

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

Jiaren Zhu, individual

Plaintiff,

v.

THE PARTNERSHIPS, AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE "A",
Defendants.
and DOES 1-30, inclusive,

Defendants.

Case No.

**FILED UNDER SEAL PURSUANT
LOCAL RULE 26.2**

COMPLAINT

Complaint Filed:

COMPLAINT

FILED UNDER SEAL PURSUANT TO LOCAL RULE 26.2

Jiaren Zhu

Pro Se

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COMPLAINT

FILED UNDER SEAL PURSUANT TO LOCAL RULE 26.2

Plaintiff Jiaren Zhu (“Plaintiff”) hereby brings the present action against the Corporations, Partnerships and Unincorporated Associations identified on Schedule A attached hereto (collectively, “Defendants”) and alleges as follows:

I. JURISDICTION AND VENUE

1. This Court has original subject matter jurisdiction over the claims in this action pursuant to the provisions of the Patent Act, 35 U.S.C. § 1, et seq., 28 U.S.C. § 1338(a)-(b) and 28 U.S.C. § 1331.

2. Venue is proper in this Court pursuant to 28 U.S.C. § 1391.

3. This Court may properly exercise personal jurisdiction over Defendants since each of the Defendants directly targets business activities toward consumers in the United States, including illinois, through the fully interactive e-commerce stores¹ operating listed on e-commerce platforms, namely Amazon, under the seller aliases identified in Schedule A attached hereto (the “Aliases”). Specifically, Defendants have targeted sales to Illinois residents by setting up and operating e-commerce stores on e-commerce platforms, such as Amazon. Defendants target the said consumers using one or more Seller Aliases, offer shipping to the said consumers located in the United States, including Illinois, accept payment in U.S. dollars and, on information and belief, have sold products featuring Plaintiff’s patented design to residents of Illinois. Each of the Defendants is committing tortious acts in Illinois, is engaging in interstate commerce, and has wrongfully caused Plaintiff substantial injury in the State of Illinois.

II. INTRODUCTION

¹ The e-commerce store urls are listed on Scheduled A hereto under the Online Marketplaces.

4. Plaintiff files this action against the Defendants listed in Schedule A for the alleged infringement upon Plaintiff's patented design, U.S. Patent No. D813317S (hereinafter, "Patented Design"), as shown in **Exhibit 1**. Defendants in this action set up e-commerce stores on e-commerce platforms, such as Amazon.com and operate such stores using one or more of their Aliases. Defendants are engaged in the making, marketing, shipping, using, offering to sale, selling, and/or import to the United States for subsequent sale or use of certain unauthorized and unlicensed products, namely the magnetic keyholder to which the Patented Design shown in **Exhibit 1** was applied (hereinafter, the "Infringing Products"). Plaintiff alleges that Defendants' actions regarding the Infringing Products constitute infringement upon Plaintiff's patented design, and negatively impact Plaintiff's and business reputation.

III. THE PARTIES

5. Plaintiff is an individual, and for all the times material to the Complaint, a resident in the People's Republic of China. Plaintiff has been engaging in creating designs for daily use gadgets that are both functional and aesthetic pleasing. In or around July of 2023, Plaintiff created the design for certain magnetic keyholders.

6. After the said design was created, Plaintiff started marketing the the magnetic keyholders using such design (hereinafter, "Plaintiff's Product") via several e-commerce platforms, including Amazon.com. On Amazon.com, Plaintiff's Product was listed under the brands of Yoolon and TAMIDN, and using the keywords of "Magnetic Key Holder Under Car", "Hide A Jey Outside/Outdoor", "Hidden Key Holder", and "Waterproof Key Hider/Box." For the facts relevant to this lawsuit, Plaintiff's Products are distributed and sold to the consumers in the United States, including Illinois, mostly through the platform of Amazon.com. Plaintiff takes pride in the quality and aesthetic designs of its products.

7. On or about September 29, 2023, Plaintiff, through its agents, filed an application for patenting the said design for the magnetic keyholder, which is listed in **Exhibit 1**. On or about April 2, 2024, the patent was lawfully issued to the applicant, with U.S. Patent No. D813317S. Plaintiff is the lawful assignee of all rights, title, and interest in and to the Patented Design.

8. Defendants are individuals and business entities that own and operate one or more of the e-commerce stores with or under the Aliases identified on **Schedule A**. On information and belief, Defendants reside and/or operate in the People's Republic of China. Although Defendants operate under the Aliases, such Aliases are linked or associated, through certain unique identifiers, to the Defendants, their true names and locations, and suggest that Defendants operate arising out of the same transaction, occurrence, or series of transactions or occurrences. Defendants have the capacity to be sued pursuant to Federal Rule of Civil Procedure 17(b).

9. Certain Aliases under which Defendants operate their e-commerce stores are not linked or associated to the true names of the Defendants. The reason why these Aliases are not connected with the true names of the Defendants is that Defendants employed such tactics to conceal their identities and true scope of their operation. Plaintiff pleads with the Court that further discovery is allowed for Plaintiff to obtain such information regarding the Defendants' true identities. Once Plaintiff obtains such information, Plaintiff will amend the Complaint accordingly.

IV. GENERAL FACTS

10. Plaintiff sells Plaintiff's Product through the e-commerce stores and brands it owns, and operates, including the brands of Yoolon and TAMIDN. Recently, Plaintiff have discovered an increasing number of fully interactive, and active e-commerce stores that have been selling Infringing Products to consumers in Illinois and throughout the United States. For instance, the e-commerce store listed on Amazon with the Aliases of *don_____e*, AA_____ and etc. sell

magnetic keyholders almost identical to Plaintiff's Patented Design. **Exhibit 2**, a list of the said stores and the photos products they are selling.

11. Defendants, using one or more Aliases, have targeted sales to Illinois residents by opening and operating ecommerce stores that target United States consumers. Defendants also offer shipping to the United States, including Illinois, accept payment in U.S. dollars and, on information and belief, have sold Infringing Products to the residents of Illinois.

12. Defendants operating under the Aliases are sophisticated sellers. They operate e-commerce stores, engage in marketing and sales activities, and accept payments in U.S. dollars via credit cards, Alipay, Amazon Pay, Zelle, Venmo, and/or PayPal. Defendants' stores look like Plaintiff's store. Defendants' e-commerce websites include similar elements and keywords like Plaintiff's store. Defendants sell Infringing Products that have a similar design to Plaintiff's Patented Design. To the consumers at large, it would be impossible to differentiate the said Infringing Products from Plaintiff's products from the Patented Designs. It would also be impossible for the consumers to realize that the Defendants did not have the authorization to market, offer to sell, or sell the products with the Patented Designs.

13. Third-party platforms like Amazon.com do not require the sellers to verify their identities, beyond their provision of the Aliases. This lack of requirement for identity verification creates loopholes for Defendants to utilize. On information and belief, many of the Defendants would register multiple Aliases through the platforms and market and sell products via the multiple accounts registered with the Aliases. This tactic allows Defendant to hide their true identities and scope of their business. In addition, this tactic allows Defendants to avoid lawsuits and legal liabilities. For example, when a claimant (similar to the Plaintiff here) discovered a tort or infringement committed by a particular Aliases, the claimant may try to allege the claims against

the individual/entities behind the Aliases. Then, the individual/entity may well close the Alias, and quickly moves to the next Alias and account, and avoid the liabilities associated with the previous Alias. **For the claimant (and the true holders of the rights), it will be a forever-lasting “Wack-A-Mole” game.**

14. The approach to obtain the true identities of the Defendants is to realize that the Alias may share unique identifiers, as the use of the same/similar marketing strategies, same or similar elements in the e-commerce stores’ décor, same or similar payment methods, similar description of the products, and similar prices and product images. Sometimes, the reviews left on the e-commerce stores also reveal that certain stores are owned and operated by the same individuals/entities.

15. Defendants are working in active concert to knowingly and willfully manufacture, import, distribute, offer for sale, and sell Infringing Products in the same transaction, occurrence, or series of transactions or occurrences. Defendants, without any authorization or license from Plaintiff, have jointly and severally, knowingly and willfully offered for sale, sold, and/or imported into the United States for subsequent resale or use the same product that infringes directly and/or indirectly Plaintiff’s Design. Each e-commerce store operating under the Alias offers shipping to the United States, including Illinois, and, on information and belief, each Defendant has sold Infringing Products into the United States and Illinois over the Internet.

16. Defendants’ infringement of the Plaintiff’s Design in the making, using, offering for sale, selling, and/or importing into the United States for subsequent sale or use of the Infringing Products was willful.

17. Defendants’ infringement of the Plaintiff’s Design in connection with the making, using, offering for sale, selling, and/or importing into the United States for subsequent sale or use

of the Infringing Products, including the making, using, offering for sale, selling, and/or importing into the United States for subsequent sale or use of Infringing Products into Illinois, is irreparably harming Plaintiff.

COUNT I
INFRINGEMENT OF UNITED STATES DESIGN PATENT NO. D813317S
(35 U.S.C §271)

18. Plaintiff hereby re-alleges and incorporates by reference the allegations set forth in the preceding paragraphs.

19. Defendants have infringed Plaintiff's Patent No. D813317S by making, using, offering for sale, selling, and/or importing into the United States for subsequent sale or use Infringing Products.

20. Defendants' infringement of Plaintiff's Patent No. D813317S caused Plaintiff irreparable harm, including the loss of its lawful patent rights to exclude others from making, using, selling, offering for sale, and importing the patented products.

21. Defendants have infringed Plaintiff's Patent and will continue to infringe the said patent unless enjoined by the Court.

22. Plaintiff is entitled to injunctive relief pursuant to 35 U.S.C §283.

23. Plaintiff is also entitled to recover damages adequate to compensate for the losses caused by the infringement, including Defendants' profits pursuant to 35 U.S.C. §289. Plaintiff is entitled to recover other damages, including attorney's fees, and punitive damages pursuant to 35 U.S.C. §284.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

(1) That Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with them be

temporarily, preliminarily, and permanently enjoined and restrained from:

- a. making, using, offering for sale, selling, and/or importing into the United States for subsequent sale or use any products not authorized by Plaintiff and that include any reproduction, copy or colorable imitation of the design claimed in the Patented Design;
- b. aiding, abetting, contributing to, or otherwise assisting anyone in infringing upon the Patented Design; and
- c. effecting assignments or transfers, forming new entities or associations or utilizing any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth in Subparagraphs (a) and (b).

(2) Entry of an Order that, upon Plaintiff's request, those with notice of the injunction, including, without limitation, any online marketplace platforms such as eBay, AliExpress, Alibaba, Amazon, Taobao, T-Mall (collectively, the "Third Party Providers") shall disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of goods that infringe the ornamental design claimed in the Patented Design;

3) That Plaintiff be awarded such damages proven at trial against Defendants.

Dated this 12th day of June, 2024.

Respectfully submitted,

/s/ jiaren zhu
Jiaren Zhu

SCHEDULE A

Jiaren Zhu v. The Partnerships and Unincorporated Associations**Identified on Schedule "A " - Case No.**

Schedule A			
Defendant Online Marketplaces			
No.	Seller ID	Name / Seller Alias	ASIN
1	A2RNAKGT5U12BG	dongzhanstore	B0CZD24L4X
2	A2YWTUW0TYKFDG	TecValley	B0CJV166CC
3	AQRWPOWR99ZM4	CHRYMUM	B0CRDJ66QR
4	A3P0RLC73U3IAI	AUGXparts	B0CTKGNW3P
5	A1VKX0E0TF8AGW	AAUTOOKK	B0CPDNJBLR
6	AMYHBAVCH50BX	Han Department	B0CM6P117W
7	A8BRJCHWR4RDW	maiguangshangyu	B0CTKFKMX1
8	A25TOYMDHTAO0X	BENGBUM	B0CRKSX379
9	A2ULI3RKJYDMAS	QUQUMEW	B0CQT2K67R
10	AXV7HE3XOLHQP	BIHUAN	B0CSFZN5ZP
11	A283RO9I4OL9NM	KMUXEJ	B0CTK9LQF3
12	ASOLXJUVYCSMH	ZAZALHH	B0CYCF3G5Z
13	ARV43GLGWUEHQ	bluecookies	B0CQM8P3DB
14	A1ZPR7DZVT4BNB	YIHUANYAG	B0CQMBBV1P
15	AYGDN6NQA5CUM	BENGTING	B0CQK3DQFY
16	A30V50FB6X6G41	YESPC	B0CQ2HF29D
17	A35PYP1ZATF1P9	LVOUP SHOP	B0CKVSJWSX
18	A328S5ILIP7500	GUZIKO	B0CT5J9ST7
19	A3SHDIBROO402P	GTsea	B0CNC2HWNH
20	A2KQZGW5F9KTPG	Mrschen	B0CR93JQS4
21	A1PLP6RZGDCONT	YUECHENE	B0CQJWBKTQ
22	A1QCPULZZIUX6J	Lecctso	B0CPV6HM97
23	AOXKFSZR23KWL	YUMAOHU	B0CQS7628K

24	A2RAN8RK60GTXB	JINGTAO88	B0CMZK6K26
25	A3MI3JMQW1U465	家家乐精品铺子	B0CMP7VZX4
26	A2W80WBBBNGNYU	CHUANGYING2023	B0CQP1Z2DW
27	AU2CN3G5MAZDD	DREAMOON	B0CNGL5XXX
28	A1P2VQOK4XWVKR	EZLIFE-US	B0CP5J6VYT
29	AMPM4PC1Z3WK4	DeShaoNvFengShangMao	B0BQCDMLBL
30	A62BOHYQJIN51	MYLD STORE	B0CR98VCCD
31	A26NYE7SVBYPNO	MISS.H	B0CN3F8QYN
32	A2TFECUYOCXPXB	Tomjix	B0CR5QC9RS
33	A3VOMM9X9LESXS	Lings-Fire	B0CQTDPPDY
34	A2T3KFBEXF444I	LINMO	B0CL9SBC41
35	A2PL10RCF3XVJG	Kunstore	B0CQRSRTVT
36	AYC3VZA8MXCM1	3-eyes	B0CRR92VK2
37	A3F9OLYRUSQ1XP	dehuaxianyanlaiyanxibaihuoshanghang	B0D426PWWX
38	A3GU5C3NS653S2	Zhang11	B0CN4H6Y68
39	A32N51ZHBMU62Q	HLsw	B0D4675PHC
40	ATF7HD8N243UI	JIANHONG	B0BS3RHFHG
41	A20TMSSMDPYQTT	yunquwangluokejiyouxiangongsi	B0D426PWWX
42	A2NNSEK3YZOZYL	AWANGDE	B09VDW4BCK
43	A16DFT38YDAGSW	wenlixue	B09QKGHCDC
44	A2BLPFBYGJPOB5	CAT-NAP-STORE	B0D4F1S2YP
45	A28GNERZ9M2C8R	LAITIANKANG	B0BJVC7HFG
46	A32H9SRE0H3QQB	MOFTOY	B0D46X9DBB
47	A31F62I687F3LI	Pro-PCB	B0CSKJW6SL
48	A28I5BE99RZR97	Life Expert-US	B0BZ4RX5NT
49	A3AOSQL265XMNE	jghjrtyrdfgt	B07ZM37477
50	AUGH9N9CDTGOL	Wang Ziqi	B0D45JK9DN

EXHIBIT 1



US0D1020230S

(12) **United States Design Patent** (10) **Patent No.:** **US D1,020,230 S**
Zhu (45) **Date of Patent:** **** Apr. 2, 2024**

(54) **MAGNETIC KEY HOLDER**

(71) Applicant: **Jianren Zhu**, Zhaoqing (CN)

(72) Inventor: **Jianren Zhu**, Zhaoqing (CN)

(**) Term: **15 Years**

(21) Appl. No.: **29/913,407**

(22) Filed: **Sep. 29, 2023**

(51) **LOC (14) Cl.** **03-01**

(52) **U.S. Cl.**
 USPC **D3/201**

(58) **Field of Classification Search**

USPC D3/201, 207, 208, 212, 273, 274, 293,
 D3/294, 303; D8/343; D12/400
 CPC .. A45C 11/325; B65D 85/20; B65D 23/1304;
 B65D 25/22; B65D 83/04; B65D 81/365;
 E05B 19/0005; Y10T 24/1379; Y10T
 70/8676

See application file for complete search history.

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(Continued)

Primary Examiner — Steven J Czyz

(74) Attorney, Agent, or Firm — Vladimir Postnikov

(57) **CLAIM**

The ornamental design for a magnetic key holder, as shown and described.

DESCRIPTION

FIG. 1 is a perspective view of a magnetic key holder showing the new design;

FIG. 2 is another perspective view thereof;

FIG. 3 is a front elevation view thereof;

FIG. 4 is a back elevation view thereof;

FIG. 5 is a left-side view thereof;

FIG. 6 is a right-side view thereof;

FIG. 7 is a top plan view thereof;

FIG. 8 is a bottom plan view thereof;

FIG. 9 is a perspective view in an open position thereof;

FIG. 10 is an enlarged view of the encircled portion in FIG. 1;

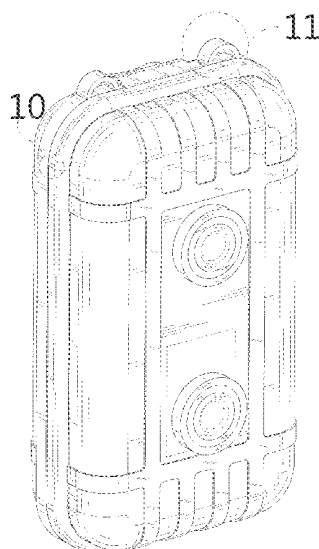
FIG. 11 is an enlarged view of the encircled portion in FIG. 1; and,

FIG. 12 is an enlarged view of the encircled portion in FIG. 9.

The broken lines depict portions of the magnetic key holder that form no part of the claimed design.

The dash-dot-dash lines represent boundary lines that form no part of the claimed design.

1 Claim, 12 Drawing Sheets



US D1,020,230 S

Page 2

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U.S. Patent

Apr. 2, 2024

Sheet 1 of 12

US D1,020,230 S

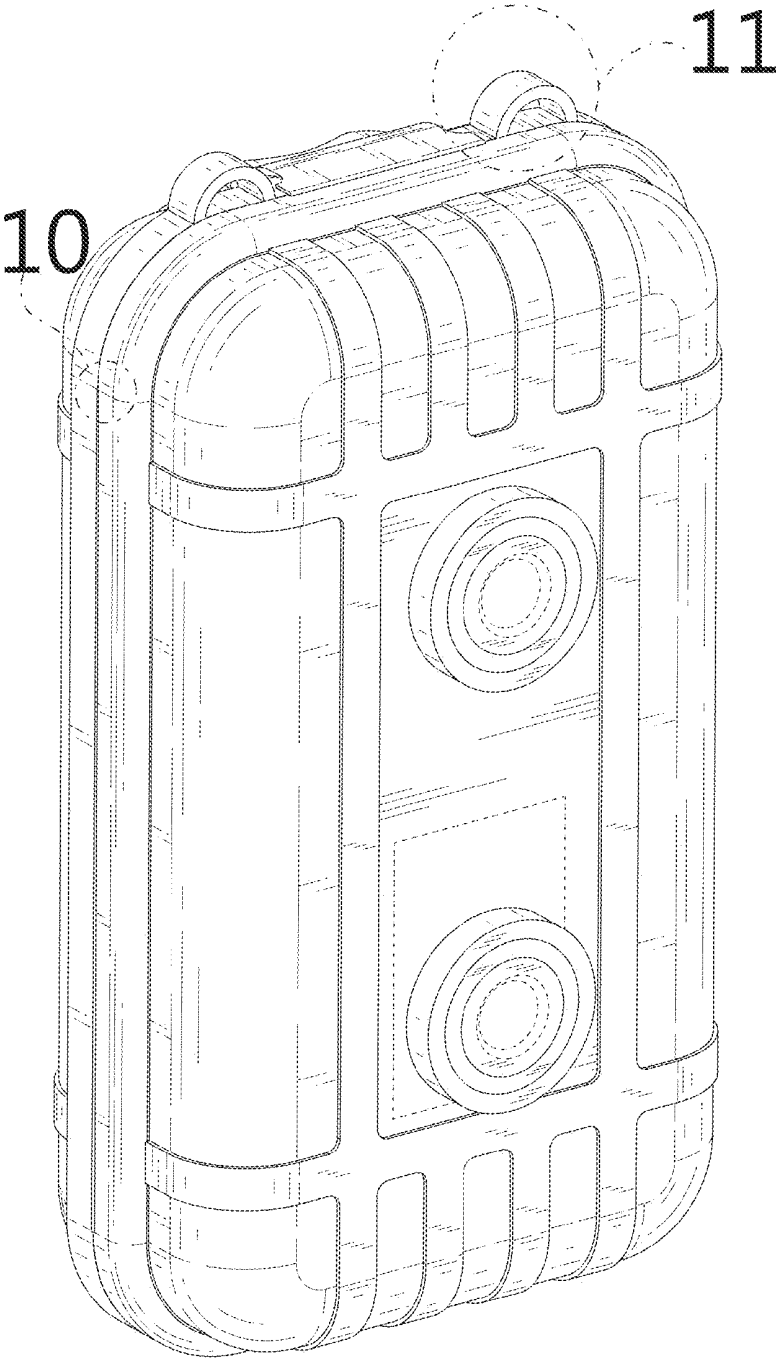


FIG. 1

U.S. Patent

Apr. 2, 2024

Sheet 2 of 12

US D1,020,230 S

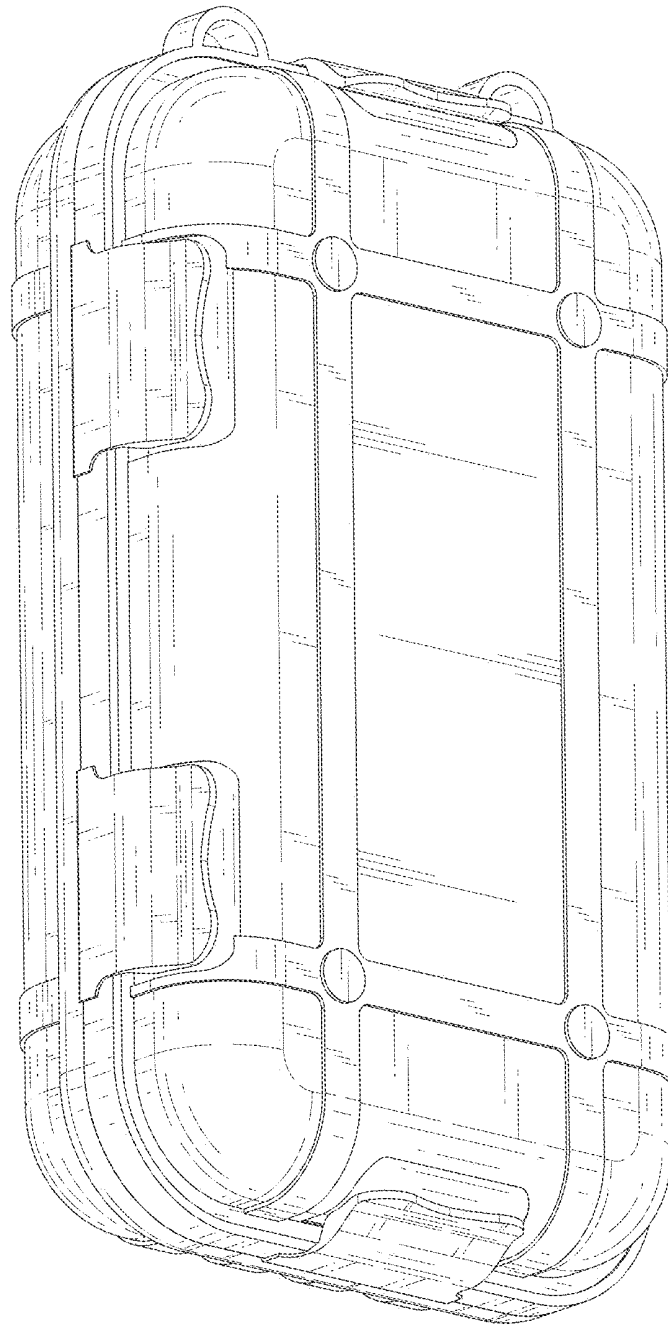


FIG. 2

U.S. Patent

Apr. 2, 2024

Sheet 3 of 12

US D1,020,230 S

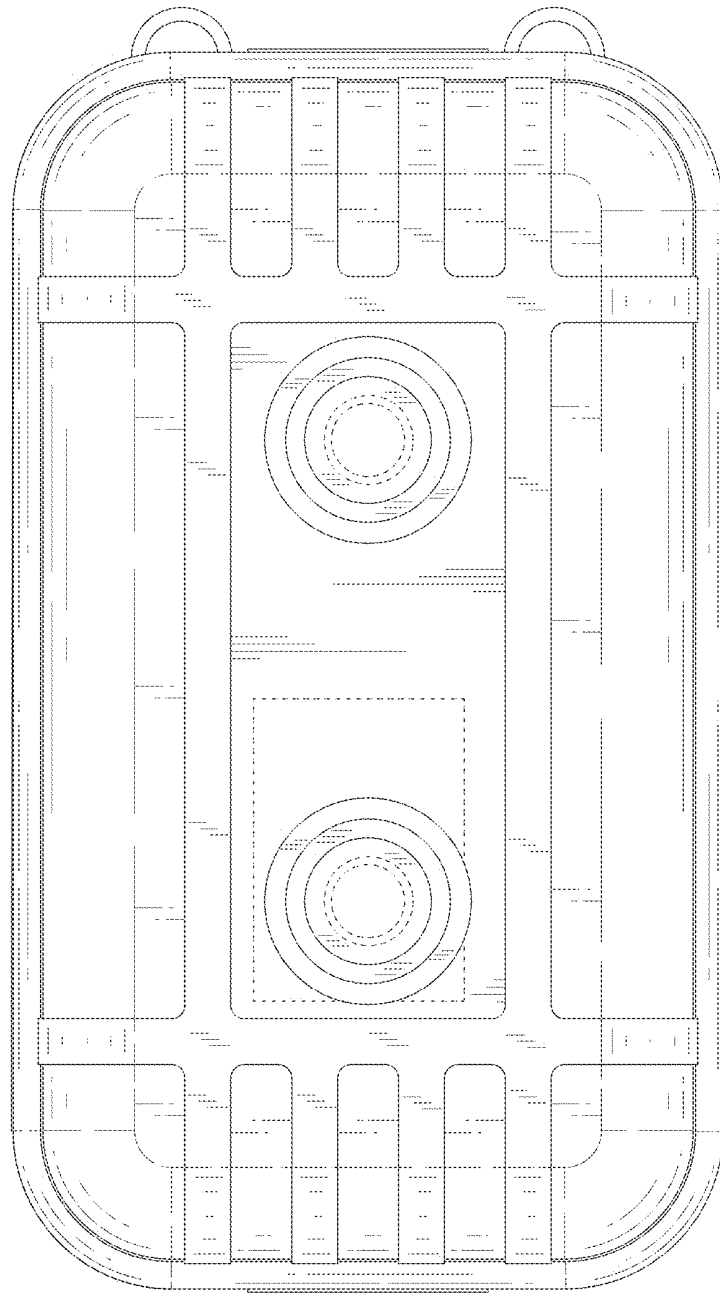


FIG. 3

U.S. Patent

Apr. 2, 2024

Sheet 4 of 12

US D1,020,230 S

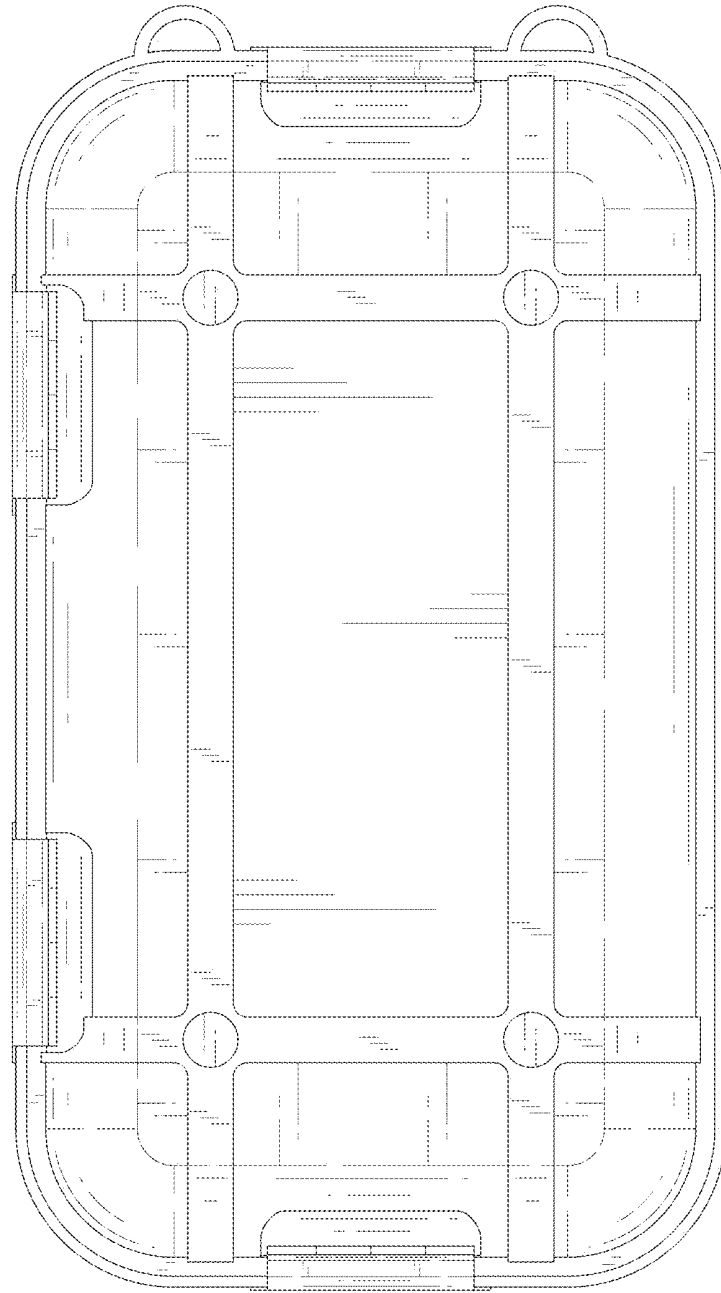


FIG. 4

U.S. Patent

Apr. 2, 2024

Sheet 5 of 12

US D1,020,230 S

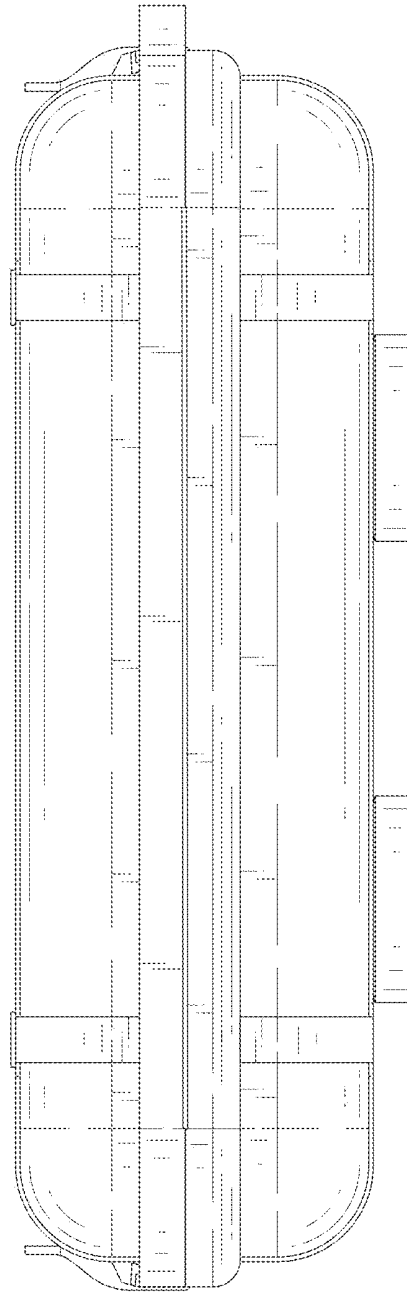


FIG. 5

U.S. Patent

Apr. 2, 2024

Sheet 6 of 12

US D1,020,230 S

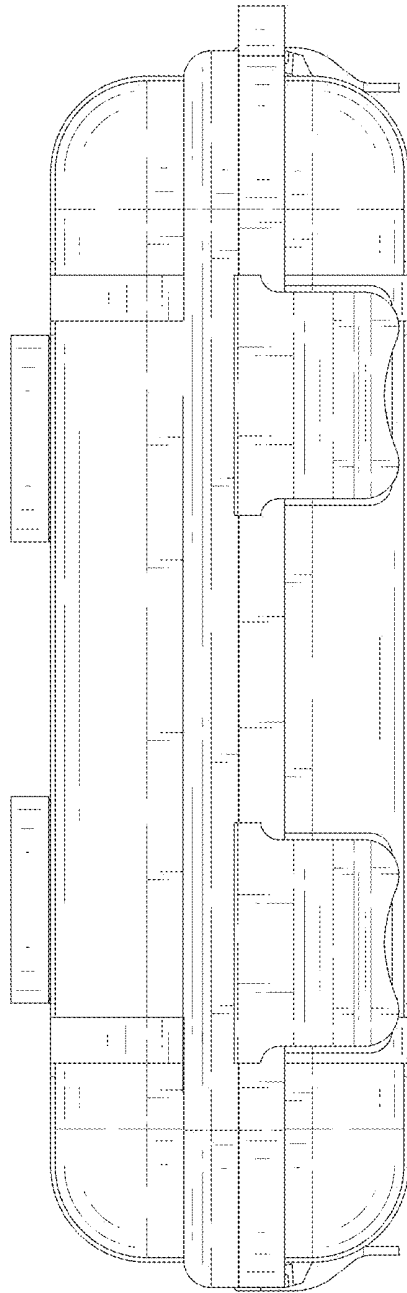


FIG. 6

U.S. Patent

Apr. 2, 2024

Sheet 7 of 12

US D1,020,230 S

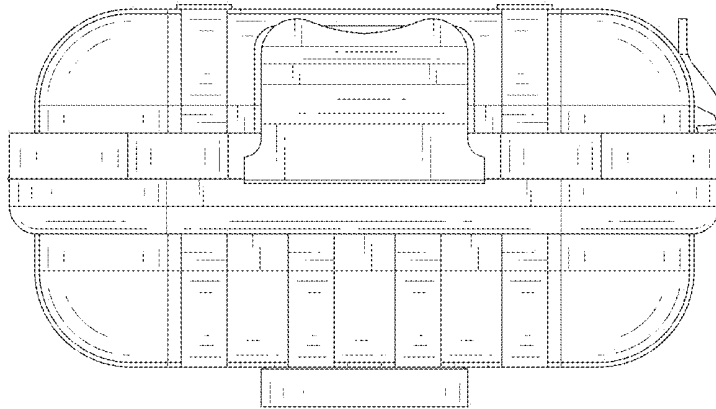


FIG. 7

U.S. Patent

Apr. 2, 2024

Sheet 8 of 12

US D1,020,230 S

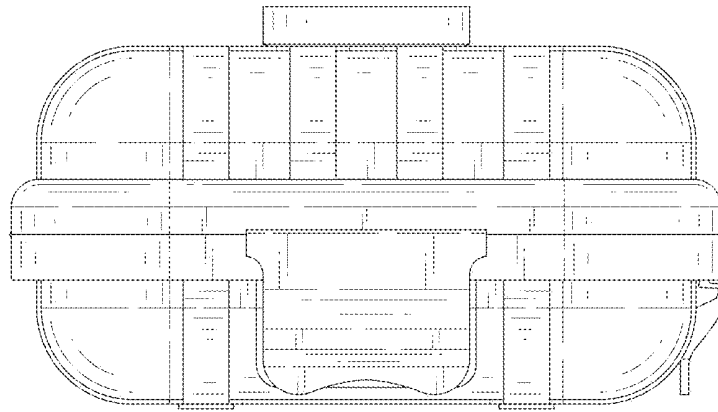


FIG. 8



FIG. 9

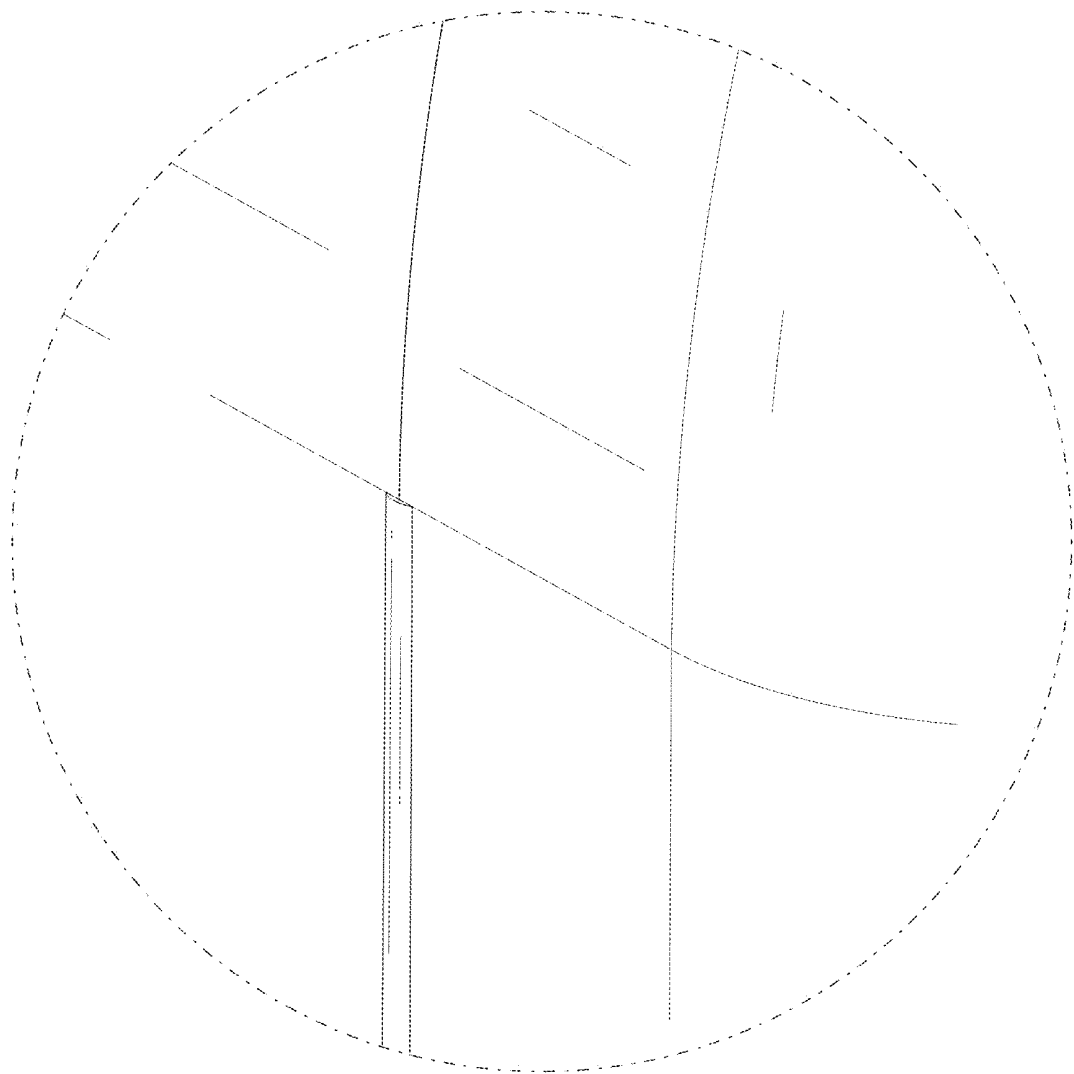


FIG. 10

U.S. Patent

Apr. 2, 2024

Sheet 11 of 12

US D1,020,230 S

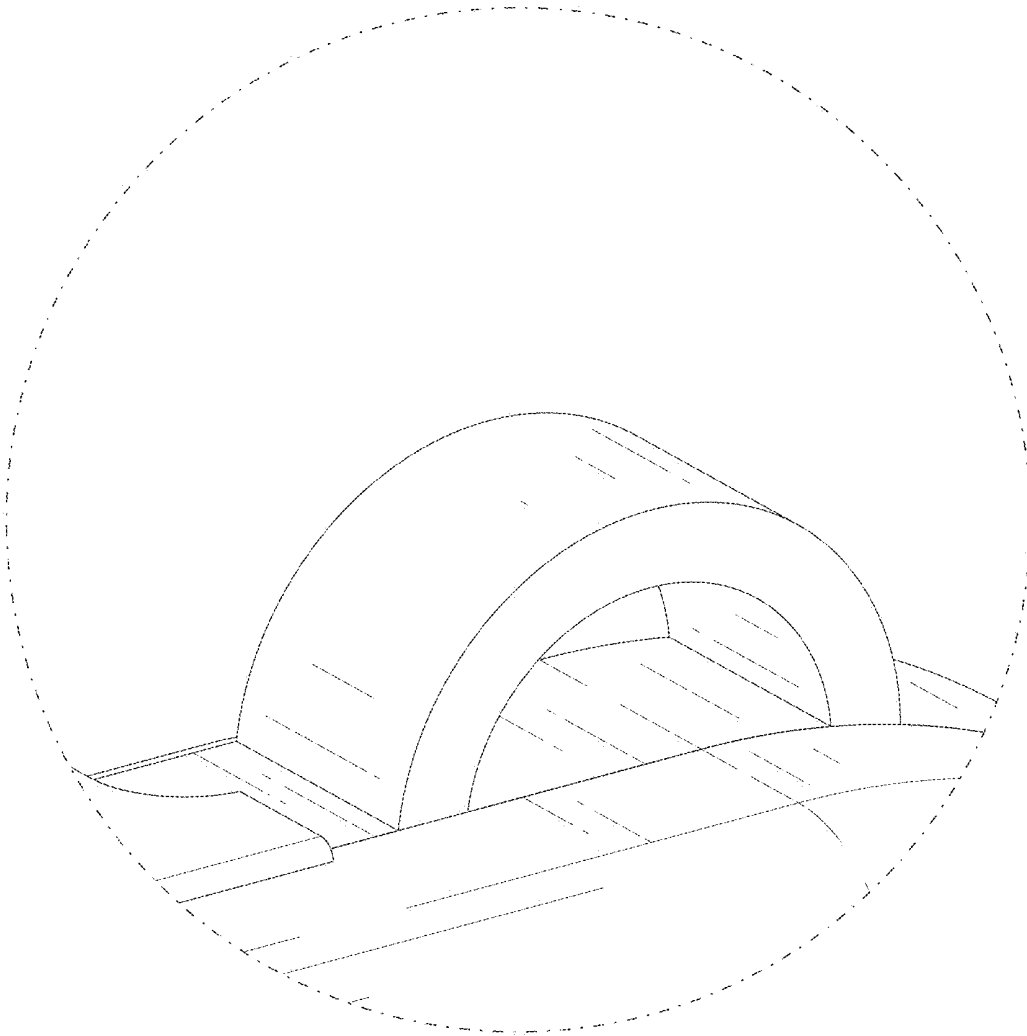


FIG. 11

U.S. Patent

Apr. 2, 2024

Sheet 12 of 12

US D1,020,230 S

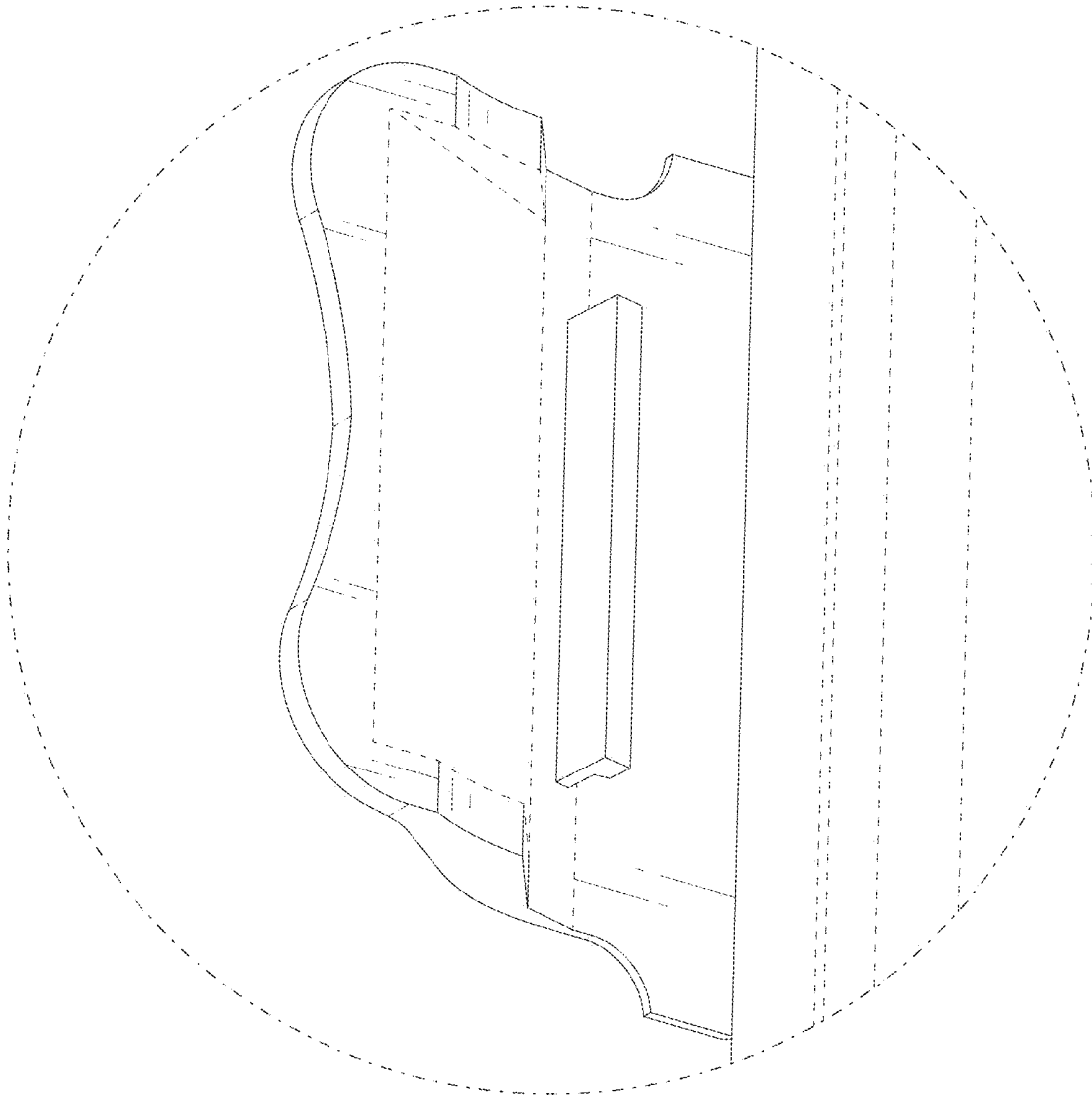
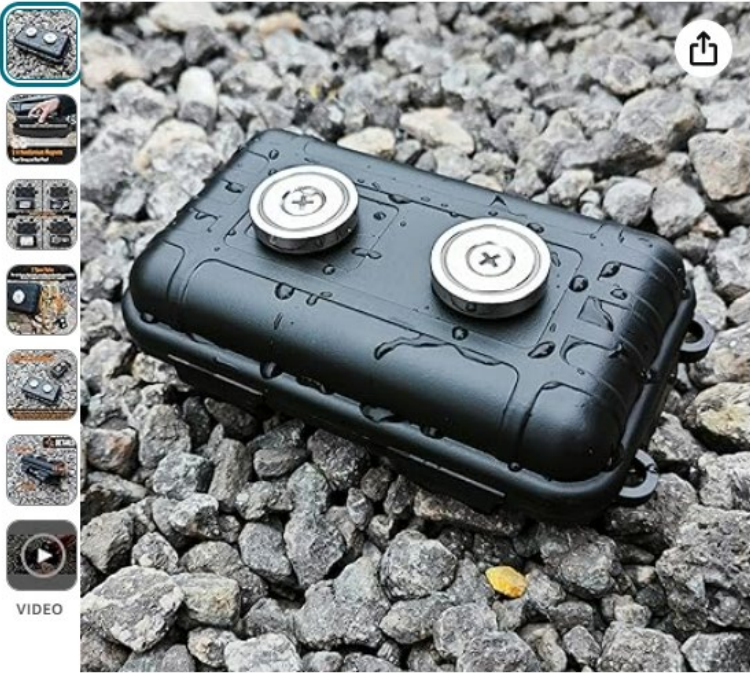


FIG. 12

EXHIBIT 2

◀ Back to results



Magnetic Key Holder
Under Car,Car Key
Holder,Weatherproof
Magnetic Key Box
Under Car,Hide a Key
Magnetic Key Box,Key
Holder Magnetic Key
Hider Outdoor,Hidden
Key Holder Under Car
【Splash Resistant】

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4.7 ★★★★★ 47 ratings
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200+ bought in past month

\$14⁹⁹

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2 Pcs Magnetic Key
Holders Under Car, Hide
Key Magnetic Box for
Storage Key Indoors,
Outdoors, Waterproof
Hider Key on The
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4.0 29 ratings

100+ bought in past month

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List Price: \$18.99

Two-Day

FREE Returns

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