

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

AQUAPAW BRANDS LLC,
Plaintiff,

v.

FLO PET, ATEVEN, BIANWOSHOP,
BLUESKY CONCEPTS,
CHANGYUANSHIDIWENSHANGMAO
YOUXIANGONGSI,
CHENZHIFA1247, CLASSIER,
EGO OFFICIAL STORE,
EXCELLENTUS, FEIXUEER,
FENGRUI LTD, FEUTAV, LUNATREE,
MEIZHIXING, OCATHNON USA,
SIKSIN, SMILEY CHOICE,
TAIYUANSXIXIAODIANQULIDUBING
UAN, TENTER, THEAMOR, WINGA,
WUNA, YEARNCNLL, ZUOLONG,
1K9BULLDOGS, 2019DAJIDALI,
BEAUTY_NOW, BUYITNPW,
COMPUWIZ2008, CRAFTMEGAZONE,
DAILYSELECT, DIDOG-PET,
DOGSUPPLIER5, GTLIFESTYLE,
IDEAL_PARADIS2008, JENUX.W,
LINF20082011, LIORASULIN_STORE,
LIVE_MORE_MART, NTXY34,
ONEPOUNDDEALS, ONOPOLY,
PEIRISEMARKET.001,
PETPILLER_ONLINE_STORE,
SAIRON2016, SAIRONG, SK789456123,
TECHACCESSORIESOUTLET,
YANZEO, YWGREENTIME7,
ANGLE GAURA'S STORE,
AYX PETS PRODUCTS STORE,
BRILLIANT GAURA'S STORE,
CDDM STORE, DAIDAIDOG STORE,
DOGS&CATS SUPPLIES FACTORY
STORE, FANTALIFE STORE,
GOOD PETS PRODUCTS STORE,
GOODLIFE HOUSE HOLDAILY
STORE, HOMEDECOR-PET STORE,
I HOUSE STORE,

Civil Action No.

FILED UNDER SEAL

JOYYOURLIFE STORE,
KEVNICELY PET-LIFE STORE,
KISDE STORE,
KITCHENBAR SUPPLIES STORE,
KUSO STORE,
LECHONG WORLD STORE,
LT TOOLS STORE,
MANDAKINI PETS STORE,
NANCY WANG'S STORE,
PANAOPET STORE,
PAWSTRIP OFFICIAL STORE,
PETLY STORE,
PTHAFUN PETHAPPYFUN STORE,
SDX ONLINE STORE,
SHOP4643047 STORE,
SHOP5632046 STORE,
SHOP911067111 STORE,
SHOP911135035 STORE,
SHOP911609123 STORE,
SPRING HOMEWARE STORE,
VZZ OFFICIAL STORE,
WARM DEPARTMENT STORE STORE,
YI YE BAO FU STORE,
CHINESE STORE, CRN,
ECZER RODRIGUEZ, LINMEIXIU,
OSP, RICHFASH, SHUIQIXIA,
SMOOME INTERNATIONAL,
SONGJIULIN7419,
XMJ.JIUSHIWO, and
ZLNBOR-8,

Defendants.

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

AQUAPAW BRANDS LLC, a Delaware limited liability company (“Plaintiff”), hereby sues Defendants, the Individuals, Partnerships, and Unincorporated Associations identified in the Caption and which are set forth in **Schedule “A”** hereto (collectively “Defendants”). Defendants have willfully infringed one or more of the claims of U.S. Patent No. 10,531,728 (“Plaintiff’s

Patent” or “the Plaintiff’s Patent”) by offering for sale, selling, and distributing knock-off versions of Plaintiff’s Aquapaw® Pet Bathing Tool (“Infringing Products”). In support of their claims, Plaintiff allege as follows:

NATURE OF THE ACTION

1. Nate Jelovich is an executive of the Plaintiff company, AQUAPAW BRANDS LLC, the 100% owner of all the assets of AQUAPAW LLC, the original company that developed and marketed the product at issue in this case (i.e., the Aquapaw® Pet Bathing Tool). The inventor of the Plaintiff’s patented product solved the challenging problem of bathing a dog by examining the task from the dog’s perspective. By creating a sprayer/scrubber operable by one hand, the inventor was able to hold and comfort the dog with the free hand while cleaning the pet with the device. Today, the product is sold by Plaintiff under the brand name Aquapaw® Pet Bathing Tool (“Plaintiff’s Product”).

2. Defendants have offered for sale, sold, and distributed knock-off versions of the Plaintiff’s Product which infringe at least one claim of the Plaintiff’s Patent. Moreover, Defendants’ sale, distribution, and advertising of the Infringing Product are highly likely to cause consumers to believe that Defendants are offering a genuine version of Plaintiff’s Product when they are not.

3. Shown below are the example types of Infringing Product offered for sale by the Defendants:

TYPE 1 INFRINGING PRODUCT



TYPE 2 INFRINGING PRODUCT



4. As poorly designed and manufactured products, Defendants' Infringing Products may injure an unsuspecting pet that tries to ingest it; likewise, the flimsiness of the product may disappoint a customer who may give the product a bad review.

5. Defendants' Infringing Products are substantially inferior to the genuine product. With poorly designed and manufactured products, Defendants' Infringing Products create serious public safety risks and threaten to destroy the reputation of high quality that Plaintiff's Products have earned.

6. Plaintiff's Product is marketed and advertised extensively including on its website aquapaw.com and its storefront on Amazon.com. The unique features of Plaintiff's Product and the manner in which it is marketed and advertised, including, the distinct photographs, the design, the instructions, the packaging, and the unique presentation of the product, all comprise Plaintiff's valuable intellectual property ("IP") and all have become distinct in consumer's minds such that consumers associate all of this IP with Plaintiff's Product. Screenshots from Plaintiff's Website and Amazon Store are attached as Complaint Exhibit 1.

7. The innovative features of Plaintiff's Product are the subject of U. S. Patent No. 10,531,728 entitled "Hand Attachable Animal Washing Apparatus". A copy of the patent is attached as Complaint Exhibit 2. The Plaintiff's Product is marked in accordance with the Patent Act.

8. On information and belief, Defendants' sale of Infringing Products gives rise to a plausible expectation that discovery will reveal that Defendants' actions all arise from the same transaction, occurrence, or series of transactions. Specifically, on information and belief, Defendants are actively participating in a conspiracy to distribute and sell Infringing Products. For example, Defendants, on information and belief, are working together to manufacture, arrange the manufacture of and/or sell and otherwise distribute the Infringing Products. Moreover, the Infringing Products all infringe on at least one claim of the Plaintiff's Patent and the Infringing Products are the same or substantially similar products.

9. Plaintiff therefore bring this action for Patent Infringement under 35 U.S.C. § 271, and The All Writs Act, 28 U.S.C. § 1651(a).

JURISDICTION AND VENUE

10. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338.

11. This Court may exercise personal jurisdiction over a non-resident of the State in which the Court sits to the extent authorized by the state's laws. Fed. R. Civ. P. 4(e). Pennsylvania authorizes personal jurisdiction over each Defendant pursuant to 42 Pa. Cons. Stat. § 5322 (a) which provides in pertinent part: “A tribunal of this Commonwealth may exercise personal jurisdiction over a person ... as to a cause of action or other matter arising from such person: (1) Transacting any business in this Commonwealth. Without excluding other acts which may constitute transacting business for the purpose of this paragraph: (ii) The doing of a single act in this Commonwealth for the purpose of thereby realizing pecuniary benefit ... (3) Causing harm or tortious injury by an act or omission in this Commonwealth. (4) Causing harm or tortious injury by an act or omission outside this Commonwealth ... (10) Committing any violation within the jurisdiction of the Commonwealth of any statute, home rule charter, local ordinance or resolution, or rule or regulation promulgated thereunder by any government unit or of any order of court or other government unit.” In the alternative, Federal Rule of Civil Procedure 4(k) confers personal jurisdiction over the Defendants because, upon information and belief, Defendants regularly conduct, transact and/or solicit business in Pennsylvania and in this judicial district, and/or derive substantial revenue from their business transactions in Pennsylvania and in this judicial district and/or otherwise avail themselves of the privileges and protections of the laws of the Commonwealth of Pennsylvania such that this Court's assertion of jurisdiction over Defendants does not offend traditional notions of fair play and due process, and/or Defendants’ illegal counterfeiting and infringing actions caused injury to Plaintiff in

Pennsylvania and in this judicial district such that Defendants should reasonably expect such actions to have consequences in Pennsylvania and in this judicial district, for example:

a. Upon information and belief, at all times relevant hereto, Defendants were and/or are systematically directing and/or targeting their business activities at consumers in the United States, including Pennsylvania, through on-line platforms with Merchant Storefronts (as defined *infra*), via on-line marketplace websites, such as Amazon.com, under the Seller IDs, as well as any and all as yet undiscovered accounts with Merchant Storefronts held by or associated with Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them (“User Accounts”), through which consumers in the United States, including Pennsylvania, can view the one or more of Defendants’ Merchant Storefronts that each Defendant operates, uses to communicate with Defendants regarding their listings for Infringing Products and to place orders for, receive invoices for and purchase Infringing Products for delivery in the U.S., including Pennsylvania, as a means for establishing regular business with the U.S., including Pennsylvania.

b. Upon information and belief, certain Defendants are sophisticated sellers, each operating one or more commercial businesses using their respective User Accounts through which Defendants, their respective officers, employees, agents, servants and all persons in active concert of participation with any of them, operate storefronts to manufacture, import, export, advertise, market, promote, distribute, offer for sale and/or otherwise deal in products, including the Infringing Products, which are held by or associated with Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them (“Merchant Storefront(s)”) in

wholesale quantities at significantly below-market prices to consumers worldwide, including to those in the U.S., and specifically Pennsylvania.

c. Upon information and belief, Defendants' Merchant Storefronts reflect multiple sales to consumers all over the world, including repeat sales to consumers in the U.S. and into this judicial district.

d. Upon information and belief, all Defendants accept payment in U.S. Dollars and offer shipping to the U.S., including to Pennsylvania.

e. Upon information and belief, at all times relevant, Defendants have transacted business with consumers located in the U.S., including Pennsylvania, for the sale and shipment of Infringing Products.

f. Upon information and belief, some Defendants are employing and benefiting from substantially similar, paid advertising and marketing and advertising strategies in order to make their Merchant Storefronts selling illegal goods appear more relevant and attractive to search result software across an array of search words, including but not limited to "PET SPRAYER", "DOG SPRAYER", AND "PET BATHING TOOL". By their actions, Defendants are causing concurrent and indivisible harm to Plaintiff and the consuming public by (i) depriving Plaintiff of their right to fairly compete for space within the various on-line marketplace search results and reducing the visibility of the Plaintiff's Product on various on-line marketplaces and/or diluting and driving down the retail market price for the Plaintiff's Product (ii) causing an overall degradation of the value of the goodwill associated with Plaintiff's Product; and (iii) increasing Plaintiff's overall cost to market its goods and educate consumers about its brand and products.

g. Upon information and belief, Defendants have cooperated, communicated their plans with one another, shared information, purchased their infringing products from the same source, and coordinated their efforts, all in order to create an illegal marketplace operating in parallel to the legitimate marketplace of Plaintiff's and the legally authorized resellers of Plaintiff's genuine goods.

h. Upon information and belief, Defendants are concurrently targeting their infringing activities toward consumers and causing harm in Allegheny County, Pennsylvania.

i. Upon information and belief, Defendants likely reside and/or operate in foreign jurisdictions with lax trademark and patent enforcement systems and are cooperating by creating an illegal stream of infringing and counterfeit goods.

j. Upon information and belief, Defendants are aware of Plaintiff, its genuine Aquapaw[®] Pet Bathing Tool, and are aware that their illegal infringing actions alleged herein are likely to cause injury to Plaintiff in the United States, in Pennsylvania and in this judicial district specifically, as Plaintiff conducts substantial business in Pennsylvania.

k. Plaintiff is suffering irreparable and indivisible injury and suffered substantial damages as a result of Defendants' unauthorized and wrongful sale of infringing goods.

12. Venue is proper, *inter alia*, pursuant to 28 U.S.C. § 1391 because, for example:

a. Upon information and belief, Defendants conduct, transact, and/or solicit business in this judicial district.

b. Upon information and belief, Defendants or their agent(s) may be found in this district because personal jurisdiction is proper in this district.

c. Upon information and belief, this is a judicial district in which a substantial part of the events or omissions giving rise to the infringement claims occurred, or a substantial part of the property that is the subject of the action is situated.

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

THE PLAINTIFF

13. Plaintiff, AquaPaw Brands LLC, is a Delaware limited liability company and has its principal place of business at 113 Cherry Street, PMB 89249, Seattle, Washington 98104-2205 U.S.

14. Plaintiff is, in part, engaged in the business of manufacturing and distributing throughout the world, including within this district, the Aquapaw[®] Pet Bathing Tool, through its website, aquapaw.com, its authorized storefront on amazon.com, and various retail establishments. Defendants, through the sale and offer to sell Infringing Products are directly, and unfairly, competing with Plaintiff's economic interest in the Commonwealth of Pennsylvania and causing Plaintiff harm within this jurisdiction.

15. Like many other brand owners, Plaintiff suffer ongoing daily and sustained violations of their rights at the hands of infringers, such as Defendants herein, who wrongfully reproduce Plaintiff's Products for the twin purposes of (i) duping and confusing the consuming public and (ii) earning substantial profits from the sale of their Infringing Products. The natural and intended byproduct of Defendants' actions is the erosion and destruction of the goodwill

associated with Plaintiff's Products and the destruction of the legitimate market sector in which Plaintiff operate.

16. The recent explosion of counterfeiting and infringement over the Internet, including through online marketplace platforms, has created an environment that requires brand owners, such as Plaintiff, to expend significant time and money across a wide spectrum of efforts in order to protect both consumers and Plaintiff from the ill effects of confusion and the erosion of the goodwill associated with Plaintiff's brand and products.

THE DEFENDANTS

17. The Defendants are individuals and/or business entities of unknown makeup, each of whom, upon information and belief, either reside or operate in foreign jurisdictions, or (though not foreign) redistribute products from the same or similar sources in those foreign locations. Defendants have the capacity to be sued pursuant to Federal Rule of Civil Procedure 17(b). Defendants target their business activities toward consumers throughout the United States, including within this district, and conduct pervasive business through the operation of, at least, one fully interactive commercial Internet based e-commerce store via, at least one of the Internet based online marketplaces Amazon.com, ebay.com, aliexpress.com, and wish.com, all under the Seller IDs.

18. Upon information and belief, the Defendants use aliases in conjunction with the operation of their businesses as set forth in Schedule "A" hereto.

19. Defendants are the past and present controlling forces behind the sale of products infringing at least one claim of the Plaintiff's Patent described herein using at least the Seller IDs.

20. Upon information and belief, Defendants were willfully advertising, offering for sale and selling goods infringing upon at least one claim of the Plaintiff's Patent to consumers within the United States and this district through several fully interactive, commercial Internet websites and Internet based e-commerce stores operating under, at least, the storefronts, the Seller IDs, and any additional domain names, websites and corresponding website URLs or seller identifications and store URL aliases not yet known to Plaintiff. Defendants have purposefully directed some portion of their illegal activities towards consumers in the Commonwealth of Pennsylvania through the advertisement, offer to sell, sale, and/or shipment of Infringing Products into the Commonwealth.

21. Defendants have registered, established or purchased, and maintained the on-line marketplace website storefronts and Seller IDs. Upon information and belief, Defendants have engaged in fraudulent conduct with respect to the registration of the storefronts and Seller IDs by providing false and/or misleading information to the Internet based e-commerce platforms where they offer for sale and/or sell, during the registration or maintenance process related to their respective Seller ID. Upon information and belief, Defendants have anonymously registered and maintained some of the Seller IDs for the sole purpose of engaging in illegal infringing activities.

22. Upon information and belief, Defendants will continue to register or acquire new seller identification aliases for the purpose of selling and offering for sale goods infringing at least one claim of the Plaintiff's Patent unless preliminarily and permanently enjoined.

23. Defendants' Internet-based businesses amount to nothing more than illegal operations established and operated in order to infringe the intellectual property rights of Plaintiff.

24. Defendants' business names, i.e., the Seller IDs, associated payment accounts, and any other alias seller identification names used in connection with the sale of goods infringing on at least one claim of the Plaintiff's Patent are essential components of Defendants' online activities and are the means by which Defendants further their infringement scheme and cause harm to Plaintiff.

COMMON FACTUAL ALLEGATIONS

Plaintiff and Its Innovative Aquapaw® Pet Bathing Tool

25. The Plaintiff's Product is an innovative wearable sprayer-scrubber combination that easily connects to a garden hose or faucet and permits the owner to operate the device with one hand while they hold their pet firmly with the other hand. The Plaintiff's Product, pictured below, retails for \$24.95:



26. On January 14, 2020, the U.S. Patent and Trademark Office issued the '728 patent, the claims of which protect Plaintiff's Product. The Plaintiff's Patent has never been assigned or licensed to any of the Defendants in this matter. Plaintiff has provided constructive notice of the Plaintiff's Patent by placing the patent number of the patent on the packaging of Plaintiff's

Product. Plaintiff's patent marking is also accomplished on its web site at <https://www.aquapaw.com/pages/patents> (last visited July 15, 2021).

27. Plaintiff's Product has been featured in videos or articles by numerous media outlets, including: NBC's "The Today Show"; "Shark Tank", QVC, Business Insider, Ace Hardware Store, BuzzFeed, and Country Living. Plaintiff's Product has won numerous awards, including: Editor's Choice Awards *Pet Product News* 2017 Winner, *Pet Business* 2017 Industry Recognition Award Winner, and *Global Pet Expo*, Best in Show, Dog Company.

Defendants' Wrongful and Infringing Conduct

28. Upon information and belief, Defendants are, through at least the Internet based e-commerce stores operating under the Seller IDs, promoting, selling, offering for sale and distributing goods that willfully infringe at least one claim of the Plaintiff's Patent while marketing their knock-off products in a willful attempt to pass off their knock-off products as the genuine version of Plaintiff's Products.

29. Upon information and belief, Defendants' Infringing Products are of a quality substantially and materially different than that of Plaintiff's genuine goods. Defendants, upon information and belief, are actively using, promoting and otherwise advertising, distributing, selling, and/or offering for sale substantial quantities of their Infringing Products with the knowledge and intent that such goods will be mistaken for the genuine high quality goods offered for sale by Plaintiff despite Defendants' knowledge that they are without authority to use the subject matter of the Plaintiff's Patent.

30. Defendants advertise their Infringing Products for sale to the consuming public via Internet based e-commerce stores on, at least, one Internet marketplace using at least the Seller

IDs. In so advertising these goods, Defendants improperly and unlawfully infringe at least one claim of the Plaintiff's Patent without Plaintiff's permission.

31. As part of their overall infringement scheme, Defendants are, upon information and belief, concurrently employing and benefitting from substantially similar, advertising and marketing strategies based, in large measure, upon an illegal use of infringements of the Plaintiff's Patent in order to make their e-commerce stores selling illegal goods appear more relevant and attractive to consumers online. By their actions, Defendants are contributing to the creation and maintenance of an illegal marketplace operating in parallel to the legitimate marketplace for Plaintiff's genuine goods. Defendants are causing, individual, concurrent and indivisible harm to Plaintiff and the consuming public by (i) depriving Plaintiff and other third parties of their right to fairly compete for space within search engine results and reducing the visibility of Plaintiff's genuine goods on the World Wide Web, (ii) causing actual consumer confusion, (iii) harm to Plaintiff's reputations, including tarnishing their status as the innovator in this market, (iv) an overall degradation of the value of the goodwill associated with the Plaintiff's brand, and (v) increasing Plaintiff's overall cost to market its goods and educate consumers about its brand via the Internet.

32. Plaintiff confirmed that Defendants were and/or are still currently offering for sale and/or selling Infringing Products for sale to the consuming public via Internet based e-commerce stores on, at least, one Internet marketplace using at least the Seller IDs and that Defendants provide shipping and/or have actually shipped Infringing Products to customers located within this judicial district.

33. There is no question that the Infringing Product itself and the manner in which it is marketed is designed to confuse and mislead consumers into believing that they are purchasing

Plaintiff's Product or that the Infringing Product is otherwise approved by or sourced from Plaintiff, thereby trading on the goodwill and reputation of Plaintiff.

34. Upon information and belief, at all times relevant hereto, Defendants in this action had full knowledge of Plaintiff's ownership of the Plaintiff's Patent. Defendants' use of the patent is without Plaintiff's consent or authorization.

35. Defendants are engaging in the above-described illegal infringing activities knowingly and intentionally or with reckless disregard or willful blindness to Plaintiff's rights for the purpose of infringing the Plaintiff's Patent and trading on Plaintiff's goodwill and reputation. If Defendants' intentional infringing activities are not preliminarily and permanently enjoined by this Court, Plaintiff and the consuming public will continue to be harmed.

36. Defendants' above identified infringing activities are likely to cause confusion, deception, and mistake in the minds of consumers before, during, and after the time of purchase. Moreover, Defendants' wrongful conduct is likely to create a false impression and deceive customers, the public, and the trade into believing there is a connection or association between Plaintiff's Products and Defendants' Infringing Products, which there is not.

37. Upon information and belief, Defendants' payment and financial accounts are being used by Defendants to accept, receive, and deposit profits from Defendants' infringing activities connected to their Seller IDs and any other alias e-commerce stores, photo albums, seller identification names, domain names, or websites being used and/or controlled by them.

38. Further, upon information and belief, Defendants are likely to transfer or secret their assets to avoid payment of any monetary judgment awarded to Plaintiff.

39. Plaintiff has no adequate remedy at law.

40. Plaintiff is suffering irreparable injury and have suffered substantial damages as a result of Defendants' unauthorized and wrongful infringement of at least one claim of the Plaintiff's Patent. If Defendants' infringing activities are not preliminarily and permanently enjoined by this Court, Plaintiff and the consuming public will continue to be harmed.

41. The harm and damages sustained by Plaintiff has been directly and proximately caused by Defendants' wrongful reproduction, use, advertisement, promotion, offers to sell, and sale of their Infringing Products.

COUNT I – PATENT INFRINGEMENT (35 U.S.C. § 271 (a))

42. The allegations in the above paragraphs are hereby incorporated by reference.

43. Plaintiff owns U. S. Patent No. 10,531,728 entitled "Hand Attachable Animal Washing Apparatus". A copy of the patent is attached as Complaint **Exhibit 2**. The Plaintiff's Product is marked in accordance with the Patent Act.

44. The Accused Products Type 1 and 2 infringe at least Claim 1 of the Plaintiff's Product, as more fully detailed in **Exhibits 3 and 4**, respectively.

45. Defendants have infringed and continue to infringe the Plaintiff's Patent either directly or indirectly through acts of contributory infringement or inducement in violation of 35 U.S.C. § 271, by making, using, selling, importing and/or offering to sell Infringing Products, namely the knock-offs that infringe at least one claim of the Plaintiff's Patent.

46. Defendants' infringement, contributory infringement and/or inducement to infringe has injured Plaintiff and they, therefore, is entitled to recover damages adequate to compensate it for such infringement, but in no event less than a reasonable royalty.

47. Defendants' infringement, contributory infringement and/or inducement to infringe has been willful and deliberate because Defendants have notice of or knew of the Plaintiff's Patent and have nonetheless injured and will continue to injure Plaintiff, unless and until this Court enters an injunction, which prohibits further infringement and specifically enjoins further manufacture, use, sale, importation and/or offer for sale of products or services that come within the scope of the Plaintiff's Patent.

48. Based on Defendants' wrongful conduct, Plaintiff is entitled to injunctive relief as well as monetary damages and other remedies as provided by the Patent Act, including damages that Plaintiff has sustained and will sustain as a result of Defendants' illegal and infringing actions as alleged herein, enhanced discretionary damages and reasonable attorneys' fees and costs.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment on all Counts of this Complaint and an award of equitable relief and monetary relief against Defendants as follows:

a. Entry of temporary, preliminary and permanent injunctions pursuant to 35 U.S.C. § 283, and Federal Rule of Civil Procedure 65 enjoining Defendants, their agents, representatives, servants, employees, and all those acting in concert or participation therewith, from manufacturing or causing to be manufactured, importing, advertising or promoting, distributing, selling or offering to sell their Infringing Products;

c. Entry of an Order that, upon Plaintiff's request, any Internet marketplace website operators and/or administrators that are provided with notice of the injunction, including but not limited to the online marketplaces Amazon.com, ebay.com, aliexpress.com, and wish.com,

identify any e-mail address known to be associated with Defendants' respective Seller ID, and cease facilitating access to any or all e-commerce stores through which Defendants engage in the promotion, offering for sale, and/or sale of Infringing Products.

d. Entry of an Order that, upon Plaintiff's request, any Internet marketplace website operators and/or administrators who are provided with notice of the injunction, including but not limited to the online marketplaces Amazon.com, ebay.com, aliexpress.com, and wish.com, permanently remove any and all listings offering for sale Infringing Products via the e-commerce stores operating under the Seller IDs, including any and all listings linked to the same seller or linked to any other alias seller identification name being used and/or controlled by Defendants to promote, offer for sale and/or sell Infringing Products.

e. Entry of an Order that, upon Plaintiff's request, any Internet marketplace website operators and/or administrators who are provided with notice of the injunction, including but not limited to the online marketplaces Amazon.com, ebay.com, aliexpress.com, and wish.com, immediately cease fulfillment of and sequester all goods of each Defendant or other Seller under a Seller ID offering for sale the Infringing Product in its inventory, possession, custody, or control, and surrender those goods to Plaintiff.

f. Entry of an order awarding Plaintiff damages adequate to compensate for the infringement of its patent, but in no event less than a reasonable royalty for the use made of the invention by the Defendants, together with interest and costs as fixed by the Court pursuant to 35 U.S.C. § 284 and that the award be trebled as provided for under 35 U.S.C. §284.

g. Entry of an Order finding that this case is exceptional and an award to Plaintiff of its attorney fees and costs as provided by for under 35 U.S.C. § 285.

h. Entry of an Order that, upon Plaintiff's request, any financial institutions, payment processors, banks, escrow services, money transmitters, including, but not limited to, Zhejiang Ant Small and Micro Financial Services Group Co., Ltd. Alipay (China) Internet Technology Co. Ltd., and Alipay.com Co., Ltd. (collectively referred to as "Alipay")¹, Amazon Payments, Inc., PayPal, Inc. d/b/a paypal.com, and Context Logic, Inc. d/b/a wish.com, or marketplace platforms, including but not limited to, Amazon.com, ebay.com, aliexpress.com, and Context Logic, Inc d/b/a wish.com, and their related companies and affiliates, identify and restrain all funds, up to and including the total amount of judgment, in all financial accounts and/or sub-accounts used in connection with the Seller IDs or other domain names, alias seller identification names, or e-commerce store names or store URLs used by Defendants presently or in the future, as well as any other related accounts of the same customer(s) and any other accounts which transfer funds into the same financial institution account(s), to be surrendered to Plaintiff in partial satisfaction of the monetary judgment entered herein.

i. Entry of an award of pre- and post-judgment interest on the judgment amount.

j. Entry of an order for any further relief as the Court may deem just and proper.

¹ WorldPay US, Inc. ("WorldPay") processes transactions on behalf of Alibaba and Alipay, which may appear as "Aliexpress" on a cardholder's credit card statement.

DEMAND FOR JURY TRIAL

Plaintiff respectfully demand a trial by jury on all claims.

Respectfully submitted,

Dated: July 27, 2021

/s/ Stanley D. Ference III

Stanley D. Ference III

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Attorneys for Plaintiff

Schedule “A”

Defendants With Store Name and Seller ID

Defendant No.	Defendant/Store Name	Seller ID
1	FLO PET	A194IS3ICJQ9A8
2	ATEVEN	A194IS3ICJQ9A8
3	BIANWOSHOP	A1EQO44G3OGZYN
4	BlueSky Concepts	AUZSTHAUAWVHI
5	changyuanshidiwenshangmaoyouxiangongsi	A2636V446VDOQZ
6	chenzhifa1247	A3OWZDEBXSERBM
7	Classier	A22KWEH2NQ4J9U
8	EGO OFFICIAL STORE	A2E77WWUA18WUR
9	excellentUS	A3SSOY7INO37S1
10	feixueer	A1LQPL61AZAWBK
11	FengRui Ltd	A1CXOKK0NI3QHD
12	Feutav	A2LVTHZNLIGTPR
13	LunaTree	A2F1UT4DM9UHF5
14	meizhixing	A3N9NNJGL0WGNR
15	Ocathnon USA	ATFM4Q4YZIKS
16	Siksin	AY00LPZREP9MA
17	Smiley Choice	A534YEHTGZC4P
18	TaiYuanShiXiaoDianQuLiDuBinGuan	A1XA9DMTPIQ2XA
19	TEnter	A1ZNKN09QNKKV4
20	THEAMOR	AESDXIEX5W3QZ
21	winga	A5BY4YRHD8J3M

Defendant No.	Defendant/Store Name	Seller ID
22	WUNA	A177GNV088P62A
23	yearncnll	A2LVQ7C33YYH8A
24	zuolong	ASSW0R2ASLISD
25	1k9bulldogs	152942818474
26	2019dajidali	363419739156
27	beauty_now	203478507068
28	buyitnpw	133663229023
29	compuwiz2008	114633163034
30	craftmegazone	251846544876
31	dailyselect	313363509675
32	didog-pet	194062869513
33	dogsupplier5	265109109611
34	gtlifestyle	373431872742
35	ideal_paradis2008	363419740051
36	jenux.w	323138113562
37	linfs20082011	203260585240
38	liorasulin_store	393310393168
39	live_more_mart	363272852605
40	ntxy34	203106778095
41	onepounddeals	402890109011
42	onopoly	174640073228
43	peirisemarket.001	363383392460
44	petpillar_online_store	313523048016
45	sairon2016	164218092692

Defendant No.	Defendant/Store Name	Seller ID
46	sairong	184314676862
47	sk789456123	303902447207
48	techaccessoriesoutlet	192180508976
49	yanzeo	184541192745
50	ywgreentime7	154037471814
51	Angle Gaura's Store	5134032
52	AYX pets products Store	5115093
53	Brilliant Gaura's Store	5882024
54	CDDM Store	5045402
55	daidaidog Store	911068014
56	Dogs&Cats Supplies Factory Store	911788744
57	FANTALIFE Store	5008354
58	GOOD Pets Products Store	910939032
59	Goodlife house holdaily Store	5885363
60	HomeDecor-Pet Store	5002060
61	i House Store	5788344
62	JOYYOURLIFE Store	911115260
63	KEVNICELY Pet-Life Store	910554326
64	KISDE Store	900241098
65	Kitchenbar supplies Store	5729079
66	Kuso Store	5790179
67	LeChong World Store	900244038
68	LT Tools Store	5872377
69	Mandakini Pets Store	5880972

Defendant No.	Defendant/Store Name	Seller ID
70	Nancy Wang's store	800907
71	PanAo Pet Store	1242039
72	pawstrip Official Store	1316428
73	Petly Store	910330050
74	PTHAFUN PetHappyFun Store	911133231
75	SDX Online Store	605740
76	Shop4643047 Store	4643047
77	Shop5632046 Store	5632046
78	Shop911067111 Store	911067111
79	Shop911135035 Store	911135035
80	Shop911609123 Store	911609123
81	Spring Homeware Store	5067250
82	VZZ Official Store	5665015
83	Warm Department Store Store	911772689
84	Yi Ye Bao Fu Store	5788876
85	CHINESE STORE	566706e63a698c07b635d688
86	crn	5ec7e07718a38aed6c78c348
87	eczer rodriguez	5da7432944ba68078281d33a
88	linmeixiu	5e155d8dbbf4740022036b0b
89	OSP	595cfd28905fdb3dbc824c5a
90	Richfash	5ffd3ade462cdf04833b1b1e
91	SHUIQIXIA	5ab38bf167d25c516fc8a92c
92	Smooome International	5f0a87b2d5dea8d402f82f28
93	songjiulin7419	5fc49df442eefa12d868de80

Defendant No.	Defendant/Store Name	Seller ID
94	XMJ.JIUSHIWO	5db25ba77c0d0801c04ff456
95	Zlnbor-8	5dc927b74b0ae7758c00d88f

LISTING OF EXHIBITS

- Exhibit 1.....Screenshots from Plaintiff's Website and Amazon Store
- Exhibit 2.....U.S. Patent No. 10,531,728
- Exhibit 3.....Comparison of Type 1 Infringing Product to claim 1 of U.S. Patent
No. 10,531,728
- Exhibit 4.....Comparison of Type 2 Infringing Product to claim 1 of U.S. Patent
No. 10,531,728

Exhibit 1


<https://www.aquapaw.com/products/aquapaw-bathing-tool>

(Excerpts)

← → ↺ ↻ 🔍 🏠 📦 🌟 ⌚ 👤 ⋮

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- One size fits all design straps quickly and easily to either left or right hands.
- Includes adapters to connect to either your shower or garden hose.
- Comes with 6 (2 Sec) hose.

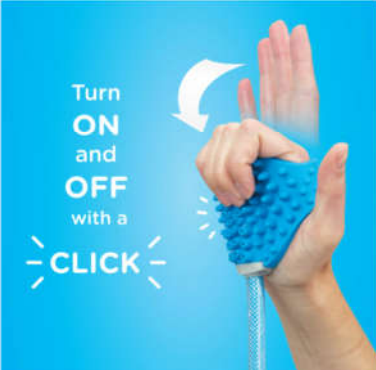
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- Eliminates mess and stress: This all-in-one tool lets you brush and rinse your pet simultaneously, for faster bathing with no need for bucket rinsing. The button mechanism lets you click easily from ON to OFF with one hand, leaving your other hand free to soothe your pet
- Indoor/outdoor use: Comes with adapters to fit shower spigot or garden hose, so you can easily create a small animal grooming station indoors in your tub or a large animal shower outside. Includes 8-foot hose
- Ergonomic design: With its one-size-fits-all design, Aquapaw straps securely to either hand. The ON/OFF button rests in your palm, for ease of operation. The strap adjusts easily to fit all hand sizes
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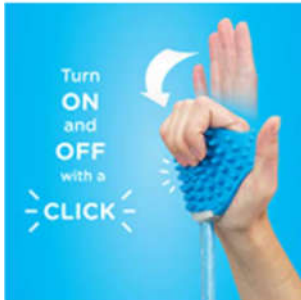




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Pet Bathing Tool

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Our innovative sprayer and scrubber in one can help you reduce the stress of bath time for both you and your pup.

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The innovative click on/click off design makes it easy to bathe your pet in the same way you would pet them with one hand, and always have the other hand to keep them under control.

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Water sprays from rubber scrubbers in your palm, allowing you to soak, scrub, and rinse your pet by injecting water deep into their fur.



Less Spraying Water for Less Mess

The Aquapaw bathing tool can be operated entirely with one hand. Use both hands to comfort your pet while bathe them like you're petting them.



One Size Fits All

The Aquapaw is slim, flexible, and doesn't impede your dexterity. Use the adjustable strap on the back to fit hands of all shapes and sizes.

Exhibit 2

(12) **United States Patent**
Lentz

(10) **Patent No.:** **US 10,531,728 B2**
(45) **Date of Patent:** **Jan. 14, 2020**

(54) **HAND ATTACHABLE ANIMAL WASHING APPARATUS**

A46B 1/00; A46B 5/029; A46B 5/04;
A46B 9/005; A46B 11/0072; A46B
2200/1093; A46B 5/0025; A46B 5/002;
A46B 5/0033; A46B 2200/10; A46B
2200/20; A01K 13/001

(71) Applicant: **Daniel Jacob Lentz**, Campbell, CA
(US)

See application file for complete search history.

(72) Inventor: **Daniel Jacob Lentz**, Campbell, CA
(US)

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(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 305 days.

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(21) Appl. No.: **15/641,018**

(22) Filed: **Jul. 3, 2017**

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(65) **Prior Publication Data**

US 2018/0078028 A1 Mar. 22, 2018

Related U.S. Application Data

Primary Examiner — David J Walczak

(60) Provisional application No. 62/396,123, filed on Sep. 17, 2016.

(74) *Attorney, Agent, or Firm* — Williams Intellectual Property; Benjamin F. Williams

(51) **Int. Cl.**

A46B 11/06 (2006.01)
A46B 1/00 (2006.01)
A46B 5/04 (2006.01)
A46B 9/00 (2006.01)
A46B 11/00 (2006.01)
A01K 13/00 (2006.01)
A46B 5/00 (2006.01)

(57)

ABSTRACT

(52) **U.S. Cl.**

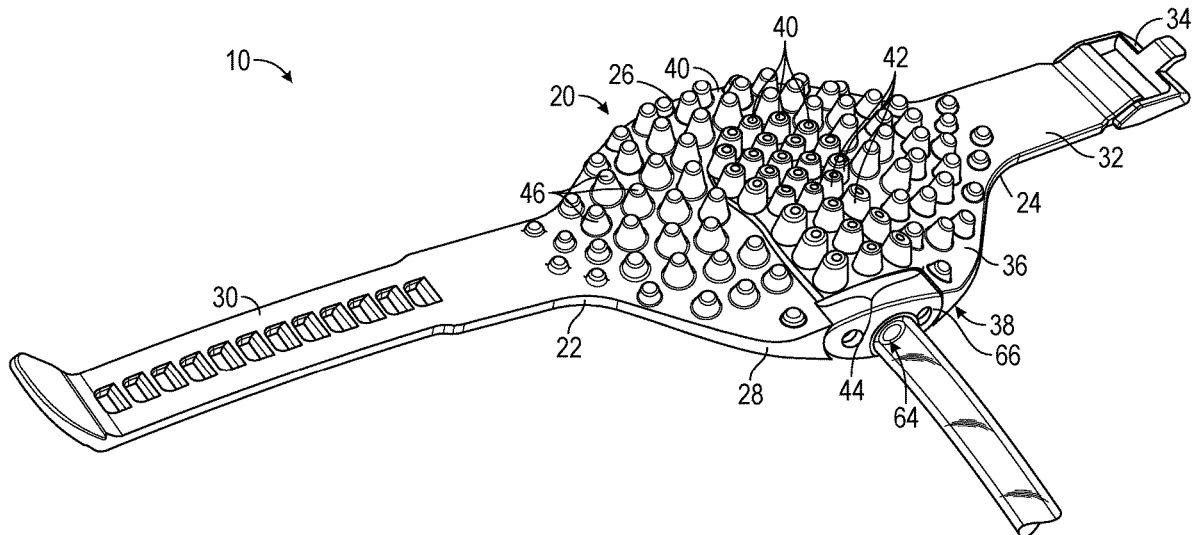
CPC *A46B 11/063* (2013.01); *A01K 13/001* (2013.01); *A46B 1/00* (2013.01); *A46B 5/0029* (2013.01); *A46B 5/04* (2013.01); *A46B 9/005* (2013.01); *A46B 11/0006* (2013.01); *A46B 11/0072* (2013.01); *A46B 2200/1093* (2013.01)

A hand attachable animal washing apparatus, attachable upon the hand of a user, enables singlehanded control of water flow and application of water into the coat of an animal. Control of water flow through a molded body portion is effective by singlehanded operation of a valve assembly disposed interiorly within the molded body portion. A user is enabled to open and close the valve assembly by compressing a compressible portion disposed proximally overlying the user's palm when wearing the apparatus upon one hand. A user may thereby control and apply water applied to an animal with one hand while securing and comforting the animal with the other hand.

(58) **Field of Classification Search**

CPC ... A46B 11/063; A46B 11/06; A46B 11/0006;

11 Claims, 5 Drawing Sheets



(56)

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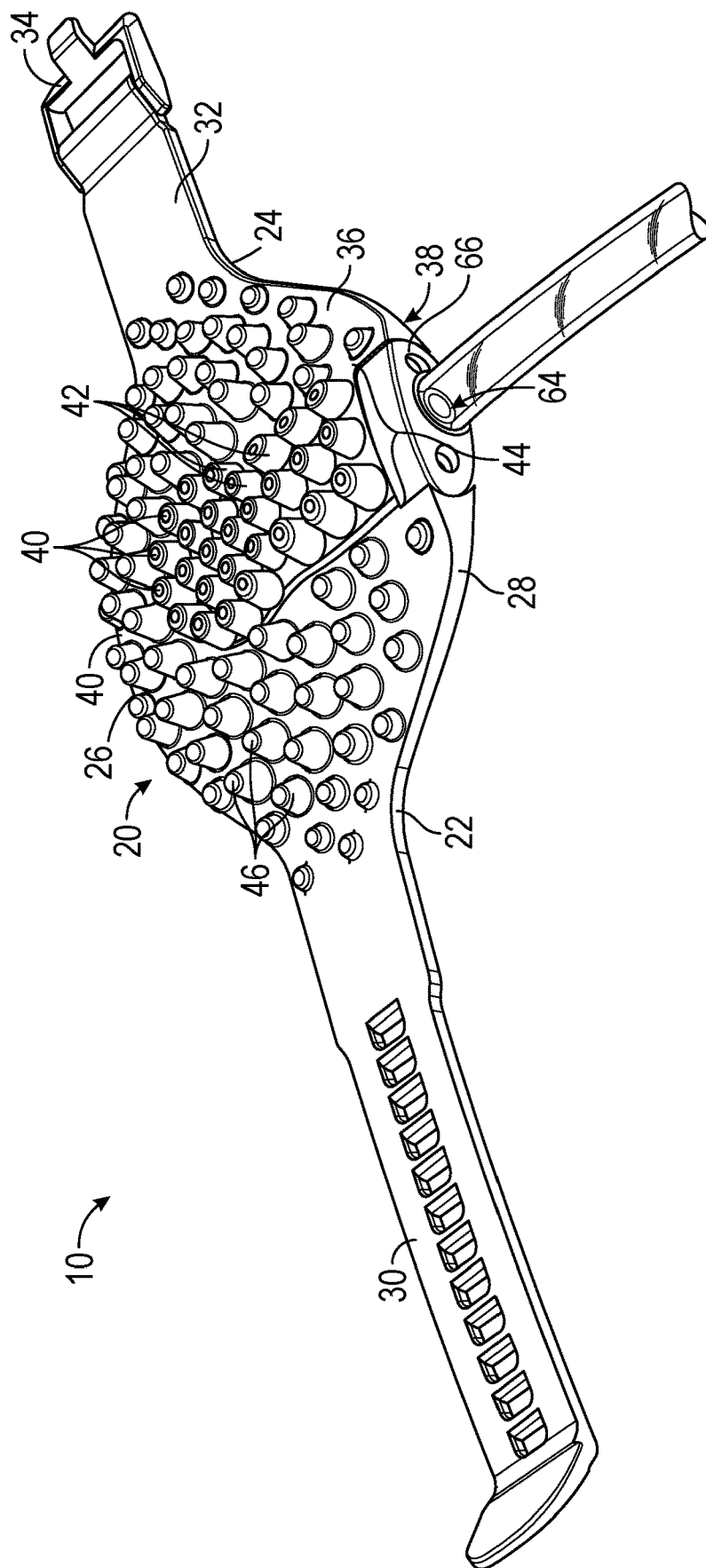


FIG. 1

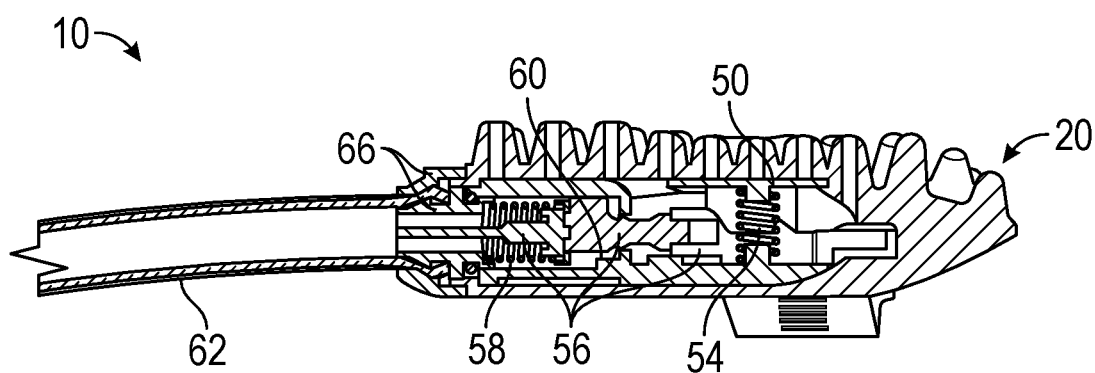


FIG. 2

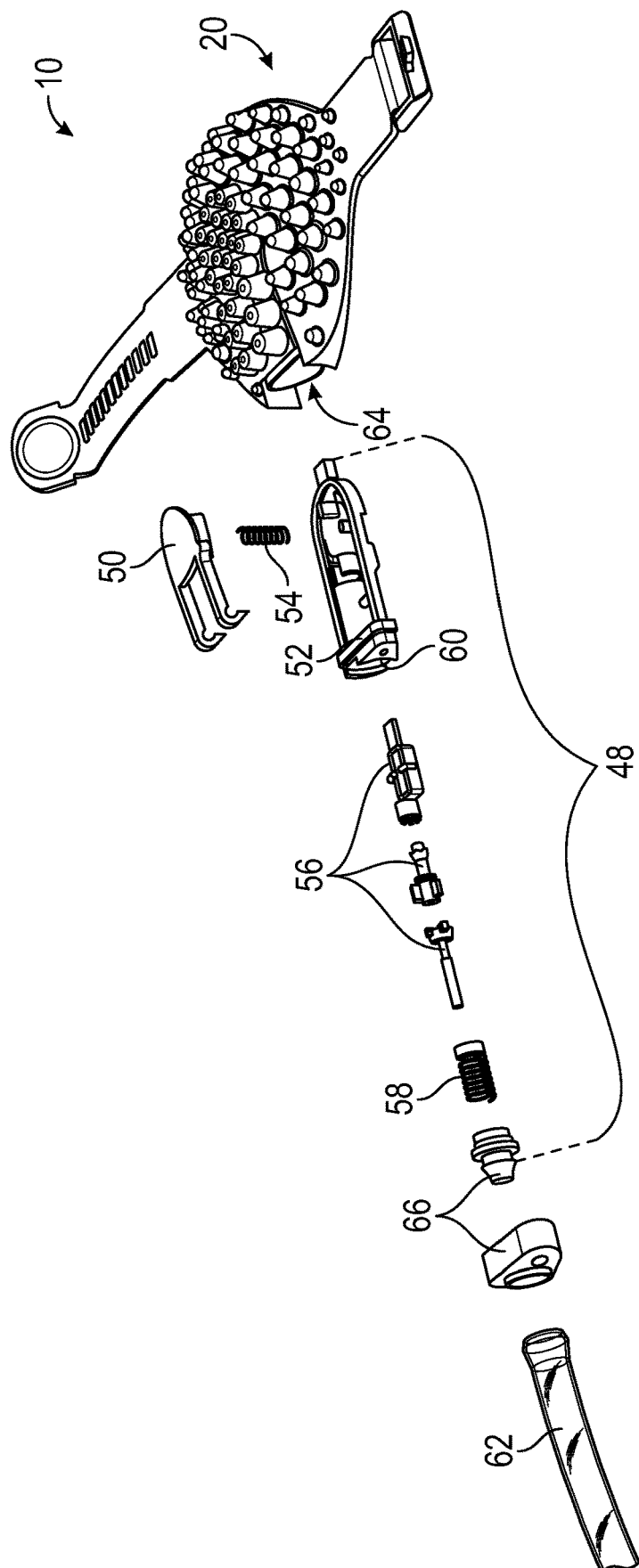


FIG. 3

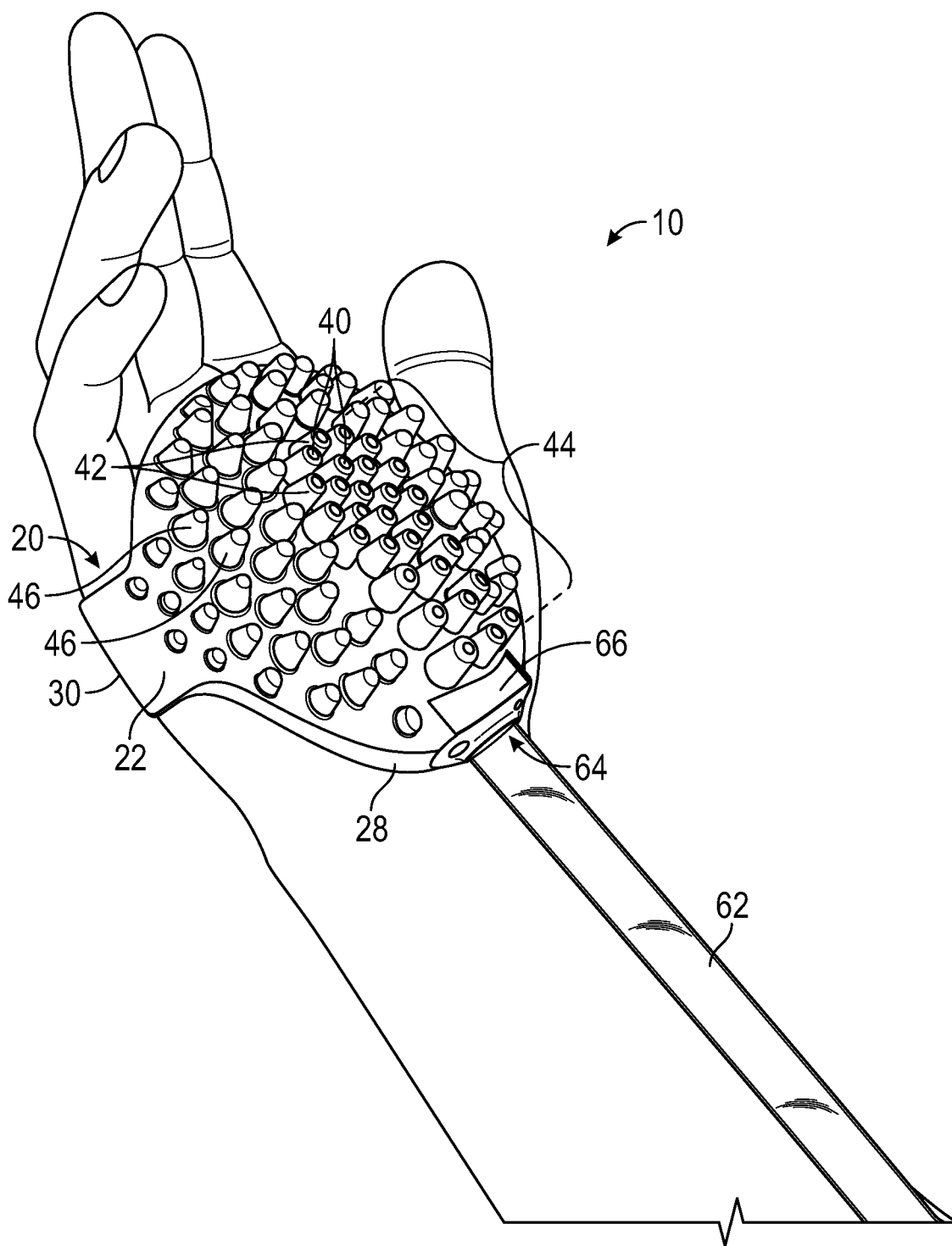
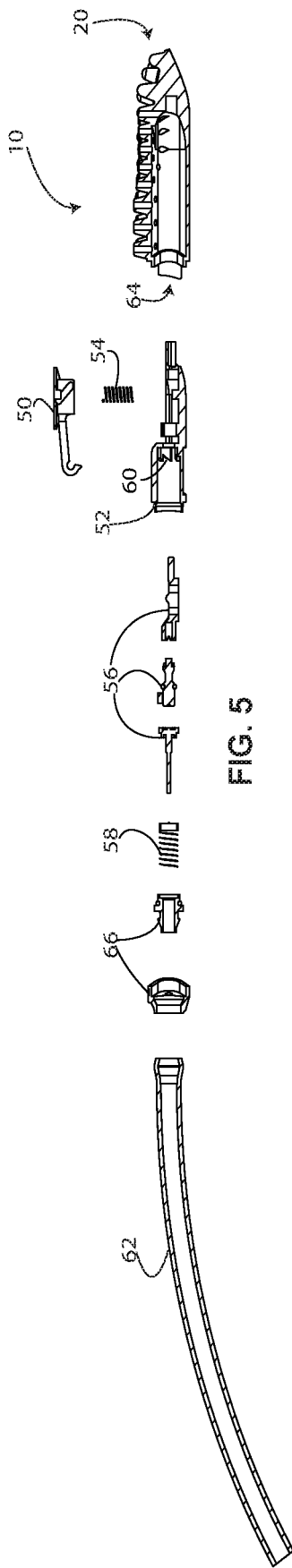


FIG. 4



1

**HAND ATTACHABLE ANIMAL WASHING
APPARATUS****CROSS-REFERENCE TO RELATED
APPLICATIONS**

This nonprovisional application claims the benefit of provisional application No. 62/396,123 filed on Sep. 13, 2016

**FEDERALLY SPONSORED RESEARCH OR
DEVELOPMENT**

Not Applicable

**INCORPORATION BY REFERENCE OF
MATERIAL SUBMITTED ON A COMPACT
DISK**

Not Applicable

BACKGROUND OF THE INVENTION

Washing animals can be troublesome and time consuming. Animals often shy away from water ejected from a hose pipe, which is sometimes noisy. Moreover, use of a hose to wash an animal, which is typical in the art, frequently applies more water than is necessary, ejects water somewhat uncontrollably, and often results in the user getting wet as well. This renders washing an animal an unpleasant experience for all involved.

What is needed is a hand attachable animal washing apparatus that enables singlehanded control of water flow through a plurality of openings to direct application of controlled water flow to an animal while maintaining the user's other hand unencumbered to comfort the animal in question, or secure said animal in place, or otherwise administer additional accouterments desirably wielded during washing. The present hand attachable animal washing apparatus therefore prevents the user from getting wet, enables more controlled application of water to the animal, and lessens discontent of the animal by operating less visibly and quieter than a hose, while enabling the user to coax and comfort the animal with said user's free hand.

FIELD OF THE INVENTION

The present invention relates to a hand attachable animal washing apparatus devised to secure to the hand of a user and enable singlehanded control of water flow therethrough. The present hand attachable animal washing apparatus further enables direct application of water into the fur of an animal without effecting an uncontrolled spray of water. The present hand attachable animal washing apparatus, therefore, enables controlled release of water for direct application to an animal for washing, while allowing a user to maintain one hand free for interaction with the animal or for use wielding additional accouterments desirable during washing.

The present hand attachable animal washing apparatus, therefore, includes a molded body member, formed of polymer which is pliable and yielding to the touch. The molded body member includes an obverse surface having a plurality of outlets and a plurality of protuberances projected perpendicularly therefrom. Each of the plurality of outlets has each of a plurality of openings disposed apically thereatop. Water is enabled passage through the molded body

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member for controlled emission through each of the plurality of openings by manual action controlling a valve assembly disposed interior to the molded body member. The valve assembly is controllable by manual depression of a compressible portion, disposed interior to the molded body member at a position appropriate to proximally overlie the center of a user's palm to which the present device is attached. A user may, therefore, actuate the device and alternately enable and disable controlled emission of water by action of clenching one hand, wherein said user's fingers depress the compressible portion. Thus a user is enabled singlehanded control of water for direct and controlled application directly into the animal's coat. Moreover, the plurality of protuberances and plurality of outlets are devised to penetrate into the animal's fur and contact the animal's epidermis, whereby the animal is brushed and stroked during the act of washing, which may comfort the animal even while water and soap is being applied into the animal's coat.

SUMMARY OF THE INVENTION

The present hand attachable animal washing apparatus, described subsequently in greater detail, has been devised to enable control of outflow of water singlehandedly while washing an animal, such as a dog or horse, for example. The present hand attachable animal washing apparatus enables use of one hand when applying water whereby the other hand may be used to secure or comfort that animal being washed. The animal is therefore more receptive to washing than is typically the case when a hose, sponge, and soap are more haphazardly applied absent the present invention.

The present hand attachable animal washing apparatus includes a molded body member attachable overtop the palm of a hand of a user. In the example embodiment set forth herein, the molded body member is generally ovoid and formed, or otherwise molded, of an impermeable polymer, such as, for example, silicone. The molded body member is therefore pliable and flexible. The molded body member includes an obverse surface and a reverse surface. The reverse surface is generally smooth and devised for comfortable fit overtop a user's palm, as will be described subsequently. The obverse surface includes a plurality of openings disposed to emit water when the molded body member is connected to a water outlet and a valve assembly, disposed interior to the molded body member, is toggled between a closed situation and an open situation, as will be described subsequently.

In the example embodiment herein described, each of the plurality of openings is disposed apically atop each of a plurality of outlets. Each of the plurality of outlets is elongate, conical, and perpendicularly disposed atop the obverse surface. The plurality of outlets is disposed in a central cluster, essentially overtop the valve assembly interior to the molded body member, and in open communication therewith, whereby flow of water through the molded body member is effective through the central cluster. Surrounding the central cluster is a plurality of protuberances, each of which plurality of protuberances is perpendicularly disposed atop the obverse surface, there devised to penetrate into the fur of an animal, stimulate the epidermis, and brush the animal's coat during washing.

The molded body member is delimited by a distal arced edge, a proximal arced edge, a first side apex, and a second side apex. The molded body member may taper in thickness towards each of the first side apex and the second side apex. A strap member is disposed upon the first side apex and

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devised to releasably secure to a connection portion disposed upon the second side apex. The strap member and connection portion may resemble a watch strap, for example, and releasable securement may be effective by action of a buckle member disposed to interconnect said strap member with the connection portion.

The molded body member is therefore positionable upon the palm of a user's hand and then securable by engagement of each of the strap member and connection portion connectable around the dorsal of said user's hand. A connecting line is disposed at the proximal arced edge, said connecting line devised for distal attachment to a water outlet, such as a tap, wherein water is introducible into the molded body member and therein controllable by action of the valve assembly.

The valve assembly includes a compressible portion disposed against the action of a first spring member. The compressible portion is disposed interior to the molded body portion proximally located in a position appropriate to overlie the center of a user's palm when said user is wearing the device. The compressible portion is depressible when a user effects a first with the hand wearing the device, and inwardly clenches said user's fingers to engage the compressible portion against the action of the first spring member. The compressible portion toggles outflow of water from the plurality of openings by moving a switch member alternately between each of a first position and a second position whereby throughflow of water is enabled and alternately disabled.

In the example embodiment depicted herein, and described subsequently in more detail below, the switch member is disposed against the action of a second spring member. When moved to the first position, the switch member is first forced in a first direction and compresses the second spring member. The second spring member is thus tensioned against the switch member, but is prevented from rebounding due to the switch member being oriented against a stop member. Throughflow of water through a valve outlet disposed in the valve assembly is now enabled, and water is thus emitted from the plurality of openings for controlled application to an animal. Subsequent depression of the compressible portion thence disengages the switch member from the stop member, whereby the second spring member rebounds and forces the switch member to the second position whereby the valve outlet is closed and the valve assembly subsequently rendered in the closed situation. Throughflow of water is thus disabled.

A user is thus enabled expedient control of throughflow of water when washing an animal, and may expediently toggle the present device to wet the animal and then rinse subsequent application of soap, for example. The polymeric molded body member is pliable and yielding, and therefore enables direct application of water into the animal's coat, and further acts as an applicator brushing the water and any applied soap into the animal's coat. The user may also use said user's other hand for holding the animal, comforting the animal, or for other actions useful in expediting washing an animal due to singlehanded operation of the present device controlling application of water for washing and rinsing said animal, as desired.

Thus has been broadly outlined the more important features of the present hand attachable animal washing apparatus so that the detailed description thereof that follows may be better understood and in order that the present contribution to the art may be better appreciated.

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For better understanding of the hand attachable animal washing apparatus, its operating advantages and specific objects attained by its uses, refer to the accompanying drawings and description.

BRIEF DESCRIPTION OF THE DRAWINGS

Figures

FIG. 1 is a plan elevation view of an example embodiment.

FIG. 2 is a longitudinal cross-section view of an example embodiment.

FIG. 3 is an exploded view of an example embodiment.

FIG. 4 is an in-use view of an example embodiment attached to a user's hand.

FIG. 5 is a side elevation exploded view of an example embodiment.

DETAILED DESCRIPTION OF THE DRAWINGS

With reference now to the drawings, and in particular FIGS. 1 through 5 thereof, example of the instant hand attachable animal washing apparatus employing the principles and concepts of the present hand attachable animal washing apparatus and generally designated by the reference number 10 will be described.

Referring to FIGS. 1 through 5 a preferred embodiment of the hand attachable animal washing apparatus 10 is illustrated.

The present hand attachable animal washing apparatus 10 has been devised to enable controlled emission of water through a plurality of openings 40 disposed in an obverse surface 36 of a molded body member 20 effected by singlehanded operation of a user wearing the device. The hand attachable animal washing apparatus 10 is attachable overlying the palm of a user whereby the molded body member 20 is disposed against the palm of the user. The plurality of openings 40 disposed in the obverse surface 36 of the molded body member 20 enables controlled outflow of water when an interior valve assembly 48 is activated between a closed situation and an open situation, whereby throughflow of water from a connecting line 62 is directable out each of the plurality of openings 40 for controlled application directly to an animal contacted with the obverse surface 36. Singlehanded operation of the valve assembly 48 enables a user to secure the animal in appropriate position with their other hand during the act of washing.

Discussing now the drawings of an example embodiment of the present device depicted herein, the present hand attachable animal washing apparatus 10, therefore, includes a generally ovoid molded body member 20 attachable overlying the palm of a user's hand. The molded body member 20 is contemplated to be polymeric and flexible, and includes a first side apex 22, a second side apex 24, a distal arced edge 26, and a proximal arced edge 28. A strap member 30 is disposed extended from the first side apex 22, said strap member 30 attachable to a connection portion 32 disposed at the second side apex 24. The strap member 30 and connection portion 32 may resemble a wrist watch strap, for example, and include a buckle member 34 disposed to releasably secure the strap member 30 and connection portion 32 together. Additional means of releasable securement of said strap member 30 and connection portion 32 are contemplated as part of this disclosure.

The molded body member 20 includes an obverse surface 36 and a reverse surface 38. The reverse surface 38 is disposed to overlie the palm of a user's hand to which the

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device is attached by action of the strap member 30 securing to the connection portion 32 around the dorsal side of the user's hand.

The plurality of openings 40 is disposed endwise upon each of a plurality of outlets 42. Each of the plurality of outlets 42 may be elongate, conical, and disposed in a central cluster 44, as depicted herein, or otherwise disposed upon the obverse surface 36. In the example embodiment shown, a plurality of protuberances 46 is disposed surrounding the central cluster 44, each of said plurality of protuberances 46 disposed to contact through the fur of the animal to which the device is applied when washing. The plurality of protuberances 46, and each of the plurality of outlets 42, act to effect brushing of the animal's coat as well as to apply water into the fur and against the epidermis.

A valve assembly 48 is disposed interiorly within the molded body member 20 in open communication with each of the plurality of openings 40. The valve assembly 48 includes a compressible portion 50 devised to alternately open and close a valve outlet 52 when depressed. The compressible portion 50 is situated in a position interior to the molded body member 20 proximally overlying the center of the user's palm when wearing the device on a hand, whereby said user may effect depression of the compressible portion 50 with said user's fingers by making a fist, and pressing centrally toward said user's palm. The compressible portion 50 is disposed against the action of a first spring member 54, said first spring member 54 disposed to return the compressible portion 50 to an uncompressed position once released. When compressed, the compressible portion 50 enables reorientation of a switch member 56 between a first position and a second position. In the preferred embodiment herein disclosed, movement of the switch member 56 between the first position and the second position includes rotational movement of the switch member 56.

When moved to the first position, the switch member 56 is forced in a first direction against the action of a second spring member 58, whereby the switch member 56 tensions said second spring member 58. The second spring member 58 is prevented from rebounding, however, by action of a stop member 60 against which the switch member 56 is rotatably oriented, whereby the valve outlet 52 is maintained open and the valve assembly 48 is rendered in the open situation. Subsequent depression of the compressible portion 50 reorients the switch member 56 by effecting rotational movement in a second direction, whereby the switch member 56 is disengaged with the stop member 60, and the second spring member 58 is enabled rebound to return the switch member 56 to the second position wherein the valve outlet 52 is closed and the valve assembly 48 is rendered in the closed situation. Alternate depressions of the compressible portion 50 therefore toggle the valve assembly 48 between the open situation and closed situation.

The connecting line 62 is disposed attached at a proximal inlet 64 medially disposed in the proximal arced edge 28 of the molded body member 20 and may be secured thereat by means of a connect housing 66. The connecting line 62 may be detachable from the connect housing 66. The connecting line 62 is distally attachable to a water outlet, such as an existing hose pipe or tap, for example. Opening said tap, or hose pipe, enables flow of water into the connecting line 62 and into the molded body member 20. Water is prevented from exiting through the plurality of openings 40 disposed upon the obverse surface 36 until the valve assembly 48 is disposed in the open situation.

Compression of the compressible portion 50 therefore enables selective opening and closing of the valve assembly

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48 between the open and closed situations whereby outflow of water is controllable singlehandedly while washing an animal. A user may, therefore, use their free hand for holding the animal in position, for coaxing or comforting the animal, or otherwise to participate in the act of washing, as desired.

What is claimed is:

1. A hand attachable animal washing apparatus attachable to a hand of a user for singlehanded control of water emitted therefrom, said hand attachable animal washing apparatus comprising:

- a molded body member;
- a reverse surface disposed upon the molded body member and configured to overlie a palm of a hand of a user when the body member is attached to the hand of the user;
- an obverse surface;
- a plurality of outlets projected up from the obverse surface, each of the plurality of outlets having an opening thereat;
- a proximal inlet in open communication with each of the plurality of openings, said proximal inlet connectable to a connecting line for conveyance of water there-through; and
- a valve assembly disposed interiorly within the body member in a position enabling singlehanded operation thereof by manual action of the same hand of the user to which the body member is fitted, said valve assembly thereby operational between an open configuration and a closed configuration to control water flow there-through;

wherein action of the valve assembly is controllable by the same hand of the user upon which the molded body is worn whereby singlehanded application of water when washing an animal is controllable at one hand.

2. The hand attachable animal washing apparatus of claim 1 wherein the valve assembly comprises:

- a compressible portion disposed against the action of a first spring member, said compressible portion compressible between a compressed position and an uncompressed position;
- a switch member in operational communication with the compressible portion, said switch member alternately positionable between a first position and a second position when the compressible portion is compressed;
- a second spring member tensioned against the switch member when the switch member is moved from the first position to the second position; and
- a stop member disposed to prevent rebound of the second spring member returning the switch member to the first position until the compressible portion is again compressed and the switch member is disengaged from the stop member;

wherein sequential compression of the compressible portion alternately renders the valve assembly in an open configuration and a closed configuration whereby control of water flow through the valve assembly is effective by singlehanded use of a user.

3. The hand attachable animal washing apparatus of claim 2 wherein a plurality of protuberances is disposed perpendicularly projected from the obverse surface proximal the plurality of outlets.

4. The hand attachable animal washing apparatus of claim 3 wherein the molded body member is polymeric and flexible, said molded body member further comprising:

- a first side apex;
- a second side apex;

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a strap member endwise disposed at the first side apex;
and

a connecting portion endwise disposed at the second side apex, said connecting portion configured for securable connection with the strap member;

wherein the strap member and connecting portion enable securement of the molded body member to the hand of the user.

5. The hand attachable animal washing apparatus of claim 4 wherein the molded body member further comprises a connect housing disposed at the proximal inlet whereby the connecting line is securable into the connect housing.

6. A hand attachable animal washing apparatus comprising:

a molded body member attachable overtop the palm of a user, said molded body member having:

an obverse surface, a reverse surface, a first side apex, a second side apex, a distal arced edge, and a proximal arced edge;

a strap member endwise disposed at the first side apex;

a connection portion endwise disposed at the second side apex, said connection portion securable to the strap member;

a plurality of outlets disposed upon the obverse surface; each of a plurality of openings disposed endwise upon each of the plurality of outlets;

a proximal inlet disposed in the proximal arced edge, said proximal inlet disposed in open communication with each of the plurality of openings;

a connecting line disposed attachable at the proximal inlet, said connecting line distally attachable to an existing water outlet; and

a valve assembly disposed interiorly within the molded body member between the proximal inlet and each of the plurality of openings, said valve assembly operable between a first position and a second position to selectively control water flow to each of the plurality of openings;

wherein action of the valve assembly is controllable by one hand of a user upon which the molded body is worn, whereby singlehanded application of water when washing an animal is controllable at one hand.

7. The hand attachable animal washing apparatus of claim 6 wherein the valve assembly comprises:

a compressible portion disposed against the action of a first spring member, said compressible portion compressible between a compressed position and an uncompressed position;

a switch member in operational communication with the compressible portion, said switch member rotatably alternately positionable between a first position and a second position when the compressible portion is compressed;

a second spring member tensioned against the switch member when the switch member is moved from the first position to the second position; and

a stop member disposed to prevent rebound of the second spring member returning the switch member to the first position until the compressible portion is again compressed and the switch member is rotatably disengaged from the stop member;

wherein sequential compression of the compressible portion alternately renders the valve assembly in an open configuration and a closed configuration whereby control of water flow through the valve assembly is effective by singlehanded use of a user.

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8. The hand attachable animal washing apparatus of claim 7 wherein the molded body member further comprises a connect housing disposed at the proximal inlet whereat the connecting line is attachable.

9. The hand attachable animal washing apparatus of claim 8 wherein the molded body member is polymeric and flexible.

10. The hand attachable animal washing apparatus of claim 9 wherein the plurality of outlets is disposed upon the obverse surface in a central cluster surrounded by a plurality of protuberances assistive in brushing an animal's coat.

11. A hand attachable animal washing apparatus comprising:

a generally ovoid, polymeric and flexible molded body member attachable overtop the palm of a user, said molded body member having:

an obverse surface, a reverse surface, a first side apex, a second side apex, a distal arced edge, and a proximal arced edge;

a strap member endwise disposed at the first side apex;

a connection portion endwise disposed at the second side apex, said connection portion securable to the strap member;

a plurality of elongate, conical outlets disposed upon the obverse surface in a central cluster;

a plurality of protuberances disposed upon the obverse surface approximal and surrounding the central cluster of the plurality of outlets;

each of a plurality of openings disposed endwise upon each of the plurality of outlets;

a proximal inlet medially disposed in the proximal arced edge, said proximal inlet disposed in open communication with each of the plurality of openings;

a connect housing disposed at the proximal inlet;

a connecting line disposed attachable at the connect housing, said connecting line distally attachable to an existing water outlet;

a valve assembly disposed interiorly within the molded body member, said valve assembly disposed between the proximal inlet and each of the plurality of openings in a position to proximally overlie the palm of a user wearing the molded body portion, said valve assembly operable between a closed configuration and an open configuration to selectively control water flow through each of the plurality of openings, said valve assembly including:

a compressible portion disposed against the action of a first spring member, said compressible portion compressible between a compressed position and an uncompressed position;

a switch member in operational communication with the compressible portion, said switch member rotatably alternately positionable between a first position and a second position when the compressible portion is compressed;

a second spring member tensioned against the switch member when the switch member is moved from the first position to the second position; and

a stop member disposed to prevent rebound of the second spring member returning the switch member to the first position until the compressible portion is again compressed and the switch member is rotatably disengaged from the stop member;

wherein action of the valve assembly is controllable by one hand of a user upon which the molded body is

worn, whereby singlehanded application of water when
washing an animal is controllable at one hand.

* * * * *

Exhibit 3

Text of Claim 1

Type 1 Infringing Product

1. A hand attachable animal washing apparatus attachable to a hand This is the preamble.

of a user for singlehanded control of water emitted therefrom, said hand attachable animal washing apparatus comprising:

a molded body member;

a reverse surface disposed upon the molded body member and configured to overlie a palm of a hand of a user when the body member is attached to the hand of the user;

an obverse surface;

a plurality of outlets projected up from the obverse surface, each of the plurality of outlets having an opening thereatop;

a proximal inlet in open communication with each of the plurality of openings, said proximal inlet connectable to a connecting line for conveyance of water therethrough; and

a valve assembly disposed interiorly within the body member in a position enabling singlehanded operation thereof by manual action of the same hand of the user to which the body member is fitted, said valve assembly thereby operational between an open configuration and a closed configuration to control water flow therethrough;

wherein action of the valve assembly is controllable by the same hand of the user upon which the molded body is worn whereby singlehanded application of water when washing an animal is controllable at one hand.

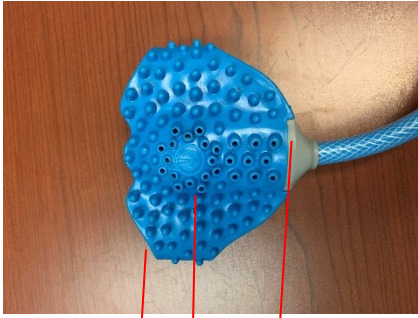
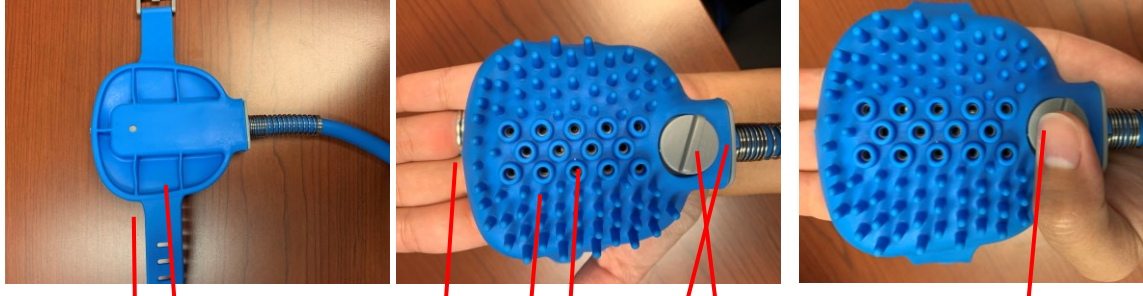


Exhibit 4

Text of Claim 1

Type 2 Infringing Product

1. A hand attachable animal washing apparatus attachable to a hand of a user for singlehanded control of water emitted therefrom, said hand attachable animal washing apparatus comprising:



a molded body member;

a reverse surface disposed upon the molded body member and configured to overlie a palm of a hand of a user when the body member is attached to the hand of the user;

an obverse surface;

a plurality of outlets projected up from the obverse surface, each of the plurality of outlets having an opening thereatop;

a proximal inlet in open communication with each of the plurality of openings, said proximal inlet connectable to a connecting line for conveyance of water therethrough; and

a valve assembly disposed interiorly within the body member in a position enabling singlehanded operation thereof by manual action of the same hand of the user to which the body member is fitted, said valve assembly thereby operational between an open configuration and a closed configuration to control water flow therethrough;

wherein action of the valve assembly is controllable by the same hand of the user upon which the molded body is worn whereby singlehanded application of water when washing an animal is controllable at one hand.