

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

In the Matter Of

**CERTAIN COLLAPSIBLE SOCKETS
FOR MOBILE ELECTRONIC
DEVICES AND COMPONENTS
THEREOF**

Investigation No. 337-TA-_____

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

Complainant

PopSockets LLC
3033 Sterling Circle
Boulder, CO 80301
United States of America
Phone: (303) 223-6922

Counsel for Complainant

Benjamin T. Horton
Ryan N. Phelan
MARSHALL, GERSTEIN & BORUN LLP
233 South Wacker Drive
6300 Willis Tower
Chicago, IL 60606-6357
Phone: (312) 474-6300

Proposed Respondents

Agomax Group Ltd.
Room 1015, Beverley Commercial Centre,
87-105 Chatham Road,
Tsimshatsui, Kowloon, Hong Kong

Guangzhou Xi Xun Electronics Co., Ltd.
A3045 Floor 3, Lingnan Building, NO.25
Xiji Road, Liwan District, Guangzhou,
Guangdong, 510620, China (Mainland)

Shenzhen Chuanghui Industry Co., Ltd.
B19, Lushan Building,
Luohu District, Shenzhen, Guangdong,
China (Mainland)

Shenzhen VVI Electronic Limited
10D, Building A, Shengnawei Area,
Xixiang, Baoan, Shenzhen, Guangdong,
China (Mainland)

Shenzhen Yright Technology Co., Ltd.
515, Xingdahuaifu Building, Xixiang Street,
Baoan District, Shenzhen, Guangdong,
China (Mainland)

Hangzhou Hangkai Technology Co., Ltd.
Room 303, Block 3, Cloud Cube, #10
Liansheng Road, Wuchang Avenue, Yuhang

District, Hangzhou City, Zhejiang Province,
China

Shenzhen Kinsen Technology Co., Limited
1603, 16/F, MetroCity, Buji Street, Longgang
Dist., Shenzhen, Guangdong, 518000, China
(Mainland)

Shenzhen Enruize Technology Co., Ltd.
Room 220, 2/F Zhonglian Mansion, 402
Building, Languang Road, Futian District,
Shenzhen, China

Shenzhen Showerstar Industrial Co., Ltd.
Rm302, XueFeng Industrial Building, No.
1021 of XueGang South Rd, LongGang,
Shenzhen, Guangdong, 518033, China

Shenzhen Lamy Technology Co., Ltd.
Room 407A-C YangNan Building, ChuangYe
Road 2, Baoan District, Shenzhen,
Guangdong, 518101, China

Jiangmen Besnovo Electronics Co., Ltd.
No. 18 Plant, Songyuanju, Dubi Village,
Duruan Town, Pengjiang District, Jiangmen,
Guangdong, China (Mainland)

Shenzhen Belking Electronic Co., Ltd.
8017A, 8/F, Bldg. 4, Seg Science And
Technology Industrial Park, Huaqiang North
Road, Futian District, Shenzhen, Guangdong,
China (Mainland)

Yiwu Wentou Import & Export Co., Ltd.
Floor 8, Northside, No. 201-209, Chengbei
Rd., Choucheng Street, Yiwu, Jinhua,
Zhejiang, China (Mainland)

Shenzhen CEX Electronic Co., Limited
Baoan District, Minzhi Road, Bahishilong,
First Area, Building 104, 1702, Shenzhen,
Guangdong, 518000, China (Mainland)

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Non-Confidential Exhibits

Exhibit Number	Item
1	Certified Copy of U.S. Patent No. 8,560,031
2	Certified Copy of a Certificate of Correction for U.S. Pat. No. 8,560,031
3	Certified Copy of the inventors' assignment regarding U.S. Patent No. 8,560,031
4	Certified Copy of iButtons LLC assignment to PopSockets LLC regarding U.S. Patent No. 8,560,031
5	Reproduction of webpages from Complainant's website at popsockets.com
6	Photographs and images of a representative PopSockets product
7	Claim Chart showing Domestic Industry of a representative PopSockets product for U.S. Patent No. 8,560,031
8	Stephen Henn, CES: Tech Launching Pad, Home To 8 Million Types Of iPod Cases, NPR (Jan. 13, 2012)
9	USA Today names PopSockets "the coolest tech you have to see" at CES (CES 2015).
10	Michael Hsu, How to Turn an iPad and iPhone Into a Dual-Screen Workspace, Wall Street Journal (Aug. 28, 2015).
11	Kate Galliet, How to Make Texting Better for your Body, fitforreallife.com/2016/02/how-to-make-texting-better-for-your-body/ (last visited Mar. 7, 2017).
12	Evidence of Unfair Sale and Importation by Agomax Group Ltd.
13	Evidence of Unfair Sale and Importation by Guangzhou Xi Xun Electronics Co., Ltd.
14	Evidence of Unfair Sale and Importation by Shenzhen Chuanghui Industry Co., Ltd.
15	Evidence of Unfair Sale and Importation by Shenzhen VVI Electronic Limited
16	Evidence of Unfair Sale and Importation by Shenzhen Yright

	Technology Co., Ltd.
17	Evidence of Unfair Sale and Importation by Hangzhou Hangkai Technology Co., Ltd.
18	Evidence of Unfair Sale and Importation by Shenzhen Kinsen Technology Co., Limited
19	Evidence of Unfair Sale and Importation by Shenzhen Enruize Technology Co., Ltd.
20	Evidence of Unfair Sale and Importation by Shenzhen Showerstar Industrial Co., Ltd.
21	Evidence of Unfair Sale and Importation by Shenzhen Lamye Technology Co., Ltd.
22	Evidence of Unfair Sale and Importation by Jiangmen Besnovo Electronics Co., Ltd.
23	Evidence of Unfair Sale and Importation by Shenzhen Belking Electronic Co., Ltd.
24	Evidence of Unfair Sale and Importation by Yiwu Wentou Import & Export Co., Ltd.
25	Evidence of Unfair Sale and Importation by Shenzhen CEX Electronic Co., Limited
26	Declaration of Timothy J. Weber

Confidential Exhibits

Exhibit Number	Item
30	Declaration of David B. Barnett

Physical Exhibits

Exhibit Number	Item
31	Representative sample of Accused Products by Agomax Group Ltd.
32	Representative sample of Accused Products by Guangzhou Xi Xun Electronics Co., Ltd.
33	Representative sample of Accused Products by Shenzhen Chuanghui Industry Co., Ltd.
34	Representative sample of Accused Products by Shenzhen VVI Electronic Limited
35	Representative sample of Accused Products by Shenzhen Yright Technology Co., Ltd.
36	Representative sample of Accused Products by Hangzhou Hangkai Technology Co., Ltd.
37	Representative sample of Accused Products by Shenzhen Kinsen Technology Co., Limited
38	Representative sample of Accused Products by Shenzhen Enruize Technology Co., Ltd.
39	Representative sample of Accused Products by Shenzhen Showerstar Industrial Co., Ltd.
40	Representative sample of Accused Products by Shenzhen Lamye Technology Co., Ltd.
41	Representative sample of Accused Products by Jiangmen Besnovo Electronics Co., Ltd.
42	Representative sample of Accused Products by Shenzhen Belking Electronic Co., Ltd.
43	Representative sample of Accused Products by Yiwu Wentou Import & Export Co., Ltd.
44	Representative sample of Accused Products by Shenzhen CEX Electronic Co., Limited
45	Representative sample of a Collapsible Socket for Mobile Electronic Devices by PopSockets

Infringement Claim Charts

Exhibit Letter	Claim Chart
A	Claim Chart for Claims 9 and 16 of U.S. Patent No. 8,560,031 for Respondent Agomax Group Ltd.
B	Claim Chart for Claims 9 and 16 of U.S. Patent No. 8,560,031 for Respondent Guangzhou Xi Xun Electronics Co., Ltd.
C	Claim Chart for Claims 9 and 16 of U.S. Patent No. 8,560,031 for Respondent Shenzhen Chuanghui Industry Co., Ltd.
D	Claim Chart for Claims 9 and 16 of U.S. Patent No. 8,560,031 for Respondent Shenzhen VVI Electronic Limited
E	Claim Chart for Claims 9 and 16 of U.S. Patent No. 8,560,031 for Respondent Shenzhen Yright Technology Co., Ltd.
F	Claim Chart for Claims 9 and 16 of U.S. Patent No. 8,560,031 for Respondent Hangzhou Hangkai Technology Co., Ltd.
G	Claim Chart for Claims 9 and 16 of U.S. Patent No. 8,560,031 for Respondent Shenzhen Kinsen Technology Co., Limited
H	Claim Chart for Claims 9 and 16 of U.S. Patent No. 8,560,031 for Respondent Shenzhen Enruize Technology Co., Ltd.
I	Claim Chart for Claims 9 and 16 of U.S. Patent No. 8,560,031 for Respondent Shenzhen Showerstar Industrial Co., Ltd.
J	Claim Chart for Claims 9 and 16 of U.S. Patent No. 8,560,031 for Respondent Shenzhen Lamye Technology Co., Ltd.
K	Claim Chart for Claims 9 and 16 of U.S. Patent No. 8,560,031 for Respondent Jiangmen Besnovo Electronics Co., Ltd.
L	Claim Chart for Claims 9 and 16 of U.S. Patent No. 8,560,031 for Respondent Shenzhen Belking Electronic Co., Ltd.
M	Claim Chart for Claims 9 and 16 of U.S. Patent No. 8,560,031 for Respondent Yiwu Wentou Import & Export Co., Ltd.
N	Claim Chart for Claims 9 and 16 of U.S. Patent No. 8,560,031 for Respondent Shenzhen CEX Electronic Co., Limited

Appendices

Appendix Letter	Item
App. A	Certified copy and three additional copies of the prosecution history of U.S. Patent No. 8,560,031
App. B	References cited in the prosecution history of U.S. Patent No. 8,560,031

I. INTRODUCTION

1. This Complaint is filed by PopSockets LLC (“PopSockets” or “Complainant”) pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337, based upon the unlawful sale for importation into the United States, importation into the United States, and/or sale within the United States after importation of certain collapsible sockets for mobile electronic devices and components thereof (the “Accused Products”), which are reflected in Exs. 12-25.

2. The Accused Products infringe PopSockets’ U.S. Patent No. 8,560,031 (“the ’031 Patent”), including at least claims 9-13 and 16-17, under 35 U.S.C. § 271. *See* Exs. A-N (claim charts).

3. The Accused Products are imported into the United States, sold for importation into the United States, and/or sold within the United States after importation, by the proposed Respondents, Agomax Group Ltd.; Guangzhou Xi Xun Electronics Co., Ltd.; Shenzhen Chuanghui Industry Co., Ltd.; Shenzhen VVI Electronic Limited; Shenzhen Yright Technology Co., Ltd.; Hangzhou Hangkai Technology Co., Ltd; Shenzhen Kinsen Technology Co., Limited; Shenzhen Enruize Technology Co., Ltd.; Shenzhen Showerstar Industrial Co., Ltd.; Shenzhen Lamye Technology Co., Ltd.; Jiangmen Besnovo Electronics Co., Ltd.; Shenzhen Belking Electronic Co., Ltd; Yiwu Wentou Import & Export Co., Ltd.; and Shenzhen CEX Electronic Co., Limited (collectively “Respondents”).

4. PopSockets seeks, as relief for the unfair acts of Respondents, an investigation into the Respondents’ violations, a public hearing, a general exclusion order barring from entry into the United States any collapsible sockets for mobile electronic devices and components thereof that infringe one or more claims of the ’031 Patent; a permanent cease and desist order prohibiting the importation, sale, sale for importation, offer for sale, promotion, marketing, advertising, and the soliciting of the sale in the United States by Respondents of products that

infringe one or more claims of the '031 Patent, or in the alternative, if the Commission does not order a general exclusion order, a limited exclusion order barring from entry into the United States Respondents' Accused Products that infringe one or more claims of the '031 Patent; and such other relief as the Commission deems proper.

II. COMPLAINANT

5. Complainant, PopSockets, is a Limited Liability Company organized under the laws of Colorado with its corporate headquarters and principal place of business at 3033 Sterling Circle, Boulder, Colorado 80301.

6. PopSockets designs and develops collapsible sockets for mobile electronic devices that can be attached to mobile devices or mobile device cases, such as mobile phones or mobile phone cases, to transform the mobile device's capabilities for the user. For example, when a portable media player collapsible socket is attached to a mobile device or case, the portable media player collapsible socket may be used as a grip to make holding the mobile device more secure, as a stand to position the mobile device for viewing, or as a cord wrap for wrapping a cord, such as set of headphones, around the portable media player collapsible socket for cord storage and management purposes. The portable media player collapsible socket can also be used to fasten the mobile device to a dashboard or console of an automobile. When not in use, the socket may be collapsed to be out of the way, nearly flush with the portable media player or case. In addition, the PopSockets portable media player collapsible socket allows its customers to customize the collapsible sockets for mobile electronic devices with various graphics and designs. A typical PopSockets product, which represents the article at issue in this complaint, is shown below:



7. Complainant PopSockets is the sole assignee and owner of the '031 Patent that is the subject of this Complaint. The '031 Patent was assigned from the inventors, David B. Barnett and Lawrence E. Carlson to iButtons LLC on January 2012. *See Exhibit 3.* On June 7, 2012, iButtons LLC changed its name to PopSockets LLC. *See Exhibit 4.*

8. The inventive concepts underlying the PopSockets products were developed and patented by David B. Barnett and Lawrence E. Carlson, who are both United States citizens and who both reside in Boulder, Colorado. Mr. Barnett is currently President, CEO, and Managing Director of the Board of PopSockets. PopSockets started as a successful campaign via the Kickstarter crowd-funding platform and went live in 2014. Since that time, PopSockets' sales have grown exponentially. PopSockets currently sells over 120 different types of decorative designs for its collapsible sockets for mobile electronic devices, each of which can be customized with various base and accordion colors.

9. PopSockets invests heavily in bringing distinctive and innovative products that fit consumers' needs for design and utility. As a result, PopSockets products have won several awards and received praise from various recognizable sources, including:

- From the National Public Radio (NPR) in 2012 (*see Ex. 8*) (NPR Article)
- From WIRED as recipient of the WIRED Fueling Innovation content sponsored by Mercedes-Benz in 2013

- From USA Today mentioning PopSockets at the 2015 Consumer Electronics Show (CES) (*see* Ex. 9) (CES Article)
- From the Wall Street Journal identifying PopSockets as the “best” compact “smartphone support” accessory in 2015 (*see* Ex. 10) (WSJ Article)
- From Kate Galliet as recipient of the “Fit For Real Life Seal of Approval” in 2016. (*see* Ex. 11) (Galliet Article)

10. The PopSockets product embodies the inventive concepts of the '031 Patent. For example, each PopSockets product comprises a socket for attaching to a portable media player or to a portable media player case. The socket comprises a securing element for attaching the socket to the back of the portable media player or portable media player case, and an accordion forming a tapered shape capable of extending outward generally from the portable media player and retracting back toward the portable media player by collapsing generally along its axis. The socket also comprises a foot disposed at the distal end of the accordion. Consequently, the various designs and implementations of the PopSockets product embody the inventive aspects of the '031 Patent. *See* Ex. 7.

III. RESPONDENTS

11. Each of the Respondents sell the Accused Products for importation into the United States, import the Accused Products into the United States, and/or sell the Accused Products after importation in the United States, using online e-commerce websites, such as, for example, Alibaba.com and eBay.com. Each of the Respondents uses such online e-commerce websites to obscure their identities and avoid intellectual property rights. The below provides a listing of currently identified Respondents. Many of the named Respondents identify addresses on their online webpages that are different from the return addresses on their respective shipping and/or customs labels of the collapsible sockets for mobile electronic devices imported to the United States. In many cases, the named Respondents identify or associate themselves with different names or different entities, and several of the addresses are inconsistent, incomplete, or

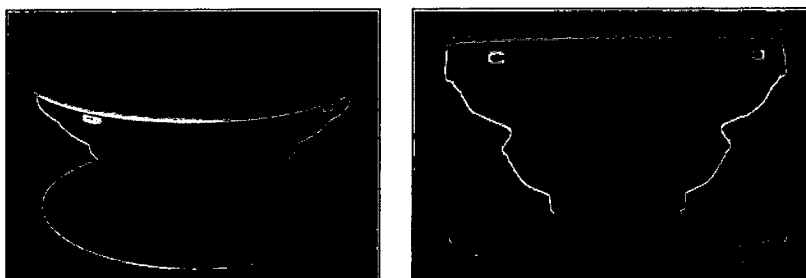
unintelligible, as shown below. Additional information regarding the sale for importation of the Accused Products into the United States, importation of the Accused Products into the United States, and/or sell of the Accused Products after importation in the United States may be found in the Declaration of Timothy J. Weber. *Id.*

12. Proposed Respondent Agomax Group Ltd. is a foreign company having a primary address of Room 1015, Beverley Commercial Centre, 87-105 Chatham Road, Tsimshatsui, Kowloon, Hong Kong. The primary address was identified as linked from a webpage offering for sale for importation into the United States Respondent's accused product(s) as identified herein. Agomax Group Ltd. is associated with and/or ships products into the United States from the following additional address(es) and/or entity(s): (1) 2F, Building B, No.33, Ji Xiang 2nd Road, Xiang Yuan New Village, Ping Di Street, Long Gang Zone, Shenzhen, China; (2) Tracy, 075525185443, (ALI) FLAT 14L, HUA DU YUAN BUI, 518001 Shenzhen Guang, People's Republic of China. See an example of an Accused Product sold by Agomax Group Ltd. for importation and imported into the United States below:



13. Proposed Respondent Guangzhou Xi Xun Electronics Co., Ltd. is a foreign company having a primary address of A3045 Floor 3, Lingnan Building, NO.25 Xiji Road, Liwan District, Guangzhou, Guangdong, 510620, China (Mainland). The primary address was identified as linked from a webpage offering for sale for importation into the United States Respondent's accused product(s) as identified herein. Guangzhou Xi Xun Electronics Co., Ltd.

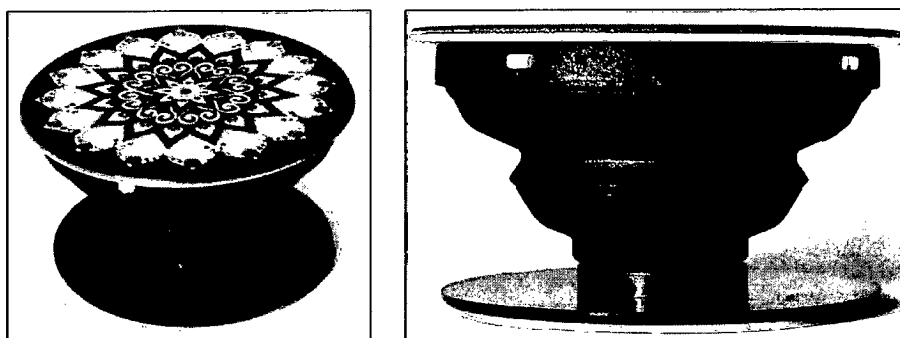
is associated with and/or ships products into the United States from the following additional address(es), names, or entity(s): (1) A3045, Floor 3, Lingnan Electric City, No. 25, Xinji Road, Liwan District, Guangzhou, Guangdong, China; (2) Litian “Interonal [*sic*]” Trade Co. Ltd., Room 1601 1602 16/F DongShan, Plaza No 69 Xianliezhong Road, Hong Kong, HK 999077. See an example of an Accused Product sold by Guangzhou Xi Xun Electronics Co., Ltd. for importation and imported into the United States below:



14. Proposed Respondent Shenzhen Chuanghui Industry Co., Ltd. is a foreign company having a primary address of B19, Lushan Building, Luohu District, Shenzhen, Guangdong, China (Mainland). The primary address was identified as linked from a webpage offering for sale for importation into the United States Respondent’s accused product(s) as identified herein. Shenzhen Chuanghui Industry Co., Ltd. is associated with and/or ships products into the United States from the following additional address(es), names, or entity(s): Tan Zhi Co. Ltd., Mr. Hui, Guang Tai Lu Nan Cheng, Shi Gu Huang Jin Lu, IF RTO, PLS RTN TO HKG FOR SHPR INST, HONG KONG, HONG KONG. See an example of an Accused Product sold by Shenzhen Chuanghui Industry Co., Ltd. for importation and imported into the United States below:

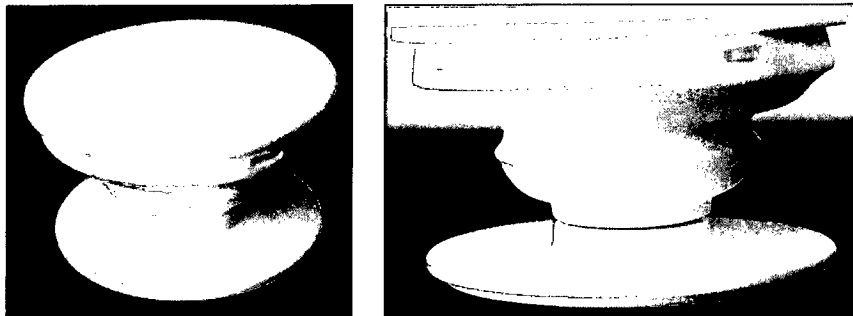


15. Proposed Respondent Shenzhen VVI Electronic Limited is a foreign company having a primary address of 10D, Building A, Shengnawei Area, Xixiang, Baoan, Shenzhen, Guangdong, China (Mainland). The primary address was identified as linked from a webpage offering for sale for importation into the United States Respondent's accused product(s) as identified herein. Shenzhen VVI Electronic Limited is associated with and/or ships products into the United States from the following additional address(es), names, or entity(s): (1) 12/F, Building B1, Rongtaiyuan, Shajing town, Baoan district, Shenzhen, Guangdong, 518102 China (Mainland); (2) AA, AA, Room 909 Longxing Songyu Rd, Songgang, SHENZHEN Shi GUANGDONG 518100, CHINA. See an example of an Accused Product sold by Shenzhen VVI Electronic Limited for importation and imported into the United States below:



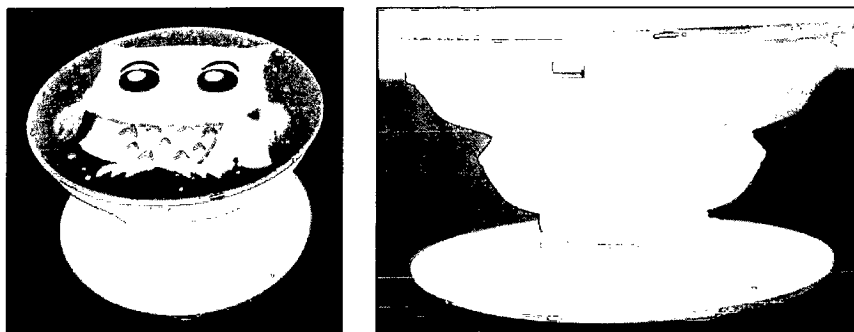
16. Proposed Respondent Shenzhen Yright Technology Co., Ltd. is a foreign company having a primary address of 515, Xingdahua fu Building, Xixiang Street, Baoan District, Shenzhen, Guangdong, China (Mainland). The primary address was identified as linked from a webpage offering for sale for importation into the United States Respondent's accused

product(s) as identified herein. Shenzhen Yright Technology Co., Ltd. is associated with and/or ships products into the United States from the following additional address(es), names, or entity(s): (1) Lam Shen International Trade Co. Ltd., Sally G, No. 6 On 6/FI., Block 2, Golden Ind. Bldg, 16-26 Kwai Tak St., Kwai Chung, Hong Kong; (2) Taoyuanju, Xixiang Street, Baoan District, Shenzhen, Guangdong, 518126, China (Mainland). See an example of an Accused Product sold by Shenzhen Yright Technology Co., Ltd. for importation and imported into the United States below:

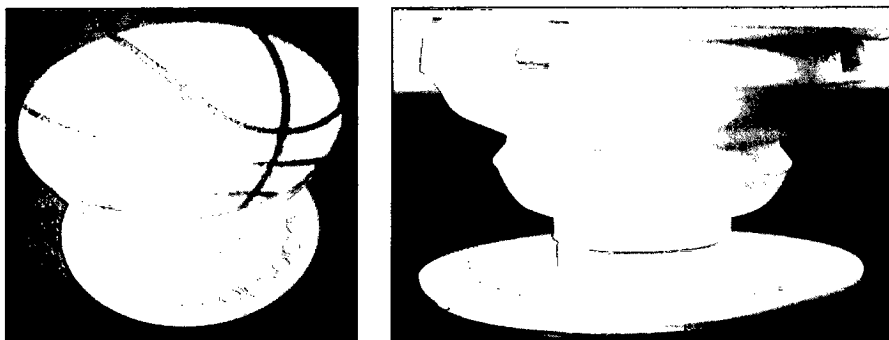


17. Proposed Respondent Hangzhou Hangkai Technology Co., Ltd. is a foreign company having a primary address of Room 303, Block 3, , Cloud Cube # 10 Liansheng Road, Wuchang Avenue, Yuhang District, Hangzhou City, Zhejiang Province, China. The primary address was identified on Respondent's product packaging of the accused product as imported into the United States and as identified herein. Hangzhou Hangkai Technology Co., Ltd. is associated with and/or ships products into the United States from the following additional address(es), names, or entity(s): (1) Room 517, 4th Building, Xixi Feng Shang, 499 Wen San West Rd., West Lake District, Hangzhou, Zhejiang, China (Mainland) (2) xu sihang, Room 503, Huake Xixihui Block 2 door 3, #10 Liansheng Rd, HANGZHOU, YUZHANG, ZHEJIANG, China, 310023; (3) Room 503, Block 3, 2nd Bldg., No. 10, Liansheng Road, Wuchang Street, Yuhang Area, Hangzhou, Zhejiang, China (Mainland); (4) "Sikai Case"; (5) "Sikai"; (6)

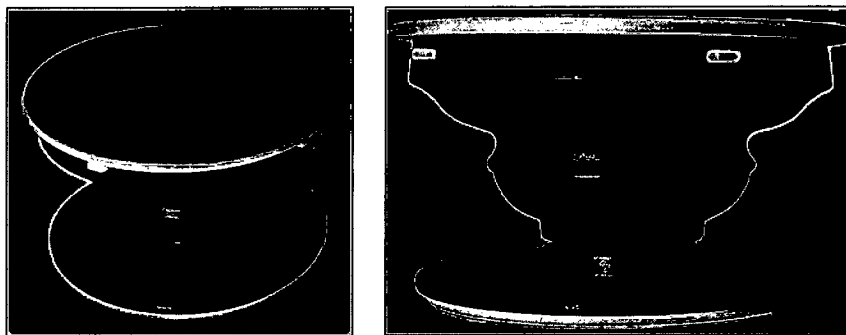
“sikai2011.” See an example of an Accused Product sold by Hangzhou Hangkai Technology Co., Ltd. for importation and imported into the United States below:



18. Proposed Respondent Shenzhen Kinsen Technology Co., Limited is a foreign company having a primary address of 1603, 16/F, Metro City, Buji Street, Longgang Dist., Shenzhen, Guangdong, 518000, China (Mainland). The primary address was identified as linked from a webpage offering for sale for importation into the United States Respondent’s accused product(s) as identified herein. Shenzhen Kinsen Technology Co., Limited is associated with and/or ships products into the United States from the following additional address(es), names, or entity(s): (1) B206, Xiliang Jialong Apartment Area, Erjie Rd., Bayue, Buji, Longgang Dist., Shenzhen, Guangdong, China (Mainland); (2) Huwang Technology Co. Limited, Vinda Manager-LH-A6, Room X 1204 Huayi Science Technology Building, Shenzhen, China. See an example of an Accused Product sold by Shenzhen Kinsen Technology Co., Limited for importation and imported into the United States below:

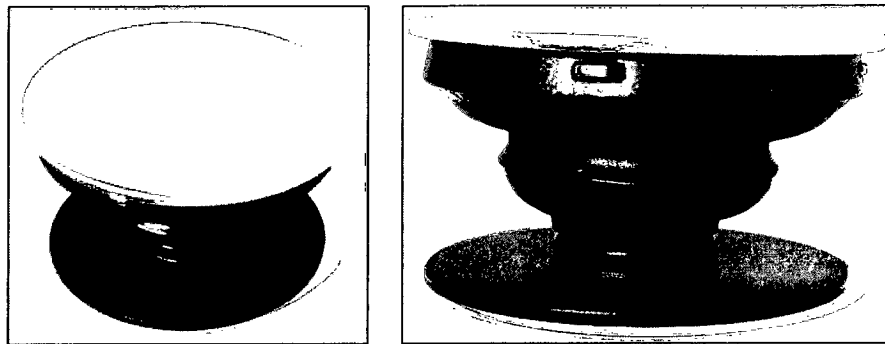


19. Proposed Respondent Shenzhen Enruize Technology Co., Ltd. is a foreign company having a primary address of Room 220, 2/F Zhonglian Mansion, 402 Building, Languang Road, Futian District, Shenzhen, China. The primary address was identified as linked from a webpage offering for sale for importation into the United States Respondent's accused product(s) as identified herein. Shenzhen Enruize Technology Co., Ltd. is associated with and/or ships products into the United States from the following additional address(es), names, or entity(s): (1) Jun Guo Guo, Jun Guo Guo, RM B427 BaohuaHua Yuan Gardem, Fanshen 72th District Bao An, IF RTO, PLS RTN TO HKG FOR SHPR INST, HONG KONG, HONG KONG; (2) 1/Floor, Building 2, No. 6 of Donglian Industry Zone, Jinsa Community, Pingshan New Area, Shenzhen, China; (3) "G&T Technology Co., Ltd." See an example of an Accused Product sold by Shenzhen Enruize Technology Co., Ltd. for importation and imported into the United States below:

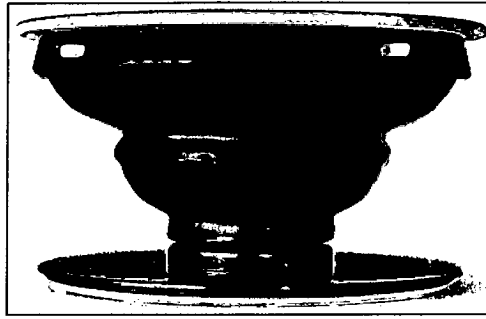
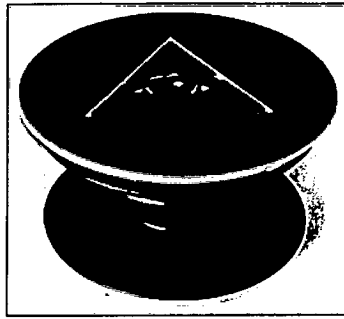


20. Proposed Respondent Shenzhen Showerstar Industrial Co., Ltd. is a foreign company having a primary address of Rm302, XueFeng Industrial Building, No. 1021 of XueGang South Rd, LongGang, Shenzhen, Guangdong, 518033, China. The primary address was identified as linked from a webpage offering for sale for importation into the United States Respondent's accused product(s) as identified herein. Shenzhen Showerstar Industrial Co., Ltd. is associated with and/or ships products into the United States from the following additional

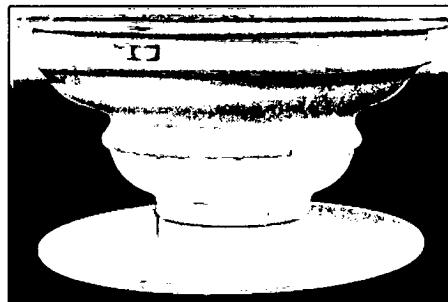
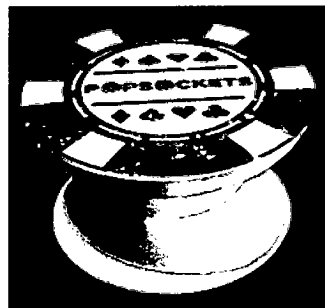
address(es), names, or entity(s): (1) Miaohaigou Xx01, Tony, 101 Alps Avenue #01-01, Singapore 498793, 339156 Singapore, Singapore; (2) 3rd floor, Fenghua Industrial Building 5, Xuegang South Road No. 1021, Bantian Street, Longgang District, Shenzhen, China; (3) B-816, Xinghe Shiji Bldg., 3069, Caitian Road, Gangxia, Futian, Shenzhen, Guangdong, China (Mainland). See an example of an Accused Product sold by Shenzhen Showerstar Industrial Co., Ltd. for importation and imported into the United States below:



21. Proposed Respondent Shenzhen Lamye Technology Co., Ltd. is a foreign company having a primary address of Room 407A-C YangNan Building, ChuangYe Road 2, Baoan District, Shenzhen, Guangdong, 518101, China. The primary address was identified as linked from a webpage offering for sale for importation into the United States Respondent's accused product(s) as identified herein. Shenzhen Lamye Technology Co., Ltd. is associated with and/or ships products into the United States from the following additional address(es), names, or entity(s): Lingspect Technology Hk Compan, H Ricki-66822 C/O Data Express, Gzx No 2 Yintian Road, Xixiang Town Baoan, Shenzhen China, Hongkong Hkg, Hongkong. See an example of an Accused Product sold by Shenzhen Lamye Technology Co., Ltd. for importation and imported into the United States below:

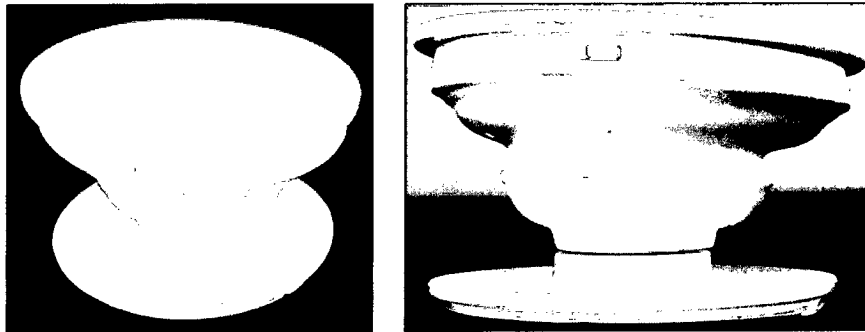


22. Proposed Respondent Jiangmen Besnovo Electronics Co., Ltd. is a foreign company having a primary address of No. 18 Plant, Songyuanju, Dubi Village, Duruan Town, Pengjiang District, Jiangmen, Guangdong, China (Mainland). The primary address was identified as linked from a webpage offering for sale for importation into the United States Respondent's accused product(s) as identified herein. Jiangmen Besnovo Electronics Co., Ltd. is associated with and/or ships products into the United States from the following additional address(es), names, or entity(s): (1) Ees Supply Chain(Hk)Co. Ltd., Ryan, Unit 9 22/F, Cre Centre 889 Cheung Sha Wan Road, Cheung Sha Wan, Kowloon, Hong Kong; (2) NO. 18 Songyuanzui Industrial Park, Duran Town, Jiangmen City, Guangdong, 529000, China (Mainland); (3) "MaxMio." See an example of an Accused Product sold by Jiangmen Besnovo Electronics Co., Ltd. for importation and imported into the United States below:



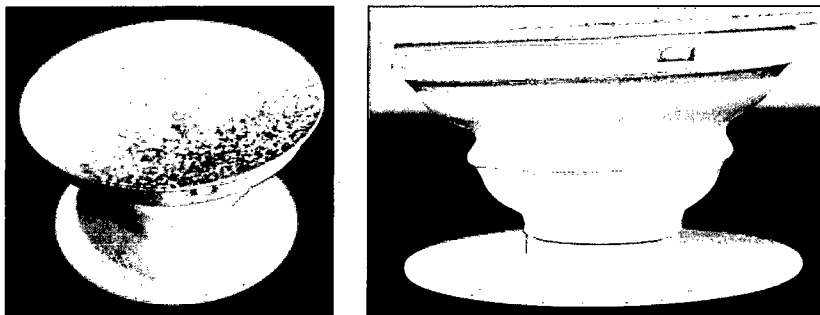
23. Proposed Respondent Shenzhen Belking Electronic Co., Ltd. is a foreign company having a primary address of 8017A, 8/F, Bldg. 4, Seg Science And Technology Industrial Park, Huaqiang North Road, Futian District, Shenzhen, Guangdong, China (Mainland).

The primary address was identified as linked from a webpage offering for sale for importation into the United States Respondent's accused product(s) as identified herein. Shenzhen Belking Electronic Co., Ltd. is associated with and/or ships products into the United States from the following additional address(es), names, or entity(s): (1) Shenzhen Dongyuan Tech Co. Ltd., Mr Band C/O Leadon, Flat 1 No. 3 Bldg. Fuzhong Ind, Xiashiwei Rd, Fuyong Town, Baoan Shenzhen, Hong Kong, Hong Kong; (2) Huaqlang Road, Shenzhen, Guangdong, 518000, China (Mainland). See an example of an Accused Product sold by Shenzhen Belking Electronic Co., Ltd. for importation and imported into the United States below:

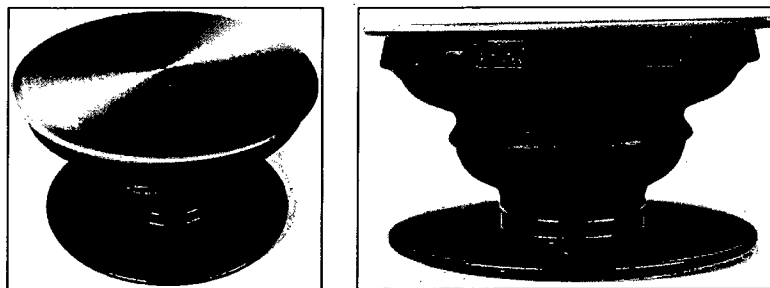


24. Proposed Respondent Yiwu Wentou Import & Export Co., Ltd. is a foreign company having a primary address of Floor 8, Northside, No. 201-209, Chengbei Rd., Choucheng Street, Yiwu, Jinhua, Zhejiang, China (Mainland). The primary address was identified as linked from a webpage offering for sale for importation into the United States Respondent's accused product(s) as identified herein. Yiwu Wentou Import & Export Co., Ltd. is associated with and/or ships products into the United States from the following additional address(es), names, or entity(s): (1) Quzhou And Import Export Trade Co.-Ltd./Liu Yijun, No 16 Xingwei Road, Fuyong Town Shenzhen, IF RTO, PLS RTN TO HKG FOR SHPR INST, HONG KONG, HONG KONG; (2); F/8, No. 201-209, Chengbei Rd, Yiwu China, Yiwu City, Zhejiang, 322000, China (Mainland) (3) Yao Wei Xing, Quzhou and Import & Export Trade Co.

Ltd, 1-6 of three stores, 89 building, Chunhan Beiyuan, YiWu. See an example of an Accused Product sold by Yiwu Wentou Import & Export Co., Ltd. for importation and imported into the United States below:



25. Proposed Respondent Shenzhen CEX Electronic Co., Limited is a foreign company having a primary address of Baoan District, Minzhi Road, Bahishilong, First Area, Building 104, 1702, Shenzhen, Guangdong, 518000, China (Mainland). The primary address was identified as linked from a webpage offering for sale for importation into the United States Respondent's accused product(s) as identified herein. Shenzhen CEX Electronic Co., Limited is associated with and/or ships products into the United States from the following additional address(es), names, or entity(s): (1) 6B68, 6th Floor, East 3rd Block, Seg Technology Park, North Huaqiang, Futian District, Shenzhen, Guangdong, China (Mainland); (2) Sinotrans, 86-18126419295, Sinotrans, Floor 1 C Warehouse, Buchong, 518104 Shenzhen Szx, China, People's Republic Of; (3) 1702, Building 104, Baishilong First Area, Minzhi Street, Baoan District, Shenzhen, Guangdong, China (Mainland). See an example of an Accused Product sold by Shenzhen CEX Electronic Co., Limited for importation and imported into the United States below:



IV. THE TECHNOLOGY AND PRODUCTS AT ISSUE

26. Consumers use portable media players, such as mobile smart phones and tablet computers, in a variety of contexts—from home, in their vehicles, and when on the move. Accordingly, a need arose to assist consumers to more easily manipulate, or otherwise use, their respective portable media players on-the-go or in a more convenient fashion than otherwise provided by their portable media players alone. In order to meet these needs, PopSockets developed the innovative PopSockets line of products.

27. The PopSockets product has been described as “cool” and useful products for everyday consumer use. *See, e.g.*, Exs. 8 (NPR Article) and 11 (Galliett Article). In fact, The Wall Street Journal called the PopSockets product the “best” compact smartphone accessory available for addressing a variety of consumer needs. *See, e.g.*, Ex. 10 (WSJ Article).

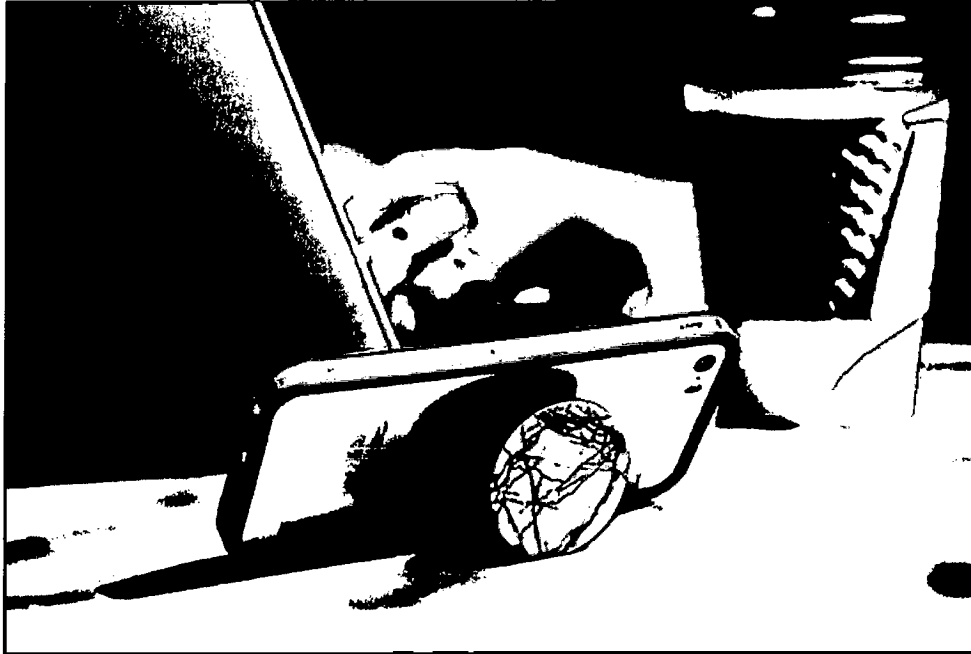
28. Nontechnical description:¹ The patented PopSockets product has a bottom surface for adhering to the back of a mobile media device or device case, such as an iPhone or iPhone case, and a top surface. The top and bottom surfaces are connected by a collapsible accordion-type element. The top surface is nearly flush to the iPhone or iPhone case when the accordion-type element is collapsed. The top surface pops up when expanded, and when expanded can be tilted at different angles and in different directions.

¹ As required by 19 C.F.R. § 210.12(a)(9)(vi), Complainant provides this nontechnical description. This section provides a non-technical description of the '031 Patent that is for descriptive purposes only and does not limit or expand the scope of its claims.

29. PopSockets product features allow the PopSockets product to be used in a variety of applications, for example, as shown in Complainant's images as reproduced below from Complainant's website (popsockets.com). *See* Ex. 4. In one example application, as shown below, consumers can use a PopSockets product as a grip for taking pictures, including "selfies," or to ease a consumer's texting, scrolling, or other common portable media player device uses:



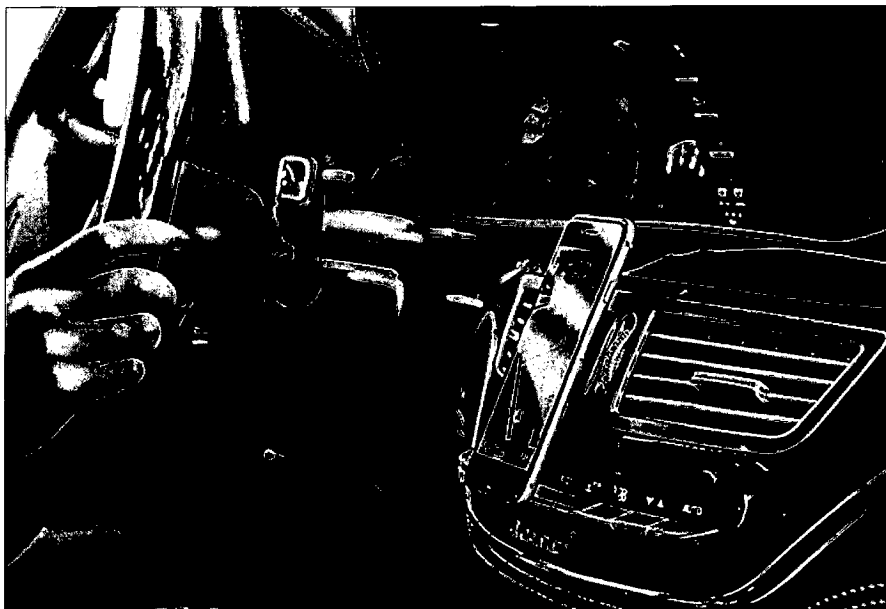
30. In another example application, as depicted below, consumers may use a PopSockets product as a stand to position the mobile device for convenient viewing on a surface, such as a table surface:



31. In another example application, as depicted below, consumers may use one or more PopSockets product(s) for cord management purposes, such as to wrap up a set of headphones or power cord:



32. In another example application, as depicted below, consumers may use a PopSockets product to fasten a mobile device to a dashboard or console of an automobile:



33. The PopSockets products are also customizable, and that customization is largely achieved through assembly and graphic design in the United States. For example, as shown in Exhibit 5 and as described in Ex. 30 (Barnett Decl.), a consumer may access the PopSockets website (popsockets.com) and choose from over one hundred decorative designs and select dozens of different color schemes, which provide consumers with thousands of decorative combinations of PopSockets products. In addition, users can upload graphics or images, such as a customized graphic or logo, for customization of the top portion of the PopSockets products making the total number of design combinations limitless. Those color choices and graphics selections or uploads are handled by PopSockets employees via assembly and graphic design in the United States, making the customization process a domestic one. *See* Ex. 30.

34. Various entities, including at least the identified Respondents, have either copied or made approximate facsimiles of the PopSockets products, all of which mimic and infringe the inventive concepts and features of the PopSockets products and, in many cases, are near-

identical replicas differentiated only by low quality materials and sub-standard manufacturing. Additionally, Respondents typically sell the Accused Products for a fraction of PopSockets' retail price, under various names, and typically advertise, offer for sale, and sell the Accused Products using common online e-commerce platforms, such as Alibaba.com and eBay.com, that allow them to obscure their identities, disregard intellectual property rights, and bypass the need to work with and sell to legitimate United States companies.

35. An exhibit for each identified Respondent has been prepared that details at least one of respective Respondents' online e-commerce webpages, Accused Products from the Respondents' online e-commerce webpages, photographs of the Accused Products and related packaging as imported into the United States, and shipping labels, custom labels, etc., for the respective Accused Products. *See* Exhibits 11-24.

V. HARMONIZED TARIFF SCHEDULE INFORMATION

36. On information and belief, the tariff classification which may cover importation of the Accused Products is No. 3926.90.25 of the Harmonized Tariff Schedule ("HTS") of the United States. This HTS number is intended for illustration only and is not intended to be restrictive of the category of Accused Products.

VI. U.S. PATENT NO. 8,560,031

37. The '031 Patent was filed on February 23, 2012, and claims priority to U.S. Provisional Patent Application No. 61/453,375, filed on March 16, 2011. The '031 Patent issued on October 15, 2013. The '031 Patent is currently assigned to PopSockets LLC, and lists named inventors David B. Barnett and Lawrence E. Carlson, both of Boulder, Colorado. *See* Exs. 1, 3, and 4.

38. The '031 Patent describes and claims a socket for attaching to a portable media player or to a portable media player case. The figure below depicts an exemplary embodiment of the claimed socket attached to a portable media player case:

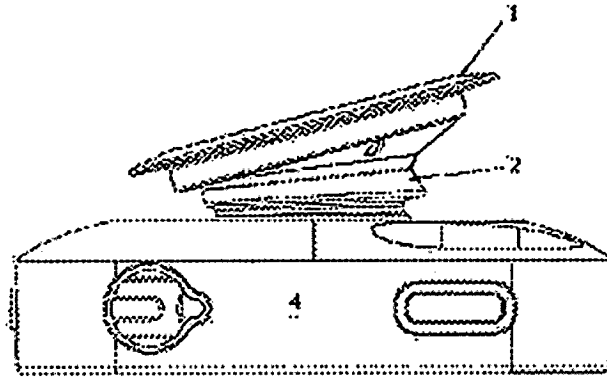


Figure 9

Ex. 1, Figure 9.

39. Figure 9 shows an embodiment of a socket attached to a portable media player case 4. In the embodiment of Figure 9, the socket includes a button 1 and an accordion 2 that is connected to the portable media player case. *See, e.g.*, Ex. 1 at 4:37-43; 6:44-48.

40. Figure 7 is an isometric side view of an embodiment of the portable media player case and socket, depicting the same items 1, 2, and 4:

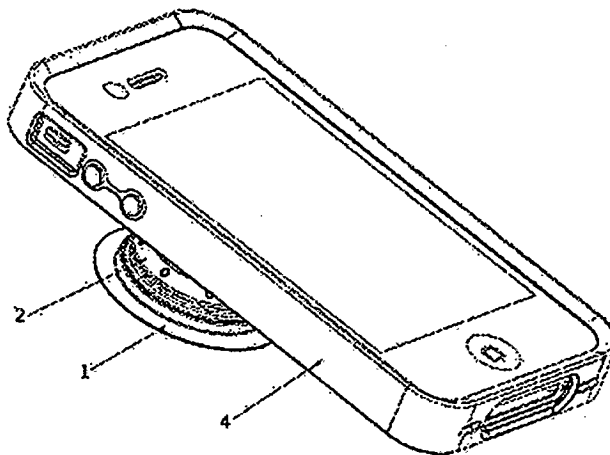


Figure 7

Ex. 1, Figure 7.

41. The '031 Patent has 22 claims. Claims 1, 9, 16, and 22 are independent claims, and claims 2-8, 10-15, and 17-21 are dependent claims. Claim 9 of the '031 Patent is representative of the claims-at-issue in this Complaint:

9. *A socket for attaching to a portable media player or to a portable media player case, comprising:
a securing element for attaching the socket to the back of the portable media player or portable media player case; and
an accordion forming a tapered shape connected to the securing element, the accordion capable of extending outward generally along its axis from the portable media player and retracting back toward the portable media player by collapsing generally along its axis; and
a foot disposed at the distal end of the accordion.*

Id., claim 9.

42. Pursuant to Commission Rule 210.12(a)(9)(i) and (ii), this Complaint is accompanied by a certified copy of the '031 Patent and its Certificate of Correction (*see* Exhibits 1 and 2) and certified copies of each assignment of the '031 Patent (*see* Exhibits 3 and 4). Additionally, Appendix A contains a certified copy and three additional copies of the prosecution history of the '031 Patent. *See* 19 C.F.R. § 210.12 (c)(1). Appendix B includes four copies of each patent and/or publication mentioned in the prosecution history of the '031 Patent; there are no non-patent technical references cited in the '031 Patent prosecution history. *See* 19 C.F.R. § 210.12(c)(2).²

43. In accordance with Commission Rule 210.12(a)(9)(v), below is a list of each foreign patent and each foreign patent application (not already issued as a patent) corresponding

² U.S. Pub. No. "2008/1268916" is mentioned in the prosecution history, but is not identifiable in the USPTO's records, for example, at uspto.gov. Complainant believes the publication number contains a typographical error. Complainant believes that the correct publication number is instead "2008/0268916," and has submitted as part of App. B, U.S. Pub. No. 2008/0268916, which has the same identified inventor ("Lin") and Publication Date (2008-10-30") as mentioned in the prosecution history.

to the '031 Patent, with an indication of the prosecution status of each such patent application.

None of PopSockets' foreign patent applications have been denied, abandoned or withdrawn.

LIST OF CORRESPONDING FOREIGN PATENTS AND APPLICATIONS		
Description and Patent or Appl. No.	Country	Status
Extending socket for portable media player – 2828357	CA	Pending
Extending socket for portable media player – 201280013708.X	CN	Pending
Extending socket for portable media player – 12716127.1	EP	Pending
Extending socket for portable media player – 1594/MUMNP/2013	IN	Pending
Extending socket for portable media player – 2013-558130	JP	Pending

VII. UNLAWFUL AND UNFAIR ACTS OF THE RESPONDENTS

44. Respondents have either directly copied or made replicas of the PopSockets products, all of which mimic the inventive concepts and features of the PopSockets products. At the time of this Complaint, Respondents' infringement has reached an epidemic level, with Respondents' collective manufacturing capacity exceeding hundreds of thousands of infringing products each week.

45. Respondents collectively identify their capacity for manufacturing the accused products in *millions* of accused products *per month*. For example, Respondent Shenzhen Chuanghui Industry Co., Ltd. specifies on its webpage that it can produce "100000 Piece/Pieces per Month." *See* Ex. 14 at p.1. Similarly, Respondent Shenzhen Yright Technology Co., Ltd. specifies on its webpage that it can produce "20000 Piece/Pieces per Day." *See* Ex. 16 at p.1. And Respondent Shenzhen Enruize Technology Co., Ltd. likewise specifies on its webpage that it can produce "10000 Piece/Pieces per Day." *See* Ex. 19 at p.1. Additionally, Respondent Shenzhen Showerstar Industrial Co., Ltd. specifies on its webpage that it can produce "200000

Piece/Pieces per Day” and that the “supply ability is growing.” *See* Ex. 20 at p.1. Additionally, Respondent Shenzhen Lamye Technology Co., Ltd., specifies on its webpage that it can produce “1000000 Piece/Pieces per Week.” *See* Ex. 21 at p.1. Respondent Jiangmen Besnovo Electronics Co., Ltd., specifies on its webpage that it can produce “5000000 Piece/Pieces per Month.” *See* Ex. 21 at p.1.

46. Respondents import and sell the Accused Products that directly infringe at least claims 9-13 and 16-17 of the '031 Patent. In addition, Respondents' actions induce infringement of at least claims 16 and 17 of the '031 Patent. *See* Exs. A – N (claim charts). Pursuant to Commission Rule 210.12(a)(9)(viii), claim charts that apply claims of the '031 Patent to a representative involved article of each of the Respondents are attached hereto as Exhibits A – N (claim charts), each showing a violation of 35 U.S.C. §§ 271(a) & (b). Respondents are aware of the '031 Patent at least from the date of this Complaint.

47. The chart below provides a listing of the Respondents, corresponding Exhibits A–N for each related claim chart, and related exhibits containing additional photographs of representative samples of the Accused Products, as well as proof of sale for importation into the United States, importation into the United States, and/or sale within the United States after importation by Respondents:

INFRINGEMENT CHARTS AND IMPORTATION EXHIBITS		
Respondent	Claim Chart Exhibit	Related Exhibit
Agomax Group Ltd.	A	12
Guangzhou Xi Xun Electronics Co., Ltd.	B	13
Shenzhen Chuanghui Industry Co., Ltd.	C	14
Shenzhen VVI Electronic Limited	D	15

Shenzhen Yright Technology Co., Ltd.	E	16
Hangzhou Hangkai Technology Co., Ltd.	F	17
Shenzhen Kinsen Technology Co., Limited	G	18
Shenzhen Enruize Technology Co., Ltd.	H	19
Shenzhen Showerstar Industrial Co., Ltd.	I	20
Shenzhen Lamy Technology Co., Ltd.	J	21
Jiangmen Besnovo Electronics Co., Ltd.	K	22
Shenzhen Belking Electronic Co., Ltd.	L	23
Yiwu Wentou Import & Export Co., Ltd.	M	24
Shenzhen CEX Electronic Co., Limited	N	25

48. Further investigation and discovery will likely reveal additional products that infringe one or more claims of the '031 Patent, are sold for importation into the United States, imported into the United States, and/or sold within the United States after importation by Respondents.

VIII. SPECIFIC INSTANCES OF IMPORTATION AND SALE

49. Respondents sell the Accused Products for importation into the United States, import the Accused Products into the United States, and/or sell the Accused Products within the United States after importation. Each of the specific instances of importation and sale of the respective Accused Products as provided herein is a representative example of the unlawful importation of the infringing Accused Products.

50. As described in the Declaration of Timothy J. Weber (*see* Ex. 26), representative samples of each of the Accused Products were purchased after identification on Respondent's webpage as hosted on e-commerce websites such as Alibaba.com and eBay.com, which offer the Accused Products for sale for importation into the United States. For convenience, the chart below provides the name of each identified Respondent, the paragraph(s) of Exhibit 26 (Weber Decl.) corresponding to sale for importation into the United States, importation into the United States, and the related exhibit demonstrating importation, which include Exhibits 12-25. Each of these exhibits indicates that the Accused Product will be shipped from China; a shipping label that indicates that the Accused Product was shipped from China; product packaging that indicates that the Accused Product was "Made in China"; a sales invoice that indicates that the Accused Product was shipped from China; and/or a customs label that indicates that the Accused Product was shipped from China.

EVIDENCE OF IMPORTATION			
Respondent	Weber Decl. Paragraph(s)	Related Exhibit	Physical Exhibit
Agomax Group Ltd.	3	12	31
Guangzhou Xi Xun Electronics Co., Ltd.	4	13	32
Shenzhen Chuanghui Industry Co., Ltd.	5	14	33
Shenzhen VVI Electronic Limited	6	15	34
Shenzhen Yright Technology Co., Ltd.	7	16	35
Hangzhou Hangkai Technology Co., Ltd.	8	17	36
Shenzhen Kinsen Technology Co., Limited	9	18	37
Shenzhen Enruize	10-11	19	38

Technology Co., Ltd.			
Shenzhen Showerstar Industrial Co., Ltd.	12	20	39
Shenzhen Lamy Technology Co., Ltd.	13	21	40
Jiangmen Besnovo Electronics Co., Ltd.	14	22	41
Shenzhen Belking Electronic Co., Ltd.	15	23	42
Yiwu Wentou Import & Export Co., Ltd.	16	24	43
Shenzhen CEX Electronic Co., Limited	17	25	44

51. Representative samples of the Accused Products are submitted with this Complaint as Physical Exhibits 31 through 44.

IX. THE DOMESTIC INDUSTRY

52. In accordance with Section 337(a)(2)-(3), an industry in the United States exists for products protected by the '031 Patent. PopSockets has made significant investments in its facilities, plant, and equipment, significant employment of labor and capital, and significant investments in its exploitation of the '031 Patent in the United States, including engineering, research and development, technical and customer support, and marketing. These investments are all tied to the '031 Patent. Confidential Exhibit 30 (Barnett Decl.) is a declaration regarding PopSockets' domestic industry, detailing PopSockets' investments.

53. Technical Prong: PopSockets products, which are designed, developed, assembled, sold, and supported in the United States, practice at least the asserted claims of the '031 Patent. Exhibit 6 is a claim chart demonstrating that the PopSockets products practice at least independent claims 9 and 16 of the '031 Patent. Advertisements, photographs of representative samples, photographs of outside packaging, and product inserts of the PopSockets

products, as designed, developed, engineered, and provided by PopSockets, are submitted with this Complaint as Exhibits 5 and 6.

54. Economic Prong: PopSockets is a Colorado corporation with its principal place of business in Boulder, Colorado. Several examples follow that establish that an industry related to PopSockets products exists in the United States.

a. Significant Investment in Facilities, Plant, and Equipment: PopSockets has made significant investments in its facilities, plant, and equipment in the United States related to its domestic industry products. *See* Exhibit 30 (Barnett Decl.). PopSockets maintains a facility in Boulder, Colorado that houses approximately 70 employees. All of PopSockets' design and development activities take place in the United States. Details concerning PopSockets' U.S. investments in facilities are set forth in Confidential Exhibit 30. The technologies claimed in the '031 Patent were invented and developed in the United States. *Id.*

b. Significant Employment of Labor or Capital: PopSockets has made significant investments in the employment of labor and capital in the United States related to its PopSockets products. PopSockets employees located in the United States are involved in the engineering, research, development, operations, marketing, sales, service, and assembly of PopSockets products. *See* Exhibit 30 (Barnett Decl.). Confidential Exhibit 30 contains further details of PopSockets employees' U.S. activities relating to the PopSockets products.

c. Substantial Investment in the Exploitation of the Subject Patent:
PopSockets has made substantial investments in its exploitation of the '031 Patent in the United States, for example, through engineering, research, development, operations, and

assembly of the domestic industry PopSockets products in the United States. From the birth and patenting of the PopSockets product, and the personnel used in the engineering, marketing, business, to the distribution departments employed by PopSockets to research and develop, produce, sell, and design the PopSockets products—all of these activities are conducted at PopSockets' headquarters in Boulder, Colorado. For example, this is shown and supported by Complainant's website (popsockets.com), which Complainant develops and maintains, and that allows consumers to customize, design and purchase PopSockets products directly from PopSockets. *See* Exhibit 5. Confidential Exhibit 30 (Barnett Decl.) contains further details of PopSockets' domestic engineering and research and development expenditures.

X. RELATED LITIGATION

55. Upon information and belief, there is no related litigation at this time.

XI. REQUEST FOR GENERAL EXCLUSION ORDER

56. PopSockets seeks a general exclusion order as part of its relief.

57. A general exclusion order is warranted when such exclusion is necessary to prevent circumvention of an exclusion order limited to products and named persons or where there is a pattern of violation of Section 337 and it is difficult to identify the source of the infringing products. A general exclusion order is warranted here to prevent circumvention of any exclusion order limited to products of named entities, and because there is a pattern of violation of Section 337 and it is difficult to identify the source(s) of infringing products.

58. As set forth above and in the Declaration of Mr. Timothy J. Weber (Ex. 26), there are innumerable entities with thousands of infringing products entering the United States, under different brand names or private labels, and that, in many cases, list several different and confusing addresses for the same entity, and use various different marketing channels, such as

online websites that change and/or refer to different entities. Such activity makes it difficult, and in many instances impossible, to identify the source(s) of infringing products.

59. While PopSockets has identified herein multiple manufacturers and distributors of numerous infringing products, discovery will likely show additional and/or unrelated manufacturers and sellers that import infringing collapsible sockets for mobile electronic devices into the United States from China and other countries. Indeed, manufacturers and sellers of infringing collapsible sockets for mobile electronic devices appear to employ complex business arrangements, do business under more than one name, ship from multiple addresses, and/or form intricate arrays of confusingly similar affiliates, which will make it difficult, if not impossible, for Customs to determine the source of the infringing products. *See, e.g.*, Ex. 26 (Weber Decl.) at ¶¶ 11-11 and 19-36.

60. For example, Complainant has attempted to identify dozens of entities—in addition those already named as Respondents in this Complaint—that illegally import infringing collapsible sockets for mobile electronic devices into the United States by purchasing the infringing products. While Complainant has, in many instances, successfully purchased and received infringing products identifiable as illegal imports, e.g., by Chinese shipping labels, etc., so many of the received packages have intentionally or unintentionally illegible, confusing, contradictory, and often incomplete return addresses and, in some instances, no return addresses at all, making identification of the specific infringer a mystery. The below image is a true and accurate reproduction of various packages containing accused collapsible sockets for mobile electronic devices with addresses detailing the various confusing, and often unintelligible, addresses associated with importing foreign entities:



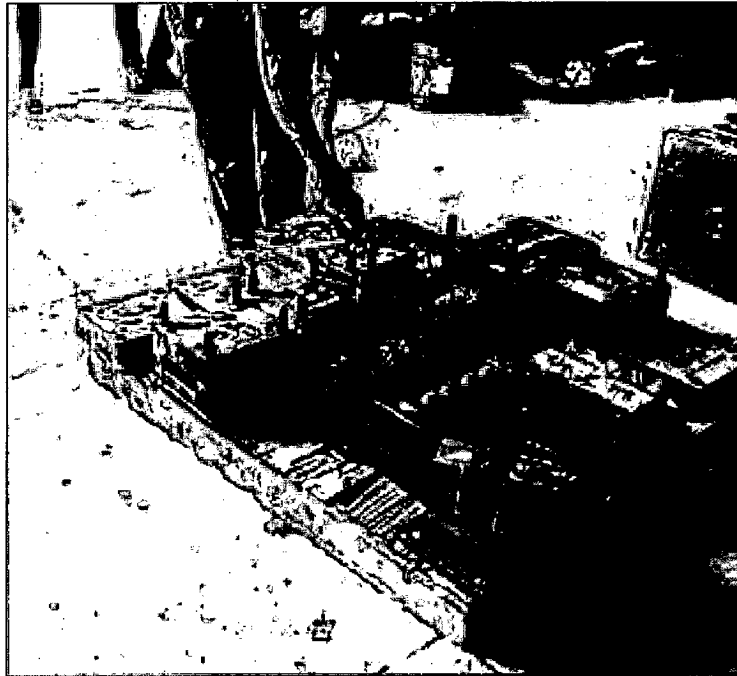
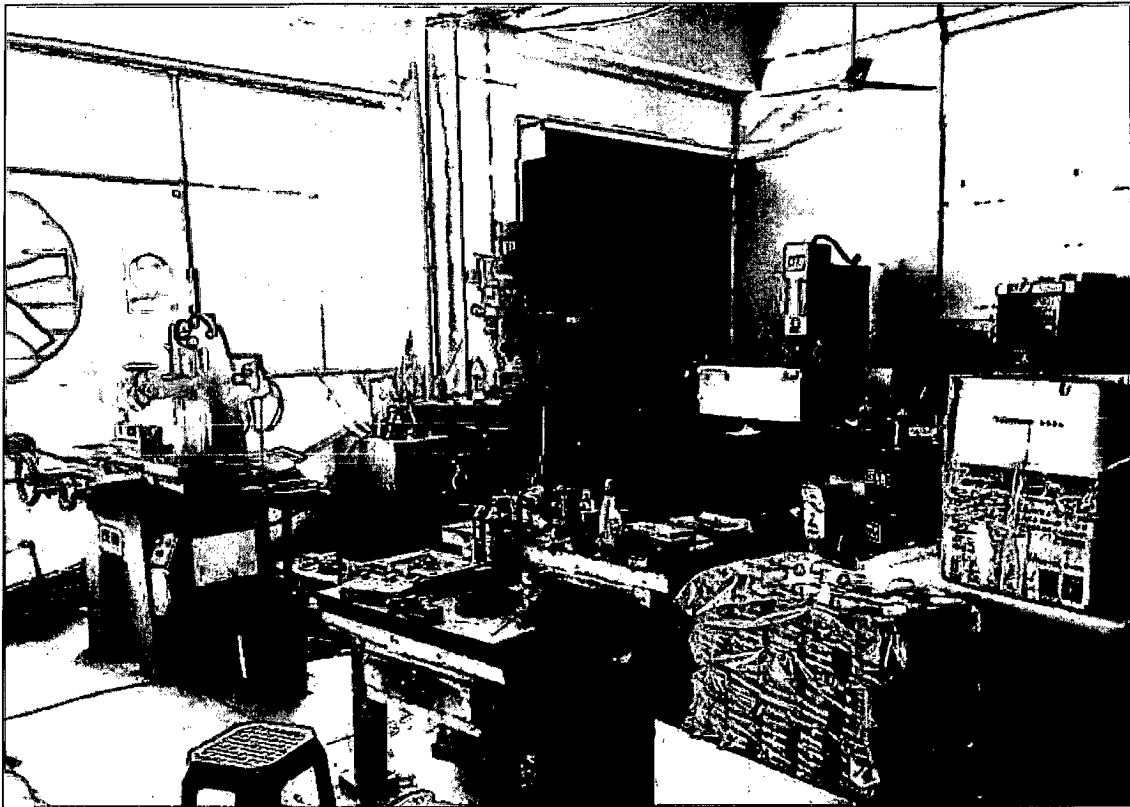
61. In addition, Complainant has determined that manufacturers and sellers promote hundreds of new infringing product online listings per day, where the products, upon information and belief, are listed for sale for importation into the United States or for sale in the United States after importation. For example, during the week of March 6, 2017 to March 16, 2017, Complainant identified more than 6,000 new listings of infringing collapsible sockets for mobile electronic devices, which is approximately 550 new listings per day.

62. For example, the below chart represents the here-today-gone-tomorrow, revolving door of infringing product listings, with various new listings posted by manufacturers and/or sellers of infringing collapsible sockets for mobile electronic devices on the Amazon website from a sample period from March 13 to March 20, 2017. The below chart specifically relates to a targeted search for “popsocket blue nebula,” which represents a PopSockets’ product with the Blue Nebula decorative design. The below chart exemplifies various infringing manufacturers

and/or sellers who posted new listings of infringing collapsible sockets for mobile electronic devices that copy the Blue Nebula design, where a “✓” indicates that the infringing product was available for purchase on the indicated date in 2017.

SAMPLE OF NEW INFRINGING SELLER LISTINGS (MARCH 13 – 20, 2017)						
Infringing Seller	March 13	March 14	March 15	March 17	March 20	Ships From Address
BLVD AP	✓	✓				Netherlands
Lidice Woods	✓	✓				Korea
Mnzein Priops	✓					Japan
Natalia STORE		✓				Canada
Rengen		✓				Angola
Greenwood Darnell		✓				Canada
Del				✓		New Zealand
Yrf5ara HaSAm				✓		Japan
Tgwulie Whasit					✓	Tunisia
caroline lee					✓	Hong Kong
Ujnaott Mikaaa					✓	Malaysia

63. Moreover, as depicted below, the Accused Products are small items of manufacture that can be easily replicated on portable machines that fit in a single room, using molds that can be inexpensively made, carried by hand, and therefore easily setup, packed up, relocated, and re-established, making a change in manufacturing location simple and fast. *See* Ex. 30 (Barnett Decl.).



64. This portability makes circumvention of specific types of enforcement, such as a limited exclusion order, easy, and inexpensive. *See* Ex. 30 (Barnett Decl.).

65. Given the difficulty in identifying the source of the infringing products, complexities and subversion in the trade channels, the ease of distribution of infringing collapsible sockets for mobile electronic devices, and the related manufacturing capacities, such distributors may easily evade an exclusion order limited to the named Respondents. Accordingly, given the innumerable international sources of infringing collapsible sockets for mobile electronic devices and components thereof, a general exclusion order is necessary to protect PopSockets and its substantial domestic industry.

XII. RELIEF REQUESTED

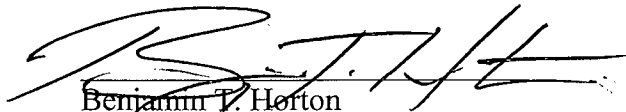
66. Respondents have infringed and will continue to infringe the '031 Patent unless the Commission prohibits the importation into and sale within the United States of the Accused Products.

67. PopSockets 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 the violations by the Respondents of Section 337 arising from the sale for importation into the United States, importation, and/or sale within the United States after importation of the Respondents' collapsible sockets for mobile electronic devices and components thereof, including, without limitation, the Accused Products;
- b) schedule and conduct a hearing, pursuant to Section 337(c), for purposes of receiving evidence and hearing argument concerning whether there has been a violation of Section 337 and, following the hearing, determine that there has been a violation of Section 337;

- c) issue a general exclusion barring from entry into the United States any and all collapsible sockets for mobile electronic devices and components thereof that infringe one or more claims of the '031 Patent;
- d) issue a limited exclusion order if a general exclusion order is not granted, excluding from entry into the United States any and all of the Respondents' Accused Products which infringe one or more claims of the '031 Patent, including, without limitation, the Accused Products sold within the United States as enumerated herein;
- e) issue cease-and-desist orders, pursuant to Section 337(f), directing the Respondents to cease and desist from importing, selling, selling for importation, offering for sale, using, demonstrating, promoting, marketing, and/or advertising in the United States and all of the Respondents' Accused Products which infringe, and any other of Respondents' products that are found to infringe, one or more claims of the '031 Patent, including, without limitation, the Accused Products sold within the United States; and
- f) grant all such other and further relief as it deems appropriate under applicable law, based upon the facts complained of herein as determined by the investigation.

Dated: April 7, 2017


Benjamin T. Horton
Ryan N. Phelan
MARSHALL, GERSTEIN & BORUN LLP
233 South Wacker Drive
6300 Willis Tower
Chicago, IL 60606-6357
Phone: (312) 474-6300

*Counsel for Complainant,
PopSockets LLC*