

locations, and the full scope and interworking of their infringing operation. Plaintiff is forced to file this action to combat Defendants' infringing of their patented design and trade dress, as well as to protect consumers from purchasing Unauthorized Products over the internet. Plaintiff has been, and continue to be, irreparably damaged through loss of market share and erosion of Plaintiff's patent and trade dress rights because of Defendants' actions and therefore seek injunctive and monetary relief.

III. THE PARTIES

4. Plaintiff is a Chinese company having a principal place of business at 1207, NO. 12, LANE 2, LIANJING SIMING DISTRICT, XIAMEN, FUJIAN, CHINA.

5. Plaintiff is the sole owner of U.S. Design Patent No. D1,080,919 S through an assignment from Jianqun Zhang on July 20, 2022 ("the 'D919 Patent' Exhibit A) entitled "Ladder Stabilizer" issued on June 24, 2025 to Jianqun Zhang from U.S. Patent Application No. 29/846,848, filed on July 20, 2022.

6. On information and belief, Defendants, either individually or jointly, operate one or more e-commerce stores under the Seller Aliases listed in Schedule A attached hereto. Tactics used by Defendants to conceal their identities and the full scope of their operation make it virtually impossible for Plaintiff to learn Defendants' true identities and the exact interworking of their infringing network. The identity of the infringing products from these defendants further demonstrate the interrelationship among them. If Defendants provide additional credible information regarding their identities, Plaintiff will take appropriate steps to amend the Complaint.

IV. PLAINTIFF'S PATENT

7. Plaintiff is the owner of all right, title, and interest in the ‘D919 Patent which is valid and enforceable at all times relevant to this action and is entitled to a presumption of validity under 35. U.S.C. § 282.

8. The ‘D919 Patent discloses and claims new ornamental design for Ladder Stabilizer which are represented by Figures 1-8 in the ‘D919 Patent. Plaintiff sells its products that embody the ‘D919 Patent (collectively, “Plaintiff’s Products”), exclusively direct-to-consumer through its webstore(s) on Amazon and other online platforms.

9. The claim of the ‘919 Patent is directly compared with those of each Defendant on Schedule A and are shown in Exhibit B to demonstrate that Defendants copied Plaintiff’s design claimed in the ‘D919 Patent.

V. PLAINTIFF’S TRADE DRESS

10. Plaintiff protects its substantial investment in innovation and design from imitators with its intellectual property rights.

11. In addition to embodying the ‘D919 Patent, Plaintiff’s Products bear a distinctive trade dress in the design of Plaintiff’s Products. *See* Figures 1-8 of the ‘D919 Patent in Exhibit A.

12. As a result of Plaintiff’s widespread use and display of the trade dress, 1) the public has come to recognize Plaintiff’s Products bearing the trade dress as emanating from Plaintiff; 2) the public recognizes that products bearing the trade dress constitute high quality products that conform to the specifications created by the Plaintiff; and 3) the trade dress has established strong secondary meaning and extensive goodwill.

13. Plaintiff’s trade dress is not functional. The design features embodied by the trade dress are not essential to the function of the product. The trade dress is not in its particular shape