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7 NINGO HYDERON HARDWARE CO. LTD  
8 and LIFENG ZHANG

9 **IN THE UNITED STATES DISTRICT COURT**  
10 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

12 NINGO HYDERON HARDWARE CO. LTD, a  
13 Chinese limited company, and LIFENG  
14 ZHANG, individually,

14 Plaintiff,

15 vs.

16 MINNARK GROUP, LLC, a Minnesota Limited  
17 Liability,

18 Defendants.

Case No.: 2:23-cv-09886

Assigned:

**COMPLAINT FOR DESIGN PATENT  
INFRINGEMENT**

**DEMAND FOR JURY TRIAL**

21  
22 Plaintiffs, Ningo Hyderon Hardware Co., Ltd. (“Hyderon”) and Lifeng Zhang, “Zhang”,  
23 collectively with Hyderon, “Plaintiffs”), by and through their undersigned counsel, allege as  
24 follows for its Complaint for Design Patent Infringement arising under the Patent Laws of the  
25 United States, 35 U.S.C. § 1, et seq., against Defendant MinnARK Group, LLC (“MinnARK”):  
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**NATURE OF ACTION**

1. Plaintiffs are filing this suit to put an end to MinnARK’s continued patent design infringement.

**THE PARTIES**

2. Hyderon, at all relevant times mentioned in this Complaint, was a Chinese limited company, with its principal place of business in Zhejiang Province, China. Hyderon specializes in furniture hardware accessories, including *inter alia*, furniture sliders, pads, gliders and inserts, which are sold and distributed worldwide.

3. Zhang, at all relevant times mentioned in this Complaint, was a resident of China and owner of Hyderon.

4. MinnARK is a limited liability company, organized and existing under the laws of the State of Minnesota, with a principal place of business located at 1932 Shawnee Rd, Eagan, MN, 55122. On information and belief, MinnARK provides to the U.S, and world markets a wide range of products including a myriad of home products and goods.

**JURISDICION AND VENUE**

5. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C §§ 1331 (federal question) and 1338(a) (any Act of Congress relating to patents or trademarks).

6. Upon information and belief, this Court has specific personal jurisdiction over MinnARK because MinnARK has committed and continues to commit acts of infringement in violation of 35 U.S.C. § 271 and places infringing products into the stream of commerce, with the knowledge or understanding that such products are sold in the State of California, including in this District. The acts by MinnARK cause injury to Plaintiffs within this District. Upon information and belief, MinnARK derives substantial revenue from the sale of infringing products within this District, expect their actions to have consequences within this District, and derive substantial revenue from interstate and international commerce.

7. Venue for this action is proper in the Central District of California pursuant to 28 U.S.C. §§ 1391(b), (c) and 1400(b).

**PATENT-IN-SUIT: THE D'218 PATENT**

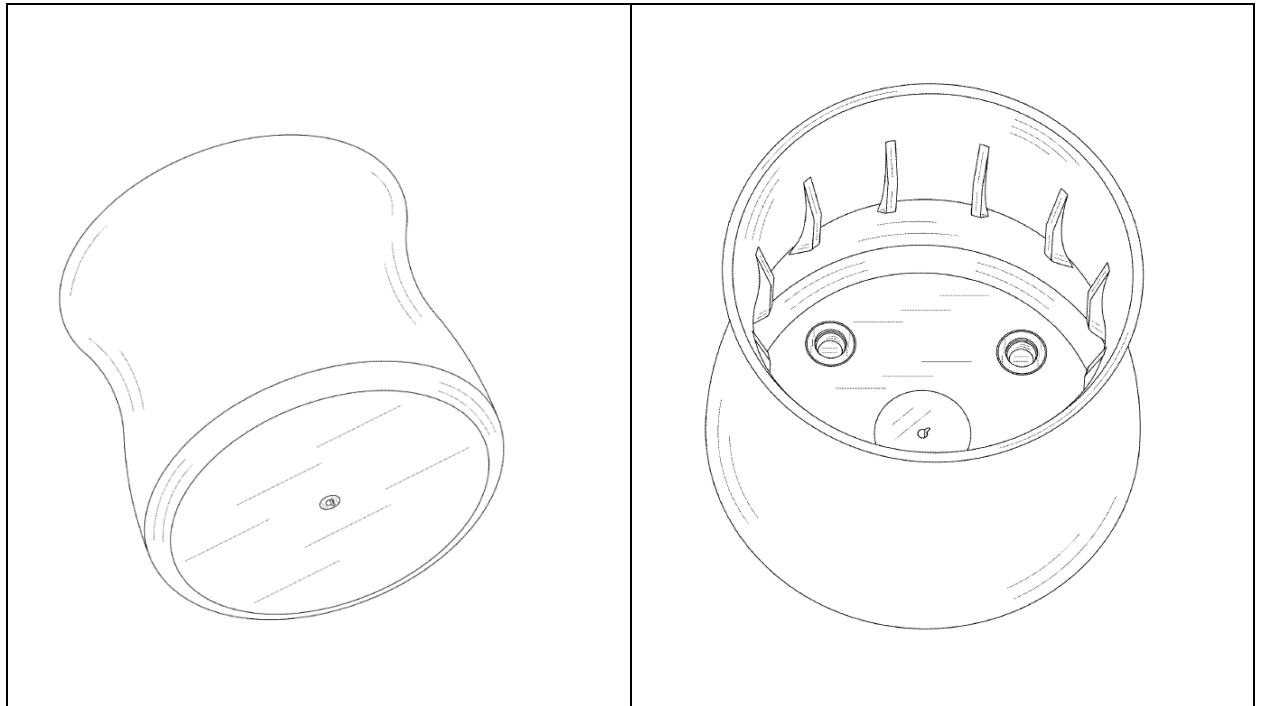
8. Zhang is an entrepreneur and innovator of cutting-edge products that receive world-wide popularity and marketplace demand through his entity Hyderon.

9. Plaintiffs expended considerable time and money seeking federal protection for their innovative designs through a broad range of intellectual property rights, including patents.

10. Among the patents that Plaintiff received is United States Design Patent No. 981,218 (the “D’218 Patent”) titled “Furniture Round Leg Tips” (hereinafter “Furniture Tips”), filed on November 27, 2020 (Application No. 29760056), and was duly and validly issued by the United States Patent and Trademark Office on March 21, 2023. A true and correct copy of the D’218 Patent is attached to and incorporated herein as Exhibit 1. The D’218 is active.

11. The full perspective views of the Furniture Tips claimed by the D’218 Patent design follows:

**D’218 Patent – Perspective Views**



12. The D’218 Patent comprises of the following ornamental and non-functional elements:

- a) an overall cylinder shape that is concaved at the half-way mark other than a straight cylinder; and

1 b) discrete interior ridges that align only with concave feature of the Furniture Tip in  
2 lieu of interior ridges running from top to bottom (which are more visible)

3 13. Plaintiffs’ unique cylinder concave patented design Furniture Tips delivered a much-  
4 desired result and advanced the use of tips furniture legs, chairs, bar stools and wired leg  
5 accessories.

6 14. Plaintiffs are the owner by assignment of all right, title, and interest in the D’218 Patent,  
7 including all rights to sue and collect for past, present, and future damages. *See* Exhibit 1.

8 **MINNARK’S WILLFUL INFRINGEMENT**

9 15. Since as early November 2020, Plaintiffs’ Furniture Tips (D’218 Patent) has been  
10 popularized as one of the more sought-after furniture leg tips as a superior and durable solution  
11 for the protection of floor surfaces by protecting against scratching and marring floor surfaces as  
12 well as preventing snags in rugs and carpets. The clear and transparent durable rubber material  
13 coupled with the round cylinder concave shape design of the Furniture Tips provides a desirable  
14 seamless and aesthetic component distinguishing it from other chair tips in the marketplace that  
15 are far less discrete. These Furniture Tips have a unique patented design, which is protected by  
16 the D’218 Patent.

17 16. Plaintiffs practice the D’218 Patent domestically and worldwide, successfully marketing,  
18 selling and distributing the Furniture Tips embodying the D’218 Patent through various  
19 channels, including partnering with third party distributors and ecommerce marketplace retailers.

20 17. Exemplars of Plaintiffs’ Furniture Tips found for sale online through authorized third  
21 party ecommerce marketplace retailers can be found at the following links:

22 <https://magicsliders.com/collections/shop-all/products/magic-fit-1-1-2-1-3-4-round-felt-4-pack>

23  
24 <https://parkerbailey.com/parker-bailey-felt-feet-24-piece-value-pack/>

25  
26 [https://www.amazon.com/COVERCORNER-Protectors-Premium-Scratching-Furniture-  
27 Protection/dp/B09J4T9MX9?ref\\_=ast\\_sto\\_dp](https://www.amazon.com/COVERCORNER-Protectors-Premium-Scratching-Furniture-Protection/dp/B09J4T9MX9?ref_=ast_sto_dp)  
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**MinnARK’s Infringing Product**

18. Attempting to capitalize on Plaintiffs’ hard work, intellectual property, and success, and *without* compensating Plaintiffs or obtaining a license, MinnARK illegally and willfully misappropriated the patented design of Plaintiffs’ Furniture Tips to create near replica furniture tips, which is sold under various names including: “MinnARK Flooring Premium Chair Tips”, “Flexible Furniture Leg Sliders” and “Premium Furniture Tips, 8 pcs, Rubber, by MinnArk” (collectively, the “Infringing Product” or “MinnARK Chair Tips”).

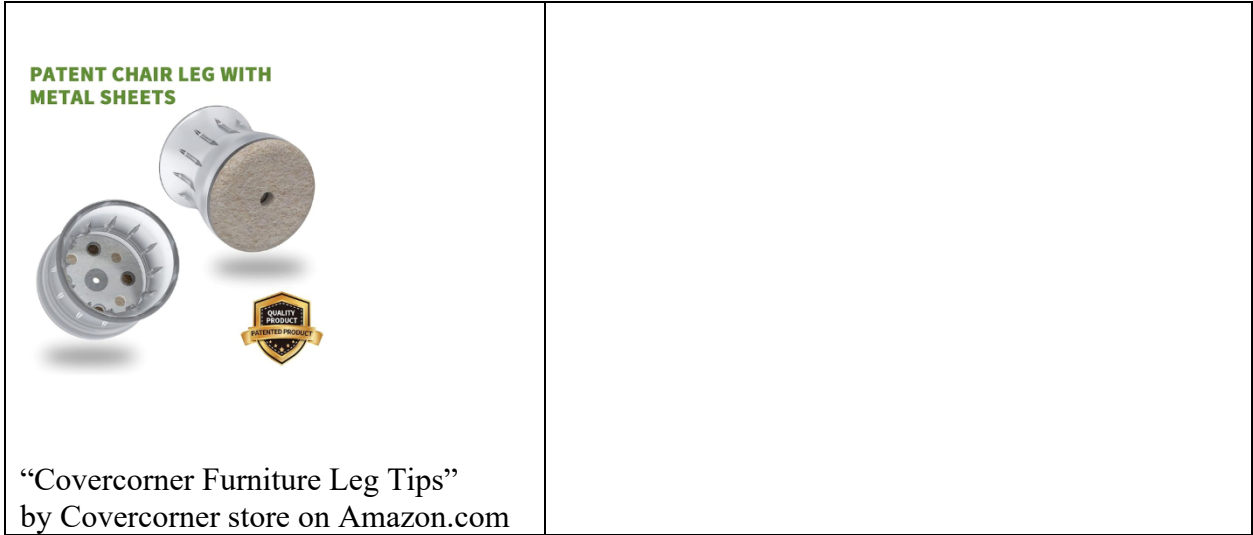
19. The MinnARK Chair Tips (Infringing Product) can be found for sale online by ecommerce marketplace retailers such as Walmart.com at the following link, a true correct download of same which is attached hereto as **Exhibit 2:**

<https://www.walmart.com/ip/seort/1020780588>

20. A side-by-side comparison shown below reveals that MinnARK misappropriated Plaintiffs’ patented Furniture Tips (D’218 Patent) with MinnARK’s Infringing Product.

| D’218 Patented Furniture Tips   | MinnARK’s Infringing Product  |
|---|---|
|  <p>“MagicFit” by MagicSliders</p>         |  <p>“Chair Tips” sold on Walmart.com</p> |
|  <p>“Felt Feet” by Parker &amp; Bailey</p> |   |

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21. Images of the D’218 Patented Furniture Tips demonstrate glaring similarity with MinnARK’s Infringing Product / “Chair Tips”. Both feature a round cylinder concave shape, wherein the concave indentation appears at the half-way mark of the tip, with interior circumferential ridges at the half-way mark. Although there are countless embodiments MinnARK could have employed as a furniture leg chair tip solution, MinnARK instead copied Plaintiffs patented design nearly identically.

22. The design of MinnARK’s Infringing Product is near indistinguishable, if not an exact copy, to the D’218 Patent such as to deceive an ordinary observer into inducing him or her to purchase MinnARK’s Infringing Product supposing them to be Plaintiffs.

23. Although to the ordinary observer the MinnARK’s Infringing Product appears to be one in the same with Plaintiffs Furniture Tips, the quality and material make-up of the two products are very distinct.

24. Expanding on the above, further aggravating MinnARK’s infringement and damage to Plaintiffs is the poor quality of MinnARK’s Infringing Product, which is far inferior in quality as compared to Plaintiffs’ Furniture Tips, which is made from durable tear resistance raw rubber material. This is not the case with MinnARK’s imitation Infringing Product, which is made of cheap synthetic rubber, prone to tear and customer dissatisfaction, thereby tarnishing Plaintiffs’ goodwill and reputation.

25. MinnARK’s conduct in making, using, selling, offering to sell and/or importing the

1 Infringing Product directly infringes the D’218 Patent.

2 26. MinnARK’s infringement of the D’218 Patent in connection with the MinnARK  
3 Infringing Products is willful.

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5 **Plaintiffs’ Cease and Desist to MinnARK Goes Ignored**

6 27. Prior to the filing of this Complaint, on October 2, 2023, Plaintiffs, through their  
7 attorney, sent MinnARK a cease-and-desist letter (“Cease and Desist”) with copy of the D’218  
8 Patent Application seeking to enforce its D’218 Patent against MinnARK’s unlawful sale of the  
9 Infringing Product in the ecommerce marketplace. The Cease and Desist more specifically  
10 demanded the immediate removal of MinnARK’s Infringing Product on Walmart.com insofar as  
11 it was blatant copy and near clone product to Plaintiffs’ D’218 Patent(ed) Furniture Tips.

12 28. MinnARK’s attorney responded to Plaintiffs’ Cease and Desist the following day,  
13 literally contesting the validity of Plaintiffs’ D’218 Patent. A true and correct copy of  
14 correspondences between Plaintiffs’ counsel and MinnARK’s counsel is attached and  
15 incorporated herein as **Exhibits 3 and 4**.

16 29. Accordingly, MinnARK has had actual knowledge of Plaintiffs’ D’218 Patent and  
17 infringement since, at the very latest, since October 2, 2023.

18 30. Nevertheless, MinnARK continued to list and sell the Infringing Product on  
19 Walmart.com.

20

21 **MinnARK’s Continued Infringement of Plaintiffs’ D’218 Patent**

22 31. To this day, MinnARK continues to sell their Infringing Product in blatant disregard of  
23 Plaintiffs’ D’218 Patent and Plaintiffs’ October 2, 2023 Cease and Desist providing notice that  
24 MinnARK is infringing.

25 32. Plaintiffs applied for the D’218 Patent on November 27, 2020 (Application No.  
26 29760056). The D’218 Patent was issued on March 21, 2023.

27 33. By contrast, a record of MinnARK’s listing of the Infringing Product on the  
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1 Walmart.com website shows that MinnARK did not list the Infringing Product for sale until late  
2 April or early May 2023, which is irrefutably after the issuance date of the D'218 Patent and  
3 several years after Plaintiffs initially filed their patent application.

4 34. Therefore, based on the foregoing public records and on information and belief,  
5 MinnARK first began selling its Infringing Product online well after Plaintiffs' D'218 Patent and  
6 has continued to sell the Infringing Product *after* it received Plaintiffs' Cease and Desist.

7 35. MinnARK's infringement of Plaintiffs' D'218 Patent identified in this Complaint  
8 provides MinnARK with domestic and worldwide ecommerce exposure for this Infringing  
9 Product that is the result of Plaintiffs' innovation and intellectual property, not MinnARK.  
10 MinnARK has not obtained permission from Plaintiff to use or license its D'218 Patent.

11 36. MinnARK has actual knowledge of the D'218 Patent and knows or should know that its  
12 Infringing Product and its conduct in relation to the Infringing Product infringes the D'218  
13 Patent. Accordingly, MinnARK's infringement is and has been willful, wanton, malicious, bad  
14 faith, deliberate, consciously wrongful, made with reckless disregard, and/or flagrant.

15  
16 **CLAIM FOR RELIEF**

17 37. Plaintiffs repeat and reallege the allegations of the foregoing Paragraphs as if fully set forth  
18 herein.

19 38. Plaintiffs are the owner of the D'218 Patent.

20 39. MinnARK has directly infringed and is still knowingly infringing the D'218 Patent under  
21 3 U.S.C. §271(a), literally and/or under the doctrine of equivalents, by selling and/or offering to  
22 sell and/or importing into the United States the "MinnARK Chair Tips ", of which embody the  
23 design covered by Plaintiffs' D'218 Patent.

24 40. In addition, MinnARK has infringed and is still knowingly infringing the D'218 Patent in  
25 this country, through, *inter alia*, its active inducement of others, including ecommerce marketplace  
26 retailers such as Walmart, to sell products that embody the designed covered by the D'218 Patent.  
27 This conduct constitutes infringement under 35 U.S.C. § 271(b).

28 41. MinnARK's infringement is and has been willful, as MinnARK has known that Plaintiffs



1 are the owner of the D'218 Patent since at least October 2, 2023, but intentionally and consciously  
2 proceeded to sell the Infringing Product and induce ecommerce marketplace retailers to infringe  
3 the D'218 Patent. Plaintiffs have been damaged, in an amount to be determined, as a direct and  
4 proximate result of MinnARK's willful infringement of the D'218 Patent.

5  
6 **PRAYER FOR RELIEF**

7 WHEREFORE, Plaintiffs respectfully request the Court to enter judgment in favor of  
8 Plaintiffs and against the Defendants as to all claims asserted herein as follows:

9 A. Granting a judgment that Defendants have infringed the D'218 Patent;

10 B. An injunctive order and judgment permanently enjoining Defendants and their officers,  
11 directors, agents, servants, employees, affiliates, attorneys, and all others acting in privity or in  
12 concert with them, and their parents, subsidiaries, divisions, successors and assigns, from further  
13 acts of infringement of the D'218 Patent;

14 C. An accounting of Defendants' profits;

15 D. A judgment awarding to Plaintiffs Defendants' total profits pursuant to 35 U.S.C. § 289;

16 E. An order for Defendants to pay to Plaintiffs actual damages adequate to compensate for  
17 the infringement in the form of a reasonable royalty for the use made of the patented inventions  
18 by Defendants, together with pre-judgment and post judgment interest and costs, in accordance  
19 with 35 U.S.C. § 284;

20 F. Granting a judgment that Defendants' infringement was willful and ordering Defendants  
21 to pay to Plaintiff increased damages of three times the compensatory damages, in accordance with  
22 35 U.S.C. § 284;

23 G. Granting a judgment that this case is exceptional under 35 U.S.C. §285 due to  
24 Defendants' willful infringement and ordering Defendants to pay to Plaintiffs their reasonable  
25 attorney fees incurred in this action; and

26 H. Granting Plaintiffs such other and further relief as this Court may deem just and proper.  
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Dated: November 20, 2023

**YANG LAW OFFICES**

By: /s/ Elizabeth Yang  
Elizabeth Yang, Esq.  
Kat Kazemi, Esq.  
Attorneys for Plaintiffs  
NINGO HYDERON HARDWARE CO.  
LTD and LIFENG ZHANG

**DEMAND FOR JURY TRIAL**

Pursuant to Federal Rule of Civil Procedure 38 and Central District of California L.R. 38-1, Plaintiffs NINGO HYDERON HARDWARE CO. LTD and LIFENG ZHANG hereby demand trial by jury on all issues so triable.

Dated: November 20, 2023

**YANG LAW OFFICES**

By: /s/ Elizabeth Yang  
Elizabeth Yang, Esq.  
Kat Kazemi, Esq.  
Attorneys for Plaintiffs,  
NINGO HYDERON HARDWARE CO.  
LTD and LIFENG ZHANG