

January 15, 2020

VIA ELECTRONIC FILING

The Honorable Lisa R. Barton
Secretary to the Commission
**U.S. INTERNATIONAL TRADE
COMMISSION**
500 E Street, SW, Room 112-A
Washington, D.C. 20436

Re: *Certain Portable Battery Jump Starters & Components Thereof, Inv. No. 337-TA-___*

Dear Secretary Barton:

In accordance with the Commission's Temporary Change to Filing Procedures dated March 16, 2020, Complainant The NOCO Company ("NOCO") submits the following documents in support of their request that the Commission commence an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended, concerning certain portable battery jump starters and components thereof.

Complainants submit the following documents for filing:

1. One (1) electronic copy of Complainants' verified Complaint, pursuant to Commission Rule 210.8(a)(1)(i);
2. One (1) electronic copy of the public exhibits and public versions of the confidential exhibits to the Complaint, pursuant to Commission Rules 210.8(a)(1)(i) and 210.12(a)(9)¹;
3. One (1) electronic copy of the confidential exhibits to the Complaint, reference in the Complaint as Confidential Exhibit Nos. 5C, 10C, 44C, and 105C pursuant to Commission Rules 201.6(c) and 210.8(a)(1)(ii);
4. One (1) electronic copy of the certified prosecution histories of each of the Asserted Patents included as Appendices A1 and B1 to the Complaint, pursuant to Commission Rule 210.12(c)(1);

5. Complainant has ordered certified copies of the assignments for the Asserted Patents cited in the Complaint and will supplement the complaint with those documents once they arrive, pursuant to Commission Rule 210.12(a)(9)(ii);

6. One (1) electronic copy of each patent and technical reference mentioned in the prosecution history of each of the Asserted Patents included as Appendices A2 and B2 pursuant to Commission Rule 210.12(c)(2);

7. One (1) electronic copy of NOCO's letter and certification pursuant to Commission Rules 201.6(b) and 210.5(d) requesting confidential treatment of information appearing in Confidential Exhibit Nos. 5C, 10C, 44C, and 105C;

8. A Statement Regarding the Public Interest regarding the remedial orders sought by Complainants, pursuant to Commission Rule 210.8(b).

Please contact me with any questions regarding this submission. Thank you for your attention to this matter.

Respectfully submitted,

/s/ Deanna Tanner Okun

Deanna Tanner Okun

V. James Adduci, II

Lauren E. Peterson

Juan J. Garcia

ADDUCI, MASTRIANI & SCHAUMBERG, L.L.P.

1133 Connecticut Avenue, N.W., 12th Floor

Washington, DC 20036

Telephone: (202) 467-6300

Facsimile: (202) 466-2006

E-Mail: NOCO-001@adduci.com

Michael J. Garvin

VORYS, SATER, SEYMOUR AND PEASE LLP

200 Public Square

Suite 1400

Cleveland, OH 44114-2327

Telephone: (216) 479-6100

Facsimile: (216) 479-6060

Email: mjgarvin@vorys.com

Rex W. Miller, II

VORYS, SATER, SEYMOUR AND PEASE LLP

52 East Gay Street

The Honorable Lisa R. Barton
January 15, 2021
Page 3

Columbus, OH 43215
Telephone: (614) 464-6207
Facsimile: (614) 719-4766
Email: rwmiller@vorys.com

Counsel for Complainant The NOCO Company

January 15, 2020

VIA ELECTRONIC FILING

***REQUEST FOR CONFIDENTIAL TREATMENT & CERTIFICATON REGARDING
REQUEST FOR CONFIDENTIAL TREATMENT***

The Honorable Lisa R. Barton
Secretary to the Commission
**U.S. INTERNATIONAL TRADE
COMMISSION**
500 E Street, SW, Room 112-A
Washington, D.C. 20436

Re: ***Certain Portable Battery Jump Starters & Components Thereof, Inv. No. 337-TA-___***

Dear Secretary Barton:

In accordance with Commission Rules 210.5(d) and 210.6(b)(1), 19 C.F.R. §§ 201.5 and 210.6, Complainant The NOCO Company (“Complainant”) respectfully requests confidential treatment of the business information contained in the Verified Confidential Complaint and Confidential Exhibits 5C, 10C, 44C, and 105C.

The information contained in the Verified Confidential Complaint and Confidential Exhibits 5C, 10C, 44C, and 105C qualifies as confidential business information pursuant to Commission Rule 201.6 because:

- a. It is not available to the public;
- b. Unauthorized disclosure of such information could cause substantial harm to Complainant’s competitive position; and
- c. Its disclosure could impair the Commission’s ability to obtain information necessary to perform its statutory function.

I certify that the proprietary commercial information, proprietary commercial relationships, and/or proprietary business information contained in the Confidential Complaint and Confidential Exhibits 5C, 10C, 44C, and 105C is not reasonably available to the public, and thus warrants confidential treatment.

The Honorable Lisa R. Barton

January 15, 2021

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Thank you for your attention to this matter. Please contact me with any questions regarding this submission.

Respectfully submitted,

/s/ Deanna Tanner Okun

Deanna Tanner Okun

V. James Adduci, II

Lauren E. Peterson

Juan J. Garcia

ADDUCI, MASTRIANI & SCHAUMBERG, L.L.P.

1133 Connecticut Avenue, N.W., 12th Floor

Washington, DC 20036

Telephone: (202) 467-6300

Facsimile: (202) 466-2006

E-Mail: NOCO-001@adduci.com

Michael J. Garvin

VORYS, SATER, SEYMOUR AND PEASE LLP

200 Public Square

Suite 1400

Cleveland, OH 44114-2327

Telephone: (216) 479-6100

Facsimile: (216) 479-6060

Email: mjgarvin@vorys.com

Rex W. Miller, II

VORYS, SATER, SEYMOUR AND PEASE LLP

52 East Gay Street

Columbus, OH 43215

Telephone: (614) 464-6207

Facsimile: (614) 719-4766

Email: rwmiller@vorys.com

Counsel for Complainant The NOCO Company

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, DC**

In the Matter of

**CERTAIN PORTABLE BATTERY
JUMP STARTERS AND
COMPONENTS THEREOF**

Investigation No. 337-TA-_____

CERTIFICATION REGARDING REQUEST FOR CONFIDENTIAL TREATMENT

I, Deanna Tanner Okun, counsel for Complainant The NOCO Company (“Complainant”), declare as follows:

1. I have reviewed Complainant’s Verified Confidential Exhibit Nos. 5C, 10C, 44C, and 105C (“the Confidential Exhibits”) filed concurrently with this Certification.
2. The Confidential Exhibits contain the following confidential business information of Complainant:
 - a. proprietary information not available to the public; and
 - b. confidential information related to the terms of agreements between Complainant and other parties regarding the Asserted Patents.
3. Disclosure of the information in the Verified Confidential Complaint and the Confidential Exhibits to the public would cause substantial harm to Complainant and its competitive position.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of January 2021 in Washington, D.C.

/s/ Deanna Tanner Okun
Deanna Tanner Okun
ADDUCI, MASTRIANI & SCHAUMBERG, LLP

1133 Connecticut Avenue, NW, 12th Floor
Washington, DC 20036
Telephone: (202) 467-6300
Facsimile: (202) 466-2006

Counsel for Complainant The NOCO Company

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.**

In the Matter of

**CERTAIN PORTABLE BATTERY JUMP
STARTERS AND COMPONENTS
THEREOF**

Investigation No. 337-TA-_____

**STATEMENT REGARDING THE PUBLIC INTEREST
BY COMPLAINANT THE NOCO COMPANY**

Pursuant to Commission Rule 210.8(b), 19 C.F.R. § 210.8(b), Complainant The NOCO Company (“NOCO” or “Complainant”) respectfully submits this Statement Regarding the Public Interest. NOCO seeks a general exclusion order and cease and desist orders against Proposed Respondents’ portable battery jump starters and components thereof that infringe U.S. Patent Nos. 9,007,015 (“’015 Patent) and/or 10,604,024 (“’024 Patent”), (collectively, the “Asserted Patents”) and/or the U.S. Trademark Reg. Nos. 4,811,656 (“’656 Trademark”) and/or 4,811,749 (“’749 Trademark”), (collectively, the “Asserted Trademarks”). NOCO is a family company that was founded in the United States over 100 years ago. Today, NOCO is still a leading innovator in the automotive battery industry, and designs and manufactures premium consumer battery chargers, jump starters, solar panels, and portable power devices as well as a wide range of related battery products and accessories. As discussed more fully below, the exclusion of the Proposed Respondents’ infringing products (“Accused Products”) from the United States will have no adverse effect on the public health and welfare in the United States, competitive conditions in the United States economy, the production of like or directly competitive articles in the United States, or United States consumers. In addition, the requested remedial orders further the Commission’s long-standing goal of enforcing intellectual property rights. *See, e.g., Certain Baseband Processor Chips & Chipsets, Transmitter & Receiver (Radio) Chips, Power Control Chips*, Inv. No. 337-TA-

543, USITC Pub. 4258, at 136-137 (Oct. 2011). The Commission should therefore decline to delegate consideration of public interest issues to the Administrative Law Judge (“ALJ”).

A. Use of the Accused Products in the United States

The Accused Products potentially subject to a general exclusion order and cease and desist orders are portable jump starters that are powered by lithium-ion batteries, as well as components used in operating the same, including cables. The Asserted Patents relate to the incorporation of a power switch actuated by a microcontroller such that power will be delivered from the lithium-ion power pack to terminals of the battery to be jump started only when the battery is connected to the jump starter with the proper polarity of positive and negative terminals. This invention solves the problem of sparking or potential damage to the battery and/or bodily injury when the jumper terminals or clamps of the cables are inadvertently brought in contact with each other, or when positive and negative terminals are connected to the opposite polarity terminals in the vehicle to be jumped into portable lithium-ion battery jump starters. NOCO developed these patented features and has used them continuously in its Boost® jump starters. The NOCO Boost® jump starters, as well as the Accused Products, are used by consumers to jump start batteries in a variety of vehicles, including cars, trucks, motorcycles, and boats, without requiring connection to another vehicle battery, e.g., with jumper cables.

B. There Are No Public Health, Safety, or Welfare Concerns Relating to the Requested Remedy

The issuance of the general exclusion order and cease and desist orders requested in this Investigation would not adversely affect the public health, safety, or welfare in the United States. The products at issue do not fall within the categories of products generally considered essential in the public interest sense, such as pharmaceuticals, medical equipment, or other products relating to public health, safety, or welfare. *See, e.g., Certain Fluidized Supporting Apparatus &*

Components Thereof, Inv. No. 337-TA-182/188, USITC Pub. 1667 (Oct. 1984); *Certain Air Mattress Systems, Components Thereof & Methods of Using the Same*, Inv. No. 337-TA-971, Comm'n Op. (Jun. 20, 2017). While the Accused Products are convenient and the infringing elements they contain make them more user-friendly than other vehicle jump-starting options, they are not necessary to public health and welfare as set forth in 19 C.F.R. § 1337 (d), (e), and (f) and their exclusion from the U.S. market would not raise any public health, safety, or welfare concerns. In addition, the Accused Products constitute only a fraction of the jump starter options available in the U.S. market, including comparable portable jump starters available from NOCO, its licensees, and many other manufacturers, as well as non-lithium-ion battery jump starters, or traditional jumper cables. As further explained below, sufficient alternatives to the Accused Products are available to U.S. consumers.

C. Like or Directly Competitive Articles That Could Replace the Accused Products

NOCO's Boost® line of portable jump starters includes six models (Boost® Sport™, Boost® Plus™, Boost® XL™, Boost® HD™, Boost® Pro™, and Boost® Max™) which provide a range from 500A to 20,000A for a wide variety of vehicle batteries and applications. NOCO's own products could therefore replace any size Accused Product currently offered by the Proposed Respondents.

In addition, portable jump starters by licensees or direct competitors of NOCO can also be used to replace the Accused Products. There are a number of lithium battery jump starters available in the United States that do not offer safety features claimed in the Asserted Patents. Specifically, non-infringing models are available from at least the following brands: Everstart Brand, Clore Automotive, Inc., Matco Tools, Inc., and Baccus Global, Inc.

D. NOCO and Others Have the Ability to Replace the Accused Products

NOCO is a well-established manufacturer with the capacity to increase manufacturing to meet demand. NOCO has been manufacturing and selling the Boost® line of products since 2014, and, prior to the Proposed Respondents' entry into the market, NOCO was satisfying the demand for such products. Also, as set forth above, there are a number of other brands, including those listed in the preceding paragraph, that offer non-infringing alternatives to the Accused Products. Thus, in a commercially reasonable time, NOCO and third parties have the ability to replace the volume of Accused Products that would be subject to the requested remedial orders. Furthermore, competitive conditions in the United States economy would not be adversely affected by the requested remedies: as there are multiple suppliers of portable jump starters, the U.S market will remain highly competitive. Because of the availability of a range of portable jump starters, the exclusion of the Accused Products is not likely to have a material impact on prices.

E. Requested Remedial Orders Would Not Impact Consumers

Neither the general exclusion order nor the cease and desist orders would adversely impact consumers. NOCO offers a variety of models of its Boost® portable lithium ion jump starters that would be available to consumers should the Accused Products be excluded from the United States. NOCO and/or third parties are able to meet the increase in demand that would result from the issuance of the requested remedial orders. From the consumer's perspective, there is no feature or benefit unique to any Accused Product such that it could not be replaced with a non-infringing product supplied by NOCO or a third party. Furthermore, because there are many alternatives available at a variety of price points, the exclusion of the Accused Products would not result in higher prices to consumers. The requested relief will therefore not impact consumers.

For the reasons set forth above, NOCO respectfully states that public interest factors will not affect the Commission's ability to issue remedial orders in an Investigation based on the

attached complaint and delegation of fact finding on this issue is not appropriate. The products at issue are portable jump starters that are innovative and useful for consumers, but do not implicate public health, safety, or welfare concerns, and a number of alternatives to the Accused Products will be available from NOCO and or third parties, within a reasonable time, at a comparable price. The requested remedial orders will in fact serve the public interest by protecting the intellectual property rights of a well-established U.S. company and reducing unfair competition in the United States.

Respectfully submitted,

Date: January 15, 2021

/s/ Deanna Tanner Okun_____

Deanna Tanner Okun
V. James Adduci, II
Lauren E. Peterson
Juan J. Garcia
ADDUCI, MASTRIANI & SCHAUMBERG, L.L.P.
1133 Connecticut Avenue, NW
Washington, DC 20036
Phone: (202) 467-6300
Facsimile: (202) 466-2006
Email: NOCO-001@adduci.com

Michael J. Garvin
VORYS, SATER, SEYMOUR AND PEASE L.L.P.
200 Public Square
Suite 1400
Cleveland, OH 44114-2327
Telephone: (216) 479-6100
Facsimile: (216) 479-6060
Email: mjgarvin@vorys.com

Rex W. Miller, II
VORYS, SATER, SEYMOUR AND PEASE LLP
52 East Gay Street
Columbus, OH 43215
Telephone: (614) 464-6207
Facsimile: (614) 719-4766
Email: rwmiller@vorys.com

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.**

In the Matter of

**CERTAIN PORTABLE BATTERY JUMP
STARTERS AND COMPONENTS
THEREOF**

Investigation No. 337-TA-_____

**COMPLAINT UNDER SECTION 337 OF
THE TARIFF ACT OF 1930, AS AMENDED**

COMPLAINANT

The NOCO Company
30339 Diamond Parkway #102
Glenwillow, OH 44139
United States of America
Phone: (800) 456-6626

COUNSEL FOR COMPLAINANT

Michael J. Garvin
VORYS, SATER, SEYMOUR AND PEASE LLP
200 Public Square
Suite 1400
Cleveland, OH 44114-2327
Telephone: (216) 479-6100
Facsimile: (216) 479-6060
Email: mjgarvin@vorys.com

Rex W. Miller, II
VORYS, SATER, SEYMOUR AND PEASE LLP
52 East Gay Street
Columbus, OH 43215
Telephone: (614) 464-6207
Facsimile: (614) 719-4766
Email: rwmiller@vorys.com

Deanna Tanner Okun
V. James Adduci, II
Lauren E. Peterson
Juan J. Garcia
**ADDUCI, MASTRIANI & SCHAUMBERG,
L.L.P.**

PROPOSED RESPONDENTS

Advance Auto Parts, Inc.
2635 East Millbrook Road
Raleigh, North Carolina 27604

Anker Innovations Ltd.
Room 1318-19 Hollywood Commercial
Center
610 Nathan Road, Mongkok
Kowloon, Hong Kong

Anker Technology Co., Ltd.
610 Nathan Road,
Mong Kok, Hong Kong

Anker Technology (UK) Ltd.
Suite B, Fairgate House, 205 Kings
Road, Tyseley, Birmingham, United
Kingdom B11 2AA

Antigravity Batteries LLC
15622 Broadway Center Street
Gardena, California 90248

Arteck Electronic Co., Ltd.
No. 1104-51, Tower B, Jinfengcheng
Building, Shennan East Road, No. 501,
Luohu, Shenzhen, Guangdong, China 518100

ATD Tools, Inc.
160 Enterprise Drive
Wentzville Missouri 63385

1133 Connecticut Avenue, NW
Washington, DC 20036
Phone: (202) 467-6300
Facsimile: (202) 466-2006
Email: NOCO-001@adduci.com

Autogen Technology Co., Ltd.
Building 21B No. 3021 Kaixuan Road,
Shanghai, China 200000

Aukey Technology Co., Ltd.
Room 102, Building P09
Huanancity Electronic Trading Center,
Longgang District., Shenzhen China 51800

AutoZone, Inc.
123 South Front Street
Memphis, Tennessee 38103

Baccus Global LLC
621 NW 53rd Street
Boca Raton, Florida 33487

Best Buy Co., Inc.
7601 Penn Avenue
South Richfield, MN 552423

Best Parts, Inc.
123 South Front Street
Memphis, Tennessee 38103-3607

CarAIDE USA
150 Monument Road, Suite 207
Bala Cynwyd, Pennsylvania, 19004

Chao Fung Trading Co. Ltd.
911 Jinmao Toer Mingzhou Road (W), Beilun
District, Ningbo, China (Taiwan) 315000

Circus Link, Inc.
2132 S. Grove Ave Unit N
Ontario, California 91761

Clore Automotive, LLC
8735 Rosehill Suite 220
Lenexa, Kansas 66215

Deltona U.S.A.
801 International Speedway Blvd.
DeLand, Florida 32724

Deltran USA, LLC

801 International Speedway Blvd.
DeLand, Florida 32724

Dongguan Hangchebao Energy Technology Co., Ltd.

Room 201, Changde Road No. 37, Humen Town, Dongguan City, Guangdong, China 523000

Dongguan Zhongkang Technology Electronics Co., Ltd.

No. 12 Yansha Road Tianxin, Tangxia, Tangxia Town, Dongguan City, Guangdong, China 523710

Ecoliving Pty. Ltd

17 Pearlfröst Pl
Sunnybank Hills, QLD 4109 Australia

Energen, Inc.

17008 Evergreen Place Unit B,
City of Industry, California 91745

FlyLink Tech Co., Ltd.

8F, DongMing Building, Min Zhi Street, Bao'an District, Shenzhen, Guangdong, China 518131

Gooloo Technologies LLC

Shenzhen Gooloo E-Commerce Co., Ltd.

Room 303, Bantian Business Center, Bantian Wuhe Road, Longgang District, Shenzhen, China 518000

Great Neck Global, Inc. (Taiwan)

No. 19, Lane. 96, Section. 2, Zhongshan North Road, Taipei City, Taiwan 104449
Room 1003, 96 Chung-Shan N. Road Sec. 2, Taipei City, Taiwan

Great Neck Saw Manufacturers, Inc.

165 East 2nd Street
Mineola, New York 11501

Guangdong Boltpower Energy Co., Ltd

3-6 Floor KelunTe Building, No. 5th Ganli Road, Longgang District, Shenzhen City, Guangdong, China 518100

Dongguan Boltpower Co.Ltd.
Floor 3-6, CLT Building, Buji Street, Longgang District, Shenzhen, China 518100

Hunan Boltpower New Energy Co., Ltd.
Boltpower Industrial Park, Economic & Technical Development Zone, Loudi, HuNan, China 417000

Guangdong Marshall Electric Vehicle Co., Ltd.
Lingjiang Industrial Area, Zhaoqing, Guangdong, China 526238

Guangzhou Autolion Electronic Technology Co., Ltd.
Rm. 902, No. 69, Xianlie Middle Rd., Yuexiu District, Guangzhou City, Guangdong, China 510000

Guangzhou Unique Electronics Co., Ltd.
No. 9, Jinfu Logistics Park
Baiyun Lake Street,
Baiyun District, Guangzhou City, China 510000

Hairishen Electric (Shenzhen) Co., Ltd.
Third Industrial Zone Luotian Songgang
Bao'an District, Shenzhen City, China 518105

Halo2Cloud, LLC
6 Central Row
Hartford, Connecticut 06103

Horizon Tool, Inc.
7918 Industrial Village Rd.
Greensboro, North Carolina 27409

Huizhou Grepro E-Commerce

Room 2004 B Kaibinsiji Build., Yunshanxi Rd., Huicheng District, Huizhou City, China 516000

Huizhou Roypow Technology Co., Ltd.
RoyPow Industrial Park, #27 Huifeng 6th Road, Zhongkai High-Tech District, Huizhou City, Guangdong, China 516006

Integrated Supply Network, LLC
2727 Interstate Drive
Lakeland, Florida 33805

Just Quality Battery Industries Co.
2 F Ho Pui Tsuen 38 Kwok Shui Road, Hong Kong

Just Quality Battery Industrial Co., Ltd.
Block B, Shabian Industrial Zone, Sanwei, Bao'an, Shenzhen, China 518102

K-Tool International
45255 Five Mile Road
Plymouth, Michigan 48170

Le Long Vietnam Co., Ltd.
40 Ba Chanh Thau Street, Area 2, Ben Luc Town, Ben Luc District, Long An Province, Vietnam 82000

Lowe's Companies, Inc.
1000 Lowe's Blvd.
Mooresville, North Carolina 28117

Matco Tools Corporation
4403 Allen Rd
Stow, Ohio 44224

Medcursor, Inc.
6130 W Flamingo Road, Suite 1818
Las Vegas, Nevada 89103

Mizco International, Inc.
80 Essex Avenue East

Avenel, New Jersey 07001

MonoPrice, Inc.

1 Pointe Drive, 4th Floor
Brea, California 92821

**National Automotive Parts Association,
LLC (d/b/a NAPA)**

2085 Marietta Blvd Northwest
Atlanta, GA 30318

Genuine Parts Company

2999 Wildwood Parkway
Atlanta, Georgia 30339

National Resources USA, Inc.

143 Carpenters Row
Wilmington, New Castle, Delaware 19807

Nekteck, Inc.

421 S Brookhurst Street, Suite 217
Anaheim, California 92804

Nex Digitronix LLP

Office No. 7, 2nd Floor, Sonchafa
Commercial, Kasturi Chowk, Dange Chowk
Road, Wakad, Pune, Maharashtra, India
411057

Nice Team Enterprise Limited

Flat A3-8, 5/F, Tsuen Wan Industrial
Building 59-71, Wang Lung Street, Tsuen
Wan, NT, Hong Kong

Nice Well Enterprise Limited

14/F., Chun Wo Commercial Center,
25 Wing Wo Street, Central, Hong Kong

Ningo Geostar Electronics Co., Ltd.

Room 301, 1 Building, No. 317, Guanghua
Road, High-Tech Zone, Ningbo, China 31500

Ningbo Zenon Electrical Co., Ltd.

#17 Xiaomiao Street, Zhouxiang Town
Cixi, Ningbo, China 315324

O'Reilly Automotive, Inc.
233 South Patterson Avenue
Springfield, Missouri 65802

Paris Corporation
800 Highland Drive
Westampton, New Jersey 08060

Pep Boys
3111 West Allegheny Avenue
Philadelphia, Pennsylvania 19132

PowerMax Battery (U.S.A.), Inc.
1520 S Grove Avenue
Ontario, California 91761

Prime Global Products, Inc.
2220 Airport Industrial Drive, Suite 100
Ball Ground, Georgia 30107

QVC, Inc.
1200 Wilson Drive
West Chester, PA 19380

Schumacher Power Technology Ltd.
No. 30, Century Road, Binhai County,
Yancheng, Jiangsu, China 224500

Schumacher Electric Corp.
801 E Business Center Drive
Mount Prospect, Illinois 60056

Shenzhen Aojie Technology Co., Ltd.
3rd Floor, No. 51-2, Fu'an West Road,
Pinghu Street, Longgang District, Shenzhen,
China 518111

Shenzhen BenRong Technology Co., Ltd.
2nd Floor, A1 Block, Silicon Valley Power
Guanlan Park, No. 334 Guiyue Road,
Guanlan Town, Longhua New District,
Shenzhen, China 518110

Shenzhen Carku Technology Co., Ltd.
Building A, Qixing Creative Workshop
(Dalang), Lianrun Road, Gaofeng

Community, Dalang Street, Longhua New District, Shenzhen, China 518110

MigOwatt Group LLC (Russia Agent)

Khabarovsk, Russia, Pavlovich Street, 26

Shenzhen Chic Electrics., Ltd.

2 #5 Floor, Hualangjia Industrial Zone, Kukeng Community, Guanlan Street, Longhua New District, Shenzhen, China 518110

Shenzhen Dingjiang Technology Co., Ltd. LLLC

R701G, HuafengBao'anZhigu Innovation Park, Yintian 4th Road, Xixiang Street, Bao'an District, Shenzhen, China 518000

Shenzhen Geilimei Technology Co., Ltd.

No. 136 Building P12, Dianziqu, Huanan City Pinghu Street, Longgang District, Shenzhen, China 518000

Shenzhen Gulin Power Technology Co.

Shi'Ao No. 2, Industrial Zone, Dalang, Longhua New District, Shenzhen, China 518110

Shenzhen Jiahongjing Technology Co., Ltd

B710, Block B, Zhantao Technology Building, Crossing Of Minzhi Road and Industrial East Road, Xinniu Community, Minzhi Street, Longhua District, Shenzhen, China 518000

Shenzhen Jieqi Digital Technology Co., Ltd.

406, Block 2, Jinyucheng Bldg., No. 15-1, Lane 1, Changkengqu, Yangmeishequ, Longgang Shenzhen, China 518000

Shenzhen Jieruijia Technology Co. Ltd

No. 8 Mu Dun Road, No. 1 Industrial, Zone, Lou Cun Community, Gong Ming,

Guang Ming District, China

Shenzhen Lianfatong Technology.Co., Ltd.
Room 3A-E,Ganyutong Building, Qingji
Road, Qinghu Community, Longhua Street,
Longhua New District, Shenzhen, China
518000

**Shenzhen Lianke Electron Technology Co.,
Ltd.**
5th Floor, Building 12, Taihua Wutong Island,
Intersection of Shunchang Road and
Hangkong Road, Xixiang Subdistrict, Baoan
District, China

Shenzhen Li Feng Maoyiyouxiangongsi
China Da Wan Xin Cun Dong, 38 Dong 201
Long Gang Qu Yuan Shan Jie Dao, DaKang,
Shenzhen, Guangdong, China 518000

**Shenzhen Mediatek Tong Technology Co.,
Ltd.**
Room 3A-E, Qianyu Tong Bldg.,
Qingji Rd., Longhua St., Longhua New
District, Shenzhen, China 518000

Shenzhen Moock Technology Co., Ltd.
718, Zerun Center, Bantian Street, Longgang
District, Shenzhen, Guangdong, China
518000

Shenzhen Muke Technology Co., Ltd.
5F, Bldg. 2, Yunantong, Industrial Park,
Huarong Road, Dalang, Longhua Town,
Shenzhen, China 518131

Shenzhen Pengfenghe Trading Co., Ltd.
201, N8 Building, N49 Wuhenand Road,
Jinfanghua Electricity Industrial Park, Bantian
St., Longgang, Shenzhen, China 518000

Shenzhen PuChengWeiLai Technology
5/F, Bldg 5, MinXing Industrial Zone
Minkang Road, Longhua, Shenzhen, China
518131

**Shenzhen Shi Shenai Dianshangwu
Youxian Gongsi**

P03 East 102, South China City Electronic
Trading Center, Pinghu Jiedao, Longgang
District, Shenzhen, Guangdong, China
518111

Shenzhen Take Tools Co., Ltd.

No. B714, Niulanqian Building, Minzhi
Road, Longhua District, Shenzhen,
Guangdong, China 518000

Shenzhen Topdon Technology Co., Ltd.

5th Floor, Building 12, Taihua Wutong Island,
Intersection of Shunchang Road and
Hangkong Road, Xixiang Subdistrict, Baoan
District, Guangdong, Shenzhen, China
518112

Shenzhen Valuelink E-Commerce Co., Ltd.

2nd Two-way ChangJiangPu,
Heao Community, HengGang Street Office,
Longgang District, Shenzhen China 518000

Shenzhen Vigor Power Battery Co., Ltd.

No.1 Building Northern Yongfa Industrial
Zone, Songgang Town Bao'an District,
Shenzhen, China 518130

Shenzhen Winplus Technology Co., Ltd.

RM307, Building 5, LixiangJiayaun,
Jindaotian Road, Buji,
Longgang District, Shenzhen, China 518000

Shenzhen Xinxing E-Commerce

A2901, 3rd Bldg, Chuanlinshanglin Xinsheng
Village Longgang Street, Longgang,
Shenzhen, China 518000

Shenzhen Yike Electronics Co., Ltd.

Area B, Floor 3, Building B
Waihuan Industrial Park, Tongfuyu Industrial
Zone, Shiyan Sub-District, Bao'an District
Shenzhen, Guangdong, China 518130

Sitect Instruments Co., Ltd.

Suites 908-090, Level 9, Landmark North, 39
Lung Sum Avenue, Sheung Shui, Hong Kong
999077

Smartech Products, Inc.

8700 Larkin Road, Suite B
Savage, Maryland 20763

**Smart Well International Development
Limited**

14/F., Chun Wo Commercial Center, 25 Wing
Wo Street, Central, Hong Kong

Stanley Black & Decker, Inc.

1000 Stanley Drive
New Britain, Connecticut 06053

**Stanley Black & Decker Precision
Manufacturing (Shenzhen) Co., Ltd.**

1/F, 2/F, Mezzanine, 3/F, Building C, 1-2/F,
Building B, Jiehe Industria, Shenzhen,
Guangdong, China 518108

Substanbo Innovations Technology, Ltd.

B7, 23/F, Hoover Industrial Building No. 26-
38 Kwai Cheong Road, Kwai Chung, N.T
Hong Kong

Sunlux Mfg. Co., Ltd. (Vietnam)

6 Đường số 6, Nhơn Trạch,
Đồng Nai, Vietnam

Sun Tech Ltd.

79-85 Bonham Strand,
Sheung Wan, Hong Kong

ThiEYE Technologies Co., Ltd.

Room405,4th Floor,Building B, Bantian
International Center,
Longgang District, China 518000

Tii Trading Inc.

13200 Brooks Drive Suite F
Baldwin Park, California 91707

Walmart Inc.

702 S.W. 8th Street
Bentonville, Arkansas 72716

Wal-Mart Stores, Inc.
601 North Walton Boulevard
Bentonville, Arkansas 72712

Sam's West, Inc. (d/b/a Sam's Club)
124 West Capitol Avenue
Suite 1900
Little Rock, Arkansas 72201

Sam's East, Inc. (d/b/a Sam's Club)
124 West Capitol Avenue
Suite 1900
Little Rock, Arkansas 72201

Wilmar Corporation
P.O. Box 88259
Tukwila, Washington 98138

Winplus North America, Inc.
2975 Red Hill Ave, Suite 100
Costa Mesa, California 92626

Yuyao Keen New Power Co., Ltd. LLC
No. 535 Qingshuiqiao Road, High-Tech
Zone, Nanmiao Village, Lizhou Street,
Yuyao, China 315400

Zagg Co. Rrd Gst
381 Airtech Parkway
Plainfield, Indiana 46168

**Zhejiang Quingyou Electronic Commerce
Co., Ltd.**
Room 266-270, Building 7, No. 253, Tinglan
Street, Qiaosi Street, Yuhang District,
Hangzhou, Zhejiang, China 311100

70mai Co., Ltd.
Room 2220, Building 2, No. 588, Zixing
Road, Minhang District, Shanghai, China
201100

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2	Non-Certified United States Patent No. 10,604,024 (“’024 Patent”)
3	Non-Certified U.S. Trademark Registration No. 4,811,656 (“’656 Trademark”)
4	Non-Certified U.S. Trademark Registration No. 4,811,749 (“’749 Trademark”)
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64	Product web pages, receipts, and photographs for Flylinktech products
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67	Product web pages, receipts, and photographs for Gooloo products
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108	Related Litigation - Asserted Patents
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APPENDICES

Appendix A1	Certified Prosecution History for the '015 Patent (“’015 Prosecution History”)
Appendix A2	References cited in the '015 Prosecution History
Appendix B1	Certified Prosecution History for the '024 Patent (“’024 Prosecution History”)
Appendix B2	References cited in the '024 Prosecution History
Appendix C	Certified Prosecution History for the '656 Trademark (“’656 Prosecution History”)
Appendix D	Certified Prosecution History for the '749 Trademark (“’749 Prosecution History”)

I. INTRODUCTION

1. The NOCO Company (“NOCO” or “Complainant”), a 100 plus year old company designing and creating premium battery products in the United States for the automotive industry, respectfully requests that the U.S. International Trade Commission (“Commission”) commence an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337 (“Section 337”) to remedy the unlawful importation into the United States, the sale for importation, offer for sale, and/or the sale within the United States after importation by the owner, importer, or consignee, of certain portable battery jump starters and components thereof that infringe one or more of the valid and enforceable United States patents owned by NOCO.

2. On information and belief, the Proposed Respondents, as listed in Section II.B., *supra*, are manufacturers, importers, trading companies, and retailers based in China and the United States. Respondents have engaged, and continue to engage, in unfair acts in violation of Section 337 through the unlicensed importation, sale for importation, offer for sale, and/or sale after importation into the United States of portable battery jump starters having certain safety features (“Accused Products”). Upon information and belief, the Accused Products have been imported into the United States.

3. The Accused Products infringe one or more of the Asserted Claims of United States Patent Nos. 9,007,015 and 10,604,024 (collectively, the “Asserted Patents”), which are both owned by NOCO. Pursuant to Commission Rule 210.12(a)(9)(i), copies of the ’015 Patent and the ’024 Patent, are attached to this Complaint as Exhibits 1 – 2, respectively.¹

¹ Certified copies of the Asserted Patents have been requested from the USPTO and will be filed upon receipt.

4. Certain of Respondents' Accused Products also infringe one or more of U.S. Trademark Reg. Nos. 4,811,656 and 4,811,749 (collectively, the "Asserted Trademarks"), which are both owned by NOCO, in violation of Section 337(a)(1)(C). Pursuant to Commission Rule 210.12(a)(9)(i), copies of the '656 Trademark and '749 Trademark are attached to this Complaint as Exhibits 3-4, respectively.²

5. Complainant asserts that the Accused Products infringe at least the following claims of one or more Asserted Patents in violation of Section 337(a)(1)(B)(i), either literally or under the doctrine of equivalents:

Asserted Patent	Asserted Claims ³
9,007,015	1, 4, 11, 14, 18, 19, 21
10,604,024	1, 4, 5, 6, 16, 19, 23, 24, 26, 29, 30

Table 1. The Asserted Claims

6. Pursuant to Commission Rules 210.10(b)(1) and 210.12(a)(12), Complainant states that a plain English description of the category of Accused Products is portable, battery-powered devices that are used to jump-start batteries in automobiles, trucks, and other vehicles, and related components, namely battery cables and clamps.

7. As required by Section 337(a)(2) and (3), a domestic industry exists and is well established in the United States for each of the Asserted Products and for products and technology protected by the Asserted Patents and Asserted Trademarks.

8. Complainant NOCO seeks a general exclusion order pursuant to Section 337(d)(2) excluding from entry into the United States all products that infringe one or more claims of any of

² Certified copies of the Asserted Trademarks have been requested from the USPTO and will be filed upon receipt.

³ Independent claims are in bold.

the Asserted Patents and/or are sold or advertised using the Asserted Trademarks.⁴ Complainant further seeks cease and desist orders pursuant to Section 337(f) directing Respondents and those acting in conjunction with Respondents to cease the importation, offering for sale, promotion, marketing, advertising, demonstration, and warehousing of inventory for distribution, sale, and use of such products within the United States. Complainant also seeks a bond pursuant to Section 337(j).

II. THE PARTIES

A. Complainant NOCO

9. Complainant NOCO is an Ohio corporation having its principal place of business at 30339 Diamond Parkway #102, Glenwillow, Ohio 44139.

10. NOCO is a privately held family company that was founded in the United States over 100 years ago. Joseph H. Nook, a tire and battery distributor from Cleveland, Ohio, founded The NOCO Company in 1914. Mr. Nook set out to develop a product that would prevent battery corrosion. After several hundred different formulations, Mr. Nook began commercially manufacturing and distributing the world's first Battery Corrosion Preventative which he called "NCP2," which is an acronym for "No Corrosion Product" which is applied in "2 Steps." The NCP2 brand quickly became a household name in every major battery and automotive shop. For over 100 years, the NCP2 brand has been preventing battery corrosion on over a billion vehicles and applications worldwide.

11. Today, NOCO, still owned and managed by the Nook family, remains a leading innovator in the automotive battery industry, and designs and manufactures premium consumer

⁴ Should the Commission find that a general exclusion order is not appropriate, NOCO respectfully requests that limited exclusion orders be entered against each named Respondent and its subsidiaries, predecessors, affiliates, agents, successors, and assigns.

battery chargers, jump starters, solar panels, and portable power devices as well as a wide range related battery products and accessories.

12. NOCO has all right, title, and interest in the Asserted Patents and Asserted Trademarks. *See* Exs. 6 and 7.

13. NOCO takes significant measures to protect its intellectual property rights. NOCO first began noticing the appearance of the Accused Products in the U.S. marketplace in 2014 shortly after the introduction of its Boost® products and since then has continuously endeavored to stop the entities involved. NOCO's IPR protection efforts are outlined in Section XI, *infra*.

B. Proposed Respondents

14. The sections below provide information sufficient to identify the Proposed Respondents. Additional information regarding the Proposed Respondents' unfair acts as they relate to the Accused Products can be found in Section VI below, and in the attached Confidential Declaration of Anne Hurst. *See* Ex. 7C.

1. Advance Auto Parts, Inc.

15. On information and belief, Respondent Advance Auto Part, Inc. ("Advance Auto") is a company organized and existing under the laws of the United States, having its principal place of business located at 2635 East Millbrook Road, Raleigh, North Carolina 27604.

16. On information and belief, Advance Auto is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

2. Anker Innovations Ltd.

17. On information and belief, Respondent Anker Innovations Ltd. ("Anker Innovations") is a Hong Kong company organized and existing under the laws of Hong Kong and has a principal place of business located at Room 1318-19 Hollywood Commercial Center, 610

Nathan Road, Mongkok Kowloon, Hong Kong. Anker is believed to be affiliated with Anker Technology Co., Ltd (“Anker Technology”) and Anker Technology (UK) Ltd. (“Anker Technology (UK)”).

18. On information and belief, Anker Innovations, Anker Technology, and Anker Technology (UK) are in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

3. Antigravity Batteries LLC

19. On information and belief, Respondent Antigravity Batteries LLC (“Antigravity”) is a company organized and existing under the laws of the United States, having its principal place of business located at 15622 Broadway Center Street, Gardena, California 90248.

20. On information and belief, Antigravity is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

4. Arteck Electronic Co., Ltd.

21. On information and belief, Respondent Arteck Electronic Co., Ltd. (“Arteck Electronic”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at No. 1104-51, Tower B, Jinfengcheng Building, Shennan East Road No. 501, Shenzhen, Guangdong, China 518100.

22. On information and belief, Arteck Electronic is in the business of manufacturing jump starters in China. Arteck Electronic sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

5. ATD Tools, Inc.

23. On information and belief, Respondent ATD Tools, Inc. (“ATD Tools”) is a company organized and existing under the laws of the United States, having its principal place of business located at 160 Enterprise Drive, Wentzville, Missouri 63385.

24. On information and belief, ATD Tools is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

6. Aukey Technology Co., Ltd.

25. On information and belief, Respondent Aukey Technology Ltd. (“Aukey”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at Room 102, Building P09, Huanancity Elec-Trading Center, Longgang District, Shenzhen, China.

26. On information and belief, Aukey is in the business of manufacturing jump starters in China. Aukey sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

7. Autogen Technology Co., Ltd.

27. On information and belief, Respondent Autogen Technology Co., Ltd. (“Autogen”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at Bld 21B No 3021 Kaixuan Rd, Shanghai, China.

28. On information and belief, Autogen is in the business of manufacturing jump starters in China. Autogen sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

8. AutoZone, Inc.

29. On information and belief, Respondent AutoZone, Inc. (“AutoZone”) is a company organized and existing under the laws of the United States, having its principal place of business located at 123 South Front Street, Memphis, Tennessee 38103.

30. On information and belief, AutoZone is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

9. Baccus Global LLC

31. On information and belief, Respondent Baccus Global LLC. (“Baccus Global”) is a company organized and existing under the laws of the United States and has a principal place of business located at 621 NW 53rd Street, Boca Raton, Florida 33487.

32. On information and belief, Baccus Global is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

10. Best Buy Co., Inc.

33. On information and belief, Respondent Best Buy Co., Inc. (“Best Buy”) is a company organized and existing under the laws of the United States, having its principal place of business located at 7601 Penn Avenue, South Richfield, Minnesota 552423.

34. On information and belief, Best Buy is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

11. Best Parts, Inc.

35. On information and belief, Respondent Best Parts, Inc. (“Best Parts”) is a company organized and existing under the laws of the United States, having its principal place of business located at 123 S Front Street, Memphis, Tennessee 38103-3607.

36. On information and belief, Best Parts is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

12. CarAIDE USA

37. On information and belief, Respondent CarAIDE USA (“CarAIDE USA”) is a company organized and existing under the laws of the United States, having its principal place of business located at 150 Monument Road, Suite 207, Bala Cynwyd, Pennsylvania 19004.

38. On information and belief, CarAIDE USA is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents

13. Chao Fung Trading Co. Ltd.

39. On information and belief, Respondent Chao Fung Trading Co. Ltd. (“Chao Fung Trading”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at 911 Jinmao Toer Mingzhou Road W Beilun District Ningbo, China (Taiwan).

40. On information and belief, Chao Fung Trading is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

14. Circus Link, Inc.

41. On information and belief, Respondent Circus Link, Inc. (“Circus Link”) is a company organized and existing under the laws of the United States, having its principal place of business located at 2132 S. Grove Ave, Unit N, Ontario, California 91761.

42. On information and belief, Circus Linke is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

15. Clore Automotive, LLC

43. On information and belief, Respondent Clore Automotive, LLC (“Clore Automotive”) is a company organized and existing under the laws of the United States, having its principal place of business located at 8735 Rosehill Suite 220, Lenexa, Kansas 66215.

44. On information and belief, Clore Automotive is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

16. Deltona U.S.A.

45. On information and belief, Respondent Deltona U.S.A. (“Deltona”) is a company organized and existing under the laws of the United States, having its principal place of business located at 801 International Speedway Blvd, DeLand, Florida 32724.

46. On information and belief, Deltona is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

17. Deltran USA, LLC

47. On information and belief, Respondent Deltran USA, LLC (“Deltran”) is a company organized and existing under the laws of the United States, having its principal place of business located at 801 International Speedway Blvd., DeLand, Florida 32724.

48. On information and belief, Deltran is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

18. Dongguan Hangchebao Energy Technology Co., Ltd.

49. On information and belief, Respondent Dongguan Hangchebao Energy Technology Co., Ltd. (“Hangchebao”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at Room 201, Changde Road No. 37, Humen Town Dongguan City, Guangdong, China.

50. On information and belief, Hangchebao is in the business of manufacturing jump starters in China. Hanchebao sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents and Asserted Trademarks.

19. Dongguan Zhongkang Technology Electronics Co., Ltd.

51. On information and belief, Respondent Dongguan Zhongkang Technology Electronics Co., Ltd. (“Zhongkang”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at No 12 Yansha Road Tianxin, Tangxia, Tangxia Town, Dongguan City Guangdong, China 523710.

52. On information and belief, Zhongkang is in the business of manufacturing jump starters in China. Zhongkang sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

20. Ecoliving Pty. Ltd.

53. On information and belief, Respondent Ecoliving Pty. Ltd. (“Ecoliving”) is an Australian corporation that is organized and existing under the laws of Australia and has a principal place of business located at 17 Pearlfröst Pl Sunnybank Hills, QLD 4109 Australia.

54. On information and belief, Ecoliving is in the business of business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

21. Energen, Inc.

55. On information and belief, Respondent Energen, Inc. (“Energen”) is a company organized and existing under the laws of the United States, having its principal place of business located at 17008 Evergreen Place Unit B, City of Industry, California 91745.

56. On information and belief, Energen is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

22. FlyLink Tech Technologies Co., Ltd.

57. On information and belief, Respondent FlyLink Tech Technologies Co., Ltd. (“FlyLink Tech”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at 2 Floor, 9 Building, Hengling Ind. Park Min Zhi Street, Bao’an District, Shenzhen China.

58. On information and belief, FlyLink Tech is in the business of manufacturing jump starters in China. FlyLink Tech sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

23. Gooloo Technologies LLC

59. On information and belief, Respondent Gooloo Technologies LLC (“Gooloo”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at 303 Room Bantian Business Center Bantian Wuhe Road, Longgang Dist., Shenzhen China 51800.

60. On information and belief, Gooloo is in the business of manufacturing jump starters in China. Gooloo sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

24. Great Neck Global, Inc.

61. On information and belief, Respondent Great Neck Global, Inc. (“Great Neck”) is a Taiwanese corporation that is organized and existing under the laws of Taiwan and has a principal place of business located at No. 19, Lane 96, Section 2, Zhongshan North Road, Taipei, Taiwan 104,. Great Neck is believed to be associated and/or operate under the name Great Neck Saw Manufacturers, Inc., a company organized and existing under the laws of the United States, having its principal place of business located at 165 East 2nd Street, Mineola, New York 11501.

62. On information and belief, Great Neck is in the business of manufacturing jump starters in Taiwan. Great Neck sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

25. Guangdong Boltpower Energy Co., Ltd.

63. On information and belief, Respondent Guangdong Boltpower Energy Co., Ltd. (“Boltpower”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at 3-6 Floor KelunTe Building No. 5 Ganli Road, Longgang District, Shenzhen City, Guangdong, China. Boltpower is believed to be affiliated with Dongguan Boltpower Co., Ltd. and Hunan Boltpower New Energy Co., Ltd.

64. On information and belief, Boltpower is in the business of manufacturing jump starters in China. Boltpower sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents and Asserted Trademarks.

26. Guangdong Marshall Electric Vehicle Co., Ltd.

65. On information and belief, Respondent Guangdong Marshall Electric Vehicle Co., Ltd. (“Guangdong Marshall”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at Lingjiang Industrial Area, Zhaoqing, Guangdong, China 52638. Guangdong Marshall is believed to be affiliated with Shanghai Marshall Electric Vehicle Co., Ltd. and Anhui Marshall Electric Vehicle Co. Ltd.

66. On information and belief, Guangdong Marshall is in the business of manufacturing jump starters in China. Guangdong Marshall sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

27. Guangzhou Autolion Electric Technology Co., Ltd.

67. On information and belief, Respondent Guangzhou Autolion Electronic Technology Co., Ltd. (“Autolion”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at Room 902, No. 69, Xianlie Middle Road, Yuexiu District, Guangzhou, Guangdong, China.

68. On information and belief, Autolion is in the business of manufacturing jump starters in China. Autolion sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents and Asserted Trademarks.

28. Guangzhou Unique Electronics Co., Ltd.

69. On information and belief, Respondent Guangzhou Unique Electronics Co., Ltd. (“Guangzhou Unique Electronics”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at NO. 9, Jinfu Logistics Park, Baiyun Lake Street, Baiyun District, Guangzhou, China 510000.

70. On information and belief, Guangzhou Unique Electronics is in the business of manufacturing jump starters in China. Guangzhou Unique Electronics sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents and Asserted Trademarks.

29. Hairishen Electric (Shenzhen) Co., Ltd.

71. On information and belief, Respondent Hairishen Electric (Shenzhen) Co., Ltd. (“Hairishen Electric”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at Third Industrial Zone Luotian Songgang Bao’an District Shenzhen, China 518105.

72. On information and belief, Hairishen Electric is in the business of manufacturing jump starters in China. Hairishen Electric sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

30. Halo2Cloud, LLC

73. On information and belief, Respondent Halo2Cloud, LLC (“Halo2Cloud”) is a company organized and existing under the laws of the United States, having its principal place of business located at 6 Central Row, Hartford, Connecticut 06103.

74. On information and belief, Halo2Cloud is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

31. Horizon Tool, Inc.

75. On information and belief, Respondent Horizon Tool, Inc. (“Horizon Tool”) is a company organized and existing under the laws of the United States, having its principal place of business located at 7918 Industrial Village Road, Greensboro, North Carolina 27409. Horizon Tool is believed to be affiliated with AllStart LLC and Cal-Van & Horizon Tool Inc.

76. On information and belief, Horizon Tool is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

32. Huizhou Grepro E-Commerce

77. On information and belief, Respondent Huizhou Grepro E-Commerce (“Huizhou Grepro”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at Room 2004 B Kaibinsiji Build, Yunshanxi Road, Huicheng District, Huizhou, China.

78. On information and belief, Huizhou Grepro is in the business of manufacturing jump starters in China. Huizhou Grepro sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

33. Huizhou Roypow Technology Co., Ltd.

79. On information and belief, Respondent Huizhou Roypow Technology Co. Ltd. (“Roypow”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at RoyPow Industrial Park, #27 Huifeng 6th Road, Zhongkai High-Tech Huizhou, Guangdong, China.

80. On information and belief, Roypow is in the business of manufacturing jump starters in China. Roypow sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

34. Integrated Supply Network, LLC

81. On information and belief, Integrated Supply Network, LLC (“Integrated Supply Network”) is a company organized and existing under the laws of the United States, having its principal place of business located at 2727 Interstate Drive, Lakeland, Florida 33805.

82. On information and belief, Integrated Supply Network is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

35. Just Quality Battery Industries Co., Ltd.

83. On information and belief, Respondent Just Quality Battery Industries Co., Ltd. (“Just Quality”) is a Hong Kong corporation that is organized and existing under the laws of Hong Kong and has a principal place of business located at 2 F Ho Pui Tsuen 38 Kwok Shui Road, Hong Kong.

84. On information and belief, Just Quality is in the business of manufacturing jump starters in China. Just Quality sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

36. K-Tool International

85. On information and belief, K-Tool International (“K-Tool”) is a company organized and existing under the laws of the United States, having its principal place of business located at 45255 Five Mile Road Plymouth, Michigan 48170.

86. On information and belief, K-Tool is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

37. Le Long Vietnam Co., Ltd.

87. On information and belief, Respondent Le Long Vietnam Co., Ltd. (“Le Long”) is a Vietnamese corporation that is organized and existing under the laws of Vietnam and has a principal place of business located at 40 Ba Chanh Thau Street, Area 2, Ben Luc Town, Ben Luc, Long An, Vietnam.

88. On information and belief, Le Long is in the business of manufacturing jump starters in Vietnam. Le Long sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

38. Lowe’s Companies, Inc.

89. On information and belief, Lowe’s Companies, Inc. (“Lowe’s”) is a company organized and existing under the laws of the United States, having its principal place of business located at 1000 Lowe’s Blvd. Mooresville, North Carolina.

90. On information and belief, Lowe’s is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

39. Matco Tools Corporation

91. On information and belief, Matco Tools Corporation (“Matco”) is a company organized and existing under the laws of the United States, having its principal place of business located at 4403 Allen Road Stow, Ohio 44224.

92. On information and belief, Matco is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

40. Medcursor, Inc.

93. On information and belief, Medcursor, Inc. (“Medcursor”) is a company organized and existing under the laws of the United States, having its principal place of business located at 6130 W Flamingo Road, Suite 1818, Las Vegas, Nevada 89103.

94. On information and belief, Medcursor is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

41. Mizco International, Inc.

95. On information and belief, Mizco International, Inc. (“Mizco International”) is a company organized and existing under the laws of the United States, having its principal place of business located at 80 Essex Avenue East Avenel, New Jersey 07001.

96. On information and belief, Mizco International is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

42. MonoPrice, Inc.

97. On information and belief, Mono Price, Inc. (“MonoPrice”) is a company organized and existing under the laws of the United States, having its principal place of business located at 1 Pointe Drive, 4th Floor Brea, California 92821.

98. On information and belief, MonoPrice is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

43. National Automotive Parts Association, LLC

99. On information and belief, National Automotive Parts Association, LLC (“NAPA”) is a company organized and existing under the laws of the United States, having its principal place

of business located at 2085 Marietta Blvd Northwest Atlanta, GA 30318. NAPA is believed to be affiliated with Genuine Parts Company, a company organized and existing under the Laws of the United States, having its principal place of business located at 2999 Wildwood Parkway, Atlanta, Georgia 30339.

100. On information and belief, NAPA is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

44. National Resources USA, Inc.

101. On information and belief, National Resources USA, Inc. (“National Resources”) is a company organized and existing under the laws of the United States, having its principal place of business located at 143 Carpenters Row Wilmington, New Castle, Delaware 19807.

102. On information and belief, National Resources is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

45. Nekteck, Inc.

103. On information and belief, Nekteck, Inc. (“Nekteck”) is a company organized and existing under the laws of the United States, having its principal place of business located at 421 S Brookhurst Street, Suite 127, Anaheim, California 92804.

104. On information and belief, Nekteck is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

46. Nex Digitronix LLP

105. On information and belief, Nex Digitronix LLP (“Nex Digitronix”) is a company organized and existing under the laws of India, having its principal place of business located at

Office No. 7, 2nd Floor, Sonchafa Commercial, Kasturi Chowk, Old Hinjewadi Road, Wakad, Pune, Maharashtra, India 411057.

106. On information and belief, Nex Digitronix is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

47. Nice Team Enterprise Limited

107. On information and belief, Nice Team Enterprise Limited (“Nice Team”) is a Hong Kong company organized and existing under the laws of Hong Kong, having its principal place of business located at Flat A3-8, 5/F, Tsuen Wan Industrial Building 59-71, Wang Lung Street, Tsuen Wan, NT, Hong Kong.

108. On information and belief, Nice Team is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents and Asserted Trademarks.

48. Nice Well Enterprise Limited

109. On information and belief, Nice Well Enterprise Limited (“Nice Well”) is a Hong Kong company organized and existing under the laws of Hong Kong, having its principal place of business located at 14/F., Chun Wo Commercial Centre, 25 Wing Wo Street, Central, Hong Kong.

110. On information and belief, Nice Well is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents and Asserted Trademarks.

49. Ningbo Geostar Electronics Co., Ltd.

111. On information and belief, Respondent Ningbo Geostar Electronics Co., Ltd. (“Geostar”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at Room 301, 1 Building No. 317, Guanghua Road, High-

Tech Zone, Ningbo, China. Geostar is believed to be affiliated with Ningbo Geostar Photoelectric Technology Co., Ltd. and Guangdong ASK Welding Co., Ltd.

112. On information and belief, Geostar is in the business of manufacturing jump starters in China. Geostar sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

50. Ningbo Zenon Electrical Co., Ltd.

113. On information and belief, Respondent Ningbo Zenon Electrical Co., Ltd. (“Ningbo Zenon Electrical”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at #17 Xiaomiao Street Zhouxiang Town, Cixi Ningbo, China 315324.

114. On information and belief, Ningbo Zenon Electrical is in the business of manufacturing jump starters in China. Ningbo Zenon Electrical sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

51. O’Reilly Automotive, Inc.

115. On information and belief, O’Reilly Automotive, Inc. (“O’Reilly”) is a company organized and existing under the laws of the United States, having its principal place of business located at 233 South Patterson Avenue Springfield, Missouri 65802.

116. On information and belief, O’Reilly is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

52. Paris Corporation

117. On information and belief, Paris Corporation (“Paris Corporation”) is a company organized and existing under the laws of the United States, having its principal place of business located at 800 Highland Drive Westhampton, New Jersey 08060.

118. On information and belief, Paris Corporation is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

53. Pep Boys

119. On information and belief, Pep Boys (“Pep Boys”) is a company organized and existing under the laws of the United States, having its principal place of business located at 3111 West Allegheny Avenue Philadelphia, Pennsylvania 19132.

120. On information and belief, Pep Boys is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

54. PowerMax Battery (U.S.A.), Inc.

121. On information and belief, PowerMax Battery (U.S.A.), Inc. (“PowerMax”) is a company organized and existing under the laws of the United States, having its principal place of business located at 1520 S Grove Avenue, Ontario, California 91761.

122. On information and belief, PowerMax is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

55. Prime Global Products, Inc.

123. On information and belief, Prime Global Products, Inc. (“Prime Global Products”) is a company organized and existing under the laws of the United States, having its principal place of business located at 2220 Airport Industrial Drive, Suite 100, Ball Ground, Georgia 30107.

124. On information and belief, Prime Global Products is in the business of manufacturing jump starters in China. Prime Global Products sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

56. QVC, Inc.

125. On information and belief, QVC, Inc. (“QVC”) is a company organized and existing under the laws of the United States, having its principal place of business located at 250 Dove Court Santa Paula, California 93060.

126. On information and belief, QVC is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

57. Schumacher Power Technology Ltd.

127. On information and belief, Respondent Schumacher Power Technology Ltd. (“Schumacher”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at No. 30, Century Road, Binhai County, Yancheng, Jiangsu, China, 215127. Schumacher is believed to be affiliated with Schumacher Electric Corp.

128. On information and belief, Schumacher is in the business of manufacturing jump starters in China. Schumacher sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

58. Shenzhen Aojie Technology Co. Ltd.

129. On information and belief, Respondent Shenzhen Aojie Technology Co., Ltd. (“Shenzhen Aojie”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at 3rd Floor, No. 51-2, Fu’an West Road, Pinghu Street, Longgang District, Shenzhen, China 518111.

130. On information and belief, Shenzhen Aojie is in the business of manufacturing jump starters in China. Shenzhen Aojie sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

59. Shenzhen BenRong Technology Co., Ltd.

131. On information and belief, Respondent Shenzhen BenRong Technology Co., Ltd. (“BenRong”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at 2nd Floor, A10 Block, Silicon Valley Power Fuanlan Park, No. 334 Guiyue R Guanlan Town, Longhua New District, Shenzhen, China 518110. BenRong is believed to be affiliated with GuangZhou B’R Co. Ltd.

132. On information and belief, BenRong is in the business of manufacturing jump starters in China. BenRong sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

60. Shenzhen Carku Technology Co., Ltd.

133. On information and belief, Respondent Shenzhen Carku Technology Co., Ltd. (“Carku”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at Building A, Qixing Creative Workshop (Dalang), Lianrun Road, Gaofeng Community, Dalang Street, Longhua New District, China. Carku is believed to be affiliated with MigOwatt Group LLC.

134. On information and belief, Carku is in the business of manufacturing jump starters in China. Carku sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

61. Shenzhen Chic Electrics Co., Ltd.

135. On information and belief, Respondent Shenzhen Chic Electrics., Ltd. (“Shenzhen Chic Electrics”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at 2 #5 Floor, Hualangjia Industrial Zone, Kukeng Community, Guanlan Street, Longhua New District, Shenzhen China.

136. On information and belief, Shenzhen Chic Electrics is in the business of manufacturing jump starters in China. Shenzhen Chic Electrics sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

62. Shenzhen Dingjiang Technology Co., Ltd. LLLC

137. On information and belief, Respondent Shenzhen Dingjiang Technology Co., Ltd. LLLC (“Shenzhen Dingjiang Technology”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at Room 701G, HuafengBao’anZhigu Innovation Park Yintian 4th Road, Xixiang St., Bao’an District, Shenzhen, China 518000.

138. On information and belief, Carku is in the business of manufacturing jump starters in China. Carku sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents and Asserted Trademarks.

63. Shenzhen Geilimei Technology Co., Ltd.

139. On information and belief, Respondent Shenzhen Geilimei Technology Co., Ltd. (“Shenzhen Geilimei Technology”) is a Chinese corporation that is organized and existing under

the laws of China and has a principal place of business located at No. 136 Building P12, Dianziqu, Huanan City Pinghu Street, Longgang District, Shenzhen, China.

140. On information and belief, Shenzhen Geilimei Technology is in the business of manufacturing jump starters in China. Shenzhen Geilimei Technology sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents and Asserted Trademarks.

64. Shenzhen Gulin Power Technology Co.

141. On information and belief, Respondent Shenzhen Gulin Power Technology Co. (“Gulin”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at Shi’Ao No. 2, Industrial Zone, Dalang, Longhua New District, China.

142. On information and belief, Gulin is in the business of manufacturing jump starters in China. Gulin sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

65. Shenzhen Jiahongjing Technology Co., Ltd.

143. On information and belief, Respondent Shenzhen Jiahongjing Technology Co., Ltd. (“Shenzhen Jiahongjing”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at B710, Block B, Zhantao Technology Building, Crossing of Minzhi Road and Ind. East Road, Xinniu Community, Minzhi Street, Longhua Dist., Shenzhen, Guangdong, China 0755-21053571.

144. On information and belief, Shenzhen Jiahongjing is in the business of manufacturing jump starters in China. Shenzhen Jiahongjing sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

66. Shenzhen Jieqi Digital Technology Co., Ltd.

145. On information and belief, Respondent Shenzhen Jieqi Digital Technology Co., Ltd. (“Shenzhen Jieqi Digital”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at 406, Block 2, Jinyucheng Bulding, No. 15-1, Lane 1, Changkengqu, Yangmeishequ, Longgang Shenzhen, China 518000.

146. On information and belief, Shenzhen Jieqi Digital is in the business of manufacturing jump starters in China. Shenzhen Jieqi Digital sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

67. Shenzhen Jieruijia Technology Co., Ltd.

147. On information and belief, Respondent Shenzhen Jieruijia Technology Co., Ltd. (“Shenzhen Jieruijia”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at No. 8 Mu Dun Road, No. 1 Industrial Zone, Lou Cun Community, Gong Ming, Guagn Ming District, Shenzhen City, China.

148. On information and belief, Shenzhen Jieruijia is in the business of manufacturing jump starters in China. Shenzhen Jieruijia sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

68. Shenzhen Lianfatong Technology Co., Ltd.

149. On information and belief, Respondent Shenzhen Lianfatong Technology Co., Ltd. (“Shenzhen Lianfatong”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at Room 3A-E, Ganyutong Building, Qingji Road, Qinghu Community, Longhua Street, Longhua New District, Shenzhen, Guangdong, China 518000.

150. On information and belief, Shenzhen Lianfatong is in the business of manufacturing jump starters in China. Shenzhen Lianfatong sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents and Asserted Trademarks.

69. Shenzhen Lianke Electron Technology Co., Ltd.

151. On information and belief, Respondent Shenzhen Lianke Electron Technology Co., Ltd. (“Lianke”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at 5th Floor, Building 12, Taihua Wutong Island, Intersection of Shunchang Road and Hangkong Road, Xixiang Subdistrict, Baoan District, China. Lianke is believed to be affiliated with Shenzhen Topdon Technology Co., Ltd. and Hunan Lianke Electronic Commerce Co., Ltd.

152. On information and belief, Lianke is in the business of manufacturing jump starters in China. Lianke sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents and Asserted Trademarks.

70. Shenzhen Li Feng Maoyiyouxiangongsi

153. On information and belief, Respondent Shenzhen Li Feng Maoyiyouxiangongsi (“Shenzhen Li Feng Maoyiyouxiangongsi”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at China Da Wan Xin Cun Dong, 38 Dong 201 Long Gang Qu Yuan Shan Jie Dao, DaKang, Shenzhen Guangdong, China 518000.

154. On information and belief, Shenzhen Li Feng Maoyiyouxiangongsi is in the business of manufacturing jump starters in China. Shenzhen Li Feng Maoyiyouxiangongsi sells,

offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents and Asserted Trademarks.

71. Shenzhen Mediatek Tong Technology Co., Ltd.

155. On information and belief, Respondent Shenzhen Mediatek Tong Technology Co., Ltd. (“Shenzhen Mediatek”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at Room 3A-E, Qianyu Tong Building, Qingji Road, Longhua Street, Longhua New District, Shenzhen, China.

156. On information and belief, Shenzhen Mediatek is in the business of manufacturing jump starters in China. Shenzhen Mediatek sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents and Asserted Trademarks.

72. Shenzhen Moock Technology Co., Ltd.

157. On information and belief, Respondent Shenzhen Moock Technology Co., Ltd. (“Shenzhen Moock”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at 718, Zerun Center, Bantian Street, Longgang District, Shenzhen, Guangdong, China.

158. On information and belief, Shenzhen Moock is in the business of manufacturing jump starters in China. Shenzhen Moock sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

73. Shenzhen Muke Technology Co., Ltd.

159. On information and belief, Respondent Shenzhen Muke Technology Co., Ltd. (“Shenzhen Muke Technology”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at 5F, Building 2, Yunantong, Industrial Park, Huarong Road, Dlang, Longhua Town.

160. On information and belief, Shenzhen Muke Technology is in the business of manufacturing jump starters in China. Shenzhen Muke Technology sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

74. Shenzhen Pengfenghe Trading Co., Ltd.

161. On information and belief, Respondent Shenzhen Pngfenghe Trading Co., Ltd. (“Shenzhen Pengfenghe”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at 201, N8 Bulding, N49 Wuhenan Road, Jinfanghua Electricity Industrial Park, Bantian St. Longgang, Shenzhen, China 518000.

162. On information and belief, Shenzhen Pengfenghe is in the business of manufacturing jump starters in China. Shenzhen Penfenghe offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

75. Shenzhen PuChengWeiLai Technology Co., Ltd.

163. On information and belief, Respondent Shenzhen PuChengWeiLai Technology Co., Ltd. (“Shenzhen PuChengWeiLai Technology”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at 5/F, Building 5, MinXing Industrial Zone Minkang Road, Longua, Shenzhen, China 518131.

164. On information and belief, Shenzhen PuChengWeiLai Technology is in the business of manufacturing jump starters in China. Shenzhen PuChengWeiLai Technology sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

76. Shenzhen Shi Shenai Dianshangwu Youxian Gongsi

165. On information and belief, Respondent Shenzhen Shi Shenai Dianshangwu Youxian Gongsi (“Shenzhen Shi Shenai”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at P03 East 102, South China City Electronic Trading Center, Pinghu Jiedao, Longgang District, Shenzhen, Guangdong, China 518111.

166. On information and belief, Shenzhen Shi Shenai is in the business of manufacturing jump starters in China. Shenzhen Shi Shenai sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents and Asserted Trademarks.

77. Shenzhen Take Tools Co., Ltd.

167. On information and belief, Respondent Shenzhen Take Tools Co., Ltd. (“Shenzhen Take Tools”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at No. B714, Niulanqian Building, Minzhi Road, Longhua District, Shenzhen, Guangdong, China 518000.

168. On information and belief, Shenzhen Take Tools is in the business of manufacturing jump starters in China. Shenzhen Take Tools sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

78. Shenzhen Topdon Technology Co., Ltd.

169. On information and belief, Respondent Shenzhen Topdon Technology Co., Ltd. (“Shenzhen Topdon”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at 5th Floor, Building 12, Taihua Wutong

Island, Intersection of Shunchang Road and Hangkong Road, Xixiang Subdistrict, Baoan District, Guangdong, Shenzhen, China 518112.

170. On information and belief, Shenzhen Topdon is in the business of manufacturing jump starters in China. Shenzhen Topdon sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents and Asserted Trademarks.

79. Shenzhen Valuelink E-Commerce Co., Ltd.

171. On information and belief, Respondent Shenzhen Valuelink E-Commerce Co., Ltd. (“Shenzhen Valuelink”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at 2nd Two-way ChangJiangPu, Heao Community, HengGang Street Office, Longgang District, Shenzhen, China 518000.

172. On information and belief, Shenzhen Valuelink is in the business of manufacturing jump starters in China. Shenzhen Valuelink sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

80. Shenzhen Vigor Power Battery Co., Ltd.

173. On information and belief, Respondent Shenzhen Vigor Battery Co., Ltd. (“Shenzhen Vigor Power Battery”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at No.1 Building Northern Yongfa Industrial Zone, Songgang Town Bao’an District, Shenzhen, China.

174. On information and belief, Shenzhen Vigor Power Battery is in the business of manufacturing jump starters in China. Shenzhen Vigor Power Battery sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

81. Shenzhen Winplus Technology Co., Ltd.

175. On information and belief, Respondent Shenzhen Winplus Technology Co., Ltd. (“Shenzhen Winplus”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at Room 307, Building 5, LixiangJiayaun, Jindaotian Road, Buji, Longgang District, Shenzhen, China 518000. Shenzhen Winplus is believed to be affiliated with Winplus Technology (Hk) Ltd., a Hong Kong company organized and existing under the laws of Hong Kong with a principal place of business located at Flat/Room 1103 11F, Hang Seng Mongkok Building, 677 Nathan Road, Mongkok, Hong Kong.

176. On information and belief, Shenzhen Winplus is in the business of manufacturing jump starters in China. Shenzhen Winplus Battery sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

82. Shenzhen Xinxing E-Commerce Co., Ltd.

177. On information and belief, Respondent Shenzhen Xinxing E-Commerce Co., Ltd. (“Shenzhen Xinxing”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at A2901, 3rd Chuanlinshanglin Xincheng Village Longgang Street, Longgang, Shenzhen, China 518000.

178. On information and belief, Shenzhen Xinxing is in the business of manufacturing jump starters in China. Shenzhen Xinxing sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents and Asserted Trademarks.

83. Shenzhen Yike Electronics Co., Ltd.

179. On information and belief, Respondent Shenzhen Yike Electronics Co., Ltd. (“Shenzhen Yike Electronics”) is a Chinese corporation that is organized and existing under the

laws of China and has a principal place of business located at Area B, Floor 3, Building B, Waihuan Industrial Park, Tongfuyu Industrial Zone, Shiyan Sub-District, Baoan District, Shenzhen, China 518130.

180. On information and belief, Shenzhen Yike Electronics is in the business of manufacturing jump starters in China. Shenzhen Yike Electronics sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

84. Sitect Instruments Co., Ltd.

181. On information and belief, Respondent Sitect Instruments Co., Ltd. (“Sitect Instruments”) is a Hong Kong corporation that is organized and existing under the laws of Hong Kong and has a principal place of business located at Suites 908-090, Level 9, Landmark North, 39 Lung Sum Avenue, Sheung Shui, Hong Kong 999077.

182. On information and belief, Sitect Instruments is in the business of manufacturing jump starters in Hong Kong. Sitect Instruments sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

85. Smartech Products, Inc.

183. On information and belief, Smartech Products, Inc. (“Smartech”) is a company organized and existing under the laws of the United States, having its principal place of business located at 8700 Larkin Road, Suite B, Savage, Maryland 20763.

184. On information and belief, Smartech is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

86. Smart Well Enterprise Limited

185. On information and belief, Smart Well Enterprise Limited (“Smart Well”) is a Hong Kong company organized and existing under the laws of Hong Kong, having its principal place of business located at 14/F., Chun Wo Commercial Centre, 25 Wing Wo Street, Central, Hong Kong.

186. On information and belief, Smart Well is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents and Asserted Trademarks.

87. Stanley Black & Decker, Inc.

187. On information and belief, Stanley Black & Decker, Inc. (“Stanley Black & Decker”) is a company organized under the laws of the United States, having its principal place of business located at 1000 Stanley Drive, New Britain, Connecticut 06053.

188. On information and belief, Stanley Black & Decker is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

88. Stanley Black & Decker Precision Manufacturing (Shenzhen) Co., Ltd.

189. On information and belief, Stanley Black & Decker Precision Manufacturing (Shenzhen) Co., Ltd. (“Stanley Black & Decker (Shenzhen)”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at 1/F, 2/F, Mezzanine, 3/F, Building C., 1-2/F, Building B, Jiehe Industria, Shenzhen, Guangdong, China 518108.

190. On information and belief, Stanley Black & Decker (Shenzhen) is in the business of manufacturing jump starters in China. Stanley Black & Decker (Shenzhen) sells, offers for sale,

imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

89. Substanbo Innovations Technology, Ltd.

191. On information and belief, Respondent Substanbo Innovations Technology, Ltd. (“Substanbo Innovations”) is a Hong Kong corporation that is organized and existing under the laws of Hong Kong and has a principal place of business located at B7, 23/F, Hoover Industrial Building No. 26-38 Kwai Cheong Road, Kwai Chung, N.T Hong Kong.

192. On information and belief, Substanbo Innovations is in the business of manufacturing jump starters in Hong Kong. Substanbo Innovations sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

90. Sunlux Manufacturing Co., Ltd.

193. On information and belief, Respondent Sunlux Manufacturing Co., Ltd. (“Sunlux”) is a Vietnamese corporation that is organized and existing under the laws of Vietnam and has a principal place of business located at 6 Đường số 6, Nhơn Trạch, Đồng Nai, Vietnam.

194. On information and belief, Sunlux is in the business of manufacturing jump starters in Vietnam. Sunlux sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

91. Sun Tech Ltd.

195. On information and belief, Respondent Sun Tech Ltd. (“Sun Tech”) is a Hong Kong corporation that is organized and existing under the laws of Hong Kong and has a principal place of business located at 79-85 Bonham Strand, Sheung Wan, Hong Kong.

196. On information and belief, Sun Tech is in the business of manufacturing jump starters in Hong Kong. Sun Tech sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

92. ThiEYE Technologies Co., Ltd.

197. On information and belief, Respondent ThiEye Technologies Co., Ltd. (“ThiEye Technologies”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at Room 405, 4th Floor, Building B, Bantian International Center, Longgang District, China.

198. On information and belief, ThiEye Technologies is in the business of manufacturing jump starters in China. ThiEye Technologies sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

93. Tii Trading Inc.

199. On information and belief, Tii Trading Inc. (“Tii Trading”) is a company organized and existing under the laws of the United States, having its principal place of business located at 13200 Brooks Drive, Suite F, Baldwin Park, California 91706.

200. On information and belief, Tii Trading is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

94. Walmart Inc.

201. On information and belief, Walmart Inc. (“Walmart”) is a company organized and existing under the laws of the United States, having its principal place of business located at 702 S.W. 8th Street, Bentonville, Arkansas 72716. Walmart is believed to be affiliated with Wal-Mart Stores, Inc.; Sam’s West, Inc (d/b/a Sam’s Club); and Sam’s East, Inc. (d/b/a Sam’s Club).

202. On information and belief, Walmart is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

95. Wilmar Corporation

203. On information and belief, Wilmar Corporation (“Wilmar”) is a company organized and existing under the laws of the United States, having its principal place of business located at P.O. Box 88259 Tukwila, Washington 98138.

204. On information and belief, Wilmar is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

96. Winplus North America, Inc.

205. On information and belief, Winplus North America, Inc. (“Winplus North America”) is a company organized and existing under the laws of the United States, having its principal place of business located at 2975 Red Hill Ave, Suite 100, Costa Mesa, California 92626.

206. On information and belief, Winplus is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

97. Yuyao Keen New Power Co., Ltd. LLC

207. On information and belief, Respondent Yuyao Keen New Power Co., Ltd. LLC (“Yuyao”) is a Chinese corporation that is organized and existing under the laws of China and has a principal place of business located at No. 535 Qingshuiqiao Road, High-Tech Zone, Nanmiao Village, Lizhou Street, Yuyao, China.

208. On information and belief, Yuyao is in the business of manufacturing jump starters in China. Yuyao sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

98. Zagg Co. Rrd Gst

209. On information and belief, Zagg Co. Rrd Gst (“Zagg”) is a company organized and existing under the laws of the United States, having its principal place of business located at 381 Airtech Parkway, Plainfield, Indiana 46168. Zagg is believed to be affiliated with Zagg, Inc., a company organized and existing under the laws of the United States, having its principal place of business located at 910 West Legacy Center Way, Suite 500, Midvale, Utah 84047.

210. On information and belief, Zagg is in the business of importing and/or selling within the United States after importation, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

99. Zhejiang Qingyou Electronic Commerce Co., Ltd.

211. On information and belief, Zhejiang Qingyou Electronic Commerce Co., Ltd. (“Zhejiang Qingyou Electronic”) is a company organized and existing under the laws of the United States, having its principal place of business located at Room 266-270, Building 7, No. 253, Tinglan Street, Qiaosi Street, Yuhang District, Hangzhou, Zhejiang, China.

212. On information and belief, Zhejiang Qingyou Electronic is in the business of manufacturing jump starters in China. Zhejiang Qingyou Electronic sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

100. 70mai Co., Ltd.

213. On information and belief, 70mai Co., Ltd. (“70mai”) is a company organized and existing under the laws of the United States, having its principal place of business located at Room 2220, Building 2, No. 588, Zixing Road, Minhang District, Shanghai, China.

214. On information and belief, 70mai is in the business of manufacturing jump starters in China. 70mai sells, offers for sale, imports, and/or has imported into the United States, inter alia, jump starters that infringe one or more claims of the Asserted Patents.

III. THE PRODUCTS AT ISSUE

215. The products at issue are portable battery jump starter packs that allow users to safely jump start cars, boats, motorcycles, and more without connecting to another vehicle. The Accused Products and components thereof in this matter include safety features claimed by Complainant’s Asserted Patents that prevent injury to the user and damage to the battery being jump started.

216. Since the early days of automobiles, the prevalent method to recharge a dead car battery has been through the use of “jumper cables,” where two cables are run from a live battery in a running vehicle to a dead battery of a second vehicle. The many problems associated with jumper cables are well known, including the fact that a second car with a live battery is needed to perform a jump start, and the danger of sparking and short circuits, especially when the cables from the live battery to the dead battery are misconnected (referred to as “reverse polarity”) or not fully connected.

217. Numerous efforts to improve the jump-starting process have been undertaken over the years, most of which have had significant deficiencies such as lack of portability or failure to solve safety problems and did not achieve significant popularity.

218. The advent of lithium-ion batteries has permitted the introduction of compact jump starters that do not require the use of a second vehicle, providing consumer convenience as well as certain safety advantages over prior jump-starting devices.

A. Complainant’s Jump Starters

219. NOCO has successfully developed innovative automobile battery products in the United States for over 100 years. In 2014, NOCO introduced the Boost® lithium jump starter, which incorporates the patented safety features described herein.⁵ A photograph of one model of NOCO’s Boost® jumping a dead battery is shown below, and a video demonstrating how the Boost® operates can be found at <https://www.youtube.com/watch?v=QULcgAZUs0Y>



Fig. 1- NOCO Boost® Pro™ (GB150)- 3,000A Jump Starter

⁵ These products were initially called “Genius Boost®” but regardless of label, the products are the same. NOCO first released “Boost®” products without the “Genius” on Amazon on January 16, 2019, starting with the GB50 model. Though NOCO has moved away from the “Genius Boost®” name in interfacing and marketing, some products still bear this name, e.g., the GB150 still has “NOCO Genius” on the bottom overmold. NOCO is phasing out the name “Genius” entirely in its 2021 line.

220. NOCO currently offers a range of products for the charging, jump-starting, and storage of vehicle batteries. The products at issue here include the entire line of NOCO Boost® jump starters, namely, the Boost® Sport™, Boost® Plus™, Boost® XL™, Boost® HD™, Boost® Pro™, and Boost® Max™. *See* Ex. 8.

221. The NOCO Boost® jump starters are ultra-portable, lightweight, and compact. They outperform traditional lead-acid battery booster packs at a fraction of the size and weight. The Boost® jump starters provide users a safe and easy-to-use car battery jump starter pack without the worry of incorrect connections or sparks. Boost® jump starters safely connect to any 12-volt vehicle battery due to NOCO’s mistake-proof design featuring spark-proof technology and reverse polarity protection. All Boost® jump starters also feature a 2.1A USB output port to power any USB device, and an LED flashlight with 7 light modes, including SOS and Emergency Strobe. *See* Ex. 8. NOCO offers six Boost® models, which provide a range from 500A to 20,000A for a wide variety of vehicle batteries and applications.

222. Since its introduction, the Boost® has become known for its safety, ease of use, and reliability, among other features. As a result, the Boost® has enjoyed tremendous popularity, becoming one of the, if not the, market-leading compact lithium jump starters in the United States.

B. Respondents’ Jump Starters

223. On information and belief, the Accused Products include portable battery jump starters that are manufactured in China and then imported into the United States. These products incorporate the patented technology claimed in the Asserted Patents. Examples of infringing jump starter models offered by three of the Respondents are shown below:

Gooloo GP1500	Tacklife T8 Max	DB Power DJS50
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Fig. 2- Examples of Accused Products

224. It is often difficult to determine the source of the Accused Products, as the Chinese manufacturers of these products frequently distribute them through several entities, even when the products are made in the same facility. There have also been instances of the Chinese manufacturers changing their names or using trading companies to ship the products to the United States. For these reasons, there are many instances in which neither the shipping documents nor the product packaging indicate the manufacturer of the product.

225. Respondents target customers in the United States through their own websites and also sell the accused jump starters via online marketplaces, including Amazon. Numerous Respondents' Accused Products are also sold in brick-and-mortar retail locations in the United States and/or on the websites of these retailers.

IV. THE ASSERTED PATENTS

226. The Asserted Patents generally relate to portable battery jump starters and safety features contained therein. These jump starters can be used to jump start the batteries of many vehicles including cars, trucks, boats, and motorcycles.

227. The identification, ownership, non-technical description, foreign counterparts, and licensees for each Asserted Patent are identified below.

A. U.S. Patent No. 9,007,015

1. Identification of the Patent and Ownership

228. The '015 Patent, titled "Portable Vehicle Battery Jump Start Apparatus with Safety Protection" issued on April 15, 2015, naming Jonathan L. Nook, William K. Nook, James R. Stanfield, and Derek M. Underhill as the inventors. Ex. 1 (Certified copy of '015 Patent) at 1. The '015 Patent is based on U.S. Patent Application No. 14/325,938 filed on July 8, 2014. *Id.* The '015 Patent is a continuation of Application No. PCT/US2014/045343, filed on July 3, 2014. The '015 Patent will expire on July 3, 2034.

229. This Complaint is accompanied by a certified copy of the prosecution history for the '015 Patent and the references cited therein. *See* Appx. A1 and A2.

230. NOCO owns by assignment all rights, title, and interest in the '015 Patent. *See* Ex. 6.

2. Non-Technical Description of the Patent

231. The '015 Patent relates to an improved portable jump starter incorporating a rechargeable lithium-ion battery and a microcontroller. The '015 Patent describes a novel method that incorporates a power switch actuated by a microcontroller such that power will be delivered from the lithium-ion power pack to the output port only when the battery is connected to the output port and only when the battery is connected with the proper polarity of positive and negative terminals. This solves the problem of sparking or potential damage to the battery and/or bodily injury when the jumper terminals or clamps of the cables were inadvertently brought in contact with each other, or when positive and negative terminals were connected to the opposite polarity terminals in the vehicle to be jumped.

232. The '015 Patent has 23 claims, 1 of which is an independent claim. Complainant is asserting claims 1, 4, 11, 14, 18, 19 and 21.

3. Foreign Counterparts of the Patent

233. The following is a list of current foreign patents and foreign applications that are presently understood to correspond or otherwise relate to the '015 Patent:

- CA2,916,782 (Canada)
- GB2527858 (United Kingdom)
- DE10204114997B4 (Germany)
- (Australia) Patent Application (Approved) No. 20201223
- (Germany) Patent Application No. 102014020005.1
- (Germany) Patent Application No. 102014020004.3

234. NOCO owns all right, title, and interest in and to each of these foreign patents and applications, there are no other foreign patents corresponding to the '015 Patent, and there are no other pending, rejected, or abandoned foreign patent applications corresponding to the '015 Patent.

4. Licensees to the Patent

235. All licensees to the '015 Patent are identified in Confidential Ex. 5C. There are no other licensees relating to the '015 Patent.

B. U.S. Patent No. 10,604,024

1. Identification of the Patent and Ownership

236. The '024 Patent, titled "Portable Vehicle Battery Jump Start Apparatus with Safety Protection" issued on March 31, 2020 naming Jonathan L. Nook, William K. Nook, James R. Stanfield, and Derek M. Underhill as the inventors. Ex. 2 (Certified copy of '024 Patent) at 1. The '024 Patent is based on U.S. Patent Application No. 15/691,884 filed on Aug. 31, 2017. *Id.* The '024 Patent is a continuation of Application No. 14/619,655, filed February 11, 2015, now U.S. Patent No. 9,770,992, which claims priority to PCT/US2014/045434, filed July 3, 2014. The '024 Patent will expire on July 3, 2034.

237. This Complaint is accompanied by a certified copy of the prosecution history for the '024 Patent and the references cited therein. *See* Appx. B1 and B2.

238. NOCO owns by assignment all rights, title, and interest in the '024 Patent. See Ex. 7.

2. Non-Technical Description of the Patent

239. The '024 Patent relates to an improved portable jump starter incorporating a rechargeable lithium-ion battery and a microcontroller. The '024 Patent is a continuation of the '015 Patent but claims inventive features not claimed in that patent, including: the device being turned on when the microcontroller receives *simultaneous* signals from the sensors indicating that the device's battery clamps are connected to the vehicle battery proper polarity; and the device being *turned off* when the microcontroller receives signals from the sensors indicating that the device's battery clamps have become disconnected from the vehicle battery and/or an improper polarity condition.

240. The '024 Patent has 30 claims, 3 of which are independent claims. Complainant is asserting claims 1, 4, 5, 6, 16, 19, 23, 24, 26, 29, 30.

3. Foreign Counterparts of the Patent

241. *See* Section IV.A.3, *supra*.

4. Licensees to the Patent

242. All licensees to the '024 Patent are identified in Confidential Ex. 5C. There are no other licensees relating to the '024 Patent.

V. THE ASSERTED TRADEMARKS

A. U.S. Trademark Reg. No. 4,811,656

243. The federal registration of the ULTRASAFE mark, Reg. No. 4,811,656, issued on September 15, 2015 to NOCO. NOCO has continuously used this mark in commerce since at least

August 2014 for its jump starters (Classes 021 023, 026, 036, and 038.). Affidavits have been filed pursuant to Section 8 and 15 of the Lanham Act, 15 U.S.C. §§ 1058 and 1065, and this registration is incontestable. A copy of the Certificate of Registration for the Registered Trademark is attached hereto as Exhibit 3.

244. Pursuant to Commission Rule 210.12(d), NOCO will file a certified copy of the prosecution history of the ULTRASAFE trademark for U.S. Trademark Reg. No. 4,811,656, as Appendix C.⁶

B. U.S. Trademark Reg. No. 4,811,749

245. The federal registration of the SAFELY JUMP START A DEAD BATTERY IN SECONDS mark, Reg. No. 4,811,749, issued on September 15, 2015 to NOCO. NOCO has continuously used this mark in commerce since at least August 2014 for its jump starters (Classes 021, 023, 026, 036, 038, 100, 101, and 102). Affidavits have been filed pursuant to Section 8 and 15 of the Lanham Act, 15 U.S.C. §§ 1058 and 1065, and this registration is incontestable. A copy of the Certificate of Registration for the Registered Trademark is attached hereto as Exhibit 4.

246. Pursuant to Commission Rule 210.12(d), NOCO will file a certified copy of the prosecution history of the "Safely Jump Start a Dead Battery in Seconds" trademark for U.S. Trademark Reg. No. 4,811,749, as Appendix D.⁷

⁶ Certified registration and file history for the '656 Trademark have been requested from the USPTO and will be filed upon receipt.

⁷ Certified registration and file history for the '749 Trademark have been requested from the USPTO and will be filed upon receipt.

VI. UNFAIR ACTS OF THE PROPOSED RESPONDENTS

A. Infringement of the Asserted Patents

247. On information and belief, Respondents, without authorization, have been and still are infringing each of the Asserted Patents in the United States. Respondents’ unlawful and unfair acts include the importation into the United States, sale for importation into the United States, or sale within the United States after importation of the infringing Accused Products. Respondents have violated, and continue to violate, Section 337 of the Tariff Act of 1930 in view of U.S. patent laws. Respondents are not licensed under the Asserted Patents.

248. Specifically, NOCO asserts that the Respondents directly infringe, literally or under the doctrine of equivalents, at least the following independent claims of the Asserted Patents, in violation of 35 U.S.C. §§ 271(a), and/or (c) and Section 337 (a)(1)(B)(i):

Design	'015 Patent	'024 Patent
Design 01	1	1, 29, 30
Design 02	1	1, 29, 30
Design 03	1	1, 29, 30
Design 04	1	1, 29, 30
Design 05	1	1, 29, 30
Design 06	1	1, 29, 30
Design 07	1	1, 29, 30
Design 08	1	
Design 09	1	
Design 10	1	1, 29, 30
Design 11	1	1, 29, 30
Design 12	1	1, 29, 30
Design 13	1	1, 29, 30
Design 14	1	1, 29, 30
Design 15	1	1, 29, 30
Design 16	1	1, 29, 30

Table 2. Asserted Independent Claims Infringed by Proposed Respondents

249. For purposes of assessing infringement, the Accused Products are divided into groups based on similarity of the product design. The design groups are designated Design 01 through Design 16, and the Accused Products within each design group are set forth on Exhibit 9.

The Accused Products within each design group share a common design, at least with respect to the portions relevant to the infringement analysis of the independent claims of the '015 and '024 Patent claims. Each of the Respondents imports, sells for importation, and/or sells within the United States after importation at least one of the Accused Products and therefore directly infringes, literally or under the doctrine of equivalents, one or more of claims 1, 4, 11, 14, 18, 19, 21 of the '015 Patent and/or one or more of claims 1, 4, 5, 6, 16, 19, 23, 24, 26, 29, 30 of the '024 Patent with respect to such Respondent's Accused Products.

1. Design 01 Accused Products

a) Design 01

250. The Design 01 Accused Products are lithium battery powered jump starters having cable assembly that includes a relay and two sensors. The first sensor, which is the claimed vehicle battery isolation sensor, is a resistive divider sensor. The second sensor, which is the claimed reverse polarity sensor, is an optocoupler sensor. The Design 01 Accused Products are offered by numerous sellers under multiple brand names. On information and belief, the Design 01 Accused Products are manufactured by at least Respondents Carku and Bolt Power. The BEATIT D11 model jump starter is representative of the Design 01 Accused Products.

b) Infringement of the '015 Patent

251. On information and belief, select Respondents import, sell for importation, and/or sell within the United States after importation the Design 01 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claim 1 of the '015 Patent. Certain of the Design 01 Accused Products also infringe one or more of dependent claims 10, 11, 14, 18, 19 and 21 of the '015 Patent. The Design 01 Accused Products satisfy all asserted claim limitations of the '015 Patent at the time of importation into the United States.

252. A claim chart comparing independent claim 1 of the '015 Patent to the representative Design 01 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 11.

c) Infringement of the '024 Patent

253. On information and belief, select Respondents import, sell for importation, and/or sell within the United States after importation the Design 01 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claims 1, 29 and 30 of the '024 Patent. Certain of the Design 01 Accused Products also infringe one or more of dependent claims 4, 5, 6, 16, 19, 23, 24, and 26 of the '024 Patent. The Design 01 Accused Products satisfy all asserted claim limitations of the '024 Patent at the time of importation into the United States.

254. A claim chart comparing independent claims 1, 29, and 30 of the '024 Patent to the representative Design 01 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 11.

2. Design 02 Accused Products

a) Design 02

255. The Design 02 Accused Products are lithium battery powered jump starters that includes a relay and two sensors within the main body of the jump starter. The first sensor, which is the claimed vehicle battery isolation sensor, is a resistive divider sensor. The second sensor, which is the claimed reverse polarity sensor, is an optocoupler sensor. The Design 02 Accused Products are offered by numerous sellers under multiple brand names. The BEATIT BP101 model jump starter is representative of the Design 02 Accused Products.

b) Infringement of the '015 Patent

256. On information and belief, select Respondents import, sell for importation, and/or sell within the United States after importation the Design 02 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claim 1 of the '015 Patent. Certain of the Design 02 Accused Products also infringe one or more of dependent claims 10, 11, 14, 18, 19 and 21 of the '015 Patent. The Design 02 Accused Products satisfy all asserted claim limitations of the '015 Patent at the time of importation into the United States.

257. A claim chart comparing independent claim 1 of the '015 Patent to the representative Design 02 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 12.

c) Infringement of the '024 Patent

258. On information and belief, select Respondents import, sell for importation, and/or sell within the United States after importation the Design 02 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claims 1, 29 and 30 of the '024 Patent. Certain of the Design 02 Accused Products also infringe one or more of dependent claims 4, 5, 6, 16, 19, 23, 24, and 26 of the '024 Patent. The Design 02 Accused Products satisfy all asserted claim limitations of the '024 Patent at the time of importation into the United States.

259. A claim chart comparing independent claims 1, 29, and 30 of the '024 Patent to the representative Design 02 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 12.

3. Design 03 Accused Products

a) Design 03

260. The Design 03 Accused Products are lithium battery powered jump starters having a cable assembly that includes a relay and two sensors. The first sensor, which is the claimed vehicle battery isolation sensor, is a resistive divider sensor. The second sensor, which is the claimed reverse polarity sensor, is also a separate resistive divider sensor. The Design 03 Accused Products are offered by numerous sellers under multiple brand names. On information and belief, the Design 03 Accused Products are manufactured by Respondent Bolt Power. The LEMSIR V1 model jump starter is representative of the Design 03 Accused Products.

b) Infringement of the '015 Patent

261. On information and belief, select Respondents import, sell for importation, and/or sell within the United States after importation the Design 03 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claim 1 of the '015 Patent. Certain of the Design 02 Accused Products also infringe one or more of dependent claims 10, 11, 14, 18, 19 and 21 of the '015 Patent. The Design 03 Accused Products satisfy all asserted claim limitations of the '015 Patent at the time of importation into the United States.

262. A claim chart comparing independent claim 1 of the '015 Patent to the representative Design 03 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 13.

c) Infringement of the '024 Patent

263. On information and belief, select Respondents import, sell for importation, and/or sell within the United States after importation the Design 03 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claims 1, 29 and 30 of the '024 Patent. Certain of the Design 03 Accused Products also infringe one or more of

dependent claims 4, 5, 6, 16, 19, 23, 24, and 26 of the '024 Patent. The Design 03 Accused Products satisfy all asserted claim limitations of the '024 Patent at the time of importation into the United States.

264. A claim chart comparing independent claims 1, 29, and 30 of the '024 Patent to the representative Design 03 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 13.

4. Design 04 Accused Products

a) Design 04

265. The Design 04 Accused Products are lithium battery powered jump starters having a cable assembly that includes a relay and two sensors. The first sensor, which is the claimed vehicle battery isolation sensor, is a pulsing circuit that indicates the presence or absence of a vehicle battery. The second sensor, which is the claimed reverse polarity sensor, is a resistive divider sensor. The Design 04 Accused Products are offered by numerous sellers under multiple brand names. On information and belief, the Design 04 Accused Products are manufactured by Respondent Bolt Power. The Beatit D10 Pro model jump starter is representative of the Design 04 Accused Products.

b) Infringement of the '015 Patent

266. On information and belief, select Respondents import, sell for importation, and/or sell within the United States after importation the Design 04 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claim 1 of the '015 Patent. Certain of the Design 02 Accused Products also infringe one or more of dependent claims 10, 11, 14, 18, 19 and 21 of the '015 Patent. The Design 04 Accused Products satisfy all asserted claim limitations of the '015 Patent at the time of importation into the United States.

267. A claim chart comparing independent claim 1 of the '015 Patent to the representative Design 04 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 14.

c) Infringement of the '024 Patent

268. On information and belief, select Respondents import, sell for importation, and/or sell within the United States after importation the Design 04 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claims 1, 29 and 30 of the '024 Patent. Certain of the Design 04 Accused Products also infringe one or more of dependent claims 4, 5, 6, 16, 19, 23, 24, and 26 of the '024 Patent. The Design 04 Accused Products satisfy all asserted claim limitations of the '024 Patent at the time of importation into the United States.

269. A claim chart comparing independent claims 1, 29, and 30 of the '024 Patent to the representative Design 04 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 14.

5. Design 05 Accused Products

a) Design 05

270. The Design 05 Accused Products are lithium battery powered jump starters offered under the SMARTECH brand and have a cable assembly that includes a relay and two sensors. The first sensor, which is the claimed vehicle battery isolation sensor, is a resistive divider sensor. The second sensor, which is the claimed reverse polarity sensor, is an operational amplifier sensor. The SMARTECH JS-10000 model jump starter is representative of the Design 05 Accused Products.

b) Infringement of the '015 Patent

271. On information and belief, select Respondents, including Respondent Smartech, import, sell for importation, and/or sell within the United States after importation the Design 05 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claim 1 of the '015 Patent. Certain of the Design 05 Accused Products also infringe one or more of dependent claims 10, 11, 14, 18, 19 and 21 of the '015 Patent. The Design 05 Accused Products satisfy all asserted claim limitations of the '015 Patent at the time of importation into the United States.

272. A claim chart comparing independent claim 1 of the '015 Patent to the representative Design 05 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 15.

c) Infringement of the '024 Patent

273. On information and belief, select Respondents, including Respondent Smartech, import, sell for importation, and/or sell within the United States after importation the Design 05 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claims 1, 29 and 30 of the '024 Patent. Certain of the Design 05 Accused Products also infringe one or more of dependent claims 4, 5, 6, 16, 19, 23, 24, and 26 of the '024 Patent. The Design 05 Accused Products satisfy all asserted claim limitations of the '024 Patent at the time of importation into the United States.

274. A claim chart comparing independent claims 1, 29, and 30 of the '024 Patent to the representative Design 05 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 15.

6. Design 06 Accused Products

a) Design 06

275. The Design 06 Accused Products are lithium battery powered jump starters offered under the WEEGO brand and have a cable assembly that includes a power switch with multiple transistors, and two sensors. The first sensor, which is the claimed vehicle battery isolation sensor, is a resistive divider sensor. The second sensor, which is the claimed reverse polarity sensor, is an optocoupler sensor. The WEEGO 22S model jump starter is representative of the Design 06 Accused Products.

b) Infringement of the '015 Patent

276. On information and belief, select Respondents, including Respondent Carku, import, sell for importation, and/or sell within the United States after importation the Design 06 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claim 1 of the '015 Patent. Certain of the Design 06 Accused Products also infringe one or more of dependent claims 4, 10, 11, 14, 18, 19 and 21 of the '015 Patent. The Design 06 Accused Products satisfy all asserted claim limitations of the '015 Patent at the time of importation into the United States.

277. A claim chart comparing independent claim 1 of the '015 Patent to the representative Design 06 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 16.

c) Infringement of the '024 Patent

278. On information and belief, select Respondents import, sell for importation, and/or sell within the United States after importation the Design 06 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claims 1, 29 and 30 of the '024 Patent. Certain of the Design 06 Accused Products also infringe one or more of

dependent claims 4, 5, 6, 16, 19, 23, 24, and 26 of the '024 Patent. The Design 06 Accused Products satisfy all asserted claim limitations of the '024 Patent at the time of importation into the United States.

279. A claim chart comparing independent claims 1, 29, and 30 of the '024 Patent to the representative Design 06 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 16.

7. Design 07 Accused Products

a) Design 07

280. The Design 07 Accused Products are lithium battery powered jump starters offered under the WINPLUS and TYPE-S brands and have a cable assembly that includes a power switch with multiple transistors, and two sensors. The first sensor, which is the claimed vehicle battery isolation sensor, is a resistive divider sensor. The second sensor, which is the claimed reverse polarity sensor, is also a resistive divider sensor. On information and belief, the WINPLUS and TYPE S brand jump starters are manufactured by Respondent Shenzhen Winplus. The Type S – AC56388 -BLK model jump starter is representative of the Design 07 Accused Products.

b) Infringement of the '015 Patent

281. On information and belief, select Respondents, including Respondent Winplus, import, sell for importation, and/or sell within the United States after importation the Design 07 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claim 1 of the '015 Patent. Certain of the Design 07 Accused Products also infringe one or more of dependent claims 4, 10, 11, 14, 18, 19 and 21 of the '015 Patent. The Design 07 Accused Products satisfy all asserted claim limitations of the '015 Patent at the time of importation into the United States.

282. A claim chart comparing independent claim 1 of the '015 Patent to the representative Design 07 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 17.

c) Infringement of the '024 Patent

283. On information and belief, select Respondents import, sell for importation, and/or sell within the United States after importation the Design 07 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claims 1, 29 and 30 of the '024 Patent. Certain of the Design 07 Accused Products also infringe one or more of dependent claims 4, 5, 6, 16, 19, 23, 24, and 26 of the '024 Patent. The Design 07 Accused Products satisfy all asserted claim limitations of the '024 Patent at the time of importation into the United States.

284. A claim chart comparing independent claims 1, 29, and 30 of the '024 Patent to the representative Design 07 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 17.

8. Design 08 Accused Products

a) Design 08

285. The Design 08 Accused Products are lithium battery powered jump starters having a SMART CLAMP branded cable assembly. The cable assembly includes a power switch with multiple transistors, and two sensors. The first sensor, which is the claimed vehicle battery isolation sensor, includes a resistive divider sensor and transistor. The second sensor, which is the claimed reverse polarity sensor, is a resistive divider sensor. The Design 08 Accused Products are offered under at least the Allstart and OEM Tools brands. The OEMTOOLS 24474 model jump starter is representative of the Design 09 Accused Products.

b) Infringement of the '015 Patent

286. On information and belief, select Respondents, including Allstart and OEM Tools, import, sell for importation, and/or sell within the United States after importation the Design 08 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claim 1 of the '015 Patent. Certain of the Design 08 Accused Products also infringe one or more of dependent claims 4, 10, 11, 14, 18, 19 and 21 of the '015 Patent. The Design 08 Accused Products satisfy all asserted claim limitations of the '015 Patent at the time of importation into the United States.

287. A claim chart comparing independent claim 1 of the '015 Patent to the representative Design 08 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 18.

9. Design 09 Accused Products

a) Design 09

288. The Design 09 Accused Products are lithium battery powered jump starters having a cable assembly includes a relay and two sensors. The first sensor, which is the claimed vehicle battery isolation sensor, is a resistive divider sensor. The second sensor, which is the claimed reverse polarity sensor, is a resistive sensor. The Design 09 Accused Products are offered under at least the Duralast and CarAIDE brands. The DURALAST DL-2000LI model jump starter is representative of the Design 09 Accused Products.

b) Infringement of the '015 Patent

289. On information and belief, select Respondents, including Duralast and CarAIDE, import, sell for importation, and/or sell within the United States after importation the Design 09 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claim 1 of the '015 Patent. Certain of the Design 09 Accused Products also

infringe one or more of dependent claims 10, 11, 14, 18, 19 and 21 of the '015 Patent. The Design 09 Accused Products satisfy all asserted claim limitations of the '015 Patent at the time of importation into the United States.

290. A claim chart comparing independent claim 1 of the '015 Patent to the representative Design 09 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 19.

10. Design 10 Accused Products

a) Design 10

291. The Design 10 Accused Products are lithium battery powered jump starters having a SMART CABLE branded cable assembly. The cable assembly includes a power switch with multiple transistors, and two sensors. The first sensor, which is the claimed vehicle battery isolation sensor, is a resistive divider sensor. The second sensor, which is the claimed reverse polarity sensor, is also a resistive sensor. The Design 10 Accused Products are offered under multiple brands, namely BUTURE, Finnemge, and UTRAI. The BUTURE BR500 model jump starter is representative of the Design 10 Accused Products.

b) Infringement of the '015 Patent

292. On information and belief, select Respondents import, sell for importation, and/or sell within the United States after importation the Design 10 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claim 1 of the '015 Patent. Certain of the Design 10 Accused Products also infringe one or more of dependent claims 4, 10, 11, 14, 18, 19 and 21 of the '015 Patent. The Design 10 Accused Products satisfy all asserted claim limitations of the '015 Patent at the time of importation into the United States.

293. A claim chart comparing independent claim 1 of the '015 Patent to the representative Design 10 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 20.

c) Infringement of the '024 Patent

294. On information and belief, select Respondents import, sell for importation, and/or sell within the United States after importation the Design 10 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claims 1, 29 and 30 of the '024 Patent. Certain of the Design 10 Accused Products also infringe one or more of dependent claims 4, 5, 6, 16, 19, 23, 24, and 26 of the '024 Patent. The Design 10 Accused Products satisfy all asserted claim limitations of the '024 Patent at the time of importation into the United States.

295. A claim chart comparing independent claims 1, 29, and 30 of the '024 Patent to the representative Design 10 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 20.

11. Design 11 Accused Products

a) Design 11

296. The Design 11 Accused Products are lithium battery powered jump starters having a cable assembly labeled as "SMART BOOSTER CABLE". The cable assembly includes a power switch with multiple transistors, and two sensors. The first sensor, which is the claimed vehicle battery isolation sensor, is a resistive sensor. The second sensor, which is the claimed reverse polarity sensor, is a resistive divider sensor. The Design 11 Accused Products are offered under multiple brands, including Energen and Performance. The ENERGEN AL12 model jump starter is representative of the Design 11 Accused Products.

b) Infringement of the '015 Patent

297. On information and belief, select Respondents import, sell for importation, and/or sell within the United States after importation the Design 11 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claim 1 of the '015 Patent. Certain of the Design 11 Accused Products also infringe one or more of dependent claims 4, 10, 11, 14, 18, 19 and 21 of the '015 Patent. The Design 11 Accused Products satisfy all asserted claim limitations of the '015 Patent at the time of importation into the United States.

298. A claim chart comparing independent claim 1 of the '015 Patent to the representative Design 11 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 21.

c) Infringement of the '024 Patent

299. On information and belief, select Respondents import, sell for importation, and/or sell within the United States after importation the Design 11 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claims 1, 29 and 30 of the '024 Patent. Certain of the Design 11 Accused Products also infringe one or more of dependent claims 4, 5, 6, 16, 19, 23, 24, and 26 of the '024 Patent. The Design 11 Accused Products satisfy all asserted claim limitations of the '024 Patent at the time of importation into the United States.

300. A claim chart comparing independent claims 1, 29, and 30 of the '024 Patent to the representative Design 11 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 21.

12. Design 12 Accused Products

a) Design 12

301. The Design 12 Accused Products are lithium battery powered jump starters offered under the HALO BOLT brand, that include a relay and two sensors within the main housing of the jump starter. The first sensor, which is the claimed vehicle battery isolation sensor, is a resistive divider sensor. The second sensor, which is the claimed reverse polarity sensor, is an optocoupler sensor. The HALO BOLT 4400 model jump starter is representative of the Design 12 Accused Products.

b) Infringement of the '015 Patent

302. On information and belief, select Respondents, including Carku, import, sell for importation, and/or sell within the United States after importation the Design 12 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claim 1 of the '015 Patent. Certain of the Design 12 Accused Products also infringe one or more of dependent claims 10, 11, 14, 18, 19 and 21 of the '015 Patent. The Design 12 Accused Products satisfy all asserted claim limitations of the '015 Patent at the time of importation into the United States.

303. A claim chart comparing independent claim 1 of the '015 Patent to the representative Design 12 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 22.

c) Infringement of the '024 Patent

304. On information and belief, select Respondents import, sell for importation, and/or sell within the United States after importation the Design 12 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claims 1, 29 and 30 of the '024 Patent. Certain of the Design 12 Accused Products also infringe one or more of

dependent claims 4, 5, 6, 16, 19, 23, 24, and 26 of the '024 Patent. The Design 12 Accused Products satisfy all asserted claim limitations of the '024 Patent at the time of importation into the United States.

305. A claim chart comparing independent claims 1, 29, and 30 of the '024 Patent to the representative Design 12 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 22.

13. Design 13 Accused Products

a) Design 13

306. The Design 13 Accused Products are lithium battery powered jump starters that include a relay and two sensors within the main housing of the jump starter. The first sensor, which is the claimed vehicle battery isolation sensor, is a resistive divider sensor. The second sensor, which is the claimed reverse polarity sensor, is also a resistive sensor. The Design 13 Accused Products are offered as least under the Schumacher and Die-Hard brands. On information and belief, the Design 13 Accused Products are manufactured by Respondent Schumacher. The SCHUMACHER 1316 model jump starter is representative of the Design 13 Accused Products.

b) Infringement of the '015 Patent

307. On information and belief, select Respondents, including Boltpower, import, sell for importation, and/or sell within the United States after importation the Design 13 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claim 1 of the '015 Patent. Certain of the Design 13 Accused Products also infringe one or more of dependent claims 10, 11, 14, 18, 19 and 21 of the '015 Patent. The Design 13 Accused Products satisfy all asserted claim limitations of the '015 Patent at the time of importation into the United States.

308. A claim chart comparing independent claim 1 of the '015 Patent to the representative Design 13 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 23.

c) Infringement of the '024 Patent

309. On information and belief, select Respondents import, sell for importation, and/or sell within the United States after importation the Design 13 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claims 1, 29 and 30 of the '024 Patent. Certain of the Design 13 Accused Products also infringe one or more of dependent claims 4, 5, 6, 16, 19, 23, 24, and 26 of the '024 Patent. The Design 13 Accused Products satisfy all asserted claim limitations of the '024 Patent at the time of importation into the United States.

310. A claim chart comparing independent claims 1, 29, and 30 of the '024 Patent to the representative Design 13 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 23.

14. Design 14 Accused Products

a) Design 14

311. The Design 14 Accused Products are lithium battery powered jump starters and have a cable assembly that includes a power switch with multiple transistors, and two sensors. The first sensor, which is the claimed vehicle battery isolation sensor, is a resistive divider sensor. The second sensor, which is the claimed reverse polarity sensor, is also a resistive divider sensor. On information and belief, the Design 14 Accused Products are offered by Respondents Stanley Black & Decker, Stanley Black & Decker (Shenzhen), Hairishen, and Baccuss. The STANLEY SS4LS model jump starter is representative of the Design 14 Accused Products.

b) Infringement of the '015 Patent

312. On information and belief, select Respondents, including Respondent Baccuss, import, sell for importation, and/or sell within the United States after importation the Design 14 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claim 1 of the '015 Patent. Certain of the Design 14 Accused Products also infringe one or more of dependent claims 4, 10, 11, 14, 18, 19 and 21 of the '015 Patent. The Design 14 Accused Products satisfy all asserted claim limitations of the '015 Patent at the time of importation into the United States.

313. A claim chart comparing independent claim 1 of the '015 Patent to the representative Design 14 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 24.

c) Infringement of the '024 Patent

314. On information and belief, select Respondents import, sell for importation, and/or sell within the United States after importation the Design 14 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claims 1, 29 and 30 of the '024 Patent. Certain of the Design 14 Accused Products also infringe one or more of dependent claims 4, 5, 6, 16, 19, 23, 24, and 26 of the '024 Patent. The Design 14 Accused Products satisfy all asserted claim limitations of the '024 Patent at the time of importation into the United States.

315. A claim chart comparing independent claims 1, 29, and 30 of the '024 Patent to the representative Design 14 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 24.

15. Design 15 Accused Products

a) Design 15

316. The Design 15 Accused Products are lithium battery powered jump starters offered under the TOUGHTTESTED brand and having a cable assembly that includes a relay and two sensors. The first sensor, which is the claimed vehicle battery isolation sensor, is an operational amplifier sensor. The second sensor, which is the claimed reverse polarity sensor, is a separate operational amplifier sensor. The TOUGHTTESTED TT-JSV8 model jump starter is representative of the Design 15 Accused Products.

b) Infringement of the '015 Patent

317. On information and belief, select Respondents import, sell for importation, and/or sell within the United States after importation the Design 15 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claim 1 of the '015 Patent. Certain of the Design 15 Accused Products also infringe one or more of dependent claims 10, 11, 14, 18, 19 and 21 of the '015 Patent. The Design 15 Accused Products satisfy all asserted claim limitations of the '015 Patent at the time of importation into the United States.

318. A claim chart comparing independent claim 1 of the '015 Patent to the representative Design 15 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 25.

c) Infringement of the '024 Patent

319. On information and belief, select Respondents import, sell for importation, and/or sell within the United States after importation the Design 15 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claims 1, 29 and 30 of the '024 Patent. Certain of the Design 15 Accused Products also infringe one or more of dependent claims 4, 5, 6, 16, 19, 23, 24, and 26 of the '024 Patent. The Design 15 Accused

Products satisfy all asserted claim limitations of the '024 Patent at the time of importation into the United States.

320. A claim chart comparing independent claims 1, 29, and 30 of the '024 Patent to the representative Design 15 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 25.

16. Design 16 Accused Products

a) Design 16

321. The Design 16 Accused Products are lithium battery powered jump starters offered under the Jump-n-Carry brand that have the power switch and two sensors within the main housing of the jump starter. The first sensor, which is the claimed vehicle battery isolation sensor, is a resistive divider sensor. The second sensor, which is the claimed reverse polarity sensor, is an optocoupler sensor. The Jump-n-Carry JNC345 model jump starter is representative of the Design 16 Accused Products.

b) Infringement of the '015 Patent

322. On information and belief, select Respondents, including Respondent Clore Automotive, sell for importation, and/or sell within the United States after importation the Design 16 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claim 1 of the '015 Patent. Certain of the Design 16 Accused Products also infringe one or more of dependent claims 4, 10, 14, 18, 19 and 21 of the '015 Patent. The Design 16 Accused Products satisfy all asserted claim limitations of the '015 Patent at the time of importation into the United States.

323. A claim chart comparing independent claim 1 of the '015 Patent to the representative Design 16 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 26.

c) Infringement of the '024 Patent

324. On information and belief, select Respondents, including Respondent Clore Automotive, import, sell for importation, and/or sell within the United States after importation the Design 16 Accused Products, which directly infringe, literally and/or under the doctrine of equivalents, at least independent claims 1, 29 and 30 of the '024 Patent. Certain of the Design 05 Accused Products also infringe one or more of dependent claims 4, 5, 6, 16, 19, 23, 24, and 26 of the '024 Patent. The Design 16 Accused Products satisfy all asserted claim limitations of the '024 Patent at the time of importation into the United States.

325. A claim chart comparing independent claims 1, 29, and 30 of the '024 Patent to the representative Design 16 Accused Product, and including photographs and drawings where applicable, is attached as Ex. 26.

B. Infringement of the Asserted Trademarks

326. NOCO owns all right, title, and interest in the Asserted Trademarks and has standing to bring an action for trademark infringement under the Lanham Act, 15 U.S.C. § 1051 et seq.

327. The Asserted Trademarks are on the Principal Register and such registration is prima facie evidence of validity, including secondary meaning. 15 U.S.C. § 1057(b). The Asserted Trademarks are used in commerce by NOCO to market, advertise, and sell the Boost® jump starters.

328. As explained below, a number of the Respondents use at least one of the Asserted Trademarks in point-of-sale displays posted on online retail stores with the intention of attracting U.S. consumers. These point-of-sale webpages, which include Respondents' own sites as well as third-party commerce sites including Amazon, contain images superimposed with NOCO's Asserted Trademarks and/or use NOCO's Asserted Trademarks in the descriptions of the Accused

Products. The webpages provide means for purchasing the Accused Products. Such displays are likely to cause confusion or mistake, and to deceive potential consumers and the public as to the source, origin, sponsorship or approval of Respondents' Accused Products, or as to the affiliation, connection, or association between Respondents and/or their jump starters and NOCO and/or the Boost(R) jump starters.

329. The exhibits cited below are screenshots of the Accused Products being displayed on a webpage where the product may be purchased.

330. The Asserted Trademarks are valid, owned by NOCO, and these webpages demonstrate a likelihood of confusion at the point-of-sale, and therefore Respondents are in violation of Section 32 of the Lanham Act. 15 U.S.C. § 1114.

The Respondents identified in the table below import into the United States, sell for importation, and/or sell in the United States after importation certain jump starters and components thereof, using point of sale webpages, and/or packaging that infringe the NOCO Trademarks:

Ultrasafe ('656 TM)	Safely Jump Start a Dead Battery in Seconds ('749 TM)
Audew	Autown
Autown	Beatit
Jumtop	Imazing
Sanrock	Jumtop
Topdon	Nexpow
Trekpow	Sanrock
	Trekpow

Table 3. Accused Products Infringing NOCO Asserted Trademarks



Fig. 3- NOCO Website- Use of the '749 Trademark

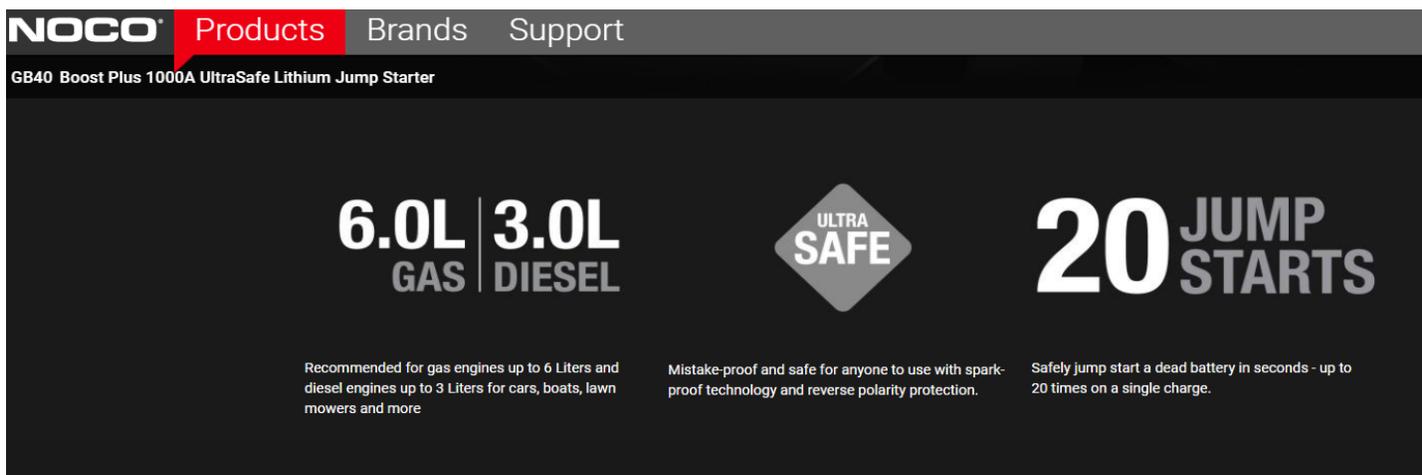


Fig. 4- NOCO Website- Use of the '656 and '749 Trademarks. Ex. 104

Audew

331. The Audew brand uses the NOCO “Ultrasafe” and “Safely Jump Start a Dead Battery in Seconds” trademarks on its website and Amazon listing for its jump starters, which infringes NOCO’s ’656 and ’749 Trademarks and are likely to cause confusion at the point-of-sale. See Ex. 27 and 50.

Autown

332. The Amazon listing for the Autown brand of jump starters includes the phrase “jump starter your dead battery in seconds,” and “jump start dead battery fast and safely” which

infringes NOCO's '749 Trademark and is likely to cause confusion at the point-of-sale. *See* Ex. 28 and 29. The Autown brand also markets its products using the term "ultra-safe" infringing the '656 Trademark. *See* Ex. 29.

Beatit

333. The Beatit brand uses the phrases "Safely Jumper start a dead battery in seconds" and "jump start a dead battery in seconds" on their Amazon listings for its jump starters, both of which infringe NOCO's '749 Trademark and are likely to cause confusion at the point-of-sale. *See* Ex. 30.

Imazing

334. The Imazing brand jump starter listing on Amazon uses the phrase "safely jump start a dead battery in seconds" which infringes the NOCO '749 Trademark and is likely to cause confusion at the point-of-sale. *See* Ex. 33.

Jumtop

335. The Jumtop brand of jump starters uses the phrases "ULTRA SAFE," "ultra-safe" and "jump start a dead battery in seconds" on its Amazon listings for its jump starters, which infringes both the NOCO '656 and '749 Trademarks and is likely to cause confusion at the point-of-sale. *See* Ex. 34, 35 and 36.

Nexpow

336. The Nexpow brand of jump starters uses the phrase "jump start a dead battery in seconds" on its Amazon listing for its jump starters, which infringes the NOCO '749 Trademark and is likely to cause confusion at the point-of-sale. *See* Ex. 37.

Sanrock

337. The Sanrock brand of jump starters uses the phrases “safely jump start a dead battery in seconds” and “ultra-safe” in its Amazon listings for its jump starters, which infringes the NOCO ’656 and ’749 Trademarks and is likely to cause confusion at the point-of-sale. *See Ex. 38 and 39.*



Fig.5- Image from Sanrock Amazon listing showing infringement of ’749 Trademark

Topdon

338. The Topdon brand of jump starters uses the phrase “ultra safe” on the packaging of its Volcano jump starters, infringing the NOCO ’656 Trademark. *See* Ex. 40.

Trekpow

339. The Trekpow brand of jump starters uses the phrases “ultra-safe,” “jump start dead battery in seconds,” and “safely jump start a dead battery in seconds” in its Amazon listings, which infringes the NOCO ’656 and ’749 Trademarks and is likely to cause confusion at the point-of-sale. *See* Ex. 41, 42 and 43.

VII. SPECIFIC INSTANCES OF IMPORTATION AND SALE

340. As stated above, on information and belief, a subset of Respondents manufactures and/or have manufactured outside the United States, import into the United States, and/or sell for importation into the United States the Accused Products. Other named Respondents import into the United States and/or sell after importation into the United States the Accused Products. The Accused Products, certain portable battery jump starters and related components, are imported, sold for importation, and/or sold after importation as described below.

A. AllStart

341. On information and belief, model numbers Boost (No. 550), Boost Max (No. 560), Boost Ultra (No. 590), and Micro-Boost (No. 540) (collectively, the “AllStart Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name AllStart. *See* Ex. 44C, ¶¶ 5-6.

342. On information and belief, products sold under the brand AllStart are manufactured by and/or imported for sale by Respondents Horizon Tool, Caraku, Boltpower, and Roypow. *See* Ex. 44C, ¶¶ 5-6.

343. The AllStart Accused Products are sold after importation into the United States. For example, a receipt from cal-vantools.com showing the purchase of an AllStart Boost (No.550) at an address in the United States is attached as Ex. 46.

344. The packaging of the AllStart Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 5 (citing Ex. 46).

B. Ampeak

345. On information and belief, model number JS1 (the “Ampeak Accused Product”) is manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Ampeak. *See* Ex. 44C, ¶¶ 7-8.

346. On information and belief, products sold under the brand Ampeak are manufactured by and/or imported for sale by Respondents Valuelink and Shenzhen Jiading. *See* Ex. 44C, ¶¶ 5-6.

347. The Ampeak Accused Product is sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of an Ampeak JS1 at an address in the United States is attached as Ex. 47.

348. The packaging of the Ampeak Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 7 (citing Ex. 47).

C. Antigravity Batteries

349. On information and belief, model numbers XP-1, XP-10, XP-10-HD, and XP-3 (collectively, the “Antigravity Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Antigravity. *See* Ex. 44C, ¶¶ 9-10.

350. On information and belief, products sold under the brand Antigravity are manufactured by and/or imported for sale by Respondents Antigravity, Carku, and Gulin. *See* Ex. 44C, ¶¶ 9-10.

351. The Antigravity Accused Products are sold after importation into the United States. For example, a receipt from antigravitybatteries.com showing the purchase of an Antigravity XP-1 and XP-10-HD at an address in the United States is attached as Ex. 48.

352. The packaging of the Antigravity Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 10 (citing Ex. 48).

D. Arteck

353. On information and belief, model numbers A7, D29, JS08, and JS12 (collectively, the “Arteck Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Arteck. *See* Ex. 44C, ¶¶ 11-12.

354. On information and belief, products sold under the brand Arteck are manufactured by and/or imported for sale by Respondents Arteck Electronic, Shenzhen Yike Electronics and Boltpower. *See* Ex. 44C, ¶¶ 11-12.

355. The Arteck Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of an Arteck A7 at an address in the United States is attached as Ex. 49.

356. The packaging of the Arteck Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 11 (citing Ex. 49).

E. Audew

357. On information and belief, model numbers Epower-146 (1000A/10800mAh), 500A/13800mAH, 800A/16800mAh, Epower-172 (1500A/17000mAh), and Epower-155

(1500A/2000mAh) (collectively, the “Audew Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Audew. *See* Ex. 44C, ¶¶ 13-14.

358. On information and belief, products sold under the brand Audew are manufactured by and/or imported for sale by Respondent Guangzhou Unique Electronics. *See* Ex. 44C, ¶¶ 13-14.

359. The Audew Accused Products are sold after importation into the United States. For example, a receipt from audew.com showing the purchase of an Audew Epower-146 (1000A/10800mAh) and Epower-172 (1500A/17000mAh) at an address in the United States is attached as Ex. 50.

360. The packaging of the Audew Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 11 (citing Ex. 50).

F. Autogen

361. On information and belief, model number MJS-P111B (4000A) (the “Autogen Accused Product”) is manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Autogen. *See* Ex. 44C, ¶¶ 15-16.

362. On information and belief, products sold under the brand Autogen are manufactured by and/or imported for sale by Respondents Ecoliving and Autogen. *See* Ex. 44C, ¶¶ 15-16.

363. The Autogen Accused Product is sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of an Autogen MJS-P111B (4000A) at an address in the United States is attached as Ex. 51.

364. The packaging of the Autogen Accused Product indicates that the product was “Made in China.” *See* Ex. 44C, ¶ 15 (citing Ex. 51).

G. Autown

365. On information and belief, model numbers RP-PI-01 (1000A), RP-PI02 (500A/10000mAh), RP-PI-03 (800A), and RP-PI-04 (2000A) (collectively, the “Autown Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Autown. *See* Ex. 44C, ¶¶ 17-18.

366. On information and belief, products sold under the brand Autown are manufactured by and/or imported for sale by Respondents Zhejiang Qingyou Electronic, Shenzhen Geilimei Technology, Shenzhen Aojie, and Shenzhen Shi Shenai. *See* Ex. 44C, ¶¶ 17-18.

367. The Autown Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of an Autown RP-PI-03 (800A) at an address in the United States is attached as Ex. 52.

368. The packaging of the Autown Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 17 (citing Ex. 52).

H. Battery Tender

369. On information and belief, model numbers 030-1011-WAL (1000A/8000mAh), 030-1011-WH (1000A/8000mAh), 030-1000-PM (600A/6000mAh), and 030-1010-WH (800A/7200mAh) (collectively, the “Battery Tender Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Battery Tender. *See* Ex. 44C, ¶¶ 19-20.

370. On information and belief, products sold under the brand Battery Tender are manufactured by and/or imported for sale by Respondents Deltona, Deltran, and Boltpower. *See* Ex. 44C, ¶¶ 19-20.

371. The Battery Tender Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Battery Tender 030-1010-WH (800A/7200mAh) at an address in the United States is attached as Ex. 53.

372. The packaging of the Battery Tender Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 19 (citing Ex. 53).

I. Beatit

373. On information and belief, model numbers B10 (500A), B10 Pro (800A), B7 (1200A), BP101 (2200A), D11 (800A), G18 (2000A), and G22 (1500A) (collectively, the “Beatit Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Beatit. *See* Ex. 44C, ¶¶ 21-23.

374. On information and belief, products sold under the brand Beatit are manufactured by and/or imported for sale by Respondent Shenzhen Mediatek Tong and Lianfatong. *See* Ex. 44C, ¶¶ 21-23.

375. The Beatit Accused Products are sold after importation into the United States. For example, receipts from Amazon.com showing the purchase of a Beatit B10, B10 Pro (800A), B7 (1200A), BP101 (2200A), D11 (800A), and G18 (200A) at an address in the United States is attached as Ex. 54.

376. The packaging of the Beatit Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶¶ 21-22 (citing Ex. 54).

J. Boltpower

377. On information and belief, model numbers A7P, D28, D29, G33A, and N02 (collectively, the “Boltpower Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Boltpower. *See* Ex. 44C, ¶¶ 24-26.

378. On information and belief, products sold under the brand Boltpower are manufactured by and/or imported for sale by Respondent Boltpower and Tii Trading. *See* Ex. 44C, ¶¶ 24-26.

379. The Boltpower Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com and eBay.com showing the purchase of a Boltpower A7P, D28, D29, G33A, and N02 at an address in the United States is attached as Ex. 55.

380. The packaging of the Boltpower Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶¶ 24-25 (citing Ex. 55).

K. Buture

381. On information and belief, model numbers BR300 and BR500 (collectively, the “Buture Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Buture. *See* Ex. 44C, ¶¶ 27-28.

382. On information and belief, products sold under the brand Buture are manufactured by and/or imported for sale by Respondents Shenzhen PuChengWeiLai Technology and ThiEye Technologies. *See* Ex. 44C, ¶¶ 27-28.

383. The Buture Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Buture BR500 at an address in the United States is attached as Ex. 56.

384. The packaging of the Buture Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 27 (citing Ex. 56).

L. CarAIDE

385. On information and belief, model number Super Safe (CMT3X) (the “CarAIDE Accused Product”) is manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name CarAIDE. *See* Ex. 44C, ¶¶ 29-30.

386. On information and belief, products sold under the brand CarAIDE are manufactured by and/or imported for sale by Respondents National Resources USA and CarAIDE USA. *See* Ex. 44C, ¶¶ 29-30.

387. The CarAIDE Accused Product is sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a CarAIDE Super Safe (CMT3X) at an address in the United States is attached as Ex. 57.

388. The packaging of the CarAIDE Accused Product indicates that the products was “Made in China.” *See* Ex. 44C, ¶ 29 (citing Ex. 57).

M. DB Power

389. On information and belief, model numbers DJS50 (800A/18000mAh), DJS80, G15, G16 (2000A/20800mAh), A09, DJS40, DJS50, DJS60, G09D, and N01 (collectively, the “DB Power Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name DB Power. *See* Ex. 44C, ¶¶ 31-32.

390. On information and belief, products sold under the brand DB Power are manufactured by and/or imported for sale by Respondent Shenzhen Valuelink. *See* Ex. 44C, ¶¶ 31-32.

391. The DB Power Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a DB Power DJS50 (800A/1800mAh) and G16 (2000A/20800mAh) at an address in the United States is attached as Ex. 58.

392. The packaging of the DB Power Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 31 (citing Ex. 58).

N. DieHard

393. On information and belief, model numbers 43448 (8000mAh) and DH110 (400A) (collectively, the “DieHard Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name DieHard. *See* Ex. 44C, ¶¶ 33-34.

394. On information and belief, products sold under the brand Schumacher are manufactured by and/or imported for sale by Respondent Schumacher. *See* Ex. 44C, ¶¶ 33-34.

395. The DieHard Accused Products are sold after importation into the United States. For example, receipts from Amazon.com and menards.com showing the purchase of a Die Hard DH110 and 43448 at an address in the United States are attached as Ex. 59.

396. The packaging of the DieHard Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 33 (citing Ex. 59).

O. Duralast

397. On information and belief, model numbers DL-2000II and DL-800L (collectively, the “Duralast Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Duralast. *See* Ex. 44C, ¶¶ 35-36.

398. On information and belief, products sold under the brand Duralast are manufactured by and/or imported for sale by Respondent Schumacher. *See* Ex. 44C, ¶¶ 21-23

399. The Duralast Accused Products are sold after importation into the United States. For example, a receipt from Autozone.com showing the purchase of a Duralast DL-800L at an address in the United States is attached as Ex. 60.

400. The packaging of the Duralast Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 35 (citing Ex. 60).

P. Energen

401. On information and belief, model numbers AL12 and AL6 (collectively, the “Energen Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Energen. *See* Ex. 44C, ¶¶ 37-38.

402. On information and belief, products sold under the brand Energen are manufactured by and/or imported for sale by Respondent Energen. *See* Ex. 44C, ¶¶ 37-38.

403. The Energen Accused Products are sold after importation into the United States. For example, a receipt from myenergen.com showing the purchase of an Energen AL12 at an address in the United States is attached as Ex. 61.

404. The packaging of the Energen Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 37 (citing Ex. 61).

Q. EverStart

405. On information and belief, model number SL097 (collectively, the “EverStart Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name EverStart. *See* Ex. 44C, ¶¶ 39-40.

406. On information and belief, products sold under the brand EverStart are manufactured by and/or imported for sale by Respondent Schumacher. *See* Ex. 44C, ¶¶ 39-40.

407. The EverStart Accused Products are sold after importation into the United States. For example, a receipt from Walmart.com showing the purchase of an EverStart SL097 at an address in the United States is attached as Ex. 62.

408. The packaging of the EverStart Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 39 (citing Ex. 62).

R. Fconegy

409. On information and belief, model numbers FC100 and FC200 (collectively, the “Fconegy Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Fconegy. *See* Ex. 44C, ¶¶ 41-42.

410. On information and belief, products sold under the brand Fconegy are manufactured by and/or imported for sale by Respondent Shenzhen Vigor Power Battery. *See* Ex. 44C, ¶¶ 41-42.

411. The Fconegy Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Fconegy FC100 at an address in the United States is attached as Ex. 63.

412. The packaging of the Fconegy Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 41 (citing Ex. 63).

S. Flylinktech

413. On information and belief, model numbers CF100, CF200, CF300, CF400, and CF600 (collectively, the “Flylinktech Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold

within the United States after importation under the brand name Flylinktech. *See* Ex. 44C, ¶¶ 43-44.

414. On information and belief, products sold under the brand Flylinktech are manufactured by and/or imported for sale by Respondent Flylink Tech Company. *See* Ex. 44C, ¶¶ 43-44.

415. The Flylinktech Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Flylinktech CF600 at an address in the United States is attached as Ex. 64.

416. The packaging of the Flylinktech Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 43 (citing Ex. 64).

T. Fnnemge

417. On information and belief, model number Q9C (the “Fnnemge Accused Product”) is manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Fnnemge. *See* Ex. 44C, ¶¶ 45-46.

418. On information and belief, products sold under the brand Fnnemge are manufactured by and/or imported for sale by Respondent Hagchebao. *See* Ex. 44C, ¶¶ 45-46.

419. The Fnnemge Accused Product is sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Fnnemge Q9C at an address in the United States is attached as Ex. 65.

420. The packaging of the Fnnemge Accused Product indicates that the product is “Made in China.” *See* Ex. 44C, ¶¶ 45 (citing Ex. 65).

U. Freeman

421. On information and belief, model number P800AJS (the “Freeman Accused Product”) is manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Freeman. *See* Ex. 44C, ¶¶ 47-48.

422. On information and belief, products sold under the brand Freeman are manufactured by and/or imported for sale by Respondents Prime Global Products and Carku. *See* Ex. 44C, ¶¶ 47-48.

423. The Freeman Accused Product is sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Freeman P800AJS at an address in the United States is attached as Ex. 66.

424. The packaging of the Freeman Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 47 (citing Ex. 66).

V. Gooloo

425. On information and belief, model numbers GP1500, GP200, GP37-Plus, GP80 (800A), and GT-1500 (collectively, the “Gooloo Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Gooloo. *See* Ex. 44C, ¶¶ 49-51.

426. On information and belief, products sold under the brand Gooloo are manufactured by and/or imported for sale by Respondent Gooloo and Carku. *See* Ex. 44C, ¶¶ 41-42.

427. The Gooloo Accused Products are sold after importation into the United States. For example, receipts from Amazon.com showing the purchase of a Gooloo GP80 (800A), GP200, and GT-1500 at an address in the United States is attached as Ex. 67.

428. The packaging of the Gooloo Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶¶ 49-50 (citing Ex. 57).

W. Grepro

429. On information and belief, model numbers GP-JS-1500A (GP71C) and GP-JS-500A (collectively, the “Grepro Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Grepro. *See* Ex. 44C, ¶¶ 52-53.

430. On information and belief, products sold under the brand Grepro are manufactured by and/or imported for sale by Respondents Huizhou Grepro E-Commerce and Jiahongjing. *See* Ex. 44C, ¶¶ 52-53. The Grepro Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Grepro GP-JS-1500A (GP71C) at an address in the United States is attached as Ex. 68.

431. The packaging of the Grepro Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 52 (citing Ex. 68).

X. Halo

432. On information and belief, model numbers Bolt 44000, Bolt 57720, Bolt 58830, Bolt Flashlight, and Bolt Wireless (collectively, the “Halo Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Halo. *See* Ex. 44C, ¶¶ 54-55.

433. On information and belief, products sold under the brand Halo are manufactured by and/or imported for sale by Respondents Caraku, ZhongKang, and Halo2Cloud. *See* Ex. 44C, ¶¶ 54-55.

434. The Halo Accused Products are sold after importation into the United States. For example, a receipt from Zagg.com showing the purchase of a Halo Bolt 44000 at an address in the United States is attached as Ex. 69.

435. The packaging of the Halo Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶¶ 54 (citing Ex. 69).

Y. iClever

436. On information and belief, model number IC-JQ21Y (the “iClever Accused Product”) is manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name iClever. *See* Ex. 44C, ¶¶ 56-58.

437. On information and belief, products sold under the brand iClever are manufactured by and/or imported for sale by Respondents Caraku and Shenzhen Thousandshores. *See* Ex. 44C, ¶¶ 56-58.

438. On information and belief, the iClever Accused Product is sold after importation into the United States. *See* Ex. 44C, ¶¶ 56-58 (citing Ex. 70).

439. On information and belief, the iClever Accused Product is manufactured in China. *See* Ex. 44C, ¶¶ 56-58 (citing Ex. 70).

Z. Imazing

440. On information and belief, model numbers G26, G27, G29P, IM23, IM25, IM27/G26, IM29/G29, IM31, and J8 (collectively, the “Imazing Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Imazing. *See* Ex. 44C, ¶¶ 59-60.

441. On information and belief, products sold under the brand Imazing are manufactured by and/or imported for sale by Respondents Nice Team Enterprise, Boltpower, Circus Link, Nice Well, and Smartwell. *See* Ex. 44C, ¶¶ 59-60.

442. The Imazing Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Imazing J8 and IM23, and IM31 at an address in the United States is attached as Ex. 71.

443. The packaging of the Imazing Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 59 (citing Ex. 71).

AA. Jump-N-Carry

444. On information and belief, model numbers JNC325 and JNC345 (collectively, the “Jump-N-Carry Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Jump-N-Carry. *See* Ex. 44C, ¶¶ 61-62.

445. On information and belief, products sold under the brand Jump-N-Carry are manufactured by and/or imported for sale by Respondents Guangdong Marshall and Clore Automotive. *See* Ex. 44C, ¶¶ 61-62.

446. The Jump-N-Carry Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Jump-N-Carry JNC345 at an address in the United States is attached as Ex. 107.

447. The packaging of the Jump-N-Carry Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶¶ 61 (citing Ex. 107).

BB. Jumtop

448. On information and belief, model numbers N13, D09, E18, and N12 (collectively, the “Jumtop Accused Products”) are manufactured outside the United States and sold for

importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Jumtop. *See* Ex. 44C, ¶¶ 63-64.

449. On information and belief, products sold under the brand Jumtop are manufactured by and/or imported for sale by Respondent Autolion and Pengfenghe. *See* Ex. 44C, ¶¶ 63-64.

450. The Jumtop Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Jumtop N13 at an address in the United States is attached as Ex. 72.

451. The packaging of the Jumtop Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 63 (citing Ex. 72).

CC. KTI (K-Tool International)

452. On information and belief, model numbers KTI-74391, KTI-74392, and KTI-74393 (collectively, the “K-Tool Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name K-Tool. *See* Ex. 44C, ¶¶ 65-66.

453. On information and belief, products sold under the brand K-Tool are manufactured by and/or imported for sale by Respondents K-Tool and Boltpower. *See* Ex. 44C, ¶¶ 65-66.

454. The K-Tool Accused Products are sold after importation into the United States. For example, a receipt from Walmart.com showing the purchase of a K-Tool KTI-74392 at an address in the United States is attached as Ex. 73.

455. The packaging of the K-Tool Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 65 (citing Ex. 73).

DD. Lemsir

456. On information and belief, model numbers L6 (800A/10800mAh), V1 (2000A/21000mAh), V2 (1500A/15600mAh), V3 (2200A/21000mAh), and V8

(800A/12800mAh) (collectively, the “Lemsir Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Lemsir. *See* Ex. 44C, ¶¶ 67-68.

457. On information and belief, products sold under the brand Lemsir are manufactured by and/or imported for sale by Respondents Shenzhen Mediatek Tong and Lianfatong. *See* Ex. 44C, ¶¶ 67-68.

458. The Lemsir Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Lemsir V8 (800A/12800mAh) at an address in the United States is attached as Ex. 74.

459. The packaging of the Lemsir Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 67 (citing Ex. 74).

EE. Loftek

460. On information and belief, model numbers Y29 and G21 (collectively, the “Loftek Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Loftek. *See* Ex. 44C, ¶¶ 69-70.

461. On information and belief, products sold under the brand Loftek are manufactured by and/or imported for sale by Respondent Boltpower. *See* Ex. 44C, ¶¶ 69-70.

462. The Loftek Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Loftek G21 at an address in the United States is attached as Ex. 75.

463. The packaging of the Loftek Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 69 (citing Ex. 75).

FF. Matco Tools

464. On information and belief, model numbers MICROJUMP, MINIJUMP3, and VERSAPRO3 (collectively, the “Matco Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Matco. *See* Ex. 44C, ¶¶ 71-73.

465. On information and belief, products sold under the brand Matco are manufactured by and/or imported for sale by Respondents Matco, Carku, Horizon Tool, and Roypow. *See* Ex. 44C, ¶¶ 71-73.

466. The Matco Accused Products are sold after importation into the United States. For example, receipts from matcotools.com showing the purchase of a Matco MICROJUMP and VERSAPRO3 at an address in the United States is attached as Ex. 76.

467. The packaging of the Matco Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶¶ 71-72 (citing Ex. 76).

GG. M Moock

468. On information and belief, model numbers MK200 (1500A) and MK800 (2000A) (collectively, the “M Moock Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name M Moock. *See* Ex. 44C, ¶¶ 74-75.

469. On information and belief, products sold under the brand M Moock are manufactured by and/or imported for sale by Respondents Shenzhen Moock and Shenzhen Muke Technology. *See* Ex. 44C, ¶¶ 74-75.

470. The M Moock Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a M Moock MK800 (2000A) at an address in the United States is attached as Ex. 77.]

471. The packaging of the M Moock Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 71 (citing Ex. 77).

HH. Nekteck

472. On information and belief, model numbers NK-JS19800 (2000A/19800mAh), NK-JS12000 (D31) (500A/12000mAh), NK-JS12000 (600A/16800mAh), and D45 (800A/20000mAh) (collectively, the “Nekteck Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Nekteck. *See* Ex. 44C, ¶¶ 76-77.

473. On information and belief, products sold under the brand Nekteck are manufactured by and/or imported for sale by Respondents Nekteck, Medcursor, and Sitect Instruments. *See* Ex. 44C, ¶¶ 76-77.

474. The Nekteck Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Nekteck NK-JS12000 (D31) (500A/12000mAh) and NK-JS12000 (600A/16800mAh) at an address in the United States is attached as Ex. 78.

475. The packaging of the Nekteck Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 76 (citing Ex. 78).

II. Nexpow

476. On information and belief, model numbers G7 (2000A) and G7 (1500A) (collectively, the “Nexpow Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Nexpow. *See* Ex. 44C, ¶¶ 78-79.

477. On information and belief, products sold under the brand Nexpow are manufactured by and/or imported for sale by Respondents Boltpower, Xinzexing, and Hangchebao. *See* Ex. 44C, ¶¶ 78-79.

478. The Nexpow Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Nexpow G17 (1500A) at an address in the United States is attached as Ex. 79.

479. The packaging of the Nexpow Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶¶ 78 (citing Ex. 79).

JJ. OEM Tools

480. On information and belief, model numbers 24474 (8000mAh), 24475 (12000mAh), and 24476 (18000mAh) (collectively, the “OEM Tools Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name OEM Tools. *See* Ex. 44C, ¶¶ 80-81.

481. On information and belief, products sold under the brand OEM Tools are manufactured by and/or imported for sale by Respondent Great Neck. *See* Ex. 44C, ¶¶ 80-81.

482. The OEM Tools Accused Products are sold after importation into the United States. For example, a receipt from Autozone.com showing the purchase of a OEM Tools 24474 (8000mAh) at an address in the United States is attached as Ex. 80.

483. The packaging of the OEM Tools Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 80 (citing Ex. 80).

KK. Performance Tool

484. On information and belief, model number W16750 (collectively, the “Performance Tool Accused Products”) are manufactured outside the United States and sold for importation into

the United States, imported into the United States, and/or sold within the United States after importation under the brand name Performance Tool. *See* Ex. 44C, ¶¶ 82-83.

485. On information and belief, products sold under the brand Performance Tool are manufactured by and/or imported for sale by Respondent Wilmar Corporation and Chao Fung Trading Co. *See* Ex. 44C, ¶¶ 82-83.

486. The Performance Tool Accused Products are sold after importation into the United States. For example, a receipt from carid.com showing the purchase of a Performance Tool W16750 at an address in the United States is attached as Ex. 81.

487. The packaging of the Performance Tool Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶¶ 82-83 (citing Ex. 81).

LL. Platinum Tech

488. On information and belief, model number PLT-99301 (the “Platinum Tech Accused Product”) is manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Platinum Tech. *See* Ex. 44C, ¶¶ 84-85.

489. On information and belief, products sold under the brand Platinum Tech are manufactured by and/or imported for sale by Respondents ATD Tools, Sun Tech, and Carku. *See* Ex. 44C, ¶¶ 84-85

490. The Platinum Tech Accused Product is sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Platinum Tech PLT-99301 at an address in the United States is attached as Ex. 82.

491. The packaging of the Platinum Tech Accused Product indicates that the product is “Made in China.” *See* Ex. 44C, ¶¶ 84 (citing Ex. 82).

MM. PowerCache

492. On information and belief, model numbers 39602 and 39603 (G19) (collectively, the “PowerCache Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name PowerCache. *See* Ex. 44C, ¶¶ 86-87.

493. On information and belief, products sold under the brand PowerCache are manufactured by and/or imported for sale by Respondent MonoPrice. *See* Ex. 44C, ¶¶ 86-87.

494. The PowerCache Accused Products are sold after importation into the United States. For example, a receipt from Monoprice.com showing the purchase of a PowerCache 39603 (G19) at an address in the United States is attached as Ex. 83.

495. The packaging of the PowerCache Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶¶ 86-87 (citing Ex. 83).

NN. PowerMax

496. On information and belief, model numbers PM91004 and PM91006 (collectively, the “PowerMax Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name PowerMax. *See* Ex. 44C, ¶¶ 88-89

497. On information and belief, products sold under the brand PowerMax are manufactured by and/or imported for sale by Respondents PowerMax and Caraku. *See* Ex. 44C, ¶¶ 88-89.

498. The PowerMax Accused Products are sold after importation into the United States. For example, a receipt from homedepot.com showing the purchase of a PowerMax PM91006 at an address in the United States is attached as Ex. 84.

499. On information and belief, the PowerMax Accused Products are manufactured in China. *See* Ex. 44C, ¶ 88 (citing Ex. 84).

OO. Roav

500. On information and belief, model numbers Pro 1000A and Pro 800 (collectively, the “Roav Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Roav. *See* Ex. 44C, ¶¶ 90-91.

501. On information and belief, products sold under the brand Roav are manufactured by and/or imported for sale by Respondents Anker Innovations, Anker Technology, and Anker Technology (UK). *See* Ex.85.

502. The Roav Accused Products are sold after importation into the United States. For example, a receipt from bestbuy.com showing the purchase of a Roav Pro 800 at an address in the United States is attached as Ex. 85.

503. The packaging of the Roav Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 90 (citing Ex. 85).

PP. Sanrock

504. On information and belief, model number G37 (the “Sanrock Accused Product”) is manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Sanrock. *See* Ex. 44C, ¶¶ 92-93.

505. On information and belief, products sold under the brand Sanrock are manufactured by and/or imported for sale by Respondent Shenzhen Li Feng Maoyiyouxiangognsi. *See* Ex. 44C, ¶¶ 92-93.

506. The Sanrock Accused Product is sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Sanrock G37 at an address in the United States is attached as Ex. 86.

507. The packaging of the Sanrock Accused Product indicates that the product is “Made in China.” *See* Ex. 44C, ¶ 92 (citing Ex. 86).

QQ. Schumacher

508. On information and belief, model numbers SL1312 (600A), SL1314 (600A), SL1315 (800A), SL1316 (1000A), SL1317 (1000A), SL1327 (800A), SL 1396 (800A) (collectively, the “Schumacher Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Schumacher. *See* Ex. 44C, ¶¶ 94-98.

509. On information and belief, products sold under the brand Schumacher are manufactured by and/or imported for sale by Respondents Schumacher and Pep Boys. *See* Ex. 44C, ¶¶ 94-98.

510. The Schumacher Accused Products are sold after importation into the United States. For example, receipts from batterychargers.com, Walmart.com, Oreillyauto.com, and homedepot.com showing the purchase of a Schumacher SL 1312, SL1315, SL1316, and SL1396 at an address in the United States are attached as Ex. 87.

511. The packaging of the Schumacher Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 97 (citing Ex. 87).

RR. Smartech

512. On information and belief, model numbers JS-10000, JS-15000, JS-15000N, JS-6000, JS-8000, JS-8000N, and TECH-5000P (collectively, the “Smartech Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported

into the United States, and/or sold within the United States after importation under the brand name Smartech. *See* Ex. 44C, ¶¶ 99-100.

513. On information and belief, products sold under the brand Smartech are manufactured by and/or imported for sale by Respondents Smartech and Geostar. *See* Ex. 44C, ¶¶ 99-100.

514. The Smartech Accused Products are sold after importation into the United States. For example, a receipt from smartech.com showing the purchase of a Smartech JS-10000, JS-15000, JS-15000N, JS-8000N, and TECH-5000P at an address in the United States is attached as Ex. 88.

515. The packaging of the Smartech Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 99 (citing Ex. 88).

SS. Stanley

516. On information and belief, model number SS4LS (the “Stanley Accused Product”) is manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Stanley. *See* Ex. 44C, ¶¶ 101-102.

517. On information and belief, products sold under the brand Stanley are manufactured by and/or imported for sale by Respondents Hairishen, Baccus, Sunlux, Stanley Black & Decker (Shenzhen), and Stanley Black & Decker. *See* Ex. 44C, ¶¶ 101-102.

518. The Stanley Accused Product is sold after importation into the United States. For example, a receipt from Walmart.com showing the purchase of a Stanley SS4LS at an address in the United States is attached as Ex. 89.

519. The packaging of the Stanley Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 101 (citing Ex. 89.).

TT. Tacklife

520. On information and belief, model numbers KP120, KP200, T6, T8 (Newer Model), T8 Max, T8 MAX, and T8 Pro (collectively, the “Tacklife Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Tacklife. *See* Ex. 44C, ¶¶ 103-107.

521. On information and belief, products sold under the brand Tacklife are manufactured by and/or imported for sale by Respondents Aukey and Shenzhen Take Tools. *See* Ex. 44C, ¶¶ 103-107.

522. The Tacklife Accused Products are sold after importation into the United States. For example, receipts from Amazon.com showing the purchase of a Tacklife T8, T8 (Newer Model), T8 MAX, and T8 Pro at an address in the United States are attached as Ex. 90.

523. The packaging of the Tacklife Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶¶ 103-106 (citing Ex. 90).

UU. Tooliom

524. On information and belief, model number Epower-125 (2000A) (the “Tooliom Accused Product”) is manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Tooliom. *See* Ex. 44C, ¶¶ 108-109.

525. On information and belief, products sold under the brand Tooliom are manufactured by and/or imported for sale by Respondent Caraku and Ningbo Zenon Electrical. *See* Ex. 44C, ¶¶ 108-109.

526. The Tooliom Accused Product is after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Tooliom Epower-125 (2000A) at an address in the United States is attached as Ex. 91.

527. The packaging of the Tooliom Accused Product indicates that the product is “Made in China.” *See* Ex. 44C, ¶ 108 (citing Ex. 91).

VV. Topdon

528. On information and belief, model numbers VOLCANO1500 and VOLCANO2000 (collectively, the “Topdon Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Topdon. *See* Ex. 44C, ¶¶ 110-111.

529. On information and belief, products sold under the brand Topdon are manufactured by and/or imported for sale by Respondents Shenzhen Topdon, Shenzhen Dingjiang Technology and Lianke. *See* Ex. 44C, ¶¶ 110-111.

530. The Topdon Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Topdon VOLCANO2000 at an address in the United States is attached as Ex. 92.

531. The packaging of the Topdon Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 110 (citing Ex. 92).

WW. Topvision

532. On information and belief, model number G26 (the “Topvision Accused Product”) is manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Topvision. *See* Ex. 44C, ¶¶ 112-113.

533. On information and belief, products sold under the brand Topvision are manufactured by and/or imported for sale by Respondents Shenzhen Jieqi Digital and Boltpower. *See* Ex. 44C, ¶¶ 112-113.

534. The Topvision Accused Product is sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Topvision G26 at an address in the United States is attached as Ex. 93.

535. The packaging of the Topvision Accused Product indicates that the products is “Made in China.” *See* Ex. 44C, ¶ 112 (citing Ex. 93).

XX. Toughtested

536. On information and belief, model numbers TT-JSV8 and TT-JSV8 (500A) (collectively, the “Toughtested Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Toughtested. *See* Ex. 44C, ¶¶ 114-115.

537. On information and belief, products sold under the brand Toughtested are manufactured by and/or imported for sale by Respondents Just Quality and Mizco International. *See* Ex. 44C, ¶¶ 114-115.

538. The Toughtested Accused Products are sold after importation into the United States. For example, a receipt from toughtested.com showing the purchase of a Toughtested TT-JSV8 at an address in the United States is attached as Ex. 94.

539. The packaging of the Toughtested Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 114 (citing Ex. 94).

YY. Trempow

540. On information and belief, model numbers A18, G22, and TJ2500 (collectively, the “Trempow Accused Products”) are manufactured outside the United States and sold for importation

into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Trekpow. *See* Ex. 44C, ¶¶ 116-117.

541. On information and belief, products sold under the brand Trekpow are manufactured by and/or imported for sale by Respondents Substanbo Innovations and Boltpower. *See* Ex. 44C, ¶¶ 116-117.

542. The Trekpow Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Trekpow G22 at an address in the United States is attached as Ex. 95.

543. The packaging of the Trekpow Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 116.

ZZ. Type S

544. On information and belief, model numbers AC56388-BLK, AC56789-AM, AC56794-1 (collectively, the “Type S Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Type S. *See* Ex. 44C, ¶¶ 118-119.

545. On information and belief, products sold under the brand Type S are manufactured by and/or imported for sale by Respondents Shenzhen Winplus and Winplus North America. *See* Ex. 44C, ¶¶ 118-119.

546. The Type S Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Type S AC56388-BLK at an address in the United States is attached as Ex. 96.

547. The packaging of the Type S Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 118 (citing Ex. 96).

AAA. Utrai

548. On information and belief, model number Jstar One (the “Utrai Accused Product”) is manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Utrai. *See* Ex. 44C, ¶¶ 120-121.

549. On information and belief, products sold under the brand Utrai are manufactured by and/or imported for sale by Respondent ThiEye Technologies. *See* Ex.44C, ¶¶ 120-121.

550. The Utrai Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Utrai Jstar One at an address in the United States is attached as Ex. 97.

551. The packaging of the Utrai Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 120 (citing Ex. 97).

BBB. Vavofo

552. On information and belief, model number G23P (the “Vavofo Accused Product”) is manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Vavofo. *See* Ex. 44C, ¶¶ 122-124.

553. On information and belief, products sold under the brand Vavofo are manufactured by and/or imported for sale by Respondent Boltpower. *See* Ex. 44C, ¶¶ 122-124.

554. On information and belief, the Vavofo Accused Product is sold after importation into the United States. For example, a listing from Amazon.com indicating the Vavofo Accused Product is manufactured by Respondent Boltpower is attached as Ex. 98.

555. The Vavofo Accused Product also indicates that the product is “Made in China.” *See* Ex. 44C, ¶ 122 (citing Ex. 98).

CCC. Vekkia

556. On information and belief, model numbers THOR-1000 and THOR-3000(collectively, the “Vekkia Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Vekkia. *See* Ex. 44C, ¶¶ 125-126.

557. On information and belief, products sold under the brand Vekkia are manufactured by and/or imported for sale by Respondents Chic Electrics and Yuyao. *See* Ex. 44C, ¶¶ 124-126.

558. The Vekkia Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Vekkia THOR-1000 at an address in the United States is attached as Ex. 99.

559. The packaging of the Vekkia Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 125 (citing Ex. 99).

DDD. Weego

560. On information and belief, model numbers 22, 44.1, 66.2, 154, 22s (collectively, the “Weego Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Weego. *See* Ex. 44C, ¶¶ 127-128.

561. On information and belief, products sold under the brand Weego are manufactured by and/or imported for sale by Respondents Paris Corporation, Carku, and Jierujia. *See* Ex. 44C, ¶¶ 127-128.

562. The Weego Accused Products are sold after importation into the United States. For example, a receipt from myweego.com showing the purchase of a Weego 22s at an address in the United States is attached as Ex. 101.

563. The packaging of the Weego Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 127 (citing Ex. 101).

564.

EEE. Winplus

565. On information and belief, model numbers AC530171-1, AC55717-1, AC55929-6/1, AC55929-60, (collectively, the “Winplus Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Winplus. *See* Ex. 44C, ¶¶ 129-130.

566. On information and belief, products sold under the brand Winplus are manufactured by and/or imported for sale by Respondents Shenzhen Winplus and Winplus North America. *See* Ex. 44C, ¶¶ 129-130.

567. The Winplus Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Winplus AC55717-1 at an address in the United States is attached as Ex. 100.

568. The packaging of the Winplus Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 129 (citing Ex. 100).

FFF. Xiaomi

569. On information and belief, model number Midrive PS01 (the “Xiaomi Accused Product”) is manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Xiaomi. *See* Ex. 44C, ¶¶ 131-132.

570. On information and belief, products sold under the brand Xiaomi are manufactured by and/or imported for sale by Respondents 70mai and Nex Digitronix. *See* Ex. 44C, ¶¶ 131-133.

571. On information and belief, the Xiaomi Accused Product is sold after importation into the United States. For example, Walmart.com and Amazon.com listings indicate the Xiaomi Accused Product is manufactured by and/or imported by Respondents 70mai and Nex Digitronix. *See* Ex. 44C, ¶¶ 131-133 (citing Ex. 102).

572. On information and belief, the Xiaomi Accused Product is manufactured in China. *See* Ex. 44C, ¶¶ 131-133 (citing Ex. 102).

GGG. Yaber

573. On information and belief, model numbers YR100, YR200, YR 600, YR500, YR700, and YR400 (collectively, the “Yaber Accused Products”) are manufactured outside the United States and sold for importation into the United States, imported into the United States, and/or sold within the United States after importation under the brand name Yaber. *See* Ex. 44C, ¶¶ 134-135.

574. On information and belief, products sold under the brand Yaber are manufactured by and/or imported for sale by Respondents ThiEye Technologies and Shenzhen PuChengWeiLai Technology. *See* Ex. 44C, ¶¶ 134-135.

575. The Yaber Accused Products are sold after importation into the United States. For example, a receipt from Amazon.com showing the purchase of a Yaber YR400 at an address in the United States is attached as Ex. 103.

576. The packaging of the Yaber Accused Products indicates that the products are “Made in China.” *See* Ex. 44C, ¶ 134 (citing Ex. 103).

VIII. HARMONIZED TARIFF SCHEDULE ITEM NUMBERS

577. The Accused Products are classified under at least the following subheadings of the Harmonized Tariff Schedule of the United States: 8504.40 (static converters) 8506.50 (lithium batteries); 8507.10, 8507.60 (lithium-ion electric storage batteries); 8511.40, 8511.50 (starter

motors and generators), 8516.60, 8516.71 (ovens, coffee or tea makers); 8539.50.00 (LED lamps). These classifications are exemplary in nature and not intended to restrict the scope of any exclusion order or other remedy ordered by the Commission.

IX. DOMESTIC INDUSTRY

578. As required by 19 U.S.C. § 1337(a)(2), a domestic industry, as defined by 19 U.S.C. § 1337(a)(3), exists in the United States with respect to the Asserted Patents. Since its founding in 1914 with the development of battery corrosion preventative products in Cleveland, Ohio, where NOCO remains headquartered to this day, NOCO continues to research, develop, manufacture, and sell innovative battery-related products.

A. Technical Prong

579. NOCO has, and continues to make, significant and substantial investments in plant and equipment, labor and capital, and engineering and research and development with respect to the products that practice one or more claims of the Asserted Patents (“NOCO Domestic Industry Products”), including all six of the NOCO Boost® jump starter models. The NOCO Boost® jump starters practice at least the following claims of the Asserted Patents shown in Table 4:

Asserted Patent	Exemplary DI Claim(s)	Exemplary DI Product
9,007,015	1	GB40
10,604,024	1, 29, 30	GB40

Table 4. Asserted Patents Practiced by Domestic Industry Products

580. The NOCO Domestic Industry Products all practice the claims of the Asserted Patents in the same manner. Claim charts demonstrating how the representative NOCO Domestic Industry Product practices these claims are attached as Confidential Exhibit 10C. This claim chart provides a basis for the domestic industry relating to both the ’015 and ’024 Patents.

581. The Asserted Trademarks appear in NOCO's website marketing materials and product information. *See* Ex. 8 and 104. This use of the Asserted Trademarks in commerce provides a basis for the domestic industry relating to both the '656 and '749 Trademarks.

B. Economic Prong

582. NOCO conducts all of its engineering, research and development, product design, testing, and sample construction in the United States. As such, NOCO has made significant investments in plant and equipment, labor and capital, and substantial investments in engineering, research and development with respect to the Asserted Patents and Asserted Trademarks in the United States, satisfying the requirements of 19 U.S.C. § 337(a)(3)(A)-(C). NOCO has invested, and continued to invest, in the United States millions of dollars per year in activities related to the design, engineering, development, testing, marketing, distribution, customer service, and warranty fulfillment relating to the NOCO Domestic Industry Products.

583. NOCO's headquarters in Glenwillow, Ohio houses NOCO's sales and marketing department, and serves as the main distribution center for North America. NOCO conducts product testing, compliance activities, and other technical support the Glenwillow facility. Accompanying this Complaint as Confidential Exhibit 105C is the Declaration of Jeffery Weiner, which provides information about NOCO's investments in connection with the NOCO Domestic Industry Products. Ex. 105C (DI Dec.) at ¶¶16-35.

584. NOCO conducts its design, research, and development activities at its facility in Peoria, Arizona. *Id.* at ¶13. NOCO conducts additional product design activities at its facility in Tempe, Arizona. *Id.* at ¶ 14.

585. NOCO has also employed significant labor and capital with respect to the NOCO Domestic Industry Products. *See* Ex. 105C at ¶¶ 22-30.

586. The first NOCO Boost® jump starter was introduced in 2014, and NOCO has continually improved the product since then. Notably, NOCO’s spending on research and development has increased in each of the past three years. Ex. 105C at ¶33. From 2017 to the present, NOCO has paid several million dollars in payroll to engineering and technical personnel in the United States, whose employment pertains to the engineering and technical aspects of the Boost® product line, including the patented subject matter. *Id.* at ¶34. NOCO has also invested in customer-specific design projects.

587. Since 2016 the majority of NOCO’s revenue has been derived from sales of its Boost® line of jump starters. *Id.* at ¶15.

X. RELATED LITIGATION

588. As of the date of the filing of this complaint, there have been 20 lawsuits involving the ’015 Patent in U.S. District Courts. A chart outlining this litigation and its status is included as Ex. 108. The ’015 Patent is also involved in two pending Inter Partes Review proceedings pending before the Patent Trial and Appeal Board (“PTAB”) of the United States Patent and Trademark Office. One was filed by Carqu (IPR2020-00944) on May 14, 2020 and the PTAB has instituted review. The other was filed by Shenzhen Mediatek Tong Technology Co, Ltd. on July 29, 2020; NOCO filed its preliminary response to the petition on December 16, 2020 and the PTAB’s decision on whether or not to institute review is expected by March 2021.

589. There has been no litigation involving the ’024 Patent.

590. As of the date of filing the complaint, there have been thirteen district court actions involving the Asserted Trademarks. *See* Ex. 109. There have been no proceedings before the PTAB.

591. Other than the litigation specified above, to Complainant’s knowledge, the

Asserted Patents and Asserted Trademarks are not and have not been the subject of any current or prior litigation.

XI. GEO

592. A general exclusion order is needed to prevent the circumvention of an order limited to the Proposed Respondents due to the widespread pattern of infringement, as well as the difficulty in identifying the source of the Accused Products. 19 U.S.C. § 1337 (d)(2). This is evidenced by the fact that Accused Products continue to enter the market despite NOCO's aggressive ongoing enforcement measures.

593. Starting in 2014, NOCO began noticing the appearance of the Accused Products in the marketplace. NOCO responded by filing lawsuits against five foreign entities that were offering infringing jump starters on Amazon.com. Since then, NOCO has filed sixteen additional lawsuits, including suits in Canada, the United Kingdom and Germany. As a result of these efforts, NOCO secured a permanent injunction against two of the foreign entities barring them from selling or offering to sell jump starters that infringe NOCO's '015 patent and entered into a settlement agreement with a third foreign entity providing a substantial payment for past damages and a license for future sales. The remaining suits are pending.

594. Despite these efforts, and successful litigation outcomes, NOCO continues to notice new market entrants selling jump starters with the same features as the NOCO Boost® products. NOCO vigilantly monitors Amazon.com listings and works with Amazon to remove listings for infringing products. NOCO estimates that in the past two years, it has had to file hundreds of takedown notices with Amazon. NOCO also filed a lawsuit against numerous defendants, including named Respondents Shenzhen Valuelink, Aukey, Shenzhen Mediatek, Gooloo, Guangzhou Unique Electronics, and Nice Team alleging that these companies, *inter alia*, manipulated Amazon.com algorithms, which determine the product that will receive the

“Amazon’s Choice” Badge, such that defendants’ products would receive the “Amazon’s Choice” Badge instead of NOCO. *See The NOCO Company v. Shenzhen Valuelink E-Commerce Co., Ltd., et al.*, N.D. Ohio, No. 1:20-cv-00049-SO, (Jan. 9, 2020).

595. In pursuit of these enforcement efforts, NOCO has expended significant employee time in addition to legal fees. Through continuous monitoring, NOCO employees identify infringing products or abuse (e.g., manipulation of the Amazon platform) weekly, sometimes daily.

596. In addition to products infringing the Asserted Patents, NOCO regularly sees 1) unauthorized use of NOCO trademarks; 2) unauthorized use of NOCO copyrighted images - in whole, or in part, meaning an entity has slightly modified a NOCO image to use with their product; 3) copying NOCO content with a similar look and stylization. For example, the FCOEnergy website (Ex. 31) uses a photo copied from the NOCO website that includes NOCO- branded jumper cables:

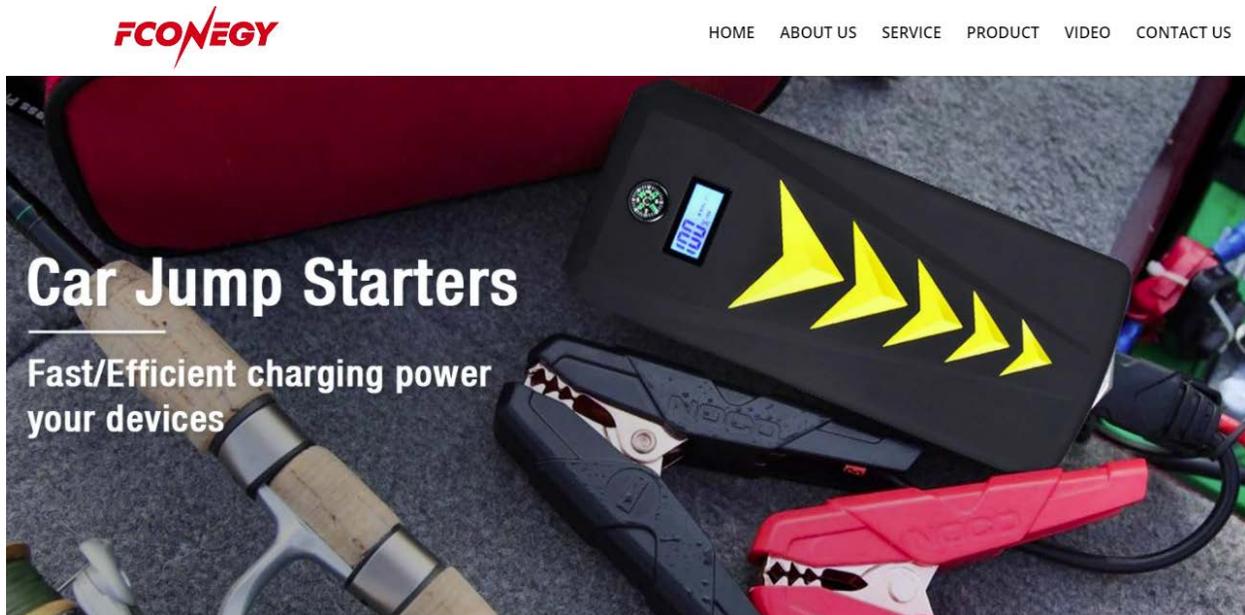


Fig. 6- Excerpt from FCOEnergy website, Ex. 31



Fig. 7- Photo from NOCO Website's HD Boost Battery Clamp Listing (Ex. 110)

597. Notably, NOCO has filed no less than 50 claims of infringement through Amazon Brand Registry for the Asserted Trademark ULTRASAFE.

598. In terms of abuse or manipulation of the Amazon marketplace, NOCO has identified the following types of activities by proposed Respondents or other sellers of the Accused Products: 1) manipulating Amazon organic search ranking; 2) depressing legitimate products organic search ranking; 3) fake positive and negative reviews; 4) false product return claims to

force a product takedown; 5) altering competitive products' browse nodes; 6) manipulating the Amazon Choice badge; and 7) altering NOCO content.

599. Each instance of infringement or abuse is reported to NOCO's Global HQ, at which point it is either submitted to Amazon Brand Registry or becomes the subject of a lawsuit. For some types of infringement, NOCO has elected to stop using Brand Registry after finding that Amazon often simply modifies the listing with the infringing content; NOCO is now filing lawsuits in almost every instance. In 2020, NOCO enrolled in the Amazon SVS Program, at a cost of approximately \$500,000 to help resolve these issues more efficiently. Registering with the SVS Program was critical as the number of infractions and instance of abuse were too high for the category manager assigned to NOCO to assist in resolution. The abuse by NOCO's competitors has become so prevalent that Amazon has placed the NOCO products into multiple exclusive protection programs.

XII. REQUESTED RELIEF

600. Proposed Respondents have infringed and will continue to infringe the Asserted Patents and Asserted Trademarks as specified in Section VI above unless the Commission prohibits the importation into and sale within the United States after importation of the Accused Products.

601. Accordingly, NOCO respectfully requests that the United States International Trade Commission:

a) Institute an immediate investigation pursuant to Section 337(b)(1) of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337, into Proposed Respondents' violations of Section 337 arising from the sale for importation into the United States, importation, and/or sale within the United States after importation of certain portable battery jump starters and components thereof that infringe the Asserted Patents and/or Asserted Trademarks;

b) Schedule and conduct a hearing, pursuant to 19 U.S.C. § 1337 (c), for purposes of receiving evidence and hearing arguments concerning whether Proposed Respondents have violated Section 337 and, following the hearing, determine that Proposed Respondents have violated Section 337;

c) Issue a permanent general exclusion order, pursuant to 19 U.S.C. § 1337(d)(1), excluding from entry into the United States certain portable battery jump starters and components thereof that are imported, sold for importation, or sold after importation that infringe one or more claims of the Asserted Patents and/or Asserted Trademarks, including, without limitation, the specific Accused Products identified in this Complaint and the exhibits hereto; or, in the alternative, issue permanent limited exclusion orders specifically directed to each named Respondent and its subsidiaries, predecessors, affiliates, agents, successors, and assigns, excluding from entry into the United States certain portable battery jump starters and components that infringe one or more claims of the Asserted Patents and/or Asserted Trademarks;

d) Issue permanent orders, pursuant to 19 U.S.C. § 1337(f), directing Proposed Respondents and any of their principals, stockholders, officers, directors, employees, agents, distributors, controlled (whether by stock ownership or otherwise) and majority-owned business entities, successors, and assigns to cease and desist from importing, selling, selling for importation, offering for sale, using, demonstrating, promoting, marketing, and/or advertising in the United States Respondents' portable battery jump starters and components thereof that infringe one or more claims of the Asserted Patents and/or Asserted Trademarks, including, without limitation, the specific Accused Products identified in this Complaint and the exhibits hereto;

e) Impose a bond on importation and sales of infringing products during the 60-day Presidential review period pursuant to 19 U.S.C. § 1337(j); and

f) Grant all such other and further relief as it deems appropriate under the law, based upon the facts complained of herein and as determined by the Investigation.

Dated: January 15, 2020

Respectfully submitted,

/s/ Deanna Tanner Okun
Deanna Tanner Okun
V. James Adduci, II
Lauren E. Peterson
Juan J. Garcia
**ADDUCI, MASTRIANI & SCHAUMBERG,
L.L.P.**
1133 Connecticut Avenue, NW
Washington, DC 20036
Phone: (202) 467-6300
Facsimile: (202) 466-2006
Email: NOCO-001@adduci.com

Michael J. Garvin
VORYS, SATER, SEYMOUR AND PEASE LLP
200 Public Square
Suite 1400
Cleveland, OH 44114-2327
Telephone: (216) 479-6100
Facsimile: (216) 479-6060
Email: mjgarvin@vorys.com

Rex W. Miller, II
VORYS, SATER, SEYMOUR AND PEASE LLP
52 East Gay Street
Columbus, OH 43215
Telephone: (614) 464-6207
Facsimile: (614) 719-4766
Email: rwmill@vorys.com

*Counsel for Complainant The NOCO
Company*

VERIFICATION TO COMPLAINT

I, Jeffrey Weiner, declare, in accordance with 19 C.F.R. §§ 210.4 and 210.12(a) as follows:

1. I am the Chief Financial Officer at The NOCO Company and am duly authorized to sign this Complaint;
2. I have read the Complaint and am aware of its contents;
3. The Complaint is not being presented for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of the investigation or related proceeding;
4. To the best of my knowledge, information, and belief founded upon reasonable inquiry, the claims and other legal contentions in the Complaint are warranted by existing law or by a nonfrivolous argument for the extension, modification, or reversal of existing law or the establishment of new law; and
5. The allegations and other factual contentions made in the Complaint have evidentiary support or are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 15, 2021 in
Glenwillow, Ohio



Jeffrey Weiner
CFO, The NOCO Company