

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Shuttle Slide, LLC

Petitioner,

v.

Sea Swivel Inc.

Patent Owner

Case No. Unassigned

U.S. Patent No. 12,258,111

Issued: March 25, 2025

Filed: September 26, 2024

Inventor: Mark S. Berta, Jr.

Title: Swivel Mounts for Attaching and Maneuvering Accessories
over the Gunnel of a Boat or any Other Mounting Surface

**DECLARATION OF EXPERT, RUSSELL TAYLOR IN SUPPORT OF
PETITIONER, SHUTTLESLIDE, LLC'S PETITION FOR POST-GRANT
REVIEW OF U.S. PATENT NO. 12,258,111 UNDER 35 U.S.C. § 321 and 37
C.F.R. § 42.200**

I, Russell Taylor, hereby certify pursuant to 28 U.S.C. §1746 and state that:

1. I am over the age of eighteen (18) and competent to make this Declaration.

2. I am the Chief Technical Officer of Petitioner Shuttleslide LLC. I was asked to offer technical opinions relating to U.S. Patent No. 12,258,111 (the '011 Patent) and various prior art references.
3. I have been the owner and Chief Technical Officer of Shuttleslide LLC since 2018.
4. In my role as Chief Technical Officer at Shuttleslide, I design linear and rotating bearing systems for boats marketed to the trolling motor industry.
5. I graduated from the University of South Florida with a degree in Mechanical Engineering.
6. I have been working as a mechanical engineer since 1990.
7. I have designed products for the marine industry since the late 1990s.
8. Since the late 1990s, I have designed mechanical and electrical products, which are mounted to boats, for the marine industry.
9. I am the first named inventor on U.S. Patent No. 8,480,052 titled Vibration Isolating Device
10. I have knowledge of existing trolling motor mounts.
11. I have knowledge of mounts to secure both trolling motors and accessories other than trolling motors to boat gunnels.
12. My opinions, as explained below, are based on my education, experience, and background in the fields discussed above.

13. This declaration is organized as follows:

- I. Claims 1, 2, 4, 5, 8, 10, and 11 are Unpatentable Under 35 U.S.C. § 102 as Anticipated by the Grady-White Pivoting Trolling Motor Mount.
- II. Claim 5 is unpatentable as obvious under 35 U.S.C. § 103 based on Gillespie in view of U.S. Patent No. 11,584,495 to Hunziker (hereinafter “Hunziker”).
- III. Claim 6 is unpatentable as obvious under 35 U.S.C. § 103 based on Gillespie in view of Hunziker in further view of Universal Mounting Plate.
- IV. Claim 7 is unpatentable as obvious under 35 U.S.C. § 103 based on Gillespie in view of U.S. Patent Application Publication 2010/0242828 to Gratsch (hereinafter “Gratsch”).
- V. Claim 8 is unpatentable as obvious under 35 U.S.C. § 103 based on Gratsch in view of Leiss.
- VI. Claim 8 is unpatentable as obvious under 35 U.S.C. § 103 based on U.S. Patent No. 4,044,489 to Henze et al. (hereinafter “Henze”) in view of Leiss.
- VII. Claim 8 is unpatentable as obvious under 35 U.S.C. § 103 based on Henze in view of Gratsch.

- VIII. Claim 9 is unpatentable as obvious under 35 U.S.C. § 103 based on Leiss in view of U.S. Patent No. 3,999,500 to Friedel et al. (hereinafter “Friedel).
- IX. Claim 9 is unpatentable as obvious under 35 U.S.C. § 103 based on Gratsch in view of Leiss in further view of Friedel.
- X. Claim 9 is unpatentable as obvious under 35 U.S.C. § 103 based on Henze in view of Leiss in further view of Friedel.
- XI. Claim 9 is unpatentable as obvious under 35 U.S.C. § 103 based on Henze in view of Gratsch in further view of Friedel.
- XII. Claims 11-12 are unpatentable as obvious under 35 U.S.C. § 103 based on Leiss in view of common knowledge of one skilled in the art.
- XIII. Claim 11-12 are unpatentable as obvious under 35 U.S.C. § 103 based on Gratsch in view of Leiss in further view of common knowledge of one skilled in the art.
- XIV. Claims 11-12 are unpatentable as obvious under 35 U.S.C. § 103 based on Henze in view of Leiss in further view of common knowledge of one skilled in the art.
- XV. Claims 11-12 are unpatentable as obvious under 35 U.S.C. § 103 based on Henze in view of Gratsch in further view of common knowledge of one skilled in the art.

- XVI. Claim 14 is unpatentable as obvious under 35 U.S.C. § 103 based on Leiss in view of Hunziker.
- XVII. Claim 14 is unpatentable as obvious under 35 U.S.C. § 103 based on Gratsch in view of Leiss in further view of Hunziker.
- XVIII. Claim 14 is unpatentable as obvious under 35 U.S.C. § 103 based on Henze in view of Leiss in further view of Hunziker
- XIX. Claim 14 is unpatentable as obvious under 35 U.S.C. § 103 based on Henze in view of Gratsch in further view of Hunziker.
- XX. Claims 15-18 are unpatentable as obvious under 35 U.S.C. § 103 based on Gillespie in view of Hunziker in further view of the common knowledge of one skilled in the art.
- XXI. Claims 6 is unpatentable under 35 U.S.C. § 112 as indefinite.
- XXII. Claims 10 and 13 are unpatentable under 35 U.S.C. § 112 as lacking an adequate written description.
- XXIII. Conclusion

**I. Claims 1, 2, 4, 5, 8, 10, and 11 are Unpatentable Under 35
U.S.C. § 102 as Anticipated by the Grady-White Pivoting
Trolling Motor Mount**

14. Composite Exhibit Shuttleslide 1012 depicts the Grady-White Pivoting Trolling Motor Mount.

15. The Grady-White trolling motor mount described in the Sport Fishing Magazine article is identical to the Grady-White Pivoting Trolling Motor Mount depicted in the images of composite Exhibit Shuttleslide 1012.

16. Grady-White Pivoting Trolling Motor Mounts were publicly available at least as early as May 15, 2014, the date of the Sport Fishing Magazine Article.

17. Figure 1 of composite Exhibit Shuttleslide 1012, an annotated version of which is included below as Figure 1, depicts the Grady-White Pivoting Trolling Motor Mount secured to a trolling motor and mounted to a gunnel.

18. Figure 2 of composite Exhibit Shuttleslide 1012, an annotated version of which is included below as Figure 2, depicts a bottom side of a portion of the Grady-White Pivoting Trolling Motor Mount secured to a trolling motor and released from to the gunnel.

19. Figure 3 of composite Exhibit Shuttleslide 1012, an annotated version of which is included below as Figure 3, depicts a close up of a portion of the Grady-White Pivoting Trolling Motor Mount secured to a trolling motor and mounted to the gunnel.

20. Figure 4 of composite Exhibit Shuttleslide 1012, an annotated version of which is included below as Figure 4, depicts a bottom side of a portion of the Grady-

White Pivoting Trolling Motor Mount secured to a trolling motor and released from to the gunnel, along with a measuring tape along the length of the elongated mounting plate.

21. Figure 5 of composite Exhibit Shuttleslide 1012, an annotated version of which is included below as Figure 5, depicts a top side of the support plate of the Grady-White Pivoting Trolling Motor Mount secured to the gunnel, along with a measuring tape along the length of the support plate.

22. The Grady-White Pivoting Trolling Motor Mount provides enough information for a person of skill in the art to have known how to make or use the subject matter in claims 1, 2, 4, 5, 8, 10, and 11 without undue experimentation at the time of the Patent-in-Suit's filing date.

23. The Grady-White Pivoting Trolling Motor Mount discloses each and every element of claims 1, 2, 4, 5, 8, 10, and 11 and describes this subject matter in at least the same level of technical detail as the Patent-in-Suit.

24. It would not have required undue experimentation for a person of skill in the art to have made and used the anticipatory subject matter in the Grady-White Pivoting Trolling Motor Mount because all the relevant claim elements discussed in the reference were known to a person of skill in the art at the time of the Patent-in-Suit's filing date.

25. The Grady-White Pivoting Trolling Motor Mount discloses a swivel mount.

26. As shown above in Annotated Fig. 2 of Exhibit Shuttleslide 1012 an elongated mounting plate comprising first and second opposing faces spaced apart by one or more peripheral sidewalls is disclosed by the Grady-White Pivoting Trolling Motor Mount.

27. The first opposing face of the elongated mounting plate is visible in Fig. 2 of Exhibit Shuttleslide 1012 and the second opposing face is adjacent the trolling motor mounted to the elongated mounting plate.

28. As shown in Annotated Fig. 3 of Exhibit Shuttleslide 1012, a support plate comprising first and second opposing faces spaced apart by one or more peripheral sidewalls is disclosed by the Grady-White Pivoting Trolling Motor Mount.

29. The first opposing face of the support plate is visible in Fig. 3 of Exhibit Shuttleslide 1012 and the second opposing face is adjacent the gunnel.

30. Fig. 4 of Exhibit Shuttleslide 1012 depicts the length of the elongated mounting plate as approximately 10 inches.

31. Fig. 5 of Exhibit Shuttleslide 1012 depicts the length of the support plate as approximately 4 inches.

32. The support plate length of approximately 4 inches is less than half the elongated mounting plate length of approximately 10 inches.

33. As shown in Annotated Fig. 3 of Exhibit Shuttleslide 1012 a swivel element is disclosed by the Grady-White Pivoting Trolling Motor Mount.

34. As can be seen in Annotated Fig. 3 of Exhibit Shuttleslide 1012, the first faces of the support plate and the elongate mounting plate are parallel.
35. As can be seen in Annotated Fig. 3 of Exhibit Shuttleslide 1012, the swivel element, the support plate, and the elongated mounting plate at least partially overlap each other.
36. Fig. 1 of Exhibit Shuttleslide 1012 depicts the Grady-White Pivoting Trolling Motor Mount in a first position.
37. Fig. 6 of Exhibit Shuttleslide 1012 depicts the Grady-White Pivoting Trolling Motor Mount in a second position.
38. Annotated Fig. 2 of Exhibit Shuttleslide 1012 depicts the swivel axis of the Grady-White Pivoting Trolling Motor Mount.
39. Annotated Fig. 2 of Exhibit Shuttleslide 1012 depicts the widthwise center line of the elongated mounting plate of the Grady-White Pivoting Trolling Motor Mount.
40. The elongated mounting plate swivels about an axis that is perpendicular to and passing through the first face of the elongated mounting plate at a point spaced from a widthwise center line of the elongated mounting plate to move from the first position to the second position.
41. As shown in annotated Figs. 3 & 4 of Exhibit Shuttleslide 1012, a locking pin for securing the elongated mounting plate in a set position relative to the support

plate when the swivel element, the support plate, and the elongated mounting plate are coupled together is disclosed by the Grady-White Pivoting Trolling Motor Mount.

42. Annotated Fig. 2 of Exhibit Shuttleslide 1012 depicts a first portion of the elongated mounting plate for overlapping with the swivel element and the support plate when the swivel element, the support plate, and the elongated mounting plate are coupled together.

43. Annotated Fig. 2 of Exhibit Shuttleslide 1012 depicts a second portion of the elongated mounting plate cantilevered from the first portion when the swivel element, the support plate, and the elongated mounting plate are coupled together.

44. Annotated Fig. 2 of Exhibit Shuttleslide 1012 depicts a plurality of holes in the second portion of the elongated mounting plate for receiving a plurality of bolts to secure an object to the second portion of the elongated mounting plate.

45. As shown in Annotated Fig. 2 of Exhibit Shuttleslide 1012, bolts are carried by the plurality of holes to secure a trolling motor to the elongated mounting plate.

46. As can be seen in at least Fig. 1 of Ex. Shuttleslide1012, a boat is disclosed in the Grady-White Pivoting Trolling Motor Mount.

47. At least Figs. 1 and 3 of Ex. Shuttleslide1012 depict gunnels.

48. As can be seen in Annotated Fig. 3 of Ex. Shuttleslide1012 a swivel mount disposed above an upward facing surface of the gunnel such that a mounting member

of the swivel mount is able to swivel about an axis that is perpendicular to and passes through the upward facing surface of the gunnel is disclosed by the Grady-White Pivoting Trolling Motor Mount.

49. Fig. 1 of Exhibit Shuttleslide 1012 depicts the swivel mount in a first position and Fig. 6 of Exhibit Shuttleslide 1012 depicts the swivel mount in a second position.

50. The mounting member of the swivel mount swivels about an axis perpendicular to and passing through the upward facing surface of the gunnel to move between the first and second positions.

51. As shown in annotated Fig. 5 of Ex. Shuttleslide1012, a support member of the swivel mount, which is fastened to the upward facing surface of the gunnel via one or more bolts or screws through the upward facing surface of the gunnel is disclosed by the Grady-White Pivoting Trolling Motor Mount.

52. As shown in annotated Fig. 2 of Ex. Shuttleslide1012, a trolling motor mounting bracket coupled to an upward facing surface of the mounting member is disclosed by the Grady-White Pivoting Trolling Motor Mount.

53. Annotated Fig. 5 of Exhibit Shuttleslide 1012 depicts a base member adhered to the upward facing surface of the gunnel under the mounting member.

54. Fig. 5 of Exhibit Shuttleslide 1012 depicts an upward facing surface of a gunnel having a width greater than 4 inches.

**II. Claim 5 is Unpatentable as Obvious Under 35 U.S.C § 103 based
on Gillespie in view of U.S. Patent No. 11,584,495 to Hunziker
(hereinafter “Hunziker”)**

55. Both Gillespie and Hunziker relate to the field of securing an accessory to a boat gunnel.

56. A person having ordinary skill in the art reading Gillespie would have been motivated to follow the teachings of Hunziker to modify the mounting apparatus disclosed by Gillespie to include the plurality of holes disclosed by Hunziker in the downrigger mount disclosed by Hunziker to allow for mounting an object other than a downrigger to a gunnel because it was known in the art that trolling motors, downriggers, and other accessories could be mounted to gunnels.

57. It would have been obvious at the time of the invention to combine the elongated mounting plate of Gillespie with the plurality of holes for receiving a plurality of bolts to secure an object to the second portion of the elongated mounting plate of Hunziker.

**III. Claim 6 is Unpatentable as Obvious Under 35 U.S.C. § 103 based
on Gillespie in view of Hunziker in further view of Universal
Mounting Plate**

58. The Universal Fit Mounting Plate is sold by a marine supply company.

59. The Universal Fit Mounting Plate is advertised to fit most brands and models of radars. (Ex. Shuttleslide1010). Universal mounts, such as the Universal Fit Mounting Plate were well known to those having ordinary skill in the art of marine accessories.

60. There would have been a motivation to combine Universal Mounting Plate with the disclosures of Gillespie and Hunziker with a reasonable expectation of success because similar marine accessories could be made by multiple manufacturers, and it was well known to create “universal” accessories that allow for the mounting of different brands of accessories.

61. It would have been obvious at the time of the invention to combine the number and arrangement of the plurality of holes such that different types of accessories can be secured with the disclosures of Hunziker and Gillespie to provide a universal trolling motor mount.

IV. Claim 7 is Unpatentable as Obvious Under 35 U.S.C. § 103 based on Gillespie in view of Gratsch

62. A person having ordinary skill in the art reading Gillespie would have been motivated to follow the teachings of Gratsch to modify the mounting apparatus disclosed by Gillespie to include the sliding track disclosed by Gratsch to allow for mounting an object other than a downrigger to a gunnel because it was known in the

art that trolling motors, downriggers, and other accessories could be mounted to gunnels.

63. It would have been obvious at the time of the invention to combine the elongated mounting plate of Gillespie with the sliding track of Gratsch to secure an object to the second portion of the elongated mounting plate of Gillespie.

V. Claim 8 is Unpatentable as Obvious Under 35 U.S.C. § 103 based on Gratsch in view of Leiss

64. A person having ordinary skill in the art reading Gratsch would have been motivated to follow the teachings of Leiss to secure the swivel mount of Gratsch to the top of the gunnel.

65. It would have been obvious at the time of the invention to combine the plank means and bolts of Leiss with the swivel mount of Gratsch.

VI. Claim 8 is Unpatentable as Obvious Under 35 U.S.C. § 103 based on by U.S. Patent No. 4,044,489 to Henze et al. in view of Leiss

66. A person having ordinary skill in the art reading Henze would have been motivated to follow the teachings of Leiss to secure the trolling motor mount of Leiss to the swivel mount on top of the gunnel disclosed by Henze.

67. Henze discloses a boat having gunnels. Gunnels can be seen extending from the bow to the stern of the boat depicted in both FIGS. 7 and 8.

68. As shown in FIG. 8, the trolling apparatus 10 is mounted above the upward facing surface of the gunnel.

69. The location on the boat at which the trolling apparatus are mounted in FIG. 8 of Henze are the gunnels of the boat.

70. It would have been obvious at the time of the invention to combine the trolling motor mounting bracket of Leiss with the swivel mount of Henze.

VII. Claim 8 is Unpatentable as Obvious Under 35 U.S.C. § 103 based on Henze in view of Gratsch

71. A person having ordinary skill in the art reading Henze would have been motivated to follow the teachings of Gratsch to secure the trolling motor mount of Gratsch to the swivel mount on top of the gunnel disclosed by Henze.

72. Henze discloses a boat having gunnels. Gunnels can be seen extending from the bow to the stern of the boat depicted in both FIGS. 7 and 8.

73. As shown in FIG. 8, the trolling apparatus 10 is mounted above the upward facing surface of the gunnel.

74. The location on the boat at which the trolling apparatus are mounted in FIG. 8 of Henze are the gunnels of the boat.

75. It would have been obvious at the time of the invention to combine the trolling motor mounting bracket of Gratsch with the swivel mount of Henze.

**VIII. Claim 9 is unpatentable as obvious under 35 U.S.C. § 103 based on
Leiss in view of U.S. Patent No. 3,999,500 to Friedel et al.**

76. A person having ordinary skill in the art reading Leiss would have been motivated to follow the teachings of Friedel to include a reinforcement member to an underside surface of the gunnel.

77. It would have been obvious at the time of the invention to combine the swivel mount of Leiss with the reinforcement member of Friedel.

**IX. Claim 9 is unpatentable as obvious under 35 U.S.C. § 103 based
on Gratsch in view of Leiss in further view of Friedel.**

78. A person having ordinary skill in the art reading Leiss and Gratsch would have been motivated to follow the teachings of Friedel to include a reinforcement member to an underside surface of the gunnel.

79. It would have been obvious at the time of the invention to combine the support member of Leiss with the reinforcement member of Friedel.

**X. Claim 9 is unpatentable as obvious under 35 U.S.C. § 103 based on
Henze in view of Leiss in further view of Friedel.**

80. A person having ordinary skill in the art reading Leiss and Henze would have been motivated to follow the teachings of Friedel to include a reinforcement member to an underside surface of the gunnel.

81. It would have been obvious at the time of the invention to combine the support member of Henze with the reinforcement member of Friedel.

XI. Claim 9 is unpatentable as obvious under 35 U.S.C. § 103 based on Henze in view of Gratsch in further view of Friedel.

82. A person having ordinary skill in the art reading Leiss and Henze would have been motivated to follow the teachings of Friedel to include a reinforcement member to an underside surface of the gunnel.

83. It would have been obvious at the time of the invention to combine the support member of Henze with the reinforcement member of Friedel.

XII. Claims 11 and 12 are unpatentable as obvious under 35 U.S.C. § 103 based on Leiss in view of common knowledge of one skilled in the art

84. At the time the application was filed, boats with gunnels having upward facing surfaces of a width greater than 4 inches were well known in the art.

85. At the time the application was filed, saltwater fishing boats were also well known in the art.

86. At the time the application was file, it was also well known to mount trolling motors on saltwater fishing boats.

87. There would have been a motivation to combine Leiss and the common knowledge of one with skill in the art with a reasonable expectation of success

because it was well known that trolling motors could be mounted to boats with gunnels greater than four inches.

88. There would also have been a motivation to combine Leiss and the common knowledge of one with skill in the art with a reasonable expectation of success because it was well known that trolling motors could be mounted on saltwater fishing boats.

89. Leiss discloses a gunnel but is silent as to the width of the gunnel. However, at the time of filing the application, it was common knowledge to one with skill in the art that a gunnel may have a width greater than 4 inches.

90. It would have been obvious at the time of the invention to combine the gunnel of Leiss with any gunnel width that was commonly known to one with skill in the art.

91. Leiss discloses a fishing boat but is silent as to whether the boat is a saltwater fishing boat. However, at the time of filing the application, it was common knowledge to one with skill in the art that a trolling motors may be mounted to saltwater fishing boats.

92. It would have been obvious at the time of the invention to combine the fishing boat of Leiss with a saltwater fishing boat that was commonly known to one with skill in the art.

**XIII. Claims 11-12 are unpatentable as obvious under 35 U.S.C. § 103
based on Gratsch in view of Leiss in further view of common
knowledge of one skilled in the art**

93. There would have been a motivation to combine Gratsch and Leiss and the common knowledge of one with skill in the art with a reasonable expectation of success because it was well known that trolling motors could be mounted to boats with gunnels greater than four inches.

94. There would also have been a motivation to combine Gratsch and Leiss and the common knowledge of one with skill in the art with a reasonable expectation of success because it was well known that trolling motors could be mounted on saltwater fishing boats.

95. Leiss and Gratsch are silent as to the width of the gunnel. However, at the time of filing the application, it was common knowledge to one with skill in the art that a gunnel may have a width greater than 4 inches.

96. It would have been obvious at the time of the invention to combine the gunnels of Gratsch and Leiss with any gunnel width that was commonly known to one with skill in the art.

97. However, at the time of filing the application, it was common knowledge to one with skill in the art that trolling motors could be mounted to saltwater fishing boats.

98. It would have been obvious at the time of the invention to mount a trolling motor on any saltwater fishing boat that was commonly known to one with skill in the art.

XIV. Claims 11 and 12 are unpatentable as obvious under 35 U.S.C. § 103 based on Henze in view of Leiss in further view of common knowledge of one skilled in the art

99. There would have been a motivation to combine Henze and Leiss and the common knowledge of one with skill in the art with a reasonable expectation of success because it was well known that trolling motors could be mounted to boats with gunnels greater than four inches.

100. There would also have been a motivation to combine Henze and Leiss and the common knowledge of one with skill in the art with a reasonable expectation of success because it was well known that trolling motors could be mounted on saltwater fishing boats.

101. Henze and Leiss are silent as to the width of the gunnel. However, at the time of filing the application, it was common knowledge to one with skill in the art that a gunnel may have a width greater than 4 inches.

102. It would have been obvious at the time of the invention to combine the gunnels of Henze and Leiss with any gunnel width that was commonly known to one with skill in the art.

103. Henze and Leiss are silent as to whether the boat is a saltwater fishing boat. However, at the time of filing the application, it was common knowledge to one with skill in the art that a trolling motor could be mounted to a saltwater fishing boat.

104. It would have been obvious at the time of the invention to combine the trolling motor mount with a saltwater fishing boat that was commonly known to one with skill in the art.

XV. Claims 11 and 12 are unpatentable as obvious under 35 U.S.C. § 103 based on Henze in view of Gratsch in further view of common knowledge of one skilled in the art

105. There would have been a motivation to combine Henze and Gratsch and the common knowledge of one with skill in the art with a reasonable expectation of success because it was well known that trolling motors could be mounted to boats with gunnels greater than four inches.

106. There would also have been a motivation to combine Henze and Gratsch and the common knowledge of one with skill in the art with a reasonable expectation of success because it was well known that trolling motors could be mounted on saltwater fishing boats.

107. Henze and Gratsch are silent as to the width of the gunnel. However, at the time of filing the application, it was common knowledge to one with skill in the art that a gunnel may have a width greater than 4 inches.

108. It would have been obvious at the time of the invention to combine the gunnels of Henze and Gratsch with any gunnel width that was commonly known to one with skill in the art.

109. Henze and Gratsch are silent as to whether the disclosed boat is a saltwater fishing boat. However, at the time of filing the application, it was common knowledge to one with skill in the art that trolling motors could be mounted to saltwater fishing boats.

110. It would have been obvious at the time of the invention to combine the trolling motor mount with a saltwater fishing boat that was commonly known to one with skill in the art.

XVI. Claim 14 is unpatentable as obvious under 35 U.S.C. § 103 based on Leiss in view of Hunziker

111. A person having ordinary skill in the art reading Leiss would have been motivated to follow the teachings of Hunziker to include a quick release feature.

112. It would have been obvious at the time of the invention to combine the trolling motor mounting bracket of Leiss with the quick-release mounting bracket of Hunziker.

XVII. Claim 14 is unpatentable as obvious under 35 U.S.C. § 103 based on Gratsch in view of Leiss in further view of Hunziker

113. A person having ordinary skill in the art reading Leiss and Gratsch would have been motivated to follow the teachings of Hunziker to include a quick release feature.

114. It would have been obvious at the time of the invention to combine the trolling motor mounting bracket of Gratsch with the quick-release mounting bracket of Hunziker.

XVIII. Claim 14 is unpatentable as obvious under 35 U.S.C. § 103 based on Henze in view of Leiss in further view of Hunziker

115. A person having ordinary skill in the art reading Leiss and Henze would have been motivated to follow the teachings of Hunziker to include a quick release feature.

116. It would have been obvious at the time of the invention to combine the trolling motor mounting bracket of Leiss with the quick-release mounting bracket of Hunziker.

XIX. Claim 14 is unpatentable as obvious under 35 U.S.C. § 103 based on Henze in view of Gratsch in further view of Hunziker

117. A person having ordinary skill in the art reading Henze and Gratsch would have been motivated to follow the teachings of Hunziker to include a quick release feature.

118. It would have been obvious at the time of the invention to combine the trolling motor mounting bracket of Gratsch with the quick-release mounting bracket of Hunziker.

**XX. Claims 15-18 are Obvious Under 35 USC 103 based on Gillespie
in view of Hunziker in further view of common knowledge of one
having skill in the art**

119. At the time the application was filed, it would have been obvious to one having skill in the art to include a hole pattern on the mounting plate to receive a known trolling motor.

120. A person having ordinary skill in the art reading Gillespie would have been motivated to follow the teachings of Hunziker to modify the mounting apparatus disclosed by Gillespie to include the plurality of holes disclosed by Hunziker in the downrigger mount disclosed by Hunziker to allow for mounting an object other than a downrigger to a gunnel because it was known in the art that trolling motors, downriggers, and other accessories could be mounted to gunnels.

121. A person with skill in the art would have known to make a hole pattern in a trolling motor mount that would fit known trolling motors.

122. It was well known to those with skill in the art that the hole configuration recited in this claim was required to mount a Move PV trolling motor available from

Power Pole, the RTA quick release inner plates available from Minn Kota ®, and 4 bolt pucks and 6 bolt pucks available from Rhodan.

123. It would have been obvious at the time of the invention to combine the elongated mounting plate of Gillespie with the hole configuration recited in claim 15.

124. It was well known to those with skill in the art that the hole configuration recited in this claim was required to mount inner plates for the Force® Kracken trolling motor available from Garmin®.

125. It would have been obvious at the time of the invention to combine the elongated mounting plate of Gillespie with the hole configuration recited in claim 16.

126. It was well known to those with skill in the art that the hole configuration recited in this claim was required to mount quick release pucks or inner plates of the Quest series of trolling motor available from Minn Kota®.

127. It would have been obvious at the time of the invention to combine the elongated mounting plate of Gillespie with the hole configuration recited in claim 17.

128. It was well known to those with skill in the art that the hole configuration recited in this claim was required to mount quick release pucks or inner plates of Move Offshore trolling motor available from Power Pole.

129. It would have been obvious at the time of the invention to combine the elongated mounting plate of Gillespie with the hole configuration recited in claim 18.

I hereby declare under penalty of perjury that all statements made herein of my own knowledge are true and correct and that all statements made on information and belief are believed to be true and correct; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Dated: 24/09/2025 _____, 2025

Russell Taylor
Russell Taylor (Sep 24, 2025 16:21:35 EMT)

Russell Taylor

Declaration_signature page_RTaylor

Final Audit Report

2025-09-24

Created:	2025-09-24
By:	Jill Lambdin (jill@uslegalteam.com)
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"Declaration_signature page_RTaylor" History

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-  Document emailed to Russell Taylor (russ.taylor@shuttleslide.com) for signature
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