

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

**JOINT MOTION TO TERMINATE INTER PARTES REVIEW OF
U.S. PATENT NO. 10,791,808
UNDER 35 U.S.C. § 317(a) AND 37 C.F.R. § 42.71(a)**

PATENT OWNER'S EXHIBIT LIST

Exhibit No.	Description
Ex. 2001	Defendant 2985 LLC's Motion for Stay in View of Inter Partes Review Petitions in Case No. 23-cv-00407
Ex. 2002	Final Initial Determination in ITC Investigation No. 337-TA-1355 dated March 15, 2024 (Public Version)
Ex. 2003	Declaration of Daniel Kane in ITC Investigation No. 337-TA-1355 dated September 25, 2023 (Redacted)
Ex. 2004	Mountain Voyage Final Invalidity Contentions in District of Colorado Case No. 23-cv-00407, dated June 11, 2024.
Ex. 2005	U.S. Patent No. 5,038,985 to Chapin
Ex. 2006	U.S. Patent No. 7,334,616 to Kaminski
Ex. 2007	Non-Confidential Excerpts from Plaintiff The Ridge Wallet LLC's Responses and Objections to Defendant 2985, LLC d/b/a Mountain Voyage Company LLC's First Set of Interrogatories dated January 19, 2024
Ex. 2008	A 28-year-old sold over \$5 million worth of wallets on Amazon in the last 12 months. He shares the first steps he took and how he went from breaking even to profiting over \$100,000 per month. Kathleen Elkins, Business Insider, Mar 9, 2023.
Ex. 2009	General Exclusion Order in International Trade Commission Investigation No. 337-TA-1355.
Ex. 2010	RESERVED
Ex. 2011	U.S. Patent Publication No. 2016/0324283 to Daniel Kane, published November 10, 2016
Ex. 2012	Website printout from https://www.youtube.com/watch?v=iTLzs-jNFJ8 , captured January 14, 2025
Ex. 2013	Revenue summary document for Ridge Wallet sales, by year, from 2014 to 2024
Ex. 2014	Website printout of https://ridge.com/collections/wallets Captured January 14, 2025
Ex. 2015	List of Entities submitted to United States Customs and Border Patrol in Connection with General Exclusion Order (Ex. 2009)

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Ex. 2016	Photographs of counterfeit product produced by Shenzhen X-World Technology Co., Ltd.
Ex. 2017	Website printout of https://ridge.com/products/burnt-damascus Captured January 14, 2025
Ex. 2018	Website printouts of exemplary Alibaba.com listings for counterfeit Ridge wallets.
Ex. 2019	Non-Confidential Excerpts from Sworn Witness Statement of Thomas Kurfess, PHD, P.E. in 337-TA-1355
Ex. 2020	Declaration of Daniel R. Kane
Ex. 2021	Declaration of Thomas R. Kurfess, PH.D., P.E.
Ex. 2022	Preliminary Injunction Order against Shenzhen X-World Technology Co., Ltd. in Case No. 24-cv-03569 in the Northern District of Illinois, dated September 3, 2024
Ex. 2023	Ridge Wallet Cash Strap Or Money Clip – Which Is Right For You? source: https://thewalletshoppe.com/ridge-wallet-cash-strap-or-money-clip/
Ex. 2024	Review: Ridge’s RFID-Secured Metal Wallets Are Virtually Indestructible; dated August 29, 2017; source: https://hiconsumption.com/style/the-ridge-wallet-review/
Ex. 2025	Exemplary Photograph of Ridge orange wallet
Ex. 2026	Exemplary Photograph of Mountain Voyage orange wallet
Ex. 2027	Ridge Customer Experience (“CX”) sourced reviews for money clip wallet product
Ex. 2028	Curriculum Vitae for Thomas R. Kurfess, PH.D., P.E.
Ex. 2029	CONFIDENTIAL Settlement Agreement (Restricted Access)

Pursuant to 35 U.S.C. § 317(a) and 37 C.F.R. § 42.71(a), Petitioner 2985, LLC d/b/a Mountain Voyage Company LLC (“Petitioner”) and Patent Owner The Ridge Wallet LLC (“Patent Owner”) hereby jointly request termination of the *Inter Partes* Review of U.S. Patent No. 10,791,808 in IPR2024-00692.

Petitioner and Patent Owner have entered into a written confidential settlement agreement that fully resolves this matter. The parties are concurrently filing a copy of the settlement agreement as Exhibit 2029 along with a request to treat it as confidential business information pursuant to 35 U.S.C. § 317(b) and 35 C.F.R. § 42.74(c).

The undersigned represents that there are no other agreements, oral or written, between the parties made in connection with, or in contemplation of, the termination of the present proceeding, and that Exhibit 2029 represents a true and accurate copy of the agreement between the parties that resolves the present proceeding.

On February 28, 2025, the Parties informed the Board of their confidential agreement via e-mail and requested authorization to file a joint motion to terminate the *inter partes* review with respect to both parties. As set forth in an e-mail dated March 5, 2025, the Board authorized the filing of the requested joint motion to terminate this proceeding as to both parties.

Accordingly, Petitioner and Patent Owner jointly request termination of the present proceeding.

Public policy favors terminating the present inter partes review proceeding. Congress and federal courts have expressed a strong interest in encouraging settlement in litigation. *See, e.g., Delta Air Lines, Inc. v. August*, 450 U.S. 346, 352 (1981) (“The purpose of [Fed. R. Civ. P.] 68 is to encourage the settlement of litigation.”); *Bergh v. Dept. of Transp.*, 794 F.2d 1575, 1577 (Fed. Cir. 1986) (“The law favors settlement of cases.”), *cert. denied*, 479 U.S. 950 (1986).

The Federal Circuit places a particularly strong emphasis on settlement. *See Cheyenne River Sioux Tribe v. U.S.*, 806 F.2d 1046, 1050 (Fed. Cir. 1986) (noting that the law favors settlement to reduce antagonism and hostility between parties). And, the Board’s Trial Practice Guide stresses that “[t]here are strong public policy reasons to favor settlement between the parties to a proceeding.” Office Patent Trial Practice Guide, 84 FR 64280, p. 86 (November, 2019).

Terminating this *inter partes* review promotes the congressional goal of establishing a more efficient patent system by limiting unnecessary and counterproductive costs. *See Changes to Implement Inter Partes Review Proceedings, Post-Grant Review Proceedings, and Transitional Program for Covered Business Method Patents*, 77 Fed. Reg. 48,680 (Aug. 14, 2012).

Permitting termination as to all parties provides certainty and fosters an environment that promotes settlements, creating a timely, cost-effective alternative to litigation.

Additionally, termination of this IPR is appropriate as the Board has not yet “decided the merits of the proceeding.” *See, e.g.*, Office Patent Trial Practice Guide, 84 FR 64280, p. 86 (November, 2019). Petitioner filed its Petition on March 15, 2024 (Paper 1). The Board instituted review on October 1, 2024 (Paper 18). Patent Owner filed its response to the Petition on January 31, 2025 (Paper 25).

The parties have now settled their dispute, and have reached agreement to terminate this proceeding. The USPTO can conserve its resources through terminating the proceeding now, removing the need for the Board to further consider the arguments or to render a Final Decision.

Furthermore, no other party’s rights will be prejudiced by the termination of this proceeding, including, but not limited to, proceedings in the U.S. Patent and Trademark Office involving U.S. Patent No. 10,791,808. There are presently no other pending *Inter Partes* Review proceedings with respect to U.S. Patent No. 10,791,808, or to any of its family members.

For the above reasons, Patent Owner and Petitioner respectfully request

termination of this Inter Partes Review of U.S. Patent 10,791,808.

Date: March 5, 2025

Respectfully Submitted,

/s/ Benjamin E. Weed
Benjamin E. Weed
Reg. No. 65,939
Gina A. Johnson (Admitted *pro hac vice*)
104 Main Street, Suite 2C
Park Ridge, Illinois 60068
Telephone: (708) 303-8872
Email: ben@ridge.com; gina@ridge.com

ATTORNEYS FOR PATENT OWNER

/s/ Jacob M. Busch
Jacob M. Busch
Registration No.: 70,830
Email: jake@mountainvoyageco.com
Mountain Voyage Co. LLC
3513 Patterson Cir.
Richfield, OH 44286
Telephone: (330)241-1800

Igor D. Ozeruga
Registration No.: 72,399
Email: iozeruga@tarolli.com
Tarolli, Sundheim, Covell &
Tummino LLP
950 Main Ave Suite 710
Cleveland, OH 44113
Telephone: (216)452-6822

ATTORNEYS FOR PETITIONER

CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e), the undersigned certifies that on March 5, 2025, a complete and entire copy of this JOINT MOTION TO TERMINATE was provided, via email, to the Petitioner by serving the correspondence address of record as follows:

Jacob Busch

jake@mountainvoyageco.com

Igor Ozeruga

iozeruga@tarolli.com

/Benjamin E. Weed /

Benjamin E. Weed

Reg. No. 65,939

The Ridge Wallet LLC

104 Main St., Suite 2C

Park Ridge, IL 60068

ben@ridge.com