

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 HOMEANDBEYOND STORE LLC is a limited liability company organized and existing under the laws of the State of Florida, with its mailing address at 14344 Golden Rain Tree Blvd, Orlando, Florida 32828, United States.
16. Plaintiff is the owner of United States Trademark Registration No. 7,560,817 for the standard character mark HOME AND BEYOND STORE in International Class 6 for door handles of metal, door stops of metal, and metal door handles (the "Home And Beyond Store Mark"). The registration was issued on November 5, 2024, on the Principal Register of the United States Patent and Trademark Office. The Home And Beyond Store Mark consists of standard characters without claim to any particular font style, size, or color. The Home And Beyond