

38. Upon information and belief, Defendants are likely to transfer or hide their assets to avoid payment of any monetary judgment awarded to Plaintiff.

39. Given the likelihood that Defendants will simply transfer money from their accounts and open new product listings to continue selling the Infringing Products, Plaintiff has no adequate remedy at law. Plaintiff is suffering irreparable injury and has suffered substantial damages as a result of Defendants' unauthorized and wrongful infringement of at least one claim of the Asserted Patent.

40. The harm and damages sustained by Plaintiff has been directly and proximately caused by Defendants' Infringement of the Asserted Patent in the United States.

COUNT I:

DEFENDANTS' DIRECT INFRINGEMENT OF U.S. PATENT NO. D774,846

41. Plaintiff realleges and incorporates by reference paragraphs 1-40, inclusive, as though fully set forth herein.

42. Defendants have directly infringed, and continue to infringe, the claimed design of the [REDACTED]. (See Exhibit 2, a claim chart comparing the claimed Design of the [REDACTED] to each of the Infringing Products sold by Defendants).

43. Plaintiff's [REDACTED] claims a design for a [REDACTED].

44. Defendants' Infringing Products are nearly identical to the claimed design; he overall configuration of Defendants' Infringing Products is substantially identical to the claimed design.

45. Defendants offer for sale, sell, and import into the United States for subsequent resale or use Infringing Products that infringe directly and/or indirectly the ornamental design claimed in the Patent. (See Exhibit 4, Defendants' Online Storefront).