

establishing regular business with the United States, including New York and in this Judicial District.

17. Defendants have transacted business with consumers located in the United States, including New York and in this Judicial District, for the sale and shipment of Counterfeit Products.

18. Venue is proper in this Court pursuant to at least 28 U.S.C. §§ 1391(b)(2) because Defendants have committed acts of trademark infringement in this Judicial District and do substantial business in the Judicial District.

THE PLAINTIFF

19. MELLING is a corporation organized under the laws of Michigan with its principal place of business in Jackson, Michigan.

20. Plaintiff is the exclusive owner of the MELLING Trademarks as follows:

U.S. TM Reg. No.	Description	Registration Date
1,535,190		Apr. 18, 1989
1,548,193	MELLING	Jul. 18, 1989

U.S. TM Reg. No.	Description	Registration Date
1,715,488		Sep. 15, 1992
7,500,212	M295	Sep. 10, 2024

THE DEFENDANTS

21. Defendants are individuals and business entities who, upon information and belief, reside mainly in the People's Republic of China.

22. Defendants are merchants on online e-commerce platforms, including the Marketplace Platforms.

THE MELLING PRODUCTS

23. MELLING is a leading manufacturer of aftermarket automotive combustion engine internal components. The well-known and long-established MELLING Engine Parts brand traces its origins to 1946, when the Company first developed and launched its initial product line of internal engine oil pumps. Since that time, MELLING has continually released new internal engine component products, which today encompasses a comprehensive range of automotive parts—from oil pumps to camshafts, valve train parts, and other components which are replaced in automotive engine upkeep. The company excels at designing high-quality, engaging products that cater to a wide range of aftermarket replacement component needs.