

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

AQUAPAW BRANDS LLC,
Plaintiff,

v.

JOYI YAN,
ANYANGSHILAICHUANGSHANGMA
OYOUXIANGSHI, AREN'S
COMPREHENSIVE CENTER,
AUTHENTIDY, BOQIN2022, C-ZHAN
SHOP, DAQIAN SHIJIE, DUO-YX,
DYSMZSK, ERA STORE, GAZECHIMP,
HYMS, K_IMPORTS, KUIKUI
TRADING,
LAOBAMIZHIXIAOHANBAO,
LBYZSZL, LOIQKAKQ, MEEJIE
CLEANING, MERIC PET
ACCESSORIES, MINGBAOGOU,
MINOVE, MISOONGO, MXM STORE,
PEVHSVZ US, RVOKOMS DIRECT,
SHENGXIN TRADE – USA, SUNNIMIX,
TBSM, TIANLIANGPIJU, UKOOUS,
WANBINSHANGMAO, WEBEEDY US,
WEI HAO, XINGYI-US,
YANGQINGYU, YESTONDIRECT-US,
YIWUSHIDUIJIAOXIANDIANZISHAN
GWUYOUXIANGONGSI, YMYMEIZ,
YOUR DQ, YOUR FIRST MARKET,
YUHOO-US, ZHIXUE LIU, A
WONDERFULLY STORE, ATUBAN
PETS STORE, BEAUTHOME STORE,
CHANDLER-FUL STORE,
CREATEYOURLIFE STORE, DOGCAT
PETS STORE, ELIFE LOVEPET STORE,
FEVER 2 STORE, FUTURE HOUSE
STORE, GENERAL UTILITY TOOL
STORE, HOMPY POPPY STORE,
HOUZIME STORE, HYSAIXIA
PETLAND STORE, INTERESTING
LIFESTYLE STORE, LUCKY PETS
STORE, MAIDEHAO STORE, MEOWU
STORE, MINGO LIFE STORE,

Civil Action No.

FILED UNDER SEAL

MOONBIFFY HIGH QUALITY PET
STORE, NATURE HOME STORE,
NICREW CATS & DOGS STORE,
OUYES PET LIFE STORE, PET LOVE
STORE, PETS HOME STORE, PINZE EC
CO., LTD. STORE, PPIT STORE,
PUPPYSTAR PETS WARM LIFE
STORE, SEEYEA STORE,
SHOP1102094194 STORE, SHUJIE
OFFICIAL STORE, SOFIA LIFESTYLE
STORE, TRIPLE-NICE STORE, WSEYU
STORE, XIAO9A STORE, XIAO9B
STORE, YOUJIA KITCHEN SUPPLIES
STORE, YOUOOL HOMETOWN DROP
SHOPPING STORE, YY-PET STORE,
ZEZZO GADGETS STORE, ZJMZYM
DAILY-USE SUNDRY GOODS STORE,
5JAYDE, 904WILL29, ACHMADHU_99,
ADIP45, AMANANAY4, AN-844627,
ATLANTA1, AUTISMMOM1440,
BERMUDATREASURES,
BEST4PURCHASE,
BLUEVALLEYASSETS,
BOASSEENONTV, BUBBAGRGRV,
BUTLE-MARY, BUY-FROM-ME.DEAL,
CHANUKAMALINDAJAYASINGHE,
CHARLIEROCK79, CHENM_2270,
CHERRYONE13, CLUXTON40,
COMFO26, COSHE-7870,
DEENCOLLECTIONS, EZCARTLLC1,
FEHAT-53, GAJINDKULASINGH_0,
GALORENMORE,
GENCOORGANICS_1, GIGHANN-0,
GOCARTGO,
GOINGOUTOFBUSINESS100, HBJ-
ENTERPRISES, HOBOJOE420,
IMONKEYSLLC, INDJAYAT-87,
INNERETHEREALBOX, J_MURREL-6,
JACKSBARGAINBIN,
JAGATHEXPOT_77, JANAKARAJ5,
JASBAR_8039, JDRESALES, JIVAN-
IMPEX, JTS_NIFTY_THRIFTIES,
JUJUE_BEAN, KABI_MART,
KAVINDUD77, KAVLAK-40,
KELLEIGH-1, LOYALTYDRESS,
MANGRIDD, METE7298, MIK.FREDR,

MKFAMILYFARMSTEADLLC,
MSONIC8017, NILANGIKA,
PERSONALIZEDPRODUCTS4U,
PRACTICAL.CHOICES,
PRAMONO2015,
PREMIUM_PRODUCT_UK,
REDBERRY-0515, RESELLERS_KM,
RIZMANERY, SARATHOM-46,
SEZMEY-0, SHOPLC-US, SUNETH2002,
SUPERORNOT, TECHMAR64,
TIMOTHMCCUBBIN0,
TRANDETREE007US,
TREASURE_HUNTER_68,
TWIGISTORE_09, YALGOPALA_0,
YOYO19752009, BHOOK DIRECT,
EVEREST VENTURES, INTEGO
NUTRITION, MENOLANA,
SHANGHAIAANTUOWANGLUOKEJIYO
UXIANZERENGONGSI,
SHENZHENSHIJIUCHENMAOYIYOUX
IANGONGSI, SHINE ASLOA
INVESTMENT TRADE INC, SHOP LC,
SIPINGSHI ZHONGLIAN KEJI
YOUXIANGONGSI, VANJUNN,
WEVOVE, XUNMALL CO., LTD,
ADYTUTIP, AINOLWAY, ANSHIBO,
CCL1, ETTIYOT, FANGBIAO1994,
FEIYU TEXTILE, FIRSTGLASS,
FLYGEAR, GROWUPLYZ, HUASONG,
LANXIULONG'S STORE, LOVESH,
MENGMENG2457, MY SMILE POWER,
POO FOXX, SANYAJU, SHOPLC,
SULEM, TAO DUO DUO NAN
ZHUANG, TRILIGHTING, TUNG1964,
XIAOTINGMEIMEISHIPIN,
XIONGLIMEI, YETOOOO, AND
YQBUIZAIPA,

Defendants.

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

AQUAPAW BRANDS LLC, a Delaware limited liability company (“Plaintiff”), hereby sues Defendants, the Individuals, Partnerships, and Unincorporated Associations identified in the Caption and which are set forth in **Schedule “A”** hereto (collectively “Defendants”). Defendants have willfully infringed one or more of the claims of U.S. Patent No. 10,531,728 (“Plaintiff’s Patent” or “the Plaintiff’s Patent”) by offering for sale, selling, and distributing knock-off versions of Plaintiff’s Aquapaw® Pet Bathing Tool (“Infringing Products”). In support of their claims, Plaintiff allege as follows:

NATURE OF THE ACTION

1. Michael Scotese is an executive of the Plaintiff company, AQUAPAW BRANDS LLC, the 100% owner of all the assets of AQUAPAW LLC, the original company that developed and marketed the product at issue in this case (i.e., the Aquapaw® Pet Bathing Tool). The inventor of the Plaintiff’s patented product solved the challenging problem of bathing a dog by examining the task from the dog’s perspective. By creating a sprayer/scrubber operable by one hand, the inventor was able to hold and comfort the dog with the free hand while cleaning the pet with the device. Today, the product is sold by Plaintiff under the brand name Aquapaw® Pet Bathing Tool (“Plaintiff’s Product”).

2. Defendants have offered for sale, sold, and distributed knock-off versions of the Plaintiff’s Product which infringe at least one claim of the Plaintiff’s Patent. Moreover, Defendants’ sale, distribution, and advertising of the Infringing Product are highly likely to cause consumers to believe that Defendants are offering a genuine version of Plaintiff’s Product when they are not.

3. Shown below are the example types of Infringing Product offered for sale by the Defendants:

TYPE 1 INFRINGING PRODUCT



TYPE 2 INFRINGING PRODUCT



4. As poorly designed and manufactured products, Defendants' Infringing Products may injure an unsuspecting pet that tries to ingest it; likewise, the flimsiness of the product may disappoint a customer who may give the product a bad review.

5. Defendants' Infringing Products are substantially inferior to the genuine product. With poorly designed and manufactured products, Defendants' Infringing Products create serious

public safety risks and threaten to destroy the reputation of high quality that Plaintiff's Products have earned.

6. Plaintiff's Product is marketed and advertised extensively including on its website aquapaw.com and its storefront on Amazon.com. The unique features of Plaintiff's Product and the manner in which it is marketed and advertised, including, the distinct photographs, the design, the instructions, the packaging, and the unique presentation of the product, all comprise Plaintiff's valuable intellectual property ("IP") and all have become distinct in consumer's minds such that consumers associate all of this IP with Plaintiff's Product. Screenshots from Plaintiff's Website and Amazon Store are attached as Complaint Exhibit 1.

7. The innovative features of Plaintiff's Product are the subject of U. S. Patent No. 10,531,728 entitled "Hand Attachable Animal Washing Apparatus". A copy of the patent is attached as Complaint Exhibit 2. The Plaintiff's Product is marked in accordance with the Patent Act.

8. On information and belief, Defendants' sale of Infringing Products gives rise to a plausible expectation that discovery will reveal that Defendants' actions all arise from the same transaction, occurrence, or series of transactions. Specifically, on information and belief, Defendants are actively participating in a conspiracy to distribute and sell Infringing Products. For example, Defendants, on information and belief, are working together to manufacture, arrange the manufacture of and/or sell and otherwise distribute the Infringing Products. Moreover, the Infringing Products all infringe on at least one claim of the Plaintiff's Patent and the Infringing Products are the same or substantially similar products.

9. Plaintiff therefore brings this action for Patent Infringement under 35 U.S.C. § 271, and The All Writs Act, 28 U.S.C. § 1651(a).

JURISDICTION AND VENUE

10. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338.

11. This Court may exercise personal jurisdiction over a non-resident of the State in which the Court sits to the extent authorized by the state's laws. Fed. R. Civ. P. 4(e). Pennsylvania authorizes personal jurisdiction over each Defendant pursuant to 42 Pa. Cons. Stat. § 5322 (a) which provides in pertinent part: “A tribunal of this Commonwealth may exercise personal jurisdiction over a person ... as to a cause of action or other matter arising from such person: (1) Transacting any business in this Commonwealth. Without excluding other acts which may constitute transacting business for the purpose of this paragraph: (ii) The doing of a single act in this Commonwealth for the purpose of thereby realizing pecuniary benefit ... (3) Causing harm or tortious injury by an act or omission in this Commonwealth. (4) Causing harm or tortious injury by an act or omission outside this Commonwealth ... (10) Committing any violation within the jurisdiction of the Commonwealth of any statute, home rule charter, local ordinance or resolution, or rule or regulation promulgated thereunder by any government unit or of any order of court or other government unit.” In the alternative, Federal Rule of Civil Procedure 4(k) confers personal jurisdiction over the Defendants because, upon information and belief, Defendants regularly conduct, transact and/or solicit business in Pennsylvania and in this judicial district, and/or derive substantial revenue from their business transactions in Pennsylvania and in this judicial district and/or otherwise avail themselves of the privileges and protections of the laws of the Commonwealth of Pennsylvania such that this Court's assertion of jurisdiction over Defendants does not offend traditional notions of fair play and due process, and/or Defendants' illegal counterfeiting and infringing actions caused injury to Plaintiff in

Pennsylvania and in this judicial district such that Defendants should reasonably expect such actions to have consequences in Pennsylvania and in this judicial district, for example:

a. Upon information and belief, at all times relevant hereto, Defendants were and/or are systematically directing and/or targeting their business activities at consumers in the United States, including Pennsylvania, through on-line platforms with Merchant Storefronts (as defined *infra*), via on-line marketplace websites, such as Amazon.com, eBay.com, Aliexpress.com, Walmart.com, and Wish.com, under the Seller IDs, as well as any and all as yet undiscovered accounts with Merchant Storefronts held by or associated with Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them (“User Accounts”), through which consumers in the United States, including Pennsylvania, can view the one or more of Defendants’ Merchant Storefronts that each Defendant operates, uses to communicate with Defendants regarding their listings for Infringing Products and to place orders for, receive invoices for and purchase Infringing Products for delivery in the U.S., including Pennsylvania, as a means for establishing regular business with the U.S., including Pennsylvania.

b. Upon information and belief, certain Defendants are sophisticated sellers, each operating one or more commercial businesses using their respective User Accounts through which Defendants, their respective officers, employees, agents, servants and all persons in active concert of participation with any of them, operate storefronts to manufacture, import, export, advertise, market, promote, distribute, offer for sale and/or otherwise deal in products, including the Infringing 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 (“Merchant Storefront(s)”) in wholesale quantities at significantly below-market prices to consumers worldwide, including to those in the U.S., and specifically Pennsylvania.

c. Upon information and belief, Defendants’ Merchant Storefronts reflect multiple sales to consumers all over the world, including repeat sales to consumers in the U.S. and into this judicial district.

d. Upon information and belief, all Defendants accept payment in U.S. Dollars and offer shipping to the U.S., including to Pennsylvania.

e. Upon information and belief, at all times relevant, Defendants have transacted business with consumers located in the U.S., including Pennsylvania, for the sale and shipment of Infringing Products.

f. Upon information and belief, some Defendants are employing and benefiting from substantially similar, paid advertising and marketing and advertising strategies in order to make their Merchant Storefronts selling illegal goods appear more relevant and attractive to search result software across an array of search words, including but not limited to “PET SPRAYER”, “DOG SPRAYER”, AND “PET BATHING TOOL”. By their actions, Defendants are causing concurrent and indivisible harm to Plaintiff and the consuming public by (i) depriving Plaintiff of their right to fairly compete for space within the various on-line marketplace search results and reducing the visibility of the Plaintiff’s Product on various on-line marketplaces and/or diluting and driving down the retail market price for the Plaintiff’s Product (ii) causing an overall degradation of the value of the goodwill associated with Plaintiff’s Product; and (iii) increasing Plaintiff’s overall cost to market its goods and educate consumers about its brand and products.

g. Upon information and belief, Defendants have cooperated, communicated their plans with one another, shared information, purchased their infringing products from the same source, and coordinated their efforts, all in order to create an illegal marketplace operating in parallel to the legitimate marketplace of Plaintiff's and the legally authorized resellers of Plaintiff's genuine goods.

h. Upon information and belief, Defendants are concurrently targeting their infringing activities toward consumers and causing harm in Allegheny County, Pennsylvania.

i. Upon information and belief, Defendants likely reside and/or operate in and/or (in the case of US-based sellers) purchase from foreign jurisdictions with lax trademark and patent enforcement systems and are cooperating by creating an illegal stream of infringing and counterfeit goods.

j. Upon information and belief, Defendants are aware of Plaintiff, its genuine Aquapaw[®] Pet Bathing Tool, and are aware that their illegal infringing actions alleged herein are likely to cause injury to Plaintiff in the United States, in Pennsylvania and in this judicial district specifically, as Plaintiff conducts substantial business in Pennsylvania.

k. Plaintiff is suffering irreparable and indivisible injury and suffered substantial damages as a result of Defendants' unauthorized and wrongful sale of infringing goods.

12. Venue is proper, *inter alia*, pursuant to 28 U.S.C. § 1391 because, for example:

a. Upon information and belief, Defendants conduct, transact, and/or solicit business in this judicial district.

b. Upon information and belief, Defendants or their agent(s) may be found in this district because personal jurisdiction is proper in this district.

c. Upon information and belief, this is a judicial district in which a substantial part of the events or omissions giving rise to the infringement claims occurred, or a substantial part of the property that is the subject of the action is situated.

d. Defendants not resident in the United States may be sued in this judicial district because personal jurisdiction is proper in this district.

THE PLAINTIFF

13. Plaintiff, AquaPaw Brands LLC, is a Delaware limited liability company and has its principal place of business at 113 Cherry Street, PMB 89249, Seattle, Washington 98104-2205 U.S.

14. Plaintiff is, in part, engaged in the business of manufacturing and distributing throughout the world, including within this district, the Aquapaw[®] Pet Bathing Tool, through its website, aquapaw.com, its authorized storefront on amazon.com, and various retail establishments. Defendants, through the sale and offer to sell Infringing Products are directly, and unfairly, competing with Plaintiff's economic interest in the Commonwealth of Pennsylvania and causing Plaintiff harm within this jurisdiction.

15. Like many other brand owners, Plaintiff suffer ongoing daily and sustained violations of their rights at the hands of infringers, such as Defendants herein, who wrongfully reproduce Plaintiff's Products for the twin purposes of (i) duping and confusing the consuming public and (ii) earning substantial profits from the sale of their Infringing Products. The natural and intended byproduct of Defendants' actions is the erosion and destruction of the goodwill

associated with Plaintiff's Products and the destruction of the legitimate market sector in which Plaintiff operate.

16. The recent explosion of counterfeiting and infringement over the Internet, including through online marketplace platforms, has created an environment that requires brand owners, such as Plaintiff, to expend significant time and money across a wide spectrum of efforts in order to protect both consumers and Plaintiff from the ill effects of confusion and the erosion of the goodwill associated with Plaintiff's brand and products.

THE DEFENDANTS

17. The Defendants are individuals and/or business entities of unknown makeup, each of whom, upon information and belief, either reside or operate in foreign jurisdictions, or (though not foreign)¹ redistribute products from the same or similar sources in those foreign locations. Defendants have the capacity to be sued pursuant to Federal Rule of Civil Procedure 17(b). Defendants target their business activities toward consumers throughout the United States, including within this district, and conduct pervasive business through the operation of one fully interactive commercial Internet based e-commerce store via, at least one of the Internet based

¹ Prior to filing this lawsuit, Plaintiff viewed a public seller profile that is published by each Defendant's Amazon.com storefront that purports to identify the name and address of the Defendant. Solely based upon their representation on their Amazon.com storefronts, the following defendants have identified themselves as US-based and are not at this time alleged to be foreign sellers 5jayde, 904will29, adip45, atlanta, Authentidy autismmom1440, bermudatreasures, bluevalleyassets, boasseenontv, bubbagrgrv, butlemary, buy-from-me.deal, charlierock79, cluxton40, comfo26, coshe-7870, deencollections, ezcartllc1, fehats53, galorenmore, gighann-0, gocartgo, hobojoe420, imonkeysllc, inneretherealbox, Intego Nutrition, j_murrell6, jasbar_8039, jdresales, jts_nifty_thrifties, jujue_bean, K_IMPORTS, kelleigh-1, loyaltydress, Meric Pet Accessories, mete7298, mik.fredr, mkfamilyfarmsteadllc, MiNove, MXM Store, personalizedproducts4u, practical.choices, premium_product_uk, resellers_km, rizmanery, sarathom-46, Shine Asloa Investment Trade Inc, Shop LC, shoplc-us, superornot, techmar64, timothmccubbin0, treasure_hunter_68, Your First Market, yoyo19752009.

online marketplaces, Amazon.com, eBay.com, Aliexpress.com, Walmart.com, and Wish.com, all under the Seller IDs.

18. Upon information and belief, the Defendants use aliases in conjunction with the operation of their businesses as set forth in Schedule “A” hereto.

19. Defendants are the past and present controlling forces behind the sale of products infringing at least one claim of the Plaintiff’s Patent described herein using at least the Seller IDs.

20. Upon information and belief, Defendants were willfully advertising, offering for sale and selling goods infringing upon at least one claim of the Plaintiff’s Patent to consumers within the United States and this district through several fully interactive, commercial Internet websites and Internet based e-commerce stores operating under, at least one of the Amazon.com, eBay.com, Aliexpress.com, Walmart.com, and Wish.com storefronts, the Seller IDs, and any additional domain names, websites and corresponding website URLs or seller identifications and store URL aliases not yet known to Plaintiff. Defendants have purposefully directed some portion of their illegal activities towards consumers in the Commonwealth of Pennsylvania through the advertisement, offer to sell, sale, and/or shipment of Infringing Products into the Commonwealth.

21. Defendants have registered, established or purchased, and maintained the on-line marketplace website storefronts and Seller IDs. Upon information and belief, Defendants have engaged in fraudulent conduct with respect to the registration of the storefronts and Seller IDs by providing false and/or misleading information to the Internet based e-commerce platforms where they offer for sale and/or sell, during the registration or maintenance process related to their

respective Seller ID. Upon information and belief, Defendants have anonymously registered and maintained some of the Seller IDs for the sole purpose of engaging in illegal infringing activities.

22. Upon information and belief, Defendants will continue to register or acquire new seller identification aliases for the purpose of selling and offering for sale goods infringing at least one claim of the Plaintiff's Patent unless preliminarily and permanently enjoined.

23. Defendants' Internet-based businesses amount to nothing more than illegal operations established and operated in order to infringe the intellectual property rights of Plaintiff.

24. Defendants' business names, i.e., the Seller IDs, associated payment accounts, and any other alias seller identification names used in connection with the sale of goods infringing on at least one claim of the Plaintiff's Patent are essential components of Defendants' online activities and are the means by which Defendants further their infringement scheme and cause harm to Plaintiff.

COMMON FACTUAL ALLEGATIONS

Plaintiff and Its Innovative Aquapaw® Pet Bathing Tool

25. The Plaintiff's Product is an innovative wearable sprayer-scrubber combination that easily connects to a garden hose or faucet and permits the owner to operate the device with one hand while they hold their pet firmly with the other hand. The Plaintiff's Product, pictured below, retails for \$24.95:



26. On January 14, 2020, the U.S. Patent and Trademark Office issued the '728 patent, the claims of which protect Plaintiff's Product. The Plaintiff's Patent has never been assigned or licensed to any of the Defendants in this matter. Plaintiff has provided constructive notice of the Plaintiff's Patent by placing the patent number of the patent on the packaging of Plaintiff's Product. Plaintiff's patent marking is also accomplished on its web site at <https://www.aquapaw.com/pages/patents> (last visited September 13, 2022).

27. Plaintiff's Product has been featured in videos or articles by numerous media outlets, including: NBC's "The Today Show"; "Shark Tank", QVC, Business Insider, Ace Hardware Store, BuzzFeed, and Country Living. Plaintiff's Product has won numerous awards, including: Editor's Choice Awards *Pet Product News* 2017 Winner, *Pet Business* 2017 Industry Recognition Award Winner, and *Global Pet Expo*, Best in Show, Dog Company.

Defendants' Wrongful and Infringing Conduct

28. Upon information and belief, Defendants are, through at least the Internet based e-commerce stores operating under the Seller IDs on Amazon.com, eBay.com, Aliexpress.com, Walmart.com, and Wish.com, promoting, selling, offering for sale and distributing goods that willfully infringe at least one claim of the Plaintiff's Patent while marketing their knock-off

products in a willful attempt to pass off their knock-off products as the genuine version of Plaintiff's Products.

29. Upon information and belief, Defendants' Infringing Products are of a quality substantially and materially different than that of Plaintiff's genuine goods. Defendants, upon information and belief, are actively using, promoting and otherwise advertising, distributing, selling, and/or offering for sale substantial quantities of their Infringing Products with the knowledge and intent that such goods will be mistaken for the genuine high quality goods offered for sale by Plaintiff despite Defendants' knowledge that they are without authority to use the subject matter of the Plaintiff's Patent.

30. Defendants advertise their Infringing Products for sale to the consuming public via Internet based e-commerce stores on, at least, one Internet marketplace on Amazon.com, eBay.com, Aliexpress.com, Walmart.com, and Wish.com, using at least the Seller IDs. In so advertising these goods, Defendants improperly and unlawfully infringe at least one claim of the Plaintiff's Patent without Plaintiff's permission.

31. As part of their overall infringement scheme, Defendants are, upon information and belief, concurrently employing and benefitting from substantially similar, advertising and marketing strategies based, in large measure, upon an illegal use of infringements of the Plaintiff's Patent in order to make their e-commerce stores selling illegal goods appear more relevant and attractive to consumers online. By their actions, Defendants are contributing to the creation and maintenance of an illegal marketplace operating in parallel to the legitimate marketplace for Plaintiff's genuine goods. Defendants are causing, individual, concurrent and indivisible harm to Plaintiff and the consuming public by (i) depriving Plaintiff and other third parties of their right to fairly compete for space within search engine results and reducing the

visibility of Plaintiff's genuine goods on the World Wide Web, (ii) causing actual consumer confusion, (iii) harm to Plaintiff's reputations, including tarnishing their status as the innovator in this market, (iv) an overall degradation of the value of the goodwill associated with the Plaintiff's brand, and (v) increasing Plaintiff's overall cost to market its goods and educate consumers about its brand via the Internet.

32. Plaintiff confirmed that Defendants were and/or are still currently offering for sale and/or selling Infringing Products for sale to the consuming public via Internet based e-commerce stores on at least one of the Internet marketplaces, Amazon.com, eBay.com, Aliexpress.com, Walmart.com, and Wish.com using at least the Seller IDs and that Defendants provide shipping and/or have actually shipped Infringing Products to customers located within this judicial district.

33. There is no question that the Infringing Product itself and the manner in which it is marketed is designed to confuse and mislead consumers into believing that they are purchasing Plaintiff's Product or that the Infringing Product is otherwise approved by or sourced from Plaintiff, thereby trading on the goodwill and reputation of Plaintiff.

34. Upon information and belief, at all times relevant hereto, Defendants in this action had full knowledge of Plaintiff's ownership of the Plaintiff's Patent. Defendants' use of the patent is without Plaintiff's consent or authorization.

35. Defendants are engaging in the above-described illegal infringing activities knowingly and intentionally or with reckless disregard or willful blindness to Plaintiff's rights for the purpose of infringing the Plaintiff's Patent and trading on Plaintiff's goodwill and

reputation. If Defendants' intentional infringing activities are not preliminarily and permanently enjoined by this Court, Plaintiff and the consuming public will continue to be harmed.

36. Defendants' above identified infringing activities are likely to cause confusion, deception, and mistake in the minds of consumers before, during, and after the time of purchase. Moreover, Defendants' wrongful conduct is likely to create a false impression and deceive customers, the public, and the trade into believing there is a connection or association between Plaintiff's Products and Defendants' Infringing Products, which there is not.

37. Upon information and belief, Defendants' payment and financial accounts are being used by Defendants to accept, receive, and deposit profits from Defendants' infringing activities connected to their Seller IDs and any other alias e-commerce stores, photo albums, seller identification names, domain names, or websites being used and/or controlled by them.

38. Further, upon information and belief, Defendants are likely to transfer or secret their assets to avoid payment of any monetary judgment awarded to Plaintiff.

39. Plaintiff has no adequate remedy at law.

40. Plaintiff is suffering irreparable injury and have suffered substantial damages as a result of Defendants' unauthorized and wrongful infringement of at least one claim of the Plaintiff's Patent. If Defendants' infringing activities are not preliminarily and permanently enjoined by this Court, Plaintiff and the consuming public will continue to be harmed.

41. The harm and damages sustained by Plaintiff has been directly and proximately caused by Defendants' wrongful reproduction, use, advertisement, promotion, offers to sell, and sale of their Infringing Products.

COUNT I – PATENT INFRINGEMENT (35 U.S.C. § 271 (a))

42. The allegations in the above paragraphs are hereby incorporated by reference.

43. Plaintiff owns U. S. Patent No. 10,531,728 entitled “Hand Attachable Animal Washing Apparatus”. A copy of the patent is attached as Complaint **Exhibit 2**. The Plaintiff’s Product is marked in accordance with the Patent Act.

44. The Accused Products Type 1 and 2 infringe at least Claim 1 of the Plaintiff’s Product, as more fully detailed in **Exhibits 3 and 4**, respectively.

45. Defendants have infringed and continue to infringe the Plaintiff’s Patent either directly or indirectly through acts of contributory infringement or inducement in violation of 35 U.S.C. § 271, by making, using, selling, importing and/or offering to sell Infringing Products, namely the knock-offs that infringe at least one claim of the Plaintiff’s Patent.

46. Defendants’ infringement, contributory infringement and/or inducement to infringe has injured Plaintiff and they, therefore, is entitled to recover damages adequate to compensate it for such infringement, but in no event less than a reasonable royalty.

47. Defendants’ infringement, contributory infringement and/or inducement to infringe has been willful and deliberate because Defendants have notice of or knew of the Plaintiff’s Patent and have nonetheless injured and will continue to injure Plaintiff, unless and until this Court enters an injunction, which prohibits further infringement and specifically enjoins further manufacture, use, sale, importation and/or offer for sale of products or services that come within the scope of the Plaintiff’s Patent.

48. Based on Defendants’ wrongful conduct, Plaintiff is entitled to injunctive relief as well as monetary damages and other remedies as provided by the Patent Act, including damages that Plaintiff has sustained and will sustain as a result of Defendants’ illegal and infringing

actions as alleged herein, enhanced discretionary damages and reasonable attorneys' fees and costs.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment on all Counts of this Complaint and an award of equitable relief and monetary relief against Defendants as follows:

a. Entry of temporary, preliminary and permanent injunctions pursuant to 35 U.S.C. § 283, and Federal Rule of Civil Procedure 65 enjoining Defendants, their agents, representatives, servants, employees, and all those acting in concert or participation therewith, from manufacturing or causing to be manufactured, importing, advertising or promoting, distributing, selling or offering to sell their Infringing Products;

c. Entry of an Order that, upon Plaintiff's request, any Internet marketplace website operators and/or administrators that are provided with notice of the injunction, including but not limited to the online marketplaces Amazon.com, eBay.com, Aliexpress.com, Walmart.com, and Wish.com, identify any e-mail address known to be associated with Defendants' respective Seller ID, and cease facilitating access to any or all e-commerce stores through which Defendants engage in the promotion, offering for sale, and/or sale of Infringing Products.

d. Entry of an Order that, upon Plaintiff's request, any Internet marketplace website operators and/or administrators who are provided with notice of the injunction, including but not limited to the online marketplaces Amazon.com, eBay.com, Aliexpress.com, Walmart.com, and Wish.com, permanently remove any and all listings offering for sale Infringing Products via the e-commerce stores operating under the Seller IDs, including any and all listings linked to the

same seller or linked to any other alias seller identification name being used and/or controlled by Defendants to promote, offer for sale and/or sell Infringing Products.

e. Entry of an Order that, upon Plaintiff's request, any Internet marketplace website operators and/or administrators who are provided with notice of the injunction, including but not limited to the online marketplaces Amazon.com, eBay.com, Aliexpress.com, Walmart.com, and Wish.com, immediately cease fulfillment of and sequester all goods of each Defendant or other Seller under a Seller ID offering for sale the Infringing Product in its inventory, possession, custody, or control, and surrender those goods to Plaintiff.

f. Entry of an order awarding Plaintiff damages adequate to compensate for the infringement of its patent, but in no event less than a reasonable royalty for the use made of the invention by the Defendants, together with interest and costs as fixed by the Court pursuant to 35 U.S.C. § 284 and that the award be trebled as provided for under 35 U.S.C. §284.

g. Entry of an Order finding that this case is exceptional and an award to Plaintiff of its attorney fees and costs as provided by for under 35 U.S.C. § 285.

h. Entry of an Order that, upon Plaintiff's request, any financial institutions, payment processors, banks, escrow services, money transmitters, including, but not limited to, 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")², Amazon Payments, Inc., PayPal, Inc. d/b/a paypal.com, Walmart Pay operated by Wal-Mart.com USA, LLC, and Context Logic, Inc. d/b/a wish.com, or marketplace platforms, including but not limited to,

² WorldPay US, Inc. ("WorldPay") processes transactions on behalf of Alibaba and Alipay, which may appear as "Aliexpress" on a cardholder's credit card statement.

Amazon.com, ebay.com, aliexpress.com, Walmart.com, and Context Logic, Inc d/b/a wish.com, and their related companies and affiliates, identify and restrain all funds, up to and including the total amount of judgment, in all financial accounts and/or sub-accounts used in connection with the Seller IDs or other domain names, alias seller identification names, or e-commerce store names or store URLs used by Defendants presently or in the future, as well as any other related accounts of the same customer(s) and any other accounts which transfer funds into the same financial institution account(s), to be surrendered to Plaintiff in partial satisfaction of the monetary judgment entered herein.

- i. Entry of an award of pre- and post-judgment interest on the judgment amount.
- j. Entry of an order for any further relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL

Plaintiff respectfully demand a trial by jury on all claims.

Respectfully submitted,

Dated: November 15, 2022

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Pittsburgh, Pennsylvania 15143

(412) 741-8400 - Telephone

(412) 741-9292 - Facsimile

Attorneys for Plaintiff

Schedule “A”
Defendants With Store Name and Seller ID

Defendant No.	Defendant/Store Name	Seller ID
1	JOYI YAN	A1E0TK70FFQDXI
2	anyangshilaichuangshangmaoyouxiangshi	A26352OHTSIYIQ
3	Aren's comprehensive center	A342JEAB1QWFS5
4	Authentidy	A1M3H4LQKDHLGG
5	boqin2022	A29Z6JBU932MGS
6	C-Zhan shop	AP7P7Z1W0NXWB
7	Daqian Shijie	A3J7F2PORKWO7V
8	Duo-YX	ABH5D9FKBMXG
9	dysmzsk	A8QD2MEVFHUNA
10	ERA store	A1BSUQT5V1NQ8K
11	Gazechimp	A1KN7E2QTA18DX
12	HYMS	A1XBTUJPD2DY5P
13	K_IMPORTS	A2F1UT4DM9UHF5
14	kuikui trading	A2LII6AI0FYBFI
15	LaoBaMiZhiXiaoHanBao	A1T1SSJF72TE8T
16	lbyzszl	A1O37O1YH2UJSQ
17	loiqkqkq	A2HX9WJAC9P4UG
18	Meejie Cleaning	A2QHMAP40LDUYP
19	Meric Pet Accessories	ABMR3Q27TUP9L
20	mingbaogou	AWML5AK8LYCET
21	MiNove	A3KDPILA7905KC
22	Misoongo	A37GGUAUJ5SQSA
23	MXM Store	AHTOY1PKLNPWV
24	PEVHSVZ US	ALOF4AGZYZCYI
25	RVOKOMS Direct	A16KJJAGPD9RRO
26	Shengxin trade - USA	AHU89RSLR2F2P
27	SUNNIMIX	A2JCX8Z5PAIFQ3
28	tbsm	A3ULZMACABZBYW
29	Tianliangpiju	A1T86E3FPW5UWS

30	ukoous	A39XN9SOX7GOUQ
31	wanbinshangmao	A203J1HIN4BD16
32	WEBEEDY US	A3AZEJAHREMDI
33	WEI HAO	A2DHD1C965E9WE
34	XINGYI-US	A1CFOYXGXAP8J4
35	Yangqingyu	A31X4B8HKDV3J7
36	YestonDirect-US	ABMEN088QH66V
37	yiwushiduijiaoxiandianzishangwuyouxiangongsi	A3IF68CGUISY5V
38	YMYMEIZ	A345P37YDYOAVV
39	your DQ	A3I63PSOWPKDUQ
40	Your First Market	A1LUGZD3B59DHA
41	YUHOO-US	A1VRZG3BIJJO9T
42	Zhixue Liu	A171JLJCITIG7P
43	A Wonderfully Store	1101867222
44	ATUBAN Pets Store	1101936657
45	BeautHome Store	1101222675
46	Chandler-ful Store	1101359379
47	Createyourlife Store	1101402982
48	DOGCAT PETS Store	1100656652
49	ELife Lovepet Store	1101400412
50	Fever 2 Store	1101564616
51	Future House Store	1101414489
52	General Utility Tool Store	1101669721
53	Hompy Poppy Store	1101953224
54	Houzime Store	1101940488
55	HYSAIXIA PETLAND Store	1101445612
56	Interesting lifestyle Store	1101931707
57	Lucky Pets Store	1102035418
58	maidehao Store	1101806239
59	Meowu Store	1101599500
60	MINGO life Store	1101845811
61	Moonbiffy High quality Pet Store	1102110805
62	Nature Home Store	1101935198
63	NICREW Cats & Dogs Store	1101369679
64	Ouyes Pet Life Store	1102021126
65	PET LOVE Store	1101955103
66	Pets Home Store	1101989276
67	Pinze EC Co., Ltd. Store	1101233348
68	PPIT Store	1101424651

69	Puppystar Pets Warm Life Store	1101411714
70	Seeyea Store	1101775444
71	Shop1102094194 Store	1102085250
72	SHUJIE Official Store	1101580774
73	Sofia lifestyle Store	1101630551
74	Triple-Nice Store	1101396069
75	WSEYU Store	1101858150
76	xiao9A Store	1101922601
77	xiao9B Store	1101767445
78	Youjia Kitchen Supplies Store	1102107890
79	Youool Hometown Drop shopping Store	1101311192
80	YY-pet Store	1101846089
81	Zezzo Gadgets Store	1101909467
82	ZJMZYM Daily-Use Sundry Goods Store	1101337191
83	5jayde	233899604238
84	904will29	154607275650
85	achmadhu 99	234027126654
86	adip45	283510736311
87	amananay4	195216898989
88	an-844627	384964255309
89	atlanta1	193871796742
90	autismmom1440	284651016474
91	bermudatreasures	274611019651
92	best4purchase	314081862900
93	bluevalleyassets	393598674518
94	boasseenontv	392752328778
95	bubbagrgrv	284814830874
96	butle-mary	224441241041
97	buy-from-me.deal	265568313557
98	chanukamalindajayasinghe	125391177469
99	charlierock79	284375412609
100	chenm 2270	393372617398
101	cherryone13	275402763716
102	cluxton40	393106596375
103	comfo26	234135776269
104	coshe-7870	403445879662
105	deencollections	325291647951
106	ezcartllc1	294303336258

107	fehat-53	384871490949, 384866556811
108	gajindkulasingh 0	402874330121
109	galorenmore	353856383597
110	gencoorganics 1	314044865944
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112	gocartgo	363927951668
113	goingoutofbusiness100	185284548161
114	hbj-enterprises	403856690391, 403823187157
115	hobojoe420	275391275479
116	imonkeysllc	284328117858
117	indjayat-87	363479974812
118	inneretherealbox	403804413886
119	j_murrel-6	185266564780
120	jacksbargainbin	134191554358
121	jagathexport 77	124826163119
122	janakaraj5	255680372517
123	jasbar 8039	363754349926
124	jdresales	224340768219
125	jivan-impex	295189018589
126	jts nifty thrifties	175364558022
127	jujue bean	152884931504
128	kabi mart	265229359154
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130	kavlak-40	203582208214
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141	pramono2015	393439761577
142	premium product uk	304578475665

143	redberry-0515	384996910520, 385083183690, 385087486969
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145	rizmanery	294985863035
146	sarathom-46	314094237981
147	sezme-y-0	175393007414
148	shoplc-us	124487132594
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150	superornot	165593348188
151	techmar64	374062287024
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153	trandetree007us	165604533329
154	treasure hunter 68	265711434575
155	twigistore_09	295158966054
156	yalgopala 0	385069788163
157	yoyo19752009	144225335818
158	BIOOK Direct	101187560
159	Everest Ventures	6111
160	Intego Nutrition	101118721
161	Menolana	101125294
162	shanghaiantuowangluokejiyouxianzerengongsi	101191914
163	shenzhenshijiuchenmaoyiyouxiangongsi	101091370
164	Shine Asloa Investment Trade Inc	101079497
165	Shop LC	10735
166	SiPingShi ZhongLian KeJi YouXianGongSi	101128930
167	VANJUNN	101098281
168	Wevove	101130357
169	XunMall Co., Ltd	101078361
170	adytutip	607a62c3e5561b4620629163
171	AINOLWAY	5818124c4199ad48d61404f4
172	anshibo	5a9e902047a0e71cf7797923
173	CCL1	5e78c23072b03257001366c6
174	ettiyot	607d1d34c5c974004b9406bb
175	fangbiao1994	57dff51cddd0f0105938ffe1
176	Feiyu Textile	545b102d3dabbe5d2e715a8a
177	Firstglass	5d5bb54b283abc54d04a5303
178	Flygear	5d47f0244f7ba767aad67e99
179	growuplyz	5a6854e8ddd8c53f562c28c

180	huasong	585ba527728de61793ea08c4
181	LanXiuLong's Store	5b5a189ef114fc2ac6e4740d
182	lovess	5a53439d149ff83526a4330f
183	mengmeng2457	5f87a4308ce488369fd4b1f8
184	My Smile Power	591a67524b5a470cff52054a
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191	Tung1964	5f853cc6e91ca716551becba
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193	xionglimei	5a0ff94368788b6e7c046192
194	yetoooo	5adae83954bd094de7d55945
195	yqbuiizaipa	5af258ce4972794e2526d5b6

LISTING OF EXHIBITS

- Exhibit 1.....Screenshots from Plaintiff’s Website and Amazon Store
- Exhibit 2.....U.S. Patent No. 10,531,728
- Exhibit 3.....Comparison of Type 1 Infringing Product to claim 1 of U.S. Patent No. 10,531,728
- Exhibit 4.....Comparison of Type 2 Infringing Product to claim 1 of U.S. Patent No. 10,531,728

Exhibit 1

<https://www.aquapaw.com/products/aquapaw-bathing-tool>

(Excerpts)

FREE 2-3 Day Shipping on Orders over \$30 - As Seen On SHARK TANK

aquapaw Shop Now About Us Contact Store Locator How-To Install Blog

Aquapaw® Pet Bathing Tool

\$24.95

[Buy on Amazon](#)

The Aquapaw Bathing Tool is the world's first wearable combination sprayer-scourer that can be turned on and off by simply making a fist. Stay in total control over your pet and the flow of water during the entire bathing process.

- Simply "Click" ON and "Click" OFF one-handed by making a fist and pressing button in center of the palm, allowing you to always keep one hand on your pet.
- One size fits all design straps quickly and easily to either left or right hands.
- Includes adapters to connect to either your shower or garden hose.
- Comes with 8 1/2 feet hose.

REVIEWS

LIFETIME WARRANTY

ASK A QUESTION

Share Tweet Pin it

uncommon goods petco chewy.com amazon.com

Turn ON and OFF with a CLICK

Simple, one-handed operation

Adapters Included


Quiet



Amazon Store and Example Photos

amazon pharmacy Prime members, get select items starting at \$1/month. Learn more >

Pet Supplies > Dogs > Grooming > Showers & Bath Accessories



Bathe your pet like you're petting them

Roll over image to zoom in

Aquapaw Pet Bathing Tool – Sprayer and Scrubber in One – Compatible with Indoor Shower or Outdoor Garden Hose – for Dog and Cat Grooming – Garden Hose and Shower Adapters Included

Visit the Aquapaw Store

★★★★★ - 4,096 ratings

Price: **\$24.95** +prime & FREE Returns

Thank you for being a Prime Member. Get \$125 off: Pay \$0.00 \$24.95 upon approval for the Amazon Business Prime Card. Terms apply.

Size: **1 Count (Pack of 1)**

Pro \$44.95 +prime	1 Count (Pack of 1) \$24.95 +prime
--------------------------	---

- Pet bathing made easy: Save time, money and water when you wash your furry friends at home with this innovative pet shower attachment. The original Aquapaw is easy to install and operate.
- Eliminates mess and stress: This all-in-one tool lets you brush and rinse your pet simultaneously, for faster bathing with no need for bucket rinsing. The button mechanism lets you click easily from ON to OFF with one hand, leaving your other hand free to soothe your pet.
- Indoor/outdoor use: Comes with adapters to fit shower spigot or garden hose, so you can easily create a small animal grooming station indoors in your tub or a large animal shower outside. Includes 8-foot hose.
- Ergonomic design: With its one-size-fits-all design, Aquapaw straps securely to either hand. The ON/OFF button rests in your palm, for ease of operation. The strap adjusts easily to fit all hand sizes.
- Quality materials: The scrubber tool is 100% FDA-grade silicone – strong enough for scrubbing thick fur, yet soft enough to be gentle on your pet's sensitive areas.

\$24.95
+prime & FREE Returns

FREE delivery: **Wednesday, July 14**
Order within 11 hrs and 57 mins
Details

Deliver to Christina - Pittsburgh 15237

In Stock.

Qty: 1

Add to Cart

Buy Now

Secure transaction

Ships from Amazon
Sold by Aquapaw

Return policy: This item is returnable.

Add a gift receipt for easy returns

Add to List

Share





aquapaw[®]
Pet Bathing Tool

Make Bath Time Happier
 Our innovative sprayer and scrubber in one can help you reduce the stress of bath time for both you and your pup.

Simple, One-Handed Operation



The innovative click on/click off design makes it easy to bathe your pet in the same way you would pet them with one hand, and always have the other hand to keep them under control.

Adapters Included for Indoor and Outdoor Use



In the shower or outside with the garden hose, we have you covered too! Adapters are included in each and every Aquapaw along with simple instructions to make setup as easy and fast as possible.

Make Bathtime Easier For You AND Your Pet



Sprayer AND Scrubber in Your Palm
 Water sprays from rubber scrubbers in your palm, allowing you to soak, scrub, and rinse your pet by injecting water deep into their fur.



Less Spraying Water for Less Mess
 The Aquapaw bathing tool can be operated entirely with one hand. Use both hands to comfort your pet while bathe them like you're petting them.



One Size Fits All
 The Aquapaw is slim, flexible, and doesn't impede your dexterity. Use the adjustable strap on the back to fit hands of all shapes and sizes.

Exhibit 2



US010531728B2

(12) **United States Patent**
Lentz

(10) **Patent No.:** **US 10,531,728 B2**

(45) **Date of Patent:** **Jan. 14, 2020**

(54) **HAND ATTACHABLE ANIMAL WASHING APPARATUS**

A46B 1/00; A46B 5/029; A46B 5/04; A46B 9/005; A46B 11/0072; A46B 2200/1093; A46B 5/0025; A46B 5/002; A46B 5/0033; A46B 2200/10; A46B 2200/20; A01K 13/001

(71) Applicant: **Daniel Jacob Lentz**, Campbell, CA (US)

See application file for complete search history.

(72) Inventor: **Daniel Jacob Lentz**, Campbell, CA (US)

(56) **References Cited**

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 305 days.

U.S. PATENT DOCUMENTS

(21) Appl. No.: **15/641,018**

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(22) Filed: **Jul. 3, 2017**

(65) **Prior Publication Data**

US 2018/0078028 A1 Mar. 22, 2018

(Continued)

Related U.S. Application Data

Primary Examiner — David J Walczak

(60) Provisional application No. 62/396,123, filed on Sep. 17, 2016.

(74) *Attorney, Agent, or Firm* — Williams Intellectual Property; Benjamin F. Williams

(51) **Int. Cl.**

<i>A46B 11/06</i>	(2006.01)
<i>A46B 1/00</i>	(2006.01)
<i>A46B 5/04</i>	(2006.01)
<i>A46B 9/00</i>	(2006.01)
<i>A46B 11/00</i>	(2006.01)
<i>A01K 13/00</i>	(2006.01)
<i>A46B 5/00</i>	(2006.01)

(57) **ABSTRACT**

A hand attachable animal washing apparatus, attachable upon the hand of a user, enables singlehanded control of water flow and application of water into the coat of an animal. Control of water flow through a molded body portion is effective by singlehanded operation of a valve assembly disposed interiorly within the molded body portion. A user is enabled to open and close the valve assembly by compressing a compressible portion disposed proximally overlying the user's palm when wearing the apparatus upon one hand. A user may thereby control and apply water applied to an animal with one hand while securing and comforting the animal with the other hand.

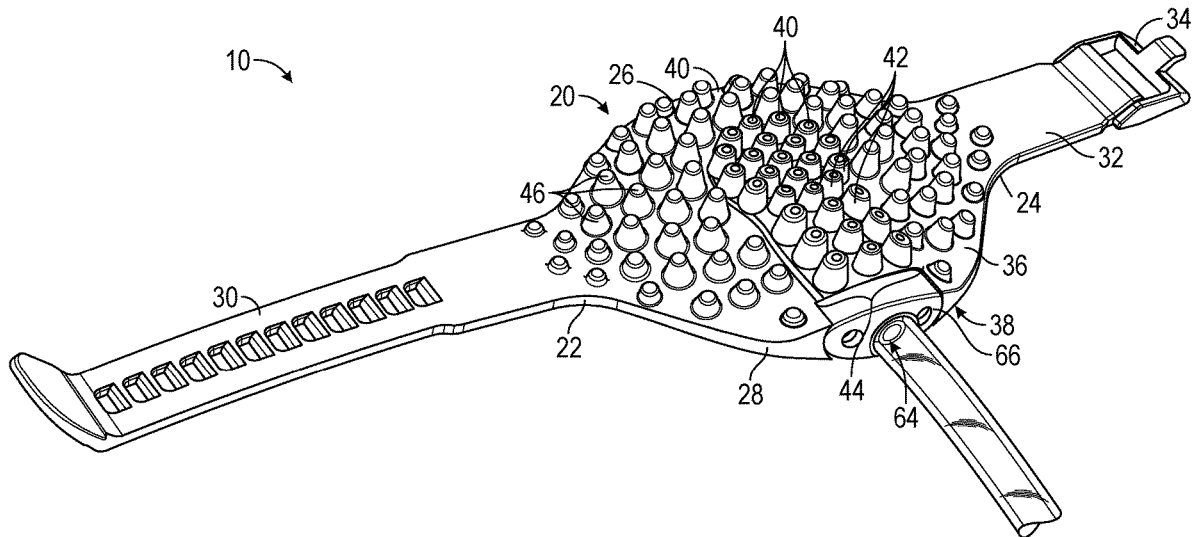
(52) **U.S. Cl.**

CPC *A46B 11/063* (2013.01); *A01K 13/001* (2013.01); *A46B 1/00* (2013.01); *A46B 5/0029* (2013.01); *A46B 5/04* (2013.01); *A46B 9/005* (2013.01); *A46B 11/0006* (2013.01); *A46B 11/0072* (2013.01); *A46B 2200/1093* (2013.01)

(58) **Field of Classification Search**

CPC ... A46B 11/063; A46B 11/06; A46B 11/0006;

11 Claims, 5 Drawing Sheets



(56)

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* cited by examiner

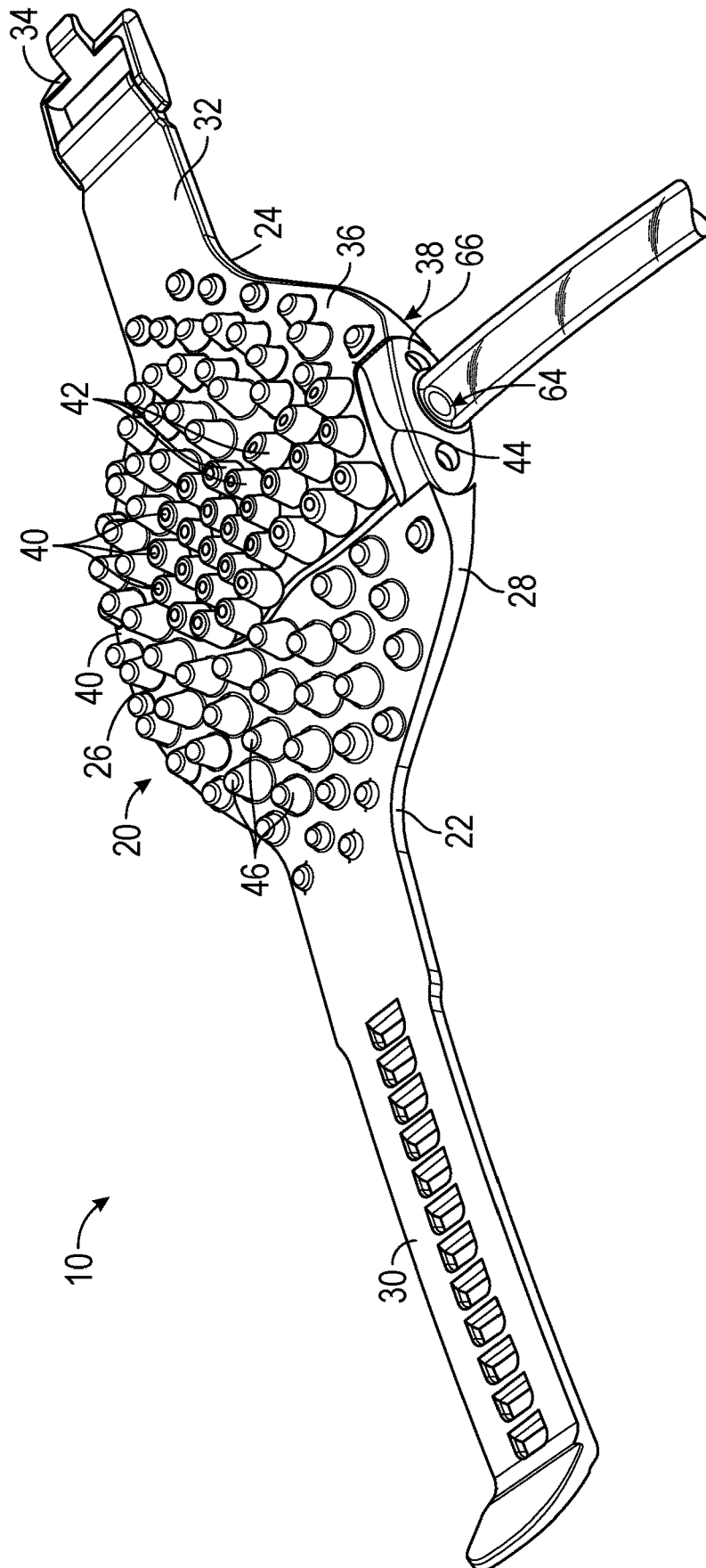


FIG. 1

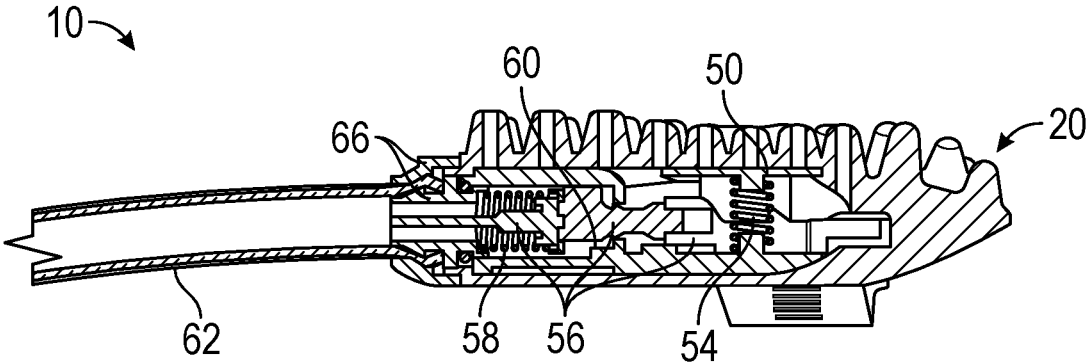


FIG. 2

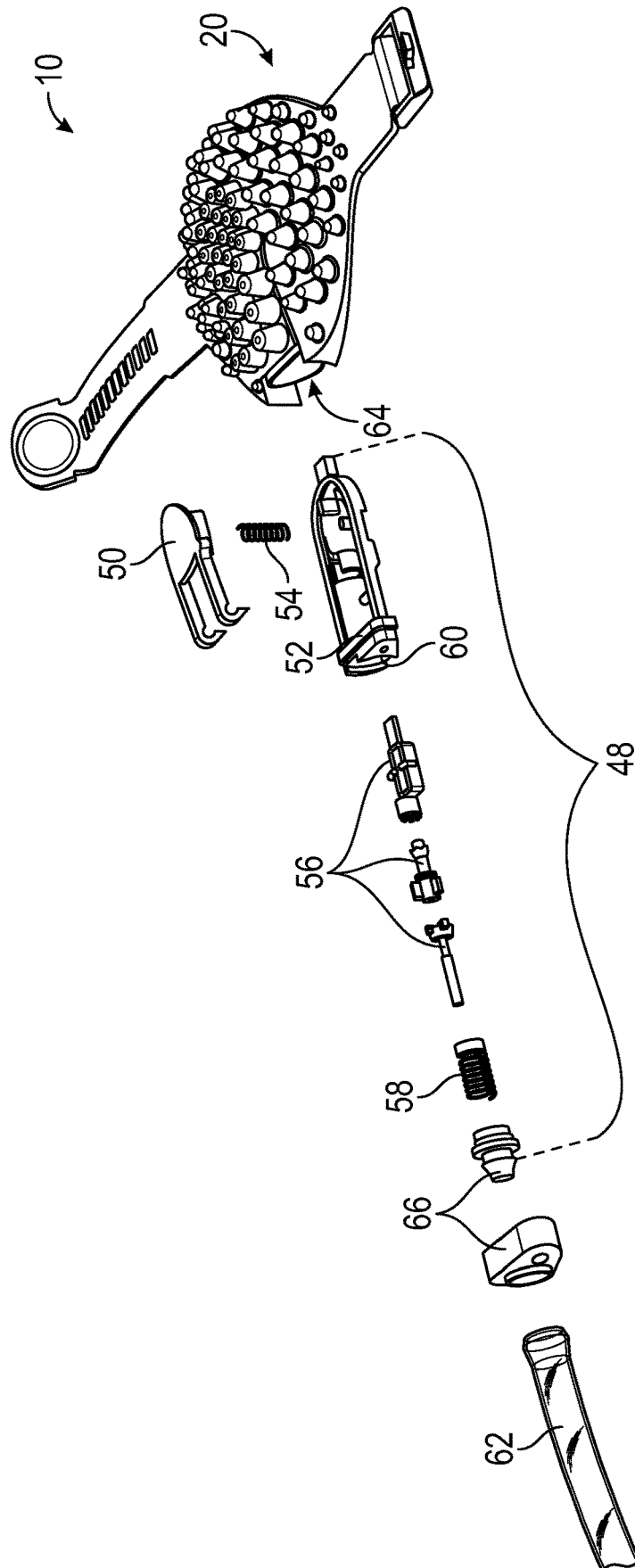


FIG. 3

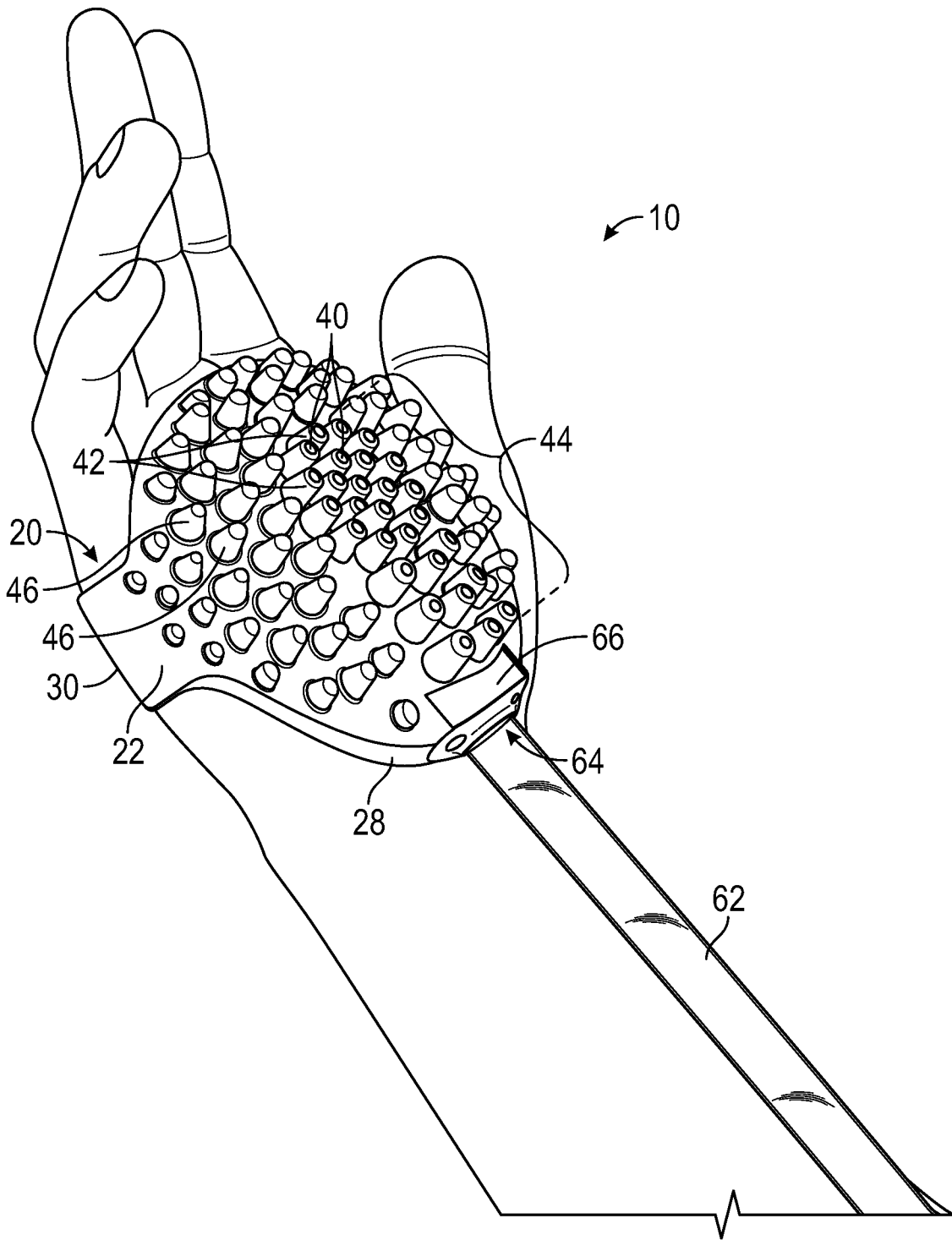
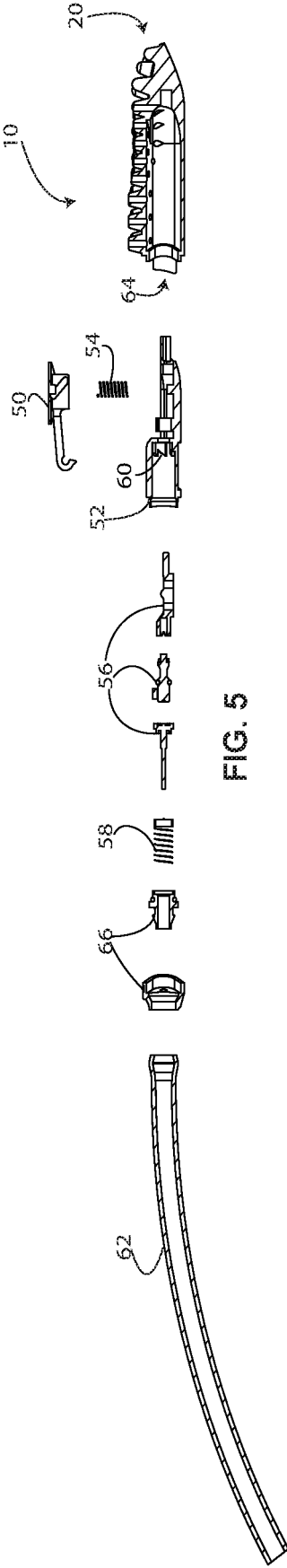


FIG. 4



1

**HAND ATTACHABLE ANIMAL WASHING
APPARATUS****CROSS-REFERENCE TO RELATED
APPLICATIONS**

This nonprovisional application claims the benefit of provisional application No. 62/396,123 filed on Sep. 13, 2016

**FEDERALLY SPONSORED RESEARCH OR
DEVELOPMENT**

Not Applicable

**INCORPORATION BY REFERENCE OF
MATERIAL SUBMITTED ON A COMPACT
DISK**

Not Applicable

BACKGROUND OF THE INVENTION

Washing animals can be troublesome and time consuming. Animals often shy away from water ejected from a hose pipe, which is sometimes noisy. Moreover, use of a hose to wash an animal, which is typical in the art, frequently applies more water than is necessary, ejects water somewhat uncontrollably, and often results in the user getting wet as well. This renders washing an animal an unpleasant experience for all involved.

What is needed is a hand attachable animal washing apparatus that enables singlehanded control of water flow through a plurality of openings to direct application of controlled water flow to an animal while maintaining the user's other hand unencumbered to comfort the animal in question, or secure said animal in place, or otherwise administer additional accouterments desirably wielded during washing. The present hand attachable animal washing apparatus therefore prevents the user from getting wet, enables more controlled application of water to the animal, and lessens discontent of the animal by operating less visibly and quieter than a hose, while enabling the user to coax and comfort the animal with said user's free hand.

FIELD OF THE INVENTION

The present invention relates to a hand attachable animal washing apparatus devised to secure to the hand of a user and enable singlehanded control of water flow therethrough. The present hand attachable animal washing apparatus further enables direct application of water into the fur of an animal without effecting an uncontrolled spray of water. The present hand attachable animal washing apparatus, therefore, enables controlled release of water for direct application to an animal for washing, while allowing a user to maintain one hand free for interaction with the animal or for use wielding additional accouterments desirable during washing.

The present hand attachable animal washing apparatus, therefore, includes a molded body member, formed of polymer which is pliable and yielding to the touch. The molded body member includes an obverse surface having a plurality of outlets and a plurality of protuberances projected perpendicularly therefrom. Each of the plurality of outlets has each of a plurality of openings disposed apically thereatop. Water is enabled passage through the molded body

2

member for controlled emission through each of the plurality of openings by manual action controlling a valve assembly disposed interior to the molded body member. The valve assembly is controllable by manual depression of a compressible portion, disposed interior to the molded body member at a position appropriate to proximally overlie the center of a user's palm to which the present device is attached. A user may, therefore, actuate the device and alternately enable and disable controlled emission of water by action of clenching one hand, wherein said user's fingers depress the compressible portion. Thus a user is enabled singlehanded control of water for direct and controlled application directly into the animal's coat. Moreover, the plurality of protuberances and plurality of outlets are devised to penetrate into the animal's fur and contact the animal's epidermis, whereby the animal is brushed and stroked during the act of washing, which may comfort the animal even while water and soap is being applied into the animal's coat.

SUMMARY OF THE INVENTION

The present hand attachable animal washing apparatus, described subsequently in greater detail, has been devised to enable control of outflow of water singlehandedly while washing an animal, such as a dog or horse, for example. The present hand attachable animal washing apparatus enables use of one hand when applying water whereby the other hand may be used to secure or comfort that animal being washed. The animal is therefore more receptive to washing than is typically the case when a hose, sponge, and soap are more haphazardly applied absent the present invention.

The present hand attachable animal washing apparatus includes a molded body member attachable overtop the palm of a hand of a user. In the example embodiment set forth herein, the molded body member is generally ovoid and formed, or otherwise molded, of an impermeable polymer, such as, for example, silicone. The molded body member is therefore pliable and flexible. The molded body member includes an obverse surface and a reverse surface. The reverse surface is generally smooth and devised for comfortable fit overtop a user's palm, as will be described subsequently. The obverse surface includes a plurality of openings disposed to emit water when the molded body member is connected to a water outlet and a valve assembly, disposed interior to the molded body member, is toggled between a closed situation and an open situation, as will be described subsequently.

In the example embodiment herein described, each of the plurality of openings is disposed apically atop each of a plurality of outlets. Each of the plurality of outlets is elongate, conical, and perpendicularly disposed atop the obverse surface. The plurality of outlets is disposed in a central cluster, essentially overtop the valve assembly interior to the molded body member, and in open communication therewith, whereby flow of water through the molded body member is effective through the central cluster. Surrounding the central cluster is a plurality of protuberances, each of which plurality of protuberances is perpendicularly disposed atop the obverse surface, there devised to penetrate into the fur of an animal, stimulate the epidermis, and brush the animal's coat during washing.

The molded body member is delimited by a distal arced edge, a proximal arced edge, a first side apex, and a second side apex. The molded body member may taper in thickness towards each of the first side apex and the second side apex. A strap member is disposed upon the first side apex and

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devised to releasably secure to a connection portion disposed upon the second side apex. The strap member and connection portion may resemble a watch strap, for example, and releasable securement may be effective by action of a buckle member disposed to interconnect said strap member with the connection portion.

The molded body member is therefore positionable upon the palm of a user's hand and then securable by engagement of each of the strap member and connection portion connectable around the dorsal of said user's hand. A connecting line is disposed at the proximal arced edge, said connecting line devised for distal attachment to a water outlet, such as a tap, wherein water is introducible into the molded body member and therein controllable by action of the valve assembly.

The valve assembly includes a compressible portion disposed against the action of a first spring member. The compressible portion is disposed interior to the molded body portion proximally located in a position appropriate to overlie the center of a user's palm when said user is wearing the device. The compressible portion is depressible when a user effects a first with the hand wearing the device, and inwardly clenches said user's fingers to engage the compressible portion against the action of the first spring member. The compressible portion toggles outflow of water from the plurality of openings by moving a switch member alternately between each of a first position and a second position whereby throughflow of water is enabled and alternately disabled.

In the example embodiment depicted herein, and described subsequently in more detail below, the switch member is disposed against the action of a second spring member. When moved to the first position, the switch member is first forced in a first direction and compresses the second spring member. The second spring member is thus tensioned against the switch member, but is prevented from rebounding due to the switch member being oriented against a stop member. Throughflow of water through a valve outlet disposed in the valve assembly is now enabled, and water is thus emitted from the plurality of openings for controlled application to an animal. Subsequent depression of the compressible portion thence disengages the switch member from the stop member, whereby the second spring member rebounds and forces the switch member to the second position whereby the valve outlet is closed and the valve assembly subsequently rendered in the closed situation. Throughflow of water is thus disabled.

A user is thus enabled expedient control of throughflow of water when washing an animal, and may expediently toggle the present device to wet the animal and then rinse subsequent application of soap, for example. The polymeric molded body member is pliable and yielding, and therefore enables direct application of water into the animal's coat, and further acts as an applicator brushing the water and any applied soap into the animal's coat. The user may also use said user's other hand for holding the animal, comforting the animal, or for other actions useful in expediting washing an animal due to singlehanded operation of the present device controlling application of water for washing and rinsing said animal, as desired.

Thus has been broadly outlined the more important features of the present hand attachable animal washing apparatus so that the detailed description thereof that follows may be better understood and in order that the present contribution to the art may be better appreciated.

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For better understanding of the hand attachable animal washing apparatus, its operating advantages and specific objects attained by its uses, refer to the accompanying drawings and description.

BRIEF DESCRIPTION OF THE DRAWINGS

Figures

FIG. 1 is a plan elevation view of an example embodiment.

FIG. 2 is a longitudinal cross-section view of an example embodiment.

FIG. 3 is an exploded view of an example embodiment.

FIG. 4 is an in-use view of an example embodiment attached to a user's hand.

FIG. 5 is a side elevation exploded view of an example embodiment.

DETAILED DESCRIPTION OF THE DRAWINGS

With reference now to the drawings, and in particular FIGS. 1 through 5 thereof, example of the instant hand attachable animal washing apparatus employing the principles and concepts of the present hand attachable animal washing apparatus and generally designated by the reference number 10 will be described.

Referring to FIGS. 1 through 5 a preferred embodiment of the hand attachable animal washing apparatus 10 is illustrated.

The present hand attachable animal washing apparatus 10 has been devised to enable controlled emission of water through a plurality of openings 40 disposed in an obverse surface 36 of a molded body member 20 effected by singlehanded operation of a user wearing the device. The hand attachable animal washing apparatus 10 is attachable overlying the palm of a user whereby the molded body member 20 is disposed against the palm of the user. The plurality of openings 40 disposed in the obverse surface 36 of the molded body member 20 enables controlled outflow of water when an interior valve assembly 48 is activated between a closed situation and an open situation, whereby throughflow of water from a connecting line 62 is directable out each of the plurality of openings 40 for controlled application directly to an animal contacted with the obverse surface 36. Singlehanded operation of the valve assembly 48 enables a user to secure the animal in appropriate position with their other hand during the act of washing.

Discussing now the drawings of an example embodiment of the present device depicted herein, the present hand attachable animal washing apparatus 10, therefore, includes a generally ovoid molded body member 20 attachable overlying the palm of a user's hand. The molded body member 20 is contemplated to be polymeric and flexible, and includes a first side apex 22, a second side apex 24, a distal arced edge 26, and a proximal arced edge 28. A strap member 30 is disposed extended from the first side apex 22, said strap member 30 attachable to a connection portion 32 disposed at the second side apex 24. The strap member 30 and connection portion 32 may resemble a wrist watch strap, for example, and include a buckle member 34 disposed to releasably secure the strap member 30 and connection portion 32 together. Additional means of releasable securement of said strap member 30 and connection portion 32 are contemplated as part of this disclosure.

The molded body member 20 includes an obverse surface 36 and a reverse surface 38. The reverse surface 38 is disposed to overlie the palm of a user's hand to which the

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device is attached by action of the strap member **30** securing to the connection portion **32** around the dorsal side of the user's hand.

The plurality of openings **40** is disposed endwise upon each of a plurality of outlets **42**. Each of the plurality of outlets **42** may be elongate, conical, and disposed in a central cluster **44**, as depicted herein, or otherwise disposed upon the obverse surface **36**. In the example embodiment shown, a plurality of protuberances **46** is disposed surrounding the central cluster **44**, each of said plurality of protuberances **46** disposed to contact through the fur of the animal to which the device is applied when washing. The plurality of protuberances **46**, and each of the plurality of outlets **42**, act to effect brushing of the animal's coat as well as to apply water into the fur and against the epidermis.

A valve assembly **48** is disposed interiorly within the molded body member **20** in open communication with each of the plurality of openings **40**. The valve assembly **48** includes a compressible portion **50** devised to alternately open and close a valve outlet **52** when depressed. The compressible portion **50** is situated in a position interior to the molded body member **20** proximally overlying the center of the user's palm when wearing the device on a hand, whereby said user may effect depression of the compressible portion **50** with said user's fingers by making a fist, and pressing centrally toward said user's palm. The compressible portion **50** is disposed against the action of a first spring member **54**, said first spring member **54** disposed to return the compressible portion **50** to an uncompressed position once released. When compressed, the compressible portion **50** enables reorientation of a switch member **56** between a first position and a second position. In the preferred embodiment herein disclosed, movement of the switch member **56** between the first position and the second position includes rotational movement of the switch member **56**.

When moved to the first position, the switch member **56** is forced in a first direction against the action of a second spring member **58**, whereby the switch member **56** tensions said second spring member **58**. The second spring member **58** is prevented from rebounding, however, by action of a stop member **60** against which the switch member **56** is rotatably oriented, whereby the valve outlet **52** is maintained open and the valve assembly **48** is rendered in the open situation. Subsequent depression of the compressible portion **50** reorients the switch member **56** by effecting rotational movement in a second direction, whereby the switch member **56** is disengaged with the stop member **60**, and the second spring member **58** is enabled rebound to return the switch member **56** to the second position wherein the valve outlet **52** is closed and the valve assembly **48** is rendered in the closed situation. Alternate depressions of the compressible portion **50** therefore toggle the valve assembly **48** between the open situation and closed situation.

The connecting line **62** is disposed attached at a proximal inlet **64** medially disposed in the proximal arced edge **28** of the molded body member **20** and may be secured thereat by means of a connect housing **66**. The connecting line **62** may be detachable from the connect housing **66**. The connecting line **62** is distally attachable to a water outlet, such as an existing hose pipe or tap, for example. Opening said tap, or hose pipe, enables flow of water into the connecting line **62** and into the molded body member **20**. Water is prevented from exiting through the plurality of openings **40** disposed upon the obverse surface **36** until the valve assembly **48** is disposed in the open situation.

Compression of the compressible portion **50** therefore enables selective opening and closing of the valve assembly

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48 between the open and closed situations whereby outflow of water is controllable singlehandedly while washing an animal. A user may, therefore, use their free hand for holding the animal in position, for coaxing or comforting the animal, or otherwise to participate in the act of washing, as desired.

What is claimed is:

1. A hand attachable animal washing apparatus attachable to a hand of a user for singlehanded control of water emitted therefrom, said hand attachable animal washing apparatus comprising:

- a molded body member;
- a reverse surface disposed upon the molded body member and configured to overlie a palm of a hand of a user when the body member is attached to the hand of the user;
- an obverse surface;
- a plurality of outlets projected up from the obverse surface, each of the plurality of outlets having an opening thereatop;
- a proximal inlet in open communication with each of the plurality of openings, said proximal inlet connectable to a connecting line for conveyance of water there-through; and

2. a valve assembly disposed interiorly within the body member in a position enabling singlehanded operation thereof by manual action of the same hand of the user to which the body member is fitted, said valve assembly thereby operational between an open configuration and a closed configuration to control water flow there-through;

wherein action of the valve assembly is controllable by the same hand of the user upon which the molded body is worn whereby singlehanded application of water when washing an animal is controllable at one hand.

3. The hand attachable animal washing apparatus of claim 1 wherein the valve assembly comprises:

- a compressible portion disposed against the action of a first spring member, said compressible portion compressible between a compressed position and an uncompressed position;
- a switch member in operational communication with the compressible portion, said switch member alternately positionable between a first position and a second position when the compressible portion is compressed;
- a second spring member tensioned against the switch member when the switch member is moved from the first position to the second position; and

a stop member disposed to prevent rebound of the second spring member returning the switch member to the first position until the compressible portion is again compressed and the switch member is disengaged from the stop member;

wherein sequential compression of the compressible portion alternately renders the valve assembly in an open configuration and a closed configuration whereby control of water flow through the valve assembly is effective by singlehanded use of a user.

4. The hand attachable animal washing apparatus of claim 2 wherein a plurality of protuberances is disposed perpendicularly projected from the obverse surface proximal the plurality of outlets.

5. The hand attachable animal washing apparatus of claim 3 wherein the molded body member is polymeric and flexible, said molded body member further comprising:

- a first side apex;
- a second side apex;

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a strap member endwise disposed at the first side apex; and
 a connecting portion endwise disposed at the second side apex, said connecting portion configured for securable connection with the strap member;
 wherein the strap member and connecting portion enable securement of the molded body member to the hand of the user.

5. The hand attachable animal washing apparatus of claim 4 wherein the molded body member further comprises a connect housing disposed at the proximal inlet whereby the connecting line is securable into the connect housing.

6. A hand attachable animal washing apparatus comprising:
 a molded body member attachable overtop the palm of a user, said molded body member having:
 an obverse surface, a reverse surface, a first side apex, a second side apex, a distal arced edge, and a proximal arced edge;
 a strap member endwise disposed at the first side apex;
 a connection portion endwise disposed at the second side apex, said connection portion securable to the strap member;
 a plurality of outlets disposed upon the obverse surface; each of a plurality of openings disposed endwise upon each of the plurality of outlets;
 a proximal inlet disposed in the proximal arced edge, said proximal inlet disposed in open communication with each of the plurality of openings;
 a connecting line disposed attachable at the proximal inlet, said connecting line distally attachable to an existing water outlet; and
 a valve assembly disposed interiorly within the molded body member between the proximal inlet and each of the plurality of openings, said valve assembly operable between a first position and a second position to selectively control water flow to each of the plurality of openings;
 wherein action of the valve assembly is controllable by one hand of a user upon which the molded body is worn, whereby singlehanded application of water when washing an animal is controllable at one hand.

7. The hand attachable animal washing apparatus of claim 6 wherein the valve assembly comprises:
 a compressible portion disposed against the action of a first spring member, said compressible portion compressible between a compressed position and an uncompressed position;
 a switch member in operational communication with the compressible portion, said switch member rotatably alternately positionable between a first position and a second position when the compressible portion is compressed;
 a second spring member tensioned against the switch member when the switch member is moved from the first position to the second position; and
 a stop member disposed to prevent rebound of the second spring member returning the switch member to the first position until the compressible portion is again compressed and the switch member is rotatably disengaged from the stop member;
 wherein sequential compression of the compressible portion alternately renders the valve assembly in an open configuration and a closed configuration whereby control of water flow through the valve assembly is effective by singlehanded use of a user.

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8. The hand attachable animal washing apparatus of claim 7 wherein the molded body member further comprises a connect housing disposed at the proximal inlet whereat the connecting line is attachable.

9. The hand attachable animal washing apparatus of claim 8 wherein the molded body member is polymeric and flexible.

10. The hand attachable animal washing apparatus of claim 9 wherein the plurality of outlets is disposed upon the obverse surface in a central cluster surrounded by a plurality of protuberances assistive in brushing an animal's coat.

11. A hand attachable animal washing apparatus comprising:
 a generally ovoid, polymeric and flexible molded body member attachable overtop the palm of a user, said molded body member having:
 an obverse surface, a reverse surface, a first side apex, a second side apex, a distal arced edge, and a proximal arced edge;
 a strap member endwise disposed at the first side apex;
 a connection portion endwise disposed at the second side apex, said connection portion securable to the strap member;
 a plurality of elongate, conical outlets disposed upon the obverse surface in a central cluster;
 a plurality of protuberances disposed upon the obverse surface approximal and surrounding the central cluster of the plurality of outlets;
 each of a plurality of openings disposed endwise upon each of the plurality of outlets;
 a proximal inlet medially disposed in the proximal arced edge, said proximal inlet disposed in open communication with each of the plurality of openings;
 a connect housing disposed at the proximal inlet;
 a connecting line disposed attachable at the connect housing, said connecting line distally attachable to an existing water outlet;
 a valve assembly disposed interiorly within the molded body member, said valve assembly disposed between the proximal inlet and each of the plurality of openings in a position to proximally overlie the palm of a user wearing the molded body portion, said valve assembly operable between a closed configuration and an open configuration to selectively control water flow through each of the plurality of openings, said valve assembly including:
 a compressible portion disposed against the action of a first spring member, said compressible portion compressible between a compressed position and an uncompressed position;
 a switch member in operational communication with the compressible portion, said switch member rotatably alternately positionable between a first position and a second position when the compressible portion is compressed;
 a second spring member tensioned against the switch member when the switch member is moved from the first position to the second position; and
 a stop member disposed to prevent rebound of the second spring member returning the switch member to the first position until the compressible portion is again compressed and the switch member is rotatably disengaged from the stop member;
 wherein action of the valve assembly is controllable by one hand of a user upon which the molded body is

worn, whereby singlehanded application of water when washing an animal is controllable at one hand.

* * * * *

Exhibit 3

Text of Claim 1

Type 1 Infringing Product

1. A hand attachable animal washing apparatus attachable to a hand of a user for singlehanded control of water emitted therefrom, said hand attachable animal washing apparatus comprising:

a molded body member;

a reverse surface disposed upon the molded body member and configured to overlie a palm of a hand of a user when the body member is attached to the hand of the user;

an obverse surface;

a plurality of outlets projected up from the obverse surface, each of the plurality of outlets having an opening thereatop;

a proximal inlet in open communication with each of the plurality of openings, said proximal inlet connectable to a connecting line for conveyance of water therethrough; and

a valve assembly disposed interiorly within the body member in a position enabling singlehanded operation thereof by manual action of the same hand of the user to which the body member is fitted, said valve assembly thereby operational between an open configuration and a closed configuration to control water flow therethrough;

wherein action of the valve assembly is controllable by the same hand of the user upon which the molded body is worn whereby singlehanded application of water when washing an animal is controllable at one hand.

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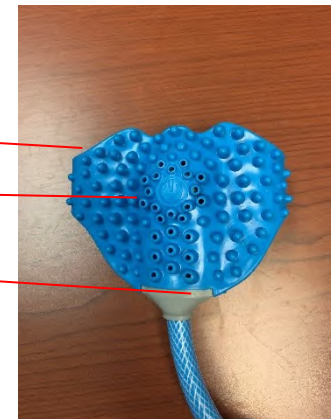
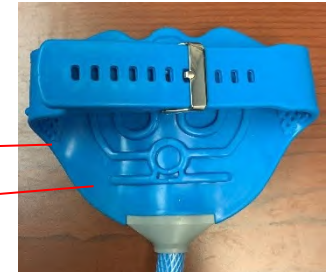


Exhibit 4

Text of Claim 1

Type 2 Infringing Product

1. A hand attachable animal washing apparatus attachable to a hand of a user for singlehanded control of water emitted therefrom, said hand attachable animal washing apparatus comprising:

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a molded body member;

a reverse surface disposed upon the molded body member and configured to overlie a palm of a hand of a user when the body member is attached to the hand of the user;

an obverse surface;

a plurality of outlets projected up from the obverse surface, each of the plurality of outlets having an opening thereatop;

a proximal inlet in open communication with each of the plurality of openings, said proximal inlet connectable to a connecting line for conveyance of water therethrough; and

a valve assembly disposed interiorly within the body member in a position enabling singlehanded operation thereof by manual action of the same hand of the user to which the body member is fitted, said valve assembly thereby operational between an open configuration and a closed configuration to control water flow therethrough;

wherein action of the valve assembly is controllable by the same hand of the user upon which the molded body is worn whereby singlehanded application of water when washing an animal is controllable at one hand.

