

importing into the United States for subsequent sale or use, unauthorized and unlicensed products that infringe Plaintiffs' U.S. Patent No. 12,593,855 (the "Asserted Patent").

2. The Asserted Patent is valid, subsisting, and in full force and effect. Plaintiff SharkNinja Operating LLC is the owner and lawful assignee of all right, title, and interest in and to the Asserted Patent, which was duly and legally issued by the United States Patent and Trademark Office and SharkNinja Sales Company is an exclusive licensee of the Asserted Patent. A true and correct copy of the Asserted Patent is attached hereto as Exhibit 2.

3. Each of the Defendants directly and/or indirectly imports, develops, designs, manufactures, distributes, markets, offers to sell, and/or sells products infringing the Asserted Patent (the "Infringing Products") in the United States, including in this Judicial District, and otherwise purposefully direct infringing activities to this District in connection with the Infringing Products. Specifically, each Infringing Product infringes the Asserted Patent. *See* Exhibits 3-30. Defendants conduct their infringing marketing and sales activities through their numerous fully interactive commercial Internet e-commerce stores operating under the online marketplace accounts and Seller IDs (collectively, the "Defendants' Internet Stores").

4. Plaintiffs' genuine SharkNinja products and specifically, the Ninja SLUSHi Professional Frozen Drink Maker, Ninja SLUSHi XL Smart Frozen Drink Maker, and Ninja SLUSHi Max Smart Frozen Drink Maker (collectively, "SLUSHi" or the "SharkNinja Products"), rely on and incorporate the advancements claimed in the Asserted Patent. The Infringing Products sold on Defendants' Internet Stores also incorporate and rely on those claimed advancements while selling inferior imitations of the SLUSHi.

5. The Internet Stores share unique identifiers, such as design elements and similarities among their Infringing Products offered for sale, establishing a logical relationship