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NINGBO DONGCHUAN SWIMMING POOL EQUIPMENT CO., LTD.

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA

NINGBO DONGCHUAN SWIMMING  
POOL EQUIPMENT CO., LTD., a  
corporation of China

Plaintiff,

v.

ONDWAY, POOLCLEAN US STORE, USA  
WAREHOUSE, BOWANJIE, INPOOL US  
STORE, DEWFOND, DIGIGER,  
MOTOBUDDY STORE, et al.

Defendant.

Case No.

**(1) COMPLAINT FOR  
PATENT INFRINGEMENT  
[35 U.S.C. § 271 *et seq.*]**

**(2) DEMAND FOR JURY TRIAL**

For its Complaint against Defendants ONDWAY, POOLCLEAN US STORE, USA WAREHOUSE,  
BOWANJIE, INPOOL US STORE, DEWFOND, DIGIGER, MOTOBUDDY STORE (collectively  
“Defendants”), Plaintiff NINGBO DONGCHUAN SWIMMING POOL EQUIPMENT CO., LTD.  
 (“Plaintiff”) states the following:

**I.**

**THE PARTIES**

1. Plaintiff is a corporation organized and registered in China having a principal place of business at Shanglin Village Dongqiaotown Industry Zone, Ningbo, Zhejiang, 315156, China.

2. Plaintiff is informed and believes, and thereupon alleges, that Defendants are foreign based companies that has copied Plaintiff's proprietary patent-protected and sells those products online in marketplaces such as Amazon.com and eBay.com without regard for the intellectual property rights of others, and who may be characterized as infringers and counterfeiters because of their disregard for the owner's rights and/or for the damage they cause to legitimate business. Sometimes the one Defendants conduct their legitimate business in concert or connection with other Defendants.

3. Upon information and belief, Defendant has substantial contacts and transacts substantial business, either directly or through agents, on an ongoing basis in this judicial district and elsewhere in the United States.

4. All allegations in this complaint referencing Defendants shall be deemed to mean acts of Defendants acting individually, jointly, severally, or any combination of them.

5. Unless specifically stated otherwise, the acts complained of herein were committed by, on behalf of, and/or for the benefit of Defendants.

**II.**

**NATURE OF THE ACTION**

6. This is an action for patent infringement.

7. Plaintiff is informed and believes, and thereupon alleges, that Defendant has been infringing, contributing to the infringement of, and/or actively inducing others to infringe the claims of

1 U.S. Patent No. D985,947S (“the ’947 Patent”).  
2

3  
4 **III.**

5 **JURISDICTION AND VENUE**

6 8. This action arises under the patent laws of the United States, 35 U.S.C. § 271 et seq.,  
7 and the laws of the Commonwealth of Pennsylvania. This Court has subject matter jurisdiction  
8 pursuant to 28 U.S.C. § 1331 (as a federal question), and §1338(a) (patent question) and 28 U.S.C.  
9 §1367.

10 9. This Court has personal jurisdiction over Defendants because they conduct substantial  
11 business in the Commonwealth of Pennsylvania in this judicial district and have been infringing,  
12 contributing to the infringement of, and/or actively inducing others to infringe the ’947 Patent in this  
13 District and elsewhere. This Court may exercise personal jurisdiction over a non-resident of the state  
14 where the court sits as and to the extent authorized by state law. Fed R. Civ. Pro. 4e. Pennsylvania  
15 authorized personal jurisdiction over each Defendant pursuant to 42 Pa. Const. Statutes Section  
16 5322(a) which provides: “A tribunal of this Commonwealth may exercise personal jurisdiction over a  
17 person...who acts...as to a cause of action...(1) Transacting any business in this Commonwealth.” In  
18 the alternative, Fed R. Civ. Pro Rule 4(k) confers personal jurisdiction over the Defendant because, on  
19 information and belief they regularly conduct, transact and/or solicit business in Pennsylvania and in  
20 this judicial district and/or derive substantial revenue from their business transactions in Pennsylvania  
21 and in this judicial district and or otherwise avail themselves of the privileges and protections of the  
22 laws of Pennsylvania such that this Courts assertion of jurisdiction over Defendant does not offend  
23 traditional notions of fair play and due process and/or Defendant infringing actions in Pennsylvania  
24 caused injury to Plaintiff in Pennsylvania and this judicial district such that Defendant should  
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1 reasonably contemplate such actions to have consequences in Pennsylvania and this judicial district,  
2 for example:

- 3 (a) On information and belief, Defendants have directed or targeted infringing activities  
4 toward consumers in the United States, including Pennsylvania through their online  
5 platforms and websites, including Amazon.com and eBay.com under seller IDs held  
6 by or associated with Defendants. These online websites are also may be known  
7 under name such as “User Accounts”. Through these websites/User Accounts,  
8 consumers in the United States, including Pennsylvania, can Defendants offering  
9 infringing products online and through which consumers can place orders for delivery  
10 of infringing products and Defendants can transact the illegal business.  
11  
12 (b) Defendants accept payment for infringing products in U.S. dollars and offer delivery  
13 of the illegal sales in the United States, including Pennsylvania.  
14  
15 (c) Defendants are currently and continuously targeting their illegal sales of infringing  
16 products toward consumers and causing harm in Allegheny County, Pennsylvania.  
17  
18 (d) Defendants are causing an illegal stream of infringing products to enter the United  
19 States, including this judicial district.  
20  
21 (e) Plaintiff is suffering irreparable harm and substantial damages due to Defendants’  
22 wrongful advertising and sale of infringing goods in this judicial district.

23 10. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391 (a) (b) and (c) because

- 24 (a) a substantial part of the events giving rise to Plaintiff’s claims occurred in  
25 the Western District of Pennsylvania and because Defendants are subject  
26 to personal jurisdiction in the Western District of Pennsylvania,  
27 (b) Defendants are known to transact business in this judicial district, and  
28

(c) Defendants not resident in the United States may be sued in this judicial district because personal jurisdiction is proper in this district.

**FACTUAL BACKGROUND**

**(U.S. Design Patent No. D985,947S)**

11. Plaintiff re-alleges and incorporates by reference Paragraphs 1 – 10 of its Complaint.

12. On May 16, 2023, the '947 Patent titled "POOL BRUSH HEAD" was duly and legally issued to Ningbo Dongchuan Swimming Pool Equipment Co., Ltd.. The '947 Patent has remained in force since that time and continues to be in force. A true and correct copy of the '947 Patent is attached as Exhibit "1" and incorporated herein by reference.

13. The '947 Patent is the result of substantial research into a unique design and commitment of innovative efforts and resources by the inventors Huaizhong He and Hu Zhang.

14. At all relevant times, the rights in the '947 Patent have been owned by Applicant and assignee Ningbo Dongchuan Swimming Pool Equipment Co., Ltd., who is also the Plaintiff.

15. The '947 Patent covers an ornamental design for a pool brush. Plaintiff has been commercially and successfully with its distinctive pool brush design providing differentiation to other competitors' pool brush designs.

16. As a result of Plaintiff's substantial advertising and promotional efforts, as well as the high quality of the pool brush products associated with the design of the '947 Patent, such distinctive pool brush design has earned valuable and residual goodwill and reputation for Plaintiff being the sole source for such pool brush goods in the United States.

17. Plaintiff is informed and believes that the Defendants as listed in Schedule A each owns, operates or otherwise controls an online store on Amazon.com ("Amazon"), eBay.com or

1 Walmart.com where it advertises and sells its products using the brand name listed on Schedule A.

2 18. Plaintiff is informed and believes that Defendants may offer and provide products  
3 between each other which products infringe the '947 Patent to the market under various names.

4 19. Defendants sell the products under the ordinary observer test. Under this test, an  
5 accused design infringes upon a patented design if, in the eye of an ordinary observer, giving such  
6 attention as a purchaser usually gives, two designs are substantially the same in that the resemblance is  
7 such as to deceive such an observer, inducing him to purchase one supposing it to be the other.

8 20. A side-by-side comparison of the '947 Patent and the infringing products that are sold  
9 by Defendants are shown below in the Claim Charts accompanying this Complaint as Exhibit "2",  
10 Exhibit "3", Exhibit "4", Exhibit "5", Exhibit "6", Exhibit "7", Exhibit "8", and Exhibit "9"  
11 respectively.  
12

13 21. Plaintiff has not granted a license or any other authorization to Defendants to make  
14 use, offer for sale, sell or import pool brushes that embody the design patented in the '947 Patent and  
15 which are proprietary to Plaintiff.  
16

17 22. On or about August, 2023, Plaintiff through his counsel sent a cease-and-desist letter  
18 to each of the Defendants, informing about the infringement. Despite the cease-and-desist letter,  
19 Defendants continue to sell, offer to sell and/or promote the infringing products on online platforms at  
20 least on Amazon.  
21

22 23. No Defendants have responded to the cease-and-desist letters and/or acknowledged  
23 the receipt of the infringement warning by Plaintiff. None of the other Defendants have ceased selling  
24 the infringing products on-line, or have discouraged consumers from purchasing infringing products,  
25 despite knowing of Plaintiff's rights.

26 24. Defendants have not discouraged consumers from purchasing infringing products,  
27  
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1 despite knowing of Plaintiff's rights.

2 25. Defendants have been willfully and knowingly infringing Plaintiff's rights, including  
3 as to the '947 Patent, causing Plaintiff to suffer from substantial losses and damages.

4 26. Defendants' wrongful conduct and infringing and damaging activities will continue  
5 unless enjoined by this Court.  
6

7  
8 **FIRST CAUSE OF ACTION**

9 **(Infringement of U.S. Design Patent No. D985,947S**

10 **Under 35 U.S.C. § 271 *et seq.*)**

11 27. Plaintiff incorporates by reference and reallege paragraphs 1 through 26 above as  
12 though fully restated here.  
13

14 28. Plaintiff provided actual notice to Defendants of their infringement on repeated  
15 occasions at least as early as August, 2023, including informing Defendant of the infringement and  
16 asking that Defendants cease and desist and also through the filing of this Complaint.

17 29. Defendants have engaged in a pattern of conduct demonstrating: Defendants'  
18 awareness of the '947 Patent; the objectively high likelihood that Defendants' actions constitute  
19 infringement of the '947 Patent and that the '947 Patent is valid and enforceable; and that this  
20 objectively-defined risk was so obvious that Defendants knew or should have known it.  
21

22 30. Plaintiff is informed and believes, and thereupon alleges, that Defendants have  
23 infringed and continue to infringe the '947 Patent by, *inter alia*, making, using, offering to sell, or  
24 selling in the United States, including in the State of Pennsylvania and within this judicial district,  
25 products infringing the ornamental design covered by the '947 Patent in violation of 35 U.S.C. § 271,  
26 including but not limited to the infringing products.  
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32. Defendants' acts of infringement of the '947 Patent were undertaken without authority, permission or license from Plaintiff. Defendant's infringing activities violate 35 U.S.C. § 271.

34. Plaintiff is entitled to a complete accounting of all relevant proceeds profits derived by Defendants from the unlawful conduct alleged herein, including without limitation, Defendants' total profit pursuant to 35 U.S.C. § 289.

36. Plaintiff is entitled to a permanent injunction preventing Defendant from further infringing the '947 Patent.

**WHEREFORE**, Plaintiff asks this Court to enter judgment in its favor against Defendants and grant the following relief:

COMPLAINT  
-8-



1 indirectly through contributory and/or induced infringement, the '947 Patent as alleged above.

2 B. An accounting of all damages sustained by Plaintiff as a result of Defendants' acts of  
3 infringement of the '947 Patent.

4 C. An award to Plaintiff of actual damages adequate to compensate Plaintiff for  
5 Defendants' acts of infringement, together with pre-judgment and post-judgment interest.

6 D. An award to Plaintiff of enhanced damages, up to and including the trebling of Plaintiff's  
7 damages pursuant to 35 U.S.C. § 284 for Defendants' willful infringement of the '947 Patent.

8 E. An award for Plaintiff's cost of suit and reasonable attorneys' fees pursuant to 35 U.S.C.  
9 § 285 due to the exceptional nature of this case; or as otherwise permitted by law.

10 F. A grant of a temporary restraining order, preliminary and permanent injunction pursuant  
11 to 35 U.S.C. § 283, enjoining Defendants and their agents, servants employees, principals, officers,  
12 attorneys, successors, assignees and all those in active concert with Defendants, including related  
13 individuals and entities, customers, representatives, OEM's, dealers and distributors, from further acts  
14 of (1) infringement, (2) contributory infringement, and (3) active inducement to infringe with respect to  
15 the claims of the '947 Patent, and;

16 G. Entry of an Order that, on Plaintiff's request any financial institutions, payment  
17 processors, billing agents, banks, escrow services, money transmitters or marketplace platforms and  
18 their related companies and affiliates, identify and restrain all funds in all financial accounts in  
19 connection with the Defendant and/or their seller ID's or ecommerce names or other identifiers used by  
20 Defendant now or in the future or any other account used in connection with funds processed from the  
21 sale of the infringing products, to be used in partial satisfaction of the judgement entered in this case.

22 H. Any further relief that this Court deems just and proper.

1 Dated: April 15, 2024

RAYCHAN I.P. LAW FIRM, PLLC

2  
3  
4 /s/ Patricia Ray

5 Attorney for Plaintiff  
6 NINGBO DONGCHUAN SWIMMING  
7 POOL EQUIPMENT CO., LTD.  
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**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a jury trial on all issues triable as of right to a jury. FED. R. CIV. P. 38(b).

Dated: April 15, 2024

RAYCHAN I.P. LAW FIRM

/s/ Patricia Ray  
Patricia Ray

Attorney for Plaintiff  
NINGBO DONGCHUAN SWIMMING POOL  
EQUIPMENT CO., LTD.

## SCHEDULE A

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# EXHIBIT 1



US00D985947S

(12) **United States Design Patent** (10) **Patent No.:** **US D985,947 S**  
**He et al.** (45) **Date of Patent:** **\*\* May 16, 2023**

(54) **POOL BRUSH HEAD** D718,058 S \* 11/2014 Petti ..... D4/128  
 8,943,640 B2 \* 2/2015 Saccoccio ..... E04H 4/1609  
 15/160  
 (71) Applicant: **Ningbo Dongchuan Swimming Pool Equipment Co., Ltd., Ningbo (CN)** D757,446 S \* 5/2016 Ewert ..... D4/133  
 D826,500 S 8/2018 Larouche  
 D827,959 S 9/2018 Larouche  
 10,188,200 B1 1/2019 Hetzner  
 D897,690 S 10/2020 Carriere  
 D939,217 S 12/2021 Dai  
 (72) Inventors: **Huaizhong He, Ningbo (CN); Hu Zhang, Ningbo (CN)** 2002/0083536 A1 7/2002 Holiday  
 2004/0143923 A1 7/2004 Bensussan  
 2014/0007366 A1 1/2014 Saccoccio et al.  
 2014/0123422 A1 5/2014 Boyd  
 (73) Assignee: **Ningbo Dongchuan Swimming Pool Equipment Co., Ltd., Ningbo (CN)**  
 (\*\*) Term: **15 Years**

\* cited by examiner

(21) Appl. No.: **29/835,842**(22) Filed: **Apr. 21, 2022**(51) **LOC (14) CL** ..... **04-01**(52) **U.S. CL** ..... **D4/128**  
 USPC

(58) **Field of Classification Search**  
 USPC ..... D4/131-138; D7/393, 395, 401.2;  
 D8/82, 83, 107, 300, 303; 81/489, 492;  
 D28/28, 30, 63; D30/158, 159; 119/600,  
 119/611-616, 625, 633  
 CPC ..... A47L 13/52; A47L 13/12; A47L 13/00;  
 A47L 13/20; A47L 13/24; A47L 13/22;  
 A46B 7/04; A46B 7/06; A46B 5/00;  
 B43M 11/02  
 See application file for complete search history.

(56) **References Cited**

U.S. PATENT DOCUMENTS

6,148,466 A 11/2000 Smiell, III et al.  
 8,707,503 B2 \* 4/2014 Saccoccio ..... A46B 9/026  
 15/160

Primary Examiner — Austin Murphy

(74) Attorney, Agent, or Firm — Raymond Y. Chan;  
 David and Raymond Patent Firm(57) **CLAIM**

The ornamental design for a pool brush head, as shown and as described.

**DESCRIPTION**

FIG. 1 is a perspective view showing my new design.

FIG. 2 is another perspective view thereof.

FIG. 3 is a front view thereof.

FIG. 4 is a rear view thereof.

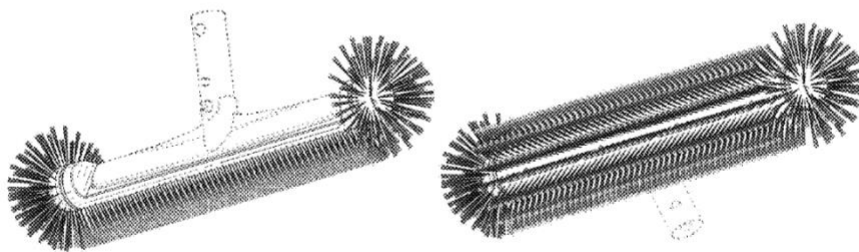
FIG. 5 is a left end view thereof.

FIG. 6 is a right end view thereof.

FIG. 7 is a top view thereof; and,

FIG. 8 is a bottom view thereof.

The broken-lines in the drawings are for illustrative purposes only and forming no part of the claimed design.

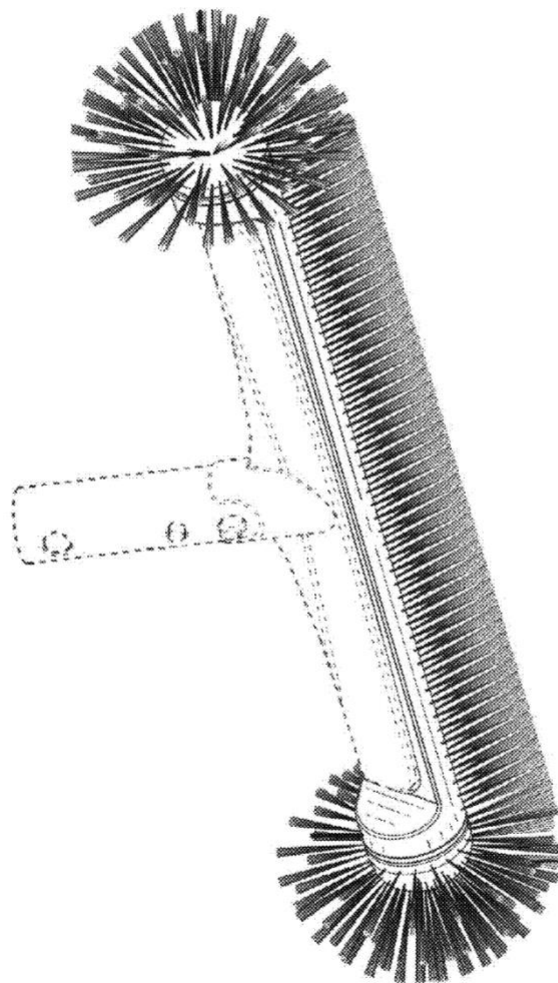
**1 Claim, 7 Drawing Sheets**

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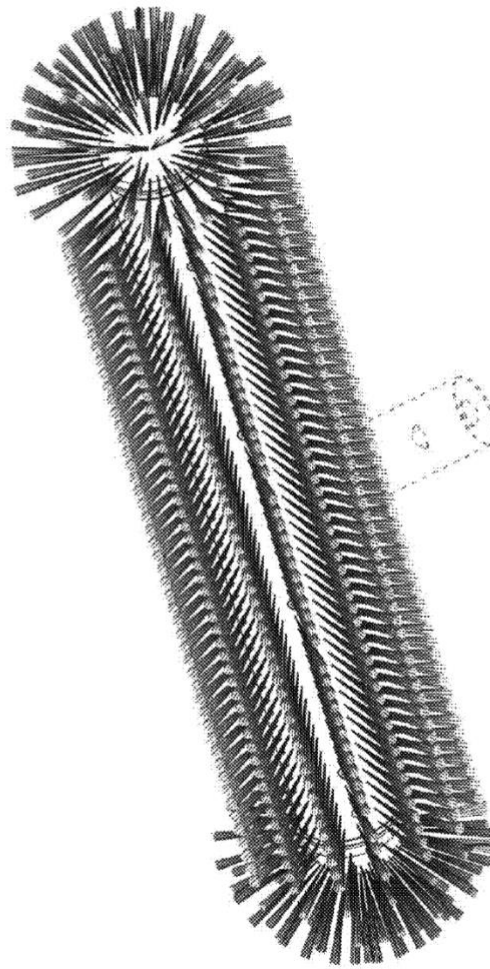


FIG. 2

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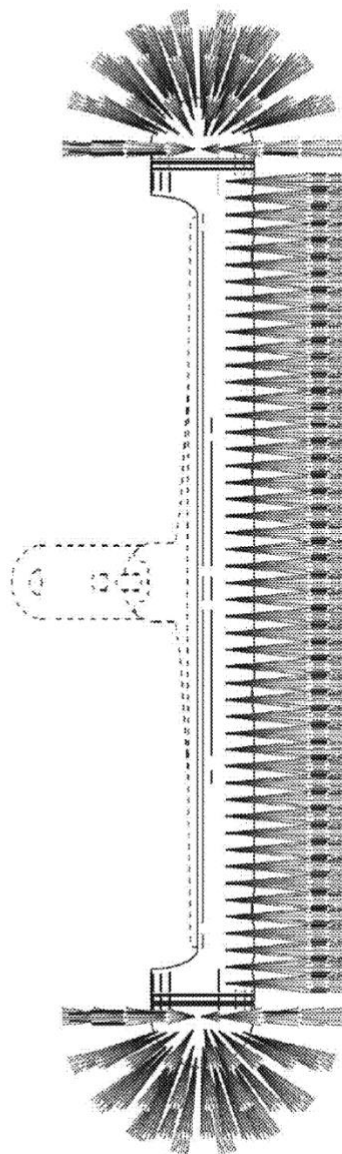


FIG. 3

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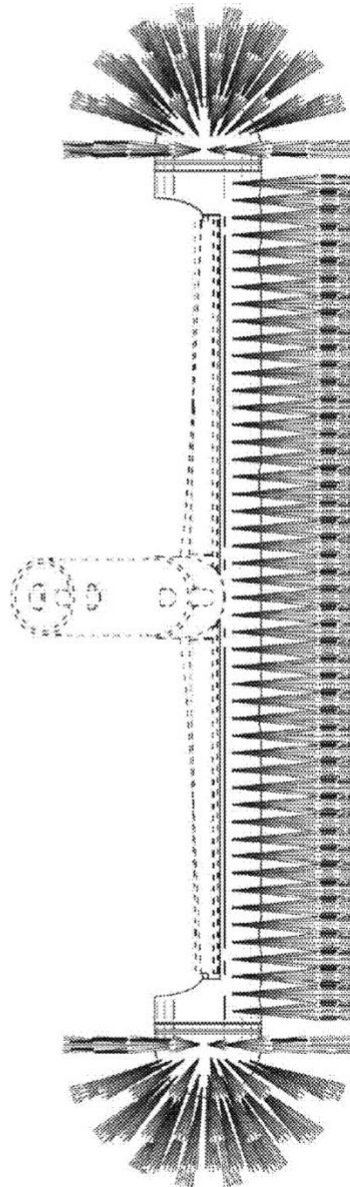


FIG. 4

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FIG. 6

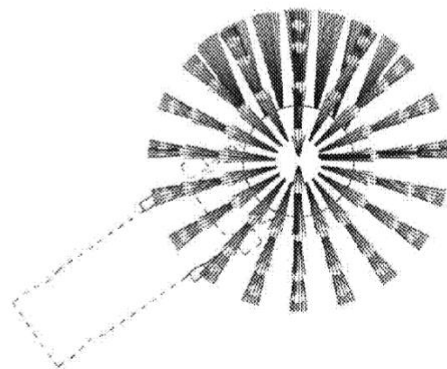


FIG. 5

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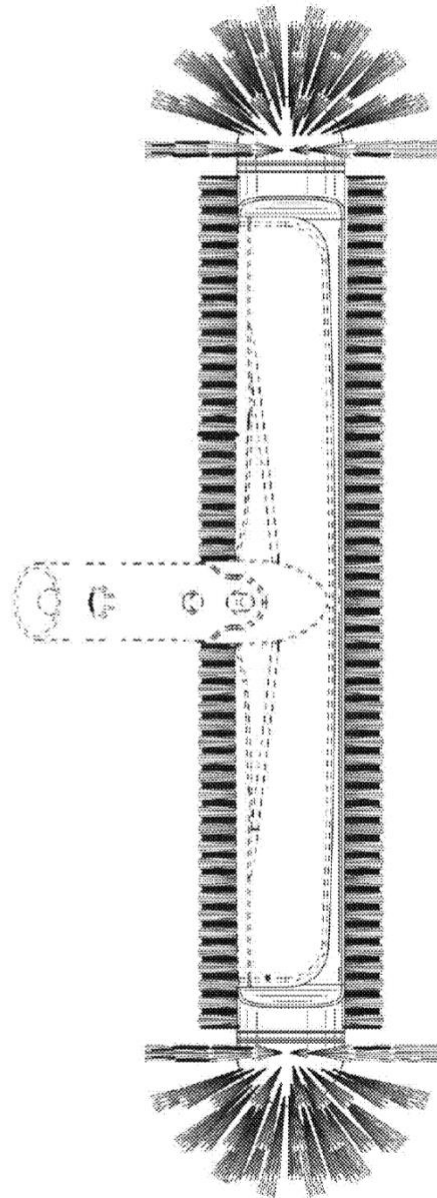


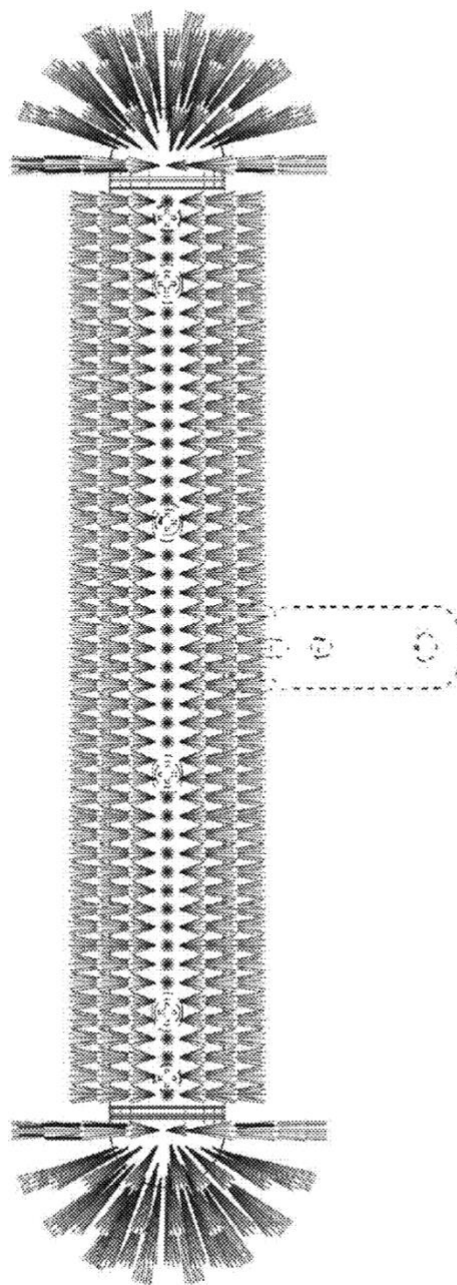
FIG. 7

U.S. Patent

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## EXHIBIT 2



**Seller: ONDWAY Brand: LALAPOOL**

US D985,947	Accused Product	Remarks
 FIG. 1		The claimed design reads upon the ONDWAY pool brush head
 FIG. 2		
 FIG. 3		<a href="https://www.amazon.com/Professional-Swimming-Pool-Wall-Tile-Brush/dp/B07K111111">Amazon.com: Professional Swimming Pool Wall &amp; Tile Brush, with Hemispherical Ends, 17.5" Heavy Duty Aluminum Back Head for Cleans Walls, Tiles &amp; Floors, 7 Rows Premium Nylon Bristles with EZ Clips (Green Grey) : Patio, Lawn &amp; Garden</a>
 FIG. 4		
 FIG. 5		
 FIG. 6		
 FIG. 7		
 FIG. 8		



# EXHIBIT 3

Seller: POOLCLEAN US STORE

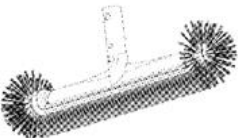

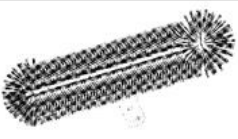

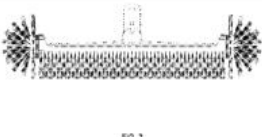

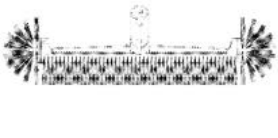



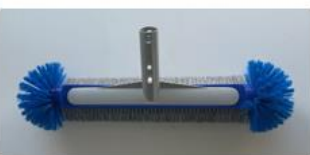
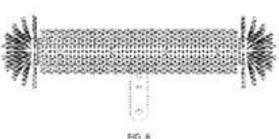

Brand: Unipool

US D985,947	Accused Product	Remarks
 FIG. 1		The claimed design reads upon the POOLCLEAN US STORE pool brush head
 FIG. 2		
 FIG. 3		<a href="https://www.amazon.com/Professional-Swimming-Pool-Wall-Tile-Brush/dp/B07K111111">Amazon.com: Professional Swimming Pool Wall &amp; Tile Brush, with Hemispherical Ends, 17.5" Heavy Duty Aluminum Back Head for Cleans Walls, Tiles &amp; Floors, 7 Rows Premium Nylon Bristles with EZ Clips (Blue Black) : Patio, Lawn &amp; Garden</a>
 FIG. 4		
 FIG. 5		
 FIG. 6		
 FIG. 7		
 FIG. 8		

# EXHIBIT 4

Seller: USA WAREHOUSE

Brand: Tenrry

US D985,947	Accused Product	Remarks
 FIG. 1		The claimed design reads upon the USA WAREHOUSE pool brush head
 FIG. 2		
 FIG. 3		<a href="https://www.amazon.com/dp/B08JYKJYKJ">Amazon.com: Tenrry Pool Brush Head, with Corner Cleaning Brush and Cured Bottom Bristle, 17.5" Metal Scrub Brush for Inground, Above Ground Swimming Pools, Algae Brush for Pool Walls, Gound, Pool Tile Scrubber : Patio, Lawn &amp; Garden</a>
 FIG. 4		
 FIG. 5		
 FIG. 6		
 FIG. 7		
 FIG. 8		

# EXHIBIT 5

Seller: BOWANJIE

Brand: Poolergetic

US D985,947	Accused Product	Remarks
 FIG. 1		The claimed design reads upon the BOWANJIE pool brush head
 FIG. 2		
 FIG. 3		
 FIG. 4		<a href="https://www.amazon.com/Poolergetic-Pool-Brush-Swimming-Pool-Brush-Head-Pool-Brushes-for-Cleaning-Pool-Walls-Corners-and-Steps-Nylon-Bristle-360-Pool-Brush-for-Inground-Above-Ground-Vinyl-Liners-Pool-with-EZ-Clip-Green-Patio-Lawn-Garden/dp/B07K111111">Amazon.com: Poolergetic Pool Brush Swimming Pool Brush Head, Pool Brushes for Cleaning Pool Walls Corners and Steps, Nylon Bristle 360 Pool Brush for Inground/Above Ground Vinyl Liners Pool with EZ Clip (Green) : Patio, Lawn &amp; Garden</a>
 FIG. 5		
 FIG. 6		
 FIG. 7		
 FIG. 8		

# EXHIBIT 6

**Seller: INPOOL US STORE Brand: Unipool**

US D985,947	Accused Product	Remarks
 <p>FIG. 1</p>		<p>The claimed design reads upon the INPOOL US STORE pool brush <u>head</u></p>
 <p>FIG. 2</p>		
 <p>FIG. 3</p>		<p><a href="https://www.amazon.com/dp/B08JLQZQZQ">Amazon.com: Professional Swimming Pool Wall &amp; Tile Brush, with Hemispherical Ends, 17.5" Heavy Duty Aluminum Back Head for Cleans Walls, Tiles &amp; Floors, 7 Rows Premium Nylon Bristles with EZ Clips (Green Grey); Patio, Lawn &amp; Garden</a></p>
 <p>FIG. 4</p>		
 <p>FIG. 5</p>		
 <p>FIG. 6</p>		
 <p>FIG. 7</p>		
 <p>FIG. 8</p>		



# EXHIBIT 7

Seller: DEWFOND

Brand: Dewfond

US D985,947	Accused Product	Remarks
 FIG. 1		The claimed design reads upon the DEWFOND pool brush head
 FIG. 2		
 FIG. 3		<a href="https://www.amazon.com/dp/B08JYKJYKJ">Amazon.com: Pool Brush, 18" Pool Brushes for Cleaning Pool Walls, Premium Nylon Bristles Pool Brush Head with EZ Clip (Blue+Gray) : Patio, Lawn &amp; Garden</a>
 FIG. 4		
 FIG. 5		
 FIG. 6		
 FIG. 7		
 FIG. 8		

# EXHIBIT 8

Seller: DIGIGER

Brand: Tongyi

US D985,947	Accused Product	Remarks
 FIG. 1		The claimed design reads upon the DIGIGER pool brush head
 FIG. 2		
 FIG. 3		<a href="https://www.amazon.com/dp/B08JLQZQZQ">Amazon.com: Pool Brush Head, Professional Swimming Pool Wall &amp; Tile Brush with Round Ends, Durable Around Nylon Bristles Pool Cleaning Brush with EZ Clip Aluminum Handle (Blue Grey) : Patio, Lawn &amp; Garden</a>
 FIG. 4		
 FIG. 5		
 FIG. 6		
 FIG. 7		
 FIG. 8		

# EXHIBIT 9

Seller: MOTOBUDDY Store

Brand: Motobuddy

US D985,947	Accused Product	Remarks
 FIG. 1		The claimed design reads upon the MOTOBUDDY pool brush <u>head</u>
 FIG. 2		
 FIG. 3		<a href="https://www.amazon.com/dp/B07K111111">Amazon.com: MOTOBUDDY Pool Brush Head for Cleaning Pool Walls, Heavy Duty Inground Above Ground Swimming Pool Scrub Brushes for Pebble Tech, Premium Strong Bristle &amp; Reinforced Aluminium Back; Patio, Lawn &amp; Garden</a>
 FIG. 4		
 FIG. 5		
 FIG. 6		
 FIG. 7		
 FIG. 8		