

**UNITED STATES DISTRICT COURT  
DISTRICT OF COLORADO**

Civil Action No.1:24-cv-2447

THE RIDGE WALLET LLC,

Plaintiff,

v.

2985, LLC D/B/A MOUNTAIN VOYAGE COMPANY,

Defendant.

---

**COMPLAINT FOR PATENT INFRINGEMENT AND JURY DEMAND**

---

Plaintiff The Ridge Wallet, LLC (“Ridge” or “Plaintiff”) files this Complaint For Patent Infringement against 2985, LLC d/b/a Mountain Voyage Co. (“Mountain Voyage” 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 Mountain Voyage’s willful infringement of U.S. Design Patent No. D1,036,246 (“246 Patent”) and U.S. Design Patent No. D1,036,852 (“852 Patent”) (collectively, the “Design Patents”).

**THE PARTIES**

2. 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.

3. On information and belief, Mountain Voyage is a Colorado corporation having its principal place of business located at 2985 Xenon Street, Wheat Ridge, Colorado 80215.

**JURISDICTION AND VENUE**

4. 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.

5. This Court has personal jurisdiction over Mountain Voyage in this action because Mountain Voyage has committed acts of infringement within the State of Colorado and within this District through, for example, the sale of the Mountain Voyage Accused Products online in this District.

6. Mountain Voyage regularly transacts business in the State of Colorado and within this District.

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

8. Mountain Voyage continues to grow its presence in this District, further cementing its ties to this District. For example, Mountain Voyage operates its own website and an Amazon.com seller's website to continue to try to sell products similar to those sold by Ridge.

9. The Court's exercise of jurisdiction over Mountain Voyage will not offend traditional notions of fair play and substantial justice.

10. Venue in the District of Colorado is proper pursuant to 28 U.S.C. §§ 1391(b), (c) and 1400(b).

11. Mountain Voyage has committed acts of willful patent infringement within this judicial district, giving rise to this action.

12. Mountain Voyage 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 service to Mountain Voyage's customers in this District.

### **RIDGE'S LEGACY OF INNOVATION**

13. 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.

14. Ridge was formed over a decade ago 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.

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

16. After two Kickstarter campaigns, a decade of research and development in the United States, and over five 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.

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



Exhibit 1.

18. 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.

19. 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 named Loren, crafted the metal components that were used in those first wallets including the rivets used to fix the plates together. The interior plates of the original prototypes were made by Mr. Kane by modifying plastic gift cards glued together and removing excess plastic to make the inner track for the elastic bands made by his mother. Those plastic

interior plates were then re-created in metal by Loren to create the first metal prototypes.

20. Ridge first began offering for sale its patent-practicing product, in mid to late 2016. 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.

21. 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:

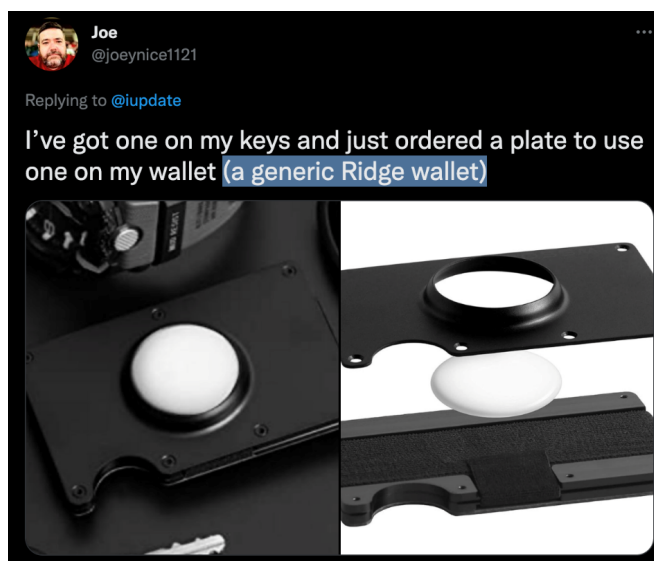


Exhibit 3.

22. In fact, Walletoptia 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 post, Walletoptia 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.

Exhibit 4.

23. Indeed, the “niche” in which Mountain Voyage sells its products on Amazon.com is called “ridge wallet for men,” reflecting the fact that Ridge created what Amazon.com now calls a “niche” for sellers to transact business.

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

25. Without Ridge’s intellectual property and embodying products, Mountain Voyage would not exist. Mountain Voyage and others are reaping enormous benefits from Ridge’s vision, and its commitment to that vision, for almost a decade.

26. Indeed, in an interview with Business Insider in March, 2023, Mountain Voyage’s founder, Joseph Reeves, told the interviewer that he “just emulated [Ridge’s] product” in starting his business. Exhibit 5.

27. Ridge put Mountain Voyage on actual, explicit notice of its infringement of the Design Patents on the day each of the Design Patents issued.

28. Mountain Voyage has not altered its design to try to avoid infringement of the Design Patents.

29. In addition to trying to emulate Ridge’s product, Mountain Voyage’s infringement of the Design Patents is, and at all times has been, willful.

### **THE DESIGN PATENTS**

30. Ridge’s commitment to innovation includes the prosecution and filing of patent applications, including, but not limited to, the Design Patents.

31. Ridge owns, by assignment, all right, title, and interest in the ‘246 Patent.

32. The ‘246 Patent is titled “Clip,” issued on July 23, 2024, and names Daniel Kane as the single inventor. The ‘246 Patent was issued from U.S. Patent Application No. 29/882,878, filed on January 19, 2023.

33. A true and accurate copy of the ‘246 Patent is attached hereto as Exhibit 6. A true and accurate copy of the assignment of the ‘246 Patent from the named inventor to Ridge is attached hereto as Exhibit 7.

34. Ridge owns, by assignment, all right, title, and interest in the ‘852 Patent.

35. The ‘852 Patent is titled “Wallet,” issued on July 30, 2024, and names Daniel Kane as the single inventor. The ‘852 Patent was issued from U.S. Patent Application No. 29/813,614, filed on October 29, 2021.

36. A true and accurate copy of the ‘852 Patent is attached hereto as Exhibit 8. A true and accurate copy of the assignment of the ‘852 Patent from the named inventor to Ridge is attached hereto as Exhibit 9.

### **MOUNTAIN VOYAGE’S RECENT FORAY INTO THE “COMPACT WALLET” SPACE WITH THE ACCUSED PRODUCTS**

37. Nearly eight years after the creation of The Ridge Wallet, LLC, Mountain Voyage entered the compact wallet market with the sale of its metal wallets with money clips.

38. According to an article written about Mountain Voyage by Business Insider, Mountain Voyage’s CEO, Joseph Reeves, “found a supplier through Alibaba who could manufacture the wallet he wanted, which, at the time, was a very similar style to a competitor

wallet, he said: ‘I just emulated their product.’” Exhibit 5.

39. Since that time, Mountain Voyage’s wallets have copied the silhouette of Ridge’s groundbreaking compact wallet product.

40. On its website, Mountain Voyage offers for sale several products that have a money clip, including a various metal wallets in a number of colors, a collection of wooden wallets, a collection of leather wallets, and a carbon fiber wallet. The money clip iterations of each of Mountain Voyage’s wallet products are collectively referred to as the “Accused Products”.

41. Mountain Voyage contends the Accused Products have “a streamlined design” that “allows you to carry only what you need.” Exhibit 10. Further, Mountain Voyage tells its customers that “This is more than just a wallet – it’s a versatile tool that can adapt to any situation. Whether you need to carry cash or cards the Mountain Voyage Co. wallet has you covered. Its modular design also allows you to customize it to your liking and add or remove features as needed.” Exhibit 10.

42. Mountain Voyage also offers for sale its Accused Products on third party websites, including, but not limited to, Amazon.com. *See, e.g.,* Exhibit 11.

43. Mountain Voyage has made, used, offered for sale, and sold, and continues to make, use, offer for sale, and sell, Accused Products, including but not limited to the Accused Products identified above. *See* Exhibit 10, Exhibit 11.

44. Upon information and belief, Mountain Voyage has imported, and continues to import, Accused Products, including but not limited to the Accused Products identified above. *See* Exhibit 10, Exhibit 11.

**MOUNTAIN VOYAGE’S KNOWLEDGE OF RIDGE’S INFRINGEMENT**  
**ALLEGATIONS OF THE DESIGN PATENTS**

45. On July 23, 2024, the day the ‘246 Patent issued, Ridge sent an email to Mountain



Voyage’s General Counsel asserting infringement of the ‘246 Patent. Exhibit 12. In that email, Ridge included a chart comparing the ‘246 Patent with the design of Mountain Voyage’s Accused Products.

46. Mountain Voyage acknowledged receipt of that email by responsive email on August 2, 2024. Exhibit 13.

47. On July 30, 2024, the day the ‘852 Patent issued, Ridge sent an email to Mountain Voyage’s General Counsel asserting infringement of the ‘852 Patent. Exhibit 14. In that email, Ridge include a chart comparing the ‘852 Patent with the design of Mountain Voyage’s Accused Products.

48. Mountain Voyage acknowledged receipt of that email by responsive email on August 2, 2024. Exhibit 15.

49. Mountain Voyage has neither taken a license to the Design Patents, nor engaged Ridge in discussions of acquiring such a license.

50. On information and belief, Mountain Voyage has not altered the design of any of its products to avoid infringement of the Design Patents.

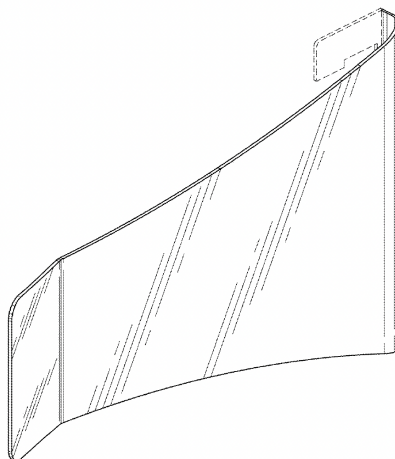
### **COUNT I**

#### **(Infringement of the ‘246 Patent)**

51. Ridge incorporates by reference and re-alleges each and every allegation of Paragraphs 1 through 50 as set forth herein.

52. Ridge owns all substantial rights, interest, and title in and to the ‘246 Patent, including the sole and exclusive right to prosecute this action and enforce the ‘246 Patent against infringers, and to collect damages and secure and enforce injunctive relief, for all relevant times.

53. The ‘246 Patent claims a clip having a design as follows:



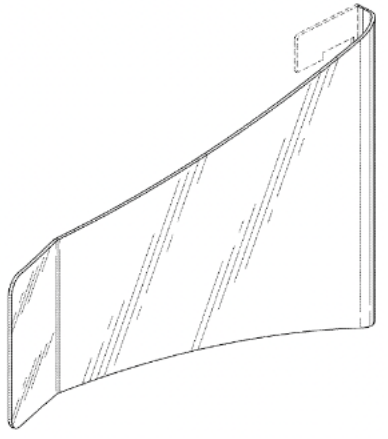

54. The '246 Patent claim is directed to patent eligible subject matter in the form of “machines” — “Clip[s]” — and thus satisfies 35 U.S.C. § 101.

55. The '246 Patent claim was allowed over substantial prior art submitted during examination of the same. It is presumed valid, including over that prior art.

56. The '246 Patent was allowed with consideration of pending *Inter Partes* Review petitions of its family member patent, U.S. Patent No. 10,791,808.

57. Mountain Voyage has made, had made, used, imported, supplied, distributed, sold, and/or offered for sale the Accused Products, including its Accused Products. *See, e.g.*, Exhibits 10, 11.

58. As set forth immediately below, Mountain Voyage has infringed and is infringing the claim of the '246 Patent literally and/or by way of the doctrine of equivalents by making, having made, using, importing, supplying, distributing, selling, and/or offering for sale the Accused Products:

'246 Patent, Fig. 1	Exemplary Accused Product
 <p data-bbox="397 751 479 787"><i>FIG. 1</i></p>	

59. Ridge has been damaged as a result of Mountain Voyage's infringing conduct alleged above. Thus, Mountain Voyage 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 and/or 35 U.S.C. § 289.

60. Mountain Voyage's infringement of the '246 Patent has caused, and will continue to cause, Ridge to suffer substantial and irreparable harm, unless and until that infringement is enjoined by this Court.

61. Mountain Voyage has been aware of Ridge's belief that Mountain Voyage infringes the '246 Patent since that patent issued on July 23, 2024.

62. Mountain Voyage's infringement of the '246 Patent is, has been, and continues to be, willful, intentional, deliberate, and/or in conscious disregard of Ridge's rights under the '246 Patent.

63. Ridge has complied with 35 U.S.C. § 287 with respect to the '246 Patent at least by

providing actual notice to Mountain Voyage on the day the '246 Patent issued.

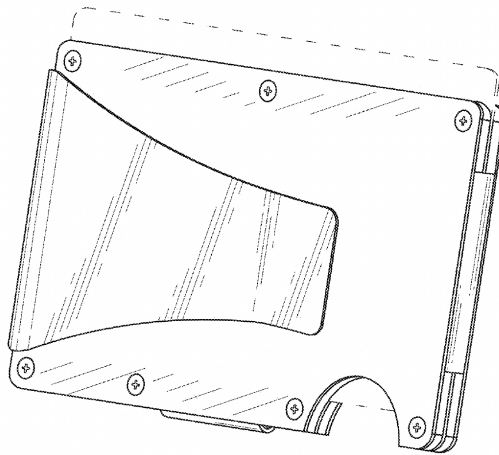
## COUNT II

### **(Infringement of the '852 Patent)**

64. Ridge incorporates by reference and re-alleges each and every allegation of Paragraphs 1 through 63 as set forth herein.

65. Ridge owns all substantial rights, interest, and title in and to the '852 Patent, including the sole and exclusive right to prosecute this action and enforce the '852 Patent against infringers, and to collect damages and secure and enforce injunctive relief, for all relevant times.

66. The '852 Patent claims a wallet having a design as follows:



67. The '852 Patent claim is directed to patent eligible subject matter in the form of “machines” — “Wallet[s]” — and thus satisfies 35 U.S.C. § 101.

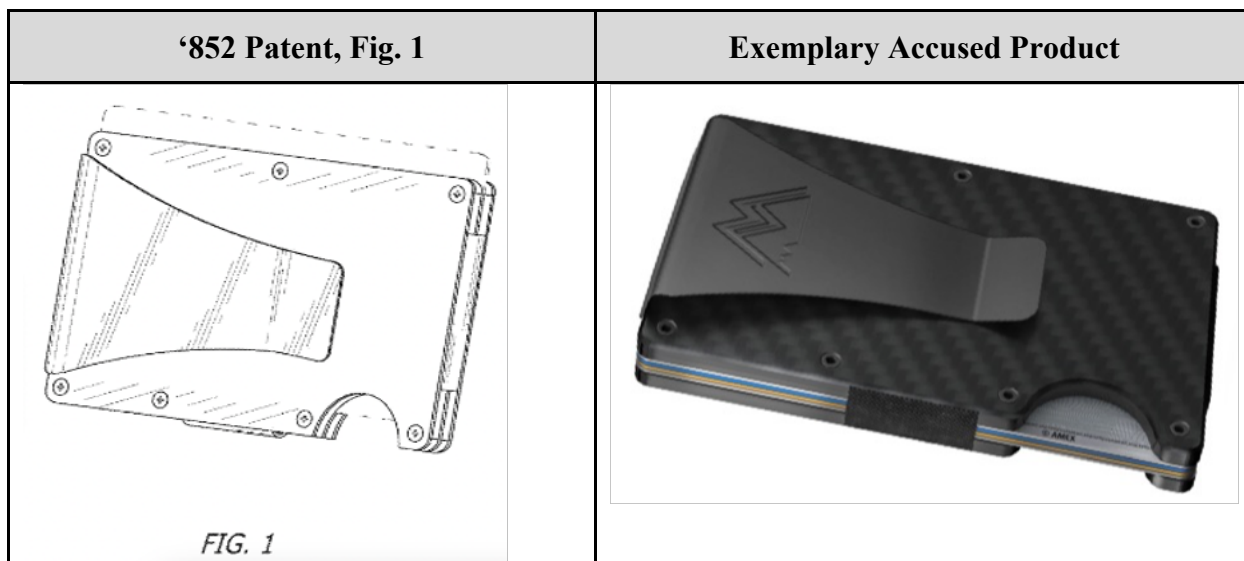
68. The '852 Patent claim was allowed over substantial prior art submitted during examination of the same. It is presumed valid, including over that prior art.

69. The '852 Patent was allowed with consideration of pending *Inter Partes* Review petitions of its family member patent, U.S. Patent No. 10,791,808.

70. Mountain Voyage has made, had made, used, imported, supplied, distributed, sold,

and/or offered for sale the Accused Products, including its Accused Products. *See, e.g.*, Exhibits 10, 11.

71. As set forth immediately below, Mountain Voyage has infringed and is infringing the claim of the '852 Patent literally and/or by way of the doctrine of equivalents by making, having made, using, importing, supplying, distributing, selling, and/or offering for sale the Accused Products:



72. Ridge has been damaged as a result of Mountain Voyage's infringing conduct alleged above. Thus, Mountain Voyage 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 and/or 35 U.S.C. § 289.

73. Mountain Voyage's infringement of the '852 Patent has caused, and will continue to cause, Ridge to suffer substantial and irreparable harm, unless and until that infringement is enjoined by this Court.

74. Mountain Voyage has been aware of Ridge's belief that Mountain Voyage infringes the '852 Patent since that patent issued on July 30, 2024.

75. Mountain Voyage's infringement of the '852 Patent is, has been, and continues to be, willful, intentional, deliberate, and/or in conscious disregard of Ridge's rights under the '852 Patent.

76. Ridge has complied with 35 U.S.C. § 287 with respect to the '852 Patent at least by providing actual notice to Mountain Voyage on the day the '852 Patent issued.

**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 Mountain Voyage has directly infringed the '246 Patent and hold Mountain Voyage liable for such infringement;

B. The Court find that Mountain Voyage has directly infringed the '852 Patent and hold Mountain Voyage liable for such infringement;

C. The Court preliminarily and permanently enjoin Mountain Voyage from further infringement of the '246 Patent and making, using, selling, and offering for sale the Accused Products;

D. The Court preliminarily and permanently enjoin Mountain Voyage from further infringement of the '852 Patent by making, using, selling, and offering for sale the Accused Products;

E. The Court award a complete accounting of all revenue and profits derived by Mountain Voyage from the unlawful conduct alleged herein, including without limitation, Mountain Voyage's total profit pursuant to 35 U.S.C. § 289.

F. The Court award damages pursuant to 35 U.S.C. § 284 adequate to compensate

Ridge for Mountain Voyage’s past infringement of the ‘246 Patent, including both pre- and post-judgment interest and costs as fixed by the Court;

G. The Court award damages pursuant to 35 U.S.C. § 284 adequate to compensate Ridge for Mountain Voyage’s past infringement of the ‘852 Patent, including both pre- and post-judgment interest and costs as fixed by the Court;

H. The Court find that the alleged unlawful conduct herein was willful;

I. The Court increase the damages to be awarded to Ridge by three times the amount found by the jury or assessed by the Court;

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

K. The Court award costs and expenses in this action;

L. The Court award prejudgment and post-judgment interest; and

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

Dated: September 5, 2024

Respectfully submitted,

/s/ Benjamin E. Weed

Benjamin E. Weed

Gina A. Johnson

**THE RIDGE WALLET LLC**

104 Main St., Suite 2C

Park Ridge, IL 60068

[ben@ridge.com](mailto:ben@ridge.com)

[gina@ridge.com](mailto:gina@ridge.com)

**ATTORNEYS FOR PLAINTIFF**

**THE RIDGE WALLET, LLC**