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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

OPP BRAND SOLUTIONS LLC,
a California limited liability
company,

Plaintiff,

v.

UNCAGED, LLC, a Nebraska
limited liability company,

Defendant.

Case No. 2:19-cv-9014

**COMPLAINT FOR DECLARATORY
JUDGMENT, UNFAIR COMPETITION,
TORTIOUS INTERFERENCE, TRADE
LIBEL AND OTHER RELIEF**

DEMAND FOR JURY TRIAL

Plaintiff OPP BRAND SOLUTIONS LLC (hereinafter "Plaintiff"), by and
through its counsel, alleges as its complaint against Defendant UNCAGED LLC
("Defendant") as follows:

FACTUAL BACKGROUND

8. Plaintiff OPP is in the business of, *inter alia*, selling a variety of clothing and personal accessory products online including, among many other items, scarves.

9. Defendant Uncaged is also in the business of selling personal accessory products including a certain scarf product that it contends is the subject of the '682 Patent.

10. Both Plaintiff and Defendant sell their personal accessory products on the retail website Amazon.com operated by Amazon.com, Inc. ("Amazon").

11. True and correct copies of exemplary product listings of Plaintiff's and Defendant's products on Amazon are attached hereto as Exhibit B.

12. OPP's scarf products do not comprise (at a minimum):

- an elongated composite fabric sash having an inner annuler {sic} sheet and an outer loosely billowed annular sheet attached together to form a continuous generally oval ring shaped body;
- a selectively closable pocket separate from and attached to the inner and outer sheets and sandwiched between the inner and outer sheets, wherein the pocket is accessible along one edge joining the inner and outer sheets, and wherein the sash may be folded into the pocket to convert the sash into the clutch purse, wherein the loosely billowed outer sheet of the sash loosely drapes on a wearer and substantially hides content of the pocket when worn as a sash; or,
- a drawstring around the ring shaped body to adjust an amount of billow of the loosely billowed sheet.

Attached hereto as Exhibit C are images of OPP's scarf design.

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1 13. On September 16, 2019, OPP received an email notice from Amazon
2 indicating Uncaged alleged a claim of patent infringement for the '682 Patent
3 against OPP's products. A true and correct copy of Amazon's email notice is
4 attached hereto as Exhibit D.

5 14. Even a cursory examination of OPP's product reveals that OPP's
6 accused scarf products do not and cannot infringe the '682 Patent. At the very
7 minimum, OPP's product clearly does not have a drawstring or an inner annular
8 sheet.

9 15. As a result of Defendant Uncaged's baseless complaint to Amazon,
10 twenty-nine (29) of OPP's sales listings were contemporaneously disabled,
11 preventing OPP from making sales of the accused product on Amazon.

12 16. On information and belief, Defendant Uncaged has intentionally
13 misrepresented to Amazon the extent of its purported patent rights, including and
14 without limitation, falsely stating that Plaintiff's product falls within the scope of
15 the claims of the '682 Patent. Moreover, Plaintiff's product is so far outside the
16 scope of the claims of the '682 Patent that it is clear Defendant acted with
17 intentional and/or reckless disregard to claim even a colorable claim of patent
18 infringement.

19 17. Defendant's defamatory misrepresentation to Amazon alleging patent
20 infringement on or about September 16, 2019 had no reasonable basis and was
21 intended to disrupt and interfere with Plaintiff's sales of a competing product.

22 18. Due to Amazon's partially automated system of regularly disabling
23 sales listings, Defendant's wrongful, false, and misleading complaint caused
24 interruption and interference with Plaintiff's listings and sale of products. As a
25 result, Defendant has prevented Plaintiff OPP's prospective sales during the period
26 of being delisted by Amazon's system.

27 19. On September 20, 2019, Plaintiff sent a letter, through its counsel,
28 informing Defendant that its Amazon complaint had no factual or legal basis.

1 20. Despite continuous and subsequent correspondence between
2 Plaintiff's and Defendant's counsel, Uncaged has refuse to withdraw its complaint
3 with Amazon. Plaintiff's sales listings remain disabled and Plaintiff continues to
4 lose sales.

5
6 **CLAIMS FOR RELIEF**

7 **First Claim for Relief**

8 **(Declaratory Judgment of Non-Infringement of the '682 Patent)**

9 21. Plaintiff repeats and incorporates by reference the statements and
10 allegations in paragraphs 1 to 20 of the complaint as though fully set forth herein.

11 22. There exists an actual, substantial, and immediate controversy
12 between OPP and Uncaged concerning OPP's alleged liability for infringement of
13 the claims of the '682 Patent.

14 23. The controversy was, at least in part, created by Uncaged's
15 correspondence to Amazon alleging patent infringement by OPP.

16 24. OPP unequivocally asserts that it does not infringe any of the claims
17 of the '682 Patent. Prior to Defendant's correspondence, Plaintiff had no
18 constructive or actual notice of the '682 Patent.

19 25. Plaintiff is entitled to a judgment declaring that it does not infringe,
20 and has not infringed, the claims of the '682 Patent by making, using, selling or
21 offering to sell Plaintiff's products, either literally or under the doctrine of
22 equivalents.

23 26. Plaintiff seeks a declaratory judgment to resolve Plaintiff's and
24 Defendant's respective rights regarding Defendant's claim of patent infringement.

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Second Claim for Relief

(Interference with Prospective Contractual or Economic Relations)

27. Plaintiff repeats and incorporates by reference the statements and allegations in paragraphs 1 to 26 of the complaint as though fully set forth herein.

28. Plaintiff has enjoyed an economic relationship with Amazon, third-party retailers and its customers that was an economic benefit to Plaintiff.

29. Plaintiff also has prospective economic relations with certain customers and prospective customers which would be of economic benefit to Plaintiff.

30. Defendant knew of the existence of Plaintiff's economic relationship or prospective economic relations with Amazon, third-party retailers, customers and prospective customers.

31. Defendant intentionally or negligently interfered with these economic relationships causing a breach of the relationships with no privilege to do so.

32. Also, Defendant intentionally and improperly interfered with Plaintiff's prospective contractual or economic relations by inducing or causing the customer and/or prospective customer not to enter into or continue its prospective relationship with Plaintiff or has prevented Plaintiff from acquiring or continuing its prospective relations.

33. Defendant's actions have been without justification or privilege.

34. Defendant's acts, as set forth above, constitute tortious interference, all to the damage of Plaintiff as previously alleged.

Third Claim for Relief

(Trade Libel)

35. Plaintiff repeats and incorporates by reference the statements and allegations in paragraphs 1 to 34 of the complaint as though fully set forth herein.

1 36. On information and belief, Defendant misrepresented to Amazon that
2 Plaintiff infringed Defendant's patent rights, despite having no reasonable basis for
3 believing Plaintiff's product was within the scope of the claims of the '682 Patent.

4 37. Defendant's complaint alleging patent infringement by Plaintiff would
5 be clearly or necessarily understood to have disparaged the quality of Plaintiff's
6 product. This statement was made to Amazon. The statement was false.

7 Defendant knew that the statement was false or acted with reckless disregard of the
8 truth or falsity of the statement. Defendant knew or should have recognized
9 Amazon might and did act in reliance on the statement, causing Plaintiff financial
10 loss.

11 38. Plaintiff suffered direct financial harm because Amazon acted in
12 reliance on the statement and Defendant's conduct was a substantial factor in
13 causing Plaintiff's harm.

14 39. Defendant's acts, as set forth above, constitute trade libel, all to the
15 damage of Plaintiff as previously alleged.

16 40. Defendant's conduct amounted to malice, oppression or fraud.

17
18 **Fourth Claim for Relief**

19 **(Unfair Competition under 15 U.S.C. § 1125)**

20 41. Plaintiff repeats and incorporates by reference the statements and
21 allegations in paragraphs 1 to 40 of the complaint as though fully set forth herein.

22 42. By reason of the foregoing unlawful acts recited in the paragraphs
23 above, Plaintiff has been irreparably harmed and will continue to suffer damage
24 until an appropriate injunction and damages award, including increased treble
25 damages and attorneys' fees, are imposed by this court against Defendant.

26 43. Defendant's acts, as set forth above constitute unfair competition as
27 defined in 15 U.S.C. § 1125, all to the damage of Plaintiff as previously alleged.

Fifth Claim for Relief

(State Law Unfair Competition – Cal. Bus. & Prof. Code § 17200)

44. Plaintiff repeats and incorporates by reference the statements and allegations in paragraphs 1 to 43 of the complaint as though fully set forth herein.

45. Defendant's acts, as set forth above constitute unfair competition as defined in California Business and Professions Code § 17200, *et seq.*, all to the damage of Plaintiff as previously alleged.

Sixth Claim for Relief

(Common Law Unfair Competition)

46. Plaintiff repeats and incorporates by reference the statements and allegations in paragraphs 1 to 45 of the complaint as though fully set forth herein.

47. Defendant's acts, as set forth above, constitute unfair competition as defined under California common law, all to the damage of Plaintiff as previously alleged.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff asks that this Court grant judgment against Defendant for the following:

A. Defendant, its officers, agents, servants, employees, and attorneys, and all persons in active concert or participation with any of them, be permanently enjoined from:

- i. interfering with Plaintiff's economic and prospective relationship with Amazon or other third-party vendors and Plaintiff's customers, including sending false or misleading complaints of patent infringement to Amazon or Plaintiff's customers;
- ii. unfairly competing with Plaintiff;
- iii. conspiring, encouraging, inducing, allowing, abetting, or assisting

1 others in performing any of the activities referred to in
2 subparagraphs (i) - (ii) above.

3 B. Defendant shall file with the Court and serve on Plaintiff, within 30
4 days after the entry and service on Defendant of an injunction, a report in writing
5 and attested to under penalty of perjury setting forth in detail the manner and form
6 in which Defendant has complied with the provisions of subparagraph (A) above.

7 C. Declaring Plaintiff has not and does not infringe the claims of U.S.
8 Patent No. 8,944,682.

9 D. Plaintiff recovers all damages it has sustained as a result of
10 Defendant's tortious interference, trade libel and unfair competition.

11 E. Plaintiff be awarded exemplary damages, pursuant to any applicable
12 law.

13 F. Plaintiff be awarded punitive damages, pursuant to any applicable
14 law.

15 G. Plaintiff be awarded its reasonable attorneys' fees for prosecuting this
16 action, pursuant to any applicable law.

17 H. Plaintiff recover its costs of this action and pre-judgment and post-
18 judgment interest to the full extent allowed by law.

19 I. Plaintiff receive all other relief the Court deems appropriate.
20

21 Respectfully submitted,

22 **MANDOUR & ASSOCIATES, APC**

23 Dated: October 18, 2019

24 /s/ Ben T. Lila

25 Ben T. Lila (SBN 246808)

26 Email: blila@mandourlaw.com

27 Attorneys for Plaintiff,

28 **OPP BRAND SOLUTIONS LLC**

JURY DEMAND

Plaintiff demands a trial by jury of all issues so triable.

MANDOUR & ASSOCIATES, APC

Dated: October 18, 2019

/s/ Ben T. Lila

Ben T. Lila (SBN 246808)

Email: blila@mandourlaw.com

Attorneys for Plaintiff,

OPP BRAND SOLUTIONS LLC

EXHIBIT A

EXHIBIT A



US008944682B2

(12) **United States Patent**
Lee

(10) **Patent No.:** **US 8,944,682 B2**
(45) **Date of Patent:** **Feb. 3, 2015**

(54) **CONVERTIBLE CLUTCH PURSE**

(75) Inventor: **Angela A. Lee**, Omaha, NE (US)

(73) Assignee: **Uncaged, LLC**, Omaha, NE (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 406 days.

(21) Appl. No.: **13/368,523**

(22) Filed: **Feb. 8, 2012**

(65) **Prior Publication Data**

US 2013/0056118 A1 Mar. 7, 2013

Related U.S. Application Data

(60) Provisional application No. 61/573,315, filed on Sep. 2, 2011, provisional application No. 61/567,473, filed on Dec. 6, 2011.

(51) **Int. Cl.**

A45C 9/00 (2006.01)

A45C 3/06 (2006.01)

A45F 4/00 (2006.01)

A45F 3/02 (2006.01)

(52) **U.S. Cl.**

CPC ... *A45C 3/06* (2013.01); *A45F 4/00* (2013.01);
A45C 9/00 (2013.01); *A45F 3/02* (2013.01);
A45C 2009/007 (2013.01)

USPC **383/4**; 224/158; 383/71; 2/91

(58) **Field of Classification Search**

USPC 224/586, 158, 159; 383/4, 71; 2/91
See application file for complete search history.

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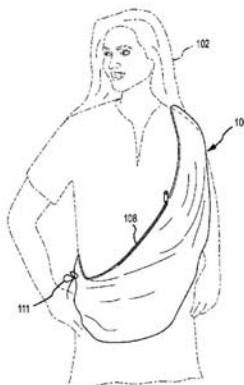
Primary Examiner — Tri Mai

(74) Attorney, Agent, or Firm — Greenberg Traurig, LLP

(57) **ABSTRACT**

A convertible clutch purse is disclosed that converts to a billowy sash and vice versa. The purse is formed of an elongated composite fabric structure having an inner sheet and an outer billowed sheet attached together to form, in one embodiment, a generally oval shaped body. A selectively closable pocket is sandwiched between the inner and outer sheets, wherein the pocket is accessible along one edge joining the inner and outer sheets, and wherein the sash may be folded into the pocket to convert the sash into the clutch purse. An alternative embodiment converts from the purse to a stole or scarf having free ends.

4 Claims, 6 Drawing Sheets



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U.S. Patent

Feb. 3, 2015

Sheet 1 of 6

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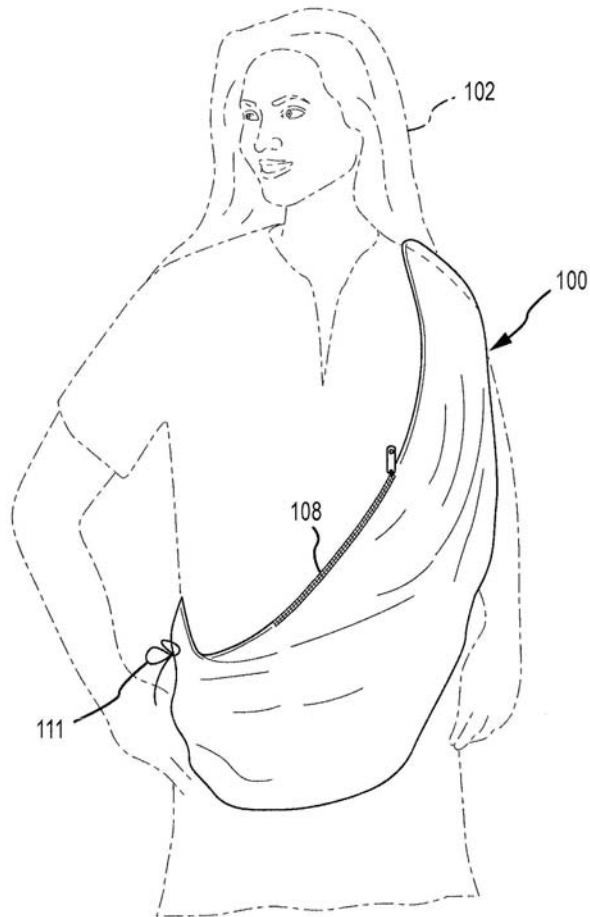


FIG.1

U.S. Patent

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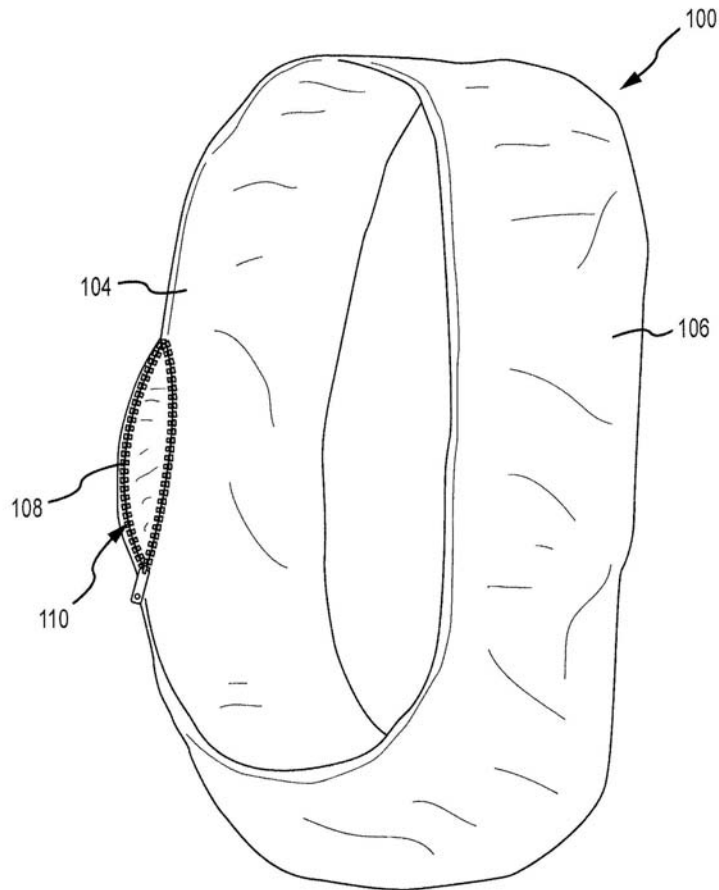


FIG.2

U.S. Patent

Feb. 3, 2015

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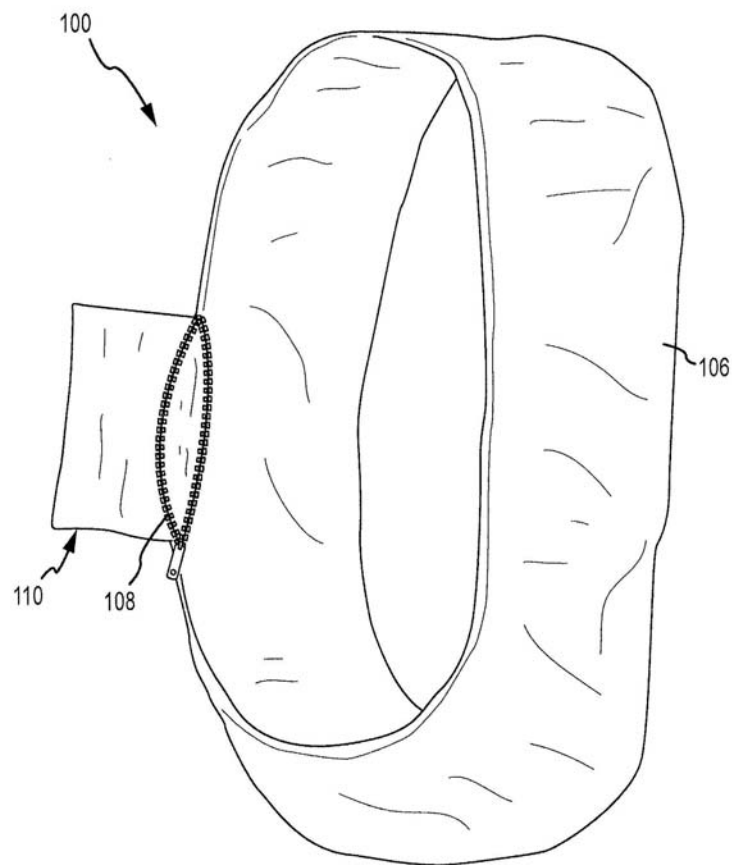


FIG.3

U.S. Patent

Feb. 3, 2015

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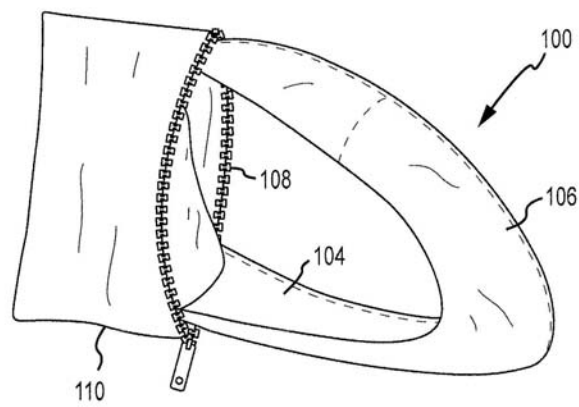


FIG.4

U.S. Patent

Feb. 3, 2015

Sheet 5 of 6

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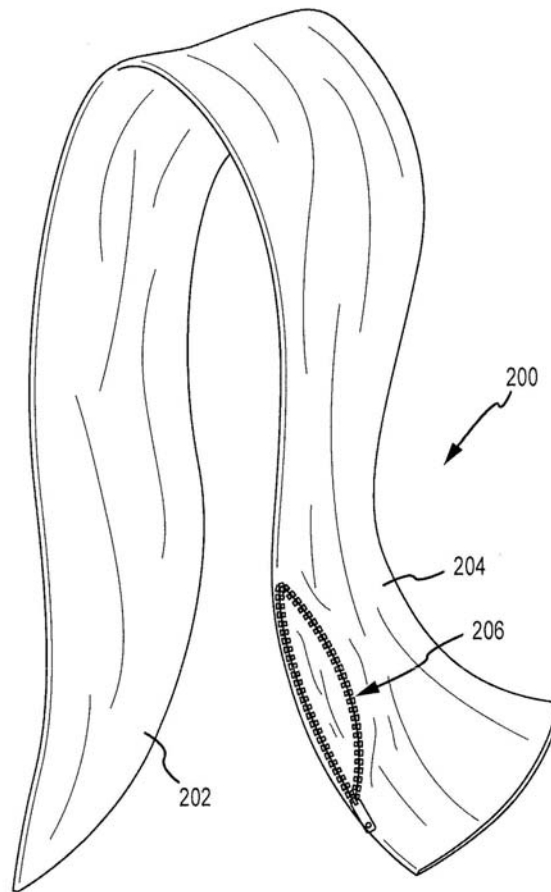


FIG.5

U.S. Patent

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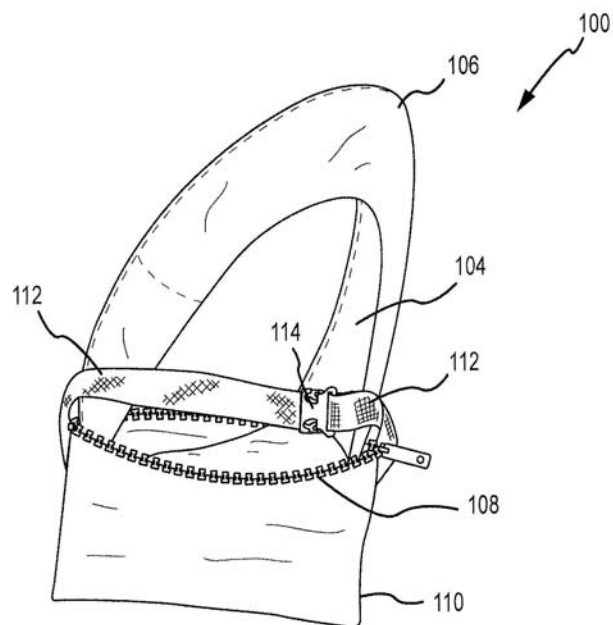


FIG. 6

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CONVERTIBLE CLUTCH PURSE**CROSS REFERENCE TO RELATED APPLICATIONS**

This application claims the benefit of priority of U.S. Provisional Patent Application Ser. No. 61/573,315, filed Sep. 2, 2011, entitled Pocket(s) Bandolier Convertible into Clutch-Purse and/or Belt-Carrier, and Provisional Patent Application Ser. No. 61/567,473, filed Dec. 6, 2011, entitled Convertible Scarf, the content of which are hereby incorporated by reference in their entirety.

BACKGROUND OF THE DISCLOSURE

U.S. Pat. Nos. 4,634,031 and D505787 disclose typical over-the-shoulder pocket bandoliers. People, particularly women, often select their purses and/or scarves in a manner to complement their clothing. However, over the shoulder pocket bandoliers such as shown in these patents, are not constructed or designed as a garment to complement a wearer's outfit or make a complementary fashion statement. A sash, on the other hand, is often used to complement a wearer's outfit. Most women, for example if using such a garment as a bandolier or sash, would still opt, in addition, for carrying a clutch purse or a strapped purse over one shoulder in a normal manner. In such a case, one often will lay her purse down when handling merchandise, for example, which can lead to inadvertent misplacement or theft of one's purse. Therefore there is a need for a product that can carry normal purse items so as to circumvent such problems, and still look like part of the persons collective outfit.

SUMMARY OF THE DISCLOSURE

The present disclosure directly addresses this problem. A convertible sash in accordance with a first embodiment of the present disclosure provides a decorative billowing bandolier or sash that looks like a decorative billowing wrap, shawl or sash, but has, within its folds, a closable pocket into which personal items such as lipstick, wallet, comb can be stored while still retaining its draped, billowy shape when worn. In addition, when the pocket is turned inside out, the billowy sash can be stuffed into this pocket to convert it into a clutch purse. The pocket is of sufficient size to carry the typical content of a clutch purse in addition to the sash.

Another embodiment may further include a set of tails attached to the side edges of the clutch purse that can be either tied or snap fastened together to make the clutch purse into a waist pack.

A still further embodiment is a scarf or stole, that includes a pocket into which, when turned inside out, the scarf or stole can be stuffed to convert the scarf into a clutch purse.

Further features, advantages and characteristics of the embodiments of this disclosure will be apparent from reading the following detailed description when taken in conjunction with the drawing figures.

DESCRIPTION OF THE DRAWINGS

FIG. 1 is a perspective view of a person wearing a billowing sash in accordance with an exemplary embodiment of the present disclosure.

FIG. 2 is separate perspective view of the billowing sash shown in FIG. 1.

FIG. 3 is a separate perspective view of the billowing sash shown in FIG. 2 with the pocket turned inside out.

2

FIG. 4 is a separate perspective view of the sash partially folded into the pocket to form the clutch purse.

FIG. 5 is a perspective view of a convertible scarf in accordance with another embodiment of the present disclosure.

FIG. 6 is a perspective view of either the billowy sash or convertible scarf partially folded into the clutch purse with tails to form a waist pack in accordance with the present disclosure.

DETAILED DESCRIPTION

An exemplary embodiment of a convertible sash/clutch purse 100 is shown in FIG. 1 worn by a woman 102. The convertible sash/clutch purse 100 is separately shown in FIGS. 2-4. The sash 100 is an elongated body having a continuous general oval shape, formed from two sheets preferably sewn together. The sash 100 has a fabric inner sheet 104 that forms a generally body hugging sash. This inner sheet 104 is sewn or otherwise fastened along its outer edges to a loosely billowed outer fabric sheet 106. Along a portion of an upper edge of the inner sheet 104 one side of a zipper 108 is sewn. The zipper 108 is also sewn to one edge of a generally rectangular pocket 110. The other side of the zipper 108 is sewn to an upper edge of the billowy outer fabric sheet 106 so as to sandwich the pocket 110 between the inner sheet 104 and the outer sheet 106.

The inner sheet 104 may be formed of any fabric material. A smooth fabric such as satin or silk may be preferred so as to ride comfortably against the wearer's clothing. The outer sheet 106 may be any one of a number of decorative fabrics that is chosen to complement a portion of the person's clothing such as blouse, skirt or pants, and may be fine woven or coarse, and may be patterned or plain. The outer sheet 106 is preferably larger than the inner sheet 104 such that when sewn together, the outer sheet 106 billows and drapes loosely on the wearer 102 about the inner sheet 104 forming the sash 100. Such a construction also hides the pocket 110 when worn, as the pocket 110 typically may contain numerous items that the wearer normally would carry in a separate purse.

Because of the billowy nature of the outer sheet 106, a drawstring 111 may also be provided around the perimeter so that the wearer can adjust the amount of billow that the sash 100 presents when worn. A second or third smaller pocket (not shown) could also be provided in the sash 100 for storage of particularly vital small items such as extra cash or keys.

The sash 100 is preferably worn as shown in FIG. 1. The wearer 102 can also take off the sash 100 and open the zipper 108, pull inside-out the pocket 110, as shown in FIG. 3, and then stuff the sash 100 into the pocket 110 as is shown in FIG. 4. The pocket 110 then becomes the clutch purse. Alternatively, the pocket 110 may have tails or belt straps 112 sewn or removably attached to its lateral outer edges, as shown in FIG. 6. These belt straps 112 preferably terminate in male/female mating buckles 114 such that the clutch purse (converted sash 100) alternatively can be worn as a waist pack. These straps 112 may, for example, be fastened to the pocket 110 via snap fasteners, or sewn to the pocket 110.

An alternative convertible scarf or stole 200 is shown in FIG. 5. Here the convertible scarf or stole 200 is formed in the same manner as the sash 100 except that the ends of the fabric sheets are not joined a continuous loop or sash. The scarf or stole 200 is formed of an inner sheet 202 sewn to an outer sheet 204 with a zippered pocket 206 that can be utilized identically to that shown and described with reference to the convertible sash 100 above.

There are many alternatives and modifications that will be apparent to those skilled in the art. For example, the scarf or

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stole **200** may be configured by another zipper along its bottom ends such that the ends may be joined together to form a virtual equivalent to the sash **100** described above. The sash **100** may be configured with zippered pockets **110** on both sides of the sash **100** in a mirror configuration. The sash **100** may also include a short sleeve portion for the upper arm of the wearer such that it will not slip down off the wearer's shoulder when worn during exercise. All such changes, alternatives and equivalents in accordance with the features and benefits described herein, are within the scope of the present disclosure. Such changes and alternatives may be introduced without departing from the spirit and broad scope of my invention as defined by the claims below and their equivalents.

What is claimed is:

1. A convertible sash/clutch purse comprising:

an elongated composite fabric structure having an inner sheet and an outer loosely billowed annular sheet attached together to form a continuous generally oval ring shaped body;

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a selectively closable pocket separate from and attached to the inner and outer sheets and sandwiched between the inner and outer sheets, wherein the pocket is accessible along one edge joining the inner and outer sheets, and wherein the sash may be folded into the pocket to convert the sash into the clutch purse, wherein the loosely billowed outer sheet of the sash loosely drapes on a wearer and substantially hides content of the pocket when worn as a sash; and

a drawstring around the ring shaped body to adjust an amount of billow of the loosely billowed sheet.

2. The purse according to claim 1 wherein the closable pocket includes a zipper closure along a seam between the inner and outer sheets.

3. The purse according to claim 2 further comprising a strap extending from each opposite side of the pocket configured to convert the purse to a waist pack.

4. The purse according to claim 1 wherein the elongated body forms a continuous sash for a person to wear between hip and opposite shoulder.

* * * * *

UNITED STATES PATENT AND TRADEMARK OFFICE
CERTIFICATE OF CORRECTION

PATENT NO. : 8,944,682 B2
APPLICATION NO. : 13/368523
DATED : February 3, 2015
INVENTOR(S) : Lee

Page 1 of 1

It is certified that error appears in the above-identified patent and that said Letters Patent is hereby corrected as shown below:

In the Claims

In Column 3, Line 18, in Claim 1, delete "fabric structure having an inner" and insert -- fabric sash having an inner annuler --, therefor.

In Column 4, Line 6, in Claim 1, delete "into the" and insert -- into a --, therefor.

Signed and Sealed this
Eighth Day of September, 2015



Michelle K. Lee
Director of the United States Patent and Trademark Office

EXHIBIT B

EXHIBIT B

Amazon Fashion

WOMEN MEN GIRLS BOYS BABY LUGGAGE SALES & DEALS NEW ARRIVALS

The Halloween Store Shop candy, costumes, and more

Pop Fashion
Pop Fashion Womens Geometric Pattern Infinity Scarf Wrap Scarf with White Zipper Pocket, Infinity Scarves

Price: \$12.99 & FREE Shipping on orders over \$25.00 shipped by Amazon. Details

Get \$10 off instantly. Pay \$2.99 upon approval for the Amazon Prime Store Card.

Color: Gray

100% Polyester

• **INFINITY SCARF** - This is the best womens scarf for any season! Wear this when infinity scarf with your favorite tank and sweater to the beach, or with a dress on a date to the fun! These scarves are so easy to wear, complements any outfit and will help shield you from the sun on those warm days or be the extra added layer for your chilly winter cooler! The best part is this fashion scarf comes in a large variety of colors with a cute pattern and will help you look your best this summer or fall!

• **WOMENS CLOTHING** - This womens scarf is the best clothing accessory for any woman on the go! Such a great womens clothing accessory and will complement any outfit, during any season! Womens and girls clothes are so abundant and hard to choose for, so why not have this scarf that will complement any outfit and can be the perfect addition to any womens apparel. Why not add a colorful scarf to any womens, teens or girls clothes? This scarf comes in so many colors it will make any woman or girl happy!

• **WOMENS ACCESSORIES** - Every woman loves her accessories, and always love adding new ones to their collection! This scarf is the perfect accessory for any woman who has a active lifestyle, this scarf will be an effortless addition to any outfit. Wear this scarf with your favorite earrings or bracelet and you will be instantly complete your outfit with the best accessories possible. So don't touch with your girls, or not in a date with a cute new guy and you will instantly look pulled together!

• **NEW FREE MONEY BACK GUARANTEE** - Not completely satisfied with our Product? Just contact us for a full return and refund!

New (1) from \$12.99 & FREE shipping on orders over \$25.00. Details

Report incorrect product information.

2019 Women's polarized sunglasses

AT&T Inteligo Fashion Round Aviator Style Polarized Sunglasses for Women 11189

\$14.99 & prime

Recommended from our brands

LACE COMO SCARVES \$20.99

LACE COMO SCARVES \$20.99

LACE COMO SCARVES \$20.99

LACE COMO SCARVES \$20.99

Amazon Fashion

WOMEN MEN GIRLS BOYS BABY LUGGAGE SALES & DEALS NEW ARRIVALS

PHIPack Your meds, delivered! Sign up today for a FREE dispenser

SHOLDIT
SHOLDIT - The Original Convertible Infinity Scarf with Pocket - Multiple Colors Available, New MYSTIC Collection

Price: \$39.99 & FREE Shipping. Details

Get \$10 off instantly. Pay \$29.99 upon approval for the Amazon Prime Store Card.

Color: Vibe Blue

100% Polyester

• The original Multi-use Infinity Scarf with pocket as seen on Good Morning America, The View, Forbes, The TODAY Show, The Travel Channel, and more.

• Lightweight, subtle texture with color coordinated reversible zipper

• Wear it four ways: as a neck wrap, as a shawl, cross body sling, or use the reversible zipper to fold into a fashionable clutch purse and attach a wristlet to the fabric loop. *wristlet not included

• Infinity scarf is made out of 100% polyester and measures 34" L x 10" W

• Machine wash cold, lay flat to dry. Happiness Guaranteed.

New (1) from \$39.99 & FREE shipping. Details

Report incorrect product information.

2019 Women's polarized sunglasses

AT&T Inteligo Fashion Round Aviator Style Polarized Sunglasses for Women 11189

\$14.99 & prime

Customers who viewed this item also bought

SHOLDIT \$11.99 - \$12.99

Pop Fashion \$14.99

Pop Fashion \$12.99 - \$14.99

AT&T \$9.99 - \$14.99

EXHIBIT C

EXHIBIT C



EXHIBIT D

EXHIBIT D

From: Amazon <notice-dispute@amazon.com>
Sent: Monday, September 16, 2019 11:51 AM
To: amazon@popfashion.co
Subject: Notice: Policy Warning



Hello,

We removed some of your listings because we received a report from a rights owner that they infringe the following patent(s):

-- Patent number 8,944,682

The listings we removed are at the bottom of this message.

Why did this happen?

One or more of your listings may be infringing the intellectual property rights of others.

We're here to help.

If you need help better understanding what is causing this, please search for "Intellectual Property Violations" in Seller Central Help (<https://sellercentral.amazon.com/gp/help/external/201361070>).

How do I reactivate my listing?

To reactivate your listing you may provide one of the following:

1) A letter of authorization or a licensing agreement from the manufacturer or Rights Owner demonstrating that your product sales are lawful to notice-dispute@amazon.com. External links are not accepted. For security reasons, we only accept attachments in the following file formats: .jpeg, .jpg, .png, .gif, .tiff.

Have your listings been removed in error?

If you believe there has been an error, please tell us why. Your explanation should include the following information:

-- Proof that you have never sold the reported product. We will investigate to determine if an error occurred.

OR

-- Explanation of why you were warned in error. We will investigate to determine if an error occurred.

What happens if I do not provide the requested information?

If we do not receive the requested information, your listings will remain inactive.

If you do not provide the information within 90 days, you will receive a request to remove the inventory associated with these listing per our removal policy

(<https://sellercentral.amazon.com/gp/help/202000820>). Failure to address this request can lead to destruction of your inventory.

ASIN: B01LWVKW94, B01N0P14XY, B01K8Y375C, B01LXG23G4, B01LZ5KRL2, B01NCHA1DH, B01LWVL02K, B01MQU93SY, B01LWJU0Y8, B01NCKCYJK, B01MQU974U, B01N9FTJLX, B01M0PI989, B01N7GFOUA, B01MQU94ID, B01MXWFA27, B01MF8YMV9, B01LZH891A, B01N07GW0Y, B01N4C65RE, B072BBK7SK, B01M1ON0YX, B01LWJW3UT, B01LZH8O9T, B01LXG2B3F, B01N2S4SC2, B01N2S4CCD, B01LY6GQLK, B01LXG27S4

Patent Number: 8,944,682

Complaint ID: 6445073101

-- angela@sholdit.com

You can view your account performance

(https://sellercentral.amazon.com/performance/dashboard?reftag=email_wam) or select Account Health on the home screen of the Amazon Seller app on your iOS or Android device. The Account Health dashboard shows how well your account is performing against the performance metrics and policies required to sell on Amazon.

-- iOS: <https://itunes.apple.com/us/app/amazon-Seller/id794141485>

-- Android: <https://play.google.com/store/apps/details?id=com.amazon.sellermobile.android&hl...>

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Seller Performance Team

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