United States is likely orders of magnitude larger.

60. In addition, Ex. 2016 is a set of photos of products we ordered anonymously from one of those Chinese manufacturers that exactly mirrors our Burnt Damascus product, and even contains the Ridge logo on the money clip. Ex. 2017 is a printout of our website for the Burnt Damascus Ridge wallet, showing just how identical the products are. We are plainly seeing copycat products coming from Chinese manufacturers and making their way into the U.S. sales chain.

61. We were also able to secure a preliminary injunction against one of the biggest manufacturers of knockoff Ridge wallets in China in a case in the Northern District of Illinois. Ex. 2022. The factory, called “X-World,” chose not to show up and defend itself, opting instead to be forced to cease and desist infringing the ‘808 Patent by virtue of an Order of a Federal Court. This demonstrates that one of the largest copyists out there was not willing to fight the validity of the ‘808 Patent, in recognition of its strength.

62. Mountain Voyage’s founder has also admitted that he is a deliberate copyist. In an interview he gave in 2023 to Business Insider, he admitted that he “emulate[d]” the Ridge wallet design. Ex. 2008 at 7. That same article demonstrates my point above that by 2021, Chinese manufacturers were offering their infringing wares on Alibaba.com for people like Mountain Voyage to buy, put a logo onto, and sell on Amazon.com.

63. Ex. 2018 is also a set of website printouts for a recent infringer on Alibaba.com whose listings we had removed; these sites are counterfeit goods and even used the Ridge trademarks to advertise identical-looking wallets. This is on par with some of the most egregious copying we have seen.

64. We also got a General Exclusion Order at the International Trade Commission, where the Commission based its decision in part on the widespread copying we were seeing in the market. Ex. 2009. While it was unfortunate we needed to pursue that relief, it does reflect the extent of the copycats we see on the market. Ex. 2009.

65. Lastly, every day we see new Amazon.com copycats pop up, and we pay an in-house legal team a substantial sum of money each year to keep constant eyes on knockoffs that are always popping up. We have relationships with in-house lawyers at Amazon.com, Shopify, Alibaba.com, Meta/Facebook, TikTok, and others who act as our partners in our enforcement efforts. I see the efforts that go on trying to enforce the '808 Patent on a daily basis, and I know that it keeps two lawyers busy almost full-time and at a substantial expense to the company.

66. In short, there is substantial copying of our product going on, and while Mountain Voyage may be the largest copyist, the proliferation of smaller copycats has us engaging in a constant game of “whack-a-mole.”

e. licensing

67. We have never issued a royalty-bearing license to the ‘808 Patent, though we get requests for such licenses all the time.

68. Despite sellers preferring to pay us a “tax” for infringement of our ‘808 patent, we have been able to execute numerous confidential agreements where we have agreed to release ‘808 Patent infringers’ past damages in exchange for agreements to cease and desist from future infringement. Indeed, we recently filed one of those licenses with the Board under seal in IPR2024-00340 to dismiss that case (as well as our case in Texas against that infringer).

69. I mentioned the 2020 lawsuit with Mosaic previously. That litigation resulted in a similarly structured release agreement.

70. And at present we have about ten (10) other agreements with smaller sellers that have been willing to communicate with us about their infringement of the ‘808 Patent; each such agreement has the format of a release for past damages in exchange for an agreement to cease and desist from future infringement.

71. Each of the licensing agreements I referenced above specifically names the ‘808 Patent, and the ‘808 Patent is the basis for the parties’ agreement to cease and desist.

72. Thus, infringers have routinely agreed not to continue infringing the ‘808 Patent, which I understand is objective evidence of its non-obviousness.

f. unexpected results

73. We have seen drastic improvements in logistics because of the inventions of the '808 Patent. In particular, each plate is now identical (i.e., it does not change based on the money clip design). The wallets can accommodate the cash strap or the money clip. Money clips that break can be easily replaced without needing to replace an entire plate. That allows us to handle returns and warranties much more efficiently, as we can have an on-hand stock of money clips that will fit any wallet that needs service.

74. In addition, the fact that the money clip and the outer plate are separate means that any color outer plate can be paired with any color money clip. We service a warranty claim on a gold wallet the exact same as we do on a carbon fiber wallet, and do not need to maintain separate stocks of gold/money clip plates and carbon fiber/money clip plates. Plus, since the separate money clip plates can replace a plate that either used a money clip or not, the flexibility of our overall warranty business is drastically higher than it used to be.

75. The “unexpected result” we saw as a company was that the inventions of the '808 Patent allow us to streamline our business and permitted the growth we have seen since the launch of the product.

g. industry praise

76. The industry in which we sell wallets is sometimes referred to as “Everyday Carry.” This is an industry where people are interested in how to make

the things they carry everyday—wallets, cash, keys, flashlights, knives, etc.—better and more usable. Much of the “industry” that writes about these kinds of products takes the form of blogs on the Internet that review and discuss various everyday carry items as they launch onto the market.

77. When we launched our new money clip design wallets in 2016, we saw great praise from the industry for the new product, and in particular for the new features that permitted modularity and flexibility. For example, Ex. 2023 is an article from the website thewalletshoppe.com that reviewed the new Ridge wallet around when it came out. That article focused on the benefits of the flexibility provided by the modular money clip design disclosed and claimed in the ‘808 Patent. While the entire article praises the swap-ability of the features, perhaps the best summarization is the statement that “The beauty of these wallets though, is that they’re easy to customize. You can order both a cash strap and money clip and switch between them as you like.” Ex. 2023. This industry praise is directly tied to the features in the ‘808 Patent, and is typically written by EDC aficionados.

78. Similarly, an article from the website <https://hiconsumption.com/style/the-ridge-wallet-review/> touts the benefits of the interchangeability of the cash strap and the money clip (which is enabled by the features in the ‘808 Patent):

Then, there’s the question of whether you’d prefer a cash strap or money clip adorning the outside of your Ridge wallet. Luckily, we got

our hands on both. The cash strap is quite nice for its elasticity and, by extension, an expandable capacity and the addition of small grippy bumps on the underside adds a bit of security to the thing. We did find, though, that the cash can still slide a bit and will potentially begin to come loose as time goes on. Thankfully, as we mentioned, it can be replaced when it gets worn and stretched out. The money clip is notably more secure, but is also a little stiff and juts out from the wallet – which worries us about getting it either caught on our favorite jeans or that it might eventually wear through the fabric of our pants. But, that’s the trade off: the cash strap is slimmer, and the money clip is more secure – you’ll have to choose which is more important to you.

Ex. 2024 at 7. And in this article, you can actually see the features of the wallets just as they are described in the ‘808 Patent:



Ex. 2024 at 4.

79. I also asked our Customer Experience (“CX”) team to look at reviews for the money clip variant of the wallet since its launch. They pulled a set of reviews (Ex. 2027) beginning in 2017 where consumers are praising the usability and

flexibility permitted by the money clip in particular. For example, one user said “Purchased OD green wallet for myself, desert tan wallet as a gift for my son! Wallet holds all my cards securely, cash clip works great too with just the right amount of tension. I really like how the wallet is serviceable. The ability to replace the elastic and add or remove money clip makes for a versatile wallet that will last a long time! And did I mention it’s classy looks? I’m very happy with the wallet and would definitely recommend buying one (or two or three!). My only suggestion would be options to customize the money clip with Military branch emblems or maybe American flag with thin blue line or thin red line? Thanks again for a great wallet!” Ex. 2027 at 10.

80. Another said “The cash clip is more flexible than I thought. I had the cash strap, which was good also, but I wanted to try the cash clip just to see if it was better to put money under it, or was the cash strap easier. After getting use to it, the cash strap and clip are just about the same. I also thought the clip might cause problems when it was in my pocket because the end of it curves up, but I have had no problems getting it out of my pocket. I like the clip very much.” Ex. 2027 at

81. And one user directly compared his 2024 wallet that practices the ‘808 Patent to the 2014 wallet he bought (without the modular money clip): “After 10 years my money clip finally snapped. I notice that the clip has been improved!” Ex. 2027 at 17.

82. These are just a few excerpts from more than 185 independent instances where users (1) decided to leave feedback and (2) left favorable feedback about the money clip. For e-commerce companies like Ridge, this kind of “industry praise” is the best we can hope for, and what we strive for on a daily basis.

83. I declare that all statements made of my own knowledge are true and that all statements made on information and belief are believed to be true, and that these statements were made with the knowledge that willful false statements and the like are punishable by fine or imprisonment, or both, under section 1001 of Title 18 of the United States Code.

Respectfully Submitted,

/s/ Daniel R. Kane

Daniel R. Kane

January 31, 2025