

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

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Shenzhen Mahihaoduo Trading Co. Ltd.,	)	
Plaintiff,	)	Case No. 1:25-cv-04242
	)	
v.	)	Dist. Judge Sunil R. Harjani
	)	
John Doe,	)	Mag. Judge Maria Valdez
Defendants	)	

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**Second Amended Complaint**

**NOW COMES** Shenzhen Mahihaoduo Trading Co. Ltd. (“Plaintiff”), by and through its undersigned counsel and hereby brings its case against John Doe (“Defendant”), and alleges as follows:

**Introduction**

1. This action has been filed by Plaintiff to combat online trademark infringers who trade upon Plaintiff’s commercial reputation and goodwill by offering for sale and/or selling unauthorized and unlicensed hair and nail care products.
2. Defendant has traded and continues to trade upon Plaintiff’s commercial reputation and goodwill by offering for sale and/or selling unlicensed products under Plaintiff’s registered trademark (“Infringing Products”) to consumers within the United States, including the State of Illinois and this Judicial District.
3. Defendant creates fully interactive, commercial Internet stores operating under at least the online marketplace account identified in **Schedule A**, attached hereto (the “Defendant Online Store”) and were intentionally designed to appear to be selling genuine products sourced from Plaintiff, while actually selling the Infringing Products to unknowing consumers.
4. Defendant attempts to avoid liability by going to lengths to conceal both its identity and the full scope and interworking of its infringing operation. Plaintiff is forced to file this action to

combat Defendant's unauthorized use of Plaintiff's registered trademark (the "Plaintiff Mark"), as well as to protect unknowing consumers from purchasing unauthorized products over the Internet. True and correct copies of the U.S. registrations for the Plaintiff Mark and notice of recordation of assignments of the U.S. registrations for the Plaintiff Mark to Plaintiff is attached hereto as [Dkt. 2-1].

5. Plaintiff has been and continues to be irreparably damaged through consumer confusion and the infringement of the Plaintiff Mark as a result of Defendant's actions and accordingly seeks injunctive and monetary relief.

### **Jurisdiction and Venue**

6. This Court has original subject matter jurisdiction over the claims in this action pursuant to 15 U.S.C. § 1051, *et seq.*, and 28 U.S.C. §§ 1331, 1338(a)-(b).
7. Venue is proper in this Court pursuant to 28 U.S.C. § 1391, and this Court may properly exercise personal jurisdiction over Defendant because Defendant directly targets its business activities toward consumers in the United States, including Illinois and this Judicial District. Defendant reaches out to do business with residents of Illinois and this Judicial District by operating one or more commercial, fully-interactive Defendant Online Store through which residents of Illinois and this Judicial District can purchase and/or do purchased products being offered and sold under the Plaintiff Mark. Defendant targeted sales from residents of Illinois and this Judicial District by operating a Defendant Online store that accepts payment in U.S. dollars, offered shipping to addresses within Illinois and this Judicial District for products offered using spurious versions of the Plaintiff Mark, and has shipped or offered and was prepared to ship products into this Judicial District. Defendant has committed and is committing tortious acts in Illinois and this Judicial District, is engaging in interstate commerce, and has wrongfully caused Plaintiff substantial injury in the State of Illinois.

### **Parties**

8. Plaintiff is a Chinese private company that specializes in the creation, manufacture, marketing, and sale of consumer housewares and other products through Plaintiff's business.
9. Plaintiff has invested substantial resources, time, money, and commercial efforts in order to establish the goodwill of Plaintiff's products and the Plaintiff Mark. The success of Plaintiff's business enterprise is dependent and a result of its effort to marketing, promoting, and advertising online via e-commerce.
10. Plaintiff's federal registrations for the Plaintiff Mark are valid, subsisting, and in full force and effect.
11. The Plaintiff Mark continuously was used in connection with the sale, distribution, promotion, and advertising of genuine Plaintiff products, and consumers associate the Plaintiff Mark with Plaintiff and its authorized products.
12. Genuine Plaintiff products have become very popular, driven by Plaintiff's elevated quality standards and innovative designs.
13. Genuine Plaintiff products have been distributed, promoted and sold through distributors throughout the world, including the United States and on AliBaba.com. Plaintiff's sales of authorized Plaintiff products have been substantial.
14. As a result of Plaintiff's long-standing use of the Plaintiff Mark in association with Plaintiff's high-quality products, extensive sales, and significant marketing activities, the Plaintiff Mark has achieved widespread acceptance and recognition among the consuming public and throughout U.S. interstate commerce.
15. Plaintiff has invested significant resources, time, money, and commercial efforts in order to establish the goodwill of the Plaintiff products. The success of Plaintiff's business enterprise is dependent and a result of its effort to marketing and advertising online via e-commerce.

16. The success of Plaintiff's products additionally stems from sales to consumers and interest that its consumers have generated.
17. As a result of the efforts of Plaintiff, the quality of Plaintiff's products, the promotional efforts for its products and designs, the members of the public have become familiar with Plaintiff's products and the Plaintiff Mark, and associate them exclusively with Plaintiff.
18. Plaintiff has made efforts to protect its interests in and to the Plaintiff Mark. On information and belief, Plaintiff has not licensed or authorized Defendants to exploit the Plaintiff Mark in any way.
19. Defendant is an individual or business entity who, upon information and belief, resides in the People's Republic of China or other foreign jurisdiction. Defendant conducts business throughout the United States, including within the State of Illinois and this Judicial District, through the operation of the fully interactive Defendant Online Store which operates on commercial online marketplaces. Defendant targets the United States, including Illinois and this Judicial District, and has offered to sell and, on information and belief, has sold and continues to sell Infringing Products to consumers within the United States, including the State of Illinois and this Judicial District.
20. On information and belief, Defendant knowingly and willfully imports, distributes, offers for sale, and sells products using unauthorized versions of the Plaintiff Mark. Tactics used by Defendant to conceal its identity and the full scope of its infringing operation make it virtually impossible for Plaintiff to learn Defendant's true identity and the exact interworking of its infringing network. In the event that Defendant or third-parties provides additional credible information regarding its identity, Plaintiff will take appropriate steps to amend this Complaint.

#### **Defendant's Unlawful Conduct**

21. Marketplaces like Walmart, among others, allow merchants to quickly “set up shop” and flood the market with unauthorized goods which displace actual sales manufacturers would otherwise enjoy.
22. It has been estimated that e-commerce intellectual property infringement costs merchants in the U.S. alone nearly \$41 billion<sup>1</sup> with Department of Homeland Security seizures of infringing goods increasing more than 10-fold between 2000 and 2018<sup>2</sup> and a street value of seized goods increasing 246% from 2017 to 2022.<sup>3</sup>
23. U.S. Customs and Border Protection (“CBP”) reported that for Fiscal Year 2023, it seized nearly 23 million counterfeit goods with a collective manufacturer’s suggested retail price of over \$2.7 billion (USD), with 46% of those seizures and 84% of the value coming from China and Hong Kong<sup>4</sup>
24. CBP reported that for Fiscal Year 2019, 90% of all CBP intellectual property seizures were smaller international mail and express shipments (as opposed to large cargo containers) and 85% of CBP seizures originated from mainland China, Singapore, and Hong Kong.<sup>5</sup>

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<sup>1</sup> The National Bureau of Asian Research, The Report of the Commission on the Theft of American Intellectual Property, at 9, Pub. The Commission on the Theft of American Intellectual Property 2017, available at [http://www.ipcommission.org/report/IP\\_Commission\\_Report\\_Update\\_2017.pdf](http://www.ipcommission.org/report/IP_Commission_Report_Update_2017.pdf).

<sup>2</sup> U.S. Department of Homeland Security, *Combating Trafficking in Counterfeit and Pirated Goods Report to the President of the United States*, January 24, 2020.

<sup>3</sup> U.S. Customs and Border Protection Office of Trade, FY 2022 Fact Sheet Intellectual Property Rights, available at <https://www.cbp.gov/sites/default/files/assets/documents/2023-Mar/IPR%20Fact%20Sheet%20FY2022%20Final%20Draft%20%28508%29%20%28004%29%20%282%29.pdf>

<sup>4</sup> U.S. Customs and Border Protection FY 2023 FACT SHEET Intellectual Property rights, available at [https://www.cbp.gov/sites/default/files/2024-05/IPR%20FACT%20SHEET%20FISCAL%20YEAR%202023%20PBRB%20APPROVED%20%28508%29\\_5.29.pdf](https://www.cbp.gov/sites/default/files/2024-05/IPR%20FACT%20SHEET%20FISCAL%20YEAR%202023%20PBRB%20APPROVED%20%28508%29_5.29.pdf)

<sup>5</sup> U.S. Customs and Border Protection Office of Trade, Intellectual Property Rights Fiscal Year 2019 Seizure Statistics, available at, <https://www.cbp.gov/sites/default/files/assets/documents/2020-Sep/FY%202019%20IPR%20Statistics%20Book%20%28Final%29.pdf>.

25. Legislation was recently introduced in the U.S. Senate that would allow CBP to seize articles that infringe design patents, thus closing a loophole currently exploited by infringers.<sup>6</sup>
26. Infringing and pirated products account for billions in economic losses, resulting in tens of thousands of lost jobs for legitimate businesses and broader economic losses, including lost tax revenue.
27. Third party service providers like those used by Defendant do not robustly subject new sellers to verification and confirmation of its identity, allowing infringers to “routinely use false or inaccurate names and addresses when registering with these e-commerce platforms.”<sup>7</sup>
28. DHS has observed that “at least some e-commerce platforms, little identifying information is necessary for [an infringer] to begin selling” and recommending that “[s]ignificantly enhanced vetting of third-party sellers” is necessary. Infringers hedge against the risk of being caught and having their websites taken down from an e-commerce platform by preemptively establishing multiple virtual storefronts.<sup>8</sup>
29. Since platforms generally do not require a seller on a third-party marketplace to identify the underlying business entity, infringers can have many different profiles that can appear unrelated even though they are commonly owned and operated.<sup>9</sup>
30. Further, “E-commerce platforms create bureaucratic or technical hurdles in helping brand owners to locate or identify sources of [infringement].”<sup>10</sup>

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<sup>6</sup> Press Release, U.S. Senator Thom Tillis, Tillis, Coons, Cassidy & Hirono Introduce Bipartisan Legislation to Seize Counterfeit Products and Protect American Consumers and Businesses (Dec. 5, 2019).

<sup>7</sup> Daniel C.K. Chow, *Alibaba, Amazon, and Counterfeiting in the Age of the Internet*, 40 NW. J. INT’L L. & BUS. 157, 186 (2020).

<sup>8</sup> *Combating Trafficking in Counterfeit and Pirated Goods Report to the President of the United States*, at p. 22.

<sup>9</sup> *Id.*, at p. 39.

<sup>10</sup> *Alibaba, Amazon, and Counterfeiting in the Age of the Internet*, 40 NW. J. INT’L L. & BUS. at 186-187.

31. The success of Plaintiff's sales of the Plaintiff Product has resulted in substantial infringing activity and other attempts to misappropriate Plaintiff's proprietary rights. Plaintiff has policed the use of its Plaintiff Mark and has identified certain online product listings on marketplaces such as Walmart, offering for sale and, on information and belief, selling products to consumers under unauthorized versions of the Plaintiff Mark throughout the United States including this Judicial District.
32. Defendant enables and facilitates sales of its infringing products with unauthorized versions of the Plaintiff Mark by presenting the Defendant Online Store as a legitimate reseller using standardized product listing layouts and terminology. On information and belief, Plaintiff has not licensed or authorized Defendant to use its Plaintiff Mark in any way, and Defendant is not an authorized retailer of genuine Plaintiff Products.
33. Defendant uses the same method to deceive unknowing consumers, namely, by including the Plaintiff Mark prominently above the product listing title, if not always the first word.
34. Defendant takes pains to conceal its identity from the public, almost invariably using meaningless store names and addresses which do not identify Defendant. Defendant may operate several stores simultaneously, using fictitious identities such as the one listed in **Schedule A**, as well as other fictitious names and addresses. Moreover, infringers like Defendant will often register new store accounts under new fictitious names when they receive notice that one or more stores have been the subject of a lawsuit. The use of these store registration schemes is one of several ways in which Defendant, to avoid being shut down, conceals its true identity and the inner workings of its infringement operation.
35. Infringers like Defendant will typically ship infringing products in small quantities via international mail to mitigate detection by U.S. Customs and Border Protection. Further, they will typically operate multiple credit card merchant accounts or use layers of payment gateways

to forestall its cashflow being interrupted due to trademark enforcement efforts. On information and belief, Defendant utilizes offshore bank accounts and routinely move funds from U.S.-based merchant accounts (*e.g.*, within China) outside the jurisdiction of this Court.

36. Defendant, without any authorization or license from Plaintiff, has knowingly and willfully used the Plaintiff Mark in connection with the advertisement, distribution, offering for sale, and sale of Infringing Products into the United States and into Illinois over the Internet.
37. Defendant offers shipping to the United States, including, specifically Illinois. On information and belief, Defendant has offered to sell or sold Infringing Products into the United States and the state of Illinois.
38. Defendant's unauthorized use of the Plaintiff Mark in connection with the advertising, distribution, offering for sale, and sale of Infringing Products, including with respect to the sale of such products into the United States, including specifically Illinois, is likely to cause and has caused confusion, mistake, and deception by and among consumers.

**Count I - Trademark Infringement (15 U.S.C. § 1114)**

39. Plaintiff repeats, re-alleges, and incorporates by reference the allegations set forth in Paragraphs 1 through 38.
40. Plaintiff's trademark infringement claims against Defendant are based on its unauthorized use in commerce of imitations of the federally-registered Plaintiff Mark in connection with the advertising, distribution, offering for sale, and sale of infringing goods.
41. The Plaintiff Mark is a distinctive mark, and consumers have come to expect superior quality from products advertised, distributed, offered, or sold under the Plaintiff Mark.
42. Defendant has advertised, distributed, offered to sell, sold, and are still advertising, distributing, offering to sell, and selling products using infringing reproductions of the Plaintiff Mark without Plaintiff's permission.

43. Plaintiff is the exclusive owner of the Plaintiff Mark. Plaintiff's registrations for the Plaintiff Mark are in full force and effect.
44. Upon information and belief, Defendant is aware and has knowledge of Plaintiff's rights in the Plaintiff Mark and is willfully infringing it and intentionally using infringing reproductions thereof.
45. Defendant's willful, intentional, and unauthorized use of the Plaintiff Mark is likely to cause and is causing confusion, mistake, and deception as to the origin and quality of the Infringing Products among the general public.
46. Defendant's activities constitute willful trademark infringement under 15 U.S.C. § 1114.
47. Plaintiff has no adequate remedy at all and will suffer irreparable harm to its reputation and goodwill of its well-known Plaintiff Mark if Defendant's actions are not enjoined.
48. Defendant's wrongful advertisement, offering to sell, and sale of Infringing Products have directly and proximately caused injuries and damage to Plaintiff.

**Count II - False Designation of Origin (15 U.S.C. § 1125(a))**

49. Plaintiff repeats, re-alleges, and incorporates by reference the allegations set forth in Paragraphs 1 through 48.
50. Defendant's advertising, distribution, offering for sale, and sale of Infringing Products has created and is creating a likelihood of confusion, mistake, and deception among the general public as to the affiliation, connection or association with Plaintiff or the origin, sponsorship, or approval of Defendant's Infringing Products by Plaintiff.
51. By using the Plaintiff Mark in association with the advertising, distribution, offering for sale, and sale of the Infringing Products, Defendant creates a false designation of origin and a misleading representation of fact as to the true origin and sponsorship of the Infringing Products.

52. Defendant's false designation of origin and misrepresentation of fact as to the origin and/or sponsorship of the Infringing Products to the general public involves the willful use of misleading marks and is a willful violation of 15 U.S.C. § 1125.

53. Plaintiff has no adequate remedy at all and will suffer irreparable harm to its reputation and goodwill of its well-known Plaintiff Mark if Defendant's actions are not enjoined.

**Count III - Violation of the Uniform Deceptive Trade Practices Act (815 ILCS § 510, et seq.)**

54. Plaintiff repeats, re-alleges, and incorporates by reference the allegations set forth in Paragraphs 1 through 53.

55. Defendant has engaged in acts which violate Illinois law including, without limitation: passing off its Infringing Products as those of Plaintiff; cause a likelihood of confusion and/or misunderstanding as to the source of its goods; causing a likelihood of confusion and/or misunderstanding as to the affiliation, connection, or association with genuine Plaintiff Products; representing that its products have Plaintiff's approval when they do not; and engaging in other conduct as described herein which creates a likelihood of confusion or misunderstanding among the public.

56. Defendant's foregoing acts constitute willful violations of the Illinois Uniform Deceptive Trademark Practices Act, 815 ILCS § 510, *et seq.*

57. Plaintiff has no adequate remedy at all and will suffer irreparable harm to its reputation and goodwill of its well-known Plaintiff Mark if Defendant's actions are not enjoined.

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff prays for judgment against Defendant as follows:

- 1) That Defendant, its affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under, or in concert with them be temporarily, preliminarily, and permanently enjoined and restrained from:

- a. Using the Plaintiff Mark or any reproductions, counterfeit copies, or colorable imitations thereof in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine Plaintiff Product or is not authorized by Plaintiff to be sold in connection with the Plaintiff Mark;
  - b. passing off, inducing, or enabling others to sell or pass off any product as a genuine Plaintiff Product or any other product produced by Plaintiff that is not Plaintiff's or is not produced under the authorization, control, or supervision of Plaintiff and approved by Plaintiff for sale using the Plaintiff Mark;
  - c. committing any acts calculated to cause consumers to believe that Defendant's Infringing Products are those sold under the authorization, control, or supervision of Plaintiff, or are sponsored by, approved by, or otherwise connected with Plaintiff;
  - d. further infringing the Plaintiff Mark and damaging Plaintiff's goodwill; and
  - e. manufacturing, shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for Plaintiff, nor authorized by Plaintiff to be sold or offered for sale, and which bear any of Plaintiff's trademarks, including the Plaintiff Mark, or any reproductions, counterfeit copies, or colorable imitations thereof;
- 2) Entry of an Order that, upon Plaintiff's request, those in privity with Defendant and those with notice of the injunction, including, without limitation, any online marketplace platforms such as Walmart, sponsored search engine or ad-word providers, credit cards, banks, merchant account providers, third party processors and other payment processing service providers, and Internet search engines such as Google, Bing and Yahoo (collectively, the "Third Party Providers") shall:
  - a. disable and cease providing services being used by Defendant, currently or in the future, to engage in the sale of goods using the Plaintiff Mark;



United States of America  
United States Patent and Trademark Office

**PIXNOR**

**Reg. No. 4,477,782**

**Registered Feb. 4, 2014**

**Int. Cl.: 14**

SHENZHEN SHIDAI ZHONGCHUANG INVESTMENT CO., LTD. (CHINA LIMITED COMPANY (LTD.))  
21G, HONGFUGE, CAIFU BUILDING,  
CAITIAN ROAD, FUTIAN DISTRICT,  
SHENZHEN CITY, CHINA

**TRADEMARK**

**PRINCIPAL REGISTER**

FOR: ALLOYS OF PRECIOUS METAL; BRACELETS; CASES FOR WATCHES AND CLOCKS; CLOCK CASES; CLOCKS; CLOISONNE PINS; EARRINGS; JADE; JEWELLERY; JEWELLERY CASES; JEWELLERY CASES OF PRECIOUS METAL; NECKLACES; PEARLS; PRECIOUS STONES; RINGS; SEMI-PRECIOUS STONES; SMALL JEWELLERY BOXES OF PRECIOUS METALS; THREADS OF PRECIOUS METAL; UNWROUGHT AND SEMI-WROUGHT PRECIOUS STONES AND THEIR IMITATIONS; WATCHES; WEDDING RINGS; WRIST-WATCHES, IN CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).

FIRST USE 9-1-2011; IN COMMERCE 7-5-2012.

THE MARK CONSISTS OF THE STYLIZED WORDING "PIXNOR".

THE WORDING "PIXNOR" HAS NO MEANING IN A FOREIGN LANGUAGE.

SER. NO. 85-966,054, FILED 6-21-2013.

ROSELLE HERRERA, EXAMINING ATTORNEY



*Michelle K. Lee*

Deputy Director of the United States  
Patent and Trademark Office



## UNITED STATES PATENT AND TRADEMARK OFFICE

UNDER SECRETARY OF COMMERCE FOR INTELLECTUAL PROPERTY AND  
DIRECTOR OF THE UNITED STATES PATENT AND TRADEMARK OFFICE

AUGUST 11, 2021

PTAS

TONY HOM  
64 BANK ST.  
ABINGTON, MA 02351

**900634257**

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RECORDATION DATE: 08/04/2021

REEL/FRAME: 7378/0802  
NUMBER OF PAGES: 2

BRIEF: ASSIGNS THE ENTIRE INTEREST

ASSIGNOR:

SHENZHEN SHIDAI ZHONGCHUANG  
INVESTMENT CO., LTD.

DOC DATE: 07/19/2021  
CITIZENSHIP: CHINA  
ENTITY: LIMITED COMPANY (LTD.)

ASSIGNEE:

SHENZHEN MAIHAODUO TRADING CO., LTD.

21F, MINGSHUIXUAN, JINRI JIAYUAN,  
NO.78, DONGCHANG ROAD, DONGXIAO  
STREET,  
LUOHU DIST, SHENZHEN,, CHINA

CITIZENSHIP: CHINA  
ENTITY: LIMITED COMPANY (LTD.)

SERIAL NUMBER: 85966054

FILING DATE: 06/21/2013

REGISTRATION NUMBER: 4477782

REGISTRATION DATE: 02/04/2014

MARK: PIXNOR

DRAWING TYPE: AN ILLUSTRATION DRAWING WITH WORD(S) /LETTER(S)/ NUMBER(S) IN  
STYLIZED FORM

ASSIGNMENT RECORDATION BRANCH  
PUBLIC RECORDS DIVISION

## TRADEMARK ASSIGNMENT COVER SHEET

Electronic Version v1.1  
Stylesheet Version v1.2

ETAS ID: TM664964

<b>SUBMISSION TYPE:</b>	NEW ASSIGNMENT		
<b>NATURE OF CONVEYANCE:</b>	ASSIGNMENT OF THE ENTIRE INTEREST AND THE GOODWILL		
<b>CONVEYING PARTY DATA</b>			
<b>Name</b>	<b>Formerly</b>	<b>Execution Date</b>	<b>Entity Type</b>
Shenzhen Shidai Zhongchuang Investment Co., Ltd.		07/19/2021	limited company (Ltd.): CHINA
<b>RECEIVING PARTY DATA</b>			
<b>Name:</b>	Shenzhen Maihaoduo Trading Co., Ltd.		
<b>Street Address:</b>	21F, Mingshuixuan, Jinri Jiayuan, No.78, Dongchang Road, Dongxiao Street,		
<b>City:</b>	Luohu Dist, Shenzhen,		
<b>State/Country:</b>	CHINA		
<b>Entity Type:</b>	limited company (Ltd.): CHINA		
<b>PROPERTY NUMBERS Total: 1</b>			
<b>Property Type</b>	<b>Number</b>	<b>Word Mark</b>	
<b>Registration Number:</b>	4477782	PIXNOR	
<b>CORRESPONDENCE DATA</b>			
<b>Fax Number:</b>			
<i>Correspondence will be sent to the e-mail address first; if that is unsuccessful, it will be sent using a fax number, if provided; if that is unsuccessful, it will be sent via US Mail.</i>			
<b>Phone:</b>	917-588-0481		
<b>Email:</b>	tonyhom1@outlook.com		
<b>Correspondent Name:</b>	Tony Hom		
<b>Address Line 1:</b>	64 Bank St.		
<b>Address Line 4:</b>	Abington, MASSACHUSETTS 02351		
<b>NAME OF SUBMITTER:</b>	Tony Hom		
<b>SIGNATURE:</b>	/h/		
<b>DATE SIGNED:</b>	08/04/2021		
<b>Total Attachments: 1</b>			
source=##32654;##22269;PIXNOR 4477782#page1.tif			

OP \$40.00 4477782

## Trademark assignment

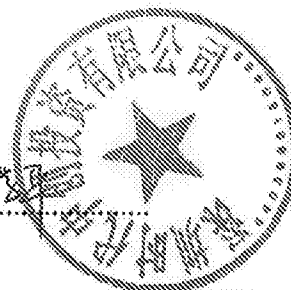
The undersigned, **Shenzhen Shidai Zhongchuang Investment Co., Ltd.**, residing at **21G, Hongfuge, Caifu Building, Caitian Road, Futian District, Shenzhen City CHINA 518000**, the owner of the trademark **PIXNOR, Registration No. 4477782** do hereby assign, sell and transfer all rights, titles and interests in and to the trademark and the registration, together with the goodwill of the business symbolized by the trademark and the registration, and with the right to recover and have damages and profits for past infringement, if any, to **Shenzhen Maihaoduo Trading Co., Ltd.**, residing at **21F, Mingshuixuan, Jinri Jiayuan, No.78, Dongchang Road, Dongxiao Street, Luohu Dist, Shenzhen, China**, the assignee henceforth having the right to consider himself as the sole owner of same and to use or dispose of same as he/they shall deem fit, without any further claim on the part of the assignor/s for any concept whatever.

Assignor authorizes **USPTO** to record the transfer of the registration set above to Assignee of Assignor's entire right, title and interest therein. Assignor agrees to further execute any documents reasonably necessary to effect this assignment or to confirm Assignee's ownership of the Trademark.

Given and signed at Shenzhen, China on this 19 day of July the year 2021.

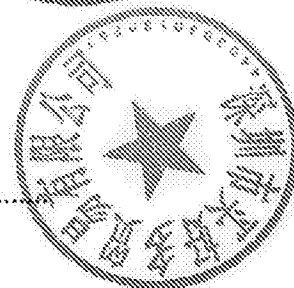
Signature of the assignor (Liu Xueping, President).....

刘雪平



Signature of the assignee (Zheng Bangyao, President).....

郑邦尧



# United States of America

United States Patent and Trademark Office

# PIXNOR

**Reg. No. 6,208,866**

**Registered Dec. 01, 2020**

**Int. Cl.: 21**

**Trademark**

**Principal Register**

Shenzhen Zhihuichuangxiang Technology Co., Ltd. (CHINA limited company (Ltd.))

6f, Internet E Era, Zhongxing Road East,  
Ma 'an Tang Bantian Street, Longgang  
District, Shenzhen, CHINA 518129

CLASS 21: Abrasive sponges for scrubbing the skin; Bird baths being bowls for birds to bathe in; Bowls; Boxes for dispensing paper towels for household use; Brushes for footwear; Cages for household pets; Cake molds; Cleaning brushes for household use; Cleaning rags; Cleaning sponges; Clothes-pins; Clothes racks, for drying; Clothing stretchers; Combs; Combs for animals; Cookery molds; Crockery, namely, pots, dishes, drinking cups and saucers, bowls, serving bowls and trays; Cups; Dishes; Drying racks for washing; Dust bins; Electric combs; Electric face cleansing brushes; Epergnes; Eyebrow brushes; Feeding troughs; Fitted vanity cases; Flower pots; Gardening gloves; Garlic presses; Horse brushes; Household utensils, namely, kitchen tongs; Large-toothed combs for the hair; Litter boxes for pets; Make-up removing appliances; Manual toothbrushes; Nail brushes; Place mats, not of paper or textile; Powder compacts sold empty; Powder puffs; Rails and rings for towels; Shaving brush stands; Shaving brushes; Sponges for household purposes; Toilet brush and toilet brush holder sets; Toilet brushes; Toilet sponges; Toothbrushes, electric

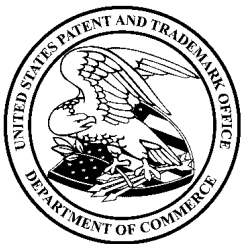
FIRST USE 9-15-2016; IN COMMERCE 11-15-2016

The mark consists of the stylized wording "PIXNOR".

OWNER OF U.S. REG. NO. 4951036

The wording "PIXNOR" has no meaning in a foreign language.

SER. NO. 88-668,185, FILED 10-24-2019



*Andrei Iancu*

Director of the United States  
Patent and Trademark Office





## UNITED STATES PATENT AND TRADEMARK OFFICE

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AUGUST 11, 2021

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PLEASE REVIEW ALL INFORMATION CONTAINED ON THIS NOTICE. THE INFORMATION CONTAINED ON THIS RECORDATION NOTICE REFLECTS THE DATA PRESENT IN THE PATENT AND TRADEMARK ASSIGNMENT SYSTEM. IF YOU SHOULD FIND ANY ERRORS OR HAVE QUESTIONS CONCERNING THIS NOTICE, YOU MAY CONTACT THE ASSIGNMENT RECORDATION BRANCH AT 571-272-3350. PLEASE SEND REQUEST FOR CORRECTION TO: U.S. PATENT AND TRADEMARK OFFICE, MAIL STOP: ASSIGNMENT RECORDATION BRANCH, P.O. BOX 1450, ALEXANDRIA, VA 22313.

RECORDATION DATE: 08/04/2021

REEL/FRAME: 7378/0792  
NUMBER OF PAGES: 2

BRIEF: ASSIGNS THE ENTIRE INTEREST

ASSIGNOR:

SHENZHEN ZHIHUICHUANGXIANG  
TECHNOLOGY CO., LTD.

DOC DATE: 07/19/2021  
CITIZENSHIP: CHINA  
ENTITY: LIMITED COMPANY (LTD.)

ASSIGNEE:

SHENZHEN MAIHAODUO TRADING CO., LTD.

21F, MINGSHUIXUAN, JINRI JIAYUAN,  
NO.78, DONGCHANG ROAD, DONGXIAO  
STREET,  
LUOHU DIST, SHENZHEN,, CHINA

CITIZENSHIP: CHINA  
ENTITY: LIMITED COMPANY (LTD.)

SERIAL NUMBER: 86762361

FILING DATE: 09/21/2015

REGISTRATION NUMBER: 4951036

REGISTRATION DATE: 05/03/2016

MARK: PIXNOR

DRAWING TYPE: AN ILLUSTRATION DRAWING WITH WORD(S) /LETTER(S)/ NUMBER(S) IN  
STYLIZED FORM

SERIAL NUMBER: 88668185

FILING DATE: 10/24/2019

REGISTRATION NUMBER: 6208866

REGISTRATION DATE: 12/01/2020

MARK: PIXNOR

DRAWING TYPE: AN ILLUSTRATION DRAWING WITH WORD(S) /LETTER(S)/ NUMBER(S) IN  
STYLIZED FORM

ASSIGNMENT RECORDATION BRANCH  
PUBLIC RECORDS DIVISION

## TRADEMARK ASSIGNMENT COVER SHEET

Electronic Version v1.1  
Stylesheet Version v1.2

ETAS ID: TM664962

<b>SUBMISSION TYPE:</b>	NEW ASSIGNMENT		
<b>NATURE OF CONVEYANCE:</b>	ASSIGNMENT OF THE ENTIRE INTEREST AND THE GOODWILL		
<b>CONVEYING PARTY DATA</b>			
<b>Name</b>	<b>Formerly</b>	<b>Execution Date</b>	<b>Entity Type</b>
SHENZHEN ZHIHUICHUANGXIANG TECHNOLOGY CO., LTD.		07/19/2021	limited company (Ltd.): CHINA
<b>RECEIVING PARTY DATA</b>			
<b>Name:</b>	Shenzhen Maihaoduo Trading Co., Ltd.		
<b>Street Address:</b>	21F, Mingshuixuan, Jinri Jiayuan, No.78, Dongchang Road, Dongxiao Street,		
<b>City:</b>	Luohu Dist, Shenzhen,		
<b>State/Country:</b>	CHINA		
<b>Entity Type:</b>	limited company (Ltd.): CHINA		
<b>PROPERTY NUMBERS Total: 2</b>			
<b>Property Type</b>	<b>Number</b>	<b>Word Mark</b>	
<b>Registration Number:</b>	4951036	PIXNOR	
<b>Registration Number:</b>	6208866	PIXNOR	
<b>CORRESPONDENCE DATA</b>			
<b>Fax Number:</b>			
<i>Correspondence will be sent to the e-mail address first; if that is unsuccessful, it will be sent using a fax number, if provided; if that is unsuccessful, it will be sent via US Mail.</i>			
<b>Phone:</b>	917-588-0481		
<b>Email:</b>	tonyhom1@outlook.com		
<b>Correspondent Name:</b>	Tony Hom		
<b>Address Line 1:</b>	64 Bank St.		
<b>Address Line 4:</b>	Abington, MASSACHUSETTS 02351		
<b>NAME OF SUBMITTER:</b>	Tony Hom		
<b>SIGNATURE:</b>	/h/		
<b>DATE SIGNED:</b>	08/04/2021		
<b>Total Attachments: 1</b>			
source=&#32654;&#22269;PIXNOR 4951036 & 6208866#page1.tif			

OP \$65.00 4951036

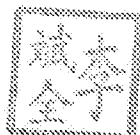
## Trademark assignment

The undersigned, **SHENZHEN ZHIHUICHUANGXIANG TECHNOLOGY CO., LTD.**, residing at **6F, INTERNET E ERA, ZHONGXING ROAD EAST, MA 'AN TANG BANTIAN STREET, LONGGANG DISTRICT, SHENZHEN, CHINA**, the owner of the trademark **PIXNOR, Registration No. 4951036** and trademark **PIXNOR, Registration No. 6208866** do hereby assign, sell and transfer all rights, titles and interests in and to the trademark and the registration, together with the goodwill of the business symbolized by the trademark and the registration, and with the right to recover and have damages and profits for past infringement, if any, to **Shenzhen Maihaoduo Trading Co., Ltd.**, residing at **21F, Mingshuixuan, Jinri Jiayuan, No.78, Dongchang Road, Dongxiao Street, Luohu Dist, Shenzhen, China**, the assignee henceforth having the right to consider himself as the sole owner of same and to use or dispose of same as he/they shall deem fit, without any further claim on the part of the assignor/s for any concept whatever.

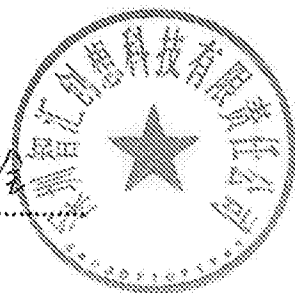
Assignor authorizes **USPTO** to record the transfer of the registration set above to Assignee of Assignor's entire right, title and interest therein. Assignor agrees to further execute any documents reasonably necessary to effect this assignment or to confirm Assignee's ownership of the Trademark.

Given and signed at Shenzhen, China on this 19 day of July the year 2021.

Signature of the assignor (Li Binqun, President).....

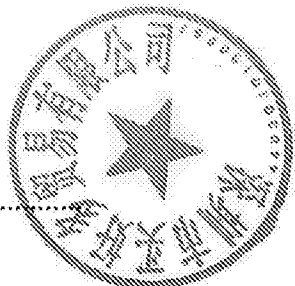


李斌群



Signature of the assignee (Zheng Bangyao, President).....

郑邦耀



# United States of America

United States Patent and Trademark Office

# PIXNOR

**Reg. No. 4,951,036**

**Registered May 3, 2016**

**Int. Cl.: 3**

**TRADEMARK**

**PRINCIPAL REGISTER**

SHENZHEN JIANDAN NETWORK TECHNOLOGY CO., LIMITED (CHINA LIMITED COMPANY (LTD.))

NO. L, FLOOR 21, BLOCK A, HONGFU PAVILION  
CAIFU BLDG, CAITIAN RD, FUTIAN DISTRICT  
SHENZHEN CITY, CHINA

FOR: ABRASIVE CLOTH AND PAPER; ADHESIVES FOR AFFIXING FALSE EYELASHES; AIR FRAGRANCING PREPARATIONS; ALL-PURPOSE CLEANERS; AROMATIC PILLOWS COMPRISING POTPOURRI IN FABRIC CONTAINERS; BEAUTY MASKS; BODY AND BEAUTY CARE COSMETICS; BODY EMULSIONS; CAKES OF TOILET SOAP; CHEEK COLORS; CLEANING AND POLISHING PREPARATIONS; CLEANING PREPARATIONS; CLEANING, SCOURING AND POLISHING PREPARATIONS AND SUBSTANCES; CLEANSING AND POLISHING PREPARATIONS; CLOTHS IMPREGNATED WITH A DETERGENT FOR CLEANING; COSMETIC PENCILS; COSMETIC PREPARATIONS FOR BATH AND SHOWER; COSMETIC PREPARATIONS FOR EYELASHES; COSMETIC PREPARATIONS FOR SLIMMING PURPOSES; COSMETICS FOR ANIMALS; COSMETICS IN THE FORM OF MILKS, LOTIONS AND EMULSIONS; COTTON STICKS FOR COSMETIC PURPOSES; CREAMS FOR LEATHER; DENTAL BLEACHING GELS; DENTIFRICES; DENTURE POLISHES; DEODORANTS FOR HUMAN BEINGS; DEODORANTS FOR PETS; DEPILATORIES; EMERY BOARDS; EXFOLIATING PAD CONTAINING A GLYCOLIC INGREDIENT NOT FOR MEDICAL PURPOSES; EYEBROW COSMETICS; EYEBROW PENCILS; FACE AND BODY LOTIONS; FACIAL CLEANSERS; FACIAL EMULSIONS; FALSE EYELASHES; FALSE NAILS; FLOOR WAX; FOAM CLEANSERS FOR PERSONAL USE; FRAGRANCED FACE CARE PREPARATIONS, NAMELY, FACIAL CLEANSERS, FACIAL MOISTURIZERS; FUMIGATING INCENSES (KUNKO); GENERAL PURPOSE CLEANING, POLISHING, AND ABRASIVE LIQUIDS AND POWDERS; INCENSE; LIP GLOSS; LIPSTICK; MAKE-UP; MAKE-UP KITS COMPRISED OF LIPSTICK, LIP GLOSS; MAKE-UP POWDER; MAKE-UP REMOVING LOTIONS; MASCARA; MEDICATED SOAP; MUSTACHE WAX; NAIL ART STICKERS; NAIL CARE PREPARATIONS; NAIL POLISH; NON-MEDICATED MOUTH WASHES; OILS FOR CLEANING PURPOSES; PAINT STRIPPING PREPARATIONS; PERFUME OILS; PERFUMES; POLISH FOR FURNITURE AND FLOORING; POLISHING PREPARATIONS; POLISHING STONES; POLISHING, SCOURING AND ABRASIVE PREPARATIONS; PUMICE STONES FOR PERSONAL USE; ROOM FRAGRANCE REFILLS FOR NON-ELECTRIC ROOM FRAGRANCE DISPENSERS; SCENTED WOOD; SHAVING STONES; SHOWER AND BATH FOAM; SKIN LOTION; UPHOLSTERY CLEANERS, IN CLASS 3 (U.S. CLS. 1, 4, 6, 50, 51 AND 52).



*Michelle K. Lee*

Director of the United States  
Patent and Trademark Office

**Reg. No. 4,951,036** FIRST USE 6-1-2013; IN COMMERCE 8-5-2013.

THE WORDING "PIXNOR" HAS NO MEANING IN A FOREIGN LANGUAGE.

SER. NO. 86-762,361, FILED 9-21-2015.

HOWARD SMIGA, EXAMINING ATTORNEY



## UNITED STATES PATENT AND TRADEMARK OFFICE

UNDER SECRETARY OF COMMERCE FOR INTELLECTUAL PROPERTY AND  
DIRECTOR OF THE UNITED STATES PATENT AND TRADEMARK OFFICE

MARCH 6, 2019

PTAS

LI BINQUAN  
NO.9, HANGDA ROAD, XIHU DISTRICT,  
5F, WEST JULONG BUILDING,  
HANGZHOU,, 310007 CHINA

**900488077**

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RECORDATION DATE: 03/05/2019

REEL/FRAME: 6580/0714  
NUMBER OF PAGES: 2

BRIEF: ASSIGNS THE ENTIRE INTEREST

ASSIGNOR:

SHENZHEN JIANDAN NETWORK TECHNOLOGY  
CO., LIMITED

DOC DATE: 01/04/2019  
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ENTITY: LIMITED COMPANY (LTD.)

ASSIGNEE:

SHENZHEN ZHIHUICHUANGXIANG  
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6F, INTERNET E ERA, ZHONGXING ROAD  
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STYLIZED FORM

ASSIGNMENT RECORDATION BRANCH  
PUBLIC RECORDS DIVISION

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

Shenzhen Mahihaoduo Trading Co. Ltd.,	)	
Plaintiff,	)	Case No. 1:25-cv-04242
	)	
v.	)	Dist. Judge Sunil R. Harjani
	)	
John Doe,	)	Mag. Judge Maria Valdez
Defendants	)	

**Sealed**

**Schedule A to the Second Amended Complaint**

N o.	Store Name	Store URL	Listing URL
1	BLARKRUS- LI	<a href="https://www.walmart.com/global/seller/101664778/cp/shopall">https://www.walmart.com/global/seller/101664778/cp/shopall</a>	<a href="https://www.walmart.com/ip/Eyebrow-Scissors-Professional-Cuticle-Scissors-Stainless-Steel-Curved-Blade-Manicure-Pedicure-Beauty-Grooming-for-Nail-Eyelash-Dry-Skin/358465423">https://www.walmart.com/ip/Eyebrow-Scissors-Professional-Cuticle-Scissors-Stainless-Steel-Curved-Blade-Manicure-Pedicure-Beauty-Grooming-for-Nail-Eyelash-Dry-Skin/358465423</a>