

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

THE RIDGE WALLET LLC,

Plaintiff,

v.

BEMMO INC.,

Defendant.

Case No. 1:23-cv-2091

**ORIGINAL COMPLAINT FOR PATENT
INFRINGEMENT AND TRADE DRESS
INFRINGEMENT**

DEMAND FOR JURY TRIAL

EXHIBITS

Exhibit No.	Designation	Description
1	Public	GQ Article featuring Ridge
2	Public	Regular Wallet vs. Ridge Wallet Image
3	Public	Generic Ridge Wallet Twitter Post
4	Public	Walletopia Article Comparing Ridge and Knockoffs
5	Public	Ridge's " <i>Forged Ember</i> " Wallet
6	Public	" <i>Forged Ember</i> " Trade Dress Examples
7	Public	Ridge " <i>Forged Ember</i> " Wallet Review
8	Public	Ridge's " <i>Forged Ember</i> " Authorized Merchandise
9	Public	U.S. Patent No. 10,791,808
10	Public	U.S. Patent No. 10,791,808 Assignment
11	Public	Bemmo Slim Wallets on Whiz Cart
12	Public	Bemmo Slim Wallets on Supply Leader
13	Public	Bemmo Slim Wallets on Amazon
14	Private	Bemmo's Letter Dated January 27, 2023
15	Private	Ridge's Cease and Desist Letter Dated February 6, 2023
16	Private	Infringement Claim Chart
17	Public	Bemmo Wallet Instructions
18	Public	Ridge's Virtual Patent Marking
19	Public	Bemmo " <i>Forged Carbon Red</i> " Wallet on Amazon

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff The Ridge Wallet, LLC (“Ridge” or “Plaintiff”) files this complaint for patent infringement against Bemmo Inc. (“Bemmo” or “Defendant”) alleging, based on its own knowledge as to itself and its own actions, and based on information and belief as to all other matters, as follows:

NATURE OF THE ACTION

1. This is a civil action arising under the patent laws of the United States, 35 U.S.C. § 1 *et seq.*, including specifically 35 U.S.C. § 271, based on Bemmo’s willful infringement of at least Claims 1 and 14 of U.S. Patent No. 10,791,808 (the “’808 Patent”).

2. This civil action also arises under the United States Lanham Act, 15 U.S.C. § 1051 *et seq.*, based on Bemmo’s willful infringement of Ridge’s “*Forged Ember*” trade dress, pending Application Serial No. 97/447,035.

THE PARTIES

3. Ridge is a corporation existing under the laws of the State of Delaware having its principal place of business located at 2448 Main St, Santa Monica, California, 90405, United States.

4. On information and belief, Bemmo is a New York corporation having its principal place of business located at 1042 50th Street, Apartment B9, Brooklyn, New York 11219, United States.

JURISDICTION AND VENUE

5. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a) because the claims herein arise under the patent laws of the United States, 35 U.S.C. § 1 *et seq.*, including 35 U.S.C. § 271, and the United States Lanham Act, 15 U.S.C. § 1051 *et seq.*

6. This Court has personal jurisdiction over Bemmo in this action because Bemmo has committed acts of infringement within the State of New York and within this District through, for example, the sale of the Bemmo Slim Wallet online in this District.

7. Bemmo regularly transacts business in the State of New York and within this District.

8. Bemmo engages in other persistent courses of conduct and derives substantial revenue from products and/or services provided in the Eastern District of New York, and has purposefully established substantial, systematic, and continuous contacts within this District. Bemmo should thus reasonably expect to be sued in a court in this District.

9. Bemmo continues to grow its presence in this District, further cementing its ties to this District. For example, Bemmo operates seller accounts on various websites, such as Ubuy.co, Supply Leader, Whizz Cart, and Home Furniture Life, to continue to try to sell products similar to those sold by Ridge and infringing Ridge's '808 Patent.

10. The Court's exercise of jurisdiction over Bemmo will not offend traditional notions of fair play and substantial justice.

11. Venue in the Eastern District of New York is proper pursuant to 28 U.S.C. §§ 1391(b), (c) and 1400(b).

12. Bemmo has committed acts of infringement within this judicial district, giving rise to this action.

13. Bemmo continues to conduct business in this judicial district, including one or more acts of making, selling, using, importing, and/or offering for sale infringing products or providing support services to Bemmo's customers in this District.

RIDGE'S LEGACY OF INNOVATION

14. Ridge is the owner of U.S. Patent No. 10,791,808 and the owner of common law trade dress styled as a forged carbon surface speckled with the color red and characterized by the term “*Forged Ember*.”

15. Ridge is an innovative and revolutionary consumer goods company that has changed the industry with regard to several categories of products. One such category that Ridge has revolutionized is the category of compact wallets.

16. Ridge was formed with the simple belief that the company could make wallets better. Prior to Ridge revolutionizing the industry, wallets were designed to hold everything from gift cards and credit cards to receipts and coins.

17. Ridge turned that approach on its head with its minimalist-first design approach.

18. After two Kickstarter campaigns, nine years of research and development in the United States, and over two million wallets sold, Ridge continues to start every day with that same mentality: to improve the items customers carry every day. Ridge’s continued success in introducing successful, carryable products is evidence of its innovative approach and business acumen.

19. Today, the Ridge Wallet is one of the most distinct and recognizable wallets on the market.

“Slim yet expandable,
low profile, but
fully featured.”

GQ

INVERSE <small>“A truly durable smart wallet, this one is made from military-grade aluminum that can block RFID scans and comes with a lifetime warranty.”</small>	Popular Mechanics <small>“The Ridge Slim Wallet is built to last a lifetime, but if it doesn’t, its lifetime warranty ensures you’ll get another one ASAP.”</small>	GEAR PATROL <small>“For the sheer size of this thing alone, I’d say the wallet’s worth it.”</small>
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Exhibit 1.

20. It all started when inventor Daniel Kane had an idea for a wallet that is sleeker and smaller than a traditional tri-fold or bi-fold wallet.



Exhibit 2.

21. Sitting at his home in California, Mr. Kane came up with a design for a card-shaped wallet to hold not only cards (credit cards, identification cards, and the like) but also to hold cash. Its exterior was metal and included a money clip. It included two multi-piece metal panels that were initially held together with rivets. The two panels were urged toward one another with an elastic band. In fact, Mr. Kane’s mother sewed the very first set of elastic bands, and a Simi Valley, California metalworker, crafted the metal components that were used in those first wallets, including the rivets used to fix the plates together. Mr. Kane made the interior plates of the original

prototypes by modifying plastic gift cards glued together and removing excess plastic to make the inner track for the elastic bands. The metalworker then re-created those plastic interior plates in metal to create the first metal prototypes.

22. As interest in Ridge’s innovative product grew, and sales and revenue reflected this growth, Ridge began offering different iterations of the same wallet to address differences in consumers’ style preferences.

23. Ridge’s innovative, dual track, metal design has become synonymous with the brand itself, leading consumers to refer to knockoffs as “generic ridge wallets.” See, for example:

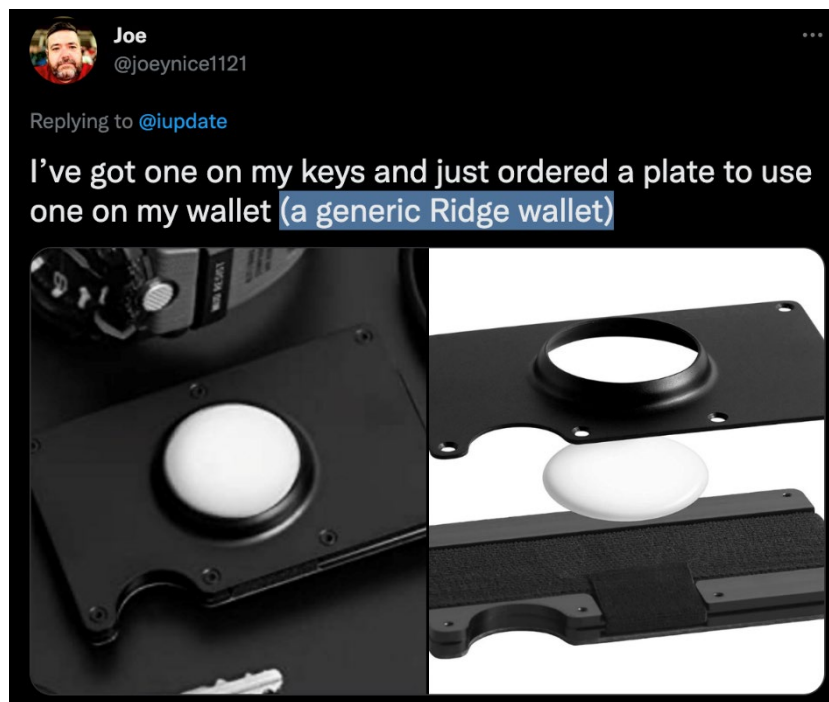


Exhibit 3.

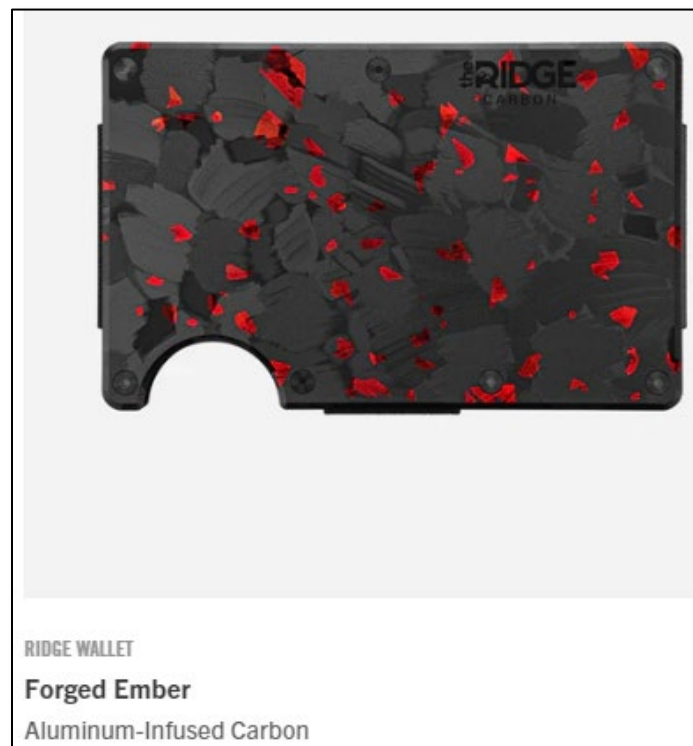
24. In fact, Walletoxia put together an article evaluating “the top 6 Ridge knock off wallets from Amazon and compar[ing] them to the original ridge Carbon Fiber and Ridge Aluminum. It’s the Ridge vs knockoff to see if it makes sense to try before you buy a Ridge

Wallet.” Exhibit 4. In the article, Walletoxia acknowledges that other sellers are clearly “Ridge knockoffs.” See, for example:

We have all seen the advertising for [Ridge Wallets](#) and all that they have done. They are everywhere and their design set the pace for a wallet that works well for a sandwich-type design. That said, we know every wallet has knockoffs.

Id.

25. In February of 2021, Ridge first offered for sale its domestic industry product embodying the Ridge Forged Ember Trade Dress. *See, e.g.*, Exhibit 5.



26. Further representative examples of the Ridge Forged Ember Trade Dress are attached as Exhibit 6.

27. Through nearly two years of sales, together with extensive advertising and promotion (and accordingly significant investment in both), Ridge successfully developed strong consumer recognition for the iconic trade dress of Forged Ember.

28. The Ridge Forged Ember Trade Dress resonates in the mind of consumers on an ongoing basis, due to its fame and Ridge's continued use and promotion of the trade dress through ongoing sales, marketing, and promotion.

29. Many reviewers of The Ridge Wallet simply refer to the wallet as "The Ridge Forged Ember Wallet." In one instance, the Ridge Wallet Forged Ember Trade Dress was described as "unforgettable." *See* Exhibit 7:

Ridge Forged Ember Wallet Review

The Ridge Forged Ember is a minimalist, RFID-blocking wallet. This wallet has an unforgettable look and a practical, compact design. Also, it has an expandable elastic that will allow you to carry up to 12 cards inside the cardholder. The Ridge Forged Ember wallet will maintain its slim profile, even if you fill it with cash and cards. This minimalist wallet is modern, functional, and will hold all of your essentials.

Id.

30. Building on the success of The Ridge Wallet, Ridge continues to use and promote the Ridge Forged Ember Trade Dress on a variety of merchandise and products available through its own website and through third party retailers through its wholesale program. Over the last four years, Ridge has sold millions of dollars' worth of products that display Ridge's Trade Dress and products that embody the '808 Patent. Representative examples of Ridge's authorized merchandise are attached as Exhibit 8.

31. Because of their exclusive and continuous longstanding use, the Ridge Forged Ember Trade Dress identifies Ridge’s wallets and function as a direct link to the history of the Ridge Wallet, conveying to the public that a wallet bearing the Ridge Forged Ember Trade Dress is the reliable “original.” Further, because of the exclusive and continuous use and extensive sales and marketing of the Ridge Forged Ember Trade Dress in connection with Ridge’s wallets, the Ridge Forged Ember Trade Dress have become distinctive, associated exclusively with Ridge, and indeed famous among the general consuming public in the United States. The Ridge Forged Ember Trade Dress is thus of tremendous value to Ridge, immediately communicating a host of positive attributes associated with Ridge’s wallets.

32. Ridge brings the instant lawsuit because Bemmo is unlawfully infringing Ridge’s intellectual property—intellectual property that is a direct result of Ridge’s innovation and ingenuity.

33. Without Ridge’s intellectual property and embodying products, Bemmo would not exist. Bemmo and others are reaping enormous benefits from Ridge’s vision and its decade-long commitment thereto.

THE ASSERTED INTELLECTUAL PROPERTY

A. The ’808 Patent

34. Ridge’s commitment to innovation includes prosecuting and filing patent applications, including, but not limited to, the ’808 Patent.

35. Ridge owns, by assignment, all right, title, and interest in the ’808 Patent.

36. The '808 Patent, titled "Compact Wallet," was issued on October 6, 2020 and names Daniel Kane as the single inventor. The '808 Patent was issued from U.S. Patent Application No. 15/421,596, filed on February 1, 2017.

37. A true and accurate copy of the '808 Patent is attached hereto as Exhibit 9. A true and accurate copy of the assignment from the named inventor to Ridge is attached hereto as Exhibit 10.

B. The Ridge Wallet's Trade Dress

38. Ridge owns rights and protectable interests in the Ridge Forged Ember Trade Dress. Ridge Wallets have certain key design features that constitute the Ridge Forged Ember Trade Dress and that distinguish them from other commercially available wallets. The Ridge Forged Ember Trade Dress consists of the overall exterior appearance and styling of the wallet design, including a carbon fiber wallet with red speckling for which Ridge uses the term "*Forged Ember*."

39. The Ridge Forged Ember Trade Dress is distinctive and has acquired secondary meaning through, *inter alia*, years of use, extensive sales, advertising and promotion, awards, and unsolicited media attention. Based on exclusivity after first launch of The Ridge Wallet in the United States, the extensive marketing, and the resultant voluminous sales and industry recognition of The Ridge Wallet, the Ridge Forged Ember Trade Dress has acquired secondary meaning and distinctiveness, and has become famous among consumers. Consumers have come to rely upon the appearance of the Ridge Forged Ember Trade Dress as an indicator of the source and quality of the product.

40. By way of example, Forged Ember queries simply did not exist before the launch of the Ridge Forged Ember Wallet in 2021, and now result in tens of thousands of queries a year. Not to mention, many reviewers of the Ridge Wallet simply refer to the wallet as "The Ridge

Forged Ember Wallet.” *See* Exhibit 7. In one instance, the Ridge Wallet Forged Ember Trade Dress was described as “truly unique” and “memorable.” *See id.*

41. The increasing sales of the Forged Ember Ridge Wallets evidence the goodwill built into this trade dress that continue to carry Ridge to greater heights.

42. The Ridge Forged Ember Trade Dress is non-functional in its entirety, visually distinctive, and unique in the wallet industry. Numerous other non-infringing, non-dilutive designs are available that are equally feasible and efficient, none of which necessitate copying the Ridge Forged Ember Trade Dress. Indeed, multiple other wallet manufacturers compete successfully without copying the unique Ridge Forged Ember Trade Dress.

BEMMO’S RECENT FORAY INTO THE “COMPACT WALLET” SPACE WITH THE ACCUSED PRODUCTS

43. On information and belief, Bemmo entered the compact wallet market with the sale of its “Slim Wallets” in 2021.

44. Bemmo offers for sale various iterations of its wallets in different colors, including the “Slim Minimalist Credit Card Wallet with Money Clip” and the “Bemmo Carbon Fiber Card Holder Wallet with Money Clip,” among other products (collectively, the “Slim Wallets” or “Accused Products”).

45. Bemmo contends its Slim Wallets are “super sleek and stylish but also very functional” with a “lightweight,” design that “will hold up to 10 cards and...1-10 bills comfortably.” *See* Exhibit 11.

46. According to Bemmo’s product description, the Slim Wallet “neatly tucks away in your pocket” with “no bulge” and is offered in carbon fiber and aluminum. *See id.* It is also equipped with a “C-shape cut out for quick, easy access.” *See id.*

47. Upon information and belief, Bemmo offers for sale its Slim Wallets on third party websites, including, but not limited to, WhizzCart and Supply Leader, and Amazon.com. *See, e.g.*, Exhibits 11, 12, 13.

48. Bemmo has made, used, offered for sale, and sold, and continues to make, use, offer for sale, and sell, Slim Wallets, including but not limited to the Slim Wallets identified above. *See* Exhibits 11, 12, 13.

49. Upon information and belief, Bemmo has imported, and continues to import, Slim Wallets, including but not limited to the Slim Wallets identified above. *See* Exhibits 11, 12, 13.

BEMMO’S KNOWLEDGE OF RIDGE’S INFRINGEMENT
ALLEGATIONS OF THE ’808 PATENT

50. On January 10, 2023 and January 21, 2023, Ridge filed Amazon takedown requests asserting that Bemmo’s Slim Wallets infringed the ’808 Patent.

51. In response to Ridge’s Amazon takedown request, Bemmo sent Ridge a letter (“Bemmo’s Letter”) on January 27, 2023, demanding “a prompt retraction of the complaints” filed with Amazon. Exhibit 14.

52. On February 6, 2023, Ridge responded to Bemmo’s Letter with its own Cease and Desist letter (“Cease and Desist Letter”), specifically charging it with infringement of at least the ’808 Patent for a third time. Exhibit 15.

53. In addition to charging Bemmo with infringement of the ’808 Patent, Ridge’s Cease and Desist Letter explicitly included a reservation of rights putting Bemmo on notice of Ridge’s pending patent applications:

Title	Serial No.	Filing Date
Compact Wallet	18/076,188	12/6/2022
Wallet	29/813,524	10/29/2021
Wallet	29/812,250	10/20/2021
Wallet	29/813,614	10/29/2021
Wallet	29/813,617	10/29/2021

Wallet Portion	29/822,078	1/5/2022
Clip	29/882,878	1/19/2023

Id.

54. Ridge’s Cease and Desist Letter further demanded that Bemmo cease and desist from selling its infringing products in the United States by no later than February 16, 2023. *Id.*

55. Bemmo has neither taken a license to the ’808 Patent, nor engaged Ridge in discussions of acquiring such a license.

56. On information and belief, Bemmo has not altered the functionality of any of its products to avoid infringement of the ’808 Patent.

COUNT I

(Infringement of the ’808 Patent)

57. Ridge incorporates by reference and re-alleges each and every allegation of Paragraphs 1 through 56 as set forth herein.

58. Ridge owns all substantial rights, interest, and title in and to the ’808 Patent, including the sole and exclusive right to prosecute this action and enforce the ’808 Patent against infringers, and to collect damages and secure and enforce injunctive relief, for all relevant times.

59. The ’808 Patent generally describes a sleek card and money-carrying device, such as a compact wallet, that is capable of blocking radio frequency identification (“RFID”). In particular, the claimed invention “is a compact wallet designed to present a minimal silhouette in a shirt, pants, or purse pocket. Novel features hold the silhouette to the minimal dimensions of a credit card while affording maximal expandability for content storage and accessibility.” Exhibit 9, at Abstract. The Ridge Wallet comprises two multi-piece panels held together with rivets where the two panels are connected and urged toward one another with an elastic band. The compact wallet can be assembled with a money clip or an elastic and plastic cash strap.

60. The written description of the '808 Patent describes in technical detail each of the claims limitations, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations are patentably distinct from and improved upon what may have been considered conventional or generic in the art at the time of the invention. *See* Exhibit 9.

61. The '808 Patent claims are directed to patent eligible subject matter in the form of “machines” – “compact wallet[s]” – and thus satisfy 35 U.S.C. § 101.

62. Bemmo has made, had made, used, imported, supplied, distributed, sold, and/or offered for sale the Accused Products, including its Slim Wallets. *See, e.g.*, Exhibits 11, 12, 13.

63. As set forth in the attached non-limiting Claim chart (Exhibit 16), Bemmo has infringed and is infringing at least Claims 1 and 14 of the '808 Patent by making, having made, using, importing, supplying, distributing, selling, and/or offering for sale the Accused Products.

64. Bemmo actively induces infringement of at least Claims 1 and 14 of the '808 Patent by selling the Accused Products in such a way that users are instructed to make and/or use a wallet that infringes the '808 Patent. *See*, for example, Exhibit 17, describing how to push cards out of the wallet for easy access. Bemmo aids, instructs, or otherwise acts with the intent to cause an end user to use the Accused Products. Bemmo knew of the '808 Patent at least as early as January 10, 2023, and knew that its subsequent making, using, selling, offering for sale, and/or importation would cause purchasers to directly infringe at least Claims 1 and 14 of the '808 Patent. *See* Exhibits 14, 15.

65. Bemmo is also liable for contributory infringement of at least Claims 1 and 14 of the '808 Patent by providing, and by having knowingly provided, a material part of the instrumentalities, namely the Accused Products, used to infringe Claims 1 and 14 of the '808

Patent. The Accused Products have no substantial non-infringing uses. When an end user uses the Accused Products, for example, a Bemmo Slim Wallet, the end user directly infringes Claims 1 and 14 of the '808 Patent. Bemmo knew of the '808 Patent at least as early as January 10, 2023 and knew that its subsequent making, using, selling, offering for sale, and/or importation would cause purchasers to directly infringe at least Claims 1 and 14 of the '808 Patent. *See* Exhibits 14, 15. For at least the reasons set forth above, Bemmo contributes to the infringement of the '808 Patent by others.

66. Ridge has been damaged as a result of Bemmo's infringing conduct alleged above. Thus, Bemmo is liable to Ridge in an amount that compensates it for such infringement, which by law cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

67. Bemmo's infringement of the '808 Patent has caused, and will continue to cause, Ridge to suffer substantial and irreparable harm.

68. Bemmo has been aware of Ridge's belief that Bemmo infringes the '808 Patent since at least January 10, 2023. *See* Exhibits 14, 15.

69. Bemmo's infringement of the '808 Patent is, has been, and continues to be, willful, intentional, deliberate, and/or in conscious disregard of Ridge's rights under the '808 Patent.

70. Ridge has complied with 35 U.S.C. § 287 with respect to the '808 Patent at least by virtually marking its patented products on its website. *See* Exhibit 18.

COUNT II

(Trade Dress Infringement)

71. Ridge owns all right, title, and interest in the Ridge Forged Ember Trade Dress and has standing to bring an action for trade dress infringement under the United States Lanham Act,

15 U.S.C. § 1051 *et seq.* and common law.

72. Ridge’s Trade Dress is non-functional, visually distinctive, and unique in the wallet industry.

73. For years, the Ridge Forged Ember Trade Dress has been (and continues to be) recognized by consumers as a source identifier for The Ridge Wallet.



Exhibit 5.

74. Bemmo has offered for sale and, upon information and belief, is selling a wallet offered in “Forged Carbon Red” that infringes Ridge’s Trade Dress. *See, e.g.*, Exhibit 19.

75. Bemmo’s infringement is illustrated in the representative example below:



Id.

76. Bemmo's unauthorized use of the Ridge Forged Ember Trade Dress and confusingly similar imitations thereof in connection with the Accused Products is likely to cause confusion and mistake and deceive potential consumers and the public as to the source, origin, sponsorship or approval of Bemmo's non-Ridge brand wallet or as to affiliation, connection, or association between Bemmo or their wallets and Ridge or its wallets.

77. On information and belief, Bemmo likely intended to create associations with Ridge and to free ride on Ridge's goodwill, given that Ridge is the leader in the compact wallet market and is seeking success with respect to its Forged Ember Wallets. Given that Ridge was first to sell an '808 Patent-practicing compact wallet and subsequently a Forged Ember Wallet, the overwhelming similarities are due to Bemmo's intentional copying.

78. Further, on information and belief, consumers of wallet like those at issue here, are unlikely to exercise great care in resolving any confusion in their initial product interest, at the point of purchase, or in post-sale exposure. Even more sophisticated customers are likely to experience cognitive dissonance regarding the source, affiliation, sponsorship, or association of

the Bemmo Accused Products when confronted with promotions and sales of Bemmo Accused Products.

79. In the post-sale context, where actual or potential consumers of compact wallets may only see Bemmo's Accused Products in someone's pocket or hand in passing, consumers are also likely to mistake the source, affiliation, or sponsorship of Bemmo with Ridge and/or the asserted Forged Ember Trade Dress.

80. Due to the overwhelming similarities of Bemmo's "Forged Red" wallet, there is an undeniable likelihood of confusion between Ridge Wallets bearing the Forged Ember Trade Dress and Bemmo's Accused Products bearing the same. These similarities will continue to cause deterioration of Ridge's goodwill, which is paramount to Ridge's success, especially in view of the increasing number of knockoff Ridge wallets (and in particular those bearing the Ridge Forged Ember Trade Dress) in the market.

81. Upon information and belief, Bemmo's infringement is willful in that Bemmo knows that it does not have the right to use the Ridge Forged Ember Trade Dress in the United States. Bemmo is further capitalizing on the goodwill and reputation associated with the Ridge Forged Ember Trade Dress.

82. Bemmo's actions constitute trade dress infringement in violation of Section 43 of the Lanham Act, 15 U.S.C. § 1125(a) *et seq.*

83. Bemmo's unauthorized use of the Ridge Forged Ember Trade Dress has caused and, unless stopped, will continue to cause great and irreparable substantial injury to Ridge, the Ridge's brand, the Ridge Forged Ember Trade Dress, and to the business and goodwill represented and protected by them.

JURY DEMAND

Ridge hereby requests a trial by jury on all issues so triable by right.

PRAYER FOR RELIEF

WHEREFORE, Ridge requests that:

A. The Court find that Bemmo has directly infringed the '808 Patent and hold Bemmo liable for such infringement;

B. The Court find that Bemmo has indirectly infringed the '808 Patent by inducing its customers to directly infringe the '808 Patent and hold Bemmo liable for such infringement;

C. The Court find that Bemmo has indirectly infringed the '808 Patent by contributing to Bemmo's customers' direct infringement of the '808 Patent and hold Bemmo liable for such infringement;

D. The Court preliminarily and permanently enjoin Bemmo from further infringement of the '808 Patent;

E. The Court award damages pursuant to 35 U.S.C. § 284 adequate to compensate Ridge for Bemmo's past infringement of the '808 Patent (and to the extent not otherwise awarded an injunction, present and ongoing damages), including both pre- and post-judgment interest and costs as fixed by the Court;

F. The Court increase the damages to be awarded to Ridge for patent infringement by three times the amount found by the jury or assessed by the Court;

G. The Court declare that this is an exceptional case entitling Ridge to its reasonable attorneys' fees under 35 U.S.C. § 285;

H. The Court find that Bemmos has infringed Ridge's trade dress in violation of Section 43 of the Lanham Act, 15 U.S.C. § 1125(a) *et seq.* and hold Bemmo liable for such infringement;

I. The Court preliminarily and permanently enjoin Bemmo from further infringement of Ridge’s “Forged Ember” trade dress;

J. The Court award damages adequate to compensate Ridge for Bemmo’s past infringement of the “Forged Ember” trade dress (and to the extent not otherwise awarded an injunction, present and ongoing damages), including both pre- and post-judgment interest and costs as fixed by the Court;

K. The Court increase the damages to be awarded to Ridge for trade dress infringement by three times the amount found by the jury or assessed by the Court;

L. The Court award such other relief as the Court may deem just and proper.

Dated: March 17, 2023

Respectfully submitted,

/s/ Matthew J. Weldon

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(*pro hac vice* to be filed)

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