

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JUNZHOU HUANG

Plaintiff,

v.

Comsmart, Moobona, PANDOLA, ITidyHome,  
Noodoky, and Allxin

Defendants.

Case No. 1:24-cv-11786

JURY TRIAL DEMANDED

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff, Junzhou Huang (“Huang” or Plaintiff), through its undersigned counsel, submits its complaint for patent infringement against the Amazon storefronts doing business as Comsmart, Moobona, PANDOLA, ITidyHome, Noodoky, and Allxin (“Defendants”).

As described below, Defendants Pet/Cat Water Fountain Filter products sold into the United States at least through Amazon.com, the Amazon Warehouse, (collectively “Amazon”), infringe U.S. Patent No. D912,763 (“the ‘D763 Patent’”) either literally or under the doctrine of equivalents. A true copy of the ‘D763 Patent is attached as **Exhibit 1**.

In support of its claims, Plaintiff alleges as follows:

**NATURE OF THE ACTION**

1. This is a complaint for patent infringement arising under the patent laws of the United States, 35 U.S.C. § 1 et seq., including 35 U.S.C. §§ 271, 281, 283, 284, and 285.

**PARTIES**

2. Plaintiff Junzhou Huang is a Chinese Citizen and resident of Guangdong Province, China. Mr. Huang is the named inventor and rightful owner of the ‘D763 patent.

3. Plaintiff's Pet Water Fountain Filters, which embody and practice the 'D763 Design, are offered for sale or sold via online platforms, marketplaces or storefronts, such as Amazon.com.

4. Plaintiff is the rightful owner of all rights, title, and interest in the 'D763 Patent. Plaintiff has not granted a license of the 'D763 Patent to Defendants or any other form of permissions to use or practice the 'D763 Patent to Defendants.

5. On information and belief, Defendants, are Amazon Storefronts and Seller IDs operating from a foreign country, likely from China. On information and belief, Defendants are persons or entities residing in the People's Republic of China or other foreign jurisdictions with no U.S. presence.

6. Defendants have offered to sell, have sold, and continue to sell infringing Pet Water Fountain Filters through their Amazon storefronts throughout the United States. On information and belief, the infringing products are manufactured in China. Defendants conduct business throughout the United States, including within the State of Illinois and this Judicial District through Defendants' Amazon Stores.

### **JURISDICTION AND VENUE**

7. This Court has original subject matter jurisdiction over the claims in this action under 28 U.S.C. §§ 1331, 1337(a) and 1338(a).

8. Venue is proper in this District under 28 U.S.C. § 1391, and this Court may properly exercise personal jurisdiction over Defendants because Defendants directly target consumers in the United States, including Illinois, through at least the fully interactive commercial webpages they operate which are available to consumers throughout the United States, including Illinois, through the website Amazon.com, which hosts the Amazon Marketplace.

9. Specifically, Federal Rule of Civil Procedure 4(k)(2) subjects Defendants to personal jurisdiction in this Court, because Defendants are Chinese or foreign companies that are not subject to personal jurisdiction in any state's courts of general jurisdiction. Exercising jurisdiction over Defendants is consistent with the Constitution and laws of the United States because Defendants actively target and sell products through interstate commerce to United States consumers. The domain Amazon.com is specific to the United States. It is designed to reach United States consumers and targeted towards United States consumers. Defendants market and sell the products at issue to United States consumers through the Amazon Marketplace and thereby directs their infringing and deceptive commercial activities to the United States.

10. Defendants reach out to do business with Illinois residents in this judicial district at least by operating their webstores in the Amazon Marketplace through which Illinois residents can purchase Defendants' infringing products. Product listings do not populate on Amazon.com unless the seller actively creates and posts that listing. Defendants have targeted sales to Illinois residents by operating online stores offering shipping to the United States, including Illinois, accepting payment in U.S. dollars and, on information and belief, selling infringing products to Illinois residents. Plaintiff's distributors compete with Defendants in the Amazon Marketplace. Defendants have committed tortious acts in Illinois while engaging in interstate commerce and has wrongfully caused PLAINTIFF substantial injury in the State of Illinois.

**Plaintiff AND U.S. PATENT NO. D912,763**

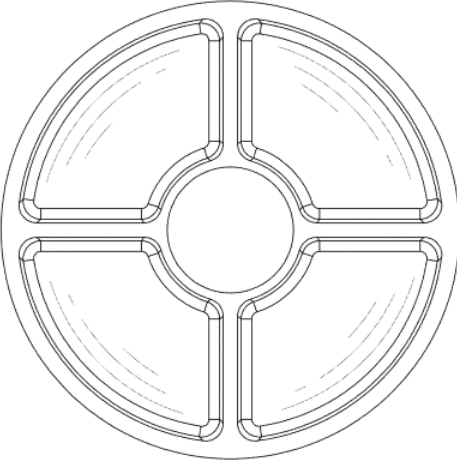
11. U.S. Patent No. D912,763 ("the 'D763 Patent") was duly and legally issued on March 9, 2021. (See **Exhibit 1**). The 'D763 Patent claims priority to CN 201830103598.6, which was filed March 20, 2018.

12. Speaking generally, the ‘D763 patent relates to the ornamental design for a round-shaped filter for a pet fountain, with a hole in its center, and four pockets evenly distributed on its surface, where each pocket is in the shape of a circular sector of 90 degrees.

13. As stated above, Mr. Huang is a Chinese Citizen and resident of Guangdong Province, China. Mr. Huang is the named inventor and patentee of the ‘D763 patent.

14. Mr. Huang now holds scores of patents world-wide, including about a dozen U.S. utility and design patents directed to pet water fountains, pet water drinking devices, and pet water fountain filters.

15. Plaintiff is one of China’s leading manufacturers and suppliers of pet water fountain filters. Plaintiff’s products embody the patented ornamental design of the ‘D763 patent (“Patented Products”).

Patent No.	Patented Design
D912,763	 <p data-bbox="771 1648 885 1701">Fig.1</p>

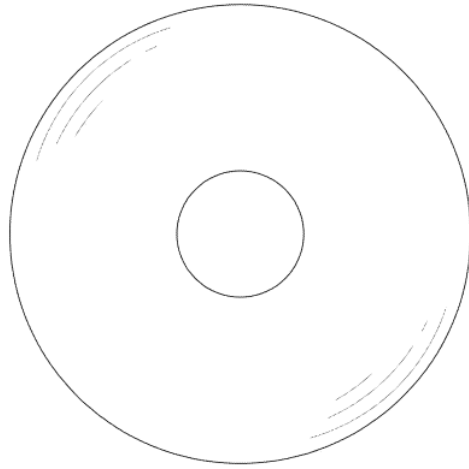


Fig. 2

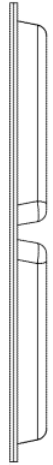


Fig. 3



Fig.4

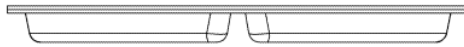
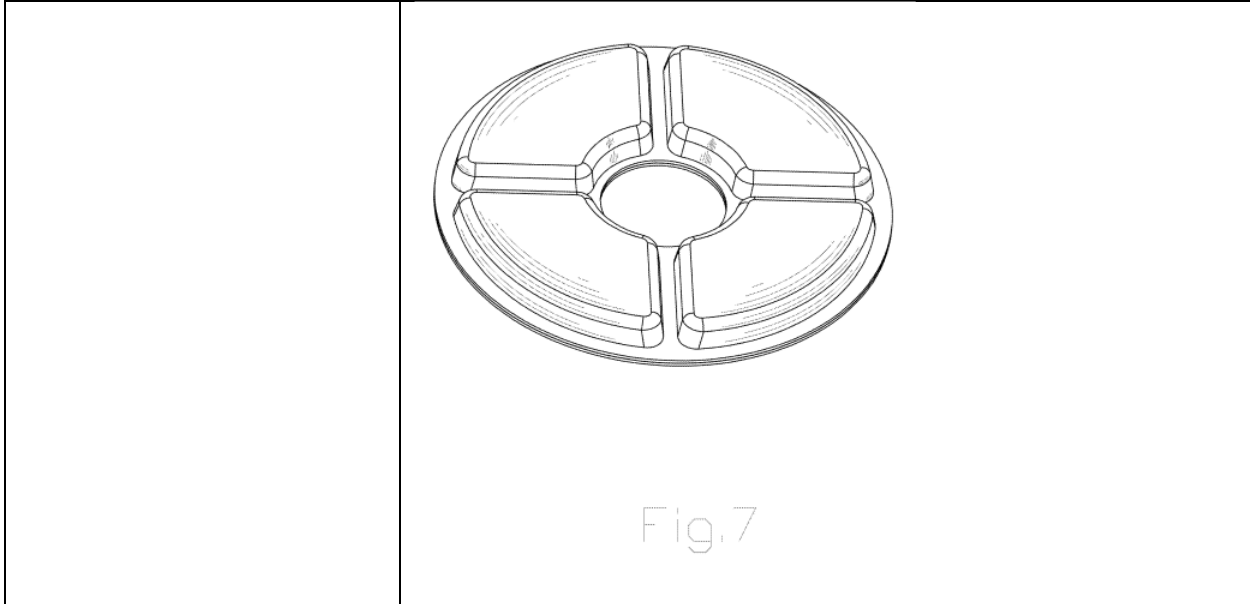


Fig.5



Fig.6



16. Plaintiff is currently supplying the Patented Products to about twenty (20) distributors/retailers across the United States, most of which are Amazon Online Sellers/Storefronts.

17. One example of the Patented Products being sold by Amazon Storefronts is Wonder Creature Cat Water Fountain Filter Replacement (Amazon ASIN: B07MBC5LQ4), which receives quality customer reviews and high ratings (4.7 stars on more than eight thousand reviews). (<https://www.amazon.com/Wonder-Creature-Stainless-Fountain-Activated/dp/B07MBC5LQ4>).

Another example of the Patented Products being sold by Amazon Storefronts is GISOFIK Pet Fountain Replacement Filters (ASIN: B0CZRSMBF6). (<https://www.amazon.com/Fountain-GISOFIK-Replacement-Filtration-Dispenser/dp/B0CZRSMBF6?th=1>)



### **DEFENDANTS' INFRINGING ACTIVITIES**

18. Plaintiff incorporates into this section by reference the allegations in the preceding paragraphs of this Complaint.





19. Defendants, themselves and through parents, divisions, subsidiaries and/or agents

are engaged in the business of manufacturing, marketing, and distributing, and selling a variety of cat/pet water fountain filters. On information and belief, Defendants are now promoting multiple product lines.

20. The infringing Products include at least the following models (See Table below):

Amazon Store Front	Product ASIN <sup>1</sup>	Representative Pictures from Store Front Webpage
Comsmart	B07WGN4WYB  (8 packs)	
	B09FDRPB2V  (12 packs)	
	B09VBWX2DN  (16 packs)	



	B0B42V1V3H (4 packs)	
Moobona (selling Noodoky Product)	B085G7R514 (10 packs)	
PANDOLA	B07ZNCLCXF (8 packs)	
	B07ZNCNDJ7 (12 packs)	

<p>ITidyHome</p>	<p>B083FFQJN7  (12 packs)</p>	
	<p>B0837NQ7HH  (16 packs)</p>	
<p>Noodoky</p>	<p>B088D1R52N  (10 packs)</p>	
	<p>B0983T3S6K  (8 packs)</p>	

<p>Allxin</p>	<p>B08K7NXXD9 (16 packs)</p>	
	<p>B08K7PS4HB (8 packs)</p>	
	<p>B0885Q5TPX</p>	
	<p>B0886CQ7PH</p>	
	<p>B088691CNG</p>	

21. A true and correct copy of Defendants' infringing products as listed in the table of paragraphs 20 is attached hereto as **Exhibit 2**.

22. Defendants infringe the 'D763 Patent in violation of 35 U.S.C. §§ 271 by making, using, offering to sell, selling, and/or importing the infringing pet water fountain filters, because those products are identical or nearly identical to the patented ornamental design of the 'D763 Patent.

23. Defendants' infringing products copy the 'D763 Design. A claim chart comparing the patented ornamental design of the 'D763 Patent with the infringing product is attached hereto as **Exhibit 3**. Notably, even though infringing products were sold through different store fronts of Defendants, their designs present remarkable similarity, if not identity. Even further, almost all of the infringing products utilize similar and rearranged elements in their promotional web pictures, i.e., white cotton/coconut shells, a pile of black activated carbon, a pile of yellow/orange resins, and green leaves. Since the infringing products share a nearly identical infringing ornamental design, only one infringing product of each Defendant is analyzed in the claim chart as a representative.

### **COUNT I:**

#### **(Infringement of Design Patent Under 35 U.S.C. § 271)**

24. Plaintiff restates and incorporates by reference the allegations in the preceding paragraphs as if set forth fully herein.

25. Defendants have manufactured, imported, supplied, distributed, sold, and/or offered for sale the infringing Cat/Pet Water Fountain Filters through Amazon.

26. In view of the foregoing, Defendants' sale of Cat/Pet Water Fountain Filters infringe the 'D763 Patent under 35 U.S.C. § 271(a).

27. Defendants' infringement of the 'D763 Patent is ongoing and will continue unless and until enjoined by this Court.

28. Defendants' infringement has caused and, unless restrained by this Court, will continue to cause monetary damage to Plaintiff in an amount to be proven at trial. Plaintiff is entitled to be compensated by Defendants in an amount no less than a reasonable royalty, together with interest and costs pursuant to 35 U.S.C. §§ 284 and 289.

29. Defendants' infringement has caused and will continue to cause, serious and irreparable harm to Plaintiff for which Plaintiff has no adequate remedy at law unless Defendants are temporarily, preliminarily, and permanently enjoined by this Court from further infringement of the 'D763 Patent pursuant to 35 U.S.C. § 283.

#### **PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff respectfully prays for judgment and relief as follows:

- A. Entering judgment that Defendants have infringed the 'D763 Patent;
- B. Ordering that Defendants, their officers, directors, employees, agents, affiliated entities, and all parties in active participation or in privity with them, be temporarily, preliminarily, and permanently enjoined and restrained from infringing the 'D763 Patent;
- C. Ordering that, upon Plaintiff' request, all in privity with Defendants and with notice of the injunction, including but not limited to any online marketplace platforms, such as Alibaba, Ali Express, Amazon, DH Gate, eBay, Newegg, Shopify, Wish, and vendors of sponsored search terms or online ad-word providers, financial services providers, including but not limited to credit card providers, banks, merchant account providers, third party payment processors, web hosts, and Internet search engines, such as Google, Bing, and Yahoo shall:
  - a. disable and cease providing services being used by Defendants, currently or in

the future, to engage in the sale of goods that infringe the ‘D763 patent;

b. disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of infringing goods using the ‘D763 patent; and

c. take all steps necessary to prevent links to the Defendants Amazon Store from displaying in search results, including, but not limited to, removing links to the Defendants’ Amazon Store from any search index;

D. Ordering Defendants to pay damages to Plaintiff adequate to compensate it for the infringement described in this Complaint, together with interest and costs;

E. Awarding Plaintiff enhanced damages for Defendants’ wrongful conduct in an amount three times the actual damages proven at trial;

F. Declaring this case exceptional and awarding Plaintiff its reasonable attorney fees; and,

G. Granting Plaintiff all other legal and equitable relief the Court finds just and proper.

### **DEMAND FOR JURY TRIAL**

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff hereby demands a trial by jury for all claims and issues that are triable by right.

Date: November 15, 2024

Respectfully submitted,

By: /s/ Yichen Cao  
Yichen Cao

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