

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

PAWESOME PET PRODUCTS LLC, et al.

Plaintiffs,

v.

COLORFLOWERS, et al.,

Defendants.

Civil Action No. 22-629

(Judge Hornak)

[PROPOSED] PRELIMINARY INJUNCTION ORDER

WHEREAS, on May 10, 2022, Plaintiffs Pawesome Pet Products LLC and Cindy Ghukasyan filed an *Ex Parte* Application seeking 1) a temporary restraining order; 2) an order restraining assets and “Merchant Storefronts”, as defined *infra*; 3) an order to show cause why a preliminary injunction should not issue; and 4) an order authorizing expedited discovery against all of the Defendants identified on the attached Schedule “A”, Alibaba.com US LLC d/b/a Aliexpress.com (“Aliexpress”), Amazon.com, Inc. and its affiliate, Amazon Services LLC d/b/a Amazon.com (“Amazon”), eBay, Inc. d/b/a eBay.com (“eBay”), and Context Logic, Inc d/b/a wish.com (“Wish”) (“Third Party Service Provider(s)”) and AliPay US Inc. d/b/a Alipay.com (“Alipay”), Amazon Payments, Inc. d/b/a pay.amazon.com, and PayPal, Inc. d/b/a paypal.com (“PayPal”) (“Financial Institution(s)”), in light of Defendants’ intentional and willful offerings for sale and/or sales of Infringing Products¹ (“Application”);

¹ As alleged in Plaintiffs’ Complaint, “. . .the Defendants identified in **Schedule “A”** of the Complaint, were and/are currently manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale and or/selling products that have infringed upon one or more of the claims of U.S. Patent No. 10,477,838 (“Plaintiffs’ Patent” or “the ‘838 patent”) by offering for sale, selling, and distributing knock-off versions of Plaintiffs’ BRISTLY[®] dog toothbrush (“Infringing Products”). Defendants accomplish

WHEREAS, on the same day, Plaintiffs filed an Ex Parte Motion for an Order Authorizing Alternative Service on Defendants Pursuant to Federal Rule of Civil Procedure 4(f)(3);

WHEREAS on May 10, 2022, the Court entered the following Orders:

(A) 1) a temporary restraining order; 2) an order restraining assets and Merchant Storefronts; 3) an order to show cause why a preliminary injunction should not issue; and 4) an order authorizing expedited discovery against all of the Defendants identified on the attached **Schedule “A”**, the Third Party Service Provider and the Financial Institutions (“TRO”) (ECF No. 22); and

(B) an Order Authorizing Alternative Service on Defendants Pursuant to Federal Rule of Civil Procedure 4(f)(3) (ECF No. 24);

WHEREAS, on May 18, 2022, upon Plaintiffs’ Motion, the Court extended the temporary restraining order and ordered the Defendants to appear on May 31, 2022 at 4:00 pm, EDT, and show cause why a preliminary injunction should not be entered (ECF No. 31);

WHEREAS, on May 31, 2022 at 4:00 pm, Plaintiffs appeared for the Order to Show Cause Hearing, however no Defendants appeared. Further, no Third Party Service Providers or Financial Institutions appeared.

ORDER

A. IT IS HEREBY ORDERED, as sufficient cause has been shown, the injunctive relief previously granted on May 10, 2022, and extended on shall remain in place through the pendency of this litigation or until further order of this Court, and issuing this Preliminary

their infringing sales through the use of, at least, the Internet based e-commerce stores operated via at least the Third Party Service Provider marketplace platform.

Injunction is warranted under 35 U.S.C. § 283, Federal Rules of Civil Procedure 64 and 65, and The All Writs Act, 28 U.S.C. § 1651(a).

Accordingly, each Defendant, its officers, directors, employees, agents, subsidiaries, distributors, and all persons in active concert or participation with any Defendant having notice of this Order shall continue to be restrained as follows:

- (1) from (a) their unauthorized and unlicensed use of Plaintiffs' Patent, distribution, marketing, advertising, offering for sale, or sale of any Infringing Products; and (b) shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner products that infringe upon at least one claim of the Plaintiff's Patent;
- (2) from secreting, concealing, destroying, altering, selling off, transferring or otherwise disposing of and/or dealing with any computer files, data, business records, documents or any other records or evidence relating to their User Accounts,² Merchant Storefronts³ or any money, securities or other property or assets of Defendants (hereinafter collectively referred to as "Defendants' Assets");
- (3) effecting assignments or transfers, forming new entities or associations, or creating and/or utilizing any other platform, User Account, Merchant Storefront or any other means of importation, exportation, advertising, marketing, promotion, distribution, and/or

² As defined in the Application, a "User Account" is, as defined in the Complaint, any and all accounts with at least one of the online marketplace platform(s), Amazon.com, eBay.com, Aliexpress.com, and Wish.com, as well as any and all as yet undiscovered accounts with additional online marketplace platforms held by or associated with Defendants, their respective officers, employees, agents, servants and all other persons in active concert with any of them.

³ As defined in the Application, a "Merchant Storefront" is any and all User Accounts through which Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them operate storefronts to manufacture, import, export, advertise, market, promote, distribute, display, offer for sale, sell and/or otherwise deal in products which are held by or associated with Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them.

display for the purposes of circumventing or otherwise avoiding the prohibitions set forth in this Order;

- (4) each Defendant, its officers, directors, employees, agents, subsidiaries, distributors, and all persons in active concert or participation with any Defendant having notice of this Order shall immediately offering for sale the Infringing Products within metatags or other markers within website source code, from use on any web page (including as the title of any product listing), from any advertising links to other websites, from search engines' databases or cache memory, and any other form of use such terms or works which is visible to a computer user or serves to direct computer searches to Internet based e-commerce stores owned, or operated by each Defendant, including the Merchant Storefronts operating under the Seller IDs;
- (5) each Defendant shall not transfer ownership of the User Accounts or Merchant Storefronts associated with the Seller IDs;
- (6) each Defendant shall preserve copies of all computer files relating to the use of any User Accounts and/or Merchant Storefronts under the Seller IDs and shall take steps necessary to retrieve computer files relating to the use of the User Accounts and/or Merchant Storefronts under their Seller IDs that may be deleted before the entry of this Order;
- (7) upon receipt of notice of this Order, Defendants and all financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to Alibaba.com US LLC d/b/a Aliexpress.com ("Aliexpress"), Amazon.com, Inc. and its affiliate, Amazon Services LLC d/b/a Amazon.com ("Amazon"), eBay, Inc. d/b/a eBay.com ("eBay"), and Context Logic, Inc d/b/a wish.com ("Wish") ("Third Party Service Provider(s)") and Zhejiang Ant Small and

Micro Financial Services Group Co., Ltd. AliPay (China) Internet Technology Co. Ltd., and Alipay.com Co., Ltd. (collectively referred to as “AliPay”)⁴, Amazon Payments, Inc. d/b/a pay.amazon.com, and PayPal, Inc. d/b/a paypal.com (“PayPal”) (“Financial Institution(s)”), and their related companies and affiliates, shall immediately identify and restrain all funds, as opposed to ongoing account activity, in or which are hereafter transmitted into the accounts related to the Defendants as identified on Schedule “A” hereto, as well as all funds in or which are transmitted into (i) any other accounts of the same customer(s); (ii) any other accounts which transfer funds into the same financial institution account(s), and/or any of the other accounts subject to this Order; and (iii) any other accounts tied to or used by any of the Seller IDs identified on Schedule “A” hereto;⁵

(8) upon receipt of notice of this Order, Defendants and all financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to the Third Party Service Provider(s) and the Financial Institution(s), shall immediately divert to a holding account for the trust of the Court all funds in or which are hereafter transmitted into all accounts related to Defendants identified in Schedule “A” hereto, and associated payment accounts, and any other accounts for the same customer(s) as well as any other accounts which transfer funds into the same financial institution account(s) as any other accounts subject to this Order;

(9) The Third Party Service Provider(s) and Financial Institution(s) shall further, within five (5) business days of receiving this Order, provide Plaintiffs’ counsel with all data that

⁴ WorldPay US, Inc. (“WorldPay”) processes transactions on behalf of Alibaba and Alipay, which may appear as “Aliexpress” on a cardholder’s credit card statement.

⁵ This Order contemplates that discovery may reveal that Defendants may have other user accounts operated by other Third Party Service Providers and Financial Institutions and that the additionally discovery Third Party Service Providers and Financial Institutions, once identified and provided with notice, shall also be subject to the discovery, restraints and injunctions set forth in this Order.

details (i) an accounting of the total funds restrained and identifies the financial account(s) which the restrained funds are related to, and (ii) the account transactions related to all funds transmitted into financial account(s) which have been restrained. Such restraining of the funds and the disclosure of the related financial institution account information shall be made without notice to the account holders, until after those accounts are restrained. No funds restrained by this Order shall be transferred or surrendered by any Third Party Service Provider or Financial Institution for any purpose (other than pursuant to a chargeback made pursuant to that Third Party Service Provider or Financial Institution's security interest in the funds) without express authorization of this Court;

(10) Upon Plaintiffs' request, any Internet marketplace who is provided with notice of this Order, including but not limited to the Third Party Service Provider(s) and Financial Institution(s), shall immediately cease fulfillment of and sequester Defendants' inventory assets corresponding to the Seller IDs identified on Schedule "A" hereto in its inventory, possession, custody, or control, and hold such goods in trust for the Court during pendency of this action;

(11) this Order shall apply to the Seller IDs, associated Accounts and Merchant Storefronts, and any other seller identification names, Accounts or Merchant Storefronts, Third Party Service Provider or Financial Institution accounts which are being used by Defendants for the purpose of infringing on at least one claim of the Plaintiffs' Patent;

(12) Defendants and all financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to the Third Party

Service Provider(s) and the Financial Institution(s), subject to this Order may petition the Court to modify the asset restraint set out in this Order; and

(13) this Order and the Alternative Service Order shall remain in effect during the pendency of this action or until further order of the Court, and Plaintiff shall serve the Defendants with a copy of this Order in accordance with the Alternative Service Order.

B. IT IS HEREBY ORDERED, as sufficient cause has been shown, that upon Plaintiffs' request, any Internet marketplace who is provided with notice of this Order, including but not limited to the Third Party Service Providers and Financial Institutions, is hereby restrained and enjoined from engaging in any of the following acts or omissions pending the hearing and determination of Plaintiffs' Application for a preliminary injunction, or until further order of the Court:

(1) secreting, concealing, transferring, disposing of, withdrawing, encumbering or paying Defendants' Assets from or to financial accounts associated with or utilized by any Defendant or any Defendant's User Accounts or Merchant Storefront(s) (whether said account is located in the U.S. or abroad) ("Defendants' Financial Accounts") until further ordered by this Court; and

(2) within (5) days after receiving notice of this Order, providing services to Defendants, Defendants' User Accounts and Defendants' Merchant Storefronts, including, without limitation, continued operation of Defendants' User Accounts and Merchant Storefronts, and any other listings linked to the same sellers or linked to any other alias seller identification names being used and/or controlled by Defendants.

C. IT IS FURTHER ORDERED, as sufficient cause has been shown, that, upon Plaintiffs' request, within no later than five (5) calendar days of Plaintiffs' request:

(1) Amazon is ordered to remove any seller identified by Plaintiffs from the following Amazon Standard Identification Numbers (ASINs): B075KYV2DT (small BRISTLY[®]), B075L4L1T2 (medium BRISTLY[®]), and B075KTSHRT (large BRISTLY[®])⁶;

(2) Amazon is ordered to suspend any ASIN listing product that Plaintiffs assert infringes at least one claim of the Plaintiffs' Patent, and is identified as originating outside of the United States (i.e. any seller is prevented from listing for sale under the identified ASIN); and

(3) Amazon is ordered to suspend any ASIN that was associated with a product already identified by prior Order of this Court in the present lawsuit to be Counterfeit, Infringing, or unfairly competing, as designated in the Schedule A third column under "**Amazon ASIN Number(s)**" (i.e. any seller is prevented from listing for sale under the identified ASIN);

(4) The Plaintiff has demonstrated that the following products as pictured in the attached **Schedule "B"** are either made, used by, offered for sale or sold into the United States contain every element or equivalent of at least one claim of the Plaintiff's Patent; consequently, all online marketplaces, including but not limited to, amazon.com, ebay.com, aliexpress.com, and wish.com, shall upon receipt of this Order, suspend, block, tombstone, and/or delete any and any product listings identified by the Plaintiff as either identical or substantially similar, to the above-described products in **Schedule "B"**, whether sold by the Defendant or other persons or entities.

⁶ These are the current ASINs assigned to the Plaintiffs' Products by Amazon.

II. Order Authorizing Expedited Discovery

A. IT IS FURTHER ORDERED, as sufficient cause has been shown, that:

(1) Plaintiffs may propound interrogatories pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, and Defendants, their respective officers, employees, agents, servants and attorneys, and all persons in active concert or participation with any of them, who receive actual notice of this Order, shall provide written responses under oath to such interrogatories within fourteen (14) days of service to Plaintiffs' counsel.

(2) Plaintiffs may serve requests for the production of documents pursuant to FRCP 26 and 34, and Defendants, their respective officers, employees, agents, servants and attorneys, and all persons in active concert or participation with any of them, who receive actual notice of this Order, shall produce all documents responsive to such requests within fourteen (14) days of service to Plaintiffs' counsel.

(3) Plaintiffs may serve requests for admissions pursuant to FRCP 26 and 36, and Defendants, their respective officers, employees, agents, servants and attorneys, and all persons in active concert or participation with any of them, who receive actual notice of this Order, shall provide written responses under oath to such requests within fourteen (14) days of service to Plaintiffs' counsel.

B. IT IS FURTHER ORDERED, as sufficient cause has been shown, that within fourteen (14) days of receiving actual notice of this Order, Defendants and all financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to the Third Party Service Provider(s) and the Financial Institution(s), shall provide to Plaintiffs' counsel all documents and records in their

possession, custody or control (whether located in the U.S. or abroad) relating to Defendants' User Accounts and Defendants' Merchant Storefronts, including, but not limited to, documents and records relating to:

- (1) any and all User Accounts and Defendants' Merchant Storefronts and account details, including, without limitation, identifying information and account numbers for any and all User Accounts and Defendants' Merchant Storefronts that Defendants have ever had and/or currently maintain with the respective Third Party Service Provider;
- (2) the identities, location and contact information, including any and all e-mail addresses of Defendants that were not previously provided;
- (3) the Defendants' methods of payment, methods for accepting payment and any and all financial information, including, but not limited to, information associated with Defendants' User Accounts and Defendants' Merchant Storefronts, a full accounting of Defendants' sales history and listing history under such accounts and Defendants' Financial Accounts associated with Defendants' User Accounts and Defendants' Merchant Storefronts; and
- (4) Defendants' unauthorized and unlicensed use of Plaintiffs' Patent.

III. Security Bond

IT IS FURTHER ORDERED the \$5,000.00 bond posted by Plaintiff shall remain with the Court until a final disposition of this case or until further order of this Court, or until this Order is terminated.

SO ORDERED.

SIGNED this _____ day of May, 2022, at _____ .m.
Pittsburgh, Pennsylvania

MARK R. HORNAK
CHIEF UNITED STATES DISTRICT JUDGE

Schedule “A”

Defendants With Store Name and Seller ID

Defendant No.	Defendant/Store Name	Seller ID
1	COLORFLOWERS	A1CHEEQYGH8Y7I
2	A Inc	A3AUAZULT1L0G2
3	Aimdome	AB0JMVSVZ17DT
4	AMVEEDI	A3UL8PHXCHN7XR
5	Arestle Housewares	A2DQX4Y2AU5NFJ
6	Beshil	A1KATZXUD30X3X
7	BESTZYKJ	A6PTV1WFHC9KH
8	CHOUYUN	A4QI01VXT31RA
9	CHPODOO	A114HQGLDP5A2Q
10	Dailyitemss, Inc	A1VVNHE3Z24MN6
11	Dbzon	A18VWAUVNOAE1
12	dongguan shi shengke Technology Co., Ltd	AT55CQEWGG2X3
13	dplight	ANHVFG4Y08LUG
14	FairyCity	A1HXMMC8GQQ6HS
15	Flosik Toys	A3I4ISVGANTN01
16	Hshen	A2LQZW00C1HYQS
17	isenvo	A1NJGTQ24P9YM9
18	JAFVN FASHION	A34VQAVJCFH383
19	JiaYongJingMaoYouXianGongSi	A1IIAYXJJIBWFY
20	JoyofRelax	A12MBQBDGWESEQ
21	KingworaUS	A38ATRQ77SF83A
22	LiCraft US	A30110U88FHO2F
23	Lovfu	A17K815AD9ZTTC
24	Man Rui Department Store	A317OYCBPDILQD
25	MansWill	A392PFRJYHJ3WU
26	MIXX LABORATORY	A300MRWY3USLLF
27	MUJOUTDAY	A3F2S6YGW17B0G
28	NandaFer	A2EWQ42MAZ6IAP
29	nfddizayn	A2OK7J218QCUWB
30	PawfectDepot	A1P3UMLNCKPJL3
31	petfitt	A2NWIT8X6XNHXK
32	PETHOBBY RJ-shop	A9QHHC9N68KZV
33	PushMyCart	A2Q5N56LJMFPFC
34	ruidaxinxi	A2XNFLPPC13FEP
35	sankaragi-one	A1Z8T8Y2B8SVTU

36	shangkexinriyong	A3SRYQ8VZ22XJT
37	Sigoly	A3K6CJL6YEJSOG
38	Silva shop	AHVEPKDQOOQLS
39	situo	A29OZITDKFQWF2
40	SONGWAY Pet	A33EWE5YZEAYTR
41	sunneli	AN5Q1N46JVHOC
42	Tangnert	A5QF46EEJ0KU5
43	Teenway	A375NEJ8P0ELM
44	The Neighbor's Store	A1UGGHD4U8VXIP
45	ToBe-Unique	A3FQ48J53DINFC
46	wanen	A3CBY6BREN9258
47	WGGH	A32OUA9LYBM2WH
48	WNWZZ	A2SGY75D4DNOEY
49	WuHanChaoYouKuaJingDianZiShangWuYouXianGongSi	A35MK5ML95FWSG
50	Z-Grobal	AJMX49V6J8AWX
51	Ali ceiling Store	1100034150
52	Aliexpress Good Kitchen Assistant Store	911116188
53	Animalhouse Store	912638012
54	Aniya life Store	2963253
55	Boutique life Store	5710093
56	COZY Style Store	1100026068
57	cuddly Store	912615520
58	Dai Department Store	900242204
59	Detian Store	911052029
60	Doggiefun Store	911324133
61	Dogi Pet supplies Store	2662136
62	DZOMNOK Store	912603111
63	Eruzaray Living Store	910883017
64	EverChic Such-Life Store	5873388
65	FCXDG PetsLife Store	5785603
66	firry living store	912613339
67	FUTUSHIJIE Store	912468600
68	Happiness supermarket Store	911754695
69	HJKL PetsLife Store	5890601
70	HowardHOME Store	3054066
71	HYXFly House Store	5786980
72	iPGY Store	9172724155
73	IT AND ME Pet Store	5589428
74	JMshop Store	912491405
75	JSQQ Store	912461372
76	matsofamic Pet Official Store	5888942
77	MHORLX Store	5477101
78	MS HLHW01 Store	910940035
79	MS HLHW02 Store	910946009
80	MS HLHW03 Store	910940025

81	New Life Products Store	5722163
82	PetitPet Store	912639184
83	PICK PET Official Store	812394176
84	Shop110006051	1100006051
85	Shop1100178032 Store	1100178032
86	Shop4233035 Store	4233035
87	Shop5431295 Store	5431295
88	STAO Store	912617903
89	taotaoPet Store	910716066
90	Tastybone Store	911747333
91	two L Store	912625688
92	Yang168 Store	911664179
93	YCloud Pet Store	3791001
94	Yiwu lingchong pets Store	910355076
95	YOKEE PET Store	1100227574
96	4ontherrun	255379382067, 254384699417
97	alittlethings-xumu	174405730507
98	angela_hff78	164702632772
99	anmel-9921	194870582727
100	appretzmedia	143809700912
101	arelyangellaurent	174458567090
102	averhaye-0	284375863329
103	aykewa0	234484558749
104	beauty.box	234404494614, 234404424780
105	bellas_pawtique	402642633401
106	bestonlineshops	224867154647
107	betocorona37	124998500714
108	camgamesales	185260277144
109	cha_g2gyvk	333808505409
110	chun_8594	313757412136
111	citru_5625	334313764893, 334323369194
112	dantress	264833862715
113	dayon_60	313760153022
114	dayton_ohio	124467557643, 124762784355
115	dedagirl	175220415872
116	djpetstore	174325058265
117	dmg30	165282013776, 165282043279, 165282015725
118	dtmgoods	353357589402
119	dulanjana87	353737615156

120	edinessboss	255448183034
121	emily154	254477209873
122	enrikastore	353099667296
123	epicesolutions	284663761289
124	euphoriahm	133679747356
125	fagu7386	154706263292
126	focus-parts	284328765295
127	foreveryoung377	265527688376
128	gitterm123	274970577144, 274976556693, 274974263815, 274973718199, 284284261270
129	gndealz	174540145632, 174356319741
130	goodedealsnogales	313922230715, 313876093404
131	happlyoneday	313257206314
132	happydeal-mall	284226137598
133	honggang2019-1	124662746277
134	how-1514	353966067735
135	idydz accessories	133426095115
136	iiix_tream	224214400263
137	iluzion69	133533018683
138	iront7624	185174559039
139	jacbo_9711	143674610051, 143625784070, 144448237204
140	jb2010-2012	115260014480
141	jennlyne2	265613708833, 265613708777
142	joshboysgaming	203871510258
143	jrte-2662	363252608698, 363626835708
144	jsgm17	244093567467
145	jtaylor3344	284612142202, 284612020271
146	katjuus	233867945874
147	kclu_30	403368061967
148	keithbates2012	184530085450
149	kidon2014	185320227340
150	leading-wireless	133886313394
151	lem_5142	384775927641
152	liuming79	234248146335

153	mart-2216	384510856477
154	mebr007	114465509009
155	miami98	114374225190
156	minaudas	174888472904
157	mucerio7788	363395400635
158	mustang692010	174878430466
159	nalindsilv 0	144129545370
160	nics_naxx	313883381910
161	nighacollection	114934256082, 125230221696
162	northerncomm 33	392799120144
163	notw92345	154429310988
164	palplaza	313804045988
165	peaceful62	233696118052
166	phkasi0	363777326557
167	primetime distribution	363502614033
169	princessx4	124633382825
170	progunzxz	174527268723
171	purs 81	203246977431, 203270424277
172	qiren32	234293588204
173	rayshop90	165296166443
174	rohan e mart	164469390838
175	rschlapp	333584313317
176	sandys_place 10	384443583760
177	savaglo-15	224847984923
178	scraggy99	175115547966
179	shellbeal	324701739014, 324697075176
180	shop-mida	265379767639
181	slickzthings4u	265145061621
182	smartbuystore 01	294549740661
183	smartgoals	352804457606
184	soletgo	124545866212, 124805155459, 124805227058
185	stevenatin-0	403481321213
186	suaznavarshop2	325024327040
187	ta-558789	384509268535
188	texmedusa	363628183408
189	twelve*29	402888681195
190	unepart	115099491104
191	universeabc	234240804700
192	vickie7772	193853725636

193	wa321849	4033636879302
194	wanted2017	164864504563
195	xinhao34	393710186174
196	zh5682	384507251218
197	fablab	5d58df0540defd5641acb0fd
198	gxbdyxgs	5d5d10b82736783ea8e269b1
199	shenzhendayanghuixinkejiyougongsi	57c7a2930ec9b42c8afbdab5
200	woniuniu	5f40003acacdc1474faea18f
201	xiazimeizhuang	5b39b18e48fca93fef98276e
202	ywgsyouth0410	59f86355dc7a9145d9dff550

**Schedule “B”
Patent Infringing Products**

Type 1 Infringing Product



Type 2 Infringing Product



Type 3 Infringing Product



Type 4 Infringing Product



Type 5 Infringing Product



Type 6 Infringing Product

