Case	8:22-cv-00984-DOC-DFM Document 1 Filed 05/13/22 Page 1 of 52 Page ID #:1						
1	John K. Rubiner – State Bar No. 155208						
2	jrubiner@fmglaw.com FREEMAN, MATHIS & GARY, LLP 550 South Hope Street, Suite 2200						
3	Los, Angeles, California 90071-2631 Telephone: (213) 615-7000						
4	Facsimile: (213) 615-7100						
5	John Zaccaria ( <i>pro hac vice</i> to be filed) <i>jzaccaria@notaromichalos.com</i>						
6	Alan Federbush (pro hac vice to be filed) alan.federbush@notaromichalos.com						
7	NOTARO MICHALOS & ZACCARIA P.C. 100 Dutch Hill Road, Suite 240						
8	Orangeburg, NY 10962 Telephone: (845) 359-7700						
9	Facsimile: (845) 359-7798						
10	Attorneys for Plaintiff E. Mishan & Sons, Inc.						
11	UNITED STATES DISTRICT COURT						
12	CENTRAL DISTRICT OF CALIFORNIA						
13	E. Mishan & Sons, Inc., : Civil Action No.						
14	Plaintiff,						
15	v. : COMPLAINT FOR COPYRIGHT : AND PATENT INFRINGEMENT						
16	P2 Trading, Inc., and : Daniel Yang, : JURY TRIAL DEMANDED						
17	Defendants. : x						
18							
19	E. Mishan & Sons, Inc. ("Emson" or "Plaintiff"), for its Complaint against						
20	P2 Trading, Inc. ("P2 Trading") and Daniel Yang (together "Defendants") alleges						
21	as follows.						
22	<b>Nature of the Action</b>						
23	1. This is an action for (i) copyright infringement arising under the						
24	Copyright Act of 1976, 17 U.S.C. § 1, et seq., and for (ii) patent infringement						
25	arising under the patent laws of the United States, 35 U.S.C. § 1, et seq.						
26	<u>The Parties</u>						
27	2. Emson is a New York corporation organized and existing under the						
28	laws of the State of New York with its principal place of business at 230 Fifth						
	- 1 -						
	COMPLAINT FOR PATENT AND COPYRIGHT INFRINGEMENT						

Avenue, Suite 800, New York, New York 10001.

2 3. On information and belief, P2 Trading is organized and existing under
3 the laws of the State of California with a place of business at 17115 Alburtis
4 Avenue, Artesia, California 90701.

- 4. On information and belief, Daniel Yang ("Yang") is an individual
  residing at 1741 N. Pheasant St., Anaheim, California 92806. Yang is the CEO and
  registered agent of P2 Trading.
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### **Jurisdiction and Venue**

5. This Court has subject matter jurisdiction over this action pursuant to
28 U.S.C. §§ 1331 and 1338(a). Alternatively, this Court has subject matter
jurisdiction pursuant to 28 U.S.C. § 1332 because Emson, on one hand, and P2
Trading and Yang, on the other hand, are citizens of different states and the matter
in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

Kenue is proper in this district pursuant to 28 U.S.C. § 1400 because,
on information and belief, both defendants reside in California, and Defendants
have committed acts of infringement in this district, and, on information and belief,
have a regular and established place of business in this district.

18 7. This Court has personal jurisdiction over the Defendants because both 19 Defendants reside in California and in this judicial district; the claims asserted 20 herein arose in this judicial district and/or because the Defendants transact business 21 within this district and have committed infringing acts complained of hereinafter 22 within this district, because Defendants derive substantial revenue from interstate 23 commerce and have committed acts of copyright infringement and patent 24 infringement both within and without this district having injurious consequences 25 within this district, and Defendants are otherwise within the jurisdiction of this 26 Court.

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- 2 -

Jase	#:3
1	Statement of Facts
2	A. Emson's Bell + Howell Disk Lights
3	8. Emson is in the business of designing, manufacturing and selling
4	consumer household products, including outdoor solar powered LED lights which
5	are sold under the trademark "Bell + Howell Disk Lights."
6	9. The Bell + Howell Disk Lights are used in landscapes, along pathways
7	and on walls, railings or stairs to provide portable light where needed.
8	10. The Bell + Howell Disk Lights are marketed and sold in different
9	styles, including the paver stone design (hereinafter "Paver Stone Disk Light")
10	shown below.
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12	A President
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21	Paver Stone Disk Light
22	11. Emson sells the Bell + Howell Disk Lights throughout the United
23	States directly to consumers and to nationwide retailers for resale to consumers.
24	B. <u>Emson's Copyright</u>
25	12. The Paver Stone Disk Light Work was created for Emson in 2018.
26	Photographs of the Paver Stone Disk Light Work are attached as Exhibit A.
27	13. On or about August 30, 2018, Emson applied to the Register of
28	Copyrights for a Certificate of Registration for the Paver Stone Disk Light Work.
	- 3 -
	COMPLAINT FOR DATENT AND CODUDICIT INFRINCEMENT

The Certificate was duly issued by the Register of Copyrights entitled "Decorative
 Lawn Sculpture IV" with an effective date of August 30, 2018 and bearing
 Registration No. VAu 1-328-679. A true and accurate copy of Registration No.
 VAu 1-328-679 is attached as Exhibit B.

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14. Emson is the sole owner of all rights, title and interest in and to the copyright in the Paver Stone Disk Light Work.

7 15. The Paver Stone Disk Light Work is an original creation and8 constitutes copyrightable subject matter under the Copyright Act.

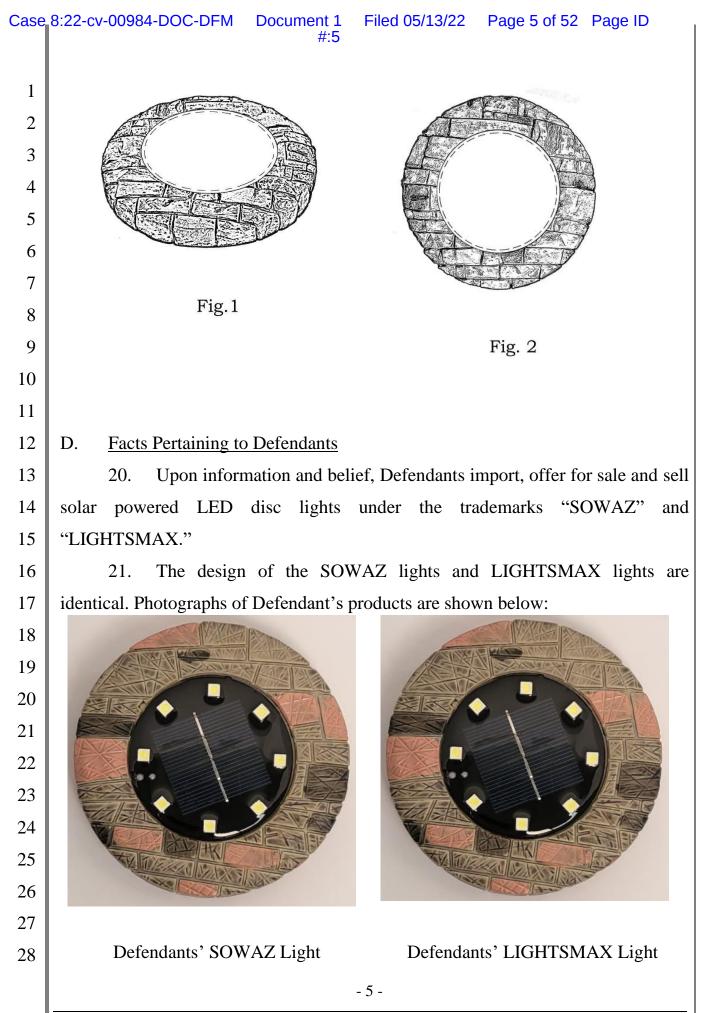
9 16. Emson has duly complied with all relevant requirements of the
10 Copyright Act with respect to the Paver Stone Disk Light Work and the certificate
11 of registration issued in connection with that design is valid and subsisting.

12 C. <u>Emson's Patent</u>

17. United States Design Patent No. D842,521 ("the D'521 Patent")
14 entitled "Paver Stone Disk Light" duly and legally issued on March 5, 2019. A true
15 and correct copy of the D'521 Patent is attached as Exhibit C.

16 18. Emson is the owner by assignment of all right, title, and interest in the17 D'521 Patent.

18 19. The D'521 Patent claims the ornamental design for a light as shown
and described in the seven figures of Exhibit C. Figures 1 and 2 of the D'521
Patent are reproduced below:



COMPLAINT FOR PATENT AND COPYRIGHT INFRINGEMENT

22. The SOWAZ and LIGHTSMAX lights are offered for sale and sold in
 this judicial district, and throughout the United States, on at least websites at the
 URLs <u>www.lowes.com</u>, <u>www.homedepot.com</u>, and <u>www.pestsdefender.com</u>. On
 information and belief, <u>www.pestsdefender.com</u> is owned by P2 Trading. True and
 accurate copies of web pages downloaded from websites on which the Defendants'
 lights are offered for sale are attached hereto as Exhibit D.

7 23. Defendants' SOWAZ Lights are distributed and sold in packaging
8 which includes infringing images of the SOWAZ lights. The packaging for
9 Defendants' SOWAZ Lights is shown below.

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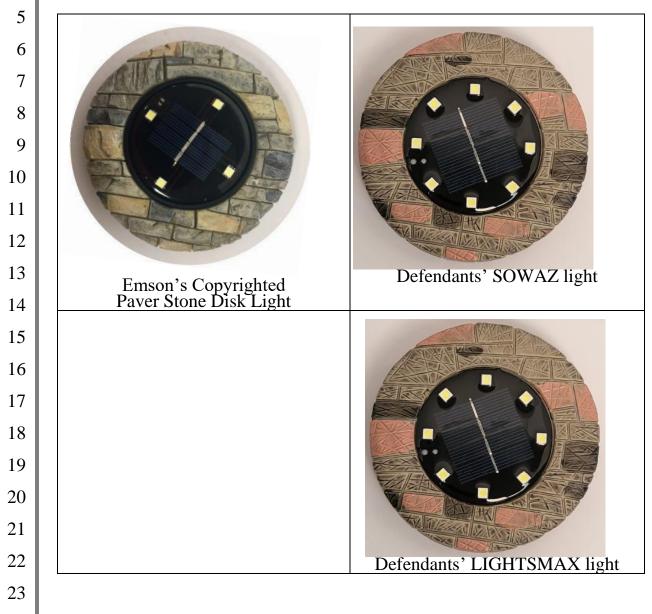


## Defendant's SOWAZ Lights Packaging

20 24. On February 16, 2021, Emson sent Defendants a cease and desist letter
21 notifying Defendants of the D'521 Patent, the VAu 1-328-679 copyright
22 registration, and Defendants' infringing activities. Emson is informed and believes
23 and thereon alleges that the letter was received by Defendants on February 17, 2021
24 and therefore Defendants have been on actual notice of Emson's intellectual
25 property rights and Defendants' infringing activities at least as early as the receipt
26 of the cease and desist letter.

27 25. Upon information and belief, Defendants had access to the work28 protected by the Paver Stone Disk Light copyright well before the creation of the

SOWAZ and LIGHTSMAX Lights. The similarity is so exact as to preclude any
 possibility that the SOWAZ and LIGHTSMAX lights were not copied from
 Emson's copyrighted Paver Stone Disk Light. Emson's Paver Stone Disk Light and
 Defendants lights are shown side-by-side, below.



24 26. Upon information and belief, Defendants directly or indirectly
25 manufactured, marketed, imported, distributed and/or sold lights that are identical
26 and/or strikingly similar to, or substantially similar to, the Paver Stone Disk Light
27 copyrighted work.

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27. Defendants have infringed and willfully continue to infringe Emson's
 Paver Stone Disk Light copyrighted work by deliberately manufacturing,
 marketing, importing, distributing, and/or selling the SOWAZ and LIGHTSMAX
 lights.

5 28. Defendant had access to Plaintiff's Paver Stone Disk Light prior to
6 importing, making, distributing and/or selling the Sowaz and Lightsmax lights.

7 29. Without Plaintiff's permission and in violation of the Plaintiff's rights,
8 the Defendants have caused the reproduction, manufacture, promotion, importation,
9 and/or sale of the SOWAZ and LIGHTSMAX lights that are copied from, derived
10 from, and strikingly similar to and/or substantially similar to Plaintiff's registered
11 design and have infringed upon the Plaintiff's original copyrighted work.

12 30. As a direct and proximate result of Defendants' acts of infringement,13 Emson has suffered damages.

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31. Defendants' acts of infringement have been and continue to be willful.

15 32. Defendants are not licensed or authorized by Emson to make, sell,
16 offer to sell, use or import the infringing SOWAZ or LIGHTSMAX lights.

## FIRST CLAIM FOR RELIEF

## Copyright Infringement (VAu 1-328-679)

## (Against All Defendants)

20 33. Emson repeats and re-alleges the allegations of paragraphs 1-32 of this
21 Complaint as if set forth fully herein.

34. This is a claim for copyright infringement arising under the copyright
law of the United States, 17 U.S.C. § 101 *et seq*.

24 35. Upon information and belief, Defendants had access to the work
25 protected by Emson's Paver Stone Disk Light copyright before the creation of the
26 SOWAZ and LIGHTSMAX lights.

27 36. Defendants have infringed and are now infringing Emson's28 copyrighted work, by directly or indirectly, reproducing, copying, causing or

authorizing the manufacture, manufacturing, importing, distributing, and/or selling
 without Emson's consent, lights that are identical, strikingly similar to, or
 substantially similar to, and infringing Emson's Paver Stone Disk Light copyright.

4 37. Plaintiff is entitled to recover from the Defendant the damages it has
5 sustained and will sustain, and any gains, profits, and advantages obtained by the
6 Defendants, as a result of its acts of infringement as alleged herein.

7 38. Plaintiff has been damaged by the Defendants' acts in an amount as
8 yet unknown. Plaintiff will be irreparably damaged by the continued acts of the
9 Defendants unless Defendants are enjoined, and Plaintiff has no adequate remedy at
10 law.

## SECOND CLAIM FOR RELIEF Infringement of United States Design Patent No. D842,521

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## (Against All Defendants)

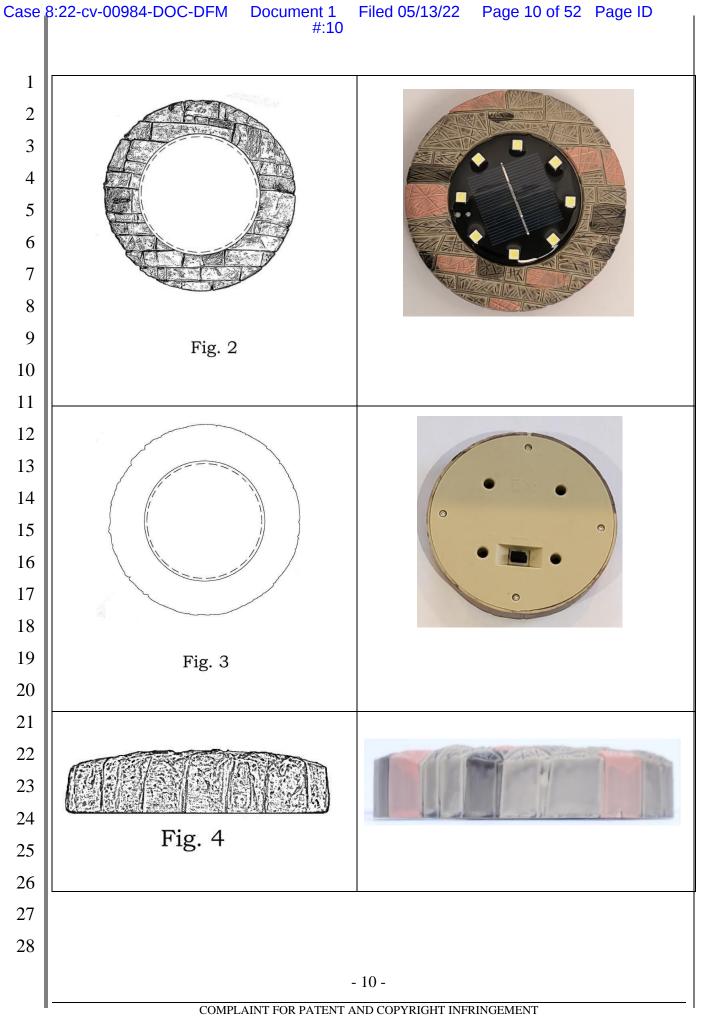
14 39. Emson repeats and re-alleges the allegations of paragraphs 1-38 of this15 Complaint as if set forth fully herein.

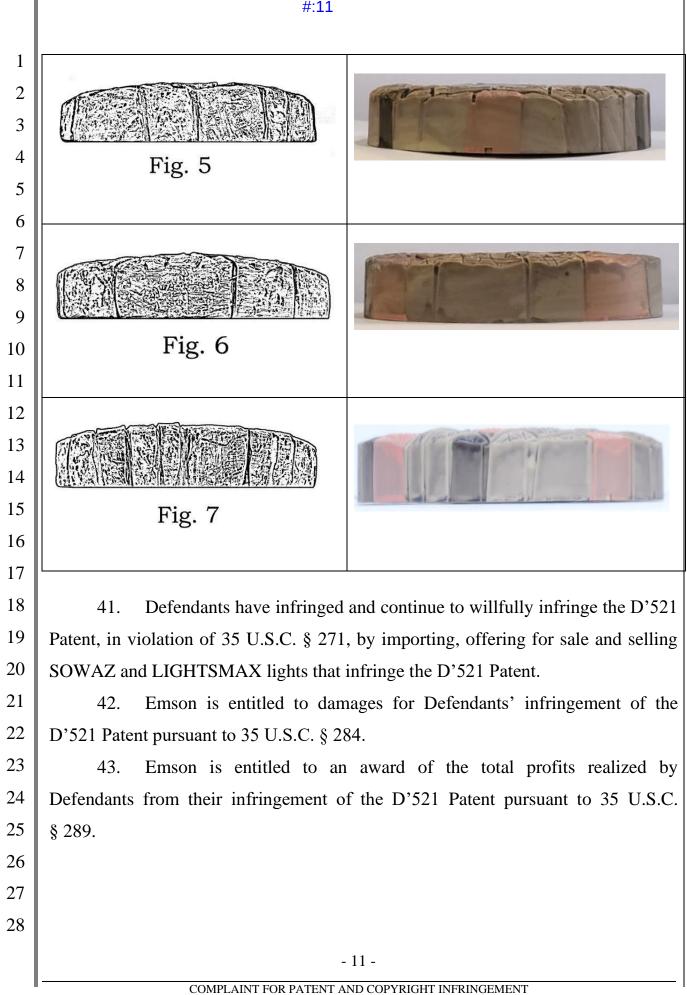
16 40. The table below compares the figures of the D'521 Patent with the17 Defendants' lights:

18	D'521 Patent	Defendants' Lights				
19		ALC THE STREET				
20		Alter State In				
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22						
23	VIEDY					
24						
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26	Fig.1					
27	1 18.1					
28						
		- 9 -				
l	COMPLAINT FOR PATENT AND COPYRIGHT INFRINGEMENT					









44. Defendants' acts are willful, intentional and malicious and with
 knowledge of Emson's rights in the D'521 Patent and with knowledge that the
 SOWAZ and LIGHTSMAX lights are infringing.

4 45. Defendants' infringement of the D'521 Patent has caused and, unless
5 enjoined and restrained by this Court, will continue to cause, irreparable injury to
6 Emson that is not fully compensable in monetary damages and for which Emson
7 has no adequate remedy at law. Emson is therefore entitled to preliminary and
8 permanent injunctions enjoining Defendants from further infringement of the D'521
9 Patent.

## PRAYER FOR RELIEF

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WHEREFORE, E. Mishan & Sons, Inc. respectfully requests that this Court
enter judgment in its favor, against Defendants and grant the following relief:

- A. An order adjudging Defendants to have willfully infringed Copyright Registration No. VAu 1-328-679 (hereafter the "Emson Copyright") pursuant to 17 U.S.C. § 501;
- 17 Β. Judgment against Defendants for preliminary and permanent injunctions pursuant to 17 U.S.C. § 502, 18 19 enjoining Defendants and their officers, agents, servants, 20 employees, and attorneys, and all other persons in active 21 concert, privity or participation with any of them from (a) 22 importing, selling, offering for sale, selling and/or 23 distributing the products accused of infringing the Emson 24 Copyright and any products that are not colorably 25 different from those products, and (b) from directly or 26 indirectly infringing the Emson Copyright;
  - C. An order requiring Defendants to account to Emson for all gains, profits, and advantages derived by Defendants

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from their infringement of the Emson Copyright or such damages as are proper, and an award of actual damages and profits pursuant to 17 U.S.C. § 504(b);

- D. At the election of Emson pursuant to 17 U.S.C § 504(c), statutory damages of at least one-hundred and fifty thousand dollars (\$150,000), for Defendants' willful infringement of the Emson Copyright;
- E. An order that all material infringing the Emson Copyright, including but not limited to Defendants' SOWAZ and LIGHTSMAX Lights, packaging and printed materials, be impounded and destroyed, pursuant to 17 U.S.C. § 503;
  - F. An award of Emson's costs, reasonable attorneys' fees, and disbursements in this action, pursuant to 17 U.S.C. § 505;
  - G. A judgment that Defendants have infringed and are infringing U.S. Design Patent No. D842,521 (hereafter the "Emson Patent") under 35 U.S.C. § 271;
- H. A judgment awarding damages adequate to compensate Emson for Defendants' infringement under 35 U.S.C. § 284, including pre-judgment and post-judgment interest, costs, and damages for any post-verdict infringement occurring prior to entry of a final judgment;
  - I. A judgment that Defendants' infringement of the Emson Patent has been willful and awarding Emson treble damages under 35 U.S.C. § 284;
    - J. A judgment awarding Emson the total profits realized by Defendants from their infringement of the Emson Patent

1		pursuant to 35 U.S.C. § 289;		
2	K.	An order enjoining Defendants and their officers, agents,		
3		servants, employees, and attorneys, and all other persons		
4		acting in concert or participation with any of them, from		
5		directly or indirectly infringing the Emson Patent in any		
6		manner;		
7	L.	A judgment that this is an exceptional case under 35		
8		U.S.C. § 285 and awarding Emson its reasonable		
9		attorney's fees and costs;		
10	М.	A judgment awarding E. Mishan & Sons, Inc. its costs		
11		under 28 U.S.C. § 1920; and		
12	N.	Such other and further relief as this Court may deem just		
13	and proper.			
14				
15	May 12, 2022	Respectfully submitted,		
16	Widy 12, 2022	/s/ John K. Rubiner		
17		John K. Rubiner - State Bar No. 155208		
18		jrubiner@fmglaw.com FREEMAN, MATHIS & GARY, LLP		
19		550 South Hope St., Suite 2200		
20		Los Angeles, CA 90071-2631 Telephone: 213-615-7000 Facsimile: 213-615-7100		
21		John Zaccaria ( <i>pro hac vice</i> to be filed)		
22		<i>jzaccaria@notaromichalos.com</i> Alan Federbush ( <i>pro hac vice</i> to be filed)		
23		alan.federbush@notaromichalos.com NOTÁRO MICHALOS & ZACCARIA P.C.		
24		100 Dutch Hill Road, Suite 240 Orangeburg, NY 10962		
25		Telephone: (845) 359-7700 Facsimile: (845) 359-7798		
26		Attorneys for Plaintiff		
27		E. MISHAN & SONS, INC.		
28				
		- 14 -		
I		COMPLAINT FOR PATENT AND COPYRIGHT INFRINGEMENT		

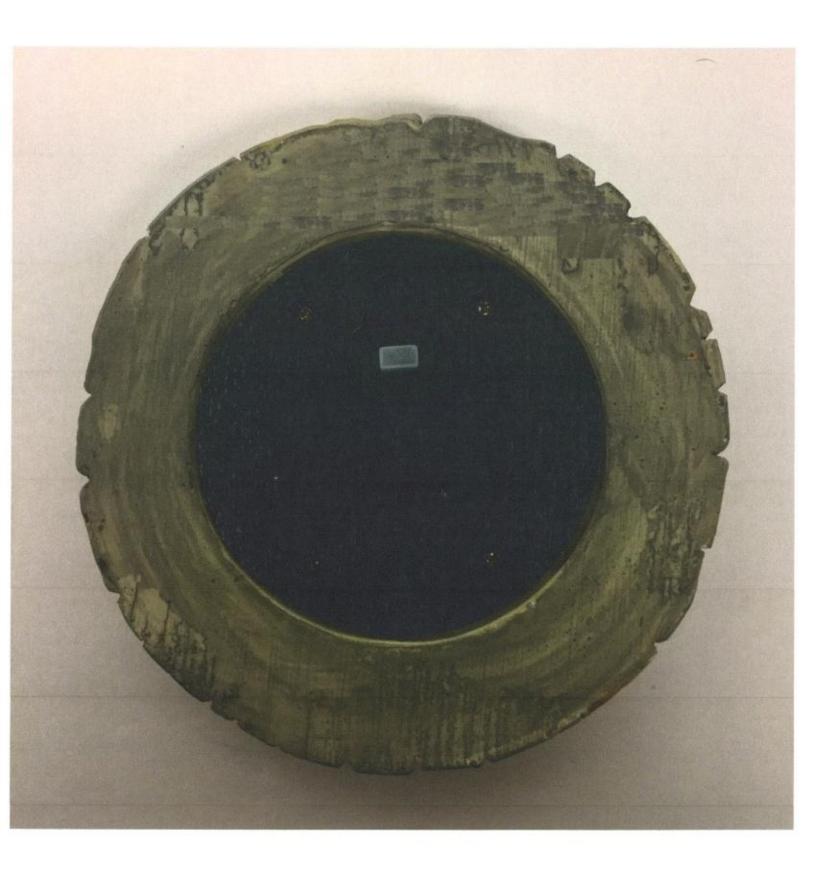
Case	8:22-cv-00984-DOC-DFM	Document 1 Filed 05/13/22 Page 15 of 52 Page ID #:15							
1	1 DEMAND FOR JURY TRIAL								
2	Plaintiff E. Misha & Sons, Inc. hereby demands a trial by jury on all issues so								
3	triable.								
4	F II								
5	May 12, 2022	Respectfully submitted,							
6	1111 12, 2022	/s/ John K. Rubiner							
7		John K. Rubiner - State Bar No. 155208							
8		<i>jrubiner@fmglaw.com</i> FREEMAN, MATHIS & GARY, LLP 550 South Hope St., Suite 2200							
9		550 South Hope St., Suite 2200 Los Angeles, CA 90071-2631							
10		Los Angeles, CA 90071-2631 Telephone: 213-615-7000 Facsimile: 213-615-7100							
11		John Zaccaria (pro hac vice to be filed)							
12		jzaccaria@notaromichalos.com Alan Federbush (pro hac vice to be filed)							
13		Alan Federbush (pro hac vice to be filed) alan.federbush@notaromichalos.com NOTARO MICHALOS & ZACCARIA P.C.							
14	4 I IOU Dutch Hill Road. Suite 240								
15		Orangeburg, NY 10962 Telephone: (845) 359-7700 Facsimile: (845) 359-7798							
16 17		Attorneys for Plaintiff							
17		E. MISHĂN & SONŚ, INC.							
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		- 15 -							
	COMPLAINT FOR PATENT AND COPYRIGHT INFRINGEMENT								

# EXHIBIT A



Case 8:22-cv-00984-DOC-DFM Document 1 Filed 05/13/22 Page 18 of 52 Page ID #:18







# **EXHIBIT B**

Case 8:22-cv-00984-DOC-DFM Document 1 #:22 Certificate of Registration Filed 05/13/22 Page 22 of 52 Page ID



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Acting United States Register of Copyrights and Director

Registration Number VAu 1-328-679

**Effective Date of Registration:** August 30, 2018

Completion/Publication Year of Completion: 2018	
Year of Completion: 2018	
Author	
• Author: Fred Hollinger	
Author Created: sculpture Work made for hire: No	
Citizen of: United States	
Copyright Claimant	
Copyright Claimant: E. Mishan & Son	
Transfer statement: By written agreer	, Suite 800, New York, NY, 10001, United States nent
Limitation of copyright claim	
Material excluded from this claim: Lighting compon-	ent
New material included in claim: sculpture	
Rights and Permissions	
Organization Name: E. Mishan & Son	s, Inc.
Name: John Zaccaria Email: jzaccaria@notaro	michalos com
<b>Telephone:</b> (845)359-7700	inicialos.com
Alt. Telephone: (212)278-8600	
Address: 100 Dutch Hill Re	bad. Suite 240

### Certification

 John Zaccaria August 30, 2018 J137-3744

Copyright Office notes: Basis for Registration: Sculptural features identified separately from and capable of existing independently of the utilitarian aspects of a useful article.

# **EXHIBIT C**

Case 8:22-cv-00984-DOC-DFM



US00D842521S

## (12) United States Design Patent (10) Patent No.:

#### Hollinger

#### (54) PAVER STONE DISK LIGHT

- (71) Applicant: E. MISHAN & SONS, INC., New York, NY (US)
- (72) Inventor: **Fred Hollinger**, Monroe Township, NJ (US)
- (73) Assignee: E. Mishan & Sons, Inc., New York, NY (US)
- (\*\*) Term: 15 Years
- (21) Appl. No.: 29/657,145
- (22) Filed: Jul. 19, 2018
- (51) LOC (11) Cl. ..... 26-05
- (52) U.S. Cl.
- USPC ...... **D26/67**; D25/113 (58) Field of Classification Search
- USPC ..... D26/67, 68, 73, 125; D25/113 CPC .... F21S 8/022; F21S 8/03; F21S 8/032; F21S 9/03; F21S 9/037; F21V 21/03; F21W 2111/02; F21W 2111/023; F21W 2111/027; F21W 2111/06; F21W 2131/103; F21W 2131/109; E01C 17/00 See application file for complete search history.

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		47/33
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		362/153.1

#### ent No.: US D842,521 S

#### (45) Date of Patent: **\*\*** Mar. 5, 2019

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Tutu Tech Faux-Rock Solar In-Ground LED Light, ASIN: B07F818544. Date first available at amazon.com Jul. 4, 2018. (Year: 2018).\* (Continued)

(Commueu)

Primary Examiner — Clare E Heflin (74) Attorney, Agent, or Firm — Notaro, Michalos & Zaccaria P.C.

#### (57) **CLAIM**

The ornamental design for a paver stone disk light, as shown and described.

#### DESCRIPTION

FIG. 1 is a top, front perspective view of a paver stone disk light showing my design therefor;

FIG. 2 is a top plan view thereof;

FIG. **3** is a bottom plan view thereof;

FIG. 4 is a front elevational view thereof;

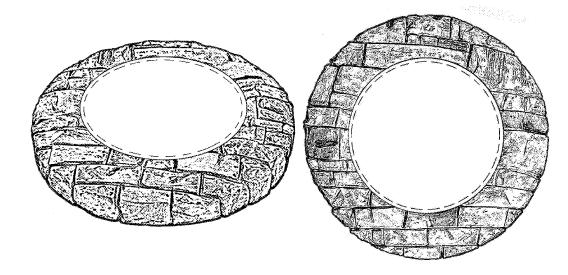
FIG. 5 is a rear elevational view thereof;

FIG. 6 is a right side elevational view thereof; and,

FIG. 7 is a left side elevational view thereof.

The dotted lines indicate a boundary beyond which no claim is made for the design.

#### 1 Claim, 5 Drawing Sheets



#### #:26

Page 2

#### (56) **References Cited**

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		,

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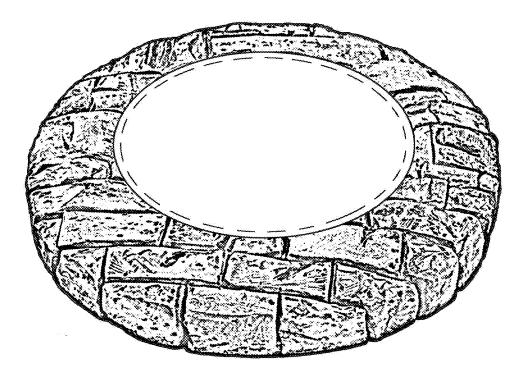
Cheerfullus Simulated Stone Decorative LED-powered Ground Light, ASIN: B07DPMTVVB. Found at amazon.com visited Dec. 12, 2018. (Year: 2018).\*

RoseSummer Waterproof Solar LED Simulated Stone Decorative Landscape Light, ASIN: B07GRYXDSL. Date first available at amazon.com Aug. 23, 2018. (Year: 2018).\*

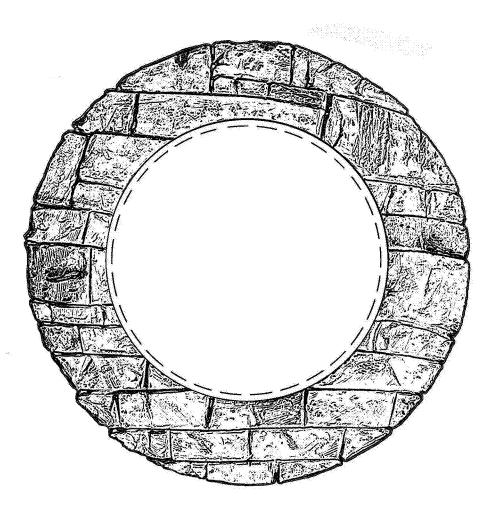
\* cited by examiner

**U.S. Patent** Mar. 5, 2019 Sheet 1 of 5

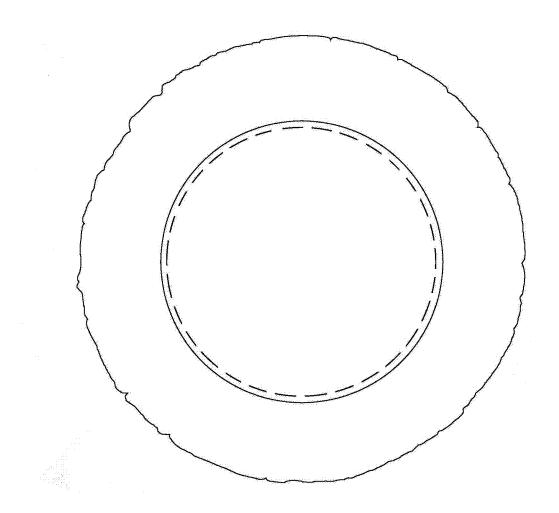
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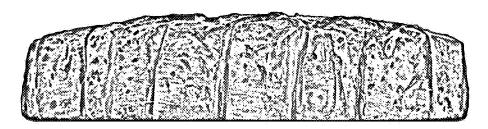
- U.S. Patent
- Mar. 5, 2019

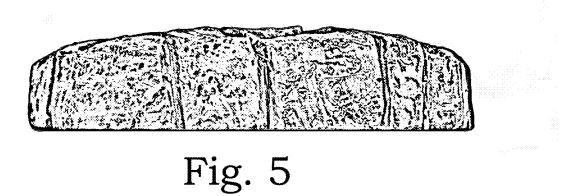


- U.S. Patent
  - Mar. 5, 2019

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US D842,521 S





- **U.S. Patent** Mar. 5, 2019

Sheet 5 of 5

US D842,521 S

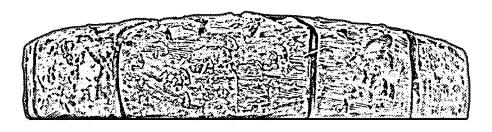


Fig. 6



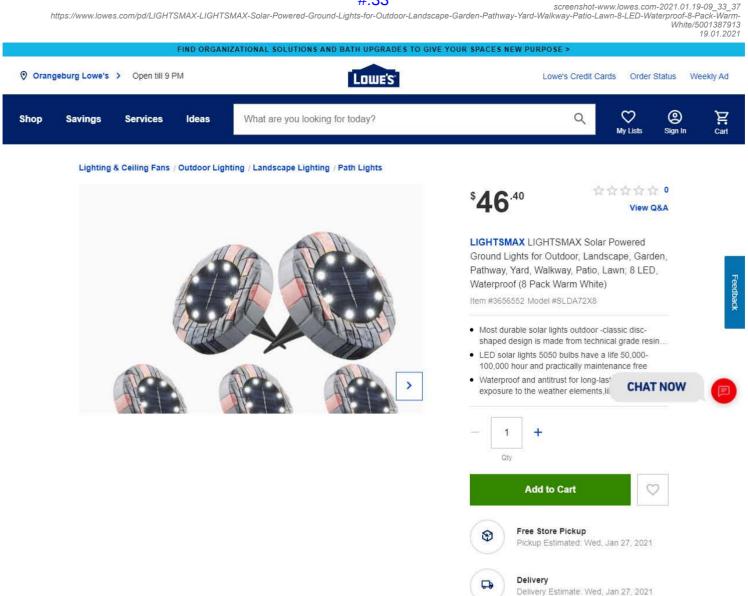
# **EXHIBIT D**

#### 1/19/2021 Case 8:22-cv-00984-DOC-DFM

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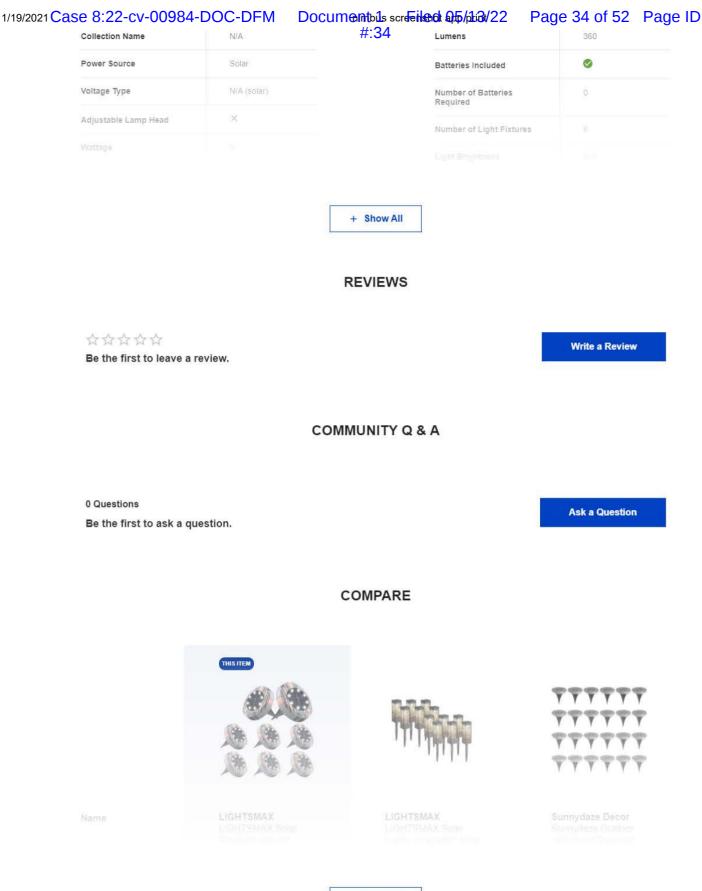
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#### **OVERVIEW**

- · Most durable solar lights outdoor -classic disc-shaped design is made from technical grade resin material with scratch and impact resistance, can withstand 2 tons of pressure
- · LED solar lights 5050 bulbs have a life 50,000-100,000 hour and practically maintenance free
- · Waterproof and antitrust for long-lasting use even if exposure to the weather elements, like snow, rain and frost
- . They're eco-friendly- photo voltaic cell absorb sunlight during the day to charge the batteries, an inner sensor automatically illuminates at dusk, can work 10-12h after 6-8 hours of full charging
- · Solar path lights can save electricity bill and easily to install requires no tools, save installation-related costs
- · Safe for lawn mower, can be used for driveway path lights and landscaping, can put it near any stair or uneven area to make home become a safer place, guide people at night which will help prevent injuries from falling or twisting an ankle
- · Solar led lights outdoor are ideal for illuminating walkways far from exterior outlets and can provide an enchanting glow along winding garden paths

#### SPECIFICATIONS



+ Show All

### CUSTOMERS ALSO VIEWED

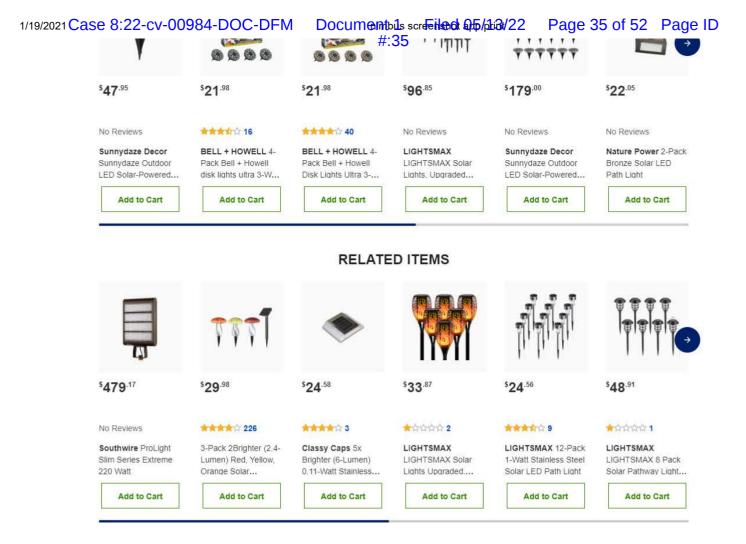












#### PREVIOUSLY VIEWED



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No Reviews

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#### **RELATED SEARCHES**

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ghts Integrated Path Lights



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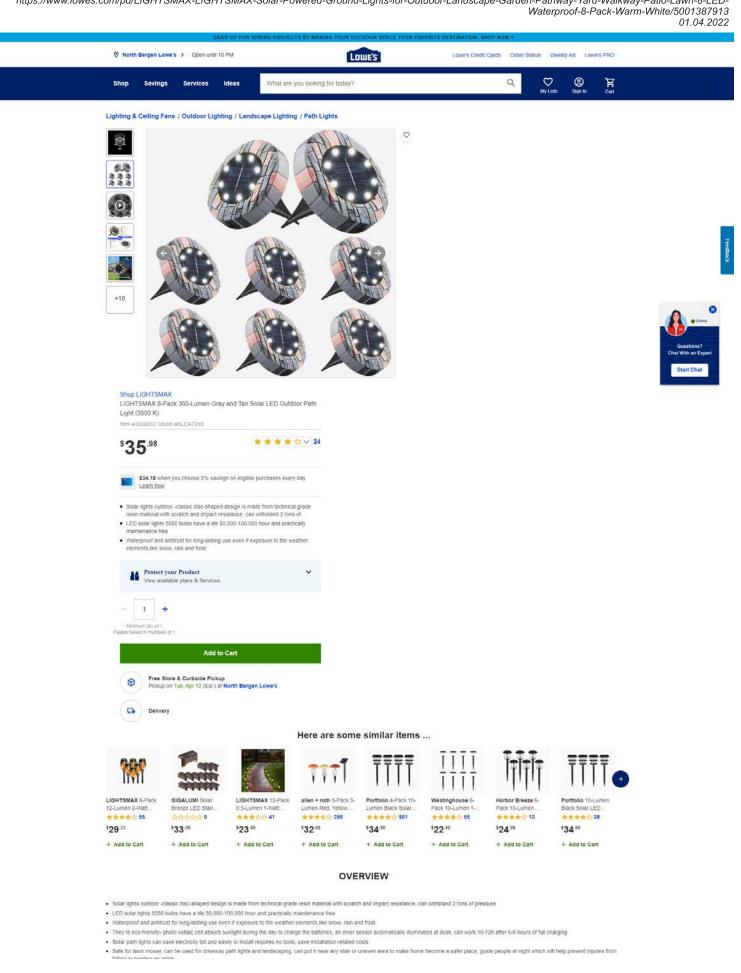
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screenshot-www.lowes.com-2022.04.01-10 49 07

https://www.lowes.com/pd/LIGHTSMAX-LIGHTSMAX-Solar-Powered-Ground-Lights-for-Outdoor-Landscape-Garden-Pathway-Yard-Walkway-Patio-Lawn-8-LED-



		SPECIFICATI	DNS	
ower Source	Solar		Battery Type	Mickel metal hydride (Mildel)
Color Temperature (Kel	Nins) 3500		Manufacturer Color/Finish	Goty and tan
Type	Pain Lign		Wattage	
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		COMPARE	E	
Name				TTT
Nallife	LIGHTSMAX 8-Pack 300-Lumen Gray and Tan Solar LED Ouldoor Path Light (3500 K)	BELL + HOWELL 8-Pack Bell and Howell Disk Lights 40-Lumen 3-Watt Silver/Stainless Stoel Soler Integrated LED Outdoor Path Light (6000 K)	GIGALUMI Solar Bronze LED Stair Light Warm White (16-Pack) 6-Lumen 2-Watt Brown Solar LED Outdoor Path Light (3000 K)	allen + roth 3-Pack 3- Lumen Red, Yellow, Orange Solar Integrated LED Outdoor Path Light Kit (3500 K)
	Add to Cart	Notity Me	Add to Cart	Add to Cart
Price	<sup>3</sup> 35 <sup>.90</sup>	<sup>5</sup> 39. <sup>99</sup>	<sup>3</sup> 33. <sup>50</sup>	<sup>5</sup> 32. <sup>98</sup>
Ratings	******	***************************************	*****	★★★☆☆ 305
Power Source	Solar	Solar	Solar	Solar
Bulb Type	LED	Integrated LED	LED	Integrated LED
/oltage Type	N/A (solar)	N/A (solar)	N/A (solar)	N/A (solar)
	360	40	6	3.0
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### REVIEWS

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A Star (* 11 A				
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#### COMMUNITY Q & A

2 Questions	Ask a Question
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### Case 8:22-cv-00984-DOC-DFM

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Document 1

#### PROTECTION PLANS

2-Year Lowe's Protection Plan for Safety And Security Lighting \$25-\$50 \$6.97

 If service is available, covers parts & labor for normal wear and tear. If service is not available, well pay you to reprace it. Payment satisfies plan: Starts after the manufacturors limited warranty ends. · Power Surge. If a power surge takes out your product, we'll take care of earls and labor. If available, or we'll pay you to reptace it. Payment satisfies plan

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\*\*\*\*\* LIGHTSMAX 8-Watt EQ Bright White LED Light Bulb

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\*\*\*\*\* 196 LIGHTSMAX 270-Degree 1000-Lumen Dual Detection Zone Black Solar LED Outdo.

\*\*\*\*\*\*\* LIGHTSMAX -Lumen Black Solar LED Spot Light

\*\*\*\*\*\* 17 LIGHTSMAX 20-ft (No Shade) Solar Outdoor LED Globe String Lights

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LIGHTSMAX 20-ft 30-Light (No Shade) Solar Multicolor Indoor/Outdoor LED Globe... Add to Cart

\$14.83

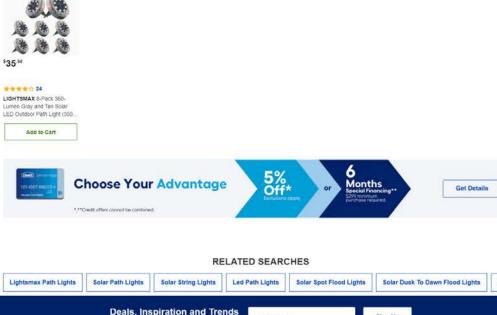
LIGHTSMAX 2-Pack 3.2-in Stainless Steel Solar Dark Sky Integrated Outdoor Wall Light Add to Cart

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PREVIOUSLY VIEWED

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Lightsmax Path Lights Le > Deals, Inspiration and Trends Email Address Sign Up We've got ideas to share. D . ( a ) 9= 0 . Installation Services Need Help? Order Status Lowe's Credit Cards Gift Cards Lowe's App ABOUT LOWE'S STORES & SERVICES CUSTOMER SERVICE CONNECT WITH US Who We Are Find a Store Contact Us f **9** P 0 

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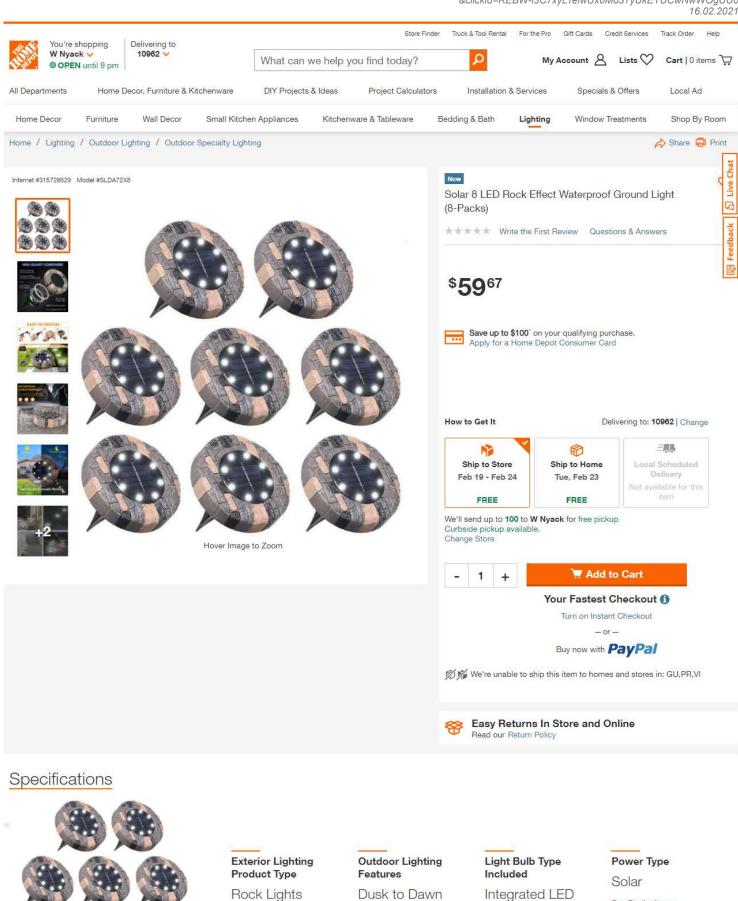
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#### 2/16/2021 Case 8:22-cv-00984-DOC-DFM Documentals screensed app/plia/22 Page 41 of 52 Page ID

#:41

screenshot-www.homedepot.com-2021.02.16-15\_01\_29

https://www.homedepot.com/p/Solar-8-LED-Rock-Effect-Waterproof-Ground-Light-8-Packs-SLDA72X8/315726629?irgwc=1&cm\_mmc=afl-ir-1220584-459920-&clickid=REBW-I3C7xyLTelwUx0Mo37yUkETUCwNwWOgUU0



Waterproof

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## 2/16/2021 Case 8:22-cv-00984-DOC-DFM



## Documentals screensed app/acid/22 Pa #:42

#### Dimensions

Product Depth (in.)	0.91 in
Product Height (in.)	6 in
Product Length (in.)	4.5 in
Product Width (in.)	4.5 in

#### Details

Actual Color Temperature (K)	6500
Color Rendering Index (CRI)	75
Color Temperature	Cool White
Exterior Lighting Product Type	Rock Lights
Fixture Color/Finish	plastic
Light Bulb Type Included	Integrated LED.
Lumens	80
Number of Bulbs	8
Outdoor Lighting Features	Dusk to Dawn,Waterproof
Pack Size	8
Power Type	Solar
Product Weight (lb.)	0.3 lb
Returnable	180-Day
Space Between Bulbs (in.)	<u>0</u>
Voltage (v)	1.2v
Watt Equivalence	0.5

#### Warranty / Certifications

Manufacturer Warranty	1 month

## **Product Overview**

LIGHTSMAX Solar 8LED Rock Effect creates a delightful environment for your garden, patio, pathway, driveway. Equipped with high quality solar panel, 8-hours direct auto sun charged will light up to 8-hours at night, dust to dawn. Water resistance, rust resistance are suitable for difficult weather such as rain, snow. No tool, no wiring required.

- Most durable solar lights outdoor -classic disc-shaped design is made from technical grade ABS material with scratch and impact resistance, can withstand 2 tons of pressure
- LED solar lights 5050 bulbs have a life 50,000-hour to 100,000-hour and practically maintenance free
- · Waterproof and antitrust for long-lasting use even if exposure to the weather elements, like snow, rain and frost
- Eco-friendly- photo voltaic cell absorb sunlight during the day to charge the batteries, an inner sensor automatically illuminates at dusk, can work 8-hours to 10-hours after 6-hours to 8-hours of full
- Solar path lights can save electricity bill and easily to install requires no tools, save installation-related costs
- Safe for lawn mower, can be used for driveway path lights and landscaping, can put it near any stair or uneven area to make home become a safer place, guide people at night which will help prevent injuries from falling or twisting an ankle
- Solar led lights outdoor are ideal for illuminating walkways far from exterior outlets and can provide an enchanting glow along winding garden paths
- Return Policy

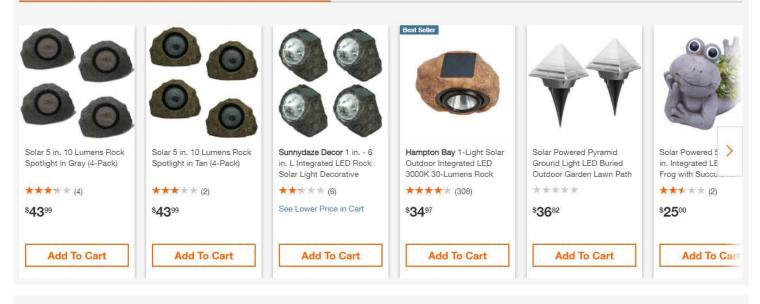
#### Info & Guides

- Warranty
- Return Policy

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## Customers Who Viewed This Also Viewed





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## **Questions & Answers**

### Ask the first question

Typical questions asked about products:

- Is the product durable?
- Is the product easy to use?
- What are the dimensions of the product?

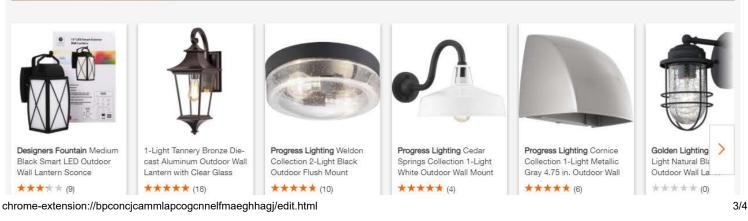
## Customer Reviews

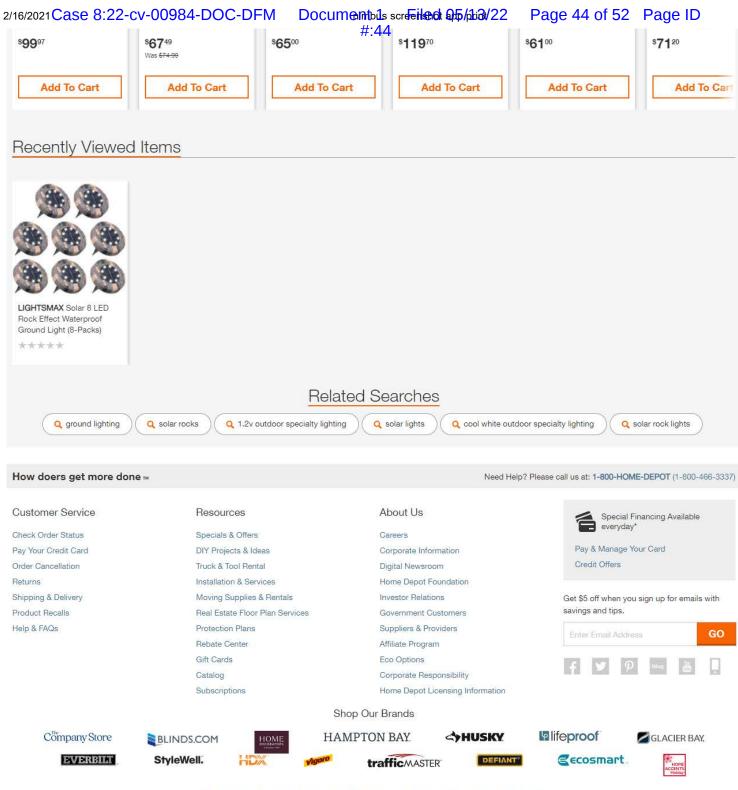
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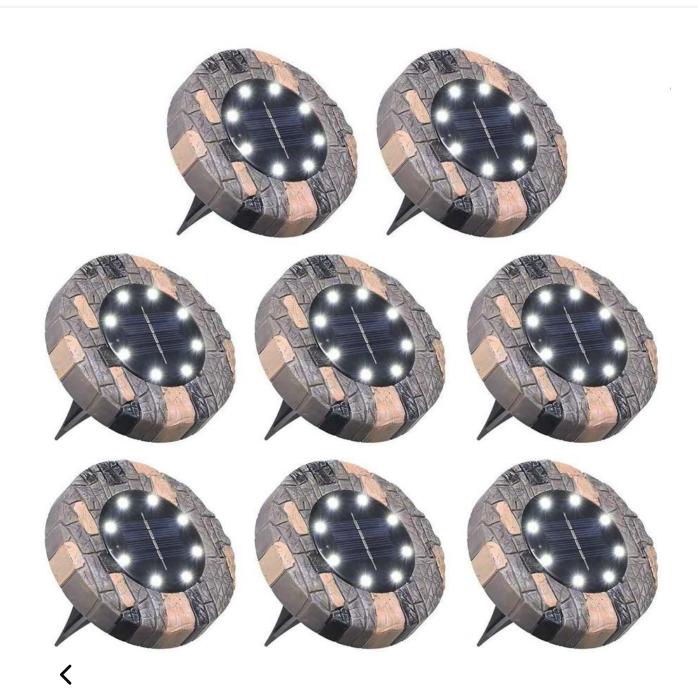
Pest Controls ~ Solar Lights ~

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About Us Q & A



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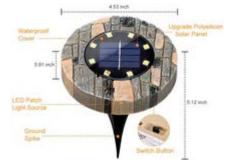




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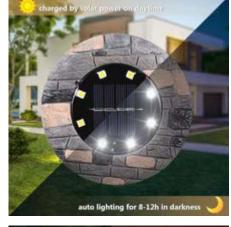
EASY TO INSTALL





4/18/22, 5 States 8:22-CV-00984-DO Oks RFdV Style Dictual Isten Graund Failed Walk way 2 Ght - Coage to Bage it 48 201 frank of the Bage ID

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>

# 8 pks Rock Style 8 LEDs Solar Ground Pathway Walkway Light -Cool White

<del>\$77.34</del> \$47.34 Sale

Quantity

1

ADD TO CART

**BUY IT NOW** 

4/18/22, 5. States 8:22-CV-00984-DO Oks Rod / Style Black Ison Craund Failed Walk 20 Chi - Coll grade 1 - Coll

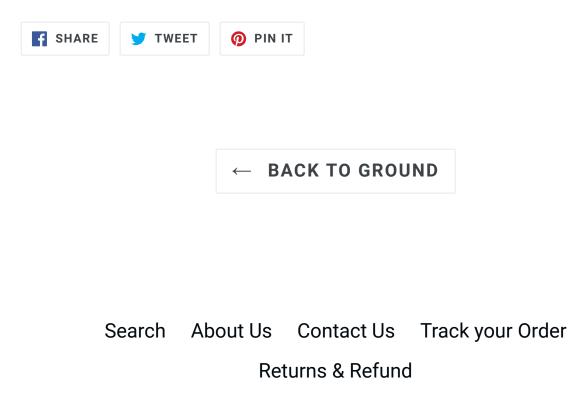
[Long Lasting] : 100mAh solar panel with built-in 600mAh large capacity NI-MH battery to ensure them work all night, don't require external power or any special maintenance.

【Unique Look】: Stone- like appearance makes these solar lights merge in the surrounding, helps blend with turf/grass, looks cool even at daytime.

【Weather resistance】: IP65 dust&water resistant with superb reliable PP material, can work even on bad weather to illuminate your garden.

【Easy to Install】: Just stick these outdoor lights to the ground and let the sun fill them up with energy, don't need wires or other connections.

[Widely Application] :Leave these disk lights out in the sun for a day, they give a beautiful ambiance and make your garden stand out at night!



4/18/22, 5. States 8:22-CV-00984-D@ Gks REdk/Style Brecks Issan Graund Fail and Walk 3/2 Ght - CRagge it 50 201 frag line age ID #:50 © 2022, P2 Trading Inc. Powered by Shopify



Pest Controls ~ Solar Lights ~ Home Goods ~ About Us Q & A



# About Us

## Who are we?

We are minority own small business with a heart to serve our community in the solar and pest control industry.

## Where can you find our products?

You may find us online at Walmart, Amazon, Home Depot, Lowes, Wayfair, Wish, Ebay, Kroger, 1-800 flower, NBCU, Giant Eagle and many more.

## Where are we located?

We are located in Artesia, California

## Where do you ship to?

We ship to all of North America which includes, US, Canada and Mexico.

## 4/18/22, 5@2000 8:22-cv-00984-DOC-DFM Document About Usilerd Of addig/22 Page 52 of 52 Page ID #:52 Search About Us Contact Us Track your Order

## **Returns & Refund**

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