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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

HYDRAFACIAL LLC, formerly known as
EDGE SYSTEMS LLC,

Plaintiff,

v.

LUVU MEDICAL TECHNOLOGIES INC.,
CLARION MEDICAL TECHNOLOGIES,
INC., EUNSUNG GLOBAL CORP., and
HEALTHCARE MARKETS, INC. doing
business as POWERED BY MRP,

Defendants.

**COMPLAINT FOR
PATENT INFRINGEMENT

DEMAND FOR JURY TRIAL**

Case No. 2:24-cv-00587

Judge:

Plaintiff HydraFacial LLC, formerly known as Edge Systems LLC (“**HydraFacial**” or

“**Plaintiff**”) hereby complains of Defendants Luvo Medical Technologies Inc. (“**Luvo**”), Clarion Medical Technologies, Inc. (“**Clarion**”), Eunsung Global Corp. (“**Eunsung**”), and Healthcare Markets, Inc. doing business as Powered by MRP (“**MRP**”) (collectively, the “**Defendants**”) and alleges as follows:

I. THE PARTIES

1. Plaintiff HydraFacial is a limited liability company organized and existing under the laws of the State of California, with its principal place of business located at 3600 E. Burnett St., Long Beach, California 90809. HydraFacial LLC recently changed its name from Edge Systems LLC.

2. Plaintiff is informed and believes, and thereon alleges, that Defendant Luvo Medical Technologies Inc. is a Canadian corporation having a principal place of business at 125 Fleming Drive, Cambridge, Ontario, N1T 2B8, Canada.

3. Plaintiff is informed and believes, and thereon alleges, that Defendant Clarion Medical Technologies, Inc. is a Canadian corporation having a principal place of business at 125 Fleming Drive, Cambridge, Ontario, N1T 2B8, Canada.

4. Plaintiff is informed and believes, and thereon alleges, that Defendant Eunsung Global Corp. is a foreign corporation having a principal place of business at 120, Gieopdosi-ro, Jijeong-myeon, Wonju-si, Gangwon-do, Republic of Korea 26354.

5. Plaintiff is informed and believes, and thereon alleges, that Defendant Healthcare Markets, Inc. doing business as Powered by MRP is a Utah corporation having a principal place of business at 2720 Rasmussen Road A3, Park City, Utah 84098.

II. JURISDICTION AND VENUE

6. This is an action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. §§ 100, *et seq.*

7. This Court has original subject matter jurisdiction over the claims in this action pursuant to 35 U.S.C. §§ 271 and 281 and 28 U.S.C. §§ 1331 and 1338(a), as these claims arise under the laws of the United States.

8. This Court has personal jurisdiction over each of Defendants Luvo and Clarion because each of Defendants Luvo and Clarion have a continuous, systematic, and substantial presence within this judicial district. For example, each of Defendants Luvo and Clarion have been selling and offering for sale infringing products in this district, and committing acts of infringement in this district, including but not limited to, selling infringing products to consumers and/or retailers in this district and selling into the stream of commerce knowing such products would be sold in this district. These acts form a substantial part of the events or omissions that give rise to Plaintiff's claim.

9. Alternatively, this Court may exercise jurisdiction over each of Defendants Luvo and Clarion pursuant to Federal Rule of Civil Procedure 4(k)(2) because Plaintiff's claim arises under federal law, each of Defendants Luvo and Clarion would be foreign defendants not subject to personal jurisdiction in the courts of any state, and each of Defendants Luvo and Clarion have sufficient contacts with the United States as a whole, including, but not limited to, selling products, including the infringing products, that are distributed throughout the United States, such that this Court's exercise of jurisdiction over each of Defendants Luvo and Clarion satisfies due process.

10. This Court has personal jurisdiction over Defendant Eunsung because Defendant Eunsung has a continuous, systematic, and substantial presence within this judicial district. For example, Defendant Eunsung has been manufacturing and shipping for importation into the United States infringing products that have been sold and offered for sale in this district, and committing acts of infringement in this district, including but not limited to, selling infringing products to consumers and/or retailers in this district and selling into the stream of commerce knowing such products would be sold in this district. These acts form a substantial part of the events or omissions that give rise to Plaintiff's claim.

11. Alternatively, this Court may exercise jurisdiction over Defendant Eunsung pursuant to Federal Rule of Civil Procedure 4(k)(2) because Plaintiff's claim arises under federal law, Defendant Eunsung would be a foreign defendant not subject to personal jurisdiction in the courts of any state, and Defendant Eunsung has sufficient contacts with the United States as a whole, including, but not limited to, manufacturing and selling products, including the infringing products, that are distributed throughout the United States, such that this Court's exercise of jurisdiction over Defendant Eunsung satisfies due process.

12. This Court has personal jurisdiction over Defendant MRP because MRP has a continuous, systematic, and substantial presence within Utah and this judicial district. For example, MRP has a principal place of business in this judicial district at 2720 Rasmussen Road A3, Park City, Utah 84098. Plaintiff is informed and believes, and thereon alleges, that MRP is also making, using, selling, and/or offering to sell infringing products in this judicial district and/or sells such products into the stream of commerce knowing they will be sold in Utah and this judicial district.

13. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391 and 1400(b) as to each of the Defendants Luvo, Clarion, and Eunsung because each of the Defendants Luvo, Clarion, and Eunsung reside in this judicial district by virtue of being alien corporations and because a substantial part of the events giving rise to Plaintiff's claim occurred in this judicial district.

14. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1400(b) as to Defendant MRP because Defendant MRP resides in this judicial district, has a regular and established place of business located within this district, and because Defendant MRP has committed acts of infringement by offering to sell and/or selling infringing products in this judicial district.

III. GENERAL ALLEGATIONS

A. The HydraFacial Patents and Technology

15. HydraFacial is a worldwide leader in the design, development, manufacture, and sale of high-quality skin resurfacing and rejuvenation systems, including microdermabrasion and hydrodermabrasion systems. These systems rejuvenate skin by cleaning and exfoliating the skin surface, extracting debris from pores, and nourishing the skin's surface with therapeutic solutions, called "serums," that moisturize and protect the treated skin surface. HydraFacial markets and sells these systems throughout the United States to end users such as dermatologists, plastic surgeons, cosmetic physicians, and aestheticians at medical spas.

16. HydraFacial's latest flagship system is its revolutionary HydraFacial Syndeo® system, which is the premier hydrodermabrasion system sold in the United States. HydraFacial's revolutionary HydraFacial Syndeo® system is protected by numerous United States patents,

including U.S. Patent Nos. 9,550,052 (the “’052 Patent”), 10,357,641 (the “’641 Patent”), 10,357,642 (the “’642 Patent”), 11,446,477 (the “’477 Patent”), 11,865,287 (the “’287 Patent”), and 12,053,607 (the “’607 Patent”) (collectively, the “Asserted Patents”). In addition to the HydraFacial Syndeo® system, HydraFacial designs, develops, manufactures and sells other patented hydrodermabrasion systems, including the HydraFacial® Allegro™ and the HydraFacial® Elite™. These HydraFacial® hydrodermabrasion systems are referred to herein collectively as “the HydraFacial® Systems.”

17. On January 24, 2017, the USPTO duly and lawfully issued the ’052 Patent, titled “CONSOLE SYSTEM FOR THE TREATMENT OF SKIN.” A true and correct copy of the ’052 Patent is attached hereto as **Exhibit 1**.

18. On July 23, 2019, the USPTO duly and lawfully issued the ’641 Patent, titled “TIPS FOR SKIN TREATMENT DEVICE.” A true and correct copy of the ’641 Patent is attached hereto as **Exhibit 2**.

19. On July 23, 2019, the USPTO duly and lawfully issued the ’642 Patent, titled “REMOVABLE TIPS FOR USE WITH SKIN TREATMENT SYSTEMS.” A true and correct copy of the ’642 Patent is attached hereto as **Exhibit 3**.

20. On September 20, 2022, the USPTO duly and lawfully issued the ’477 Patent, titled “DEVICES AND METHODS FOR TREATING SKIN.” A true and correct copy of the ’477 Patent is attached hereto as **Exhibit 4**.

21. On January 9, 2024, the USPTO duly and lawfully issued the ’287 Patent, titled “DEVICES AND METHODS FOR TREATING SKIN.” A true and correct copy of the ’287 Patent is attached hereto as **Exhibit 5**.

22. On August 6, 2024, the USPTO duly and lawfully issued the '607 Patent, titled "DEVICES AND METHODS FOR TREATING SKIN." A true and correct copy of the '607 Patent is attached hereto as **Exhibit 6**.

23. HydraFacial is the owner of all right, title, and interest in the Asserted Patents.

B. Defendants' Infringing Bela MD Systems

24. Defendant Eunsung is in the business of manufacturing and exporting aesthetic medical devices to be sold by others, including dermabrasion devices that compete with the HydraFacial® Systems.

25. Defendants Luvo, Clarion, and MRP are in the business of sourcing, promoting, offering to sell, and selling aesthetic medical devices manufactured by others, including hydrodermabrasion devices manufactured by Eunsung that compete with the HydraFacial® Systems.

26. Defendants Luvo and Clarion market and sell these medical devices throughout the United States to end users, such as dermatologists, plastic surgeons, cosmetic physicians and aestheticians at medical spas, via its exclusive distributorship with MRP. *See Exhibit 7* ("MRP.io announced today that it has signed an exclusive agreement with LUVU Medical, headquartered in Ontario Canada, for the sale and distribution of four LUVU products in the United States – the Bare 808, Bela MD+ Advanced Skin Health Platform, the Darwin and the Lucent IPL.").

27. One of the competing hydrodermabrasion devices manufactured, used, sold, offered for sale, and/or imported into the United States by Defendants is known as the Bela MD+ Advanced Skin Health Platform (referred to herein as the "Bela MD System"). Defendants

Luvo, Clarion, and MRP have offered and are continuing to offer the Bela MD System for sale on their respective websites. See <https://luvomedical.com/product/bela-md/> (last visited August 14, 2024) (**Exhibit 8**); <https://www.clarionmedical.com/aesthetics/bela-md> (last visited August 14, 2024) (**Exhibit 9**); <https://mrp.io/bela-md-advanced-skin-health-platform-with-hydrogen-water-infusion.html> (last visited August 14, 2024) (**Exhibit 10**).

28. Each of Defendants Luvo, Clarion, and MRP distribute on their respective websites a brochure for the Bela MD System, which is attached as **Exhibit 11**. **Exhibit 11** is an example of one of Defendants' advertisements for the Bela MD System.

29. Attached as **Exhibit 12** are screenshots of a video from MRP's YouTube page describing the setup, operation, and maintenance of the Bela MD System. The video referenced in **Exhibit 12** is another example of the Defendants' advertisements for the Bela MD System.

30. Attached as **Exhibit 13** are screenshots of a video from the YouTube page of MRP for training users on the Bela MD System. This video referenced in **Exhibit 13** is an additional example of one of Defendants' advertisements for the Bela MD System.

31. Upon information and belief, the Bela MD System is imported from Eunsung in South Korea into the United States by Defendant Luvo. Attached as **Exhibit 14** is a bill of lading for a shipment containing, *inter alia*, the "Bela MD + Cart for Bela MD" between Luvo and Eunsung, listing Seattle, Washington as the Port of Unlading.

32. The Bela MD System is a hydrodermabrasion system for treating the skin surface of a patient. The Bela MD System, shown in the image below, includes a console that is configured to receive at least two containers containing treatment material, a handpiece that is configured to contact the skin tissue of a subject, and a vacuum source.

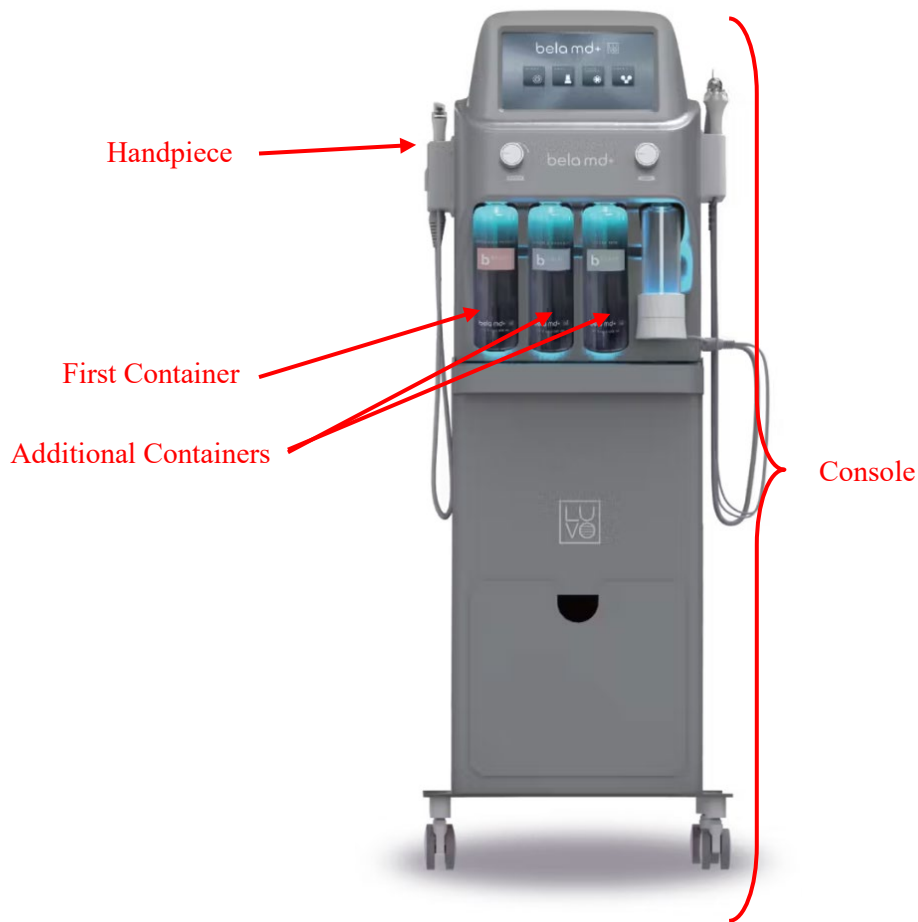


Exhibit 10 at 1.

33. The Bela MD System uses the vacuum source to both remove waste from the skin surface and draw treatment material from the containers. *See Exhibit 8* (advertising that the Bela MD System “delivers targeted Bio-infusion serum through the center of the tip, *simultaneously* cleansing and removing waste and debris.”) (emphasis added); *see also Exhibit 11* at 4 (“Serum is infused through the aqua tip while it simultaneously removes waste with radial rotation and vacuum suction.”). The console of the Bela MD System allows a user to control the selection of solutions, flow of solutions, and vacuum suction. *See Exhibit 12* (photos of setup, operation, and maintenance video of Bela MD System with knobs controlling “flow”

and “vacuum”).

34. The Bela MD System delivers the treatment material, which are skin treatment fluids, from the containers to the skin. Defendants sell skin treatment fluids including “[a]dvanced [s]erum [s]olutions to [a]ddress [c]ommon [s]kin [c]oncerns,” such as acne, the appearance of photodamage and pigment, and stressed skin. **Exhibit 8**; *see also* **Exhibit 11** at 5 (describing “[l]atest serum technology targeting key skin concerns” while “providing an overall improvement in skin quality.”).

35. The Bela MD System also includes a handpiece that is configured to receive a tip at the end of the handpiece. Defendants Luvo, Clarion, and MRP each refer to this tip as the “Aqua tip.” **Exhibit 11** at 3; **Exhibit 9** at 2; **Exhibit 10** at 2.

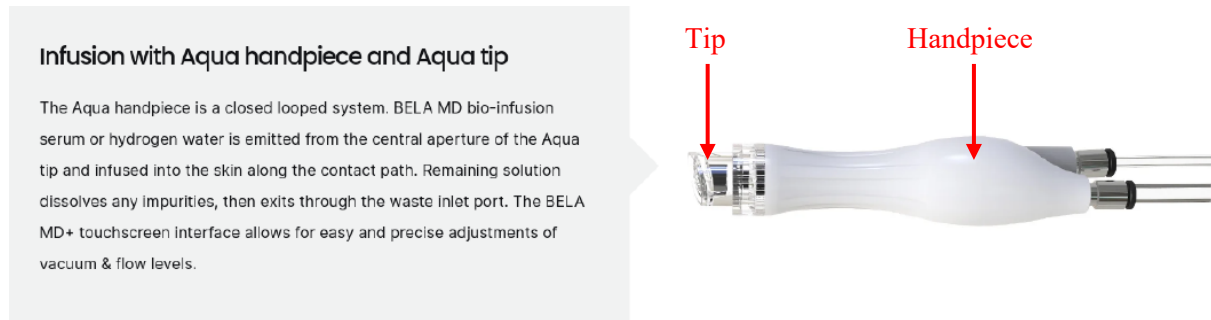


Exhibit 9 at 2.

36. The Aqua tip includes multiple openings. Fluid is delivered, and waste is suctioned away, through these openings. *See* **Exhibit 9** at 2 (“The Aqua handpiece is a closed looped system. BELA MD bio-infusion serum or hydrogen water is emitted from the central aperture of the Aqua tip and infused into the skin along the contact path. Remaining solution dissolves any impurities, then exits through the waste inlet port.”) **Exhibit 11** at 4 (“Serum is infused through the aqua tip while it simultaneously removes waste with radial rotation and

vacuum suction.”). The Aqua tip is made of plastic and includes a working surface with a pattern of raised surfaces and ports. The raised surfaces are configured to abrade and exfoliate the skin. See **Exhibit 8** at 2 (“The level of exfoliation can be customized to suit treatment needs.”); **Exhibit 13** at 1 (“The aqua handpiece is used with the aqua tip and BELA MD Bio-infusion Serums for deep cleanse, exfoliation, and serum infusion.”). The Aqua tips can be attached and detached to the handpiece of the Bela MD System. See **Exhibit 12** at 6 (showing attachment of Aqua tip).

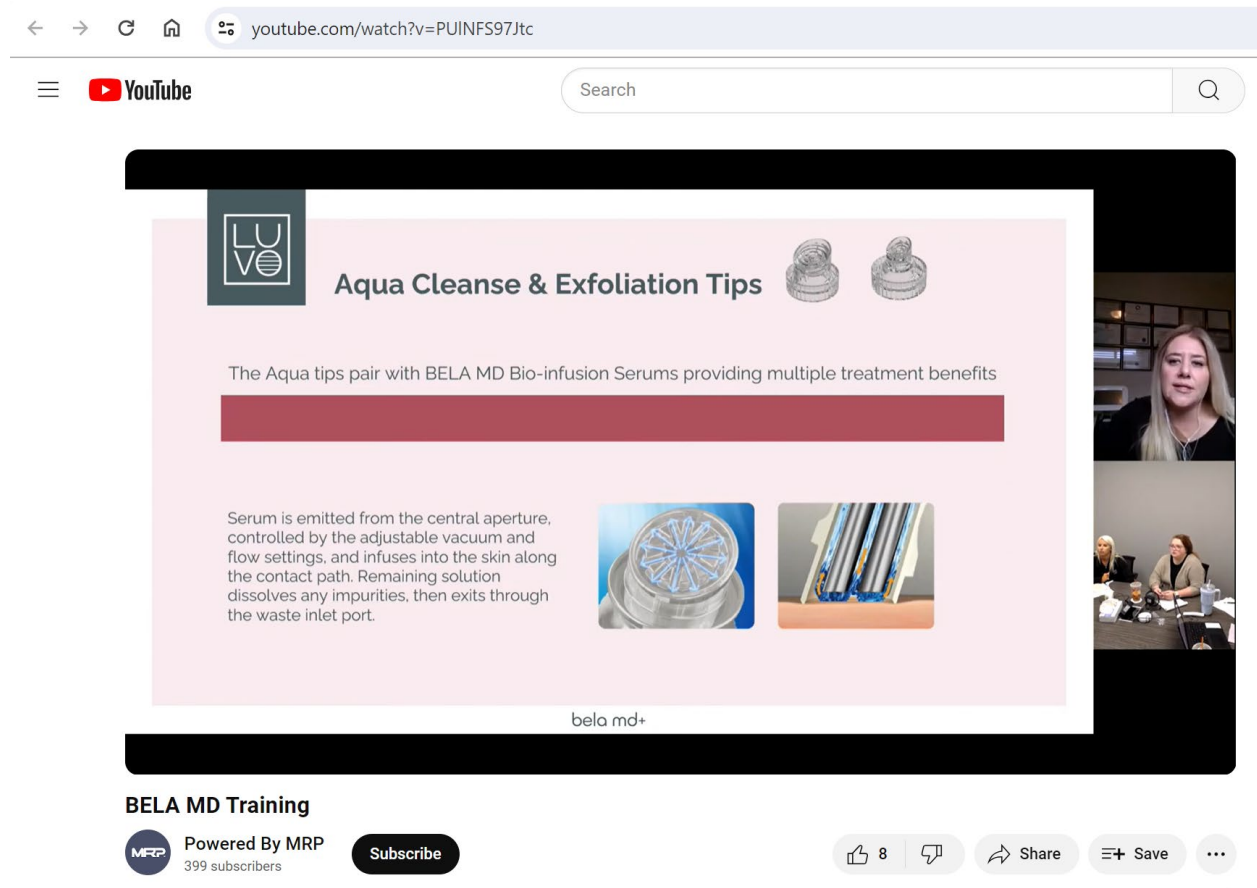


Exhibit 13 at 2.

37. Defendants either had actual knowledge of the Asserted Patents (or their respective applications) when they began making, using, offering for sale, selling, and/or

importing into the United States the infringing products, or they acted with willful blindness to their infringement.

38. Defendant Eunsung was a competitor in the aesthetic skin resurfacing equipment industry when it began making, using, offering for sale and/or selling the infringing products. On information and belief, Defendant Eunsung became familiar with the aesthetic skin treatment equipment industry since its establishment of a medical equipment production line in 2003. Thus, Defendant Eunsung has known that HydraFacial was and is an industry leader.

39. Each of Defendants Luvo, Clarion, and MRP were competitors in the aesthetic skin resurfacing equipment industry when they began making, using, offering for sale and/or selling the infringing products. On information and belief, each of the Defendants Luvo, Clarion, and MRP was familiar with the aesthetic skin treatment equipment industry prior to first offering the Bela MD System. Thus, each of Defendants Luvo, Clarion, and MRP has known that HydraFacial was and is an industry leader.

40. Given this familiarity, each of the Defendants necessarily would have researched HydraFacial and its patent portfolio before introducing the infringing Bela MD System. As part of that research, each of the Defendants would have visited HydraFacial's website marked on each of the HydraFacial® Systems, where at least the '052 Patent is marked for its hydrodermabrasion systems since 2018. **Exhibit 15**. HydraFacial continues to list patents at the following website: <https://hydrafacial.com/patents>. Each of the Defendants would have discovered the patents and any published pending patents not listed through investigation. <https://hydrafacial.com/patents> (“Additional patent applications pending”).

41. Each Defendant had actual knowledge of the Asserted Patents prior to the filing

of this lawsuit.

42. For example, each of Defendants Luvo and Clarion had actual knowledge of five of the six Asserted Patents on February 7, 2024, when they received letters from HydraFacial informing each of Defendants Luvo and Clarion of the Asserted Patents and their respective infringement thereof. A true and correct copy of the letter transmitted to each of Defendants Luvo and Clarion is attached hereto as **Exhibit 16**.

43. Defendant MRP had actual knowledge of five of the six Asserted Patents on February 5, 2024, when Defendant MRP received a letter from HydraFacial informing Defendant MRP of the Asserted Patents and its infringement thereof. A true and correct copy of the letter transmitted to Defendant MRP is attached hereto as **Exhibit 17**.

44. Defendant Eunsung had actual knowledge of the Asserted Patents on May 29, 2024, when Defendant Eunsung received a letter from HydraFacial informing Defendant Eunsung of the '287 Patent and its infringement thereof. A true and correct copy of this letter is attached hereto as **Exhibit 18**. Defendant Eunsung would have also been aware of its infringement of the '052 Patent by way of HydraFacial's suit against an exclusive distributor of Eunsung's devices, Cartessa Aesthetics, LLC ("Cartessa"). For instance, a corporate representative of Eunsung was listed in the initial disclosures of Cartessa for the "Design and function" of products accused of infringing the '052 Patent. **Exhibit 19**.

45. Upon information and belief, each of the Defendants had actual knowledge of the '607 Patent on August 7, 2024, when each of Defendants Luvo, Clarion, and MRP received a letter from HydraFacial informing each of Defendants Luvo, Clarion, and MRP of the '607 Patent and Defendants' infringement thereof. A true and correct copy of the letters transmitted

to Defendant MRP and Defendants Luvu and Clarion are attached hereto as **Exhibits 22** and **23**, respectively.

46. Each of the Defendants has infringed and continues to infringe the Asserted Patents.

47. HydraFacial has never authorized any of the Defendants to make, use, offer for sale, sell, or import into the United States the Bela MD System.

48. Each of Defendants Luvu, Clarion, MRP, and Eunsung's acts of infringement are and have been willful, intentional, and deliberate. Each of the Defendants have infringed the Asserted Patents with reckless disregard for HydraFacial's patent rights. Each of the Defendants knew, or should have known, that its actions constituted infringement of the Asserted Patents.

IV. COUNT I

INFRINGEMENT OF THE '052 PATENT

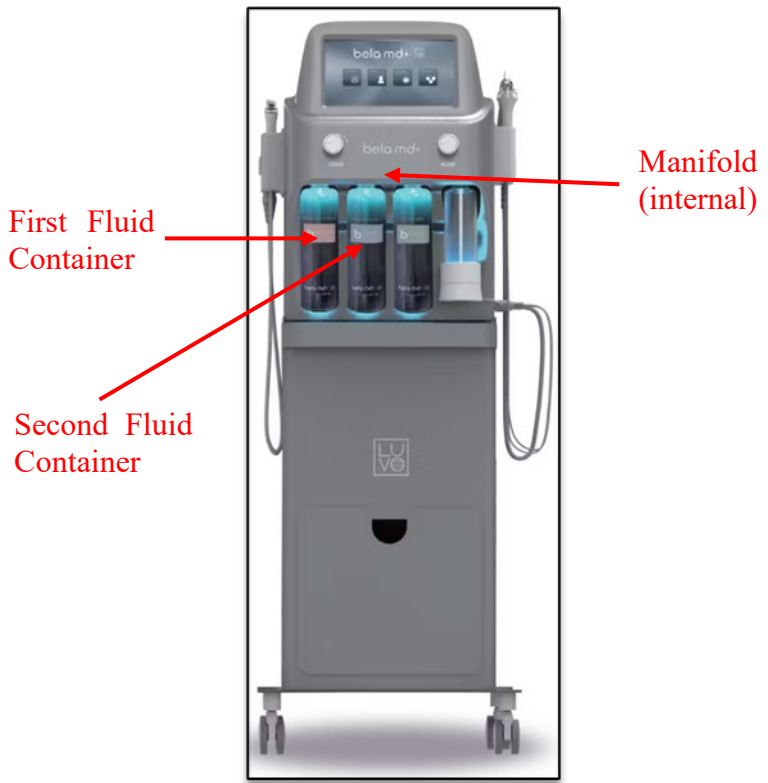
49. Plaintiff incorporates by reference and realleges each of the allegations set forth in Paragraphs 1-48 above.

50. Each of the Defendants knowingly and intentionally infringed the '052 Patent in violation of 35 U.S.C. § 271(a) through, for example, the use, sale, offer for sale, and/or importation into the United States of the Bela MD System during the term of the '052 Patent. Defendant Eunsung has made, used, offered for sale, sold, and imported into the United States the infringing Bela MD System. Defendants Luvu and Clarion have used, offered for sale, sold, and imported into the United States the infringing Bela MD System. Defendant MRP has used, offered for sale, sold, and imported into the United States the infringing Bela MD System.

51. For example, as set forth in the claim chart below, the Bela MD System

infringes at least Claim 1 of the '052 Patent.

Claim Language	Bela MD System
<p>1. A system for performing a skin treatment procedure, the system comprising:</p>	<p>To the extent the preamble is deemed to be a limitation, the Bela MD System is a system for performing a skin treatment procedure.</p> <p>The Luvo website refers to the Bela MD System as a “medical skin health platform” that is “designed to provide improvement in primary skin concerns while addressing the overall health and appearance of the skin.” Exhibit 8 (Luvo Website) at 1. The Clarion website calls the Bela MD System an “[a]dvanced [s]kin [h]ealth [p]latform” that provides a “relaxing, non invasive treatment.” Exhibit 9 (Clarion Website) at 1. The MRP website similarly promotes the Bela MD System as an “[a]dvanced [s]kin [h]ealth [p]latform.” Exhibit 10 (MRP Website) at 1.</p>
<p>(a) a console including a manifold,</p>	<p>The Bela MD comprises a console including a manifold.</p> <p>The image below shows the Bela MD System with a console that includes an internal manifold.</p> <div data-bbox="535 961 1307 1738" style="text-align: center;"> </div> <p>Exhibit 10 at 1; <i>see also</i> Exhibit 8 at 1 (also showing console with manifold); Exhibit 9 at 1 (same).</p>

<p>(a)(i) the manifold being in fluid communication with a first fluid container and at least a second fluid container,</p>	<p>The manifold of the Bela MD System is in fluid communication with a first fluid container and at least a second fluid container.</p> <p>The image below shows that the Bela MD System includes a manifold being in fluid communication with a first fluid container and at least a second fluid container:</p>  <p>Exhibit 10 (MRP Website) at 1; <i>see also</i> Exhibit 8 (Luvo Website) at 1 (also showing console with manifold); Exhibit 9 at 1 (Clarion Website) (same). The Clarion website describes the Aqua handpiece function of the Bela MD System as “a closed looped system” where “BELA MD bio-infusion serum or hydrogen water is emitted from the central aperture of the Aqua tip and infused into the skin along the contact path.” Exhibit 9 at 2. Because the Bela MD System is a “closed loop system,” the serum emitted from the Bela MD System handpiece can be fluid from the first fluid container or the second fluid container, which are connected to the console via the manifold.</p>
<p>(a)(ii) the first fluid container and the at least the second fluid container being configured to contain</p>	<p>The first fluid container and the at least the second fluid container of the Bela MD System are configured to contain a treatment material for a skin treatment procedure, wherein the treatment material comprises a liquid.</p>

<p>a treatment material for a skin treatment procedure, wherein the treatment material comprises a liquid;</p>	<p>Luvo advertises “customizable treatment options and targeted serum solutions” as part of its “comprehensive system [that] helps treat and protect against common skin concerns.” Exhibit 8 at 2. Clarion advertises its Bela MD System as combining “the latest serum innovations and aesthetic technologies to address a variety of skin conditions and improve overall skin quality.” Exhibit 9 at 1. Clarion also describes the use of its serums with the “Aqua handpiece,” stating that “BELA MD bio-infusion serum or hydrogen water is emitted from the central aperture of the Aqua tip and infused into the skin along the contact path. Remaining solution dissolves any impurities, then exits through the waste inlet port.” <i>Id.</i> at 2.</p>
<p>(b) a handpiece assembly comprising a tip, the tip being configured to contact a skin surface of a subject;</p>	<p>The Bela MD System has a handpiece assembly comprising a tip, with the tip being configured to contact a skin surface of a subject.</p> <p>The Luvo, Clarion, and MRP websites show the Bela MD System with a handpiece assembly:</p> <div data-bbox="511 913 1258 1690" style="text-align: center;"> </div> <p>Exhibit 10 at 1. The Clarion website explains that the Bela MD System has a “Aqua handpiece and Aqua tip.” Exhibit 9 at 2. The Bela MD System’s aqua handpiece and aqua tip form “a closed loop system,” where “BELA MD bio-infusion serum or hydrogen water is emitted from the central aperture of the Aqua tip and infused into the skin along</p>

the contact path.”

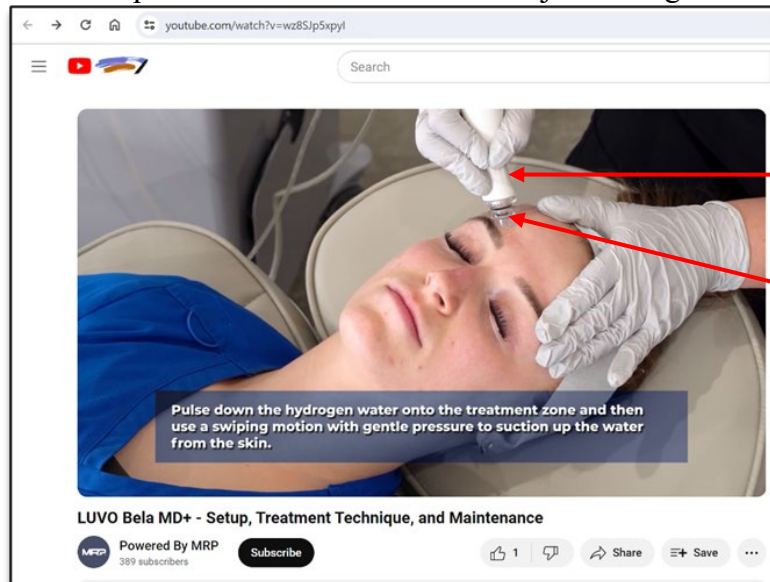
Infusion with Aqua handpiece and Aqua tip

The Aqua handpiece is a closed looped system. BELA MD bio-infusion serum or hydrogen water is emitted from the central aperture of the Aqua tip and infused into the skin along the contact path. Remaining solution dissolves any impurities, then exits through the waste inlet port. The BELA MD+ touchscreen interface allows for easy and precise adjustments of vacuum & flow levels.



Id.

The MRP setup, operation, and maintenance video instructs the user of the Bela MD System to couple the tip to the handpiece assembly, and have the tip contact a skin surface of a subject during a skin treatment.



Handpiece Assembly

Tip

Exhibit 12 at 2.

(c) a supply conduit placing the manifold of the console in fluid communication with the handpiece assembly, wherein the distal end of the supply conduit is configured to couple to the handpiece assembly;

The Bela MD System comprises a supply conduit placing the manifold of the console in fluid communication with the handpiece assembly, wherein the distal end of the supply conduit is configured to couple to the handpiece assembly.

As explained above, the manifold is in fluid communication with a first fluid container and at least a second fluid container when the first fluid container and at least a second fluid container are connected to the console. *See* limitation 1[a][i], *supra*.

As shown in the image below, the Bela MD System comprises a supply conduit placing the manifold of the console in fluid communication with the handpiece assembly and coupling the distal end of the supply conduit to the handpiece assembly.

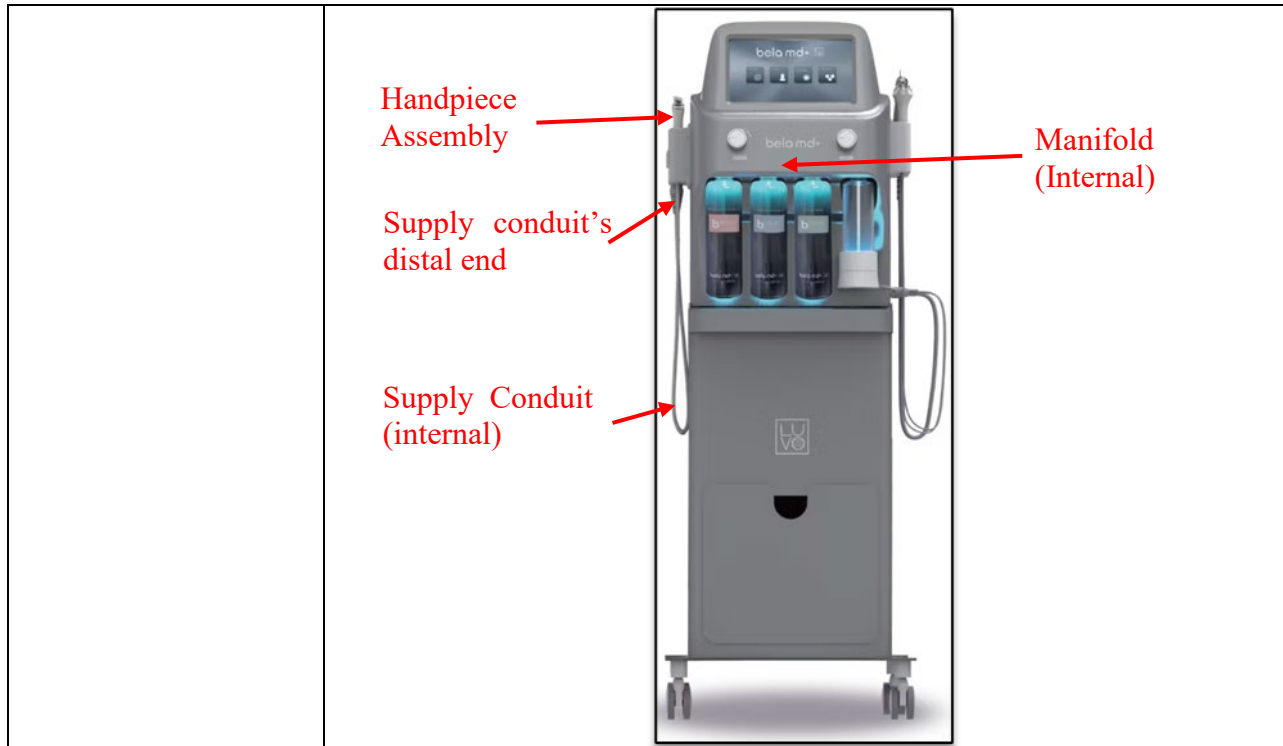


Exhibit 10 at 1.

Luvo’s brochure advertises the Bela MD System’s aqua handpiece as having serum infused “through the aqua tip while it simultaneously removes waste with radial rotation and vacuum suction.”

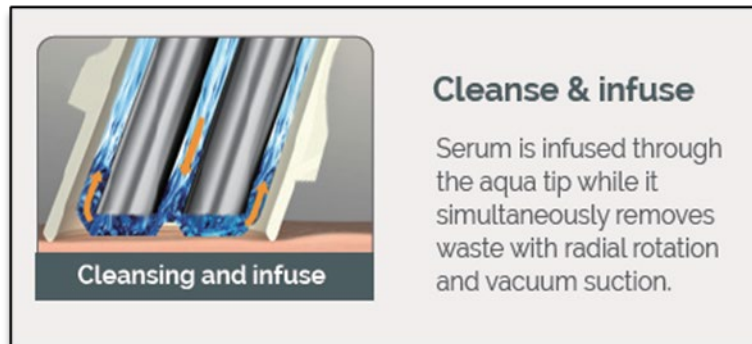
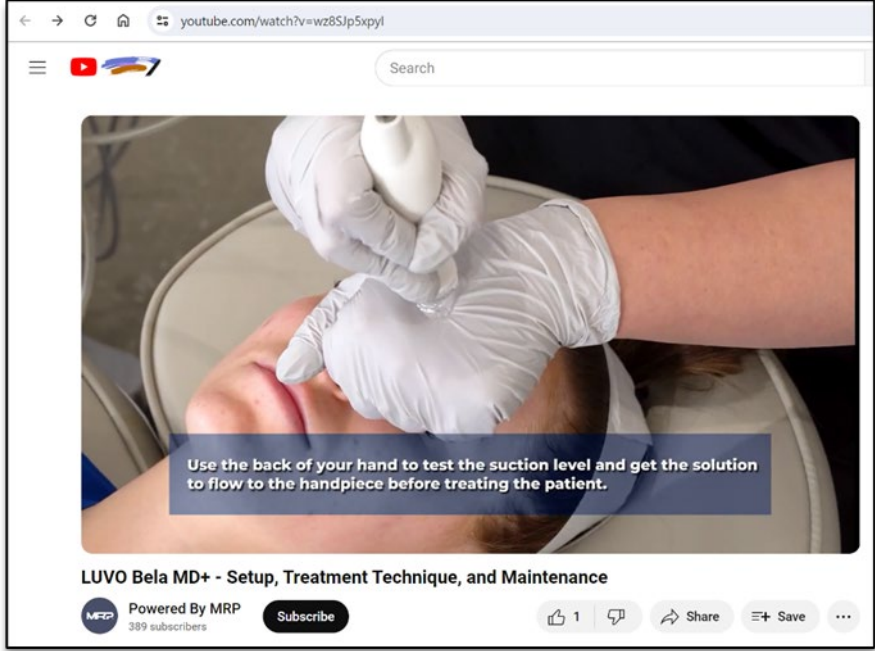


Exhibit 11 at 4.

The MRP setup, operation, and maintenance video shows that the manifold of the console in fluid communication with the handpiece assembly via a supply conduit. For example, the user can select to turn on the vacuum source and place the tip of the handpiece assembly against the skin, causing the Bela MD System to draw fluid from the manifold through the supply conduit to the handpiece assembly.

	 <p>Exhibit 12 at 3. For fluid to be delivered to the tip of the handpiece assembly, the distal end of the supply conduit is configured to couple to the handpiece assembly. If the distal end of the supply conduit did not couple to the handpiece assembly, fluid would not flow through the handpiece assembly and be delivered to the tip of the handpiece assembly.</p>
<p>(d) wherein the manifold is configured to control a flow of treatment material from the first fluid container and at least the second fluid container through the supply conduit;</p>	<p>The manifold of the Bela MD System is configured to control a flow of treatment material from the first fluid container and at least the second fluid container through the supply conduit.</p> <p>As explained above, the user is instructed to connect each of the first fluid container, the at least the second fluid container, and the handpiece assembly to the console. <i>See</i> limitations 1[a][i] and 1[b], <i>supra</i>. As also explained above, manifold of the Bela MD System is in fluid communication with a first fluid container and at least a second fluid container, as well as a handpiece assembly via a supply conduit. <i>See</i> limitations 1[a][i] and [c], <i>supra</i>.</p>

The Clarion website states that the Bela MD System’s touchscreen interface “allows for easy and precise adjustments of vacuum *and flow* levels.” (emphasis added).



Exhibit 9 at 2.

The MRP setup, operation, and maintenance video shows that the user can adjust the intensity of the vacuum and place the tip of the handpiece assembly against the skin, causing the Bela MD System to draw fluid from the manifold to the handpiece assembly via the supply conduit. The video also shows that the user can twist a “Flow” knob that controls the amount of fluid from the fluid containers to the handpiece.

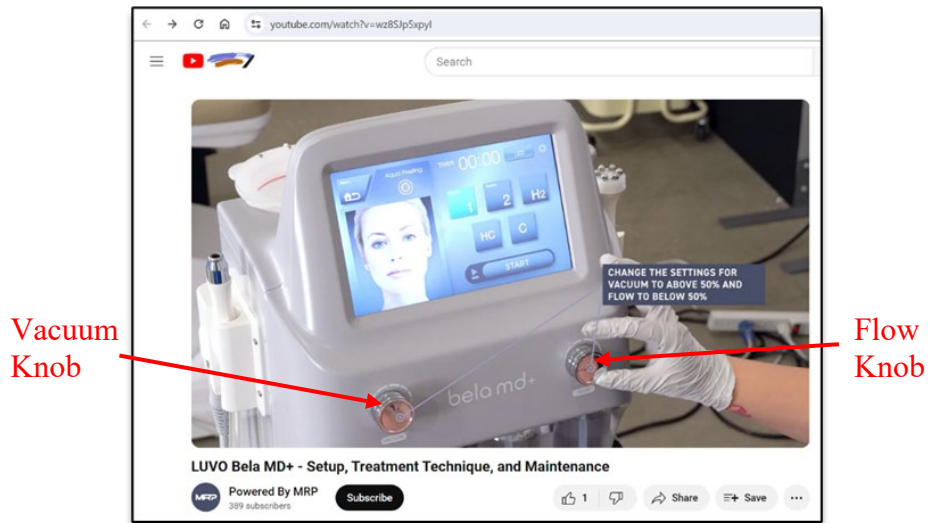


Exhibit 12 at 4. As shown below, a user can select a container using the buttons identified below, indicating the system is configured to control a flow of a treatment fluid contained in the first fluid container and the at least the second container to the handpiece assembly through the supply conduit via the manifold.



Exhibit 12 at 2.

(e) a vacuum source;

The Bela MD System comprises a vacuum source.

The Clarion website indicates that the Bela MD System has a vacuum source, as the Bela MD System “allows for easy and precise adjustments of vacuum and flow levels.” **Exhibit 9** at 2.

Similarly, the Luvo website states that the Bela MD System’s “Aqua Cleansing handpiece” simultaneously cleanses and removes waste and debris “through strong radial rotation paired with vacuum suction.” **Exhibit 8** at 2.

(f) a waste conduit in fluid communication with the tip of the handpiece assembly to remove waste away from a skin surface of a subject during a skin treatment procedure, wherein the waste conduit is operatively coupled to the vacuum source; and

The Bela MD System comprises a waste conduit in fluid communication with the tip of the handpiece assembly to remove waste away from a skin surface of a subject during a skin treatment procedure, wherein the waste conduit is operatively coupled to the vacuum source.

The Clarion website indicates that the handpiece assembly draws spent treatment material and waste away from the skin through the waste conduit via a “waste inlet port.”



Exhibit 9 at 2.

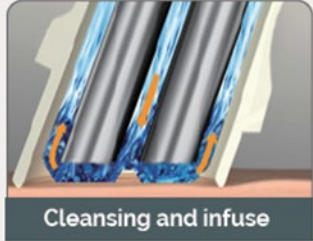
	<p>Luvo’s brochure advertises the Bela MD System’s aqua handpiece as having serum infused “through the aqua tip while it simultaneously removes waste with radial rotation and vacuum suction.”</p> <div data-bbox="625 401 1310 711" style="border: 1px solid black; padding: 10px;">  <p style="text-align: center;">Cleansing and infuse</p> <p style="text-align: right;">Cleanse & infuse</p> <p style="text-align: right;">Serum is infused through the aqua tip while it simultaneously removes waste with radial rotation and vacuum suction.</p> </div> <p>Exhibit 11 at 4. This removal of waste occurs via a waste conduit in fluid communication with the tip of the handpiece assembly.</p>
<p>(g) wherein the system is configured to permit a user to select the treatment material from the first fluid container or the at least second fluid container to be delivered through the supply conduit to the handpiece assembly; and</p>	<p>The Bela MD System is configured to permit a user to select the treatment material from the first fluid container or the at least second fluid container to be delivered through the supply conduit to the handpiece assembly.</p> <p>As explained above, the first fluid container and the at least second fluid container contain treatment material and are connected to the console. <i>See</i> limitations 1[a][i] and [a][ii], <i>supra</i>. As also explained above, the manifold of the Bela MD System is in fluid communication with a first fluid container and at least a second fluid container, as well as a handpiece assembly via a supply conduit. <i>See</i> limitations 1[a][i] and [c], <i>supra</i>.</p> <p>As shown in the MRP setup, operation, and maintenance video, the Bela MD System is configured to permit a user to select the treatment material from the first fluid container or the at least second fluid container to be delivered through the supply conduit to the handpiece assembly using the buttons identified below.</p>


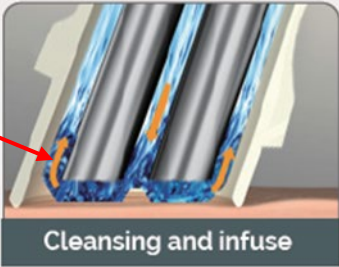


Exhibit 12 at 2.

(h) wherein, when the vacuum source is activated and the tip contacts the skin surface, a suction force is created within the waste conduit and along the tip, thereby removing waste from the skin surface via the waste conduit while drawing treatment material from the first fluid container or the second fluid container to the tip via the supply conduit.

When the vacuum source of the Bela MD System is activated and the tip contacts the skin surface, a suction force is created within the waste conduit and along the tip, thereby removing waste from the skin surface via the waste conduit while drawing treatment material from the first fluid container or the second fluid container to the tip via the supply conduit.

As explained above, the Bela MD System comprises (a) a vacuum source, (b) a tip of the handpiece assembly configured to contact a skin surface of a subject, and (c) a waste conduit in fluid communication with the tip of the handpiece assembly to remove waste away from a skin surface of a subject during a skin treatment procedure. See limitations 1[b], 1[e], and 1[f], *supra*. As shown below, the vacuum source creates a suction force that removes waste from the skin surface via the waste conduit while drawing treatment material from the first fluid container or the second fluid container to the tip via the supply conduit.

	<p>Luvo advertises that the Bela MD System “delivers targeted Bio-infusion serum through the center of the tip, <i>simultaneously</i> cleansing and removing waste and debris.” Exhibit 8 at 2 (emphasis added). To accomplish this, the Bela MD System uses “strong radial rotation paired with vacuum suction.”</p> <div data-bbox="532 474 1110 938" style="border: 1px solid black; padding: 10px; margin: 10px 0;">  <p>Aqua cleansing & exfoliation</p> <p>BELA'S Aqua Cleansing handpiece delivers targeted Bio-infusion serum through the center of the tip, simultaneously cleansing and removing waste and debris through strong radial rotation paired with vacuum suction. The level of exfoliation can be customized to suit treatment needs.</p> </div> <p><i>Id.</i></p> <p>Luvo’s brochure advertises the Bela MD System’s aqua handpiece as having serum infused “through the aqua tip while it simultaneously removes waste with radial rotation and vacuum suction.”</p> <div data-bbox="516 1140 1268 1482" style="border: 1px solid black; padding: 10px; margin: 10px 0;">  <p>Cleanse & infuse</p> <p>Serum is infused through the aqua tip while it simultaneously removes waste with radial rotation and vacuum suction.</p> </div> <p>Exhibit 11 at 4.</p>
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Suction Force Along Tip

52. Each of the Defendants Luvo, Clarion, MRP, and Eunsung are liable under 35 U.S.C. § 271(b) for actively inducing others to infringe the '052 Patent because, among other things, each of the Defendants has marketed, sold, and offered for sale, and continues to market, sell, and offer for sale, the accused hydrodermabrasion products and components thereof

knowing and intending that such hydrodermabrasion products would be assembled or used by customers and end users in a manner that infringes at least Claim 1 of the '052 Patent. *See Exhibits 8–11*. For example, upon information and belief, Defendants Luvo and Clarion provided and provide instructions and information to its customers and end users of the accused hydrodermabrasion products and components thereof, encouraging assembly and use of the accused hydrodermabrasion products and components thereof in a manner that infringes the '052 Patent. *See* <https://luvomedical.com/about-luvo/> (last visited July 2, 2024) (**Exhibit 20**) (“We work with passionate physicians who share in our goal, and provide the support, training and resources they need to grow their practices and provide the best in patient care.”); <https://www.clarionmedical.com/services/clinical-training> (last visited July 2, 2024) (**Exhibit 21**) (“We provide an integrated approach to clinical education, from demonstration to in-service training, not only on the technical aspects of your system but on procedure and best practices.”). Similarly, Defendant MRP provided and provides instructions and information to its customers and end users of the accused hydrodermabrasion products and components thereof, encouraging assembly and use of the accused hydrodermabrasion products and components thereof in a manner that infringes the '052 Patent. *See Exhibits 12 and 13*. Upon information and belief, Defendant Eunsung provided and provides instructions and information to its customers and end users of the accused hydrodermabrasion products and components thereof, encouraging assembly and use of the accused hydrodermabrasion products and components thereof in a manner that infringes the '052 Patent.

53. Further, customers and users have assembled and/or used the accused hydrodermabrasion products and components thereof in a manner that infringes the '052 Patent

(and continue to do so). *See Exhibits 12 and 13* (providing training and explanation videos for use of the Bela MD System).

54. Each of the Defendants Luvo, Clarion, MRP, and Eunsung is liable for contributory infringement under 35 U.S.C. § 271(c) because, among other things, each of the Defendants has sold or offered for sale, and continues to sell and/or offers for sale within the United States and/or has imported and continues to import into the United States, the accused hydrodermabrasion products and components thereof constituting material parts of the invention of at least Claim 1 of the '052 Patent, that are not staple articles or commodities of commerce suitable for substantial non-infringing use. *See supra*; **Exhibits 8–14**. Each of the Defendants has and continues to so act, knowing that the accused hydrodermabrasion products and components thereof are especially made for or adapted for use in an infringement of the '052 Patent. *See Exhibits 12 and 13*. Further, customers and users have assembled and/or used the accused hydrodermabrasion products and components thereof in a manner that infringes the '052 Patent (and continue to do so). *See Exhibits 12 and 13* (providing training and explanation videos for use of the Bela MD System).

55. As a direct and proximate result of Defendants' acts of infringement, each of the Defendants has derived and received gains, profits, and advantages. Plaintiff has been damaged by each of the Defendants' activities, in an amount to be determined at trial, but in no event less than a reasonable royalty.

56. Each of the Defendant's infringement has been and continues to be willful. Pursuant to 35 U.S.C. § 284, Plaintiff is entitled to damages for Defendants' infringing acts and treble damages together with interests and costs as fixed by this Court.

57. This is an exceptional case. Pursuant to 35 U.S.C. § 285, Plaintiff is entitled to reasonable attorneys’ fees for the necessity of bringing this action.

58. Due to the aforesaid infringing acts, Plaintiff has suffered irreparable injury, for which Plaintiff has no adequate remedy at law.

59. Unless enjoined by this Court, each of the Defendants will continue to infringe Plaintiff’s patent rights and cause Plaintiff further irreparable injury.

V. COUNT II

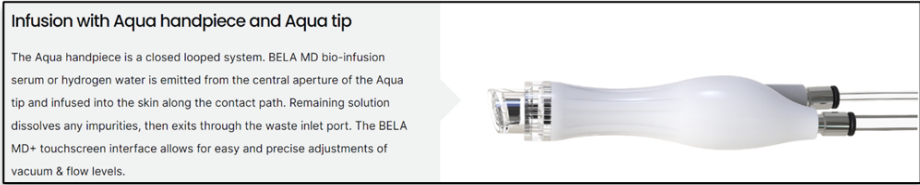
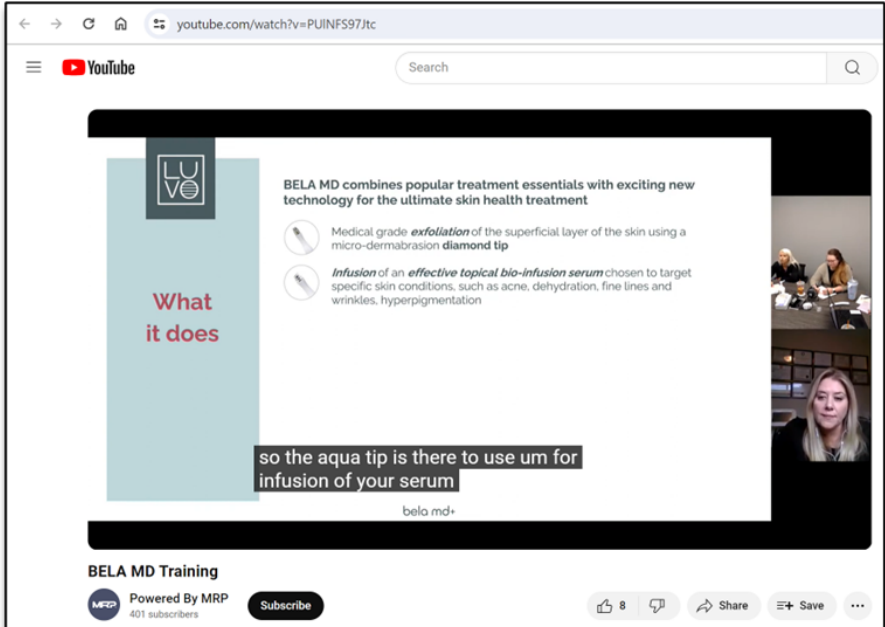
INFRINGEMENT OF THE ’641 PATENT

60. Plaintiff incorporates by reference and realleges each of the allegations set forth in Paragraphs 1-59 above.

61. Each of the Defendants knowingly and intentionally infringed the ’641 Patent in violation of 35 U.S.C. § 271(a) through, for example, the use, sale, offer for sale, and/or importation into the United States tips associated with the Bela MD System during the term of the ’641 Patent. Defendant Eunsung has made, used, offered for sale, sold, and imported into the United States the infringing Bela MD System. Defendants Luvo and Clarion have used, offered for sale, sold, and imported into the United States the infringing tips for the Bela MD System. Defendant MRP has used, offered for sale, sold, and imported into the United States the infringing tips for the Bela MD System.

62. For example, as set forth in the claim chart below, the tips for use with the Bela MD System infringe at least Claim 1 of the ’641 Patent.

Claim Language	Bela MD System
1. A tip configured for use in a skin treatment system,	Each of the tips for use with the Bela MD System is a tip configured for use in a skin treatment system.

<p>comprising:</p>	<p>The Clarion website explains that the Bela MD System has a “Aqua handpiece and Aqua tip.” Exhibit 9 at 2. The Bela MD System’s aqua handpiece and aqua tip form “a closed loop system,” where “BELA MD bio-infusion serum or hydrogen water is emitted from the central aperture of the Aqua tip and infused into the skin along the contact path.”</p>  <p><i>Id.</i> The MRP website lists that one of the key features of the Bela MD System is its “[i]nfusion with Aqua handpiece and Aqua tip.” Exhibit 9 at 2. MRP sells the Bela MD System with Aqua tips. <i>Id.</i></p> <p>The MRP training video for the Bela MD System instructs the user to use a tip with the Bela MD System.</p>  <p>Exhibit 13 at 1.</p>
<p>(a) a tip body extending from a proximal end to a distal end of the tip, the proximal end being configured to couple to a handpiece</p>	<p>Each of the tips for use with the Bela MD System has a tip body extending from a proximal end to a distal end of the tip, the proximal end being configured to couple to a handpiece assembly.</p> <p>Clarion advertises the Bela MD System as configured to couple to a tip that includes a tip body extending from a proximal end to a distal end of the tip. The proximal end is configured to couple to the handpiece</p>

assembly;

assembly of the Bela MD System.

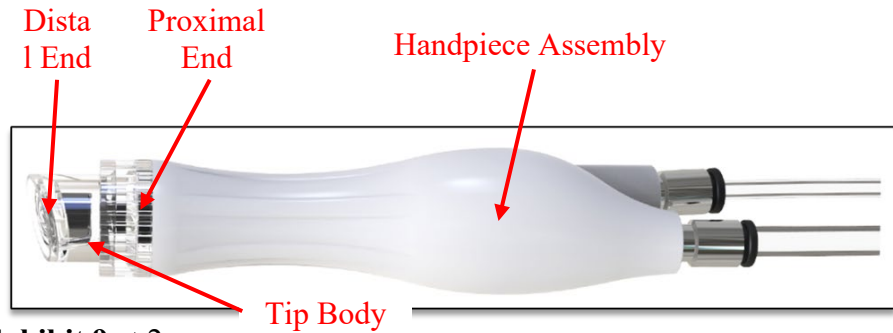


Exhibit 9 at 2.

The MRP setup, operation, and maintenance video for the Bela MD System instructs the user to couple the proximal end of the tip with the handpiece assembly of the Bela MD System.

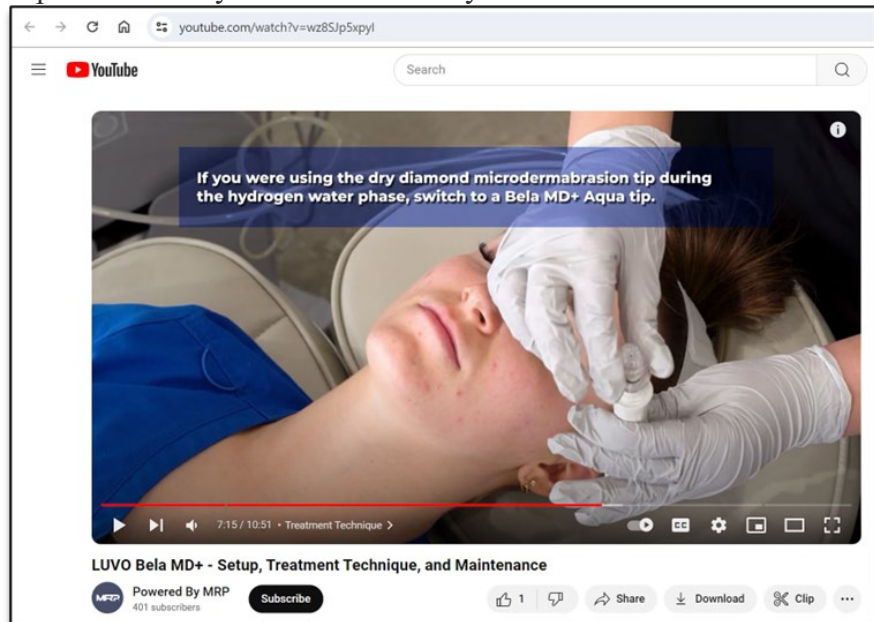


Exhibit 12 at 6.

[b] at least one first passage extending through an interior of the tip body and configured to receive a fluid and to deliver said fluid to the distal end of the tip;

Each of the tips for use with the Bela MD System has at least one first passage extending through an interior of the tip body and configured to receive a fluid and to deliver said fluid to the distal end of the tip.

Luvo advertises that the Bela MD System “delivers targeted Bio-infusion serum *through the center of the tip*, simultaneously cleansing and removing waste and debris.”

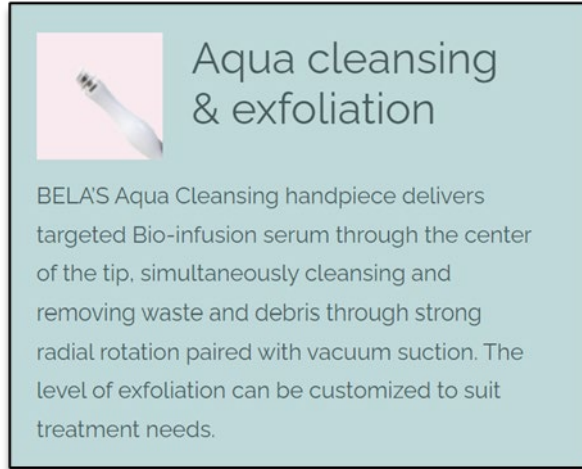


Exhibit 8 at 2 (emphasis added).

Luvo’s brochure advertises the Bela MD System’s aqua handpiece as having serum infused “through the aqua tip while it simultaneously removes waste with radial rotation and vacuum suction.” As shown in the image below, the serum is infused through the aqua tip to the distal end of the tip via at least one first passage extending through an interior of the tip body.

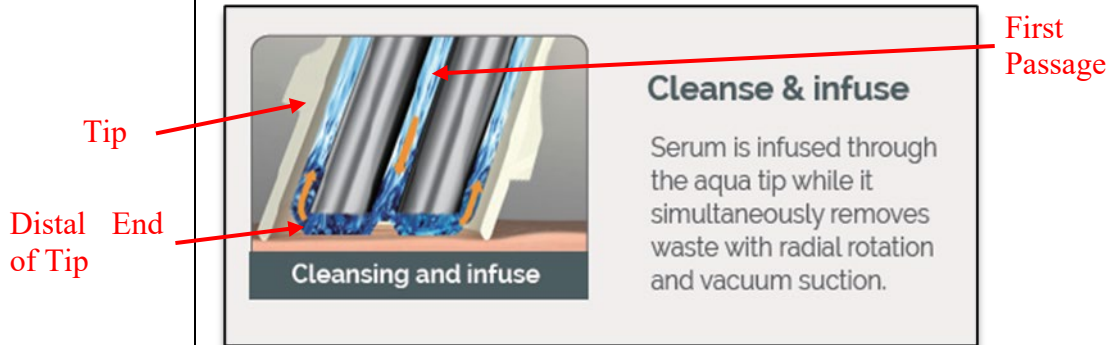


Exhibit 11 at 4.

The MRP training video for the Bela MD System shows the delivering of a fluid to the distal end of a tip for use with the Bela MD System via a passage extending through an interior of the tip body.

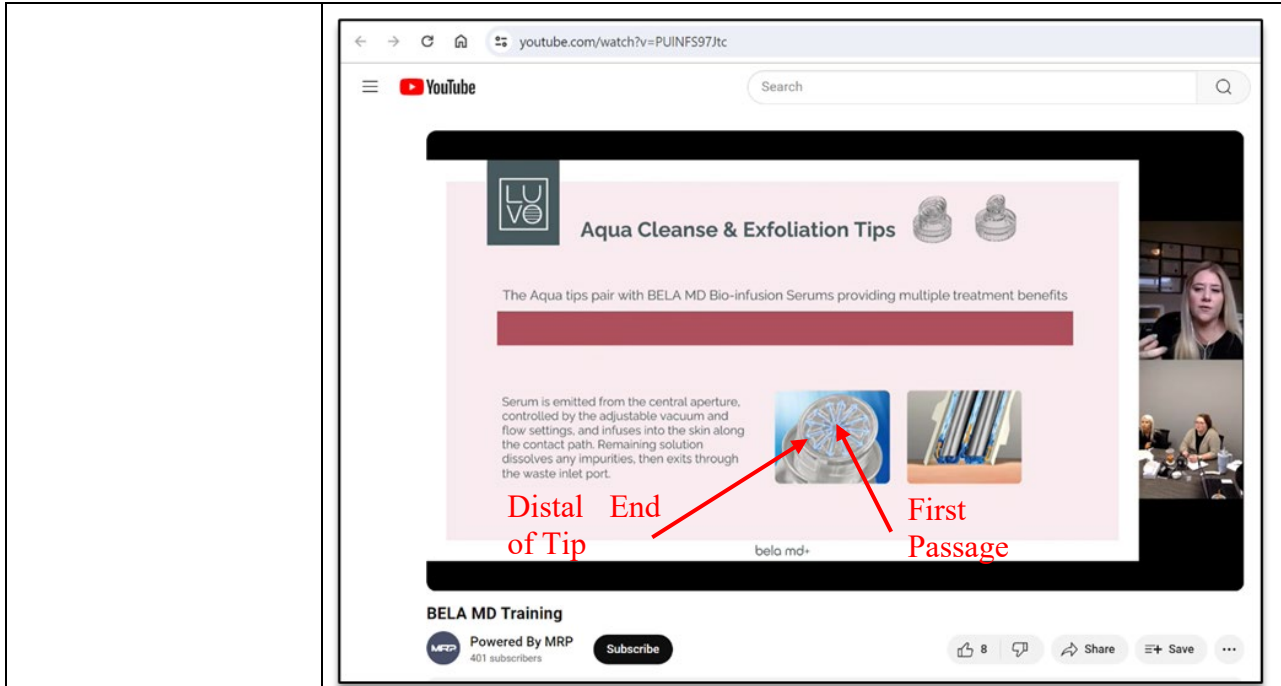
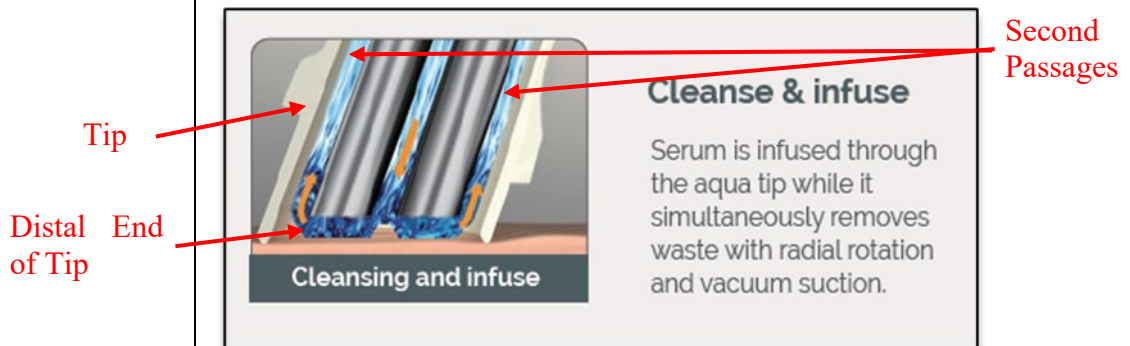


Exhibit 13 at 2.

(c) at least one second passage extending through an interior of the tip body and configured to convey fluid and debris away from the distal end of the tip;

Each of the tips for use with the Bela MD System has at least one second passage extending through an interior of the tip body and configured to convey fluid and debris away from the distal end of the tip.

Luvo’s brochure advertises the Bela MD System’s aqua handpiece as having serum infused “through the aqua tip while it *simultaneously removes waste with radial rotation and vacuum suction.*” Exhibit 11 at 4 (emphasis added). As shown in the image below, the waste is conveyed away from the distal end of the tip via at least one second passage extending through an interior of the tip body.



Id.

(d) an outer member defining a periphery along the distal end, the outer member being configured to contact skin during a treatment procedure; and

Each of the tips for use with the Bela MD System has an outer member defining a periphery along the distal end, with the outer member being configured to contact skin during a treatment procedure.

The MRP training video for the Bela MD System shows an outer member defining a periphery along the distal end of the tip.

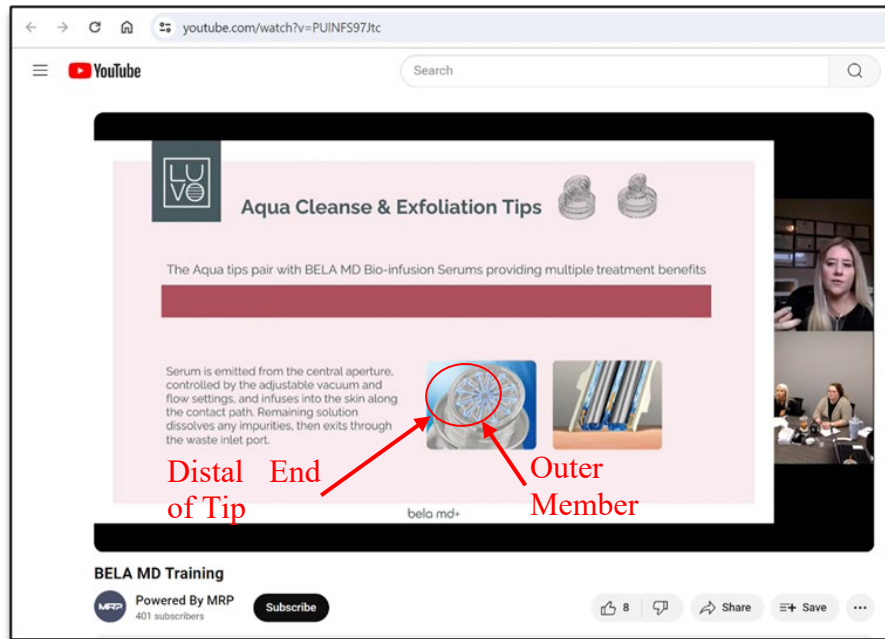


Exhibit 13 at 2. The MRP setup, operation, and maintenance video for the Bela MD System instructs a user to contact skin during a treatment procedure with the outer member of the tip.



	<p>Exhibit 12 at 2.</p>
<p>[e] at least one inner member located within an inner area of the outer member, wherein the at least one inner member comprises a spiral-like pattern;</p>	<p>Each of the tips for use with the Bela MD System has at least one inner member located within an inner area of the outer member, wherein the at least one inner member comprises a spiral-like pattern.</p> <p>The Clarion and MRP websites advertises the Bela MD System having a tip with at least one inner member located within an inner area of the outer member, wherein the at least one inner member comprises a spiral-like pattern.</p> <div data-bbox="516 701 1195 1121" data-label="Image"> </div> <p>Exhibit 9 at 2; <i>see also Exhibit 10</i> (same image in a different window).</p>
<p>(f) wherein the at least one inner member is configured to abrade skin.</p>	<p>Each of the tips for use with the Bela MD System has at least one inner member, wherein the at least one inner member is configured to abrade skin.</p> <p>Luvo advertises that its Aqua handpiece performs “cleansing and exfoliation.” Exhibit 8 at 2. In the MRP training video, the trainer refers to the “pie regions and skin contact regions” as performing “additional exfoliation.” Exhibit 13 at 35:30. Thus, the inner member(s) of the tips for use with the Bela MD System are configured to abrade skin.</p>

63. Each of the Defendants Luvo, Clarion, MRP, and Eunsung are liable under 35 U.S.C. § 271(b) for actively inducing others to infringe the '641 Patent because, among other things, each of the Defendants has marketed, sold, and offered for sale, and continues to market,

sell, and offer for sale, the accused hydrodermabrasion products and components thereof knowing and intending that such hydrodermabrasion products would be assembled or used by customers and end users in a manner that infringes at least Claim 1 of the '641 Patent. *See Exhibits 8–11*. To that end, upon information and belief, Defendants Luvo and Clarion provided and provides instructions and information to its customers and end users of the accused hydrodermabrasion products and components thereof, encouraging assembly and use of the accused hydrodermabrasion products and components thereof in a manner that infringes the '641 Patent. *See Exhibit 20* (“We work with passionate physicians who share in our goal, and provide the support, training and resources they need to grow their practices and provide the best in patient care.”); *Exhibit 21* (“We provide an integrated approach to clinical education, from demonstration to in-service training, not only on the technical aspects of your system but on procedure and best practices.”). Similarly, Defendant MRP provided and provides instructions and information to its customers and end users of the accused hydrodermabrasion products and components thereof, encouraging assembly and use of the accused hydrodermabrasion products and components thereof in a manner that infringes the '641 Patent. *See Exhibits 12 and 13*. Upon information and belief, Defendant Eunsung provided and provides instructions and information to its customers and end users of the accused hydrodermabrasion products and components thereof, encouraging assembly and use of the accused hydrodermabrasion products and components thereof in a manner that infringes the '641 Patent.

64. Further, customers and users have assembled and/or used the accused hydrodermabrasion products and components thereof in a manner that infringes the '641 Patent (and continue to do so). *See Exhibits 12 and 13* (providing training and explanation videos for

tips for use with the Bela MD System).

65. Each of the Defendants Luvo, Clarion, MRP, and Eunsung is liable for contributory infringement under 35 U.S.C. § 271(c) because, among other things, each of the Defendants has sold or offered for sale, and continues to sell and/or offers for sale within the United States and/or has imported and continues to import into the United States, the accused hydrodermabrasion products and components thereof constituting material parts of the invention of at least Claim 1 of the '641 Patent, that are not staple articles or commodities of commerce suitable for substantial non-infringing use. *See supra*; **Exhibits 8–14**. Each of the Defendants has and continues to so act, knowing that the accused hydrodermabrasion products and components thereof are especially made for or adapted for use in an infringement of the '641 Patent. *See Exhibits 12 and 13*. Further, customers and users have assembled and/or used the accused hydrodermabrasion products and components thereof in a manner that infringes the '641 Patent (and continue to do so). *See Exhibits 12 and 13* (providing training and explanation videos for tips for use with the Bela MD System).

66. As a direct and proximate result of each of Defendants' acts of infringement, each of the Defendants has derived and received gains, profits, and advantages. Plaintiff has been damaged by each of the Defendant's activities, in an amount to be determined at trial, but in no event less than a reasonable royalty.

67. Each of the Defendant's infringement has been and continues to be willful. Pursuant to 35 U.S.C. § 284, Plaintiff is entitled to damages for Defendants' infringing acts and treble damages together with interests and costs as fixed by this Court.

68. This is an exceptional case. Pursuant to 35 U.S.C. § 285, Plaintiff is entitled to

reasonable attorneys’ fees for the necessity of bringing this action.

69. Due to the aforesaid infringing acts, Plaintiff has suffered irreparable injury, for which Plaintiff has no adequate remedy at law.

70. Unless enjoined by this Court, each of the Defendants will continue to infringe Plaintiff’s patent rights and cause Plaintiff further irreparable injury.

VI. COUNT III

INFRINGEMENT OF THE ’642 PATENT

71. Plaintiff incorporates by reference and realleges each of the allegations set forth in Paragraphs 1-70 above.

72. Each of the Defendants knowingly and intentionally infringed the ’642 Patent in violation of 35 U.S.C. § 271(a) through, for example, the use, sale, offer for sale, and/or importation into the United States tips associated with the Bela MD System during the term of the ’642 Patent. Defendant Eunsung has made, used, offered for sale, sold, and imported into the United States the infringing Bela MD System. Defendants Luvo and Clarion have used, offered for sale, sold, and imported into the United States the infringing tips for the Bela MD System. Defendant MRP has used, offered for sale, sold, and imported into the United States the infringing tips for the Bela MD System.

73. For example, as set forth in the claim chart below, the tips for use with the Bela MD System infringe at least Claim 1 of the ’642 Patent.

Claim Language	Bela MD System
1. A tip configured for use in a skin treatment system, comprising:	<p>Each of the tips for use with the Bela MD System is a tip configured for use in a skin treatment system.</p> <p>The Clarion website explains that the Bela MD System has a “Aqua handpiece and Aqua tip.” Exhibit 9 at 2. The Bela MD System’s aqua</p>

handpiece and aqua tip form “a closed loop system,” where “BELA MD bio-infusion serum or hydrogen water is emitted from the central aperture of the Aqua tip and infused into the skin along the contact path.”



Id. The MRP website lists that one of the key features of the Bela MD System is its “[i]nfusion with Aqua handpiece and Aqua tip.” **Exhibit 10** at 2. MRP sells the Bela MD System with Aqua tips. *Id.*

The MRP training video for the Bela MD System instructs the user to use a tip with the Bela MD System.

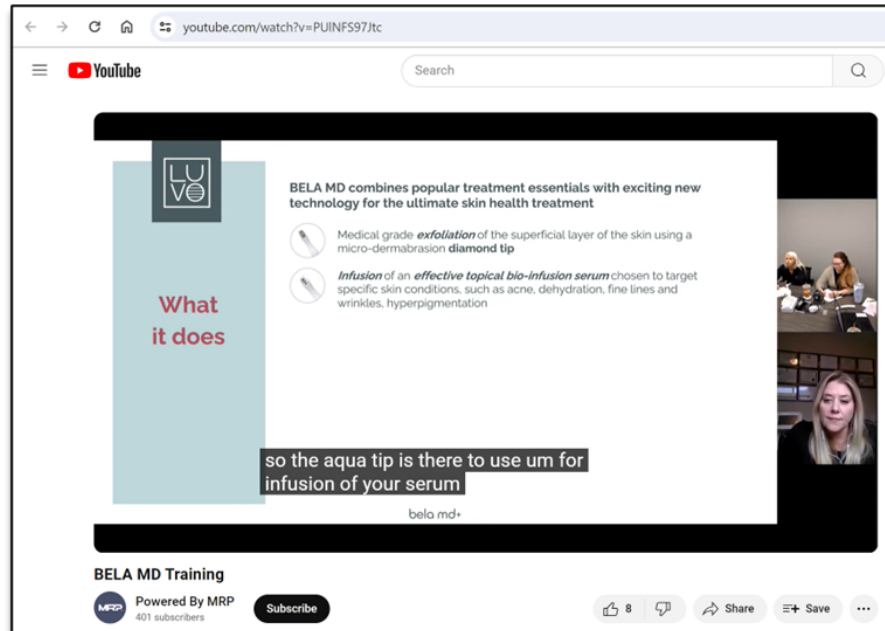

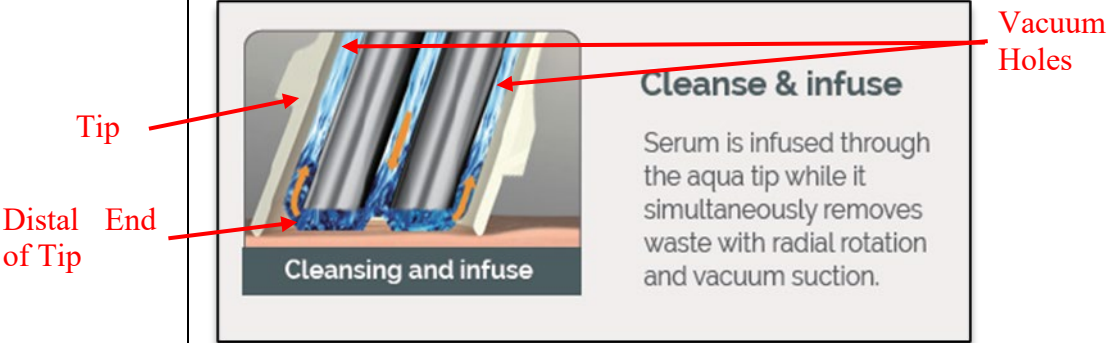


Exhibit 13 at 1.

(a) a tip body;

Each of the tips for use with the Bela MD System has a tip body.

Clarion advertises the Bela MD System as configured to couple to a tip that includes a tip body.

	 <p>Exhibit 9 at 2.</p>
<p>(b) at least one vacuum hole configured to receive fluid and debris being transferred away from a distal end of the tip body;</p>	<p>Each of the tips for use with the Bela MD System has at least one vacuum hole configured to receive fluid and debris being transferred away from a distal end of the tip body.</p> <p>Luvo’s brochure advertises the Bela MD System’s aqua handpiece as having serum infused “through the aqua tip while it <i>simultaneously removes waste with radial rotation and vacuum suction.</i>” Exhibit 11 at 4 (emphasis added). As shown in the image below, the waste is transferred away from the distal end of the tip via at least one vacuum hole.</p>  <p><i>Id.</i></p>

(c) an outer member defining a periphery along the distal end; and

Each of the tips for use with the Bela MD System has an outer member defining a periphery along the distal end.

The MRP training video for the Bela MD System shows an outer member defining a periphery along the distal end of the tip.

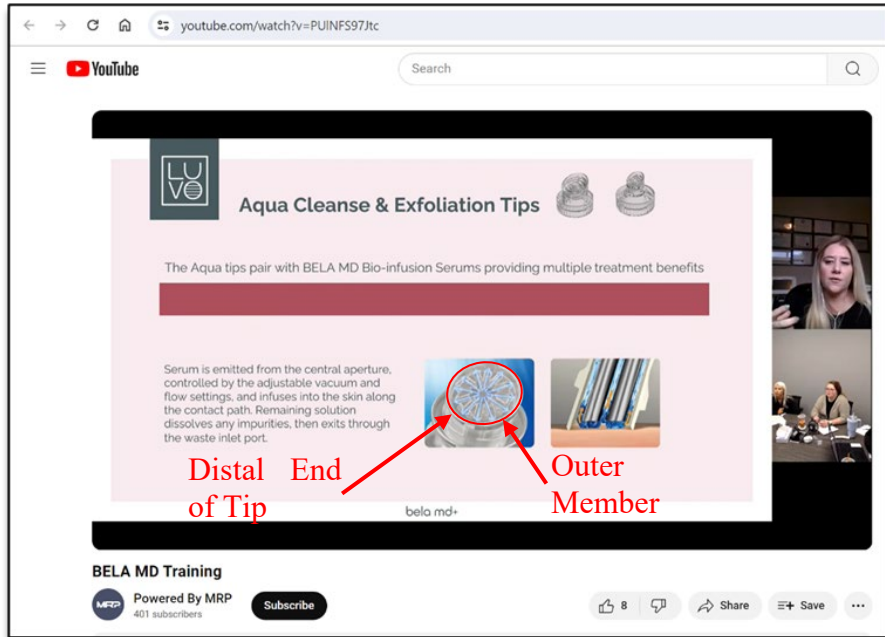
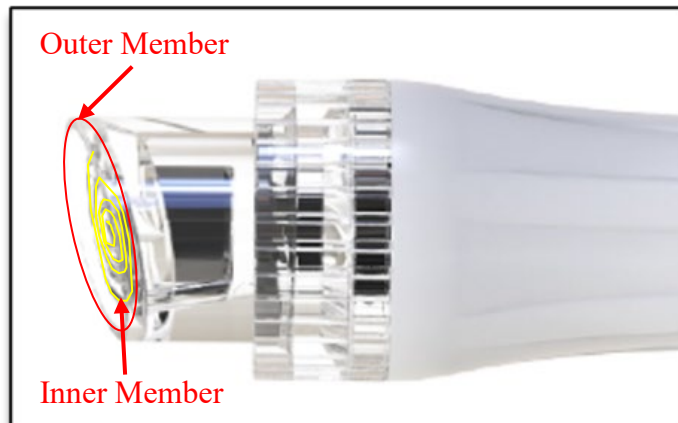


Exhibit 13 at 2.

(d) at least one inner member located within an interior area of the outer member, the at least one inner member being configured to abrade skin;

Each of the tips for use with the Bela MD System has at least one inner member located within an interior area of the outer member, the at least one inner member being configured to abrade skin.

The Clarion and MRP websites advertises the Bela MD System having a tip with at least one inner member located within an inner area of the outer member.



	<p>Exhibit 9 at 2; <i>see also</i> Exhibit 10 (same image in a different window). Luvo advertises that its Aqua handpiece performs “cleansing and exfoliation.” Exhibit 8 at 2. In the MRP training video, the trainer refers to the “pie regions and skin contact regions” as performing “additional exfoliation.” Exhibit 13 at 35:30. Thus, the inner member(s) of the tips for use with the Bela MD System are configured to abrade skin.</p>
<p>(e) wherein the tip body, the outer member and the at least one inner member are monolithically formed;</p>	<p>Each of the tips for use with the Bela MD System has the tip body, the outer member and the at least one inner member monolithically formed.</p> <p>The MRP setup, operation, and maintenance video for the Bela MD System instructs the user to couple the tip (which comprises the tip body, the outer member and the at least one inner member) with the handpiece assembly of the Bela MD System. As shown below, the user couples a single monolithically formed tip to the handpiece:</p>  <p>Exhibit 12 at 6.</p>

(f) wherein a proximal end of the tip is configured to couple to a handpiece assembly; and

Each of the tips for use with the Bela MD System has a proximal end which is configured to couple to a handpiece assembly.

Clarion advertises the Bela MD System as configured to couple to a tip that includes a tip body extending from a proximal end to a distal end of the tip. The proximal end is configured to couple to the handpiece assembly of the Bela MD System.

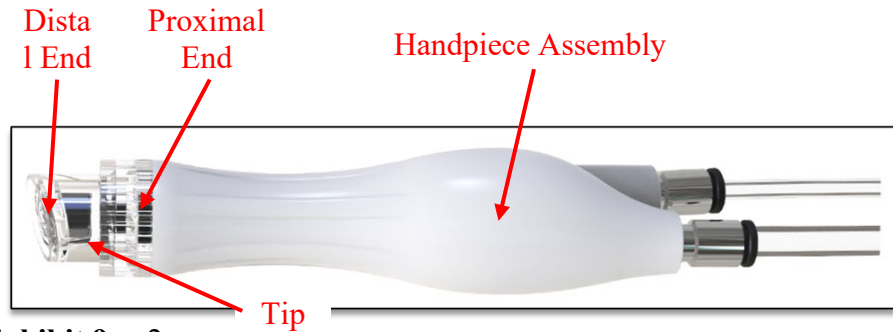


Exhibit 9 at 2.

The MRP setup, operation, and maintenance video for the Bela MD System instructs the user to couple the proximal end of the tip with the handpiece assembly of the Bela MD System.

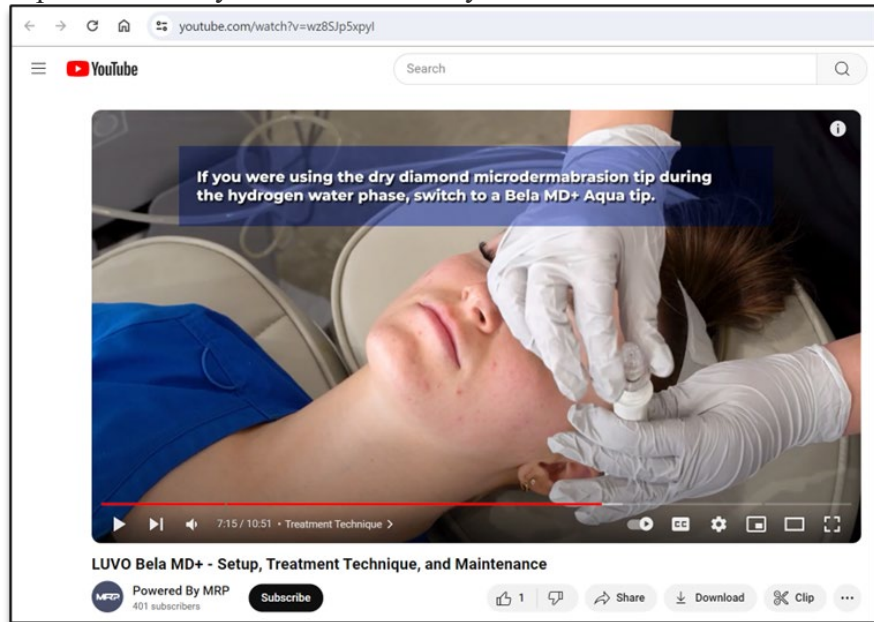
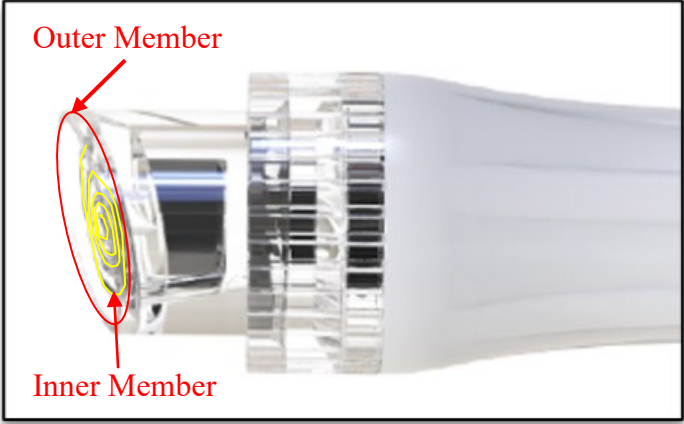


Exhibit 12 at 6.

(g) wherein the at least one inner member comprises a

Each of the tips for use with the Bela MD System has least one inner member that comprises a spiral-like pattern.

<p>spiral-like pattern.</p>	<p>The Clarion and MRP websites advertise the Bela MD System having a tip with at least one inner member located within an inner area of the outer member.</p>  <p>Exhibit 9 at 2; <i>see also</i> Exhibit 10 (same image in a different window).</p>
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74. Each of the Defendants Luvo, Clarion, MRP, and Eunsung are liable under 35 U.S.C. § 271(b) for actively inducing others to infringe the '642 Patent because, among other things, each of the Defendants Luvo, Clarion, MRP, and Eunsung has marketed, sold, and offered for sale, and continues to market, sell, and offer for sale, the accused hydrodermabrasion products and components thereof knowing and intending that such hydrodermabrasion products would be assembled or used by customers and end users in a manner that infringes at least Claim 1 of the '642 Patent. *See Exhibits 8–11*. To that end, upon information and belief, Defendants Luvo and Clarion provided and provides instructions and information to its customers and end users of the accused hydrodermabrasion products and components thereof, encouraging assembly and use of the accused hydrodermabrasion products and components thereof in a manner that infringes the '642 Patent. *See Exhibit 20* (“We work with passionate physicians who share in our goal, and provide the support, training and resources they need to grow their practices and provide the best in patient care.”); *Exhibit 21* (“We provide an integrated approach

to clinical education, from demonstration to in-service training, not only on the technical aspects of your system but on procedure and best practices.”). Similarly, Defendant MRP provided and provides instructions and information to its customers and end users of the accused hydrodermabrasion products and components thereof, encouraging assembly and use of the accused hydrodermabrasion products and components thereof in a manner that infringes the ’642 Patent. *See Exhibits 12 and 13*. Upon information and belief, Defendant Eunsung provided and provides instructions and information to its customers and end users of the accused hydrodermabrasion products and components thereof, encouraging assembly and use of the accused hydrodermabrasion products and components thereof in a manner that infringes the ’642 Patent.

75. Further, customers and users have assembled and/or used the accused hydrodermabrasion products and components thereof in a manner that infringes the ’642 Patent (and continue to do so). *See Exhibits 12 and 13* (providing training and explanation videos for tips for use with the Bela MD System).

76. Each of the Defendants Luvo, Clarion, MRP, and Eunsung is liable for contributory infringement under 35 U.S.C. § 271(c) because, among other things, each of the Defendants Luvo, Clarion, MRP, and Eunsung has sold or offered for sale, and continues to sell and/or offers for sale within the United States and/or has imported and continues to import into the United States, the accused hydrodermabrasion products and components thereof constituting material parts of the invention of at least Claim 1 of the ’642 Patent, that are not staple articles or commodities of commerce suitable for substantial non-infringing use. *See supra*; **Exhibits 8–14**. Each of the Defendants has and continues to so act, knowing that the accused hydrodermabrasion

products and components thereof are especially made for or adapted for use in an infringement of the '642 Patent. *See Exhibits 12 and 13*. Further, customers and users have assembled and/or used the accused hydrodermabrasion products and components thereof in a manner that infringes the '642 Patent (and continue to do so). *See Exhibits 12 and 13* (providing training and explanation videos for tips for use with the Bela MD System).

77. As a direct and proximate result of each of the Defendant's acts of infringement, each of the Defendants has derived and received gains, profits, and advantages. Plaintiff has been damaged by each of the Defendant's activities, in an amount to be determined at trial, but in no event less than a reasonable royalty.

78. Each of the Defendant's infringement has been and continues to be willful. Pursuant to 35 U.S.C. § 284, Plaintiff is entitled to damages for each of the Defendant's infringing acts and treble damages together with interests and costs as fixed by this Court.

79. This is an exceptional case. Pursuant to 35 U.S.C. § 285, Plaintiff is entitled to reasonable attorneys' fees for the necessity of bringing this action.

80. Due to the aforesaid infringing acts, Plaintiff has suffered irreparable injury, for which Plaintiff has no adequate remedy at law.

81. Unless enjoined by this Court, each of the Defendants will continue to infringe Plaintiff's patent rights and cause Plaintiff further irreparable injury.

VII.COUNT IV


INFRINGEMENT OF THE '477 PATENT

82. Plaintiff incorporates by reference and realleges each of the allegations set forth in Paragraphs 1-81 above.

83. Each of the Defendants knowingly and intentionally infringed the '477 Patent in violation of 35 U.S.C. § 271(a) through, for example, the use, sale, offer for sale, and/or importation into the United States of the Bela MD System during the term of the '477 Patent. Defendant Eunsung has made, used, offered for sale, sold, and imported into the United States the infringing Bela MD System. Defendants Luvo and Clarion have used, offered for sale, sold, and imported into the United States the infringing Bela MD System. Defendant MRP has used, offered for sale, sold, and imported into the United States the infringing Bela MD System.

84. For example, as set forth in the claim chart below, the Bela MD System infringes at least Claim 1 of the '477 Patent.

Claim Language	Bela MD System
1. A skin treatment system comprising:	<p>To the extent the preamble is deemed to be a limitation, the Bela MD System is a skin treatment system.</p> <p>The Luvo website refers to the Bela MD System as a “medical skin health platform” that is “designed to provide improvement in primary skin concerns while addressing the overall health and appearance of the skin.” Exhibit 8 (Luvo Website) at 1. The Clarion website calls the Bela MD System an “[a]dvanced [s]kin [h]ealth [p]latform” that provides a “relaxing, non invasive treatment.” Exhibit 9 (Clarion Website) at 1. The MRP website similarly promotes the Bela MD System as an “[a]dvanced [s]kin [h]ealth [p]latform.” Exhibit 10 (MRP Website) at 1.</p>
(a) a manifold system in communication with a first container and at least a second container,	<p>The Bela MD System comprises a manifold system in communication with a first container and at least a second container.</p> <p>The image below shows that the Bela MD System includes a manifold system in communication with a first container and at least a second container.</p>

	 <p>First container</p> <p>Console</p> <p>Manifold system (internal)</p> <p>At least a second container</p> <p>Exhibit 10 at 1; <i>see also</i> Exhibit 8 at 1 (also showing console with manifold system); Exhibit 9 at 1 (same). The Clarion website describes the Aqua handpiece assembly function of the Bela MD System as “a closed looped system” where “BELA MD bio-infusion serum or hydrogen water is emitted from the central aperture of the Aqua tip and infused into the skin along the contact path.” Exhibit 10 at 1. Since the Bela MD System is a “closed loop system,” the serum emitted from the Bela MD System’s handpiece assembly can be fluid from a first container and at least a second container.</p>
<p>(a)(i) wherein each of the first container and the at least second container is configured to contain a treatment material;</p>	<p>The first fluid container and the at least second fluid container of the Bela MD System are configured to contain a treatment material.</p> <p>Luvo explains “customizable treatment options and targeted serum solutions” as part of its “comprehensive system [that] helps treat and protect against common skin concerns.” Exhibit 8 at 2. Clarion advertises its Bela MD System as combining “the latest serum innovations and aesthetic technologies to address a variety of skin conditions and improve overall skin quality.” Exhibit 9 at 1. Clarion also describes the use of its serums with the “Aqua handpiece,” stating that “BELA MD bio-infusion serum or hydrogen water is emitted from the central aperture of the Aqua tip and infused into the skin along the</p>

	<p>contact path. Remaining solution dissolves any impurities, then exits through the waste inlet port.” <i>Id.</i> at 2.</p>
<p>(a)(ii) the manifold system being positioned in or on a console;</p>	<p>The manifold system of the Bela MD System is positioned in or on a console.</p> <p>The image below shows that the Bela MD System has a manifold system positioned in the console.</p> <div data-bbox="532 558 1240 1243" data-label="Image"> </div> <p>Exhibit 10 at 1; <i>see also Exhibit 8</i> at 1 (image of console with manifold system positioned in or on console); Exhibit 9 at 1 (same).</p>
<p>(b) a supply conduit placing the manifold system in fluid communication with a handpiece assembly;</p>	<p>The Bela MD System comprises a supply conduit placing the manifold system in fluid communication with a handpiece assembly.</p> <p>The Luvo, Clarion, and MRP websites show the Bela MD System with a handpiece assembly:</p>

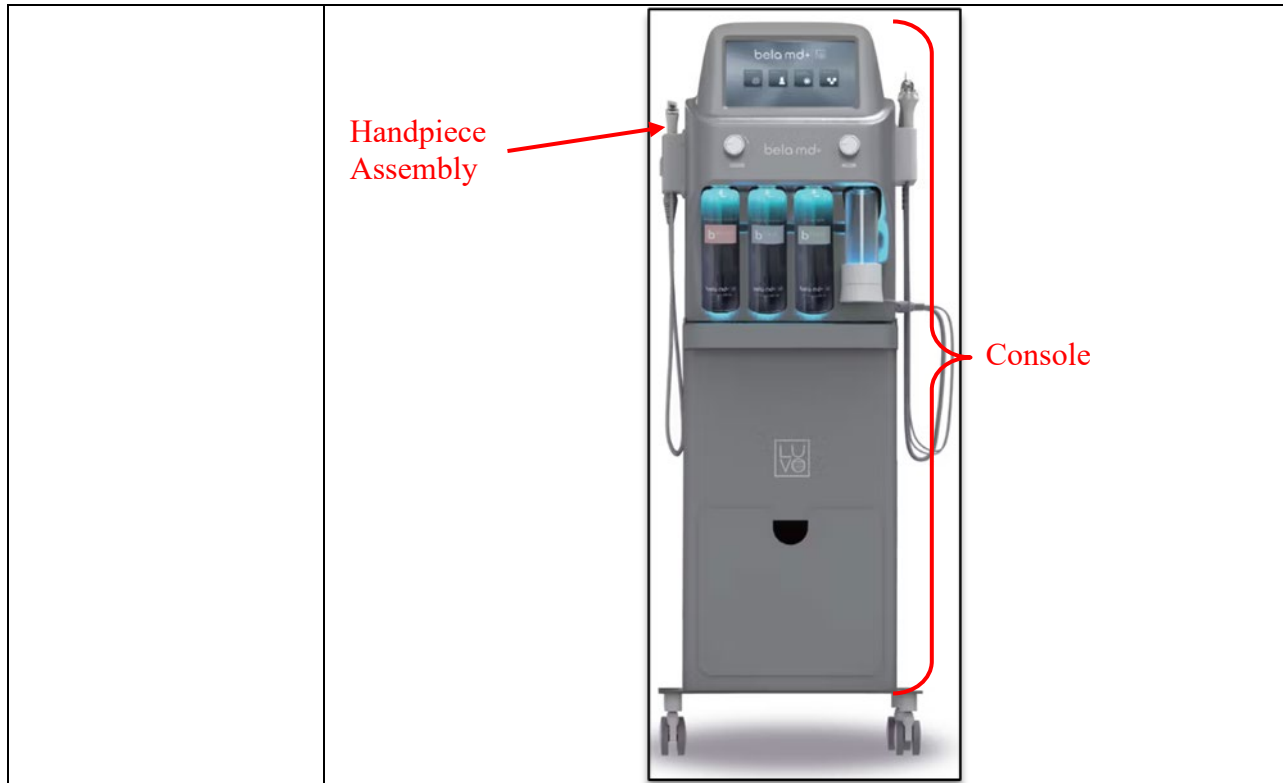



Exhibit 10 at 1. The Clarion website explains that the Bela MD System has a “Aqua handpiece and Aqua tip.” **Exhibit 9** at 2. The Bela MD System’s aqua handpiece and aqua tip form “a closed loop system,” where “BELA MD bio-infusion serum or hydrogen water is emitted from the central aperture of the Aqua tip and infused into the skin along the contact path.”

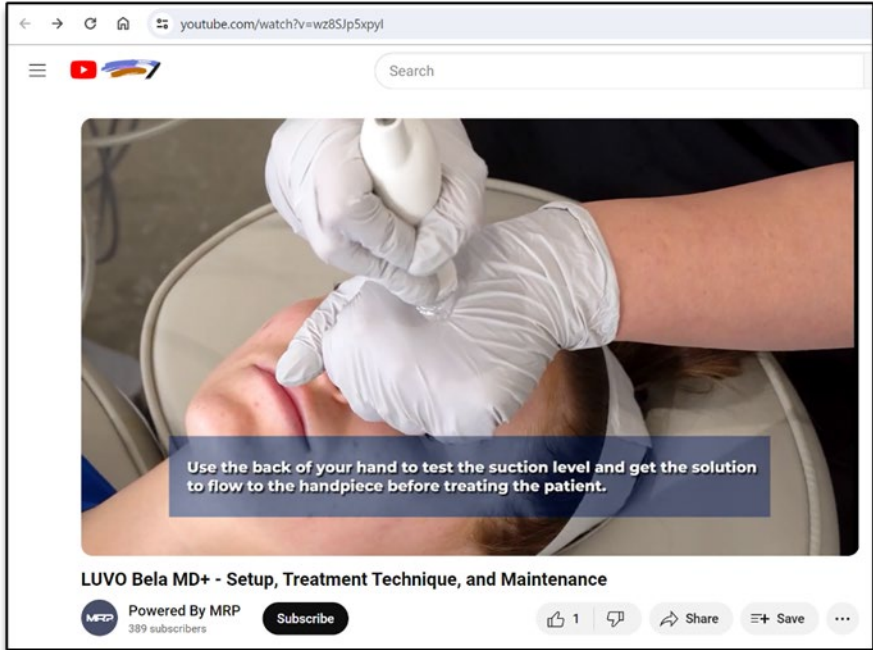
Infusion with Aqua handpiece and Aqua tip

The Aqua handpiece is a closed looped system. BELA MD bio-infusion serum or hydrogen water is emitted from the central aperture of the Aqua tip and infused into the skin along the contact path. Remaining solution dissolves any impurities, then exits through the waste inlet port. The BELA MD+ touchscreen interface allows for easy and precise adjustments of vacuum & flow levels.



Id. Thus, the handpiece assembly of the Bela MD System is in fluid communication with the manifold via a supply conduit.

The MRP setup, operation, and maintenance video shows that the manifold system of the console is in fluid communication with the handpiece assembly via a supply conduit. For example, the user can select to turn on a vacuum and place the working end of the handpiece assembly against the skin, causing the Bela MD System to draw fluid from the manifold system through the supply conduit to the handpiece assembly.

	 <p>Exhibit 12 at 3.</p>
<p>(c) wherein the handpiece assembly comprises a working end having a skin contact surface;</p>	<p>The Bela MD System has a handpiece assembly comprising a working end having a skin contact surface.</p> <p>The Luvo, Clarion, and MRP websites show the Bela MD System with a handpiece assembly having a working end:</p>

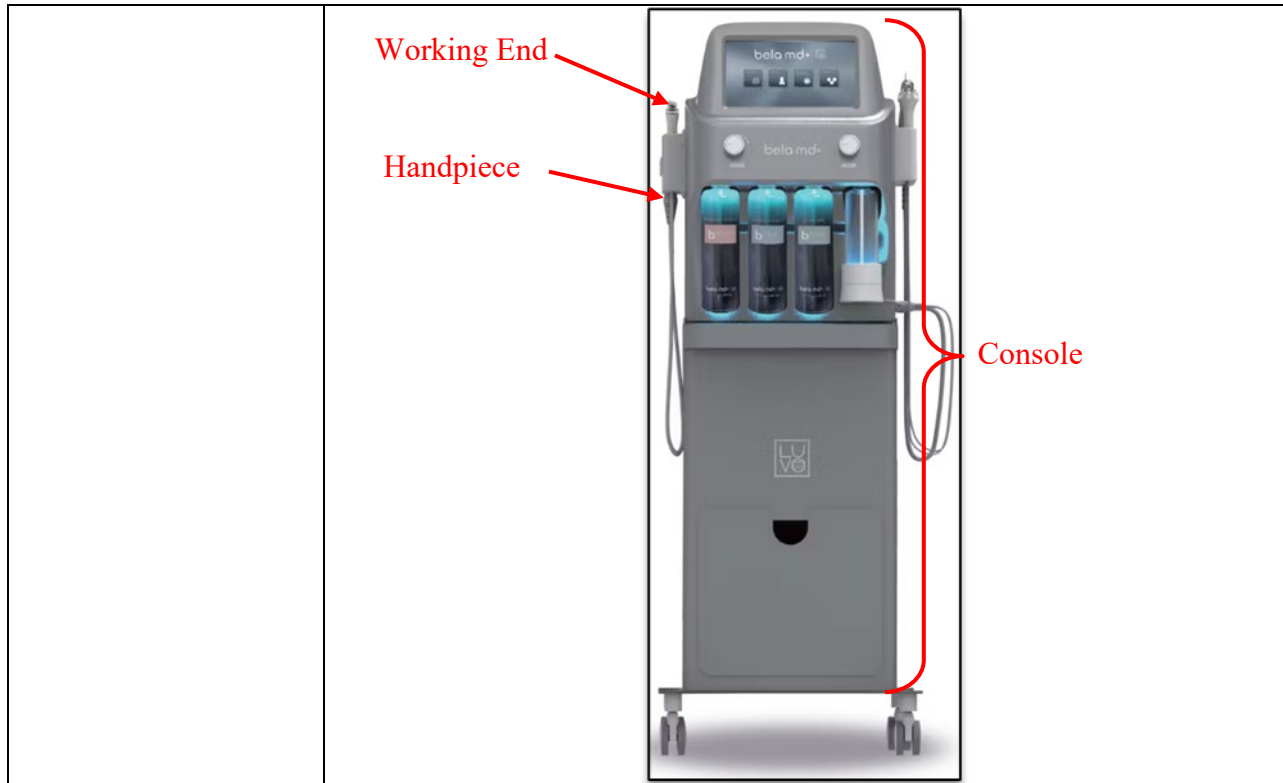


Exhibit 10 at 1.

In its setup, operation, and maintenance video, MRP demonstrates that the Bela MD System's handpiece assembly is configured for the working end to contact skin tissue of a subject.

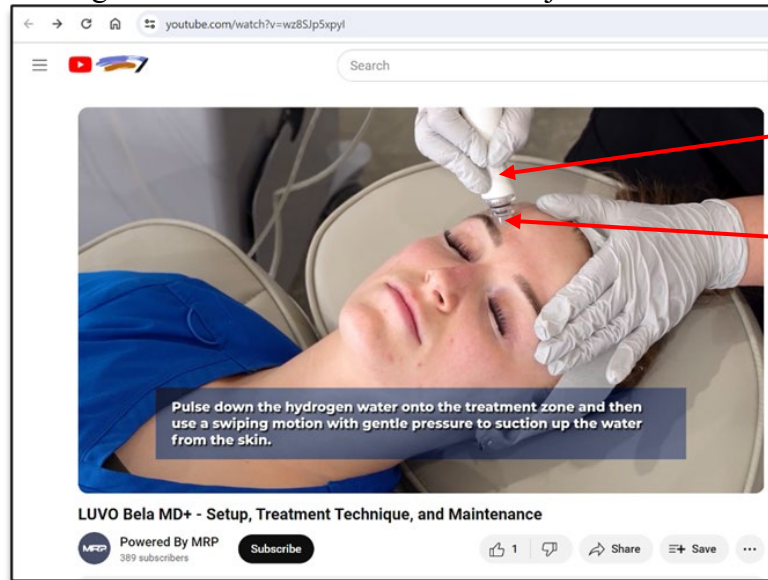


Exhibit 12 at 2.

<p>(d) a vacuum source;</p>	<p>The Bela MD System comprises a vacuum source.</p> <p>The Clarion website indicates that the Bela MD System has a vacuum source, as the Bela MD System “allows for easy and precise adjustments of vacuum and flow levels.” Exhibit 9 at 2.</p> <p>Similarly, the Luvo website states that the Bela MD System’s “Aqua Cleansing handpiece” simultaneously cleanses and removes waste and debris “through strong radial rotation paired with vacuum suction.” Exhibit 8 at 2.</p>
<p>(e) a waste conduit in fluid communication with the handpiece assembly and the vacuum source to move waste away from the working end of the handpiece assembly during a skin treatment procedure; and</p>	<p>The Bela MD System comprises a waste conduit in fluid communication with the handpiece assembly and the vacuum source to move waste away from the working end of the handpiece assembly during a skin treatment procedure.</p> <p>The Clarion website indicates that the handpiece draws spent treatment fluid and waste away from the skin through the waste conduit via a “waste inlet port.”</p> <div data-bbox="516 982 1422 1167" data-label="Image"> </div> <p>Exhibit 9 at 2.</p> <p>Luvo’s brochure advertises the Bela MD System’s aqua handpiece as having serum infused “through the aqua tip while it simultaneously removes waste with radial rotation and vacuum suction.”</p> <div data-bbox="626 1360 1308 1675" data-label="Image"> </div> <p>Exhibit 11 at 4. This removal of waste occurs via a waste conduit in fluid communication with the handpiece assembly and vacuum source.</p>
<p>(f) at least one control to permit control of a</p>	<p>The Bela MD System has at least one control to permit control of a flow of treatment material from the first container and the at least second</p>

flow of treatment material from the first container and the at least second container through the supply conduit to the handpiece assembly;

container through the supply conduit to the handpiece assembly.

As explained above, the manifold system is in fluid communication with a first container and at least a second container. *See* limitation 1[a], *supra*. As also explained above, the supply conduit places the manifold system in fluid communication with the handpiece assembly. *See* limitation 1[b], *supra*. The first and the at least second container contain treatment material. *See* limitation 1[a][i], *supra*. As shown below, the Bela MD System has at least one control to permit the flow from the first and the at least second container through the supply conduit to the handpiece assembly.


The Clarion website states that the Bela MD System’s touchscreen interface “allows for easy and precise adjustments of vacuum *and* flow levels.” (emphasis added).



Exhibit 9 at 2.

The MRP setup, operation, and maintenance video shows that the user can adjust the intensity of the vacuum and place the tip of the handpiece assembly against the skin, causing the Bela MD System to draw fluid from the manifold to the handpiece assembly via the supply conduit. The video also shows that the user can twist a “Flow” knob that controls the amount of fluid from the fluid containers to the handpiece.



	<p>Exhibit 12 at 4.</p>
<p>(g) wherein the vacuum source is configured to create a suction force within the waste conduit and along the working end of the handpiece assembly to help remove waste from the hand piece assembly via the waste conduit and to help transfer at least one treatment material from the manifold system to the handpiece assembly.</p>	<p>The Bela MD System comprises a vacuum source configured to create a suction force within the waste conduit and along the working end of the handpiece assembly to help remove waste from the hand piece assembly via the waste conduit and to help transfer at least one treatment material from the manifold system to the handpiece assembly.</p> <p>As explained above, the Bela MD System comprises (a) a vacuum source, (b) a handpiece assembly comprising a working end configured to contact the skin surface of a subject, and (c) a waste conduit in fluid communication with the handpiece assembly and the vacuum source to move waste away from the working end of the handpiece assembly during a skin treatment procedure. <i>See</i> limitations 1[b], 1[d], and 1[e], <i>supra</i>. As shown below, the vacuum source creates a suction force within the waste conduit and along the working end of the handpiece assembly to both help remove waste from the hand piece assembly via the waste conduit and help transfer at least one treatment material from the manifold system to the handpiece assembly.</p> <p>Luvo advertises that the Bela MD System “delivers targeted Bio-infusion serum through the center of the tip, <i>simultaneously</i> cleansing and removing waste and debris.” Exhibit 8 at 2 (emphasis added). To accomplish this, the Bela MD System uses “strong radial rotation paired with vacuum suction.”</p> <div data-bbox="529 1251 992 1619" style="border: 1px solid black; padding: 10px; margin: 10px 0;">  <p>Aqua cleansing & exfoliation</p> <p>BELA'S Aqua Cleansing handpiece delivers targeted Bio-infusion serum through the center of the tip, simultaneously cleansing and removing waste and debris through strong radial rotation paired with vacuum suction. The level of exfoliation can be customized to suit treatment needs.</p> </div> <p><i>Id.</i></p>

Suction Force Along Working End

Luvo's brochure advertises the Bela MD System's aqua handpiece as having serum infused "through the aqua tip while it simultaneously removes waste with radial rotation and vacuum suction."

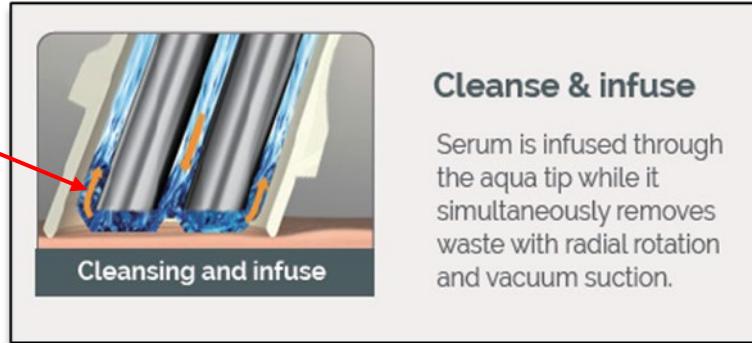


Exhibit 11 at 4.

The MRP setup, operation, and maintenance video shows what happens when the vacuum source is activated and the working end of the handpiece assembly contacts the skin surface. As shown in the image below, the user can turn on the vacuum source and place the working end of the handpiece assembly against the skin, causing the Bela MD System to draw fluid from the first container or the second container to the working end via the supply conduit.

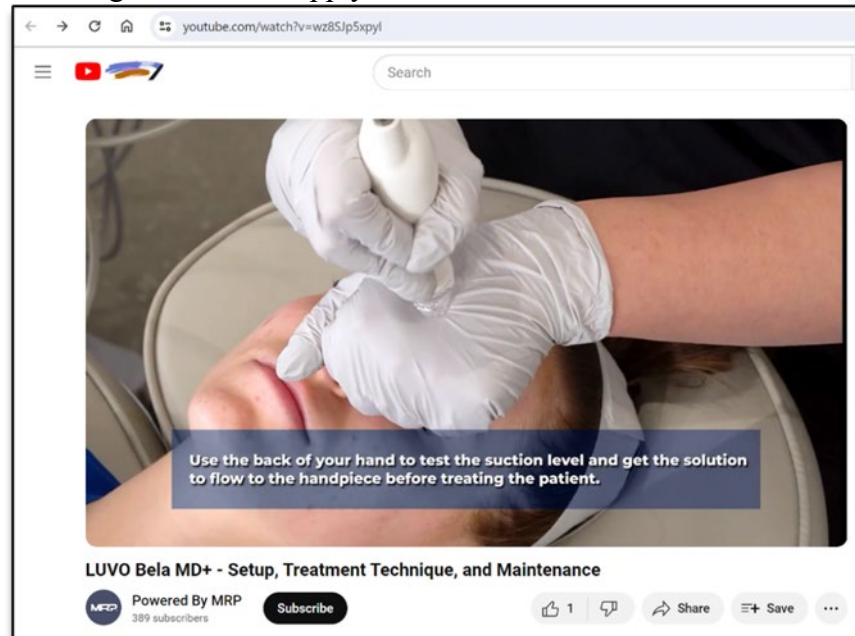


Exhibit 12 at 3.

85. Each of the Defendants Luvo, Clarion, MRP, and Eunsung are liable under 35

U.S.C. § 271(b) for actively inducing others to infringe the '477 Patent because, among other things, each of the Defendants Luvo, Clarion, MRP, and Eunsung has marketed, sold, and offered for sale, and continues to market, sell, and offer for sale, the accused hydrodermabrasion products and components thereof knowing and intending that such hydrodermabrasion products would be assembled or used by customers and end users in a manner that infringes at least Claim 1 of the '477 Patent. *See Exhibits 8–11*. To that end, upon information and belief, Defendants Luvo and Clarion provided and provide instructions and information to its customers and end users of the accused hydrodermabrasion products and components thereof, encouraging assembly and use of the accused hydrodermabrasion products and components thereof in a manner that infringes the '477 Patent. *See Exhibit 20* (“We work with passionate physicians who share in our goal, and provide the support, training and resources they need to grow their practices and provide the best in patient care.”); *Exhibit 21* (“We provide an integrated approach to clinical education, from demonstration to in-service training, not only on the technical aspects of your system but on procedure and best practices.”). Similarly, Defendant MRP provided and provides instructions and information to its customers and end users of the accused hydrodermabrasion products and components thereof, encouraging assembly and use of the accused hydrodermabrasion products and components thereof in a manner that infringes the '477 Patent. *See Exhibits 12 and 13*. Upon information and belief, Defendant Eunsung provided and provides instructions and information to its customers and end users of the accused hydrodermabrasion products and components thereof, encouraging assembly and use of the accused hydrodermabrasion products and components thereof in a manner that infringes the '477 Patent.

86. Further, customers and users have assembled and/or used the accused hydrodermabrasion products and components thereof in a manner that infringes the '477 Patent (and continue to do so). *See Exhibits 12 and 13* (providing training and explanation videos for use of the Bela MD System).

87. Each of the Defendants Luvo, Clarion, MRP, and Eunsung is liable for contributory infringement under 35 U.S.C. § 271(c) because, among other things, each of the Defendants Luvo, Clarion, MRP, and Eunsung has sold or offered for sale, and continues to sell and/or offers for sale within the United States and/or has imported and continues to import into the United States, the accused hydrodermabrasion products and components thereof constituting material parts of the invention of at least Claim 1 of the '477 Patent, that are not staple articles or commodities of commerce suitable for substantial non-infringing use. *See supra; Exhibits 8–14*. Each of the Defendants has and continues to so act, knowing that the accused hydrodermabrasion products and components thereof are especially made for or adapted for use in an infringement of the '477 Patent. *See Exhibits 12 and 13*. Further, customers and users have assembled and/or used the accused hydrodermabrasion products and components thereof in a manner that infringes the '477 Patent (and continue to do so). *See Exhibits 12 and 13* (providing training and explanation videos for use of the Bela MD System).

88. As a direct and proximate result of each of the Defendant's acts of infringement, each of the Defendants has derived and received gains, profits, and advantages. Plaintiff has been damaged by each of the Defendant's activities, in an amount to be determined at trial, but in no event less than a reasonable royalty.

89. Each of the Defendant's infringement has been and continues to be willful.

Pursuant to 35 U.S.C. § 284, Plaintiff is entitled to damages for each of the Defendant's infringing acts and treble damages together with interests and costs as fixed by this Court.

90. This is an exceptional case. Pursuant to 35 U.S.C. § 285, Plaintiff is entitled to reasonable attorneys' fees for the necessity of bringing this action.

91. Due to the aforesaid infringing acts, Plaintiff has suffered irreparable injury, for which Plaintiff has no adequate remedy at law.

92. Unless enjoined by this Court, each of the Defendants will continue to infringe Plaintiff's patent rights and cause Plaintiff further irreparable injury.

VIII. COUNT V

INFRINGEMENT OF THE '287 PATENT

93. Plaintiff incorporates by reference and realleges each of the allegations set forth in Paragraphs 1-92 above.

94. Each of the Defendants knowingly and intentionally infringed the '287 Patent in violation of 35 U.S.C. § 271(a) through, for example, the use, sale, offer for sale, and/or importation into the United States of the Bela MD System during the term of the '287 Patent. Defendant Eunsung has made, used, offered for sale, sold, and imported into the United States the infringing Bela MD System. Defendants Luvo and Clarion have used, offered for sale, sold, and imported into the United States the infringing Bela MD System. Defendant MRP has used, offered for sale, sold, and imported into the United States the infringing Bela MD System.

95. For example, as set forth in the claim chart below, the Bela MD System infringes at least Claim 1 of the '287 Patent.

Claim Language	Bela MD System
<p>1. A system for treating skin, the system comprising:</p>	<p>To the extent that the preamble is deemed to be a limitation, the Bela MD System is a system for treating skin.</p> <p>The Luvo website refers to the Bela MD System as a “medical skin health platform” that is “designed to provide improvement in primary skin concerns while addressing the overall health and appearance of the skin.” Exhibit 8 (Luvo Website) at 1. The Clarion website calls the Bela MD System an “[a]dvanced [s]kin [h]ealth [p]latform” that provides a “relaxing, non invasive treatment.” Exhibit 9 (Clarion Website) at 1. The MRP website similarly promotes the Bela MD System as an “[a]dvanced [s]kin [h]ealth [p]latform.” Exhibit 10 (MRP Website) at 1.</p>
<p>(a) a console configured to receive a first container and at least one additional container,</p>	<p>The Bela MD System comprises a console configured to receive a first container and at least one additional container.</p> <div data-bbox="490 892 1258 1669" style="text-align: center;"> <p>The image shows a grey medical console on wheels. At the top, there is a control panel with a screen and buttons. Below the panel are three blue cylindrical containers. Red arrows point from labels to these containers: 'First Container' points to the leftmost one, and 'Additional Containers' points to the two on the right. A red bracket on the right side of the console is labeled 'Console'. The Luvo logo is visible on the front of the console's main body.</p> </div> <p>Exhibit 10 at 1; <i>see also</i> Exhibit 8 at 1 (also showing console receiving multiple containers); Exhibit 9 at 1 (same).</p>

(b) a handpiece configured to contact skin tissue of a subject;

The Bela MD System comprises a handpiece configured to contact skin tissue of a subject.

The Luvo, Clarion, and MRP websites show the Bela MD System with a handpiece:

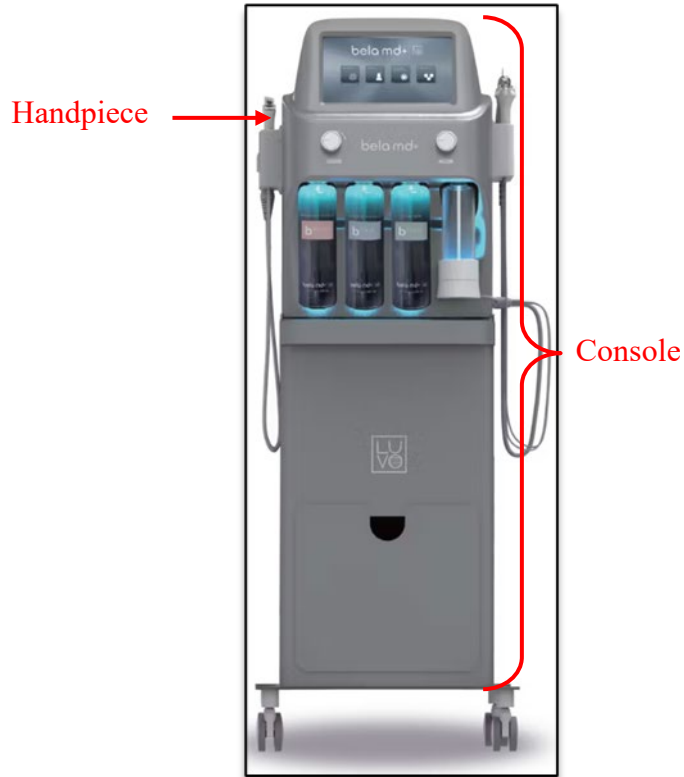


Exhibit 10 at 1.

The Clarion website explains that the “Aqua handpiece and Aqua tip” form “a closed loop system,” where “BELA MD System bio-infusion serum or hydrogen water is emitted from the central aperture of the Aqua tip and infused into the skin along the contact path.”

Infusion with Aqua handpiece and Aqua tip

The Aqua handpiece is a closed looped system. BELA MD bio-infusion serum or hydrogen water is emitted from the central aperture of the Aqua tip and infused into the skin along the contact path. Remaining solution dissolves any impurities, then exits through the waste inlet port. The BELA MD+ touchscreen interface allows for easy and precise adjustments of vacuum & flow levels.



Exhibit 9 at 2.

(c) a block in console,

The Bela MD System comprises a block in the console.

The Luvo, Clarion, and MRP websites show the Bela MD System with a handpiece assembly having a working end:

The Bela MD System includes a block in the console:

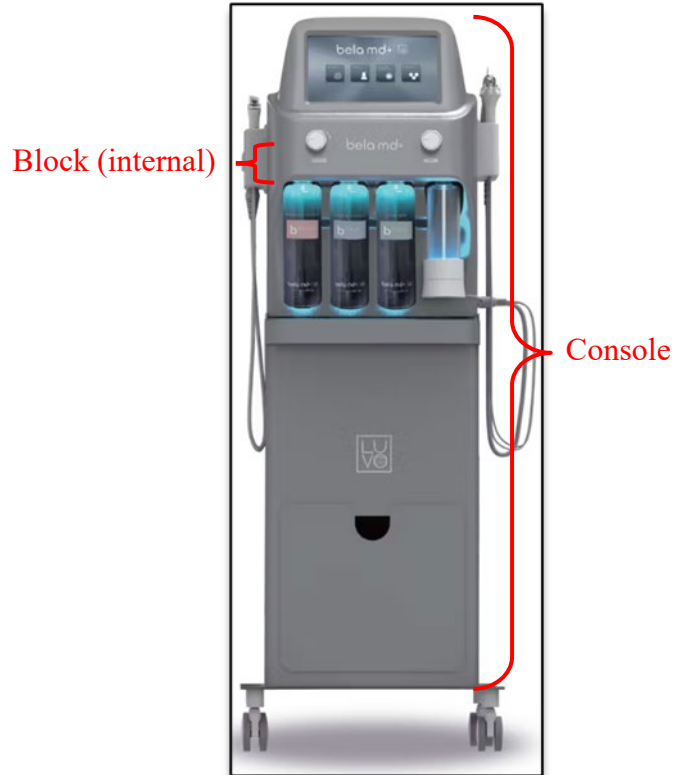


Exhibit 10 at 1.

(c)(i) wherein the block is: configured to selectively receive fluid from the first container when the first container is connected to the console;

The block of the Bela MD System is configured to selectively receive fluid from the first container when the first container is connected to the console.

As shown in the image below, the first container couples to the block of the Bela MD System:

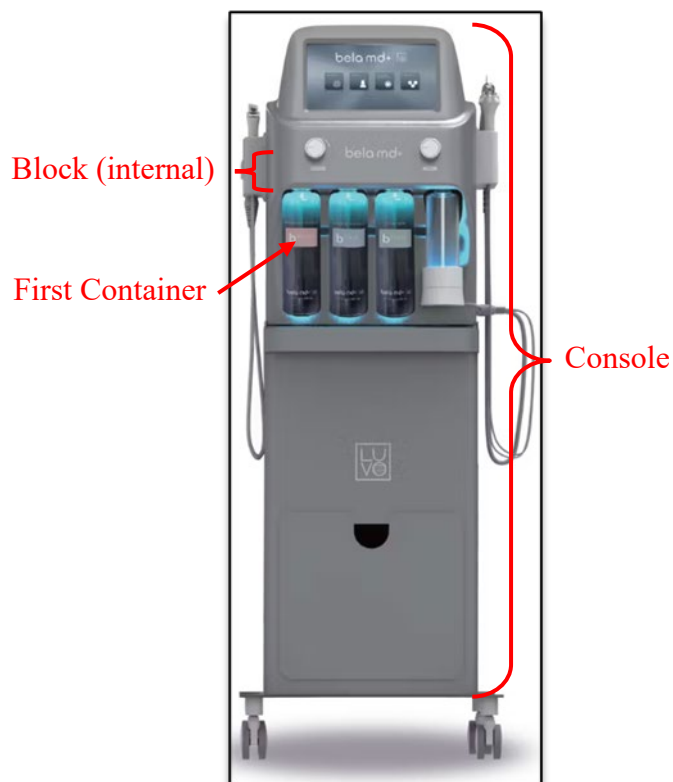

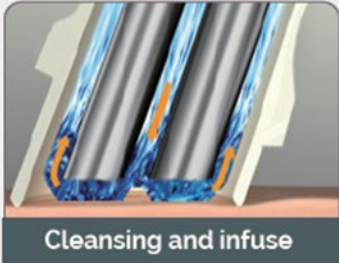


Exhibit 10 at 1. The Clarion website describes the Aqua handpiece function of the Bela MD System as “a closed looped system” where “BELA MD bio-infusion serum or hydrogen water is emitted from the central aperture of the Aqua tip and infused into the skin along the contact path.” **Exhibit 9** at 2. Because the Bela MD System is a “closed loop system,” the serum emitted from the Bela MD System handpiece can be fluid from the first container when the first container is connected to the console.

<p>(c)(ii) configured to selectively receive fluid from the at least one additional container when the at least one additional container is connected to the console; and;</p>	<p>The block of the Bela MD System is configured to selectively receive fluid from the at least one additional container when the at least one additional container is connected to the console.</p> <p><i>See limitation 1(c)(i) above.</i></p>
<p>(c)(iii) configured to selectively be in fluid communication with the handpiece through a first conduit when the handpiece is connected to the console;</p>	<p>The block of the Bela MD System is configured to selectively be in fluid communication with the handpiece through a first conduit when the handpiece is connected to the console.</p> <p>The Clarion website indicates that the solution flows through first conduit (“emitted from the central aperture of the Aqua tip”) when the handpiece is applied to the patient’s skin:</p> <div data-bbox="500 892 1425 1077" style="border: 1px solid black; padding: 5px;"> <p>Infusion with Aqua handpiece and Aqua tip</p> <p>The Aqua handpiece is a closed looped system. BELA MD bio-infusion serum or hydrogen water is emitted from the central aperture of the Aqua tip and infused into the skin along the contact path. Remaining solution dissolves any impurities, then exits through the waste inlet port. The BELA MD+ touchscreen interface allows for easy and precise adjustments of vacuum & flow levels.</p>  </div> <p>Exhibit 9 at 2. Similarly, the Luvo website states that the Bela MD System’s “Aqua Cleansing handpiece delivers targeted Bio-infusion serum through the center of the tip.” Exhibit 8 at 2.</p> <p>Luvo’s brochure advertises the Bela MD System’s aqua handpiece as having serum infused “through the aqua tip while it simultaneously removes waste with radial rotation and vacuum suction.”</p> <div data-bbox="591 1360 1344 1705" style="border: 1px solid black; padding: 5px;">  <p>Cleanse & infuse</p> <p>Serum is infused through the aqua tip while it simultaneously removes waste with radial rotation and vacuum suction.</p> </div> <p>Exhibit 11 at 4.</p>
<p>(d) a vacuum source, wherein the console comprises the vacuum</p>	<p>The Bela MD System comprises a vacuum source and the console comprises the vacuum source.</p>

source; and

The Clarion website indicates that the Bela MD System has a vacuum source, as the Bela MD System “allows for easy and precise adjustments of vacuum and flow levels.” **Exhibit 9** at 2.

Similarly, the Luvo website states that the Bela MD System’s “Aqua Cleansing handpiece” simultaneously cleanses and removes waste and debris “through strong radial rotation paired with vacuum suction.” **Exhibit 8** at 2.

The MRP setup, operation, and maintenance video instructs the user to change the settings for the vacuum depending on the treatment.

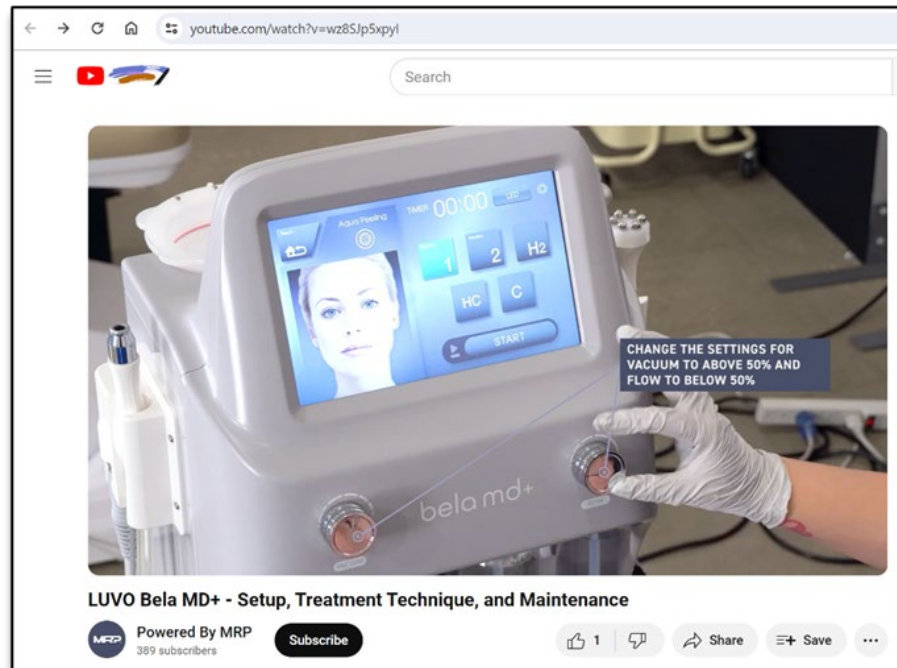


Exhibit 12 at 4. Because the Bela MD System does not require any connections to a vacuum source outside of the console, the console comprises the vacuum source. This is further confirmed by the MRP video showing the installation of a power cable on the back of the Bela MD System, which powers the vacuum source in the console.

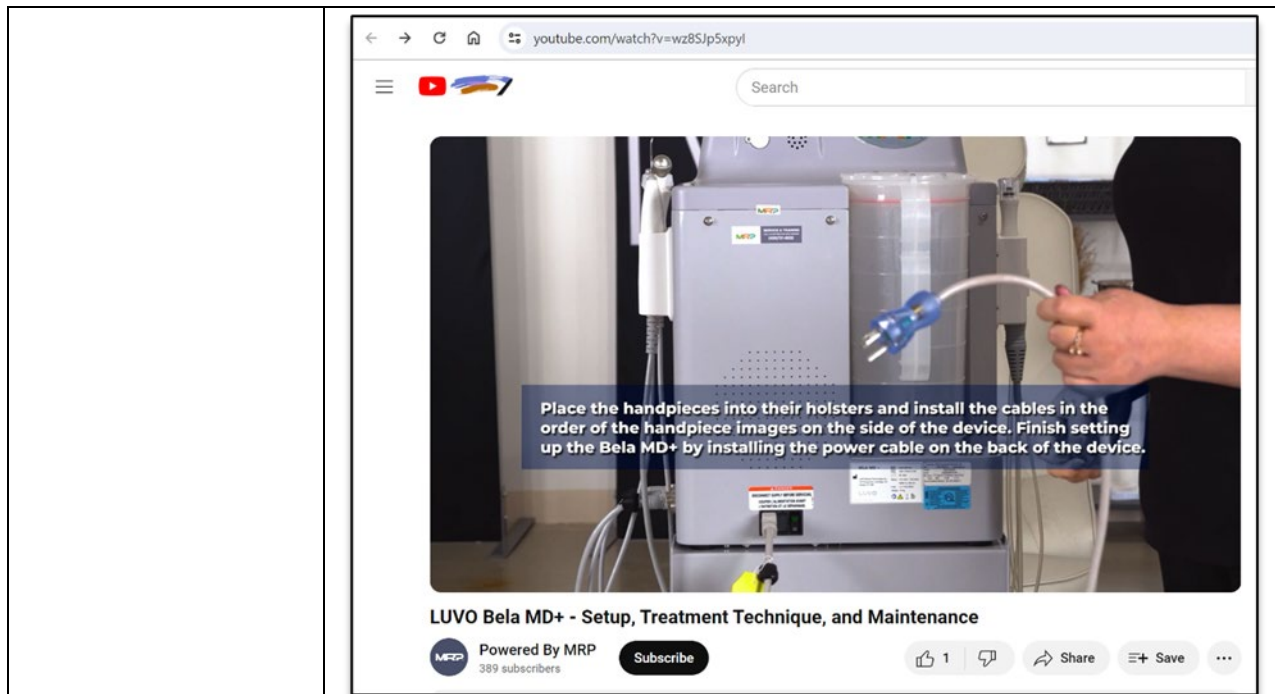


Exhibit 12 at 3.

(e) wherein the handpiece is configured to be in fluid communication with the vacuum source through a second conduit when the handpiece is connected to the console;

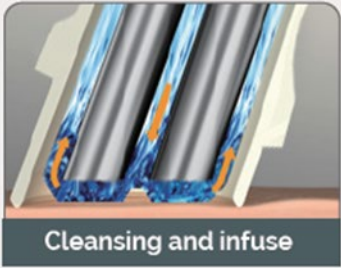
The handpiece of the Bela MD System is configured to be in fluid communication with the vacuum source through a second conduit when the handpiece is connected to the console.

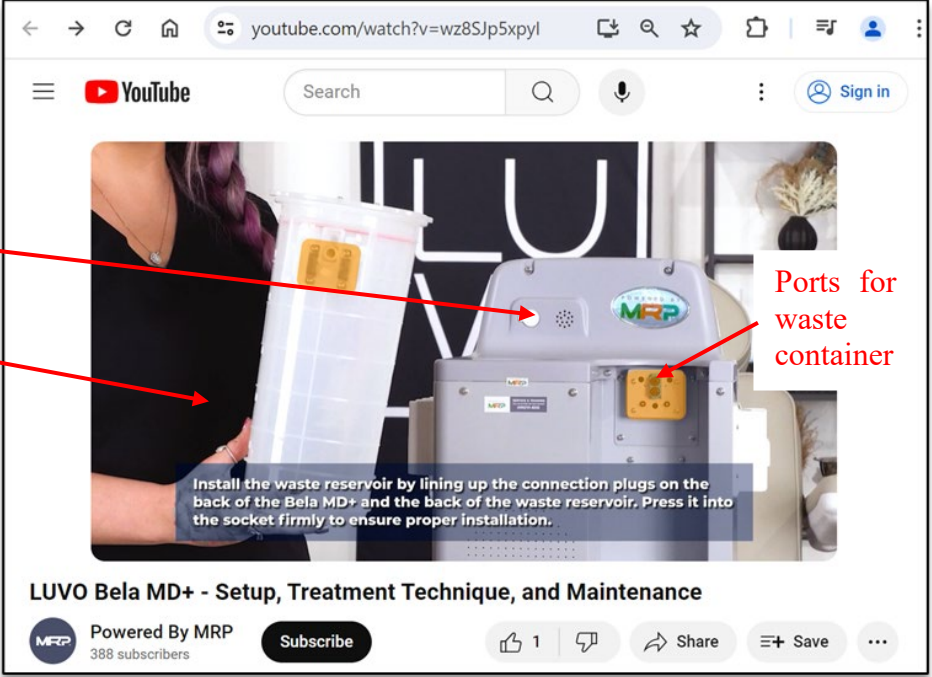
The Clarion website indicates that the solution flows through first conduit (“emitted from the central aperture of the Aqua tip”) when the handpiece is applied to the patient’s skin:

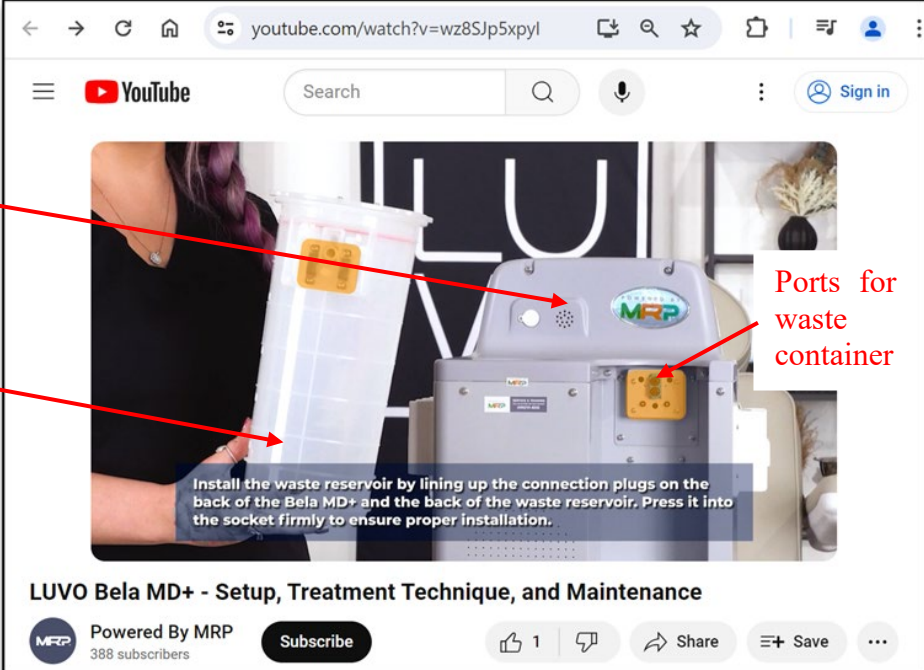


Exhibit 9 at 2 (referring to a “waste inlet port” for the Bela MD System’s Aqua handpiece).

Luvo’s brochure advertises the Bela MD System’s aqua handpiece as having serum infused “through the aqua tip while it simultaneously removes waste with radial rotation and vacuum suction.”

	<div data-bbox="592 304 1344 646" style="border: 1px solid black; padding: 10px;">  <p style="text-align: center;">Cleansing and infuse</p> <p>Cleanse & infuse</p> <p>Serum is infused through the aqua tip while it simultaneously removes waste with radial rotation and vacuum suction.</p> </div> <p>Exhibit 11 at 4. As shown in the image above, the vacuum suction removes waste away from the tip of the handpiece, thus showing the vacuum source in fluid communication with the handpiece.</p>
<p>(f)(i) wherein when the handpiece, the first container, the at least one additional container and a waste container are each connected to the console, the first container contains a first treatment fluid, and the at least one additional container contains an additional treatment fluid,</p>	<p>When the handpiece, the first container, the at least one additional container and a waste container are each connected to the console, the first container contains a first treatment fluid, and the at least one additional container contains an additional treatment fluid, the handpiece of the Bela MD System is in fluid communication with the vacuum source and the waste container through the second conduit.</p> <p>As explained above, the user is instructed to connect the handpiece to the console. <i>See</i> limitations 1[b] and 1[c][iii], <i>supra</i>.</p> <p>As explained above, the user is instructed to connect the first container to the console and it contains a first treatment fluid, and the user is instructed to connect the at least one additional container to the console and it contains an additional treatment fluid. <i>See</i> limitations 1[a], 1[c][i], and 1[c][ii], <i>supra</i>.</p> <p>As shown below, the Bela MD System also includes a waste container connected to the console.</p> <p>The MRP setup, operation, and maintenance video instructs the user to connect the waste container to the console.</p>

<p>Ports for the console</p> <p>Waste container</p>	 <p>Exhibit 12 at 4.</p>
<p>(f)(ii) the handpiece is in fluid communication with the vacuum source and the waste container through the second conduit; and</p>	<p>When the conditions in limitation 1(f)(i) are satisfied, the handpiece of the Bela MD System is in fluid communication with the vacuum source and the waste container through the second conduit.</p> <p>As explained above, the handpiece is in fluid communication with the vacuum source through the second conduit. <i>See</i> limitation 1(e), <i>supra</i>.</p> <p>As explained below, the handpiece is also in fluid communication with the waste container through the second conduit.</p> <p>The MRP setup, operation, and maintenance video instructs the user to connect the waste container to the console.</p>

<p>Ports for the console</p> <p>Waste container</p>	 <p>Exhibit 12 at 4. As seen in the image above, both the waste container and the console include two ports. One port allows for the depositing of waste from the handpiece into the waste container via the second conduit. The other port allows for the effectuation of the vacuum source on the “closed loop system” to draw waste from the handpiece to the waste container via the second conduit. <i>See Exhibit 9</i> at 2. Thus, the handpiece of the Bela MD System is in fluid communication with the vacuum source and the waste container through the second conduit.</p>
<p>(g) the system is configured to deliver the first treatment fluid contained in the first container and the additional treatment fluid contained in the at least one additional container to the handpiece sequentially.</p>	<p>The Bela MD System is configured to deliver the first treatment fluid contained in the first container and the additional treatment fluid contained in the at least one additional container to the handpiece sequentially.</p> <p>As explained above, the user selects the container from the system menu for treating the patient. <i>See</i> limitation 1(b), 1(c)(i), and 1(c)(ii), <i>supra</i>. As explained below, the delivery of the first treatment fluid contained in the first container and the additional treatment fluid contained in the at least one additional container to the handpiece occurs sequentially.</p> <p>The MRP setup, operation, and maintenance video shows the user delivering a first treatment fluid contained in the first container and the additional treatment fluid contained in the at least one additional container by selecting buttons associated with these containers.</p>

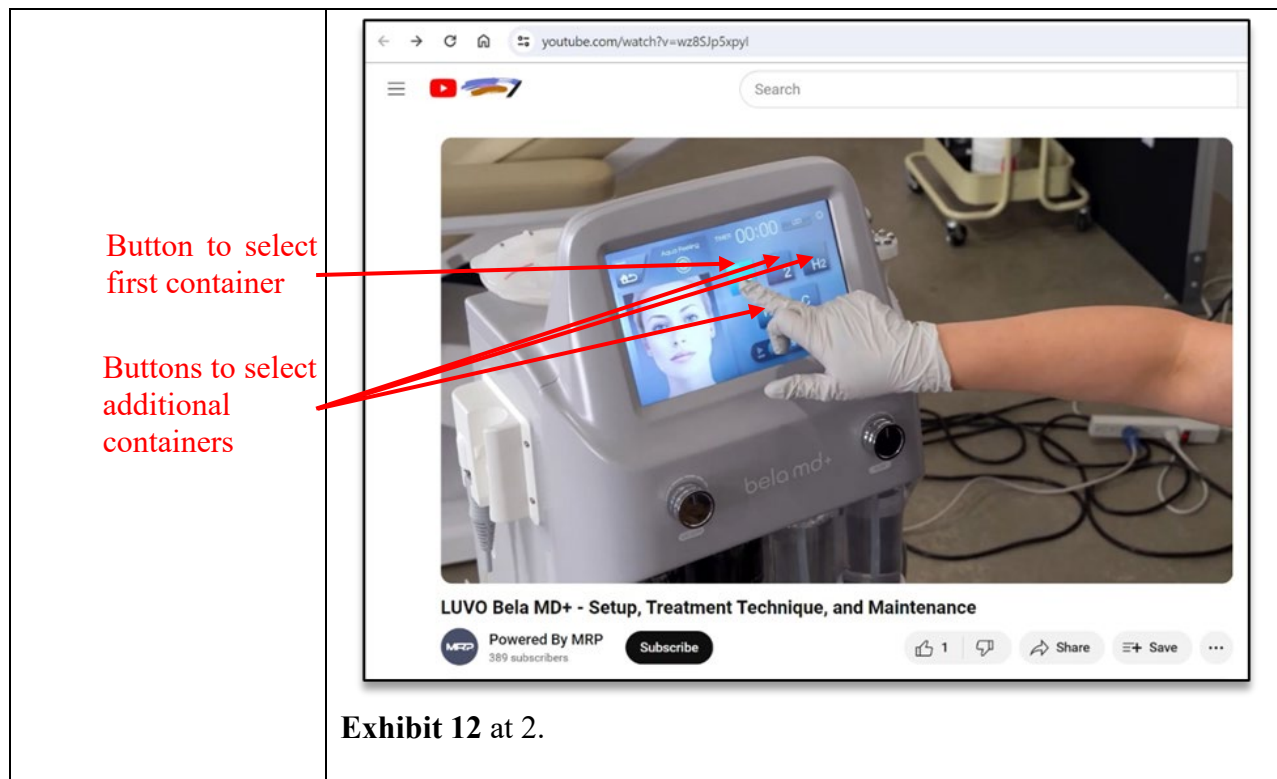


Exhibit 12 at 2.

96. Each of the Defendants Luvo, Clarion, MRP, and Eunsung are liable under 35 U.S.C. § 271(b) for actively inducing others to infringe the '287 Patent because, among other things, each of the Defendants Luvo, Clarion, MRP, and Eunsung has marketed, sold, and offered for sale, and continues to market, sell, and offer for sale, the accused hydrodermabrasion products and components thereof knowing and intending that such hydrodermabrasion products would be assembled or used by customers and end users in a manner that infringes at least Claim 1 of the '287 Patent. *See Exhibits 8–11.* To that end, upon information and belief, Defendants Luvo and Clarion provided and provides instructions and information to its customers and end users of the accused hydrodermabrasion products and components thereof, encouraging assembly and use of the accused hydrodermabrasion products and components thereof in a manner that infringes the '287 Patent. *See Exhibit 20* (“We work with passionate physicians

who share in our goal, and provide the support, training and resources they need to grow their practices and provide the best in patient care.”); **Exhibit 21** (“We provide an integrated approach to clinical education, from demonstration to in-service training, not only on the technical aspects of your system but on procedure and best practices.”). Similarly, Defendant MRP provided and provides instructions and information to its customers and end users of the accused hydrodermabrasion products and components thereof, encouraging assembly and use of the accused hydrodermabrasion products and components thereof in a manner that infringes the ’287 Patent. *See Exhibits 12 and 13.* Upon information and belief, Defendant Eunsung provided and provides instructions and information to its customers and end users of the accused hydrodermabrasion products and components thereof, encouraging assembly and use of the accused hydrodermabrasion products and components thereof in a manner that infringes the ’287 Patent.

97. Further, customers and users have assembled and/or used the accused hydrodermabrasion products and components thereof in a manner that infringes the ’287 Patent (and continue to do so). *See Exhibits 12 and 13* (providing training and explanation videos for use of the Bela MD System).

98. Each of the Defendants Luvo, Clarion, MRP, and Eunsung is liable for contributory infringement under 35 U.S.C. § 271(c) because, among other things, each of the Defendants Luvo, Clarion, MRP, and Eunsung has sold or offered for sale, and continues to sell and/or offers for sale within the United States and/or has imported and continues to import into the United States, the accused hydrodermabrasion products and components thereof constituting material parts of the invention of at least Claim 1 of the ’287 Patent, that are not staple articles or

commodities of commerce suitable for substantial non-infringing use. *See supra*; **Exhibits 8–14**. Each of the Defendants has and continues to so act, knowing that the accused hydrodermabrasion products and components thereof are especially made for or adapted for use in an infringement of the '287 Patent. *See Exhibits 12 and 13*. Further, customers and users have assembled and/or used the accused hydrodermabrasion products and components thereof in a manner that infringes the '287 Patent (and continue to do so). *See Exhibits 12 and 13* (providing training and explanation videos for use of the Bela MD System).

99. As a direct and proximate result of each of the Defendant's acts of infringement, each of the Defendants has derived and received gains, profits, and advantages. Plaintiff has been damaged by each of the Defendant's activities, in an amount to be determined at trial, but in no event less than a reasonable royalty.

100. Each of the Defendant's infringement has been and continues to be willful. Pursuant to 35 U.S.C. § 284, Plaintiff is entitled to damages for each of the Defendant's infringing acts and treble damages together with interests and costs as fixed by this Court.

101. This is an exceptional case. Pursuant to 35 U.S.C. § 285, Plaintiff is entitled to reasonable attorneys' fees for the necessity of bringing this action.

102. Due to the aforesaid infringing acts, Plaintiff has suffered irreparable injury, for which Plaintiff has no adequate remedy at law.

103. Unless enjoined by this Court, each of the Defendants will continue to infringe Plaintiff's patent rights and cause Plaintiff further irreparable injury.

IX. COUNT VI

INFRINGEMENT OF THE '607 PATENT

104. Plaintiff incorporates by reference and realleges each of the allegations set forth in Paragraphs 1-103 above.

105. Each of the Defendants knowingly and intentionally infringed the '607 Patent in violation of 35 U.S.C. § 271(a) through, for example, the use, sale, offer for sale, and/or importation into the United States of the Bela MD System during the term of the '607 Patent. Defendant Eunsung has made, used, offered for sale, sold, and imported into the United States the infringing Bela MD System. Defendants Luvo and Clarion have used, offered for sale, sold, and imported into the United States the infringing Bela MD System. Defendant MRP has used, offered for sale, sold, and imported into the United States the infringing Bela MD System.

106. For example, as set forth in the claim chart below, the Bela MD System infringes at least Claim 1 of the '607 Patent.

Claim Language	Bela MD System
1. A skin treatment system, comprising:	<p>To the extent that the preamble is deemed to be a limitation, the Bela MD System is a system for performing a skin treatment procedure.</p> <p>The Luvo website refers to the Bela MD System as a “medical skin health platform” that is “designed to provide improvement in primary skin concerns while addressing the overall health and appearance of the skin.” Exhibit 8 (Luvo Website) at 1. The Clarion website calls the Bela MD System an “[a]dvanced [s]kin [h]ealth [p]latform” that provides a “relaxing, non invasive treatment.” Exhibit 9 (Clarion Website) at 1. The MRP website similarly promotes the Bela MD System as an “[a]dvanced [s]kin [h]ealth [p]latform.” Exhibit 10 (MRP Website) at 1.</p>
(a) a console configured to receive a first container containing a first treatment material	The Bela MD comprises a console configured to receive a first container containing a first treatment material and a second container containing a second treatment material.

and a second container containing a second treatment material,

The image below shows the Bela MD System with a console configured to receive a first container and a second container.

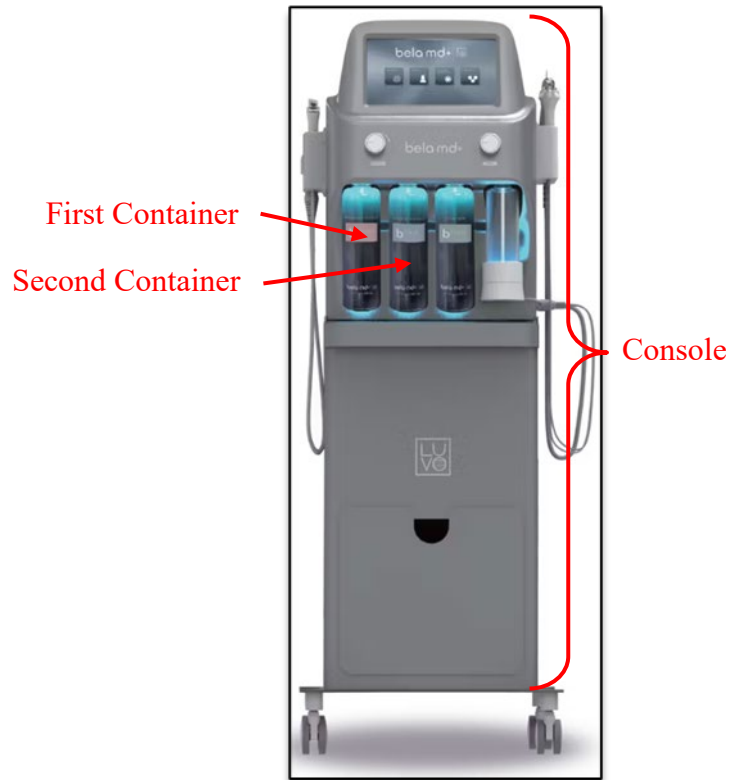


Exhibit 10 at 1; *see also* **Exhibit 8** at 1 (also showing console with manifold); **Exhibit 9** at 1 (same).

Luvo advertises “customizable treatment options and targeted serum solutions” as part of its “comprehensive system [that] helps treat and protect against common skin concerns.” **Exhibit 8** at 2. Clarion advertises its Bela MD System as combining “the latest serum innovations and aesthetic technologies to address a variety of skin conditions and improve overall skin quality.” **Exhibit 9** at 1. Clarion also describes the use of its serums with the “Aqua handpiece,” stating that “BELA MD bio-infusion serum or hydrogen water is emitted from the central aperture of the Aqua tip and infused into the skin along the contact path. Remaining solution dissolves any impurities, then exits through the waste inlet port.” *Id.* at 2. The “serum solutions” of the Bela MD are first and second treatment materials contained in the first and second containers, respectively.

(b) a handpiece configured to couple to a tip that can be pressed against skin to perform skin treatment;

The Bela MD System comprises a handpiece configured to couple to a tip that can be pressed against skin to perform skin treatment.

The Luvo, Clarion, and MRP websites show the Bela MD System with a handpiece:

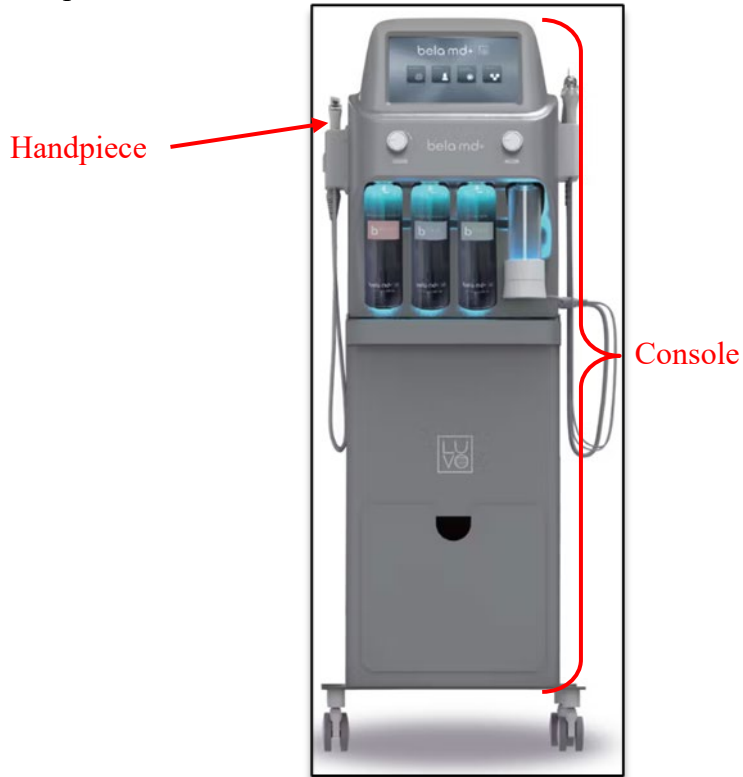


Exhibit 10 at 1. The Clarion website explains that the Bela MD System has a “Aqua handpiece and Aqua tip.” **Exhibit 9** at 2. The Bela MD System’s aqua handpiece and aqua tip form “a closed loop system,” where “BELA MD bio-infusion serum or hydrogen water is emitted from the central aperture of the Aqua tip and infused into the skin along the contact path.”

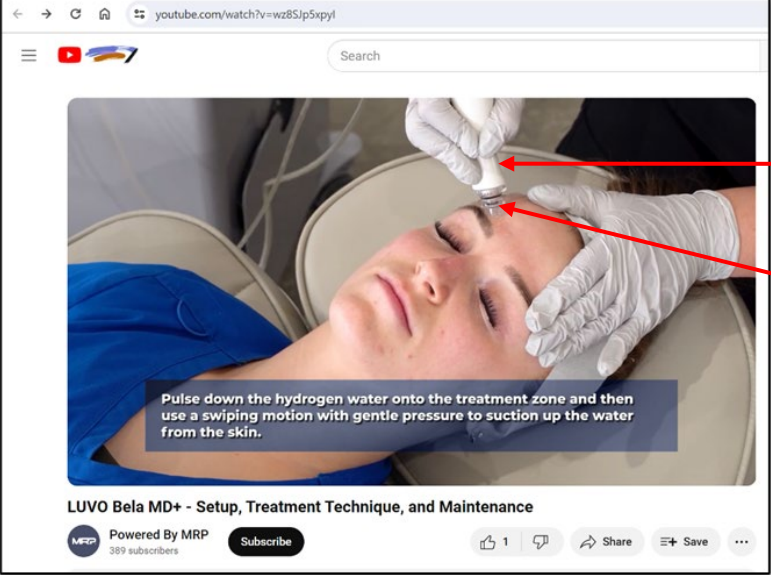
Infusion with Aqua handpiece and Aqua tip

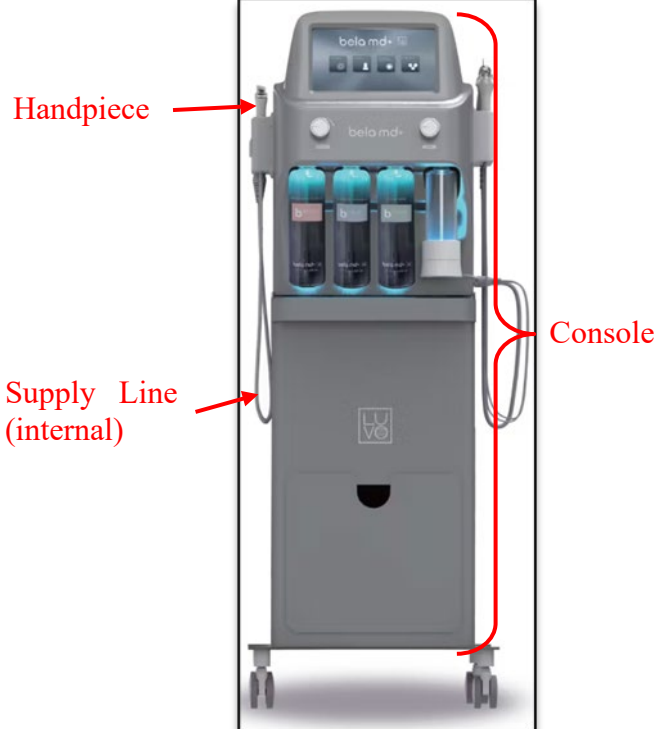
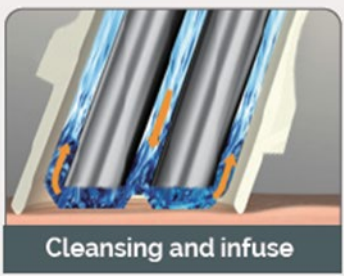
The Aqua handpiece is a closed looped system. BELA MD bio-infusion serum or hydrogen water is emitted from the central aperture of the Aqua tip and infused into the skin along the contact path. Remaining solution dissolves any impurities, then exits through the waste inlet port. The BELA MD+ touchscreen interface allows for easy and precise adjustments of vacuum & flow levels.



Id.

The MRP setup, operation, and maintenance video instructs the user of the Bela MD System to couple the tip to the handpiece, and have the tip press against the skin of a subject during a skin treatment to perform the skin treatment.

	 <p>Handpiece</p> <p>Tip</p> <p>Exhibit 12 at 2.</p>
<p>(b)(i) a supply line connected between the handpiece and the console for sequentially delivering treatment material to the handpiece from the first container or the second container;</p>	<p>The Bela MD System comprises a supply line connected between the handpiece and the console for sequentially delivering treatment material to the handpiece from the first container or the second container.</p> <p>As shown in the image below, the Bela MD System comprises a supply line connected between the handpiece and the console.</p>

	 <p>Exhibit 10 at 1.</p> <p>Luvo’s brochure advertises the Bela MD System’s aqua handpiece as having serum infused “through the aqua tip while it simultaneously removes waste with radial rotation and vacuum suction.”</p>  <p>Cleanse & infuse</p> <p>Serum is infused through the aqua tip while it simultaneously removes waste with radial rotation and vacuum suction.</p> <p>Exhibit 11 at 4.</p> <p>The MRP setup, operation, and maintenance video shows that the BELA MD sequentially delivers treatment material to the handpiece from the first container or the second container via a supply line. For example, the user can select to turn on the vacuum source and place the tip of the handpiece assembly against the skin, causing the Bela MD System to draw fluid from the containers through the supply line to the handpiece.</p>
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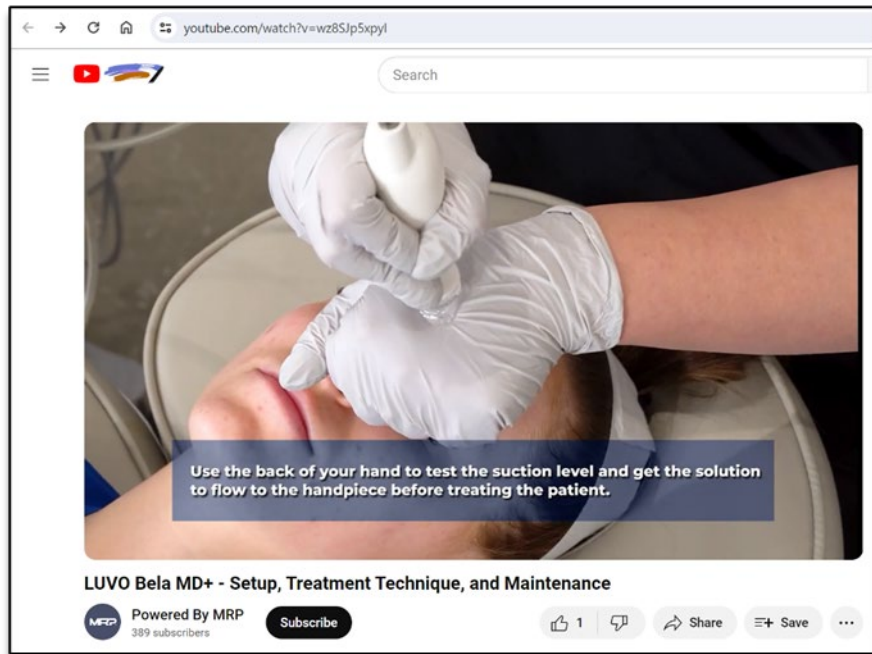


Exhibit 12 at 3.

The MRP setup, operation, and maintenance video also shows the user delivering a first treatment fluid contained in the first container and the second treatment fluid contained in the second container sequentially by selecting buttons associated with these containers.

Button to select first container

Button to select second container

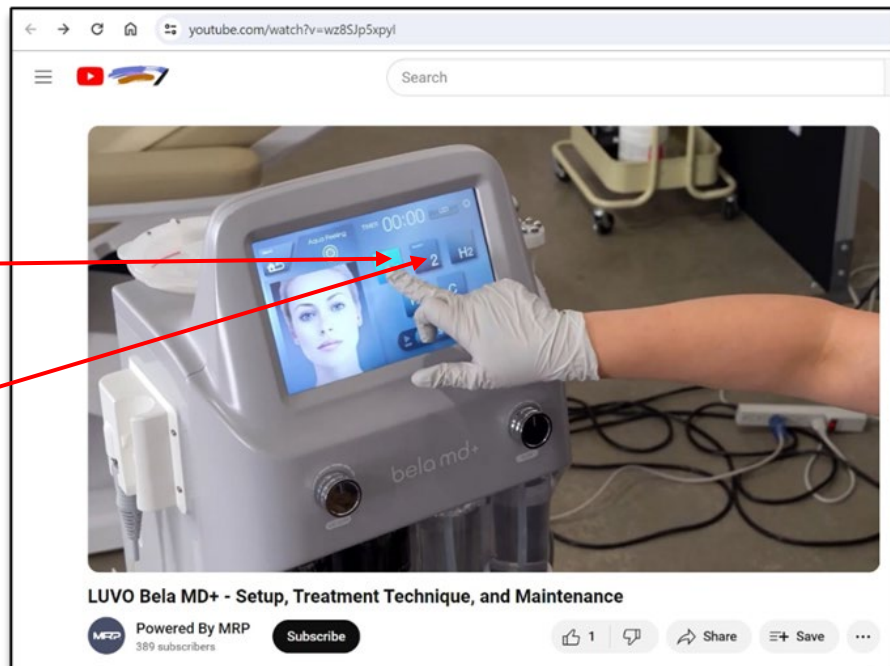


Exhibit 12 at 2.

(c) a waste line connected between the handpiece and the console; and

The Bela MD System comprises a waste line connected between the handpiece and the console.

As shown in the image below, the Bela MD System comprises a waste line connected between the handpiece and the console.

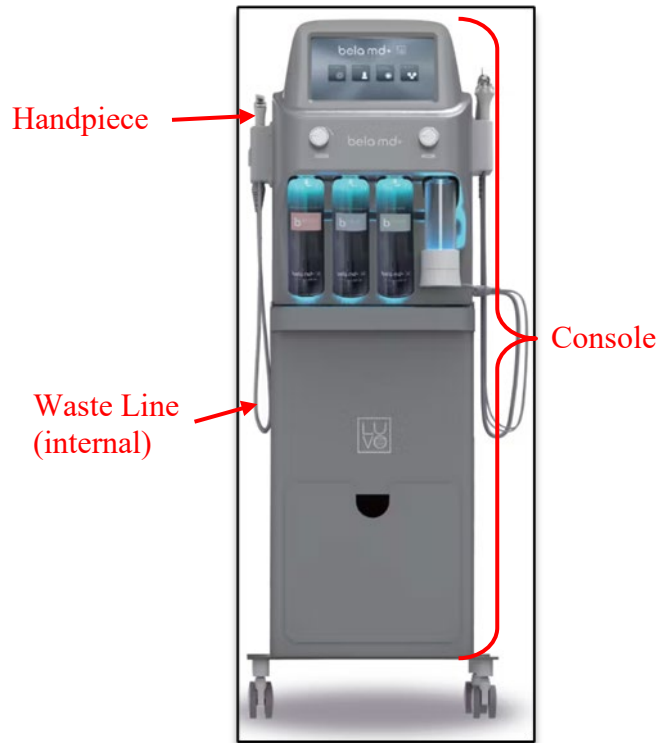


Exhibit 10 at 1.

The Clarion website indicates that the handpiece draws spent treatment fluid and waste away from the skin through the waste conduit via a “waste inlet port.”

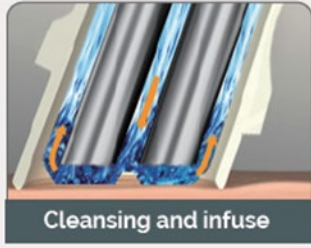

Infusion with Aqua handpiece and Aqua tip

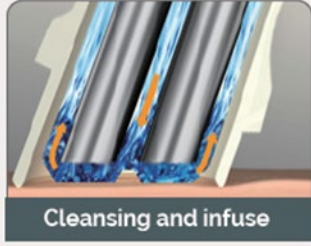

The Aqua handpiece is a closed looped system. BELA MD bio-infusion serum or hydrogen water is emitted from the central aperture of the Aqua tip and infused into the skin along the contact path. Remaining solution dissolves any impurities, then exits through the waste inlet port. The BELA MD+ touchscreen interface allows for easy and precise adjustments of vacuum & flow levels.



Exhibit 9 at 2.

Luvo’s brochure advertises the Bela MD System’s aqua handpiece as having serum infused “through the aqua tip while it simultaneously removes waste with radial rotation and vacuum suction.”

	<div data-bbox="625 296 1312 604" style="border: 1px solid black; padding: 10px;">  <p style="text-align: center;">Cleansing and infuse</p> <p>Cleanse & infuse</p> <p>Serum is infused through the aqua tip while it simultaneously removes waste with radial rotation and vacuum suction.</p> </div> <p>Exhibit 11 at 4.</p>
<p>(d) a vacuum source configured to create a vacuum that draws waste material from the handpiece through the waste line for disposal and</p>	<p>The Bela MD System comprises a supply conduit placing the manifold of the console in fluid communication with the handpiece assembly, wherein the distal end of the supply conduit is configured to couple to the handpiece assembly.</p> <p>As explained above, the Bela MD System comprises (a) a handpiece configured to be coupled to a tip that can be pressed against skin to perform skin treatment, and (b) a waste line connected between the handpiece and the console. <i>See</i> limitations 1[b], 1[c], <i>supra</i>.</p> <p>The Clarion website indicates that the Bela MD System has a vacuum source, as the Bela MD System “allows for easy and precise adjustments of vacuum and flow levels.” Exhibit 9 at 2. The Clarion website further indicates that the handpiece draws spent treatment material and waste away from the skin through the waste line via a “waste inlet port.”</p> <div data-bbox="516 1209 1422 1388" style="border: 1px solid black; padding: 5px;"> <p>Infusion with Aqua handpiece and Aqua tip</p> <p>The Aqua handpiece is a closed looped system. BELA MD bio-infusion serum or hydrogen water is emitted from the central aperture of the Aqua tip and infused into the skin along the contact path. Remaining solution dissolves any impurities, then exits through the waste inlet port. The BELA MD+ touchscreen interface allows for easy and precise adjustments of vacuum & flow levels.</p>  </div> <p>Exhibit 9 at 2.</p> <p>Similarly, the Luvo website states that the Bela MD System’s “Aqua Cleansing handpiece” simultaneously cleanses and removes waste and debris “through strong radial rotation paired with vacuum suction.” Exhibit 8 at 2.</p> <p>Luvo’s brochure advertises the Bela MD System’s aqua handpiece as having serum infused “through the aqua tip while it simultaneously removes waste with radial rotation and vacuum suction.”</p>

	<div data-bbox="625 294 1312 604" style="border: 1px solid black; padding: 10px;">  <p style="text-align: center;">Cleansing and infuse</p> <p>Cleanse & infuse</p> <p>Serum is infused through the aqua tip while it simultaneously removes waste with radial rotation and vacuum suction.</p> </div> <p>Exhibit 11 at 4.</p>
<p>(d)(i) that draws treatment material from either the first container or the second container to the handpiece when the tip is pressed against skin.</p>	<p>The Bela MD’s vacuum source draws treatment material from either the first container or the second container to the handpiece when the tip is pressed against skin.</p> <p>As described above, the vacuum source creates a vacuum that draws waste material from the handpiece through the waste line for disposal. <i>See</i> limitation 1[d], <i>supra</i>. The vacuum source also draws treatment material from the first container or the second container to the handpiece via the supply line when the tip is pressed against the skin.</p> <p>Luvo advertises that the Bela MD “delivers targeted Bio-infusion serum through the center of the tip, <i>simultaneously</i> cleansing and removing waste and debris.” Exhibit 8 at 2 (emphasis added). To accomplish this, the Bela MD uses “strong radial rotation paired with vacuum suction.”</p> <div data-bbox="678 1276 1258 1747" style="border: 1px solid black; padding: 10px;">  <p>Aqua cleansing & exfoliation</p> <p>BELAS Aqua Cleansing handpiece delivers targeted Bio-infusion serum through the center of the tip, simultaneously cleansing and removing waste and debris through strong radial rotation paired with vacuum suction. The level of exfoliation can be customized to suit treatment needs.</p> </div> <p>Exhibit 8 at 2.</p> <p>Luvo’s brochure advertises the Bela MD’s aqua handpiece as having</p>

serum infused “through the aqua tip while it *simultaneously* removes waste with radial rotation and vacuum suction.”

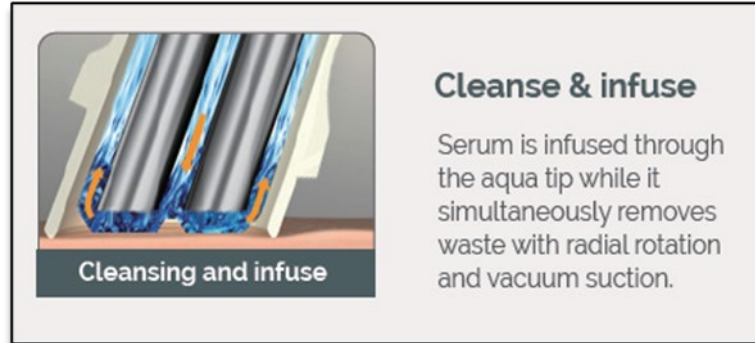


Exhibit 11 at 4 (emphasis added).

The MRP video shows that, when the user turns on the vacuum source and places the tip of the handpiece assembly against the skin, the Bela MD draws fluid from the first container or the second container to the tip via the supply line.

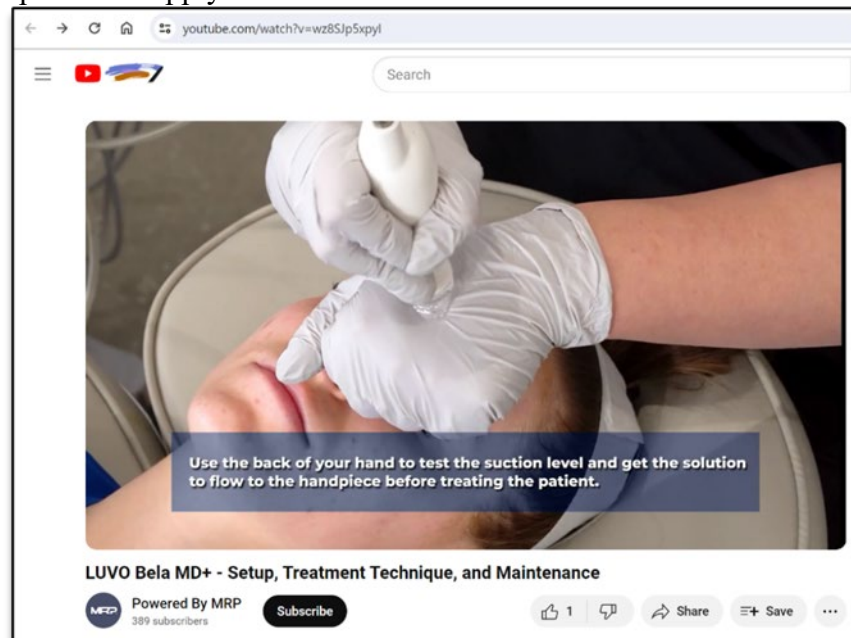


Exhibit 12 at 3.

107. Each of the Defendants Luvo, Clarion, MRP, and Eunsung are liable under 35 U.S.C. § 271(b) for actively inducing others to infringe the '607 Patent because, among other

things, each of the Defendants has marketed, sold, and offered for sale, and continues to market, sell, and offer for sale, the accused hydrodermabrasion products and components thereof knowing and intending that such hydrodermabrasion products would be assembled or used by customers and end users in a manner that infringes at least Claim 1 of the '607 Patent. *See Exhibits 8–11*. For example, upon information and belief, Defendants Luvo and Clarion provided and provide instructions and information to its customers and end users of the accused hydrodermabrasion products and components thereof, encouraging assembly and use of the accused hydrodermabrasion products and components thereof in a manner that infringes the '607 Patent. *See* <https://luvomedical.com/about-luvo/> (last visited July 2, 2024) (**Exhibit 20**) (“We work with passionate physicians who share in our goal, and provide the support, training and resources they need to grow their practices and provide the best in patient care.”); <https://www.clarionmedical.com/services/clinical-training> (last visited July 2, 2024) (**Exhibit 21**) (“We provide an integrated approach to clinical education, from demonstration to in-service training, not only on the technical aspects of your system but on procedure and best practices.”). Similarly, Defendant MRP provided and provides instructions and information to its customers and end users of the accused hydrodermabrasion products and components thereof, encouraging assembly and use of the accused hydrodermabrasion products and components thereof in a manner that infringes the '607 Patent. *See Exhibits 12 and 13*. Upon information and belief, Defendant Eunsung provided and provides instructions and information to its customers and end users of the accused hydrodermabrasion products and components thereof, encouraging assembly and use of the accused hydrodermabrasion products and components thereof in a manner that infringes the '607 Patent.

108. Further, customers and users have assembled and/or used the accused hydrodermabrasion products and components thereof in a manner that infringes the '607 Patent (and continue to do so). *See Exhibits 12 and 13* (providing training and explanation videos for use of the Bela MD System).

109. Each of the Defendants Luvo, Clarion, MRP, and Eunsung is liable for contributory infringement under 35 U.S.C. § 271(c) because, among other things, each of the Defendants has sold or offered for sale, and continues to sell and/or offers for sale within the United States and/or has imported and continues to import into the United States, the accused hydrodermabrasion products and components thereof constituting material parts of the invention of at least Claim 1 of the '607 Patent, that are not staple articles or commodities of commerce suitable for substantial non-infringing use. *See supra; Exhibits 8–14*. Each of the Defendants has and continues to so act, knowing that the accused hydrodermabrasion products and components thereof are especially made for or adapted for use in an infringement of the '607 Patent. *See Exhibits 12 and 13*. Further, customers and users have assembled and/or used the accused hydrodermabrasion products and components thereof in a manner that infringes the '607 Patent (and continue to do so). *See Exhibits 12 and 13* (providing training and explanation videos for use of the Bela MD System).

110. As a direct and proximate result of Defendants' acts of infringement, each of the Defendants has derived and received gains, profits, and advantages. Plaintiff has been damaged by each of the Defendants' activities, in an amount to be determined at trial, but in no event less than a reasonable royalty.

111. Each of the Defendant's infringement has been and continues to be willful.

Pursuant to 35 U.S.C. § 284, Plaintiff is entitled to damages for Defendants' infringing acts and treble damages together with interests and costs as fixed by this Court.

112. This is an exceptional case. Pursuant to 35 U.S.C. § 285, Plaintiff is entitled to reasonable attorneys' fees for the necessity of bringing this action.

113. Due to the aforesaid infringing acts, Plaintiff has suffered irreparable injury, for which Plaintiff has no adequate remedy at law.

114. Unless enjoined by this Court, each of the Defendants will continue to infringe Plaintiff's patent rights and cause Plaintiff further irreparable injury.

X. PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for the following relief:

A. A judgment in favor of Plaintiff and against each of the Defendants on all claims alleged herein;

B. A judgment that each of the Defendants has infringed the '052 Patent, '641 Patent, '642 Patent, '477 Patent, '287 Patent, and '607 Patent under 35 U.S.C. § 271;

C. A preliminary and permanent injunction enjoining each of the Defendants, their officers, directors, agents, servants, employees, and attorneys, and those persons in active concert or participation with each of the Defendants, from (1) making, using, selling, offering to sell, and/or importing into the United States the Bela MD System, and (2) infringing the Asserted Patents in violation of 35 U.S.C. § 271;

D. An accounting of all of each of the Defendant's gains, profits, and advantages derived from each of their infringement of the Asserted Patents in violation of 35 U.S.C. § 271;

E. An Order that each of the Defendants pay to Plaintiff actual damages in the form of

lost profits, or, in the alternative, other damages adequate to compensate for the infringement, but in no event less than a reasonable royalty for the use made of the patented inventions by each of the Defendants, in accordance with 35 U.S.C. § 284;

F. An order finding that Defendant's infringement has been willful and trebling or otherwise increasing damages pursuant to 35 U.S.C. § 284 because of Defendant's willful infringement;

G. An order finding this case exceptional under 35 U.S.C. § 285 and ordering each of the Defendants to pay Plaintiff its reasonable attorneys' fees incurred in this action;

H. An award of pre-judgment and post-judgment interest and costs as fixed by the Court; and

I. Such other and further relief as this Court may deem just and proper.

XI. DEMAND FOR JURY TRIAL

Plaintiff HydraFacial LLC hereby demands a trial by jury of all issues so triable.

Dated this 16th day of August, 2024.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

/s/Ali S. Razai

Ali S. Razai

Benjamin J. Everton

Christian D. Boettcher

KUNZLER BEAN & ADAMSON, PC

/s/Chad S. Pehrson

Chad S. Pehrson

Stephen Richards

Attorneys for Plaintiff Hydrafacial LLC