

**UNITED STATES DISTRICT COURT
DISTRICT OF COLORADO**

Civil Action No.1:24-cv-02841

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 Company (“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. Patent No. 12,089,704 (“704 Patent”) and U.S. Patent No. 12,114,743 (“743 Patent”). Collectively, the ‘704 Patent and the ‘743 Patent are referred to herein as the “Utility 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 (as that term is defined below) 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. It operates these websites from its Colorado location.

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 in 2014 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, 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.

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

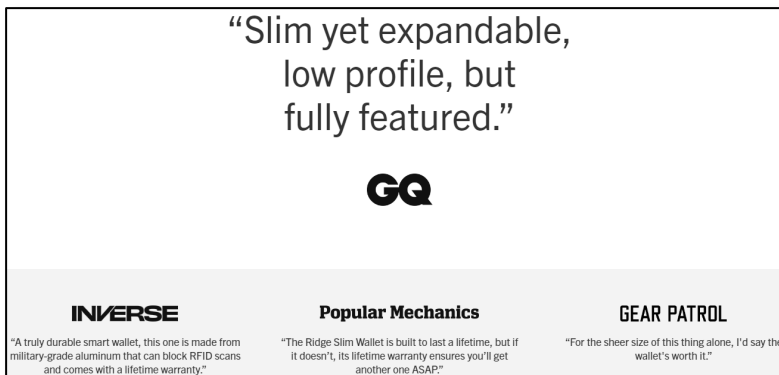


Exhibit 1.

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:

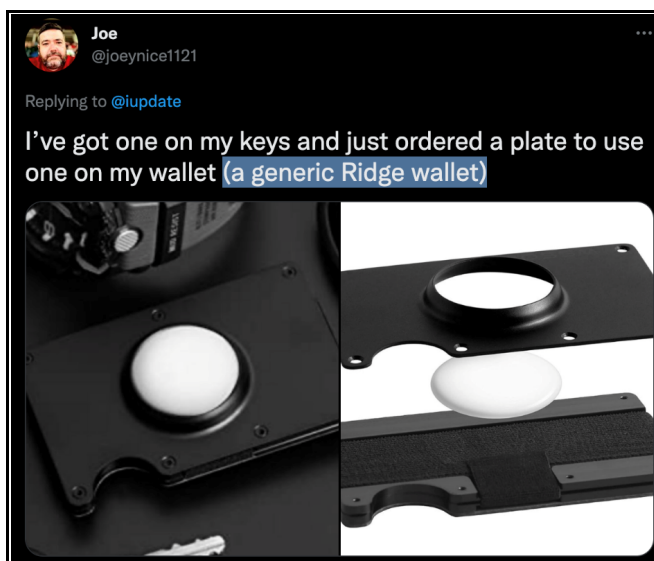


Exhibit 3.

22. In fact, 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 post, 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.

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 Utility Patents on the day each of the Utility Patents issued.

28. Mountain Voyage has previously altered the design of its products to avoid other of Ridge’s United States patents.

29. Mountain Voyage has not altered its design to try to avoid infringement of the Utility Patents.

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

THE UTILITY PATENTS

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

32. Ridge owns, by assignment, all right, title, and interest in the ‘704 Patent.

33. The ‘708 Patent is titled “Compact Wallet,” issued on September 17, 2024, and names Daniel Kane as the single inventor. The ‘708 Patent was issued from U.S. Patent Application No. 18/107,955 filed on February 9, 2023.

34. A true and accurate copy of the ‘708 Patent is attached hereto as Exhibit 6. A true and accurate copy of the assignment of the ‘708 Patent from the named inventor to Ridge is attached hereto as Exhibit 7.

35. Ridge owns, by assignment, all right, title, and interest in the ‘743 Patent.

36. The ‘743 Patent is titled “Compact Wallet,” issued on October 15, 2024, and names Daniel Kane as the single inventor. The ‘743 Patent was issued from U.S. Patent Application No. 18/146,279, filed on March 24, 2023.

37. A true and accurate copy of the ‘743 Patent is attached hereto as Exhibit 8. A true and accurate copy of the assignment of the ‘743 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**

38. 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.

39. 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.

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

41. 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 "'704 Patent Accused Products.'" Exhibit 11, Exhibit 13.

42. On its website, Mountain Voyage offers for sale several products that have a cash strap, 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 cash strap iterations of each of Mountain Voyage's wallet products are collectively referred to as the "'743 Patent Accused Products.'" Exhibit 12, Exhibit 14.

43. The '743 Patent Accused Products were first sold by Mountain Voyage after the '743 Patent's pre-grant publication published.

44. Collectively, the '704 Patent Accused Products and the '743 Patent Accused Products are referred to as the "Accused Products."

45. 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.

46. 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, Exhibit 12.

47. Mountain Voyage has made, used, offered for sale, and sold, and continues to make, use, offer for sale, and sell, Accused Products. *See* Exhibit 11, Exhibit 12, Exhibit 13, Exhibit 14.

48. Upon information and belief, Mountain Voyage has imported, and continues to import, Accused Products.

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

49. On September 17, 2024, the day the ‘704 Patent issued, Ridge sent an email to Mountain Voyage’s General Counsel asserting infringement of the ‘704 Patent. Exhibit 15.

50. On October 15, 2024, the day the ‘743 Patent issued, Ridge sent an email to Mountain Voyage’s General Counsel asserting infringement of the ‘743 Patent. Exhibit 16.

51. Mountain Voyage has not taken a license to the Utility Patents.

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

COUNT I

(Infringement of the ‘704 Patent)

53. Ridge incorporates by reference and re-alleges each and every allegation of Paragraphs 1 through 52 as if set forth herein.

54. Ridge owns all substantial rights, interest, and title in and to the ‘704 Patent, including the sole and exclusive right to prosecute this action and enforce the ‘704 Patent against infringers, and to collect damages and secure and enforce injunctive relief, for all relevant times.

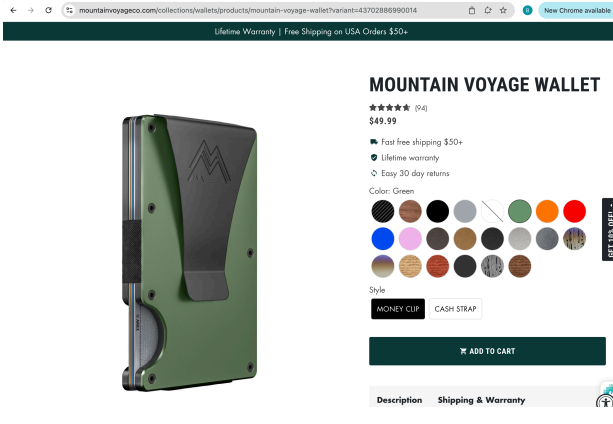
55. The ‘704 Patent claims are directed to patent eligible subject matter in the form of “machines” — “compact wallets” — and thus satisfy 35 U.S.C. § 101.

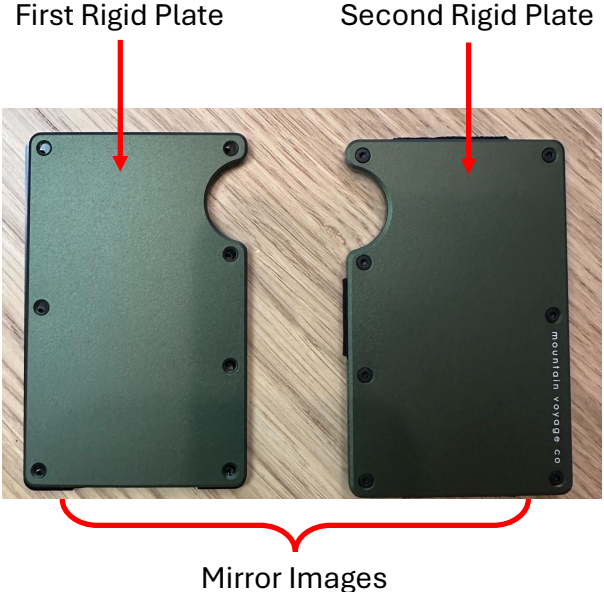
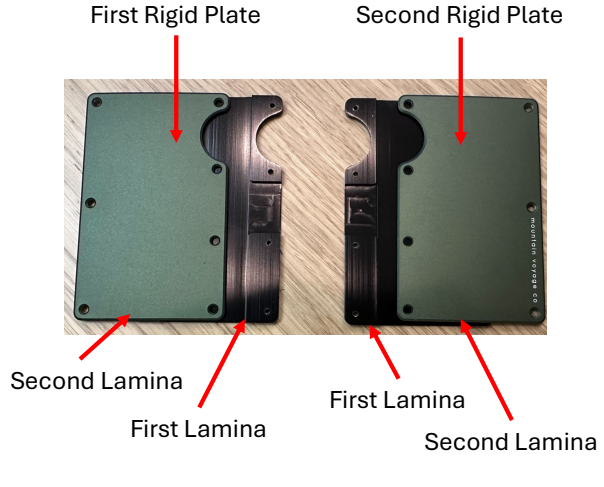
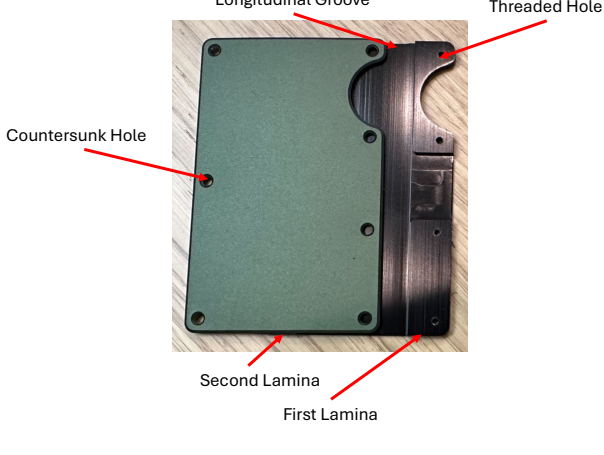
56. The ‘704 Patent claim was allowed over substantial prior art submitted during examination of the same. It is presumed valid, including over that prior art.

57. The ‘704 Patent was allowed with consideration of pending *Inter Partes* Review petitions of its family member patent, U.S. Patent No. 10,791,808.

58. Mountain Voyage has made, had made, used, imported, supplied, distributed, sold, and/or offered for sale the ‘704 Patent Accused Products. *See, e.g.*, Exhibit 11, Exhibit 13.

59. As set forth immediately below, Mountain Voyage has infringed and is infringing at least independent claim 1 of the ‘704 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 ‘704 Patent Accused Products.

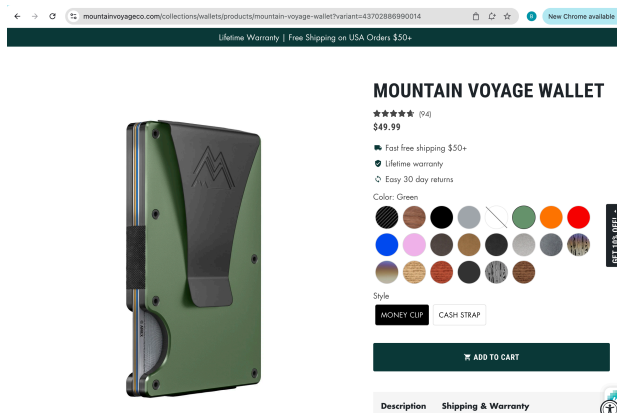
‘704 Patent – Claim 1	Exemplary Accused Product
<p>1. A compact wallet, comprising:</p>	

<p>a first rigid plate and a second rigid plate, wherein when assembled the first rigid plate and the second rigid plate are mirror images of one another, and</p>	
<p>wherein the first rigid plate and the second rigid plate each include a first lamina and a second lamina,</p>	
<p>wherein the first lamina includes a longitudinal groove and at least one threaded hole, and the second lamina includes at least one countersunk hole,</p>	

at least one flat head screw configured to thread into the at least one threaded hole through the at least one countersunk hole,



Flathead Screw



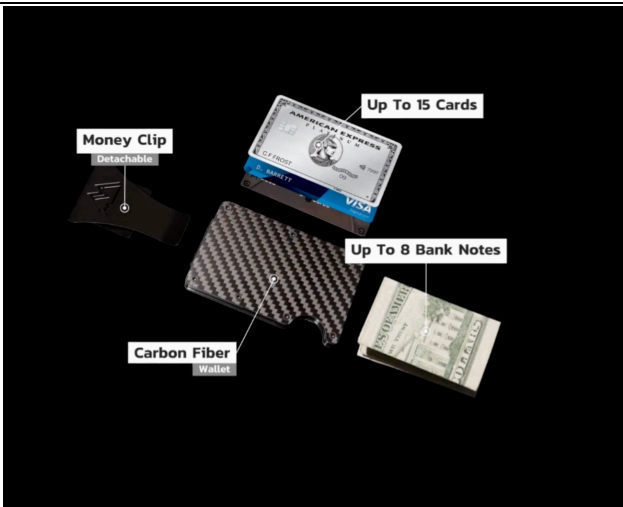

As can be seen from the above, the flathead screw is threaded into the at least one threaded hole through the at least one countersunk hole.

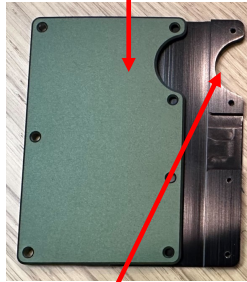



at least one encircling elastic band housed within the longitudinal groove to bias the first rigid plate and the second rigid plate inwardly and securely hold the card-like contents while providing an expandable volume between the first rigid plate and the second rigid plate,

Encircling Elastic Band



Longitudinal Groove

	 <p>The advertisement of “Up To 15 Cards” in the above screenshot from https://www.mountainvoyageco.com indicates that the encircling elastic band securely holds the card-like contents while providing an expandable volume between the first rigid plate and the second rigid plate.</p>
<p>an elastic strap attached to the encircling elastic band to register the card-like contents,</p>	 <p>Encircling Elastic Band</p> <p>Elastic Strap Attached to Encircling Elastic Band</p>

<p>a first finger notch adjacent to the elastic strap associated with the first rigid plate, a second finger notch adjacent to the elastic strap associated with the second rigid plate, and</p>	<div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p>First Rigid Plate</p>  <p>First Finger Notch</p> </div> <div style="text-align: center;"> <p>Second Rigid Plate</p>  <p>Second Finger Notch</p> </div> </div> <p>When the elastic strap is positioned in the longitudinal grooves, the first finger notch and the second finger notch above are adjacent the elastic strap as is required.</p>
<p>a money clip removably attached to the first rigid plate or the second rigid plate, wherein the money clip includes a tang insertable into a recess formed inside the first rigid plate or the second rigid plate.</p>	<div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p>Money Clip</p>  <p>Tang</p> </div> <div style="text-align: center;">  <p>Recess</p> </div> </div> <p>The money clip in the above image can be removed from the Mountain Voyage wallet by pushing, and is thus “removably attached to the first rigid plate or the second rigid plate.”</p> <p>The money clip includes the identified tang, which is insertable into a recess (the portion of the longitudinal channel boxed in red above) formed inside the first rigid plate.</p>

60. 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.

61. Mountain Voyage’s infringement of the ‘704 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.

62. Mountain Voyage has been aware of Ridge’s belief that Mountain Voyage infringes the ‘704 Patent since that patent issued on September 17, 2024.

63. Mountain Voyage’s infringement of the ‘704 Patent is, has been, and continues to be, willful, intentional, deliberate, and/or in conscious disregard of Ridge’s rights under the ‘704 Patent.

64. Ridge has complied with 35 U.S.C. § 287 with respect to the ‘704 Patent at least by providing actual notice to Mountain Voyage on the day the ‘704 Patent issued.

COUNT II

(Infringement of the ‘743 Patent)

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

66. Ridge owns all substantial rights, interest, and title in and to the ‘743 Patent, including the sole and exclusive right to prosecute this action and enforce the ‘743 Patent against infringers, and to collect damages and secure and enforce injunctive relief, for all relevant times.

67. The ‘743 Patent claims are directed to patent eligible subject matter in the form of “machines” — “compact wallets” — and thus satisfy 35 U.S.C. § 101.

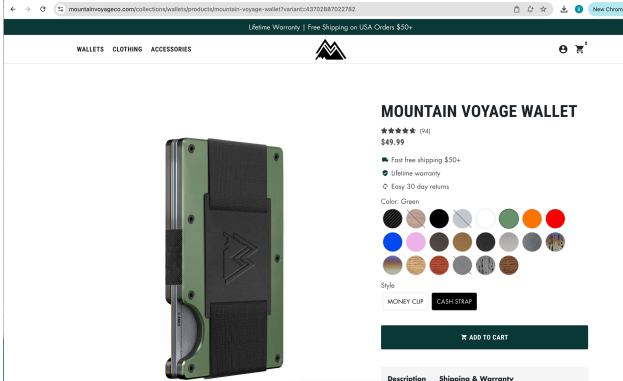


68. The ‘743 Patent claim was allowed over substantial prior art submitted during examination of the same. It is presumed valid, including over that prior art.

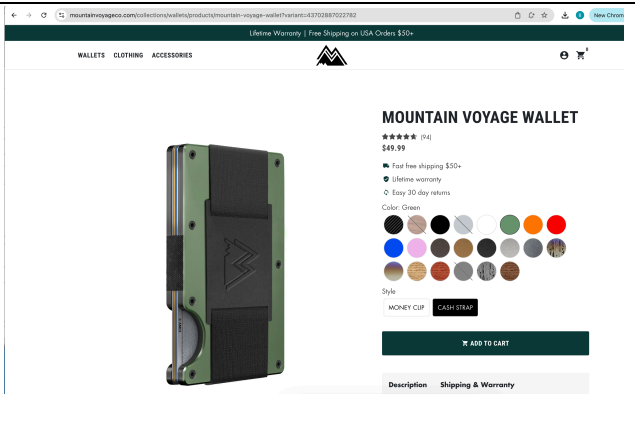
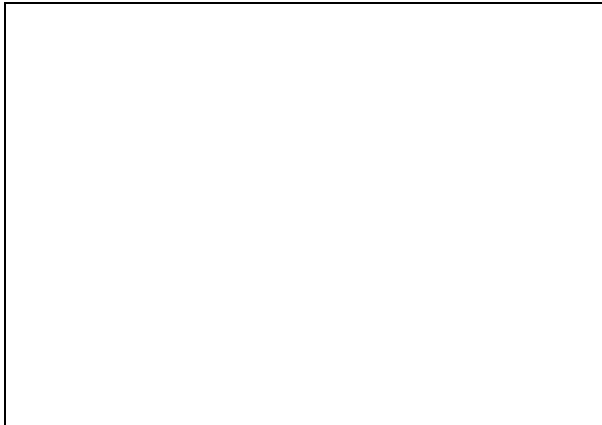
69. The ‘743 Patent was allowed with consideration of pending *Inter Partes* Review petitions of its family member patent, U.S. Patent No. 10,791,808.

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

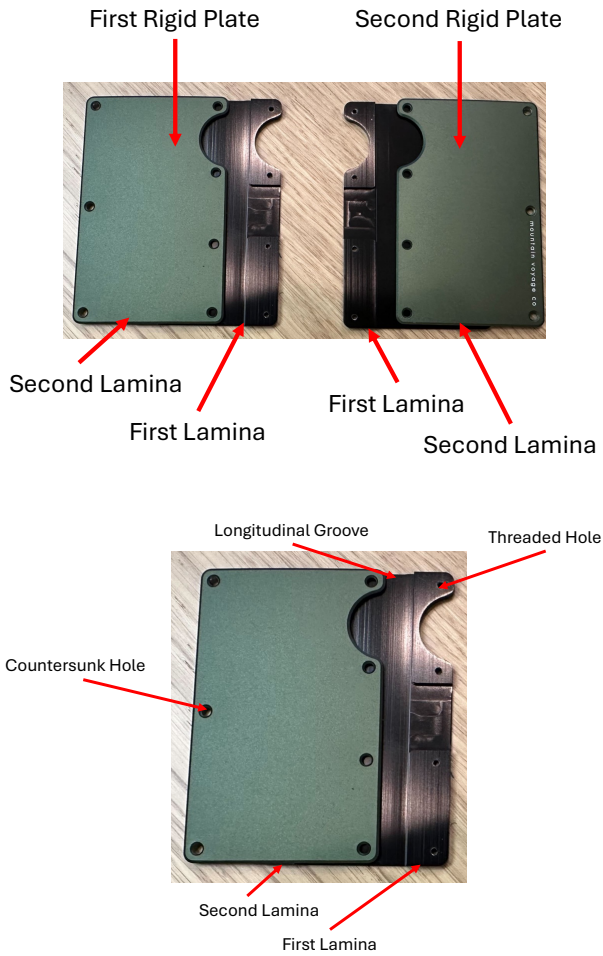
and/or offered for sale the ‘743 Patent Accused Products. *See, e.g.*, Exhibit 12, Exhibit 14.

71. As set forth immediately below, Mountain Voyage has infringed and is infringing at least independent claim 1 of the ‘743 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 ‘743 Patent Accused Products.

‘743 Patent – Claim 1	Exemplary Accused Product
<p>A compact wallet, comprising:</p>	
<p>a first rigid plate and a second rigid plate interposed to compress card-like contents there between,</p>	<div style="display: flex; justify-content: space-around;"> <div data-bbox="812 1029 1071 1071"> <p>First Rigid Plate</p>  </div> <div data-bbox="1136 1029 1396 1071"> <p>Second Rigid Plate</p>  </div> </div> <p>The first rigid plate and the second rigid plate are interposed to compress card-like contents therebetween, as can be seen in the following screen shot from https://www.mountainvoyageco.com:</p>



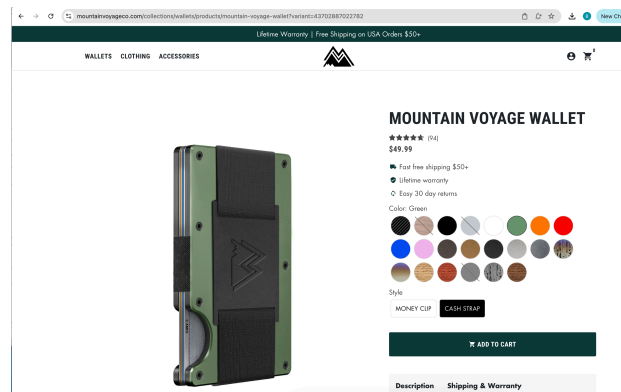
each of the first rigid plate and the second rigid plate including a first lamina and a second lamina, wherein the first lamina includes a longitudinal groove and at least one threaded hole, and the second lamina includes at least one countersunk hole,



at least one flat head screw configured to thread into the at least one threaded hole through the at least one countersunk hole,



Flathead Screw




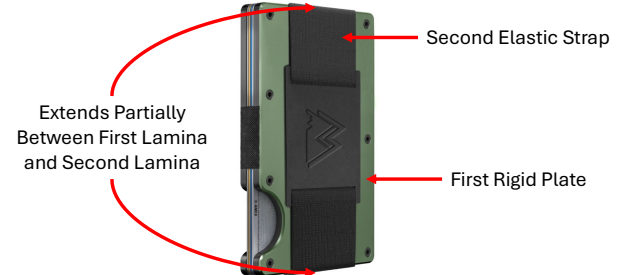

As can be seen from the above, the flat head screw is threaded into the at least one threaded hole through the at least one countersunk hole.

at least one encircling elastic band within the longitudinal groove to bias the first rigid plate and the second rigid plate inwardly and securely hold the card-like contents while providing an expandable volume between the first rigid plate and the second rigid plate, and

Encircling Elastic Band



Longitudinal Groove

	 <p>The advertisement of “Up To 15 Cards” in the above screenshot from https://www.mountainvoyageco.com indicates that the encircling elastic band securely holds the card-like contents while providing an expandable volume between the first rigid plate and the second rigid plate.</p>
<p>at least a second elastic strap positioned over the outside surface of the first rigid plate and extending at least partially between the first lamina and the second lamina of the first rigid plate.</p>	 <p>The cash strap of the Mountain Voyage products, when removed from the wallet, confirms that the second elastic strap extends at least partially between the first lamina and the second lamina:</p> 

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.

73. Mountain Voyage's infringement of the '743 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 '743 Patent since that patent issued on October 15, 2024.

75. Mountain Voyage's infringement of the '743 Patent is, has been, and continues to be, willful, intentional, deliberate, and/or in conscious disregard of Ridge's rights under the '743 Patent.

76. Ridge has complied with 35 U.S.C. § 287 with respect to the '743 Patent at least by providing actual notice to Mountain Voyage on the day the '743 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 '704 Patent and hold Mountain Voyage liable for such infringement;

B. The Court find that Mountain Voyage has directly infringed the '743 Patent and hold Mountain Voyage liable for such infringement;

C. The Court preliminarily and permanently enjoin Mountain Voyage from further infringement of the '704 Patent and making, using, selling, and offering for sale the '704 Patent Accused Products;

D. The Court preliminarily and permanently enjoin Mountain Voyage from further infringement of the ‘743 Patent by making, using, selling, and offering for sale the ‘743 Patent Accused Products;

E. The Court award damages pursuant to 35 U.S.C. § 284 adequate to compensate Ridge for Mountain Voyage’s past infringement of the ‘704 Patent, including both pre- and post-judgment interest and costs as fixed by the Court;

F. The Court award damages pursuant to 35 U.S.C. § 284 adequate to compensate Ridge for Mountain Voyage’s past infringement of the ‘743 Patent, including both pre- and post-judgment interest and costs as fixed by the Court;

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

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

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

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

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

Dated: October 15, 2024

Respectfully submitted,

/s/ Benjamin E. Weed

Benjamin E. Weed

Gina A. Johnson

THE RIDGE WALLET LLC

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ATTORNEYS FOR PLAINTIFF

THE RIDGE WALLET, LLC