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8 **UNITED STATES DISTRICT COURT**
9 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

10 Guangzhou Talong Technology Co.,
11 Ltd., Shenzhen Jianyuan Electronics
Technology Co., Ltd., Guangzhou
12 Shirui Technology Co., Ltd., TOLOCO
INC

13 *Plaintiffs,*

14 v.

15 HYPERICE IP SUBCO, LLC,
16

17 *Defendant.*

Case No.: 8:24-cv-1349

COMPLAINT

DEMAND FOR JURY TRIAL

18 This is an action brought under the Declaratory Judgment Act by Plaintiffs
19 Guangzhou Talong Technology Co., Ltd. d/b/a Eaglewood Trading (formerly
20 known as “A-Top USA”) (“Guangzhou Talong”), Shenzhen Jianyuan Electronics
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1 Technology Co., Ltd. d/b/a easy-fit (formerly known as “jian yuan”) (“Shenzhen
2 Jianyuan”), Guangzhou Shirui Technology Co., Ltd. d/b/a cindick (“Guangzhou
3 Shirui”), TOLOCO INC d/b/a TOLOCOINC STORE (collectively as “Plaintiffs”),
4 against Defendant HYPERICE IP SUBCO, LLC (“Defendant” or “HYPERICE”),
5 claiming for patent non-infringement of certain Massage Guns under the brand
6 TOLOCO as defined herein (“Massage Guns”), invalidity against U.S. Patent No.
7 11,938,082 B1 (“’082 Patent”), and violation of California Unfair Competition Law
8 Section 17200 (CAL. BUS. PROF & CODE §17200, et seq.). Upon actual
9 knowledge with respect to itself and its acts, and upon information and belief as to
10 all other matters, Plaintiffs allege as follows:

11 **INTRODUCTION**

12 1. Plaintiffs received several notifications from Amazon.com on June 18
13 and 19, 2024, stating that Plaintiffs’ Massage Guns under the brand TOLOCO were
14 removed because of the alleged infringement of the ’082 Patent. Amazon notified
15 Plaintiffs that it needs a court order stating that Plaintiffs are allowed to sell the
16 removed products to reactivate their listings. Defendant’s objectively baseless
17 infringement complaint to Amazon has caused and continues to cause significant
18 harm to Plaintiffs as the Massage Guns have been removed from Amazon as
19 Plaintiffs will lose all associated good will in the listings, not to mention lost sales.
20 The alleged infringement to Amazon is wholly without merit as the Plaintiffs’

1 Massage Guns do not meet each and every limitation of any claim under the '082
2 Patent. Furthermore, the '082 Patent is invalid under 35 U.S.C. §§ 102, 103 and 112.

3 **NATURE OF THE ACTION**

4 2. This action seeks Declaratory Judgments of patent non-infringement
5 under the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the United States
6 Patent Laws, 35 U.S.C. § 101 *et seq.* Defendant's actions have caused and continues
7 to cause significant harm to Plaintiffs as the Massage Guns have been removed from
8 Amazon through the enforcement of the '082 Patent.

9 3. This is an action under the Declaratory Judgment Act, 28 U.S.C. §§
10 2201 and 2202, seeking a declaratory judgment that Defendant's U.S. Patent No.
11 11,478,082 is invalid under at least 35 U.S.C. §§ 102, 103 and 112.

12 4. This case is for unfair competition arising under California Business
13 and Profession Code §§ 17200, §§ 17500, §§ 17535.

14 **PARTIES**

15 5. Plaintiff Guangzhou Talong is a foreign company organized under the
16 laws of the People's Republic of China. Guangzhou Talong maintains a place of
17 business at Room 2301, No. 152-2, North Huangbian Road, Baiyun District,
18 Guangzhou, China.

19 6. Plaintiff Shenzhen Jianyuan is a foreign company organized under the
20 laws of the People's Republic of China. Shenzhen Jianyuan maintains a place of
..

1 business at Floor 56, Room 5603A, SEG Plaza, Huaqiangbei Road, Huaqiangbei
2 Street, Futian District, Shenzhen, Guangzhou, China.

3 7. Plaintiff Guangzhou Shirui is a foreign company organized under the
4 laws of the People’s Republic of China. Guangzhou Shirui maintains a place of
5 business at Room D334, 4th Floor, No. 40, Dajinzong Road, Baiyun District,
6 Guangzhou, China.

7 8. Plaintiff TOLOCO, INC. is a California Stock Corporation having a
8 place of business at 9080 Telstar Ave, Suite 332, El Monte, CA 91731.

9 9. Upon information and belief, Defendant HYPERICE is a Delaware
10 limited liability company with its principal place of business at 525 Technology
11 Drive, Suite 100, Irvine, CA 92618.

12 **JURISDICTION AND VENUE**

13 1. This Court has subject matter jurisdiction under 28 U.S.C. §§ 2201,
14 2202, 1331, 1338(a), because this action arises under the laws of the United States,
15 in particular the Patent Act of the United States, 35 U.S.C. § 100 et seq.

16 2. This Court also has supplemental jurisdiction over Plaintiffs’ state law
17 claims pursuant to 28 U.S.C. § 1367. Plaintiffs bring this action under the principle
18 of pendent jurisdiction, to recover damages, costs of suit, and reasonable attorneys’
19 fees, against Defendant for appropriate relief arising from Defendant’s violation of
20 California Business and Profession Code §§ 17200, §§ 17500, §§ 17535.

1 3. An actual case or controversy exists between the parties to this action.
2 Defendant's actions have caused and continue to cause significant harm to Plaintiffs
3 as the Massage Guns have been removed from Amazon through the enforcement of
4 the '082 Patent. Defendant's actions thereby give rise to an actual controversy under
5 28 U.S.C. §§ 2201 et. seq.

6 4. Venue is proper in this district pursuant to at least 28 U.S.C. § 1391,
7 because a substantial part of the events giving rise to the claim occurred in this
8 District. At issue in this action is whether Plaintiffs commit acts of infringement in
9 the United States and whether products made, sold, offered for sale, used and/or
10 imported into the United States by Plaintiffs infringe the '082 Patent. Defendant has
11 its principal place of business in this District and the allegedly infringing activities
12 have occurred in this District.

13 5. Furthermore, Personal jurisdiction and venue exist in this Court over
14 Defendant as it is domiciled in this judicial district.

15 **THE PLAINTIFFS' MASSAGE GUNS**

16 6. Plaintiff Guangzhou Talong sells Massage Guns on Amazon under the
17 storefront "Eaglewood Trading," formerly known as "A-Top USA," which has
18 earned a lifetime rating of 4.9 out of 5 stars. The Massage Guns listings sold by
19 Guangzhou Talong at issue are identified by ASIN No. B089KJTW4V.
20
..

1 7. On or about June 19, 2024, Guangzhou Talong received a notification
2 from Amazon. *See* Exhibit A. This notice informed Guangzhou Talong that Amazon
3 removed Guangzhou Talong’s listing, ASIN No. B089KJTW4V, because of the
4 alleged infringement of the ’082 Patent. The Rights owner’s name is HYPERICE
5 and its email address is barnold@hyperice.com. *Id.*

6 8. Plaintiff Shenzhen Jianyuan sells Massage Guns on Amazon under the
7 storefront “easy-fit,” formerly known as “jian yuan.” The Massage Guns listings
8 sold by Shenzhen Jianyuan at issue are identified by ASIN Nos. B0BWYVNYW1,
9 B083LKVPJV, B089KJTW4V, and B0BWYPSWML.

10 9. On or about June 19, 2024, Shenzhen Jianyuan received a notification
11 from Amazon. *See* Exhibit B. This notice informed Shenzhen Jianyuan that Amazon
12 removed Guangzhou Talong’s listings, ASIN Nos. B0BWYVNYW1,
13 B083LKVPJV, B089KJTW4V, and B0BWYPSWML, because of the alleged
14 infringement of the ’082 Patent. The Rights owner’s name is HYPERICE and its
15 email address is barnold@hyperice.com. *Id.*

16 10. Plaintiff Guangzhou Shirui sells Massage Guns on Amazon under the
17 storefront “cindick,” which has earned a lifetime rating of 4.9 out of 5 stars. The
18 Massage Guns listings sold by Guangzhou Shirui at issue are identified by ASIN
19 Nos. B083L8RNJR, B0BWYVNYW1, B083LKVPJV, B089KJTW4V, and
20 B0BWYPSWML.

1 11. On or about June 19, 2024, Guangzhou Shirui received a notification
2 from Amazon. *See* Exhibit C. This notice informed Guangzhou Shirui that Amazon
3 removed Guangzhou Shirui’s listings, ASIN Nos. B083L8RNJR, B0BWYVNYW1,
4 B083LKVPJV, B089KJTW4V, and B0BWYPSWML, because of the alleged
5 infringement of the ’082 Patent. The Rights owner’s name is HYPERICE and its
6 email address is barnold@hyperice.com. *Id.*

7 12. Plaintiff TOLOCOINC sells Massage Guns on Amazon under the
8 storefront TOLOCOINC STORE. The Massage Guns listings sold by TOLOCOINC
9 at issue are identified by ASIN Nos. B083L8RNJR, B0BWYVNYW1,
10 B083LKVPJV, B089KJTW4V, and B0BWYPSWML.

11 13. On or about June 18, 2024, TOLOCOINC received a notification from
12 Amazon. *See* Exhibit D. This notice informed TOLOCOINC that Amazon removed
13 TOLOCOINC’s listing, ASIN No. B089KJTW4V, because of the alleged
14 infringement of the ’082 Patent. The Rights owner’s name is HYPERICE and its
15 email address is barnold@hyperice.com. *Id.*

16 14. The Amazon marketplace constitutes Plaintiffs’ primary sales channel
17 into the United States. To remain competitive in the United States market for
18 Massage Guns, Plaintiffs need their products listed in the Amazon marketplace.
19 Amazon has removed Plaintiffs’ Massage Guns from the marketplace, preventing
20 Plaintiffs from accessing their largest channel of trade because of Defendant’s
..

1 alleged infringement complaint to Amazon. Thus, Defendant’s submission of
2 Amazon infringement complaint has caused and continues to cause immediate and
3 irreparable harm to Plaintiffs.

4 **U.S. PATENT NO. 11,938,082 B1**

5 15. The face of the ’082 Patent lists HYPERICE IP SUBCO, LLC, as the
6 applicant and assignee, attached as Exhibit E.

7 16. The ’082 Patent is entitled “Massage Device Having Variable Stroke
8 Length” and claims “A percussive massager comprising: [] drive mechanism that
9 controls a predetermined stroke length of the piston; and quick-connect system [] is
10 configured to have a proximal end of the first massaging head inserted into or
11 removed from the bore while the piston reciprocates the predeter- mined stroke
12 length at the first speed.” *See* Exhibit E, at 9:64; 10: 4-11.

13 17. The ’082 Patent was issued on March 26, 2024. The ’082 Patent has
14 two independent claims and sixteen dependent claims.

15 **COUNT I**
16 **(DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF THE ’082**
17 **PATENT)**

18 18. Plaintiffs incorporate by reference the allegations set forth above in this
19 Complaint as if fully set forth herein.

20 19. An actual, continuing and justiciable controversy exists between
.. Plaintiffs and Defendant concerning the non-infringement of the ’082 Patent by the

1 Massage Guns, as evidenced by Defendant’s allegations of infringement on Amazon,
2 as set forth above.

3 20. Plaintiffs’ Massage Guns do not infringe any of the presumably valid
4 claims of the ’082 Patent, as the Massage Guns fail to meet one or more elements of
5 the two independent claims 1 and 18 of the ’082 Patent.

6 21. For example, the limitations of the ’082 Patent, “a drive mechanism
7 that controls a predetermined stroke length of the piston”, *See* Exhibit E, at 10: 4-5,
8 should be construed as a mechanism that includes at least a cam or cam-like
9 adjustment mechanism to adjust the stroke length of the piston based on specific user
10 needs after the massage device has been manufactured and before the user operates
11 or uses the device. However, Plaintiffs’ Massage Guns do not meet such a drive
12 mechanism that controls a predetermined stroke length of the piston, whether
13 literally or under the doctrine of equivalents.

14 22. As another example, the limitations of claim 1 of the ’082 Patent
15 comprise “A percussive massager comprising: quick-connect system [] is
16 configured to have a proximal end of the first massaging head inserted into or
17 removed from the bore while the piston reciprocates the predetermined stroke length
18 at the first speed.” *See* Exhibit E, at 9:64; 10: 4-11. Plaintiffs’ Massage Guns do not
19 meet such a quick-connect system, nor can it have the proximal end of the
20 first massaging head inserted into or removed from the bore while
..

1 the piston reciprocates the predetermined stroke length at the first speed, whether
2 literally or under the doctrine of equivalents. If the Plaintiffs' massage guns operate
3 in the manner described in claim 1, it will lead to motor overload, which in turn can
4 cause serious safety incidents such as explosions and fires. This is a prohibited
5 unsafe behavior for the Plaintiffs' massage guns.

6 23. Thus, among other things, Plaintiffs' Massage Guns have entirely
7 different structures and do not meet the limitations of claim 1 and claim 18 of
8 the '082 Patent.

9 24. Likewise, since the sole independent claim 1 is not infringed, neither
10 are dependent claims 2-17. *Wahpeton Canvas Co. v. Frontier, Inc.*, 870 F.2d 1546,
11 1552 n.9, 1553 (Fed. Cir. 1989) (a dependent claim cannot be infringed if any claim
12 from which it depends is not infringed).

13 25. Defendant's baseless infringement reports on the Amazon platform
14 have caused an imminent and real threat of an infringement lawsuit.

15 26. Pursuant to the Declaratory Judgment Act, Plaintiffs request a judicial
16 determination and declaration that the Massage Guns do not infringe, either directly
17 or indirectly, literally or under the doctrine of equivalents, any presumably valid
18 claim of the '082 Patent.

19 **COUNT II**
20 **(DECLARATORY JUDGMENT OF INVALIDITY OF THE '082 PATENT)**

1 27. Plaintiffs incorporate by reference the allegations set forth above in this
2 Complaint as if fully set forth herein.

3 28. An actual, continuing and justiciable controversy exists between
4 Plaintiffs and Defendant concerning the validity of the '082 Patent, as evidenced by
5 Defendant's allegations of infringement on Amazon, as set forth above.

6 29. Claims 1-18 of the '082 Patent are invalid under 35 U.S.C. § 102 and/or
7 § 103 at least in light of the prior art cited herein.

8 30. U.S. Patent No. 6,682,496 is entitled "Deep muscle stimulator device"
9 to Pivaroff ("Pivaroff"). Pivaroff has an earliest effective filing date of December
10 28, 1999. A copy of Pivaroff is attached as Exhibit F.

11 31. U.S. Patent No. 5,134,777 is entitled "Adjustable stroke reciprocating
12 mechanism for a power tool" to Meyer ("Meyer"). Meyer has an earliest effective
13 filing date of December 5, 1991. A copy of Meyer is attached as Exhibit G.

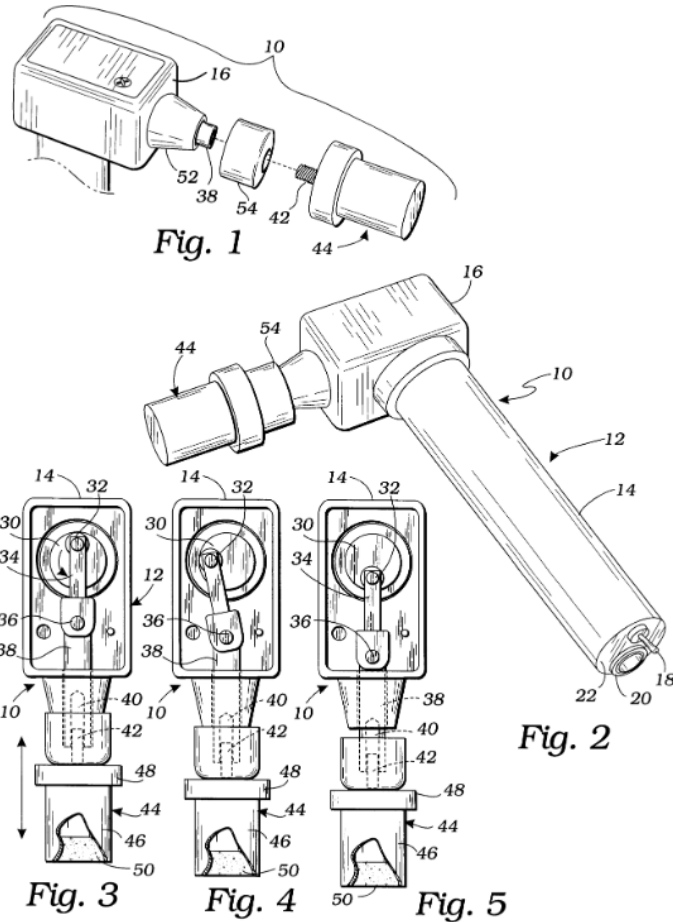
14 32. U.S. Patent Publication No. 2008/0243039 is entitled "Oxygenating
15 cosmetic instrument" to Rhoades ("Rhoades"). Rhoades has an application date of
16 May 2, 2008. A copy of Rhoades is attached as Exhibit H.

17 33. U.S. Patent Publication No. 2015/0374576 is entitled "Self-Massage
18 Device" to Dagan ("Dagan"). Dagan has an application date of Aug 27, 2015. A
19 copy of Dagan is attached as Exhibit I.

1 34. For example, Claims 1 and 18 are rendered obvious over Pivaroff,
2 Meyer, and Dagan/Rhoades under 35 U.S.C. §103 (with citations in the
3 corresponding reference below):

- 4 a. Pivaroff discloses a massager apparatus (Fig. 2, device 10) comprising:
5 a housing (Fig. 2, body 12 and top element 16 form an overall
6 “housing” for the device); a massaging head (mating head 44) having
7 a proximal end; a handle (Fig. 2, handle 14); a piston having a
8 proximal end and a distal end (Figs. 3-5, link 34 and rod 38 form a
9 “piston.” Link 34 is located at the proximal end of the piston and rod
10 38 is located at the distal end of the piston); a motor at least partially
11 within the housing and operatively connected to the proximal end of
12 the piston (Fig. 6, electrical motor 24 is mounted within the handle
13 portion of the housing. Motor 24 is connected to the link 34 via
14 elements 26, 28, 30, and 32), wherein the motor is configured to cause
15 the piston to reciprocate at a first speed (Col. 3, In. 44-47, discloses
16 speeds between 2000 to 3600 RPM); and a releasable/detachable
17 connector at the distal end of the piston, wherein the releasable
18 connector is configured to connect to a first massaging head (Fig. 3,
19 recessed opening 40 in rod 38 is threaded and forms a releasable
20 connector for attaching a mating head 44); and a drive mechanism
..

(Figs. 3-5, cam element 30 with finger 32) for converting the rotary motion of the motor into linear reciprocating motion. See Pivaroff's drawings below:



See Exhibit F.

b. Meyer disclosed such a drive mechanism that controls a predetermined stroke length of the piston. Specifically, Meyer disclosed a cam (Figs. 6a-7c, actuator plate 50, ring gear 42, and pin 40 form a cam) having a first rotational position that controls a

1 predetermined stroke length of the piston to the minimum
2 reciprocation stroke length (Figs. 6a-6b depict the actuator plate 50
3 and actuator lever 50c in a first rotational position for a minimum
4 stroke length), a second rotational position that controls the
5 predetermined stroke length of the piston to the maximum
6 reciprocation stroke length (Figs. 7a-7b depict the actuator plate 50
7 and actuator lever 50c in a second rotational position for a maximum
8 stroke length), and a plurality of intermediate rotational positions that
9 control the predetermined stroke length of the piston to a plurality of
10 intermediate stroke lengths between the minimum reciprocation stroke
11 length and the maximum reciprocation stroke length (Col. 4, In. 45-
12 54, discloses positioning the arm 50c in different intermediate
13 positions to cause the pin 40 to move through intermediate elliptical
14 paths). See Meyer's drawings below:

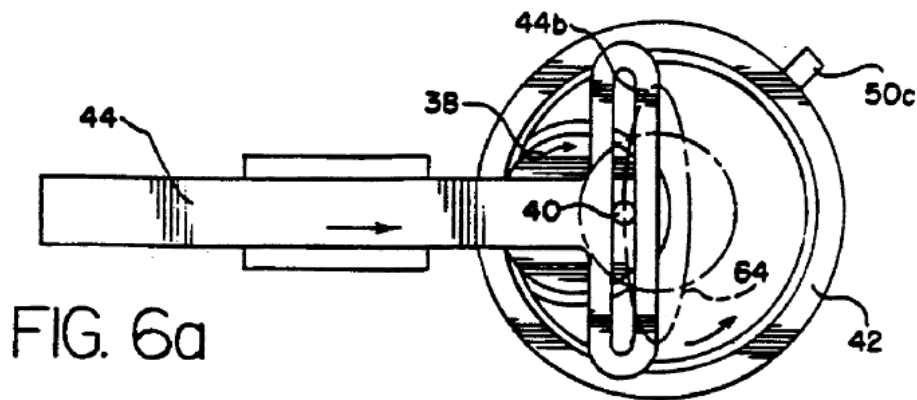


FIG. 6a

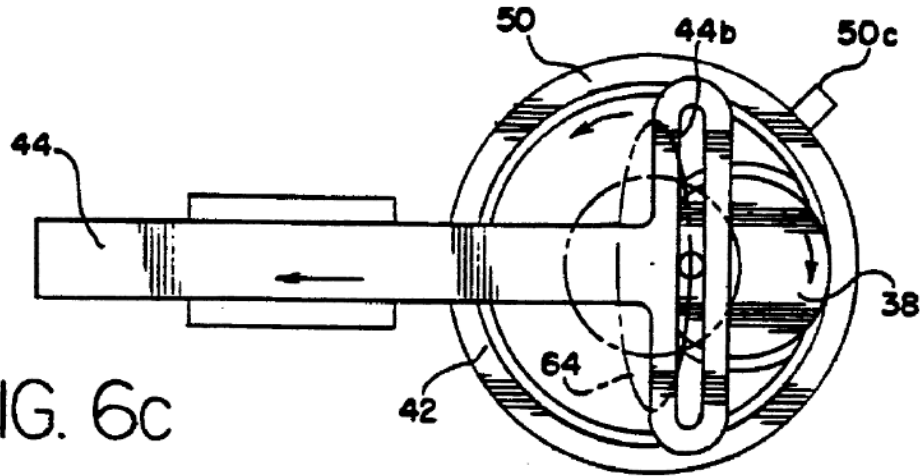
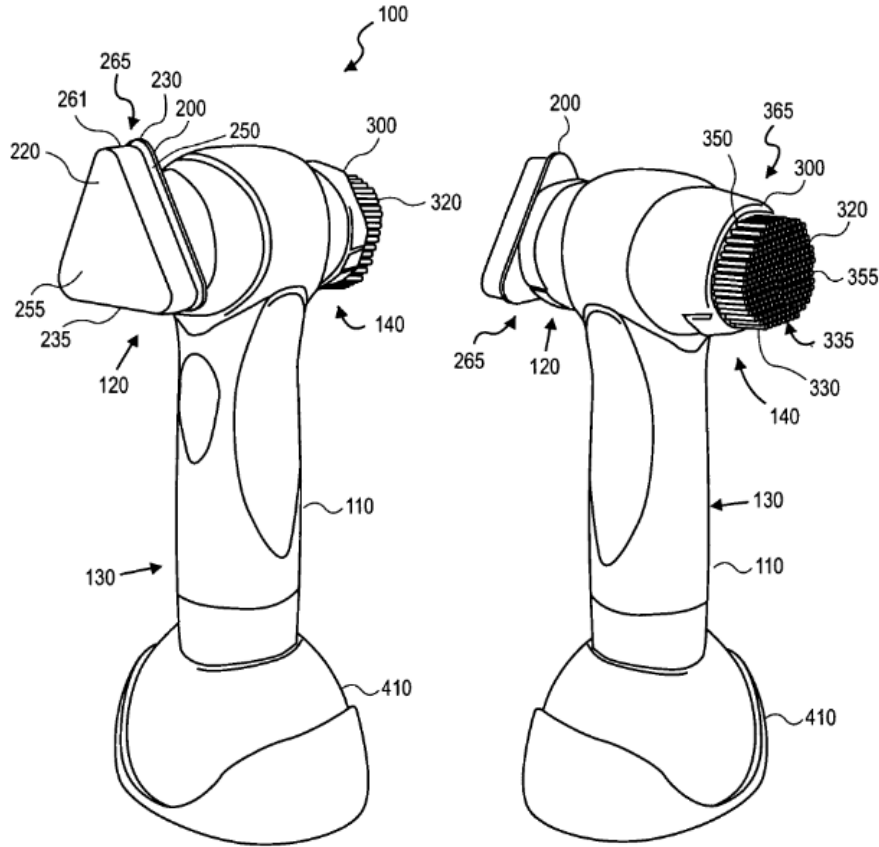


FIG. 6c

See Exhibit G.

- c. Based on Meyer's teachings, a person of ordinary skill in the art would be motivated to utilize Meyer's cam (actuator plate 50, ring gear 42, and pin 40) to modify or replace the drive mechanism in Pivaroff. In this way, the modified Pivaroff would be able to control a predetermined stroke length of the piston. This would merely be a predictable use of the established function of Meyer's cam (changing the stroke length).
- d. In addition, Rhoades discloses a massaging device (Fig. 4A, device 100) comprising a housing (Fig. 4A, handle portion 130 and head portions 120, 140 form a housing) having a quick release connector for attaching removable massage heads (Figs. 4A-4B, attachment heads 200 may be connected to the head portions 120/140 of the housing via a quick release connector). Rhoades discloses that these

1 quick release connectors can be threaded mating or magnetic attractive
2 force ([0061]). See Rhoades's drawings below:



14 **FIG. 4A**

14 **FIG. 4B**

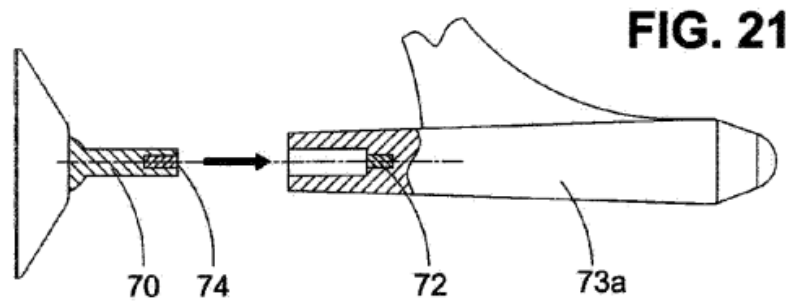
15 *See Exhibit H.*

- 16 e. Therefore, it would have been obvious to one of ordinary skill in the
17 art before the effective filing date of the claimed invention to replace
18 the threaded connection between the massaging head and the piston of
19 Pivaroff with a magnetic attractive force connection as taught by
20 Rhoades.

1 f. For the Pivaroff-Meyer-Rhoades combination, a person of ordinary
2 skill in the art would understand that the combination itself would
3 inherently allow the user to perform the functions configured for the
4 quick-connect system as claimed in claim 1.

5 g. Alternatively, Dagan also teaches a massaging device comprising a
6 base (Fig. 21, arm 73a having a recess defined therein to house a
7 securing magnet 72) and an attachment member that removably
8 couples to the base via magnetic attraction (Fig. 21, stem 70 comprises
9 a recess holding a magnet 74 to attract the magnet 72 of the arm 73a).

10 Dagan also discloses such a magnetic attachment mechanism for body
11 treatment members (Figs. 28-31, internal magnet 80; see [0056],
12 which discloses internal magnet 80 magnetically coupling to a magnet
13 within the main massage device body). *See* Dagan's drawings below:



19 *See* Exhibit I.

1 h. Therefore, it would have been obvious to one of ordinary skill in the
2 art before the effective filing date of the claimed invention to modify
3 the treatment member of Pivaroff (already modified by Meyer) to have
4 a recess that holds a magnet for magnetic connection to a magnet in
5 the distal end of the reciprocating shaft as taught by Dagan in order to
6 provide a removable connection between the treatment member and
7 the reciprocating shaft that is quick to connect and remove, yet strong
8 during use of the device. it is understood by those skilled in the art that
9 the Pivaroff-Meyer-Dagan combination, due to the presence of a
10 magnetic coupling mechanism, will inherently enable the user to
11 achieve/perform the action of securing the massage head during piston
12 movement as recited in claim 1.

13 35. The claim 1 of the '082 Patent is also invalid pursuant to 35 U.S.C. §
14 112, due to the inclusion of both a product and a method in the same claim.
15 Specifically, claim 1 includes both the quick-connect system and the user operations
16 or actions using this quick-connect system to install/secure the massage head.

17 36. The additional/other limitations recited in claims 2-17 of the '082
18 patent remain obvious in the face of appropriate combinations of prior art and/or
19 common general knowledge. These other prior art references include: U.S. Patent
20
..

1 No. 8,083,699 (Colloca, attached as Exhibit J); U.S. Patent No. 6,432,072 (Harris,
2 attached as Exhibit K); U.S. Patent No. 1,339,179 (Elmen, attached as Exhibit L).

3 37. Plaintiffs seek a declaratory judgment that claims 1-18 of the '082
4 Patent are invalid for failing to satisfy the criteria of 35 U.S.C. § 102 and/or § 103,
5 in light of the cited prior arts.

6 **COUNT III**
7 **VIOLATION OF CALIFORNIA UNFAIR COMPETITION LAW SECTION**
8 **17200 (CAL. BUS. PROF & CODE §17200, et seq.)**

9 38. Plaintiffs hereby re-alleges and incorporates by reference the
10 allegations set forth in the preceding paragraphs.

11 39. The California Unfair Competition Law (“UCL”) prohibits acts of
12 “unfair competition”, including any “unlawful, unfair and fraudulent business act or
13 practice”. Cal. Bus. & Prof. Code § 17200.

14 40. Defendant’s actions set forth herein constitute intentional business acts
15 and practices that are unlawful, unfair, and fraudulent, including Defendant’s
16 complaints to Amazon and harassment to Plaintiffs.

17 41. As demonstrated above, Defendant violated the Unfair Competition
18 Law by sending false complaints to Amazon as to the alleged Plaintiffs’
19 infringement of Defendant’s D’082 Patent.
20
..

1 42. Defendant will continue to cause confusion, mistake, and deception as
2 to Plaintiffs' Massage Guns due to Defendant wrongfully accusing Plaintiffs'
3 infringement of Defendant's D'082 Patent.

4 43. Plaintiffs directly compete with Defendant in the Massage Guns
5 industry.

6 44. By reason of Defendant's acts of unfair competition, Plaintiffs have
7 suffered and will continue to suffer irreparable injury unless and until this Court
8 enters an order enjoining Defendant from any further acts of unfair competition.
9 Defendant's continuing acts of unfair competition, unless enjoined, will cause
10 irreparable damage to Plaintiffs in that there is no adequate remedy at law to compel
11 Defendant to cease such acts and no way to determine its losses proximately caused
12 by such acts of Defendant. Plaintiffs are therefore entitled to a preliminary injunction
13 against further unlawful, and unfair conduct by Defendant.

14 45. As a direct and proximate result of Defendant's acts of unfair
15 competition, Defendant has wrongfully taken Plaintiffs' profits and sales, as well as
16 its substantial investment of time, energy and money. Defendant should therefore
17 disgorge all profits from the above conduct and further should be ordered to perform
18 full restitution to Plaintiffs as a consequence of Defendant's unlawful, unfair, and
19 fraudulent activities.

20 **PRAYER FOR RELIEF**

1 WHEREFORE, Plaintiffs pray for judgment against Defendant as follows:

- 2 A. Preliminary and permanent injunctions ordering Defendant to withdraw
3 all Amazon infringement complaints lodged against the Massage Guns
4 based on the '082 Patent, and to refrain from lodging any further
5 infringement complaints regarding the same.
- 6 B. A declaration that the Massage Guns do not infringe any of the claims
7 of the '082 Patent;
- 8 C. A declaration that the claims of the '082 Patent are invalid for failing to
9 satisfy the criteria of 35 U.S.C. § 102 and/or § 103, in light of the newly
10 cited prior arts;
- 11 D. A finding that this case is exceptional and an award to Plaintiffs of their
12 costs, expenses, and reasonable attorney fees incurred in this action
13 pursuant to 35 U.S.C § 285; and
- 14 E. Awarding Plaintiffs damages due to Defendant's improper acts,
15 doubled and/or trebled due to the willful and exceptional nature of the
16 case.
- 17 F. Awarding Plaintiffs compensatory, general and special, consequential
18 and incidental damages in an amount to be determined at trial.
- 19 G. Awarding Plaintiffs exemplary, punitive, statutory, and enhanced
20 damages.
- ..

1 H. Awarding pre- and post- judgment interest.

2 I. Awarding Plaintiffs such other and further relief as this Court deems is
3 just and proper.

4 **JURY TRIAL DEMAND**

5 Plaintiffs hereby demand a jury trial on all issues so triable.

6
7 Respectfully submitted,
8 Glacier Law LLP

9 Date: June 19, 2024

By: /s/ Tianyu Ju

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