

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

SEA SWIVEL INC., a Florida Corporation,

Plaintiff,

v.

RHODAN MARINE SYSTEMS OF  
FLORIDA, LLC, a Florida limited liability  
company, DREAM MACHINE &  
PROTOTYPING, LLC, d/b/a T/6 Marine  
and SHUTTLESLIDE LLC, a Florida  
limited liability company,

Defendants.

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**COMPLAINT FOR PATENT INFRINGEMENT AND DEMAND FOR A JURY TRIAL**

SEA SWIVEL INC. (“Plaintiff” or “Sea Swivel”), by its undersigned attorneys, brings this complaint for patent infringement against RHODAN MARINE SYSTEMS OF FLORIDA, LLC (“Rhodan”), DREAM MACHINE & PROTOTYPING, LLC d/b/a T/6 Marine (“T6”), and Shuttleslide LLC (“ShuttleSlide”)(collectively, “Defendants”), and hereby alleges as follows:

**NATURE OF THE ACTION**

1. Through this action, Sea Swivel seeks to put a stop to Defendants’ ongoing misappropriation of valuable intellectual property owned by Sea Swivel. Defendants are making, using, and offering to sell swiveling trolling motor mounts that brazenly infringe on Sea Swivel’s patent—reaping the rewards of innovation they neither conceived nor earned. As set forth more fully below, Sea Swivel demands not only damages, costs, and attorneys’ fees, but also permanent injunctive relief under the Patent Act, ensuring Defendants can no longer trade on the strength of Sea Swivel’s ingenuity.

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**EPGD ATTORNEYS AT LAW, P.A.**

777 SW 37<sup>th</sup> Ave., Ste. 510, Miami, Florida 33135 • T: (786) 837-6787 | F: (305) 718-0687 • www.epgdlaw.com

**THE PARTIES**

2. Sea Swivel is a corporation organized and existing under the laws of the State of Florida, having its principal place of business at 111 Bee Street, Tavernier, FL 33070.

3. Rhodan is a limited liability company organized and existing under the laws of the State of Florida, having its principal place of business at 1290 Sarasota Center Blvd, Sarasota, Florida 34240.

4. T6 is a limited liability company organized and existing under the laws of the State of Iowa, having its principal place of business at 21958 Ellington Avenue, Glenwood, Iowa 51534.

5. ShuttleSlide is a limited liability company organized and existing under the laws of the State of Florida, with its principal place of business at 1990 W. New Haven Avenue, Second Floor, Melbourne, Florida 32904.

**JURISDICTION AND VENUE**

6. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 100 *et seq.*, including §§ 271(a)-(c). This Court has subject matter jurisdiction over this controversy pursuant to 28 U.S.C. §§ 1331 and 1338.

7. Venue is proper pursuant to 28 U.S.C. § 1391 because a substantial part of the events or omissions giving rise to the claims occurred in this judicial district. Venue is also proper before this Court because at least one Defendant is subject to this Court's personal jurisdiction with respect to this action.

8. This Court has personal jurisdiction over Rhodan, T6, and ShuttleSlide because each Defendant has committed acts of patent infringement in the State of Florida and this judicial district.

9. Rhodan and ShuttleSlide are Florida entities, organized under the laws of Florida, and by virtue of, *inter alia*, their status as Florida companies, having availed themselves of the rights and benefits of Florida law, should reasonably anticipate being haled into court in this judicial district.

10. T6, while organized under the laws of Iowa, has purposefully directed infringing activities into Florida, including the marketing and sale of infringing products to Florida residents, and should likewise reasonably anticipate being haled into court in this judicial district.

### **FACTUAL BACKGROUND**

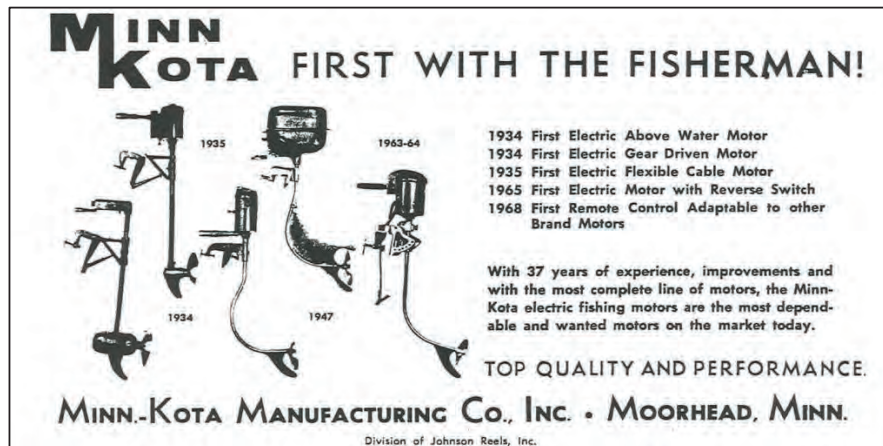
#### ***The Asserted Patent***

11. Born in the heart of the Upper Keys—the legendary “Fishing Capital of the World”—Sea Swivel launched in 2020 with a bold mission: to transform trolling motor technology. Its flagship innovation, the *Original Swivel Mount*, is the first heavy-duty, fully adjustable mount of its kind. With this breakthrough, Sea Swivel has raised the bar for performance, design, and safety, setting a new benchmark for anglers everywhere.

#### ***Evolution of the Trolling Motor***

12. In 1934 Mr. O.G. Schmidt, envisioned a new way of positioning his fishing boat with the first electric trolling motor for anglers. The creation of the electric trolling motor marked a new era in fishing, allowing anglers to navigate waters unlike ever before. Built from a Ford Model A starter motor in Fargo, North Dakota, Mr. O.G. Schmidt named the new company Minn Kota.

13. Between 1934 and 1968, Minn Kota developed several versions of the electric trolling motor. Throughout these changes, one thing remained constant: the mounting mechanism always relied on a tension clamp.



14. Traditionally, electric trolling motors have been mounted at the bow of the boat rather than the transom. Unlike transom-mounted motors, which push from behind, a bow-mounted trolling motor pulls the boat through the water. This pulling action gives anglers far greater steering precision and overall maneuverability.

**NEW  
AUTOPILOT.  
THE MOTOR  
THAT STEERS  
ITSELF.**

**A MINN-KOTA BREAKTHROUGH  
IN BOAT CONTROL.**

Point the AutoPilot motor in the direction you want to go. Then fish! AutoPilot steers automatically, corrects for wind and current, and holds the course you set. When it's time to turn, a touch of your toe on the MicroTouch foot pedal turns the AutoPilot left or right to the new direction and steers automatically. If you choose to change directions again.

**Great for trolling, or casting along a shoreline.**  
Flip the foot pedal's power switch to "Constant On." Turn the motor to your desired direction. And fish! You don't even have to wait for the boat to swing to the course. The AutoPilot will take care of it for you.

**Great for bass boat positioning.**  
With the power switch in the "momentary" position, AutoPilot corrects for boat drift even when the propeller isn't turning. So when you apply power, you'll know exactly way the boat is going to move. Want to change directions? Just steer. The new direction will be locked in.

Field testers tell us, "Once you fish with AutoPilot, you'll never go back to steering again!"

**Minn-Kota AutoPilot 865**

- 36 lbs. thrust
- Infinitely variable speeds
- MicroTouch remote control
- Maximum efficiency
- New TurboPower Motor (see next pages)
- Battery gauge lights

15. Using an electric trolling motor while beneficial to an angler in reaching precise locations, the method of stowing the long trolling motor shaft has long been problematic, even dangerous. The method of stowing and deploying a trolling motor typically entails, among other

things, the angler having to climb on top of the bow of the boat to disengage the trolling motor and then pull the motor shaft from the water which can reach up to 108 inches long. Once the trolling motor shaft was pulled from the water, the shaft would lay across the front bow of the boat which may cause injuries to the passengers onboard or damage the trolling motor itself.

***Innovation Meets Ingenuity – The Sea Swivel is Born***

16. The Sea Swivel solved the safety problems presented by fixed-mount trolling motors by providing a swiveling mounting plate compatible with leading manufacturer trolling motors that can be mounted to upward facing gunnel of the boat where an angler no longer needs to expose themselves to danger by boarding the bow of the boat to deploy or retract the trolling motor shaft—this ability allows the boater to *Swivel, Deploy, & Enjoy*.



17. The Sea Swivel rotating mount allows a trolling motor to pivot laterally without removing the mount from the deck, enabling users to redirect motor thrust and stow the motor without removal or disassembly. Each Sea Swivel product is manufactured and sold with specifications suitable for a wide range of vessels and use environments, including freshwater and saltwater settings.

18. The Sea Swivel is tremendously popular and is the market-leading trolling motor mount in the United States. The Sea Swivel has been picked up by some of the biggest names in the industry, including CWR Wholesale Electronics, West Marine, Wintron Electronics Wholesale, Boat Outfitters, Port Supply, and local dealers throughout the country.

19. Furthermore, the Sea Swivel has even become the standard trolling motor mount for several high-end boat manufacturers. The Sea Swivel has become known through the marine industry for safety, ease of use, and reliability.

#### **GENERAL ALLEGATIONS**

20. Sea Swivel as an innovator has made substantial investments in research and development, resulting in been awarded its' patent which covers the key functionality, safety, and performance features of the Sea Swivel being asserted against the Defendants U.S. Patent No. 12,258,111 (the '111 Patent").

21. The '111 Patent is valid, enforceable, and was duly issued on March 25, 2025, by the United States Patent and Trademark Office ("USPTO"). Sea Swivel is the assignee and owner of all right, title, and interest, including the right to recover damages for infringement, in the '111 Patent. A true and correct copy of which is attached hereto as **"Exhibit A"** and by reference incorporated herein.

**DEFENDANTS' INFRINGING ACTIVITIES**

22. Unfortunately, the success and popularity of Sea Swivel has resulted in imitation, copying, and unlawful piggybacking off of Sea Swivel's substantial investment in its intellectual property rights, including the '111 Patent.

**a. Defendant Rhodan's Infringing Activities.**

23. The "Rhodan Accused Products" are (a) the SRQ Brackets; and (b) any other trolling motor mounts, brackets, or systems sold or marketed by Rhodan on or since the issuance of the '111 Patent that incorporate rotating or pivoting mechanisms that facilitate secure attachment and directional adjustment of bow-mounted trolling motors in a manner materially similar to Sea Swivel's patented design.

**b. Defendant T6's Infringing Activities.**

24. The "T6 Accused Products" are (a) the BOSS 360, and Mini BOSS 360 trolling motor mounts sold or offered for sale by T6; and (b) any other trolling motor mounts, brackets, or systems sold or marketed by T6 on or since the issuance of the '111 Patent that incorporate rotating or pivoting mechanisms that facilitate secure attachment and directional adjustment of bow-mounted trolling motors in a manner materially similar to Sea Swivel's patented design.

**c. Defendant ShuttleSlide's Infringing Activities.**

25. The "ShuttleSlide Accused Products" are (a) the SS-7.5R Rotating Mount and SS-9.5R Rotating Mount, marketed and sold by ShuttleSlide; and (b) any other trolling motor mounts, brackets, or systems sold or marketed by Shuttle Slide on or since the issuance of the '111 Patent that incorporate rotating or pivoting mechanisms that facilitate secure attachment and directional adjustment of bow-mounted trolling motors in a manner materially similar to Sea Swivel's patented design.

26. Sea Swivel has undertaken its best efforts in good faith to identify and investigate the products that infringe the '111 Patent (collectively, the "'111 Accused Products").

27. However, many details regarding the specific design, dimensions, components, and internal mechanisms of the Accused Products are not publicly available or accessible without discovery. Sea Swivel has identified the Accused Products based on publicly available marketing materials, online product descriptions, photographs, and video demonstrations.

28. The Accused Products have been and continue to be marketed, offered for sale, and sold throughout the United States. These products are believed to infringe one or more claims of the '111 Patent based on their shared structural and functional characteristics, including mechanisms that allow for rotational movement or directional adjustment of trolling motors. While each product may vary in form or branding, they are substantially similar in purpose, configuration, and operation to Sea Swivel's patented rotating mount system and are therefore properly included within the scope of infringing Accused Products.

29. In addition, on information and belief, Defendants have represented to actual and potential customers, contractors, and end users that the Accused Products identified above are comparable to Sea Swivel's patented rotating mount system. These representations include claims that the Accused Products provide similar functionality, design benefits, or compatibility, despite infringing upon Sea Swivel's intellectual property.

**COUNT I – INFRINGEMENT OF THE '111 PATENT**  
**(As to Rhodan)**

30. Sea Swivel realleges and incorporates by reference the allegations in paragraphs 1–29 as if fully set forth herein.

31. Rhodan has made, used, imported, sold and/or offered for sale in the United States at least one product, including but not limited to the Rhodan Accused Products, that infringe the

'111 Patent. The Rhodan Accused Products, offered for sale and sold without license of Sea Swivel, are colorable imitations of the invention claimed in the '111 Patent.

32. Rhodan's infringement is detailed in the preliminary claim chart attached hereto as **Exhibit "B"** and incorporated herein by reference. **Exhibit B** shows that the appearance of the Rhodan Accused Products are substantially the same as that of the '111 Patent in the eye of an ordinary observer giving such attention as a purchaser usually gives to the non-functional ornamental design of the product, with such resemblance as to deceive an ordinary observer, inducing him or her to purchase the Rhodan Accused Products, supposing it to be the claimed design of the '111 Patent.

33. The Rhodan Accused Products are currently being offered for sale in the United States on [https://www.rhodanmarine.com/product/srq-brackets-sliding-rotating-quick-release/?srsltid=AfmBOop95fG9vDpEAn8\\_wT271q0dC7I48QwbwDpkqrqbNjYnkXBm4Pil](https://www.rhodanmarine.com/product/srq-brackets-sliding-rotating-quick-release/?srsltid=AfmBOop95fG9vDpEAn8_wT271q0dC7I48QwbwDpkqrqbNjYnkXBm4Pil), which provides pricing for the products, allows a consumer to purchase them, and includes images and/or videos showing an infringing use of the products. A copy of portions of the website showing the Rhodan Accused Products being made, used, and offered for sale in the United States is attached as **Exhibit "C"**.

34. Rhodan's infringement of the '111 Patent is knowing and willful. On information and belief, Rhodan received written notice of the '111 Patent and Sea Swivel's rights therein on June 25, 2025, via a letter enclosing copies of the '111 Patent (the "Rhodan June 25<sup>th</sup> Demand"). A true and correct copy of the Rhodan June 25<sup>th</sup> Demand is attached as **Exhibit "D"**. This Complaint further provides sufficient knowledge that any subsequent manufacture, use,

importation, offer for sale, or sale of the Rhodan Accused Products will constitute willful infringement of the '111 Patent<sup>1</sup>.

35. If Rhodan's infringing activities with respect to the Rhodan Accused Products are not enjoined, Sea Swivel will be irreparably harmed by being forced to compete with a product that infringes its own patent. An early injunction is also appropriate in this case because the infringing products are currently being sold in commerce.

36. Sea Swivel has already been damaged as a result of Rhodan's infringing activities and will continue to sustain damages in the future unless infringement of the '111 Patent is permanently enjoined by the Court. Such damages include lost profit, erosion of Sea Swivel's sales, and in any event no less than a reasonable royalty as set forth in 35 U.S.C. § 284.

**COUNT II – INFRINGEMENT OF THE '111 PATENT**  
**(As to T6)**

37. Sea Swivel realleges and incorporates by reference the allegations in paragraphs 1–29 as if fully set forth herein.

38. T6 has made, used, imported, sold and/or offered for sale in the United States at least one product, including but not limited to the T6 Accused Products, that infringe the '111 Patent. The T6 Accused Products, offered for sale and sold without license of Sea Swivel, are colorable imitations of the invention claimed in the '111 Patent.

39. T6's infringement is detailed in the preliminary claim chart attached hereto as **Exhibit "E"** and incorporated herein by reference. **Exhibit E** shows that the appearance of the Troll Mount Accused Products are substantially the same as that of the '111 Patent in the eye of

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<sup>1</sup> The SRQ Bracket was not available when the Rhodan June 25<sup>th</sup> Demand was sent and received. However, as of July 28, 2025, after the date of the Rhodan June 25<sup>th</sup> Demand, the SRQ Bracket was made available for purchase. See, SRQ Bracket (Sliding, Rotating, quick Release) <https://www.rhodanmarine.com/product/srq-brackets-sliding-rotating-quick-release/>

an ordinary observer giving such attention as a purchaser usually gives to the non-functional ornamental design of the product, with such resemblance as to deceive an ordinary observer, inducing him or her to purchase the Troll Mount Accused Products, supposing it to be the claimed design of the '111 Patent.

40. The T6 Accused Products are currently being offered for sale in the United States on <<https://www.t6marinesupply.com/category/trolling-motor-mounts>>, which provides pricing for the products, allows a consumer to purchase them, and includes images and/or videos showing an infringing use of the products. A copy of portions of the website showing the T6 Accused Products being made, used, and offered for sale in the United States is attached as **Exhibit "F"**.

41. T6's infringement of the '111 Patent is knowing and willful. On information and belief, T6 received written notice of the '111 Patent and Sea Swivel's rights therein on June 27, 2025, via a letter enclosing copies of the '111 Patent. A true and correct copy of this letter is attached as **Exhibit "G"**. This Complaint further provides sufficient knowledge that any subsequent manufacture, use, importation, offer for sale, or sale of the T6 Accused Products will constitute willful infringement of the '111 Patent.

42. If T6's infringing activities with respect to the T6 Accused Products are not enjoined, Sea Swivel will be irreparably harmed by being forced to compete with a product that infringes its own patent. An early injunction is also appropriate in this case because the infringing products are currently being sold in commerce.

43. Sea Swivel has already been damaged as a result of T6's infringing activities and will continue to sustain damages in the future unless infringement of the '111 Patent is permanently enjoined by the Court. Such damages include lost profits, erosion of Sea Swivel's sales, and in any event no less than a reasonable royalty as set forth in 35 U.S.C. § 284.

**COUNT III – INFRINGEMENT OF THE ‘111 PATENT**  
**(As to ShuttleSlide)**

44. Sea Swivel realleges and incorporates by reference the allegations in paragraphs 1–29 as if fully set forth herein.

45. ShuttleSlide has made, used, imported, sold and/or offered for sale in the United States at least one product, including but not limited to the ShuttleSlide Accused Products, that infringe the ‘111 Patent. The ShuttleSlide Accused Products, offered for sale and sold without license of Sea Swivel, are colorable imitations of the invention claimed in the ‘111 Patent.

46. ShuttleSlide’s infringement is detailed in the preliminary claim chart attached hereto as **Exhibit “K”** and incorporated herein by reference. **Exhibit K** shows the appearance of the ShuttleSlide Accused Products are substantially the same as that of the ‘111 Patent in the eye of an ordinary observer giving such attention as a purchaser usually gives to the non-functional ornamental design of the product, with such resemblance as to deceive an ordinary observer, inducing him or her to purchase the ShuttleSlide Accused Products, supposing it to be the claimed design of the ‘111 Patent.

47. The ShuttleSlide Accused Products are currently being offered for sale in the United States on <<https://shuttleslide.com/product/ss-7-5r>; <https://shuttleslide.com/product/ss-9-5r-rotating-mount/>>, which provides pricing for the products, allows a consumer to purchase them, and includes images and/or videos showing an infringing use of the products. A copy of portions of the website showing the ShuttleSlide Accused Products being made, used, and offered for sale in the United States is attached as **Exhibit “L”**.

48. ShuttleSlide’s infringement of the ‘111 Patent is knowing and willful. On information and belief, ShuttleSlide received written notice of the ‘111 Patent and Sea Swivel’s rights therein on June 25, 2025, via a letter enclosing copies of the ‘111 Patent. A true and correct

copy of this letter is attached as **Exhibit “M”**. This Complaint further provides sufficient knowledge that any subsequent manufacture, use, importation, offer for sale, or sale of the ShuttleSlide Accused Products will constitute willful infringement of the '111 Patent.

49. If ShuttleSlide's infringing activities with respect to the ShuttleSlide Accused Products are not enjoined, Sea Swivel will be irreparably harmed by being forced to compete with a product that infringes its own patent. An early injunction is also appropriate in this case because the infringing products are currently being sold in commerce.

50. Sea Swivel has already been damaged as a result of ShuttleSlide's infringing activities and will continue to sustain damages in the future unless infringement of the '111 Patent is permanently enjoined by the Court. Such damages include lost profit, erosion of Sea Swivel's sales, and in any event no less than a reasonable royalty as set forth in 35 U.S.C. § 284.

#### **RELIEF REQUESTED**

Sea Swivel respectfully requests the Court grant the following relief - in addition to all other available remedies at law and equity known and currently unknown - in light of the foregoing:

- A. That judgment be entered in favor of Sea Swivel and against Defendants for having infringed on the '111 Patent;
- B. A judgment that Defendants' infringement of the '111 Patent has been egregious and willful;
- C. An accounting for damages and judgment thereon under 35 U.S.C. § 284 resulting from Defendants' infringement of the '111 Patent including Sea Swivel's lost profits and/or Sea Swivel's damages arising from price erosion, but no less than a reasonable royalty, together with pre- and post-judgment interest and costs;

- D. A judgment in favor of Sea Swivel and against the Defendants in the amount of each individual Defendant's total profit on sales of the infringing product, as set forth in 35 U.S.C. § 289 and in light of the '111 Patent;
- E. That a preliminary and permanent injunction be issued against Defendants, its officers, employees, agents, servants, attorneys, instrumentalities, and those in privity with them, from infringing the claims of the '111 Patent, and for all further and proper injunctive relief pursuant to 35 U.S.C. § 283;
- F. Trebling of damages pursuant to 35 U.S.C. § 284 due to Defendants' egregious and willful infringement of the '111 Patent;
- G. That the Court find that this is an exceptional case within the meaning of 35 U.S.C. § 285;
- H. That this Court award Plaintiff its costs, expenses, and reasonable attorneys' fees and litigation expenses incurred in this action; and
- I. Such other and further relief as the Court deems just and proper.

**DEMAND FOR JURY TRIAL**

Sea Swivel elects a trial by jury of any issues and claims in this action to which it is entitled.

Dated: August 8, 2025.

Respectfully submitted,

**EPGD BUSINESS LAW P.A.**

*Attorneys for Plaintiff SEA SWIVEL INC.*

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BY: /s/Albert D. Sabater

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FL Bar No. 1051376

OSCAR A. GOMEZ, ESQ.

Fl Bar No: 58680

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.) **NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.**

**I. (a) PLAINTIFFS**

SEA SWIVEL INC.

**DEFENDANTS**

RHODAN MARINE SYSTEMS et al.

(b) County of Residence of First Listed Plaintiff  
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)

Attorneys (If Known)

Albert D. Sabater, Esq. 777 SW 37th Ave, Suite 510 Miami, FL 33135

(d) Check County Where Action Arose: ☒ MIAMI-DADE ☐ MONROE ☐ BROWARD ☐ PALM BEACH ☐ MARTIN ☐ ST. LUCIE ☐ INDIAN RIVER ☐ OKEECHOBEE ☐ HIGHLANDS

**II. BASIS OF JURISDICTION** (Place an "X" in one Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in one Box for Plaintiff and One Box for Defendant)

- |                                                   | PTF                        | DEF                        |                                                               | PTF                                   | DEF                        |
|---------------------------------------------------|----------------------------|----------------------------|---------------------------------------------------------------|---------------------------------------|----------------------------|
| <input type="checkbox"/> Citizen of This State    | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input checked="" type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| <input type="checkbox"/> Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5            | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country           | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation                                                | <input type="checkbox"/> 6            | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in one Box Only)

Click here for: [Nature of Suit Code Descriptions](#)

| CONTRACT                                                                          | TORTS                                                           | FORFEITURE/PENALTY                                                       | BANKRUPTCY                                                             | OTHER STATUTES                                                                                |
|-----------------------------------------------------------------------------------|-----------------------------------------------------------------|--------------------------------------------------------------------------|------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|
| <input type="checkbox"/> 110 Insurance                                            | <b>PERSONAL INJURY</b>                                          | <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 | <input type="checkbox"/> 422 Appeal 28 USC 158                         | <input type="checkbox"/> 375 False Claims Act                                                 |
| <input type="checkbox"/> 120 Marine                                               | <input type="checkbox"/> 310 Airplane                           | <input type="checkbox"/> 690 Other                                       | <input type="checkbox"/> 423 Withdrawal 28 USC 157                     | <input type="checkbox"/> 376 Qui Tam (31 USC 3729(e))                                         |
| <input type="checkbox"/> 130 Miller Act                                           | <input type="checkbox"/> 315 Airplane Product Liability         |                                                                          |                                                                        | <input type="checkbox"/> 400 State Reapportionment                                            |
| <input type="checkbox"/> 140 Negotiable Instrument                                | <input type="checkbox"/> 320 Assault, Libel & Slander           | <input type="checkbox"/> 365 Personal Injury - Product Liability         | <b>INTELLECTUAL PROPERTY RIGHTS</b>                                    | <input type="checkbox"/> 410 Antitrust                                                        |
| <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment    | <input type="checkbox"/> 330 Federal Employers' Liability       | <input type="checkbox"/> 367 Health Care/ Pharmaceutical                 | <input type="checkbox"/> 820 Copyrights                                | <input type="checkbox"/> 430 Banks and Banking                                                |
| <input type="checkbox"/> 151 Medicare Act                                         | <input type="checkbox"/> 340 Marine                             | <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability  | <input checked="" type="checkbox"/> 830 Patent                         | <input type="checkbox"/> 450 Commerce                                                         |
| <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) |                                                                 |                                                                          | <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application | <input type="checkbox"/> 460 Deportation                                                      |
| <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits        | <input type="checkbox"/> 345 Marine Product Liability           | <b>LABOR</b>                                                             | <input type="checkbox"/> 840 Trademark                                 | <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations                   |
| <input type="checkbox"/> 160 Stockholders' Suits                                  | <input type="checkbox"/> 350 Motor Vehicle                      | <input type="checkbox"/> 710 Fair Labor Standards Acts                   | <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016          | <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)                            |
| <input type="checkbox"/> 190 Other Contract                                       | <input type="checkbox"/> 355 Motor Vehicle Product Liability    | <input type="checkbox"/> 720 Labor/Mgmt. Relations                       | <b>SOCIAL SECURITY</b>                                                 | <input type="checkbox"/> 485 Telephone Consumer Protection Act (TCPA)                         |
| <input type="checkbox"/> 195 Contract Product Liability                           | <input type="checkbox"/> 360 Other Personal Injury              | <input type="checkbox"/> 740 Railway Labor Act                           | <input type="checkbox"/> 861 HIA (1395ff)                              | <input type="checkbox"/> 490 Cable/Sat TV                                                     |
| <input type="checkbox"/> 196 Franchise                                            | <input type="checkbox"/> 362 Personal Injury - Med. Malpractice | <input type="checkbox"/> 751 Family and Medical Leave Act                | <input type="checkbox"/> 862 Black Lung (923)                          | <input type="checkbox"/> 850 Securities/Commodities/Exchange                                  |
|                                                                                   |                                                                 | <input type="checkbox"/> 790 Other Labor Litigation                      | <input type="checkbox"/> 863 DIWC/DIWW (405(g))                        | <input type="checkbox"/> 890 Other Statutory Actions                                          |
|                                                                                   |                                                                 | <input type="checkbox"/> 791 Employee Retirement Income Security Act     | <input type="checkbox"/> 864 SSID Title XVI                            | <input type="checkbox"/> 891 Agricultural Acts                                                |
| <b>REAL PROPERTY</b>                                                              | <b>CIVIL RIGHTS</b>                                             | <b>PRISONER PETITIONS</b>                                                |                                                                        | <input type="checkbox"/> 893 Environmental Matters                                            |
| <input type="checkbox"/> 210 Land Condemnation                                    | <input type="checkbox"/> 440 Other Civil Rights                 | <b>Habeas Corpus:</b>                                                    |                                                                        | <input type="checkbox"/> 895 Freedom of Information Act                                       |
| <input type="checkbox"/> 220 Foreclosure                                          | <input type="checkbox"/> 441 Voting                             | <input type="checkbox"/> 463 Alien Detainee                              | <b>IMMIGRATION</b>                                                     | <input type="checkbox"/> 896 Arbitration                                                      |
| <input type="checkbox"/> 230 Rent Lease & Ejectment                               | <input type="checkbox"/> 442 Employment                         | <input type="checkbox"/> 510 Motions to Vacate Sentence                  | <input type="checkbox"/> 462 Naturalization Application                | <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision |
| <input type="checkbox"/> 240 Torts to Land                                        | <input type="checkbox"/> 443 Housing/ Accommodations            | <input type="checkbox"/> 530 General                                     | <input type="checkbox"/> 465 Other Immigration Actions                 | <input type="checkbox"/> 950 Constitutionality of State Statutes                              |
| <input type="checkbox"/> 245 Tort Product Liability                               | <input type="checkbox"/> 445 Amer. w/Disabilities - Employment  | <input type="checkbox"/> 535 Death Penalty                               |                                                                        |                                                                                               |
| <input type="checkbox"/> 290 All Other Real Property                              | <input type="checkbox"/> 446 Amer. w/Disabilities - Other       | <b>Other:</b>                                                            |                                                                        |                                                                                               |
|                                                                                   | <input type="checkbox"/> 448 Education                          | <input type="checkbox"/> 540 Mandamus & Other                            |                                                                        |                                                                                               |
|                                                                                   |                                                                 | <input type="checkbox"/> 550 Civil Rights                                |                                                                        |                                                                                               |
|                                                                                   |                                                                 | <input type="checkbox"/> 555 Prison Condition                            |                                                                        |                                                                                               |
|                                                                                   |                                                                 | <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement  |                                                                        |                                                                                               |

**V. ORIGIN**

(Place an "X" in one Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Re-filed (See VI below) ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation Transfer ☐ 7 Appeal to District Judge from Magistrate Judgment ☐ 8 Multidistrict Litigation - Direct File ☐ 9 Remanded from Appellate Court

**VI. RELATED/ RE-FILED CASE(S)**

(See instructions): a) Re-filed Case ☐ YES ☐ NO b) Related Cases ☐ YES ☒ NO

JUDGE:

DOCKET NUMBER:

**VII. CAUSE OF ACTION** 35 U.S.C. Section 271

Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity):

LENGTH OF TRIAL via days estimated (for both sides to try entire case)

**VIII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$ TBD

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE

DATE

SIGNATURE OF ATTORNEY OF RECORD

08/08/2025

/s/ Albert

Sabater

FL Bar No.: 1051376

FOR OFFICE USE ONLY - RECEIVED #

ASSISTANT

FILED

JUDGE

CLERK/JUDGE

## INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

### Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

**I. (a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official giving both name and title.

**(b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

**(c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

**II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.C.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.  
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.  
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.  
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked. Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; federal question actions take precedence over diversity cases.)

**III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

**IV. Nature of Suit.** Nature of Suit. Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).

**V. Origin.** Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.

Refiled (3) Attach copy of Order for Dismissal of Previous case. Also complete VI.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge's decision.

Remanded from Appellate Court. (8) Check this box if remanded from Appellate Court.

**VI. Related/Refiled Cases.** This section of the JS 44 is used to reference related pending cases or re-filed cases. Insert the docket numbers and the corresponding judges name for such cases.

**VII. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553

Brief Description: Unauthorized reception of cable service

**VIII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.

Demand. In this space enter the dollar amount (in thousands of dollars) being demanded or indicate other demand such as a preliminary injunction.

Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

**Date and Attorney Signature.** Date and sign the civil cover sheet.

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

SEA SWIVEL INC., a Florida Corporation,

Plaintiff(s)

V.

RHODAN MARINE SYSTEMS OF  
FLORIDA, LLC; DREAM MACHINE &  
PROTOTYPING, LLC; MM 50 INC.; and Shuttleslide  
LLC

Defendant(s)

Civil Action No. 1:25-cv-23581

## SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) DREAM MACHINE & PROTOTYPING, LLC  
21958 Ellington Avenue  
Glenwood, Iowa 51534

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff’s attorney, whose name and address are:

ALBERT D. SABATER, ESQ.  
777 SW 37th Ave, Suite 510  
Miami, FL 33135  
E: albert@epgdlaw.com  
E: oscar@epgdlaw.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: \_\_\_\_\_

Signature of Clerk or Deputy Clerk

Civil Action No. 1:25-cv-23581

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the summons unexecuted because \_\_\_\_\_; or

☐ Other *(specify)*:

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

**Print**

**Save As**

**Reset**

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

SEA SWIVEL INC., a Florida Corporation,

Plaintiff(s)

v.

RHODAN MARINE SYSTEMS OF  
FLORIDA, LLC; DREAM MACHINE &  
PROTOTYPING, LLC; MM 50 INC.; and Shuttleslide  
LLC

Defendant(s)

Civil Action No. 1:25-cv-23581

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) RHODAN MARINE SYSTEMS OF FLORIDA, LLC  
c/o AMBLER, LINDSAY  
1290 Sarasota Center Blvd  
SARASOTA, FL 34240

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

ALBERT D. SABATER, ESQ.  
777 SW 37th Ave, Suite 510  
Miami, FL 33135  
E: albert@epgdllaw.com  
E: oscar@epgdllaw.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: \_\_\_\_\_

\_\_\_\_\_  
Signature of Clerk or Deputy Clerk

Civil Action No. 1:25-cv-23581

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the summons unexecuted because \_\_\_\_\_; or

☐ Other *(specify)*:

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

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**Reset**

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

SEA SWIVEL INC., a Florida Corporation,

Plaintiff(s)

v.

RHODAN MARINE SYSTEMS OF  
FLORIDA, LLC; DREAM MACHINE &  
PROTOTYPING, LLC; MM 50 INC.; and Shuttleslide  
LLC

Defendant(s)

Civil Action No. 1:25-cv-23581

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) MM 50 INC.  
c/o MCGINNIS, BRETT K  
54 N SAINT ANDREWS DR  
ORMOND BEACH, FL 32174

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

ALBERT D. SABATER, ESQ.  
777 SW 37th Ave, Suite 510  
Miami, FL 33135  
E: albert@epgdlaw.com  
E: oscar@epgdlaw.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: \_\_\_\_\_

\_\_\_\_\_  
Signature of Clerk or Deputy Clerk

Civil Action No. 1:25-cv-23581

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the summons unexecuted because \_\_\_\_\_; or

☐ Other *(specify)*:

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

**Print**

**Save As**

**Reset**

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

SEA SWIVEL INC., a Florida Corporation,

Plaintiff(s)

v.

RHODAN MARINE SYSTEMS OF  
FLORIDA, LLC; DREAM MACHINE &  
PROTOTYPING, LLC; MM 50 INC.; and Shuttleslide  
LLC

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) SHUTTLESLIDE LLC  
c/o Bouvier & Associates CPAs  
3210 N Wickham Rd, Suite 5  
Melbourne, FL 32935

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

ALBERT D. SABATER, ESQ.  
777 SW 37th Ave, Suite 510  
Miami, FL 33135  
E: albert@epgdllaw.com  
E: oscar@epgdllaw.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: \_\_\_\_\_

\_\_\_\_\_  
Signature of Clerk or Deputy Clerk

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
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\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the summons unexecuted because \_\_\_\_\_; or

☐ Other *(specify)*:

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

**Print**

**Save As**

**Reset**



US012258111B1

(12) **United States Patent**  
**Berta, Jr.**

(10) **Patent No.:** **US 12,258,111 B1**  
(45) **Date of Patent:** **Mar. 25, 2025**

(54) **SWIVEL MOUNTS FOR ATTACHING AND MANEUVERING ACCESSORIES OVER THE GUNNEL OF A BOAT OR ANY OTHER MOUNTING SURFACE**

(71) Applicant: **Sea Swivel Inc.**, Key Largo, FL (US)

(72) Inventor: **Mark S. Berta, Jr.**, Key Largo, FL (US)

(73) Assignee: **Sea Swivel Inc.**, Key Largo, FL (US)

(\*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 0 days.

(21) Appl. No.: **18/897,527**

(22) Filed: **Sep. 26, 2024**

**Related U.S. Application Data**

(60) Provisional application No. 63/540,483, filed on Sep. 26, 2023.

(51) **Int. Cl.**  
**B63H 20/06** (2006.01)  
**B63H 20/00** (2006.01)

(52) **U.S. Cl.**  
CPC ..... **B63H 20/06** (2013.01); **B63H 20/007** (2013.01)

(58) **Field of Classification Search**  
None  
See application file for complete search history.

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*Primary Examiner* — Steven M Marsh

(74) *Attorney, Agent, or Firm* — Egan, Enders & Huston LLP.

(57) **ABSTRACT**

Swivel mounts, mounting assemblies for boating accessories, and boats having such are disclosed. The swivel mounts include a support member, a mounting member, and a swivel element for enabling the mounting member to swivel relative to the support member. In some cases, a trolling motor mount bracket and/or a trolling motor may be coupled to the swivel mount. In further embodiments, the swivel mount may be coupled to a surface of a boat, such as but not limited to a boat gunnel. In particular, a swivel mount may be configured and 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. Mounting members having a hole pattern to accommodate different types of trolling motors is also provided.

**18 Claims, 10 Drawing Sheets**

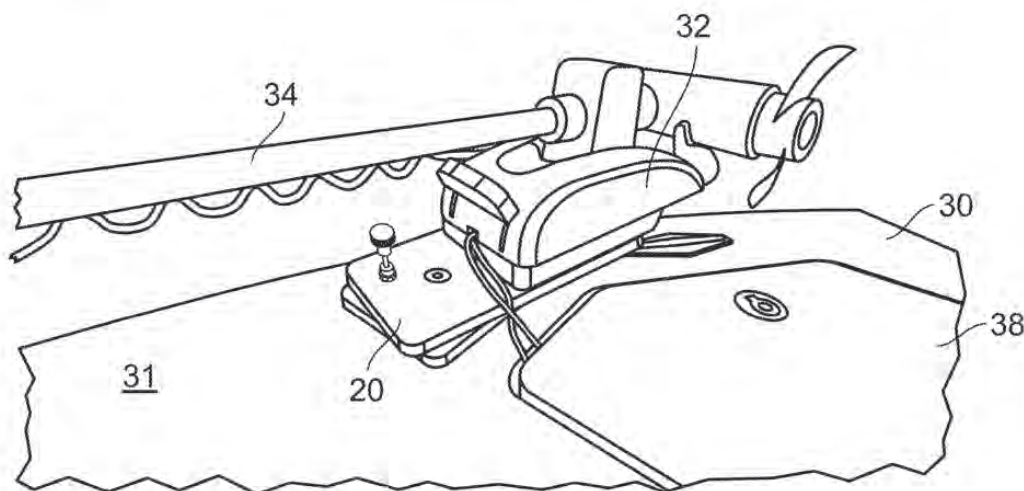


EXHIBIT A

**US 12,258,111 B1**

Page 2

(56)

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| 2023/0356807 | A1   | 11/2023 | Ratzlaff     |       |              |

\* cited by examiner

EXHIBIT A

U.S. Patent

Mar. 25, 2025

Sheet 1 of 10

US 12,258,111 B1

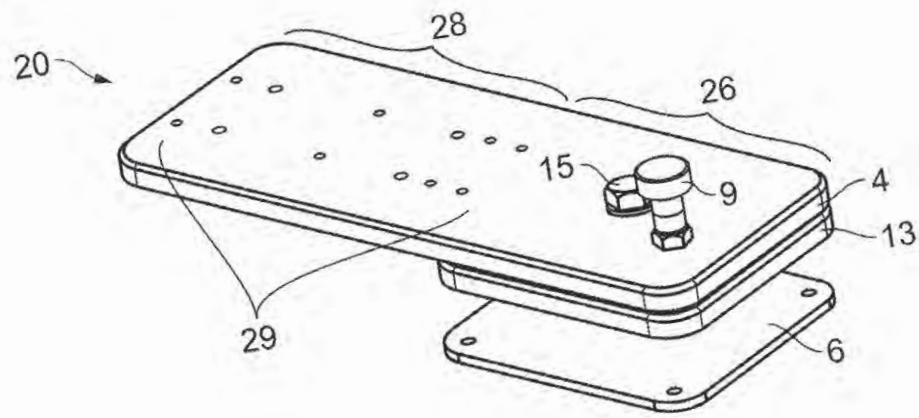


FIG. 1

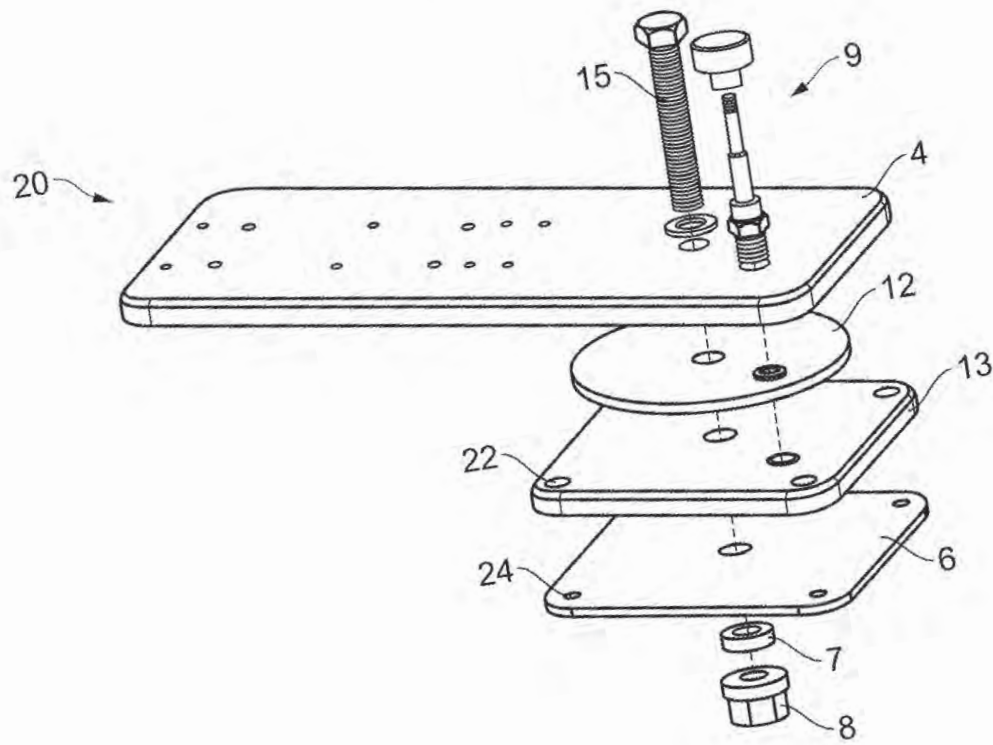


FIG. 2

EXHIBIT A

**U.S. Patent**

**Mar. 25, 2025**

**Sheet 2 of 10**

**US 12,258,111 B1**

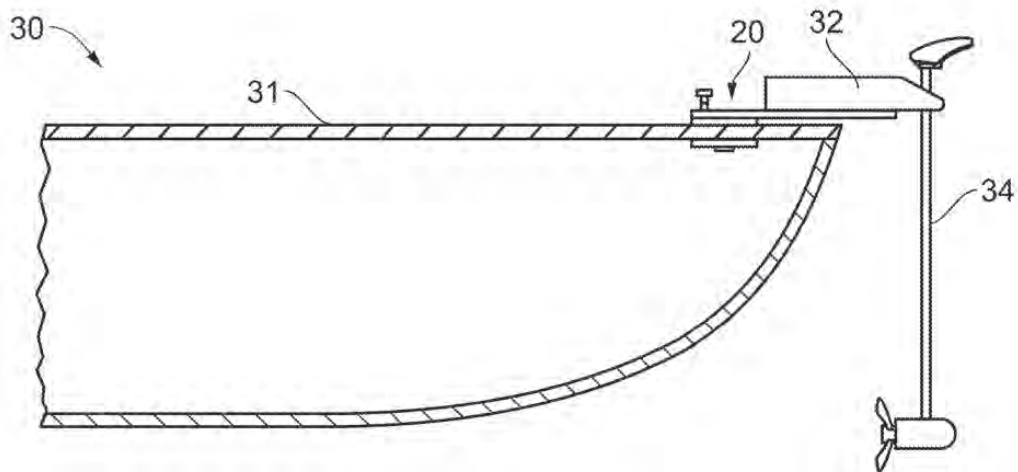


**FIG. 3**

EXHIBIT A

**U.S. Patent**

Mar. 25, 2025

Sheet 3 of 10

**US 12,258,111 B1**

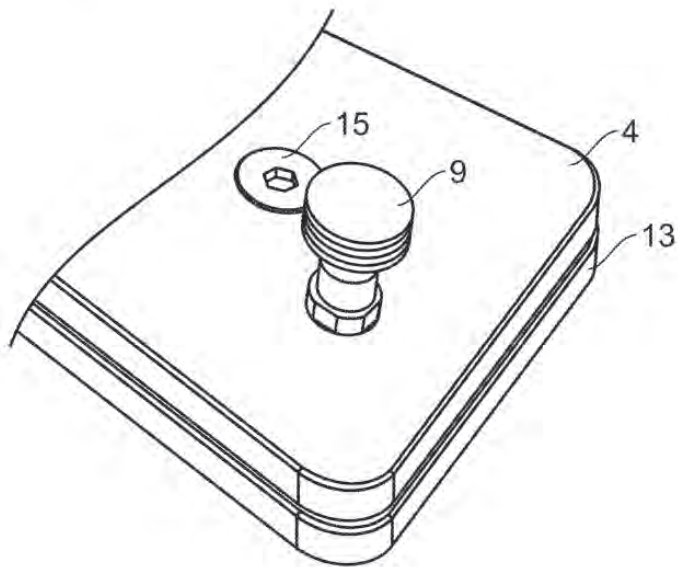


**FIG. 4**

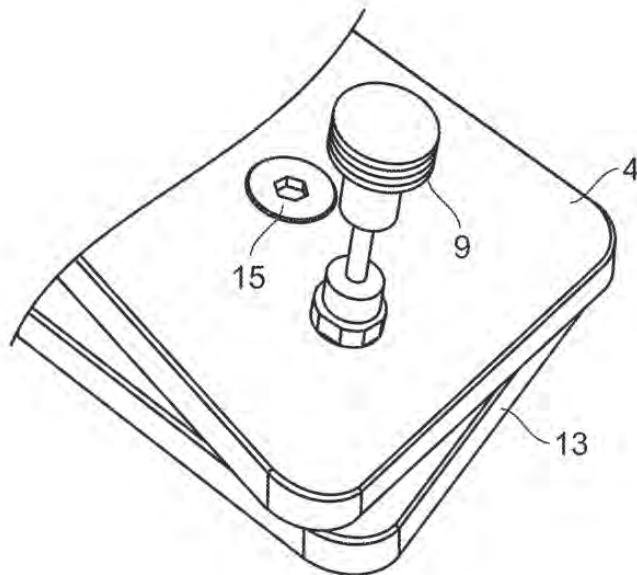


**FIG. 5**

EXHIBIT A

U.S. Patent

Mar. 25, 2025

Sheet 4 of 10

US 12,258,111 B1

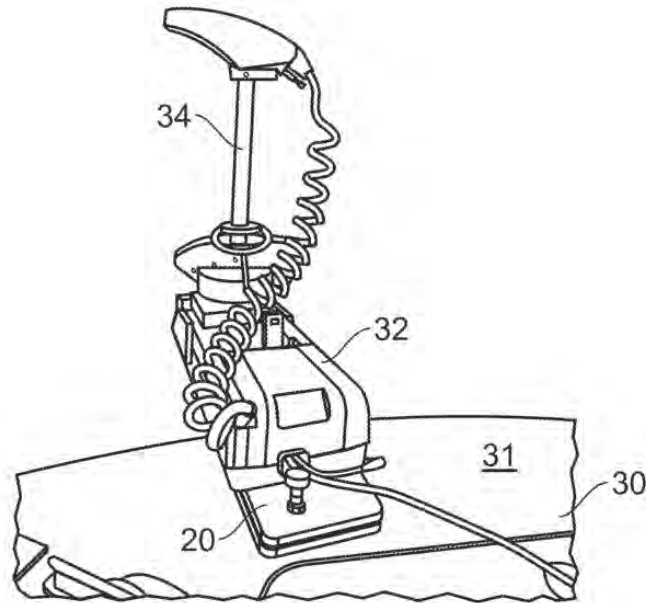


FIG. 6

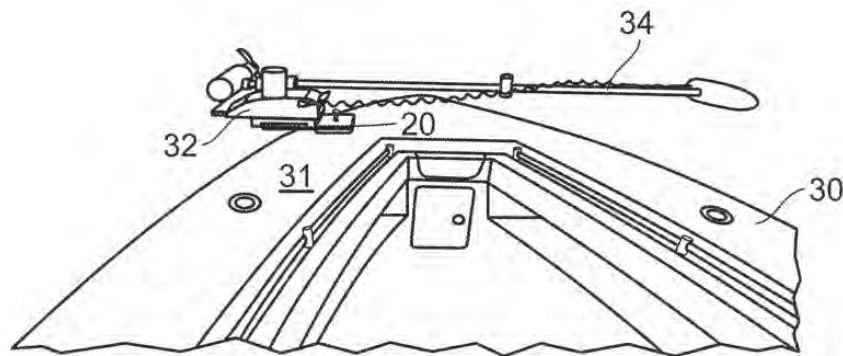


FIG. 7

EXHIBIT A

**U.S. Patent**

**Mar. 25, 2025**

**Sheet 5 of 10**

**US 12,258,111 B1**

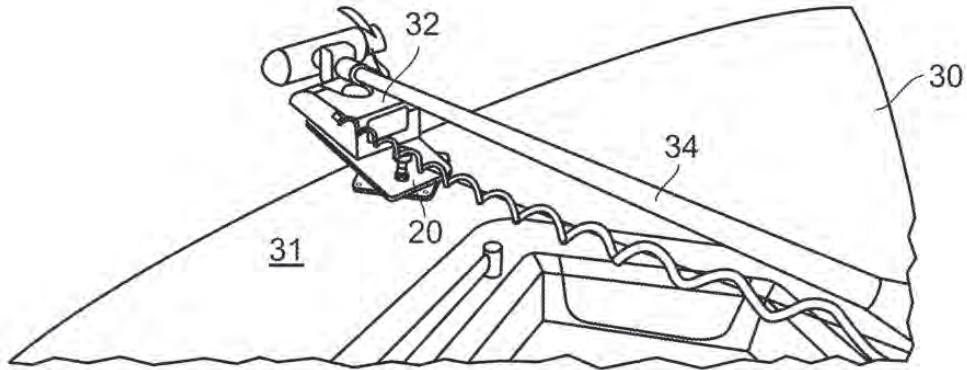


**FIG. 8**

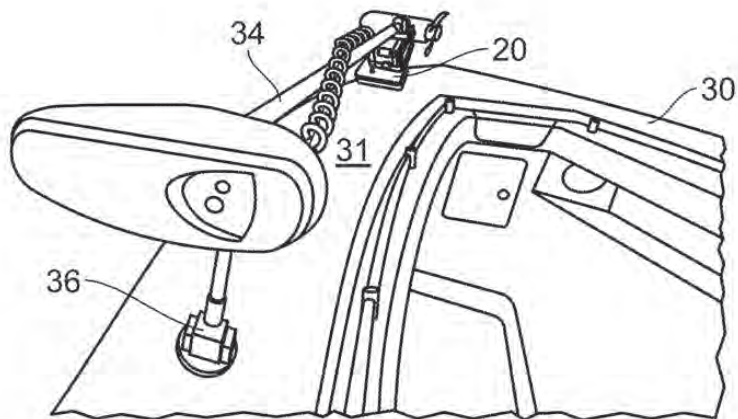


**FIG. 9**

EXHIBIT A

U.S. Patent

Mar. 25, 2025

Sheet 6 of 10

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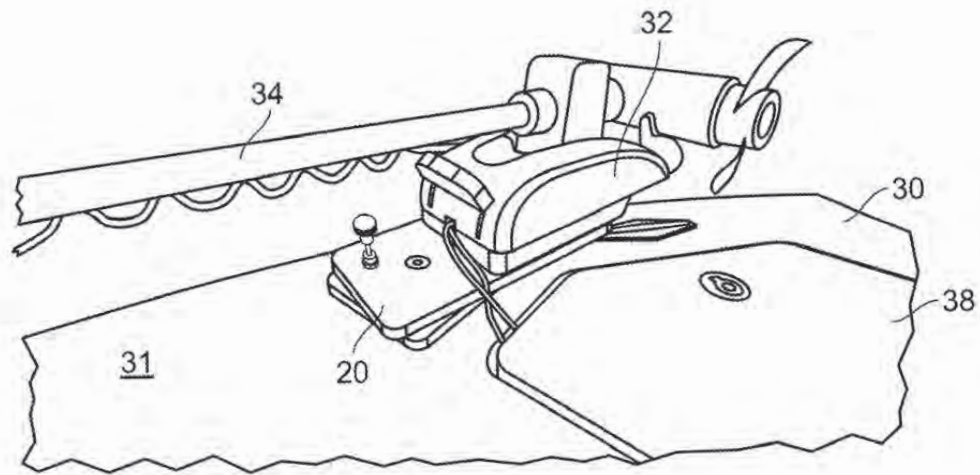


FIG. 10

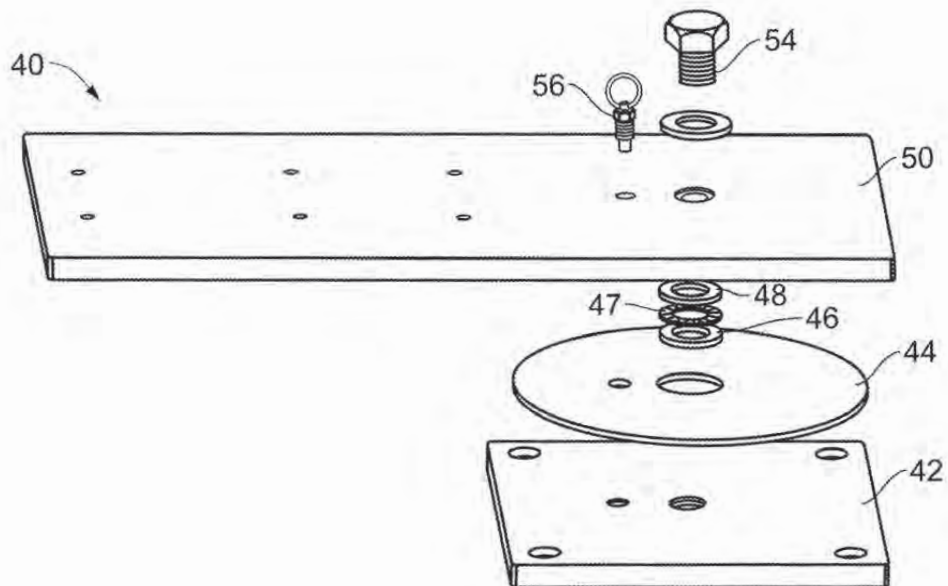


FIG. 11

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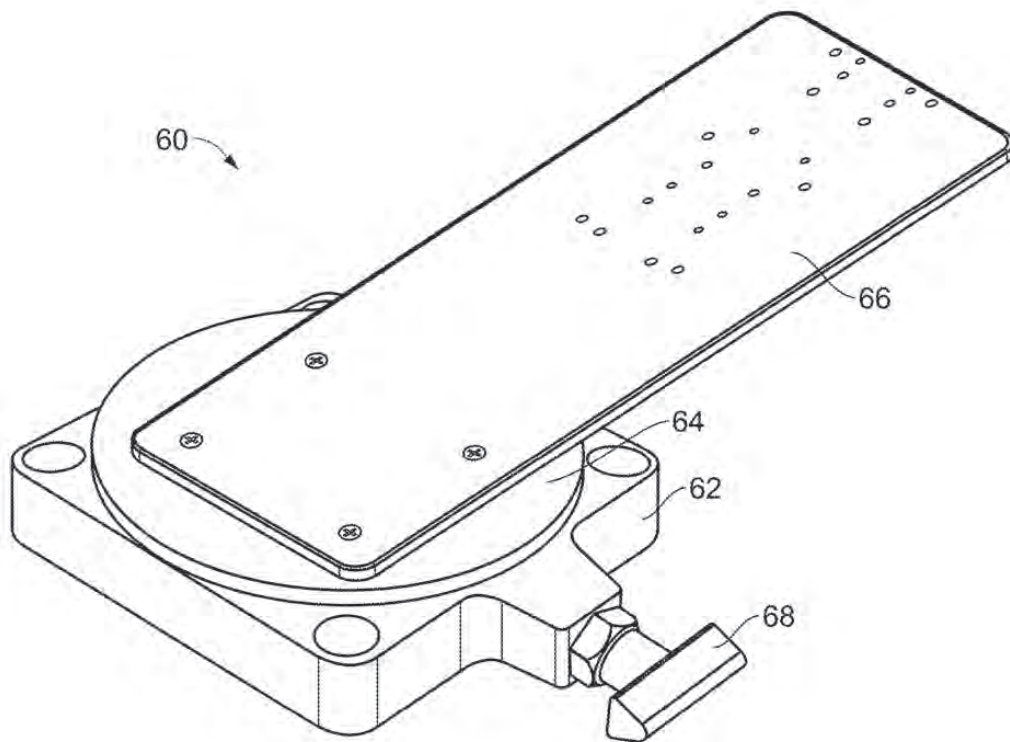


**FIG. 12**

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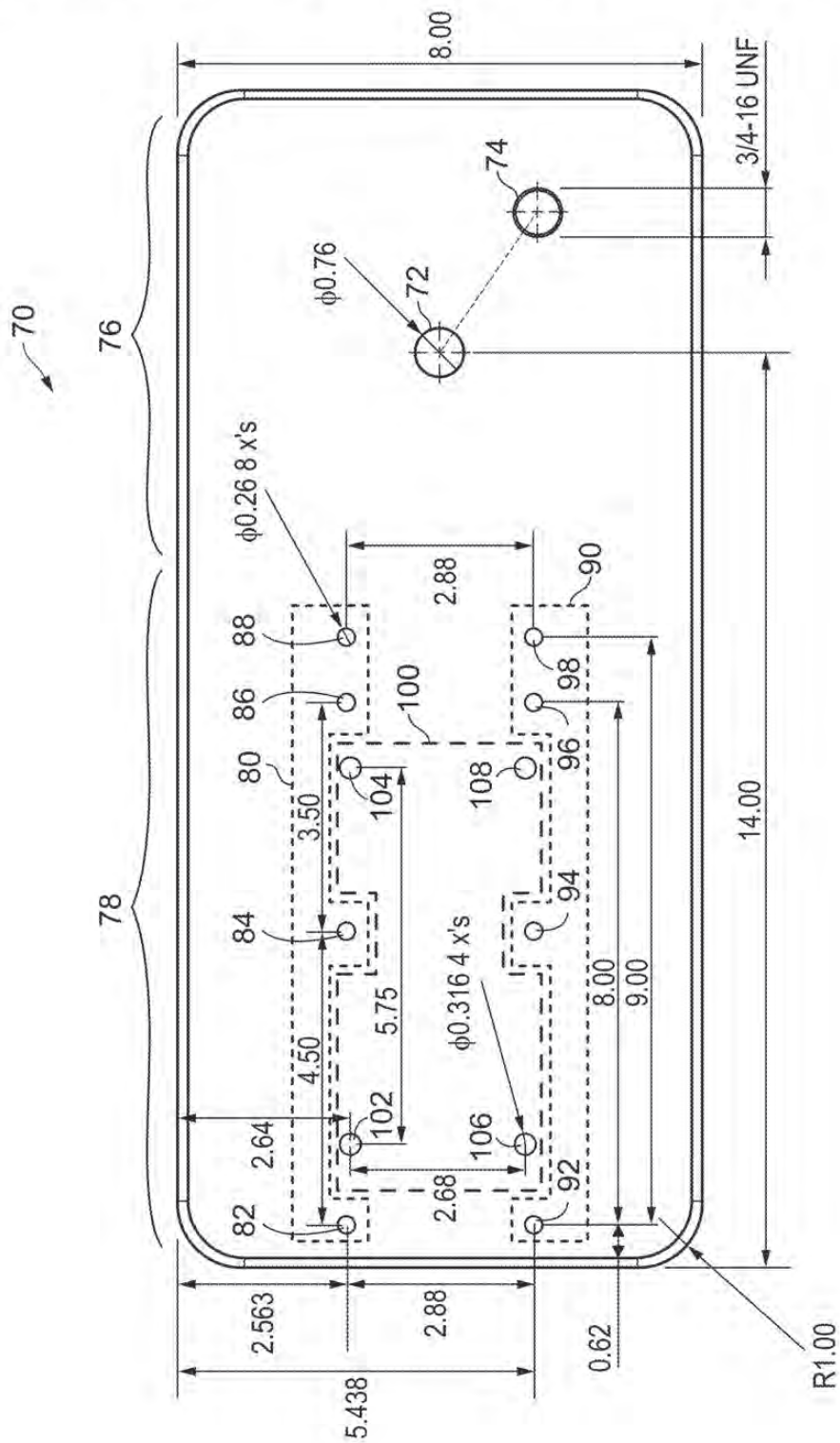


FIG. 13

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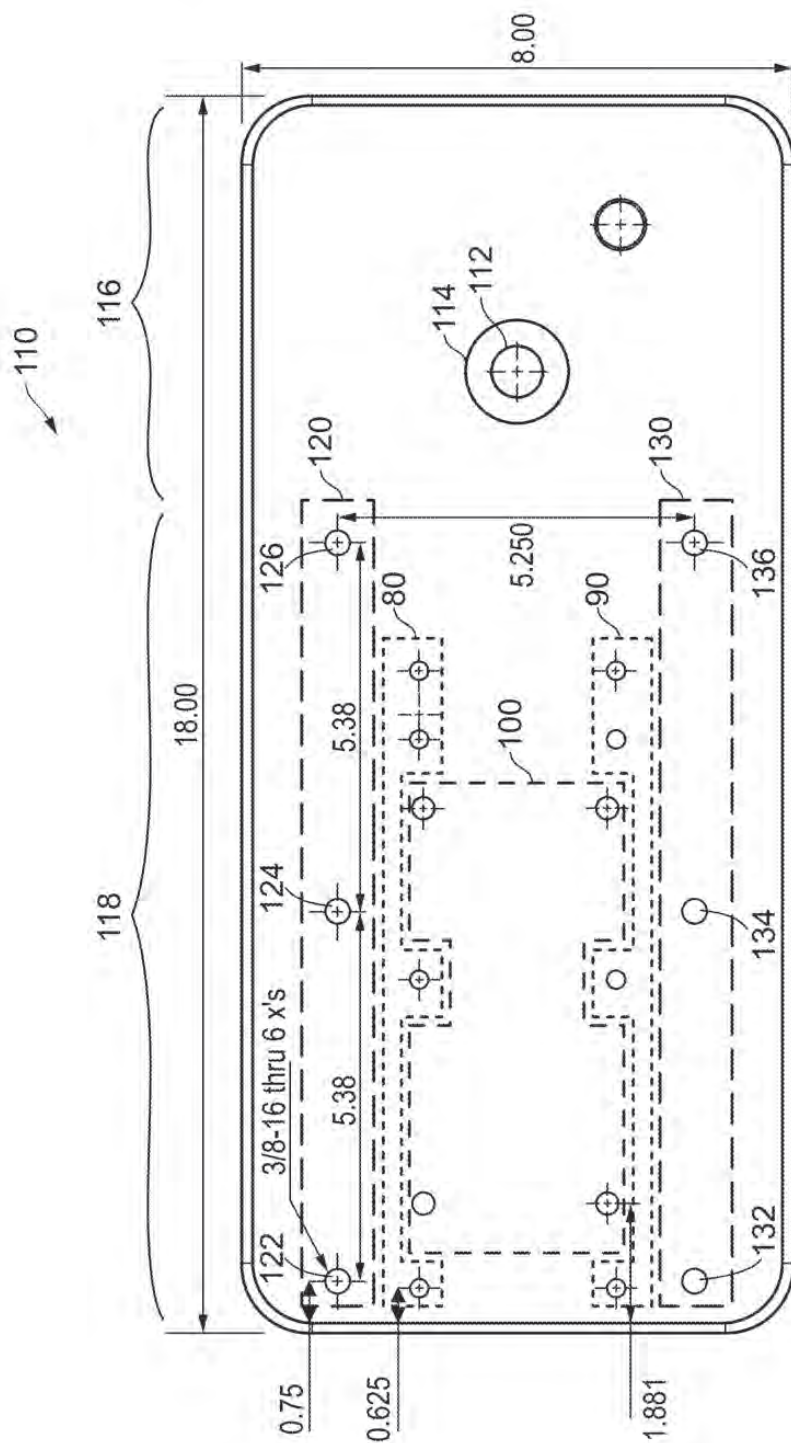


FIG. 14

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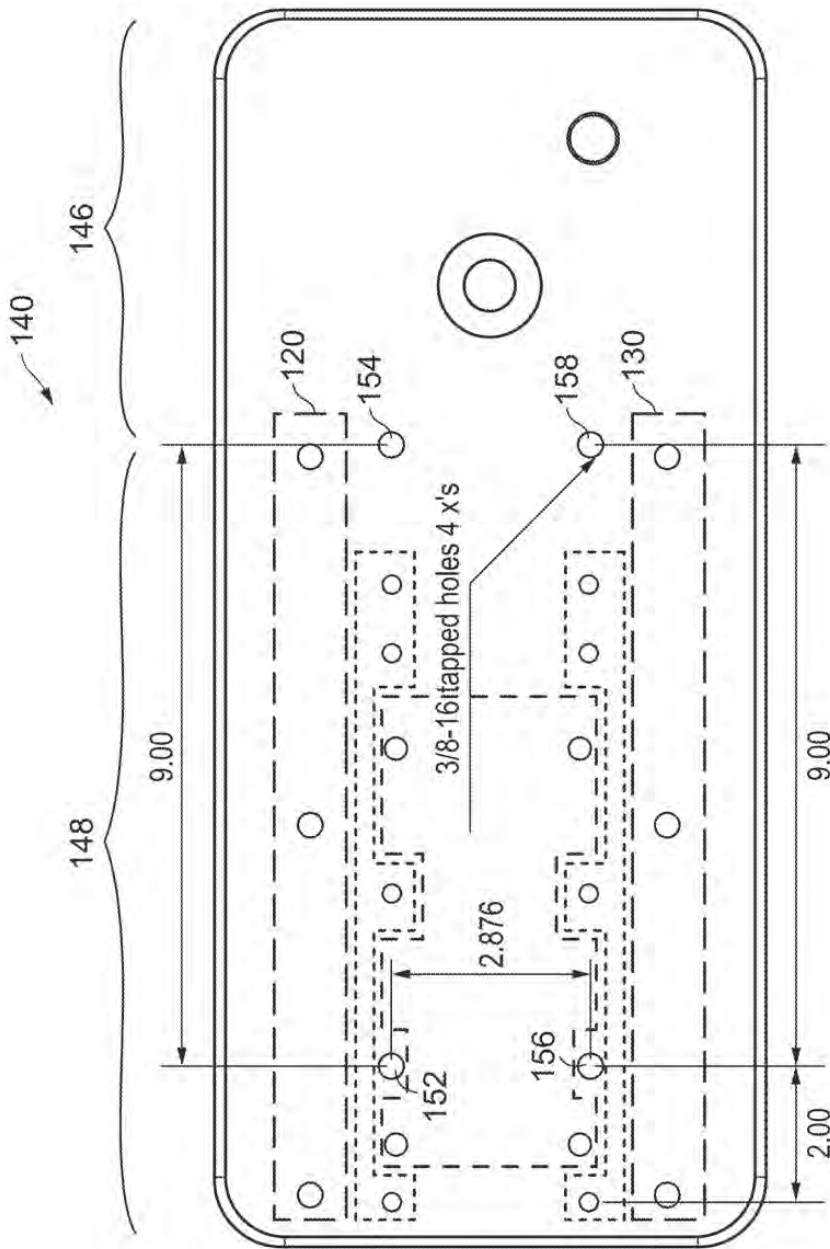


FIG. 15

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# SWIVEL MOUNTS FOR ATTACHING AND MANEUVERING ACCESSORIES OVER THE GUNNEL OF A BOAT OR ANY OTHER MOUNTING SURFACE

This application claims priority to U.S. Provisional Patent Application No. 63/540,483, filed Sep. 26, 2023.

## BACKGROUND OF THE INVENTION

### 1. Field of the Invention

This invention generally relates to swivel mounts and, more specifically, to swivel mounts for attaching and maneuvering accessories, such as but not limited to trolling motors, on and over the gunnel of a boat or any other mounting surfaces.

### 2. Description of the Related Art

The following descriptions and examples are not admitted to be prior art by virtue of their inclusion within this section.

Trolling motors are used to move a boat at a relatively low speed, offering a means to more easily maneuver a boat in a small area, keep the boat moving at a slow speed for troll fishing, or keep a boat from drifting from a desired location in cases in which the trolling motor includes a global positioning system. Despite their usefulness, the configuration of a boat to which a trolling motor is mounted as well as the size of the body of water in which a boat is used can present challenges regarding the manner to mount and store trolling motors in a boat. For instance, trolling motors are generally attached near the edge of the transom or bow of a boat and, in either case, as close to the centerline of the boat as possible. In some cases, the position at which a trolling motor is attached to the transom and/or bow of a boat may not be readily accessible from the deck of a boat. For instance, the transom and/or bow may have storage areas and/or may be designed with ledges which require a boater to climb up on to access a trolling motor. Such action may be precarious for some boaters, placing at them risk to fall either overboard or back into the deck.

Furthermore, propellers of trolling motors must be adequately submerged in the water when in use and, as such, the shaft lengths of trolling motors are generally proportional to the size of the boat with which it will be used and particularly to the freeboard height of the boat when the trolling motor is to be mounted near the bow of the boat. As a consequence, managing the placement of long trolling motors in large boats (i.e., particularly when the trolling motors are brought out of the water into the boats) can be a challenge. In some cases, the position at which a trolling motor is mounted near the bow is governed such that the shaft of the trolling motor may be aligned with and secured above the gunnel of the boat during storage, particularly so that the trolling motor does not obstruct space in the boat when it is stored. Such positioning, however, may be difficult to accomplish in some boat configurations. Moreover, boating on large bodies of water presents challenges to the use of trolling motors. In particular, the commotion caused by large waves can exert a significant amount of force (both laterally and vertically) against trolling motors suspended from a side of a boat (i.e., particularly if the waves are large enough to cause the propeller of the trolling motor to toggle from being in and out of the water). As a consequence, the manner in which the trolling motor is mounted to a boat needs to be sufficient to withstand such forces.

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Therefore, it would be advantageous to develop new mounts to secure trolling motors or other boating accessories to a surface on a boat, particularly to address one or more of the aforementioned challenges.

## SUMMARY OF THE INVENTION

The following description of various embodiments of mixtures and methods is not to be construed in any way as limiting the subject matter of the appended claims.

An embodiment of a swivel mount includes an elongated mounting plate and a support plate each having first and second opposing faces spaced apart by one or more peripheral sidewalls, but where the support plate has a length less than or equal to half a length of the elongated mounting plate. The swivel mount also includes a swivel element. The swivel mount is configured for the elongated mounting plate, the support plate, and swivel element to be coupled together such that the first faces of the support plate and the elongated mounting plate are parallel and the swivel element, the support plate, and the elongated mounting plate at least partially overlap each other. In addition, the arrangement of the swivel element in its coupling with the elongated mounting plate and the support plate is such that the elongated mounting plate is able to swivel 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.

An embodiment of a boat includes a gunnel and 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. The boat further includes a trolling motor mounting bracket coupled to an upward facing surface of the mounting member.

An embodiment of a mounting bracket includes a plate having first and second opposing faces spaced apart by one or more peripheral sidewalls and a plurality of through holes extending through the plate from the first opposing face to the second opposing face. The plurality of through holes include a first set of four holes of the same size in linear alignment with each other along a length of the plate and a second set of four holes of the same size as the first set of four holes and in linear alignment with each other along a length of the plate. Each of the second set of four holes is respectively in alignment with a different hole of the first set of four holes as taken along the width of the plate and each of the second set of four holes has a center point spaced 2.88 inches from a center point of its respective different hole of the first set of four holes. The first and second sets of four holes each include a first hole disposed closest to an end of the plate and a second hole having a center point disposed 4.5 inches from a center point of the first hole of its respective set of four holes in a direction away from the end of the plate. Moreover, the first and second sets of four holes each include a third hole having a center point disposed 3.5 inches from the center point of the second hole of its respective set of four holes in a direction away from the end of the plate and a fourth hole having a center point disposed 1.0 inch from the center point of the third hole of its respective set of four holes in a direction away from the end of the plate.

## BRIEF DESCRIPTION OF THE DRAWINGS

Other objects and advantages of the invention will become apparent upon reading the following detailed description and upon reference to the accompanying drawings in which:

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FIG. 1 illustrates a schematic view of an example of a swivel mount;

FIG. 2 illustrates an exploded view of the swivel mount depicted in FIG. 1;

FIG. 3 illustrates a side cross-sectional view of a boat having the swivel mount depicted in FIG. 1 coupled to the boat's gunnel;

FIG. 4 illustrates a perspective view of an end portion of the swivel mount depicted in FIG. 1;

FIG. 5 illustrates a perspective view of the end portion of the swivel mount depicted in FIG. 4 with the top plate of the swivel mount rotates relative to its middle plate;

FIG. 6 illustrates a trolling motor suspended exterior to a boat's hull via the swivel mount depicted in FIG. 1 mounted to the boat's gunnel;

FIG. 7 illustrates the trolling motor depicted in FIG. 6 pulled over the top deck of the boat;

FIG. 8 illustrates trolling motor depicted in FIG. 7 being moved away from the top deck of the boat across the deck of the boat;

FIG. 9 illustrates trolling motor depicted in FIG. 8 moved to be in alignment with the boat's gunnel;

FIG. 10 illustrates a closeup view of the propeller end of the trolling motor depicted in FIG. 9;

FIG. 11 illustrates an exploded view of another example of a swivel mount;

FIG. 12 illustrates a perspective view of yet another example of a swivel mount;

FIG. 13 illustrates a top view of an example mounting bracket for the swivel mounts disclosed herein;

FIG. 14 illustrates a top view of another example of a mounting bracket for the swivel mounts disclosed herein; and

FIG. 15 illustrates a top view of yet another example of a mounting bracket for the swivel mounts disclosed herein.

While the invention is susceptible to various modifications and alternative forms, specific embodiments thereof are shown by way of example in the drawings and will herein be described in detail. It should be understood, however, that the drawings and detailed description thereto are not intended to limit the invention to the particular form disclosed, but on the contrary, the intention is to cover all modifications, equivalents and alternatives falling within the spirit and scope of the present invention as defined by the appended claims.

#### DETAILED DESCRIPTION OF THE PREFERRED EMBODIMENTS

Swivel mounts for attaching and maneuvering accessories, such as but not limited to trolling motors, on to and over the gunnel of a boat or any other mounting surfaces are disclosed. With regard to the swivel mounts being used with trolling motors, the ability to swivel the trolling motor permits it to be stowed in various positions in a boat, preferably to align with the boat's gunnel. In addition, the ability to swivel a trolling motor further makes the orientation of the trolling motor mounting bracket on the gunnel less important since the trolling motor can be moved to align with the boat's gunnel. Although the description of the swivel mounts provided herein are emphasized for mounting and maneuvering trolling motors onto and over boat gunnels, the application of the swivel mounts is not necessarily so limited. In particular, the swivel mounts described herein may be used for mounting any boating accessory, such as but not limited to a rod holder or a downrigger, or any other object, such as but not limited to a personal electronic device

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or a marine global positioning system, to a boat gunnel or to any other surface of a boat. In addition, the swivel mounts described herein may be used for mounting objects in environments other than a boat. As set forth in more detail below, swivel mounts described herein may be pre-assembled or may be provided as an assembly kit with instructions on how to assemble the components of the mounts. As further set forth below, the swivel mounts may be included in assemblies having a mounted accessory. Moreover, boats having such swivel mounts and/or mounting assemblies are described.

In general, the swivel mounts disclosed herein include a support member, a mounting member, and a swivel coupling for enabling the mounting member to swivel relative to the support member, particularly about an axis which is perpendicular and passing through a face of the mounting member that is parallel with a receiving face of the support member and is offset from a center point of the mounting member. As set forth in detail below, the swivel coupling may, in some embodiments, include a bushing between the support member and the mounting member, a single bolt for holding the components together and a bearing providing rotation to the bolt and the mounting member. In other cases, the swivel coupling may include one or more annular bearings disposed within the member plate and/or between the support member and the mounting member providing swivel movement to the mounting member. In either case, the swivel mount may include a locking pin assembly for securing the mounting member in a set position relative to the support member. In some cases, a trolling motor mount bracket (such as but not limited to a quick-release trolling motor mounting puck and/or a trolling motor deploy/stow mechanism) may be coupled to the swivel mount. In addition or alternatively, a trolling motor may be coupled to the swivel mount. In yet further embodiments, the swivel mount (with or without the trolling motor mount and/or trolling motor) may be coupled to a mounting surface of a boat, such as but not limited to the gunnel of a boat. In any case, the aforementioned designs of the swivel mount have shown to withstand the high tension, stress, and forces incurred by waves during offshore boating.

As set forth in more detail below, the mounting member and support member may, in some embodiments, be plates each having flat opposing primary faces spaced apart by relatively short peripheral sidewalls. The flat opposing primary faces are surfaces used to couple the members to other objects as well as serve as an interface to which the mounting member swivels relative to the support member. The term "primary faces" as used herein refer to the surfaces of an object having the chief surface area. Although the mounting members and support members described herein are emphasized as plates, the members may have other structural configurations. For instance, a mounting member or a support member may include an additional section not having a flat slender configuration. In addition or alternatively, a mounting member or a support member may have a mounting face which is not flat and uniform, but rather has a contour configured to mate with a surface of a particular object to which it will be joined (such as being concave, convex, stepped, or grooved). As such, although the description of the swivel mounts provided herein emphasizes mounting on to flat surfaces and having a flat surface onto which an object may be mounted, the application of the swivel mounts is not necessarily so limited. Furthermore, regardless of the configuration of the mounting member and support member (i.e., whether they are plates or not), the

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contour of their areal periphery is not limited to being rectangular or square as depicted in the drawings provided herein.

In some cases, a mounting member of the swivel mounts described herein may be elongated, meaning that it has a longer length dimension than its width dimension. In some of such cases, the elongated member may have a first portion for receiving and/or aligning with one or more components of the swivel element and the support member of the swivel mount and a second portion extending from the first portion which is configured to receive and secure an object to the swivel mount. In this manner, an object mounted to the second portion of elongated mounting member may be laterally spaced a set distance from a pivot point of the swivel mount. A swivel mount having such an offset pivot point enables an object to be supported, and in some cases suspended, apart from the pivot point of the swivel mount. For instance, in cases in which a trolling motor mount bracket is coupled to such a swivel mount, the trolling motor mount bracket as a whole may be laterally spaced a set distance from a pivot point of the swivel mount. A trolling motor mount assembly having such an offset pivot point enables the trolling motor to be deployed over a gunnel and far enough away from the side of the boat. To enable such a configuration, the swivel mounts described herein are designed to have enough strength to counter the weight of an attached trolling motor as well as the forces it may incur in operation. In some cases, a support member of the swivel mounts described herein may have a length less than the mounting member of the swivel mount and, in some cases, a length less than or equal to half the length of the mounting member. As a result, the second portion of an elongated mounting member may be cantilevered from its first portion.

As set forth in more detail below, the swivel mounts disclosed herein may be used for mounting an object to a underlying surface, particularly having the support member of the swivel mount fastened onto a mounting surface and the mounting member arranged above and at least partially overlapping the support member such that an object may be secured to the mounting member at an elevation above the mounting surface to which the support member is fastened. Although the swivel mounts disclosed herein are emphasized for such a mounting configuration, it is noted that the swivel mounts may be alternatively used to mount objects to overlying surfaces or sidewall surfaces. In particular, the swivel mounts disclosed herein may in some cases be flipped (i.e., having the mounting member arranged below the support member) such that an object may be suspended at an elevation below a mounting surface to which the support member is fastened. In other cases, a support member of a swivel mount may be fastened onto a substantially upright mounting surface such that an object may be secured to the mounting member in a direction substantially sideways from the mounting surface to which the support member is fastened.

As noted above, the description of the swivel mounts provided herein are emphasized for mounting and maneuvering boating accessories onto and over boat gunnels. In particular, the swivel mounts described herein may be 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. In some cases, a swivel mount may include a top assembly coupled to an upward facing surface of a boat gunnel and a bottom assembly coupled to an underside surface of the gunnel. Although it is not necessarily so limited, such a mounting

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configuration may be particularly advantageous when the bottom assembly includes a bearing. In particular, having a bearing disposed along the underside of the gunnel may advantageously lessen its exposure to water splashing into the boat, in effect reducing its rate of corrosion and increasing its lifespan. Such an advantage may be even more beneficial for boats used in salt water. In any case, the swivel mounts disclosed herein may be particularly applicable for mounting to gunnels with an upward facing surface having a width greater than 4 inches, particularly to accommodate a swivel portion of the mount designed to have enough strength to counter the weight of an attached boating accessory as well as the forces exerted against the accessory during operation of the accessory or the boat. The term "gunnel" as used herein refers to an upper edge of a boat's hull and may be used interchangeably with the term "gunwale". The term is inclusive to the top deck portion at the bow of a boat.

In general, the swivel mounts disclosed herein may be applied to any type of boat, but may be particularly suitable for center console boats since they generally have a bow substantially higher than the deck of the boat and/or offshore boats since they are designed to maneuver in large bodies of water and, consequently, withstand large waves. The term "offshore boat" as used herein refers to a boat designed to withstand open water, particularly areas which are more than 30 meters deep. In some cases, the swivel mounts disclosed herein may be particularly suitable for saltwater boats since those type of boats are generally used on large bodies of water. The term "saltwater boat" as used herein refers to a boat having a closed cooling system for its motor and/or a mercathode system for its engine. In alternative cases, the swivel mounts described herein may be used in freshwater boats and/or inshore boats. In addition, the swivel mounts described herein may be used in relatively shallow boats, such as but not limited to flat skiffs and bay boats since those type of boats often have a large top deck.

In general, the swivel mounts disclosed herein may be used for mounting trolling motors of any size, which may be generally governed by the size and type of the boat it is to be mounted. As noted above, the swivel mounts disclosed herein may be particularly applicable for offshore boating and, thus, may be particularly suitable to mounting trolling motors having a shaft length greater than 60 inches and, in some cases, trolling motors having a shaft length greater than 100 inches. More specifically, the swivel mounts considered herein may be designed to withstand the high tension, stress, and forces exerted on trolling motors during offshore boating. In other cases, however, the swivel mounts considered herein need not be used in such rough environments and, thus, swivel mounts may be designed to be less robust in some cases. For example, the swivel element of a swivel mount may have a smaller bolt than as described for the embodiment disclosed in FIGS. 1 and 2 below and/or a swivel mount may not include a reinforcement member for placement on the underside of a boat gunnel. In addition or alternatively, the support member of a swivel mount may be smaller than described for the embodiment disclosed in FIGS. 1 and 2 below. Moreover, either or both of the support member and mounting member may be thinner or may be constructed of a less robust material than described for the embodiment disclosed in FIGS. 1 and 2 below.

Turning to the drawings, examples of swivel mounts and components thereof are depicted in FIGS. 1-5 and 11-15. In addition, FIGS. 6-10 illustrate examples of their use in mounting trolling motors to boats. The shape and relative size of the components of a swivel mount considered herein

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may vary depending on the design specifications of the swivel mount, the surface to which it will be mounted, and the size of the object which will be mounted to the swivel mount. Thus, the configurations of the swivel mounts considered herein are not necessarily restricted to the depictions in FIGS. 1-15.

FIGS. 1 and 2 respectively illustrate assembled and exploded views of swivel mount 20. As shown, swivel mount 20 includes bolt 15 as well as lower plate 6, bearing 7, middle plate 13, bushing 12, and top plate 4 each having a hole of substantially the same size for receiving bolt 15. In addition, swivel mount 20 includes nut 8 for securing bearing 7 to a bottom of lower plate 6 when bolt 15 is received through the holes of lower plate 6, bearing 7, middle plate 13, bushing 12, and top plate 4. When mounted to a gunnel of a boat, for example, middle plate 13 may be affixed to an upper surface of the gunnel and lower plate 6 may be affixed to an underside surface of the gunnel such as shown in the example configuration in FIG. 3. In particular, FIG. 3 illustrates a cross-sectional view of boat 30 taken along gunnel 31 either on the boat's starboard side or port side with a top assembly of middle plate 13, bushing 12 and top plate 4 coupled to an upward facing surface of the gunnel and a bottom assembly of lower plate 6, bearing 7 and nut 8 coupled to an underside surface of the gunnel. FIG. 3 also illustrates trolling motor deploy/stow bracket coupled to the upper surface of top plate 4 with attached trolling motor 34 suspended outside the boat's hull. In other embodiments, middle plate 13 and/or lower plate 6 may be omitted from swivel mount 20 and, thus, in some cases, bushing 12 may be placed on the upper surface of a gunnel of a boat and/or nut 8 may be used for securing bearing 7 against an underside surface of the gunnel.

Regardless of whether swivel mount 20 middle plate 13 and/or lower plate 6, swivel mount 20 may, in some cases, be arranged relatively close to the bow of a boat such as shown in FIG. 3. In other cases, however, swivel mount 20 may be displaced a few feet from the bow of the boat along its gunnel. Such a configuration may be particularly beneficial for boats in which it is difficult to access the bow of the boat from the deck. In particular, mounting a swivel mount farther from the bow of the boat may allow it to be accessed from the deck of the boat and, thus, may be less precarious for moving a trolling motor attached to the swivel mount in and out of the water. In such cases, in order for the boat to be maneuvered without preference to one side of the boat, a boat may have two trolling motors attached on each side of the boat (port and starboard sides).

In any case, middle plate 13 and lower plate 6 may, in some embodiments, be mounted to a surface, such as a gunnel of a boat, via bolts through corner holes 22 and 24, respectively, and in cases in which both plates are included in a swivel mount, a single bolt may be used for each corresponding pair of corner holes 22 and 24. It is noted that each of the corners of middle plate 13 and lower plate 6 respectively include holes 22 and 24, despite the holes in the one of the corners of each plate not being in view in FIG. 2. In addition or alternatively, middle plate 13 and/or lower plate 6 may be adhered to a surface and, thus, in some cases, middle plate 13 and/or lower plate 6 may not respectively include corner holes 22 and 24. In general, lower plate 6 and middle plate 13 may be advantageous for counteracting forces exerted on swivel mount 20 and any object mounted thereon. Thus, the inclusion of lower plate 6 and/or middle plate 13 in swivel mount 20 may aid in providing a more secure and robust mount for an object, particularly an object suspended from the mount, such as but not limited to a

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trolling motor over a gunnel of a boat. However, if the environment in which the swivel mount is to be used is not expected to induce strong lateral forces, lower plate 6 and/or middle plate 13 may be omitted. For instance, if the body of water in which a boat is to be used is not expected to have large waves and/or the shaft of a trolling motor attached to the swivel mount is relatively short, the forces exerted against the swivel mount and trolling motor may be minimal and, thus, a swivel mount not having lower plate 6 and/or middle plate 13 may be sufficient for use without concern of causing damage to the boat or the trolling motor. In light thereof, either or both of lower plate 6 and middle plate 13 may serve as a support member of the swivel mounts described herein.

The size and material of bolt 15 may further aid in counteracting forces exerted on swivel mount 20 and any object mounted thereon. For the development of the swivel mount disclosed herein, a  $\frac{3}{4}$  inch stainless steel bolt was shown to provide sufficient strength for supporting a trolling motor having a 108 inch shaft length in an offshore boating environment. However, smaller or larger bolts and/or bolts of different materials may be considered depending on the size of the trolling motor and the environment in which it is to be used. Another component of swivel mount 20 which may aid in counteracting forces exerted on swivel mount 20 and any object mounted thereon is the inclusion of locking pin assembly 9. In particular, locking pin assembly 9 is used to secure top plate 4 in a set position relative to middle plate 13 (or to a surface on which swivel mount 20 is mounted) and by doing so aids in counteracting forces exerted on swivel mount 20. The vertical orientation of the locking pin assembly may be particularly beneficial for counteracting forces exerted on swivel mount 20, but a horizontally oriented locking pin assembly such as shown in FIG. 12 may be suitable in some cases depending the size of the object to be suspended by swivel mount 20 and the environment in which it is to be used.

In any case, the locking pin assembly may have any type of configuration, including but not limited to including either a detent pin and/or a pull pin. In addition, the locking pin assembly may, in some cases, be a spring-loaded pin, a magnetic release pin, or an index plunger such that it automatically falls into its receiver when in the deployed position. In some cases, the locking pin assembly may be configured for manual actuation by a user, but in other embodiments it may be configured for automated movement. In latter of such cases, the automated movement of the locking pin assembly may, in some cases, be dependent on whether a trolling motor deploy/stow mechanism attached to the swivel mount was recently activated to bring a trolling motor out of the water and into a stowed position relative to the boat gunnel and/or whether the trolling motor deploy/stow mechanism has been recently activated to deploy a stowed trolling motor over the gunnel and into the water. To enable such dependency of movement, the swivel mount may, in some cases, include a switch for detecting activation of the trolling motor deploy/stow mechanism and subsequently activating the locking pin assembly. Alternatively, the swivel mount and the trolling motor deploy/stow mechanism may be configured for electrical communication with each other (i.e., either wired or wireless communication) to affect such dependency of movement. The latter embodiment may be particularly applicable but is not limited to embodiments in which the swivel mount is integrated into a trolling motor deploy/stow mechanism as described below.

As shown in FIG. 2, top plate 4, bushing 12, and middle plate 13 each include a second hole for receiving a shaft of

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locking pin assembly 9 (i.e., a hole second to the hole for receiving bolt 15). In some cases, middle plate 13 may include a retainer in its second hole for receiving the shaft of locking pin assembly 9, but in other embodiments the retainer may be omitted from middle plate 13. In any case, locking pin assembly 9 is configured such that a portion of it is affixed within the referenced second hole of top plate 6, but the shaft is vertically moveable through the affixed portion and, thus, is vertically moveable through the second holes of each of top plate 4, bushing 12, and middle plate 13. In particular, locking pin assembly 9 is configured to move the shaft upward to remove it from the respective holes of bushing 12 and middle plate 13, but keep a portion of the shaft within the respective hole of top plate 4. As a result, a portion of the shaft and the accompanying knob of locking pin assembly 9 is displaced upward when activated.

In some embodiments, bushing 12 and middle plate 13 may only include one hole for receiving the shaft of locking pin assembly 9 as shown in FIG. 2. In such cases, swivel mount 20 may be mounted on a surface in a specific orientation such that the shaft of locking pin assembly 9 secures middle plate 13 in a position that suspends an object mounted thereto in a particular location relative to the mounting surface of swivel mount 20. For instance, in embodiments in which a trolling motor is attached to swivel mount 20, swivel mount 20 may be mounted on a gunnel of a boat in a specific orientation such that the shaft of locking pin assembly 9 secures middle plate 13 in a position that suspends the trolling motor outside of the boat. An example orientation of swivel mount 20 arranged in such a manner is shown in FIG. 8 and is described in more detail below. In such cases, it may not be necessary for bushing 12 and middle plate 13 to have an additional hole to secure the trolling motor in a position over the gunnel surface (i.e., to secure top plate 4 in a different position relative to middle plate 13), particularly when the trolling motor is pulled out of the water and stored above the gunnel since the gunnel may include a trolling motor shaft clamp to secure the trolling motor in place.

FIGS. 4 and 5 depict the end portion of swivel mount 20 (referenced as first portion 26 in FIG. 1 and in more detail below) for embodiments in which bushing 12 and middle plate 13 only include one hole for receiving the shaft of locking pin assembly 9. More specifically, FIGS. 4 and 5 depict portion 26 of swivel mount 20 with locking pin assembly 9 in respectively different positions (i.e., recessed and retracted) based on the position of top plate 4 relative to middle plate 13. In particular, when top plate 4 and middle plate 13 are in alignment, the shaft of pull pin assembly 9 fits into the referenced second holes of top plate 4, bushing 12, and middle plate 13 and, thus, pull pin assembly 9 will be in a recessed position as shown in FIG. 4. In contrast, when the shaft of locking pin assembly 9 is shifted upward to swivel top plate 4 relative to middle plate 13, the shaft will be withdrawn from the referenced second holes of bushing 12 and middle plate 13 and will remain in a retracted position as shown in FIG. 5 since bushing 12 and middle plate 13 do not have additional holes to accommodate the shaft of locking pin assembly 9.

It is noted that the positions of the referenced second holes of bushing 12 and middle plate 13 do not necessarily need to align with the referenced second hole of top plate 4 when top plate 4 is aligned with middle plate 13. In particular, swivel mount 20 may be alternatively configured to secure the shaft of locking pin assembly 9 into the referenced second holes of bushing 12 and middle plate 13 when top plate 4 is not aligned with middle plate 13. As such, the

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different positions of locking pin assembly 9 depicted in FIGS. 4 and 5 (i.e., recessed and retracted) may, in some cases, may be reversed. In particular, when top plate 4 and middle plate 13 are in alignment, pull pin assembly 9 may be in a retracted position and when top plate 4 and middle plate 13 are not in alignment, pull pin assembly 9 may be in a seated position (i.e., if the top plate is positioned such that all three of the referenced second holes are in alignment).

In other embodiments, bushing 12 and, in some cases, middle plate 13 may include multiple holes in proximity to their perimeters for securing the shaft of locking pin assembly 9, enabling top plate 4 to be secured at different positions relative to middle plate 13. It is noted that although middle plate 13 may include multiple holes for securing the shaft of locking pin assembly 9, additional holes may weaken the integrity of middle plate 13 affecting the strength of swivel mount 20 to counteract applied forces against it. Bushing 12 includes a material that permits the rotational movement of top plate 4 relative to middle plate 13, such as but not limited to polytetrafluoroethylene (PTFE), but does not substantially counteract forces applied against swivel mount 20. Consequently, the inclusion of additional holes in bushing 12 will not affect the strength of swivel mount 20. As such, in some cases, bushing 12 may include multiple holes in proximity to its perimeter for securing the shaft of locking pin assembly 9 while middle plate 13 may only include a single hole for securing the shaft of locking pin assembly 9.

In general, bearing 7 of swivel mount 20 allows the entirety of bolt 15 to swivel with top plate 4. Bearing 7 may be any type of bearing to allow such movement, such as but not limited to a thrust ball bearing. A benefit of the design of swivel mount 20 is that bolt 15 may be the only bolt in the swivel element of the mount. In particular, the use of a single bolt limits the number of holes to be made in the surface to which swivel mount 20 is to be attached, such as to the gunnel of a boat, reducing the amount of alteration and potential damage to the mounting surface. In general, the combination of bolt 15, bearing 7 and nut 8 serves as a swivel element of the swivel mount. More specifically, the combination of bolt 15, bearing 7 and nut 8 serves to provide swivel (i.e. rotational) movement of top plate 4 about the shaft of bolt 15. Given the orientation of bolt 15 relative to top plate 4, the combination of bolt 15, bearing 7 and nut 8 serves to also provide swivel (i.e. rotational) movement of top plate 4 about an axis perpendicular to and passing through primary faces of top plate 4. Furthermore, the combination of bolt 15 and nut 8 serves to couple top plate 4, middle plate 13, and lower plate 6 together such that their primary faces are parallel, and they at least partially overlap. With such a configuration, swivel mount 20 is configured to provide swivel movement of top plate 4 in a plane parallel with the primary faces of middle plate 13 and further the surface to which it is mounted, such as a gunnel of a boat.

As shown in FIGS. 1 and 2, top plate 4 includes first portion 26 (illustrated as the right-hand portion in the figures) in which bolt 15 and pull pin assembly 9 is mounted and to which bushing 12, middle plate 13, bottom plate 13, bushing 7 and nut 8 are aligned. In addition, top plate 4 includes second portion 28 (illustrated as the left-hand portion in the figures) extending from first portion 26. In general, second portion 28 of top plate 4 is configured to receive and secure an object to swivel mount 20 and, thus, top plate 4 may serve as a mounting member of swivel mount 20. In some cases, as shown in FIGS. 1 and 2, second portion 28 of top plate 4 may include a plurality of through holes 29 for receiving a plurality of bolts or screws to secure an object to top plate 4. As set forth in detail below, an object

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may be attached to a topside surface of top plate 4 (i.e., the surface of top plate 4 from which locking pin 9 extends) via plurality of through hole 29. Although it may not be conducive for an application of mounting a trolling motor over a boat gunnel, it is possible in other applications for an object to be mounted to the underside surface of top plate 4 (i.e., the surface of top plate 4 cantilevered and adjacent to bushing 12 and middle plate 13) via plurality of through holes 29 if the object does not interfere with the mounting surface to which swivel mount 20 is affixed when it is swiveled.

As further described below in reference to FIGS. 13-15, the number and arrangement of through holes 29 in top plate 4 may vary depending on the object which will be mounted to the swivel mount and, in some cases, may be configured to accommodate a plurality of different types of objects or different models of the same type of object. For example, the number and arrangement of through holes 29 may be configured to accommodate different models of trolling motors or different models of trolling motor mount brackets. FIGS. 1 and 2 illustrate an example layout of through holes 29 which may serve such a purpose, but other arrangements may be considered to achieve such an objective as described in reference to FIGS. 14 and 15. In other embodiments, second portion 28 of top plate 4 may include an arrangement of through holes which are specific to mounting a particular make and model of a trolling motor or a particular make and model of a trolling motor mounting bracket. In yet other cases, through holes 22 may be omitted from top plate 4 and, instead, second portion 28 of top plate 4 may include a sliding track for slidably receiving an object on top plate 4, such as a sliding track for receiving a trolling motor or a trolling motor mount bracket to the swivel mount. In some cases, the sliding track may be configured to secure an object thereto, such as via a locking latch for example. In other cases, swivel mount 20 may include a separate component for securing an object on to the sliding track. In any case, the configuration of top plate 4 to have the aforementioned distinct first and second portions enables an object as a whole to be laterally arranged a set distance from a pivot point of swivel mount 20 and, thus, swivel mount 20 has an offset pivot point.

In general, the size of top plate 4, middle plate 13 and lower plate 6 may vary depending on the application in which swivel mount is to be used. For example, for applications of securing a boating accessory above a gunnel, lower plate 6 may be sized to fit to an underside surface of the gunnel. Although middle plate 13 may not be restricted to the size of an upper surface of a gunnel, it is generally not favorable to have any item, much less a mounting plate jutting out into a deck area of a boat. Furthermore, it is generally not appealing to have an item, much less a mounting plate jutting out from the exterior of a boat. As such, for such reasons, it may be advantageous to limit the size, particularly the width, of middle plate 13 to fit on an upper surface of a gunnel without extending past its edges. An exemplary width range for middle plate 13 may be between approximately 4 inches and approximately 12 inches and, more specifically, between approximately 6 inches and approximately 10 inches, but larger and smaller widths may be considered depending on the size of the gunnel to which swivel mount may be affixed. Although a greater range of lengths that may be considered for middle plate 13, it is generally advantageous to limit the number of holes drilled into a surface of a boat, including its gunnel. As such, it may be advantageous to limit the length of middle plate 13 to be 75% to 125% the width of the plate. As shown

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in FIGS. 1 and 2, middle plate 13 and lower plate 6 may, in some embodiments, be square, but other shapes may be considered, such as but not limited to being circular, rectangular, or elliptical.

In contrast to middle plate 13 and lower plate 6, top plate 4 is sized to jut out from the surface to which swivel mount 20 is affixed. As such, at least the length of top plate 4 is not restricted to the surface area to which swivel mount is affixed. However, for an application in which swivel mount 20 is used to maneuver a trolling mount assembly over a boat's gunnel to the exterior of the boat's hull, it may be favorable to limit the width of top plate 4 to fit on the upper surface of the gunnel without extending past its edges. As a result, in some cases, top plate 4 may be elongated (meaning it has a longer length dimension than a width dimension). Furthermore, in light of the noted size restrictions of middle plate 13, particularly for applications in which swivel mount 20 is to be affixed to a boat gunnel, top plate 4 may have a longer length than middle plate 13 and, in some cases, may be twice as long or more. Alternatively stated, in some cases, middle plate 13 may have a length less than or equal to half the length of top plate 4 as is depicted in FIGS. 1 and 2. As a result, portion 28 of top plate 4 may be cantilevered from the coupling of portion 26.

In general, the length of top plate 4 may vary depending on the distance or area to which an object mounted thereon is to be moved via swivel mount 20. In general, it is advisable to extend a trolling mount assembly at least 14 inches past a boat's gunnel in order to make sure the trolling motor does not come into contact with the exterior of the boat's hull. Given that trolling motor brackets are generally designed to suspend trolling motors from its end by a couple of inches, it would be advantageous for portion 28 of top plate 4 to be greater than 10 inches and, preferably 12 inches or more. It is also advisable to limit the distance a trolling motor is extended past a boat's gunnel since the farther a trolling motor is extended from a boat the more susceptible it will be to damage caused by forces incurred during boating, particularly in an offshore environment. For instance, it may be advantageous for the length of portion 28 of top plate 4 to be less than 20 inches and, preferably less than 18 inches. Coupling such length ranges with the size range noted for middle plate 13 (which may or may not be the same size as portion 26 of top plate 4), an exemplary length range for top plate 4 may be between approximately 12 inches and approximately 30 inches, and more specifically, between approximately 14 inches and approximately 20 inches.

The thickness of top plate 4, middle plate 13, and lower plate 6 may vary depending on the application in which swivel mount is to be used and, in regard to top plate 4 and middle plate 13, may depend on the height to mount an object above a mounting surface to which middle plate 13 is affixed. In addition, the thickness of top plate 4, middle plate 13, and lower plate 6 may depend on the material used for the plates. An example thickness range for top plate 4, middle plate 13, and lower plate 6 may be between approximately 0.15 inches and approximately 1.0 inch, but larger and smaller thicknesses may be considered. The material used for top plate 4, middle plate 13, and lower plate 6 may be the same or may be different, but in either case the material used for top plate 4, middle plate 13, and lower plate 6 may generally depend on the application in which swivel mount is to be used. For example, for applications of mounting accessories to a boat, top plate 4, middle plate 13, and lower plate 6 may include a material that is resistant to marine corrosion. Furthermore, for applications in which a

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trolling motor is mounted over a gunnel a boat, top plate 4, middle plate 13, and lower plate 6 may include a material strong and thick enough to tolerate the forces exerted against the accessory during operation of the accessory or the boat, particularly for applications of offshore boating. Example materials for such applications include but are not limited to 7075-T6 precipitation-hardened aluminum alloy due to its high strength to weight ratio.

An example of using swivel mount 20 to support and maneuver a trolling motor over a boat gunnel is shown in FIGS. 6-10. In particular, FIG. 6 illustrates trolling motor 34 suspended outside of boat 30 by trolling motor deploy/stow bracket 32, which is coupled to the upper surface of swivel mount 20 on an upward facing surface of gunnel 31 near the bow of the boat. FIG. 7 illustrates trolling motor 34 in a position across the top deck portion of boat 30 after being pulled from its position over gunnel 31. FIG. 8 illustrates trolling motor 34 in a position across the deck of boat 30 after locking pin assembly 9 of swivel mount 20 has been activated and while the trolling motor 34 is being moved via the swivel movement of top plate 4 of swivel mount 20. FIG. 9 illustrates trolling motor 34 in alignment with gunnel 31 in a direction extended from the bow of the boat after its movement to such a stowed position via the swivel movement of top plate 4 of swivel mount 20. In such an embodiment, trolling motor 34 is secured in such the stowed position by trolling motor shaft clamp 36 coupled to gunnel 31. It is noted that such a stowed position is advantageous in that trolling motor 34 does obstruct areas of the boat deck nor does it obstruct access anchor locker 38 as shown in FIG. 10. In particular, FIG. 10 is a close-up view of trolling motor 34 in its stowed position of FIG. 9, particularly showing mount 20, trolling motor deploy/stow bracket 32 as well as the shaft and propeller end of trolling motor 34 displaced from access anchor locker 38. Moreover, FIG. 10 illustrates top plate 4 of swivel mount 20 out of alignment with middle plate 13 and with locking pin assembly 9 in a retracted position such as described in reference to FIG. 5.

FIGS. 11 and 12 illustrate other examples of swivel mounts which may be used to mount accessories, such as but not limited to trolling motors, on to and over a gunnel of a boat or any other mounting surfaces. The swivel mount 40 depicted in FIG. 11 differs from swivel mount 20 depicted in FIGS. 1-10 in that it does not include a middle plate and the locking pin assembly 56 is in a different position relative to bolt 54. In addition, swivel mount 40 includes bearing 47 disposed between washers 46 and 48 and more generally between top plate 50 and bushing 44. Although not shown, swivel mount 40 includes a nut for securing base plate 42 against a mounting surface with top plate 50, bearing 47 and bushing 44 compiled above it. Similar to middle plate 13 of swivel mount 20 discussed in reference to FIGS. 1-10, base plate 42 may include corner holes for further affixing it to a mounting surface. In addition to what is shown, swivel mount 40 may, in some embodiments, include a reinforcement plate for coupling to base plate 42 along an underside of a mounting surface, such as a gunnel of a boat. In any case, bolt 54 and bearing 47 serve as a swivel element for swivel mount 40, particularly providing swivel (i.e. rotational) movement of top plate 50 about the shaft of bolt 54. With such a configuration, swivel mount 40 is configured to provide swivel movement of top plate 50 in a plane parallel with the primary faces of base plate 42 and further the surface to which it is mounted, such as a gunnel of a boat.

As shown in FIG. 11, top plate 50 may include a plurality of through holes in its cantilevered portion for mounting an object. Similar to top plate 4 of swivel mount 20 described

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in reference to FIGS. 1 and 2, the number and arrangement of through holes in top plate 50 may vary depending on the object which will be mounted to the swivel mount and, in some cases, may be configured to accommodate a plurality of different types of objects or different models of the same type of object. Top plate 50 may include the same number and arrangement of through holes as top plate 4 of swivel mount 20 or may be different as shown in FIG. 11. Plates having other quantities and arrangement of through holes that may be considered for top plate 50 are shown and described in reference to FIGS. 13-15.

The swivel mount 60 depicted in FIG. 12 differs from swivel mounts depicted in FIGS. 1-11 in that it does not include a central bolt for its swivel element. Rather, swivel mount 60 includes swivel element 64 disposed on or within base plate 62. In general, swivel element 64 includes an annular bearing to provide swivel (rotational) movement of swivel element 64 relative to base plate 62. Via its coupling to top plate 66 (such as via the four screws shown in FIG. 12), swivel element 64 provides swivel (rotational) movement of top plate 66 relative to base plate 62 and, in particular about an axis that is perpendicular and passing through the primary faces of top plate 50 at a point spaced from a widthwise center lines of the plate. In other words, swivel element 64 provides swivel (rotational) movement of top plate 66 in a plane parallel to the upper surface of base plate 62. As shown in FIG. 12, top plate 66 is elongated, offering an extended platform on which to secure an object, such as but not limited to a trolling motor mounting bracket. Another difference of swivel mount 60 from swivel mounts 20 and 40 is that swivel mount 60 includes a horizontal locking pin assembly. In other embodiments, however, swivel mount 60 may be modified to include a vertical pull pin assembly such as described in reference to FIGS. 1-11. Similar to middle plate 13 of swivel mount 20 discussed in reference to FIGS. 1-10, base plate 62 may include corner holes for further affixing it to a mounting surface, such as but not limited to a boat gunnel. In addition to what is shown, swivel mount 60 may, in some embodiments, include a reinforcement plate for coupling to base plate 62 along an underside of a mounting surface, such as a boat gunnel.

Similar to top plate 4 of swivel mount 20 and top plate 50 of swivel 40, top plate 66 of swivel mount 60 may include a plurality of through holes in its cantilevered portion for mounting an object. In general, the number and arrangement of through holes in top plate 66 may vary depending on the object which will be mounted to the swivel mount and, in some cases, may be configured to accommodate a plurality of different types of objects or different models of the same type of object. In some cases, top plate 66 may include the same number and arrangement of through holes as top plate 4 of swivel mount 20 or top plate 50 of swivel mount 40. Alternatively, top plate 66 may be different number and arrangement of through holes as shown in FIG. 12. Plates having other quantities and arrangement of through holes that may be considered for top plate 66 are shown and described in reference to FIGS. 13 and 14.

As noted above in reference to swivel mount 20 described in reference to FIGS. 1 and 2, the number and arrangement of through holes 29 in top plate 4 may be configured to accommodate different models of trolling motor mount brackets. Top plate 4 of swivel mount 20 and top plate 50 of swivel mount 40 illustrate examples of through-hole arrangements which may be used for such a purpose. FIGS. 13-15 illustrate mounting brackets having other through-hole arrangements which may be considered as well for the mount members of the swivel mounts disclosed herein.

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Turning to FIG. 13, a top view of plate 70 is shown having one its primary faces facing upward and having a plurality of through holes extending through to the plates opposing primary face. The length of the plate is 18 inches and the width of plate 70 is 8 inches, but larger or smaller outer peripheral dimensions may be considered as they do not generally affect the mounting of a trolling motor mounting bracket. Plate 70 is configured to be a top plate for a swivel mount comprising a bolt, bushing, and bearing as its swivel element, such as discussed for swivel mounts 20 and 40 in reference to FIGS. 1 and 11, respectively. As such, plate 70 includes through hole 72 for accommodating a bolt of a swivel element. In addition, plate is configured to have a vertical locking pin assembly, such as discussed for swivel mounts 20 and 40 in reference to FIGS. 1 and 11, respectively. As such, plate 70 includes through hole 74 for accommodating a locking pin assembly. It is noted, however, that plate 70 may alternatively include a horizontal locking pin assembly extending from a sidewall of plate 70 and/or plate 70 may be configured for mounting to a swivel disc such as swivel element 64 shown and described in reference to FIG. 12. As such, either or both of through holes 72 and 74 may be omitted from plate 70. In some cases, plate 70 may include other through holes for coupling the right hand side of plate 70 to a swivel disc.

Regardless of the number and arrangement of through holes in portion 76 of plate 70, portion 78 may include the specific number and arrangement of through holes shown in FIG. 13 to accommodate different models and manufacturers of trolling motor mount brackets. In particular, the specific number and arrangement of through holes in portion 78 of plate 70 are configured to accommodate quick release pucks or inner plates for the Force® Kracken trolling motor available from Garmin®, the 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. The benefit of being able to accommodate so many different models and manufacturers of trolling motor mount brackets is that the swivel mount to which plate 70 may be universally used and, in turn, the complexity of matching a swivel mount for a particular trolling motor may be minimized. In addition, the variation of a product line of swivel mounts may be minimized, allowing production costs to be lower and processing orders to be simpler. The through holes in portion 78 of plate 70 are described below with respective to different sets of holes and the spacing of the holes in each set as well as the placement of one set relative to another. The different sets of holes are outlined by dotted lines in FIG. 13, but the dotted lines are not part of plate 70. Rather, the dotted lines are merely used to describe the arrangement of through holes in portion 78 of plate 70.

As shown in FIG. 13, the through holes in portion 78 of plate 70 include a first set of four holes 80 of the same size in linear alignment with each other along a length of the plate. In particular, first set of four holes 80 includes through holes 82, 84, 86 and 88 each having a diameter of 0.26 inches and each having a center point spaced from the same peripheral edge of plate 70 by 2.564 inches. Further to such holes, portion 78 of plate 70 include a second set of four holes 90 of the same size as holes 82, 84, 86 and 88 and in linear alignment with each other along a length of the plate. In particular, second set of four holes 90 includes through holes 92, 94, 96 and 98 each having a diameter of 0.26 inches and each having a center point spaced from the same peripheral edge of plate 70 by 5.438 inches. The arrangement of the individual holes of the first and second sets of

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four holes 80 and 90 along the length of plate 70 is such that the each of the second set of four holes 90 is in respective alignment with a different hole of the first set of four holes 80 as taken along the width of the plate. In particular, holes 92, 94, 96 and 98 are in respective alignment with each of holes 82, 84, 86 and 88 as taken along the width of plate 70. Since both first and second sets of holes 80 and 90 are in linear alignment with each other along the length of plate 70, holes 92, 94, 96 and 98 are respectively spaced from holes 82, 84, 86 and 88 by the same distance, namely having 2.88 inches between the center points of the each of the corresponding holes of the two sets as shown in FIG. 13.

As further shown in FIG. 13, holes 82 and 92 are disposed closest to an end of plate 70 among the holes of their respective sets, particularly each having their center points 0.62 inches from the edge of the plate. Furthermore, each of holes 84 and 94 are shown having a center point respectively disposed 4.5 inches from a center point of holes 82 and 92 in a direction away from the noted end of the plate. Moreover, each of holes 86 and 96 have a center point respectively disposed 3.5 inches from the center point of holes 84 and 94 in a direction away from the noted end of the plate. Lastly, each of holes 88 and 98 have a center point respectively disposed 1.0 inch from the center point of holes 86 and 96 in a direction away from the end of the plate. The specific arrangement and size of the first and second holes accommodate the quick release pucks or inner plates of the 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. More specifically, holes 82, 88, 92 and 98 accommodate the quick release pucks or inner plates of Move PV trolling motor available from Power Pole and the RTA quick release inner plates available from Minn Kota®, while holes 82, 84, 86, 92, 94 and 96 accommodate 4 bolt pucks and 6 bolt pucks available from Rhodan.

To accommodate inner plates for the Force® Kracken trolling motor available from Garmin®, plate 70 includes a third set of four holes 100 of the same size as each other but larger size than the first and second sets of four holes 80 and 90. In particular, plate 70 includes holes 102, 104, 106 and 108 each having a diameter of 0.316 inches. Moreover, holes 102, 104, 106 and 108 are disposed within an area of plate 70 bounded by the first and second sets of four holes 80 and 90. In particular, set of four holes 100 is arranged between set of four holes 80 and set of four holes 90. As shown in FIG. 13, holes 102 and 104 have their center points 5.75 inches apart and linearly aligned parallel with the first set of four holes 80. In addition, holes 106 and 108 are arranged in respective alignment with holes 102 and 104 as taken along the width of plate 70, wherein each of the second set of two holes has a center point spaced 2.68 inches from a center point of its respective different hole of the first set of two holes. Since holes 102 and 104 as well as holes 106 and 108 are in linear alignment with each other along the length of plate 70, holes 102 and 104 are respectively spaced from holes 106 and 108 the same distance, namely having 2.68 inches between the center points of the each of the corresponding holes as shown in FIG. 13.

In order to accommodate quick release pucks or inner plates of the Quest series of trolling motor available from Minn Kota® in addition to the trolling motor brackets noted for plate 70, plate 110 shown in FIG. 14 was developed. As shown, portion 118 of plate 110 includes sets of four holes 80, 90 and 100 as described in reference to plate 70 in FIG. 13. The description of size and placement of the holes in such sets are referenced from FIG. 13 but are not reiterated

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for the sake of brevity. In addition to such sets of holes, portion 118 of plate 110 includes a set of three holes 120 and a set of three holes 130, making up a set of six holes of the same size as each other but larger size than the first and second sets of four holes 80 and 90. In particular, plate 110 includes holes 122, 124, 126, 132, 134 and 136 each having a diameter of 0.375 inches. As shown in FIG. 14, holes 122, 124, 126, 132, 134 and 136 are disposed outside an area of the plate bounded by the first and second sets of four holes 80 and 90. As further shown in FIG. 14, holes 122, 124 and 126 have their center points 5.38 inches apart and linearly aligned parallel with the first set of four holes 80. Moreover, holes 132, 134 and 136 are in respective alignment with holes 122, 124 and 126 as taken along the width of the plate. In addition, holes 132, 134 and 136 respectively have a center point spaced 5.25 inches from a center point of holes 122, 124 and 126 as taken along the width of the plate.

It is noted that portion 116 of plate 110 may have the same options of holes as described for portion 76 of plate 70 in FIG. 13. The description of such options is referenced from FIG. 13 but are not reiterated for the sake of brevity. It is noted that when portion 116 includes hole 112 for accommodating a bolt used to provide rotation in a swivel element along with an accompanying bearing, portion 116 may optionally include indentation 114 around hole 112 for accompanying a head of a flat head bolt. The indentation may be beneficial for having the bolt head flush with the upper surface of plate 110, which may be beneficial for accommodating some trolling motor brackets that may extend into portion 116 of plate 110. Such a feature may be included in any of the mounting members of the swivel mounts disclosed herein and, thus, is not exclusive to plate 110 in FIG. 14. In particular, such an indentation feature may be included in top plate 4, top plate 50 or top plate 60 respectively described in reference to FIGS. 1, 11 and 12. In addition, an indentation feature may be included in plate 140 described in reference to FIG. 15 below.

In order to accommodate quick release pucks or inner plates of Move Offshore trolling motor available from Power Pole in addition to the trolling motor brackets noted for plates 70 and 110, plate 140 shown in FIG. 15 was developed. As shown, portion 148 of plate 140 includes sets of four holes 80, 90 and 100 as described in reference to plate 70 in FIG. 13 as well as sets of three holes 120 and 130 as described in reference to plate 110 in FIG. 14. The descriptions of size and placement of the holes in such sets are referenced from FIGS. 13 and 14 but are not reiterated for the sake of brevity. In addition to such sets of holes, portion 148 of plate 140 includes holes 152, 154, 156 and 158 of the same size as each other but larger size than the first and second sets of four holes 80 and 90. In particular, holes 152, 154, 156 and 158 each have a diameter of 0.375 inches. As shown in FIG. 15, holes 152 and 154 have their center points 9.00 inches apart and linearly aligned parallel with the first set of four holes 80. Moreover, holes 152 and 154 are in respective alignment with holes 156 and 158 as taken along the width of the plate. In addition, holes 152 and 154 respectively have a center point spaced 2.876 inches from a center point of holes 156 and 158 as taken along the width of the plate.

It is noted that portion 146 of plate 140 may have the same options of holes as described for portion 116 of plate 110 in FIG. 14. The description of such options is referenced from FIG. 14 but are not reiterated for the sake of brevity. Furthermore, it is noted that the mounting members of the swivel mounts disclosed herein are not restricted to the combination of holes disclosed for each of the plates

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described in reference to FIGS. 13-15 or shown in FIGS. 1, 11 and 12. Rather any combination of sets of holes may be considered for a plate, depending on the trolling motor that is desired to be accommodated. Furthermore, any of plates 70, 110, and 140 may have additional holes for accommodating quick release mounting pucks or inner plates of any other trolling motor. As such, the swivel mounts considered herein are not restricted to the depiction of the drawings.

It will be appreciated to those skilled in the art having the benefit of this disclosure that this invention is believed to provide swivel mounts for attaching and maneuvering accessories, such as but not limited to trolling motors, on to and over the gunnel of a boat or any other mounting surfaces. Further modifications and alternative embodiments of various aspects of the invention will be apparent to those skilled in the art in view of this description. For example, although the disclosure emphasizes swivel mounts for trolling motors, the scope of their use is not necessarily so limited. In particular, the swivel mounts disclosed herein may be considered for accessories other than trolling motors and applications other than boating. Accordingly, this description is to be construed as illustrative only and is for the purpose of teaching those skilled in the art the general manner of carrying out the invention. It is to be understood that the forms of the invention shown and described herein are to be taken as the presently preferred embodiments. Elements and materials may be substituted for those illustrated and described herein, parts and processes may be reversed, and certain features of the invention may be utilized independently, all as would be apparent to one skilled in the art after having the benefit of this description of the invention. Changes may be made in the elements described herein without departing from the spirit and scope of the invention as described in the following claims. The term "approximately" as used herein refers to variations of up to +/-5% of the stated number. The term "coupled" as used herein refers to items being indirectly or directly connected to each other. Indirectly connected means the items are not touching each other, while directly connected means the items are touching each other.

What is claimed is:

1. A swivel mount, comprising:

an elongated mounting plate comprising first and second opposing faces spaced apart by one or more peripheral sidewalls;

a support plate comprising first and second opposing faces spaced apart by one or more peripheral sidewalls,

wherein the support plate has a length less than or equal to half a length of the elongated mounting plate; and a swivel element, wherein the swivel mount is configured for the elongated mounting plate, the support plate, and swivel element to be coupled together such that:

the first faces of the support plate and the elongated mounting plate are parallel;

the swivel element, the support plate, and the elongated mounting plate at least partially overlap each other; and

the swivel element is arranged such that the elongated mounting plate is able to swivel 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.

2. The swivel mount of claim 1, further comprising a locking pin for securing the elongated mounting plate in a

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set position relative to the support plate when the swivel element, the support plate, and the elongated mounting plate are coupled together.

3. The swivel mount of claim 2, wherein the locking pin extends from the second face of the elongated mounting plate when the swivel element, the support plate, and the elongated mounting plate are coupled together.

4. The swivel mount of claim 1, wherein the elongated mounting plate comprises:

a first portion 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; and

a second portion cantilevered from the first portion when the swivel element, the support plate, and the elongated mounting plate are coupled together.

5. The swivel mount of claim 4, wherein the second portion comprises a plurality of holes for receiving a plurality of bolts to secure an object to the second portion of the elongated mounting plate.

6. The swivel mount of claim 5, wherein a number and arrangement of the plurality of holes are such that different types of trolling motor mounting brackets may be secured to the second portion of the elongated mounting plate via a plurality of bolts.

7. The swivel mount of claim 4, wherein the second portion comprises a sliding track for slidably receiving an object to the second portion of the elongated mounting plate.

8. A boat, comprising:

a gunnel;

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, wherein the swivel mount comprises a support member fastened to the upward facing surface of the gunnel via one or more bolts or screws through the upward facing surface of the gunnel; and a trolling motor mounting bracket coupled to an upward facing surface of the mounting member.

9. The boat of claim 8, wherein the swivel mount further comprises a reinforcement member fastened to an underside surface of the gunnel and coupled to the support member.

10. The boat of claim 8, wherein the swivel mount comprises a base member adhered to the upward facing surface of the gunnel under the mounting member.

11. The boat of claim 8, wherein upward facing surface of the gunnel has a width greater than 4 inches.

12. The boat of claim 8, wherein the boat is a saltwater fishing boat.

13. The boat of claim 8, wherein the trolling motor mounting bracket comprises a trolling motor deploy/stow mechanism.

14. The boat of claim 8, wherein the trolling motor mounting bracket is a trolling motor quick-release mounting bracket.

15. The swivel mount of claim 5, wherein the plurality of holes comprises:

a first set of four holes of the same size in linear alignment with each other along the length of the elongated mounting plate; and

a second set of four holes of the same size as the first set of four holes and in linear alignment with each other along the length of the elongated mounting plate, wherein each of the second set of four holes is respectively in alignment with a different hole of the first set

20

of four holes as taken along a width of the elongated mounting plate, wherein each of the second set of four holes has a center point spaced 2.88 inches from a center point of its respective different hole of the first set of four holes, and wherein the first and second sets of four holes each comprise:

a first hole disposed closest to an end of the elongated mounting plate;

a second hole having a center point disposed 4.5 inches from a center point of the first hole of its respective set of four holes in a direction away from the end of the elongated mounting plate;

a third hole having a center point disposed 3.5 inches from the center point of the second hole of its respective set of four holes in a direction away from the end of the elongated mounting plate; and

a fourth hole having a center point disposed 1.0 inch from the center point of the third hole of its respective set of four holes in a direction away from the end of the elongated mounting plate.

16. The swivel mount of claim 15, further comprising a third set of four holes of the same size as each other but larger size than the first and second sets of four holes, wherein the third set of four holes are disposed within an area of the elongated mounting plate bounded by the first and second sets of four holes, and wherein the third set of four holes comprise:

a first set of two holes having their center points 5.75 inches apart and linearly aligned parallel with the first set of four holes; and

a second set of two holes each respectively in alignment with a different hole of the first set of two holes as taken along the width of the elongated mounting plate, wherein each of the second set of two holes has a center point spaced 2.68 inches from a center point of its respective different hole of the first set of two holes.

17. The swivel mount of claim 15, further comprising a set of six holes of the same size as each other but larger size than the first and second sets of four holes, wherein the set of six holes are disposed outside an area of the elongated mounting plate bounded by the first and second sets of four holes, and wherein the set of six holes comprise:

a first set of three holes having their center points 5.38 inches apart and linearly aligned parallel with the first set of four holes; and

a second set of three holes each respectively in alignment with a different hole of the first set of three holes as taken along the width of the elongated mounting plate, wherein each of the second set of two holes has a center point spaced 5.25 inches from a center point of its respective different hole of the first set of two holes.

18. The swivel mount of claim 15, further comprising a third set of four holes of the same size as each other but larger size than the first and second sets of four holes, wherein the third set of four holes comprise:

a first set of two holes having their center points 9.00 inches apart and linearly aligned parallel with the first set of four holes; and

a second set of two holes each respectively in alignment with a different hole of the first set of two holes as taken along the width of the elongated mounting plate, wherein each of the second set of two holes has a center point spaced 2.876 inches from a center point of its respective different hole of the first set of two holes.

\* \* \* \* \*

EXHIBIT A

Representative Claim Chart for U.S. Pat. No. 12,258,111

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

| 12,258,111                                            | Sea Swivel                 | Infringing Product<br>Rhodan SRQ Mount |
|-------------------------------------------------------|----------------------------|----------------------------------------|
| <p><b>Claim 1</b><br/>A swivel mount, comprising:</p> | <p>1/10</p> <p>FIG. 12</p> |                                        |

EXHIBIT B

Representative Claim Chart for U.S. Pat. No. 12,258,111

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

| 12,258,111                  | Infringing Product<br>SRQ Rhodan Mount (the “SRQ Mount”)                                                                                                                                             |
|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Claim 1                     |                                                                                                                    |
| A swivel mount, comprising: | <p data-bbox="607 1020 1390 1081">As shown in the picture below the infringing SRQ Mount is a swivel mount.</p>  |

EXHIBIT B

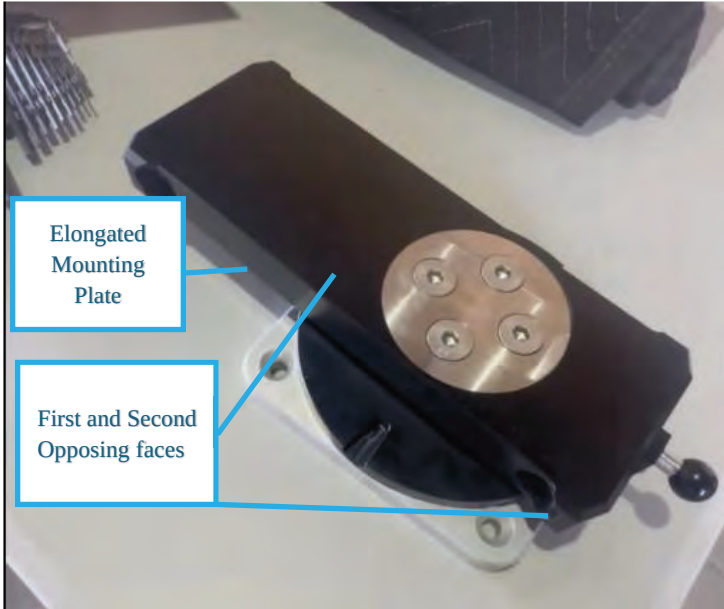
|                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>[1a]</b> An Elongated Mounting Plate comprising first and second opposing faces spaced apart by one or more peripheral sidewalls;</p>                                                                                                     | <p>As shown in the picture below the SRQ Mount features a long rectangular plate along with a top face and bottom face that are spaced by rotating locking flange.</p>  <p>The long rectangle plate is covered by the '111 patent as the elongated mounting plate because it has opposing faces (the top and bottom face) that are separated by multiple peripheral sidewalls.</p> |
| <p><b>[1b]</b> A support Plate comprising first and second opposing faces spaced apart by one or more peripheral sidewalls, wherein the support plate has a length less than or equal to half a length of the elongated mounting plate; and</p> | <p>As shown in the picture below the SRQ Mount features a circular plate which is half the length of the elongated mounting plate, has a top face and bottom face, and the top and bottom faces are spaced by one circular sidewall.</p>                                                                                                                                                                                                                             |

EXHIBIT B

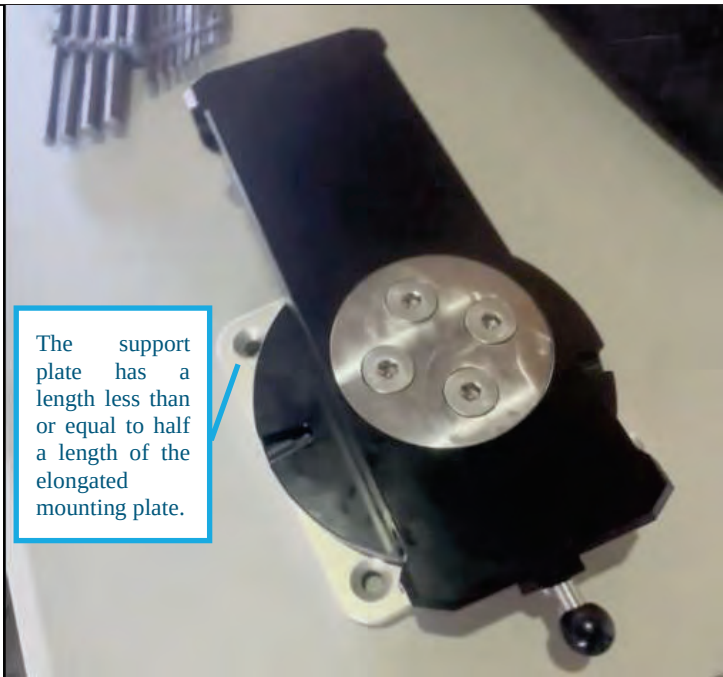
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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  <p>The support plate has a length less than or equal to half a length of the elongated mounting plate.</p> <p>The base plate of the SRQ Mount is covered by the '111 patent as a "supported plate." Specifically, the length of the base plate is significantly less than the length of the mounting plate (exact length of the base plate is unclear from photo or produce dimensions) and the '111 patent covers a support plate is less than half the length of the mounting plate. Moreover, the '111 patent covers the top and bottom faces separated by the one circular sidewall.</p> |
| <p><b>[1c]</b> A swivel element wherein the swivel mount is configured for the elongated mounting plate, the support plate, and swivel element to be coupled together such that: the swivel element is arranged such that the elongated 'mounting plate is able to swivel 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.</p> | <p>As shown in the picture below the SRQ Mount features a "rotating plate" which can rotate the <u>swivel element</u> about an axis attached to the support plate.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

EXHIBIT B

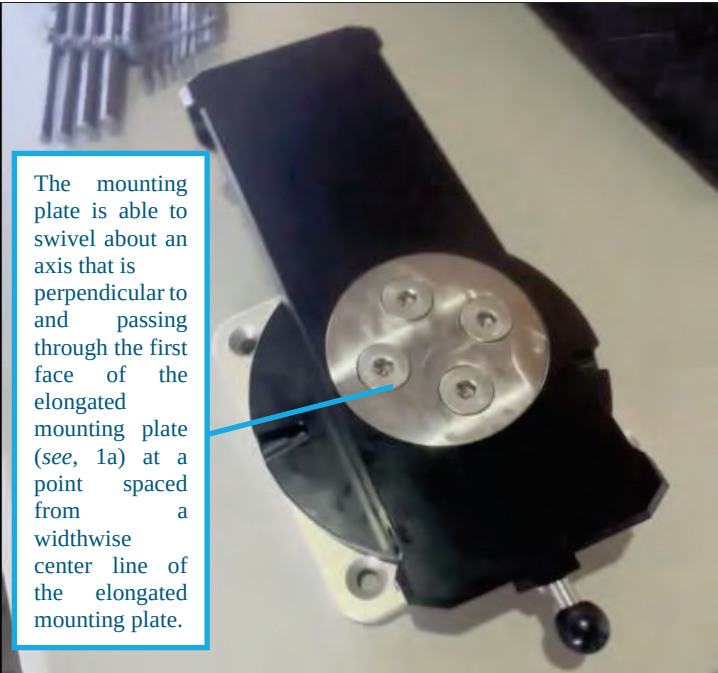
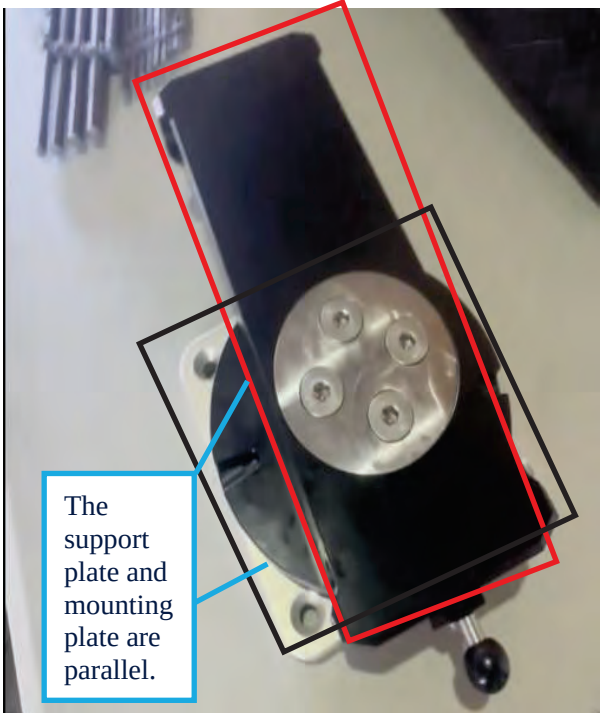
|                                                                                                         |                                                                                                                                                                                                                                                                                                                                    |
|---------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                         |  <p>The mounting plate is able to swivel about an axis that is perpendicular to and passing through the first face of the elongated mounting plate (see, 1a) at a point spaced from a widthwise center line of the elongated mounting plate.</p> |
| <p><b>[1d]</b> the first faces of the support plate and the elongated 'mounting plate are parallel;</p> | <p>As shown in the picture below the SRQ Mount features a support plate and elongated mounting plate are parallel.</p>  <p>The support plate and mounting plate are parallel.</p>                                                              |

EXHIBIT B

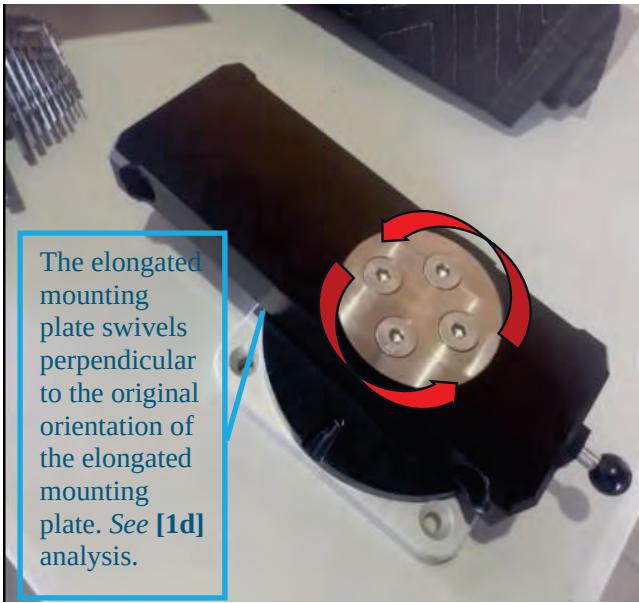
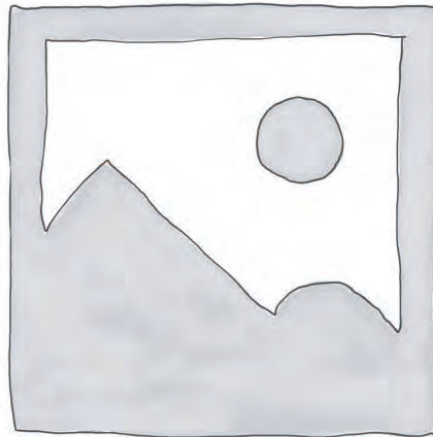
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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                      |
| <p><b>[1e]</b> the swivel element, the support plate, and the elongated 'mounting plate at least partially overlap each other; and</p>                                                                                                                                                                | <p>As shown in the picture below and in the <b>[1d]</b> analysis, the SRQ Mount features a support plate and elongated mounting plate which overlap each other.</p>                                                |
| <p><b>[1f]</b> the swivel element is arranged such that the elongated 'mounting plate is able to swivel 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.</p> | <p>As shown in the picture below the SRQ Mount features an elongated mounting plate which swivels perpendicular to the original orientation of the elongated mounting plate, as covered by the '111 patent.</p>  |

EXHIBIT B

Precision GPS Technology ... The Ultimate Fishing Companion

 (/cart)  (<https://www.facebook.com/RhodanTrollingMotors/>)  (<https://www.instagram.com/rhodanmarine/>)

<https://www.rhodanmarine.com/product-category/accessories/> > SRQ Brackets (Sliding, Rotating, Quick Release)



## SRQ Brackets (Sliding, Rotating, Quick Release)

\$499.99

Out of stock



[Privacy](#) - [Terms](#)

EXHIBIT C

<https://www.rhodanmarine.com/product/srq-brackets-sliding-rotating-quick-release/>

1/6

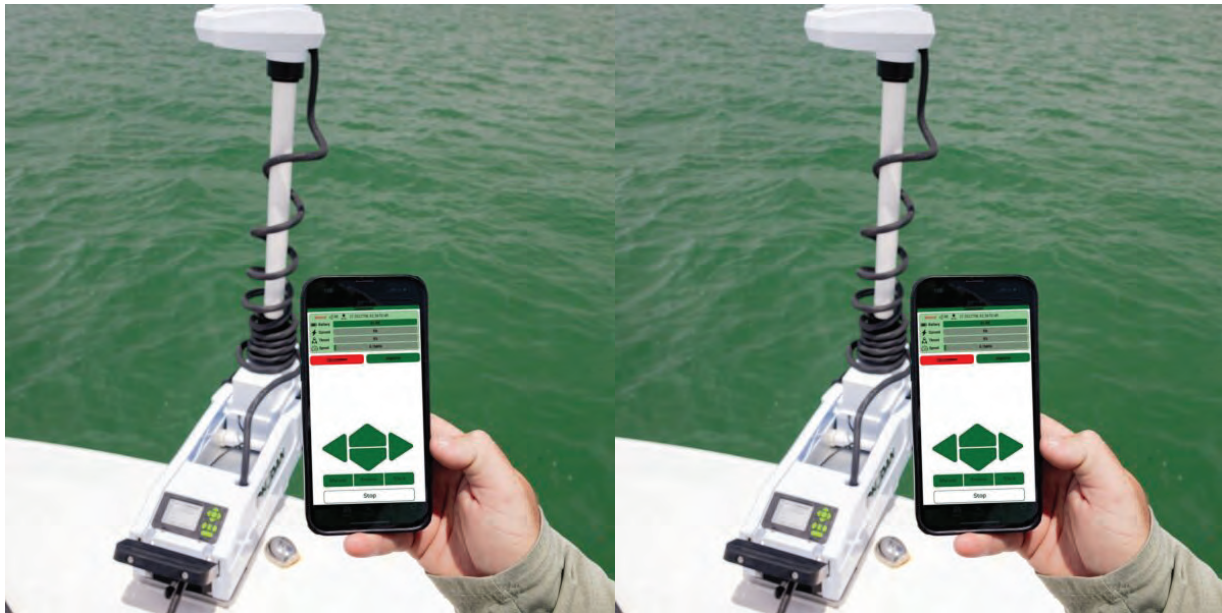
## Description

### SRQ Brackets (Sliding, Rotating, Quick Release)

Elevate your boating experience with Rhodan Marine's SRQ Brackets, expertly designed for versatility and convenience. These innovative Sliding, Rotating, and Quick Release brackets offer unmatched flexibility for mounting your trolling motor. Crafted from durable, corrosion-resistant materials, SRQ Brackets allow seamless sliding and 360-degree rotation to position your motor precisely where you need it, while the quick-release mechanism ensures effortless removal and storage. Ideal for boats with challenging bow configurations, the SRQ system extends reach to the waterline and retracts fully within the hull to avoid interference with trailers, docks, or covers. Engineered for both freshwater and saltwater environments, SRQ Brackets are built to withstand harsh marine conditions, providing reliable performance and easy installation. Optimize your deck space and enhance your trolling motor's functionality with Rhodan's SRQ Brackets—the ultimate solution for precision and durability on the water.

*\*Only compatible with Rhodan Gen5 motors!*

## You may also like...



#### GEN 5 – Rhodan's Newest Model – 24V

\$3,599.99 – \$3,799.99

(<https://www.rhodanmarine.com/product/gen-v-rhodans-newest-model-24v/>)

#### GEN 5 – Rhodan's Newest Model – 36V

\$3,999.99 – \$5,399.99

(<https://www.rhodanmarine.com/product/gen-v-rhodans-newest-model-36v/>)

SELECT OPTIONS (<https://www.rhodanmarine.com/product/gen-v-rhodans-newest-model-24v/>) SELECT OPTIONS (<https://www.rhodanmarine.com/product/gen-v-rhodans-newest-model-36v/>)



EXHIBIT C

<https://www.rhodanmarine.com/product/srq-brackets-sliding-rotating-quick-release/>

2/6



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F: (305) 718-6787  
albert@epgdlaw.com

June 25, 2025

**SENT VIA U.S. CERTIFIED MAIL AND EMAIL**

**RHODAN MARINE SYSTEMS OF FLORIDA, LLC**

Lindsay Ambler

President and Chief Executive Officer

1290 Sarasota Center Blvd

Sarasota, FL 34240

Email: [lambler@rhodanmarine.com](mailto:lambler@rhodanmarine.com)

**Re: Sea Swivel's Intellectual Property Rights  
Cease and Desist to Rhodan Marine as to the "SRQ Bracket"**

Dear Mr. Ambler:

The undersigned and the law firm of EPGD represent SEA SWIVEL INC ("Sea Swivel") in connection with its intellectual property litigation matters. For that reason, your conduct has been brought to our attention for review.

As you know, Sea Swivel markets and sells the Sea Swivel motor mount and is the owner of U.S. Patent No. 12,258,111, entitled *Swivel mounts for attaching and maneuvering accessories over the gunnel of a boat or any other mounting surface* (the "Sea Swivel Patent" or the "Patent"). A copy of the Sea Swivel Patent is enclosed as **Exhibit "A"** and fully incorporated by reference herein.

Sea Swivel has invested significant time, resources, and capital into developing its products and intellectual property, earning a reputation for innovation and top-quality manufacturing. The Sea Swivel Patent exists to protect these advancements from unauthorized use—precisely the kind of misuse Rhodan is attempting with its offering of the SRQ Brackets<sup>1</sup>.

The *Sea Swivel Patent* is comprised of a swivel mount disposed above an upward surface of the boat gunnel comprising of and among other things, the following:

- a) a swivel mount, comprising: **an elongated mounting plate comprising first and second opposing faces** spaced apart by one or more peripheral sidewalls; **a support plate comprising first and second opposing faces** spaced apart by one or more peripheral sidewalls, wherein the **support plate has a length less than or equal to half a length of the elongated mounting**

---

<sup>1</sup> See, Rhodan's Offering of the SRQ Bracket for \$499.99: [https://www.rhodanmarine.com/product/srq-brackets-sliding-rotating-quick-release/?srsltid=AfmBOop95fG9vDpEAn8\\_wT271q0dC7I48QwbwDpkqrqBNjYnkXBm4PiI](https://www.rhodanmarine.com/product/srq-brackets-sliding-rotating-quick-release/?srsltid=AfmBOop95fG9vDpEAn8_wT271q0dC7I48QwbwDpkqrqBNjYnkXBm4PiI)

EXHIBIT D

*Sea Swivel's Intellectual Property Rights  
Cease and Desist to Rhodan Marine*  
Page 2 of 3

- plate*; and a *swivel element, wherein the swivel mount is configured for the elongated mounting plate*, the support plate, and swivel element to be coupled together such that: the first faces of the support plate and the elongated mounting plate are parallel; *the swivel element, the support plate, and the elongated mounting plate at least partially overlap each other*; and the swivel element is arranged such that *the elongated mounting plate is able to swivel 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; and
- b) wherein the swivel mount comprises a support member fastened to the upward facing *surface of the gunnel via one or more bolts or screws through the upward facing surface of the gunnel*; and a *trolling motor mounting bracket coupled to an upward facing surface of the mounting member*.

It has come to our attention that RHODAN MARINE (“Rhodan”) is infringing upon certain claims of *Sea Swivel Patent* in violation of Section 27 of the Patent Act. Specifically, without authority of Sea Swivel, Rhodan is directly utilizing and infringing upon Sea Swivel’s exclusive proprietary and patent rights through its offer and utilization of the “SRQ Brackets (sliding, rotating, quick release)” (the “SRQ Bracket”). Rhodan’s utilization of the SRQ Bracket is a commercialization and direct infringement of *Sea Swivel’s Patent*—particularly Sea Swivel’s primary use as a trolling motor mount device capable of rotating while mounted to the upward gunnel of the boat.

Patent infringement is a serious matter, and Sea Swivel expects third parties such as Rhodan to respect Sea Swivel’s patent rights. However, the extent and context of Rhodan’s activities clearly establish that the infringement of the *Sea Swivel Patent* is willful. As such, Rhodan may be liable for enhanced damages and attorneys’ fees incurred by Sea Swivel to enforce its rights. Attached hereto as **Exhibit “B”** is Sea Swivel’s claim chart depicting specific and direct infringements between the *Sea Swivel Patent* and the SRQ Bracket.

Whoever infringes a patent is in violation of Federal Law, United States Code Title 35, Section 271, and subject to suit in Federal Court. 35 United States Code Section 281. The Court has the power to issue an injunction (35 U.S.C. 283) shutting down any sales of infringing product and award damages to the patent owner in an amount that is no less than a reasonable royalty (35 U.S.C. 284). In the case of willful infringement, the Court is authorized by statute to treble the actual damages amount and even require the infringer to pay the patent owner’s attorney fees. Such fees can actually exceed the total infringement damages in the event of small total sales volume.

Furthermore, Rhodan shall also be aware of 15 U.S.C. 1125 (Section 43 of the Lanham Act) which prohibits deceptive and false representations and advertising. Rhodan’s advertising claims related to the SRQ Bracket expose it to the risk of heavy penalties including, but not limited to, monetary damages, punitive damages, treble damages, award of attorneys’ fees, and injunctive relief, all distinct from the remedies available for patent infringement. Rhodan’s claim that its SRQ

EXHIBIT D

*Sea Swivel's Intellectual Property Rights  
Cease and Desist to Rhodan Marine*  
Page 3 of 3

Bracket is "innovative Sliding, Rotating, and Quick Release . . . offer *unmatched flexibility* for mounting your trolling motor" is both deceptive and false which is intended to damage Sea Swivel.

**Accordingly, regarding the Patent, Sea Swivel therefore demands that Rhodan immediately cease its infringing activities by discontinuing the utilization and commercialization without authorization of Sea Swivel's patent via the SRQ Bracket or any other variant and desists from such infringing activity now and in the future and comply with Sea Swivel's requirements as set out in its Patent and this letter. In addition, Sea Swivel demands that Rhodan provide Sea Swivel with sufficient information to determine the extent of Rhodan's infringement, including all proceeds derived therefrom, and suitable damages for the infringement. Furthermore, Sea Swivel demands that Rhodan promptly provide Sea Swivel with written confirmation that Rhodan will comply with these demands.**

Rhodan is specifically advised that any failure or delay in complying with these demands may compound the damages for which Rhodan may be liable. If Sea Swivel does not receive a satisfactory written response to these demands by the close of business **(5:00 p.m. EST) on Monday July 7, 2025**, Sea Swivel is prepared to take any and all necessary steps, at law and in equity, to protect its valuable intellectual property rights, without further notice to Rhodan, including the filing of an action and seeking an emergency injunction against Rhodan to prevent imminent harm and irreparably injury towards Sea Swivel.

Nothing in this letter shall be construed to constitute an express or implied waiver of any rights or remedies that Sea Swivel may have or hereafter obtain in connection with this matter, all of which are hereby expressly reserved. In addition to the aforementioned, allow for this letter to serve as notice that you are not to destroy, conceal or alter any electronic data or communications procured in relation to this matter, including, but not limited to, emails, correspondence, and any and all forms of communication. As you know, your failure to comply with this notice can result in severe sanctions being imposed by the Court for the spoliation of evidence or potential evidence.

We trust that you will comply with the requests set forth above, including your written confirmation as set forth herein.

Sincerely,

*/s/ Albert D. Sabater*

For the Firm

Enclosures:  
U.S. Patent No. 12,258,111  
Sea Swivel/ SRQ Bracket Claim Chart

EXHIBIT D

**Representative Claim Chart for U.S. Pat. No. 12,258,111**

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

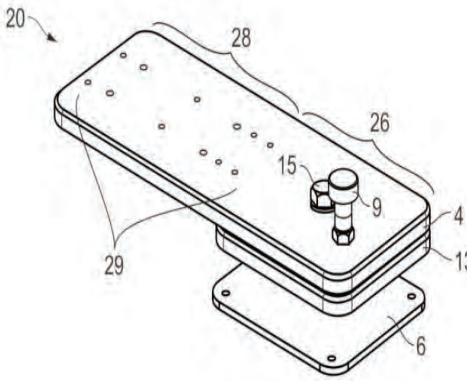
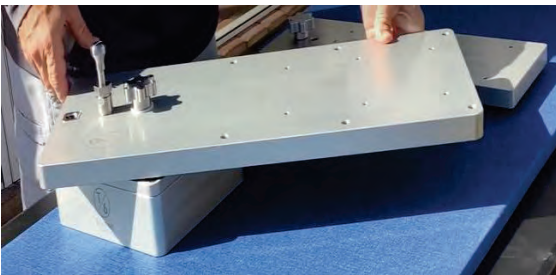
| 12,258,111                                            | Sea Swivel                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Infringing Product<br>BOSS 360 and Mini BOSS 360                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Claim 1</b><br/>A swivel mount, comprising:</p> | <p>1/10</p>  <p>The drawing shows a perspective view of a swivel mount assembly. It includes a base plate (6) with a central pivot point (9). A top plate (20) is mounted on the base plate via a series of rollers or bushings (15). The top plate has a rectangular shape with rounded corners and a series of mounting holes (28). A bracket (26) is attached to the top plate, and a handle (29) is attached to the bracket. A locking mechanism (4) is shown on the side of the top plate, which includes a pin (13) and a spring (14).</p> |  <p>The photograph shows two physical products, the BOSS 360 and Mini BOSS 360, which are swivel mounts. They are made of a light-colored material, possibly aluminum, and have a rectangular shape with rounded corners. The BOSS 360 is shown in the foreground, and the Mini BOSS 360 is shown in the background. Both products have a central pivot point and a handle for adjustment.</p> |

EXHIBIT E

**Representative Claim Chart for U.S. Pat. No. 12,258,111**

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

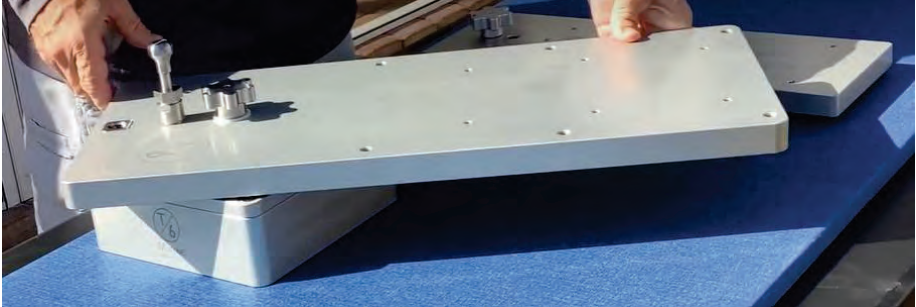
| 12,258,111                  | <b>Infringing Product</b><br><b>BOSS 360 and Mini BOSS 360 (collectively, the “BOSS 360 Mounts”)</b>                                                            |
|-----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Claim 1</b>              |                                                                               |
| A swivel mount, comprising: | <p>As shown in the picture below, the BOSS 360 Mount is a swivel mount.</p>  |

EXHIBIT E

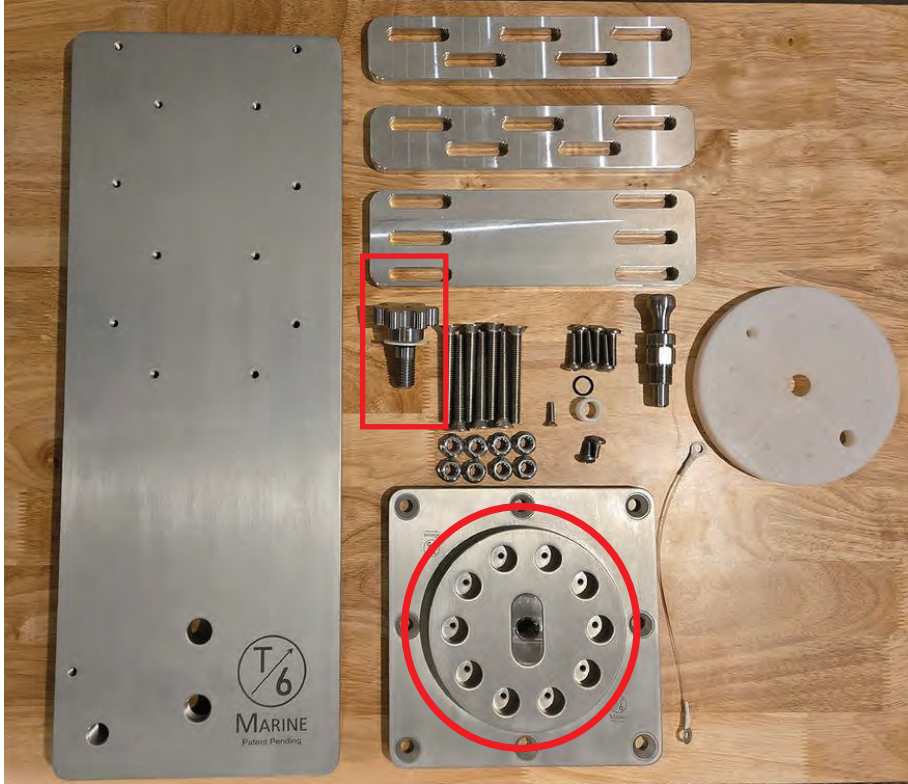
|                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                             |  <p>The image above suggests that the mount does allow for the plate to swivel about an axis, making the Boss 360 Mount a swivel mount. Additionally, T6 Marine's website describes it as "the BOSS 360 at T/6 Marine, the ultimate <b>360 rotating quick release trolling motor mount</b> designed for precision and convenience."</p> |
| <p><b>[1a]</b> An Elongated Mounting Plate comprising first and second opposing faces spaced apart by one or more peripheral sidewalls;</p> | <p>As shown in the picture below the BOSS 360 Mount features a long rectangle plate with a top face and a bottom face that are spaced by four sidewalls.</p>                                                                                                                                                                           |

EXHIBIT E

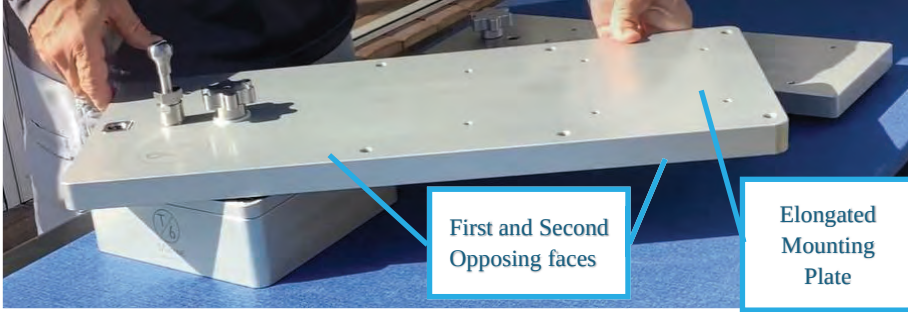
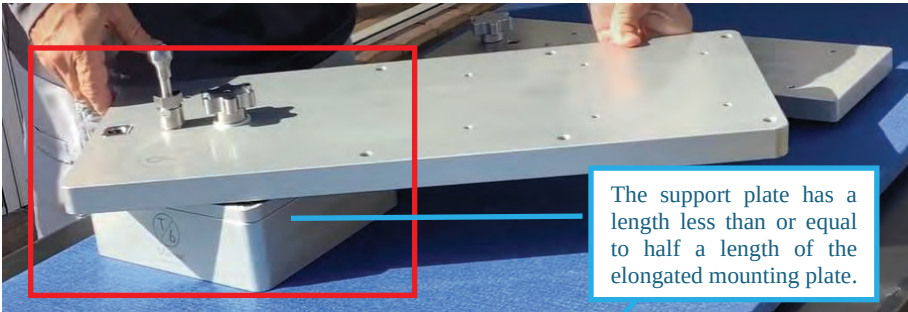
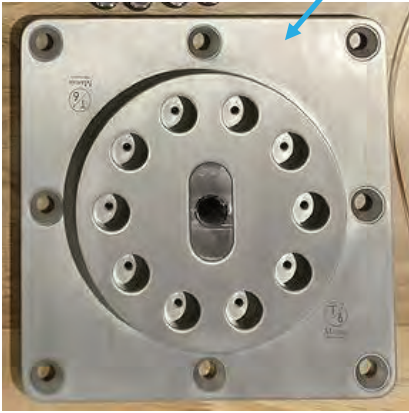
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|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                   |  <p>The long rectangle plate is covered by the '111 patent as the elongated mounting plate because it has opposing faces (the top and bottom face) that are separated by multiple peripheral sidewalls.</p>                                                                                                                                                                                                                                                                                                                            |
| <p><b>[1b]</b> A supported Plate comprising first and second opposing faces spaced apart by one or more peripheral sidewalls, wherein the support plate has a length less than or equal to half a length of the elongated mounting plate; and</p> | <p>As shown in the picture below the BOSS 360 Mount features a square plate with a top face and a bottom face that are spaced by four sidewalls and is about half or less of the length of the rectangle plate. Additionally, the T6 Marine's website describes that the BOSS 360 Mount is able to "[e]xtend[] the motor 19" out from the center of the base with the 8" wide trolling plate and 18" out with the 10" wide trolling plate."</p>   |

EXHIBIT E

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p>The square support plate is covered by the '111 patent as the supported plate because it has two opposing faces, <i>i.e.</i>, the top and bottom faces, and these faces are separated by multiple side walls. Further, the square plate is about half the length or less the length of the elongated mounting plate.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <p><b>[1c]</b> A swivel element wherein the swivel mount is configured for the elongated mounting plate, the support plate, and swivel element to be coupled together such that: the swivel element is arranged such that the elongated 'mounting plate is able to swivel 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.</p> | <p>As shown in the picture below the BOSS 360 Mount features a rotating plate which rests upon a mounting plate mounted on the upward facing gunnel of the boat. The images appear to be the swivel mechanism of the product, including the base plate and shown mounted on the upward gunnel of the boat.</p> <div data-bbox="446 569 1352 877" data-label="Image"> </div> <div data-bbox="976 743 1343 934" data-label="Text"> <p>The mounting plate is able to swivel about an axis that is perpendicular to and passing through the first face of the elongated mounting plate (see, 1a) at a point spaced from a widthwise center line of the elongated mounting plate.</p> </div> <div data-bbox="446 1005 937 1514" data-label="Image"> </div> <div data-bbox="1003 1335 1330 1663" data-label="Text"> <p>The rotating plate's configuration rests upon a rotating plate which is shown in the product image, description, or other promotional materials for the BOSS 360 Mounts, and thus resembles the swivel element of the '111 patent.</p> </div> |

EXHIBIT E

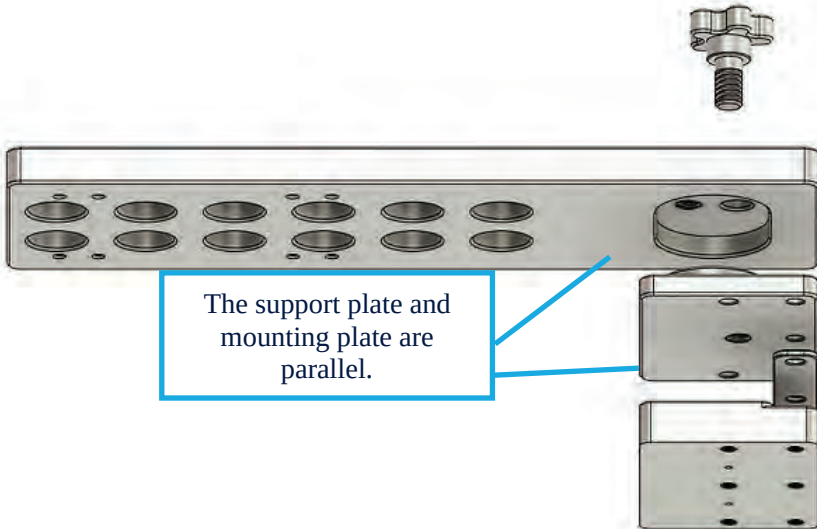
|                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <p><b>[1d]</b> the first faces of the support plate and the elongated 'mounting plate are parallel;</p>                                | <p>As shown in the picture below the BOSS 360 Mount features a rotating plate where the elongated mounting plate can be parallel to the support plate. The '111 patent covers the configuration in the image, because the elongated mounting plate is parallel to the support plate as claimed in the patent.</p>  <p>(shown above) showing the elongated mounting plate which is clearly parallel to the support plate.</p> |
| <p><b>[1e]</b> the swivel element, the support plate, and the elongated 'mounting plate at least partially overlap each other; and</p> | <p>As shown in the picture below the BOSS 360 Mount features a swivel element allowing for the elongated mounting plate and support plate can partially overlap one another.</p>                                                                                                                                                                                                                                                                                                                                |

EXHIBIT E

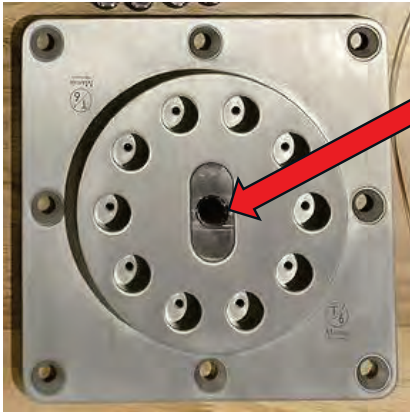
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|                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <p>[1f] the swivel element is arranged such that the elongated 'mounting plate is able to swivel 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.</p> | <p>As shown in the picture below and according to the T6 Marine website, the BOSS 360 Mount has a "10 position stop and can clock for another 15°" where it can rotate on an axis to achieve these positions.</p>  <p>Accordingly, for the BOSS 360 Mount to be held at the various degrees, as the product description advertises, the elongated mounting plate must swivel perpendicular to the original orientation of the elongated mounting plate, as covered by the '111 patent..</p> |

EXHIBIT E

[HOME](#)

[ABOUT](#)

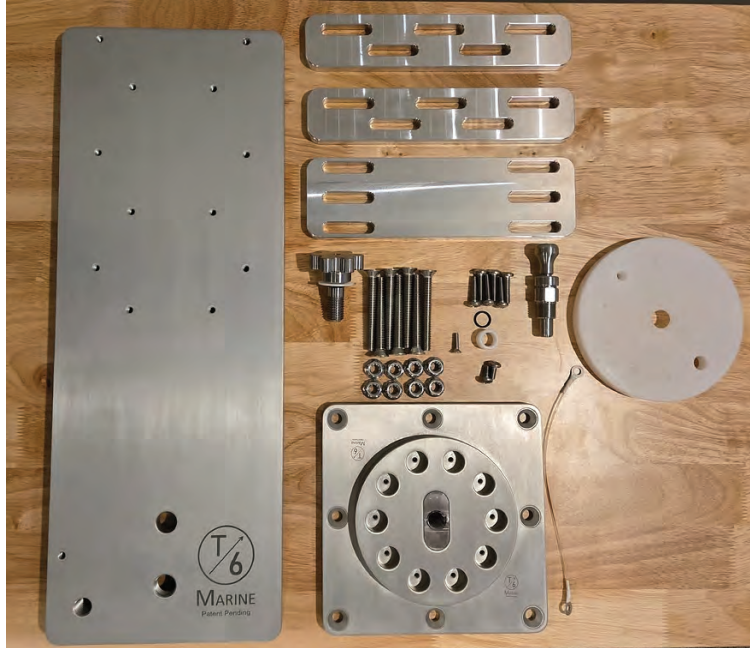
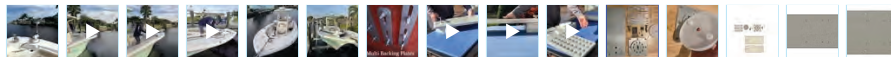
[SHOP](#)

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[Home](#) / [Quick Release Trolling Motor Mounts](#) / [BOSS 360 - 2 Week Leadtime](#)

[< Prev](#) | [Next >](#)



## BOSS 360 - 2 Week Leadtime

\$1,279.00

Trolling Plate Size \*

Select

Quantity \*

- 1 +

2 Weeks

Pre-Order



Discover the BOSS 360 at T/6 Marine, an ultimate 360 rotating quick release trolling motor mount designed for precision and convenience. It sports an 8" base with a robust multi-plate support, ensuring durability and stability. The trolling motor plate rotates smoothly on a 6" boss, making stowing and deploying a breeze. Our .625 316SS knob secures the trolling plate with confidence, offering 10 positions for optimal stow and deploy. Elevate your boating experience with the BOSS 360, where precision meets ease!

\* Material is 6061 Marine Grade Anodized Aluminum with integrated 316SS insert and knob

\* Videos contain optional 2.5" Riser

**\* Made in the USA**

**Why the BOSS 360**

- Extends the motor 19" out from the center of the base with the 8" wide trolling plate and 18" out with the 10" wide trolling plate
- 6" Boss to absorb rigorous side loading and jarring
- 1" thick top motor plate
- Built in Quick Release
- 10 position stop and can clock for another 15°
- .5" Thick multi backing plates that will fit in the tightest spots
  - as tight as 3.25" diameter
    - Consists of 2- 2" x 10" plates and a 3.24" x 10" plate
    - Easy Installation, Universal mount
- No mechanical bearings



Trolling Motor Fitment with 8" Plate

- Minn Kota
  - Ulterra, Terrova, PowerDrive, Pontoon Trolling Motor
  - MKA - 56 & RTA-55
- Rhodan
- Garmin
  - Kraken
- Lowrance
  - Recon
- PowerPole
  - PV
- MotorGuide
  - Xi3
  - Xi5

Trolling Motor Fitment with 10" Plate

- Minn Kota
  - Ulterra, Terrova, PowerDrive, Pontoon Trolling Motor
  - MKA - 56 & RTA-55
  - **Quest**
- Rhodan
- Garmin
  - Kraken
- Lowrance
  - Recon
- PowerPole
  - PV
- MotorGuide
  - Xi3
  - Xi5





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Miami, FL 33135  
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F: (305) 718-6787  
albert@epgdllaw.com

June 27, 2025

**SENT VIA U.S. CERTIFIED MAIL AND EMAIL**

DREAM MACHINE & PROTOTYPING, LLC

Attn: Scott M. Hilger

21958 Ellington Avenue

Glenwood, IA 51534

Email: [sales@t6marinesupply.com](mailto:sales@t6marinesupply.com)

T6 Marine

Attn: Scott M. Hilger

21958 Ellington Avenue

Glenwood, IA 51534

Email: [sales@t6marinesupply.com](mailto:sales@t6marinesupply.com)

**Re: Sea Swivel's Intellectual Property Rights  
Cease and Desist to T6 Marine as to the "BOSS 360," "Mini BOSS  
360," "ToonBOSS HD," and "ToonBOSS."**

Dear Mr. Hilger:

The undersigned and the law firm of EPGD represent SEA SWIVEL INC ("Sea Swivel") in connection with its intellectual property litigation matters. For that reason, your conduct has been brought to our attention for review.

As you know, Sea Swivel markets and sells the Sea Swivel motor mount and is the owner of U.S. Patent No. 12,258,111, entitled *Swivel mounts for attaching and maneuvering accessories over the gunnel of a boat or any other mounting surface* (the "Sea Swivel Patent" or the "Patent"). A copy of the Sea Swivel Patent is enclosed as **Exhibit "A"** and fully incorporated by reference herein.

Sea Swivel has invested significant time, resources, and capital into developing its products and intellectual property, earning a reputation for innovation and top-quality manufacturing. The Sea Swivel Patent exists to protect these advancements from unauthorized use—precisely the kind of misuse T6 is attempting with its offering of the BOSS 360, Mini BOSS 360, ToonBOSS HD, and ToonBOSS.<sup>1</sup>

The *Sea Swivel Patent* is comprised of a swivel mount disposed above an upward surface of the boat gunnel comprising of and among other things, the following:

- a) a swivel mount, comprising: **an elongated mounting plate comprising first and second opposing faces** spaced apart by one or more peripheral sidewalls; **a support plate comprising first and second opposing faces** spaced apart by one or more peripheral sidewalls, wherein the **support plate has a length less than or equal to half a length of the elongated mounting**

---

<sup>1</sup> See, T6's Offerings of the BOSS 360 Mounts: <https://www.t6marinesupply.com/category/trolling-motor-mounts>.

EXHIBIT G

*Sea Swivel's Intellectual Property Rights  
Cease and Desist to T6 Marine*  
Page 2 of 3

- plate; and a swivel element, wherein the swivel mount is configured for the elongated mounting plate, the support plate, and swivel element to be coupled together such that: the first faces of the support plate and the elongated mounting plate are parallel; the swivel element, the support plate, and the elongated mounting plate at least partially overlap each other; and the swivel element is arranged such that the elongated mounting plate is able to swivel 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; and*
- b) *wherein the swivel mount comprises a support member fastened to the upward facing surface of the gunnel via one or more bolts or screws through the upward facing surface of the gunnel; and a trolling motor mounting bracket coupled to an upward facing surface of the mounting member.*

It has come to our attention that T6 is infringing upon certain claims of the *Sea Swivel Patent* in violation of Section 27 of the Patent Act. Specifically, without authority of Sea Swivel, T6 is directly utilizing and infringing upon Sea Swivel's exclusive proprietary and patent rights through its offer and utilization of the BOSS 360, Mini BOSS 360, ToonBOSS HD, and ToonBOSS (the "BOSS 360 Mounts"). T6's utilization of the BOSS 360 Mounts is a commercialization and direct infringement of *Sea Swivel's Patent*—particularly Sea Swivel's primary use as a trolling motor mount device capable of rotating while mounted to the upward gunnel of the boat.

Patent infringement is a serious matter, and Sea Swivel expects third parties such as T6 to respect Sea Swivel's patent rights. However, the extent and context of T6's activities clearly establish that the infringement of the *Sea Swivel Patent* is willful. As such, T6 may be liable for enhanced damages and attorneys' fees incurred by Sea Swivel to enforce its rights. Attached hereto as **Exhibit "B"** is Sea Swivel's claim chart depicting specific and direct infringements between the *Sea Swivel Patent* and the BOSS 360 Mounts.

Whoever infringes a patent is in violation of Federal Law, United States Code Title 35, Section 271, and subject to suit in Federal Court. 35 United States Code Section 281. The Court has the power to issue an injunction (35 U.S.C. 283) shutting down any sales of infringing product and award damages to the patent owner in an amount that is no less than a reasonable royalty (35 U.S.C. 284). In the case of willful infringement, the Court is authorized by statute to treble the actual damages amount and even require the infringer to pay the patent owner's attorney fees. Such fees can actually exceed the total infringement damages in the event of small total sales volume.

Furthermore, T6 shall also be aware of 15 U.S.C. 1125 (Section 43 of the Lanham Act) which prohibits deceptive and false representations and advertising. T6's advertising claims related to the BOSS 360 Mounts expose it to the risk of heavy penalties including, but not limited to, monetary damages, punitive damages, treble damages, award of attorneys' fees, and injunctive relief, all distinct from the remedies available for patent infringement. T6's claim that its BOSS

EXHIBIT G

*Sea Swivel's Intellectual Property Rights  
Cease and Desist to T6 Marine*  
Page 3 of 3

360 Mounts is "the ultimate 360 rotating quick release trolling motor mount designed for precision and convenience" is both deceptive and false which is intended to damage Sea Swivel.

**Accordingly, regarding the Patent, Sea Swivel therefore demands that T6 immediately cease its infringing activities by discontinuing the utilization and commercialization without authorization of Sea Swivel's patent via the BOSS 360 Mounts or any other variant and desists from such infringing activity now and in the future and comply with Sea Swivel's requirements as set out in its Patent and this letter. In addition, Sea Swivel demands that T6 provide Sea Swivel with sufficient information to determine the extent of T6's infringement, including all proceeds derived therefrom, and suitable damages for the infringement. Furthermore, Sea Swivel demands that T6 promptly provide Sea Swivel with written confirmation that T6 will comply with these demands.**

T6 is specifically advised that any failure or delay in complying with these demands may compound the damages for which T6 may be liable. If Sea Swivel does not receive a satisfactory written response to these demands by the close of business **(5:00 p.m. EST) on Monday July 7, 2025**, Sea Swivel is prepared to take any and all necessary steps, at law and in equity, to protect its valuable intellectual property rights, without further notice to T6, including the filing of an action and seeking an emergency injunction against T6 to prevent imminent harm and irreparably injury towards Sea Swivel.

Nothing in this letter shall be construed to constitute an express or implied waiver of any rights or remedies that Sea Swivel may have or hereafter obtain in connection with this matter, all of which are hereby expressly reserved. In addition to the aforementioned, allow for this letter to serve as notice that you are not to destroy, conceal or alter any electronic data or communications procured in relation to this matter, including, but not limited to, emails, correspondence, and any and all forms of communication. As you know, your failure to comply with this notice can result in severe sanctions being imposed by the Court for the spoliation of evidence or potential evidence.

We trust that you will comply with the requests set forth above, including your written confirmation as set forth herein.

Sincerely,

*/s/ Albert D. Sabater*

For the Firm

Enclosures:  
U.S. Patent No. 12,258,111  
Sea Swivel/ BOSS 360 Mounts Claim Chart

EXHIBIT G

Representative Claim Chart for U.S. Pat. No. 12,258,111

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

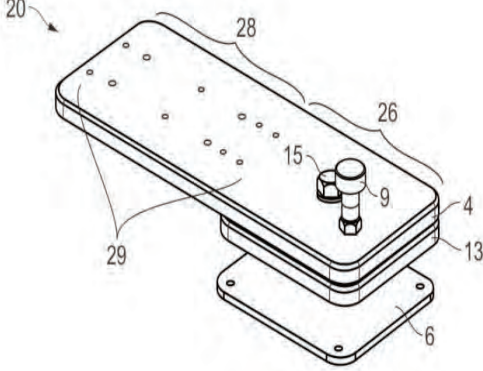
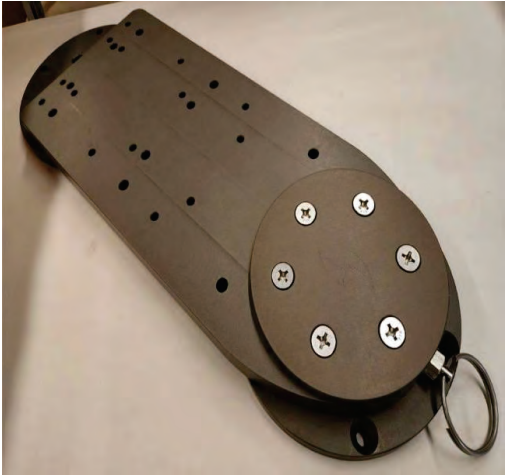
| 12,258,111                                            | Sea Swivel                                                                                    | Infringing Product<br>Shuttle Slide Rotating Mount                                 |
|-------------------------------------------------------|-----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|
| <p><b>Claim 1</b><br/>A swivel mount, comprising:</p> | <p>1/10</p>  |  |

EXHIBIT K

**Representative Claim Chart for U.S. Pat. No. 12,258,111**

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

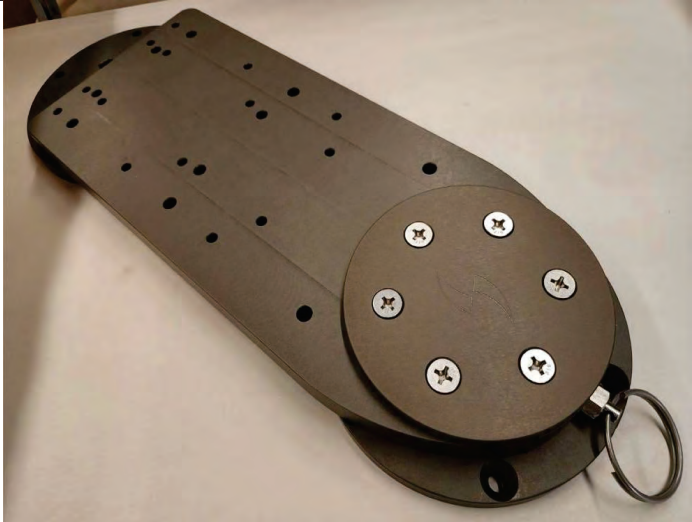
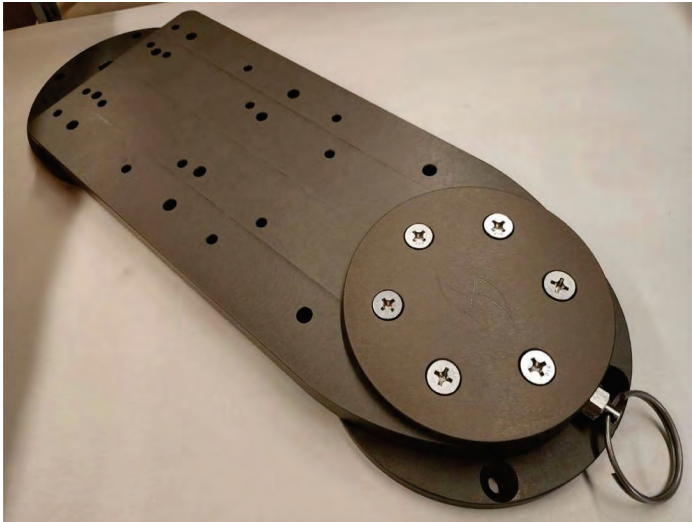
| 12,258,111                  | Infringing Product<br>Shuttle Slide (the “SS Rotating Mount”)                                                                                                                 |
|-----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Claim 1                     |                                                                                            |
| A swivel mount, comprising: | <p>As shown in the picture below the infringing SS Rotating Mount is a swivel mount.</p>  |

EXHIBIT K

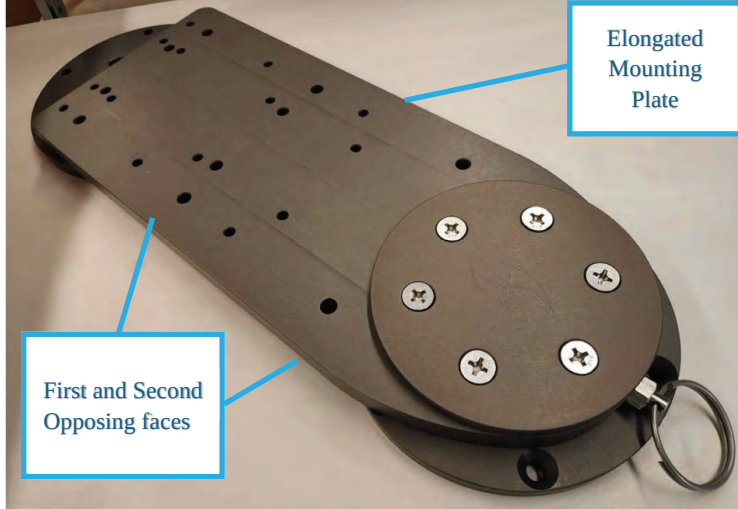
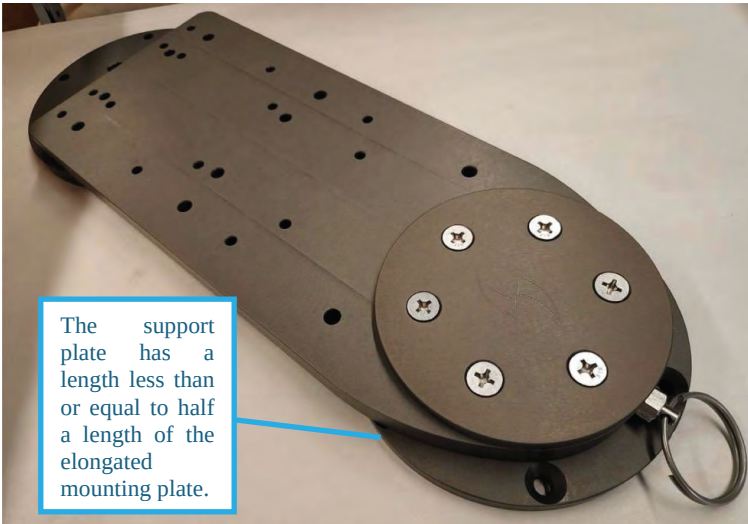
|                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                   | <p>Additionally, Shuttle Slide’s website product description defines the product as a mount that “rotates fully” allowing for the user to “pivot or swivel” the attached motor—making the Shuttle Slide a swivel mount.</p>                                                                                                                     |
| <p><b>[1a]</b> An Elongated Mounting Plate comprising first and second opposing faces spaced apart by one or more peripheral sidewalls;</p>                                                                                                       | <p>As shown in the picture below the SS Rotating Mount features a long rectangular plate which has a top face and bottom face that are spaced by the sidewalls.</p>                                                                                          |
| <p><b>[1b]</b> A supported Plate comprising first and second opposing faces spaced apart by one or more peripheral sidewalls, wherein the support plate has a length less than or equal to half a length of the elongated mounting plate; and</p> | <p>As shown in the picture below the SS Rotating Mount features a circular plate which is less than half the length of the elongated mounting plate, has a top face and bottom face, and the top and bottom faces are spaced by one circular sidewall.</p>  |

EXHIBIT K

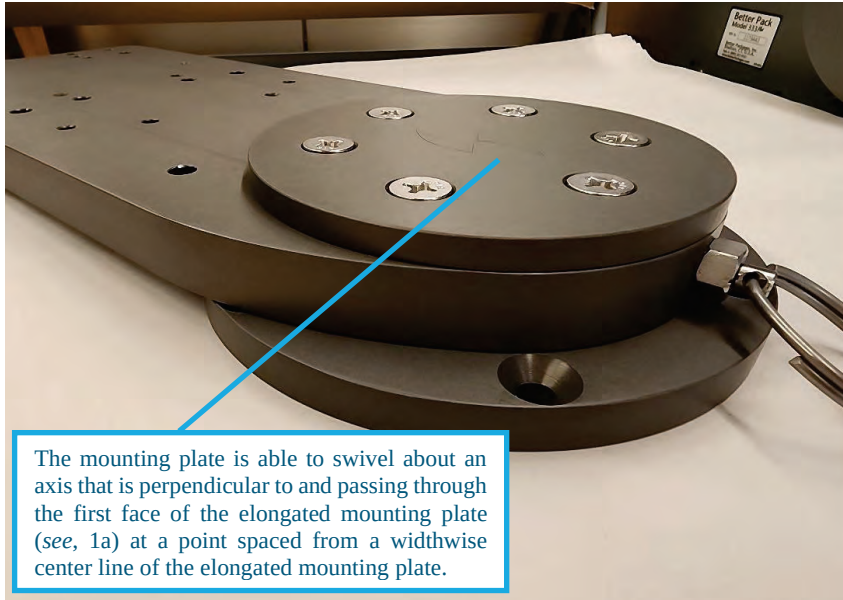
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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p>Additionally, the circular ‘base plate’ in the Shuttle Slide is covered by the ‘111 patent as a “supported plate.” Specifically, the length of the base plate is significantly less than the length of the mounting plate (exact length of the base plate is unclear from photo or produce dimensions) and the ‘111 patent covers a support plate is less than half the length of the mounting plate. Moreover, the ‘111 patent covers the top and bottom faces separated by the one circular sidewall.</p>                                                                           |
| <p><b>[1c]</b> A swivel element wherein the swivel mount is configured for the elongated mounting plate, the support plate, and swivel element to be coupled together such that: the swivel element is arranged such that the elongated ‘mounting plate is able to swivel 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.</p> | <p>As shown in the picture below the SS Rotating Mount features a rotating plate which its configuration rests upon a rotating plate which is shown in the product image, description, or other promotional materials for the SS Rotating Mount.</p>  <p>The mounting plate is able to swivel about an axis that is perpendicular to and passing through the first face of the elongated mounting plate (see, 1a) at a point spaced from a widthwise center line of the elongated mounting plate.</p> |
| <p><b>[1d]</b> the first faces of the support plate and the elongated ‘mounting plate are parallel;</p>                                                                                                                                                                                                                                                                                                                                                                 | <p>As shown in the picture below the SS Rotating Mount features a mount enabling it to be held at 0 degrees, as the product description advertises, the support plate and elongated mounting plate need to be parallel.</p>                                                                                                                                                                                                                                                                                                                                                              |

EXHIBIT K

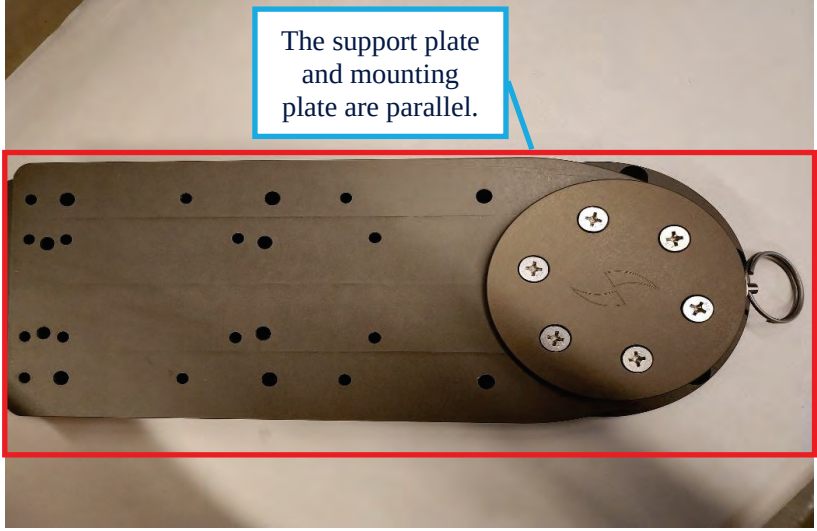
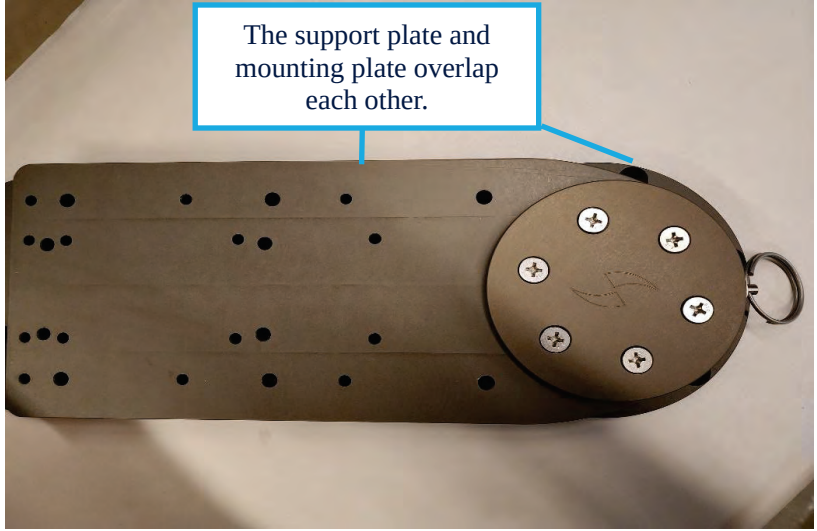
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|                                                                                                                                        |  <p>The support plate and mounting plate are parallel.</p>                                                                                                                                                                                                                             |
| <p><b>[1e]</b> the swivel element, the support plate, and the elongated 'mounting plate at least partially overlap each other; and</p> | <p>As shown in the picture below and in the <b>[1d]</b> analysis, the SS Rotating Mount features a support plate and elongated mounting plate which overlap each other.</p>  <p>The support plate and mounting plate overlap each other.</p>                                          |
| <p><b>[1f]</b> the swivel element is arranged such that the elongated 'mounting plate is able to swivel</p>                            | <p>As shown in the picture below the SS Rotating Mount rotates fully with 4 locking positions at 0, 30, 60 and 90 degrees for the mount to be held at the various degrees, as the product description advertises, the elongated mounting plate must swivel perpendicular to the original orientation of the elongated mounting plate, as covered by the '111 patent.</p> |

EXHIBIT K

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.



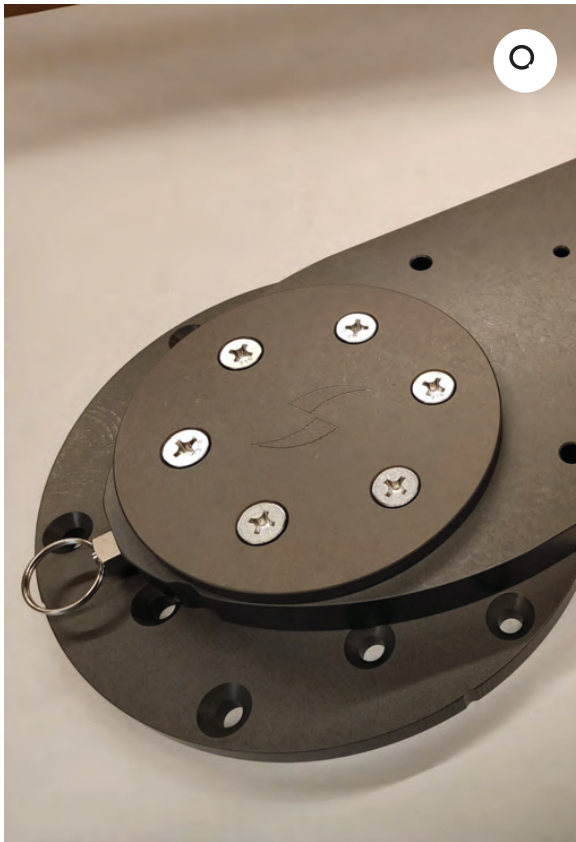
EXHIBIT K



(0) - \$0.00 

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## Our Products



## SS-9.5R Rotating Mount

★★★★★ (5 customer reviews)

**\$799.99**

Larger Diameter Rotating Trolling Motor Mount Bracket (Max Shaft 120")

1

Add to cart



SKU: SS-9.5R-1 Category: [Mounts](#) Tag: [Pivot](#)

<https://shuttleslide.com/product/ss-9-5r-rotating-mount/>

EXHIBIT L

1/8



## Description

Additional  
information

Reviews (5)

## Description



00:00

00:08

## Rotating Trolling Motor Mount

PLEASE ALLOW APPROXIMATELY **2 to 3 WEEKS** FOR YOUR ORDER TO SHIP.  
CANCELED ORDERS WILL INCUR CREDIT CARD FEES.

EXHIBIT L

<https://shuttleslide.com/product/ss-9-5r-rotating-mount/>

2/8

This Patent Pending mount is CNC Machined from **1.0" thick** 6061-T6 aluminium. Additionally, it is *Type III Hard Coat Anodized per MIL-A-8625* and comes with a **lifetime warranty\***. This model rotates fully with 4 locking positions at 0, 30, 60 and 90 degrees to allow you to pivot or swivel the motor into position. Fully compatible with your **Minn Kota, Garmin, Rhodan, Power-Pole, Motorguide** or any other trolling motor with **up to 120** inch shaft length. If you want to use your standard quick release mount such as RTA-17, MKA-21, RTA-54, RTA-62, MKA-64, RTA-55, MKA-56, or Garmin versions, we have those hole patterns included already so you are **all set!** Quest series motors require **QST-1** expander plate so please add that to your cart when ordering for those motors. With a built in, simple to use detent mechanism, simply pull the large pin and rotate the motor so the shaft clears the rub rail. **Easy!** The SS-9.5R is the most robust rotating mounting system available today.

## Why choose SS-9.5R over the SS-7.5R? (Short Video)

- You want to reduce the amount of pressure on your deck (clear deck space required for a 9.5" diameter circle)

## Why choose a rotating mount?

- You have limited space to attach a trolling motor
- You want the trolling motor to sit off to the side and sit along the gunwale
- You want a clear view of the bow without the trolling motor obstructing your field of view
- **ALL SS-9.5R mounts require 6 holes in your deck** for proper attachment with first bolt within approximately 13 inches from edge of rub rail
- Uses all 3/8" 316 Stainless hardware
- Optional Backing plate **BKP-9.5R** recommended if your have concerns about your deck

## Product overview

- Designed to be used with the following mount systems or trolling motors with shaft lengths up to 108 inches
  - **Minn Kota (Quest series included\*\*)** Instinct, Ulterra, Terrova, Powerdrive, Riptide Ulterra, Riptide Terrova, Riptide Powerdrive, Riptide SP/ST, PD/HC Pontoon and DH40
  - **Garmin Force Kraken**
  - **Rhodan (all models)**
  - **Power-Pole Move PV (Offshore model supported!)**
  - **MotorGuide:** Xi5 and Xi3
  - **Lowrance/Simrad Recon**



EXHIBIT L

- RTA-17, MKA-21, RTA-54, RTA-62, MKA-64, RTA-55\*\*, MKA-56\*\* Quick Release mounts
- JM55007 (RTA-17 / MKA-21 clone) Quick Release mounts
- Many other brands that share the same bolt patterns as above

## Dimensions

- Deck Plate footprint: 9.5" Diameter
- Center of rotation: *Approximately* 3.5 inches behind rear of motor
- Center of rotation to edge of trolling motor shaft: *Approximately* 17.25 to 18.25 inches
- Rotation Pin: 4.5" Diameter
- Detent Pin: 10mm Diameter (Over 6,000 lb shear rating)
- Travel: 360 degrees, 4 detents at 0, 30, 60 and 90
- Trolling motor mounted height: ~1.50 inches from mounting surface (Boat deck typically)
- Bottom of rotating plate to deck: *Approximately* 0.675 inches
- Rated motor weight (NOT thrust): 120 lbs
- Rated shaft length: UP TO 120 inches
- [Installation Instructions](#) (Preliminary!)
- **Warranty: Lifetime\***

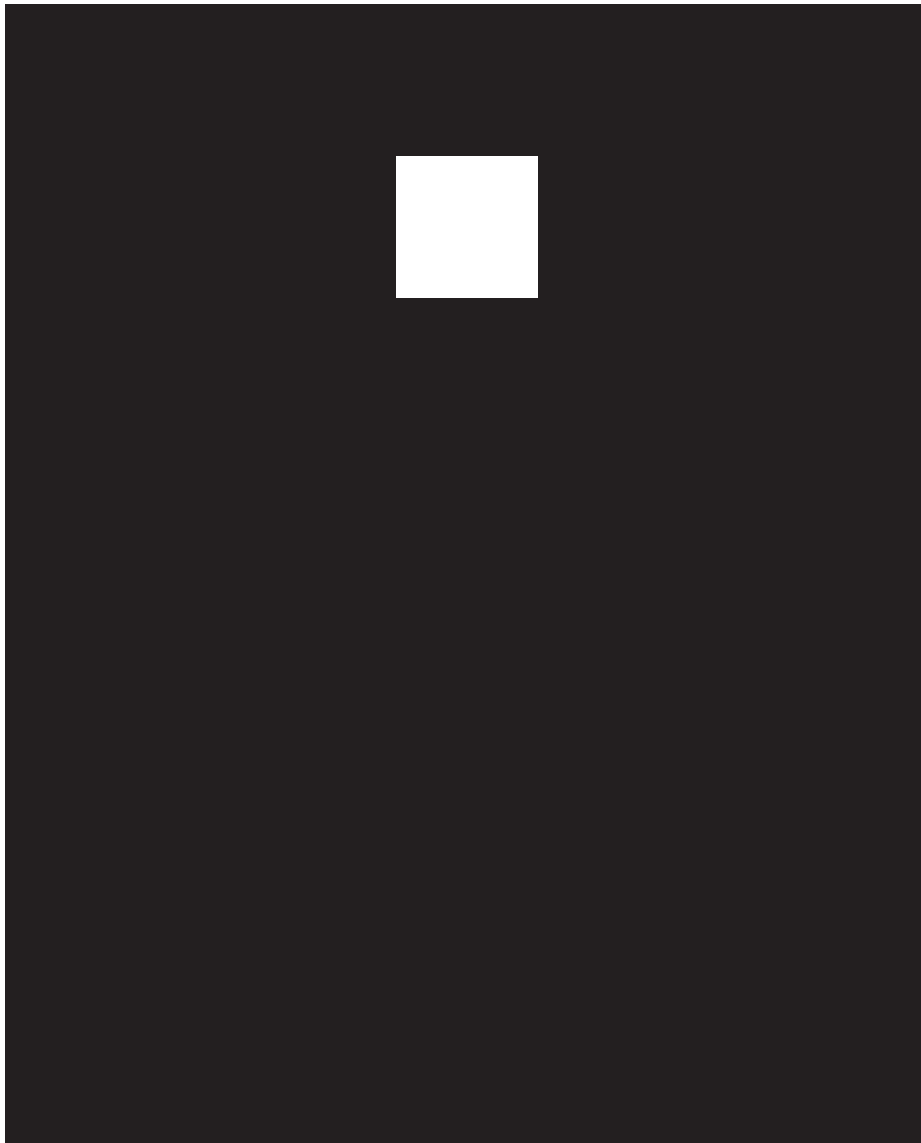
\*Please see [Warranty](#) page for complete details of coverage

\*\* Requires additional [QST-1](#) adapter

## Additional Videos



EXHIBIT L



<https://shuttleslide.com/product/ss-9-5r-rotating-mount/>

5/8



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00:10



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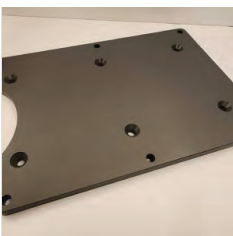
You may also like...

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EXHIBIT L

<https://shuttleslide.com/product/ss-9-5r-rotating-mount/>

6/8

|                                                                                                 |                                                                                                |                                                                                                           |
|-------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|
|                |               |                          |
| <p>BKP-9.5R</p> <p>Backing Plate For ShuttleSlide SS-9.5R</p> <p>\$59.99</p> <p>ADD TO CART</p> | <p>SPC-7.5R</p> <p>Spacer Plate For ShuttleSlide SS-7.5R</p> <p>\$95.00</p> <p>ADD TO CART</p> | <p>QST-1</p> <p>Quest / Instinct SS-7.5R &amp; 9.5R expansion plate</p> <p>\$74.99</p> <p>ADD TO CART</p> |

## Related products

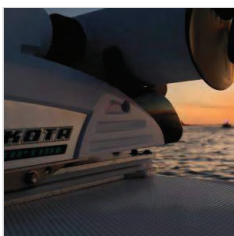
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|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                            |  |                                                         |                                                      |
| <p>SS-15-UHD</p> <p>Ultra HD 15 Inch Retractable, Quick Release, Trolling Motor Mount Bracket with Lifetime Warranty. (72" Max Shaft)</p> <p>\$516.99</p> <p>ADD TO CART</p> | <p>SQD-14</p> <p>SQD-14 Plate</p> <p>\$154.00</p> <p>ADD TO CART</p>               | <p>SS-12-EXD</p> <p>EXTREME Duty 12 Inch Retractable Mount (up to 108" Max Shaft) (Quest/Instinct)</p> <p>\$599.88</p> <p>ADD TO CART</p> | <p>SS-7-EXD</p> <p>EXTREME Duty 7 Inch Retractable Mount (up to 108" Max Shaft) (Quest/Instinct)</p> <p>\$349.99</p> <p>ADD TO CART</p> |



EXHIBIT L



📍 Florida

Copyright 2017-2025, support@shuttleslide.com

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POLICIES





Albert D. Sabater, Esq.  
EPGD Business Law  
777 SW 37th Avenue  
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Miami, FL 33135  
T: (786) 837-6787  
F: (305) 718-6787  
albert@epgdllaw.com

June 25, 2025

**SENT VIA EMAIL ONLY**

Mark F. Warzecha, Esq.  
Wilderman Malek, PL  
1990 W. New Haven Avenue  
Second Floor  
Melbourne, FL 32904  
Email: [MFW@USLegalTeam.com](mailto:MFW@USLegalTeam.com)

**Re: Sea Swivel's Intellectual Property Rights  
Cease and Desist to ShuttleSlide as to the "SS-7.5R Rotating Mount"  
and "SS-9.5R Rotating Mount"**

Dear Mr. Warzecha:

The undersigned and the law firm of EPGD represent SEA SWIVEL INC ("Sea Swivel") in connection with its intellectual property litigation matters. This letter follows up on Mr. Anthony Bruno's cease and desist letter, to which your office responded on April 18, 2025. Since then, neither Mr. Bruno nor Sea Swivel has received any further communication from your client regarding ShuttleSlide's infringement. Please consider this letter Sea Swivel's final formal demand to cease and desist.

As you know, Sea Swivel markets and sells the Sea Swivel motor mount and is the owner of U.S. Patent No. 12,258,111, entitled *Swivel mounts for attaching and maneuvering accessories over the gunnel of a boat or any other mounting surface* (the "Sea Swivel Patent" or the "Patent"). A copy of the Sea Swivel Patent is enclosed as **Exhibit "A"** and fully incorporated by reference herein.

Sea Swivel has invested significant time, resources, and capital into developing its products and intellectual property, earning a reputation for innovation and top-quality manufacturing. The Sea Swivel Patent exists to protect these advancements from unauthorized use—precisely the kind of misuse ShuttleSlide is attempting with its offering of the SS Rotating Trolling Motor Mount<sup>1</sup>.

The *Sea Swivel Patent* is comprised of a swivel mount disposed above an upward surface of the boat gunnel comprising of and among other things, the following:

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<sup>1</sup> See, ShuttleSlide's Offerings of the SS Rotating Mounts: <https://shuttleslide.com/product/ss-7-5r/>; <https://shuttleslide.com/product/ss-9-5r-rotating-mount/>.

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- a) a swivel mount, comprising: **an elongated mounting plate comprising first and second opposing faces** spaced apart by one or more peripheral sidewalls; **a support plate comprising first and second opposing faces** spaced apart by one or more peripheral sidewalls, wherein the **support plate has a length less than or equal to half a length of the elongated mounting plate**; and **a swivel element, wherein the swivel mount is configured for the elongated mounting plate, the support plate, and swivel element to be coupled together such that: the first faces of the support plate and the elongated mounting plate are parallel; the swivel element, the support plate, and the elongated mounting plate at least partially overlap each other**; and the swivel element is arranged such that **the elongated mounting plate is able to swivel 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; and
- b) wherein the swivel mount comprises a support member fastened to the upward facing **surface of the gunnel via one or more bolts or screws through the upward facing surface of the gunnel**; and a **trolling motor mounting bracket coupled to an upward facing surface of the mounting member**.

It has come to our attention that ShuttleSlide is infringing upon certain claims of *Sea Swivel Patent* in violation of Section 27 of the Patent Act. Specifically, without authority of Sea Swivel, ShuttleSlide is directly utilizing and infringing upon Sea Swivel's exclusive proprietary and patent rights through its offer and utilization of the SS-7.5R and SS-9.5R Rotating Mounts ("SS Rotating Mounts"). ShuttleSlide's utilization of the SS Rotating Mounts is a commercialization and direct infringement of *Sea Swivel's Patent*—particularly Sea Swivel's primary use as a trolling motor mount device capable of rotating while mounted to the upward gunnel of the boat.

Patent infringement is a serious matter, and Sea Swivel expects third parties such as ShuttleSlide to respect Sea Swivel's patent rights. As ShuttleSlide had been previously placed on notice via Sea Swivel's demand dated March 31, 2025, the extent and context of ShuttleSlide's activities clearly establish that the infringement of the *Sea Swivel Patent* is willful. As such, ShuttleSlide may be liable for enhanced damages and attorneys' fees incurred by Sea Swivel to enforce its rights. Attached hereto as **Exhibit "B"** is Sea Swivel's claim chart depicting specific and direct infringements between the *Sea Swivel Patent* and the SS Rotating Mounts.

Whoever infringes a patent is in violation of Federal Law, United States Code Title 35, Section 271, and subject to suit in Federal Court. 35 United States Code Section 281. The Court has the power to issue an injunction (35 U.S.C. 283) shutting down any sales of infringing product and award damages to the patent owner in an amount that is no less than a reasonable royalty (35 U.S.C. 284). In the case of willful infringement, the Court is authorized by statute to treble the actual damages amount and even require the infringer to pay the patent owner's attorney fees. Such fees can actually exceed the total infringement damages in the event of small total sales volume.

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Furthermore, ShuttleSlide shall also be aware of 15 U.S.C. 1125 (Section 43 of the Lanham Act) which prohibits deceptive and false representations and advertising. Shuttle Slide's advertising claims related to the SS Rotating Mounts expose it to the risk of heavy penalties including, but not limited to, monetary damages, punitive damages, treble damages, award of attorneys' fees, and injunctive relief, all distinct from the remedies available for patent infringement. This is even more true when ShuttleSlide has already been placed on notice when

**Accordingly, regarding the Patent, Sea Swivel therefore demands that ShuttleSlide immediately cease its infringing activities by discontinuing the utilization and commercialization without authorization of Sea Swivel's patent via the SS Rotating Mounts or any other variant and desists from such infringing activity now and in the future and comply with Sea Swivel's requirements as set out in its Patent and this letter. In addition, Sea Swivel demands that ShuttleSlide provide Sea Swivel with sufficient information to determine the extent of ShuttleSlide's infringement, including all proceeds derived therefrom, and suitable damages for the infringement. Furthermore, Sea Swivel demands that ShuttleSlide promptly provide Sea Swivel with written confirmation that ShuttleSlide will comply with these demands.**

ShuttleSlide is specifically advised that any failure or delay in complying with these demands may compound the damages for which ShuttleSlide may be liable. If Sea Swivel does not receive a satisfactory written response to these demands by the close of business **(5:00 p.m. EST) on Monday July 7, 2025**, Sea Swivel is prepared to take any and all necessary steps, at law and in equity, to protect its valuable intellectual property rights, without further notice to ShuttleSlide, including the filing of an action and seeking an emergency injunction against ShuttleSlide to prevent imminent harm and irreparably injury towards Sea Swivel.

Nothing in this letter shall be construed to constitute an express or implied waiver of any rights or remedies that Sea Swivel may have or hereafter obtain in connection with this matter, all of which are hereby expressly reserved. In addition to the aforementioned, allow for this letter to serve as notice that you are not to destroy, conceal or alter any electronic data or communications procured in relation to this matter, including, but not limited to, emails, correspondence, and any and all forms of communication. As you know, your failure to comply with this notice can result in severe sanctions being imposed by the Court for the spoliation of evidence or potential evidence.

We trust that you will comply with the requests set forth above, including your written confirmation as set forth herein.

Sincerely,

*/s/ Albert D. Sabater*

For the Firm

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

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