

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

TETHRD, LLC,	)	
	)	
Plaintiff/Counterdefendant,	)	Civil Action No. 1:24-cv-00076
	)	Chief Judge Campbell
v.	)	Magistrate Judge Holmes
	)	
CRÜZR SADDLES LLC,	)	JURY DEMAND
	)	
Defendant/Counterclaimant.	)	
	)	

**DEFENDANT/COUNTERCLAIMANT CRÜZR SADDLES LLC'S
INITIAL INVALIDITY AND UNENFORCEABILITY CONTENTIONS**

Pursuant to the Initial Case Management Order (“ICMO”) (Dkt. No. 46), the First Modified Case Management Order (Dkt. No. 49), the Second Modified Case Management Order (Dkt. No. 52), and the Third Modified Case Management Order (Dkt. No. 56), Defendant/Counterclaimant Crüzr Saddles LLC (“Defendant”) provides its Initial Invalidity and Unenforceability Contentions for the asserted claims of United States Patent No. 11,964,175 (“the ’175 Patent”). In particular, Plaintiff/Counterdefendant Tethrd, LLC (“Plaintiff”) has asserted Claim 1-6 and 11 of the ’175 Patent. *See* Plaintiff Tethrd, LLC’s Initial Infringement Contentions at 1-2 & Ex. A. Accordingly, these Initial Invalidity and Unenforceability Contentions only address the seven (7) patent claims asserted by Plaintiff.¹

These Initial Invalidity and Unenforceability Contentions are based on information currently available to Defendant. Defendant’s investigation of Plaintiff Tethrd LLC’s (“Plaintiff’s”) allegations is in the early stages, and no construction of claim terms or substantive discovery in this

¹ All of the unasserted claims of the ’175 Patent are also invalid, namely, Claims 7-10 and 12-14. Defendant reserves the right to amend these Initial Invalidity and Unenforceability Contentions in the event that Plaintiff asserts any of these other claims.

action has occurred. Defendant therefore reserves the right to amend and/or supplement these Initial Invalidity and Unenforceability Contentions. Thus, nothing herein shall be construed as a waiver of Defendant's right to seek more detailed invalidity and unenforceability contentions, or a waiver of any claims or defenses in this case.

Prior art not included in these contentions, whether or not now known to Defendant, may become relevant depending on positions that Plaintiff asserts and the claim constructions that the Court may determine. Defendant's ongoing investigations also may uncover additional prior art. Defendant reserve its right to modify these contentions, including without limitation, by adding or withdrawing prior art to or from these contentions and/or modifying the claim charts herein.

The obviousness combinations of prior art stated in these contentions are merely exemplary and are not intended to be exhaustive. Additional obviousness combinations of the prior art identified herein are possible and readily available, and Defendant reserves its right to use such additional combinations in this action. In particular, Defendant is not now aware to what extent, if any, Plaintiff will contend that limitations in the asserted claims are not taught or suggested by the prior art identified as anticipatory and/or will contend that material not expressly disclosed in the prior art would not have been known to a person of ordinary skill in the art, or that a combination of prior art items may not have been obvious to such a person. To the extent that such issues arise, Defendant reserves the right to identify and rely on other aspects of prior art identified in these contentions and/or on additional prior art that Defendant may identify.

In addition to the anticipation and obviousness grounds illustrated in the claim charts below, Defendant contends that the '175 Patent is also unenforceable, and provides exemplary reasons stated below in these contentions.

The prior art items on which the invalidity contentions herein rely at this time are identified in Sections I-III below. The following prior art relate to the invalidity of the asserted claims of the '175 Patent and the unenforceability of the '175 Patent. Each of the following may qualify as prior art as their date of publication, date of public use, and/or date of sale, including their date of posting on popular public forums on the Internet. Defendant reserves the right to further elaborate on the priority dates for the below listed references as discovery continues.

I. Invalidity Contentions – Anticipation and Obviousness

Defendant contends that the asserted claims of the '175 Patent are invalid because, *inter alia*, the prior art anticipates and renders the claims obvious.

For example, using the '175 Patent's earliest possible priority date (*viz.*, Jan. 7, 2020), the claim chart below demonstrates how the asserted claims are rendered obvious in view of the following selected and non-exhaustive prior art references:

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:	YouTube – Mantis Saddle - Setup and Directions 
a main body comprising a rope having a first end and a second end, the main body having a splice therein to form an eye loop in the main body, the eye loop being configured to engage the first bridge loop, the main body	AboristSite – Amsteel Blue Splicing Experiments Side-by-Side Splice “In splicing short Eye and Eye slings, it is often necessary to overlap the tapered tail from one eye with the tapered tail from the other. When well done, the result is a nearly uniform rope diameter from one eye to the other. . . . I soon discovered that

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

AmB is roomy enough inside to hold 2 full-diameter ropes side by side!”

Bury-in-Bury Splice

“If the previous splice was a deviation from accepted practice, this one was even more so. Instead of burying 2 cores side by side, in this experiment one core is buried inside of the other.”

“First I made an ordinary eye and left a long tail hanging out of the rope. By inserting the wire fid at the throat of the eye just formed, and running it right down the center of stuffed core, I could bring it out of the tail half an inch beyond where the tail emerged from the *cover*. Then the rope was pulled through to form the second eye. . . . The end result is that for the full distance between the eyes you have a rope in a rope in a rope--3 concentric layers of rope.”

Bridge Test

“A new example of a bury-in-bury sling was made up, this time for testing in a saddle bridge configuration.”

Apr 19, 2008

M moray
ArboristSite Guru

Side-by-Side Splice

In splicing short Eye and Eye slings, it is often necessary to overlap the tapered tail from one eye with the tapered tail from the other. When well done, the result is a nearly uniform rope diameter from one eye to the other. Even though I knew the 9 inches of my saddle bridge was way too short to accommodate 2 legal spliced eyes in 3/16 AmB, I thought I would go through the motions anyway. I soon discovered that AmB is roomy enough inside to hold 2 full-diameter ropes side by side! This is practically impossible with Tenex, and it offered up a new possibility for the short sling.

I made up a double-eye sling in which each buried tail extended the full length of the rope and emerged at the throat of the other eye. The distance between the eyes was about 5.5 inches, much shorter than the prescribed minimum of 8 inches. I went directly to the pull test without bothering to taper and bury the tails. My friend Jack and I hooked it up between two of his trucks and he started pulling while I took photos.

Apr 19, 2008

M moray
ArboristSite Guru

Bury-in-Bury Splice

If the previous splice was a deviation from accepted practice, this one was even more so. Instead of burying 2 cores side by side, in this experiment one core is buried inside of the other.

As always, to make the tests really conservative, the splices are much shorter than manufacturer's spec. First I made an ordinary eye and left a long tail hanging out of the rope. By inserting the wire fid at the throat of the eye just formed, and running it right down the center of stuffed core, I could bring it out of the tail half an inch beyond where the tail emerged from the cover. Then the rope was pulled through to form the second eye. The pictures should make this clearer. The end result is that for the full distance between the eyes you have a rope in a rope in a rope--3 concentric layers of rope. All the strange asymmetries of the previous experiment are gone!

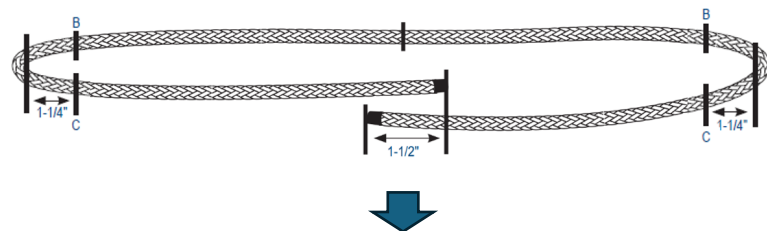
Apr 19, 2008

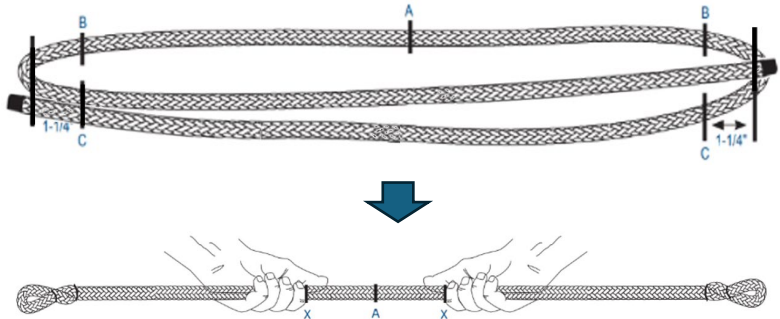
M moray
ArboristSite Guru

Bridge Test

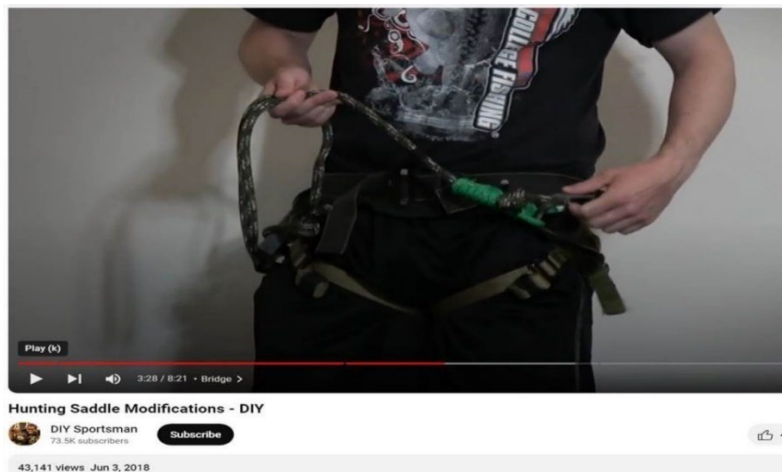
A new example of a bury-in-bury sling was made up, this time for testing in a saddle bridge configuration. The first photo shows the sling being pulled by the tree truck. The sharp bend in the middle of the sling (upper part of photo) is very close to what a saddle bridge would experience.

Samson 12-Strand Eye-and-Eye Tail Splice





YouTube – Hunting Saddle Modifications – DIY



3:20

. . . so what I've done is

3:23

I've tied a friction hitch this was just

3:25

a prusik onto the other side of my

3:28

saddle so I got the free end tight end

3:32

of the saddle and then the actual

3:33

sliding portion of it is on that bridge

3:35

rope and what this basically gives me is

3:38

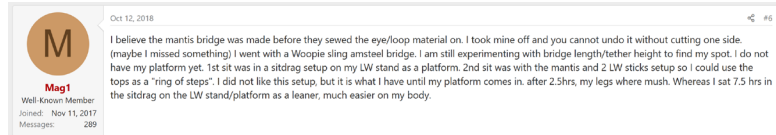
it gives me an adjustable length for

3:41

that bridge

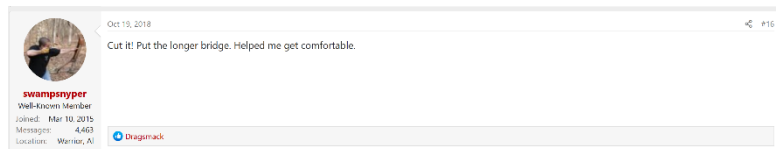
SaddleHunter - Mantis Bridge Mods

“I took mine off and you cannot undo it without cutting one side.”



SaddleHunter - Before I become a cutter....

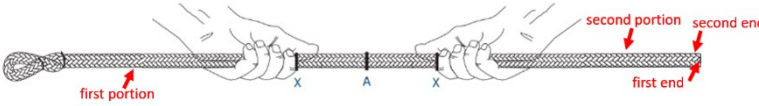
“Cut it! Put the longer bridge. Helped me get comfortable.”



YouTube – How to Add a Webbing Bridge to a Tree Saddle



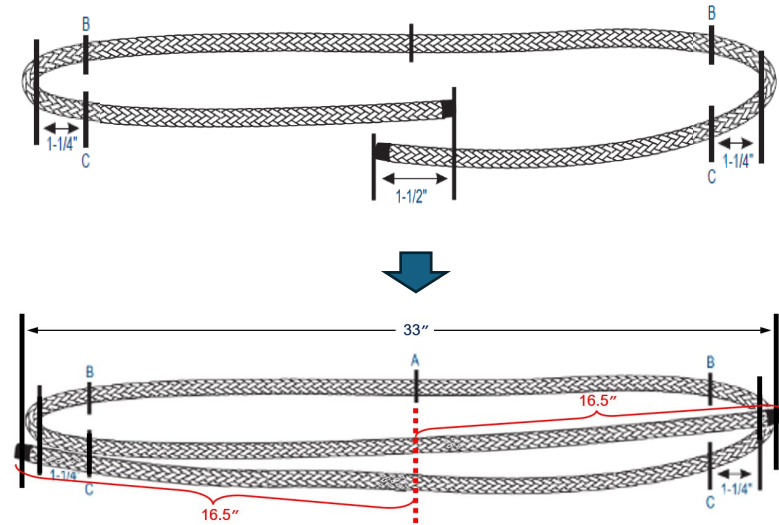
2:31
so first thing we'll do is I'm [going to cut]
2:34
off the am steel bridge come with
2:49
just be real careful if you do this not
2:52
to cut anything else on your saddle

	
a friction hitch being positioned on the main body between the second end and the eye loop, the friction hitch being configured to engage the second bridge loop, the friction hitch comprising a closed loop.	SaddleHunter – Smallest diameter on tether rope “1/4” amsteel in a continuous loop worked extremely well for me for several hours yesterday on the Predator rope that came with the Kestrel. No slippage on my bridge or tether. I put it through several “tests” and it worked great.”  Jun 18, 2018 #7 1/4" amsteel in a continuous loop worked extremely well for me for several hours yesterday on the Predator rope that came with the Kestrel. No slippage on my bridge or tether. I put it through several "tests" and it worked great. Carolina_trad_hn tr Member Joined: Mar 30, 2017 Messages: 52 Location: Upstate SC 

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.

Samson Splicing Instructions – Eye And Eye Tail Splice

“The desired tail length will dictate the starting length of cordage required. For a 33" finished Eye and Eye Tail, an 80" length of 3/8" rope is required.



Samson Ice Tail 33" bridge (Side-by-Side or Bury-in-Bury):

$$L = (80" - 1.5") + 16.5" + 16.5" = 111.5"$$

HammockForums – Everything you always wanted to know about Amsteel but were afraid to ask

“The articles I have read seem to indicate that you should factor in about 20% of the length of the bury.”

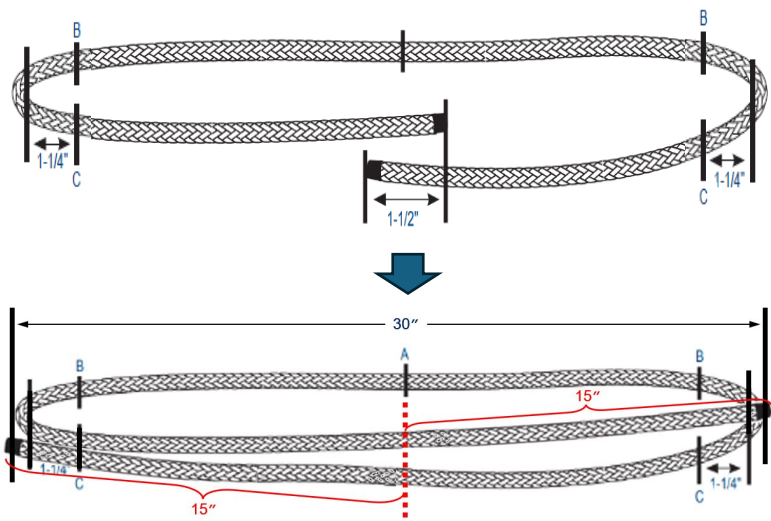


With 20% shrinkage of additional bury:

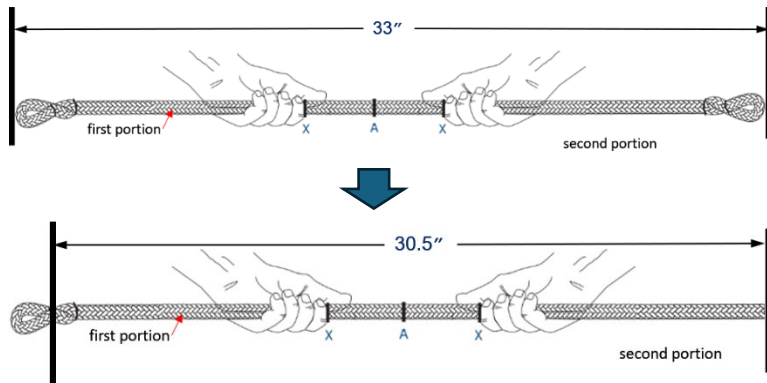
$$L = (80" - 1.5") + (16.5" \times 1.2) + (16.5" \times 1.2) = 118.1"$$

SaddleHunter – Mantis fixed bridge concerns

“I still have the stock 30" bridge installed”

	 boyne bowhunter Moderator Staff member 5th Member Joined: Aug 17, 2016 Messages: 8,968 Location: NW Michigan Feb 25, 2019 I use a pretty long bridge in my setup, ~39". It alleviates any hip pinch and allows me to rest my head on the bridge while sitting without a carabiner sticking in my ear. That said, I still have the stock 30" bridge installed. I use the stock bridge for my climbing/rappelling connection and swap in my adjustable lineman's belt for the tether bridge once I'm settled in the tree. I simply connect the carabiners from the lineman's belt to the bridge loops and insert it into the tether carabiner. I can then slip out the stock amsteel bridge while staying connected all the while. This gives me the ability to adjust the bridge to whatever length I like for longer sits. Since I'm carrying the lineman's belt anyway it isn't costing me any weight or extra bulk. EricS, TNSTAARL, MenneDOR and 2 others Samson Splicing Instructions – Eye And Eye Tail Splice “The desired tail length will dictate the starting length of cordage required. For a 33" finished Eye and Eye Tail, an 80" length of 3/8" rope is required.  Mantis 30" bridge (3" shorter than Ice Tail bridge): $L = (80" - 1.5" - (3" \times 2)) + 15" + 15" = 102.5"$ With 20% shrinkage of additional bury: Mantis 30" bridge: $L = (80" - 1.5" - (3" \times 2)) + (15" \times 1.2) + (15" \times 1.2) = 108.5"$
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.	Samson Splicing Instructions – Eye And Eye Tail Splice Samson: “The desired tail length will dictate the starting length of cordage required. For a 33" finished Eye and Eye Tail, an 80" length of 3/8" rope is required.”

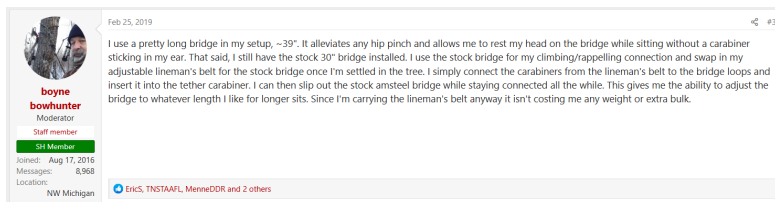
“Mark the size of the eye on each tail. From the inside of the eye, mark both legs of the eye at 1-1/4" ”



Samson Ice Tail bridge (Side-by-Side or Bury-in-Bury):
Dist. = 33" - 1.25" - 1.25" = 30.5"

SaddleHunter – Mantis fixed bridge concerns

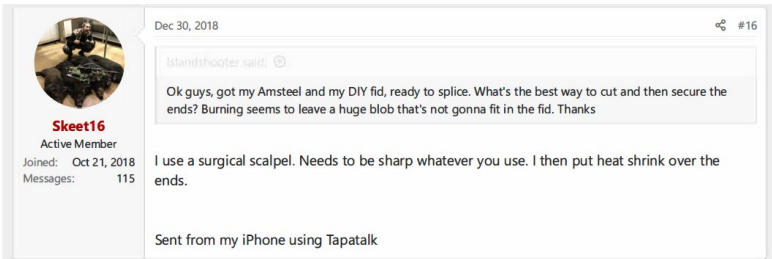
“I still have the stock 30" bridge installed”



SaddleHunter – Tethrd Mantis dimensions



Mantis bridge: 30" bridge, ~2.5" eyes
Dist. = 30" - 2.5" - 2.5" = 25"

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.	YouTube – Hunting Saddle Modifications – DIY  The “Hunting Saddle Modifications – DIY” bridge has a stop knot near the end of the bridge.
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.	YouTube – Hunting Saddle Modifications – DIY  SaddleHunter – Amsteel (1) “I use a surgical scalpel. Needs to be sharp whatever you use. I then put heat shrink over the ends.”  Skeet16 Active Member Joined: Oct 21, 2018 Messages: 115 Dec 30, 2018 #16 Islandshooter said: Ok guys, got my Amsteel and my DIY fid, ready to splice. What's the best way to cut and then secure the ends? Burning seems to leave a huge blob that's not gonna fit in the fid. Thanks I use a surgical scalpel. Needs to be sharp whatever you use. I then put heat shrink over the ends. Sent from my iPhone using Tapatalk SaddleHunter – sealing amsteel ends “I'm assuming you're talking about on a rope mod where you don't need to bury the end. In this instance I just take some tape and wrap the end up a couple of times. It keeps them from fraying kind of like the end of a shoelace.”

	 denots Well-Known Member Joined: Nov 7, 2017 Messages: 2,091 Location: Denham Springs, Louisiana Dec 27, 2018 #4 Bdg848 said: I cut some amsteel and tried to melt the end to keep it from fraying but it didn't work. How do you keep it from fraying? I just covered the ends with shoe goo for now. I'm new to this if you can't tell. I'm assuming you're talking about on a rope mod where you don't need to bury the end. In this instance I just take some tape and wrap the end up a couple of times. It keeps them from fraying kind of like the end of a shoelace. If you have to bury the end there's no need to do anything with it.
6. The bridge rope assembly according to claim 4, wherein the closed loop comprises a single rope being formed into the closed loop.	SaddleHunter – Smallest diameter on tether rope “1/4" amsteel in a continuous loop worked extremely well for me for several hours yesterday on the Predator rope that came with the Kestrel. No slippage on my bridge or tether. I put it through several “tests” and it worked great.”  Carolina_trad_hntr Member Joined: Mar 30, 2017 Messages: 52 Location: Upstate SC Jun 18, 2018 #7 1/4" amsteel in a continuous loop worked extremely well for me for several hours yesterday on the Predator rope that came with the Kestrel. No slippage on my bridge or tether. I put it through several "tests" and it worked great.

	
11. The bridge rope assembly according to claim 1, wherein the main body is comprised of UHMWPE.	YouTube – Mantis Saddle - Setup and Directions The Mantis has an Amsteel bridge.

A person of ordinary skill in the art at the time of the purported invention (in the 2020 time frame) would have had multiple reasons to combine the prior art to arrive at the invention recited in the asserted claims. For example, it was well known that bumps/humps existed at the locations of the spliced joints in a saddle bridge, and these discontinuities presented potential problems for the wearer, such as areas of potential weakness/failure in the bridge, frayed buried ends poking through the bridge, and hindering the bridge from sliding smoothly through a carabiner when the wearer is pivoting (*e.g.*, during active hunting). In addition, and for further example, it was well known that a fixed length bridge (such as the bridge on the Mantis) presented problems for the individual wearer, such as being too long or too short (depending on, *e.g.*, the

wearer's size and preferences) causing discomfort when the wearer is sitting and/or leaning, and creating a cumbersome excessive dangle and/or inability to stow the bridge easily when the user is walking when wearing the saddle, especially in wooded areas.

Solutions to these and other problems would have been readily obvious to a person of ordinary skill in the art at the time of the purported invention (in the 2020 time frame). For example, a full-length internal bury of a fixed eye tail would help to eliminate the humps/bumps in the bridge. For further example, removal of one of the fixed eyes (*i.e.*, the eye loop configured to engage the bridge loop) and replacement of that fixed eye with an adjustable friction hitch (*e.g.*, a Prussik knot) would convert the fixed length bridge to an adjustable length bridge. These problems and solutions, among others, were well-known in the art and would have provided a person of ordinary skill with readily apparent reasons to combine the prior art to arrive at the invention recited in the asserted claims.

Examples of prior art that set forth these and other problems and solutions include, but are not limited to, the references identified in Section II.

For further example, using the '175 Patent's correct priority date (*viz.*, April 15, 2021, because of a break in continuity of the priority benefit claim), the claim chart below demonstrates how the asserted claims are anticipated and rendered obvious in view of the following selected and non-exhaustive prior art references:

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:	YouTube – Tethrd Mantis VS The Phantom Saddles YouTube – Tethrd PHANTOM Review and How-To Tutorial!
a main body comprising a rope having a first end and a second end, the main body having a splice therein to form an eye loop in the main body, the eye loop being	YouTube – Tethrd Mantis VS The Phantom Saddles

configured to engage the first bridge loop, 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



Tethrd Mantis VS The Phantom Saddles



Hunt Appalachia
6.99K subscribers

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7:55

. . . so this is a quarter

7:58

inch piece of AM steel that is spliced

8:00

all the way back through itself and it's

8:03

using a 3/16 prusik that is a continuous

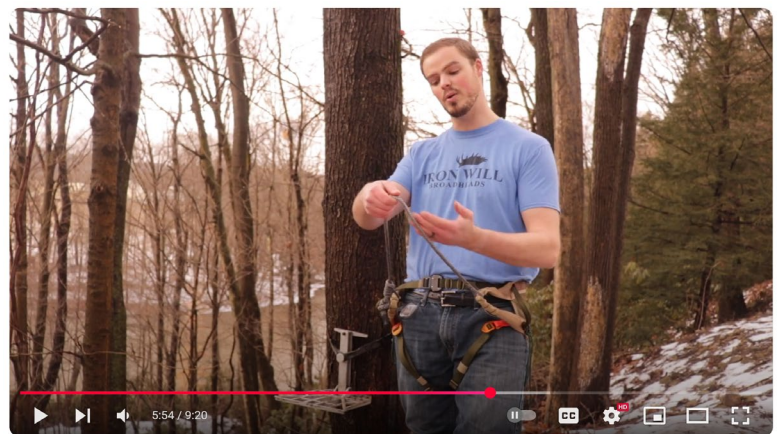
8:07

loop splice so there's no extra knots on

8:10

the AM steel it's just a prusik knot

YouTube – Tethrd PHANTOM Review and How-To Tutorial!



Tethrd PHANTOM Review and How-To Tutorial!



Average Jack Archery
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503

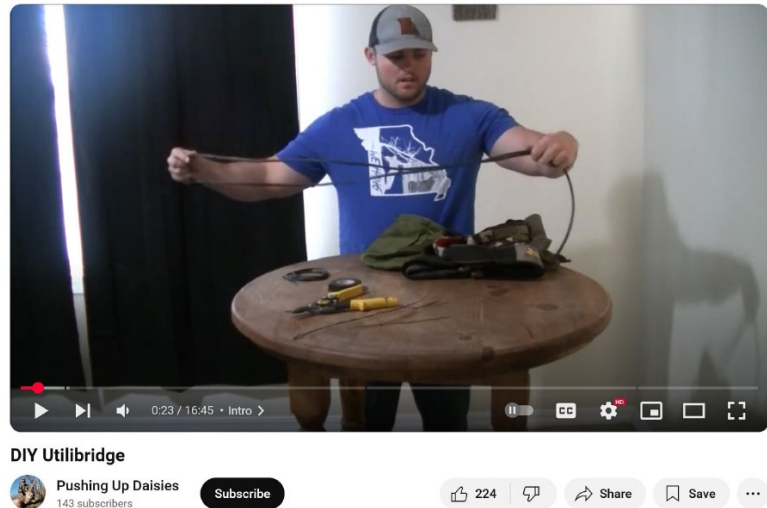


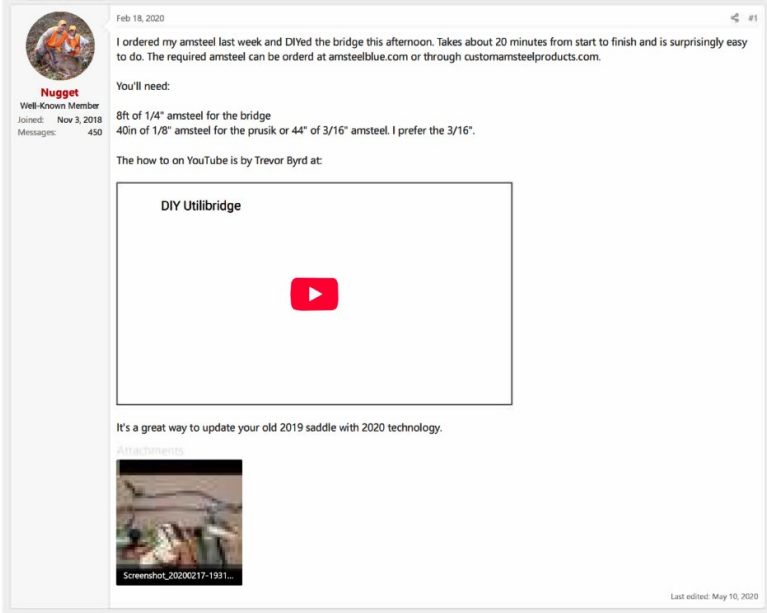
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	5:49 . . . now this adjustable bridge 5:51 system is really slick it's an entire 5:53 piece of AM steel where the berry' is 5:55 all the way through the entire length Saddle Hunter - Tethrd Phantom's Bridge Knot “The bridge on the Phantom is spliced all the way back through itself so it's essentially not a hollow core rope anymore. The prussic is made from 3/16 spliced continuous loop and the main line of the bridge is 1/4" spliced back inside and is a little less than 1/2" final diameter.” 
a friction hitch being positioned on the main body between the second end and the eye loop, the friction hitch being configured to engage the second bridge loop, the friction hitch comprising a closed loop.	YouTube – Tethrd Mantis VS The Phantom Saddles YouTube – Tethrd PHANTOM Review and How-To Tutorial! The Phantom has a friction hitch in the form of Prusik knot.
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.	YouTube – DIY Utilibridge 

	0:18 and what the kit is gonna consist of is 0:22 8 feet of quarter inch am steel SaddleHunter – DIY utilibridge “8ft of 1/4" amsteel for the bridge” 
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.	YouTube – DIY Utilibridge 16:00 this bridge that we just made show you 16:05 the length here from the actual we're 16:17 looking at approximately thirty it's 16:22 hard to see that about thirty six after 16:25 the knot it'll be about 34 inches of 16:28 adjustability

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.

YouTube – Tethrd Mantis VS The Phantom Saddles



Tethrd Mantis VS The Phantom Saddles

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YouTube – Tethrd PHANTOM Review and How-To Tutorial!



Tethrd PHANTOM Review and How-To Tutorial!

Average Jack Archery

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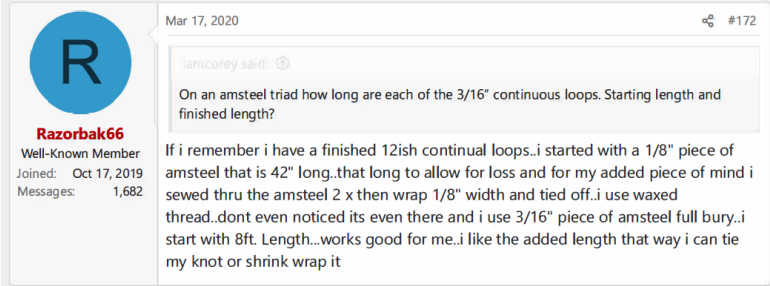
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Thanks

Clip

Save

	 The Phantom has a stop knot near the end of the bridge.
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.	YouTube – Tethrd Mantis VS The Phantom Saddles YouTube – Tethrd PHANTOM Review and How-To Tutorial! The Phantom has shrink wrap on the end of the bridge. SaddleHunter – H2 vs Tethrd (1) “i start with 8ft. Length ... works good for me .. i like the added length that way i can tie my knot or shrink wrap it”  Mar 17, 2020 #172 iamcorey said: On an amsteel triad how long are each of the 3/16" continuous loops. Starting length and finished length? If i remember i have a finished 12ish continual loops..i started with a 1/8" piece of amsteel that is 42" long..that long to allow for loss and for my added piece of mind i sewed thru the amsteel 2 x then wrap 1/8" width and tied off..i use waxed thread..dont even noticed its even there and i use 3/16" piece of amsteel full bury..i start with 8ft. Length...works good for me..i like the added length that way i can tie my knot or shrink wrap it
6. The bridge rope assembly according to claim 4, wherein the closed loop comprises a single rope being formed into the closed loop.	YouTube – DIY Utilibridge 7:44 ... okay now the continuous Continuous Loop 7:56 loop so this is 40 inches right here * * * Prusik Knot 14:02 we have both the continuous loop and we 14:08 have the utili bridge on now the part

	14:11 that everybody wants to see how do you 14:14 make a prusik knot with a continuous 14:18 loop that's already attached
11. The bridge rope assembly according to claim 1, wherein the main body is comprised of UHMWPE.	YouTube – Tethrd Mantis VS The Phantom Saddles YouTube – Tethrd PHANTOM Review and How-To Tutorial! The Phantom has an Amsteel bridge.

A person of ordinary skill in the art at the time of the purported invention (in the 2021 time frame) would have had multiple reasons to combine the prior art to arrive at the invention recited in the asserted claims. The DIY Utilibridge was designed and developed to be a functional replacement for the bridge on the Phantom saddle, or to be used as a bridge on a non-Phantom saddle. The DIY Utilibridge could be custom made to a desired length, could be used on any preferred saddle of choice, and could be fabricated less expensively than purchasing a Phantom saddle and/or Phantom bridge. The DIY Utilibridge was well-known in the art and a person of ordinary skill would have had readily apparent reasons to combine the prior art to arrive at the invention recited in the asserted claims.

Examples of prior art that set forth these and other problems and solutions include, but are not limited to, the references identified in Section II.

Other exemplary combinations also are apparent given the prior art items identified herein, and Defendants expect to rely thereon as may be suggested by further developments in this action.

II. Prior Art

A non-exhaustive list of relevant prior art that Defendant currently intends to rely upon is identified below:

No.	Prior Art Reference	Date of Publication
1	ArboristSite - Amsteel Blue Splicing Experiments.pdf	April 18, 2008 – April 30, 2008
2	ArboristSite - Biners and rope bridge.pdf	December 26, 2013 – January 8, 2014
3	HammockForums - Continuous loop bury length question.pdf	April 21, 2012 – April 22, 2012
4	HammockForums - Continuous Loop pictoral.pdf	November 14, 2012 – February 24, 2013
5	HammockForums - Everything you always wanted to know about Amsteel but were afraid to ask (1).pdf	February 10, 2016 – February 11, 2016
6	HammockForums - Everything you always wanted to know about Amsteel but were afraid to ask (2).pdf	February 13, 2016 – January 29, 2017
7	HammockForums - Prusik knot with Zing lt.pdf	April 12, 2015 – April 13, 2015
8	HammockForums - Splicing loops in Amsteel question and Improved Soft Shackle.pdf	June 18, 2015 – June 18, 2015
9	HammockForums - Why does one taper while splicing.pdf	April 16, 2018 – April 17, 2018
10	L-36 - Loops, Loups, and Loupes.pdf	November 2, 2012
11	SaddleHunter - Adjustable amsteel bridge for sit drag - how to.pdf	September 29, 2017 – September 30, 2017
12	SaddleHunter - Adjustable bridge (1).pdf	September 22, 2017 – September 24, 2017
13	SaddleHunter - Adjustable bridge (2).pdf	September 24, 2017 – September 26, 2017
14	SaddleHunter - Adjustable bridge (3).pdf	September 26, 2017 – December 31, 2018
15	SaddleHunter - Amsteel (1).pdf	December 28, 2018 – December 30, 2018
16	SaddleHunter - Amsteel (2).pdf	December 30, 2018 – January 6, 2019
17	SaddleHunter - Amsteel blue vs amsteel	May 24, 2018 – May 25, 2018
18	SaddleHunter - Amsteel bridge question.pdf	January 21, 2017 – August 8, 2017
19	SaddleHunter - Amsteel Prussic.pdf	June 17, 2018 – January 11, 2020
20	SaddleHunter - Amsteel questions	April 1, 2018 – April 2, 2018
21	SaddleHunter - Before I become a cutter	October 19, 2018 – October 19, 2018
22	SaddleHunter - Bridge length.pdf	September 24, 2018 – January 25, 2021
23	SaddleHunter - DIY Utilibridge (1)	January 11, 2020 – January 11, 2020
24	SaddleHunter - DIY Utilibridge (2)	January 11, 2020 – January 11, 2020

25	SaddleHunter - DIY utillibridge	February 18, 2020 – March 7, 2020
26	SaddleHunter - Finished my sitdrag and harness.pdf	February 4, 2018 – February 6, 2018
27	SaddleHunter - Fixed vs Whoopie bridge.pdf	October 14, 2018 – October 14, 2018
28	SaddleHunter - H2 Triad Bridge.pdf	February 28, 2020 – March 16, 2020
29	SaddleHunter - H2 vs tethrd (1).pdf	March 17, 2020 – March 20, 2020
30	SaddleHunter - H2 vs tethrd (2).pdf	March 20, 2020 – March 22, 2020
31	SaddleHunter - Mantis Bridge Mods.pdf	October 8, 2018 – October 12, 2018
32	SaddleHunter - Mantis fixed bridge concerns.pdf	February 25, 2019 – March 2, 2019
33	SaddleHunter - None lock stitched bridge.pdf	January 1, 2019 – January 3, 2019
34	SaddleHunter - Official " Tethrd Mantis " Review Thread!.pdf	September 18, 2018 – October 5, 2018
35	SaddleHunter - Replacing the bridge carabiner.pdf	March 7, 2018 – March 20, 2018
36	SaddleHunter - Saddleplooza.pdf	February 20, 2018 – February 22, 2018
37	SaddleHunter - sealing amsteel ends.pdf	December 27, 2018 – December 28, 2018
38	SaddleHunter - shifting.pdf	December 2, 2018 – December 5, 2018
39	SaddleHunter - Sitdrag loop question.pdf	February 3, 2018 – February 11, 2018
40	SaddleHunter - Slummin' it in a Kestrel.pdf	August 22, 2018 – August 23, 2018
41	SaddleHunter - Smallest diameter on tether rope.pdf	June 18, 2018 – June 23, 2018
42	SaddleHunter - Spliced Amsteel.pdf	September 1, 2018 – September 18, 2018
43	SaddleHunter - Splicing rope (1).pdf	January 12, 2016 – January 13, 2016
44	SaddleHunter - Splicing rope (2).pdf	January 13, 2016 – January 16, 2016
45	SaddleHunter - Splicing rope (3).pdf	January 16, 2016 – January 23, 2016
46	SaddleHunter - Splicing rope (4).pdf	January 23, 2016 – August 6, 2018
47	SaddleHunter - Splicing rope (5).pdf	August 6, 2018 – August 24, 2018
48	SaddleHunter - Tether and Bridge Length.pdf	October 10, 2018 – October 11, 2018
49	SaddleHunter - Tethrd Mantis dimensions.pdf	September 25, 2018 – October 1, 2018

50	SaddleHunter - Tethrd Phantom's Bridge Knot.pdf	April 13, 2020 – November 23, 2020
51	SaddleHunter - Tie in Height in relation to sitting or leaning.pdf	April 5, 2017 – August 4, 2017
52	SaddleHunter - Upgrade your Tethrd Mantis into a Tethrd Phantom (Amsteel prussik bridge) (1).pdf	January 17, 2020 – January 17, 2020
53	SaddleHunter - Upgrade your Tethrd Mantis into a Tethrd Phantom (Amsteel prussik bridge) (2).pdf	January 18, 2020 – January 21, 2020
54	SaddleHunter - What do I need.pdf	December 27, 2018 – December 29, 2018
55	SaddleHunter - What size tethrd mantis do I need.pdf	February 13, 2019 – February 14, 2019
56	Samson 12-Strand Eye-and -Eye Tail Splice.pdf	July 2012
57	TreeBuzz - Ice Tail loop.pdf	October 28, 2012 – October 30, 2012
58	YouTube - DIY Utilibridge.pdf	January 19, 2020
59	YouTube - How to Add a Webbing Bridge to a Tree Saddle.pdf	April 3, 2019
60	YouTube - How to splice Amsteel for a bridge on your hunting saddle.pdf	March 4, 2018
61	YouTube - How to Splice an eye and eye tail.pdf	April 5, 2013
62	YouTube - Hunting Saddle Modifications - DIY.pdf	June 3, 2018
63	YouTube - Mantis Saddle - Setup and Directions.pdf	December 30, 2018
64	YouTube - Tethrd Mantis VS The Phantom Saddles.pdf	January 21, 2020
65	YouTube - Tethrd PHANTOM Review and How-To Tutorial!.pdf	January 26, 2020
66	U.S. Pat. No. 4,099,750 (McGrew)	July 11, 1978
67	U.S. Pat. No. 4,962,929 (Melton Jr.)	October 16, 1990
68	U.S. Pat. App. Pub. No. 2008/0000719A1 (Jones)	January 3, 2008
69	U.S. Pat. No. 9,340,925 (Mozagai)	May 7, 2016
70	The commercial Mantis hunting saddle and bridge system in public use and on sale	Before January 7, 2019
71	The prototype Phantom hunting saddle and bridge system in public use and on sale	Before April 15, 2020
72	The commercial Phantom hunting saddle and bridge system in public use and on sale	Before April 15, 2020
73	The prototype DIY Utilibridge system in public use and on sale	Before April 15, 2020
74	The commercial DIY Utilibridge system in public use and on sale	Before April 15, 2020

In all likelihood, given that discovery is at an early stage, Defendant's ongoing investigations will uncover additional prior art relevant to the asserted claims. Defendant reserves its right to modify this table, including without limitation by adding or withdrawing prior art to or

from this table and/or modifying this table to further reflect publication, public use, and/or on sale dates.

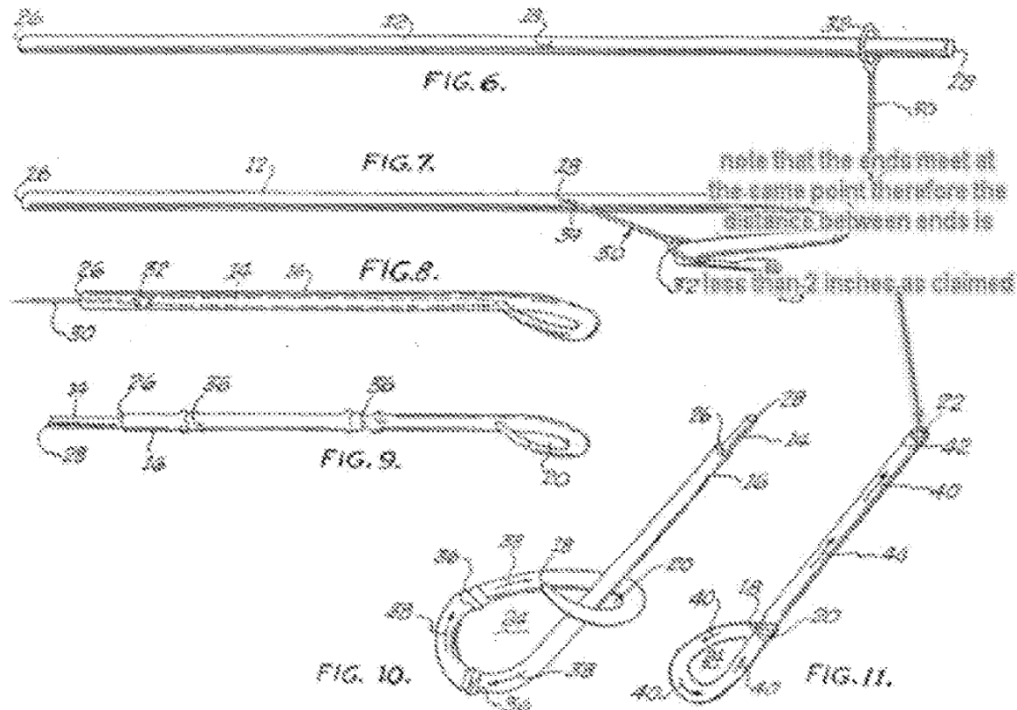
III. Unenforceability Contentions

Defendant contends that the asserted claims are unenforceable because, *inter alia*, the named inventors' intentionally failed to disclose known material and non-cumulative prior art to the USPTO with the intent to deceive the patent examiner during the prosecution of the patent application that became the original '175 Patent.

For example, on February 24, 2022, during the prosecution of the original '175 Patent's parent application (U.S. Patent Application No. 17/231,717 ("the '717 Application")), the examiner cited, *inter alia*, U.S. Patent No. 4,962,969 to Melton Jr. The Primary Examiner was Daniel P. Cahn and the Assistant Examiner was Candace L. Bradford.

The examiner issued a final rejection of the '717 Application's then-pending Claims 1-5 and 7-13, finding as follows:

Melton teaches the utility of a rope having a splice therein to form eye loop 24, as best seen in Figures 6-11,



Therefore, it would have been obvious to one of ordinary skill in the art before the effective filing date of the claimed invention to replace the main body of Jones with a rope having a splice as taught by Melton Jr. so as to enhance the sturdiness and aesthetics of the equipment component by providing a desired color to improve the strength and appearance of the apparatus.

In response to the examiner's final rejection, Tethrd canceled pending Claims 1-5 and 7-13 of the pending '717 Application, leaving only Claim 14 pending.

During the subsequent prosecution of the original '175 Patent, Tethrd (*viz.*, Tethrd's named inventors) did not disclose Melton Jr. to the USPTO in an Information Disclosure Statement or otherwise. The Primary Examiner was Amy J. Sterling.

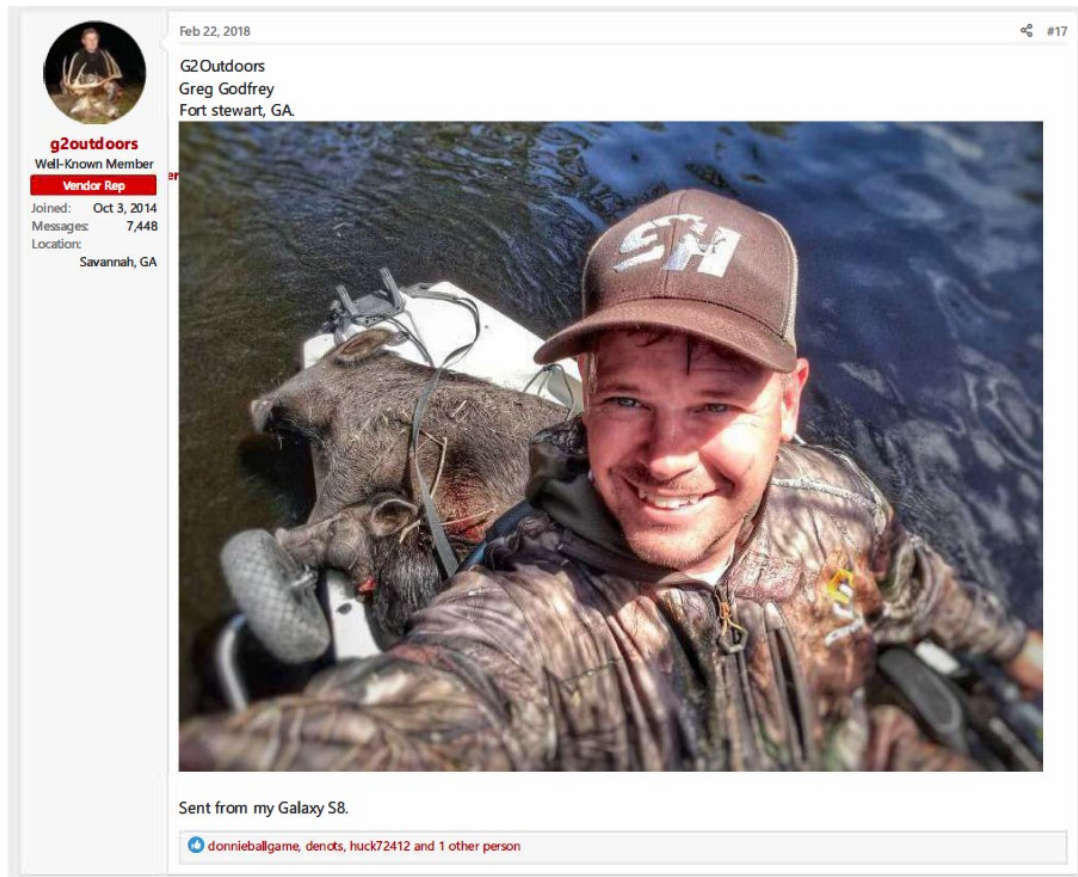
Melton Jr. is not listed in the "References Cited" on the cover of the original '175 Patent, and there is no indication in the file of the patent application for the original '175 Patent that the examiner considered Melton Jr. during the prosecution of the original '175 Patent. Melton Jr. was material and non-cumulative prior art with respect to the claims of the original '175 Patent.

The named inventors of the original '175 Patent knew of Melton Jr. and intentionally failed to disclose Melton Jr. to the USPTO with the intent to deceive the patent examiner during the prosecution of the patent application that became the original '175 Patent.

Defendant contends that the asserted claims are unenforceable because of the failure to disclose to the patent examiner that the named inventors derived critical contributions to the claimed invention from another person, but the patent examiner was not informed of such contributions and was misled to believe that the named inventors were the inventive entity.

For further example, the principals of Tethrd – *viz.*, Greg Godfrey aka "g2outdoors" and Shawn Chadwick aka "BassboysLLP" – were active participants on the Saddle Hunter forum, a popular message board where modifications to saddles and saddle bridges were routinely discussed and shown publicly.

SaddleHunter – Saddleplooza



These discussions on the Saddle Hunter forum were all public on the Internet and were readily accessible by interested persons in the field, including via general Internet searches (e.g., Google) and message board searches conducted within the Saddle Hunter forum website itself. Many of the features claimed in the '175 patents were publicly disclosed and discussed on those message boards, and Tethrd's named inventors – viz., Greg Godfrey – were aware that those features had been publicly disclosed. Those public disclosures all pre-dated the very earliest possible claimed priority date of the '175 patent (viz., Jan. 7, 2020) by more than one year, and were thus indisputable prior art under 35 USC § 102.

The Tethrd inventors had a duty to disclose all known material, non-cumulative prior art to the USPTO during the prosecution of their patent applications, and the inventors were aware of

that obligation. Nonetheless, the Tethrd inventors disclosed none of this public prior art information to the USPTO during the prosecution of the '175 Patent, or any of its predecessor applications. Moreover, this information was not cumulative of the prior art considered by the USPTO, which comprised only patents and patent applications (see IDS and references cited). The Tethrd inventors – *viz.*, Greg Godfrey – purposely withheld this material, non-cumulative prior art from the USPTO with the intent to deceive the patent examiner to allow the patent claims over the limited prior art of record. The Tethrd inventors – *viz.*, Greg Godfrey – were successful in their deception because the patent examiner did not locate or consider any of this material, non-cumulative prior art during the patent examination process and allowed the patent claims to issue over the limited prior art that was in the record.

An example of the material information that was withheld from the USPTO during the prosecution of the '175 patent includes the following:

Claim 1, and thus every claim in the '175 Patent, recites the following elements:

1. . . . a friction hitch being positioned on the m[a]in body between the second end and the eye loop, the friction hitch being configured to engage the second bridge loop, the friction hitch comprising a closed loop.

Named inventor Greg Godfrey (g2outdoors) learned of this “closed loop friction hitch” feature during a public Saddle Hunter conversation (as did another Tethrd principal, Shawn Chadwick (BassBoysLLP)), but none of the Tethrd inventors – *viz.*, Greg Godfrey – disclosed any of this information to the USPTO during the prosecution of the '175 Patent, or any of its predecessor patent applications. (A Prusik knot was a well-known type of friction hitch in the prior art.)

SaddleHunter - Amsteel Prussic

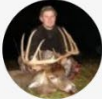


Carolina_trad_hntr
Member
Joined: Mar 29, 2017
Messages: 52
Location: Upstate SC

Jun 16, 2018 #1

Anyone using 1/4" Amsteel (continuous loop) to make a prussic? I've tried one up and played around pulling on it in the living room, no slippage on the Predator rope I've tried pulling across. Obviously a double fisherman's knot or any other tied knot to make a loop is probably a bad idea with Amsteel but continuous loop shouldn't give any problems. Thoughts?

Report Like Reply



g2outdoors
Well-Known Member
Vendor Rep
Joined: Oct 2, 2014
Messages: 7,448
Location: Savannah, GA

Jun 17, 2018 #2

They work great. Amsteel is the wonder rope. Splice the continuous loop and you'll be golden.

Sent from my Galaxy S8.

Saddle: Tethrd Mantis
Climbing: Gecko Climbing Spurs & Climbing sticks
Platform: Tethrd Predator

Are you ready for SADDLEPALOOZA 2019?

Here are some of my favorite saddle hunting products

Check out my YouTube channel where I catalog all my Saddle and Outdoor Adventures.

Tethrd Co-owner.

Report Like Reply

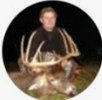
Ted Otten and Carolina_trad_hntr



Carolina_trad_hntr
Member

Jun 17, 2018 #3

Worked like a charm. Replaced the prussic on my adjustable bridge and tether. That's a pretty good weight savings for effort and cost involved. Amsteel is the wonder rope, I love it. Wonder how amsteel prussic on amsteel bridge would work, as long as the diameter rule is followed...may be too slick.



g2outdoors
Well-Known Member
Vendor Rep
Joined: Oct 2, 2014
Messages: 7,448
Location: Savannah, GA

Jun 19, 2018 #7

redsquirrel said: ☹

LoL... I know you use an amsteel bridge. In this post he was asking about making an amsteel prussik and using it on a piece of predator rope to hang on.

Ha! I don't see why am amsteel prusik wouldn't work, but there might be better options. I'm not positive on that part.

Sent from my Galaxy S8.

Saddle: Tethrd Mantis
Climbing: Gecko Climbing Spurs & Climbing sticks
Platform: Tethrd Predator

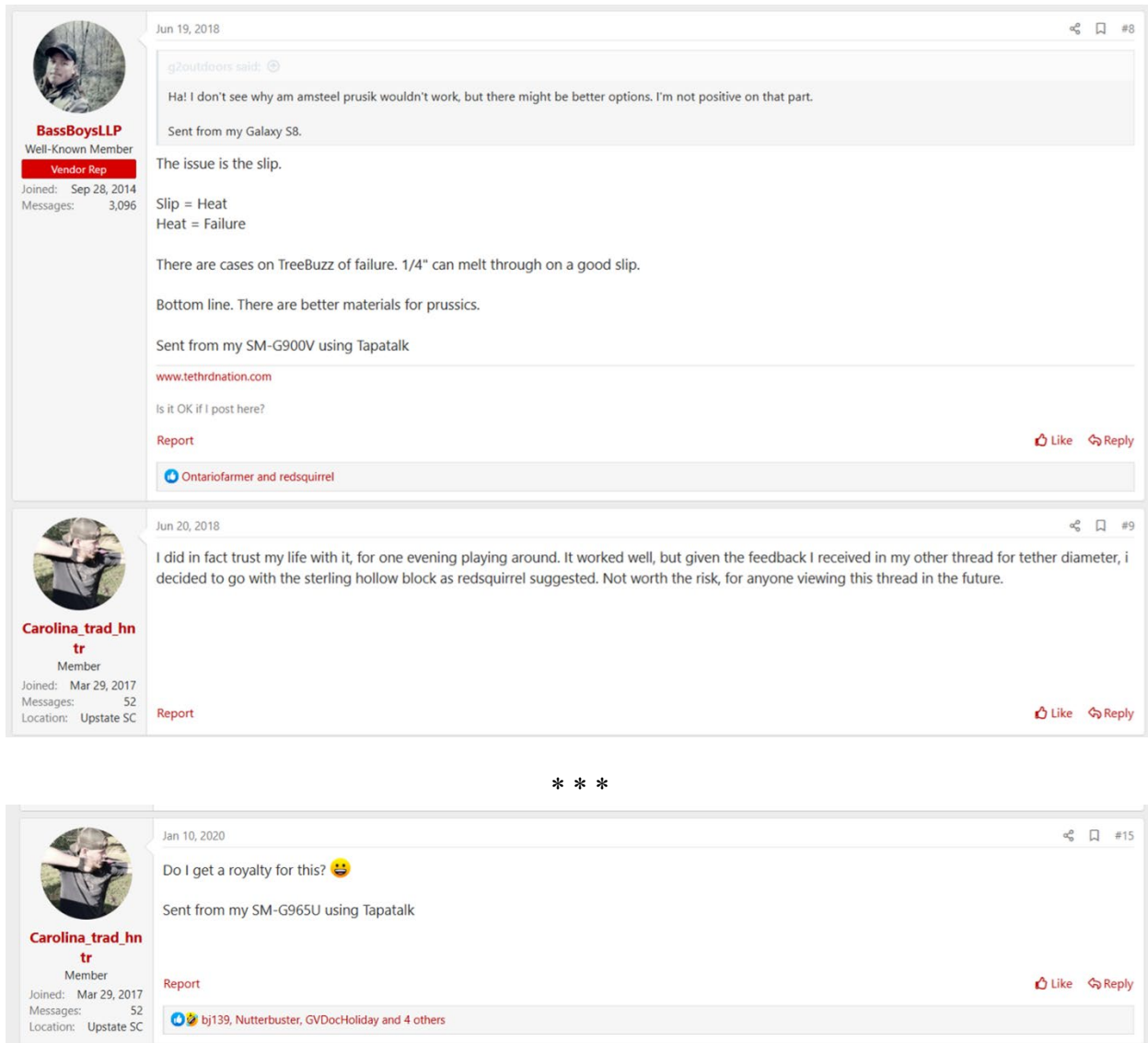
Are you ready for SADDLEPALOOZA 2019?

Here are some of my favorite saddle hunting products

Check out my YouTube channel where I catalog all my Saddle and Outdoor Adventures.

Tethrd Co-owner.

Report Like Reply



As further shown in the above message board conversation (as well as other prior art set forth in Section II), other features claimed in the '175 Patent were well-known in the prior art, but were not disclosed by any of the Tethrd inventors, including the following:

6. The bridge rope assembly according to claim 4, wherein the closed loop comprises a single rope being formed into the closed loop.
10. The bridge rope assembly according to claim 9, wherein the main body and the friction hitch each are comprised of U[H]MWPE.

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

The named inventors of the '175 Patent – *viz.*, Greg Godfrey – knew of this highly material and non-cumulative prior art, including these message board posts, and intentionally failed to disclose them to the USPTO with the intent to deceive the patent examiner during the prosecution of the patent application that became the '175 Patent.

As shown in the message board conversations and other prior art set forth in Section II, other features claimed in the '175 Patent were well-known in the prior art, including by Tethrd's principals, but were not disclosed by any of the Tethrd inventors, including:

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:

a main body comprising a rope having a first end and a second end, the main body having a splice therein to form an eye loop in the main body, the eye loop being configured to engage the first bridge loop, 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

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.

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.

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.

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.
7. The bridge rope assembly according to claim 6, wherein the single rope of the closed loop has a length between 40.0 inches and 60.0 inches.
8. The bridge rope assembly according to claim 7, wherein the closed loop has a total circumference of between 20.0 inches and 30.0 inches.
9. The bridge rope assembly according to claim 1, wherein the closed loop has a total circumference of between 20.0 inches and 30.0 inches.
12. The bridge rope assembly according to claim 9, wherein a distance of the eye loop to the second end is between 24.0 inches and 40.0 inches.
13. The bridge rope assembly according to claim 12, wherein the closed loop has a total circumference of between 20.0 inches and 30.0 inches.
14. The bridge rope assembly according to claim 12, wherein a distance between the first and second ends is less than 2.0 inches.

Defendant further contends that the asserted claims are unenforceable because the named inventors intentionally withheld highly material and non-cumulative prior art from the patent examiner during the prosecution of the '175 Patent, including but not limited to the prior art references that are not cited in the '175 Patent set forth in Section II.

The named inventors of the '175 Patent knew of at least some of this highly material and non-cumulative prior art and intentionally failed to disclose any of this prior art to the USPTO with the intent to deceive the patent examiner during the prosecution of the patent application that became the '175 Patent.

Date: July 2, 2025

Respectfully submitted,

/s/ Brenton R. Babcock

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Counsel for Crüzr Saddles LLC

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on July 2, 2025, upon:

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