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Patricia Ray (Pa Bar No 31989)
RAYCHAN I.P. LAW FIRM, PLLC
5 Old Mill Road Freeport PA 16229
Telephone: (215) 908-6810
Email: raypatricia@yahoo.com

Attorney for Plaintiff
Homy Casa Limited

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

Homy Casa Limited, a corporation of Hong
Kong

Plaintiff,

v.

Jili Creation Technology Co., Ltd., a corporation
of China

Defendant.

Case No.

**(1) COMPLAINT FOR
PATENT INFRINGEMENT
[35 U.S.C. § 271 et seq.]**

(2) DEMAND FOR JURY TRIAL

For its Complaint against Defendant Jili Creation Technology Co., Ltd. (“Defendant”), Plaintiff
Homy Casa Limited (collectively “Plaintiff”) states the following:

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I.

THE PARTIES

1. Plaintiff Homy Casa Limited is a Hong Kong corporation with a principal place of business at Room 1905 Nam Wo Hong Building, 148 Wing Lok Street, Sheung Wan, Hong Kong.

2. Plaintiff is informed and believes, and thereupon alleges, that Defendant is a foreign based company that has copied Plaintiff's proprietary patent-protected and sells those products online on Wayfair.com without regard for the intellectual property rights of others, and who may be characterized as infringers and counterfeiters because of their disregard for the owner's rights and/or for the damage they cause to legitimate businesses. Sometimes the one Defendant conducts business in concert or connection with other Defendants.

3. Upon information and belief, Defendant has substantial contacts and transacts substantial business, either directly or through agents, on an ongoing basis in this judicial district and elsewhere in the United States.

4. Unless specifically stated otherwise, the acts complained of herein were committed by, on behalf of, and/or for the benefit of Defendant.

II.

NATURE OF THE ACTION

5. This is an action for patent infringement.

6. Plaintiff is informed and believes, and thereupon alleges, that Defendant has been infringing, contributing to the infringement of, and/or actively inducing others to infringe claims of U.S. Patent Nos. D808,669S ("the '669 Patent"), D920,703 ('703 Patent"), D936,991S ("the '991 Patent"), and D936,992S ("the '992 Patent").

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III.

JURISDICTION AND VENUE

7. This action arises under the patent laws of the United States, 35 U.S.C. § 271 *et seq.* This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

8. This Court has personal jurisdiction over Defendant because it has substantial contacts and conducts substantial business in the state of Pennsylvania, in this judicial district and have been infringing, contributing to the infringement of, and/or actively inducing others to infringe the '669 Patent, the '703 Patent, the '991 Patent, and the '992 Patent in this District and elsewhere. This Court may exercise personal jurisdiction over a non-resident of the state where the court sits to the extent authorized by state law. Fed R. Civ. Pro. 4e. Pennsylvania authorized personal jurisdiction over each Defendant pursuant to 42 Pa. Const. Statutes Section 5322(a) which provides: "A tribunal of this Commonwealth may exercise personal jurisdiction over a person...who acts...as to a cause of action...(1) Transacting any business in this Commonwealth." In the alternative, Fed R. Civ. Pro Rule 4(k) confers personal jurisdiction over the Defendant because, on information and belief they regularly conduct, transact and/or solicit business in Pennsylvania and in this judicial district and/or derive substantial revenue from their business transactions in Pennsylvania and in this judicial district and or otherwise avail themselves of the privileges and protections of the laws of Pennsylvania such that this Courts assertion of jurisdiction over Defendant does not offend traditional notions of fair play and due process and/or Defendant infringing actions in Pennsylvania caused injury to Plaintiff in Pennsylvania and this judicial district such that Defendant should reasonably contemplate such actions to have consequences in Pennsylvania and this judicial district, for example:

- (a) On information and belief, Defendant has directed or targeted infringing activities toward consumers in the United States, including Pennsylvania through online

1 platforms and websites, including Wayfair.com and eBay.com under seller IDs held
2 by or associated with Defendant. These marketplace websites through which
3 consumers in the United States, including Pennsylvania, can view the marketplace
4 websites through which Defendant offer infringing products online and through which
5 consumers can place orders for delivery of infringing products and Defendant can
6 transact the illegal business.
7

8 (b) Defendant accepts payment for infringing products in U.S. dollars and offers delivery
9 of the illegal sales in the United States, including Pennsylvania.

10 (c) Defendant is currently and continuously targeting illegal sales of infringing products
11 toward consumers and causing harm in Allegheny County, Pennsylvania.

12 (d) Defendant is causing an illegal stream of infringing products to enter the United
13 States, including this judicial district.

14 (e) Plaintiff is suffering irreparable harm and substantial damages due to Defendant's
15 wrongful sale of infringing goods in this judicial district.

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17 9. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391 (a) (b) and (c) and /or 1400
18 (b) because

19 (a) a substantial part of the events giving rise to Plaintiff's claims occurred in
20 the Western District of Pennsylvania and because Defendant is subject to
21 personal jurisdiction in the Western District of Pennsylvania.

22 (b) Defendant is known to transact business in this judicial district, and

23 (c) a Defendant not resident in the United States may be sued in this judicial
24 district because personal jurisdiction is proper in this district.
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FACUAL BACKGROUND

(U.S. Design Patent Nos. D808,669S, D920,703S, D936,991S, and D936,992S)

10. Plaintiff re-alleges and incorporates by reference Paragraphs 1 – 10 of its Complaint.

11. On January 30, 2018, the '669 Patent titled "CHAIR" was duly and legally issued to Homy Casa Limited. The '669 Patent has remained in force since that time and continues to be in force. A true and correct copy of the '669 Patent is attached as Exhibit "1" and incorporated herein by reference.

12. On June 1, 2021, the '703 Patent titled "CHAIR" was duly and legally issued to Homy Casa Limited. The '703 Patent has remained in force since that time and continues to be in force. A true and correct copy of the '703 Patent is attached as Exhibit "2" and incorporated herein by reference..

13. On November 30, 2021, the '991 Patent titled "CHAIR" was duly and legally issued to Homy Casa Limited. The '991 Patent has remained in force since that time and continues to be in force. A true and correct copy of the '991 Patent is attached as Exhibit "3" and incorporated herein by reference.

14. On November 30, 2021, the '992 Patent titled "CHAIR" was duly and legally issued to Homy Casa Limited. The '992 Patent has remained in force since that time and continues to be in force. A true and correct copy of the '992 Patent is attached as Exhibit "4" and incorporated herein by reference.

15. The '669 Patent, '703 Patent, '991 Patent and '992 Patent are all the result of substantial research into a unique design and commitment of innovative efforts and resources by the inventor Yuehai Li.

16. At all relevant times, the rights in the '669 Patent, '703 Patent, '991 Patent, and '992

1 Patent have been owned by Applicant and assignee Homy Casa Limited, who are the Plaintiff.

2 17. The '669 Patent, '703 Patent, '991 Patent, and '992 Patent each covers ornamental
3 design for a chair. Plaintiff has been commercially and successfully with its distinctive chair design
4 providing differentiation to other competitors' chair designs.

5 18. As a result of Plaintiff's substantial advertising and promotional efforts, as well as the
6 high quality of the chair products associated with the design of the '669 Patent, '703 Patent, '991
7 Patent, and '992 Patent, such distinctive chair designs have earned valuable and residual goodwill and
8 reputation for Plaintiff being the sole source for such chair goods in the United States.

9 19. Plaintiff is informed and believes that the Defendant operates an online store on
10 Wayfair.com where it advertises and sells its products using the brand name Tapscott and Mercury
11 Row.

12 20. Plaintiff is informed and believes that Defendant may offer and provide products
13 between each other which products infringe the '669 Patent, '703 Patent, '991 Patent, and '992 Patent
14 to the market under various names.

15 21. Defendant sells the products under the ordinary observer test. Under this test, an
16 accused design infringes upon a patented design if, in the eye of an ordinary observer, giving such
17 attention as a purchaser usually gives, two designs are substantially the same in that the resemblance is
18 such as to deceive such an observer, inducing him to purchase one supposing it to be the other.

19 22. A side-by-side comparison of the '669 Patent, '703 Patent, '991 Patent, and '992
20 Patent and the infringing products that are sold by Defendant are shown below in the Claim Charts
21 accompanying this Complaint as Exhibit 5, Exhibit 6, Exhibit 7, and Exhibit 8 respectively.

22 23. Plaintiff has not granted a license or any other authorization to Defendant to make use,
23 offer for sale, sell or import chairs that embody the design patented in the '669 Patent, '703 Patent,
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1 '991 Patent, and '992 Patent and which are proprietary to Plaintiff.

2 24. Plaintiff has sent a cease-and-desist request to the Defendant, informing about the
3 infringement. Despite the request to cease-and-desist, Defendant continues to sell, offer to sell and/or
4 promote the infringing products on online platforms at least on Wayfair.
5

6 25. Not only has Defendant denied selling the infringing products, but also refuses to
7 provide information on past infringing activities.

8 26. Defendant has not discouraged consumers from purchasing infringing products,
9 despite knowing of Plaintiff's rights.

10 27. Defendant has been willfully and knowingly infringing Plaintiff's rights, including as
11 to the '669 Patent, '703 Patent, '991 Patent, and '992 Patent, causing Plaintiff to suffer from
12 substantial losses and damages.
13

14 28. Defendant's wrongful conduct and infringing and damaging activities will continue
15 unless enjoined by this Court.
16

17 **FIRST CAUSE OF ACTION**

18 **(Infringement of U.S. Design Patent No. D808,669S, D920,703S, D936,991S, and D936,992S**

19 **Under 35 U.S.C. § 271 et seq.)**
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21 29. Plaintiff incorporates by reference and reallege paragraphs 1 through 28 above as
22 though fully restated here.

23 30. Plaintiff provided actual notice to Defendant of its infringement including informing
24 Defendant of the infringement and asking that Defendant cease and desist and also through the filing
25 of this complaint.

26 31. Defendant has engaged in a pattern of conduct demonstrating: Defendant's awareness
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1 of the '669 Patent, '703 Patent, '991 Patent, and '992 Patent; the objectively high likelihood that
2 Defendant' actions constitute infringement of the '669 Patent, '703 Patent, '991 Patent, and '992
3 Patent and that the '669 Patent, '703 Patent, '991 Patent, and '992 Patent are valid and enforceable;
4 and that this objectively-defined risk was so obvious that Defendant knew or should have known it.
5

6 32. Plaintiff is informed and believes, and thereupon alleges, that Defendant has infringed
7 and continues to infringe the '669 Patent, '703 Patent, '991 Patent, and '992 Patent by, *inter alia*,
8 making, using, offering to sell, or selling in the United States, including in the State of Pennsylvania
9 and within this judicial district, products infringing the ornamental design covered by the '669 Patent,
10 '703 Patent, '991 Patent, and '992 Patent in violation of 35 U.S.C. § 271, including but not limited to
11 the infringing products.
12

13 33. Defendant infringe the '669 Patent, '703 Patent, '991 Patent, and '992 Patent because,
14 *inter alia*, in the eye of an ordinary observer, giving such attention as a purchaser usually gives, the
15 design of the '669 Patent, '703 Patent, '991 Patent, and '992 Patent and the chair design of
16 Defendant's products including are substantially the same, the resemblance being such as to deceive
17 such an ordinary observer, inducing him to purchase one supposing it to be the other.
18

19 34. Defendant's acts of infringement of the '669 Patent, '703 Patent, '991 Patent, and '992
20 Patent were undertaken without authority, permission or license from Plaintiff. Defendant' infringing
21 activities violate 35 U.S.C. § 271.
22

23 35. Defendant's infringement has damaged and continues to damage the injure Plaintiff.
24 The injury to Plaintiff is irreparable and will continue unless and until Defendant is enjoined from
25 further infringement.
26

27 36. Plaintiff is entitled to a complete accounting of all relevant and profits derived by
28 Defendant from the unlawful conduct alleged herein, including without limitation, Defendant's total

1 profit pursuant to 35 U.S.C. § 289.

2 37. Defendant has engaged and is engaged in willful and deliberate infringement of the
3 ‘669 Patent, ‘703 Patent, ‘991 Patent, and ‘992 Patent. Such willful and deliberate infringement
4 justifies an increase of three times the damages to be assessed pursuant to 35 U.S.C. § 284 and further
5 qualifies this action as an exceptional case supporting an award of reasonable attorney’s fees pursuant
6 to 35 U.S.C. § 285.

7 38. Plaintiff is entitled to a permanent injunction preventing Defendant from further
8 infringing the ‘669 Patent, ‘703 Patent, ‘991 Patent, and ‘992 Patent.

9
10 **PRAY FOR RELIEF**

11 **WHEREFORE**, Plaintiff asks this Court to enter judgment in its favor against Defendant and
12 grant the following relief:

13 A. An adjudication that Defendant has infringed and continues to infringe, directly and
14 indirectly through contributory and/or induced infringement, the ‘669 Patent, ‘703 Patent, ‘991 Patent,
15 and ‘992 Patent as alleged above.

16 B. An accounting of all damages sustained by Plaintiff as a result of Defendant’s acts of
17 infringement of the ‘669 Patent, ‘703 Patent, ‘991 Patent, and ‘992 Patent pursuant to 35 U.S.C. § 283.

18 C. An award to Plaintiff of actual damages adequate to compensate Plaintiff for
19 Defendant’s acts of infringement, together with pre-judgment and post-judgment interest.

20 D. An award to Plaintiff of enhanced damages, up to and including the trebling of Plaintiff’s
21 damages pursuant to 35 U.S.C. § 284 for Defendant’s willful infringement of the ‘669 Patent, ‘703
22 Patent, ‘991 Patent, and ‘992 Patent.

23 E. An award for Plaintiff’s cost of suit and reasonable attorneys’ fees pursuant to 35 U.S.C.
24 § 285 due to the exceptional nature of this case; or as otherwise permitted by law.

1 F. A grant of a temporary restraining order, preliminary and permanent injunction pursuant
2 to 35 U.S.C. § 283, enjoining Defendant and its agents, servants employees, principals, officers,
3 attorneys, successors, assignees and all those in active concert with Defendant, including related
4 individuals and entities, customers, representatives, OEM's, dealers and distributors, from further acts
5 of (1) infringement, (2) contributory infringement, and (3) active inducement to infringe with respect to
6 the claims of the '669 Patent, '703 Patent, '991 Patent, and '992 Patent, and;
7

8 G. Entry of an Order that, on Plaintiff's request any financial institutions, payment
9 processors, billing agents, banks, escrow services, money transmitters or marketplace platforms and
10 their related companies and affiliates, identify and restrain all funds in all financial accounts in
11 connection with the Defendant and/or their seller ID's or ecommerce names or other identifiers used by
12 Defendant now or in the future or any other account used in connection with funds processed from the
13 sale of the infringing products, to be used in partial satisfaction of the judgement entered in this case.
14

15 H. Any further relief that this Court deems just and proper.
16

17 Dated: May 23, 2024

RAYCHAN I.P. LAW FIRM, PLLC

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20 /s/ Patricia Ray

21 Attorney for Plaintiff
22 Homy Casa Limited
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DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury trial on all issues triable as of right to a jury. FED. R. CIV. P.
38(b).

Dated: May 23, 2024

RAYCHAN I.P. LAW FIRM, PLLC

/s/ Patricia Ray

Patricia Ray

Attorney for Plaintiff
Homy Casa Limited

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EXHIBIT 1



(12) **United States Design Patent** (10) **Patent No.:** **US D808,669 S**
Li (45) **Date of Patent:** **** Jan. 30, 2018**

(54) **CHAIR** D549,018 S * 8/2007 Glass D6/375
 D566,979 S * 4/2008 Cox D6/375
 D608,549 S * 1/2010 Novak D6/334
 D670,099 S * 11/2012 Olivares D6/375
 D729,538 S * 5/2015 Kotilainen D6/375
 D742,153 S * 11/2015 Hui D6/375
 D770,794 S * 11/2016 Hayon D6/375
 D778,657 S * 2/2017 Morrison D6/373
 D796,883 S * 9/2017 Mehalley D6/375

(**) Term: **15 Years**

* cited by examiner

(21) Appl. No.: **29/592,019**

Primary Examiner — Abraham Bahta

(22) Filed: **Jan. 25, 2017**

(57) **CLAIM**

The ornamental design for a chair, as shown and described.

(51) **LOC (11) Cl.** **06-01**

DESCRIPTION

(52) **U.S. Cl.**

USPC **D6/334**

(58) **Field of Classification Search**

USPC D6/334-336, 366, 371, 372, 373, 374,
 D6/375, 376, 716, 716.1, 716.4

CPC A47C 3/04; A47C 3/12; A47C 4/02; A47C
 4/03; A47C 5/12; A47C 7/16

See application file for complete search history.

FIG. 1 is a front elevational view of a chair showing my new design;

FIG. 2 is a rear elevational view thereof;

FIG. 3 is a left side view thereof;

FIG. 4 is a right side view thereof;

FIG. 5 is a top plan view thereof;

FIG. 6 is a bottom plan view thereof;

FIG. 7 is a first perspective view thereof; and,

FIG. 8 is a second perspective view thereof.

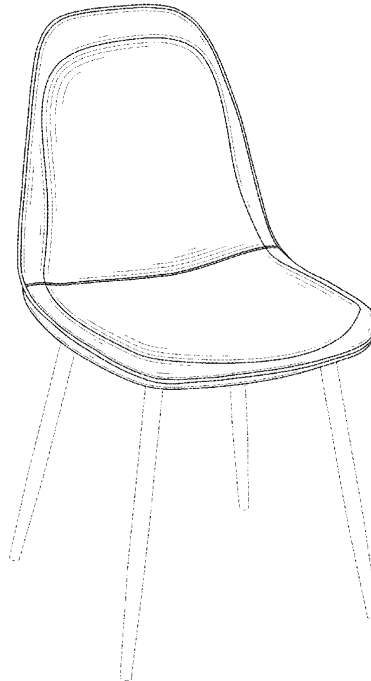
The broken lines in the drawings illustrate portions of the chair which form no part of the claimed design.

(56) **References Cited**

U.S. PATENT DOCUMENTS

D192,029 S * 1/1962 Avedon 297/452.14
 D471,729 S * 3/2003 Glass D6/375

1 Claim, 8 Drawing Sheets



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(12) **United States Design Patent** (10) **Patent No.:** **US D920,703 S**
Li (45) **Date of Patent:** **** *Jun. 1, 2021**

(54) **CHAIR** 2,980,454 A * 4/1961 Thaden A47C 1/124
 403/169
 (71) Applicant: **Homy Casa Limited**, Hong Kong (HK) 3,261,640 A * 7/1966 Straits A47C 15/002
 297/135
 (72) Inventor: **YueHai Li**, Guangzhou (CN) 3,393,941 A * 7/1968 Grosfillex A47C 7/02
 297/440.22
 (73) Assignee: **HOMY CASA LIMITED**, Hong Kong
 (HK) D544,230 S * 6/2007 Glass D6/375
 D546,087 S * 7/2007 Rashid D6/375
 D592,873 S * 5/2009 Olano Jauregui D6/373
 D608,549 S * 1/2010 Novak D6/334
 D609,489 S * 2/2010 Adams D6/375
 D666,015 S * 8/2012 Morrison D6/360
 D690,147 S * 9/2013 Meyer D6/375
 D719,365 S * 12/2014 Adams D6/360
 D748,927 S * 2/2016 Feichtner D6/375
 D772,594 S * 11/2016 Fukasawa D6/375
 D778,657 S * 2/2017 Morrison D6/373
 D798,069 S * 9/2017 Iqbal D6/334
 D798,070 S * 9/2017 Iqbal D6/334

(*) Notice: This patent is subject to a terminal disclaimer.
 (**) Term: **15 Years**

(21) Appl. No.: **29/671,555**

(22) Filed: **Nov. 28, 2018**

(51) **LOC (13) Cl.** **06-01**

(52) **U.S. Cl.** **D6/375**

(58) **Field of Classification Search**

USPC D6/334, 336, 344, 345, 348, 349, 350, D6/352, 353, 355, 358, 360, 364, 368, D6/369, 370, 371, 373, 375, 379, 380, D6/381, 677, 692.3, 708, 708.16, 716, D6/717; D11/184; D21/521; D23/292
 CPC .. A47C 1/12; A47C 1/124; A47C 3/00; A47C 3/04; A47C 3/12; A47C 3/14; A47C 3/16; A47C 3/18; A47C 3/20; A47C 3/34; A47C 4/02; A47C 4/03; A47C 4/38; A47C 4/10; A47C 4/24; A47C 4/045; A47C 4/286; A47C 5/06; A47C 5/04; A47C 5/12; A47C 5/043; A47C 7/00; A47C 7/16; A47C 7/002; A47C 7/445; A47C 7/448; A47C 7/506; A47C 7/52; A47C 7/50; A47C 9/00; A47C 9/007; A47D 1/00; A01M 31/02; Y10S 297/02
 See application file for complete search history.

(56) **References Cited**

U.S. PATENT DOCUMENTS

D182,790 S * 5/1958 Cohen D6/375
 2,893,469 A * 7/1959 Eames A47C 5/12
 297/239

(Continued)
 Primary Examiner — Kevin K Rudzinski
 Assistant Examiner — Paul D Bohannon
 (74) *Attorney, Agent, or Firm* — Hauptman Ham, LLP

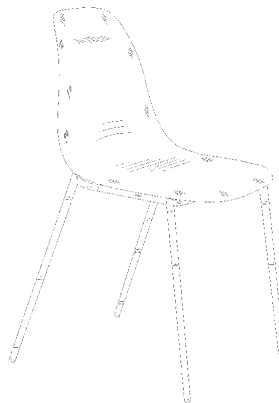
(57) **CLAIM**

The ornamental design for a chair, as shown and described.

DESCRIPTION

FIG. 1 is a front view of a chair bearing the design;
 FIG. 2 is a rear view thereof;
 FIG. 3 is a left side view thereof;
 FIG. 4 is a right side view thereof;
 FIG. 5 is a top view thereof;
 FIG. 6 is a bottom view thereof; and,
 FIG. 7 is a front-left perspective view thereof.
 The broken lines showing portions of the chair form no part of the claimed design.

1 Claim, 7 Drawing Sheets



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8 EXHIBIT 3
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(12) **United States Design Patent** (10) **Patent No.:** **US D936,991 S**
Li (45) **Date of Patent:** **** Nov. 30, 2021**

(54) **CHAIR** 2,980,454 A * 4/1961 Thaden A47C 1/124
 403/169
 (71) Applicant: **Homy Casa Limited**, Hong Kong (HK) 3,261,640 A * 7/1966 Straits A47C 15/002
 297/135
 (72) Inventor: **YueHai Li**, Guangzhou (CN) 3,393,941 A * 7/1968 Grosfillex A47C 7/02
 297/440.22
 (73) Assignee: **HOMY CASA LIMITED**, Hong Kong (HK) D544,230 S * 6/2007 Glass D6/375
 D546,087 S * 7/2007 Rashid D6/375
 D592,873 S * 5/2009 Olano Jauregui D6/373
 D608,549 S * 1/2010 Novak D6/334
 D609,489 S * 2/2010 Adams D6/375
 D666,015 S * 8/2012 Morrison D6/360
 D690,147 S * 9/2013 Meyer D6/375
 D719,365 S * 12/2014 Adams D6/360
 D748,927 S * 2/2016 Feichtner D6/375
 D772,594 S * 11/2016 Fukasawa D6/375
 D778,657 S * 2/2017 Morrison D6/373
 D798,069 S * 9/2017 Iqbal D6/334
 D798,070 S * 9/2017 Iqbal D6/334
 D808,669 S * 1/2018 Li D6/334
 D809,315 S * 2/2018 Grabowski D6/375
 (**) Term: **15 Years**
 (21) Appl. No.: **29/671,368**
 (22) Filed: **Nov. 27, 2018**
 (51) **LOC (13) Cl.** **06-01**
 (52) **U.S. Cl.** **D6/375**
 (58) **Field of Classification Search**
 USPC D6/334, 336, 344, 345, 348, 349, 350,
 D6/352, 353, 355, 358, 360, 364, 368,
 D6/369, 370, 371, 373, 375, 379, 380,
 D6/381, 677, 692.3, 708, 708.16, 716,
 D6/717; D11/184; D21/521; D23/292
 CPC .. A47C 1/12; A47C 1/124; A47C 3/00; A47C
 3/04; A47C 3/12; A47C 3/14; A47C 3/16;
 A47C 3/18; A47C 3/20; A47C 3/34;
 A47C 4/02; A47C 4/03; A47C 4/38;
 A47C 4/10; A47C 4/24; A47C 4/045;
 A47C 4/286; A47C 5/06; A47C 5/04;
 A47C 5/12; A47C 5/043; A47C 7/00;
 A47C 7/16; A47C 7/002; A47C 7/445;
 A47C 7/448; A47C 7/506; A47C 7/52;
 A47C 7/50; A47C 9/00; A47C 9/007;
 A47D 1/00; A01M 31/02; Y10S 297/02
 See application file for complete search history.

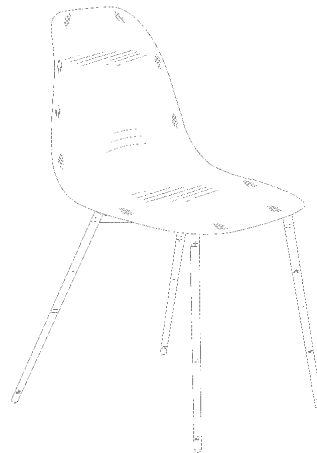
(Continued)
 Primary Examiner — Kevin K Rudzinski
 Assistant Examiner — Paul D Bohannon
 (74) Attorney, Agent, or Firm — Hauptman Ham, LLP

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

DESCRIPTION
 FIG. 1 is a front view of a chair bearing the design;
 FIG. 2 is a rear view thereof;
 FIG. 3 is a left side view thereof;
 FIG. 4 is a right side view thereof;
 FIG. 5 is a top view thereof;
 FIG. 6 is a bottom view thereof; and,
 FIG. 7 is a front-left perspective view thereof.
 The broken lines showing portions of the chair form no part
 of the claimed design.

(56) **References Cited**
 U.S. PATENT DOCUMENTS
 D182,790 S * 5/1958 Cohen D6/375
 2,893,469 A * 7/1959 Eames A47C 5/12
 297/239

1 Claim, 7 Drawing Sheets



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7 **EXHIBIT 4**
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(12) **United States Design Patent** (10) **Patent No.:** **US D936,992 S**
Li (45) **Date of Patent:** **** *Nov. 30, 2021**

(54) **CHAIR** 2,980,454 A * 4/1961 Thaden, V A47C 1/124
 403/169
 (71) Applicant: **Homy Casa Limited**, Hong Kong (HK) 3,261,640 A * 7/1966 Straits A47C 15/002
 297/135
 (72) Inventor: **YueHai Li**, Guangzhou (CN) 3,393,941 A * 7/1968 Grosfillex A47C 7/02
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 (73) Assignee: **HOMY CASA LIMITED**, Hong Kong (HK) D544,230 S * 6/2007 Glass D6/375
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(*) Notice: This patent is subject to a terminal disclaimer.
 (**) Term: **15 Years**

(21) Appl. No.: **29/671,564**
 (22) Filed: **Nov. 28, 2018**

(51) **LOC (13) Cl.** **06-01**
 (52) **U.S. Cl.** **D6/375**

(58) **Field of Classification Search**
 USPC D6/334, 336, 344, 345, 348, 349, 350, D6/352, 353, 355, 358, 360, 364, 368, D6/369, 370, 371, 373, 375, 379, 380, D6/381, 677, 692.3, 708, 708.16, 716, D6/717; D11/184; D21/521; D23/292
 CPC .. A47C 1/12; A47C 1/124; A47C 3/00; A47C 3/04; A47C 3/12; A47C 3/14; A47C 3/16; A47C 3/18; A47C 3/20; A47C 3/34; A47C 4/02; A47C 4/03; A47C 4/38; A47C 4/10; A47C 4/24; A47C 4/045; A47C 4/286; A47C 5/06; A47C 5/04; A47C 5/12; A47C 5/043; A47C 7/00; A47C 7/16; A47C 7/002; A47C 7/445; A47C 7/448; A47C 7/506; A47C 7/52; A47C 7/50; A47C 9/00; A47C 9/007; A47D 1/00; A01M 31/02; Y10S 297/02
 See application file for complete search history.

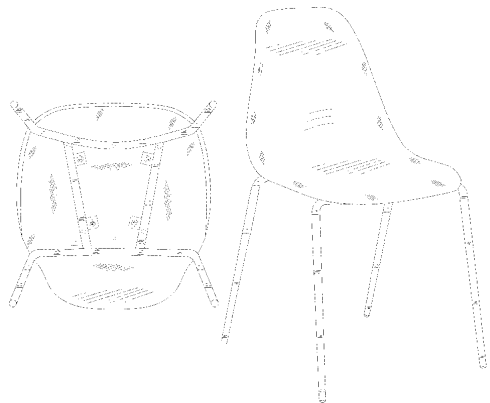
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 Primary Examiner — Kevin K Rudzinski
 Assistant Examiner — Paul D Bohannon
 (74) *Attorney, Agent, or Firm* — Hauptman Ham, LLP

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

DESCRIPTION
 FIG. 1 is a front view of a chair bearing the design;
 FIG. 2 is a rear view thereof;
 FIG. 3 is a left side view thereof;
 FIG. 4 is a right side view thereof;
 FIG. 5 is a top view thereof;
 FIG. 6 is a bottom view thereof; and,
 FIG. 7 is a front-left perspective view thereof.
 The broken lines showing portions of the chair form no part of the claimed design.

1 Claim, 7 Drawing Sheets



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EXHIBIT 5

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JILI CREATION

D808669	Accused Product	Remarks
 <p>Fig. 7</p>		<p>The claimed design reads upon the JILI CREATION Dining Room Side Chair</p> 
 <p>Fig. 8</p>		<p>https://www.wayfair.com/furniture/pdp/mercury-row-tapscott-upholstered-side-chair-w005303557.html</p>
 <p>Fig. 9</p>		
 <p>Fig. 10</p>		
 <p>Fig. 11</p>		
 <p>Fig. 12</p>		
 <p>Fig. 13</p>		
 <p>Fig. 14</p>		
 <p>Fig. 15</p>		

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EXHIBIT 6

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JILI CREATION

D920703	Accused Product	Remarks
 <p>Fig. 7</p>		<p>The claimed design reads upon the JILI CREATION Dining Room Side Chair</p> 
 <p>Fig. 8</p>		<p>https://www.wayfair.com/furniture/pdp/mercury-row-tapscott-upholstered-side-chair-w065303557.html</p>
 <p>Fig. 9</p>		
 <p>Fig. 10</p>		
 <p>Fig. 11</p>		
 <p>Fig. 12</p>		
 <p>Fig. 13</p>		

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EXHIBIT 7

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JILI CREATION

D936991	Accused Product	Remarks
 <p data-bbox="678 436 724 447">Fig. 7</p>		<p data-bbox="976 247 1177 304">The claimed design reads upon the JILI CREATION Dining Room Side Chair</p> 
 <p data-bbox="678 642 724 661">Fig. 1</p>		<p data-bbox="966 447 1177 499">https://www.wayfair.com/furniture/pdp/mercury-row-tapscott-upholstered-side-chair-w005303557.html</p>
 <p data-bbox="678 856 724 875">Fig. 2</p>		
 <p data-bbox="678 1119 724 1140">Fig. 3</p>		
 <p data-bbox="678 1371 724 1386">Fig. 4</p>		
 <p data-bbox="678 1602 724 1631">Fig. 5</p>		
 <p data-bbox="678 1833 724 1852">Fig. 6</p>		

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EXHIBIT 8

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JILI CREATION

D936992	Accused Product	Remarks
 <p>Fig. 7</p>		<p>The claimed design reads upon the JILI CREATION Dining Room Side Chair</p> 
 <p>Fig. 1</p>		<p>https://www.wayfair.com/furniture/pdp/mercury-row-tapscott-upholstered-side-chair-w005303557.html</p>
 <p>Fig. 2</p>		
 <p>Fig. 3</p>		
 <p>Fig. 4</p>		
 <p>Fig. 5</p>		
 <p>Fig. 6</p>		