

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

PAWESOME PET PRODUCTS LLC, et al.,

Plaintiff,

v.

LVLIANG KITCHENWARE STORE, et al.,

Defendants.

Civil Action No.

24-cv-905

(Judge Hornak)

[PROPOSED] PRELIMINARY INJUNCTION ORDER

WHEREAS, on June 26, 2024, Plaintiffs Pawesome Pet Products LLC and Cindy Ghukasyan filed an *Ex Parte* Application seeking 1) a temporary restraining order; 2) an order restraining assets and “Merchant Storefronts”, as defined *infra*; 3) an order to show cause why a preliminary injunction should not issue; and 4) an order authorizing expedited discovery against all of the Defendants identified on the attached Schedule “A”, Alibaba.com US LLC d/b/a Aliexpress.com (“Aliexpress”), Amazon.com, Inc. and its affiliate, Amazon Services LLC d/b/a Amazon.com (“Amazon”), eBay, Inc. d/b/a eBay.com (“eBay”), and Context Logic, Inc d/b/a wish.com (“Wish”) (“Third Party Service Provider(s)”) and AliPay US Inc. d/b/a Alipay.com (“Alipay”), Amazon Payments, Inc. d/b/a pay.amazon.com, and PayPal, Inc. d/b/a paypal.com (“PayPal”) (“Financial Institution(s)”), and Walmart Pay operated by Wal-Mart.com USA, LLC, in light of Defendants’ intentional and willful offerings for sale and/or sales of Infringing Products¹ (“Application”);

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

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

WHEREAS, the Court entered the following Orders:

(A) 1) a temporary restraining order; 2) an order restraining assets and Merchant Storefronts; 3) an order to show cause why a preliminary injunction should not issue; and 4) an order authorizing expedited discovery against all of the Defendants identified on the attached **Schedule “A”**, the Third-Party Service Provider and the Financial Institutions (“TRO”)(July 10, 2024) (ECF No. 22), as amended at ECF No, 23 (amending provisions for cash bond placement); and

(B) an Order Authorizing Alternative Service on Defendants Pursuant to Federal Rule of Civil Procedure 4(f)(3)(June 27, 2024) (ECF No. 16);

Whereas, on July 18, 2024, upon motion of the Plaintiff, the Court extended the TRO and re-set the briefing and show cause hearing (ECF No. 26);

Whereas, the Plaintiff has filed certificates of service confirming that all of the Court’s orders have been posted and served on the Defendants in according with the Alternative Service Order;

WHEREAS, on August 6, 2024 at 3:00 p.m., Plaintiffs appeared for the Order to Show Cause Hearing, however no Defendants appeared. Further, no Third-Party Service Providers or Financial Institutions appeared.

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

ORDER

A. IT IS HEREBY ORDERED, as good and sufficient cause has been shown, the injunctive relief previously granted on July 10, 2024, and extended, shall remain in place through the pendency of this litigation or until further order of this Court, and there is good and sufficient cause for issuing this Preliminary Injunction under 35 U.S.C. § 283, Federal Rules of Civil Procedure 64 and 65, and The All Writs Act, 28 U.S.C. § 1651(a). The Court finds that Plaintiffs rely upon a presumptively valid patent, and that nothing in the record calls that validity into question. The evidence establishes that Plaintiffs have shown a sufficient likelihood of success on the merits of this action. The Court also concludes that Plaintiffs have shown that immediate and irreparable injury, loss, and damage will likely result should the relief entered by this Order not be granted. Specifically, the Court finds that Defendants' infringing products are likely to continue to cause Plaintiffs to suffer loss profits, compromise the value of Plaintiffs' brand, and negatively effect Plaintiffs' relationships with its current customers and its ability to attract new customers. Defendants will not be harmed by the imposition of the injunctive relief requested, because the injunction only prohibits Defendants from taking actions they are otherwise not entitled to perform under the law. And finally, the public interest favors the issuance of the requested injunction, and Plaintiffs have no adequate remedy at law for the immediate and irreparable harms identified.

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

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

² As defined in the Application, a "User Account" is, as defined in the Complaint, any and all accounts with at least one of the online marketplace platform(s), Amazon.com, eBay.com, Aliexpress.com, 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.

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") ("Third Party Service Provider(s), Walmart Pay operated by Walmart.com USA, LLC, ("Walmart")") and Zhejiang Ant Small and Micro Financial Services Group Co., Ltd. AliPay (China) Internet Technology Co. Ltd., and Alipay.com

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

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

(9) The Third-Party Service Provider(s) and Financial Institution(s) shall further, within five (5) business days of receiving this Order, provide Plaintiff’s counsel with all data that details (i) an accounting of the total funds restrained and identifies the financial

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

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

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; (in order to confirm compliance with this Order, the Plaintiff is permitted leave to serve a subpoena on such Third Party Service Provider(s) and Financial Institution(s) seeking the following information: (a) Bank account and routing numbers registered and used with regard to each seller account; (b) Financial records and other documents identifying the use of third-party payment service providers such as Payoneer and Wise; (c) Dates when funds were last sent from the seller to their seller account and the respective amount transferred; (d) Dates when funds were last sent from the seller account to the seller and the respective amount transferred; (e) amount and location of the seller's assets that are in Amazon's control; and (f) all documents identifying the Defendants;

(10) Upon Plaintiffs' request, any Internet marketplace who is provided with notice of this Order, including but not limited to the Third Party Service Provider(s) and Financial Institution(s), shall immediately cease fulfillment of and sequester Defendants' inventory assets corresponding to the Seller IDs identified on Schedule "A" hereto in its inventory,

possession, custody, or control, and hold such goods in trust for the Court during pendency of this action;

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

(12) Defendants and all financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to the Third Party Service Provider(s) and the Financial Institution(s), subject to this Order may petition the Court to modify the asset restraint set out in this Order; and

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

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

(1) secreting, concealing, transferring, disposing of, withdrawing, encumbering or paying Defendants' Assets from or to financial accounts associated with or

utilized by any Defendant or any Defendant's User Accounts or Merchant Storefront(s) (whether said account is located in the U.S. or abroad) ("Defendants' Financial Accounts") until further ordered by this Court; and

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

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

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

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

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

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

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

II. Order Authorizing Expedited Discovery

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

- (1) Plaintiffs may propound interrogatories pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, and Defendants, their respective officers, employees, agents, servants and attorneys, and all persons in active concert or participation with any of them, who receive actual notice of this Order, shall provide written responses under oath to such interrogatories within fourteen (14) days of service to Plaintiffs’ counsel.
- (2) Plaintiffs may serve requests for the production of documents pursuant to FRCP 26 and 34, and Defendants, their respective officers, employees, agents, servants and attorneys, and all persons in active concert or participation with any of them, who receive actual notice of this Order, shall produce all documents responsive to such requests within fourteen (14) days of service to Plaintiffs’ counsel.
- (3) Plaintiffs may serve requests for admissions pursuant to FRCP 26 and 36, and Defendants, their respective officers, employees, agents, servants and attorneys, and all

persons in active concert or participation with any of them, who receive actual notice of this Order, shall provide written responses under oath to such requests within fourteen (14) days of service to Plaintiffs' counsel.

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

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

Financial Accounts associated with Defendants' User Accounts and Defendants' Merchant Storefronts⁷;

- (4) Defendants' unauthorized and unlicensed use of Plaintiffs' Patent; and
- (5) all online marketplaces, including but not limited to, Amazon.com, ebay.com, Joybuy, aliexpress.com, Temu, Walmart.com, and wish.com, shall, in the event a request for takedown or delisting of Plaintiff's Product occurs, upon receipt of this Order, immediately relist or otherwise reinstate Plaintiff's Product so that they may be purchased on the online marketplace.

III. Security Bond

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

IV. Unsealing Order

WHEREAS, the reasons for keeping the documents in this case sealed no longer exist, it is FURTHER ORDERED that the Clerk of Court is hereby directed to unseal all the documents previously filed under seal in this case.

SO ORDERED.

SIGNED this ____ day of July, 2024, at _____ .m.
Pittsburgh, Pennsylvania

MARK R. HORNAK
CHIEF UNITED STATES DISTRICT JUDGE

⁷ The data produced to Plaintiff shall include the data and documents required to be collected by the Federal Trade Commission, pursuant to 15 U.S.C. § 45f; *See also* Pennsylvania Unfair Trade Practices and Consumer Protection Law, 73 P.S. §§ 201-1, *et seq.* (Requiring Third Party Service Providers to collect and keep records pertaining to identities and locations of high volume sellers, as well as financial documents)

Schedule “A”
Defendants With Store Name and Seller ID

Defendant Number	Store/Seller Name	Seller ID
1	Lv Liang kitchenware store	101675698
2	Aiperq	101651976
3	cckkykgn	101644080
4	fanggeziqu	101652879
5	FASLMH	101106761
6	GeLan12	101642304
7	GUANGNAN Technology Co., Ltd.	101300508
8	guangxitanlie	101646572
9	jinanming	101676651
10	jinanyanqiukejizixun	101683561
11	JY shop	101591806
12	LaMaz	101610657
13	LeDongst	101597103
14	SHNWU	101613849
15	suohe852	101675908
16	SYINGQIAN	101689215
17	taichengjiankang	101646520
18	TaiYuanShiDanYouShangMao	101609518
19	Tianlan	101675267
20	weiqian	101645700
21	XiHAMA2023	101522486
22	xinfabanjin	102492088
23	XMEIJIE	101689882
24	YangBiYing12	101642295
25	Yurney	101688205
26	ZIME	101302712
27	3C PLUS DropShipping Store	1101988440
28	Alice Pet Home Store	1102418174
29	Amigo Go Shop1102719897 Store	1102720906
30	Beisite Store	1102906731
31	Coolbear Store	1102524529
32	Cosima and Kira Store	1101714862

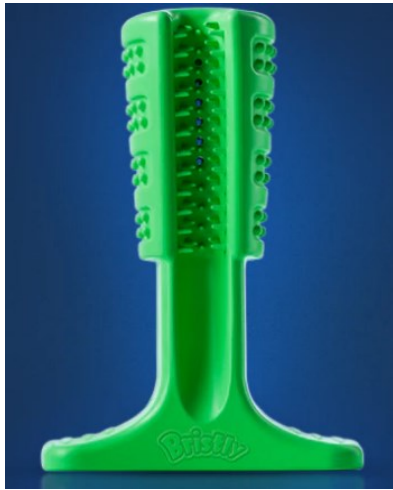
Defendant Number	Store/Seller Name	Seller ID
33	Cutie Pet Store	1103241096
34	CYGJ Pet Store	1102732130
35	De Kutwal Home Decor Store	1102938084
36	FW Housewear And Rain Gear Store	1101618446
37	Hallo you Store	1101357650
38	Have Integrity Store	1102516981
39	Herbalscandybox Store	1102684546
40	HOCOSHINE Store	1103017133
41	Homey Homie Store	1101288098
42	-Interesting life Store	1101931707
43	Kid-Three Store	1102529392
44	KONG PET TOY Store	1101603958
45	KUDI Pet Supplies Official Store	1102644678
46	Malotti Pet Supplies Store	1103305568
47	MeiIKEA Home Furnishings Store	1102663206
48	Ming Nuo Home Store	1102528444
49	more buy Store	1102244137
50	Oriental Pet Store	1102057043
51	Pets Happiness Life Store	1101735643
52	PetStar Store	1103573738
53	Shop1102697005 Store	1102688508
54	Shop1102904122 Store	1102900176
55	Shop1103056217 Store	1103051267
56	Shop1103755325 Store	1103756180
57	Shop1748437 Store	1101042013
58	SONFRUT Store	1101717597
59	Surprise Life Store	1101227874
60	Sur-Soul Store	1103139076
61	Urban Home Store	1102658311
62	Warm Life Household Store	1102588494
63	Warm Little Shop Store	1103728233
64	Xiao Qi Store	1101756068
65	XIZOU-NO5 Store	1102018228
66	Yikuu Store	1101450656
67	YiNiu Three Store	1103086034
68	Zhouyi Store	1103378095

Defendant Number	Store/Seller Name	Seller ID
69	AHTR STORE	A1D1RFSKB2S1C7
70	Boyka1899	AM1V0RS86XRIS
71	CAPIWASKA	ALMXUMJG7I6O9
72	CHENJIE1	A24ZU6PFAT2K2C
73	ChuanJieShop	A1N78197U11X9N
74	cozy hoome	AAJKHQCV2PB6N
75	Daily Present	A1N870RSTLA9KV
76	Eternal Empire	A3A9474L06N4J6
77	FranCoin	A271OMGVSNLO3B
78	FTM SUPLLY	A16UW0V5VXX6N3
79	GGSTSL	AVQZfZ4PPAOT6
80	Gjldjne	A3UVYYUWSN3NY6
81	guangzhouzechenyuncangcangchuyouxiangongsi	A2JXDD60SHETUO
82	H K A MUSTAFA	A2UAQKCL2U71XL
83	Haikou Jiaile Department Store	A1HKR96K5RS83X
84	HOME FUSION PRO LLC	A2QMVA2MJFUGF8
85	IGTO	A1JSG6SS7R2WAT
86	InWorld	A1F7R6742I2A4I
87	kisuin	A3CS6Y9AMOAQQY
88	Krthi Stores	A3S42567QWYT64
89	Menoli Store	ABVG1LNOB6XWF
90	MuXueBinJiaJu	A3N9FY0PHH7837
91	nicedaily	A18XJCUMKLG96
92	ningchengxianhuihengdedianzishangwushanghang	A2TDHAL3UY4ALJ
93	OHEPFD	A10LIV73T7P5TY
94	Oinkein	A1XBU0YUHBKD9
95	PingXiangShiYuLingKuaJingDianZiShangWuYouXianGongSi	A2ZEYW1MV11NGE
96	RCA Home Products	A1ANU0267SZOKI
97	Rewyta	A8HVLRQVXL4I6
98	RUIXURUIXU LLC	A1CP1SO5JOU9E2
99	saneze	A113XIBFCABWE3
100	Sellium Store	AFMGR6CAI1SQG
101	Shaww Juu	AFKGY5BEPRJO5
102	ShenZhenShiRuiXinHongKeJiYouXianGongSi	A2MQA26YNHRNG8
103	SINCREX	A210QBPC58IJOM

Defendant Number	Store/Seller Name	Seller ID
104	SKAI-SHOP	A3STT5B54NOJ0N
105	STRACKER MART	APLI7V9PQ0UVD
106	Ten Bagger	ALYG20SJ13BX3
107	TRSM SHOP	A1ULL2BK4P4KJY
108	WANGAODZ	A2MCZYR5ZWZLBT
109	WWCCXX	A1R1FTP2Z7Q34
110	yukashangmaoweq	A1UYOVJV58CY6I
111	ZOEN	A3D06MKPKU1VMY
112	HAPPY CAI	634418214271215
113	JIXINXX	634418216073075
114	Nopesh Intelligent	5453560542401
115	Pet Luck Fen	634418214018541
116	Yiduoduopc	634418215261107
117	OBTOOLS	592e9a9a7fcf2d351b66b407
118	jiangliRR	5c149f44d6de137dec617f6e
119	Fenglinjoy66	58a2e83f2302674f3ad635ee

Schedule "B" Patent Infringing Products

Plaintiffs' Product



Type 1 Infringing Product



Plaintiffs' Product



Type 2 Infringing Product



Plaintiffs' Product



Type 3 Infringing Product

