

targeted sales to Illinois residents by setting up and operating e-commerce stores that target United States consumers, offer shipping to the United States, including Illinois, accept payment in U.S. dollars and, on information and belief, sell products which infringe Plaintiff's design patent, as described below, (collectively, the "Infringing Products") to residents of Illinois. Each of the Defendants is committing tortious acts in Illinois, is engaging in interstate commerce, and has wrongfully caused Plaintiff substantial injury in the state of Illinois.

INTRODUCTION

3. Plaintiff filed this case to prevent e-commerce store operators who infringe upon Plaintiff's patented design by making, using, offering for sale, selling, and/or importing into the United States for subsequent sale or use of the same unauthorized and unlicensed product, namely the Kids Camera, that infringe Plaintiff's United States Patent No. D1,082,732S. Plaintiff has filed this action to combat Defendants' infringement of their patented design, as well as to protect unknowing consumers from purchasing Infringing Products over the Internet. Plaintiff has been and continues to be irreparably damaged from the loss of their lawful patent rights to exclude others from making, using, selling, offering for sale, and importing their patented design as a result of Defendants' actions and seeks injunctive and monetary relief.

THE PARTIES

4. Plaintiff, Xiuling Li, is an individual residing at No. 23, Qianbei Lane 5, Kehu Village, Kehu Village Committee, Jiadong Town, Lufeng City, Guangdong Province, China, and is the owner of the Patent asserted in this action.

5. Plaintiff is the owner of all right, title, and interest in U.S. Patent No. US D1,082,732S (herein after "Plaintiff's Design Patent" or "Asserted Design Patent"). A true