

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

AQUAPAW BRANDS LLC,
Plaintiff,

v.

JOYI YAN, *et al.*,

Defendants.

Civil Action No. 22-cv-1607

(Judge Wiegand)

[PROPOSED] AMENDED PRELIMINARY INJUNCTION ORDER

WHEREAS, Plaintiff filed an *Ex Parte* Application for the following: 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 the Defendants identified on **Schedule “A”** to the Complaint and attached hereto (collectively, the “Defendants”)¹. The Court has considered the Application, the evidence in the record, and the applicable law.

WHEREAS, Plaintiff 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 November 18, 2022, the Court entered the following Orders:

¹ As alleged in the Complaint, are knowingly and intentionally promoting, advertising, distributing, offering for sale, and selling patent infringing versions of Plaintiff’s AquaPaw® dog bathing device (the “Infringing Product”) which infringe at least one claim of U.S. Patent No. 10,531,728 (“Plaintiff’s Patent” or “the ‘728 patent”) throughout the United States, including within the Commonwealth of Pennsylvania and this district, by operating fully interactive, commercial Internet based e-commerce stores accessible in Pennsylvania, via at least the Amazon.com, eBay.com, Walmart.com, Wish.com or Aliexpress.com Internet market place platforms operating using the seller identities identified on Schedule “A” to the Complaint (the “Seller IDs”).

(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”, and the Third-Party Service Providers and Financial Institutions, in light of Defendants’ intentional and willful offerings for sale and/or sales of Infringing Products (“Application”); and

(B) Order Authorizing Alternative Service on Defendants Pursuant to Federal Rule of Civil Procedure 4(f)(3) (“the Alternative Service Order”);

WHEREAS, upon Plaintiff’s motion, in order to give Plaintiff additional time to serve the Defendants, and to provide the Defendants with sufficient time to respond to the Show Cause Order, this Court extended the initial TRO, re-set the briefing schedule, and re-scheduled the Show Cause Hearing to December 15, 2022.

WHEREAS, pursuant to the terms of the Alternative Service Order, the Defendants have been served with notice of this Show Cause Hearing; and

WHEREAS, on December 15, 2022, Plaintiff appeared for the Order to Show Cause Hearing, however no Defendants appeared. Further, none of the Third-Party Service Provider(s) or Financial Institution(s) appeared.

ORDER

I. Restraining Order

A. IT IS HEREBY ORDERED, as sufficient cause has been shown, the injunctive relief previously granted on November 18, 2022, and extended by further Order, shall remain in place through the pendency of this litigation, and issuing this Preliminary Injunction

(hereafter “PI Order”) is warranted under 35 U.S.C. § 283 and Federal Rules of Civil Procedure 64 and 65.

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 are hereby restrained as follows:

- (1) from (a) their unauthorized and unlicensed use of Plaintiff’s 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

² As defined in the Complaint, a “User Account” is any and all accounts with online marketplace platform, including, Amazon.com, eBay.com, aliexpress.com, Walmart.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.

means of importation, exportation, advertising, marketing, promotion, distribution, and/or 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 cease 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”), and Shopify Inc, (“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)”), and Walmart Pay operated by Wal-Mart.com USA, LLC, 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;⁴

(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;

⁴ 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.

(9) The Third-Party Service Provider(s) and Financial Institution(s) shall further, within five (5) business days of receiving this Order, provide Plaintiff's counsel with all data that 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 Plaintiff's 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 Plaintiff's 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 PI 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 PI Order in accordance with the Alternative Service Order.

B. IT IS HEREBY ORDERED, as sufficient cause has been shown, that upon Plaintiff's 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 Plaintiff's 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 HEREBY ORDERED, as sufficient cause has been shown, that:

- (1) Amazon.com, Inc., and its related companies and affiliates, including Amazon Services, LLC, and Amazon Payments, Inc. (collectively “Amazon”), are hereby restrained and enjoined, pending the hearing and determination of Plaintiff’s Application for a preliminary injunction, or until further order of the Court, from processing payments for any products listed under the following Amazon Standard Identification Numbers (ASIN): B06Y3QSGWP by any Seller that has not been authorized by Plaintiff; Plaintiff shall provide notice to Amazon of Plaintiff’s authorized sellers;
- (2) Amazon.com, Inc., and its related companies and affiliates, including Amazon Services, LLC, and Amazon Payments, Inc., shall place the following Amazon Standard Identification Number B06Y3QSGWP, into Amazon’s gating program, so that Plaintiff will be able to control which sellers list product under these ASINs; and
- (3) upon Plaintiff’s request, any online marketplace that is provided with notice of this Order, including but not limited to the Third-Party Service Provider(s) and Financial Institution(s), shall remove listings and/or advertisements for any product that Plaintiff identifies as infringing on at least one claim of the Plaintiff’s Patent (i.e., preventing a seller from listing the product for sale on the online marketplace);
- (4) The Plaintiff has established that the products as pictured in the attached **Schedule “B”** are either made, used by, offered for sale or sold into the United States and 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, Alibaba.com, wish.com, and shopify.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.

(5) Upon Plaintiff’s request, a Third-Party Service Provider shall remove listings and/or advertisements for any product that infringes on at least one claim of the Plaintiff’s Patent; and

(6) this Order shall remain in effect during the pendency of this action or until further order of the Court.

II. Order Authorizing Expedited Discovery

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

(1) Plaintiff 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 Plaintiff’s counsel.

(2) Plaintiff 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 Plaintiff’s counsel.

(3) Plaintiff 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 Plaintiff's 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 Plaintiff's 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 Plaintiff's Patent.

III. Security Bond

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

IV. Unsealing Order

IT IS FURTHER ORDERED, there being no further reason to keep the case sealed, the Clerk is directed to unseal the case and all the papers on the docket.

SO ORDERED.

SIGNED this ____ day of December, 2022.
Pittsburgh, Pennsylvania

Christy Criswell Wiegand
United States District Judge

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
█	█	█
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	loiqkakq	A2HX9WJAC9P4UG
18	Meejie Cleaning	A2QHMAP40LDUYP
19	Meric Pet Accessories	ABMR3Q27TUP9L
20	mingbaogou	AWML5AK8LYCET
█	█	█
22	Misoongo	A37GGUAUJ5SSQA
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	A3AZEJAHLEMDI
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
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	Zeppo 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
█	█	█
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
█	█	█
106	ezcartllc1	294303336258
107	fehat-53	384871490949, 384866556811
108	gajindkulasingh_0	402874330121
109	galorenmore	353856383597
110	gencoorganics_1	314044865944
111	gighann-0	255268588890
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
█	█	█
125	jivan-impex	295189018589
126	jts_nifty_thrifities	175364558022
127	jujue_bean	152884931504
128	kabi_mart	265229359154
129	kavindud77	144096879088
130	kavlak-40	203582208214
131	kelleigh-1	115085032037
132	loyaltydress	295117034606
133	mangridd	185518492120
134	mete7298	394040839244
135	mik.fredr	115503110695
136	mkfamilyfarmsteadllc	234614664294
137	msonic8017	373718582937
138	nilangika	393524985789
█	█	█
140	practical.choices	124453249712
141	pramono2015	393439761577
142	premium_product_uk	304578475665
143	redberry-0515	384996910520, 385083183690, 385087486969
144	Resellers_km	144685984343
145	rizmanery	294985863035
146	sarathom-46	314094237981
147	sezme-y-0	175393007414
148	shoplc-us	124487132594
149	suneth2002	255399900094

150	superornot	165593348188
151	techmar64	374062287024
152	timothmccubbin0	194187191069
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	5a6854e8ddda8c53f562c28c
180	huasong	585ba527728de61793ea08c4
181	LanXiuLong's Store	5b5a189ef114fc2ac6e4740d
182	lovess	5a53439d149ff83526a4330f
183	mengmeng2457	5f87a4308ce488369fd4b1f8
184	My Smile Power	591a67524b5a470cff52054a
185	Poo Foxx	618dad7b77979285ad5794ff
186	sanyaju	5b457dad044e6a4817a1945b
187	ShopLC	59e4f82772765348701b8716
188	Sulem	5fd9e6b74eed91c9e6370346

189	Tao duo duo nan zhuang	585d1916e18c0f348beaffc8
190	trilighting	5a4745ccda6ce601a76cd25b
191	Tung1964	5f853cc6e91ca716551becba
192	xiaotingmeimeishipin	5b446deb9de0462bd151d30a
193	xionglimei	5a0ff94368788b6e7c046192
194	yetoooo	5adae83954bd094de7d55945
195	yqbuiizaipa	5af258ce4972794e2526d5b6

Schedule "B" Patent Infringing Products

Type 1 Infringing Product



Type 2 Infringing Product

