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FILED
CLERK, U.S. DISTRICT COURT
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CENTRAL DISTRICT OF CALIFORNIA
BY: cla DEPUTY

5 Attorney for Plaintiff
JINGUANG WEN
6
7

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

10 JINGUANG WEN, an individual,
11 Plaintiff,

Case No. 2:24-cv-00745-JWH-SK

FILED UNDER SEAL PURSUANT TO COURT ORDER

12 v.

**FIRST AMENDED COMPLAINT
FOR PATENT INFRINGEMENT;
UNFAIR BUSINESS PRACTICES,
AND INJUNCTIVE RELIEF**

13 GLOSSY AUTO PARTS
14 PROFESSIONAL VW PARTS
STORE; REPLACEMENT NEW
15 PARTS STORE; SHOP1100087148
STORE; GELUOXI SPARE PARTS
16 STORE; RVWORLD STORE;
WEONEFIT-AUTOPARTS;
17 LAMERTO-JYT-US, 枫岚STUDIO;
MOTOR SPARES
18 MARKETPLACE; SMSL-US;
REMINNBER; XTEVU; JQNUS-US;
19 MIZUCCO C; HUSEIFER;
ZILONOU-US; YISTEEL-US;
20 JINWZER-US; QIANLIYI;
NEUFDAY; HENSERI;
21 APPLIANPARDIRECT;
REWEGOD; MATEISY8;
22 CHEZIJUJ-US; LOZAKOMW;
ZENXIUE-US; LING20-11-US;
23 XUEDOBEY-US;
AUTOPARTMASTER;
24 HEXAUTOPARTS;
FOREVERUNAUTO; KEMPAS;
25 AFTERMARKET-PARTS-
HEAVEN; ZKAUTO_13;
26 ZKAUTO_16; FIRST-RATE-
PARTS1; GAPAUTOPARTS;
27 ZKAUTO_14; BLUEJACKS-Z;
ZKAUTOPARTS_12;
28 BGZHOME_1;
ZKAUTOSHOP_10;

REQUEST FOR JURY TRIAL

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MOTOR WORLD558;
AUTOPARTS11ST; AUTO-PART-
SOLUTION; AUTOPARTS-
BUTLER; FITHOOD;
LIXINDA CO. LTD.; OXOTTA
TECH CO. LTD.; LEEIKOO TECH
CO. LTD.; DEELLEEO CO. LTD.;
AIKENDIRECT; MUSTROD
AUTO; and DOES 1 through 100.

Defendants.

Plaintiff, Jinguang Wen, (Plaintiff) hereby alleges as follows against the individuals, corporations, limited liability companies, partnerships, unincorporated associations, and foreign entities named herein as Defendants (collectively, “Defendants”).

INTRODUCTION

1. This action has been filed by Plaintiff to combat online counterfeiters who trade upon Plaintiff’s reputation and goodwill by selling and/or offering for sale a product which infringes on Plaintiff’s United States Design Patent No. D976,627 S (‘627 Patent).

2. The Defendants create numerous fully interactive online marketplace accounts on Amazon, eBay, Alibaba, (including websites associated with Alibaba.com) and Walmart (collectively, the “Defendant Internet Stores”). The Defendant Internet Stores sell the product that infringes on Plaintiff’s ‘627 Patent. The Defendants also spend substantial funds to advertise on Google Ads. The Defendants then attempt to avoid liability by going to great lengths to conceal both their identities and the full scope and interworking of their illegal infringement operation. Plaintiff is forced to file this action to combat the patent infringement, as well as to protect unknowing consumers from purchasing unauthorized product over the internet. Plaintiff has been and continues to be irreparably damaged through consumer confusion, dilution, and tarnishment of his valuable patent as a result of Defendants’ actions. Plaintiff seeks injunctive and monetary relief.

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JURISDICTION AND VENUE

1
2 3. This cause of action arises under the Act of June 25, 1948, 62 Stat. 931,
3 U.S.C., Title 28, Section 1338(a) for patent infringement.

4 4. This Court has jurisdiction over the claims that arise in this action.

5 5. This Court has personal jurisdiction over the parties based upon their
6 contacts with this forum.

7 6. Venue for these claims is proper in this district pursuant to 28 U.S.C.
8 §1391, and this Court may properly exercise personal jurisdiction over Defendants,
9 because each of the Defendants directly targets consumers in the United States,
10 including California, through operating one or more commercial, interactive internet
11 stores, through which California residents can purchase the infringed product. Each
12 of the Defendants has targeted sales from California residents by operating online
13 stores that offer shipping to the United States, including California, accepting
14 payment in U.S. dollars, and have sold the infringed products to residents of
15 California. Each of Defendants is committing tortious acts in California, is
16 engaging in interstate commerce, and has wrongfully caused Plaintiff substantial
17 injury in the State of California.

PLAINTIFF

18
19 7. Plaintiff, Jinguang Wen, is an individual residing in Edmons,
20 Washington. Plaintiff is the inventor and owner of United States Design Patent No.
21 D976,627 S ('627 Patent). The '627 Patent is a Swivel which is mostly commonly
22 installed in recreational vehicles to allow the passenger seat or driver seat to turn,
23 allowing ease of access in and out of the seat.

24 8. Plaintiff offers for sale and sells its patented product in the state of
25 California, including this district, and throughout the United States. Plaintiff is a
26 member of and manages Amazing Auto, LLC and sells the product through that
27 entity.

28 9. Plaintiff's product is sold through eBay.com, sprinterswivel.com and

1 koolands.com.

2 10. Like many other intellectual property rights owners and licensees,
3 Plaintiff suffers ongoing daily and sustained violations of his intellectual property
4 rights at the hands of infringers, such as Defendants herein.

5 11. Plaintiff is harmed, the consuming public is duped and confused, and
6 the Defendants appropriate substantial profits in connection with the infringing
7 conduct.

8 12. To combat the harm caused by the combined actions of Defendants and
9 others engaging in similar infringing conduct, Plaintiff expends significant resources
10 in connection with its intellectual property enforcement efforts, including legal fees
11 and investigative fees.

12 **DEFENDANTS**

13 13. Defendants have the capacity to be sued pursuant to Federal Rule of
14 Civil Procedure 17(b).

15 14. Defendants are individuals and business entities of unknown makeup,
16 each of whom, either resides and/or operates in China or the United States.
17 Defendants redistribute products from the same or similar sources in those locations,
18 and/or ships their goods from the same or similar sources in those locations to the
19 same or similar shipping and fulfillment centers within the United States to
20 redistribute their products to the consumer.

21 15. Defendants are engaged in business in California but have not
22 appointed an agent for service of process.

23 16. Upon information and belief, Defendants have registered, established,
24 or purchased and maintained their Seller IDs for the Defendants Internet Stores.

25 17. Defendants target their business activities toward consumers
26 throughout the United States, including within this district, through their commercial
27 operations at Amazon.com, Walmart.com, Alibaba.com, and eBay.com under their
28 Seller IDs. Defendants also advertise heavily on Google Ads.

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1 18. Defendants are the past and present controlling forces behind the sale
2 of infringing products of Plaintiff’s ‘627 Patent described hereinbelow.

3 19. Defendants directly engage in unfair competition with Plaintiff by
4 advertising, offering for sale, and selling goods that infringe on Plaintiff’s patent to
5 consumers within the United States and this district through Amazon.com,
6 Walmart.com, Alibaba.com, (including websites associated with Alibaba.com) and
7 eBay.com using, at least, the Seller IDs and additional names, or seller identification
8 aliases not yet known to Plaintiff.

9 20. Defendants have purposefully directed some portion of their illegal
10 activities toward consumers in the State of California through the advertisement,
11 offer to sell, sale, and/or shipment of infringing goods into the State.

12 21. Upon information and belief, Defendants may have engaged in
13 fraudulent conduct with respect to the registration of the Seller IDs by providing
14 false and/or misleading information to Amazon.com, Walmart.com, Alibaba.com,
15 and eBay.com where they offer to sell and/or sell during the registration or
16 maintenance process related to their respective Seller IDs.

17 22. Upon information and belief, many Defendants registered and
18 maintained their Seller IDs for the sole purpose of engaging in illegal counterfeiting
19 activities.

20 23. Upon information and belief, Defendants will likely continue to register
21 or acquire new seller identification aliases for the purpose of selling and offering for
22 sale counterfeits and infringements of Plaintiff’s licensed patent unless preliminarily
23 and permanently enjoined.

24 24. Defendants’ business names, i.e., the Seller IDs, associated payment
25 accounts, and any other alias seller identification names e-commerce stores used in
26 connection with the sale of the infringement of Plaintiff’s ’627 Patent are essential
27 components of Defendants’ online activities and are one of the means by which
28 Defendants further their infringement scheme and cause harm to Plaintiff.

1 25. At all times relevant hereto, Defendants had actual or constructive
2 knowledge of Plaintiff’s ‘627 Patent, including Plaintiff’s exclusive right to use of
3 the ‘627 Patent.

4 **JOINDER OF DEFENDANTS IN THIS ACTION IS PROPER**

5 26. Fifty of the Defendants are the individuals, corporations, limited
6 liability companies, partnerships, unincorporated associations, or unknown entities
7 in China. Four of the Defendants, specifically, ForeveRun Auto, Gapauto parts,
8 HexAutoParts, and Kempas claim to operate in the United States.

9 27. Defendants are promoting, selling, offering for sale, and distributing
10 goods that infringe on Plaintiff’s ‘627 Patent.

11 28. Joinder of all Defendants is permissible based on the permissive party
12 joinder rule of Fed. R. Civ. P. 20(a)(2) that permits joinder of persons in an action as
13 Defendants where any right to relief is asserted against them jointly, severally, or in
14 the alternative with respect to or arising out of the same transaction, occurrence, or
15 series of transactions or occurrences; and common questions of law or fact will arise
16 in the action.

17 29. Joinder of the multiple Defendants serves the interests of convenience
18 and judicial economy, which will lead to a just, speedy, and efficient resolution for
19 Plaintiff, Defendants, and this Court.

20 30. Joinder of the multiple Defendants will not create any unnecessary
21 delay, nor will it prejudice any party. On the other hand, severance is likely to cause
22 delays and prejudice Plaintiff and Defendants alike.

23 31. Joinder of the multiple Defendants is procedural only and does not
24 affect the substantive rights of any Defendant listed thereon.

25 32. This Court has jurisdiction over the Defendants. Venue is proper in
26 this court for this dispute involving the multiple Defendants.

27 33. Plaintiff’s claims against the multiple Defendants are all transactionally
28 related.

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1 34. Plaintiff is claiming infringement of Plaintiff’s ‘627 Patent.

2 35. The actions of all Defendants cause indivisible harm to Plaintiff by
3 Defendants’ combined actions engaging in similar infringing conduct when each is
4 compared to the others.

5 36. All Defendants’ actions are logically related. All Defendants are
6 engaging in the same systematic approach of establishing online storefronts to
7 redistribute the same infringing product, from the same or similar sources while
8 maintaining financial accounts that the defendants can easily drain to avoid any real
9 liability for their actions.

10 37. A majority of the Defendants are located in foreign jurisdictions,
11 specifically China.

12 38. A majority of the Defendants undertake efforts to conceal their true
13 identities from Plaintiff in order to avoid detection for their illegal activities.

14 39. All Defendants take advantage of the anonymity and mass reach of the
15 Internet efforts to sell goods across international borders and violate Plaintiff’s
16 intellectual property rights with impunity.

17 40. All Defendants have registered their Seller IDs with a small number of
18 online platforms for the purpose of selling the Infringing Product.

19 41. All Defendants can easily and quickly transfer or conceal funds in their
20 payment and financial accounts to avoid detection and liability in the event that the
21 Plaintiff’s anti-infringing efforts are discovered, or Plaintiff obtains a monetary
22 award.

23 42. All Defendants violated one or more of the Plaintiff’s intellectual
24 property rights in the United States using common or identical methods.

25 43. All Defendants understand that their ability to profit through
26 anonymous internet stores is enhanced as their numbers increase, even though they
27 may not all engage in direct communication or coordination.
28

COUNT 1

(Patent Infringement)

1
2
3 44. Plaintiff repeats and realleges the allegations contained in the preceding
4 paragraphs of the Complaint as though the same were fully rewritten herein.

5 45. On January 31, 2023, the United States Design Patent No. D976,627 S
6 ('627 Patent) entitled Swivel, was duly and legally issued to Jinguang Wen as the
7 inventor. The '627 Patent depicts, describes, and claims, *inter alia*, an ornamental
8 design for a swivel (Swivel). The Patent is valid, subsisting, and in full force and
9 effect and is owned by Plaintiff. The swivel bracket is mostly commonly installed
10 in vehicles to allow the passenger seat to swivel. True and correct copy of the '627
11 Patent is attached hereto as Exhibit 1.

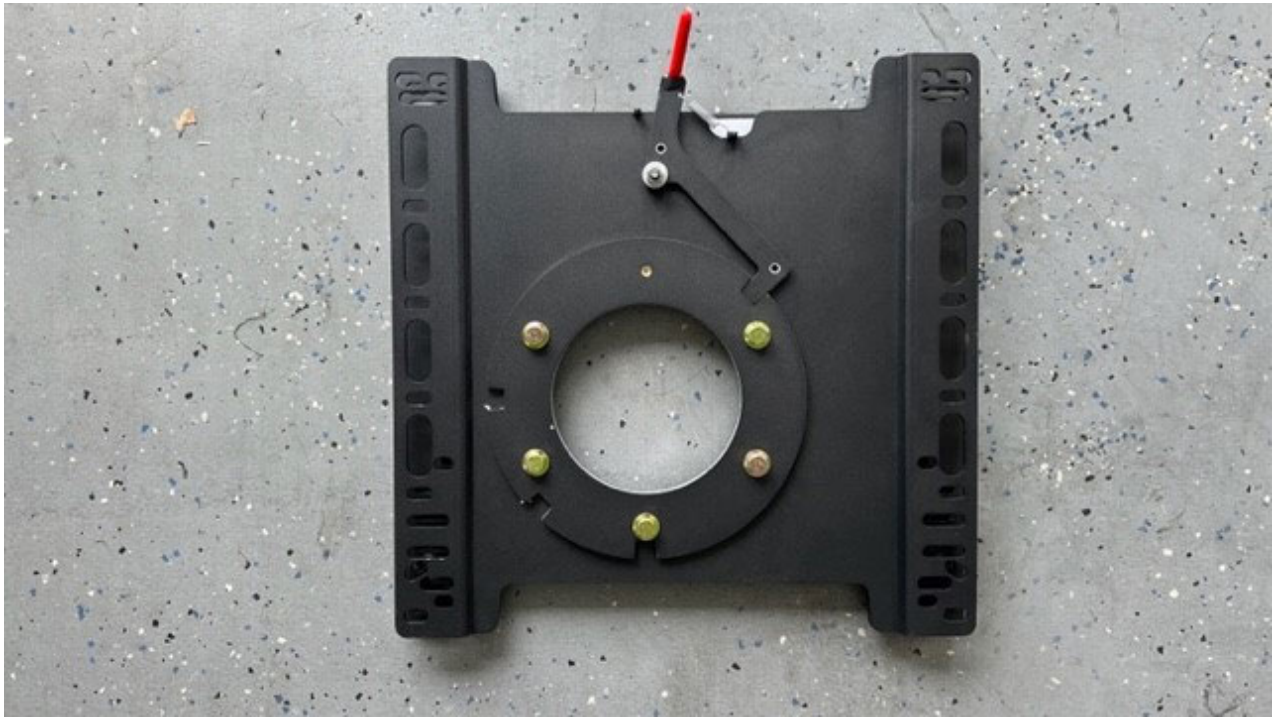
12 46. Since August, 2019, Plaintiff has been manufacturing and selling the
13 Swivel via eBay.com, sprinterswivel.com, and koolands.com. Plaintiff is a member
14 of and manages Amazing Auto, LLC and sells the Swivel through that entity.
15 Plaintiff has expended substantial time, money, and other resources in developing,
16 advertising and otherwise promoting the Swivel through Amazing Auto, LLC.

17 47. In or about 2023, Plaintiff discovered Defendants were infringing on
18 the '627 Patent by manufacturing and selling identical Swivels. Defendants have
19 made, imported, distributed, sold, and/or offered for sale swivels that infringe on the
20 '627 Patent. ("Infringing Product" pictured on the next page) The Infringing Product
21 is imported to, distributed, marketed, and sold within the Central District of
22 California.

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48. Plaintiff notified Amazon, eBay, Walmart, and Alibaba of the ongoing patent infringement. They all refused to take down the listings, absent a court order. Although the Defendants were notified of the patent infringement through Amazon, eBay, Walmart, Alibaba, and Google Ads, they have been and continue to infringe the '627 Patent by making, importing, distributing, selling, offering for sale, and using systems and components embodying the patented invention, and will continue to do so unless enjoined by this Court.

49. Defendants create numerous fully interactive commercial internet stores operating online and using Google Ads or selling platforms such as Amazon, eBay, Alibaba, (including websites associated with Alibaba.com) and Walmart.

50. This action has been filed by Plaintiff to combat online patent infringers who are selling and/or offering for sale products that infringe on Plaintiff's '627 Patent.

51. On information and belief, Defendants expend substantial monies

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1 advertising the Infringing Product in media within the Central District of California,
2 including Google Ads, and in fact so induce substantial numbers of customers
3 within the Central District of California to purchase the Infringing Product.

4 52. On information and belief, at least until the time this First Amended
5 Complaint was drafted, Defendants continue to infringe the ‘627 Patent by
6 distributing and selling or attempting to distribute and sell the Infringing Products
7 on the internet.

8 53. On information and belief, Defendants have acted willfully, knowingly,
9 and deliberately with full knowledge of Plaintiff’s patent rights and in the absence
10 of any good faith basis for a belief of non-infringement or invalidity of the ‘627
11 Patent.

12 54. Defendants are unfairly using the Infringing Product to unfairly
13 compete with Plaintiff and others for space within organic search engine results and
14 social media results, thereby jointly depriving Plaintiff of a valuable marketing and
15 educational tool, which would otherwise be available to Plaintiff and reducing the
16 visibility of Plaintiff’s genuine goods on the internet and across social media
17 platforms.

18 55. Defendants’ infringing activities are likely to cause and are causing
19 confusion, mistake, and deception among members of the trade and the general
20 consuming public as to the origin and quality of Defendants’ individual seller stores
21 at Amazon.com, Walmart.com, Alibaba.com, (including websites associated with
22 Alibaba.com) and eBay.com.

23 56. Defendants’ unlawful actions have caused and are continuing to cause
24 unquantifiable damages to Plaintiff and are unjustly enriching Defendants with
25 profits at Plaintiff’s expense.

26 **COUNT 2**

27 **(Unfair Business Practices - Cal. Bus. Prof. Code § 17200 et seq.)**

28 57. Plaintiff repeats and realleges the allegations contained in the preceding

1 paragraphs of the Complaint as though the same were fully rewritten herein.

2 58. Defendants engaged and continue to engage in violations of
3 California’s Unfair Competition Law, found in California *Business and Professions*
4 *Code § 17200, et seq.* (UCL) by engaging in unfair and unlawful business acts and
5 practices. As result of that conduct, Plaintiff has suffered and continues to suffer
6 injury-in-fact including, without limitation, the infringement of Plaintiff’s patent and
7 ongoing competitive injury.

8 59. Defendants’ business acts and practices are unfair and unlawful within
9 the meaning of the UCL because, without limitation, Defendants are manufacturing,
10 promoting, advertising, distributing, selling, offering for sale a product that infringes
11 on Plaintiff’s ‘627 Patent.

12 60. Defendants are also using inferior product that infringe on Plaintiff’s
13 ‘627 Patent to unfairly compete with Plaintiff for space in search engine and social
14 media results across an array of search terms and visibility on the Internet.
15 Plaintiff’s product is certified by the Department of Transportation.

16 61. Defendants infringing activities are likely to cause and are causing
17 confusion, mistake, and deception among members of the trade and the general
18 consuming public as to the origin and quality of Defendants’ individual seller stores
19 at Amazon.com, Walmart.com, Alibaba.com, (including websites associated with
20 Alibaba.com) and eBay.com.

21 62. Defendants’ unfair business practices have caused and are continuing to
22 cause unquantifiable damages to Plaintiff and are unjustly enriching Defendants
23 with profits at Plaintiff’s expense.

24 **COUNT 3**

25 **(Injunctive Relief)**

26 63. Plaintiff repeats and realleges the allegations contained in the preceding
27 paragraphs of the Complaint as though the same were fully rewritten herein.

28 64. Plaintiff has suffered and will continue to suffer irreparable injury and

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1 damages due to Defendants’ above-described activities if Defendants are not
2 preliminarily and permanently enjoined.

3 65. If not preliminarily and permanently enjoined, Defendants will
4 continue to wrongfully profit from their illegal activities.

5 66. Defendants are likely to transfer or secret their assets to avoid payment
6 of any monetary judgment awarded to Plaintiff.

7 67. Plaintiff has no other adequate remedy at law.

8 68. Plaintiff has been injured by Defendants and Defendants have caused
9 Plaintiff to be damaged in the amount to be proven at trial.

10 JURY REQUEST

11 Pursuant to Federal Rule of Civil Procedure 38, Plaintiff requests a trial by
12 jury on all issues so triable.

13 PRAYER FOR RELIEF

14 WHEREFORE, Plaintiff prays that this Court enter judgment on all Counts
15 and an award of equitable relief and monetary relief against Defendants as follows;

16 1. Entry of Order that Plaintiff’s United States Design Patent No.
17 D976,627 S is valid and enforceable and has been infringed by Defendants;

18 2. Issue a temporary, preliminary, and permanent injunction pursuant to
19 15 U.S.C. § 1116 and Federal Rule of Civil Procedure 65 enjoining Defendants,
20 their individual owners, board members, agents, representatives, servants,
21 employees, subsidiaries, partners, and all those acting in concert or participation
22 therewith, from manufacturing or causing to be manufactured, importing,
23 advertising or promoting, distributing, selling or offering to sell product, which
24 infringes on Plaintiff’s ‘627 Patent.

25 3. Entry of a temporary restraining order, as well as preliminary and
26 permanent injunctions pursuant to 28 U.S.C. § 1651(a), the All Writs Act, and the
27 Court’s inherent authority, enjoining Defendants and all third parties with actual
28 notice of the injunction issued by this Court from participating in, including

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1 providing financial services, technical services or other support to, Defendants in
2 connection with the sale and distribution of products that infringe on Plaintiff's '627
3 Patent.

4 4. Entry of an Order pursuant to 28 U.S.C. § 1651(a), the All Writs Act,
5 and the Court's inherent authority that, upon Plaintiff's request, the operators and/or
6 administrators for the Seller IDs, including but not limited to, Amazon.com,
7 Walmart.com, Alibaba.com, and eBay.com, who are provided with notice of an
8 injunction issued by this Court disable and/or cease facilitating access to the Seller
9 IDs and any other alias seller identification names being used and/or controlled by
10 Defendants to engage in the business of marketing, offering to sell, and/or selling
11 goods that infringe on Plaintiff's '627 Patent,

12 5. Entry of an Order pursuant to 28 U.S.C. § 1651(a), the All Writs Act,
13 and this Court's inherent authority that, upon Plaintiff's request, any messaging
14 service and Amazon.com, Walmart.com, Alibaba.com, and eBay.com operators,
15 administrators, registrar and/or top level domain (TLD) registry for the Seller IDs
16 who are provided with notice of an injunction issued by this Court, identify and
17 provide any email addresses known to be associated with Defendants' respective
18 Seller IDs to Plaintiff.

19 6. Entry of an Order pursuant to 28 U.S.C. § 1651(a), the All Writs Act,
20 and this Court's inherent authority that, upon Plaintiff's request, the operators and/or
21 administrators for the Seller IDs, including but not limited to, Amazon.com,
22 Walmart.com, Alibaba.com, and eBay.com, who are provided with notice of an
23 injunction issued by this Court permanently remove from the multiple platforms,
24 which include, *inter alia*, a direct platform, group platform, seller product
25 management platform, vendor product management platform, and brand registry
26 platform, any and all listings and associated images of good bearing or using
27 counterfeits and/or infringements of Plaintiff's '627 Patent.

28 7. Entry of an Order pursuant to 28 U.S.C. § 1651(a), the All Writs Act,

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1 and this Court’s inherent authority that, upon Plaintiff’s request, the operators and/or
2 administrators for the Seller IDs, including but not limited to, Amazon.com,
3 Walmart.com, Alibaba.com, and eBay.com, who are provided with notice of an
4 injunction issued by this Court permanently remove any and all listings and
5 associated images of good bearing or using counterfeits and/or infringements of
6 Plaintiff’s ‘627 Patent in individual seller stores operating under Seller IDs,
7 including but not limited to the listings and associated images identified by the
8 ‘parent” and/or “child” Amazon Standard Identification Numbers (ASIN) as the
9 Defendants, and upon Plaintiff’s request, any other listings and images of goods
10 bearing or using products that infringe on Plaintiff’s ‘627 Patent that are associated
11 with any ASIN/Product ID linked to the same sellers or linked to any other alias
12 seller identification names being used and/or controlled by Defendants to promote,
13 offer for sale and/or sell the goods bearing and/or using counterfeits and/or
14 infringement of the Plaintiff’s ‘627 Patent.

15 8. Entry of an Order pursuant to 28 U.S.C. § 16521(a), the All Writs Act
16 and this Court’s inherent authority that, upon Plaintiff’s request, Defendants,
17 Amazon.com, Walmart.com, Alibaba.com, and eBay.com operators and/or
18 administrators who are provided with notice of an injunction issued by this Court to
19 immediately cease fulfillment of and sequester all goods in its inventory and
20 possession, custody, or control, and surrender those goods that infringe on Plaintiff’s
21 ‘627 Patent to Plaintiff.

22 9. Entry of an Order requiring Defendants to correct any erroneous
23 impression the consuming public may have derived concerning the nature,
24 characteristics, or qualities of their products, including without limitation, the
25 placement of corrective advertising and providing written notice to the public.

26 10. Entry of an Order that, upon Plaintiff’s request, Defendants and any
27 financial institutions, payment processors, banks, escrow services, money
28 transmitters, or Amazon.com, Walmart.com, Alibaba.com, and eBay.com platforms,

1 and their related companies and affiliates, identify and restrain all funds, up to and
2 including the total amount of judgment, in all financial accounts and/or sub-accounts
3 used in connection with the Seller IDs, or other alias seller identification or e-
4 commerce store names used by Defendants presently or in the future, as well as any
5 other related accounts of the same customer(s) and any other accounts which
6 transfer funds into the same financial institution account(s) and remain restrained
7 until such funds are surrendered to Plaintiff in partial satisfaction of the monetary
8 judgment entered herein.

9 11. Award Plaintiff damages adequate to compensate for the infringement,
10 but in no event less than a reasonable royalty for the use made of the invention by
11 the Defendants, as provided in 35 U.S.C. § 284, together with interest and costs to
12 be determined by the Court;

13 12. Treble the amount of Plaintiff's damages pursuant to the provisions of
14 35 U.S.C. § 284 by reason of willful infringement;

15 13. Award such other and further relief as the Court may deem just and
16 proper.

17 Dated: February 21, 2024

18 By: /s/ Gary F. Wang
19 Gary F. Wang
20 Attorney for Plaintiff, Jinguang Wen
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REQUEST FOR JURY TRIAL

Defendant requests a trial by jury on all jury triable issues in accordance with Rule 38(a) of the Federal Rules of Civil Procedure.

Dated: February 21, 2024

/s/ Gary F. Wang
Gary F. Wang
Attorney for Plaintiff Jinguang Wen

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