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11
12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14

15 SOLO BRANDS, LLC, a Texas limited
16 liability company,

17 Plaintiff,

18 vs.

19 THE PARTNERSHIPS AND
20 UNINCORPORATED ASSOCIATIONS
21 IDENTIFIED ON SCHEDULE "A"

22 Defendants.
23

Case No. 2:22-cv-7407

COMPLAINT

DEMAND FOR JURY TRIAL

24 Complaint Filed: None Set

25 Trial Date: None Set
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1 **COMPLAINT**

2 Plaintiff Solo Brands, LLC (fka Frontline Advance, LLC) dba Solo Stove
3 (hereinafter referred to as “Solo Stove”) brings this complaint against the Partnerships
4 and Unincorporated Associations identified on Schedule A attached hereto (collectively,
5 “Defendants”) due to Defendants’ blatant unlawful selling of knockoff products, and
6 attempts to hide their identity while doing so. Plaintiff alleges as follows:
7

8 **THE PARTIES**

9 1. Plaintiff Solo Brands, LLC is a limited liability company organized under
10 the laws of Texas, with a principal place of business in Grapevine, Texas.

11 2. Founded in 2011, Solo Stove has become a world-famous manufacturer of
12 smokeless fire pits, grills, portable camp stoves and accessories, as well as a variety of
13 other products.

14 3. Defendants are individuals and business entities of unknown makeup who
15 own and/or operate one or more of the e-commerce stores under at least the Seller
16 Aliases and via the Domain Names identified on Schedule A and/or other seller aliases
17 not yet known to Solo Stove (the “Seller Aliases”). On information and belief,
18 Defendants reside and/or operate in the People’s Republic of China or other foreign
19 jurisdictions with lax intellectual property enforcement systems, or redistribute products
20 from the same or similar sources in those locations. Defendants have the capacity to be
21 sued pursuant to Federal Rule of Civil Procedure 17(b).

22 4. Tactics used by Defendants to conceal their identities and the full scope of
23 their operation make it virtually impossible for Solo Stove to learn Defendants’
24 identities and the exact interworking of their network. If Defendants provide additional
25 credible information regarding their identities, Solo Stove will take appropriate steps to
26 amend the Complaint.
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1 **JURISDICTION AND VENUE**

2 5. This case involves claims arising under the patent laws of the United
3 States. As such, this Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and
4 1338(a).

5 6. This case also involves claims arising under the Trademark Act of 1946,
6 15 U.S.C. § 1051, *et seq.* (“the Lanham Act”) and federal common law. As such, this
7 Court has subject matter jurisdiction under 28 U.S.C. § 1367(a).

8 7. Venue is proper in this District under 28 U.S.C. §§ 1391, and this Court
9 may properly exercise personal jurisdiction over Defendants since each of the
10 Defendants directly targets business activities toward consumers in the United States,
11 including California, through at least the fully interactive e-commerce stores operating
12 under the Seller Aliases identified in Schedule A attached hereto. Specifically,
13 Defendants have targeted sales to California residents by setting up and operating e-
14 commerce stores that target United States consumers using one or more Seller Aliases,
15 offer shipping to the United States, including California, accept payment in U.S. Dollars
16 and, on information and belief, have sold products using infringing versions of Solo
17 Stove’s patented fire pits to residents of California. Each of the Defendants is
18 committing tortious acts in California, is engaging in interstate commerce, and has
19 wrongfully caused Solo Stove substantial injury in the State of California. In addition,
20 Defendants have or utilize a regular and established place of business in this District,
21 including 15060 Shoemaker Ave., Santa Fe Springs, CA 90670, and have committed
22 acts of infringement in this District.

23
24 **BACKGROUND**

25 8. This action has been filed by Solo Stove to combat e-commerce store
26 operators who trade upon Solo Stove’s intellectual property by offering for sale and/or
27 selling unauthorized and unlicensed products, including fire pits and related accessories.
28 Defendants create e-commerce stores operating under one or more Seller Aliases that

1 are advertising, offering for sale and selling fire pits and related accessories that infringe
2 upon Solo Stove’s patents and trade dress. Defendants attempt to avoid and mitigate
3 liability by operating under one or more Seller Aliases to conceal both their identities
4 and the full scope and interworking of their operation. Solo Stove is forced to file this
5 action to combat Defendants’ infringement of its intellectual property, as well as to
6 protect unknowing consumers from purchasing knock-off products over the Internet.
7 Solo Stove has been and continues to be irreparably damaged through infringement of
8 its valuable intellectual property as a result of Defendants’ actions and seeks injunctive
9 and monetary relief.

10 9. Solo Stove creates and sells innovative outdoor products including its 15”
11 Ranger fire pit, 19.5” Bonfire fire pit, and 27” Yukon fire pit (collectively, “Solo Stove
12 Fire Pits”), which it sells through its online retail store at solostove.com and a network
13 of retailers.

14 10. As a result of its commitment to innovation, Solo Stove has been granted
15 several U.S. Patents that protect its inventions, including patents related to its
16 innovative fire pits.

17 11. Solo Stove owns U.S. Patent Number D923,163 (the “D’163 Patent”), for
18 the ornamental design of a smokeless fire pit. A copy of the ‘163 Patent is attached
19 hereto as **Exhibit 1**.

20 12. Solo Stove also owns U.S. Patent Number D914,858S (the “D’858
21 Patent”), for the ornamental design of a bonfire pit stand. A copy of the ‘858 Patent is
22 attached hereto as **Exhibit 2**.

23 13. Solo Stove also owns trade dress rights in several of its products, including
24 its fire pits. Solo Stove has sold hundreds of thousands of the Solo Stove Fire Pits
25 throughout the United States. Solo Stove has invested significant resources in the
26 design, development, manufacture, advertising, and marketing of the Solo Stove Fire
27 Pits. The designs and features of the Solo Stove Fire Pits have received widespread and
28 unsolicited public attention and are widely recognized by the general public throughout

1 the United States. For example, the Solo Stove Fire Pits have been featured in numerous
2 news, magazine, television, social media, and other online articles and reviews such as
3 USA Today, Rolling Stone, Forbes.com, CNN.com, CNET, Popular Mechanics, and
4 many more.

5 14. While primarily sold online, the Solo Stove Fire Pits are also sold in
6 popular retail stores including Dicks Sporting Goods, REI, Ace Hardware, Academy
7 Sports and dozens of smaller retail stores across the country.

8 15. The designs of the Solo Stove Fire Pits have distinctive and non-functional
9 features that identify to consumers that the Solo Stove Fire Pits originate with Solo
10 Stove. As a result of Solo Stove's continuous and exclusive use of the Solo Stove Fire
11 Pits, Solo Stove's marketing, advertising, and sales of the Solo Stove Fire Pits, and the
12 highly valuable goodwill and substantial secondary meaning acquired as a result, Solo
13 Stove owns trade dress rights in the designs and appearances of the Solo Stove Fire Pits,
14 which consumers have come to uniquely associate with Solo.

15 16. Example images of the Solo Stove Fire Pits are shown below:



17 17. Solo Stove has trade-dress rights in the overall look, design, and
18 appearance of the Solo Stove Fire Pits, which includes a cylindrical design; the design,
19 appearance and placement of the exterior holes positioned equidistantly around the
20 base; the design and appearance of the upper rim, including a removable flame ring that
21 tapers down conically toward the exterior walls; the design, appearance, and placement
22 of the logo embossed onto the lower half of the front exterior wall; the color silver; the
23 design and appearance of the curves, profile, exterior walls, and interior walls; the
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1 design, appearance, and placement of the holes of the interior walls placed equidistantly
2 below the rim; the design, appearance, and placement of the grate; and the relationship
3 of these features to each other and to other features.

4 18. As a result of Solo Stove's exclusive, continuous, and substantial use,
5 advertising, and sales of the Solo Stove Fire Pits bearing Solo Stove's trade dress, and
6 the publicity and attention that has been paid to Solo Stove's trade dress, Solo Stove has
7 become famous and acquired valuable goodwill and substantial secondary meaning in
8 the marketplace as consumers have come to uniquely associate Solo Stove's trade dress
9 as a source identifier of Solo Stove.

10 19. Solo Stove has continuously sold its products under the SOLO STOVE
11 word mark and other trademarks (collectively, the "SOLO STOVE Trademarks") for
12 many years, including on the Solo Stove Fire Pits. As a result of this long-standing use,
13 strong common law trademark rights have amassed in the SOLO STOVE Trademarks.
14 Solo Stove's use of the marks has also built substantial goodwill in and to the SOLO
15 STOVE Trademarks. The SOLO STOVE Trademarks are famous marks and valuable
16 assets of Solo Stove. Solo Stove products typically include at least one of the registered
17 SOLO STOVE Trademarks.

18 20. The below U.S. registrations for the SOLO STOVE Trademarks are valid,
19 subsisting, in full force and effect, and one is incontestable pursuant to 15 U.S.C. §
20 1065. The registrations for the SOLO STOVE Trademarks constitute *prima facie*
21 evidence of their validity and of Solo Stove's exclusive right to use the SOLO STOVE
22 Trademarks pursuant to 15 U.S.C. § 1057(b). True and correct copies of the United
23 States Registration Certificates for the above-listed SOLO STOVE Trademarks are
24 attached hereto as **Exhibit 3**.

25 21. The SOLO STOVE Trademarks are distinctive when applied to the Solo
26 Stove products, signifying to the purchaser that the products come from Solo Stove and
27 are manufactured to Solo Stove's quality standards. Whether Solo Stove manufactures
28 the products itself or contracts with others to do so, Solo Stove has ensured that

1 products bearing the SOLO STOVE Trademarks are manufactured to the highest
2 quality standards.

3 22. The SOLO STOVE Trademarks are famous marks, as that term is used in
4 15 U.S.C. § 1125(c)(1), and have been continuously used and never abandoned. The
5 innovative marketing and product designs of the Solo Stove products have enabled the
6 Solo Stove brand to achieve widespread recognition and fame and have made the SOLO
7 STOVE Trademarks well-known marks. The widespread fame, outstanding reputation,
8 and significant goodwill associated with the Solo Stove brand have made the SOLO
9 STOVE Trademarks valuable assets of Solo Stove.

10 23. Solo Stove products have become enormously popular, driven by the
11 brand's arduous quality standards and innovative design. Among the purchasing public,
12 genuine Solo Stove products are instantly recognizable as such. In the United States and
13 around the world, the Solo Stove brand has come to symbolize high quality.

14 24. As a result of Solo Stove's significant promotional efforts, commercial
15 success, and popularity, Solo Stove is the leader in the portable fire pit market. The
16 goodwill associated with the SOLO STOVE brand and the SOLO STOVE Trademarks
17 is of incalculable and inestimable value to Solo Stove.


18 25. Several of the SOLO STOVE Trademarks are registered with the United
19 States Patent and Trademark Office, a list of which is included below.

REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
6,250,965	SOLO STOVE	January 19, 2021	For: Cooking stoves; portable fire pits; portable stoves; Charcoal grills; Barbecues and grills; fitted covers for cooking stoves; fitted covers for portable fire pits; fitted covers for portable stoves; cooking stove stands; portable fire pit

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			<p>stands; portable stove stands; cooking stove windscreens, namely, screens specially adapted for cooking stoves for shielding against wind; portable fire pit windscreens, namely, screens specially adapted for cooking stoves for shielding against wind; portable stove windscreens, namely, screens specially adapted for cooking stoves for shielding against wind; alcohol burners in class 11.</p> <p>For: Cookware, namely, portable non-disposable stainless steel pots and pans for outdoor use; portable non-disposable stainless steel cups for outdoor use; portable non-disposable stainless steel drinkware for outdoor use; portable non-disposable stainless steel plates for outdoor use; Portable non-disposable stainless steel pots and pans for camping; portable non-disposable stainless steel bowls for outdoor use; cooking stove burner covers in class 21.</p>
4,750,307	SOLO STOVE	June 9, 2015	<p>For: Portable stoves; Solid fuel burning stoves; Wood burning cooking stoves; Wood burning stoves in class 11.</p>

5,511,476		July 10, 2018	<p>For: Cooking stoves; Portable fire pits; Portable stoves in class 11.</p> <p>For: Cookware, namely, portable non-disposable stainless steel pots and pans for outdoor use; portable non-disposable stainless steel cups for outdoor use; portable nondisposable stainless steel drinkware for outdoor use; portable non-disposable stainless steel plates for outdoor use; Portable non disposable stainless steel pots and pans for camping; portable non-disposable stainless steel bowls for outdoor use in class 21.</p>
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DEFENDANTS' UNLAWFUL ACTIVITIES

26. Defendants operate e-commerce stores under one or more Seller Aliases that advertise, promote, offer for sale, sell, import and/or distribute a virtually identical imitation of the Solo Stove Fire Pits called “the Bonstove Fire Pit.” For example, the Bonstove Fire Pit is listed for sale on the websites www.bonslife.com and www.offroadrock.com, copies of which are attached as **Exhibit 4**, and previously on www.bonstove.com until the cite was removed by the registrar.

27. Defendants have purposefully advertised, promoted, offered for sale, sold, imported, and/or distributed products that violate Solo Stove’s rights, including the rights protected by Solo Stove’s intellectual property. On information and belief, Defendants are working in concert to knowingly and willfully manufacture, import,

1 distribute, offer to sale, and sell knock-off products, including the Bonstove Fire Pit.
2 Defendants' actions have not been authorized by Solo Stove.

3 28. An example image of the Bonstove Fire Pit is shown below. The Bonstove
4 Fire Pit is a virtually identical copy of the Solo Stove Fire Pits.



14 29. Defendants' e-commerce stores also imitate Solo Stove by using many of
15 Solo Stove's images, product descriptions, verbatim wording to describe the company's
16 mission, and has posted customer reviews of Solo Stove's products suggesting the
17 products are the same.

18 30. As a result of Defendants' activities related to the infringing products,
19 there is a likelihood of confusion between Defendants and their products on the one
20 hand, and Solo Stove and its products on the other hand.

21 31. Defendants' use of Solo Stove's intellectual property rights, including its
22 trade dress rights and its patent rights, has been intentional, willful and malicious.
23 Defendants' bad faith is evidenced at least by Defendants' direct and explicit copying of
24 the Solo Stove Fire Pits, images, and third-party product reviews.

COUNT 1 – INFRINGEMENT OF THE D’163 PATENT

32. Solo Stove realleges and incorporates by reference the paragraphs above.

33. The U.S. Patent Office duly and legally issued the D’163 Patent on June 22, 2021.

34. The Bonstove Fire Pit infringes claim 1 of the D’163 Patent.

35. Defendants directly infringed and continue to directly infringe the D’163 Patent under 35 U.S.C. § 271 (a) by using, selling, offering for sale, importing and/or distributing the Bonstove Fire Pit.

36. On information and belief, Defendants were aware of the D’163 Patent. Nevertheless, Defendants continued to use, sell, offer for sale, import and/or distribute the Bonstove Fire Pit. As such, Defendants’ infringement is knowing and willful.

37. Defendants infringing conduct has caused Solo Stove to suffer substantial damages, including lost profits, lost sales, and/or lost royalties. In light of Defendants’ ongoing infringement, Solo Stove’s damages are continuing.

38. Solo Stove has suffered and will continue to suffer, permanent and irreparable injury because of Defendants’ infringement, for which Solo Stove has no adequate remedy at law. As such, Solo Stove is entitled to equitable relief, including but not limited to an injunction restraining Defendants’ infringing conduct.

COUNT 2 – INFRINGEMENT OF THE D’858 PATENT

39. Solo Stove realleges and incorporates by reference the paragraphs above.

40. The U.S. Patent Office duly and legally issued the D’858 Patent on March 30, 2021.

41. The Bonstove Fire Pit infringes claim 1 of the D’858 Patent.

42. Defendants directly infringed and continue to directly infringe the D’858 Patent under 35 U.S.C. § 271 (a) by using, selling, offering for sale, importing and/or distributing the Bonstove Fire Pit.

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1 43. On information and belief, Defendants were aware of the D’858 Patent.
2 Nevertheless, Defendants continued to use, sell, offer for sale, import and/or distribute
3 the Bonstove Fire Pit. As such, Defendants’ infringement is knowing and willful.

4 44. Defendants infringing conduct has caused Solo Stove to suffer substantial
5 damages, including lost profits, lost sales, and/or lost royalties. In light of Defendants’
6 ongoing infringement, Solo Stove’s damages are continuing.

7 45. Solo Stove has suffered and will continue to suffer, permanent and
8 irreparable injury because of Defendants’ infringement, for which Solo Stove has no
9 adequate remedy at law. As such, Solo Stove is entitled to equitable relief, including but
10 not limited to an injunction restraining Defendants’ infringing conduct.

11
12 **COUNT 3 – INFRINGEMENT OF SOLO STOVE’S TRADE DRESS**

13 46. Solo Stove realleges and incorporates by reference the paragraphs above.

14 47. Defendants’ advertisements, promotions, offers to sell, sales, import and/or
15 distribution of the Bonstove Fire Pit violate §43(a) of the Lanham Act, 15 U.S.C. §
16 1125(a), by infringing Solo Stove’s trade dress. Defendants’ use of Solo’s trade dress
17 and/or colorable imitations thereof is likely to cause confusion, mistake, or deception as
18 to the affiliation, connection, and/or association of Defendants with Solo Stove as to the
19 origin, sponsorship, and/or approval of the Bonstove Fire Pits, at least by creating the
20 false and misleading impression that the Bonstove Fire Pits are manufactured by,
21 authorized by, or otherwise associated with Solo Stove.

22 48. Solo Stove’s trade dress is entitled to protection under the Lanham Act.
23 Solo Stove’s trade dress includes unique, distinctive, and non-functional designs. Solo
24 Stove has extensively and continuously promoted and used its trade dress in the United
25 States. Through that extensive and continuous use, Solo Stove’s trade dress has become
26 a well-known indicator of the origin and quality of Solo Stove’s products. Solo Stove’s
27 trade dress has also acquired substantial secondary meaning in the marketplace.
28 Moreover, Solo Stove’s trade dress acquired this secondary meaning before Defendants

1 commenced their unlawful use of Solo Stove’s trade dress in connection with the
2 Bonstove Fire Pits.

3 49. Defendants’ use of Solo Stove’s trade dress and/or colorable imitations
4 thereof has caused and, unless enjoined, will continue to cause substantial and
5 irreparable injury to Solo Stove for which Solo Stove has no adequate remedy at law,
6 including at least substantial and irreparable injury to the goodwill and reputation for
7 quality associated with Solo Stove’s trade dress, Solo Stove’s products, and Solo Stove.

8 50. On information and belief, Defendants’ use of Solo Stove’s trade dress
9 and/or colorable imitations thereof has been intentional, willful, and malicious.
10 Defendants’ bad faith is evidence at least by similarity of the infringing products to Solo
11 Stove’s trade dress and by Defendants’ continuing disregard for Solo Stove’s rights.

12 51. Solo Stove is entitled to injunctive relief, and Solo Stove is entitled to
13 recovery of at least Defendants’ profits, Solo Stove’s actual damages, enhanced
14 damages, costs, and reasonable attorney fees under at least 15 U.S.C. §§ 1125(a), 1116,
15 and 1117.

16
17 **COUNT 4 – TRADEMARK INFRINGEMENT (15 U.S.C. § 1114)**

18 52. Solo Stove hereby re-alleges and incorporates by reference the allegations
19 set forth in the preceding paragraphs.

20 53. The SOLO STOVE Trademarks are highly distinctive marks. Consumers
21 have come to expect the highest quality from Solo Stove products offered, sold or
22 marketed under the SOLO STOVE Trademarks.

23 54. Defendants have sold, offered to sell, marketed, distributed, and advertised,
24 and are still selling, offering to sell, marketing, distributing, and advertising products
25 using confusingly similar versions of the SOLO STOVE Trademarks without Solo
26 Stove’s permission.

27 55. Solo Stove is the exclusive owner of the SOLO STOVE Trademarks. Solo
28 Stove’s United States Registrations for the SOLO STOVE Trademarks (Exhibit 4) are

1 in full force and effect. On information and belief, Defendants have knowledge of Solo
2 Stove's rights in the SOLO STOVE Trademarks, and are willfully infringing and
3 intentionally infringing upon the SOLO STOVE Trademarks. Defendants' willful,
4 intentional and unauthorized use of the SOLO STOVE Trademarks is likely to cause
5 and is causing confusion, mistake, and deception as to the origin and quality of the
6 products among the general public.

7 56. Defendants' activities constitute willful trademark infringement under
8 Section 32 of the Lanham Act, 15 U.S.C. § 1114.

9 57. Solo Stove has no adequate remedy at law, and if Defendants' actions are
10 not enjoined, Solo Stove will continue to suffer irreparable harm to its reputation and
11 the goodwill of the SOLO STOVE Trademarks.

12 58. The injuries and damages sustained by Solo Stove have been directly and
13 proximately caused by Defendants' wrongful reproduction, use, advertisement,
14 promotion, offering to sell, and sale of imitation products infringing upon Solo Stove's
15 trademarks.

16
17 **COUNT 5 – FALSE DESIGNATION OF ORIGIN (15 U.S.C. 1125(a))**

18 59. Solo Stove hereby re-alleges and incorporates by reference the allegations
19 set forth in the preceding paragraphs.

20 60. Defendants' promotion, marketing, offering for sale, and sale of infringing
21 products and trademarks has created and is creating a likelihood of confusion, mistake,
22 and deception among the general public as to the affiliation, connection, or association
23 with Solo Stove or the origin, sponsorship, or approval of Defendants' infringing
24 products by Solo Stove.

25 61. By using confusingly similar versions of the SOLO STOVE Trademarks
26 on infringing products, Defendants create a false designation of origin and a misleading
27 representation of fact as to the origin and sponsorship of the imitation products.
28

1 62. Defendants’ false designation of origin and misrepresentation of fact as to
2 the origin and/or sponsorship of the imitation products to the general public involves the
3 use of counterfeit marks and is a willful violation of Section 43 of the Lanham Act, 15
4 U.S.C. § 1125.

5 63. Solo Stove has no adequate remedy at law and, if Defendants’ actions are
6 not enjoined, Solo Stove will continue to suffer irreparable harm to its reputation and
7 the goodwill of the Solo Stove brand.

8
9 **PRAYER FOR RELIEF**

10 Wherefore, Solo Stove prays for judgment as follows:

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

15 a. actions in violation of Solo Stove’s patent rights, on such terms as
16 the court deems reasonable, as provided by 35 U.S.C. § 283;

17 b. actions in violations of Solo Stove’s trade dress and/or the SOLO
18 STOVE Trademarks or any reproductions, infringing copies or colorable imitations
19 thereof in any manner in connection with the distribution, marketing, advertising,
20 offering for sale, or sale of any product, including the Bonstove Fire Pit, that is not a
21 genuine Solo Stove product or is not authorized by Solo Stove to be sold in connections
22 with Solo Stove’s trade dress and/or the SOLO STOVE Trademarks;

23 c. committing any acts calculated to cause consumers to believe that
24 Defendants’ infringing products, including the Bonstove Fire Pits, are those sold under
25 the authorization, control, or supervision of Solo Stove, or are sponsored by, approved
26 by, or otherwise connected with Solo Stove;

27 d. further infringing the Solo Stove’s trade dress and/or the Solo Stove
28 Trademarks and damaging Solo Stove’s goodwill;

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1 e. manufacturing, shipping, delivering, holding for sale, transferring or
2 otherwise moving, storing, distributing, returning, or otherwise disposing of, in any
3 manner, products or inventory not manufactured by or for Solo Stove, nor authorized
4 by Solo Stove to be sold or offered for sale, and which bear any of Solo Stove’s trade
5 dress or trademarks, including the SOLO STOVE Trademarks, or any reproductions,
6 infringing copies, or colorable imitations thereof;

7 2. Entry of an Order that, upon Solo Stove’s request, those with notice of the
8 injunction, including, without limitation, any online marketplace such as eBay,
9 AliExpress, Alibaba, Amazon, Wish.com, and Dhgate (collectively, the “Third Party
10 Providers”) shall disable and cease displaying any advertisements used by or associated
11 with Defendants in connection with the sale of infringing goods using Solo Stove’s
12 intellectual property and any domain name registrar, including but not limited to,
13 GoDaddy Operating Company, LLC (“GoDaddy”), Name.com, PDR LTD. d/b/a/
14 PublicDomainRegistry.com (“PDR”), and Namecheap Inc. (“Namecheap”) shall
15 disable the domain names and make them inactive and untransferable;

16 3. That the Court bar importation of the Bonstove Fire Pits and/or colorable
17 imitations thereof into the United States under at least 15 U.S.C. §1125(b);

18 4. That the Court award damages adequate to compensate Solo Stove for
19 Defendants’ infringement of Solo Stove’s patents in an amount to be proved at trial, up
20 to three times the amount found or assessed, but in no event less than a reasonable
21 royalty for the use made of the invention by Defendants, together with interest and
22 costs as fixed by the court, as provided by 35 U.S.C. § 284;

23 5. That the Court order Defendants to disgorge their total profits from the
24 infringement, as provided by 35 U.S.C. § 289;

25 6. That the Court award damages adequate to compensate Solo Stove for
26 Defendants’ infringement of Solo Stove’s trade dress and the SOLO STOVE
27 Trademarks in an amount to be proved at trial, including Defendants’ profits, Solo
28 Stove’s actual damages, enhanced damages, exemplary damages, costs, prejudgment

1 and post judgment interest under at least 35 U.S.C. §§ 1125(a), 1125(c), 1116,
2 and 1117;

3 7. That the Court award Solo its reasonable attorney fees;

4 8. That the Court award and/or order such other and further relief as is just
5 and proper.

6 Dated: October 11, 2022

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A Professional Corporation
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Aaron L. Renfro

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9 By: /s/ Aaron L. Renfro
Aaron L. Renfro

10 Attorneys for Plaintiff
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