

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

TETHRD, LLC,	)	
	)	
PLAINTIFF,	)	Civil Action No. 1:24-cv-00076
	)	Chief Judge Campbell
v.	)	Magistrate Judge Holmes
	)	
CRÜZR SADDLES LLC,	)	JURY DEMAND
	)	
DEFENDANT.	)	
	)	

PLAINTIFF TETHRD, LLC’S INITIAL INFRINGEMENT CONTENTIONS

Pursuant to the Initial Case Management Order entered into on January 28, 2025 (Docket No. 46) and the First Modified Case Management Order entered into on February 10, 2025 (Docket No. 49), Plaintiff Tethrd, LLC (“Plaintiff” or “Tethrd”) hereby: (1) provides its initial infringement contentions, including an exemplary chart (attached as Exhibit A) setting forth where in the accused products each element of the asserted claims are found; (2) identifies the priority date (*i.e.*, the earliest currently known date of invention) for each asserted claim; and (3) identifies the basis for its willful patent infringement allegations. Upon entry of an applicable protective order, Tethrd shall supplement its initial infringement contentions with an accompanying production that includes documents evidencing conception and reduction to practice for each claimed invention.

I. Disclosure of Preliminary Infringement Contentions

There is one patent-in-suit: U.S. Patent No. 11,964,175 (the “175 Patent”). The Accused Products are Defendant Cruzr Saddles LLC’s (“Defendant” or “Cruzr”) hunting saddles that infringe at least one claim of the 175 Patent, either literally or under the doctrine of equivalents, in violation of 35 U.S.C. § 271(a). Below is a chart identifying each claim of the 175 Patent that is infringed by each Accused Product.

Accused Product¹	Asserted Claims of U.S. Patent No. 11,964,175
Cruzr XC Hunting Saddle	1-6, 11
Cruzr Archon	1-6, 11
Cruzr S Hunting Saddle	1-6, 11
Adjustable AmSteel-Blue Bridge	1-6, 11

CRUZR XC HUNTING SADDLE, <https://cruzr.com/product/cruzr-xc-hunting-saddle/> (last visited March 4, 2025); CRUZR ARCHON, <https://cruzr.com/product/cruzr-archon/> (last visited March 4, 2025); CRUZR S HUNTING SADDLE, <https://cruzr.com/product/cruzr-s-hunting-saddle/> (last visited March 4, 2025); ADJUSTABLE AMSTEEL-BLUE BRIDGE (BLACK), <https://cruzr.com/product/adjustable-amsteel-bridge/> (last visited March 4, 2025) (collectively, the “Accused Products”).

All of Defendant’s Accused Products directly infringe the 175 Patent. Defendant directly infringes the claims of the 175 Patent by making, using, selling, offering for sale, and/or importing the Accused Products in the United States and this judicial district without authority. The Accused Products meet every limitation of each asserted claim, either literally or under the doctrine of equivalents. Attached as Exhibit A is a preliminary infringement contention chart identifying specifically where each limitation of each asserted claim of the 175 Patent is found within the Cruzr XC Hunting Saddle.² Tethrd also describes Defendant’s infringement in its First Amended and Supplemental Complaint (Docket No. 36), which is incorporated by reference in its entirety.

¹ Tethrd reserves the right to supplement this list if Cruzr introduces new saddles that infringe the 175 Patent.

² The Cruzr XC Hunting Saddle chart is representative of all Accused Products because each Accused Product features the same Adjustable AmSteel-Blue Bridge. Tethrd reserves the right to

Pursuant to the Initial Case Management Order and First Modified Case Management Order, these infringement contentions are preliminary. These disclosures, including Exhibit A, are based on the present state of Tethrd's knowledge, without the benefit of any discovery. Tethrd's investigation is ongoing, and Tethrd reserves all rights to supplement, amend, and/or otherwise modify its infringement contentions.

The Parties have not exchanged claim terms or proposed claim constructions, Defendant has not served its preliminary invalidity contentions and accompanying production, and the *Markman* hearing date is yet to be determined. Tethrd is not required to disclose claim construction positions at this time, and does not. These disclosures, inclusive of Exhibit A, should not be construed as setting forth Tethrd's claim construction positions. To the extent Defendant asserts that a particular Tethrd claim construction position is implied by these disclosures, including Exhibit A, Tethrd denies and objects to any such assertion. Tethrd reserves all rights to modify its claim construction positions.

II. Disclosure of the 175 Patent's Priority Date

The 175 Patent was filed on July 18, 2022 as Application No. 17/867,553 and claims the benefit of Application No. 17/231,717, filed on April 15, 2021, now Patent No. 11,504,556, which is a continuation of Application No. 16/736,345, filed on January 7, 2020. Based on information currently available to Tethrd, the earliest priority date for the 175 Patent is January 7, 2020.

These initial disclosures are based on the present state of Tethrd's knowledge. Tethrd's investigation is ongoing, and Tethrd reserves all rights to modify the positions taken in these initial disclosures.

provide additional, separate preliminary infringement contention charts for the Cruzr Archon, Cruzr S Hunting Saddle, and Adjustable AmSteel-Blue Bridge, should the Court deem necessary.

III. Basis for Willful Patent Infringement Allegations

Defendant's infringement of the 175 Patent has been willful and deliberate because Defendant intentionally made, sold, and continues to sell the Accused Products knowing that it includes a rope bridge assembly that infringes the 175 Patent. Defendant has been on notice since as early as June 3, 2024 that it sold products that infringe at least one claim of the 175 Patent.

Specifically, Tethrd provided Defendant notice of Claim 1 of U.S. Patent Application No. 16/736,345 (the "345 Application") by letter dated July 23, 2020 (the "2020 Letter"). The 2020 Letter informed Defendant that its Adjustable AmSteel-Blue Bridge infringes at least one claim of the 345 Application, to which the 175 Patent claims the benefit of priority.

Tethrd then provided Defendant notice of U.S. Patent No. 11,504,556 B2 (the "556 Patent") by letter dated September 5, 2023 (the "2023 Letter"). The 2023 Letter informed Defendant that its Cruzr XC Hunting Saddle and Cruzr Archon Saddle both infringe at least one claim of the 556 Patent, to which the 175 Patent claims the benefit of priority.

Finally, Tethrd provided Defendant notice of the 175 Patent by letter dated June 3, 2024 (the "2024 Letter"). The 2024 Letter informed Defendant that its Cruzr XC Hunting Saddle, Cruzr Archon Saddle, and Adjustable AmSteel – Blue Bridge infringe at least one claim of the 175 Patent. The 2024 Letter also included preliminary claim charts for each of the Accused Products.

Defendant continues to make, use, sell, offer for sale, and/or import the Accused Products in the United States and this judicial district without authority. Defendant's infringement of the 175 Patent has been willful and deliberate.

IV. Disclosure of Accompanying Production

Tethrd directs Cruzr to Tethrd_000001 – Tethrd_000434 from Tethrd's February 21, 2025 document production, which are copies of the file histories for the 175 Patent and related

applications and which evidence ownership of the 175 Patent rights by Tethrd. Tethrd represents that it does not have any documents concerning any disclosure, sale or transfer, or offer to sell or transfer the claimed invention prior to the bar date under 35 U.S.C. § 102(b) and/or the date of the invention for the 175 Patent.

Upon entry of an applicable protective order, Tethrd shall supplement its initial infringement contentions with an accompanying document production that includes documents evidencing the conception and first reduction to practice of each claimed invention on or before the date of the application for the 175 Patent.

In producing the accompanying documents, Tethrd does not admit or concede the relevancy, materiality, authenticity, or admissibility as evidence of any of these documents. All objections to the use, at trial or otherwise, of any document produced are hereby expressly reserved, and Tethrd objects to the production of any documents protected by the attorney-client privilege, the work-product doctrine, or any other immunities from discovery.

Tethrd makes these disclosures without the benefit of discovery. Further, Tethrd's investigation is ongoing. Tethrd produces these documents without prejudice to its right to produce additional documents after considering documents obtained and reviewed throughout discovery and further investigation.

Date: March 10, 2025

Respectfully submitted,

By: /s/ Daniel Huynh

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Georgia Bar No. 987369

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EXHIBIT A

U.S. Patent No. 11,964,175 B2	Cruzr XC Hunting Saddle
Claim 1	
<p>1. A bridge rope assembly configured to couple together a tree rope to a first bridge loop and a second bridge loop on a harness, the bridge rope assembly including:</p>	 <p>https://cruzr.com/product/cruzr-xc-hunting-saddle/</p>



<https://cruZR.com/product/cruZR-xc-hunting-saddle/>

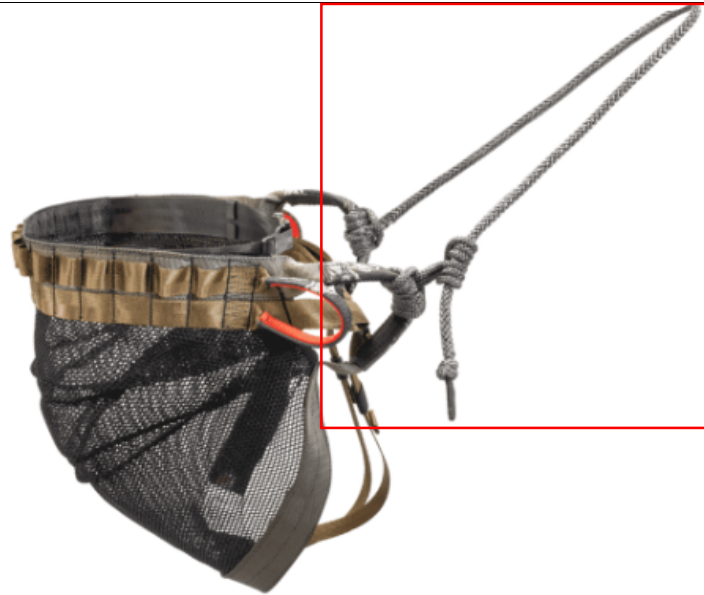


<https://cruZR.com/product/cruZR-xc-hunting-saddle/>



<https://www.youtube.com/watch?v=vwVQILVB24Q> at 1:25

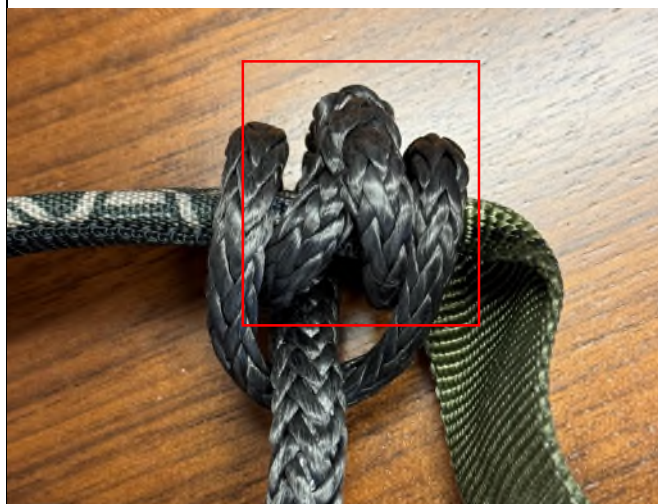
a main body comprising a rope having
a first end and a second end,

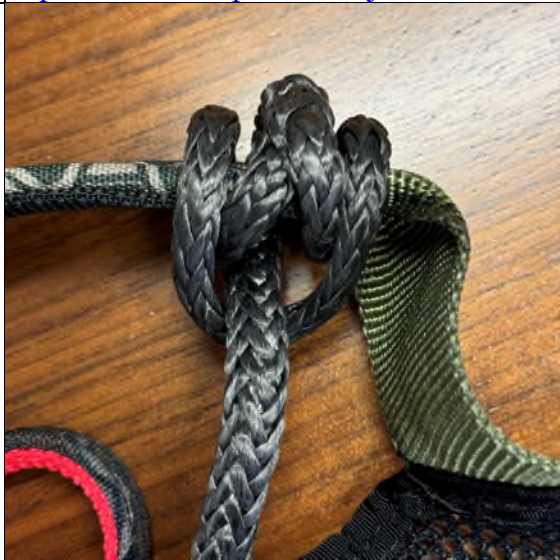


<https://cruzr.com/product/cruzr-xc-hunting-saddle/>

the main body having a splice therein
to form an eye loop in the main body,

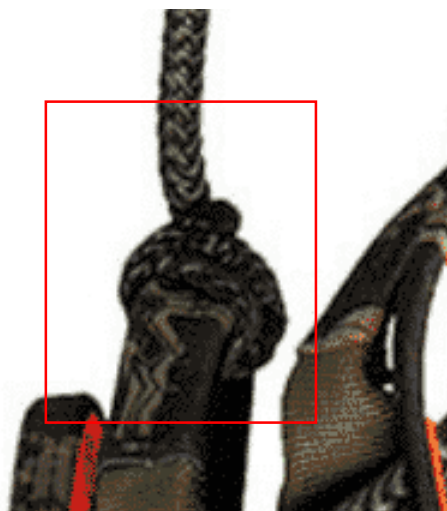




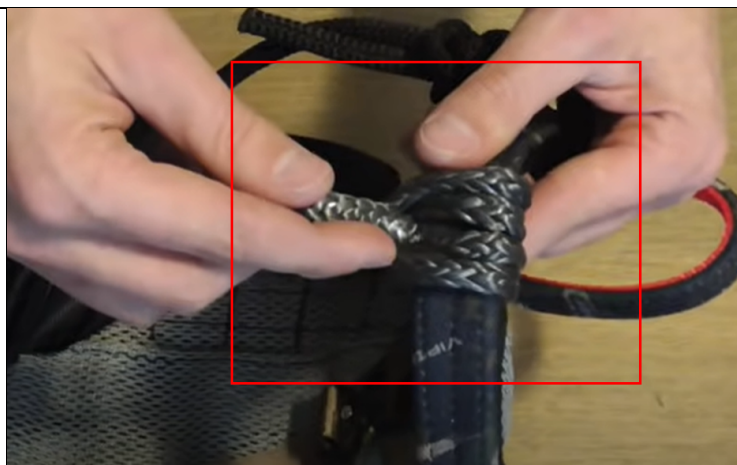
	<p>Take your hunting saddle setup to the <u>next level with our adjustable</u> AmSteel®-Blue bridge (in black fibers) that features a <u>spliced eye on one end</u> and a spliced-in stopper knot on the other. The saddle bridge attaches to the bridge loops by forming a Prusik knot on one side and feeds through a continuous loop of 5/32 Amsteel formed into a Prusik on the other bridge loop.</p> <p>The bridge gives you 34 inches of adjustment and the Prusiks, which are attached to the bridge loops, give you the ability to adjust the pressure from the bottom of the saddle to the top.</p> <p>The loops when loaded will not move, making it ideal to dial in your preferred settings.</p> <p>Includes:</p> <ul style="list-style-type: none"> • <u>Main bridge cord with spliced eye</u> and stopper knot • Spliced continuous loop <p>Proudly Made in the USA</p> <p>https://cruZR.com/product/adjustable-amsteel-bridge/</p>	
<p>the eye loop being configured to engage the first bridge loop,</p>		



<https://cruZR.com/product/cruZR-xc-hunting-saddle/>



<https://cruZR.com/product/cruZR-xc-hunting-saddle/>



<https://www.youtube.com/watch?v=vwVQILVB24Q> at 12:12

the main body comprising a first portion including the first end and a second portion including the second end, the first portion extending through the second portion of the main body such that the first end is positioned within the second portion adjacent to the second end; and



<https://cruZR.com/product/cruZR-xc-hunting-saddle/>



<https://cruZR.com/product/cruZR-xc-hunting-saddle/>



<https://www.youtube.com/watch?v=vwVQILVB24Q> at 1:25

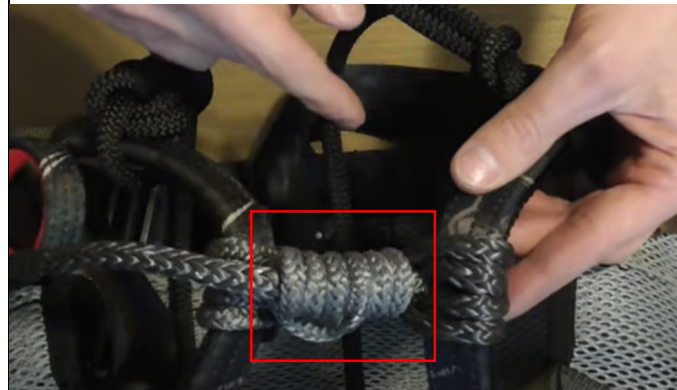
a friction hitch being positioned on the main body between the second end and the eye loop,



<https://cruzt.com/product/cruzt-xc-hunting-saddle/>

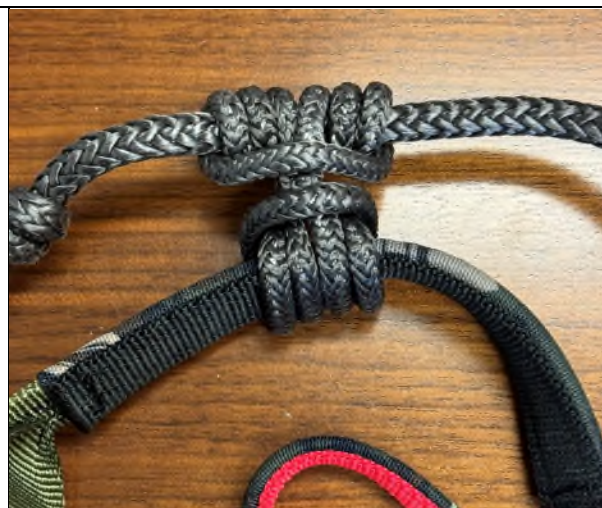
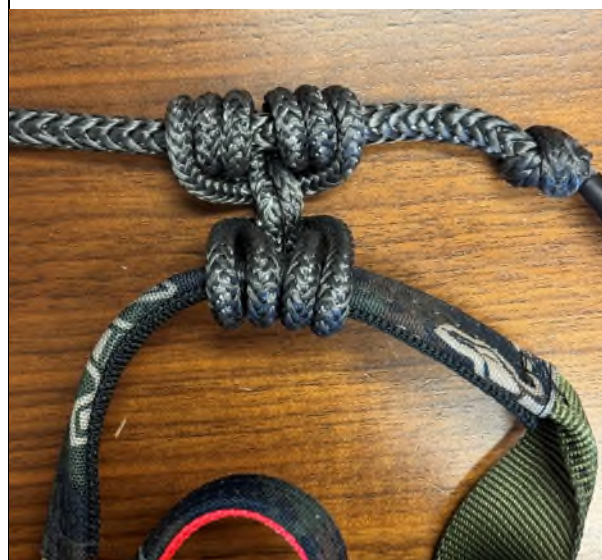


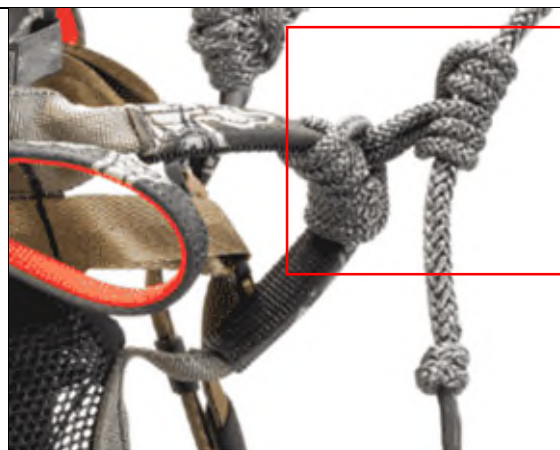
<https://cruzt.com/product/cruzt-xc-hunting-saddle/>



<https://www.youtube.com/watch?v=vwVQILVB24Q> at 12:36

the friction hitch being configured to engage the second bridge loop,

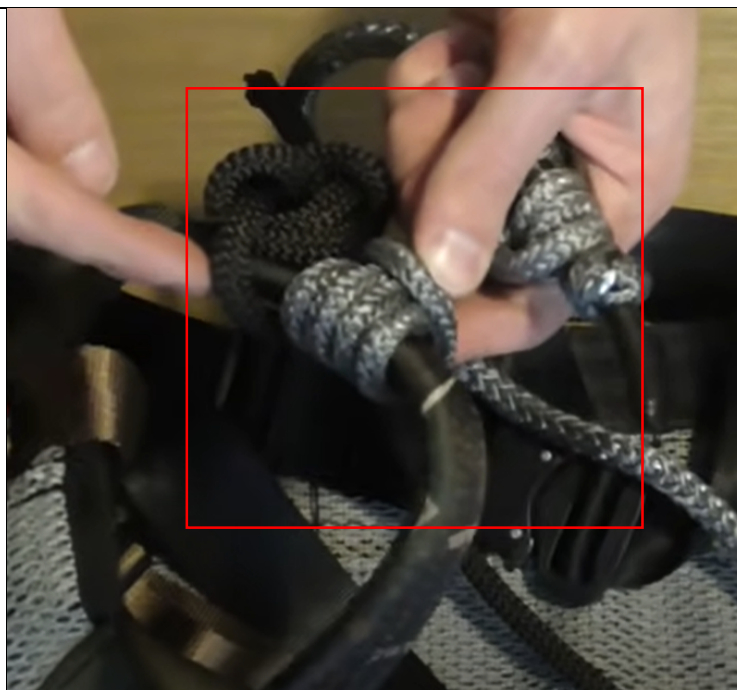




<https://cruZR.com/product/cruZR-xc-hunting-saddle/>



<https://cruZR.com/product/cruZR-xc-hunting-saddle/>



<https://www.youtube.com/watch?v=vwVQILVB24Q> at 13:06

the friction hitch comprising a closed loop.





Take your hunting saddle setup to the next level with our adjustable AmSteel®-Blue bridge (in black fibers) that features a spliced eye on one end and a spliced-in stopper knot on the other. The saddle bridge attaches to the bridge loops by forming a Prusik knot on one side and feeds through a continuous loop of 5/32 Amsteel formed into a Prusik on the other bridge loop.

The bridge gives you 34 inches of adjustment and the Prusiks, which are attached to the bridge loops, give you the ability to adjust the pressure from the bottom of the saddle to the top.

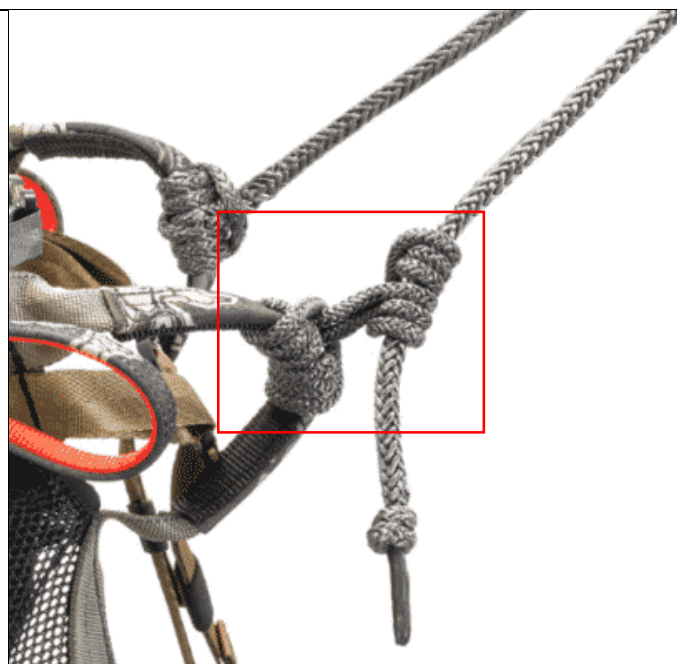
The loops when loaded will not move, making it ideal to dial in your preferred settings.

Includes:

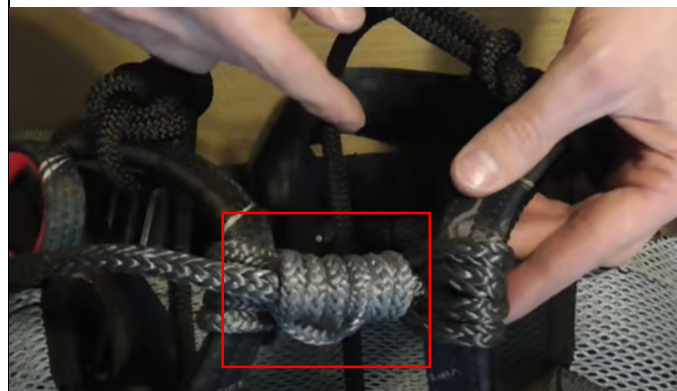
- Main bridge cord with spliced eye and stopper knot
- Spliced continuous loop

Proudly Made in the USA

<https://cruZR.com/product/adjustable-amsteel-bridge/>



<https://cruZR.com/product/cruZR-xc-hunting-saddle/>



<https://www.youtube.com/watch?v=vwVQILVB24Q> at 12:36

Claim 2

The bridge rope assembly according to claim 1, wherein the rope has a length from the first end to the second end between 72.0 inches and 126.0 inches.



Claim 3

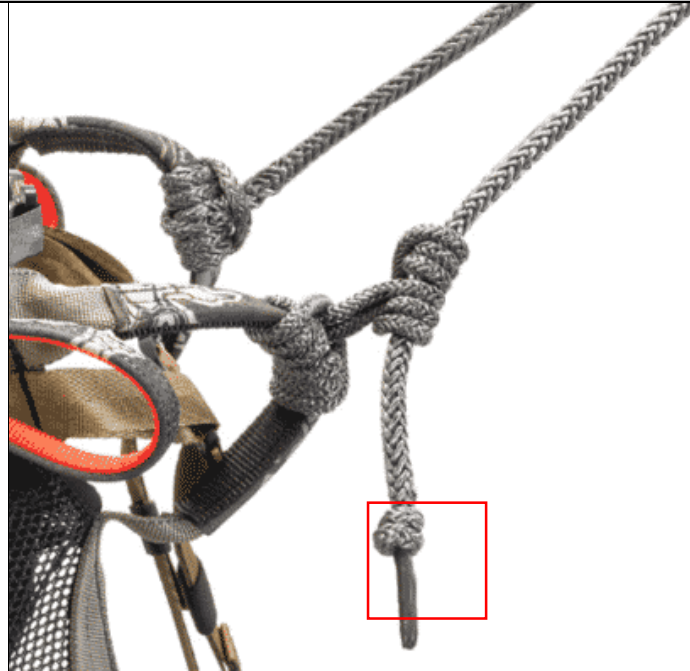
The bridge rope assembly according to claim 1, wherein a distance of the eye loop to the second end is between 24.0 inches and 40.0 inches.





Claim 4

The bridge rope assembly according to claim 3, wherein the main body includes a stop knot in the second portion adjacent to the second end.



<https://cruZR.com/product/cruZR-xc-hunting-saddle/>

Take your hunting saddle setup to the next level with our adjustable AmSteel®-Blue bridge (in black fibers) that features a spliced eye on one end and a **spliced-in stopper knot** on the other. The saddle bridge attaches to the bridge loops by forming a Prusik knot on one side and feeds through a continuous loop of 5/32 Amsteel formed into a Prusik on the other bridge loop.

The bridge gives you 34 inches of adjustment and the Prusiks, which are attached to the bridge loops, give you the ability to adjust the pressure from the bottom of the saddle to the top.

The loops when loaded will not move, making it ideal to dial in your preferred settings.

Includes:

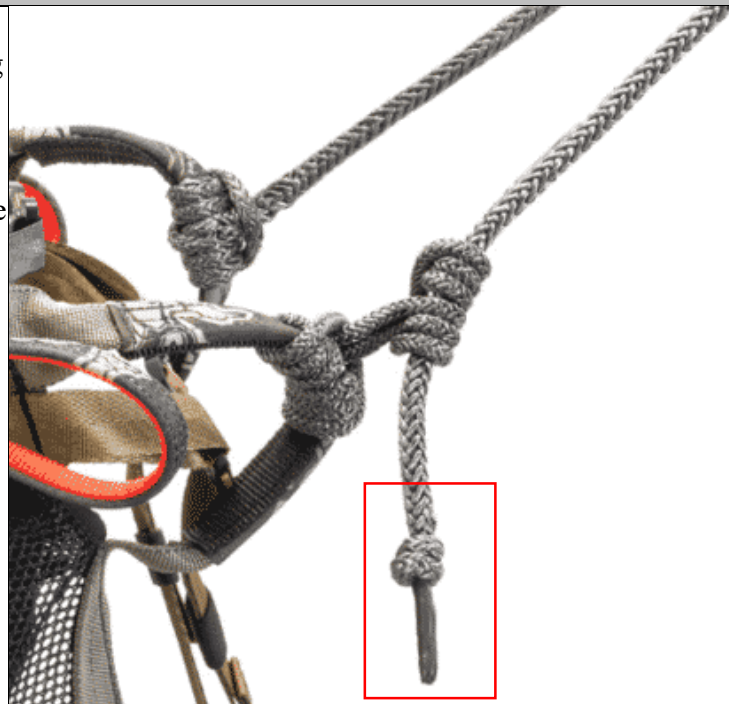
- Main bridge cord with spliced eye and **stopper knot**
- Spliced continuous loop

Proudly Made in the USA

<https://cruZR.com/product/adjustable-amsteel-bridge/>

Claim 5

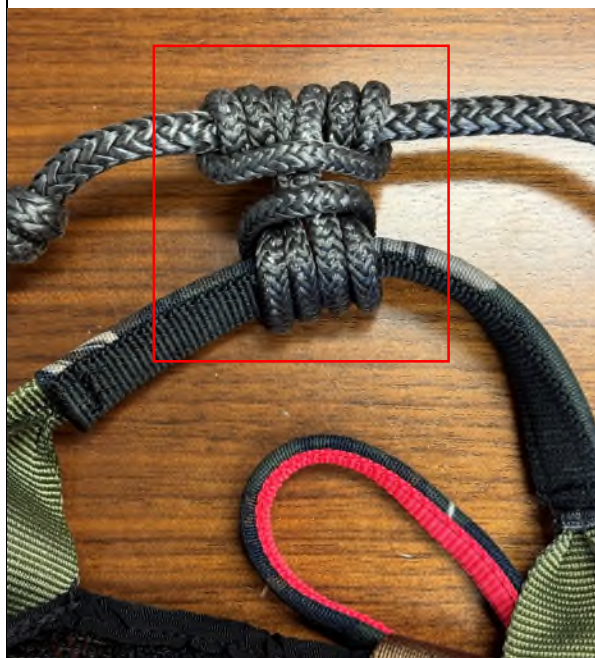
The bridge rope assembly according to claim 4, further including a securing member being positioned on the main body at a juncture of the first and second ends to retain the first and second ends at a static position relative to each other.



<https://cruzt.com/product/cruzt-xc-hunting-saddle/>

Claim 6

The bridge rope assembly according to claim 4, wherein the closed loop comprises a single rope being formed into the closed loop.





Take your hunting saddle setup to the next level with our adjustable AmSteel®-Blue bridge (in black fibers) that features a spliced eye on one end and a spliced-in stopper knot on the other. The saddle bridge attaches to the bridge loops by forming a Prusik knot on one side and feeds through a continuous loop of 5/32 Amsteel formed into a Prusik on the other bridge loop.

The bridge gives you 34 inches of adjustment and the Prusiks, which are attached to the bridge loops, give you the ability to adjust the pressure from the bottom of the saddle to the top.

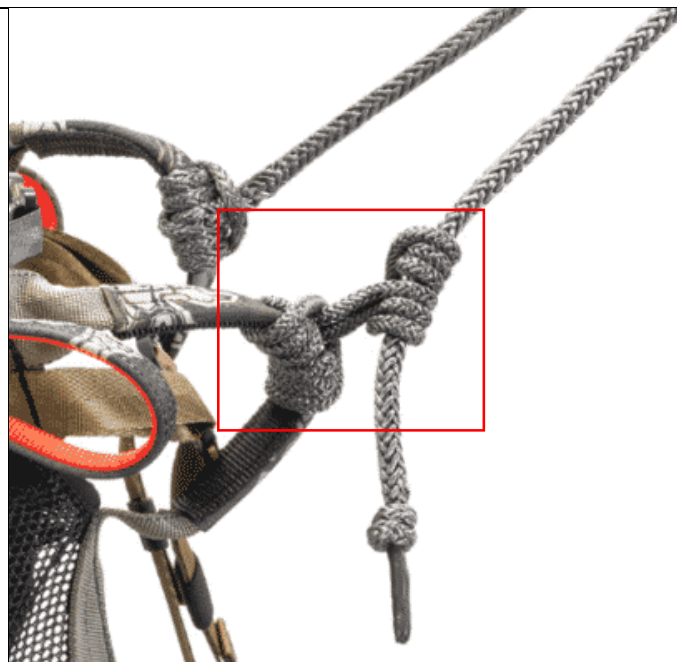
The loops when loaded will not move, making it ideal to dial in your preferred settings.

Includes:

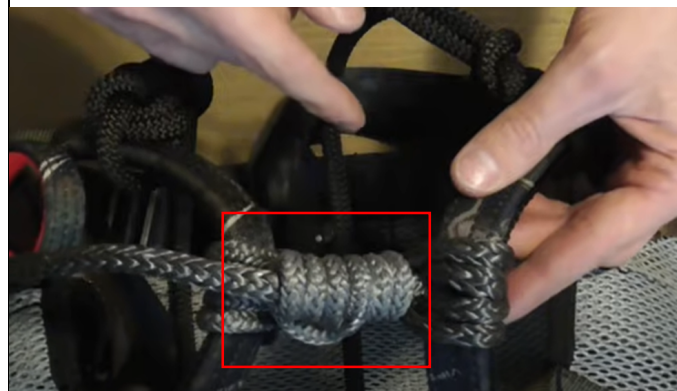
- Main bridge cord with spliced eye and stopper knot
- Spliced continuous loop

Proudly Made in the USA

<https://cruZR.com/product/adjustable-amsteel-bridge/>



<https://cruZR.com/product/cruZR-xc-hunting-saddle/>



<https://www.youtube.com/watch?v=vwVQILVB24Q> at 12:36

Claim 11

The bridge rope assembly according to claim 1, wherein the main body is comprised of UHMWPE.

Key Features:

- **Xpansion Chamber™**: Adds next-level comfort for long hours in the field.
- **Adjustable AmSteel®-Blue Bridge**: Durable, adjustable, and built to last.
- **Molle Loops**: Two rows of molle loops for easy gear attachment.
- **Quick-Release Buckles**: Easy to get in and out of, even in the dark.

<https://cruZR.com/product/cruZR-xc-hunting-saddle/>

Take your hunting saddle setup to the next level with our adjustable **AmSteel®-Blue bridge** (in black fibers) that features a spliced eye on one end and a spliced-in stopper knot on the other. The saddle bridge attaches to the bridge loops by forming a Prusik knot on one side and feeds through a continuous loop of **5/32 Amsteel** formed into a Prusik on the other bridge loop.

<https://cruZR.com/product/adjustable-amsteel-bridge/>

Samson Cordage is the premier manufacturer of **Amsteel high performance UHMWPE (Ultra High Molecular Weight Polyethylene) rope**. Made in a braided 12 strand configuration, it won't rotate under heavy loads and being low-stretch limits recoil making it safer than other fiber ropes.

<https://www.arcticwirerope.com/awr-product/1-1-4-samson-amsteel-blue-rope-2-ea-x-8200-reels-special-price/>

Samson Premium Amsteel Blue Rope 1/8"
Multiple Colors, Multiple Lengths, Strong
Dyneema Fiber 2,300lb tensile Strength, Torque
Free, Low Stretch, 12 Strand, Easy to Splice
(1/8" x 50', Black)

Product information

Material

Ultra-High Molecular Weight Polyethylene

Color

Black

<https://www.amazon.com/CBKnot-Premium-Amsteel-Dyneema-Strength/dp/B0B8WJKBXB?th=1>