

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

MIAMI DIVISION

CASE NO. 25-CV-23581-RKA

SEA SWIVEL INC, a Florida Corporation,

Plaintiff,

v.

RHODAN MARINE SYSTEMS OF
FLORIDA, LLC, et. al.,

Defendants.

**PLAINTIFF'S RENEWED¹ MOTION FOR PRELIMINARY INJUNCTION AND
INCORPORATED MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF'S
RENEWED MOTION FOR PRELIMINARY INJUNCTION**

¹ Plaintiff submits this renewed motion collectively against the Defendants pursuant to this Court's Order dated October 15, 2025. [ECF No. 26].

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I. INTRODUCTION

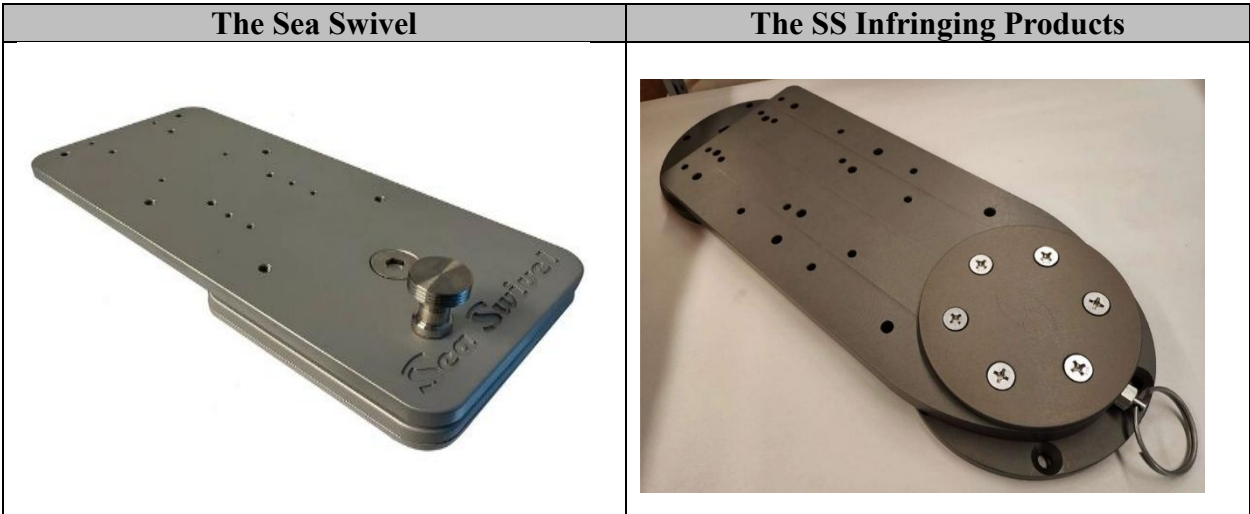
Sea Swivel, Inc (“Sea Swivel”) was born in the heart of the Upper Keys—the legendary “Fishing Capital of the World”—Sea Swivel launched in 2023 with a bold mission: to transform trolling motor technology. Its flagship innovation, the *Original Swivel Mount*, is the first heavy-duty, fully adjustable 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. Plaintiff’s innovation is the result of years of extensive and expensive research and development. When Sea Swivel launched this product, there was nothing like it on the market. All other comparable products on the market have *slid* into irrelevance—pun intended. In building its business around this product, Sea Swivel did everything right.



Sea Swivel’s remarkable success has attracted the attention of copycats who seek to exploit the goodwill that Sea Swivel built in this market niche. These copyists are selling cheap versions of the patented Sea Swivel and are doing so intentionally. The Defendants RHODAN MARINE SYSTEMS OF FLORIDA, LLC (“Rhodan”), SHUTTLESLIDE LLC (“Shuttleslide”), and DREAM MACHINE & PROTOTYPING, LLC d/b/a T/6 Marine (“T/6” and collectively, the “Defendants”) are some of those sellers.

a. SHUTTLESLIDE

Shuttleslide sells its infringing products the SS-7.5R/9.5 Rotating Mounts (collectively the “SS Infringing Products”), under the brand name “Shuttleslide” on its website, and through various distributors, including Keystone Automotive Operations, Inc. (“Keystone Automotive”) via its marine distribution company, SeaWide Marine Distribution Inc. (“SeaWide”), which is one of the largest distributors in the world. The infringing sales have harmed and continue to harm sales of the patented Sea Swivel, which is Sea Swivel’s primary revenue source.



Shuttleslide’s efforts to exploit the Sea Swivel invention, however, extend beyond accidental patent infringement and amount to blatant and willful infringement of the ‘111 Patent. Shuttleslide which had long sold its flagship product the “Shuttleslide,” which did just that, it only

“slid.” However, realizing the popularity of the Sea Swivel, Shuttleslide developed the SS Infringing Products dubbed the “Rotating Mount” to function *identically* to the patented Sea Swivel. Shuttleslide’s own website concedes that its users can “swivel the [trolling] motor into position”—a feature its original sliding mount could not perform.

As further evidence of Shuttleslide’s deliberate infringement, during the pendency of this litigation, Shuttleslide willfully and intentionally sought to interfere with Sea Swivel’s manufacturer by attempting to solicit proprietary information—outside the bounds of these proceedings—regarding the *very product* it stands accused of infringing.

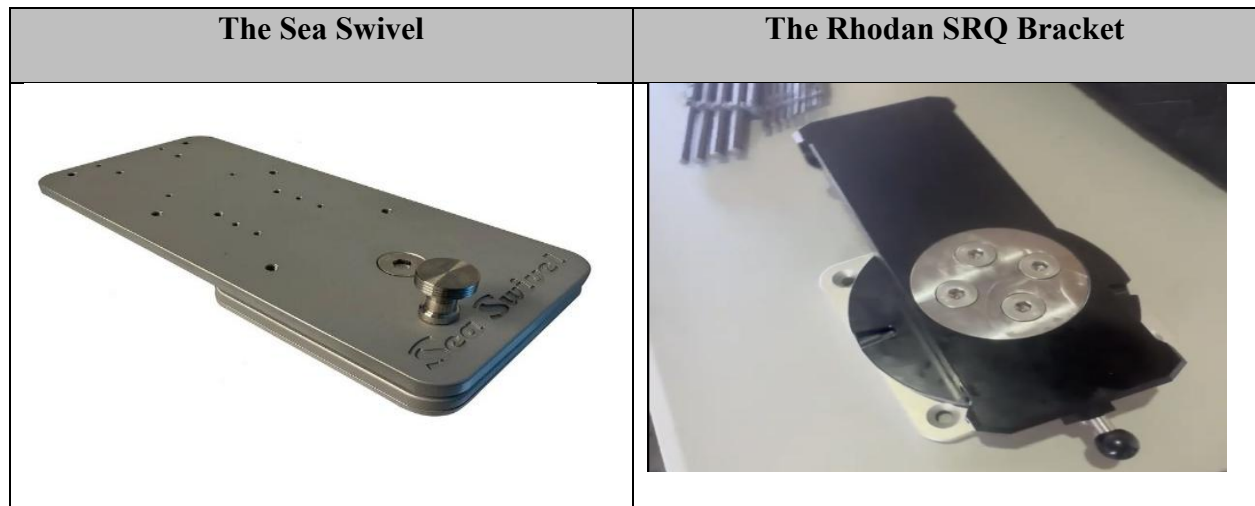
In short, Shuttleslide not only has appropriated the Sea Swivel patent, but it has copied the Sea Swivel’s appearance, including its swiveling feature, and advertising content. By designing and promoting its products in a way that functions identical to the patented Sea Swivel, Shuttleslide is exploiting Sea Swivel’s goodwill and is trading off the reputation that Sea Swivel has generated over nearly a three-year period for its innovative, highly rated, best-selling product—the Sea Swivel. The harm caused by Shuttleslide’s exploitation of Sea Swivel’s innovation and reputation is exacerbated by the fact that the SS Infringing Products are now being marketed and distributed via its mass distribution with Keystone Automotive. Accordingly, Sea Swivel requires a preliminary injunction, enjoining Shuttleslide’s exploitive infringement of the ‘111 Patent, to prevent Sea Swivel from suffering further irreparable harm.

b. RHODAN MARINE

Rhodan sells its infringing product the Rhodan SRQ Bracket (“SRQ Bracket”), under the brand name “Rhodan” on its website², and through various distributors, including Hodges Marine.

² When this action was filed, the SRQ mount was sold on the Rhodan website. As of this motion, the SRQ mount website link is broken: <https://www.rhodanmarine.com/product/srq-brackets-sliding-rotating-quick-release/>.

These infringing sales have harmed and continue to harm sales of the patented Sea Swivel, which is Sea Swivel’s primary revenue source. Rhodan’s efforts to exploit the Sea Swivel invention, however, extends beyond routine patent infringement. Rhodan is known in the industry for producing exclusively trolling motors, and related accessories. In line with other leading trolling motor manufacturers, Rhodan’s trolling motors were ultimately installed on boats utilizing the Sea Swivel mounting system.



However, realizing the popularity of the Sea Swivel, Rhodan designed its infringing product dubbed the “SRQ Bracket” to function *identically* to the patented Sea Swivel in order to cut out the middleman.

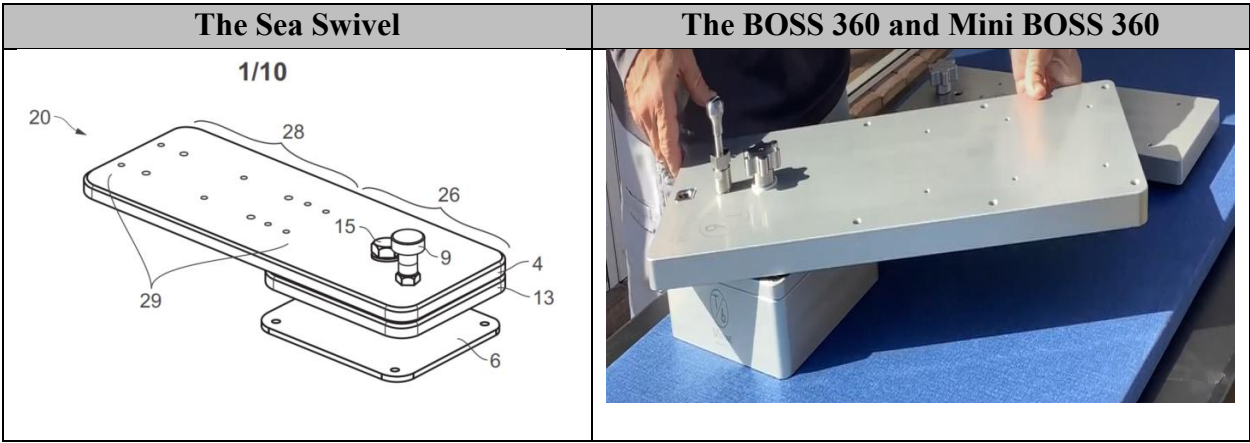
In short, Rhodan has not only blatantly appropriated the Sea Swivel patent, but it has copied the Sea Swivel’s appearance, including its swiveling feature. By designing and promoting its product in a way to function identically to the patented Sea Swivel, Rhodan is exploiting Sea Swivel’s goodwill and is trading off the reputation that Sea Swivel has generated over the three-year period for its innovative, highly rated, best-selling product—the Sea Swivel. Accordingly, Sea Swivel seeks a preliminary injunction to Rhodan’s exploitive infringement.

c. **T/6 MARINE**

T/6 Marine sells its infringing product the BOSS 360 and Mini BOSS 360 (collectively the “T/6 Infringing Products”), under the brand name “T/6 Marine” on its website, and various marine retailers including, Fish Tale Boats, in Lee County, Florida. The infringing sales have harmed and continue to harm sales of the patented Sea Swivel, which is Sea Swivel’s primary revenue source.

T/6 Marine also sells another type of trolling motor mount called the “ToonBOSS HD” and “ToonBOSS” which is a trolling motor mount that requires a user to physically remove the top mounting plate for the top mounting plate and base plate to sit parallel when stowed.

However, realizing the popularity of the Sea Swivel, T/6 Marine designed a second trolling motor mount—its infringing product named the “BOSS 360” and “Mini BOSS 360” to not only function *identically* to the patented Sea Swivel, but also appear nearly *identical* to the Sea Swivel.



In short, T/6 Marine not only has appropriated the Sea Swivel patent, but it has copied the Sea Swivel’s appearance, including its swiveling feature. By designing and promoting its product in a way to function identically to the patented Sea Swivel, T/6 Marine is exploiting Sea Swivel’s goodwill and is trading off the reputation that Sea Swivel has generated over the three-year period for its innovative, highly rated, best-selling product—the Sea Swivel. Accordingly, Sea Swivel seeks a preliminary injunction to T/6 Marine’s exploitive infringement.

II. FACT BACKGROUND

Based in Key Largo, Florida, Sea Swivel is unique in the marine industry, with its sole purpose of building a swiveling rotating mount allowing 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. Declaration of Mark Berta attached hereto as **Exhibit “A”** at ¶ 3. 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. Ex. A at ¶ 3. Moreover, the Sea Swivel can handle even the heaviest and largest trolling motors on the market. Ex. A at ¶ 3.

a. THE SEA SWIVEL TROLLING MOTOR MOUNT

The Sea Swivel is the market-leading trolling motor mount in the United States. Ex. A at ¶¶ 4-5. 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. Ex. A at ¶ 4.

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. Ex. A at ¶ 6. 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*. Ex. A at ¶ 6.

Sea Swivel invested heavily in establishing its patent, including over \$500,000.00 in just three years between marketing, advertising, and development to build its brand and develop this new market product, the first swiveling trolling motor mount. Ex. A at ¶¶ 8-9. Through innovation, quality, and ongoing adherence to customer service, the Sea Swivel has developed significant

brand recognition and goodwill, generating a meaningful reputation for quality and value Ex. A at ¶ 9.

Sea Swivel has created an intellectual property portfolio that includes U.S. Patent No. 12,258,111 (the ‘111 Patent”). Ex. A at ¶ 11. A true and correct copy of the ‘111 Patent is attached hereto as **Exhibit “B.”** The patented Sea Swivel is the flagship product that Sea Swivel sells; it accounts for nearly all of Sea Swivel’s revenues. Ex. A at ¶ 10. Those revenues are entirely derived from eCommerce, and approximately 80% come from commercial distribution. Ex. A at ¶ 10.

b. THE INFRINGING PRODUCTS

1. SHUTTLESLIDE’S INFRINGING PRODUCTS

Shuttleslide sells its SS Infringing Products on its eCommerce website, and largely distributed, that it identifies as a “Rotating Trolling Motor Mount – This Patent Pending mount is CNC Machined from 1.0” thick 6061-T6 aluminium . . . 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.”

As demonstrated in the picture below, the SS Infringing Products are similar in both appearance and functionality. The SS Infringing Products capitalize on the key patented features of the Sea Swivel, which are not only protected by the ‘111 patent, but are also the key features that distinguish Sea Swivel on the market and create consumer recognition with Sea Swivel’s reputation for quality and value. Ex A at ¶ 37.



The SS Infringing Products' appearance, function and method of use are indistinguishable to the consumer. Ultimately, the SS Infringing Products function in the exact same way, to get the exact same results as the Sea Swivel. Ex A at ¶¶ 17–19.

2. RHODAN'S INFRINGING PRODUCTS

Rhodan sells the SRQ Bracket on its eCommerce website, and through its distributors that it identifies as a "patent pending SRQ Mount continues that tradition of innovation by being the first device to provide slide, rotation, and quick-release functionality in a single mount."

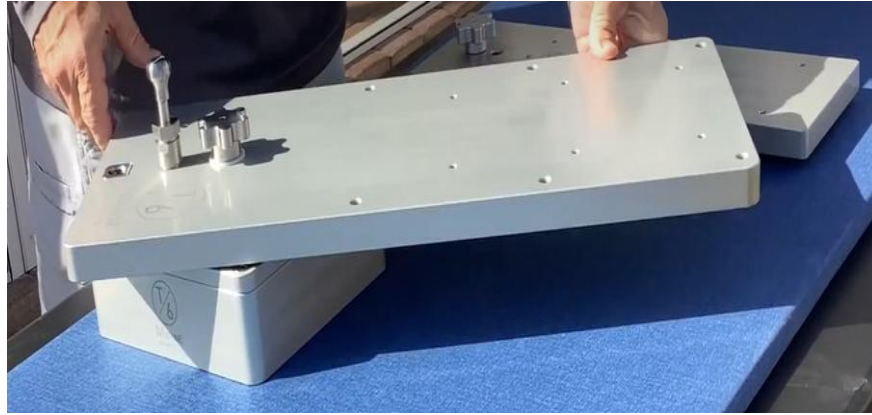
As demonstrated in the picture below, the SRQ Bracket is similar in both appearance and functionality. Rhodan's SRQ Bracket capitalizes on the key patented features of the Sea Swivel, which are not only protected by the '111 patent, but are also the key features that distinguish Sea Swivel on the market and create consumer recognition with Sea Swivel's reputation for quality and value. Ex A at ¶ 6.



The Infringing Product's appearance, function and method of use are indistinguishable to the consumer. Ultimately, the SRQ Bracket functions in the exact same way, to get the exact same results as the Sea Swivel. Ex A at ¶¶ 24–26.

3. T/6 MARINE'S INFRINGING PRODUCTS

T/6 Marine sells the T/6 Infringing Products on its eCommerce website, and through its distributors that it identifies as the BOSS360 and Mini BOSS360.



As illustrated in the image above, the T/6 Infringing Products are identical in both appearance and functionality. The T/6 Infringing Products capitalize on the key patented features of the Sea Swivel, which are not only protected by the '111 patent, but are also the key features that distinguish Sea Swivel on the market and create consumer recognition with Sea Swivel's reputation for quality and value. Ex. A at ¶ 6. Ultimately, the T/6 Infringing Products function in the exact same way, to get the exact same results as the Sea Swivel.

III. SCOPE OF REQUESTED PRELIMINARY INJUNCTION

In this motion, Seas Swivel seeks to enforce the '111 Patent to prevent Defendants, RHODAN MARINE SYSTEMS OF FLORIDA, LLC, SHUTTLESLIDE LLC, and DREAM MACHINE & PROTOTYPING, LLC d/b/a T/6 Marine, from making, using, selling, offering for sale, importing, or causing others to make, use, sell, offer for sale, or import, each of their respective Infringing Products, including but not limited to, through their eCommerce website, through any distributors, and offering to sell anywhere in the United States. For purposes of this Motion, Sea Swivel asserts one representative claim (Claim 1) of the '111 Patent.

IV. LEGAL STANDARD

The Supreme Court has held that in patent disputes, “the decision whether to grant or deny injunctive relief rests within the equitable discretion of the district courts, and that such discretion must be exercised consistent with traditional principles of equity.” *eBay Inc. v. MercExchange, L.L.C.*, 547 U.S. 388, 394 (2006). The Patent Act further provides that courts may grant injunctive relief on such terms as it may deem reasonable to prevent or restrain infringement. *Id.* at 392 (quoting 35 U.S.C. § 283). In addition, the Act states that “patents shall have the attributes of personal property,” including “the right to exclude others from making, using, offering for sale, or selling the invention.” *Id.* (quoting 35 U.S.C. § 261).

To obtain a preliminary injunction, a party must demonstrate “(1) a substantial likelihood of success on the merits; (2) that irreparable injury will be suffered if the relief is not granted; (3) that the threatened injury outweighs the harm the relief would inflict on the non-movant; and (4) that the entry of the relief would serve the public interest.” *Schiavo ex. rel Schindler v. Schiavo*, 403 F.3d 1223, 1225-26 (11th Cir. 2005). Plaintiff need only show a likelihood of success, not certain success, which is satisfied if Plaintiff demonstrates a “substantial case on the merits.” *Id.* None of the four requirements “has a fixed quantitative value. Rather, a sliding scale is utilized, which takes into account the intensity of each in a given calculus.” *Family First Life, LLC v. Rutstein*, No. 22-80243-CIV, 2022 WL 1643213, at *2 (S.D. Fla. Apr. 5, 2022) (citations omitted).

In considering the motion, the Court “may rely on affidavits and hearsay materials which would not be admissible evidence for a permanent injunction if the evidence is ‘appropriate given the character and objectives of the injunctive proceeding.’” *Family First Life, LLC*, 2022 WL 1643213, at *3 (citations omitted).

a. SEA SWIVEL IS LIKELY TO SUCCEED ON THE MERITS.

“[A] preliminary injunction enjoining patent infringement pursuant to 35 U.S.C. § 283 involves substantive matters unique to patent law and, therefore, is governed by the law of [the Federal Circuit].” *Revision Military, Inc. v. Balboa Mfg. Co.*, 700 F.3d 524, 525 (Fed. Cir. 2012) (internal quotation and citation omitted). The Federal Circuit explained the preliminary injunction standard as follows:

A plaintiff seeking a preliminary injunction must establish that [it] is likely to succeed on the merits, that [it] is likely to suffer irreparable harm in the absence of preliminary relief, that the balance of equities tips in [its] favor, and that an injunction is in the public interest.

Id. (quoting *Winter v. Natural Res. Def. Council, Inc.*, 555 U.S. 7, 20 (2008)); *Luminara Worldwide, LLC v. Liown Elecs. Co.*, 814 F.3d 1343, 1352 (Fed. Cir. 2016). “Therefore, the plaintiff must show ‘whether success is more likely than not’ under the Federal Circuit’s standard.” *InVue Sec. Prod. Inc. v. Vanguard Prod. Grp., Inc.*, No. 8:18-CV-2548-T-33SPF, 2019 WL 4671143, at *2 (M.D. Fla. July 1, 2019), *report and recommendation adopted*, No. 8:18-CV-2548-T-33SPF, 2019 WL 4673755 (M.D. Fla. Aug. 15, 2019).

To prove infringement, “a patentee must either point to specific instances of direct infringement or show that the accused device necessarily infringes the patent in suit.” *Jardin v. Datallegro, Inc.*, 2011 WL 1311732, *2 (S.D. Cal. Apr. 1, 2011) (quoting *ACCO Brands, Inc. v. ABA Locks Mfr. Co.*, 501 F.3d 1307, 1313 (Fed. Cir. 2007)).

A patent owner may prove infringement under either a literal infringement theory or under the doctrine of equivalents. *See Ethicon Endo-Surgery, Inc. v. U.S. Surgical Corp.*, 149 F.3d 1309, 1318 (Fed. Cir. 1998) (describing the doctrine of equivalents as “a viable alternative to literal infringement”). For a product to infringe a given patent claim, therefore, each “limitation” of that

claim must be found in the product either literally or through an equivalent. Each limitation of claim 1 is found literally in each of the respective Infringing Products.

Infringement is not avoided if the accused device has extra parts, ingredients, or steps, respectively, to those claimed. *Dow Chem. Co. v. Sumitomo Chem. Co.*, 257 F.3d 1364, 1380-81 (Fed. Cir. 2001); *Vivid Tech., Inc. v. Am. Sci. & Eng'g, Inc.*, 200 F.3d 795, 811 (Fed. Cir. 1999). An accused device may be found to infringe if it is reasonably capable of satisfying the claim limitations, even though it may also be capable of non-infringing modes of operation. *Hilgraeve Corp. v. Symantec Corp.*, 265 F.3d 1336, 1343 (Fed. Cir. 2001).

1. THE '111 PATENT

The '111 Patent is entitled "Swivel Mounts for Attaching and Maneuvering Accessories over the Gunnel of a Boat or Any Other Mounting Surface." '111 Patent col. 1 l. 1–4. As the patent states the invention 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." '111 Patent col. 1 l. 13–17.

The '111 Patent's Detailed Descriptions of Preferred Embodiments, together with the Figures, demonstrates the various embodiments. In particular, Figure 10, shown below, illustrates "an example of using swivel mount to support and maneuver a trolling motor over a boat gunnel." '111 Patent col. 13 l. 9–10.

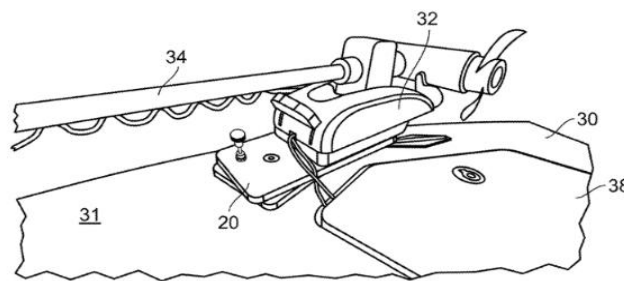


FIG. 10

2. THE CLAIMED INVENTION

For this Motion, Sea Swivel asserts Claim 1 of the '111 Patent, which claims:

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;

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.

3. SHUTTLESLIDE'S INFRINGING PRODUCTS

Each and every element of Claim 1 of the '111 Patent is present in the SS Infringing Products. *See* Representative Claim Chart for Shuttleslide attached hereto as **Exhibit "C."** Claim 1 of the '111 Patent defines a swivel mount structure through several distinct elements, all of which are met by the Infringing Products. First, the claim requires "an elongated mounting plate comprising first and second opposing faces spaced apart by one or more peripheral sidewalls" ("Element 1") The SS Infringing Products feature a long rectangular plate that meets this element, possessing opposing faces (top and bottom) separated by sidewalls.

Second, the patent claims "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” (“Element 2”). The SS Infringing Products incorporate a circular 'base plate' which functions as the supported plate. This plate is circular, has top and bottom faces separated by one sidewall, and its length is significantly less than the length of the elongated mounting plate, thus satisfying the size limitation of the claim.

Third, “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” (“Element 3”); “the swivel element, the support plate, and the elongated mounting plate at least partially overlap each other” (“Element 4”); 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” (“Element 5”). The SS Infringing Products satisfies each of these elements because its design enables the support plate and mounting plate to be held parallel while partially overlapping. Crucially, the mount "rotates fully" with multiple locking positions (*e.g.*, at 0, 30, 60, and 90 degrees), demonstrating the swivel element's arrangement allows the elongated plate to swivel perpendicular to its original orientation at a point intentionally spaced from the plate's widthwise center line.

4. RHODAN’S INFRINGING PRODUCTS

Each and every element of Claim 1 of the ‘111 Patent is present in Rhodan SRQ Bracket. *See* Representative Claim Chart for Rhodan attached hereto as **Exhibit “D.”** Claim 1 of the '111 Patent defines a swivel mount structure through several distinct elements, all of which are met by the SRQ Bracket. First, the claim requires “an elongated mounting plate comprising first and second opposing faces spaced apart by one or more peripheral sidewalls” (“Element 1”). The SRQ

Bracket features a long rectangular plate that meets this element, possessing opposing faces (top and bottom) separated by sidewalls.

Second, the patent claims “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” (“Element 2”). The SRQ Bracket incorporates a circular 'base plate' which functions as the supported plate. This plate is circular, has top and bottom faces separated by one sidewall, and its length is significantly less than the length of the elongated mounting plate, thus satisfying the size limitation of the claim.

Third, “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” (“Element 3”); “the swivel element, the support plate, and the elongated mounting plate at least partially overlap each other” (“Element 4”); 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” (“Element 5”). The SRQ Bracket satisfies these final elements because its design enables the support plate and mounting plate to be held parallel while partially overlapping. Crucially, the mount "rotates fully" with multiple locking positions (*e.g.*, at 0, 30, 60, and 90 degrees), demonstrating the swivel element's arrangement allows the elongated plate to swivel perpendicular to its original orientation at a point intentionally spaced from the plate's widthwise center line.

5. T/6 MARINE’S INFRINGING PRODUCTS

Each and every element of Claim 1 of the ‘111 Patent is present in T/6 Marine’s Infringing Products. *See* Representative Claim Chart for T/6 attached hereto as **Exhibit “E.”** Claim 1 of the

'111 Patent defines a swivel mount structure through several distinct elements, all of which are met by the T/6 Infringing Products. First, the claim requires “an elongated mounting plate comprising first and second opposing faces spaced apart by one or more peripheral sidewalls” (“Element 1”). The T/6 Infringing Products feature a long rectangular plate that meets this element, possessing opposing faces (top and bottom) separated by sidewalls.

Second, the patent claims “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” (“Element 2”). The T/6 Infringing Products incorporate a circular 'base plate' which functions as the support plate. This plate is circular, has top and bottom faces separated by one sidewall, and its length is significantly less than the length of the elongated mounting plate, thus satisfying the size limitation of the claim.

Third, “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” (“Element 3”); “the swivel element, the support plate, and the elongated mounting plate at least partially overlap each other” (“Element 4”); 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” (“Element 5”). The T/6 Infringing Products satisfy these final elements because its design enables the support plate and mounting plate to be held parallel while partially overlapping. Crucially, the mount "rotates fully" with multiple locking positions (*e.g.*, at 0, 30, 60, and 90 degrees), demonstrating the swivel element's arrangement allows the elongated plate to swivel perpendicular to its original orientation at a point intentionally spaced from the plate's widthwise center line.

6. CLAIM LANGUAGE IS SUFFICIENTLY CLEAR TO ENTER A PRELIMINARY INJUNCTION

Where, as here, the claim language is straightforward, the Court need not engage in claim construction prior to issuing a preliminary injunction. *Advantus, Corp. v. T2 International, LLC*, 2013 WL 12122313 at *5 (M.D. Fla. May 30, 2013). (“Before the preliminary injunction hearing, the Court determined that a Markman hearing was unnecessary, because the claim language was straightforward and the parties did not appear to dispute the meaning of the terms in any significant way.”).

In light of the Defendants’ clear and blatant infringement of the ‘111 Patent Sea Swivel is entitled to injunctive relief. Importantly, Sea Swivel has as demonstrated that each Defendant, has individually, produced, manufactured, and sold infringing products that contain each and every element of the ‘111 Patent. Therefore, Sea Swivel has a likelihood of success on the merits against the Defendants’ respective Infringing Products for infringement of Claim 1 of the ‘111 Patent.

b. DEFENDANTS’ WILLFUL INFRINGEMENT IS CAUSING IRREPARABLE HARM

“[T]he irreparable harm inquiry seeks to measure harms that no damages payment, however great, could address.” *Celsis In Vitro, Inc. v. CellzDirect, Inc.*, 664 F.3d 922, 930 (Fed. Cir. 2012).

1. SHUTTLESLIDE’S WILLFUL INFRINGEMENT IS CAUSING IRREPARABLE HARM

The need for immediate injunctive relief arises from ShuttleSlide’s willful and ongoing infringement of Sea Swivel’s Patent, U.S. Patent No. 12,258,111, which covers a novel, nonobvious swivel mount for attaching and maneuvering trolling motors over the gunnel of a boat. The SS Infringing Products are each swiveling trolling motor mounts that brazenly infringe upon Sea Swivel's valuable rights in the ‘111 patent.

Sea Swivel has previously notified Shuttleslide of its willful infringement on two occasions: March 31, 2025, and June 25, 2025. Notwithstanding clear notice of its infringement of the patented Sea Swivel, Shuttleslide has persisted in the manufacture and sale of the SS Infringing Products, including through engagement with one of the nation's largest marine distributors, Keystone Automotive.

2. SHUTTLESLIDE'S PRESENT CONDUCT IS CAUSING IRREPARABLE HARM

During the pendency of this litigation, Shuttleslide, through its owner Russell Taylor, deliberately and willfully approached Sea Swivel's manufacturer and production company, Billet Industries and sought protected discovery outside the confines of this action.

On October 7, 2025, Shuttleslide's owner, Russell Taylor ("Mr. Taylor") wearing a Shuttleslide Polo, confronted Horacio Longoria, and his employee Zach Putzig from Billet Industries, Inc. ("Billet") twice at the IBEX Show³ held at Tampa Bay Convention Center where Billet displayed a Sea Swivel in its booth. Declaration of Horacio Longoria's Declaration attached hereto as **Exhibit "F"** at ¶¶ 9; 10-12. Billet is Sea Swivel's exclusive manufacturer and developer. Ex. F at ¶ 5. Upon information, and belief, Mr. Taylor is aware of Sea Swivel's and Billet's relationship and is equally aware that Billet has in its control proprietary information as to the Sea Swivel. Ex. F at ¶ 13.

While in the midst of this action, Mr. Taylor on two separate occasions willfully and intentionally sought proprietary and trade-secret information as to the development, manufacturing techniques as to Sea Swivel. Ex. F at ¶¶ 10-12. Mr. Taylor's probing questions included, but were not limited to, the method of machining for the Sea Swivel, types of raw materials and anodizing

³ See IBEX: About Us, <https://www.ibexshow.com/about-us/> ("IBEX, The International BoatBuilders' Exhibition & Conference is North America's largest technical trade event for marine industry professionals.") (last visited Oct. 14, 2025).

techniques in fabricating the Sea Swivel, and the location of the production of the Sea Swivel's locking pin. Ex. F at ¶ 12. While many details of the Sea Swivel are disclosed through the '111 patent and on its own website, certain proprietary information and, importantly, trade secrets are not publicly available. Ex. F at ¶¶ 13, 15. Shuttleslide *vis-à-vis* Mr. Taylor's brazen behavior, collectively shows the intentional and willful conduct even while this litigation is ongoing.

The imminent harm, and irreparable damage is even more significant because Plaintiff recently learned that Shuttleslide entered into a distribution agreement with Keystone Automotive ("Mass Keystone Distribution Agreement"), making it a contributory infringer of the '111 patent. Critically, Keystone is one of the largest distributors of marine products, and its networks ensure that its products reach mass markets through a vast network of retailers, advertisements, and promotions.

As a direct result of the distribution agreement, the SS Infringing Products are now subject to mass market dissemination, raising the inevitability that Plaintiff faces grave and immediate harm to its business, business model, and overall viability, which relies heavily on the exclusivity provided by its Patent. Plaintiff has placed Keystone on notice of their contribution to Shuttleslide's infringement of the '111 patent by issuing a cease and desist on October 6, 2025.

3. LOST SALES AND LOST MARKET SHARE

i. SHUTTLESLIDE

The SS Infringing Products sales and offerings are harming Sea Swivel in various ways. First, the SS Infringing Products compete head-to-head with the patented Sea Swivel. Ex. A at ¶¶ 14–16. Although Shuttleslide was launched relatively recently, it has positioned its product on its eCommerce website, together entered into the Mass Keystone Distribution Agreement, as a lower-priced substitute for the Sea Swivel. Accordingly, Sea Swivel has lost revenue and market share to

the SS Infringing Products, and it will continue to do so if the infringement is not stopped. Ex. A at ¶¶ 33–35. This harm alone can be irreparable. *See Douglas Dynamics, LLC v. Buyers Prods. Co.*, 717 F.3d 1336, 1345 (Fed. Cir. 2013) (“Where two companies are in competition against one another, the patentee suffers the harm—often irreparable—of being forced to compete against products that incorporate and infringe its own patented inventions.”)

ii. RHODAN MARINE

The SRQ Bracket sales and offerings are harming Sea Swivel in numerous ways. First, the SRQ Bracket competes head-to-head with the patented Sea Swivel. Ex. A at ¶¶ 21–23 Although the SRQ Bracket was recently launched, it has positioned its products on its eCommerce website, together with Rhodan’s significant customer reach, as a lower-priced substitute for the Sea Swivel. Accordingly, Sea Swivel has lost revenue and market share to the SRQ Bracket, and it will continue to do so if the infringement is not stopped. Ex. A at ¶¶ 41–43. This harm alone can be irreparable. *See Douglas Dynamics*, 717 F.3d at 1345.

iii. T/6 MARINE

The T/6 Infringing Products’ sales and offers are harming Sea Swivel in various ways. First, the T/6 Infringing Products compete head-to-head with the patented Sea Swivel. Ex. A at ¶¶ 28–30. Although the T/6 Infringing Products were recently launched, it has positioned its product on its eCommerce website, together with a significant customer reach and at a comparable price point to the Sea Swivel. Accordingly, Sea Swivel has lost revenue and market share to the T/6 Infringing Products, and it will continue to do so if the infringement is not stopped. Ex. A at ¶ 45–46. This harm alone can be irreparable. *See Douglas Dynamics*, 717 F.3d at 1345.

4. HARM TO REPUTATION AND GOODWILL

Concerning Defendants' patent infringement, "[p]rice erosion, loss of goodwill, damage to reputation, and loss of business opportunities are all valid grounds for finding irreparable harm." *Celsis In Vitro, Inc.*, 664 F.3d at 930; *see also Aria Diagnostics, Inc. v. Sequenom, Inc.*, 726 F.3d 1296, 1304 (Fed. Cir. 2013) (recognizing damage to reputation as valid grounds for finding irreparable harm).

In addition, "[d]irect competition in the same market is certainly one factor suggesting strongly the potential for irreparable harm without enforcement of the right to exclude." *See Presidio Components, Inc. v. Am. Tech. Ceramics Corp.*, 702 F.3d 1351, 1363 (Fed. Cir. 2012). Those precise circumstances are present here. The Defendants, are individually, and unlawfully competing against Plaintiff using Plaintiff's patented invention and charging reduced pricing to undercut Plaintiff. Ex. A at ¶¶ 33–35, 41–43, 45–47.

i. SHUTTLESLIDE

First, while the patented Sea Swivel trolling motor mount enjoys customer ratings and significantly more exposure based on commercial and highly rated fishing personalities endorsing the Sea Swivel, the SS Infringing Products are able to divert sales because Shuttleslide has not only appropriated the patented Sea Swivel features (Ex. A at ¶¶ 7, 17–19, 33), but has also claimed on its own website to provide the identical features including the ability to "swivel." Ex. A at ¶ 18.

In short, Shuttleslide has set itself up as a cheaper replica of the Sea Swivel that has caused at least one of its own customers to call Sea Swivel for support believing they purchased a Sea Swivel. Ex. A at ¶ 37.

In *Douglas Dynamics*, the Federal Circuit explained this point using the district court's analogy, which compared the patent owner's superior product to a Mercedes Benz S550 and the

infringing product to a Ford Taurus. The court noted that buyers interested in purchasing a Mercedes, when presented with both choices, ordinarily may be unlikely to switch to the Ford or vice versa.

However, if the Ford made its place in the market by infringing on the intellectual property of the Mercedes and capitalized on its similarity to the better product, then the harm to the Mercedes product might go beyond a simple counting of lost sales—some of which would occur anyway if the Ford marketed itself effectively as a “Mercedes at half the price.” The Mercedes would lose some of its distinctiveness and market lure because competitors could contend that they had “similar features” without noting that those features infringe Mercedes's proprietary technologies.

Id.

The association created between the lesser, “knock-off” product diminishes the patented product’s reputation while exploiting the goodwill the patented product created.

The court’s analogy applies here. The original Shuttleslide was initially introduced as a sliding mount—that is, a mount designed to move linearly across the gunnel of a boat. However, following the introduction of the Sea Swivel, Shuttleslide, evidently dissatisfied with limiting itself to a sliding function, expanded beyond its original namesake design and developed a rotating mount. This rotating feature had previously distinguished the Sea Swivel from the Shuttleslide. Consequently, Sea Swivel lost its distinctiveness and competitive advantage, as the infringing product began to offer similar features. *Id.*

Importantly, courts have held that evidence of *head-to-head* competition and lost market share supports the finding of irreparable harm. In addition, “[d]irect competition in the same market is certainly one factor suggesting strongly the potential for irreparable harm without enforcement of the right to exclude.” *Socket Sols., LLC v. Imp. Glob., LLC*, No. 1:23-CV-24517-DSL, 2024 WL 4467001, at *11 (S.D. Fla. Sept. 9, 2024), *report and recommendation adopted*, No. 1:23-CV-24517, 2024 WL 4343485 (S.D. Fla. Sept. 29, 2024). Moreover, when looking at

head-to-head competitors, a causal nexus is established when the infringing features of defendant's product drive the consumer demand for the infringing product. *Edge Sys. LLC v. Aguila*, 186 F. Supp. 3d 1330, 1361 (S.D. Fla. 2016), *aff'd*, 708 F. App'x. 998 (Fed. Cir. 2017) ("Consumer demand for Aguila's product is driven by the same patented features that drive consumer demand for Edge's products"). Additionally, courts consider relevant industry dynamics when evaluating the loss of market share, such as entry of the infringing product on the market compared to the patented product, infringer's influence on price, and amount of revenue generated from infringing product. *Bio-Rad Labs., Inc. v. 10X Genomics Inc.*, 967 F.3d 1353, 1378 (Fed. Cir. 2020).

The damage is compounded by Shuttleslide's influence on price as they flood the market with infringing swivel mounts, namely the SS Infringing Products. Price erosion is a direct, immediate, and irreparable harm being caused by Shuttleslide's mass distribution, as Shuttleslide has significantly lowered the effective price of their mass distributed SS Infringing Products, thereby eroding the price and perceived value of the Sea Swivel product across the entire market. Ex. A at ¶¶ 14, 35–36. This immediate price erosion, coupled with the erosion of consumer recognition and market share, is particularly damaging because it is occurring at the critical time when Sea Swivel should be cementing itself as the industry leader with its patented innovation. Shuttleslide's infringing conduct is therefore actively eroding Plaintiff's ability to establish itself and solidify its pioneering status in the marketplace.

Finally, the harm to Sea Swivel is multiplied by the fact that Shuttleslide, while on notice of infringing upon the Sea Swivel patent, entered into the Mass Keystone Distribution Agreement. The Mass Keystone Distribution Agreement has caused several sales representatives to market and attempt to have existing Sea Swivel costumers, dealers and distributors purchase the SS Infringing Products. Ex. A at ¶¶ 15–16.

ii. RHODAN MARINE

The SRQ Bracket has diverted sales because Rhodan has not only appropriated the patented Sea Swivel features (Ex. A at ¶¶ 24–26), but has also claimed on its own website to provide the identical features including the ability to “rotate.” Ex. A at ¶ 25. In short, Rhodan has independently, developed a cheaper look-alike at less than half the price of a Sea Swivel. Ex. A at ¶¶ 42–43. The price of the SRQ Mount is \$499.99 versus Sea Swivel at \$1,099.99. Ex. A at ¶ 21.

The damage is compounded by Rhodan's influence on price as they flood the market with the SRQ Bracket. Price erosion is a direct, immediate, and irreparable harm being caused by Rhodan's mass distribution, as Rhodan has significantly lowered the effective price of their mass distributed product, thereby eroding the price and perceived value of the Sea Swivel product across the entire market. Ex. A at ¶¶ 42–43. This immediate price erosion, coupled with the erosion of consumer recognition and market share, is particularly damaging because it is occurring at the critical time when Sea Swivel should be cementing itself as the industry leader with its patented innovation. Rhodan's infringing conduct is therefore actively eroding Plaintiff's ability to establish itself and solidify its pioneering status in the marketplace.

iii. T/6 MARINE

As with Shuttleslide and Rhodan, T/6 Infringing Products have diverted sales because T/6 Marine has not only appropriated the patented Sea Swivel appearances (Ex. A at ¶¶ 28, 30), but has also claimed on its own website to provide the identical features including the ability to “rotating[.]” Ex. A at ¶ 31. In short, T/6 Marine has set itself a developed and produced an almost identical reproduction of a Sea Swivel. Ex. A at ¶ 30.

The damage is compounded by T/6 Marine's significant attempts at marketing the T/6 Infringing Products in Sea Swivel's own home turf. Ex. A at ¶ 29. This erosion of consumer

recognition and market share, is particularly damaging because it is occurring at the critical time when Sea Swivel should be cementing itself as the industry leader with its patented innovation. T/6 Marine's infringing conduct is therefore actively eroding Plaintiff's ability to establish itself and solidify its pioneering status in the marketplace.

The Defendants' individual acts of infringement upon the patented Sea Swivel have resulted in demonstrable harm to Sea Swivel's sales and have further undermined its reputation and brand equity. As the Federal Circuit has noted, an infringing competitor who sells an inferior product that incorporates patented technology is likely to cause irreparable harm by not only by diverting sales but also by eroding the patent owner's "reputation and brand distinction." *Douglas Dynamics*, 717 F.3d at 134.

5. LOST BENEFIT OF THE '111 PATENT

Naturally, the infringing sales also will deprive Sea Swivel of the principal benefit of its patent. As the Federal Circuit has held, "[b]ecause the principal value of a patent is its statutory right to exclude, the nature of the patent grant weighs against holding that monetary damages will always suffice to make the patentee whole." *Reebok Int'l Ltd. v. J. Baker, Inc.*, 32 F.3d 1552, 1557 (Fed. Cir. 1994); *see also Robert Bosch, LLC v. Pylon Mfg. Corp.*, 659 F.3d 1147, 1149 (Fed. Cir. 2011) ("While a patentee's right to exclude alone cannot justify an injunction, it should not be ignored either.").

It is entirely appropriate to consider the nature of the patent grant in the irreparable harm analysis because patents are time-limited rights. The '111 Patent term continues to run during litigation, and the loss of patent-supported exclusivity during potentially years of litigation may exhaust the life of the patent and deplete the invention's value to the inventor. *See Douglas Dynamics*, 717 F.3d at 1345 ("Exclusivity is closely related to the fundamental nature of patents

as property rights. It is an intangible asset that is part of a company's reputation, and here, [patent owner's] exclusive right to make, use, and sell the patented inventions is under attack by [defendant's] infringement.”). In the present case, the principal benefit of the ‘111 Patent to Sea Swivel is the exclusivity it provides.

An injunction here will allow Sea Swivel to maintain exclusivity on products embodying its invention—which is the sole benefit it derives from its ‘111 Patent. In addition, an injunction likely will deter other infringers who otherwise might be tempted to piggy-back on Sea Swivel’s success and exploit the market that Sea Swivel created with the patented Sea Swivel trolling motor mount.

Finally, Plaintiff has no adequate remedy at law, as monetary damages are wholly insufficient to address the ongoing, incalculable harm inflicted upon its goodwill, market share, reputation in the marketplace, and the resulting price erosion—all directly attributable to Defendants’ individual, deliberate and widespread introduction of infringing products into the marine accessory industry. As a direct and proximate result of each Defendant’s willful conduct and continued sale and distribution of their respective Infringing Products, Plaintiff has suffered, and will continue to suffer, immediate and irreparable harm for which monetary compensation is neither adequate nor appropriate.

c. THE BALANCE OF HARDSHIPS FAVORS SEA SWIVEL

In “balancing the hardships,” the Court must weigh the harm to the accused infringer if the Court wrongly issues a preliminary injunction against the harm to the patentee if the Court wrongly denies the injunction. *H.H. Robertson, Co. v. United Steel Deck, Inc.*, 820 F.2d 384, 390 (Fed. Cir. 1987).

In weighing these harms, the Court must consider the patentee's likelihood of success on the merits. *H.H. Robertson*, 820 F.2d at 390. The higher the patentee's likelihood of success, the less likely that accused infringer would be "harmed" at all. This balance of hardships factor weighs in Sea Swivel's favor because it is highly likely to succeed on the merits, as reflected above. The respective Infringing Products not only meet all the limitations of Claim 1, but each practice the preferred embodiment illustrated in the patent. Furthermore, Sea Swivel is likely to succeed in showing willful conduct against Shuttleslide.

The balance of hardships factor weighs in Sea Swivel's favor for other reasons as well. Even assuming Defendants could show that it would be harmed by an injunction, that harm would not exceed the irreparable harm Sea Swivel would suffer if the infringement were to continue, as identified above. The Defendants have been on notice of Sea Swivel patent and took a calculated risk by continuing to engage in patent infringement. Under such circumstances, courts sometimes refuse to assign any "harm" to the defendant because it assumed the risk. *See Celsis In Vitro, Inc. v. CellzDirect, Inc.*, 664 F.3d 922, 931 (Fed. Cir. 2012) ("[T]he preliminary record suggests that LTC's losses were the result of its own calculated risk in selling a product with knowledge of Celsis' patent.").

Critically, the harm that Defendants, individually, will suffer is the exact market share they have stolen from Plaintiff through the over saturation of the Defendants' individual, and respective Infringing Products, which is only magnified with the circulation of the SS Infringing Products through the Mass Keystone distribution network. Accordingly, the harm to Plaintiff in losing its market share necessarily outweighs any harm Defendants may suffer in capitalizing on the stolen market share. Thus, upon a balance of the harms between Plaintiff and Defendants, the significant loss Plaintiff has suffered and will continue to suffer at the hands the Defendants, demands granting

a preliminary injunction against each individual Defendant against their respective Infringing Product.

Furthermore, Defendants may provide credible evidence of harm, where that harm could be offset by an injunction bond and would ensure that any Defendant receive just compensation. Conversely, Sea Swivel cannot be afforded such assurance.

Lastly, an injunction limited exclusively to the Defendants' respective infringing products would permit them to continue with their business. For example, Shuttleslide may continue selling its flagship offering, the Shuttleslide retractable mount. Likewise, T/6 Marine would retain the ability to market and sale, among other products, its "ToonBOSS HD" and "ToonBOSS" trolling motor mounts. Finally, Rhodan Marine can continue to sell its principal products, including its comprehensive lineup of trolling motors.

d. PUBLIC INTEREST FAVORS GRANTING A PRELIMINARY INJUNCTION, ENJOINING DEFENDANTS' RESPECTIVE INFRINGING CONDUCT

The public interest analysis here also weighs in Sea Swivel' favor. First, as the Federal Circuit has recognized, public interest favors the enforcement of patent rights. *PPG Indus., Inc. v. Guardian Indus. Corp.*, 75 F.3d 1558, 1567 (Fed. Cir. 1996). When evaluating the public interest inquiry courts consider whether there is a "critical public interest" that may be harmed if the court grants preliminary injunctive relief. *See Hybritech Inc. v. Abbott Laboratories*, 849 F.2d 1446, 1458 (Fed. Cir. 1988). Moreover, where plaintiff demonstrates a clear likelihood of success on the merits, courts often find that public interest is best served by enforcing patent rights. *Abbott Labs. v. Andrx Pharms., Inc.*, 452 F.3d 1331, 1348 (Fed. Cir. 2006).

In the present case, the public has no "critical" interest in having the Defendants continue to sell their infringing version of a swiveling trolling motor mount—particularly when that product is inferior and Defendants, individually, have created consumer confusion. Conversely, the public

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does have an interest in enjoining cheap copies of patented inventions, “which have the effect of inhibiting innovation and incentive.” *Douglas Dynamics*, 717 F.3d at 1346. “This detrimental effect, coupled with the public’s general public interest in the judicial protection of property rights in inventive technology, outweighs any interest the public has in purchasing cheaper infringing products.” *Id.* Accordingly, the public interest factor supports a preliminary injunction here against the Defendants.

e. SECURITY

The Court has broad discretion to set the amount of bond, as well as to waive it entirely where appropriate. *See Carillon Imps., Ltd. v. Frank Pesce Int’l Grp., Ltd.*, 112 F.3d 1125, 1127 (11th Cir. 1997) (“The amount of an injunction bond is within the sound discretion of the district court.”); *BellSouth Telecomms., Inc. v. MCI Metro Access Transmission Servs., Ltd. Liab. Co.*, 425 F.3d 964, 971 (11th Cir. 2005) (“the court may elect to require no security at all”) (internal citations omitted).

Here, the Defendants, individually, and separately, knowingly, and intentionally knocked off the Sea Swivel, and infringed Plaintiff’s patent rights. Such conduct is egregious, and no conceivable harm flows to the individual Defendants if they prohibited from further violating Plaintiff’s rights. Plaintiff thus requests the requirement of a bond be waived. *See Celsis in Vitro, Inc.*, 664 F.3d at 931 (Fed. Cir. 2012).

Alternatively, Plaintiff is prepared to give security in the amount of \$10,000.00, or any other amount that the court considers proper, to pay the costs and damages sustained by each individual, Defendant in the event it is found to have been wrongfully enjoined. Plaintiff does not oppose the issuance of a bond, but respectfully asks the Court to consider each Defendant’s pre-

suit and current willful misconduct when determining the amount of such security, especially Shuttleslide being placed on notice of its intentional infringement as of March 2025.

V. CONCLUSION

Sea Swivel respectfully requests that this Court to enter the Proposed Order (attached), which preliminarily enjoins Defendants, RHODAN MARINE SYSTEMS OF FLORIDA, LLC, SHUTTLESLIDE LLC, and DREAM MACHINE & PROTOTYPING, LLC d/b/a T/6 Marine (until this action is fully resolved) from making, using, selling, offering for sale, importing, or causing others to make, use, sell, offer for sale, or import, each of their respective Infringing Products, including but not limited to, through their eCommerce website, through any distributors, and offering to sell anywhere in the United States.

Dated: October 16th, 2025.

Respectfully submitted,

EPGD BUSINESS LAW P.A.

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CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on October 16th, 2025, the foregoing was filed with the Clerk of Court through CM/ECF. We also certify that the foregoing document is being served this day on all counsel of record either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Albert D. Sabater
ALBERT D. SABATER, ESQ.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO. 25-CV-23581-RKA

SEA SWIVEL INC, a Florida Corporation,

Plaintiff,

v.

RHODAN MARINE SYSTEMS OF
FLORIDA, LLC, et al.,

Defendants.

**DECLARATION OF MARK BERTA IN SUPPORT OF SEA SWIVEL, INC.'S
MOTION FOR PRELIMINARY INJUNCTION AGAINST DEFENDANTS**

I, Mark Berta, hereby declare as follows:

1. I am over the age of 18 and fully competent to make this declaration. I have personal knowledge of the matters stated within this declaration and if called and sworn as a witness, I could and would competently testify thereto, under oath.

2. This declaration is based upon my personal knowledge of the facts stated herein or on the business records that were made at the time or in the regular course of business. If called as a witness, I could and would testify to the statements made herein.

3. I am president of SEA SWIVEL INC., and the inventor of the patented Sea Swivel, for which Billet Industries, Inc., is an exclusive worldwide manufacturer. The patented Sea Swivel was an engineered rotating trolling motor mount that gives one complete lateral control over a trolling motor—no need to remove it from the deck. Effortlessly redirect thrust or stow your motor, all without the hassle of detaching or disassembling anything. The Sea Swivel can handle even the heaviest and largest trolling motors on the market.

4. Due to the success of the Sea Swivel trolling motor mount, several of the biggest distributors and retailers, including CWR Wholesale Electronics, West Marine, Wintron Electronics Wholesale, Boat Outfitters, and Port Supply market and sell the Sea Swivel.

FACTUAL BACKGROUND

5. Since 2023, Sea Swivel Inc. has focused on innovating a suite of marine trolling motor accessories including its flagship innovation, the Sea Swivel, which 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. A picture of the Sea Swivel trolling mount is below:



6. Through innovation, attention to product quality and ongoing adherence to customer satisfaction, the Sea Swivel has developed significant brand recognition and goodwill among the marine industry customers and generated a meaningful reputation for quality and value.

7. The Sea Swivel is proudly used and endorsed by some of the biggest names in the angling industry including Capt. Nick Stanczyk of Stanz Fishing, Viktor Hlubien from Landshark Outdoors, and Capt. Mike Genoun of Florida Sport Fishing, all of which have produced countless videos featuring the Sea Swivel with well over 1-million views, respectively.

8. To build its goodwill and generate its reputation, Sea Swivel Inc.-a small business-invested an enormous amount of time, effort, and money. In addition to countless hours spent creating, developing, and fine-tuning the Sea Swivel. It has devoted time and effort to implementing quality controls and to providing prompt and courteous customer service. And over the past 3 years, Sea Swivel Inc. invested more than \$500,000.00 in marketing and advertising through many channels, including YouTube, and social media marketing.

9. To date, I have personally expended more than \$500,000.00 into researching, developing, marketing, advertising, and patenting the Sea Swivel. Sea Swivel Inc. has expended substantial time, money, and other resources advertising and otherwise promoting the Sea Swivel, which utilizes certain features and methods set out in portions of the Sea Swivel Patent. I am informed and believe that, as a result, the Sea Swivel is widely recognized and exclusively associated by customers, the public, and the trade as being the leading Trolling Motor Mount in the world.

10. While Sea Swivel Inc. maintains its eCommerce website to sell its products, roughly 80% of Sea Swivel Inc.'s revenue is generated through its commercial distribution and OEM purchases. The majority of Sea Swivel Inc.'s revenue is derived from the same sources from which the Defendants are now selling their Infringing Products in direct competition with the Sea Swivel.

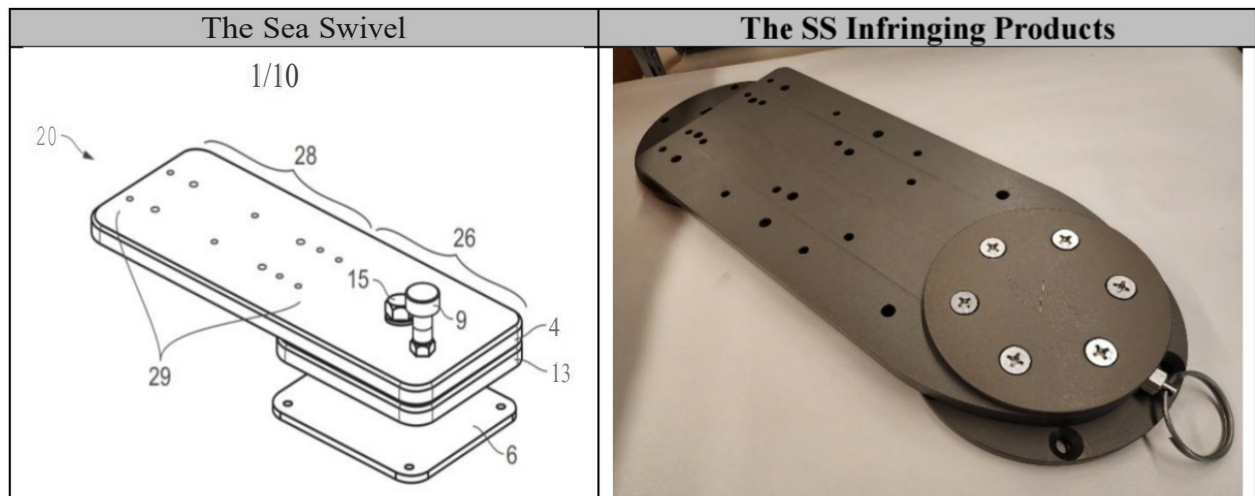
11. Sea Swivel Inc. has obtained U.S. Patent No. 12,258,111 (the "'111 Patent" or "Sea Swivel Patent"). The Sea Swivel Patent is valid, and in full force and effect.

12. I am the sole inventor on the '111 Patent.

SHUTTLESLIDE'S ACCUSED PRODUCTS

13. Shuttleslide LLC ("Shuttleslide") sells two (2) infringing products — the SS.7.5R and the SS9.5R trolling motor mounts (collectively "SS Infringing Products").

14. To show how close Shuttleslide's Infringing Products resemble, including the functionality of the Sea Swivel, I provide photos of the two products side-by-side below. The SS Infringing Products are priced between \$749.99 and \$799.99 which undercuts the comparable patented Sea Swivel mount price of \$1,099.99 and presents to be a head-to-head competitor.



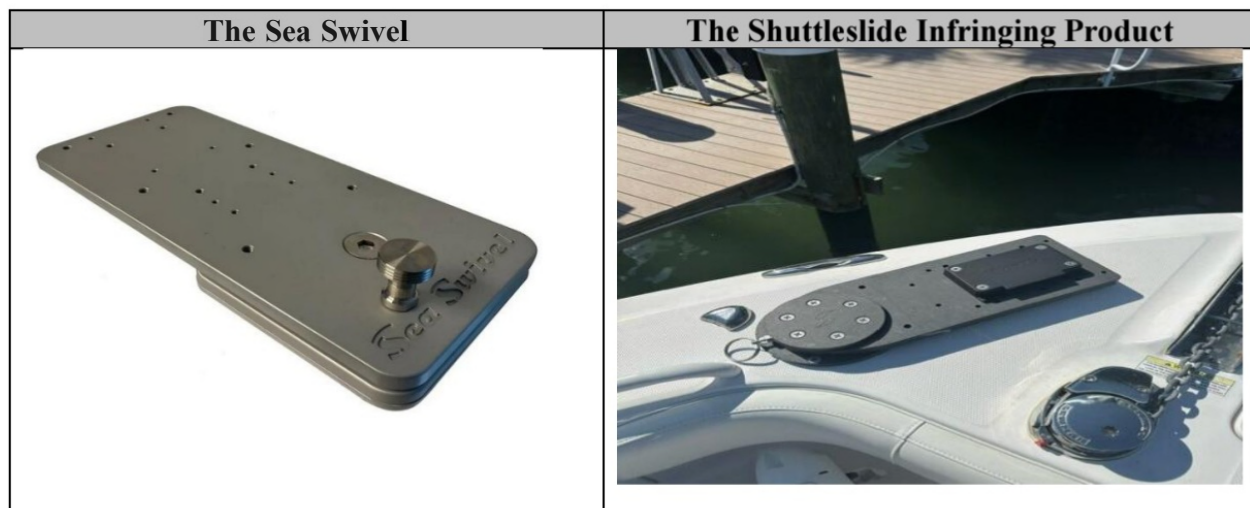
15. In addition to eCommerce websites, I recently became aware that Shuttleslide's Infringing Products are now being sold through one of the largest distributors in the automotive industry and marine industry—Keystone Automotive through its marine section, SeaWide (the "Mass Keystone Distribution Agreement"). SeaWide claims to have the largest network in the Marine Aftermarket. Below is a screenshot from Keystone's website claiming their nationwide reach.



16. The significance of the Mass Keystone Distribution Agreement was made apparent when many of my OEM distributors and retailers were advising me of Keystone sales representatives were offering Shuttleslide's Infringing Products in head-to-head competition of the Sea Swivel. These aggressive sales tactics and distribution initiative of Keystone ran from Key West, Florida through the Northern parts of Florida, and beyond.

17. As shown in the pictures above, both the Sea Swivel and Shuttleslide's Infringing Products function the same way by permitting a trolling motor to swivel upon an axis.

18. Shuttleslide's own website state its device allows its user to "swivel" the trolling motor into position. The image below compares a sample of the patented Sea Swivel (left) with Shuttleslide's Infringing Products (right).

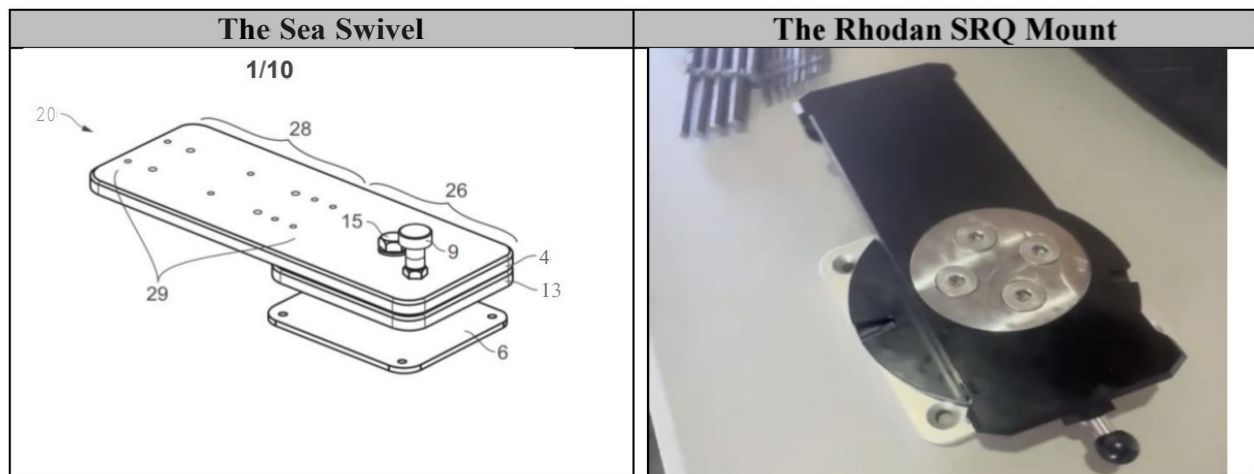


19. Shuttleslide's Infringing Products capitalize on the key features of the Sea Swivel which are protected by the Sea Swivel Patent.

RHODAN'S ACCUSED PRODUCT

20. Rhodan Marine Systems of Florida, LLC ("Rhodan") sells its infringing product—the SRQ Bracket trolling motor mounts ("Rhodan's Infringing Product" or "SRQ Bracket").

21. To show how close Rhodan's Infringing Product resembles, including the functionality of the Sea Swivel, I provide below screenshots of the two products side-by-side. The SRQ Bracket is priced at \$499.99 which undercuts the comparable patented Sea Swivel mount price of \$1,099.99 and presents to be a head-to-head competitor with the Sea Swivel.



22. Through Rhodan's eCommerce website, and through its distributors that it identifies as a "patent pending SRQ Mount continues that tradition of innovation by being the first device to provide slide, rotation, and quick-release functionality in a single mount.

23. Although Rhodan appears to have removed the SRQ Bracket from its website, multiple distributors—including Hodges Marine, NVM Marine, and Clinch River Fishing USA—continue to offer the SRQ Mount for sale. In the absence of an injunction, there is a significant risk

that Rhodan will resume listing the SRQ Bracket on its eCommerce website and continue its distribution.

24. As shown in the pictures above, both the Sea Swivel and Rhodan's Infringing Product function the same way by permitting a trolling motor to swivel upon an axis.

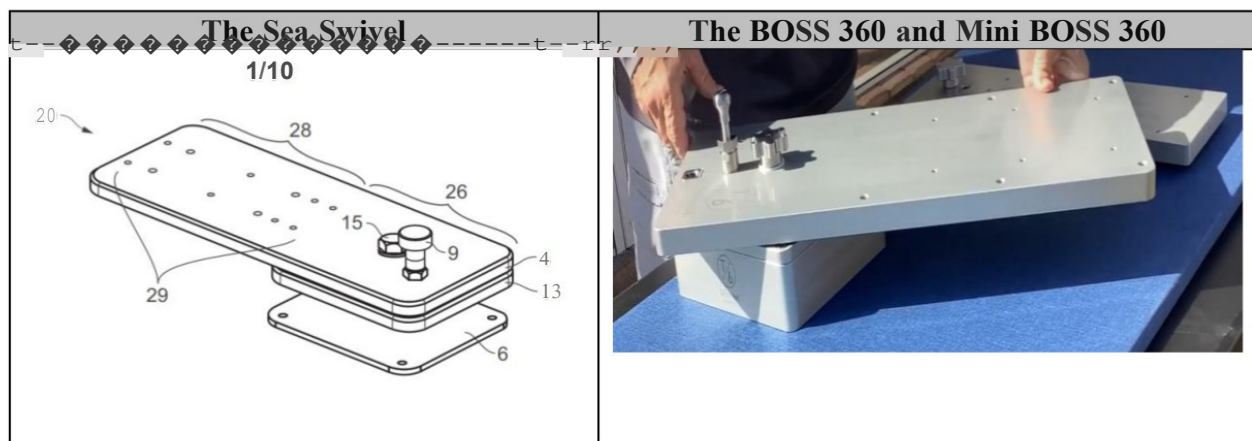
25. Rhodan's own website states its SRQ Bracket is the first device to provide slide, rotation, and quick-release functionality in a single mount.

26. Rhodan's SRQ Bracket capitalizes on the key features of the Sea Swivel which are protected by the Sea Swivel Patent.

T/6 MARINE'S ACCUSED PRODUCTS

27. Dream Machine & Prototyping, LLC d/b/a T/6 Marine ("T/6 Marine") sells its infringing products-the BOSS 360 and Mini BOSS 360 (collectively, "T/6's Infringing Products").

28. To show how close T/6's Infringing Products resemble, including the functionality of the Sea Swivel, I provide photos of the two products side-by-side below. T/6's Infringing Products are priced between \$1,249-\$1,279.00, which is comparable in price to the patented Sea Swivel mount price of \$1,099.99 and presents to be a head-to-head competitor with the Sea Swivel.



29. Through T/6 Marine's eCommerce website, it sells the T/6 Infringing Products the BOSS 360 and Mini BOSS 360, along with various marine retailers including, but not limited to Fish Tale Boats, in Lee County, Florida.

30. As shown in the pictures above, both the Sea Swivel and T/6's Infringing Products not only function *identically* to the patented Sea Swivel but also resemble the actual appearance of the Sea Swivel.

31. T/6 Marine's own website states its Infringing Products are the "ultimate 360 rotating quick release trolling motor mount designed for precision and convenience." This is the key feature of the Sea Swivel.

32. Hence, T/6's Infringing Products capitalize on the key features of the Sea Swivel which are protected by the Sea Swivel Patent.

HARMS CAUSED BY SHUTTLESLIDE

33. Shuttleslide's Infringing Products compete directly with the patented Sea Swivel on its eCommerce website and through its distributors and other retailers-where Sea Swivel Inc. derives 80% of its revenues. In conjunction with the Mass Keystone Distribution Agreement, Shuttleslide's Infringing Products have caused Sea Swivel Inc. to lose revenue and market share and will continue to do so if these sales are not stopped.

34. Shuttleslide has blatantly copied the patented features of the Sea Swivel, particularly using the "swiveling" feature to describe Shuttleslide's Infringing Products. The copying of these elements is an apparent effort to benefit from the goodwill and reputation that has taken Sea Swivel over almost three years to build.

35. As mentioned above, depending on which product one buys, the price of Shuttleslide's Infringing Products undercuts the Sea Swivel's pricing by 20% to 25%.

a. Shuttleslide's Patent Infringement is Eroding Sea Swivel's Goodwill and Reputation.

36. Shuttleslide promotes the Shuttleslide Infringing Products by exploiting the marine industry market niche that Sea Swivel Inc. created with the patented design embodied in the Sea Swivel. Shuttleslide has exploited this market niche by appropriating Sea Swivel's patented design, designing virtually a carbon copy of the Sea Swivel, using a similar description, and describing Shuttleslide's Infringing Products' ability to swivel, directly harming Sea Swivel Inc.'s reputation on the marketplace.

37. For instance, on or around July 6, 2025, I received a customer support call from someone frustrated with his trolling motor mount. After several minutes spent diagnosing the issue, the customer revealed that his mount was a "Shuttleslide," not a Sea Swivel. Because Shuttleslide aggressively markets its product using the same language as the Sea Swivel, many customers conflate the two products and fail to recognize the significant differences. In this case, the customer assumed he purchased a Sea Swivel. This ongoing confusion directly damages Sea Swivel Inc.'s reputation for true innovation and erodes the market recognition earned by our patented, industry-leading trolling motor mount.

b. Shuttleslide's has Demonstrated Intentional and Reckless Disregard Pre-suit and during this Action.

38. On or around October 7, 2025, Horacio Longoria from Billet Industries, and Sea Swivel's manufacturer and builder, notified me that Shuttleslide, through its owner, Russell Taylor approached them during recent boat show seeking proprietary and trade secret information related to the Sea Swivel.

39. I am concerned that Shuttleslide's actions were intended to seek information related to manufacturing process and details that are only known to Sea Swivel and Billet Industries.

Moreover, should Shuttleslide require third-party information it should be done in this action where certain safeguards are in place with disclosing any proprietary information (if so required).

40. Shuttleslide's actions demonstrate an urgent need to prevent further harm to Sea Swivel. Unless Shuttleslide is enjoined from selling the SS Infringing Products in violation of the '111 Patent, Sea Swivel will continue to suffer irreparable harm that cannot be adequately remedied by monetary damages alone.

HARMS CAUSED BY RHODAN

41. Rhodan's Infringing Product competes directly with the patented Sea Swivel on its eCommerce website and through its distributors and other retailers-where Sea Swivel Inc. derives 80% of its revenues. In conjunction with Rhodan's established reach through its flagship trolling motor clientele exposure, the SRQ Bracket has caused Sea Swivel Inc., to lose revenue and market share and will continue to do so if these sales are not stopped.

42. Rhodan has blatantly copied the patented features of the Sea Swivel, particularly using the "swiveling" feature to describe the SRQ Bracket. The copying of these elements is an apparent effort to benefit from the goodwill and reputation that has taken Sea Swivel over almost three years to build.

43. As mentioned above, the price of Rhodan's Infringing Product undercuts the Sea Swivel's price by slightly over 50%.

a. Rhodan's Patent Infringement is Eroding Sea Swivel's Goodwill and Reputation.

44. Rhodan promotes the SRQ Mount by exploiting the marine industry market niche that Sea Swivel Inc. created with the patented design embodied in the Sea Swivel. Rhodan has exploited this market niche by appropriating Sea Swivel's patented design, designing virtually a

carbon copy of the Sea Swivel, using a similar description, and describing SRQ Bracket's ability to swivel, directly harming Sea Swivel Inc.'s reputation on the marketplace.

HARMS CAUSED BY T/6 MARINE

45. T/6 Marine's Infringing Products compete directly with the patented Sea Swivel on its eCommerce website and through its distributors and other retailers-where Sea Swivel Inc. derives 80% of its revenues. T/6's Infringing Products have caused Sea Swivel Inc., to lose revenue and market share and will continue to do so if these sales are not stopped.

46. T/6 Marine has blatantly copied the patented features of the Sea Swivel, particularly using the "swiveling" feature to describe the T/6 Infringing Products. The copying of these elements is an apparent effort to benefit from the goodwill and reputation that has taken Sea Swivel over almost three years to build.

47. As mentioned above, the price of T/6's Infringing Products is comparable to the Sea Swivel's price. Hence, the pricing of T/6's Infringing Products force Sea Swivel to compete with its own stolen patent design.

a. T/6 Marine's Patent Infringement is Eroding Sea Swivel's Goodwill and Reputation.

48. T/6 Marine promotes its Infringing Products by exploiting the marine industry market niche that Sea Swivel Inc. created with the patented design embodied in the Sea Swivel. T/6 Marine has exploited this market niche by appropriating Sea Swivel's patented design, designing virtually a carbon copy of the Sea Swivel, using a similar description, and describing the T/6 Infringing Product's ability to swivel, directly harming Sea Swivel Inc.'s reputation on the marketplace. Moreover, to a common user T/6's Infringing Products appear strikingly similar to the Sea Swivel.

HARMS CAUSE BY ALL DEFENDANTS

a. The Patent's Value to Sea Swivel is the Right to Market Exclusivity.

49. Sea Swivel Inc. has never licensed the '111 Patent and has no intention to do so in the future. The only value that Sea Swivel Inc. realizes from the '111 Patent (and the other U.S. and foreign patents in its intellectual property portfolio) is the right to prevent competitors like Shuttleslide from appropriating the patented Sea Swivel features and forcing Sea Swivel to compete against its own invention.

b. Non-Compensable Harm

50. My understanding is that Infringers often argue against preliminary injunctions claiming all the harms experienced by the patentee can be compensated for with monetary damages.

51. Here, however, Defendants, Shuttleslide, Rhodan, and T6 (collectively "Defendants") are harming Sea Swivel by diverting valuable (and severely limited) corporate time, resources, and energy. I run Sea Swivel with the assistance of my wife- that's the team. We are small business. Aside from the financial strain from litigating against Defendants, this litigation is a tremendous distraction and burden on my small company.

52. In the time that my wife and I spend litigating against infringers like Defendants, we could be growing our business, expanding into new marketplaces beyond the U.S., Canada, Mexico, South America, inventing new product features and variations to be patented and ultimately sold, expanding our distribution to traditional retail (*i.e.*, brick and mortar stores in the Florida keys), and dealing with suppliers and supply chain issues, etc.

53. As long as Defendants' infringement persists unabated, legal expenses may be recouped in part, but my lost management time is not compensable and is gone forever.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 16, 2025.



MARK.BERTA



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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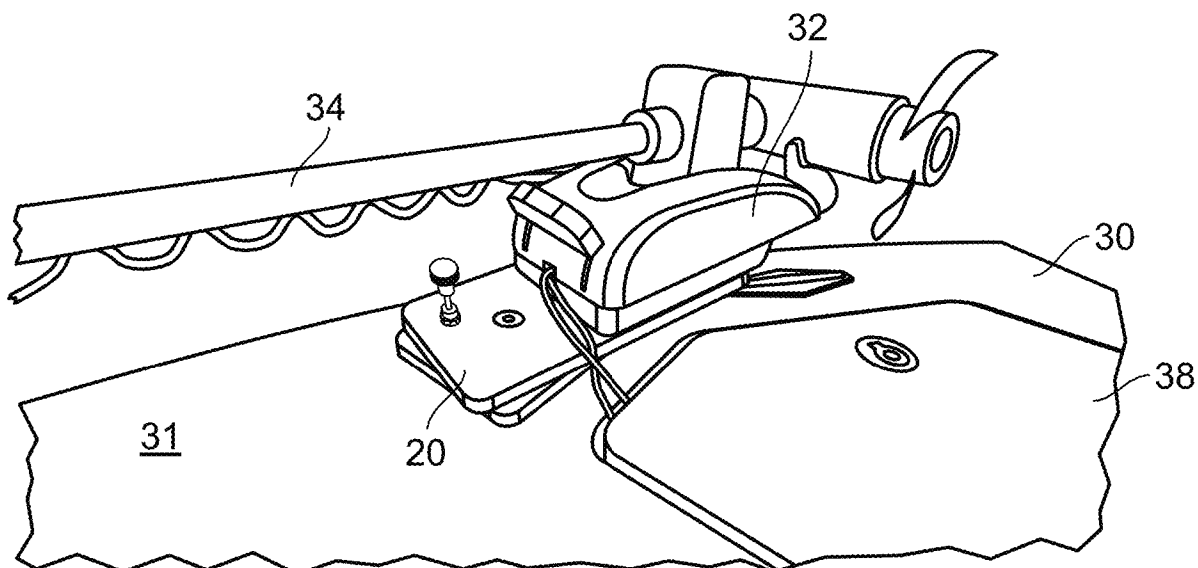
Primary Examiner — Steven M Marsh

(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



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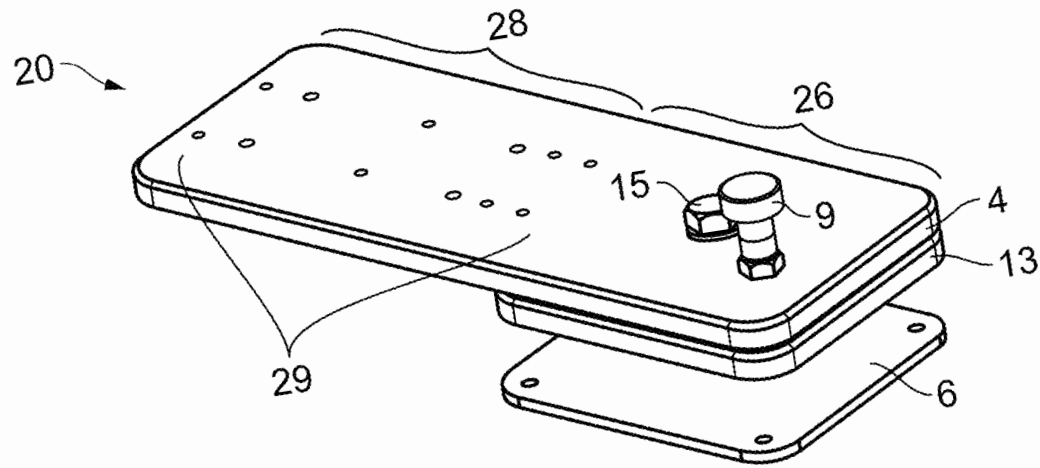


FIG. 1

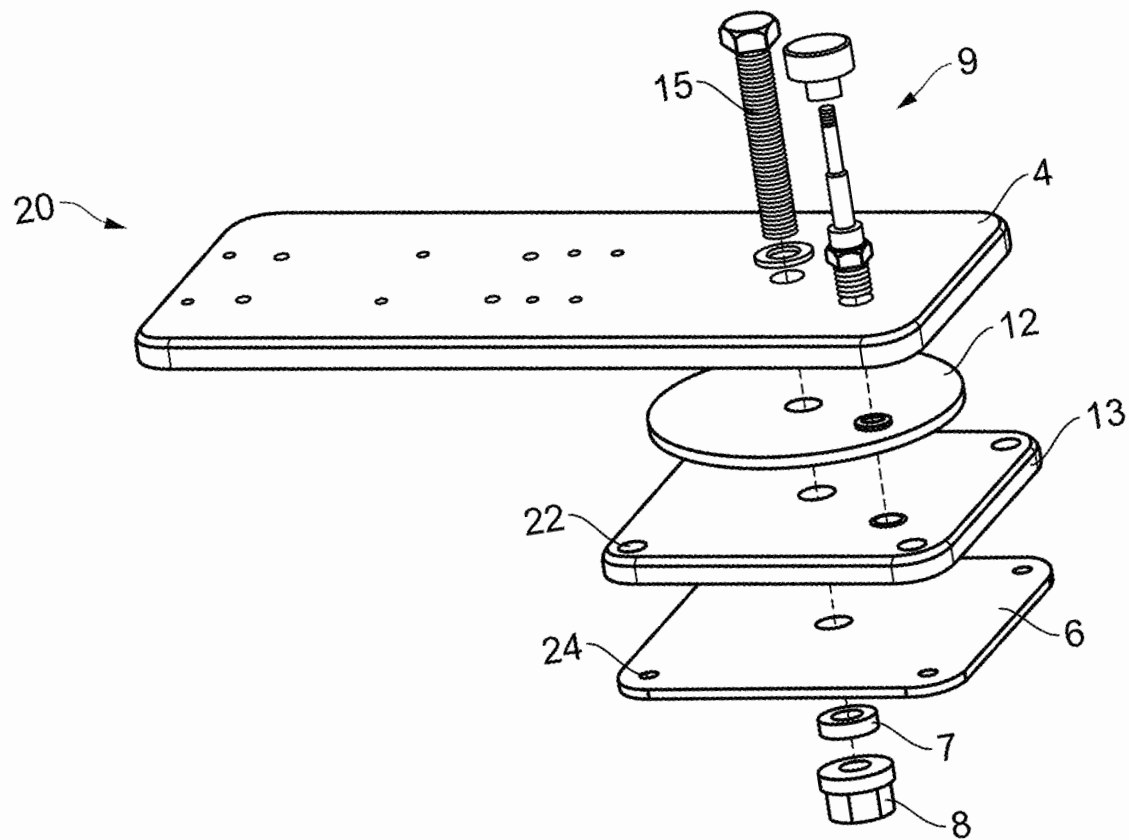


FIG. 2

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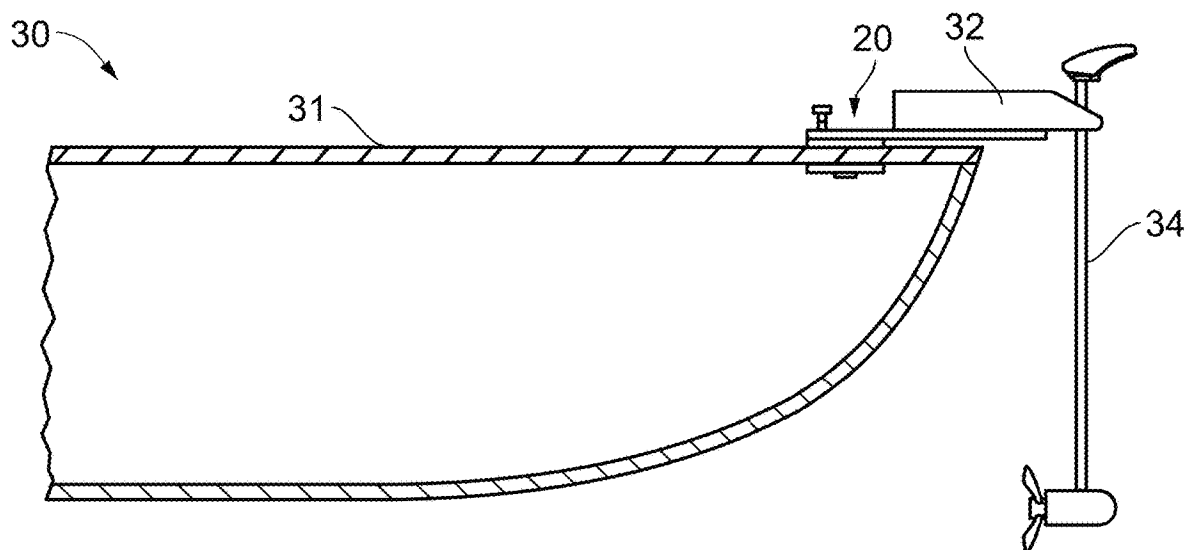


FIG. 3

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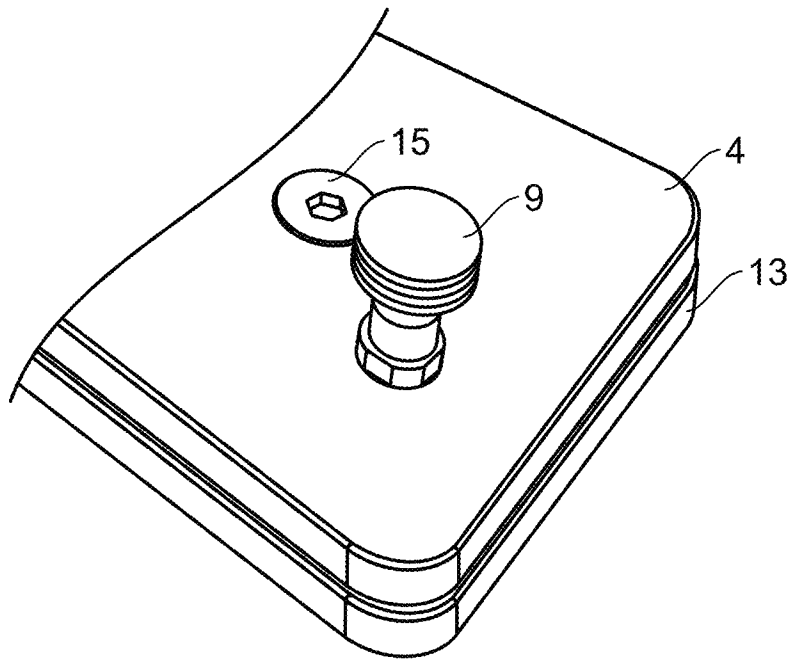


FIG. 4

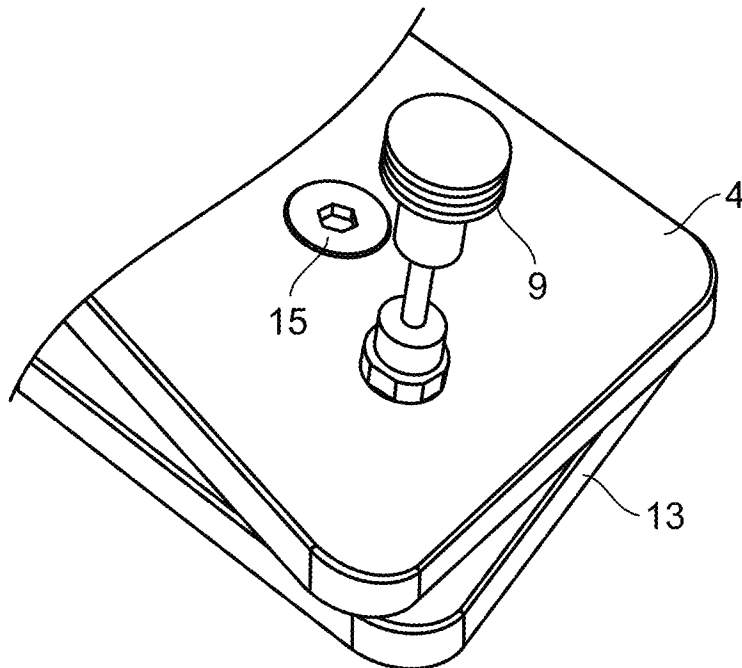


FIG. 5

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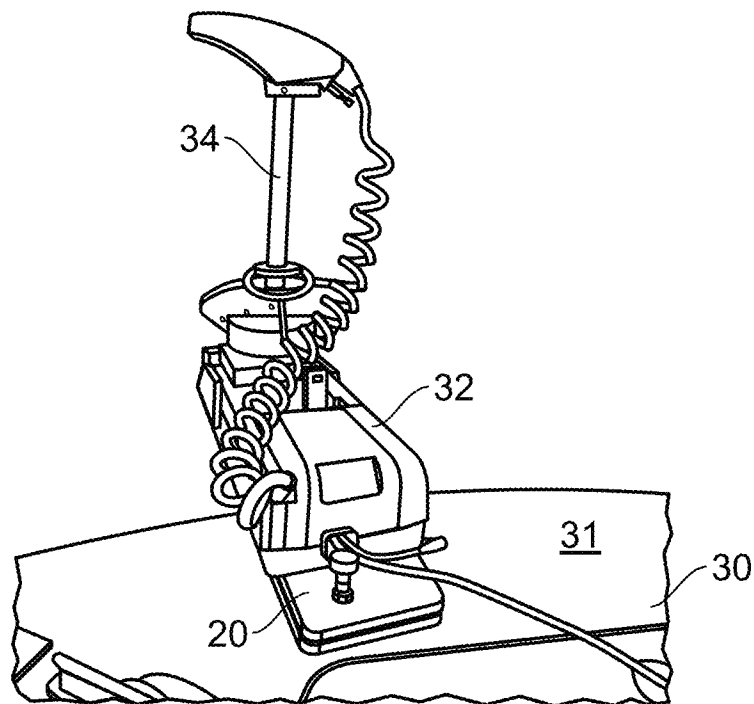


FIG. 6

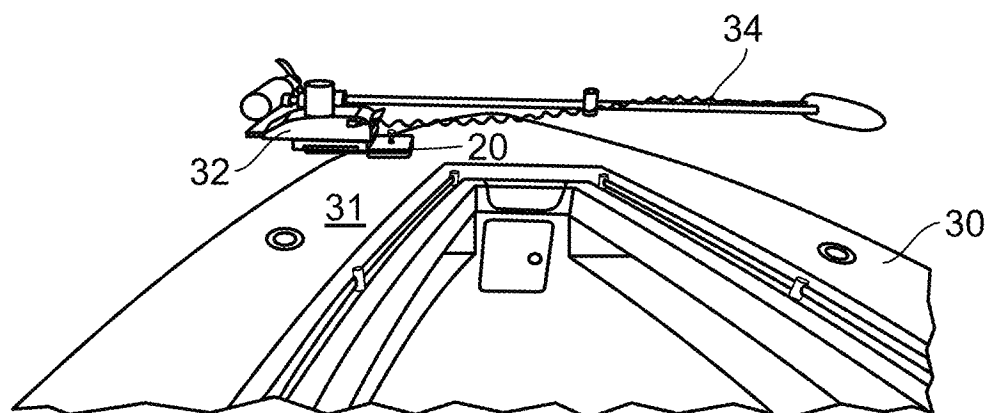


FIG. 7

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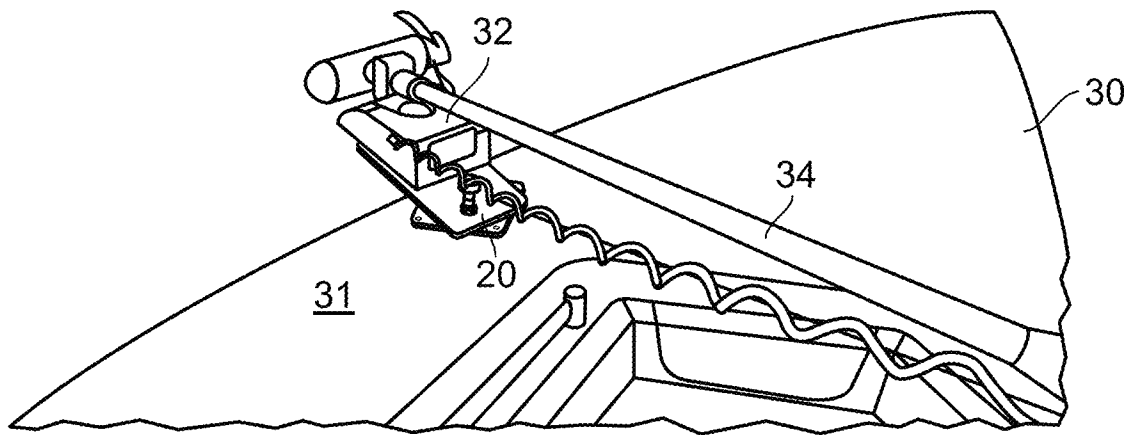


FIG. 8

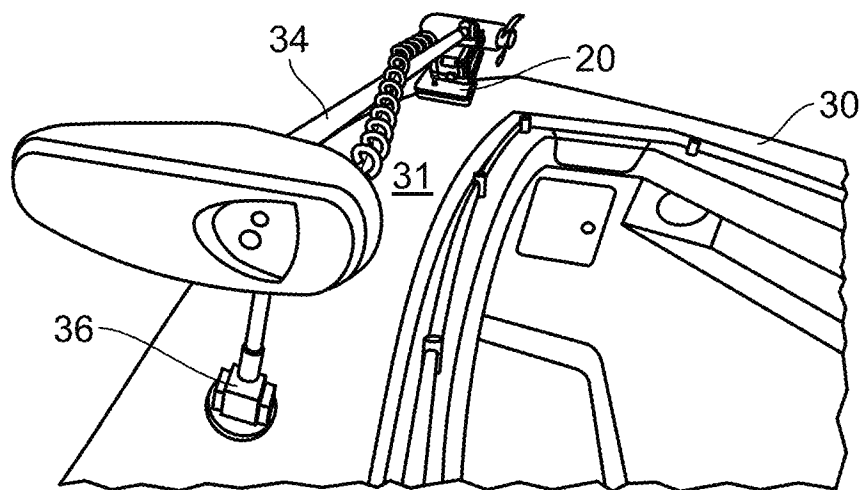


FIG. 9

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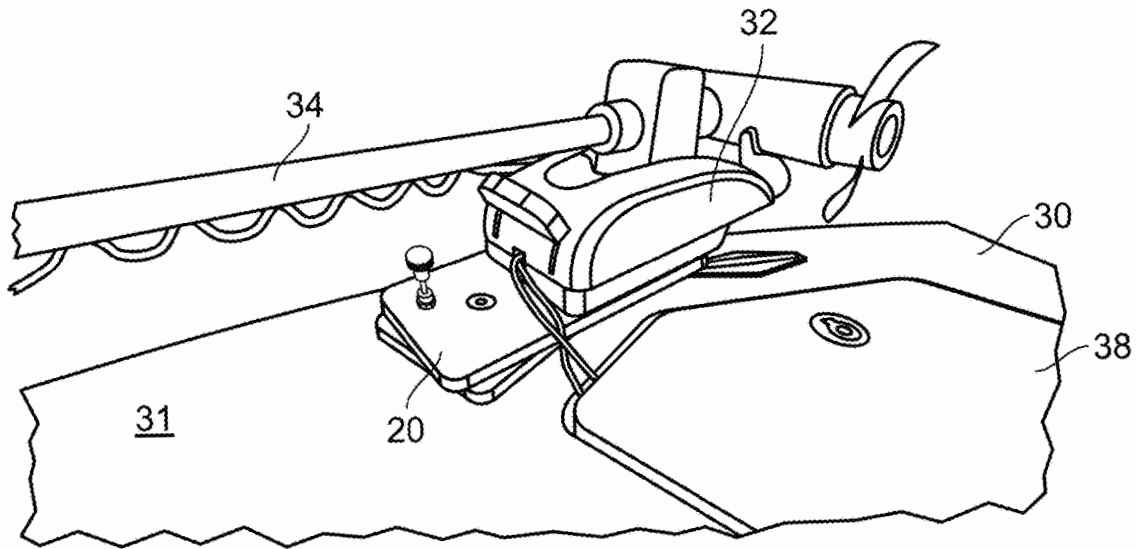


FIG. 10

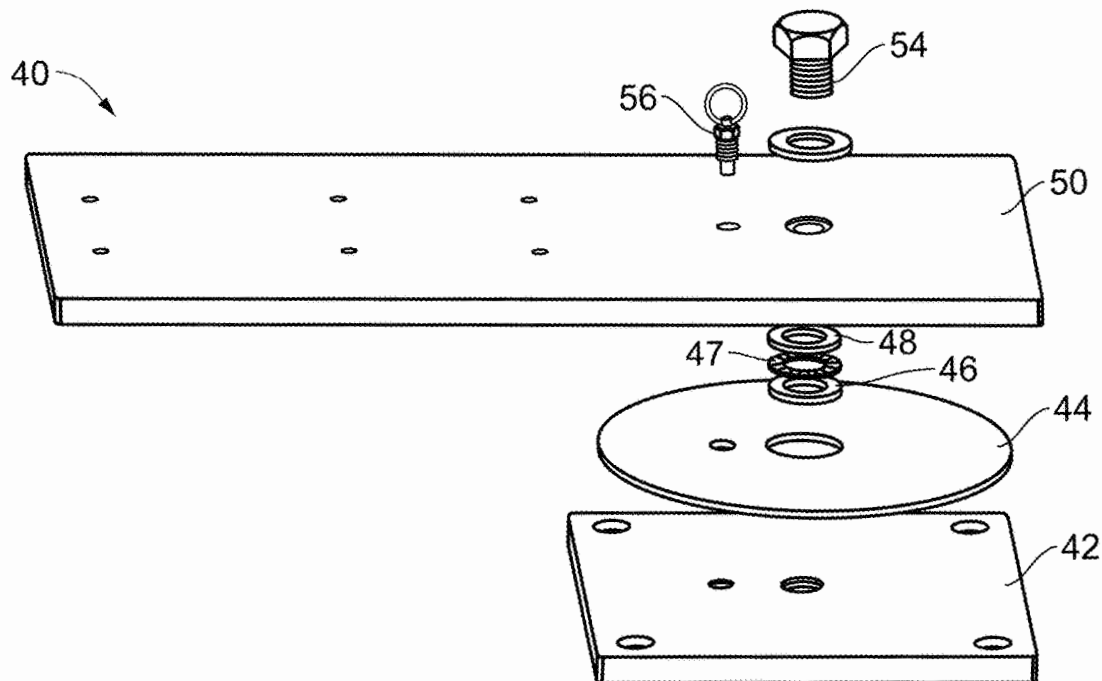


FIG. 11

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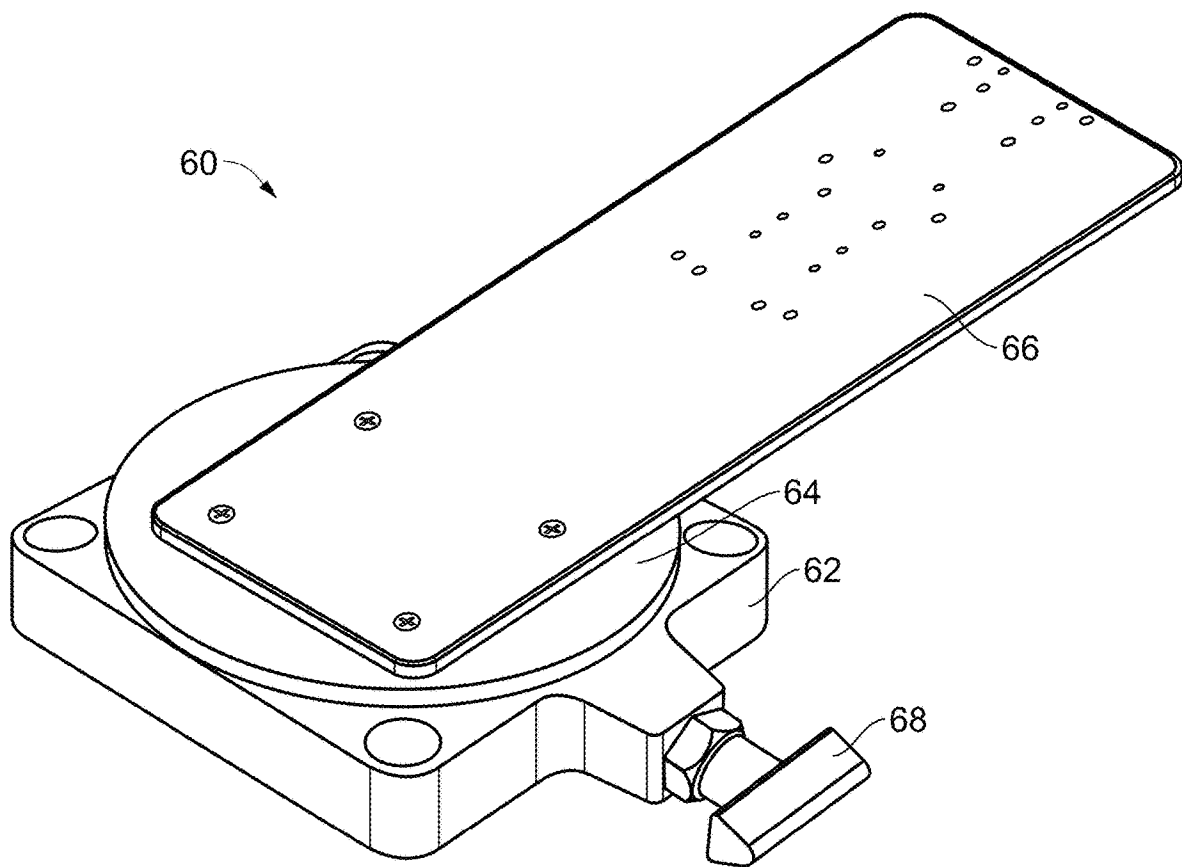


FIG. 12

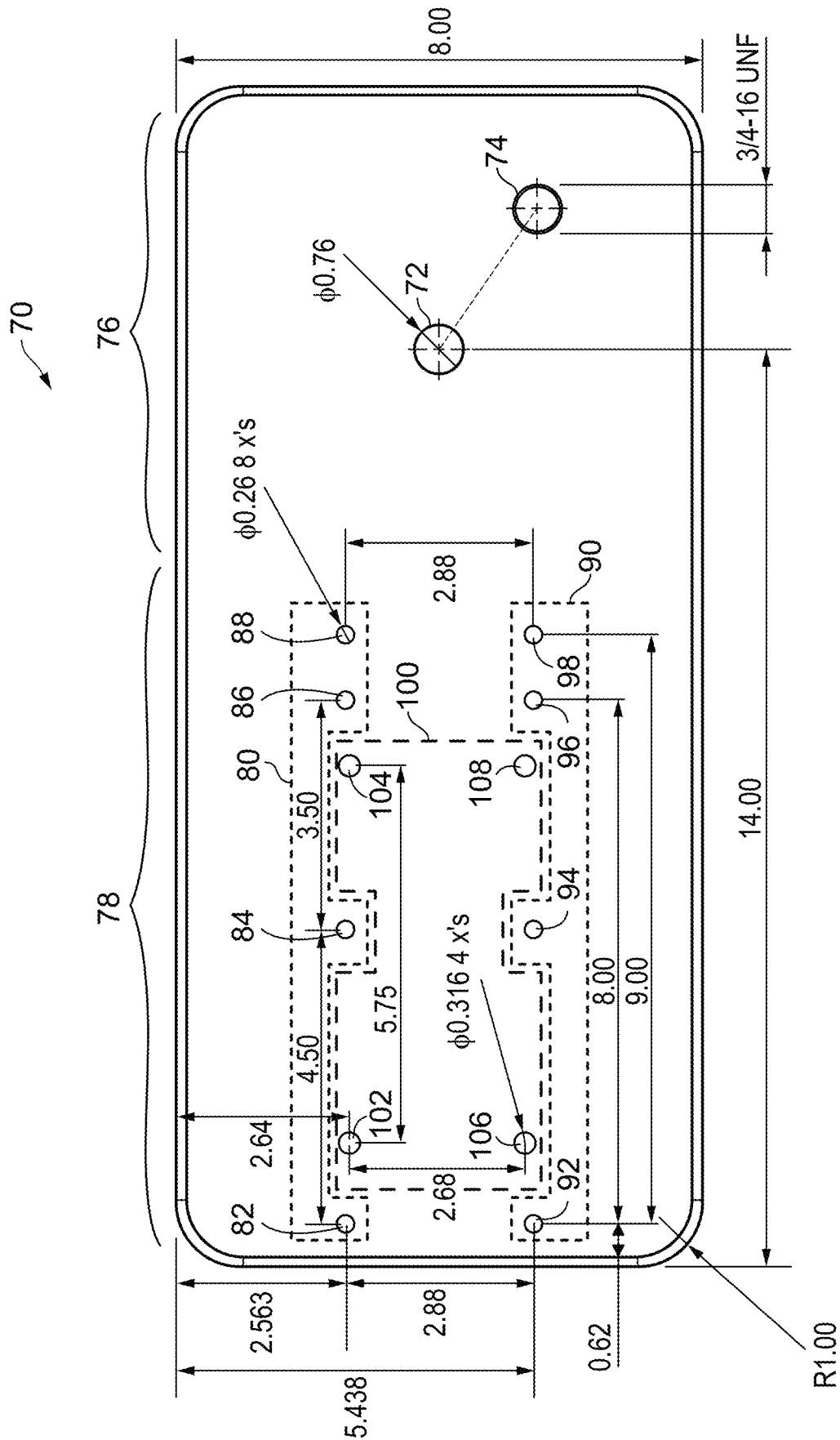


FIG. 13

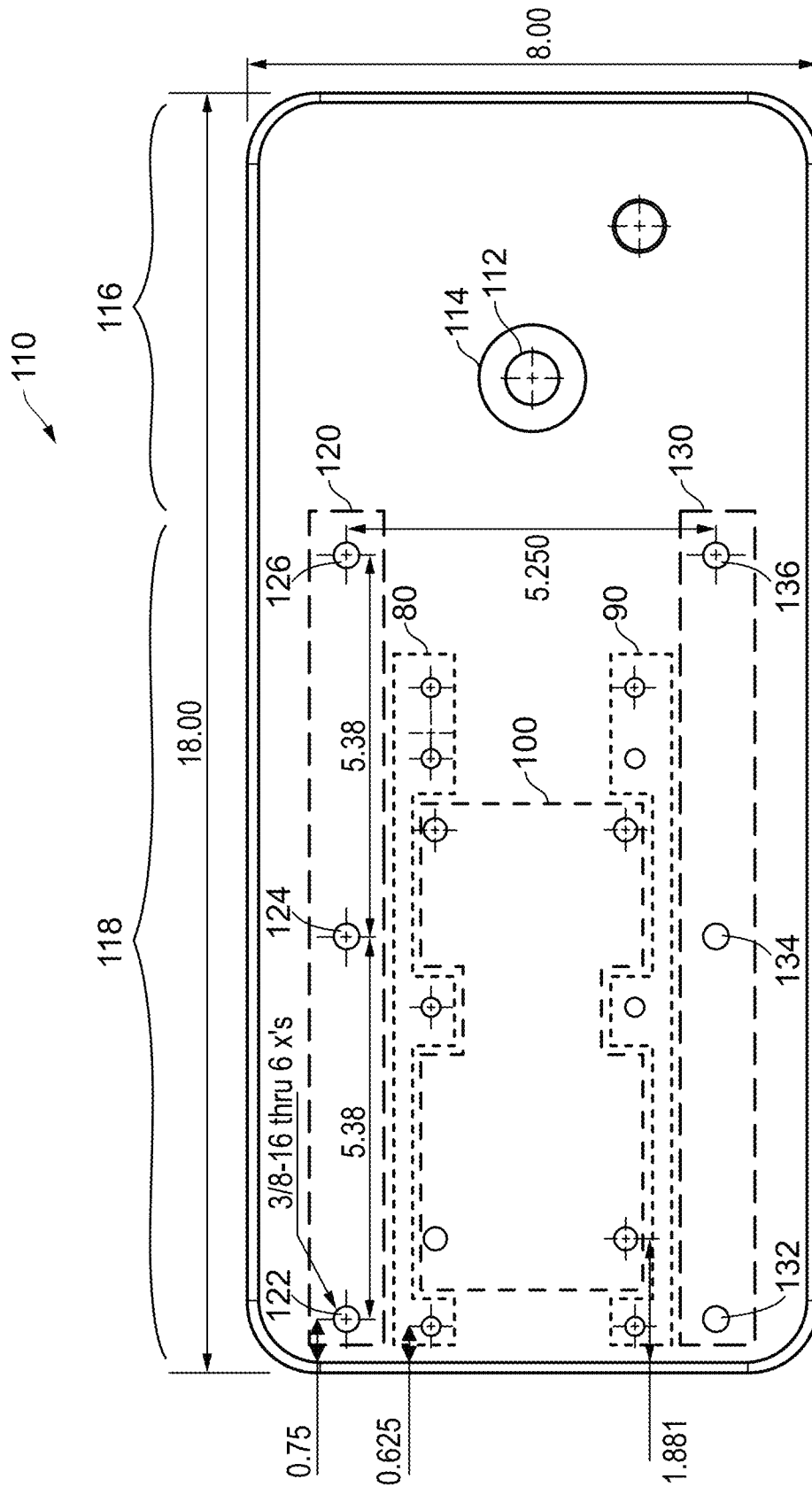


FIG. 14

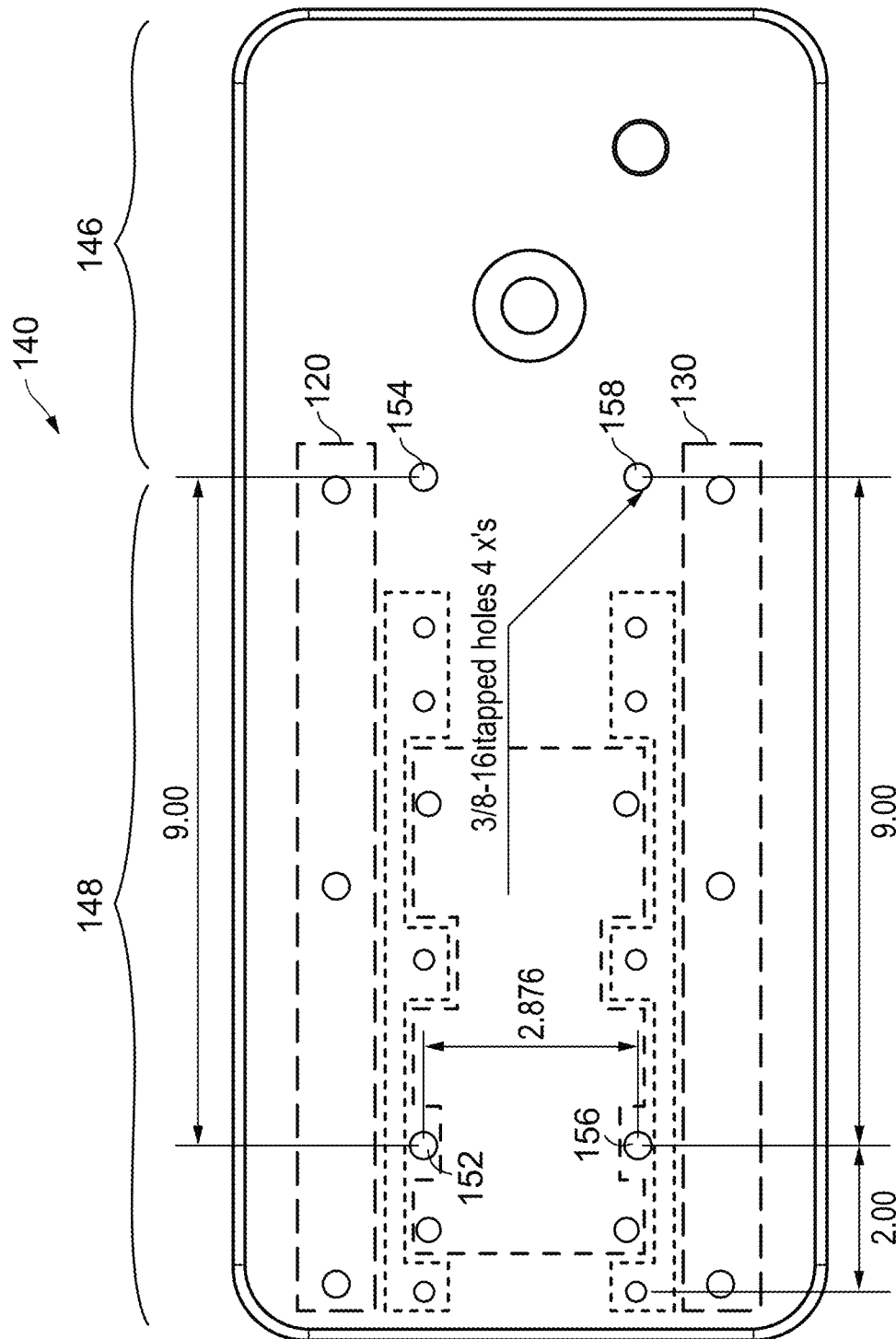


FIG. 15

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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 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 in 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 $\pm 5\%$ 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

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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:

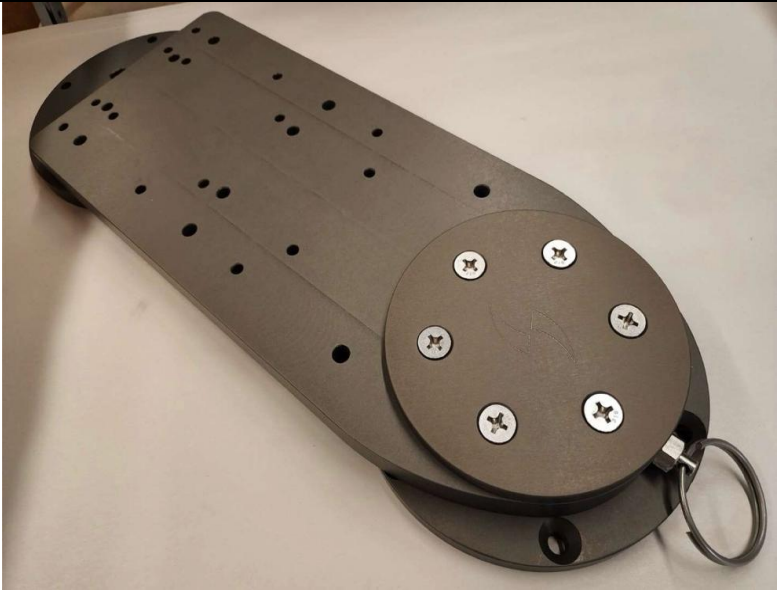
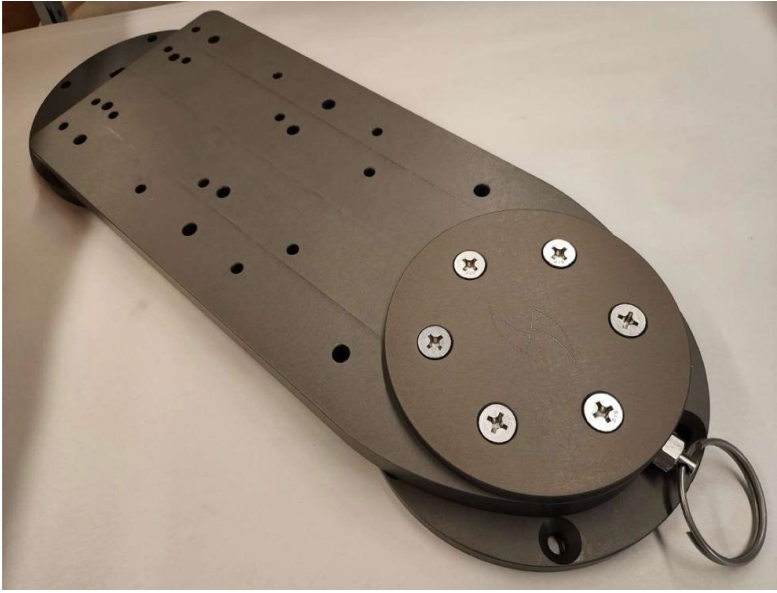
a first set of two holes having their center points 9.00 inches apart and linearly aligned parallel with the first set of four holes; and

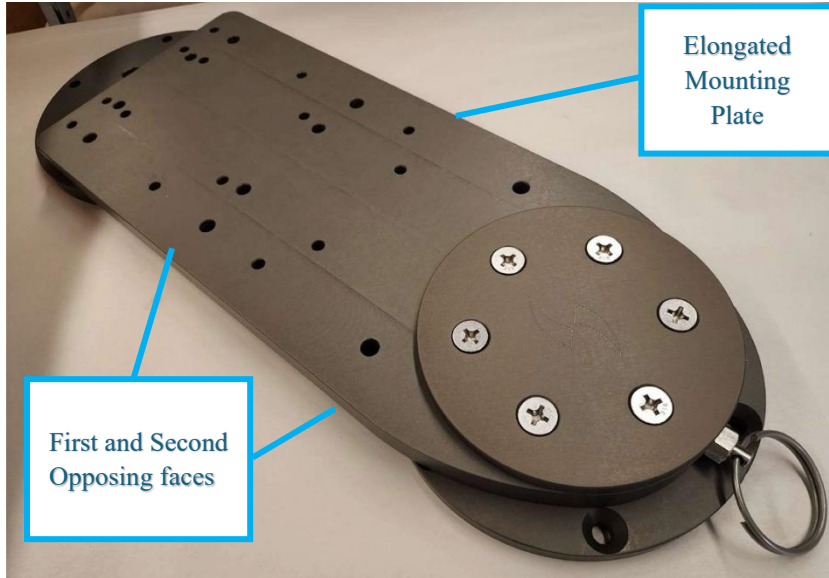
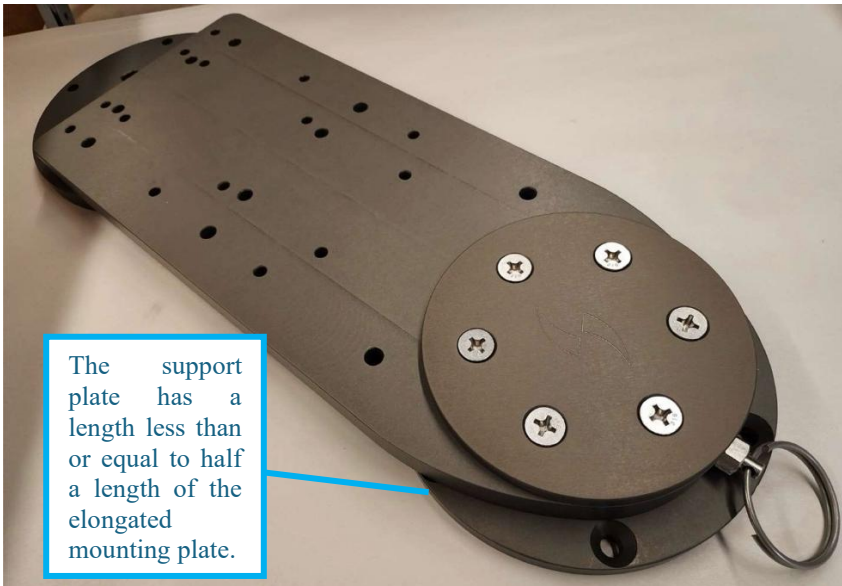
a second set of two holes each respectively in alignment with a different hole of the first set of two holes as taken along the width of the elongated mounting plate, wherein each of the second set of two holes has a center point spaced 2.876 inches from a center point of its respective different hole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

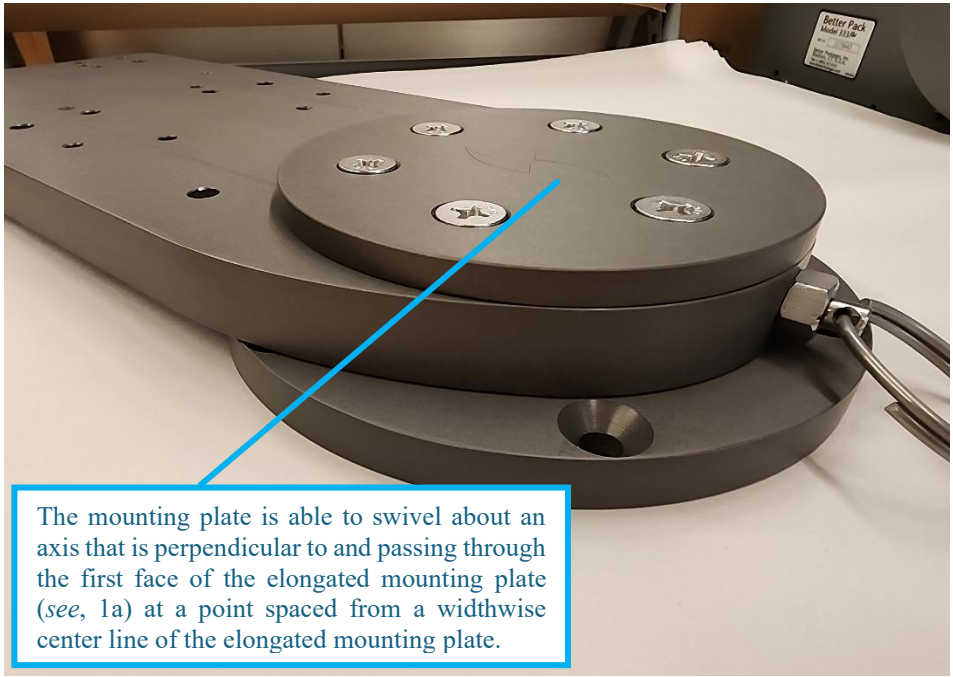
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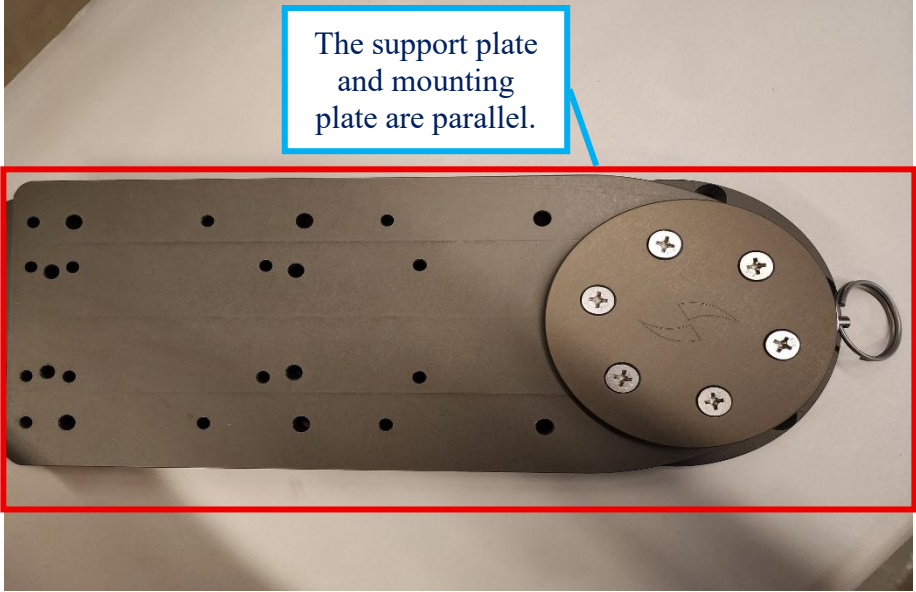
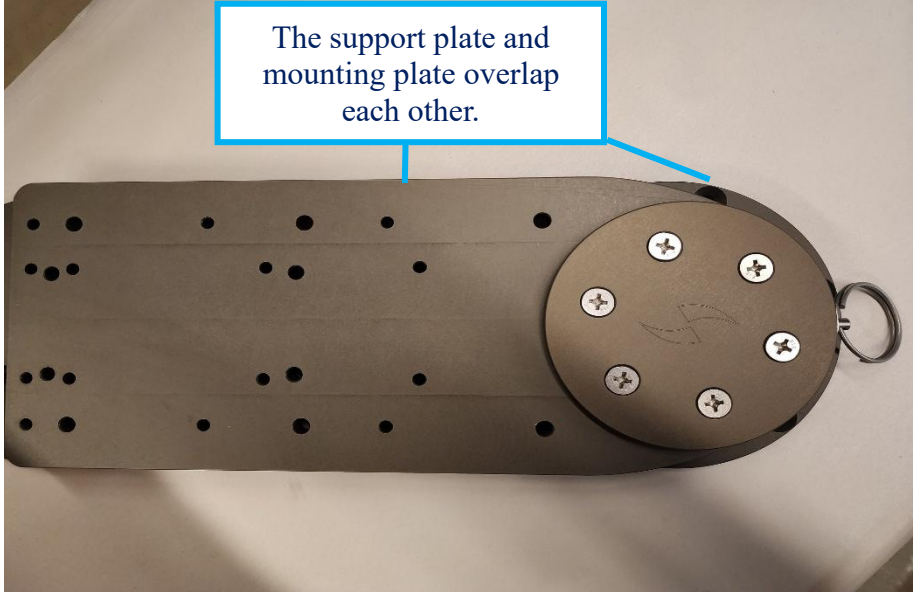
Representative Claim Chart for U.S. Pat. No. 12,258,111

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

12,258,111	Infringing Product 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> 

	<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>[1a] 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>[1b] 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> 

	<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>[1c] 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>[1d] 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>

	
<p>[1e] 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 [1d] analysis, the SS Rotating Mount features a support plate and elongated mounting plate which overlap each other.</p> 
<p>[1f] 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>

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.



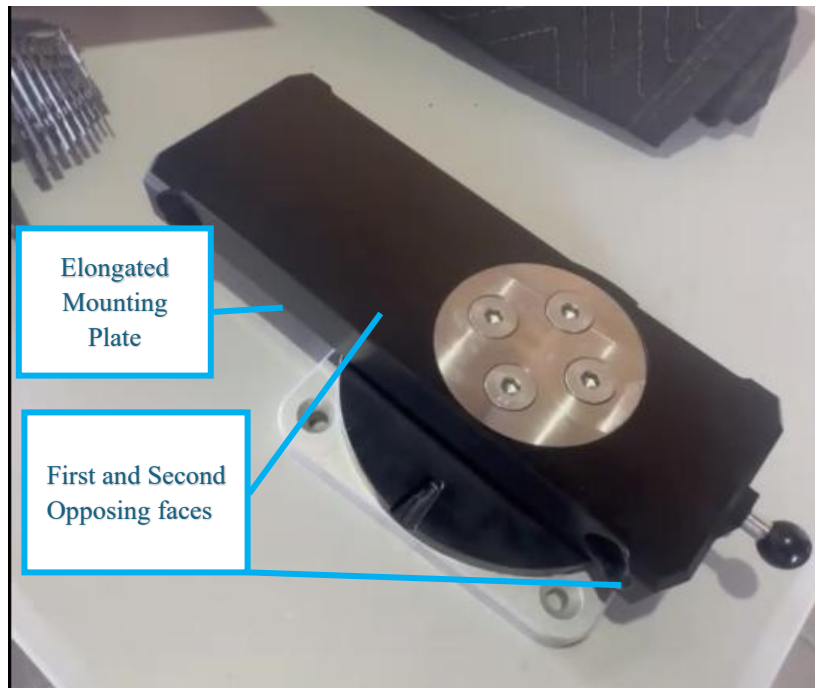
Representative Claim Chart for U.S. Pat. No. 12,258,111

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

12,258,111	Infringing Product SRQ Rhodan Mount (the “SRQ Mount”)
Claim 1	
A swivel mount, comprising:	<p>As shown in the picture below the infringing SRQ Mount is a swivel mount.</p> 

[1a] An Elongated Mounting Plate comprising first and second opposing faces spaced apart by one or more peripheral sidewalls;

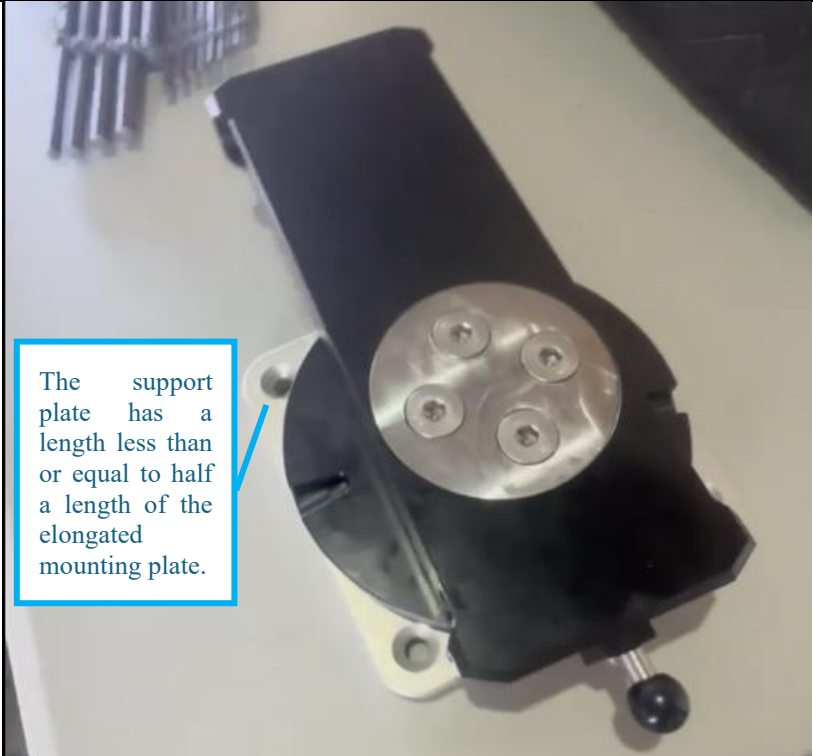
As shown in the picture below the SRQ Mount features a long rectangular plate along with a top face and bottom face that are spaced by rotating locking flange.

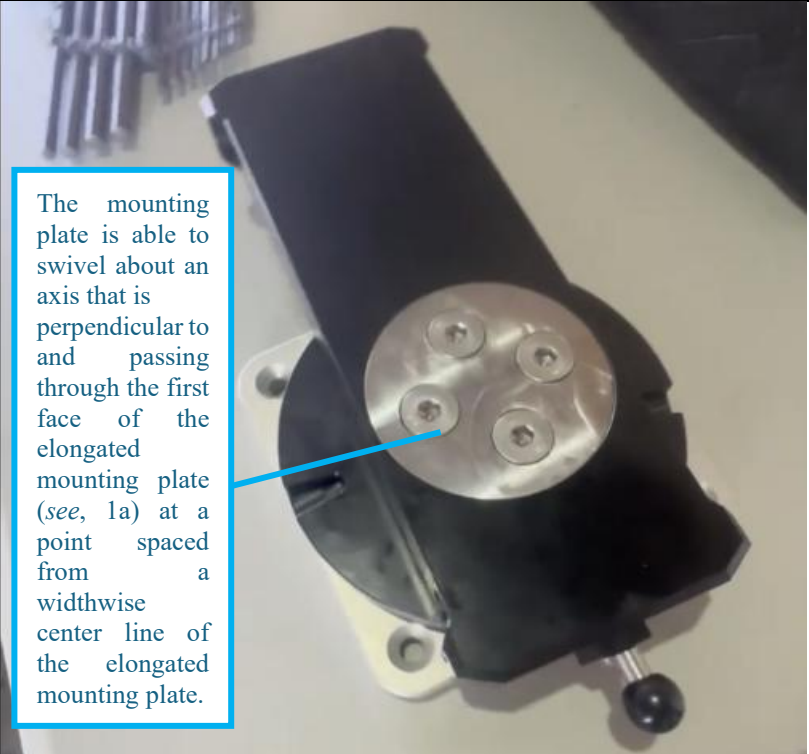
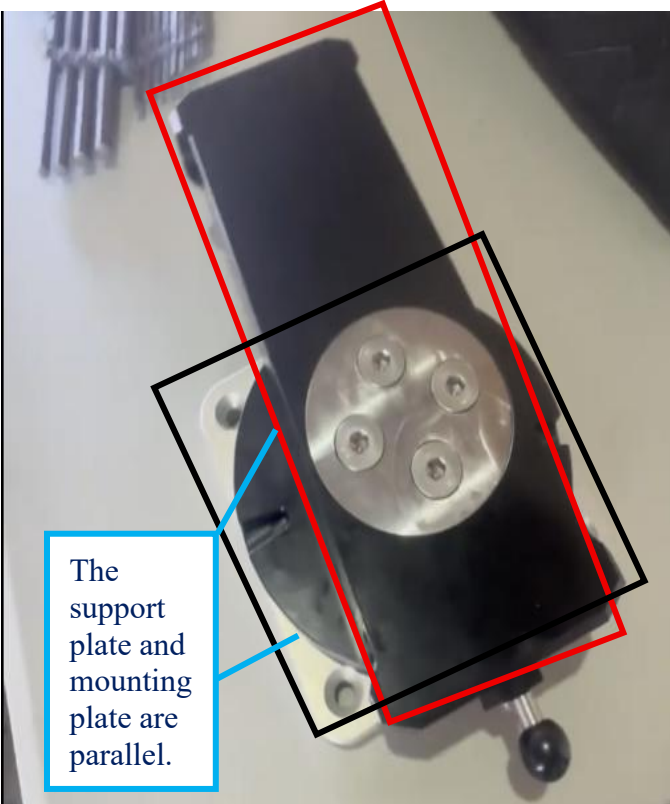


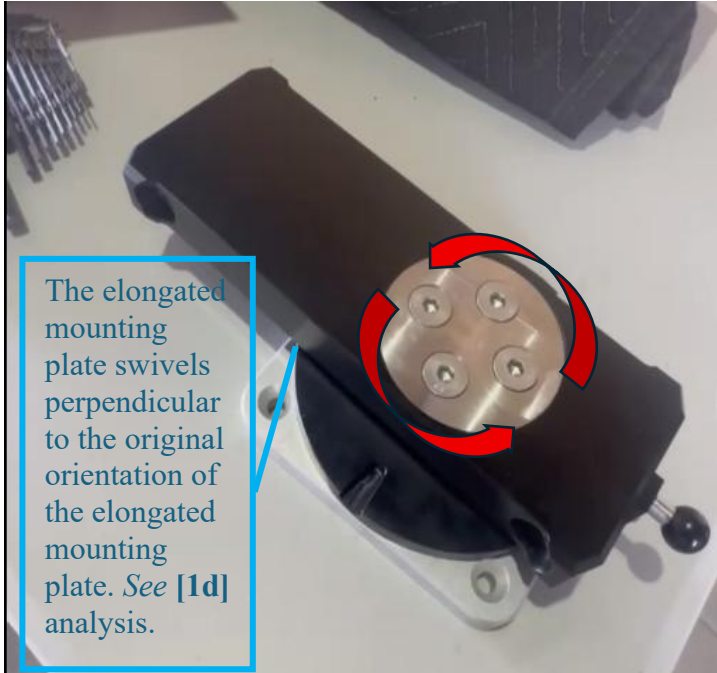
The long rectangle plate is covered by the '111 patent as the elongated mounting plate because it has opposing faces (the top and bottom face) that are separated by multiple peripheral sidewalls.

[1b] 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

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>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>[1c] 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>

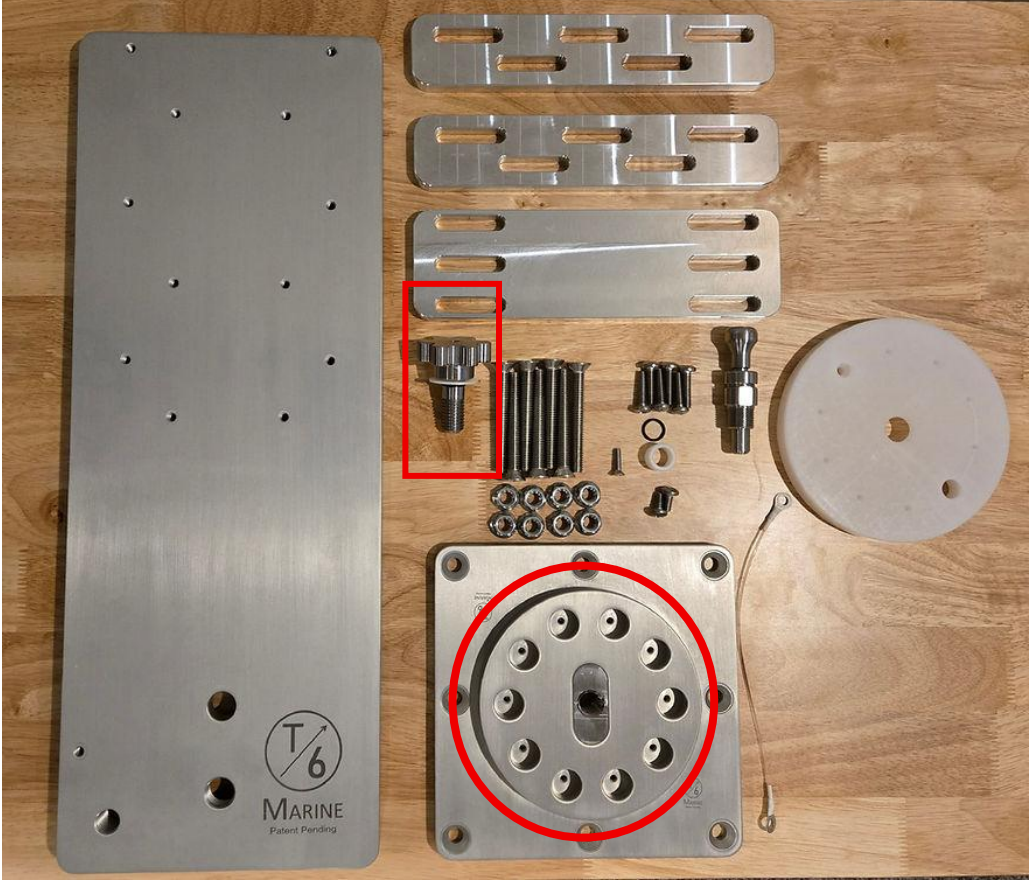
	 <p>The mounting plate is able to swivel about an axis that is perpendicular to and passing through the first face of the elongated mounting plate (see, 1a) at a point spaced from a widthwise center line of the elongated mounting plate.</p>
<p>[1d] the first faces of the support plate and the elongated '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>

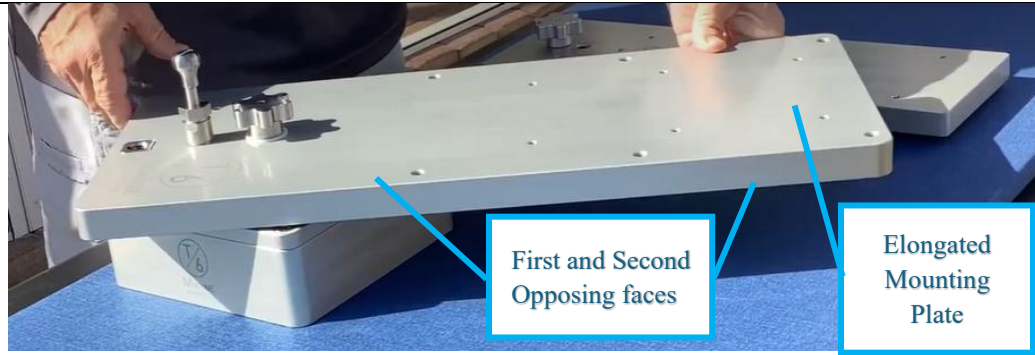
<p>[1e] the swivel element, the support plate, and the elongated 'mounting plate at least partially overlap each other; and</p>	<p>As shown in the picture below and in the [1d] analysis, the SRQ Mount features a support plate and elongated mounting plate which overlap each other.</p> 
<p>[1f] the swivel 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 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> 

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

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

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

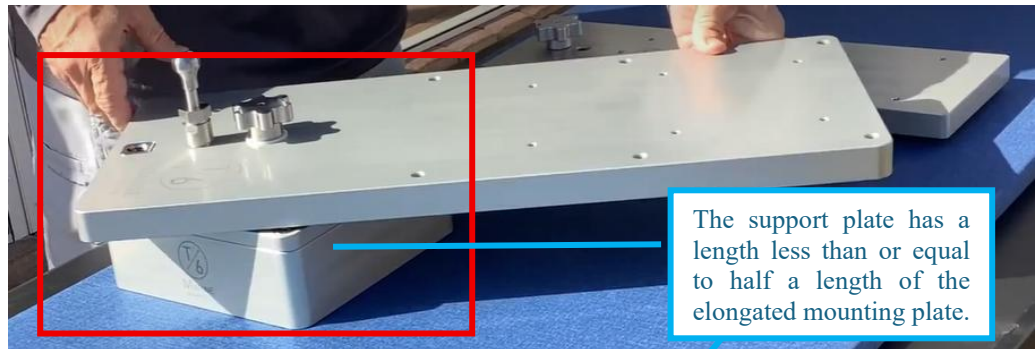
	 <p>The image above suggests that the mount does allow for the plate to swivel about an axis, making the Boss 360 Mount a swivel mount. Additionally, T6 Marine's website describes it as "the BOSS 360 at T/6 Marine, the ultimate 360 rotating quick release trolling motor mount designed for precision and convenience."</p>
<p>[1a] 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> 

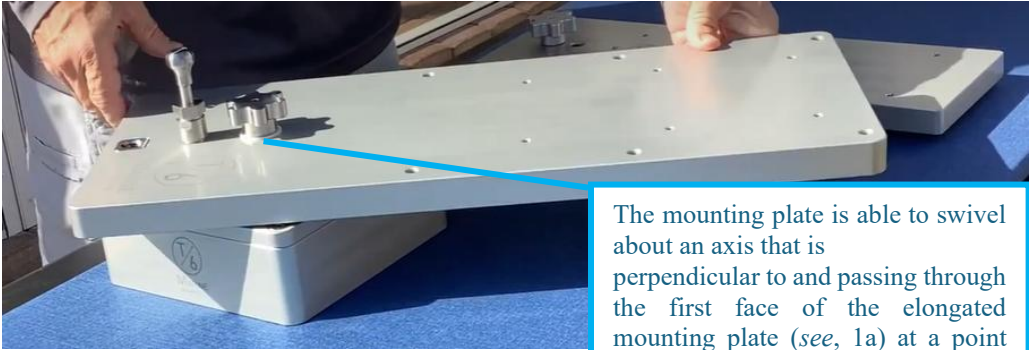


The long rectangle plate is covered by the '111 patent as the elongated mounting plate because it has opposing faces (the top and bottom face) that are separated by multiple peripheral sidewalls.

[1b] 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

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>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>[1c] 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="407 558 1430 905">  <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 (<i>see</i>, 1a) at a point spaced from a widthwise center line of the elongated mounting plate.</p> </div> <div data-bbox="407 1050 963 1623">  <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>

<p>[1d] 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 plates are parallel to the support plate above (the gunnel) as claimed in the patent.</p>   <p><i>(shown above)</i> showing the elongated mounting plate which is clearly parallel to the support plate.</p>
<p>[1e] 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>

	
<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>

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO. 25-CCV-23581-RKA

SEA SWIVEL INC, a Florida Corporation,

Plaintiff,

v.

RHODAN MARINE SYSTEMS OF
FLORIDA, LLC, et al.,

Defendants.

**DECLARATION OF HORACIO LONGORIA IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY INJUNCTION AGAINST SHUTTLESLIDE**

I, Horacio Longoria, hereby declare as follows:

1. I am over the age of 18 and fully competent to make this affidavit. I have personal knowledge of the matters stated within this declaration and if called and sworn as a witness, I could and would competently testify thereto, under oath.

2. This affidavit is based upon my personal knowledge of the facts stated herein in the regular course of business.

3. I am the owner of Billet Industries, Inc. ("Billet Industries") located at 6700 Silacci Way, Gilroy, CA 95020.

4. Billet Industries has designed and produced numerous other high-quality parts for the marine industry, the aerospace field, and medical and mechanical professionals nationwide, including the Sea Swivel.

5. As of July 2023, Billet Industries remains the developer and manufacturer of the Sea Swivel trolling motor mount.

6. As part of Billet Industries' marketing practices and business development, it

attends several trade shows including marine focused trade shows.

7. Billet Industries recently attended IBEX—International BoatBuilders’ Exhibition & Conference (“IBEX”) held in Tampa, Florida from October 7-9, 2025.

8. Billet Industries was assigned a booth at IBEX. In the booth, we displayed among other products, a Sea Swivel trolling motor mount.

9. On October 7, 2025, while I was stationed at the Billet Industries booth alongside Zach Putzig (“Zach”), an employee of Billet Industries, we were approached by a gentleman wearing a polo shirt embroidered with the Shuttleslide brand. Subsequent research identified the individual as Russell Taylor (“Mr. Taylor”), the owner of Shuttleslide.

10. On October 7, 2025, Mr. Taylor approached and entered the Billet Industries booth on two (2) occasions.

11. On the first occasion, Mr. Taylor directed a series of questions to my employee, Zach, concerning the Sea Swivel. These included inquiries regarding the entity responsible for machining the Sea Swivel, the locations of the machining company, the source of the pull pin mechanism, and whether Billet Industries performs all machining for the product. Aware that Mr. Taylor could have an affiliation with Shuttleslide, Zach responded courteously but refrained from providing specific information, as he deemed the questions to be inappropriate.

12. On the second occasion, Mr. Taylor visited the Billet Industries booth, at which point I introduced myself. He proceeded to ask specific questions regarding the various materials, manufacturing methods, and finishing processes used for the Sea Swivel, with particular attention to its anodizing. Mr. Taylor also inquired whether the described anodizing process could in fact produce the color observed on the Sea Swivel. I responded as courteously as possible, confirming that we stand by the claims presented on our website.

13. As the manufacturer of the Sea Swivel, I was mindful of the concerns raised by Mr. Taylor's questions. Nevertheless, I ensured that I did not disclose any proprietary information or trade secrets that Mr. Taylor appeared to be seeking.

14. That same day, I contacted Mark Berta ("Mr. Berta"), the owner of Sea Swivel and I provided a detailed account of what had occurred between myself, Zach and Mr. Taylor.

15. Mr. Berta voiced his concerns with anyone seeking proprietary information, but especially a competitor that I recently learned has been accused of infringing upon the Sea Swivel.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 14, 2025.

Horacio Longoria

HORACIO LONGORIA