

popularity of Stanley 1913 products, which are sold online and in retail outlets worldwide, counterfeits have flooded online marketplaces.

2. This action has been filed by Plaintiffs to combat online counterfeiters who trade on Plaintiffs' reputation and goodwill by selling and/or offering for sale products in connection with Plaintiffs' Stanley-related registered trademarks, which include but are not limited to the following: U.S. Trademark Registration Nos. 643,096; 4,640,026; 5,846,339; and 7,405,350 (collectively, "Plaintiffs' Trademarks"). Plaintiffs' Trademarks are valid, subsisting, and in full force and effect. True and correct copies of the federal trademark registration certificates for Plaintiffs' Trademarks, as well as the assignment agreement for U.S. Trademark Registration No. 643,096 are attached as **Exhibit 1**.

3. This is also an action for patent infringement to combat e-commerce store operators who trade upon Plaintiffs' reputation and goodwill by making, using, offering for sale, selling and/or importing into the United States for subsequent sale or use, unauthorized and unlicensed products that infringe Plaintiffs' granted design patents, which include but are not limited to the following: U.S. Patent Nos. US D805,838 S and US D1,092,146 S ("Plaintiffs' Patents"). Plaintiffs' Patents are valid, subsisting, and in full force and effect. Plaintiff PMI is the owner and lawful assignee of all right, title, and interest in and to Plaintiffs' Patents, which were duly and legally issued by the U.S. Patent and Trademark Office. A true and correct copy of Plaintiffs' Patents are attached as **Exhibit 2**.

4. Defendants are improperly advertising, marketing, and/or selling unauthorized and illegal products by reference to marks identical or substantially identical to Plaintiffs' Trademarks and/or that embody the design(s) depicted in Plaintiffs' Patents (the "Counterfeit Products").

delivery in the United States, including New York and this Judicial District, as a means for establishing regular business with the United States, including New York and this Judicial District.

19. 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.

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

THE PLAINTIFFS

21. Plaintiff Pacific Market International, LLC is a limited liability company organized and existing under the laws of Washington with its principal place of business in Seattle, Washington.

22. Plaintiff PMI WW Brands, LLC is a limited liability company organized under the laws of Delaware with its principal place of business in Seattle, Washington.

23. Plaintiff PMI is the owner of Plaintiffs' Trademarks (attached as Exhibit 1), as follows:

<u>Registration No.</u>	<u>Trademark</u>	<u>Registration Date</u>
643,096		Mar. 26, 1957
4,640,026		Nov. 18, 2014
5,846,339		Aug. 27, 2019

7,405,350	QUENCHER	Jun. 4, 2024
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24. Plaintiff PMI is the owner of Plaintiffs' Patents (attached as Exhibit 2), as follows:

<u>Patent No.</u>	<u>Patent</u>	<u>Issue Date</u>
US D806,838 S		Dec. 26, 2017
US D1,092,146 S		Sep. 9, 2025

PLAINTIFFS' PRODUCTS

25. The very first Stanley products were developed in 1913. PMI acquired the Stanley brand in 2002 and has launched many successful products since then to become a leading manufacturer of assorted drinkware, foodware, and mobility and storage products, which