

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

KONINKLIJKE PHILIPS N.V.,

Plaintiff,

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A,”

Defendants.

Case No. 23-cv-01707

COMPLAINT

Koninklijke Philips N.V. (“Philips” or “Plaintiff”) hereby brings the present action against the Partnerships and Unincorporated Associations identified on Schedule A attached hereto (collectively, “Defendants”) and alleges as follows:

I. JURISDICTION AND VENUE

1. This Court has original subject matter jurisdiction over the claims in this action pursuant to the provisions of the Lanham Act, 15 U.S.C. § 1051, *et seq.*, 28 U.S.C. § 1338(a)-(b), and 28 U.S.C. § 1331.

2. Venue is proper in this Court pursuant to 28 U.S.C. § 1391, and this Court may properly exercise personal jurisdiction over Defendants since each of the Defendants directly targets business activities toward consumers in the United States, including Illinois, through at least the fully interactive, e-commerce stores¹ operating under the seller aliases identified in Schedule A attached hereto (the “Seller Aliases”). Specifically, Defendants have targeted sales to Illinois residents by setting up and operating e-commerce stores that target United States

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

consumers using one or more Seller Aliases, offer shipping to the United States, including Illinois, accept payment in U.S. dollars and/or funds from U.S. bank accounts and, on information and belief, have sold products using infringing and counterfeit versions of Plaintiff's federally registered trademarks to residents of Illinois. Each of the Defendants is committing tortious acts in Illinois, is engaging in interstate commerce, and has wrongfully caused Plaintiff substantial injury in the State of Illinois.

II. INTRODUCTION

3. This action has been filed by Plaintiff to combat e-commerce store operators who trade upon Plaintiff's reputation and goodwill by offering for sale and/or selling unauthorized and unlicensed products, including electric toothbrush bases and heads, razors, and other personal care goods using infringing and counterfeit versions of Plaintiff's federally registered trademarks (the "Counterfeit Products"). Defendants create e-commerce stores operating under one or more Seller Aliases that are advertising, offering for sale and selling Counterfeit Products to unknowing consumers. E-commerce stores operating under the Seller Aliases share unique identifiers establishing a logical relationship between them and that Defendants' counterfeiting operation arises out of the same transaction, occurrence, or series of transactions or occurrences. Defendants attempt to avoid and mitigate liability by operating under one or more Seller Aliases to conceal both their identities and the full scope and interworking of their counterfeiting operation. Plaintiff is forced to file this action to combat Defendants' counterfeiting of its registered trademarks, as well as to protect unknowing consumers from purchasing Counterfeit Products over the Internet. Plaintiff has been and continues to be irreparably damaged through consumer confusion, dilution, and tarnishment of its valuable trademarks as a result of Defendants' actions and seek injunctive and monetary relief.

III. THE PARTIES

Plaintiff

4. Koninklijke Philips N.V. is a public limited liability company organized under the laws of the Netherlands with a principal place of business at High Tech Campus 52 NL-5656 AG Eindhoven, Netherlands.

5. Philips is a multinational conglomerate primarily focusing on healthcare and consumer well-being markets. Since its founding in 1891, Philips has been one of the preeminent leaders in a wide range of electronics, and technology.

6. In the last decades, Philips refocused its operations to primarily address people-focused innovation in the areas of healthcare, oral care, and consumer needs. As of 2022, Philips employed more than 80,000 people worldwide and has been repeatedly recognized as a top ranked medical technology company innovator. In addition to its own products and services in the areas of professional healthcare and personal care, Philips has also licensed the use of the Philips brand to various licensees, in the areas of lighting, consumer electronics and domestic appliances. Philips' legitimate interests in protecting its trademarks also extends to products manufactured and marketed by its brand licensees.

7. Next to its professional healthcare products and services, Philips uses a variety of distinctive marks in the design and marketing of its personal care products, oral healthcare, babycare, shaving, grooming and beauty products, and other consumer goods, including those marketed by Philips' brand licensees (collectively, the "Philips Products"). As a result of this long-standing trademark use, Philips owns common law rights in its trademarks. Philips has also registered many of its trademarks with the United States Patent and Trademark Office. The Philips Products often include at least one of Philips' registered trademarks. Philips uses its trademarks in

connection with the marketing of Philips Products, including the following registered marks collectively referred to as the “Philips Trademarks.”

Registration Number	Mark	Goods and Services
5038324		<p>For: Soaps; perfumery, essential oils, hair lotions; dentifrices; toothpaste; non-medicated toilet preparations, namely, toilet water, perfume; cosmetics; shampoos, talcum powder; baby wipes; disposable wipes impregnated with scented water, facial wipes impregnated with cosmetics, moist wipes for sanitary and cosmetic purposes, moist wipes impregnated with cosmetic lotions, premoistened cosmetic wipes, wipes impregnated with a skin cleanser, wipes incorporating cleaning preparations; non-medicated preparations, creams and lotions for the body, skin and hair; nonmedicated massage creams, oils and gels; liquid talc for babies; non-medicated nipple cream; premoistened or impregnated pads, tissues and wipes for cosmetic use; disposable wipes impregnated with cleansing chemicals or compounds for personal hygiene; non-medicated baby skin cream; non-medicated body cream for mothers; non-medicated bath and shower, moisturizing and cleansing foam for mothers; non-medicated moisturizing oil for mothers, body wash for babies, shampoo for babies in class 003.</p> <p>Electrical appliances for household purposes not included in other classes, namely, electric blenders, can openers, food processors, fruit presses, mixers, electric knives; kitchen machines, electric, for food preparation, namely, mixers, blenders, food processors; component parts of the aforesaid goods in class 007.</p> <p>Razors; table cutlery made of plastic, for babies and children; hand-operated</p>

	<p>apparatus for making holes in teats; cutlery; cutlery for babies, infants and children; spoons, forks and knives; electric hair clippers, hair trimmers, scissors for cutting hair, nail clippers for babies; electric and nonelectric depilation apparatus, electric and non-electric hair clippers for personal use, hair-removing tweezers, electric and non-electric nail clippers, electric and non-electric nail files; manicure and pedicure sets, nail files and cardboard nail files; tongs for picking up teats and other objects from a sterilizer; tongs to pick up hot objects; component parts of the aforesaid goods in class 008.</p> <p>Feeding bottles, handles for baby bottles; teats, soothers for babies, pacifiers for babies, and teething rings; spoons and medical feeders for administering medicines; breast shields; incubators for babies; medical apparatus for the treatment and correction of inverted nipples; nipple protectors for breast feeding, breasts cooling pads for breast feeding, breasts heating pads for breast feeding; thermometers for medical use; component parts for all the aforesaid goods; massage apparatus, electric or non-electric; body and breast massagers, namely, electric vibrating massagers; gloves for massage, thermal massage pads; vibration generating apparatus for massage; pregnancy support belts; baby bottles; disposable feeding bottles; disposable baby bottles; component parts of feeding bottles and baby bottles; breast pumps, including manual breast pumps, electric breast pumps, battery-operated breast pumps; component parts for breast pumps; nipple shells for baby bottles; ice packs for medical purposes; parts and fittings for cups and goblets, namely, drinking straws, handles, valves, drinking spouts and lids; component parts and fittings for cups and goblets specially adapted for feeding</p>
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	<p>babies and children, namely, drinking straws, handles, valves, drinking spouts and lids; pacifier chains, namely, clips and holders for pacifiers for babies; ear and forehead thermometers for medical purposes; instruments for the removing of nasal mucus, namely, external nostril dilation devices and nasal cleansing pumps; component parts of the aforesaid goods; cups adapted for feeding babies and children in class 010.</p> <p>Multi-function sterilizers, namely, sterilizers with integrated milk and food preparers and dryers; fans, heaters and warmers for feeding bottles, foodstuffs, liquids and solids, namely, baby bottle sterilizers, microwave ovens; electrical cooking apparatus for the preparation of congee; electric kettles of both glass and stainless steel; air purifiers, humidifiers; wake up lights; guide lights and soothing lights; component parts of all aforesaid goods; hot water pitchers and bottles; sterilizers; steam sterilizers; sterilizers for feeding bottles and baby bottles, including microwave steam sterilizers and electric steam sterilizers; disposable sterilization pouches not for medical purposes; bags suitable for cooking in microwave; plastic bags for cooking in an oven; microwave sterilization pouches not for medical purposes; component parts for sterilizers; electric steamers for food and meal preparation; component parts for all the aforesaid goods in class 011.</p> <p>baby buggies; baby carriages, pushchairs, prams; covers and hoods for baby carriages in class 012.</p> <p>Precious metals and their alloys and goods in precious metals or coated therewith, not included in other classes, namely, jewelry, watches, bracelets for babies and young children; jewelry, precious stones;</p>
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	<p>horological and chronometric instruments; jewelry; clocks, alarm clocks, watches, sleep trainers watches; component parts for all the aforesaid goods in class 014.</p> <p>Furniture, including walking chairs for babies and young children; mirrors, picture frames; goods not included in other classes of wood, cork, reed, cane, wicker, horn, bone, ivory, whalebone, shell, amber, mother-of-pearl, meerschaum and substitutes for all these materials, or of plastics, namely, chairs, tables; locks and safety latches, not of metal; furniture corner protectors, not of metal; doorstops of plastic and wood; fireplace screens; bed rails, high chairs; cots for babies and young children; pillows; diaper changing mats; support pillows for use in baby car safety seats and baby car safety seats; baby head support cushions; breast feeding pillows; component parts for all the aforesaid goods; non-metal stair gates for babies and children in class 020.</p> <p>Household or kitchen utensils and containers, namely, kitchen tongs, kitchen containers; combs and sponges for household purposes; brushes, namely, clothes brushes, crumb brushes; toothbrushes, finger toothbrushes; brush-making materials; cellulose cleansing wipes; cleaning material, namely, steel wool for cleaning, cloths for cleaning; glassware, porcelain and earthenware not included in other classes, namely, beverage glassware, earthenware mugs; small domestic utensils and containers not of precious metals or coated therewith, namely, kitchen tongs, kitchen containers; containers for use in the sterilization of babies' feeding bottles and closures for such containers; combs, sponges for household purposes, heat insulated containers for household use; milk powder dispensers for household purposes; heat</p>
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	<p>insulated containers and carriers for baby feeding bottles; scrubbing brushes; utensils and containers for kitchen and household use, namely, kitchen tongs, kitchen containers; baby food containers, cups, non-spill valves for use with cups, spouts for cups; baths and potties for babies; bowls and buckets; drinking utensils, namely, flasks, horns; cleaning articles and materials, namely, cleaning cloths, grill scrapers; non-metal money boxes; component closures for aforesaid domestic utensils and containers; bags and containers for household use, namely, containers for storing and preserving of breast milk; bottles of glass for water sold empty; cups; non-metal closures for cups; brushes for cleaning parts of bottles, teats, containers; thermal and isothermic bags to keep drinking bottles and cups warm or cool, including insulated pockets; portable baths for babies; plates and divider plates; travel feeding sets with suction mats to prevent spills, namely, plates, cups; drinking straws for drinking; blenders, non-electric, for household purposes; insulated flasks; bottle drying racks for household purposes; bottle openers; sleeves for protecting drinking cups, bottles and containers; component parts for all the aforesaid goods in class 021.</p> <p>Transport by ferry, boat, rail, air; packaging articles for transportation; storage of goods; travel arrangement; distribution services, namely, delivery of goods intended for mothers, babies and young children; distribution services, namely, delivery of gift packaging and gifts; distribution services, namely, delivery of disposable napkins and diapers; the aforesaid services also provided via Internet in class 039.</p> <p>Education services in the nature of early childhood instruction, courses at the</p>
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		<p>university level; providing information about the education of babies, infants, children and mothers; training in the field of dance, child care; entertainment in the nature of baseball games, magic shows; sporting and cultural activities in the nature of baseball games, magic shows; educational services, namely, providing tutorial sessions and workshops in the field of dance, child care; the aforesaid services also provided via Internet; the aforesaid services also related to breast-feeding and well-being of babies, infants, children and mothers in class 041.</p> <p>Design and development of computers and software all in relation to babies, young children and mothers; design and development of computer hardware and software all in relation to babies, young children and mothers in class 042.</p>
4701829		<p>For: breast-nursing pads; inserts for breast shells, namely, breast pads in class 005.</p> <p>For: electronic baby monitoring devices, namely, digital enhanced cordless telecommunication (DECT) baby monitors in class 009.</p> <p>For: Feeding bottles; pacifiers for babies; feeding cups adapted for feeding babies and children; breast pumps; nipple protectors for use in breast feeding for the treatment and correction on inverted nipples; breast shields; nipple protectors for use in breast feeding in class 010.</p> <p>For: Electric beverage and food warmers for feeding bottles in class 011.</p> <p>For: brochures in the field of information for or relating to babies, young children, pregnant women, breast-feeding mothers in class 016.</p>

		For: containers for use in the sterilization of babies' feeding bottles; portable milk powder dispensers; cups for babies in class 021.
5038339		<p>For: Soaps; perfumery, essential oils, hair lotions; dentifrices; toothpaste; non-medicated toilet preparations, namely, toilet water, perfume; cosmetics; shampoos, talcum powder; baby wipes; disposable wipes impregnated with scented water, facial wipes impregnated with cosmetics, moist wipes for sanitary and cosmetic purposes, moist wipes impregnated with cosmetic lotions, pre-moistened cosmetic wipes, wipes impregnated with a skin cleanser, wipes incorporating cleaning preparations; non-medicated preparations, creams and lotions for the body, skin and hair; non-medicated massage creams, oils and gels; liquid talc for babies; non-medicated nipple cream; pre-moistened or impregnated pads, tissues and wipes for cosmetic use; disposable wipes impregnated with cleansing chemicals or compounds for personal hygiene; non-medicated baby bottom balm, non-medicated baby skin cream; non-medicated body cream for mothers; non-medicated bath and shower, moisturizing and cleansing foam for mothers; non-medicated moisturizing oil for mothers, body wash for babies, shampoo for babies in class 003.</p> <p>For: Electrical appliances for household purposes not included in other classes, namely, electric blenders, can openers, food processors, fruit presses, mixers, electric knives; kitchen appliances for food preparation, namely, mixers, blenders, food processors; component parts of the aforesaid goods in class 007.</p> <p>For: Razors; table cutlery made of plastic, for babies and children; hand-operated</p>

	<p>apparatus for making holes in teats; cutlery; cutlery for babies, infants and children; spoons, forks and knives; electric hair clippers, hair trimmers, scissors for cutting hair, nail clippers for babies; electric and non-electric depilation apparatus, electric and non-electric hair clippers for personal use, hair-removing tweezers, electric and non-electric nail clippers, electric and non-electric nail files; manicure and pedicure sets, nail files and cardboard nail files; tongs for picking up teats and other objects from a sterilizer; tongs to pick up hot objects; component parts of the aforesaid goods in class 008.</p> <p>For: Feeding bottles, handles for baby bottles; teats, soothers for babies, pacifiers for babies, and teething rings; spoons and medical feeders for administering medicine; breast shields; incubators for babies; potty chairs; medical apparatus for the treatment and correction of inverted nipples; nipple protectors for breast feeding, breasts cooling pads for breast feeding, breasts heating pads for breast feeding; thermometers for medical use; component parts for all the aforesaid goods; massage apparatus, electric or non-electric; body and breast massagers, namely, electric vibrating massagers; gloves for massage, thermal massage pads; vibration generating apparatus for massage; pregnancy support belts; baby bottles; disposable feeding bottles; disposable baby bottles; component parts of feeding bottles and baby bottles; breast pumps, including manual breast pumps, electric breast pumps, battery-operated breast pumps; component parts for breast pumps; nipple shells for baby bottles; ice packs for medical purposes; parts and fittings for cups and goblets, namely, drinking straws, handles, valves, drinking spouts and lids; component parts and fittings for cups and goblets specially</p>
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	<p>adapted for feeding babies and children, namely, drinking straws, handles, valves, drinking spouts and lids; pacifier chains, namely, clips and holders for pacifiers for babies; ear and forehead thermometers for medical purposes; component parts of the aforesaid goods; cups adapted for feeding babies and children; containers for storing and preserving of breast milk in class 010.</p> <p>For: Multi-function sterilizers, namely, sterilizers with integrated milk and food preparers and dryers; fans, heaters and warmers for feeding bottles, foodstuffs, liquids and solids, namely, baby bottle sterilizers, microwave ovens; electrical cooking apparatus for the preparation of 'congee'; electric kettles of both glass and stainless steel; air purifiers, humidifiers; wake up lights; guide lights and soothing lights; component parts of all aforesaid goods; hot water pitchers and bottles; sterilizers; steam sterilizers; sterilizers for feeding bottles and baby bottles, including microwave steam sterilizers and electric steam sterilizers; disposable sterilization pouches not for medical purposes; microwave sterilization pouches not for medical purposes; component parts for sterilizers; electric steamers for food and meal preparation; component parts for all the aforesaid goods in class 011.</p> <p>For: baby buggies; baby carriages, pushchairs, prams; covers and hoods for baby carriages; child safety harnesses for vehicle seats in class 012.</p> <p>For: Precious metals and their alloys and goods in precious metals or coated therewith, not included in other classes, namely, jewelry, watches, bracelets for babies and young children; jewelry, precious stones; horological and chronometric instruments; jewelry; clocks, alarm clocks, watches, sleep trainers</p>
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	<p>watches; component parts for all the aforesaid goods in class 014.</p> <p>For: Furniture, including walking chairs for babies and young children; mirrors, picture frames; locks and safety latches, not of metal; fireplace screens; bed rails, high chairs; cots for babies and young children; pillows; support pillows for use in baby car safety seats; baby head support cushions; breast feeding pillows in class 020.</p> <p>For: Toothbrushes, finger toothbrushes; brush-making materials; cellulose cleansing wipes; containers for use in the sterilization of babies' feeding bottles and closures for such containers; combs; heat insulated containers and carriers for baby feeding bottles; baby food containers, cups, non-spill valves for use with cups, spouts for cups; baths and potties for babies; bowls and buckets; heat insulated containers and carriers for baby feeding bottles; cups; brushes for cleaning parts of bottles, teats, containers; portable baths for babies; plates and divider plates; drinking straws for drinking; blenders, non-electric, for household purposes; insulated flasks; bottle openers in class 021.</p> <p>For: Storage of goods; travel arrangement; the aforesaid services also provided via internet in class 039.</p> <p>For: Providing information about the education of babies, infants, children and mothers; the aforesaid services also provided via internet; the aforesaid services also related to breast feeding and well-being of babies, infants, children and mothers in class 041.</p> <p>For: Design and development of computers and software; design and development of computer hardware and software in class 042.</p>
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5343144		<p>For: Soaps; perfumery, essential oils, hair lotions; dentifrices; toothpaste; non-medicated toilet preparations, namely, toilet water, perfume; cosmetics; shampoos, talcum powder; baby wipes, disposable wipes impregnated with scented water in the nature of cosmetic wipes, facial wipes impregnated with cosmetics in the nature of cosmetic wipes, non-medicated moist wipes for sanitary and cosmetic purposes for personal hygiene, moist wipes impregnated with cosmetic lotions in the nature of cosmetic wipes, pre-moistened cosmetic wipes, wipes impregnated with a skin cleanser, disposable wipes incorporating cleaning preparations for personal hygiene and household use; non-medicated preparations, namely, creams and lotions for the body, skin and hair; non-medicated massage creams, oils and gels; liquid talcum powder for babies; non-medicated breast nipple cream; pre-moistened and impregnated pads, tissues and wipes impregnated with cleaning preparations for cosmetic use; disposable wipes impregnated with cleansing chemicals or compounds for personal hygiene; non-medicated baby skin cream; non-medicated body cream for mothers; non-medicated bath and shower, moisturizing and cleansing foam for mothers; non-medicated moisturizing oil for mothers, body wash for babies, shampoo for babies in class 003.</p> <p>For: Food for babies; nutritional supplements for humans; medical plasters, medical dressings; material for stopping teeth; dental wax for dentists; all-purpose disinfectants; baby food, vitamin and mineral preparations for medical use; pre-moistened disposable impregnated antiseptic wipes and medicated wipes, medicated moist wipes impregnated with pharmaceutical lotions; disinfectant wipes; antiseptic and disinfectant wipes for</p>
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	<p>medical use; nursing pads for breast-feeding; pre-moistened medicated tissues and wipes impregnated with pharmaceutical lotions and creams; powdered milk for babies; disposable napkins in the nature of diapers made of paper or cellulose for infants and babies in class 005.</p> <p>For: Electrical appliances for household purposes not included in other classes, namely, electric food blenders, electric can openers, electric fruit presses, electric salt and pepper mills and electric mixers, electric knives; electric kitchen machines for food preparation, namely, mixers, food blenders, food processors; structural replacement component parts of the aforesaid goods in class 007.</p> <p>For: Razors; table cutlery made of plastic, for babies and children; hand-operated apparatus for making holes in teats; cutlery; cutlery for babies, infants and children; spoons, forks and knives; electric hair clippers, hair trimmers, scissors for cutting hair, nail clippers for babies; electric and non-electric depilation appliances, electric and non-electric hair clippers for personal use, hair-removing tweezers, electric and non-electric nail clippers, electric and nonelectric nail files; manicure and pedicure sets, electric and non-electric nail files and cardboard nail files; tongs for picking up teats and other objects from a sterilizer; tongs to pick up hot objects, namely, teats, baby bottles; kitchen tongs; structural replacement component parts of the aforesaid goods in class 008.</p> <p>For: Blank magnetic data carriers, blank compact discs, blank DVDs and other blank digital storage media; data processing equipment, computers; computer operating software, namely, for</p>
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	<p>use in digital enhanced cordless telecommunications (DECT) baby monitors; scales for babies; digital photo frames; digital enhanced cordless telecommunications (DECT) baby monitors; thermometers and electronic thermometers, other than for medical purposes; downloadable electronic publications provided from databases and the Internet, namely, newspapers and magazines in the field of babies, babies and nursing; blank digital storage media; computer software and firmware, namely, operating system programs, data synchronization programs and application software for personal and handheld computers, namely, for use in connection with digital enhanced cordless telecommunication (DECT) baby monitors; structural replacement component parts for all the aforesaid goods, except hearing aids and related goods; electrical baby monitors; baby monitors; chargers for electric batteries, battery chargers; batteries and rechargeable batteries; central processing units for baby monitors, electrical apparatus, namely, charging stations for baby monitors; structural replacement component parts for baby monitors; thermometers in the form of teats, not for medical purposes; bath and room thermometers; measuring apparatus, namely, stress gauges for testing furniture in class 009.</p> <p>For: Feeding bottles, handles specially adapted for baby bottles; teats, soothers, and pacifiers all being in the nature of pacifiers; teething rings; spoons and medical feeders in the nature of spoons all for administering medicines; breast shells for nipple alignment for use in breastfeeding; incubators for medical purposes; apparatus for the treatment and correction of inverted nipples in the nature of breast shells for nipple alignment for use</p>
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	<p>in breastfeeding; nipple protectors, breasts cooling pads, breasts heating pads all being for breastfeeding medical purposes; thermometers for medical use; structural replacement parts for all the aforesaid goods; condoms; massage apparatus, electric or non-electric; massage apparatus, namely, body and breast massagers; gloves for massage, thermal massage pads in the nature of heating pads for medical purposes; vibration generating apparatus for massage, namely, electric vibrating massagers; pregnancy support belts for medical purposes; baby bottles; disposable feeding bottles; disposable baby bottles; parts of feeding bottles and baby bottles; breast pumps, including manual breast pumps, electric breast pumps, battery-operated breast pumps; structural replacement parts for breast pumps; nipple shells for nipple alignment for use in breastfeeding; ice packs for medical purposes; structural replacement parts for cups and goblets for dispensing medicines; pacifier chains, namely clips and holders specially adapted for pacifiers; ear and forehead thermometers for medical purposes; instruments for the removing nasal mucus, namely, external nostril dilators and nasal cleansing pumps in the nature of nasal aspirators; structural replacement parts of the aforesaid goods; cups adapted for the feeding of babies and children in class 010.</p> <p>For: Multi-function sterilizers, namely, sterilizers that also feature an integrated milk and food preparer and dryer; electric fans, heaters and warmers for feeding bottles, foodstuffs, liquids and solids in the nature of foods and beverages; electrical cooking apparatus in the nature of rice cookers for the preparation of rice porridge in the nature of congee; electric kettles of both glass and stainless steel; air purifiers, humidifiers, electric hot water pitchers and</p>
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	<p>bottles; sterilizers; steam sterilizers; sterilizers for feeding bottles and baby bottles, including microwave steam sterilizers and electric steam sterilizers; disposable sterilization pouches not for medical use; plastic bags for cooking in an oven; disposable sterilization pouches for use in a microwave oven and not for medical purposes; structural replacement parts for sterilizers; electric steamers for food and meal preparation; structural replacement parts for all the aforesaid goods in class 011.</p> <p>For: baby buggies in the nature of prams; baby carriages, pushchairs, prams; covers and hoods specially adapted for affixation to baby carriages in class 012.</p> <p>For: Precious metals and their alloys and goods in precious metals or coated therewith, not included in other classes, namely, jewelry, watches, bracelets for babies and young children; jewelry, precious stones; horological and chronometric instruments; clocks, alarm clocks, watches, sleep training watches; structural replacement parts for all the aforesaid goods in class 014.</p> <p>For: printed matter, namely, signboards of paper, books, curricula, newsletters, informational cards and brochures relating to babies, young children, pregnant women, breast-feeding mothers and young mothers; newspapers, magazines in the field of information for or relating to babies, young children, pregnant women, breast-feeding mothers and young mothers; disposable paper wipes for the cleaning of babies and toddlers not impregnated with chemicals ; disposable bibs made of paper; table napkins of paper; plastic bags for packaging ice; bags suitable for cooking in microwave in class 016.</p>
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	<p>For: Leather and imitations of leather, and goods made of these materials and not included in other classes, namely, key cases, briefcases; trunks and travelling bags; umbrellas and parasols; harnesses; slings for carrying babies; baby harnesses; bags for carrying items for changing babies; diaper bags; baby carriers worn on the body for carrying babies and infants; structural replacement component parts of all the aforesaid goods in class 018.</p> <p>For: Furniture, including walking chairs for babies and young children; mirrors, picture frames; goods not included in other classes of wood, cork, reed, cane, wicker, horn, bone, ivory, whalebone, shell, amber, mother-of-pearl, meerschaum and substitutes for all these materials, and of plastics, namely, chairs, tables; locks and safety latches, not of metal; fitted furniture corner protectors, not of metal; doorstops of plastic and wood; fireplace screens; bed rails, high chairs; cots for babies and young children; pillows; diaper changing mats; head support pillows for use in baby car safety seats and baby car safety seats; baby head support cushions; breast feeding pillows for cradling, supporting, propping and feeding babies not for medical or therapeutic purposes; structural replacement component parts for all the aforesaid goods; non-metal stair safety gates for babies and children in class 020.</p> <p>For: Household or kitchen utensils and containers, namely, kitchen containers; combs and sponges for household purposes; brushes, namely, clothes brushes, crumb brushes; toothbrushes, finger toothbrushes being toothbrushes that are worn on a finger; brush-making materials; cellulose cleansing wipes; cleaning material, namely, steel wool for cleaning, cloths for cleaning; glassware, porcelain and earthenware not included in other</p>
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	<p>classes, namely, beverage glassware, earthenware mugs; small domestic utensils and containers not of precious metals or coated therewith, namely, kitchen tongs, kitchen containers; containers for household use in the sterilization of babies' feeding bottles and closures for such containers; heat insulated containers for household use; milk powder dispensers for household purposes; heat insulated containers for baby feeding bottles; scrubbing brushes; utensils and containers for kitchen and household use, namely, kitchen tongs, kitchen containers; baby food containers for household use, cups, non-spill valves of plastic and silicone for use with cups for babies and children, pouring spouts for cups for household use; infant bathtubs and potties for babies; bowls and buckets; drinking utensils, namely, flasks, horns; cleaning articles and materials, namely, cleaning cloths, grill scrapers; non-metal money boxes; component closures for aforesaid domestic utensils and containers, namely, container closures sold as an integral component of kitchen containers; bags and containers for household use, namely, containers for storing and preserving of breast milk; reusable bottles of glass for water sold empty; non-metal closures for cups sold as an integral component of cups; brushes for household use for cleaning parts of bottles, teats, containers; thermal and isothermic bags and insulated pockets in the nature of bags to keep the contents of drinking bottles and cups warm or cool; portable bathtubs for babies; plates and plates with integral dividers; travel feeding sets with suction mats to prevent spills comprised of plates, cups and drinking straws for drinking; non-electric food blenders for household purposes; insulated flasks; bottle drying racks for household purposes; bottle openers; insulated sleeve holders for drinking cups, bottles and beverage</p>
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	<p>containers; structural replacement component parts for all the aforesaid goods in class 021.</p> <p>For: Textiles and textile goods, not included in other classes, namely, coasters of textile, face towels of textile; woven textile wipes not impregnated with chemicals or compounds; table napkins made of textile; place mats not of paper; cotton cloth, flax cloth; corduroy fabric; felt; towels of textile; unfitted covers for furniture not of paper; bathing mitts; textile banners in class 024.</p> <p>For: Clothing, namely, tops, bottoms, jackets, one-piece garments for infants and children; footwear; headgear, namely, hats and caps; scarves; disposable bibs made of plastic in class 025.</p> <p>For: Games and playthings, namely, chess games, dolls; gymnastic and sporting articles not included in other classes, namely, gymnastic apparatus, baseball bats; decorations for Christmas trees; toys, games and rattles, namely, crib toys, baby rattles; dolls in class 028.</p> <p>For: Packaging articles for transportation; storage of goods; distribution services, namely delivery of goods intended for mothers, babies and young children; distribution services, namely, delivery of gift packaging and gifts; distribution services, namely, delivery of disposable napkins and diapers in class 039.</p> <p>For: Education services, namely, providing classes, seminars, workshops in the field of breast feeding and well-being of babies, infants, children and mothers; providing education information and on-line education information about the education of babies, infants, children and mothers; providing training and on-line training in</p>
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		<p>the field of breast feeding and well-being of babies, infants, children and mothers; providing sporting and cultural activities, namely, organization of soccer games, organization of cultural shows in class 041.</p> <p>For: Design and development of computer hardware and software all in relation to babies, young children and mothers in class 042.</p> <p>For: Hygienic and beauty care for human beings and animals; providing breast-feeding information; providing of beauty treatments and health treatments in the nature of body scrubs, massages; hygienic and beauty care services; rental of medical equipment, namely, breast pumps, parts for breast pumps, bags specially adapted for carrying breast pumps in class 044.</p>
5500086	DIAMONDCLEAN	<p>For: Electric and non-electric toothbrushes, including denture brushes, and their structural and replacement parts; replaceable toothbrush heads; apparatus for cleaning teeth and gums, namely, toothbrushes; apparatus for cleaning teeth and gums using water or air and water for home use; tongue cleaning instruments in the nature of brushes and scrapers for personal care in class 021.</p>
5527143	DIAMONDCLEAN SMART	<p>For: Electric and non-electric toothbrushes, including denture brushes, and their structural and replacement parts; replaceable toothbrush heads; apparatus for cleaning teeth and gums, namely, toothbrushes; apparatus for cleaning teeth and gums using water or air and water for home use; tongue cleaning instruments in the nature of brushes and scrapers for personal care in class 021.</p>

4836282		For: Toothbrush head for electric toothbrushes in class 021.
3087004	NORELCO	For: Men's electric and battery operated razors; men's razors accessories, namely, rechargeable battery-operated razors with corded charging and cord adapter stand sold as a unit, electric razors and replacement parts thereof in the nature of replacement heads, men's electric and manual hair trimming devices, namely, beard and moustache trimmers, nose, ear and eyebrow trimmer, and hair clipper; women's electric hair depilator in class 008.
3087005		For: Men's electric and battery operated razors; men's razors accessories, namely, rechargeable battery-operated razors with corded charging and cord adapter stand sold as a unit, electric razors and replacement parts thereof in the nature of replacement heads, men's electric and manual hair trimming devices, namely, beard and moustache trimmers, nose, ear and eyebrow trimmer, and hair clipper in class 008.
5526862	NORELCO	For: Cleaning fluids for cleaning shavers, hair trimmers, beard trimmers and hair clippers, with said cleaning fluids being sold in filled cartridges in class 003. For: Electric shavers; non-electric shavers; battery powered shavers and beard trimmers; hair trimmers, beard trimmers, hair clippers; apparatus for shaving and trimming body hair, namely, body hair shavers and trimmers; hair trimmers, namely, nose and ear hair trimmers; epilators, namely, epilatory appliances;

		<p>blades and shaving foils for electric shavers; hair clippers; cleaning devices for shavers, hair trimmers, hair clippers and beard trimmers, namely, hand-operated cleaning scraping tools for cleaning the aforementioned, brushes for cleaning electric hair clippers and trimmers; replacement parts for electric and non-electric shavers, hair trimmers, hair clippers and beard trimmers, namely, replacement heads; cases and holders specially adapted for the aforesaid goods; parts and fittings for the aforesaid goods in class 008.</p> <p>For: Battery charging devices for electrically operated shaving and hair cutting appliances, namely, battery chargers and cleaning stands sold as a unit for use with electrically operated shavers and hair cutting accessories; electrical connections for cleaning stand for use with electrically operated shavers and hair cutting accessories; power cords in the nature of electric cables; battery chargers, namely, battery charging stations for electrically operated shavers and hair cutting accessories in class 009.</p>
3864315		<p>For: Cleaning, polishing, scouring and abrasive preparations; dentifrices; shaving lotions in class 003.</p> <p>For: Baby food; vitamin and mineral preparations, namely, supplements, included in this class, but excluding ingestible and digestible supplements distributed through direct-to-consumer retail channels and not marketed primarily to healthcare professionals; medical plasters, breast pads in class 005.</p> <p>For: Filters and pumps not included in other classes, namely, filters for air-cleaners and air purifiers; electric apparatus for domestic use not included in other</p>

		<p>classes, namely, electric blenders, coffee grinders, food processors, fruit presses, electric food grinders and mixers; structural parts of the said goods not included in other classes in class 007.</p> <p>For: Razors, hair-clippers; structural parts of the aforesaid goods not included in other classes in class 008.</p> <p>For: Computer software for lighting systems for the purpose of driving and controlling lighting system; Software for medical applications, namely, software for recording, checking, distributing, analyzing and reporting medical images and information; software for supporting medical diagnostics and treatment, namely, medical diagnostics involving images scanned by diagnostic imaging equipment irrespective of modality or anatomy; software for image and information management, namely, software used in the field of Picture Archiving and Communication System; computer software programs for use in database management of medical records, Software for use in image guided and cardiac surgery; Software used for integrated viewing and processing images and patient related data at any workspot, and for workflow enhancing in the fields of radiography and radiology; software to permit a user to retrieve, display, and browse medical images and medical information; Software and interfaces for searching, navigating, storing, arranging, reproducing and browsing data and data files and for database management; x-ray apparatus and x-ray tubes, not for medical purposes; electric light dimmers; optical fibres; electronic lighting ballasts, electric starters and lamp igniter units for lighting purposes; accumulators; electric wires and cables; electric dry cells and batteries and chargers for the same; infrared sensors and</p>
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	<p>infrared remote controllers; teaching apparatus, namely, movie, multimedia projectors; code readers, namely, bar code readers, magnetic coded card readers; apparatus, devices, instruments and articles for recording, reproducing, transmitting and amplifying sound and/or images and/or data and/or other signals, namely, televisions and radios, computers and multimedia computers, digital media players, MP3 players and accessories for the same, printers and webcams, CD-ROM/DVD and magneto-optical disc player and recorder drives, CD-ROM disc, DVD and magneto-optical discs, recorders and play-back apparatus, video recorders, remote controls for lighting systems, stereos, DVD players, computer game machines, sound recording apparatus, video disc players, loudspeakers, loudspeaker horns; loudspeaker cabinets, microphones, compact discs, and pre-recorded tapes featuring educational information, music; telephones, namely, mobile phones; telephone answering machines; dictating machines; computers and computer software for analyzing, measuring, controlling and visualizing medical applications and medical test results; communication and security systems, namely, cameras, monitors, theft and burglar alarms; signaling equipment, namely, emergency signal transmitters, signal bells; photo cameras; laser pointing devices; baby monitors in class 009.</p> <p>Surgical, medical, instruments and apparatus, namely, medical scanners, CT scanners, gamma ray imaging apparatus, respiration monitoring and flow measurement devices, namely, sleep and respiratory therapy devices; patient interface devices and accessories, namely, textile headgear specifically adapted for use with medical ventilator mask interfaces, oxygen masks for medical use</p>
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	<p>and medical electrodes; oxygen generation and delivery devices for medical purposes, namely, oxygen inhalators, hyperbaric oxygen chambers, oxygen inhalers sold empty; diagnostic sleep monitors and sensors; invasive and non-invasive ventilation devices; patient information management devices, namely, heart monitors, medical apparatus and instruments for monitoring oxymetry, gas analysis, vital signs, blood properties and respiratory events; portable patient monitors, namely, heart monitors, blood pressure monitors, fetal pulse monitors; gas and respiratory monitoring devices; infant related diagnostic, treatment, and growth/development support devices, namely, MRI diagnostic apparatus, orthopedic supports, apparatus for magnet therapy; respiratory drug delivery devices; and asthma/allergy related products, namely, inhalers for medical purposes, anaesthetic inhalers, medical apparatus for diagnosing and treating respiratory conditions, MRI scanners, radiology, ultrasound and fluoroscopy scanners, defibrillators, patient monitors, namely, heart monitors, blood pressure monitors, patient monitors for critical care and anesthesia, electrocardiographs; lights and lamps for medical, curative, surgical, dental and veterinary use, namely, sensory light therapy units, medical examination lamps; ultraviolet and infrared irradiation apparatus, devices and instruments for medical use, namely, ultraviolet lamps for medical purposes, ultraviolet radiator units for therapeutic purposes, infrared radiator units for therapeutic purposes; X-ray apparatus, tubes, installations and instruments for medical use, namely, X-ray diagnostic apparatus, X-ray CT scanners; medical hearing instruments; structural parts of the aforesaid articles not included in other classes; feeding bottles; teats; pacifiers and teething rings; spoons for</p>
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	<p>administering medicines; breast pumps; nursing appliances for use in breast feeding, namely, breast shields and nipple protectors; thermometers for medical use; sterilizing units for medical purposes; structural parts for all the aforesaid goods in class 010.</p> <p>For: Installations, devices, apparatus, instruments and articles for lighting, heating, cooking, refrigerating, freezing, drying, ventilating, namely, electric lamps, lamp shades, lamp armatures, lighting fixtures; air humidifiers and dehumidifiers; air-conditioning apparatus, air cleaners, electrical apparatus and instruments for domestic use not included in other classes, namely, toasters, coffee and tea makers, electric grills, electric woks, electric rice cookers, structural parts and accessories of the aforesaid goods not included in other classes; apparatus and devices for sterilizing, heating, lighting, cooking, namely, dehydrators, light filters and infrared light filters, heaters and warmers for feeding bottles, foodstuffs, liquids and solids, namely, electric heaters for infant food, portable thermal self-heating pouch for the purpose of heating food; water sterilizers and sterilizers for baby feeding bottles; parts for all the aforesaid goods; electric hot water bottles in class 011.</p> <p>For: Small domestic utensils and containers not of precious metal or coated therewith, namely, strainers, sieves, containers for household use, cups and drinking vessels adapted for feeding babies and children, pouring spouts for cups, adapted for feeding babies and children, cups for food, non-electric heat insulating jugs, feeding bottle brushes, non-electric heaters for feeding bottles, feeding cups for children; apparatus and instruments for dental cleaning, namely, electric toothbrushes, parts of and accessories to aforesaid goods,</p>
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	<p>namely, carrying pouches, and brush heads for electric toothbrushes, timers for indicating desired brushing times that are structurally incorporated into electronic toothbrushes, interdental brushes for cleaning the teeth, interdental cleaners, namely, interdental stimulators for cleaning the teeth and gums; household containers for use in the sterilization of babies' feeding bottles and closures for such containers; sponges not for surgical use, namely, bath sponges, scouring sponges; bottles, sold empty, adapted for feeding babies; heat insulated containers for food or beverages; milk powder dispensers; heat insulated containers and carriers for baby food and beverages; brushes, namely, brushes for cleaning babies feeding bottles; vacuum flasks; structural parts of the aforesaid articles not included in other classes in class 021.</p> <p>For: Advertising; business management; business administration in class 035.</p> <p>For: Financial affairs, namely, financial analyses, financial asset management, financing, financial services for purchases made "on-line" and payments, namely, providing electronic processing and transmission of bill payment data, providing electronic processing of credit card transactions; money transfers; hire-purchase financing in class 036.</p> <p>For: Repair services of medical machines and apparatus, namely, medical scanners, gamma ray imaging apparatus, respiration monitoring and flow measurement devices, defibrillators, patient monitors; installation services of medical apparatus, namely, medical scanners, gamma ray imaging apparatus, respiration monitoring and flow measurement devices, defibrillators, patient monitors, technical support services, namely, repairing and upgrading of</p>
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		<p>computer system hardware, computer printers, and computer hardware and software for medical apparatus; providing maintenance and repair services for medical apparatus; servicing of medical apparatus and diagnostic equipment in class 037.</p> <p>For: Education, namely, conducting of educational seminars relating to medical matters and health, teaching services relating to the medical field and health, providing of training services relating to health and safety, providing training related to the use of medical equipment in class 041.</p> <p>For: Medical services; hygienic and beauty care for human beings in class 044.</p> <p>For: Legal services in class 045.</p>
5038342		<p>For: Bleaching preparations for laundry use and other substances for laundry use, namely, laundry detergent; descaling preparations for household products; cleaning, polishing, scouring and abrasive preparations; non-medicated preparations, creams and lotions for the body, skin or hair; perfumery, essential oils, cosmetics and hair lotions; cosmetic body cream; cosmetic bath, shower, moisturizing and cleansing foams; cosmetic moisturizing oil; cosmetic body wash; cosmetic balms; cosmetic lotions; deodorants for human beings; liquid talc for toilet use; non-medicated massage creams, oils and gels; non-medicated talcum powder; non-medicated toilet preparations; perfumes; shampoos; shaving lotions; soaps; sun care lotion and after-sun lotion; dentifrices; toothpaste; cosmetic tooth whiteners; cosmetic bleaching preparations, hair bleaching preparations, and tooth whitening kits comprising tooth bleaching preparations, all for cosmetic purposes;</p>

	<p>non-medicated balm for baby bottoms; baby cremes, non-medicated; shampoo for babies; nipple cream, non-medicated; disposable wipes impregnated with cleansing chemicals or compounds for toilet use; baby wipes for cosmetic use; cologne impregnated disposable wipes; facial wipes impregnated with cosmetics; moist wipes for toilet and cosmetic purposes; pre-moistened or impregnated cleansing pads, tissues or wipes for toilet use; aromatic oils and essences; non-medicated salts, lotions, oils, essences, creams and sprays, for promoting sleep in class 003.</p> <p>For: Chemical disinfectants other than disinfectant soaps for household purposes; all-purpose disinfectants for household purposes; vitamin preparations and concentrates; vitamin and mineral supplements, excluding ingestible and digestible supplements distributed through direct-to-customer retail channels and not marketed primarily to healthcare professionals; sanitary preparations for medical purposes; dental prophy paste; dietetic food and substances adapted for medical or veterinary use, food for babies; plasters for medical purposes, materials for dressings, namely, medical dressings, cosmetic dressings, wound dressings; material for stopping teeth, dental wax; all-purpose disinfectants; preparations for destroying vermin; fungicides, herbicides; antiseptic wipes impregnated with a pharmaceutical lotion, moist wipes impregnated with a pharmaceutical lotion, sanitizing wipes, wipes for medical use; breast-nursing pads; inserts for breast shells; infants and babies' disposable napkins made of paper or cellulose; breast shells; sterilized wet wipes; baby diapers; tissues and wipes impregnated with pharmaceutical lotions and creams; milk powder for babies in class 005.</p>
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	<p>For: Appliances for household purposes not included in other classes, namely, electric food blenders, electric can openers, electric food processors, electric fruit presses, electric salt mills, electric pepper mills and electric mixers; electric knives; electric kitchen appliances for dicing and mincing food not included in other classes; electric dust removing apparatus for cleaning purposes, namely, vacuum cleaners; vacuum cleaner hoses, vacuum cleaner bags and other parts of vacuum cleaners in this class only; carpet cleaning machines; floor cleaning machines; steam cleaning machines; ironing machines and ironing presses; parts of the aforesaid goods in class 007.</p> <p>For: Razors; electric and non-electric hair clippers and hair trimmers; scissors to trim hair; nail clippers; electric or non-electric depilation appliances, also serving as nose cleaners; electric or non-electric hair-removing tweezers; electric or non-electric nail files; electric or non-electric manicure and pedicure sets; hand tools, namely, punches for making holes in teats; hand tools, namely, tongs for picking up teats and other objects from a sterilizer; electric irons and steam irons; electric hair stylers; parts of the aforesaid goods in class 008.</p> <p>For: Electric and electronic components, namely, diodes, resistors, capacitors, transistors, conduits, conductors and acoustic couplers, magnetic couplers, optical couplers, electric couplings; television apparatus, namely, television sets, antennas for televisions, television monitors; telephones, mobile phones; telephone answering machines; dictating machines; control apparatus in the nature of remote controls for controlling lighting systems and computer software programs for controlling lighting systems, not</p>
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	<p>included in other classes; light-emitting diodes (LEDs), LED modules fully or partially consisting of integrated LEDs, OLEDs, polymer light-emitting diodes; optical control apparatus, namely, optical inspection apparatus for industrial use, thermal control apparatus, namely, digital thermostats; apparatus for recording, transmission or reproduction of sound or images; loudspeakers, loudspeaker horns; magnetic data carriers, namely, blank magnetic data carriers, recording discs, namely, blank recording discs; compact discs, namely, blank compact discs, DVDs, namely, blank DVDs; data processing equipment, computers; computer software for use in database management, use as a spreadsheet, word processing; computer mice, trackballs, touch pads and computer joysticks; remote controls for personal computers; electronic pointers, namely, light-emitting electronic pointers in the nature of luminous pointers, infrared pointers in the nature of slide presentation infrared pointer pens, and laser pointers, laser sensors for use in measuring motion; motion detectors, computer chips; semiconductors, integrated circuits; operating software for use with computer mice, trackballs, touch pads and computer joysticks, remote controls for personal computers, electronic pointers, namely, light-emitting electronic pointers in the nature of luminous pointers, infrared pointers in the nature of slide presentation infrared pointer pens, and laser pointers, laser sensors for use in measuring motion, motion detectors, computer chips, semiconductors and integrated circuits; alarms, namely, burglar alarms, fire alarms; scales for babies; computer monitors, thermometers not for medical purposes, and electronic thermometers not for medical purposes, including soother thermometers not for medical purposes; anti-radiation garment; downloadable</p>
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	electronic publications, provided online from databases or on the Internet, namely, magazines in the field of child care; blank electronic data storage media; pre-recorded magnetic data storage media, pre-recorded compact discs, pre-recorded cd-roms, pre-recorded records, pre-recorded tapes, pre-recorded discs, pre-recorded cassettes, and pre-recorded cartridges, all in the field of mother and child care, and all containing sound, video, data, images, games, text, programs or information; blank interactive compact discs; blank CD-ROMs; blank record disks; blank video tapes; blank audio tapes; blank discs, namely, blank magnetic disks, blank record discs; blank audio cassettes; blank video cassettes; removable blank cartridges for hard disk drives; computer software programs for use in database management, spreadsheet processing, word processing, and software applications for mobile phones and other handheld mobile digital electronic devices for use in database management, spreadsheet processing, word processing; downloadable mobile applications for managing bank accounts, editing photos, making restaurant reservations, managing calendars; computer programs for accessing, browsing and searching online databases; computer software and firmware, namely, operating system programs, data synchronization programs, and application development computer software programs for personal and handheld computers; spectacle frames, eyeglasses, sunglasses; fridge magnets; baby monitors; digital video monitors; chargers for electric batteries; battery chargers; batteries and electric rechargeable batteries; electrical rechargeable battery packs; central processing units for baby monitors; electric connections for lines to baby monitors; electrical power extension cords; electric charger stands for parent units of baby
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	<p>monitors; parts of baby monitors in this class only; bath and room thermometers not for medical purposes; digital photograph frames; electric stress meters not for medical use; x-ray apparatus not for medical purposes; parts of the aforesaid goods in this class only in class 009.</p> <p>For: Surgical, medical, dental and veterinary instruments and apparatus; clothes for operating rooms, namely, surgical gowns; lights and lamps for medical, curative, surgical, and dental use, namely, surgical headlamps, surgical headlights, surgical lamps, surgical operating lamps; lights and lamps for veterinary use, namely, for surgical examination; artificial limbs, eyes and teeth; electric blankets for medical use; ultraviolet irradiation apparatus, devices and instruments for medical use, namely, ultraviolet lamps for medical purposes, ultraviolet radiator units for therapeutic purposes, UV lamps for medical applications; x-ray apparatus, tubes, installations and instruments for medical use; medical hearing instruments; feeding bottles; teats and soothers, namely, pacifiers for babies; chains and clips for holding pacifiers for babies; teething rings; spoons and medical feeders for administering medicines; incubators for medical purposes; breast pumps; nursing appliances for use in breast feeding, namely, breast shields and nipple protectors; thermometers for medical use; condoms; incubators for babies; commode chairs for babies and children; massage apparatus, electric or non-electric, body and breast massage apparatus; gloves for massage; vibration generating apparatus for massage for medical purposes; pregnancy support belts for medical purposes; babies bottles; disposable feeding bottles; disposable babies bottles; nipple shields for use in breastfeeding and</p>
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	<p>in baby bottles; ice packs for medical purposes; breast milk storage bottles, pouches and other similar containers, that also can be frozen or heated; dummies for babies in the form of nipples; ear and forehead thermometers for medical use; medical apparatus for removing nasal mucous, namely, external nasal dilators, nasal aspirators, nasal irrigation vessels and naval lavage vessels; lasers for medical and cosmetic treatment of the face and the skin; skin rejuvenating apparatus, namely, portable laser systems, consisting of a handheld laser for use in cosmetic, medical and dermatological treatment of the face and the skin; dental instruments and tools for dental bleaching, or whitening, namely, dental curing lights, curing dental bite trays, intra-oral dental lights, and polymerization apparatus for dental purposes; parts of the aforesaid goods in class 010.</p> <p>For: Electric grills, electric toasters, electric bread-making machines, electric stone grills, electric sandwich makers, electric sandwich toasters, electric coffee makers, electric filtered coffee machines, electric kettles, electric food steamers, electric rice cookers, baking ovens, electric cooking ovens and microwave ovens; electric lamps; humidifying and dehumidifying installations, apparatus and instruments; apparatus and instruments for air conditioning; hot water tanks; installations in the nature of heat exchangers for liquefying gases; apparatus and instruments for sterilizing; heaters and warmers for feeding bottles, foodstuffs, liquids and solids; steam generating apparatus to generate steam for ironing purposes, for domestic use; air filters for domestic use, air purifiers and air humidifiers; hot water bottles; electric fryers and electric low-fat fryers; electric hair dryers; garment steamers; refrigeration</p>
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	<p>coolers for breast milk; parts of the aforesaid goods in class 011.</p> <p>For: Precious metals and their alloys; jewelry made of precious metals or coated therewith; statues and statuettes of precious metals or coated therewith; jewelry, including bracelets for babies and young children; precious stones; horological and other Chronometrie instruments; clocks; alarm clocks; watches; sleep trainer clocks, namely, clocks with alarms to awaken individuals to keep to training schedules; rough and processed industrial diamonds; parts of the aforesaid goods in class 014.</p> <p>For: Paper; cardboard; printed matter, namely, newspapers, periodicals, books, catalogues, brochures, all in the field of mother and child care; folders, posters, diaries, newsletters in the field of mother and child care, printed publications, namely, magazines in the field of mother and child care; bookbinding material; photographs; stationery; writing material, namely, writing tablets; pencils; pens; materials for packaging of plastic, paper or cardboard, not included in other classes; adhesives materials for stationery and household purposes; artists' materials, namely, molds for modeling clays; paint brushes; typewriters and office requisites other than furniture, namely, punches; letter openers; printed instructional and teaching material in the field of mother and child care; printers' type; printing blocks; printing plates; disposable paper wipes for use on babies and infants; bibs and disposable bibs made of paper; table napkins of paper; plastic bags for packaging ice bags for microwave cooking; plastic oven cooking bags; handkerchiefs of paper; cellulose wipes; banners of paper; paintings on silk in class 016.</p>
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	<p>For: Leather and imitations of leather; skins and hides; trunks and travelling bags; umbrellas, parasols and walking sticks; whips, harness and saddlery; baby slings and baby harnesses; ruck sacks, knapsacks, hand bags and other bags not included in other classes, namely, all-purpose carrying bags; baby changing bags; diaper bags; parts for all the aforesaid goods in this class only in class 018.</p> <p>For: Furniture, mirrors, picture frames; locks and safety latches, not of metal; corner protectors of plastic for furniture; doorstop protectors, not of metal; safety gates for stairs and door openings; fireguards being furniture; bed rails, high chairs; cots and bassinets for babies and young children; pillows; baby changing mats; baby nest in the nature of padded carriers; support pillows for use in baby car safety seats and baby car safety seats; baby head support cushions; breast feeding pillows; parts for all the aforesaid goods in this class only in class 020.</p> <p>For: Household utensils, namely, sieves, spatulas, strainers, turners, graters, skimmers, kitchen tongs; household containers; kitchen utensils, namely, splatter screens, pouring and straining spouts; kitchen containers; combs; scrub sponges, sponges for household purposes; brushes, namely, brushes for basting meat, cosmetic brushes, cleaning brushes for household use; toothbrushes, finger toothbrushes; household apparatus for cleaning teeth and gums using high pressure water; dental floss; apparatus for cleaning gums and between teeth, namely, electronic flossers which use water and air to clean between teeth; brush-making materials; electrically heated hair brushes; electric hair combs; electric rotating hair brushes for styling hair; beverage glassware; porcelain and earthenware</p>
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	<p>figurines and statuettes, not included in other classes; cups and vessels adapted for feeding babies and children; household pouring spouts for cups, adapted for feeding babies and children; cups for food; containers for use in the sterilization of babies' feeding bottles and closures for such containers; milk powder dispensers; heat insulated containers for household use, including heat insulated containers for baby feeding bottles; baby food containers sold empty; non-spill covers or caps for use with cups; baths and potties for babies; bowls and buckets; drinking vessels; bread boxes, boxes for dispensing paper towels for household use; plastic bag holders for household use; thermal and isothermic household containers to keep bottles and cups warm or cool, including insulated containers; insulated and vacuum flasks and vacuum bottles; parts for the aforesaid goods in this class only in class 021.</p> <p>For: Textile goods, not included in other classes, namely, towels of textile; bed covers; textile table covers not of paper; bed linen, textile goods for furnishing purposes, namely, pillow shams; fabric and cloth linens for pram and cot linen cots; woven synthetic textile wipes not impregnated with toilet preparations or cosmetics for use in sports; cloth napkins and table napkins made of textile; place mats not of paper; dish cloths; corduroy; felt and non-woven fabrics; bed clothes, namely, bed sheets; bed linen; unfitted loose covers for furniture; washing mitts, namely, bath mitts; cloth banners and textile banners in class 024.</p> <p>For: Clothing, namely, shirts, pants, t-shirts; footwear; headgear, namely, caps, headwear; babies' bibs not of paper; scarves in class 025.</p>
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	<p>For: Games and playthings, namely, board games; gymnastic apparatus, and sporting articles, namely, spring boards, sports balls, carriers specially adapted for sport balls, all not included in other classes; decorations for Christmas trees; baby rattles; dolls in class 028.</p> <p>For: Retail store services featuring laundry and cleaning preparations, pharmaceuticals, household appliances, hand-operated tools and implements, household electronic apparatus, surgical, medical, dental and veterinary instruments and apparatus, cooking apparatus, jewelry, publications and paper products, leather and imitation leather products, furniture, household and kitchen utensils, textiles and textile goods, clothing, games and playthings; advertising; business management; business administration; office functions in class 035.</p> <p>For: Insurance brokerage; financial affairs, namely, financial information; monetary affairs, namely, acquisition and transfer of monetary claims; real estate affairs, namely, real estate agencies in class 036.</p> <p>For: Building construction; repair and installation services of medical machines and apparatus and consumer electronics and household apparatus, namely, medical scanners, gamma ray imaging apparatus, respiration monitoring and flow measurement devices, defibrillators, patient monitors, televisions, audio sound systems and radios, computers and multimedia computers, electric razors and hair trimmers, coffee and tea makers, electric grills, electric woks, electric rice cookers, water heaters, water purifying apparatus, electric toothbrushes; installation services of medical apparatus and electrical consumer electronics and household apparatus, namely, medical scanners,</p>
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	<p>gamma ray imaging apparatus, respiration monitoring and flow measurement devices, defibrillators, patient monitors, televisions; technical support services, namely, repairing and upgrading of computer system hardware, computer printers, and computer hardware and software for medical apparatus; providing maintenance and repair services for medical apparatus; providing maintenance and repair services to home owners buying, and dealers selling major appliances and consumer electronics products, namely, televisions, audio sound systems and radios, computers and multimedia computers, electric razors and hair trimmers, coffee and tea makers, electric grills, electric woks, electric rice cookers, water heaters, water purifying apparatus, electric toothbrushes; servicing of medical apparatus and diagnostic equipment in class 037.</p> <p>For: Telecommunications access services in class 038.</p> <p>For: Education, namely, providing tutorial sessions in the field of mother and child care, skin and facial care; providing of training in the field of mother and child care, skin and facial care; entertainment services in the nature of concerts, namely, live music concerts, arranging and conducting of concerts, concert booking; arranging and conducting of workshops in the field of mother and child care, skin and facial care; the aforesaid services also via Internet and mobile networks; organizing community sporting and cultural activities in class 041.</p> <p>For: Design and development of computer hardware and software; providing temporary and non-downloadable mobile software that enables users of computers and mobile devices to share, information and images, to form virtual communities,</p>
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		<p>to engage in social networking and to monitor babies and infants in class 042.</p> <p>For: Medical services; veterinary services; providing breastfeeding information; provision of health and beauty treatments, namely, cosmetic face care services, cosmetic skin care services; teeth whitening services; hygienic and beauty care services for people; nursing home services; providing of respite care services in the nature of home nursing aid services; medical advice relating to the welfare of babies, infants, children and mothers; rental of medical equipment; all of the aforesaid services also delivered through internet and mobile services in class 044.</p> <p>For: Legal services in class 045.</p>
0967409	PHILIPS	For: electric lamps, electric lighting fixtures and accessories for the aforesaid goods-namely, starters, ballasts, transformers, igniters, sockets and starter holders in class 009 and 011.
3627254		For: Electric toothbrushes in class 021.
4590785		<p>For: Dentifrices; toothpaste; cosmetic tooth whitener; bleaching products for tooth whitening, namely, tooth whitening preparations; tooth gel with tooth whitening effect; mouth waters in the nature of mouth washes, and mouth and dental care products, not for medical purposes, namely, tooth cleaning lotions, mouth rinses, dental bleaching gel in class 003.</p> <p>For: Electric and non-electric toothbrushes, including denture brushes, and their structural and replacement parts; replaceable toothbrush heads; apparatus for cleaning teeth and gums, namely, toothbrushes, apparatus for cleaning teeth</p>

		and gums using compressed air and high speed water for home use; tongue cleaning instruments in the nature of brushes and scrapers for personal care in class 021.
4906671		For: Dental apparatus and instruments, namely, instruments used for gum and tooth cleaning, and teeth whitening applications; electrical dental appliances, namely, instruments and fixtures used for gum and tooth cleaning, and tooth whitening applications; tongue scrapers and tongue cleaning implements in class 010.

8. The above United States registrations for the Philips Trademarks are valid, subsisting, in full force and effect, and many of the registrations for the Philips Trademarks are incontestable pursuant to 15 U.S.C. § 1065. The registrations for the Philips Trademarks constitute *prima facie* evidence of their validity and of Plaintiff's exclusive right to use the Philips Trademarks pursuant to 15 U.S.C. § 1057 (b). True and correct copies of the Federal Trademark Registrations for the above Philips Trademarks are attached hereto as **Exhibit 1**.

9. The Philips Trademarks are distinctive when applied to the Philips Products, signifying to the purchaser that the products come from Plaintiff and are manufactured to Plaintiff's quality standards. Whether Plaintiff manufactures the products or contracts with others to do so, Plaintiff has ensured that products bearing the Philips Trademarks are manufactured to the highest quality standards.

10. The Philips Trademarks are famous marks, as that term is used in 15 U.S.C. § 1125(c)(1) and have been continuously used and never abandoned. The widespread fame, outstanding reputation, and significant goodwill associated with Plaintiff's brand has made the Philips Trademarks valuable assets of Plaintiff.

11. Plaintiff has expended substantial time, money, and other resources in developing, advertising, and promoting the Philips Trademarks. Philips maintains high quality standards and enforces strict requirements to ensure the quality of goods, compliance with regulations, and dependable characteristics. In fact, Philips has expended millions of dollars annually in advertising, promoting, and marketing products featuring the Philips Trademarks. Philips Products have also been the subject of extensive unsolicited publicity resulting from their high quality, performance, and innovative design. As a result, products bearing the Philips Trademarks are widely recognized and exclusively associated by consumers, the public, and the trade as being high-quality products sourced from Plaintiff. Philips Products have become among the most popular of their kind in the U.S. and the world. The Philips Trademarks have achieved tremendous fame and recognition which has only added to the distinctiveness of the marks. As such, the goodwill associated with the Philips Trademarks is of incalculable and inestimable value to Plaintiff.

12. For many years, Plaintiff has operated a website at philips.com. Millions visit usa.philips.com, the official United States Philips website, which prominently displays the Philips Trademarks. Sales of Philips Products via the usa.philips.com website are significant. The website features proprietary content, images and designs exclusive to Plaintiff's brand.

The Defendants

13. Defendants are individuals and business entities of unknown makeup who own and/or operate one or more of the e-commerce stores under at least the Seller Aliases identified on Schedule A and/or other seller aliases not yet known to Plaintiff. On information and belief, Defendants reside and/or operate in the People's Republic of China, or redistribute products from

the same or similar sources in those locations. Defendants have the capacity to be sued pursuant to Federal Rule of Civil Procedure 17(b).

14. On information and belief, Defendants, either individually or jointly, operate one or more e-commerce stores under the Seller Aliases listed in Schedule A attached hereto. Tactics used by Defendants to conceal their identities and the full scope of their operation make it virtually impossible for Plaintiff to learn Defendants' true identities and the exact interworking of their counterfeit network. If Defendants provide additional credible information regarding their identities, Plaintiff will take appropriate steps to amend the Complaint.

IV. DEFENDANTS' UNLAWFUL CONDUCT

15. The success of Plaintiff's brand has resulted in significant counterfeiting of the Philips Trademarks. Consequently, Philips has a worldwide anti-counterfeiting program and regularly investigates suspicious e-commerce stores identified in proactive Internet monitoring or reported from its own distribution network. In recent years, Plaintiff has identified numerous fully interactive, e-commerce stores offering Counterfeit Products on online marketplace platforms such as Amazon, eBay, AliExpress, Alibaba, Wish.com, Walmart, Etsy, and DHgate, including the e-commerce stores operating under the Seller Aliases. The Seller Aliases target consumers in this Judicial District and throughout the United States. According to a U.S. Customs and Border Protection (CBP) Report, in 2021, CBP made over 27,000 seizures of goods with intellectual property rights (IPR) violations totaling over \$3.3 billion, an increase of \$2.0 billion from 2020. *Intellectual Property Rights Seizure Statistics, Fiscal Year 2021*, U.S. Customs and Border Protection ([Exhibit 2](#)). Of the 27,000 in total IPR seizures, over 24,000 came through international mail and express courier services (as opposed to containers), 51 percent of which originated from China and Hong Kong. *Id.*

16. Third party service providers like those used by Defendants do not adequately subject new sellers to verification and confirmation of their identities, allowing counterfeiters to “routinely use false or inaccurate names and addresses when registering with these e-commerce platforms.” **Exhibit 3**, Daniel C.K. Chow, *Alibaba, Amazon, and Counterfeiting in the Age of the Internet*, 40 NW. J. INT’L L. & BUS. 157, 186 (2020); *see also*, report on “Combating Trafficking in Counterfeit and Pirated Goods” prepared by the U.S. Department of Homeland Security’s Office of Strategy, Policy, and Plans (Jan. 24, 2020) attached as **Exhibit 4** and finding that on “at least some e-commerce platforms, little identifying information is necessary for a counterfeiter to begin selling” and recommending that “[s]ignificantly enhanced vetting of third-party sellers” is necessary. Counterfeitors hedge against the risk of being caught and having their websites taken down from an e-commerce platform by preemptively establishing multiple virtual store-fronts. **Exhibit 4** at p. 22. Since platforms generally do not require a seller on a third-party marketplace to identify the underlying business entity, counterfeiters can have many different profiles that can appear unrelated even though they are commonly owned and operated. **Exhibit 4** at p. 39. Further, “E-commerce platforms create bureaucratic or technical hurdles in helping brand owners to locate or identify sources of counterfeits and counterfeiters.” **Exhibit 3** at 186-187.

17. Defendants have targeted sales to Illinois residents by setting up and operating e-commerce stores that target United States consumers using one or more Seller Aliases, offer shipping to the United States, including Illinois, accept payment in U.S. dollars and/or funds from U.S. bank accounts and, on information and belief, have sold Counterfeit Products to residents of Illinois.

18. Defendants concurrently employ and benefit from substantially similar advertising and marketing strategies. For example, Defendants facilitate sales by designing the e-commerce

stores operating under the Seller Aliases so that they appear to unknowing consumers to be authorized online retailers, outlet stores, or wholesalers. E-commerce stores operating under the Seller Aliases look sophisticated and accept payment in U.S. dollars and/or funds from U.S. bank accounts via credit cards, Amazon Pay, and/or PayPal. E-commerce stores operating under the Seller Aliases often include content and images that make it very difficult for consumers to distinguish such stores from an authorized retailer. Plaintiff has not licensed or authorized Defendants to use any of the Philips Trademarks, and none of the Defendants are authorized retailers of genuine Philips Products.

19. Many Defendants also deceive unknowing consumers by using the Philips Trademarks without authorization within the content, text, and/or meta tags of their e-commerce stores to attract various search engines crawling the Internet looking for websites relevant to consumer searches for Philips Products. Other e-commerce stores operating under the Seller Aliases omit using Philips Trademarks in the item title to evade enforcement efforts while using strategic item titles and descriptions that will trigger their listings when consumers are searching for Philips Products.

20. E-commerce store operators like Defendants commonly engage in fraudulent conduct when registering the Seller Aliases by providing false, misleading and/or incomplete information to e-commerce platforms to prevent discovery of their true identities and the scope of their e-commerce operation.

21. E-commerce store operators like Defendants regularly register or acquire new seller aliases for the purpose of offering for sale and selling Counterfeit Products. Such seller alias registration patterns are one of many common tactics used by e-commerce store operators like

Defendants to conceal their identities, the full scope and interworking of their counterfeiting operation, and to avoid being shut down.

22. Even though Defendants operate under multiple fictitious aliases, the e-commerce stores operating under the Seller Aliases often share unique identifiers, such as templates with common design elements that intentionally omit any contact information or other information for identifying Defendants or other seller aliases they operate or use. E-commerce stores operating under the Seller Aliases include other notable common features, such as use of the same registration patterns, accepted payment methods, check-out methods, keywords, advertising tactics, similarities in price and quantities, the same incorrect grammar and misspellings, and/or the use of the same text and images. Additionally, Counterfeit Products for sale by the Seller Aliases bear similar irregularities and indicia of being counterfeit to one another, suggesting that the Counterfeit Products were manufactured by and come from a common source and that Defendants are interrelated.

23. E-commerce store operators like Defendants are in constant communication with each other and regularly participate in QQ.com chat rooms and through websites such as sellerdefense.cn, kaidianyo.com and kuajingvs.com regarding tactics for operating multiple accounts, evading detection, pending litigation, and potential new lawsuits.

24. Counterfeitors such as Defendants typically operate under multiple seller aliases and payment accounts so that they can continue operation in spite of Plaintiff's enforcement. E-commerce store operators like Defendants maintain off-shore bank accounts and regularly move funds from their financial accounts to off-shore accounts outside the jurisdiction of this Court to avoid payment of any monetary judgment awarded to Plaintiff. Indeed, analysis of financial account transaction logs from previous similar cases indicates that off-shore counterfeitors

regularly move funds from U.S.-based financial accounts to off-shore accounts outside the jurisdiction of this Court.

25. Defendants are working in active concert to knowingly and willfully manufacture, import, distribute, offer for sale, and sell Counterfeit Products in the same transaction, occurrence, or series of transactions or occurrences. Defendants, without any authorization or license from Plaintiff, have jointly and severally, knowingly and willfully used and continue to use the Philips Trademarks in connection with the advertisement, distribution, offering for sale, and sale of Counterfeit Products into the United States and Illinois over the Internet.

26. Defendants' unauthorized use of Philips Trademarks in connection with the advertising, distribution, offering for sale, and sale of Counterfeit Products, including the sale of Counterfeit Products into the United States, including Illinois, is likely to cause and has caused confusion, mistake, and deception by and among consumers and is irreparably harming Plaintiff.

COUNT I
TRADEMARK INFRINGEMENT AND COUNTERFEITING (15 U.S.C. § 1114)

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

28. This is a trademark infringement action against Defendants based on their unauthorized use in commerce of counterfeit imitations of the federally registered Philips Trademarks in connection with the sale, offering for sale, distribution, and/or advertising of infringing goods. The Philips Trademarks are highly distinctive marks. Consumers have come to expect the highest quality from Philips Products offered, sold, or marketed under the Philips Trademarks.

29. Defendants have sold, offered to sell, marketed, distributed and advertised, and are still selling, offering to sell, marketing, distributing and advertising products using counterfeit reproductions of the Philips Trademarks without Plaintiff's permission.

30. Plaintiff is the owner of the Philips Trademarks. The United States Registrations for the Philips Trademarks (Exhibit 1) are in full force and effect. On information and belief, Defendants have knowledge of Plaintiff's rights in the Philips Trademarks and are willfully infringing and intentionally using counterfeits of the Philips Trademarks. Defendants' willful, intentional, and unauthorized use of the Philips Trademarks is likely to cause and is causing confusion, mistake, and deception as to the origin and quality of the Counterfeit Products among the general public.

31. Defendants' activities constitute willful trademark infringement and counterfeiting under Section 32 of the Lanham Act, 15 U.S.C. § 1114.

32. Plaintiff has no adequate remedy at law, and if Defendants' actions are not enjoined, Plaintiff will continue to suffer irreparable harm to its reputation and the goodwill of the Philips Trademarks.

33. The injuries and damages sustained by Plaintiff have been directly and proximately caused by Defendants' wrongful reproduction, use, advertisement, promotion, offering to sell, and sale of Counterfeit Products.

COUNT II
FALSE DESIGNATION OF ORIGIN (15 U.S.C. § 1125(a))

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

35. Defendants' promotion, marketing, offering for sale, and sale of Counterfeit 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 Defendants' Counterfeit Products by Plaintiff.

36. By using the Philips Trademarks in connection with the sale of Counterfeit Products, Defendants create a false designation of origin and a misleading representation of fact as to the origin and sponsorship of the Counterfeit Products.

37. Defendants' false designation of origin and misrepresentation of fact as to the origin and/or sponsorship of the Counterfeit Products to the general public involves the use of counterfeit marks and is a willful violation of Section 43 of the Lanham Act, 15 U.S.C. § 1125.

38. Plaintiff has no adequate remedy at law and, if Defendants' actions are not enjoined, Plaintiff will continue to suffer irreparable harm to its reputation and the associated goodwill of Plaintiff's brand.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

- 1) That Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with them be temporarily, preliminarily and permanently enjoined and restrained from:
 - a. using the Philips Trademarks 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 Philips Product or is not authorized by Plaintiff to be sold in connection with the Philips Trademarks;
 - b. passing off, inducing, or enabling others to sell or pass off any product as a genuine Philips Product or any other product produced by Plaintiff, that is not Plaintiff's or not produced under the authorization, control, or supervision of Plaintiff and approved by Plaintiff for sale under the Philips Trademarks;
 - c. committing any acts calculated to cause consumers to believe that Defendants' Counterfeit 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 Philips Trademarks 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 Philips Trademarks, or any reproductions, counterfeit copies, or colorable imitations thereof;

- 2) Entry of an Order that, upon Plaintiff's request, those with notice of the injunction, including, without limitation, any online marketplace platforms such as eBay, AliExpress, Alibaba, Amazon, Wish.com, Walmart, Etsy, and DHgate (collectively, the "Third Party Providers") shall disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of counterfeit and infringing goods using the Philips Trademarks;
- 3) That Defendants account for and pay to Plaintiff all profits realized by Defendants by reason of Defendants' unlawful acts herein alleged and that the amount of damages for infringement of the Philips Trademarks be increased by a sum not exceeding three times the amount thereof as provided by 15 U.S.C. § 1117;
- 4) In the alternative, that Plaintiff be awarded statutory damages for willful trademark counterfeiting pursuant to 15 U.S.C. § 1117(c)(2) of \$2,000,000 for each and every use of the Philips Trademarks;
- 5) That Plaintiff be awarded its reasonable attorneys' fees and costs; and
- 6) Award any and all other relief that this Court deems just and proper.

Dated this 20th day of March 2023.

Respectfully submitted,

/s/ Justin R. Gaudio

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