

FACTUAL ALLEGATIONS

A. The '791 Patent

13. On February 13, 2024, the United States Patent and Trademark Office duly and lawfully issued the '791 Patent, entitled "Anus Cleaner," naming Haiyong Ruan as inventor and Ningbo Dianai Plastic Co., Ltd. as assignee. The '791 Patent issued from U.S. Application No. 17/375,001, filed July 14, 2021, and claims priority to German Application No. 202020105434.1, filed September 23, 2020.