

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

HK SANLI TRADING CO., LTD,

Plaintiff,

v.

Hongyan Wang,

Defendant.

Civil Action No.: 26-cv-2292

JURY TRIAL DEMAND

COMPLAINT FOR DECLARATORY JUDGMENT

Plaintiff HK SANLI TRADING CO., LIMITED (“Plaintiff”) brings this complaint against Hongyan Wang (“Defendant”), and alleges as follows:

NATURE OF THE ACTION

1. This is an action for declaratory judgment of non-infringement and invalidity arising under the patent laws of the United States, 35 U.S.C. § 100 *et seq.* and the United States Declaratory Judgment Act, 28 U.S.C. §§ 2201 and 2202.

2. Plaintiff seeks this relief in response to Defendant's recent accusation of patent infringement as to the U.S. Patent No. 12,478,181 (the “’181 Patent”). A true and correct copy of the ’181 Patent is attached as Exhibit A.

3. On February 13, 2026, Amazon sent a notice to Plaintiff regarding a complaint submitted by Defendant under Amazon's intellectual property enforcement program. The complaint