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9 Attorneys for Plaintiff  
10 WONDERLAND NURSERYGOODS CO.,  
11 LTD.

12 UNITED STATES DISTRICT COURT  
13 CENTRAL DISTRICT OF CALIFORNIA  
14

15 WONDERLAND  
16 NURSERYGOODS CO., LTD.,

17 Plaintiff,

18 v.

19 BABY TREND, INC., DENNY  
20 TSAI, and BETTY TSAI,

21 Defendants.  
22

Case No.

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**JURY TRIAL DEMANDED**

23 Plaintiff Wonderland Nurserygoods Co., Ltd. (“Wonderland”), for its  
24 complaint against Defendants Baby Trend Inc. (“Baby Trend”), Denny Tsai and  
25 Betty Tsai, alleges the following:

26 **THE PARTIES**

27 1. Wonderland is a corporation organized and existing under the laws  
28 of Taiwan and has its principal place of business at Rui Kuang Road, No. 433,

1 10th Floor, Neihu, Taipei, Taiwan.

2 2. Wonderland was established in 1983 to focus on the global demand  
3 for baby products, strollers, cribs, play yards, car safety seats and high chairs.  
4 Wonderland is an innovator in the baby product field and designs, engineers, and  
5 produces high quality baby products.

6 3. Wonderland and related entities own more than 130 U.S. patents and  
7 over 800 patents outside of the U.S., including U.S. Patent No. RE43,919  
8 asserted in paragraphs 13-28 below.

9 4. Upon information and belief, Baby Trend is a business entity  
10 organized and existing under the laws of California and is headquartered at  
11 1607 S. Campus Avenue, Ontario, California 91761.

12 5. Upon information and belief, Denny Tsai and Betty Tsai are  
13 officers of Baby Trend and residents in this district.

14 6. Baby Trend, Denny Tsai and Betty Tsai (collectively “the  
15 Defendants”) are serial infringers of Wonderland’s patents.

16 7. This Court entered judgment on May 21, 2014, against the  
17 Defendants on Wonderland’s claims that the Defendants infringed  
18 Wonderland’s U.S. Pat. Nos. 7,625,043 and 7,600,775 and were enjoined from  
19 further selling products that infringe those patents.

20 **JURISDICTION AND VENUE**

21 8. This is an action for patent infringement arising under the Patent  
22 Laws of the United States, Title 35 of the U.S. Code.

23 9. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331  
24 and 1338.

25 10. This Court has personal jurisdiction over Baby Trend.

26 11. This Court has personal jurisdiction over Denny Tsai and Betty  
27 Tsai.

28 12. Venue is proper in this judicial district under 28 U.S.C. §§ 1391

1 and 1400(b).

2 **COUNT ONE: INFRINGEMENT OF U.S. PATENT NO. RE43,919**

3 13. The allegations of paragraphs 1-12 are incorporated for this Count  
4 One as though fully set forth herein.

5 14. U.S. Patent No. RE43,919 (“the ‘919 Patent”), entitled “Baby Crib,”  
6 was duly and legally issued by the United States Patent and Trademark Office on  
7 January 15, 2013, to inventor Shun-Min Chen and has been duly and legally  
8 assigned to Wonderland. A copy of the ‘919 Patent is attached as Exhibit 1.

9 15. On March 20, 2012, Wonderland was awarded judgment against Qing  
10 Yang, Baby Trend’s supplier in China. Qing Yang’s manufacture of Baby Trend  
11 play yards, including the Deluxe Nursery Center line, was found to infringe China  
12 Pat. No. CN2680127Y from Application No. 2004200018045 to which the ‘919  
13 Patent claims priority.

14 16. On information and belief, Wonderland, Denny Tsai, and Betty Tsai  
15 have been aware of the finding of infringement against Qing Yang.

16 17. On April 24, 2014, Baby Trend and Wonderland met in Los Angeles,  
17 California, during which time Wonderland’s counsel and Denny Tsai were  
18 presented the ‘919 Patent and informed that at least the Baby Trend Deluxe  
19 Close & Cozy Nursery Center Playard (“Deluxe Playard”) infringed the ‘919  
20 Patent.

21 18. Baby Trend sells the Deluxe Playard as part of its Deluxe Nursery  
22 Center line nationwide at stores including at least Walmart and Amazon.com.

23 19. Wonderland sells products that are protected by its ‘919 Patent,  
24 including the following branded by Graco: the Nuzzle Nest; Pack 'n Play® with  
25 Cuddle Cove Elite Rocking Seat; Day2Night Sleep System; Pack 'n Play®  
26 Playard Smart Stations; Pack 'n Play® Playard; Silhouette™ Pack 'n Play®  
27 Playard; Pack 'n Play® Playard with Twins Bassinet; Suite Solutions Portable  
28 Playard; Travel Lite™ Crib; and Bedroom Bassinet. In addition, the Aprica

1 Haven, Nuna Sena Travel Cot, and Nuna Sena Mini Travel Cot are also sold by  
2 Wonderland and covered by the '919 patent.

3 20. Baby Trend has infringed and continues to infringe, has induced and  
4 continues to induce others to infringe, and has committed and continues to  
5 commit acts of contributory infringement of one or more claims of the '919 Patent  
6 in this judicial district and elsewhere by making, using, selling, offering for sale,  
7 and importing into the United States play yards, including at least the Deluxe  
8 Playard, that are covered by one or more claims of the '919 Patent, all in  
9 violation of 35 U.S.C. § 271 and to the injury of Wonderland.

10 21. As a result of Baby Trend's infringement of the '919 Patent,  
11 Wonderland has suffered damages in an amount to be determined and will  
12 continue to suffer damages in the future.

13 22. Upon information and belief, Baby Trend's infringement of the '919  
14 Patent will continue in the future, and Wonderland will continue to suffer  
15 damages as a consequence, unless Baby Trend's infringing acts are enjoined by  
16 this Court.

17 **COUNT TWO: INDUCEMENT OF INFRINGEMENT OF U.S.**  
18 **PATENT NO. RE43,919**

19 23. The allegations of paragraphs 1-22 are incorporated for this Count  
20 Two as though fully set forth herein.

21 24. Defendants Denny Tsai and Betty Tsai have had knowledge of the  
22 '919 Patent since at least on or about the meeting in Los Angeles, California on  
23 April 24, 2014.

24 25. Defendants Denny Tsai and Betty Tsai have authority and control over  
25 the operations of Baby Trend.

26 26. On information and belief, Baby Trend continues to sell, offer to sell,  
27 and import the Deluxe Playard.

28 27. On information and belief, Defendants Denny Tsai and Betty Tsai

1 know that the Deluxe Playard infringes the '919 Patent, actively encourage and  
2 control Baby Trend's continued sale of the Deluxe Playard, and know and  
3 intend that their actions cause Baby Trend's infringement of the '919 Patent,  
4 all in violation of 35 U.S.C. § 271 causing injury to Wonderland.

5 28. Upon information and belief, Denny Tsai's and Betty Tsai's  
6 inducement of infringement of the '919 Patent will continue in the future, and  
7 Wonderland will continue to suffer damages as a consequence, Denny Tsai's and  
8 Betty Tsai's infringing acts are enjoined by this Court.

9 **PRAYER FOR RELIEF**

10 WHEREFORE, Wonderland prays for relief as follows:

11 A. Judgment that Baby Trend has infringed, induced others to infringe,  
12 and committed acts of contributory infringement with respect to one or more  
13 claims of the '919 Patent in violation of 35 U.S.C. § 271;

14 B. Judgment that Baby Trend's infringement of the '919 Patent is  
15 willful and deliberate;

16 C. Judgment that Denny Tsai and Betty Tsai induce Baby Trend's  
17 infringement of the '919 Patent.

18 D. Judgment that Denny Tsai's and Betty Tsai's infringement of the  
19 '919 Patent is willful and deliberate.

20 E. An order permanently enjoining Baby Trend, Denny Tsai, Betty  
21 Tsai, Baby Trend's subsidiaries, officers, agents, servants, employees,  
22 licensees, and all other persons acting or attempting to act in active concert or  
23 participation with Baby Trend or acting on Baby Trend's behalf, from further  
24 infringement, inducement of infringement, or contributory infringement of the  
25 '919 Patent, pursuant to 35 U.S.C. § 283;

26 F. An order directing Baby Trend, Denny Tsai, and Betty Tsai to  
27 account for and pay to Wonderland all damages caused by Baby Trend's  
28 infringement, including increased damages, under 35 U.S.C. § 284;

1 G. An order directing Baby Trend, Denny Tsai, and Betty Tsai to pay  
2 Wonderland's costs, expenses, and reasonable attorney fees pursuant to 35  
3 U.S.C. §§ 284 and 285;

4 H. An award to Wonderland of pre-judgment and post-judgment  
5 interest on the damages caused by Baby Trend's, Denny Tsai's, and Betty Tsai's  
6 infringement; and

7 I. Such other and further relief as the Court may deem just and  
8 proper.

9 **DEMAND FOR JURY TRIAL**

10 Wonderland requests a trial by jury.

11  
12 Dated: June 6, 2014

JONES DAY

13  
14 By:   
15 Douglas L. Clark

16 Attorneys for Plaintiff Wonderland  
17 Nurserygoods Co., Ltd.

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