

RYAN ELLIS LAW CORPORATION

Ryan A. Ellis, Esq. (SBN: 12199)
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Las Vegas, Nevada 89146
Telephone: (702) 552-9000
Email: ryan@ryanellislaw.com

*Attorneys for Plaintiff
Brian Horowitz*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BRIAN HOROWITZ, an individual;

Plaintiff,

v.

CHRISTONE DISTRIBUTION, INC., a
Delaware Corporation; DOES I through X,
inclusive; and ROE Business Entities I through
X, inclusive,

Defendants.

Case No: 2:22-cv-01728

COMPLAINT

COMES NOW, Plaintiff Brian Horowitz (“Plaintiff” or “Horowitz”) by and through his counsel of record Ryan A. Ellis, Esq., and for his Complaint against Defendant Christone Distribution, Inc. (“Defendant” or “Christone”) states the following:

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff is a United States Citizen currently residing in Orange County, California.
2. Defendant is a Delaware corporation with a principal place of business in Las Vegas, Clark County, Nevada.
3. The claims in this case relate to violations of United States patent laws codified at 35 USCS § 271 et. seq.
4. This Court has subject matter jurisdiction.

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- a. A tire tread that is at least several times wider than the height of the sidewall of the tire;
- b. A tire tread that is relatively flat up to the shoulders of the tread that curve into the sidewall of the tire;
- c. A transition from the tread to the sidewall with a distinctly curved shoulder;
- d. Lugs that begin about the middle of the tread and curve away from the middle of the tread to the shoulder and that gradually reduce to daylight into the sidewall at the edge of the shoulder; and
- e. Every other lug curving in opposing directions and daylighting at or near opposing shoulders.

21. Defendant’s Accused Products include wheels with tire treads that practice the following:

- a. A tire tread that is at least several times wider than the height of the sidewall of the tire;
- b. A tire tread that is relatively flat up to the shoulders of the tread that curve into the sidewall of the tire;
- c. A transition from the tread to the sidewall with a distinctly curved shoulder;
- d. Lugs that begin about the middle of the tread and curve away from the middle of the tread to the shoulder and that gradually reduce to daylight into the sidewall at the edge of the shoulder; and
- e. Every other lug curving in opposing directions and daylighting at or near opposing shoulders.

22. All Accused Products made, used, offered for sale, and/or sold by the Defendant include wheels with tire treads that are substantially similar enough to the tire tread depicted in the claims of the ‘637 patent that an ordinary observer would not be able to distinguish between the ‘637 patent’s design and Defendant’s tire treads.

EXHIBIT 1

EXHIBIT 1



(12) **United States Design Patent**
Horowitz

(10) **Patent No.:** **US D757,637 S**
(45) **Date of Patent:** **** May 31, 2016**

- (54) **TREAD FOR A TIRE**
- (71) Applicant: **Brian Horowitz**, Foothill Ranch, CA (US)
- (72) Inventor: **Brian Horowitz**, Foothill Ranch, CA (US)
- (**) Term: **14 Years**
- (21) Appl. No.: **29/519,643**
- (22) Filed: **Mar. 6, 2015**
- (51) **LOC (10) Cl.** **12-15**
- (52) **U.S. Cl.**
USPC **D12/544**
- (58) **Field of Classification Search**
USPC D12/550-568, 580-604, 900
CPC B60C 11/0311; B60C 11/0316
See application file for complete search history.

D450,020	S	*	11/2001	Takagi	D12/579
D595,218	S	*	6/2009	Rodicq	D12/544
D669,020	S	*	10/2012	Sloan	D12/536
D731,401	S	*	6/2015	Harris	D12/537
2008/0142134	A1	*	6/2008	Tedesco	B60C 11/0316 152/209.12

OTHER PUBLICATIONS

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* cited by examiner

Primary Examiner — Robert M Spear
Assistant Examiner — John Voytek
(74) *Attorney, Agent, or Firm* — Morland C. Fischer

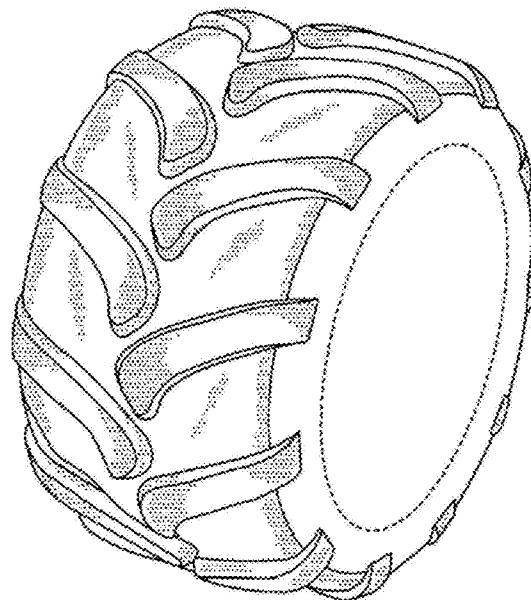
(57) **CLAIM**
The ornamental design for a tread for a tire, as shown and described.

DESCRIPTION

FIG. 1 is a perspective view showing the tread for a tire which forms my new design;
FIG. 2 is a front elevational view thereof; and,
FIG. 3 is a right side elevational view, this view and the left side elevational view being mirror images.
The broken lines showing other parts of the tire in FIGS. 1 and 3 indicating unclaimed environment and forming no part of the claim.

1 Claim, 1 Drawing Sheet

- (56) **References Cited**
U.S. PATENT DOCUMENTS
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152/209.12
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D383,426 S * 9/1997 Guidry D12/544
6,179,027 B1 * 1/2001 Shimizu B60C 11/0316
152/209.12
D444,110 S * 6/2001 Umstot D12/544



**Hor. v. Christone
Complaint
"EXHIBIT A"**

U.S. Patent

May 31, 2016

US D757,637 S

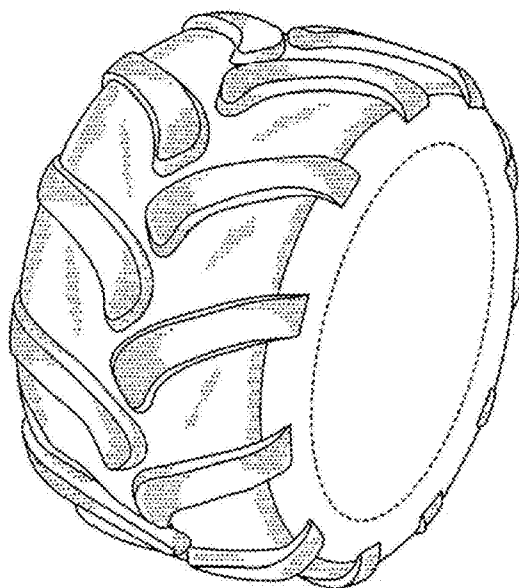


FIG. 1

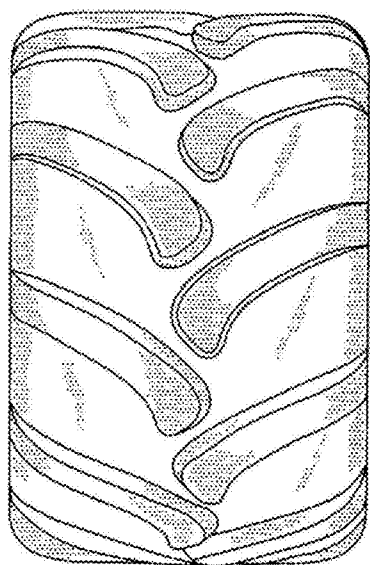


FIG. 2

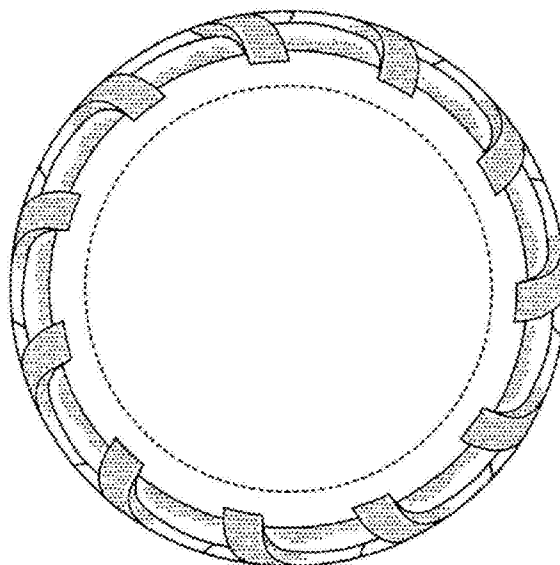


FIG. 3

EXHIBIT 2

EXHIBIT 2

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Sport, Garden, Lawn & Outdoors Cart / HORSESHOE Brand New Heavy Duty 330 Lbs Max. Load, Collapsible Folding Utility Wagon Installed Wider Flat Free All Terrain Tires, with 2 Drink Holders, Safety Belt, waterproof 600 Oxford cloth Liner & Folded Storage Bag, for Camping, Shopping, Trave, Picni



HORSESHOE Brand New Heavy Duty 330 Lbs Max. Load, Collapsible Folding Utility Wagon Installed Wider Flat Free All Terrain Tires, with 2 Drink Holders, Safety Belt, waterproof 600 Oxford cloth Liner & Folded Storage Bag, for Camping, Shopping, Trave, Picni

Altamont NY 12009, Las Vegas NV 89102, Continuous Operation, TC1012RED265-8T120BFF

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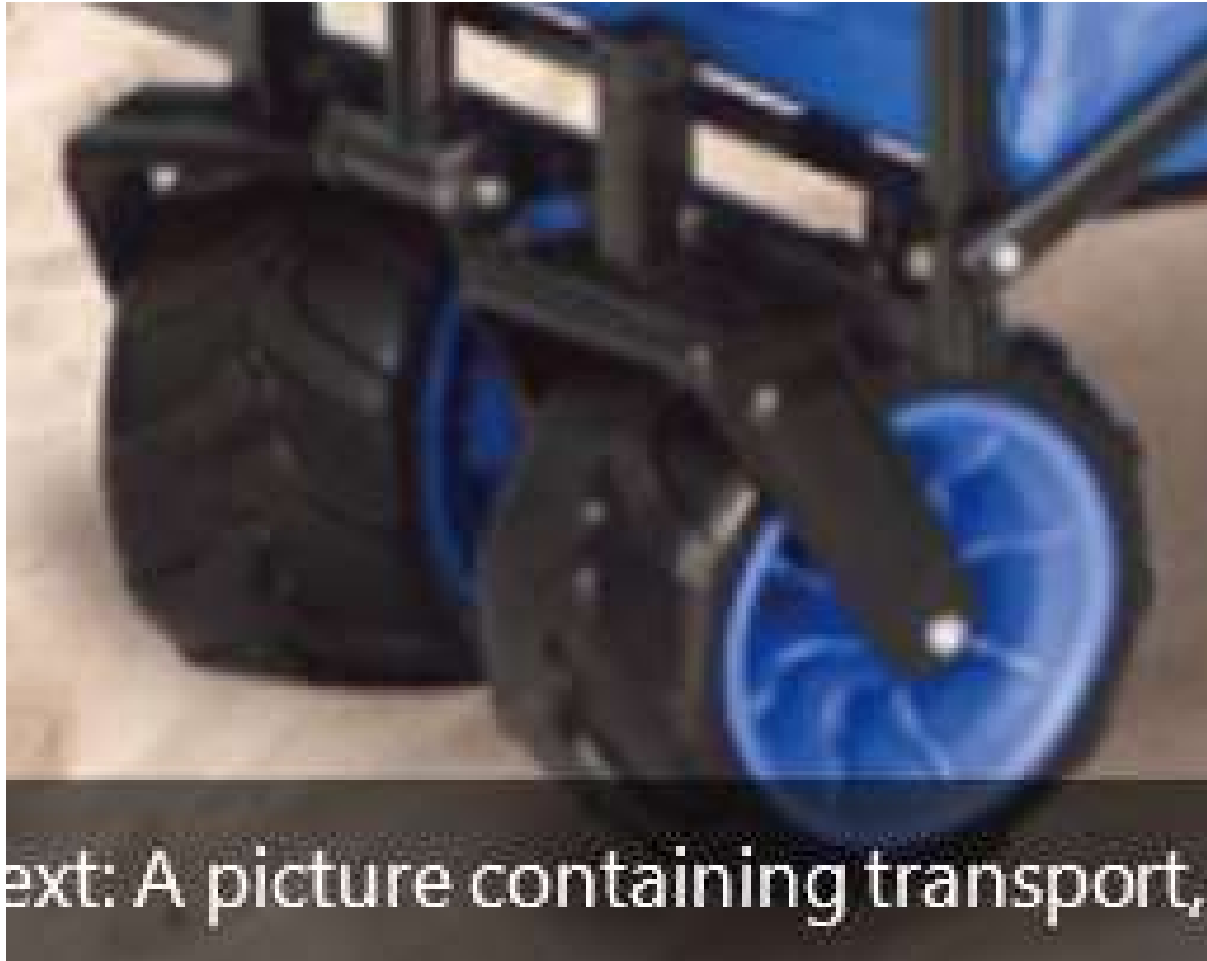


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<https://christ-one-autoparts.com/sport-garden-lawn-and-outdoors-cart/horseshoe-brand-new-heavy-duty-330-lbs-max.-load-collapsible-folding-sports-utility-wagon-installed-wider-flat-free-all-terrain-tires-with-2-drink-holders-safety-belt-waterproof-600-oxford-cloth-liner-and-folded-storage-bag-for-camping-shopping-trave/>

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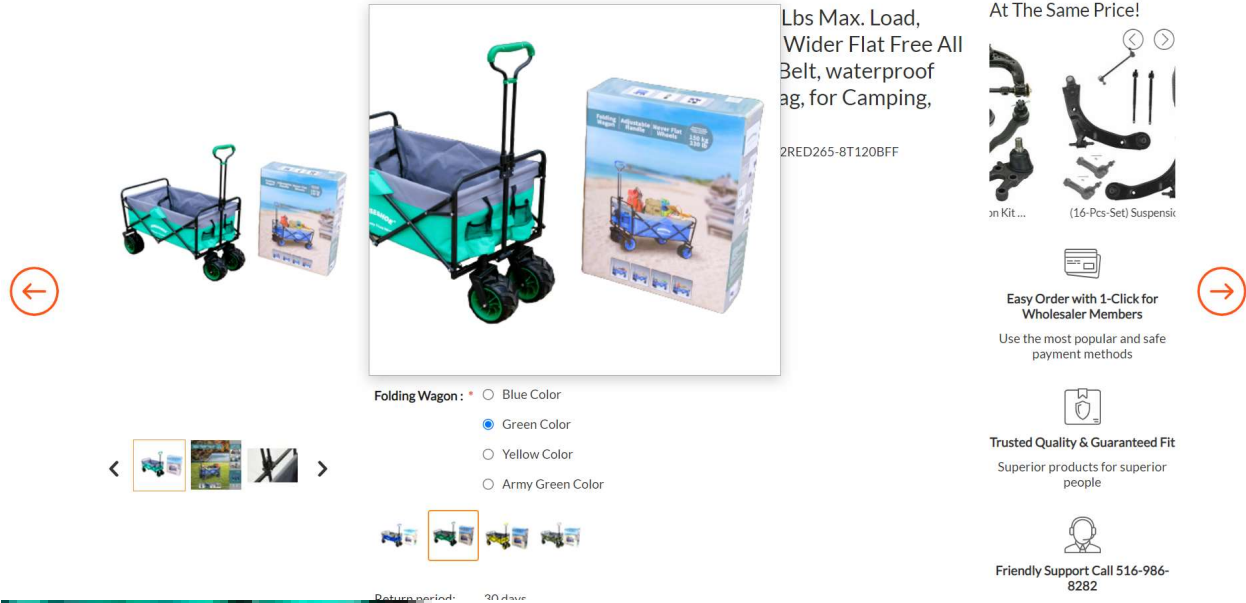
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Wider Flat Free All
Belt, waterproof
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amazon.com/HORSESHOE-Terrain-Collapsible-Folding-Shopping/dp/B09YQQ68M7/ref=sr_1_18_sspa?keywords=folding%2Bwagon&qid=1660163811&sr=8-18-spons&th=1

Amazon Home Shop by Room Discover Shop by Style Home Décor Furniture Kitchen & Dining Bed & Bath Garden & Outdoor Home Improvement

MacSports Heavy Duty Collapsible Folding All Terrain Utility... **★★★★★** 2,704 ⁺\$131.99 **prime**

Patio, Lawn & Garden > Gardening & Lawn Care > Outdoor Carts > Garden Carts

Sponsor



HORSESHOE Heavy Duty Max. Load 330LBS All Terrain Collapsible Folding Utility Wagon w/Wider Flat Free Tires, Safety Belt & Folded Storage Bag for Camping Shopping Beach Trave Picnic (Yellow)

Visit the HORSESHOE Store **★★★★★** 5 ratings

\$159⁸⁸

Pay \$26.65/month for 6 months, interest-free upon approval for the Amazon Prime Rewards Visa Card

Color:	Yellow
Product Dimensions	32"D x 23"W x 35"H
Brand	HORSESHOE
Color	Yellow
Material	Alloy Steel
Item Weight	24 Pounds

About this item

- Overview: One Set HORSESHOE Very Brand New Collapsible Folding Utility Wagon Garden Cart Installed w/Wider Flat Free Puncture Proof 7" X 4" Tires on Wheel Assembly which Manufactured on 2022!

\$159⁸⁸

FREE delivery **Friday, August 19**
[Details](#)

Or fastest delivery **Tuesday, August 16**. Order within 22 hrs 38 mins. [Details](#)

📍 Deliver to Darrell - Rogers 72758

Only 2 left in stock - order soon.

Qty: 1

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Product information

Technical Details

Product Dimensions	32"D x 23"W x 35"H
Brand	HORSESHOE
Color	Yellow
Material	Alloy Steel
Item Weight	24 Pounds
Caster Type	360°
Frame Material	Alloy Steel
Number of Wheels	4
Weight Limit	330 Pounds
Assembly Required	No
Model	All Purpose Utility Wagon, Garden Cart
Item Weight	24 pounds
Product Dimensions	32 x 23 x 35 inches
Country of Origin	China
Exterior	Steel
Manufacturer Part Number	TC1012U330-7T1488FF-YELLOW
Section Width	4 Inches
Construction	Collapsible Folding Utility Wagon Grocery Carts Installed with 7" Wider Flat Free Solid Polyurethane Form Tire and Wheel Assembly
Rim Diameter	5 Inches
Load Index Rating	330 00
Speed Rating	B
Tread Depth	4 Millimeters
Rim Width	4 Inches
Bolt Pattern (Number of Holes)	1
Bolt Pattern (Pitch Circle Diameter)	7 Inches

Additional Information

ASIN	B09YQQ68M7
Customer Reviews	★★★★★ 5 ratings 4.5 out of 5 stars
Best Sellers Rank	#52,073 in Patio, Lawn & Garden (See Top 100 in Patio, Lawn & Garden) #211 in Garden Carts
Date First Available	April 12, 2022

Warranty & Support

Product Warranty: For warranty information about this product, please click here

Feedback

Would you like to tell us about a lower price? -

https://www.amazon.com/HORSESHOE-Terrain-Collapsible-Folding-Shopping/dp/B09YQQ68M7/ref=sr_1_18_sspa?keywords=folding%2Bwagon&qid=1660163811&sr=8-18-spons&th=1

<https://christ-one-autoparts.com/sport-garden-lawn-and-outdoors-cart/horseshoe-brand-new-heavy-duty-330-lbs-max.-load-collapsible-folding-sports-utility-wagon-installed-wider-flat-free-all-terrain-tires-with-2-drink-holders-safety-belt-waterproof-600-oxford-cloth-liner-and-folded-storage-bag-for-camping-shopping-trave/>

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Altamont NY 12009, Las Vegas NV 89102, Continuous Operation, TC1012RED265-8T120BFF

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CODE: W10-112098Q1(A-Green)



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 - Green Color
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 - Army Green Color



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EXHIBIT 3

EXHIBIT 3



903 S.E. 22nd Street, Ste. 3
Bentonville, AR 72712

Office of the President
c/o Barry Zhang, Registered Agent
Christone Distribution, Inc.
3528 Wynn Rd.
Las Vegas, NV 89103

Hor. v. Christone
Complaint
"EXHIBIT C"



Darrell W. Gibby
Attorney at Law

903 S.E. 22nd St., Ste. 3
Bentonville, AR 72712

August 11, 2022

Office of the President
Christone Distribution, Inc.
3111 S. Valley View Blvd., Ste. E-118
Las Vegas, NV 89102

Re: *Brian Horowitz v. Christone, Inc.; Infringement of U.S. Patents No(s). US D757,637 S*

Dear Sir or Madam:

I represent Mr. Brian Horowitz who is the owner of the above referenced patent(s). It has come to my attention that Christone Distribution, Inc. ("Christone") has been manufacturing, importing, advertisement for sale, and/or selling certain items that embody all the elements of at least one or more claims of Mr. Horowitz's patent(s). Federal patent law codified at 35 U.S.C. § 271(a) states:

... whoever without authority makes, uses, offers to sell, or sells any patented invention, within the United States or imports into the United States any patented invention during the term of the patent therefor, infringes the patent.

I have enclosed a copy of my client's patent(s) along with images of Christone's infringing products for your review.

This letter is to demand that you cease and desist such acts of infringement and immediately provide me the following information:

- The number of units of the accused items that Christone has sold in the last six years;
- The names, addresses, telephone numbers, email addresses, and contact person(s) of all sources from which Christone received accused items;
- The quantity of unsold accused items that Christone has remaining in inventory;
- The names, addresses, telephone numbers, email address, and contact person(s) of all customers to whom Christone has sold accused items in the last six years;
- The total revenue that Christone has received from all sales of accused items in the last six years.

Upon you providing the requested information, my client will tender an offer to settle this matter with Christone. My client prefers to not have to resort to judicial enforcement of his patents, so your cooperation will be appreciated.

Please respond by Friday, August 26, 2022. If I do not hear from you by then, my client intends to take whatever measures necessary to enforce his rights under his patents.

Sincerely,

A handwritten signature in black ink, appearing to read 'Darrell W. Gibby', with a stylized flourish at the end.

Darrell W. Gibby

Enclosures



US00D757637S

(12) **United States Design Patent** (10) **Patent No.:** **US D757,637 S**
Horowitz (45) **Date of Patent:** **** May 31, 2016**

(54) **TREAD FOR A TIRE**
 (71) Applicant: **Brian Horowitz**, Foothill Ranch, CA (US)
 (72) Inventor: **Brian Horowitz**, Foothill Ranch, CA (US)
 (**) Term: **14 Years**
 (21) Appl. No.: **29/519,643**
 (22) Filed: **Mar. 6, 2015**
 (51) **LOC (10) Cl.** **12-15**
 (52) **U.S. Cl.**
 USPC **D12/544**
 (58) **Field of Classification Search**
 USPC **D12/550-568, 580-604, 900**
 CPC **B60C 11/0311; B60C 11/0316**
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 D731.401 S * 6/2015 Harris D12/537
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 152/209.12

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* cited by examiner

Primary Examiner — Robert M Spear
Assistant Examiner — John Voytek
 (74) *Attorney, Agent, or Firm* — Morland C. Fischer

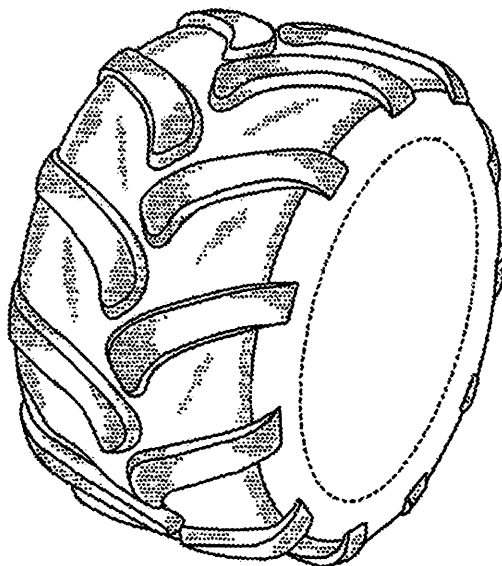
(57) **CLAIM**
 The ornamental design for a tread for a tire, as shown and described.

DESCRIPTION

FIG. 1 is a perspective view showing the tread for a tire which forms my new design;
 FIG. 2 is a front elevational view thereof; and,
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 The broken lines showing other parts of the tire in FIGS. 1 and 3 indicating unclaimed environment and forming no part of the claim.

1 Claim, 1 Drawing Sheet

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 D444,110 S * 6/2001 Umstot D12/544



U.S. Patent

May 31, 2016

US D757,637 S

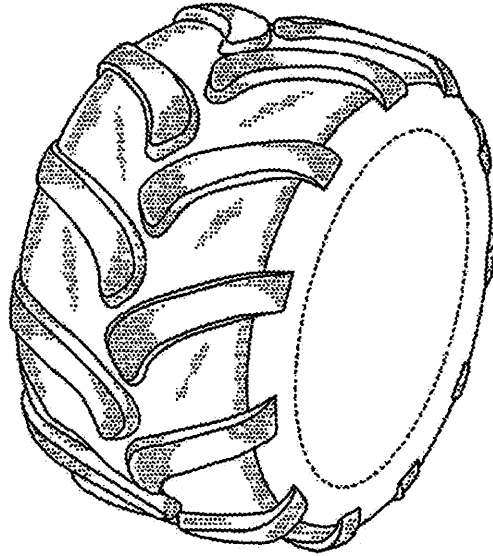


FIG. 1

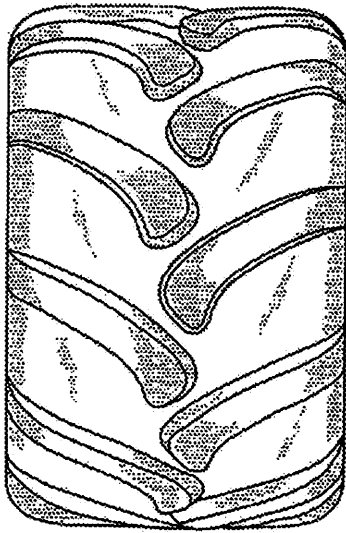


FIG. 2

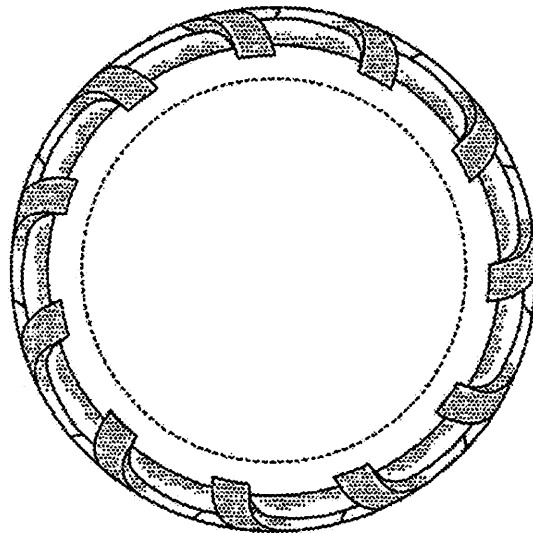


FIG. 3



US00D757637S

(12) **United States Design Patent** (10) **Patent No.:** **US D757,637 S**
Horowitz (45) **Date of Patent:** **** May 31, 2016**

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* cited by examiner

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Assistant Examiner — John Voytek
 (74) *Attorney, Agent, or Firm* — Morland C. Fischer

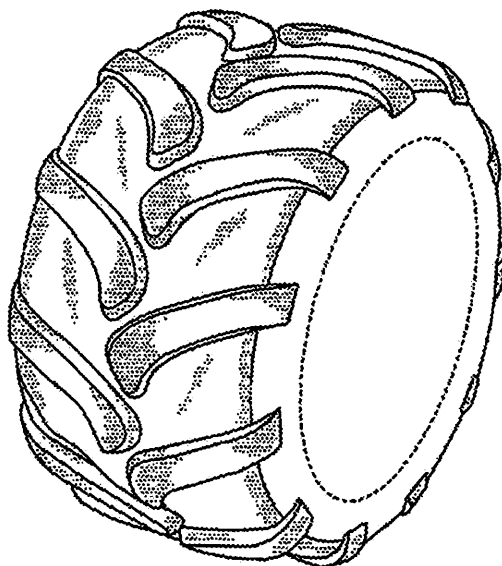
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U.S. Patent

May 31, 2016

US D757,637 S

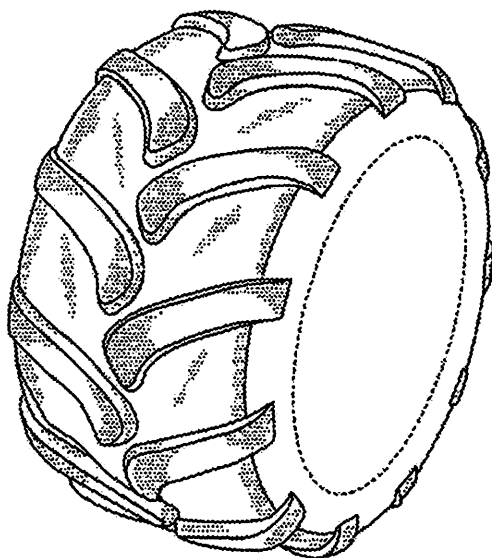


FIG. 1

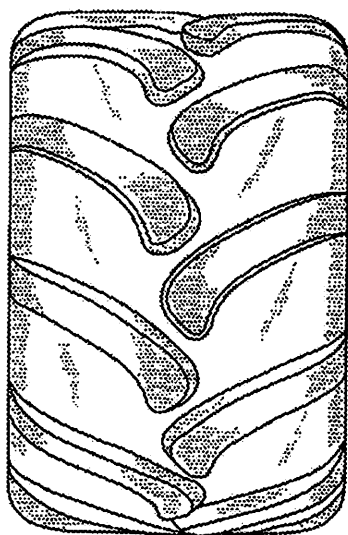


FIG. 2

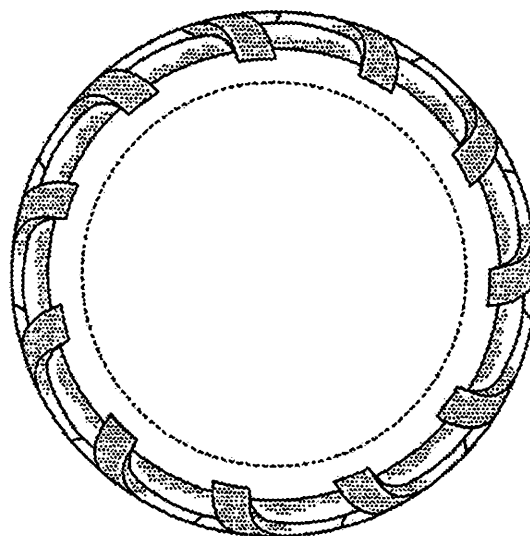


FIG. 3

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Catalog Outdoor & Garden Carts Wheel Bearing & Hub Assy Control Arm & Parts Tires & Wheels Facebook Marketplace e-Seller Wholesaler on Amazon FBA

天猫 淘宝网 京东商城 Christ One Express - 圣狄快海速通一件全到门! 圣狄海外仓自储物流派送

HORSESHOE Brand New Heavy Duty 330 Lbs Max. Load, Collapsible Folding Utility Wagon Installed Wider Flat Free All Terrain Tires, with 2 Drink Holders, Safety Belt, waterproof 600 Oxford cloth Liner & Folded Storage Bag, for Camping, Shopping, Trave, Picni



HORSESHOE Brand New Heavy Duty 330 Lbs Max. Load, Collapsible Folding Utility Wagon Installed Wider Flat Free All Terrain Tires, with 2 Drink Holders, Safety Belt, waterproof 600 Oxford cloth Liner & Folded Storage Bag, for Camping, Shopping, Trave, Picni

Altamont NY 12009, Las Vegas NV 89102, Continuous Operation: TC1012RED265-8T120BFF

Write a review

CODE: W10-112067Q1

Available at amazon.com

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Folding Wagon : Blue Color

At The Same Price!



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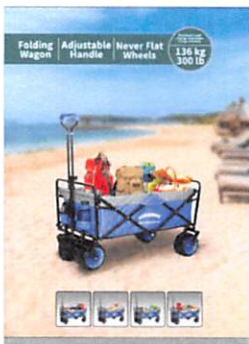
Always Free shipping on orders by 4 PM EST M-F and your order
Call 1-24-956-1292 | English (USA) | 1962 | (US\$)

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HORSESHOE Brand New Heavy Duty 330 Lbs Max. Load, Collapsible Folding Utility Wagon Installed Wider Flat Free All Terrain Tires, with 2 Drink Holders, Safety Belt, waterproof 600 Oxford cloth Liner & Folded Storage Bag, for Camping, Shopping, Trave, Picni

Altamont NY 12009, Las Vegas NV 89102, Continuous Operation. TC:1012RED265-8T120BF
[Write a review](#)
 CODE: W10-112067Q1

Available at
amazon.com

[\[Sign in to view price\]](#)
 Folding Wagon: Blue Color

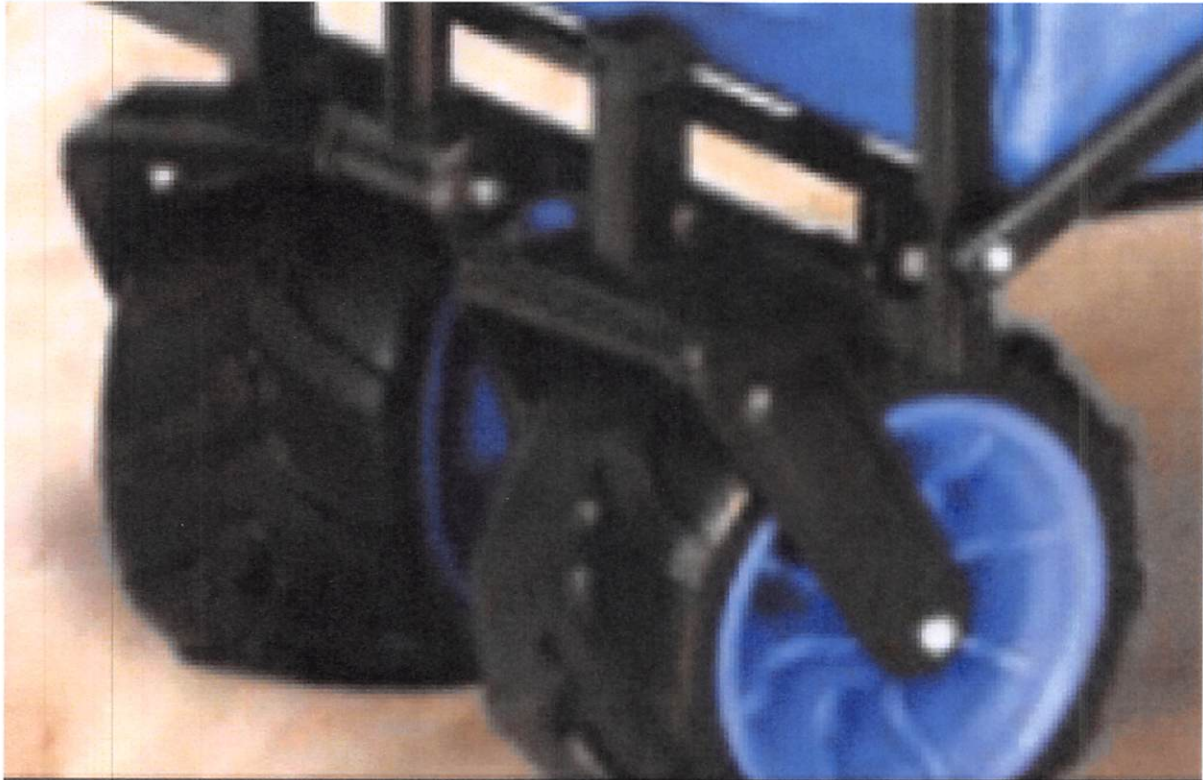
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HORSESHOE Brand New Heavy Duty 330 Lbs Max. Load, Collapsible Folding Utility Wagon Installed Wider Flat Free All Terrain Tires, with 2 Drink Holders, Safety Belt, waterproof 600 Oxford cloth Liner & Folded Storage Bag, for Camping, Shopping, Trave, Picni

Altamont NY 12009, Las Vegas NV 89102, Continuous Operation, TC1012RED2e5-8T120BFF

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CODE: W10-112081Q1(Green)

Available at **amazon.com**

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- Folding Wagon : *
- Blue Color
 - Green Color
 - Yellow Color
 - Army Green Color



Return period: 30 days

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600 Oxford cloth Liner & Folded Storage Bag, for Camping, Shopping, Travel, Picnic



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Wider Flat Free All
Belt, waterproof
ag, for Camping.

2RED265-8T120BFF

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Folding Wagon: Blue Color
 Green Color
 Yellow Color
 Army Green Color



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HORSESHOE Brand New Heavy Duty 330 Lbs Max. Load, Collapsible Folding Utility Wagon Installed Wider Flat Free All Terrain Tires, with 2 Drink Holders, Safety Belt, waterproof 600 Oxford cloth Liner & Folded Storage Bag, for Camping, Shopping, Travel, Picnic

Altamont NY 12009, Las Vegas NV 89102, Continuous Operation, TC1012RED265-8T120BFF

[Write a review](#)

CODE: W10-112067Q1(Yellow)



Available at
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- Folding Wagon: Blue Color
 Green Color
 Yellow Color
 Army Green Color



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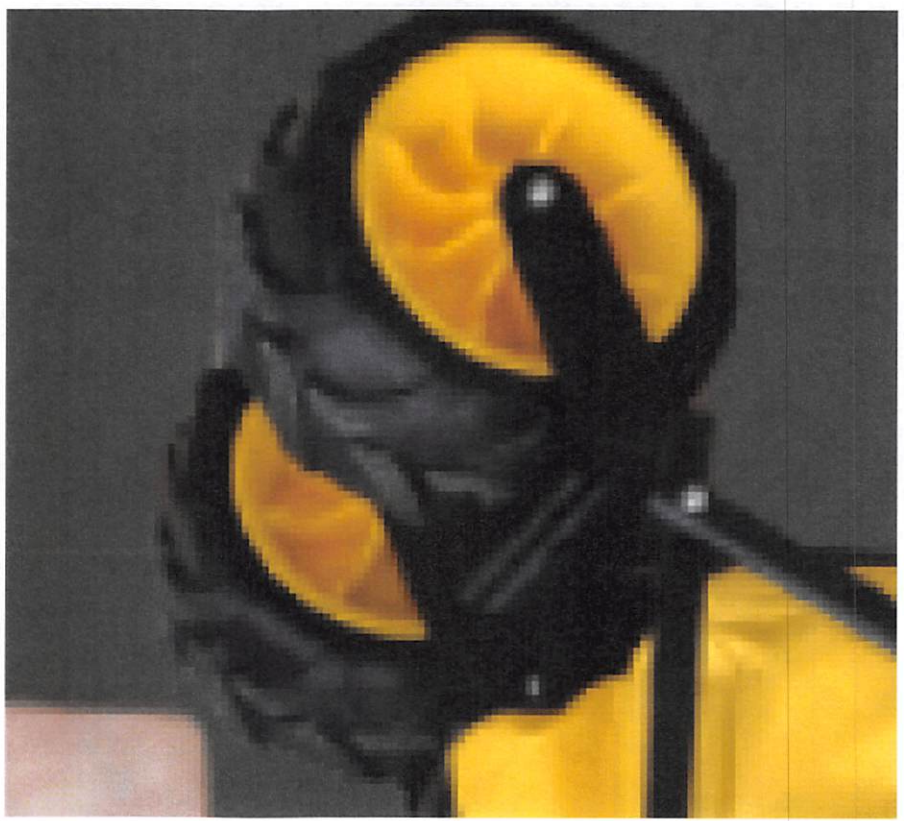
HORSESHOE Heavy Duty Max. Load 330LBS All Terrain Collapsible Folding Utility Wagon w/Wider Flat Free Tires, Safety Belt & Folded Storage Bag for Camping Shopping Beach Travel Picnic (Yellow)
 Visit the HORSESHOE Store
 5 ratings: **★★★★☆**
 \$159.88
 Pay \$26.65/month for 6 months, interest-free upon approval for the Amazon Prime Rewards Visa Card
 Color: Yellow
 Product Dimensions: 32"D x 23"W x 35"H
 Brand: HORSESHOE
 Color: yellow
 Material: Alloy Steel
 Item Weight: 24 Pounds

About this item
 Overview: One Set HORSESHOE Very Brand New Collapsible Folding Utility Wagon Garden Cart Installed w/Wider Flat Free Puncture Proof 7" X 4" Tires on Wheel Assembly which Manufactured on 2021

FREE delivery **Friday, August 19**
 Or fastest delivery **Tuesday, August 16**. Order within 22 hrs.
 58 mins. Details
 Only 2 left in stock - order soon.
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Secure transaction
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 Sold by: Kayanplus
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amazon.com/HORSESHOE-Terrain-Collapsible-Folding-Shopping/dp/B09YQQ68M7/ref=sr_1_18_sspa?keywords=folding%2Bwagon&qid=1660163811&sr=8-18-spons&th=1

Product information

Technical Details

Product Dimensions	32"D x 23"W x 35"H
Brand	HORSESHOE
Color	Yellow
Material	Alloy Steel
Item Weight	24 Pounds
Folder Type	3-Step
Frame Material	Alloy Steel
Number of Wheels	4
Weight Limit	330 Pounds
Assembly Required	No
Model	All Purpose Utility Wagon: Garden Cart
Item Weight	24 pounds
Product Dimensions	32 x 23 x 35 inches
Country of Origin	China
Exterior	Steel
Manufacturer Part Number	TC1012U330-71140BFF-YELLOW
Section Width	4 inches
Construction	Collapsible Folding Utility Wagon Grocery Cart, Installed with 7" Wider Flat Free Solid Polyurethane Firm Tires and Wheel Assembly
Rim Diameter	5 inches
Load Index Rating	330 00
Speed Rating	B
Tread Depth	4 Millimeters
Rim Width	4 inches
Bolt Pattern (Number of Holes)	1
Bolt Pattern (Pitch Circle Diameter)	7 inches

Additional Information

ASIN: B09YQQ68M7

Customer Reviews: 4.5 out of 5 stars (5 ratings)

Best Sellers Rank: #52,073 in Patio, Lawn & Garden (See Top 100 in Patio, Lawn & Garden); #211 in Garden Carts

Date First Available: April 12, 2022

Warranty & Support

Product Warranty: For warranty information about this product, please click here

Feedback

Would you like to tell us about a lower price?

https://www.amazon.com/HORSESHOE-Terrain-Collapsible-Folding-Shopping/dp/B09YQQ68M7/ref=sr_1_18_sspa?keywords=folding%2Bwagon&qid=1660163811&sr=8-18-spons&th=1

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HORSESHOE Brand New Heavy Duty 330 Lbs Max. Load, Collapsible Folding Utility Wagon Installed Wider Flat Free All Terrain Tires, with 2 Drink Holders, Safety Belt, waterproof 600 Oxford cloth Liner & Folded Storage Bag, for Camping, Shopping, Trave, Picni

Alltamt NY 12009, Las Vegas NV 89102, Continuous Operation, TC1012RED265-8T120BFF

[Write a review](#)

CODE: W10-112098Q1(A Green)



Available at **amazon.com**

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- Folding Wagon: *
- Blue Color
 - Green Color
 - Yellow Color
 - Army Green Color



Return period: 30 days

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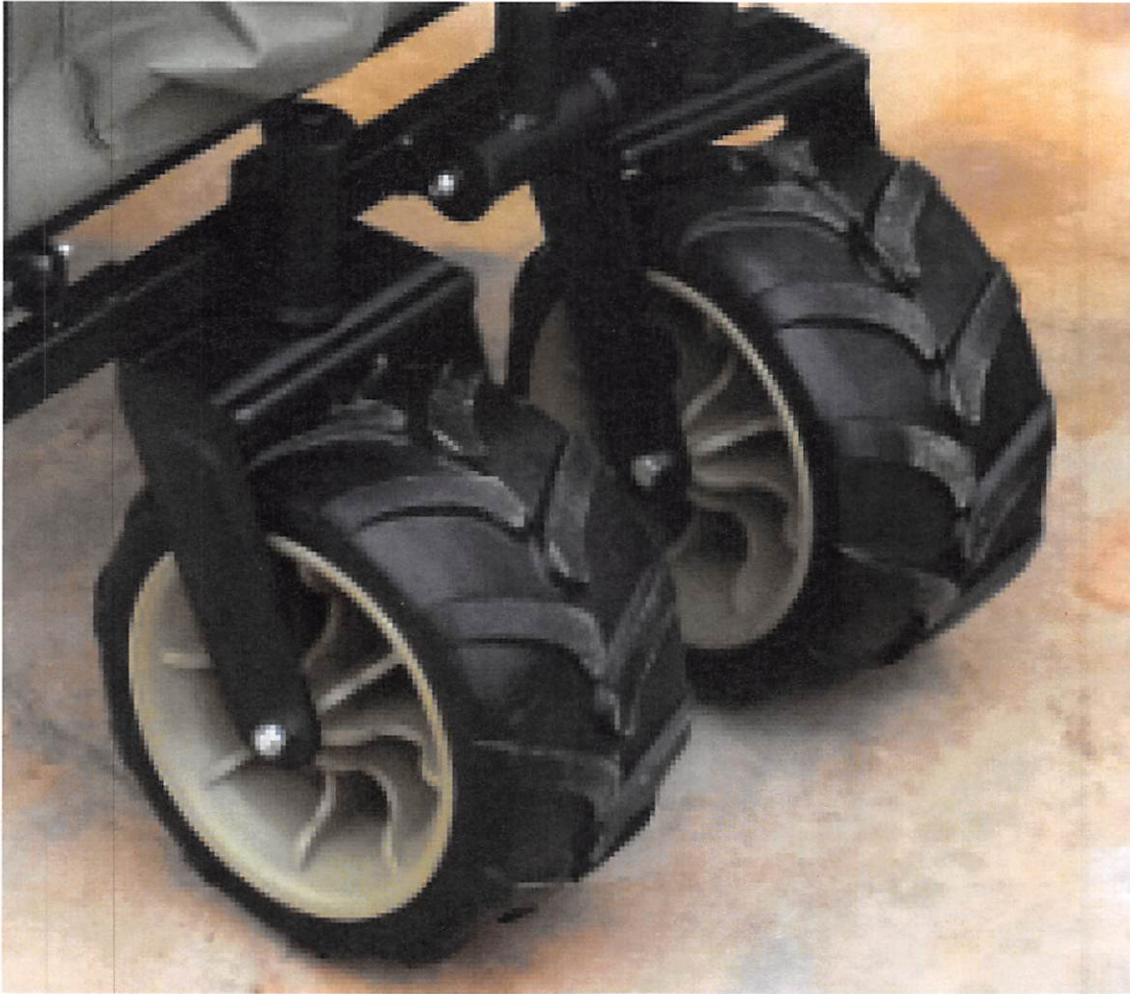
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Folding Wagon: Blue Color

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110-Pcs-Set Suspension Kit ...



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600 Oxford cloth Liner & Folded Storage Bag, for Camping, Shopping, Trave, Picni

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CODE: W10-112081Q1(Green)



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- Folding Wagon: *
- Blue Color
 - Green Color
 - Yellow Color
 - Army Green Color



Return period: 30 days

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600 Oxford cloth Liner & Folded Storage Bag, for Camping, Shopping, Trave, Picni



Lbs Max. Load,
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ag, for Camping,

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- Folding Wagon:
- Blue Color
 - Green Color
 - Yellow Color
 - Army Green Color



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HORSESHOE Brand New Heavy Duty 330 Lbs Max. Load, Collapsible Folding Utility Wagon Installed Wider Flat Free All Terrain Tires, with 2 Drink Holders, Safety Belt, waterproof 600 Oxford cloth Liner & Folded Storage Bag, for Camping, Shopping, Trave, Picni

Altamont NY 12009, Las Vegas NV 89102, Continuous Operation, TC1012RED265-8T120BFF

[Write a review](#)

CODE: W10-112067Q1(Yellow)



Available at
amazon.com

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Folding Wagon: Blue Color

Green Color

Yellow Color

Army Green Color



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MacSports Heavy Duty Collapsible Folding All Terrain Utility... ★★★★★ (2,704) \$131.99 prime

Patio, Lawn & Garden Gardening & Lawn Care Outdoor Carts Garden Carts



HORSESHOE Heavy Duty Max. Load 330LBS All Terrain Collapsible Folding Utility Wagon w/Wider Flat Free Tires, Safety Belt & Folded Storage Bag for Camping Shopping Beach Trave Picnic (Yellow)

Visit the HORSESHOE Store ★★★★★ (5 ratings)

\$159⁸⁸

Pay \$26.65/month for 6 months, interest-free upon approval for the Amazon Prime Rewards Visa Card

Color:	Yellow
Product Dimensions:	32"D x 23"W x 35"H
Brand:	HORSESHOE
Color:	Yellow
Material:	Alloy Steel
Item Weight:	24 Pounds

About this item

- Overview: One Set HORSESHOE Very Brand New Collapsible Folding Utility Wagon Garden Cart Installed w/Wider Flat Free Puncture Proof 7" X 4" Tires on Wheel Assembly which Manufactured on 2022!

\$159⁸⁸
FREE delivery **Friday, August 19**
[Details](#)
Or fastest delivery **Tuesday, August 16**. Order within 22 hrs 38 mins. [Details](#)

Deliver to Carroll - Rogers 72758
Only 2 left in stock - order soon.

Qty: 1
Add to Cart
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Return policy: Eligible for Return, Refund or Replacement within 30 days of receipt

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amazon.com/HORSESHOE-Terrain-Collapsible-Folding-Shopping/dp/B09YQQ68M7/ref=sr_1_18_sspa?keywords=folding%2Bwagon&qid=1660163811&sr=8-18-spons&th=1

Product information

Technical Details

Product Dimensions	37"D x 23"W x 35"H
Brand	HORSESHOE
Color	Yellow
Material	Alloy Steel
Item Weight	24 Pounds
Load Type	330
Frame Material	Alloy Steel
Number of Wheels	4
Weight Limit	330 Pounds
Assembly Required	No
Model	All Purpose Utility Wagon: Garden Cart
Item Weight	24 pounds
Product Dimensions	32 x 23 x 35 inches
Country of Origin	China
Exterior	Steel
Manufacturer Part Number	TC1012U130-7T14/BFF-YELLOW
Section Width	4 inches
Construction	Collapsible Folding Utility Wagon Grocery Cart Installed with: 7" Wider Flat Free Solid Polyurethane Firm Tires and Thread Assembly
Rim Diameter	5 inches
Load Index Rating	330 00
Speed Rating	B
Tread Depth	4 Millimeters
Rim Width	4 inches
Bolt Pattern (Number of Holes)	1
Bolt Pattern (Pitch Circle Diameter)	7 inches

Additional Information

ASIN: B09YQQ68M7

Customer Reviews: **★★★★☆** 5 ratings
4.5 out of 5 stars

Best Sellers Rank: #92,073 in Patio, Lawn & Garden (See Top 100 in Patio, Lawn & Garden)
#211 in Garden Carts

Date First Available: April 12, 2022

Warranty & Support

Product Warranty: For warranty information about this product, please click here

Feedback

Would you like to tell us about a lower price?

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<https://christ-one-autoparts.com/sport-garden-lawn-and-outdoors-cart/horseshoe-brand-new-heavy-duty-330-lbs-max.-load-collapsible-folding-sports-utility-wagon-installed-wider-flat-free-all-terrain-tires-with-2-drink-holders-safety-belt-waterproof-600-oxford-cloth-liner-and-folded-storage-bag-for-camping-shopping-trave/>

HORSESHOE Brand New Heavy Duty 330 Lbs Max. Load, Collapsible Folding Utility Wagon Installed Wider Flat Free All Terrain Tires, with 2 Drink Holders, Safety Belt, waterproof 600 Oxford cloth Liner & Folded Storage Bag, for Camping, Shopping, Trave, Picni

Alltamt NY 12009, Las Vegas NV 89102, Continuous Operation, TC1012RED265-8T120BFF

[Write a review](#)

CODE: W10-112098Q1(A-Green)



Available at **amazon.com**

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- Folding Wagon: *
- Blue Color
 - Green Color
 - Yellow Color
 - Army Green Color



Return period: 30 days

At The Same Price!



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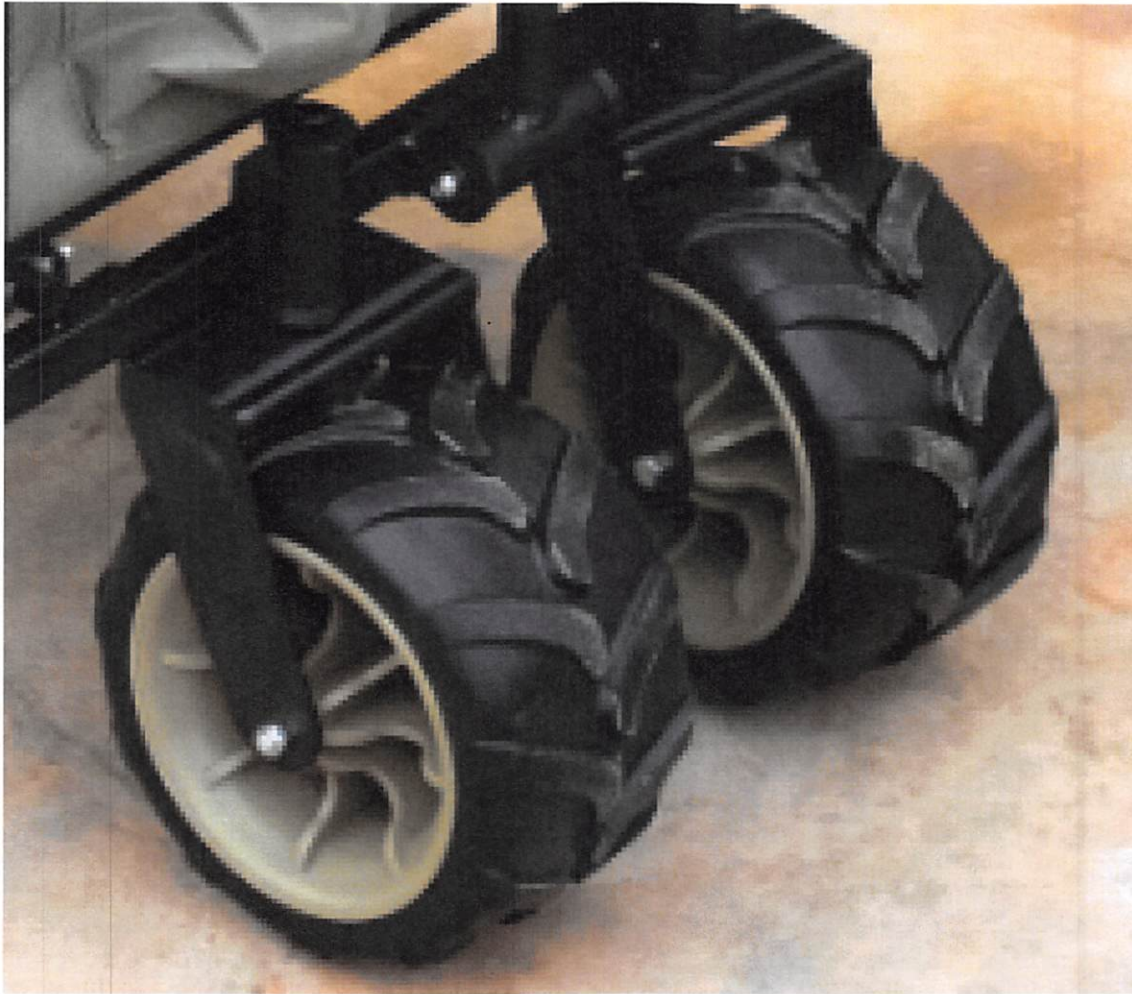
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EXHIBIT 4

EXHIBIT 4

CHRISTONE DISTRIBUTION INC

3111 S Valley View Blvd., Ste E-118
Las Vegas, NV 89102

August 22, 2022

Attn: Attorney at Law - Darrell W. Gibby
Gibby Law Firm PLLC
903 S.E. 22nd St., Ste. 3
Rentonville, AR 72712
Represent Mr. Brian Horowitz

Re: Reply for letter of Brian Horowitz v. Christone, Inc.: Infringement of U.S. Patents No(s). US D757.637 S dated on 11st, Aug, 2022

Dear Mr. Darrell W Gibby and Mr. Brian Horowitz,
So sorry we received your subject letter told us that the tires pattern installed on our newly imported and listing on Amazon wagon cart infringing of Mr. Brian registered Patent No. US D757,637 S patent right.

Frankly speaking before received your letter several weeks ago we have received the notice from Amazon attention us that the patent owner claimed subject item infringing pattern right so we have right now delisted subject item on Amazon and stop selling.

Before we received the Amazon's notice we really didn't know and nobody told us that one of the china manufacturer recommended type of wagon tires pattern infringing any patent right otherwise we will never touch it.

Frankly speaking this wagon cart is the first time we imported from china to USA as a trial order for ready to test sell on Amazon market and to see whether it is good selling on Amazon and if good selling then we will expand import in lots. this trial order we negotiated with Factory and finalized purchase order on middle of This Mar. and we received the item around at this middle of Apr. and we start to list on Amazon selling at the end of Apr. and the selling details as your request please see following:

- 1) Start selling at end of Apr. 2022 and Total 218 Units Wagon cart (in fact sold 240 but Amazon consumers returned 22 Units) related to Mr. Brian Horowitz claimed item which installed Tires pattern may infringement his patent right in the last six years;
- 2) Subject wagon cart we purchased and imported from manufacturer:
Qingdao Longwin Industry Co., LTD.
Address: No. 317 Leigongshan Road, Huangdao District, Qingdao, China
Tel: 86-532-83196119
Fax: 86-532-83197792

Hor v. Christone
Complaint
"EXHIBIT D"

Contact Person: Ella Meng
Email: Sale9@juststoragerack.com

*FYI, As we knows that this factory is just a wagon cart and rack manufacturer where we purchased whole completed wagon cart (installed with Mr. Brian claimed those patent tires), so sorry we really don't knows where is this factory bought those pattern tires from where and what's their purchased sources.

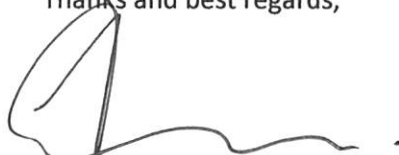
- 3) The quantity of unsold that we have in inventory is 166 Units (in fact 178 Units but Amazon consumers returned damaged unit which cannot be resale again is 12 Units);
- 4) We only sold subject wagon cart on Amazon marketplace where start from the end of this Apr. 2022;
- 5) The Total net revenue that we received from Amazon for subject wagon cart is around \$25000 - \$27000;

Dear sir, We would like to negotiate with Mr. Brian for whether we can continue to sold out our remaining stocked 166 Units wagon carts with his claimed patents right pattern tires so please tell him our contact way is as following:

Christone Distribution Inc.
Tel: 702-816-0476
Email: Jing890617@hotmail.com or Akingwang7@gmail.com

Awaiting for further instruction and information,

Thanks and best regards,

A handwritten signature in black ink, appearing to be 'Jing Liu', with a long, wavy underline.

Jing Liu
President of
Christone Distribution Inc

22rd, Aug, 2022