

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

SHENZHEN JISU TECHNOLOGY CO.,
LTD.,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS, AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE A,

Defendants.

Civil Action No.

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff Shenzhen Jisu Technology Co., Ltd. (“Plaintiff” or “Jisu”) hereby brings the present patent infringement action against the Individuals, Corporations, Limited liability Companies, Partnerships, and Unincorporated Associations identified on Schedule A (collectively, “Defendants”), attached hereto, and alleges as follows:

INTRODUCTION

1. Plaintiff is the owner of three related patents for [REDACTED], i.e., U.S. Patent Nos.

[REDACTED]

[REDACTED] (collectively, the “Asserted Patents”). *See* Exhibits A-1, A-2, and A-3.

2. Plaintiff files this action to combat Defendants’ acts of infringement of the Asserted Patents by making, using, importing, selling, and/or offering for sale unauthorized and unlicensed products, namely [REDACTED] shown in Exhibits B-1 to B-20 (the “Accused Products”). The Defendants operate several [REDACTED] storefronts intended to generate the appearance of

selling authentic products while actually selling the infringing Accused Products to unbeknownst consumers. The storefronts operated by the Defendants share unique identifiers, such as same or substantively similar product images and description, advertisement, store design elements and layout, and price. Furthermore, the Accused Products all share identical or substantively similar infringing components and technical features. That made them infringe the Asserted Patents in the same or substantially similar manner. *See* Exhibits C-1, C-2, and C-3. The foregoing facts establish a logical relationship between the Defendants and suggest that Defendants' operation arises out of the same transaction, occurrence, or series of transactions or occurrences. Defendants attempt to avoid liability by going to great lengths to conceal both their identities and the full scope and interworking of their operation. Plaintiff has been and continues to be irreparably damaged from the loss of market share and erosion of its lawful patent rights as a result of Defendants' actions and therefore seeks injunctive and monetary relief.

PARTIES

3. Plaintiff Jisu is a Chinese limited liability company with its principal place of business at Room 301, Building B, #17 Yongxiang East Road, Longgang District, Shenzhen, China. Jisu is the current assignee of the Asserted Patents.

4. Upon information and belief, Defendants are unidentified individuals and business entities who own and/or operate one or more of the e-commerce stores under at least the seller aliases identified in Schedule A attached hereto (the "Seller Aliases") and/or other seller aliases not yet known to Jisu. Defendants conduct business throughout the United States, including within Illinois and this judicial district, through at least the fully interactive e-commerce stores operating under the Seller Aliases.

5. Upon information and belief, Defendants reside and/or operate in the People's Republic of China or other foreign jurisdictions. Defendants have the capacity to be sued pursuant to Federal Rule of Civil Procedure 17(b).

JURISDICTION AND VENUE

6. This action arises from Defendants' unlawful infringement of the Asserted Patents under the patent laws of the United States, 35 U.S.C. § 1 *et seq.* This Court has subject matter jurisdiction over the claims in this action pursuant to the provisions of the Patent Act, 35 U.S.C. § 1 *et seq.*, and 28 U.S.C. §§ 1331 and 1338.

7. This Court may properly exercise personal jurisdiction over Defendants since each of the Defendants directly conducts business activities toward consumers in the United States, including Illinois, through at least the fully interactive e-commerce stores operating under the Seller Aliases. Specifically, Defendants have targeted sales to Illinois residents by setting up and operating e-commerce stores. These stores target United States consumers using one or more Seller Aliases, offer shipping to the United States, including Illinois, accept payment in U.S. dollars, and, on information and belief, have sold products infringing Jisu's patented technology to residents of Illinois. Each of the Defendants is committing tortious acts in Illinois, is engaging in interstate commerce, and has wrongfully caused Jisu substantial injury in the State of Illinois.

8. Venue is therefore proper in this Court pursuant to 28 U.S.C. § 1391(b)(3), because Defendants are foreign entities that can be sued in any judicial district in the United States in which any of the Defendant is subject to this Court's personal jurisdiction.

9. Joinder is proper in this matter pursuant to 28 U.S.C. § 299. Upon information and belief, Defendants are an interrelated group of infringers working in active concert to knowingly and willfully make, use, offer for sale, sell, and/or import into the United States for subsequent sale or use the same or substantially similar Accused Products in the same transaction, occurrence,

or series of transactions or occurrences. For example, e-commerce stores operating under the Seller Aliases include notable common features, such as use of the same registration patterns, accepted payment methods, check-out methods, keywords, advertising tactics, similarities in price and quantities, the same incorrect grammar and misspellings, and/or the use of the same text and images. Upon information and belief, e-commerce store operators like Defendants are in constant communication with each other and regularly participate in WeChat group and QQ.com chat rooms and through websites such as sellerdefense.cn, kaidianyao.com, and kuajingvs.com regarding tactics for operating multiple accounts, evading detection, pending litigation, and potential new lawsuits. In addition, the Accused Products share identical or substantively similar infringing components, features, and designs, which logically suggest that the Accused Products were manufactured by and come from a common source and/or that Defendants are interrelated. The identical or substantively similar infringing components of the Accused Products include [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. As such, there exist substantial evidentiary overlap and common questions of fact regarding all Defendants in terms of infringement and any likely counterclaims for noninfringement and/or invalidity of the Asserted Patents.

FACTUAL BACKGROUND

A. Jisu Overview

10. Founded in 2016, Jisu is a global industry leader of portable electronic gadgets,

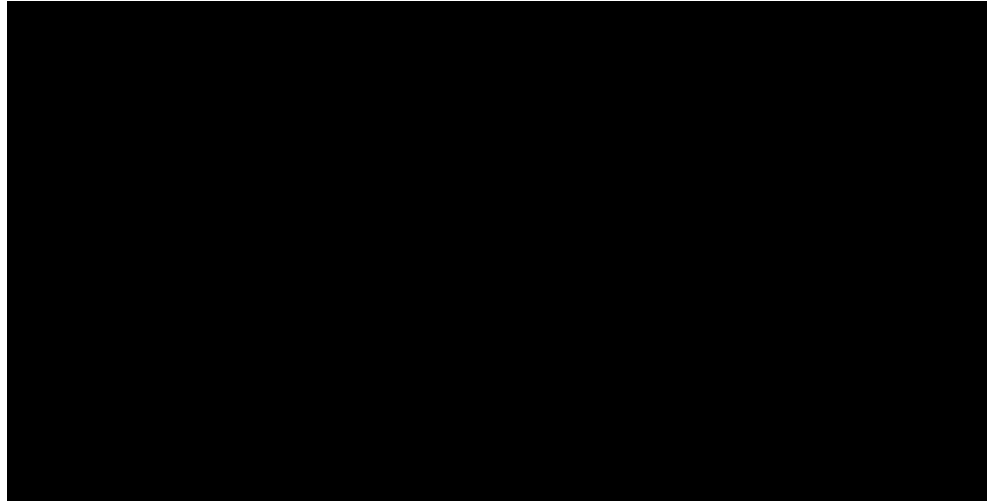
[REDACTED]. Jisu designs, develops, markets, and sells [REDACTED] under the

brand [REDACTED] to consumers in the United States and around the world through online e-commerce platforms and more than 6,000 offline stores.

11. In recent years, people are increasingly pursuing a more convenient life. In order to meet needs of [REDACTED], there have been various [REDACTED] emerging on the market, such as [REDACTED].

12. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

13. In response to the market needs, Jisu has devoted substantial time, effort, and resources to the technical innovation and design iteration for [REDACTED] and related patents. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



(Source: [redacted])

14. [redacted]

[redacted]

[redacted]

[redacted]

15. As a result, [redacted] have achieved commercial success and broad user adoption in the market due to its unmatched technical innovation. Over the past 7 years, Jisu has gained over 20 million customers globally by leading in [redacted] retail sales on [redacted]. The total shipments from 2016 to 2023 have hit more than 30 million units.

16. In addition, Jisu has a large patent portfolio covering its innovative technologies related to [redacted]. For example, each of Jisu's Asserted Patents is related to its innovations for [redacted].

B. The Asserted Patents

17. On [redacted], the United States Patent and Trademark Office ("USPTO") duly and legally issued [redacted]

[REDACTED]

[REDACTED]. A true and correct copy of [REDACTED] is attached hereto as

Exhibit A-1.

18. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

19. On [REDACTED], the USPTO duly and legally issued [REDACTED]

[REDACTED]

[REDACTED] A true and

correct copy of [REDACTED] is attached hereto as Exhibit A-2.

20. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

21. On [REDACTED], the USPTO duly and legally issued [REDACTED]

[REDACTED]. A true and correct copy of [REDACTED]

[REDACTED] is attached hereto as Exhibit A-3.

22. [REDACTED]

[REDACTED]

[REDACTED]

23. All the Asserted Patents are valid and enforceable.

24. The Asserted Patents provide

[REDACTED]

[REDACTED]

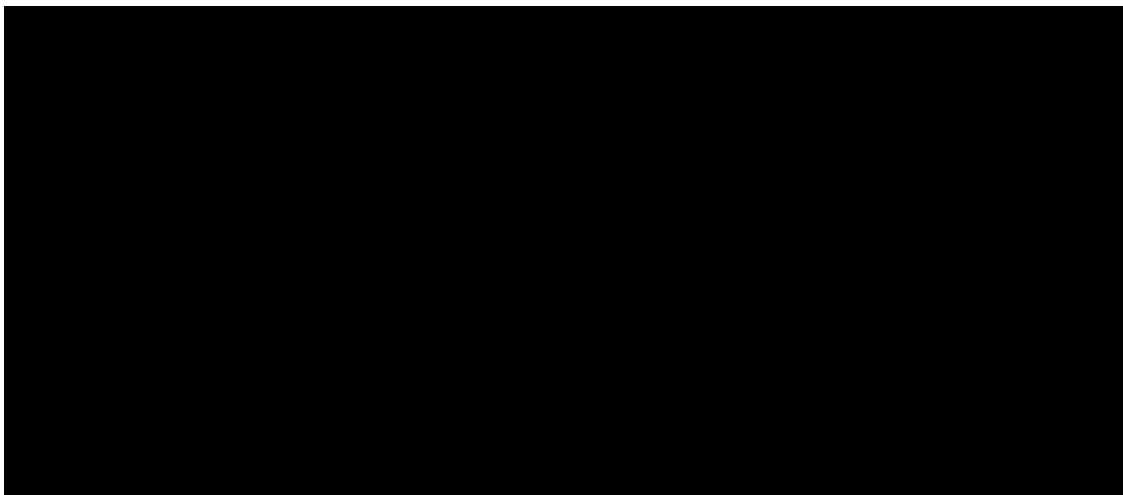


Exhibit A-1 at Figs. 2 and 5

25. As the current assignee of the Asserted Patents, Jisu owns all rights, titles, and interests in the Asserted Patents with full and exclusive right to bring suit to enforce the Asserted Patents.

26. Jisu has practiced the Asserted Patents in connection with the sale and importation into the United States of its [REDACTED].

27. Jisu has marked its [REDACTED] as embodying the claims of the Asserted Patents, for example, by at least virtually marking pursuant to 35 U.S.C. § 287(a) at the product pages of Jisu's e-commerce store on [REDACTED].

28. Jisu has never assigned or licensed the Asserted Patents to any of the Defendants in this matter.

C. Defendants' Unlawful Conduct

29. Jisu's groundbreaking [REDACTED] have resulted in substantial infringement upon the Asserted Patents. Recently, Jisu has identified a large number of interactive online stores, including those operated under the Seller Aliases offering the Accused Products on the e-commerce platforms such as [REDACTED].

30. Upon information and belief, Defendants are individuals and business entities who reside in the People’s Republic of China or other foreign jurisdictions. Defendants operate fully interactive online stores at least on the most popular online shopping platforms in the United States, [REDACTED], under the Seller Aliases. They have targeted the consumers in the United States.

31. For example, as shown in the below images, one of the Defendants operates an e-commerce store on [REDACTED] with the seller aliases “[REDACTED]” and offers infringing [REDACTED] to the consumers in the United States. True and correct copies showing Defendants operating e-commerce stores under the Seller Aliases and targeting consumers in the United States are attached as Exhibit B-1.

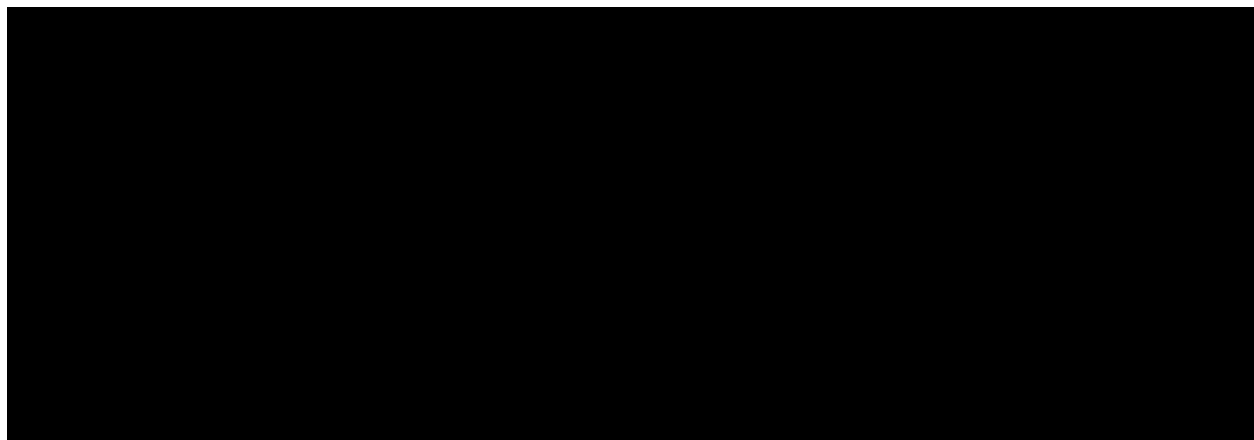


Exhibit B-1 at p. 1 (annotations added)

32. For another example, as shown in the below images, one of the Defendants operates an e-commerce store on [REDACTED] with the seller aliases “[REDACTED]” and offers infringing [REDACTED] to the consumers in the United States. True and correct copies showing Defendants operating e-commerce stores under the Seller Aliases and targeting consumers in the United States are attached as Exhibit B-5.

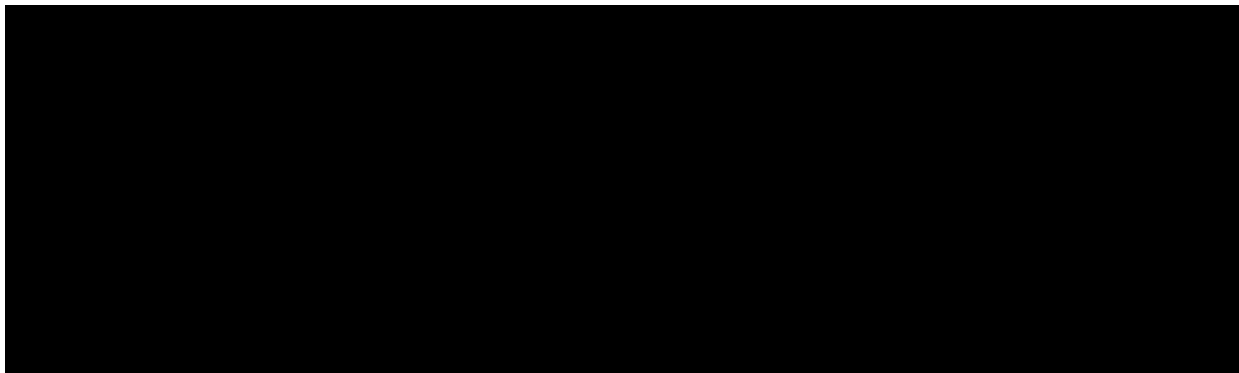


Exhibit B-5 at p. 1 (annotations added)

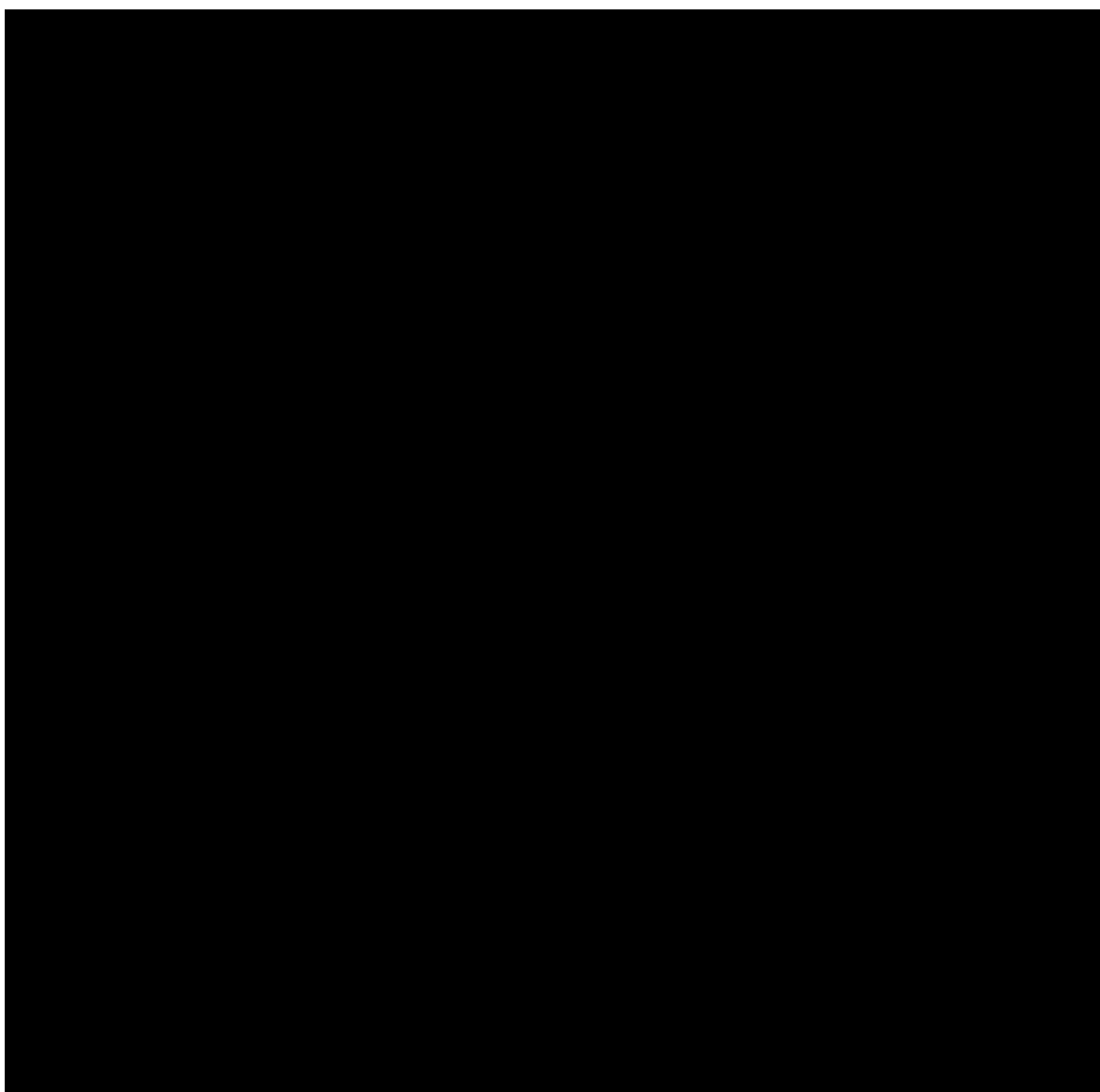


Exhibit B-5 at p. 14 (annotations added)

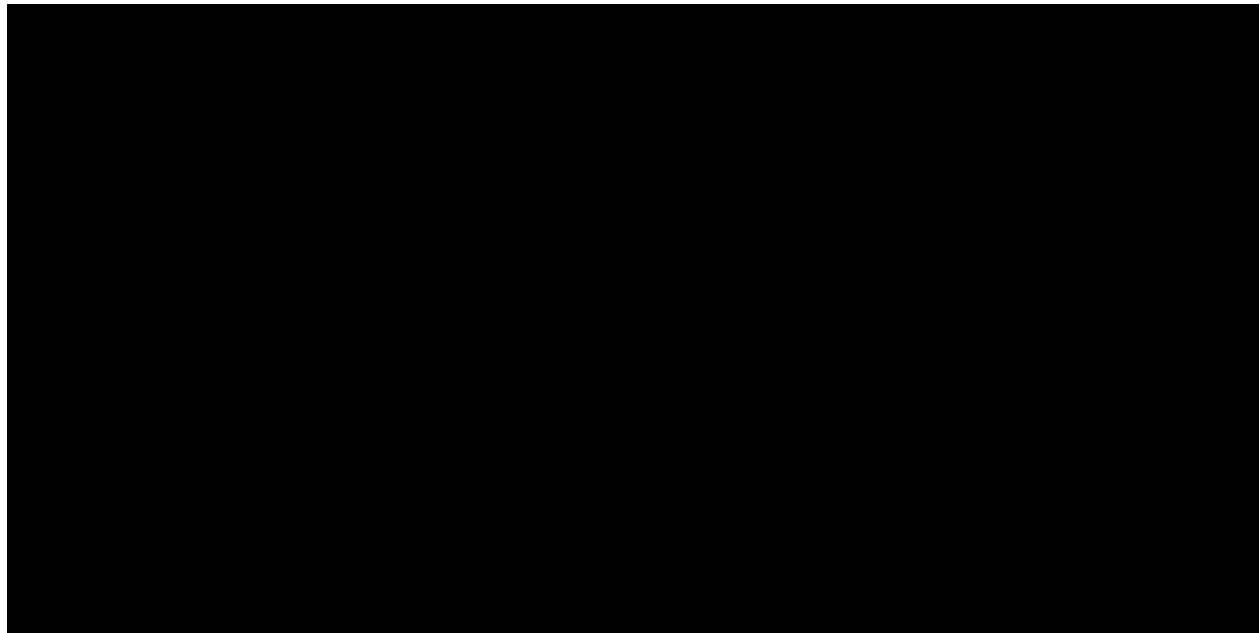
33. In particular, upon information and belief, Defendants offered to sell, sold, imported, and is continuing to sell the Accused Products to the consumers in Illinois and this judicial district.

34. According to the report on “Combating Trafficking in Counterfeit and Pirated Goods” prepared by the U.S. Department of Homeland Security’s Office of Strategy, Policy, and Plans (Jan. 24, 2020), attached as Exhibit D, “[p]latforms generally do not require a seller on a third-party marketplace to identify the underlying business entity.” *See* Exhibit D at p.39. Thus, infringers “routinely use false or inaccurate names and addresses when registering with these e-commerce platforms.” Exhibit E, Daniel C.K. Chow, *Alibaba, Amazon, and Counterfeiting in the Age of the Internet*, 40 NW. J. INT’L L. & BUS. 157, 186 (2020). Further, e-commerce platforms do not link one seller profile to other profiles owned by that same business, or by related businesses and owners. *See* Exhibit D at p.39. “This lack of transparency allows one business to have many different profiles that can appear unrelated.” *Id.* If their original profile is shut down, infringers can quickly and easily move to a new one on the same or different e-commerce platforms. *See id.* at p.22. These tricks make intellectual property holders very difficult to enforce their rights.

35. Upon information and belief, Defendants have employed these deceptive practices when registering and operating their stores at the e-commerce platforms. Upon information and belief, e-commerce store operators like Defendants intentionally furnished inaccurate, misleading, or incomplete details to e-commerce platforms, which effectively concealed their true identities and the full scope of their operation. Upon information and belief, Defendants typically operate under multiple seller aliases and payment accounts so that they can continue operation even if one of their stores or accounts is shut down. E-commerce store operators like Defendants maintain off-

shore bank accounts and regularly move funds from their U.S.-based financial accounts to off-shore accounts outside the jurisdiction of this Court to avoid payment of any monetary judgment.

36. Even though Defendants operate under multiple fictitious aliases, the e-commerce stores operating under the Seller Aliases often share unique identifiers. They use templates with common design elements that intentionally leave out contact details and any information that could reveal the true identities of Defendants. E-commerce stores operating under the Seller Aliases include other notable common features, such as use of the same registration patterns, accepted payment methods, check-out methods, keywords, advertising tactics, similarities in price and quantities, the same incorrect grammar and misspellings, and/or the use of the same text and images. For example, as shown below, despite under different seller aliases, at least the four stores adopt identical design elements including same graphics of the Accused Products. Obviously, their storefront designing is not coincidentally identical but likely duplicated by an interrelated group. *See* Exhibit B-5 at p. 14; Exhibit B-6 at p. 5; Exhibit B-8 at p. 5; and Exhibit B-10 at p. 5.



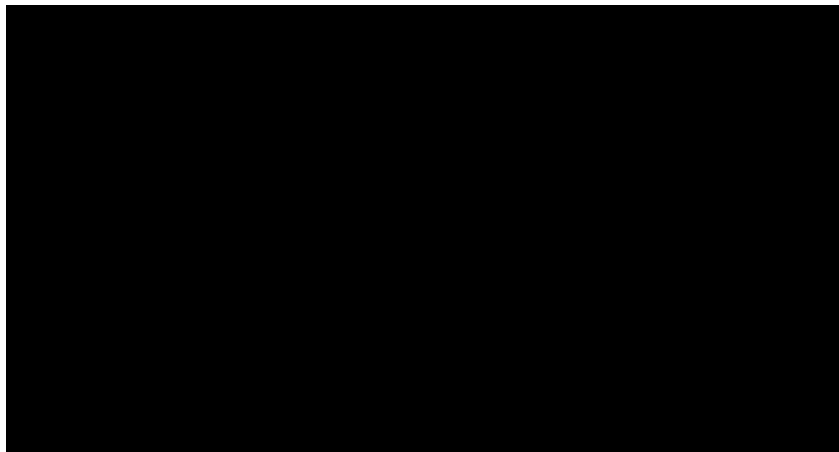
37. Upon information and belief, e-commerce store operators like Defendants are in constant communication with each other and regularly participate in WeChat group and QQ.com chat rooms and through websites such as sellerdefense.cn, kaidianyo.com, and kuajingvs.com regarding tactics for operating multiple accounts and evading detection, pending litigation, and potential new lawsuits.

38. In addition, the Accused Products are all [REDACTED] utilizing identical or substantively similar features and designs. Only minor differences exist between the Accused Products in terms of the shape or color of [REDACTED]. But as far as infringement is concerned, the Accused Products infringe the Asserted Patents in the same or substantially similar manner. The foregoing facts as a whole logically suggest that the Accused Products were manufactured by and come from a common source and/or that Defendants are interrelated. For example, as shown below, despite the nuances in shape and color, [REDACTED] offered by the stores under the Seller Aliases “[REDACTED]” (left) and “[REDACTED]” (right) bear the same technical features, including [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] See Exhibit B-1 at p. 11; Exhibit B-13 at p. 6. The same technical features made both of the two [REDACTED] infringe each of the Asserted Patents. See Exhibits C-1, C-2, and C-3.



39. Upon information and belief, Defendants are working in active concert to knowingly and willfully manufacture, use, import, distribute, offer for sale, and sell the Accused Products in the same transaction, occurrence, or series of transactions or occurrences. Defendants, without any authorization or license from Plaintiff, have jointly and severally, knowingly and willfully infringed Asserted Patents directly in connection with the manufacturing, import, use, distribution, offering for sale, and sale of the Accused Products in or into the United States and this judicial district.

40. Upon information and belief, Defendants have actively induced and continue to induce others such as consumers to use the Accused Products, thereby indirectly infringing one or more claims of each Asserted Patent.

41. Defendants' infringement of the Asserted Patents in connection with the manufacturing, using, offering for sale, selling, and/or importing the Accused Products in or into the United States and this judicial district is irreparably harming Jisu.

**COUNT I:
INFRINGEMENT OF U.S. PATENT NO. [REDACTED]**

42. Jisu hereby realleges and incorporates herein by reference the allegations set forth in the preceding paragraphs.

43. Jisu owns all right, title, and interest in [REDACTED]. Accordingly, Jisu has standing to bring legal action to enforce all rights arising under [REDACTED]. Jisu has practiced [REDACTED] in connection with the sale and importation into the United States of its [REDACTED]. Jisu has marked its [REDACTED] as embodying the claims of [REDACTED], for example, by at least virtually marking pursuant to 35 U.S.C. § 287(a) at the product pages of Jisu's e-commerce store on [REDACTED].

44. Defendants are not licensed to make, use, offer for sale, sell, or import any product or service that is covered by the claims of [REDACTED].

45. Upon information and belief, Defendants are making, using, offering for sale, selling, and/or importing into the United States for subsequent sale or use the Accused Products. As shown in the example claim chart attached as Exhibit C-1, the Accused Products infringe the features and technologies claimed in at least [REDACTED], either literally or under the doctrine of equivalents. The claim chart of Exhibit C-1 is illustrative only. Plaintiff reserves the right to modify its infringement theory as appropriate as the case proceeds. Although the claim chart only includes [REDACTED], Plaintiff alleges that Defendants have infringed each and every claim of [REDACTED].

46. Defendants have actively induced and continue to induce others to directly infringe one or more claims of [REDACTED]. Upon information and belief, Defendants understand, intend, and encourage the consumers to use the Accused Products in the United

States by showcasing various functions and features of the Accused Products and offering shipping in their online stores.

47. Defendants have infringed [REDACTED] through the aforesaid acts and will continue to do so unless enjoined by this Court. Defendants' wrongful conduct has caused Jisu to suffer irreparable harm resulting from the loss of its lawful patent rights to exclude others from making, using, selling, offering for sale, and importing the patented invention, for which there is no adequate remedy at law. Furthermore, the public interest would be served by the issuance of an injunction. Therefore, Jisu is entitled to injunctive relief pursuant to 35 U.S.C. § 283. Unless an injunctive relief is issued enjoining Defendants' wrongful conduct from infringing [REDACTED], Jisu will continue to be irreparably harmed.

48. Defendants' infringement of [REDACTED] has been and will continue to be willful, deliberate, and intentional. Upon information and belief, Defendants have actual knowledge of [REDACTED] and actual knowledge that their activities constitute direct, indirect, or joint infringement of [REDACTED] at least through Jisu's notices and large-scale enforcement operations on e-commerce platforms and in courts. Alternatively, Defendants have willfully blinded themselves to the infringing nature of their activities, and yet continue their infringing activities.

49. As a result of Defendants' infringing activities, Jisu has suffered actual damages in an amount to be determined at trial. Jisu is entitled to recover damages adequate to compensate for Defendants' infringement together with enhanced damages up to three times any amount ordered pursuant to 35 U.S.C. § 284.

50. Jisu is entitled to recover its costs, expenses, and interest, including pre-judgment and post-judgment interest as appropriate pursuant to 35 U.S.C. § 284.

51. Jisu is entitled to recover reasonable attorney fees as appropriate pursuant to 35 U.S.C. § 285.

**COUNT II:
INFRINGEMENT OF U.S. PATENT NO. [REDACTED]**

52. Jisu hereby realleges and incorporates herein by reference the allegations set forth in the preceding paragraphs.

53. Jisu owns all right, title, and interest in [REDACTED]. Accordingly, Jisu has standing to bring legal action to enforce all rights arising under [REDACTED]. Jisu has practiced [REDACTED] in connection with the sale and importation into the United States of its [REDACTED]. Jisu has marked its [REDACTED] as embodying the claims of [REDACTED], for example, by at least virtually marking pursuant to 35 U.S.C. § 287(a) at the product pages of Jisu's e-commerce store on [REDACTED].

54. Defendants are not licensed to make, use, offer for sale, sell, or import any product or service that is covered by the claims of [REDACTED].

55. Upon information and belief, Defendants are making, using, offering for sale, selling, and/or importing into the United States for subsequent sale or use the Accused Products. As shown in the example claim chart attached as Exhibit C-2, the Accused Products infringe the features and technologies claimed in at least [REDACTED], either literally or under the doctrine of equivalents. The claim chart of Exhibit C-2 is illustrative only. Plaintiff reserves the right to modify its infringement theory as appropriate as the case proceeds. Although the claim chart only includes [REDACTED], Plaintiff alleges that Defendants have infringed each and every claim of [REDACTED].

56. Defendants have actively induced and continue to induce others to directly infringe one or more claims of [REDACTED]. Upon information and belief, Defendants

understand, intend, and encourage the consumers to use the Accused Products in the United States by showcasing various functions and features of the Accused Products and offering shipping in their online stores.

57. Defendants have infringed [REDACTED] through the aforesaid acts and will continue to do so unless enjoined by this Court. Defendants' wrongful conduct has caused Jisu to suffer irreparable harm resulting from the loss of its lawful patent rights to exclude others from making, using, selling, offering for sale, and importing the patented invention, for which there is no adequate remedy at law. Furthermore, the public interest would be served by the issuance of an injunction. Therefore, Jisu is entitled to injunctive relief pursuant to 35 U.S.C. § 283. Unless an injunctive relief is issued enjoining Defendants' wrongful conduct from infringing [REDACTED], Jisu will continue to be irreparably harmed.

58. Defendants' infringement of [REDACTED] has been and will continue to be willful, deliberate, and intentional. Upon information and belief, Defendants have actual knowledge of [REDACTED] and actual knowledge that their activities constitute direct, indirect, or joint infringement of [REDACTED] at least through Jisu's notices and large-scale enforcement operations on e-commerce platforms and in courts. Alternatively, Defendants have willfully blinded themselves to the infringing nature of their activities, and yet continue their infringing activities.

59. As a result of Defendants' infringing activities, Jisu has suffered actual damages in an amount to be determined at trial. Jisu is entitled to recover damages adequate to compensate for Defendants' infringement together with enhanced damages up to three times any amount ordered pursuant to 35 U.S.C. § 284.

60. Jisu is entitled to recover its costs, expenses, and interest, including pre-judgment and post-judgment interest as appropriate pursuant to 35 U.S.C. § 284.

61. Jisu is entitled to recover reasonable attorney fees as appropriate pursuant to 35 U.S.C. § 285.

**COUNT III:
INFRINGEMENT OF U.S. PATENT NO. [REDACTED]**

62. Jisu hereby realleges and incorporates herein by reference the allegations set forth in the preceding paragraphs.

63. Jisu owns all right, title, and interest in [REDACTED]. Accordingly, Jisu has standing to bring legal action to enforce all rights arising under [REDACTED]. Jisu has practiced [REDACTED] in connection with the sale and importation into the United States of its [REDACTED]. Jisu has marked its [REDACTED] as embodying the claims of [REDACTED], for example, by at least virtually marking pursuant to 35 U.S.C. § 287(a) at the product pages of Jisu's e-commerce store on [REDACTED].

64. Defendants are not licensed to make, use, offer for sale, sell, or import any product or service that is covered by the claims of [REDACTED].

65. Upon information and belief, Defendants are making, using, offering for sale, selling, and/or importing into the United States for subsequent sale or use the Accused Products. As shown in the example claim chart attached as Exhibit C-3, the Accused Products infringe the features and technologies claimed in at least [REDACTED], either literally or under the doctrine of equivalents. The claim chart of Exhibit C-3 is illustrative only. Plaintiff reserves the right to modify its infringement theory as appropriate as the case proceeds. Although the claim chart only includes [REDACTED], Plaintiff alleges that Defendants have infringed each and every claim of [REDACTED].

66. Defendants have actively induced and continue to induce others to directly infringe one or more claims of [REDACTED]. Upon information and belief, Defendants understand, intend, and encourage the consumers to use the Accused Products in the United States by showcasing various functions and features of the Accused Products infringing at least [REDACTED] and offering shipping in their online stores.

67. Defendants have infringed [REDACTED] through the aforesaid acts and will continue to do so unless enjoined by this Court. Defendants' wrongful conduct has caused Jisu to suffer irreparable harm resulting from the loss of its lawful patent rights to exclude others from making, using, selling, offering for sale, and importing the patented invention, for which there is no adequate remedy at law. Furthermore, the public interest would be served by the issuance of an injunction. Therefore, Jisu is entitled to injunctive relief pursuant to 35 U.S.C. § 283. Unless an injunctive relief is issued enjoining Defendants' wrongful conduct from infringing [REDACTED], Jisu will continue to be irreparably harmed.

68. Defendants' infringement of [REDACTED] has been and will continue to be willful, deliberate, and intentional. Upon information and belief, Defendants have actual knowledge of [REDACTED] and actual knowledge that their activities constitute direct, indirect, or joint infringement of [REDACTED] at least through Jisu's notices and large-scale enforcement operations on e-commerce platforms and in courts. Alternatively, Defendants have willfully blinded themselves to the infringing nature of their activities, and yet continue their infringing activities.

69. As a result of Defendants' infringing activities, Jisu has suffered actual damages in an amount to be determined at trial. Jisu is entitled to recover damages adequate to

compensate for Defendants' infringement together with enhanced damages up to three times any amount ordered pursuant to 35 U.S.C. § 284.

70. Jisu is entitled to recover its costs, expenses, and interest, including pre-judgment and post-judgment interest as appropriate pursuant to 35 U.S.C. § 284.

71. Jisu is entitled to recover reasonable attorney fees as appropriate pursuant to 35 U.S.C. § 285.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgement against Defendants as follows:

- 1) A judgment and order adjudicating and declaring that Defendants have infringed each of the Asserted Patents;
- 2) A judgment and order temporarily, preliminarily, and permanently enjoining Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with them from:
 - a) making, using, offering for sale, selling, and/or importing into the United States for subsequent sale or use any products that infringe upon any of the Asserted Patents;
 - b) aiding, abetting, contributing to, or otherwise assisting anyone in infringing upon any of the Asserted Patents; and
 - c) effecting assignments or transfers, forming new entities or associations or utilizing any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth in Subparagraphs (a) and (b).

- 3) Entry of an Order that, upon Jisu's request, those with notice of the injunction, including, without limitation, any online marketplace platforms such as [REDACTED], shall disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of goods that infringe any of the Asserted Patents;
- 4) A judgment and order declaring that Defendants have willfully infringed the Asserted Patents;
- 5) A judgment and order awarding Jisu damages adequate to compensate for Defendants' infringement together with enhanced damages up to three times any amount ordered pursuant to 35 U.S.C. § 284;
- 6) A judgment and order awarding Jisu its costs, expenses, and interest, including pre-judgment and post-judgment interest, as provided for by 35 U.S.C. § 284;
- 7) A determination that this is an exceptional case under 35 U.S.C. § 285;
- 8) A judgment and order awarding Jisu its reasonable attorneys' fees; and
- 9) Awarding any and all other relief that this Court deems just and proper.

DEMAND FOR JURY TRIAL

Jisu hereby demands a jury trial on all issues appropriately triable by a jury.

Dated: May 20, 2024

Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Jason C. White
Jason C. White (Illinois Bar No. 6238352)
110 North Wacker Drive
Chicago, IL 60606-1511
Telephone: (312) 324-1000
Facsimile: (312) 324-1001
jason.white@morganlewis.com

Shaobin Zhu (*pro hac vice* to be filed)
1400 Page Mill Road
Palo Alto, CA 94304
Tel: 650.843.4000
Fax: 650.843.4001
Email: shaobin.zhu@morganlewis.com

Jensen (Jian) Xu (*pro hac vice* to be filed)
Units 2802-2810 Tower A, Three ITC
No. 183 Hongqiao Road
Shanghai 200030, China
Tel: +86.21.8022.8588
Fax: +86.21.8022.8599
Email: Jensen.xu@morganlewis.com

Attorneys for Plaintiff Shenzhen Jisu Technology Co., Ltd.