

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

Zhongshan Besway Technology Co., Ltd.,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS, and UNINCORPORATED
ASSOCIATES IDENTIFIED ON
SCHEDULE "A",

Defendants.

Civil Action No.: 26-cv-6031

JURY TRIAL DEMAND

VERIFIED COMPLAINT

Plaintiff Zhongshan Besway Technology Co., Ltd. ("Plaintiff"), by and through its undersigned counsel, brings this action against the individuals, corporations, limited liability companies, partnerships, and unincorporated associations identified in the attached Schedule A (collectively, "Defendants") for infringement of Plaintiff's United States design patent rights.

INTRODUCTION

1. Plaintiff brings this action to stop the unlawful advertisement, offer for sale, sale, and importation of products that infringe Plaintiff's patented design for a single bed frame for kids. Defendants operate e-commerce storefronts through online marketplaces and use those storefronts to advertise, offer for sale, and sell unauthorized products ("Unauthorized Products") that embody the ornamental design protected by Plaintiff's United States Design Patent No. D1,115,368 S.

2. Defendants' Unauthorized Products are offered under online marketplace listings directed to consumers in the United States, including consumers in Illinois. Defendants' listings