

18. Defendants have transacted business with consumers located in the United States, including New York and this Judicial District, for the sale and shipment of Counterfeit Products.

19. Venue is proper in this Court pursuant to at least 28 U.S.C. §§ 1391(b)(2) and 1400(a) because Defendants have committed acts of trademark and/or patent infringement in this Judicial District and do substantial business in this Judicial District.

THE PLAINTIFF

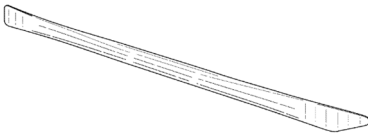
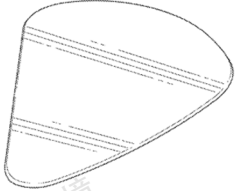
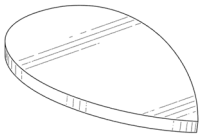
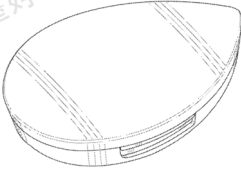
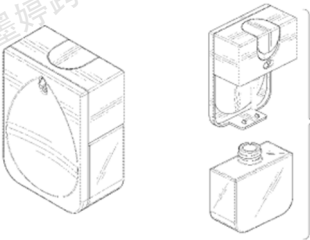
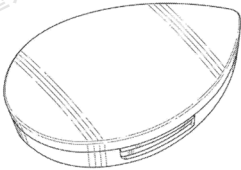
20. Plaintiff REA.DEEMING BEAUTY is a corporation organized and existing under the laws of California with its principal place of business in Pennsylvania.

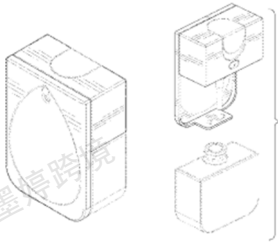
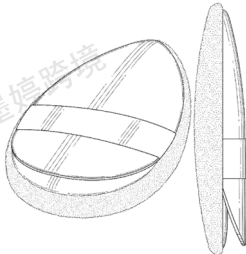
21. Plaintiff is the registered owner of the REA.DEEMING BEAUTY Trademarks (attached as **Exhibit 1**), as follows:

U.S. TM Reg. No.	Trademark	Registration Date
2,945,105	BEAUTYBLENDER	April 26, 2005
3,190,049	BLENDERCLEANSER	December 26, 2006
4,570,128	solid	July 15, 2014
4,614,408	sur.face	September 30, 2014
4,719,164	beautyblender	April 14, 2015
4,719,170		April 14, 2015
4,719,175		April 14, 2015
4,908,115	MAKEUP'S BEST FRIEND	March 1, 2016
4,908,116	BODYBLENDER	March 1, 2016
5,628,998	BOUNCE	December 11, 2018
5,629,037		December 11, 2018

U.S. TM Reg. No.	Trademark	Registration Date
5,657,490	INSTACLEAN	January 15, 2019
5,668,153	BEAUTYBLUSHER	February 5, 2019
5,686,296	BLENDER DEFENDER	February 26, 2019
5,700,378	KEEP.IT.CLEAN	March 19, 2019
5,765,814	GLASS GLOW	May 28, 2019
5,956,096	BEAUTYBLENDER	January 7, 2020
5,956,097	BEAUTY BLENDER	January 7, 2020
6,263,629		February 9, 2021
6,263,630		February 9, 2021
6,836,059		September 6, 2022
6,846,824	POWER PUFF	September 13, 2022
6,880,957	BIOPLUSH	October 18, 2022
7,800,976	BLOTTERAZZI	May 20, 2025

22. Plaintiff is also the registered owner of the REA.DEEMING BEAUTY Patents (attached as **Exhibit 2**), as follows:

U.S. Patent Number	Claim	Issue Date
US D785238 S		April 25, 2017
US D788977 S		June 6, 2017
US D800961 S		October 24, 2017
US D800966 S		October 24, 2017
US D846997 S		April 30, 2019
US D850005 S		May 28, 2019

U.S. Patent Number	Claim	Issue Date
US D852058 S		June 25, 2019
US D861245 S		September 24, 2019
US D866864 S		November 12, 2019
US D878674 S		March 17, 2020
US D882169 S		April 21, 2020

U.S. Patent Number	Claim	Issue Date
US D895202 S		September 1, 2020
US D921988 S		June 8, 2021
US D1042968 S		September 17, 2024

THE DEFENDANTS

23. Defendants are individuals and business entities who, upon information and belief, reside mainly in the People's Republic of China or other foreign jurisdictions.

24. Defendants are merchants on online e-commerce platforms, including the Marketplace Platforms.