

11. Defendants' sale and offering for sale of infringing products to consumers in Illinois constitutes tortious conduct directed at Illinois and has caused injury to Plaintiff in this District.
12. Defendants have established sufficient minimum contacts with Illinois such that the exercise of personal jurisdiction over them comports with due process and does not offend traditional notions of fair play and substantial justice.
13. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) and (c) because Defendants are subject to personal jurisdiction in this District and a substantial part of the events giving rise to Plaintiff's claims occurred in this District.
14. Venue is also proper pursuant to 28 U.S.C. § 1391(c)(3) because, upon information and belief, certain Defendants reside outside the United States and may be sued in any judicial district.

PARTIES

Plaintiff

15. Plaintiff NextClimb Investments LLC is a limited liability company organized and existing under the laws of the State of Delaware, with its mailing address at 532 Herrmann Drive, Monterey, California 93940, United States.
16. Plaintiff is the owner of United States Trademark Registration No. 5,903,064 for the standard character mark NEXTCLIMB in International Class 19 for, inter alia, non-metal vent cover for HVAC ducts and non-metal vent covers for roof deck protrusions, drains and pitch pans (the "NextClimb Mark"). The registration was issued on November 5, 2019, on the Principal Register of the United States Patent and Trademark Office. The NextClimb mark consists of standard characters without claim to any particular font style, size, or color. The NextClimb mark was first used in commerce on May 2, 2019.