

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

PUSHPEEL LLC,

Plaintiff,

v.

THE LOYAL WINDOW, et al.,

Defendants.

Case No. 25-cv-1957

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

Pushpeel LLC (“Pushpeel” or “Plaintiff”) hereby sues Defendants, the Individuals, Partnerships, and Unincorporated Associations identified on Schedule “A” (collectively “Defendants”). All Defendants have infringed, and continue to infringe, one or more of the claims of Plaintiff’s United States Patent No. 12,478,892 (“the ‘892 patent”) by manufacturing, importing, offering for sale, and/or selling infringing sensorial activity toys (the “Infringing Products”) on the Amazon.com online marketplace, operating under the seller identities and/or the online marketplace accounts as set forth on **Schedule “A”** hereto (the “Seller IDs” and collectively, the “Defendant Merchant Storefronts”). In support of its claims, Plaintiff alleges as follows:

NATURE OF ACTION

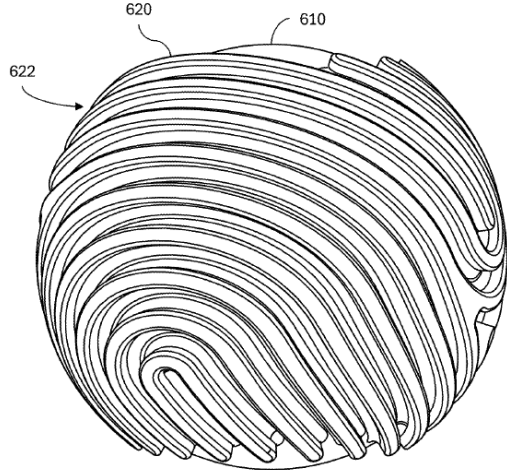

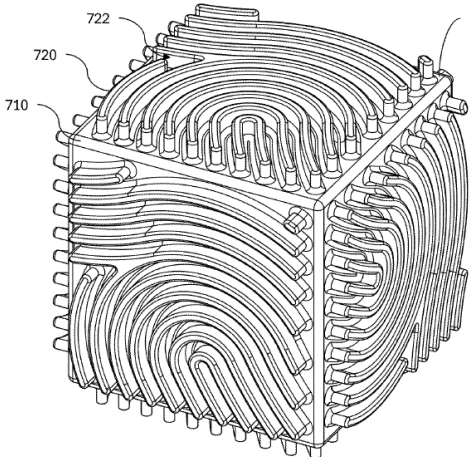

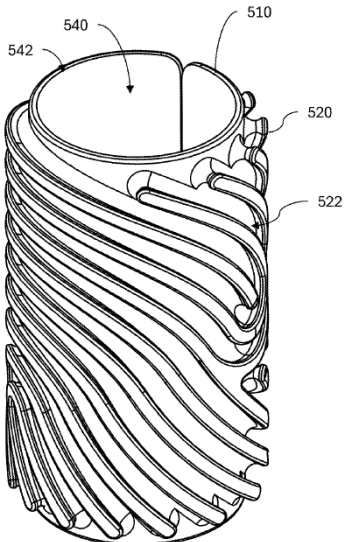

1. Plaintiff sells a fidget toy for calming, stress, anxiety, attention-deficit/hyperactivity disorder, and autism. An example of Plaintiff’s product appears below:



Plaintiff’s product provides a screen-free, tactile experience with silicone strings on a surface, allowing users to push, peel, loop, and create patterns to relieve stress, improve focus, and develop fine motor skills, hand-eye coordination, and problem-solving. Plaintiff primarily sells its product through the Amazon.com online marketplace.

2. Plaintiff is the owner of the ‘892 patent, one or more of the claims of which are infringed by Defendants. Below is a side-by-side comparison of figures of the ‘892 patent showing different embodiments and examples of Defendants’ products that infringe:

Figure No.	Figure	Example of Defendants’ Product <i>Type 1</i>
Fig. 1A		

Figure No.	Figure	Example of Defendants' Product
Fig. 6		<p style="text-align: center;">Example of Defendants' Product <i>Type 2</i></p> 
Fig. 7		<p style="text-align: center;"><i>Type 3</i></p> 
Fig. 5		<p style="text-align: center;"><i>Type 4</i></p> 

JURISDICTION AND VENUE

3. The Infringing Products are substantially identical to each other and the same in all respects to infringement of the '892 patent.

4. This Court has original subject-matter jurisdiction over the claims in this action pursuant to the provisions of the Federal Patent Act, 15 U.S.C. § 101, et seq., 28 U.S.C. § 1338(a)–(b), and 28 U.S.C. § 1331.

5. Personal jurisdiction over each Defendant satisfies constitutional due process because, upon information and belief, each Defendant has sold products that infringe Plaintiff's '892 patent to consumers within Pennsylvania not affiliated in any way with Plaintiff through the regular course of business, with the knowledge that Plaintiff is harmed in Pennsylvania as a result of its sales of infringing products to Pennsylvania residents. In addition, each Defendant has been willing to accept an order for a product that infringes Plaintiff's '892 patent from a representative of Plaintiff with a Pennsylvania address, to ship the product to that representative in Pennsylvania, and to collect Pennsylvania sales tax. Plaintiff's claims arise out of and relate to Defendants' offers to sell and sales of products that infringe Plaintiff's '892 patent to Pennsylvania residents through the regular course of business.

6. Personal jurisdiction over each Defendant also satisfies constitutional due process because the causes of action asserted herein, including patent infringement, are intentional torts, were aimed at Pennsylvania, and caused harm that each Defendant should have anticipated would be suffered by Plaintiff in Pennsylvania.

7. Personal jurisdiction over each Defendant satisfies the Pennsylvania long-arm statute, and therefore Rule 4(k)(1)(A) of the Federal Rules of Civil procedure. The Pennsylvania long-arm statute provides for jurisdiction "to the fullest extent allowed under the Constitution of

the United States and may be based on the most minimum contact with this Commonwealth allowed under the Constitution of the United States.” 42 Pa. Cons. Stat. § 5322(b). The Pennsylvania long-arm statute is, therefore, coextensive with the Due Process Clause.

8. Upon information and belief, Defendants have cooperated, communicated, shared information, and coordinated their efforts in order to create an infringing marketplace operating in parallel to the legitimate marketplace of Plaintiff and third parties authorized to sell products embodying Plaintiff’s patented invention, including employing and benefitting from substantially similar paid advertising, marketing, and advertising strategies (*e.g.*, search engine optimization or “SEO”), in order to make their online storefronts appear more relevant and target a consumer searching for products embodying Plaintiff’s patented invention. By their actions, in addition to the damages associated with unauthorized use of Plaintiff’s patent invention, Defendants are causing concurrent and irreparable harm to Plaintiff and the consuming public by: (1) reducing the online visibility of Plaintiff’s patented invention; (2) diluting and eroding the retail market price for Plaintiff’s patented invention; (3) causing overall degradation of the value of goodwill associated with Plaintiff’s patented invention; (4) devaluing the exclusivity that enhances the worth of Plaintiff’s patented invention and Plaintiff’s reputation; and (5) increasing Plaintiff’s overall cost to market its goods and educate consumers about Plaintiff’s patented invention.

9. Upon information and belief, Defendants are aware of Plaintiff and Plaintiff’s patent and are aware that their infringement is likely to cause harm to Plaintiff in Pennsylvania.

10. Plaintiff is suffering irreparable and indivisible injury and has suffered substantial damages as a result of Defendants’ unauthorized sale of the Infringing Products in direct competition with Plaintiff.

11. By virtue of the civil conspiracy claim in Count II of this Complaint, the Pennsylvania contacts of each Defendant are imputed to every other Defendant because, upon information and belief, each Defendant was aware of, or should have been aware of, the actions of the other co-conspirators.

12. By virtue of the civil conspiracy claim in Count II of this Complaint and the allegations of coordinated actions by Defendants, Plaintiff's claims against Defendants arise out of the same series of transactions and occurrences.

13. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(c)(3). Defendants do not reside in the United States and are subject to venue in any district. Further, Defendants solicit business from this Judicial District and, upon information and belief, conduct and transact significant business in this Judicial District.

INTRODUCTION

14. Plaintiff is the owner of the '892 patent that protects Plaintiff's patented invention. Sayer Murphy, the owner of Plaintiff, invented, designed, developed, marketed, and sold the first toy marketed as a sensory activity board. Indeed, Mr. Murphy coined the term "sensory activity board." Mr. Murphy is the named inventor on the '892 patent.

15. Plaintiff filed this action to combat online infringers who trade upon Plaintiff's reputation, goodwill, and valuable patent by selling and/or offering for sale products infringing Plaintiff's patented invention. In addition, Defendants are selling unauthorized products that are based on and derived from the patented invention of the '892 patent.

16. The '892 patent was issued on November 25, 2025 and is valid, subsisting, and in full force and effect. A true and correct copy of the '892 patent is attached hereto as **Exhibit 1**.

17. In an effort to illegally profit from the creative content of Plaintiff's invention, Defendants have created numerous Defendant Merchant Storefronts and designed them to appear to be selling products that are authorized by Plaintiff.

18. The Defendant Merchant Storefronts share unique identifiers, such as design elements and similarities of the unauthorized products offered for sale. Defendants attempt to avoid liability by going to great lengths to conceal both their identities and the full scope and interworking of their illegal operation. Plaintiff is forced to file this action to combat Defendants' piracy of Plaintiff's invention. Plaintiff has suffered, and continues to suffer, irreparable harm due to the loss of control over the quality and creative content of Plaintiff's valuable patented invention, as well as damage to Plaintiff's reputation, goodwill, and ability to license as a result of Defendants' actions. Accordingly, Plaintiff seeks injunctive and monetary relief.

19. The rise of online retailing, coupled with the ability of sellers on e-commerce sites to hide their identities, has made it nearly impossible for Plaintiff to undertake non-litigation policing actions because taking advantage of takedown procedures to remove infringing products would be an ineffective and endless game of whack-a-mole against the mass piracy that is occurring over the internet. The aggregated effect of the mass piracy that is taking place has overwhelmed Plaintiff and Plaintiff's ability to police Plaintiff's rights against the dozens of anonymous defendants who are selling illegal infringing products at prices well below an original.

20. To be able to offer the infringing products at a price substantially below the cost of original, while still being able to turn a profit after absorbing the cost of manufacturing, advertising, and shipping requires an economy of scale only achievable through a cooperative effort throughout the supply chain. As Homeland Security's recent report confirms, infringers act

in concert through coordinated supply chains and distribution networks to unfairly compete with legitimate brand owners while generating huge profits for the illegal pirating network:

Historically, many counterfeits were distributed through swap meets and individual sellers located on street corners. Today, counterfeits are being trafficked through vast e-commerce supply chains in concert with marketing, sales, and distribution networks. **The ability of e-commerce platforms to aggregate information and reduce transportation and search costs for consumers provides a big advantage over brick-and-mortar retailers. Because of this, sellers on digital platforms have consumer visibility well beyond the seller's natural geographical sales area.**

...
Selling counterfeit and pirated goods through e-commerce is a highly profitable activity: production costs are low, millions of potential customers are available online, transactions are convenient, and listing on well-branded e-commerce platforms provides an air of legitimacy.

...
The impact of counterfeit and pirated goods is broader than just unfair competition. Law enforcement officials have uncovered intricate links between the sale of counterfeit goods and transnational organized crime. **A study by the Better Business Bureau notes that the financial operations supporting counterfeit goods typically require central coordination**, making these activities attractive for organized crime, with groups such as the Mafia and the Japanese Yakuza heavily involved. Criminal organizations use coerced and child labor to manufacture and sell counterfeit goods. In some cases, the proceeds from counterfeit sales may be supporting terrorism and dictatorships throughout the world.

See Department of Homeland Security, *Combating Trafficking in Counterfeit and Pirated Goods*, Jan. 24, 2020, (<https://www.dhs.gov/publication/combating-trafficking-counterfeit-and-pirated-goods>), at 10, 19 (emphasis added) attached hereto as **Exhibit 2**.

21. The Defendant Merchant Storefronts share unique identifiers, such as design elements and similarities of the unauthorized products offered for sale, establishing a logical relationship between them and suggesting that Defendants' illegal operations arise out of the same transaction, occurrence, or series of transactions or occurrences. Defendants use aliases to avoid liability by going to great lengths to conceal both their identities as well as the full scope and

interworking of their illegal network. Despite deterrents such as takedowns and other measures, the use of aliases enables infringers to stymie authorities:

The scale of counterfeit activity online is evidenced as well by the significant efforts e-commerce platforms themselves have had to undertake. A major e-commerce platform reports that its proactive efforts prevented over 1 million suspected bad actors from publishing a single product for sale through its platform and blocked over 3 billion suspected counterfeit listings from being published to their marketplace. Despite efforts such as these, private sector actions have not been sufficient to prevent the importation and sale of a wide variety and large volume of counterfeit and pirated goods to the American public.

...

A counterfeiter seeking to distribute fake products will typically set up one or more accounts on online third-party marketplaces. The ability to rapidly proliferate third-party online marketplaces greatly complicates enforcement efforts, especially for intellectual property rights holders. Rapid proliferation also allows counterfeiters to hop from one profile to the next even if the original site is taken down or blocked. On these sites, online counterfeiters can misrepresent products by posting pictures of authentic goods while simultaneously selling and shipping counterfeit versions.

...

Not only can counterfeiters set up their virtual storefronts quickly and easily, but they can also set up new virtual storefronts when their existing storefronts are shut down by either law enforcement or through voluntary initiatives set up by other stakeholders such as market platforms, advertisers, or payment processors.

Id. at 5, 11, 12.

22. Plaintiff has been and continues to be irreparably harmed through the loss of control over Plaintiff's reputation, goodwill, ability to license, and the quality of goods featuring the Plaintiff's invention, as well as the devaluation of the exclusivity associated with Plaintiff's invention and professional reputation. The rise of eCommerce as a method of supplying goods to the public exposes brand holders and content creators that make significant investments in their products to significant harm from counterfeiters:

Counterfeiting is no longer confined to street-corners and flea markets. The problem has intensified to staggering levels, as shown by a recent Organization for Economic Cooperation and Development (OECD) report, which details a 154 percent increase in counterfeits traded internationally — from \$200 billion in 2005 to \$509 billion in 2016. Similar information collected by the U.S.

Department of Homeland Security (DHS) between 2000 and 2018 shows that seizures of infringing goods at U.S. borders have increased 10-fold, from 3,244 seizures per year to 33,810.

...

The rise in consumer use of third-party marketplaces significantly increases the risks and uncertainty for U.S. producers when creating new products. It is no longer enough for a small business to develop a product with significant local consumer demand and then use that revenue to grow the business regionally, nationally, and internationally with the brand protection efforts expanding in step. Instead, with the international scope of e-commerce platforms, once a small business exposes itself to the benefits of placing products online — which creates a geographic scope far greater than its more limited brand protection efforts can handle — it begins to face increased foreign infringement threat.

...

Moreover, as costs to enter the online market have come down, such market entry is happening earlier and earlier in the product cycle, further enhancing risk. If a new product is a success, counterfeiters will attempt, often immediately, to outcompete the original seller with lower-cost counterfeit and pirated versions while avoiding the initial investment into research and design.

...

Counterfeiters have taken full advantage of the aura of authenticity and trust that online platforms provide. While e-commerce has supported the launch of thousands of legitimate businesses, their models have also enabled counterfeiters to easily establish attractive “store-fronts” to compete with legitimate businesses.

See Combating Trafficking in Counterfeit and Pirated Goods, Jan. 24, 2020, (**Exhibit 2**) at 4, 8,

11.

23. Not only are the creators and patent owners harmed, the public is harmed as well:

The rapid growth of e-commerce has revolutionized the way goods are bought and sold, allowing for counterfeit and pirated goods to flood our borders and penetrate our communities and homes. Illicit goods trafficked to American consumers by e-commerce platforms and online third-party marketplaces threaten public health and safety, as well as national security. This illicit activity impacts American innovation and erodes the competitiveness of U.S. manufacturers and workers. The President’s historic memorandum provides a much warranted and long overdue call to action in the U.S. Government’s fight against a massive form of illicit trade that is inflicting significant harm on American consumers and businesses. This illicit trade must be stopped in its tracks.

Id. at 3, 4. (Underlining in original).

THE PLAINTIFF

24. Plaintiff has expended substantial time, money, and other resources developing, advertising, and otherwise promoting Plaintiff's invention. Plaintiff has also invested substantial time, money, and effort in building up and developing consumer awareness, goodwill, and recognition in the Plaintiff's invention. As a result, reproductions associated with Plaintiff are recognized and exclusively associated by consumers, collectors, the public, and the trade as authorized by Plaintiff.

25. The success of the Plaintiff's invention is due in large part to Plaintiff's marketing, promotional, and distribution efforts.

26. As a result of Plaintiff's efforts, the quality of Plaintiff's products, the promotional efforts for Plaintiff's products and designs, press and media coverage, and social media coverage, members of the public have become familiar with the Plaintiff's invention and associate Plaintiff's invention exclusively with Plaintiff.

27. Plaintiff has made efforts to protect Plaintiff's interests in and to Plaintiff's invention. No one other than Plaintiff and Plaintiff's licensees are authorized to manufacture, import, export, advertise, create derivative works, offer for sale, or sell any goods embodying Plaintiff's invention without the express written permission of Plaintiff or Plaintiff's representative.

28. Plaintiff is engaged in the business of distributing a variety of products throughout the world, including within Pennsylvania. Plaintiff, either directly or indirectly, offers for sale and sells Plaintiff's products within the Commonwealth of Pennsylvania, including via the Internet on <https://www.amazon.com>. Defendants, through the advertising, offering for sale, and sale of infringing versions of Plaintiff's invention are directly and unfairly competing with

Plaintiff's economic interests in the Commonwealth of Pennsylvania and causing Plaintiff irreparable harm and damage within this jurisdiction.

29. Plaintiff suffers ongoing daily and sustained violations of Plaintiff's '892 patent at the hands of infringers such as Defendants who wrongfully offer for sale, reproduce, and infringe Plaintiff's patented invention. The natural and intended byproduct of Defendants' combined actions is the erosion and destruction of the goodwill associated with Plaintiff's name in Pennsylvania and brand and the destruction of the legitimate market sector in Pennsylvania in which Plaintiff operates. Defendants' marketing and sales of their infringing products in Pennsylvania directly and adversely affects Plaintiff's sales and profits in Pennsylvania.

THE DEFENDANTS

30. Defendants are individuals and business entities who, upon information and belief, reside in the People's Republic of China or other foreign jurisdictions or distribute goods from foreign jurisdictions. Defendants conduct business throughout the United States, including within Pennsylvania and in this judicial district, through the operation of the fully interactive commercial websites and online marketplaces operating under the Defendant Merchant Storefronts. Each Defendant targets the United States, including Pennsylvania, and has offered to sell and, on information and belief, has sold and continues to sell illegal reproductions of the Plaintiff's Works to consumers within the United States, including Pennsylvania and in this judicial district.

31. Defendants directly engage in infringing one or more of the claims of Plaintiff's '892 patent by advertising, offering for sale, and/or selling goods to consumers within Pennsylvania through e-commerce stores using, at least, the Defendant Merchant Storefronts, as well as additional ecommerce store or seller identification aliases not yet known to Plaintiff. Defendants have purposefully directed some portion of their unlawful activities toward consumers

in the Commonwealth of Pennsylvania through the advertisement, offer to sell, sale, and/or shipment of infringing versions of patented invention into Pennsylvania.

32. Defendants are using Plaintiff's patented invention to drive Internet consumer traffic to their e-commerce stores operating under the Defendant Merchant Storefronts, thereby decreasing the size and value of Plaintiff's legitimate Pennsylvania marketplace and intellectual property rights.

THE DEFENDANTS' UNLAWFUL CONDUCT

33. The success of the Plaintiff's patented invention has resulted in significant copying of the creative content protected by Plaintiff's '892 patent. Plaintiff has identified numerous fully interactive marketplace listings for infringement of one or more claims of Plaintiff's '892 patent on Amazon.

34. Upon information and belief, Defendants facilitate sales by designing the Defendant Merchant Storefronts so that they appear to unknowing consumers to be authorized online retailers, outlet stores, or wholesalers selling genuine versions of Plaintiff's patented invention.

35. The Defendant Merchant Storefronts intentionally conceal their identities and the full scope of their piracy operations in an effort to deter Plaintiff from learning Defendants' true identities and the exact interworking of Defendants' illegal operations. Through their operation of the Defendant Merchant Storefronts, Defendants are directly and personally contributing to, inducing, and engaging in the sale of Infringing Products as alleged, often times as partners, co-conspirators, and/or suppliers. Upon information and belief, Defendants are an interrelated group of infringers working in active concert to knowingly and willfully manufacture, import, distribute, offer for sale, and sell Infringing Products.

36. Upon information and belief, at all times relevant hereto, the Defendants in this action have had full knowledge of Plaintiff's ownership of the '892 patent, including Plaintiff's exclusive right to use and license such intellectual property and the goodwill associated therewith.

37. Infringers often go to great lengths to conceal their identities by often using multiple fictitious names and addresses to register and operate their massive network of Defendant Merchant Storefronts. Upon information and belief, Defendants regularly create new websites and online marketplace accounts on Amazon and other online marketplaces using the identities listed in Schedule A to the Complaint as well as other unknown fictitious names and addresses. Such Defendant Internet Store registration patterns are one of many common tactics used by the Defendants to conceal their identities and the full scope and interworking of their massive pirating operations and to avoid being shut down.

38. The Infringing Products for sale in the Defendant Merchant Storefronts bear similarities and indicia of being related to one another, suggesting that the Infringing Products were manufactured by and come from a common source and that, upon information and belief, Defendants are coordinating and working in concert to profit from Plaintiff's protected intellectual property.

39. In addition to operating under multiple fictitious names, Defendants in this case and defendants in other similar cases against online infringers use a variety of other common tactics to evade enforcement efforts. For example, infringers like Defendants will often register new online marketplace accounts under new aliases once they receive notice of a lawsuit. Infringers also typically ship products in small quantities via international mail to minimize detection by U.S. Customs and Border Protection. A 2021 U.S. Customs and Border Protection report on seizure

statistics indicated that e-commerce sales accounted for 13.3% of total retail sales with second quarter of 2021 retail e-commerce sales estimated at \$222.5 billion. U.S. Customs and Border Protection, *Intellectual Property Right Seizure Statistics*, FY 2021 (<https://www.cbp.gov/sites/default/files/assets/documents/2022-Sep/202994%20-%20FY%202021%20IPR%20Seizure%20Statistics%20BOOK.5%20-%20FINAL%20%28508%29.pdf>) at 23. A true and correct copy of CBP's FY 2021 report is attached hereto as **Exhibit 3**. In FY 2021, there were 213 million express mail shipments and 94 million international mail shipments. *Id.* Nearly 90 percent of all intellectual property seizures occur in the international mail and express environments. *Id.* at 27. The “overwhelming volume of small packages also makes CBP’s ability to identify and interdict high risk packages difficult.” *Id.* at 23.

40. Further, Infringers such as Defendants typically operate multiple credit card merchant accounts and third-party accounts, such as PayPal, Inc. (“PayPal”) accounts, behind layers of payment gateways so that they can continue operation in spite of Plaintiff’s enforcement efforts. Upon information and belief, Defendants maintain offshore bank accounts and regularly move funds from their PayPal accounts to offshore bank accounts outside the jurisdiction of this Court. Indeed, analysis of PayPal transaction logs from previous similar cases indicates that offshore infringers regularly move funds from U.S.-based PayPal accounts to foreign-based bank accounts, such as China-based bank accounts, outside the jurisdiction of this Court.

COUNT I

DIRECT PATENT INFRINGEMENT

41. Plaintiff repeats and incorporates by reference herein the allegations contained in the above paragraphs of this Complaint.

42. Each Defendant has directly infringed, and continues to infringing, at least independent claim 1 of the '892 patent. (See Exhibit 4, claim charts comparing the text of Claim 1 of the '892 patent to each of the Infringing Products).

43. Defendants' Infringing Products are toys.

44. Defendants' Infringing Products comprise a platform defined by at least a surface, a first channel, and a second channel not rectilinearly parallel to the first channel, each of the first channel and the second channel including a first sidewall of a first protrusion extending from the surface and a second sidewall of a second protrusion extending from the surface, wherein optionally the first protrusion or the second protrusion of the first channel corresponds to one of the first protrusion or the second protrusion of the second channel.

45. Defendants' Infringing Products comprise a discrete flexible member being cylindrical along at least a partial length thereof and having a thickness such that a bulk of the discrete flexible member is releasably securable along the partial length thereof within the first channel or the second channel such that at least a portion of the discrete flexible member is curvilinear, wherein the discrete flexible member has a cross-sectional profile having a circumdiameter less than a length of the discrete flexible member.

46. Pursuant to 35 U.S.C. § 287, Plaintiff has complied with the marking provisions of the Patent Act.

47. Plaintiff is entitled to recover damages adequate to compensate it for such infringement but in no event less than a reasonable royalty for Defendants' infringement of the '892 patent, together with interest and costs.

48. The patent application that matured into the '892 patent was published as U.S. Patent Application Publication No. 20250288918 on October 19, 2025.

49. Each Defendants had actual notice of U.S. Patent Application Publication No. 20250288918.

50. The claims of U.S. Patent Application Publication No. 20250288918 and the '892 patent are substantially identical.

51. The foregoing acts of infringement constitute a collective enterprise of shared, overlapping facts and have been willful, intentional, and in disregard of and with indifference to the rights of the Plaintiff.

52. As a result of each Defendant's infringement of Plaintiff's exclusive rights, Plaintiff is entitled to relief pursuant to 15 U.S.C. § 284, including enhanced damages, and to Plaintiff's attorneys' fees and costs pursuant to 15 U.S.C. § 285.

53. The conduct of each Defendant is causing and, unless enjoined and restrained by this Court, will continue to cause Plaintiff great and irreparable injury that cannot fully be compensated or measured in money. Plaintiff has no adequate remedy at law. Pursuant to 15 U.S.C. § 283, Plaintiff is entitled to injunctive relief prohibiting each Defendant from further infringing Plaintiff's '892 patent and specifically enjoining further importation, offer for sale, and sale of Infringing Products in the United States.

COUNT II
CIVIL CONSPIRACY

54. Plaintiff repeats and adopts and incorporates by reference herein the allegations contained in the above paragraphs of this Complaint.

55. Plaintiff is informed and believes and therefore alleges upon information and belief that Defendants knowingly and voluntarily entered into a scheme and agreement to engage in a combination of unlawful acts and misconduct including, without limitation, a concerted and

collaborated effort to maintain the distribution, marketing, advertising, shipping, and sale of products that infringe at least one claim of Plaintiff's '892 patent.

56. The intent, purpose, and objective of the conspiracy and the underlying combination of unlawful acts and misconduct committed by the Defendants was to unfairly compete against Plaintiff and to profit from Plaintiff's intellectual property.

57. Each Defendant understood and accepted the foregoing scheme and agreed to do its respective part to further accomplish the foregoing intent, purpose, and objective. Thus, by entering into the conspiracy, each Defendant has deliberately, willfully, and maliciously permitted, encouraged, and induced all of the foregoing unlawful acts and misconduct.

58. As a direct and proximate cause of the unlawful acts and misconduct undertaken by each Defendant in furtherance of the conspiracy, Plaintiff has sustained, and unless each Defendant is restrained and enjoined, will continue to sustain severe, immediate, and irreparable harm, damage, and injury for which Plaintiff has no adequate remedy at law.

59. As a result of Defendants' actions alleged herein, Plaintiff is entitled to injunctive relief, an order granting Plaintiff's damages and disgorging Defendants' profits stemming from their false advertisements, and exemplary or punitive damages for Defendants' intentional misconduct.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

1) That Defendants, their affiliates, officers, agents, employees, attorneys, and all persons acting for, with, by, through, under, or in active concert with them be temporarily, preliminarily, and permanently enjoined and restrained from:

- a. promoting, advertising, distributing, having manufactured, importing, offering for sale, and selling Defendants' Infringing Products; and
- b. using, linking to, transferring, selling, exercising control over, or otherwise owning the Defendant Merchant Storefronts, or any other online marketplace account that is being used to sell products or inventory not authorized by Plaintiff which infringe at least one claim of Plaintiff's '892 patent.

2) Entry of an Order that, upon Plaintiff's request, those in privity with Defendants and those with notice of the injunction, including any online marketplaces, social media platforms, Facebook, YouTube, LinkedIn, Twitter, internet search engines such as Google, Bing, and Yahoo, web hosts for the Defendant Merchant Storefronts, shall:

- a. disable and cease providing services for any accounts through which Defendants engage in the sale of products not authorized by Plaintiff which infringe at least one claim of Plaintiff's '892 patent, including any accounts associated with the Defendants listed on Schedule A;
- b. disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of products that infringe at least one claim of Plaintiff's '892 patent; and
- c. take all steps necessary to prevent links to the Defendant accounts identified on Schedule A from displaying in search results, including, but not limited to, removing links to the Defendant accounts from any search index;

3) For judgment in favor of Plaintiff against Defendants declaring that they have: a) willfully infringed Plaintiff's rights in the claims of the '892 patent; and b) otherwise injured the

business reputation and business of Plaintiff by Defendants' acts and conduct set forth in this Complaint;

4) For judgment in favor of Plaintiff against Defendants for actual damages and enhanced damages in an amount to be determined at trial, together with interests and costs as fixed by the Court;

5) That Plaintiff be awarded Plaintiff's reasonable attorneys' fees and costs;

6) That Plaintiff be awarded punitive damages; and

7) Award any and all other relief that this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff respectfully demands a trial by jury on all claims.

Respectfully submitted,

Dated: December 16, 2025

/s/ Stanley D. Ference III

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Attorneys for Plaintiff

LIST OF EXHIBITS

- Exhibit 1 Registration certificates for the Plaintiff's Works
- Exhibit 2 Department of Homeland Security, *Combating Trafficking in Counterfeit and Pirated Goods*, Jan. 24, 2020 (<https://www.dhs.gov/publication/combating-trafficking-counterfeit-and-pirated-goods>)
- Exhibit 3 U.S. Customs and Border Protection, *Intellectual Property Right Seizure Statistics*, FY 2021
(<https://www.cbp.gov/sites/default/files/assets/documents/2022-Sep/202994%20-%20FY%202021%20IPR%20Seizure%20Statistics%20BOOK.5%20-%20FINAL%20%28508%29.pdf>)
- Exhibit 4 Claim Charts

Schedule “A”**Defendants with Store Name and Seller ID**

Defendant Number	Store/Seller Name	Seller ID
1	The Loyal Window	AWHTNLTXHFD9K
2	ACCEVO-US	AVNRQ3YEOJ187
3	AGSDGAWD Store	A1NIO1NO83TH7D
4	Amycoco-us	A3RDYOZSK4G3EY
5	ARTSEEA	A1YBJK5P8O0IBH
6	ASON-US	A39W07TWMGPFZR
7	AUDRWALL	A2380Y7I8GK28
8	Baby Happytime	A3T1SPD667YGQS
9	Baileyi	A2DDTWBWWL5L1G
10	BELLESTILE	A3MAX0ML1728MW
11	BUGGI-US	A2LTFEOLB6X3GD
12	BUSYBABY007	A3JVV6AF05SIKL
13	Calm Palm Toys	A1RKAYL3AEK14O
14	Chanlee	A3FTSI4BVXJADB
15	CHEATCODE YOYO	A3PHS5345CAFY8
16	CHENYANLAN-US	AJB11MPUNWT4L
17	Cherislpy	A8B649PH56U63
18	CORPER TOYS	A2P9YDBZPGBEZE
19	crystalcity	A2CN50WZWWEDEJO
20	DA G	A3HL9BYAUF927
21	DLRbest	A17URO7NXBKBZJ
22	DoDoMagXanadu	A9HWYGT32V06A
23	DYMYGONGSI	A3CFP0I9AYZO5W
24	Dzy Mall	A2XRE6G00H84J
25	Fhyisble-US	A2T1P5TT98EYDJ
26	Fresh Find Merch	AXAYOKFON90H9
27	FUNSENLY	A2BVU5R5B8QXF8
28	Goltion	A3SCJR5FXPLCST
29	Handewo	A2PHAN9LK5SZI9
30	HAPATOYS	APDGKI0ORVHE1
31	HAWKIN	A32FCRWP2UXBJA
32	HELLO PAPAYA-US	AQOGWB1BS4LU4
33	Helsort Direct	A2U9SIX099Z4FV
34	Hola Star	A17ANUY7S7A9RM
35	HongCN	ASND4Q1F0Z21S
36	Hotmaiway	A1819ZUNXDAB3
37	HUSUN	A2X6QJ1RTSRDN9
38	Inawenxlg	A1M1WF6W5JNMLY

39	Jikuyu	A3D2IUAE15S451
40	JxtararDirect	ATQBKAUQO9J9S
41	Keculf shop	A34ATOKEXB1ZYM
42	KIDHABE	A310XV425YT67B
43	Kinizuxi	AM1S7YPE00F7Q
44	Know White	A3HRVLM7EC860X
45	Kraftdeals	A2TXYIOLELE0SJ
46	Kunzen	AUQ4GR4KZH26
47	LCNRGB	A6CQC9HTW3N9J
48	Liangc shopping	AMM6D4V6B7D8Y
49	Lianmei - US	A3CO52RGQW0P18
50	Lielyhod	A1RB76MV3T23L8
51	LightHue Workshop	A3SH5A0219DZSB
52	MAKOL	A13BD6K5E61QIC
53	MAX LOVIN	APZWX40S3QPG7
54	Mdd US Shop	A29SITD3WQ59PN
55	Memorical	A101YVN2VAXIQ3
56	Mookiraer Direct	AG3F99WBGHKNUN
57	M-SanTang	A3M32BUQI4WGTW
58	MSLANE	A34219D0RA4IV9
59	mumoon	A3EVRHM0R9257L
60	NiuZi-cao	A1PJ1MHERP4SYI
61	Panda SmartBuy	A34JDHU9YQZFA0
62	Peibai	A2C8MKQTT8AGDJ
63	Platinum Hub	A3UTN531RYATKP
64	PLUVOGE	ACBA9GD1YAXP
65	PRLUNVS	AZMLKJ49YHZ9G
66	Puzzle toys-US	A1M15LMEGR5ZOS
67	Qingyushangmao	A2O756FTX2DWWF
68	RadBizz	A3VRR311BHJLPC
69	Refun Store	A2APLBTVDSUWNH
70	RIOSTY	A199OS5CWORYCO
71	RonXn Apostle	A22JX5J9G9FRKP
72	Sensory4u	A3AAYA4P01YIJV
73	ShungRu	A1735JUKYDKCJC
74	Silicone US	A2VPXJ3SDPZ0RU
75	Skillssist	A3OMM9VVTZ2TFH
76	StimuVariety	AKTDNWIJR5LL
77	sunfany	A1PQ66J882YM3A
78	Sunshine KK Ltd	A1TWK6B20NPDIF
79	tansuzhonghe	A65A4NS4YD6GJ
80	Three Arrows Premium	AOLBJR5UQEZQ7
81	Tianyoukeji	A1Y8GUYUIROF6U
82	TollyHub	AHPVND56NIYDX
83	Udihch	A2SOSYC93NQKZZ
84	veeuedoi	A1U6SJMLOFA0GU

85	VESTIA	AHXEXHM79IOE6
86	Winning Trading Ltd	A1805WFTBV6B80
87	WoodsyNest	AXNWKEI8QV6TW
88	Wrj-yusendongchen	A1NOIJ98SDSO9F
89	XiQiCYun	A131WVLGBE5YPX
90	XUANYAXUAN	A1GGG3BVFU5NWC
91	xxsmplx	A15HNNNEHBN9E07
92	Yangku-US	A2HXRAW1NZC2QA
93	YEENO	A2M8SB246XD5IH
94	Yisryerow	A36NNCNSIZ3ONK
95	YixingUS Store	A3GWHV16H7HCLG
96	YoPoLL	ALGSN7XRZYJ4W
97	YuxierDirect	A24YZP5RO1ZK22
98	BabyHome Store	1104696817
99	BabyOne Store	1104199442
100	Childhood Dreaminess Store	911140291
101	Children Education Sports	1102908610
102	Colorful Childhood Toy v Store	910897044
103	CozyJoy Store	1103860462
104	Growth-Diary Store	1100034002
105	Home-Treasure Store	5606505
106	HOSPORT Art House Store	1103631551
107	Jikpach Store	1103356157
108	Kitchen Dinning Store	911142266
109	Lets Make Handmade Store	1269345
110	let's make Mother&Baby Store	3215018
111	Lucker kitchen Store	1102894319
112	My Childhood World Store	2901299
113	My LovelyHome Store	5240292
114	Quick Push Toy Store	1102907176
115	Shop KnowledgeKeys Store	1104655551
116	Shop1102179203 Store	1102179203
117	Shop1102982509 Store	1103646046
118	Shop1103439742 Store	1103439742
119	Shop1103593025 Store	1103593025
120	Shop1103785199 Store	1103785199
121	Shop1103833555 Store	1103833555
122	Shop1104038656 Store	1104038656
123	Shop1104060817 Store	1104060817
124	Shop1104901078 Store	1104901078
125	Shop1104998498 Store	1104998498
126	Shop1105194459 Store	1105194459
127	SweetPea Baby Store	1103477221
128	VOCOO Choice Store	1104208459
129	Wonder Toys House Store	1103779129
130	XDR Official Store	5081011

131	Xiao'jinyu Store	912016635
132	YKS Happy Toy Factory Store	1104910655
133	YKS Kids Toy Dropshipping Store	1103237115
134	YKS Toy Supermarket Store	1103188216
135	Yuhaohui Store	1102603928
136	ZDQ Lifestyle Products Store	1104903193
137	99centmegadeals	147168657833
138	ABC Liquidation H quality Low cost	388183503188
139	aiakosonline	326951660177
140	Aivnatae	317645871757
141	Bargain Hut Resale	396192619679, 396192614134
142	BEST SELLER TOP SELLER	366227973298
143	Betterkarma	127329009099
144	Bruinhans	187709425057
145	cindyl5178	127345962826
146	CrowsNestCo	317262144520
147	Dealdo	197840095388
148	DealTier Direct	127629971332
149	deeli	297945686614
150	DiamondGirlDealz	277333228037
151	Emily's Whimsical Nightmare	277675079297
152	Figgypopman	406542965940
153	FingerTen-63CLUB	317493430735
154	gammaws5gifts	236309544141
155	Grandma Chicken Attic Treasures	397460185384
156	Husky77777	397532740677
157	janneyboutique	317771814783
158	Johnsmallstore	156982150172
159	junioakintund-0	267053206903
160	LCL2003	297776025928
161	Lilly Clementine's	157143481818
162	linxianfengwangluo	387272833372
163	MajesticMorganStudio	157528637581
164	MegaMegaSavings	267565472940
165	mke_25	187240546700
166	mman1426	1778444434757
167	My Family Crest	376817410210
168	Nashville Dealz	227202611115
169	Nett's Nook	167129384801
170	OCM Store	389297688160
171	Penderlea Antiques and More	326979623288
172	PrettyNDiamonds004	127654061778
173	QCPJ	286988414300
174	Rafabot	287137036663
175	rios_deals	388079747389
176	S and J Gift Shop	146362879882

177	southernvintage95	168176778604
178	szheng126	356258294715
179	T.O-DealsShop	406728045529
180	theshantypyle	267512373778, 267512372537, 267512374567
181	Thrift Loop 487	206095333068
182	tllf73	177268638080, 177267941419, 177268687868
183	Toy Store TS	376778217241
184	VIGOR	226482561194
185	ABGHJSZ	634418216942589
186	ANDAAEGS	634418225358324
187	CarsWorld	634418211949659
188	Cathernia	634418211566556
189	CCi AllPocket	634418211895236
190	Cocoi Kids	634418218514152
191	Hodad Case	634418221870190
192	I MK Technology	634418212705873
193	In Between	634418219996038
194	Interest Happy Toys	634418221090027
195	LIAOZIJUN	634418224261167
196	Lumify Life	634418220503819
197	NeslGenc	146569915015
198	New Feel	5959825213898
199	OTTOYS	5121121645256
200	PET CX	634418221787235
201	QDBSJKBT	634418223332588
202	Simple Finds	634418215772912
203	SportsOutdoor	4938539958299
204	The Last Ode to Freedom	634418225266591
205	TWShop	634418213442554
206	XIANGLINGA	634418226000463
207	xiao qing xin	394103835567
208	XingGeiYang	634418211414742
209	Yaduny	634418224154525
210	BEINONGNUO	101651378
211	DoDoMagXanadu	101090649
212	FUN EXPRESS	101003129
213	GROBRO7	102616350
214	Haooryx	101196616
215	HUMJUSE	101629934
216	JiEnYu	101688259
217	Ixiao	101674319
218	MAGICYOYO Direct	101441569
219	Miuhuy	101673032
220	Paulus	102911736

221	RedSun	101129623
222	Rirool Studio	101199324
223	ToyNexus	103037843
224	XI-ecom	101099572
225	XYX Ecommerce Co LTD	101196699
226	Chair cover store	5d4e5aec1d9a8e7500306327
227	GrobalChildren toys industrial	549fc2eb24db571ea5d91b4f
228	Happy life store	57a07ba53a698c619bd1bc20
229	Home Improvement Store	5d4e60e73db43e20797ee0a6
230	kiki love	5832e05204df991b794fe4de
231	Pet wonderland	5a2778af34e7207a65d59065
232	Playful Cute Store	55eea4bbc48d9d4260518e00
233	Playmotion Store	689c57976b9648dff4802069
234	satin pillowcase Shop	5449a5825f313f676a366dc5
235	Textile stores	60444a19aacee43754d828a7
236	Tool stores	5975f255e2bfde0b5927aa49
237	UTR I could be the one	58ec78a81211f52c7906c60c