

infringement of Plaintiff's patent, as well as to protect unknowing consumers from purchasing the Infringing Products over the Internet. Plaintiff has been and continues to be irreparably harmed by Defendants' infringement of Plaintiff's patent; therefore, Plaintiff seeks injunctive relief to halt such infringement and irreparable harm. Plaintiff also seeks monetary relief for the injury it has sustained and is sustaining. In support thereof, Plaintiff states as follows:

NATURE OF THE ACTION

1. Shenzhen Ji'an Health Technology Co., Ltd. is a Chinese limited company that owns the design patent asserted in this case, which is issued by the United States Patent and Trademark Office. Shenzhen currently sells products embodying its patented design on various online storefronts ("Plaintiff's Products"), and has licensed the design to other stores, all of which generates a considerable amount of revenue.

2. Shenzhen's design patent protects the innovative design of its proprietary body massager and is issued by the United States Patent and Trademark Office under patent number D1,050,475 (the "Patented Design") with an issue date of November 5, 2024.

3. A true and correct copy of the registration for the Patented Design is attached as Exhibit 1.

4. After obtaining the registration for the Patented Design, Shenzhen conducted an internet inquiry and discovered that the Defendants were selling products that displayed the Patented Design to market and sell their infringing products, despite having no license or authorization to use the Patented Design.

5. On information and belief, Defendants' infringing activities of offering for sale, marketing, and selling Infringing Products embodying Shenzhen's Patented Design arise from the same transaction, occurrence, or series of transactions. Specifically, on information and belief,