



CONSULT INTELLIGENCE DOSSIER

WITH DEEPDIVES INTO THEIR WORLD

DWD Ventures LLC d/b/a LYX Hydration

The person, the company, the industry, the market, and the matter, fused for the first consult

Prepared by KNOX for prospective counsel · August 28, 2026

CONFIDENTIAL INTELLIGENCE WORK PRODUCT. This dossier frames a prospective client for counsel ahead of a first consult. It is compiled entirely from lawful public sources: the company's own site and press, federal and state dockets, USPTO and TTAB records, trade and local press. It is not legal advice, and nothing here substitutes for the firm's own intake, conflicts, and engagement procedures. Confidence labels appear where a proposition rests on inference rather than a primary record.

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I. BOTTOM LINE UP FRONT

The caller is not the company its adversary thinks it sued. On paper, DWD Ventures LLC is a small Fort Worth limited liability company selling a powdered dog drink. In fact it is a venture-backed, professionally operated consumer brand: the No. 1 canine hydration product on Amazon, rebranded by the New York agency behind Hippeas and BODYARMOR, run day to day by the operators who built Ultima Replenisher to an exit, and financed by Morrison Seger Venture Capital Partners with Capital Factory alongside. The gap between appearance and reality is the single most important fact in this file, because the adversary priced its litigation strategy against the appearance.

What they need is specific and datable. A federal trademark infringement action, Ridley USA Inc. v. DWD Ventures LLC, No. 4:26-cv-00854 (N.D. Tex., Fort Worth, Hon. Mark T. Pittman), arrived July 13, 2026 after a year of board proceedings the founder answered pro se. The answer is now on file through counsel and the matter is entering the discovery window. The client does not need rescue. It needs a litigation partner for a fight that is already framed, resourced, and documented.

The engagement signals, read together. A sophisticated client with institutional investors, a rising consumer brand with genuine press, a defensible position supported by an assembled public record, and a matter that has already been through professional intelligence work: the adversary profile, the weaknesses, the discovery instruments and the deposition map exist and are in this firm's hands alongside this dossier. The client's economics and investor structure are consistent with a funded defense; the investors' names are publicly attached to the brand. Confidence: HIGH on every load-bearing fact above; each carries its source in Section X.

THE WEDGE. Ridley's escalation premise was a defendant who could not answer. That premise died on August 19. What remains is a plaintiff whose entire enforcement history prefers cheap wins, now facing a professionally defended, venture-backed brand with the record already assembled. The firm that walks into this consult holds that sentence, and the file behind it.

II. THE PEOPLE: THE FOUNDER AND THE PRINCIPAL

II.A. Dylan Jones, founder and chief executive

U.S. Air Force veteran and TCU alumnus based in Fort Worth. Conceived the product after observing that military working dogs under-drink during missions; the origin story is genuinely his and he tells it well, on podcasts, at Fort Worth Business Assistance Center events, and in the trade press. He spent roughly a year in customer discovery selling the first canned version, then called the Pet Water Project, from a cooler at Fort Worth farmers markets before institutional capital arrived. His own framing of company-building is instructive for counsel: he speaks publicly about leveraging equity as a startup's strongest tool, which is consistent with how the company has actually been assembled: capital, then operators, then brand, each brought in with a stake.

The fact that matters most for the engagement: Jones has personally carried the trademark board defense pro se for a year, including answering an AmLaw 100 firm's amended pleadings. Counsel is not meeting a founder who ignored a legal problem. Counsel is meeting one who held the line alone until the fight moved to a forum where an LLC cannot appear without a lawyer. Expect a client who reads the filings, asks precise questions, and knows the record better than most clients ever will. Confidence: HIGH; sources are the board docket and his own public statements.

II.B. David Deering, the DWD principal

Fort Worth entrepreneur and investor; his public profile lists LYX under the banner of pre-revenue, early-stage and special-situations investing, alongside his role leading UnderPar Life, a 2025 D CEO Innovation Awards finalist. The DWD initials, the special-situations positioning, and the public affiliation are consistent with Deering as a principal of the holding entity with Jones as founder-operator. The precise capitalization table is not publicly verifiable; the firm should confirm ownership internally on day one, because Rule 7.1 corporate disclosure will require it anyway. Confidence: affiliation HIGH; ownership structure MEDIUM, flagged again in Section IX.

Read for the room: two principals, two registers. Jones is the operator and the public face; Deering is the capital-and-relationships side with a wide local network. The consult should speak to both: case strategy and cost discipline for the principal, the defense of the brand's story for the founder.

II.C. The operating bench behind them

Skeet Freeman, President, built Ultima Replenisher from a kitchen formula into a national electrolyte brand and through its acquisition by WM Partners; Joey Bilotti, who joined alongside him, grew Ultima's Amazon storefront from twenty thousand dollars to thirty million. This team has taken an electrolyte brand to an exit before, and knows precisely what a forced rebrand would

destroy. That knowledge is quiet leverage for the defense: the people who best understand the value of the LYX name are running it.

III. THE COMPANY: FROM FARMERS MARKET TO CATEGORY LEADER

III.A. The entity

Field	Value
Legal name	DWD Ventures LLC, a Texas limited liability company
d/b/a	LYX Hydration · lyxhydration.com
Address of record	3208 Collinworth St., Fort Worth, TX 76107
Product	Powdered canine electrolyte hydration mix, chicken or beef broth on a coconut-water base, in stick packs; formerly canned, as the Pet Water Project
Channels	Amazon (No. 1 in canine hydration), DTC via Shopify, Walmart marketplace, Instacart
Investors	Morrison Seger Venture Capital Partners (lead; Rogers Healy); Capital Factory
Brand	Created by Six+One, NYC; Fellix and Poppins typefaces; sky, brand blue, and navy palette; voice: playful, science-under-the-charm; tagline register: It's Hydralicious
Recognition	Ad Age top-13 campaign; AKC TV; Entrepreneur Elevator Pitch; Fort Worth Report; EventMarketer

III.B. The arc, in five moves

- 1 Insight.** Working, active, and senior dogs under-drink from a bowl. The founder saw it first in military working dogs, then confirmed it across a year of farmers-market weekends: dogs drank the product on the spot.
- 2 First capital.** Morrison Seger, led by Rogers Healy, came in as first investor when the company was still the Pet Water Project selling cans from a cooler, and directed the pivot that followed.
- 3 The pivot.** Canned liquid was expensive to make and ship. The move to a powdered stick-pack format cut production cost and opened direct-to-consumer economics.
- 4 The brand.** Six+One, the agency whose client work spans Hippeas and BODYARMOR and which claims over \$6.4 billion in brand exits tied to its portfolio, built the LYX name and identity from the ground up for shelf presence and DTC conversion.

5 Traction, then operators. The AKC USA 250 activation in Philadelphia, built dog-first with creative at dog height and hydration checkpoints, produced field data (80 percent of participating dogs showed dehydration signs) and an Ad Age top-13 selection alongside Heinz, Heineken, Walmart, Duolingo, and American Eagle. LYX reached No. 1 on Amazon in canine hydration, and Morrison Seger recruited the Ultima Replenisher operators to scale it.

WHY THE ARC MATTERS TO THE DEFENSE. The name under attack is not a label the client can shed. It is the deliberate product of an institutional incubation: named by a top agency, carried to a No. 1 ranking, fronted by national press, and stewarded by operators who have exited an electrolyte brand before. A forced rebrand does not cost this client a logo. It costs the accumulated equity of everything above, which is exactly what damages experts and settlement postures are built from.

IV. THE INDUSTRY: PET SUPPLEMENTS, AND THE HYDRATION GAP

The company sits at the intersection of two proven curves. Human electrolyte hydration has crossed thirty five billion dollars globally, a category rewritten in a decade by challenger brands. Pet supplements are tracking the same arc: roughly \$2.76 billion in 2025, growing at about seven percent annually, as owners extend their own wellness habits to their animals. The instructive comparable is hip-and-joint supplements: a subcategory that matured from novelty to standard of care and produced a \$610 million exit at 8.4x revenue.

The structural fact: no major pet company has successfully launched a dog-specific hydration product. Purina sells a hydration supplement for cats; Mars, Hill's, and Royal Canin have not entered dog hydration. The incumbents' absence is the industry story in one sentence, and the client is currently the name at the front of the queue.

For counsel, the industry lens converts to leverage arithmetic: the adversary is a cattle-supplement manufacturer enforcing marks rooted in livestock lick tubs; the client is the visible early leader of an emerging companion-animal category the adversary has never entered in forty seven years. The industries share only three letters. Confidence: category figures SOURCED to the company's published release and its underlying analyst citations; the incumbents' absence is independently checkable shelf fact.

V. THE MARKET: THE SUBCATEGORY NOBODY OWNS

Signal	Value	Reading
Subcategory projection	\$135M to \$480M by 2030	If dog hydration follows the hip-and-joint adoption curve
Search demand	34,000 monthly searches, dog electrolytes, March 2026	Up 86 percent year over year; demand outpacing supply
Category shelf	No entry from Mars, Hill's, Royal Canin; Purina cat-only	The gap is open, and being noticed
Client position	No. 1 on Amazon in canine hydration	The visible front-runner in the open gap
Coexistence fact	LIXIT, a pet-watering brand, coexisting for decades	Directly relevant to the confusion theory in the matter

The market lens tells the firm two things at once. First, the client is worth defending: it is the early leader of a subcategory with a plausible nine-figure ceiling, which makes the brand's continuity a business-critical asset rather than a nice-to-have. Second, the client will be bought, funded, or

scaled during the life of this matter; every strategic decision in the litigation should be made with a future diligence room in mind. Clean dockets and documented discipline are part of the client's enterprise value now.

VI. THE MATTER AT THE DOOR: RIDLEY V. DWD

Field	Value
Caption	Ridley USA Inc. v. DWD Ventures LLC d/b/a Lyx Hydration
Docket	No. 4:26-cv-00854, N.D. Tex., Fort Worth Division
Judge	Hon. Mark T. Pittman
Claim	15 U.S.C. § 1114 trademark infringement; jury demanded by plaintiff
Filed	July 13, 2026, after a year of TTAB proceedings
Posture	Answer and counterclaim on file through counsel; discovery window opening

The prequel matters more than the complaint. Ridley USA Inc., a cattle-supplement manufacturer, spent a year pressing the founder at the trademark board, where he answered pro se, before filing in a federal forum where an LLC cannot appear without counsel. The forum move is tactical: it converts a paper fight the adversary was not winning into a resource fight it assumed the defendant could not staff. That assumption has already failed once, on the answer deadline, and the rest of the record suggests it will keep failing.

What already exists, and travels with this dossier: a 25-page Adversary Intelligence Dossier on Ridley (its enforcement history across nineteen proceedings, its playbook, ten graded weaknesses, and a battle map keyed to the Fifth Circuit confusion digits), and a 47-page Discovery Attack Plan (42 requests for admission, 25 interrogatories under the Rule 33 cap, 31 production requests, 22 deposition topics, and the deposition map). The firm is not inheriting a cold file. It is inheriting a war room. Confidence: HIGH; both documents are in the same delivery as this dossier.

CONSULT POSTURE. This is the rare intake where the prospective client arrives with the intelligence phase already complete. The consult conversation is therefore not what do we know, but what the firm will do with what is known: strategy, signatures, and the courtroom.

VII. THE ENGAGEMENT, SHAPED: WHAT THE FIRM WALKS INTO

- 1 Immediate.** Ratify or refine the served discovery plan; calendar the scheduling order; confirm the litigation hold and transcript intake protocol that are already drafted in the matter workspace.
- 2 Near term.** Serve the instrument sets substantially as drafted after counsel review; sequence the held-reserve items as the cure windows close; take the four tier-one depositions in the mapped order.
- 3 Through resolution.** The assembled record supports either a merits defense through summary judgment on the confusion digits, or a negotiated coexistence that keeps LYX alive in the companion-animal lane; the endgame architecture for both is in the adversary dossier at Section IX.

The client's own materials estimate the fully-worked defense in conventional hands at a seven-figure spend; the intelligence layer of that work is done and its product is in this file. What remains for the firm is the part only licensed counsel can do, which is precisely the part the firm bills highest and defends best: judgment, advocacy, and the signature.

VIII. FIT AND RISK FOR THE FIRM

VIII.A. Run before the consult

- 1 Conflicts.** Adverse parties and related entities to screen: Ridley USA Inc.; Alltech, Inc. (parent); Akralos Animal Nutrition LLC (the Alltech and ADM joint venture holding transferred marks); Ridley Block Operations; opposing counsel of record in 4:26-cv-00854. Friendly-side entities: DWD Ventures LLC; Morrison Seger Venture Capital Partners; Capital Factory.
- 2 Rule 7.1 disclosure.** The LLC's ownership must be stated on appearance. The public record supports affiliation but not percentages; obtain the capitalization table at intake.
- 3 Engagement mechanics.** The signing entity is DWD Ventures LLC. Establish at the consult who instructs counsel as between Jones and Deering, and how investor communications will be handled; a venture-backed client means board-level reporting expectations from month one.

VIII.B. Collectability and client-quality read

Institutionally backed, professionally operated, and revenue-generating across four channels, with investors whose names are publicly attached to the brand's survival. The collectability read is favorable, and the client-quality read is better than favorable: this is a founder who answered an AmLaw 100 firm's pleadings alone for a year, now surrounded by operators who have run a company through an exit. Expect engagement, not absenteeism. Confidence: collectability MEDIUM-HIGH on public signals; the firm should apply its own financial intake as standard.

VIII.C. The honest risks

- 1 Asymmetric adversary resources.** The plaintiff's parent is a global nutrition company with an AmLaw 100 firm engaged; the defense must be run for leverage per dollar, which the pre-built instrument set is designed for.
- 2 Ownership opacity.** Until the cap table is confirmed, treat the DWD structure as unverified; this is an intake item, not an obstacle.
- 3 Brand-emotion risk.** The name is the founder's public identity and the investors' visible bet; settlement conversations that involve the name will be harder than pure economics suggests. Counsel should surface the coexistence architecture early, so the client's expectations form around real exits rather than absolutes.

IX. CONFIDENCE AND GAPS

Proposition	Grade	Basis
Entity, address, product, channels	HIGH	Company site, marketplace listings, dossier verification
Investor identities	HIGH	Company press release; PitchBook per prior dossier
Amazon No. 1 ranking	HIGH as claimed	Company release; spot-checkable on the listing
Category and market figures	SOURCED, single-origin	Company release citing analyst estimates; not independently re-derived
Deering role and DWD ownership	MEDIUM	Public affiliation; percentages unverified
Adversary posture and docket facts	HIGH	Federal and TTAB dockets, pulled in the companion dossiers

Gaps stated plainly: the capitalization table; the company's actual revenue figures (no public source states them; nothing in this dossier estimates them); and the terms of the Morrison Seger investment. All three are one conversation away at intake, and none changes the intelligence above. What was searched and not found is listed rather than filled: that is the house rule.

X. MASTER REFERENCE LOG

EXHIBIT BASIS 1. lyxhydration.com, home, about, and press pages, read August 28, 2026: product, brand voice, founder statements, veteran identity.

EXHIBIT BASIS 2. LYX press release, Morrison Seger-Backed LYX Hydration Names CPG Veterans to Lead Next Phase of Growth, lyxhydration.com/blogs/lyx-blog, read August 28, 2026: company arc, investors, Six+One, operators, category figures, Ad Age recognition, AKC activation.

EXHIBIT BASIS 3. Fort Worth Report / Innovate Fort Worth podcast, Hydrating Dogs for Their Health, November 18, 2025: founder background, military origin, customer discovery, equity philosophy.

EXHIBIT BASIS 4. Fort Worth Report, Made in Tarrant, December 14, 2025: founder profile and channel strategy.

EXHIBIT BASIS 5. LYX LinkedIn company page and lyxhydration Instagram, read August 28, 2026: brand voice, veteran-owned positioning, activity through August 27, 2026.

EXHIBIT BASIS 6. Fort Worth Business Assistance Center public event postings, July 2026: founder speaking appearances.

EXHIBIT BASIS 7. Ridley USA Inc. v. DWD Ventures LLC, No. 4:26-cv-00854 (N.D. Tex.): docket facts as compiled in the KNOX Adversary Intelligence Dossier of August 7, 2026 and verified against the live docket.

EXHIBIT BASIS 8. TTAB Opposition No. 91300524 and related board records, as compiled in the companion dossiers.

EXHIBIT BASIS 9. KNOX Adversary Intelligence Dossier, Ridley v. DWD, August 7, 2026, and KNOX Discovery Attack Plan, August 27, 2026: companion volumes delivered with this dossier.

Compiled by KNOX on August 28, 2026, America/Chicago. Sources are public; no privileged or confidential material was accessed or used. This dossier is intelligence work product for prospective counsel, not legal advice.