

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. _____

Xiamen Vanstar Technology Co., Ltd.,

Plaintiff,

v.

Dezhou Nange Trading Co., Ltd., Shenzhen Qiwei
electronic commerce Co., Ltd., Hui Sun, and Dan Sun,

Defendants.

COMPLAINT

Plaintiff Xiamen Vanstar Technology Co., Ltd. (“Vanstar” or “Plaintiff”), through its undersigned counsel, hereby submits this complaint for utility patent infringement against Defendants Dezhou Nange Trading Co., Ltd., Shenzhen Qiwei Electronic Commerce Co., Ltd., Hui Sun, and Dan Sun (collectively, “Defendants”), and alleges as follows:

NATURE OF THE ACTION

1. This is a civil action arising out of Defendants’ patent infringement in violation of the Patent Law, 35 U.S.C. § 1, et seq., including 35 U.S.C. §§ 271, 281-285.

2. Plaintiff is the exclusive licensee of U.S. Patent No. 11,648,452, titled “Auxiliary Tool for Barbells and Anti-Slip Method for Barbells During Use” (the “452 Patent” or “Asserted Patent”). Defendants’ accused products “Attachment for Barbell” (“Accused Products”) infringe on the ‘452 Patent, which embodies the patented invention that enhances grip security and prevents slippage during barbell exercises, while allows trainers to perform diverse lifting motions without being constrained by the training field, while providing multiple training angles for enhanced workout versatility and effectiveness.

JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction over this case pursuant to the Federal Patent Act, 35 U.S.C. § 101 et seq., and 28 U.S.C. §§ 1331 and 1338.

4. Defendants are subject to personal jurisdiction in this district because they purposefully direct their sales of goods, utilizing Plaintiff’s Patent, to Florida residents by operating stores through online Platforms that offer shipping within the United States, including Florida and this District.

5. Venue is proper in this Court pursuant to 28 U.S.C. § 1391.

THE PARTIES

6. Plaintiff is a limited liability company formed in Xiamen, China. Plaintiff is the exclusive licensee of the ‘452 Patent, having received all substantial rights from the patent owner, Xiamen Shouxi Sports Technology Co., Ltd. The ‘452 Patent was duly issued by the United States Patent and Trademark Office on May 16, 2023. A true and correct copy of the ‘452 Patent is attached as **Exhibit 1**.

7. Upon information and belief, Defendants are individuals and entities incorporated in China. Defendants operate Amazon online stores through Seller Aliases listed below. A true and correct copy of Defendants’ detailed Seller Information is attached as **Exhibit 2**.

Defendants	Seller Aliases	Amazon Store URLs
Dezhou Nange Trading Co., Ltd.	LOYPEXE.	https://www.amazon.com/sp?seller=A22CXO55V2A6BW
Shenzhen Qiwei electronic commerce Co., Ltd	Rivotrance	https://www.amazon.com/sp?seller=AWN3JKXSA4B91
Hui Sun	Yuhqc	https://www.amazon.com/sp?seller=A28X496DQQADXA
Dan Sun	qibylift	https://www.amazon.com/sp?seller=A3KJSWGALQXLWM

8. Defendants are selling similar Accused Products under various Amazon listings, including but not limited to the products listed in the following page. A true and correct copy of product listings is also attached as **Exhibit 3**.

ASINs	ASIN URLs
B0CHMKJX9Y	https://www.amazon.com/dp/B0CHMKJX9Y
B0CZJ2RC3Z	https://www.amazon.com/dp/B0CZJ2RC3Z
B0CZJMZ6DT	https://www.amazon.com/dp/B0CZJMZ6DT
B0CZJMZZZ1	https://www.amazon.com/dp/B0CZJMZZZ1
B0CZJGNLNW	https://www.amazon.com/dp/B0CZJGNLNW

9. Defendants, without any authorization or license from Plaintiff, have knowingly and willfully offered for sale, sold, and/or imported into the United States for subsequent resale or use products that infringe the Patent, and continue to do so via the Defendant Amazon Stores.

10. Each Defendant Amazon Store offers shipping to the United States, including Florida, and has sold Accused Products to Florida, irreparably harming Plaintiff.

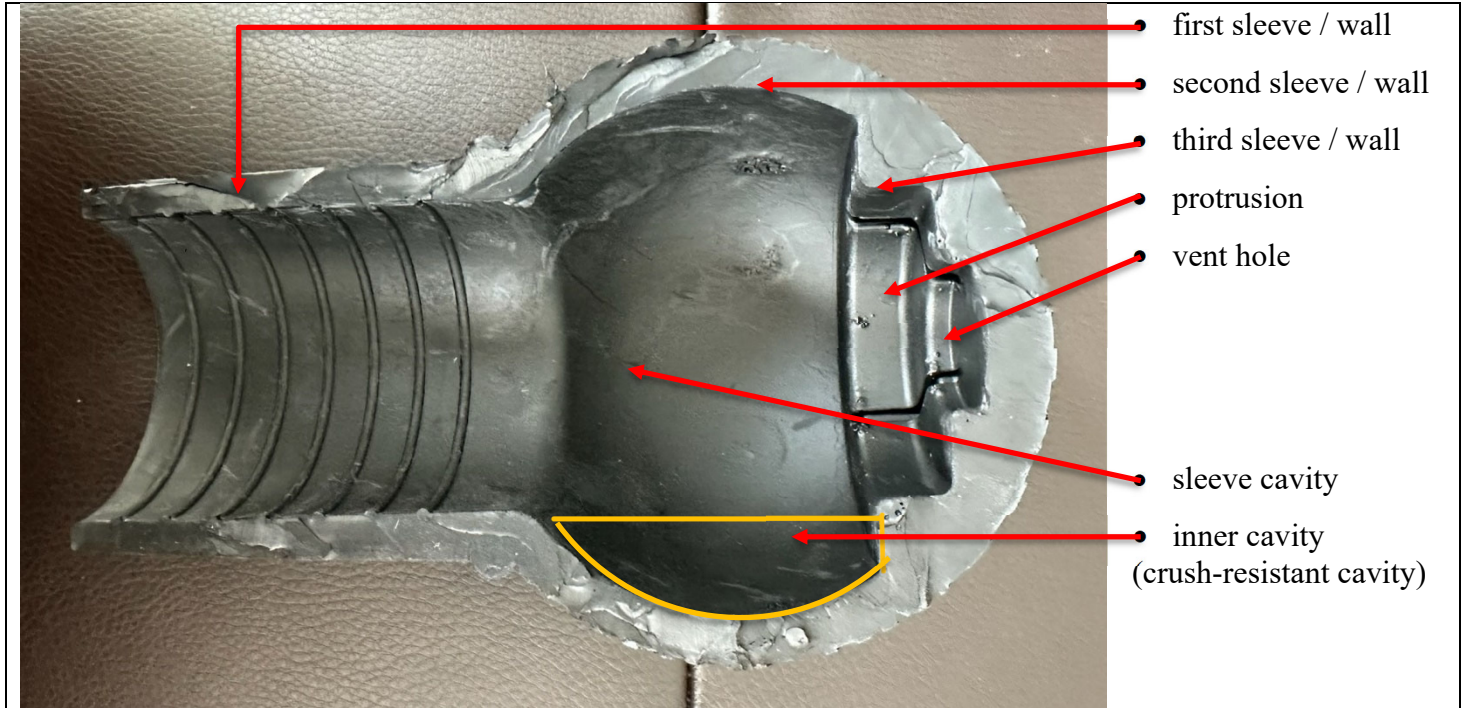
Count I – Patent Infringement of U.S. Patent No. 11,648,452
(35 U.S.C. § 271)

11. Plaintiff incorporates by reference the allegations set forth above in this Complaint as if fully set forth herein.

What is claimed is:

Claim 1. “An auxiliary tool for barbells, the tool comprising

- a sleeve which is composed of a first sleeve, a second sleeve, a third sleeve, a first sleeve wall, a second sleeve wall and a third sleeve wall,
 - wherein the first sleeve wall is sequentially connected to the second sleeve wall and the third sleeve wall to form a complete sleeve cavity,
 - the first sleeve wall and the third sleeve wall cover at least one part of a barbell bar, and
 - the second sleeve wall expands outwards in the sleeve cavity to form an inner cavity;
- wherein when the barbell bar is sequentially inserted through a sleeve opening into the first sleeve, the second sleeve and the third sleeve, the inner cavity is filled with gas to form a crush-resistant cavity; and
- wherein protrusions are formed on an inner wall of the third sleeve, and a vent hole is formed in a bottom wall of the third sleeve.”



12. The above claim chart and analysis reveals that the Accused Products directly infringe the '452 Patent.

13. Defendants' infringing conduct has caused Plaintiff to suffer irreparable harm resulting from the loss of its lawful patent rights to exclude others from making, using, selling, offering for sale, and importing the patented invention.

14. Plaintiff is entitled to injunctive relief pursuant to 35 U.S.C. § 283. Unless a preliminary and permanent injunction is issued enjoining Defendants and all others acting in active concert therewith from infringing the Patent, Plaintiff will continue to be irreparably harmed.

15. Plaintiff is entitled to recover damages adequate to compensate for the infringement, but in no event less than a reasonable royalty for the use made of the invention by Defendants, together with interest and costs as fixed by the court, pursuant to 35 U.S.C. § 284.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

- 1) That Defendants and all of its subsidiaries, affiliates, officers, agents, servants, employees, attorneys, and their heirs, successors and assigns, and all persons acting in concert or participation with it and each of them, be immediately enjoined and restrained, preliminarily and permanently, without bond, from
 - a. manufacturing, distributing, selling or offering to sell in the United States or importing into the United States products infringing the claims of the Asserted Patent; and deliver to Plaintiff all products that infringe the Asserted Patent;
 - b. aiding, abetting, contributing to, or otherwise assisting anyone in infringing upon the Asserted Patent;
 - c. effecting assignments or transfers, forming new entities or associations or utilizing any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth in Subparagraphs (a) and (b).
- 2) Entry of an Order that, upon Plaintiff's request, those with notice of the injunction, including, without limitation, any online marketplace platforms such as Amazon (collectively, the "Third Party Provider") shall disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of goods that infringe Patent claimed in the Asserted Patent;
- 3) A judgment that Defendants has infringed each of the Asserted Patent;
- 4) An award of damages for infringement of the Asserted Patent together with prejudgment interest and costs, said damages to be trebled by reason of the intentional and willful nature of Defendants' infringement, as provided by 35 U.S.C. § 284;

- 5) Costs of suit;
- 6) Finding of the case to be exceptional under 35 U.S.C. § 285, and an award of Plaintiff's reasonable attorneys' fees;
- 7) That any monetary award includes pre- and post-judgment interest at the highest rate allowed by law; and
- 8) Such other relief as the Court may deem just and proper.

Jury Trial Demand

Plaintiff hereby demands a jury trial on all issues so triable.

November 8, 2024,

Respectfully submitted,

/s/ Andrew J. Palmer

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