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Attorneys for Plaintiff
WONDERLAND SWITZERLAND AG

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

WONDERLAND SWITZERLAND AG

Plaintiff,

v.

DOREL JUVENILE GROUP, INC.

Defendant.

Case No. 5:20-cv-01130

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL



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1 **COMPLAINT FOR PATENT INFRINGEMENT**

2 Plaintiff Wonderland Switzerland AG (“Wonderland”) files this Complaint and
3 demand for a jury trial seeking relief for patent infringement by Dorel Juvenile Group,
4 Inc. (“Dorel”) of United States Patent Nos. 8,087,725 (“the ’725 patent”), 8,141,951
5 (“the ’951 patent”), and 8,490,757 (“the ’757 patent”). Wonderland states and alleges
6 the following:

7 **NATURE OF ACTION**

8 1. This is an action for patent infringement arising under the patent laws of
9 the United States, 35 U.S.C. § 1 et seq., specifically including 35 U.S.C. § 271.

10 **THE PARTIES**

11 2. Wonderland is a corporation limited by share ownership (AG) duly
12 organized and existing under the laws of Switzerland, having its principal place of
13 business at Beim Bahnhof 5, 6312 Steinhausen, Switzerland.

14 3. Wonderland is the owner of all rights, title, and interest in the ’725, ’951,
15 and ’757 patents and holds the right to sue and recover damages for infringement
16 thereof, including current and past infringement.

17 4. On information and belief, Defendant Dorel Juvenile Group, Inc. is a
18 Massachusetts corporation with headquarters located at 252 State Street, Columbus,
19 Indiana 47201. On information and belief, Defendant Dorel also has regular and
20 established places of business in this judicial district located at 5400 Shea Center
21 Drive, Ontario, California 91761 and 9950 Calabash Avenue, Fontana, California
22 92335.

23 5. Upon information and belief, Dorel is a subsidiary of Dorel USA, Inc.
24 and sells children’s car seats, strollers, high chairs, changing tables, monitors, and
25 toddler beds under various brand names including Cosco Juvenile, Maxi-Cosi, Safety
26 1st, Quinny, Baby Relax, HOPPOP, Tiny Love, and BABY ART.

1 **JURISDICTION AND VENUE**

2 6. This is a civil action for patent infringement under the patent laws of
3 United States, 35 U.S.C. § 271, *et seq.* This Court has subject matter jurisdiction
4 under 28 U.S.C. §§ 1331 and 1338.

5 7. This Court has both general and specific personal jurisdiction over
6 Defendant Dorel because Dorel has regular and established places of business in this
7 state and conducts business in this state. On information and belief, Dorel has also
8 established minimum contacts with the forum state of California, including in at least
9 the following ways: (1) on information and belief, Dorel has regular and established
10 places of business in this judicial district located at 5400 Shea Center Drive, Ontario,
11 California 91761 and 9950 Calabash Avenue, Fontana, California 92335, (2) Dorel
12 owns and/or operates interactive Internet websites, www.doreljuvenile.com and
13 www.maxi-cosi.com that are accessible to residents of California and this judicial
14 district, through which goods, including Dorel’s Maxi-Cosi Magellan® and the Maxi-
15 Cosi Pria™ families of convertible car seats and the Maxi-Cosi Lara Ultra Compact
16 Stroller and the Maxi-Cosi Adorra Modular Strollers, accused of infringement herein,
17 are advertised and sold, and (3) on information and belief, Dorel offers its goods and
18 sells its goods to residents of California and this judicial district, including its Maxi-
19 Cosi Magellan® and Maxi-Cosi Pria™ families of convertible car seats and the Maxi-
20 Cosi Lara Ultra Compact Stroller and the Maxi-Cosi Adorra Modular Strollers,
21 accused of infringement herein, through online retailers such as Amazon.com, Target,
22 Nordstorm, and BuyBuy Baby. Thus, on information and belief, Dorel has
23 purposefully availed itself of the benefits of the state of California, including this
24 judicial district, and the exercise of jurisdiction by this Court is proper.

25 8. Venue is proper in this federal district pursuant to 28 U.S.C. § 1400(b)
26 because Defendant Dorel has regular and established places of business in this judicial
27 district located at 5400 Shea Center Drive, Ontario, California 91761 and 9950
28

1 Calabash Avenue, Fontana, California 92335, and on information and belief, has
2 committed acts of infringement in this judicial district, including the offer for sale and
3 sale of products accused of infringement herein.

4 **FACTUAL BACKGROUND**

5 **Wonderland and Its Innovative Products**

6 9. The Wonderland companies have been leading innovators in the area of
7 juvenile products for more than 30 years. The Wonderland family of companies
8 design, manufacture, and sell an assortment of products for children of all ages to keep
9 children safe, including state-of-the-art child car seats, play yards, strollers, rockers,
10 and high chairs. Wonderland's and its affiliates' innovations have resulted in over 500
11 patents in the United States and over 2,600 patents worldwide.

12 10. Child car seats protect children while traveling. But children quickly
13 outgrow anything parents buy for them, such as child car seats. Buying new car seats
14 can be a significant expense for new families. Appreciating the inconvenience of
15 having to purchase multiple car seats as a child outgrows each previous version,
16 Wonderland invented improved all-in-one child car seats that can be conveniently
17 adjusted to accommodate a growing child at every stage of childhood and converted
18 into a booster seat for older children.

19 11. Wonderland's inventions allow for improved ease of use in adjusting the
20 backrest and head rest of a car set, without complex and cumbersome modifications
21 to the car-seat configuration.

22 12. Child strollers are essential for transporting babies and small children,
23 and require a reliable and easy-to-use braking mechanism to ensure safety. While
24 stroller braking systems traditionally required a user to exert significant force to
25 operate the brake which in turn shortened the lifetime of the components of the
26 braking system, the invention of the '757 patent provides a braking mechanism that is
27 long lasting, highly reliable and easy to use.

28

1 13. Dorel has been aware of certain inventions described and claimed in
2 Wonderland’s patent portfolio since at least the Fall of 2019.

3 14. For example, Wonderland’s counsel sent Dorel’s President and CEO,
4 Paul Powers, correspondence dated October 25, 2019 that identified the ’757 patent.
5 Exhibit G (October 25, 2019 Letter). The letter identified the ’757 patent’s “particular
6 relevance to the breaking mechanisms of strollers that Dorel manufactures and sells
7 in the United States under the Maxi-Cosi brand,” accused in this Complaint. *Id.*

8 15. Moreover, Dorel has been on notice of its infringement of the the ’951
9 and ’725 patents at least since the time it was served with this complaint. On
10 information and belief, since the time of Wonderland’s correspondence and service of
11 this complaint, Dorel has not taken any affirmative steps to avoid infringing the ’725,
12 ’951 or ’757 patents.

13 **Dorel’s Infringing Products**

14 16. Dorel is in the business of manufacturing and selling juvenile products,
15 including child car seats and strollers. On information and belief, for example, Dorel
16 has sold and continues to sell the Maxi-Cosi Magellan® and the Maxi-Cosi Pria™
17 families of convertible car seats, and the Maxi-Cosi Lara Ultra Compact Stroller and
18 the Maxi-Cosi Adorra Modular Strollers online and in retail stores throughout the
19 United States, including in this judicial district.

20 17. The Maxi-Cosi Magellan® and Pria™ convertible car seats and the
21 accused Maxi-Cosi Lara and Adorra strollers compete with child car seats and
22 strollers manufactured by Wonderland and sold by its customers, including well-known
23 brands such as Graco and Nuna.

24 **Wonderland’s Patents**

25 18. On January 3, 2012, United States Patent No. 8,087,725 (“the ’725
26 patent”) entitled “Head Rest and Harness Adjustment For Child Car Seat” was duly
27
28

1 and legally issued by the United States Patent and Trademark Office (“PTO”). A true
2 and correct copy of the ’725 patent is attached hereto as Exhibit A.

3 19. The ’725 patent relates to “a car seat for use in transporting children in
4 an automobile” and to “a shoulder harness and head rest adjustment apparatus in a car
5 seat that can be adjusted without causing a substantial change in the length of the
6 shoulder harness belt.” *See* Exhibit A, 1:15-20. As children grow, the patented car
7 seat has a head rest that can be adjusted to accommodate changes in their size by
8 moving the harness belts vertically corresponding to a vertical movement of the
9 headrest. *See id.*, 2:48-57.

10 20. The ’725 patent was originally assigned to Wonderland Nurserygoods
11 Co., Ltd., via the assignment of its parent U.S. Patent No. 7,862,117 that was recorded
12 with the PTO on December 9, 2007.

13 21. The ’725 patent was assigned from Wonderland Nurserygoods Co., Ltd.
14 to Wonderland Switzerland AG, and that assignment was recorded with the PTO on
15 November 9, 2018.

16 22. The ’725 patent has four independent claims 1, 8, 15, and 21. Claim 1
17 recites:

- 18 1. A car seat for transporting a child in an automobile, comprising:
19 a seat member including a seat back having a front surface and a rear
20 surface, said seat back including a control rack formed with a plurality
21 of generally vertically spaced engagement portions located on said rear
22 surface to define a plurality of selected vertical positions;
23 a head rest movably mounted on said seat back for vertical movement
24 relative thereto;
25 a locking mechanism mounted on said head rest for vertical movement
26 therewith to engage said control rack to secure said head rest into one of
27 the plurality of selected vertical positions, said locking mechanism
28 including a lock bar that can be moved into engagement with a selected
one of said engagement portions to fix said head rest in the corresponding
selected vertical position; and

1 harness belts extending vertically under said head rest from a position at
2 an upper portion of said seat back and passing through at least one
3 opening in said seat back below said head rest for positioning in front of
4 said seat back, said harness belts being connected to said lock bar so that
5 said harness belts will move vertically in response to a corresponding
vertical movement of said head rest.

6 23. On March 27, 2012, United States Patent No. 8,141,951 (“the ’951
7 patent”) entitled “Child Safety Seat” was duly and legally issued by the United States
8 Patent and Trademark Office (“PTO”). A true and correct copy of the ’951 patent is
9 attached hereto as Exhibit B.

10 24. The ’951 patent relates to a child safety seat having an improved
11 mechanism for adjusting the height of the backrest as a child grows. The mechanism
12 of the ’951 patent provides for an improved design that allows a user to easily and
13 conveniently adjust the height of a backrest. *See* Exhibit B, 1:53-65. The design of
14 the ’951 patent’s backrest adjusting mechanism further allows for a lower cost of
15 manufacture. *Id.*

16 25. The ’951 patent was originally assigned to Excellerate Enterprise Co.,
17 Ltd. and that assignment was recorded with the PTO on September 9, 2009.

18 26. The ’951 patent was assigned from Excellerate Enterprise Co., Ltd. to
19 BP Children’s Products HK Co., Ltd., and that assignment was recorded with the PTO
20 on September 18, 2013.

21 27. The ’951 patent was assigned from BP Children’s Products HK Co., Ltd.
22 to Bambino Prezioso Switzerland AG, and that assignment was recorded with the PTO
23 on August 15, 2018.

24 28. The ’951 patent was assigned from Bambino Prezioso Switzerland AG
25 to Wonderland Switzerland AG, and that assignment was recorded with the PTO on
26 April 16, 2020.

1 29. The '951 patent has one independent claim, which recites:

2 1. A child safety seat comprising:

3 a seat body;

4 an engaging board connected to the seat body, a tooth-shaped structure
5 being formed on the engaging board;

6 a backrest movably disposed on the engaging board; and

7 an engaging mechanism disposed between the engaging board and the
8 backrest, the engaging mechanism comprising: an engaging member
9 pivotally connected to the backrest for engaging with the tooth-shaped
10 structure; and a driving device movably connected to the backrest, the
11 driving device comprising: a connecting member pivotally connected to
12 a first end of the engaging member; and a pulling member connected to
13 the connecting member, for driving the first end of the engaging member
14 to rotate relative to the backrest when the driving device moves to a
15 releasing position, so as to disengage a second end of the engaging
16 member from the tooth-shaped structure, and further for driving the first
17 end of the engaging member to rotate relative to the backrest when the
18 driving device moves to a locking position, so as to engage the second
19 end of the engaging member with a positioning groove of the tooth-
20 shaped structure, such that a height of the backrest relative to the
21 engaging board is fixed;

22 wherein the backrest is capable of moving relative to the engaging board
23 when the second end of the engaging member is disengaged from the
24 tooth-shaped structure.

25 30. On July 23, 2013, United States Patent No. 8,490,757 (“the '757 patent”)
26 entitled “Stroller and Brake Mechanism Thereof” was duly and legally issued by the
27 United States Patent and Trademark Office. Wonderland owns the '757 patent by
28 assignment. A true and correct copy of the '757 patent is attached as Exhibit C.

 31. The '757 patent relates to a brake mechanism for a stroller including a
pedal assembly which, when activated by a user, causes a brake member to engage
with recesses formed in the wheels of the stroller to cause braking to occur. *See*

1 Exhibit C, 1:50 – 2:3. The brake mechanism of the '757 patent has advantages of
2 “simple structure, convenient operation, and high reliability.” *Id.*

3 32. The '757 patent was originally assigned to Wonderland Nurserygoods
4 Co., Ltd., and that assignment was recorded with the PTO on July 20, 2011.

5 33. The '757 patent was assigned from Wonderland Nurserygoods Co., Ltd.
6 to Wonderland Switzerland AG, and that assignment was recorded with the PTO on
7 November 1, 2017.

8 34. The '757 patent has two independent claims 1 and 21. Claim 1 recites:

9 1. A brake mechanism for a stroller comprising:

10 an axle;

11 a wheel; and

12 at least one brake fixing seat disposed at an inner side of the wheel, the
13 brake fixing seat comprising a brake assembly and a fixing seat, the brake
14 assembly comprising a pedal assembly and a brake member, the brake
15 member having at least one abutting portion and at least one brake arm,
16 the brake assembly further comprising a pushing member for pushing the
17 abutting portion;

18 wherein a brake hub is disposed at the inner side of the wheel, a plurality
19 of recesses is formed on the brake hub and is arranged compactly, the
20 axle passes through the pedal assembly, the brake member and the fixing
21 seat sequentially, the pedal assembly is used to drive the pushing member
22 to push the abutting portion, such that the brake member moves toward
the brake hub until the brake arm extends into the recesses, so as to brake
the stroller.

23 35. Wonderland has all rights, title, and interest in and to each of the '725
24 patent, '951 patent, and '757 patent (collectively, “the patents-in-suit”), including the
25 right to sue for infringement of each of the patents-in-suit.

1 **COUNT I**

2 **(Infringement of U.S. Patent No. 8,087,725)**

3 36. Wonderland restates and realleges the preceding paragraphs of this
4 Complaint as if fully set forth herein.

5 37. Pursuant to 35 U.S.C. § 271 (a), Dorel has directly infringed, and
6 continues to directly infringe, literally and/or under the doctrine of equivalents, one
7 or more claims of the '725 patent, as stated below, by making, using, selling, offering
8 for sale, and/or importing into the United States child car seats, including the Maxi-
9 Cosi Pria™ family of convertible car seats, that practice at least one claim of the '725
10 patent (“the Dorel '725 Accused Products”).

11 38. As an example, the claim chart attached hereto as Exhibit D describes
12 how exemplary claim 1 of the '725 patent is infringed by the Maxi-Cosi Pria™ Max
13 3-in-1 Convertible Car Seat.

14 39. Dorel also indirectly infringes at least one claim of the '725 patent by
15 actively inducing under 35 U.S.C. § 271(b) third parties to commit direct infringement
16 with the Dorel '725 Accused Products. Dorel has had actual knowledge of the '725
17 patent since at least the service of this complaint. Dorel has knowledge that its
18 activities concerning the Dorel '725 Accused Products infringe at least one claim of
19 the '725 patent. On information and belief, Dorel has encouraged, aided, or otherwise
20 caused, and will continue to encourage, aid, or otherwise cause, third parties to import,
21 sell, offer for sale, and use the Dorel '725 Accused Products (which are acts of direct
22 infringement of the '725 patent) and Dorel has encouraged and will continue to
23 encourage those acts with the specific intent to infringe one or more claims of the '725
24 patent. Further, Dorel provides information and technical support to its customers,
25 including product manuals, brochures, videos, demonstrations, and website materials
26 encouraging its customers to purchase and instructing them to use the Dorel '725
27 Accused Products (which are acts of direct infringement of the '725 patent). *See, e.g.,*

28

1 [youtube.com/watch?v=5NU3nD_4P6g](https://www.youtube.com/watch?v=5NU3nD_4P6g), [youtube.com/watch?v=tvHrnxBX_Hw](https://www.youtube.com/watch?v=tvHrnxBX_Hw),
2 [youtube.com/watch?v=sWAQ9BE96IE](https://www.youtube.com/watch?v=sWAQ9BE96IE), [youtube.com/watch?v=SixjbpFrRYQ](https://www.youtube.com/watch?v=SixjbpFrRYQ), and
3 [youtube.com/channel/UCazQKhTbd41z2cBq2bbsbKA](https://www.youtube.com/channel/UCazQKhTbd41z2cBq2bbsbKA). In addition, despite its
4 knowledge of the '725 patent, and Dorel's knowledge that there is a high probability
5 that the manufacture, importation, sale, offer for sale, and use of the Dorel '725
6 Accused Products constitutes direct infringement of the '725 patent, Dorel took
7 deliberate actions to remain willfully blind to these facts by failing to take steps to
8 modify the Dorel '725 Accused Products, to instruct end users or customers how to
9 use the Dorel '725 Accused Products in a way to avoid infringement, assuming that
10 were even possible, or, on information and belief, to form a reasonable basis to believe
11 that the claims of the '725 patent were invalid.

12 40. Despite Dorel's knowledge of the '725 patent and its knowledge of its
13 infringing activities, Dorel has and is continuing to intentionally infringe one or more
14 claims of the '725 patent by continuing to manufacture, sell, and/or offer for sale the
15 Dorel '725 Accused Products. This intentional infringement without regard for
16 Wonderland's patent rights constitutes egregious conduct sufficient to establish
17 willful infringement under 35 U.S.C. § 284.

18 41. By reason of the ongoing and continuous infringement by Dorel of the
19 '725 patent, Wonderland is entitled to the entry of a permanent injunction, enjoining
20 Dorel from further infringing of Wonderland's patent rights, pursuant to 35 U.S.C. §
21 283.

22 42. Wonderland has suffered, and is continuing to suffer, damages as a result
23 of Dorel's infringement of the '725 patent, and Wonderland is entitled to
24 compensation and other monetary relief to the fullest extent allowed by law, pursuant
25 to 35 U.S.C. §§ 284 and 285.

1 **COUNT II**

2 **(Infringement of U.S. Patent No. 8,141,951)**

3 43. Wonderland restates and realleges the preceding paragraphs of this
4 Complaint as if fully set forth herein.

5 44. Pursuant to 35 U.S.C. § 271 (a), Dorel has directly infringed, and
6 continues to directly infringe, literally and/or under the doctrine of equivalents, one
7 or more claims of the '951 patent, as stated below, by making, using, selling, offering
8 for sale, and/or importing into the United States child car seats, including the Maxi-
9 Cosi Magellan® family of convertible car seats, that practice at least one claim of the
10 '951 patent (“the Dorel '951 Accused Products”).

11 45. As an example, the claim chart attached hereto as Exhibit E describes
12 how exemplary claim 1 of the '951 patent is infringed by the Maxi-Cosi Magellan®
13 Max 5-in-1 Convertible Car Seat.

14 46. Dorel also indirectly infringes at least one claim of the '951 patent by
15 actively inducing under 35 U.S.C. § 271(b) third parties to commit direct infringement
16 with the Dorel '951 Accused Products. Dorel has had actual knowledge of the '951
17 patent since at least the filing of this complaint. Dorel has knowledge that its activities
18 concerning the Dorel '951 Accused Products infringe at least one claim of the '951
19 patent. On information and belief, Dorel has encouraged, aided, or otherwise caused,
20 and will continue to encourage, aid, or otherwise cause, third parties to import, sell,
21 offer for sale, and use the Dorel '951 Accused Products (which are acts of direct
22 infringement of the '951 patent) and Dorel has encouraged and will continue to
23 encourage those acts with the specific intent to infringe one or more claims of the '951
24 patent. Further, Dorel provides information and technical support to its customers,
25 including product manuals, brochures, videos, demonstrations, and website materials
26 encouraging its customers to purchase and instructing them to use the Dorel '951
27 Accused Products (which are acts of direct infringement of the '951 patent). *See, e.g.,*

28

1 [youtube.com/watch?v=NMfDRBAt5io&list=PLSU1JojuDHrLtkUVSowDI7IwMm](https://www.youtube.com/watch?v=NMfDRBAt5io&list=PLSU1JojuDHrLtkUVSowDI7IwMm)
2 [UsOWbiz, youtube.com/channel/UCazQKhTbd41z2cBq2bbsbKA](https://www.youtube.com/channel/UCazQKhTbd41z2cBq2bbsbKA), and
3 [youtube.com/watch?v=0mmn3ISi0LA](https://www.youtube.com/watch?v=0mmn3ISi0LA). In addition, despite its knowledge of the '951
4 patent, and Dorel's knowledge that there is a high probability that the manufacture,
5 importation, sale, offer for sale, and use of the Dorel '951 Accused Products
6 constitutes direct infringement of the '951 patent, Dorel took deliberate actions to
7 remain willfully blind to these facts by failing to take steps to modify the Dorel '951
8 Accused Products, to instruct end users or customers how to use the Dorel '951
9 Accused Products in a way to avoid infringement, assuming that were even possible,
10 or, on information and belief, to form a reasonable basis to believe that the claims of
11 the '951 patent were invalid.

12 47. Despite Dorel's knowledge of the '951 patent and its knowledge of its
13 infringing activities, Dorel has and is continuing to intentionally infringe one or more
14 claims of the '951 patent by continuing to manufacture, sell, and/or offer for sale the
15 Dorel '951 Accused Products. This intentional infringement without regard for
16 Wonderland's patent rights constitutes egregious conduct sufficient to establish
17 willful infringement under 35 U.S.C. § 284.

18 48. By reason of the ongoing and continuous infringement by Dorel of the
19 '951 patent, Wonderland is entitled to the entry of a permanent injunction, enjoining
20 Dorel from further infringing of Wonderland's patent rights, pursuant to 35 U.S.C. §
21 283.

22 49. Wonderland has suffered, and is continuing to suffer, damages as a result
23 of Dorel's infringement of the '951 patent, and Wonderland is entitled to
24 compensation and other monetary relief to the fullest extent allowed by law, pursuant
25 to 35 U.S.C. §§ 284 and 285.

1 **COUNT III**

2 **(Infringement of U.S. Patent No. 8,490,757)**

3 50. Wonderland restates and realleges the preceding paragraphs of this
4 Complaint as if fully set forth herein.

5 51. Pursuant to 35 U.S.C. § 271 (a), Dorel has directly infringed, and
6 continues to directly infringe, literally and/or under the doctrine of equivalents, one
7 or more claims of the '757 patent, as stated below, by making, using, selling, offering
8 for sale, and/or importing into the United States child car seats, including the Maxi-
9 Cosi family of strollers, that practice at least one claim of the '757 patent (“the Dorel
10 '757 Accused Products”).

11 52. As an example, the claim chart attached hereto as Exhibit F describes
12 how exemplary claim 1 of the '757 patent is infringed by the Maxi-Cosi Lara Ultra
13 Compact Stroller.

14 53. Dorel also indirectly infringes at least one claim of the '757 patent by
15 actively inducing under 35 U.S.C. § 271(b) third parties to commit direct infringement
16 with the Dorel '757 Accused Products. Dorel has had actual knowledge of the '757
17 patent since at least October 25, 2019. Dorel has knowledge that its activities
18 concerning the Dorel '757 Accused Products infringe at least one claim of the '757
19 patent. On information and belief, Dorel has encouraged, aided, or otherwise caused,
20 and will continue to encourage, aid, or otherwise cause, third parties to import, sell,
21 offer for sale, and use the Dorel '757 Accused Products (which are acts of direct
22 infringement of the '757 patent) and Dorel has encouraged and will continue to
23 encourage those acts with the specific intent to infringe one or more claims of the '757
24 patent. Further, Dorel provides information and technical support to its customers,
25 including product manuals, brochures, videos, demonstrations, and website materials
26 encouraging its customers to purchase and instructing them to use the Dorel '757
27 Accused Products (which are acts of direct infringement of the '757 patent). *See, e.g.,*

28

1 [youtube.com/watch?v=xSVU_MtJfgg&list=PLSU1JojuDHRJHtQOIkhsv7hV_Ramb](https://www.youtube.com/watch?v=xSVU_MtJfgg&list=PLSU1JojuDHRJHtQOIkhsv7hV_Ramb)
2 [rOaV, youtube.com/channel/UCazQKhTbd41z2cBq2bbsbKA](https://www.youtube.com/channel/UCazQKhTbd41z2cBq2bbsbKA), and [maxicosi.com/us-](https://maxicosi.com/us-en/lara-ultra-compact-stroller-cv364-mc-us-en.html)
3 [en/lara-ultra-compact-stroller-cv364-mc-us-en.html](https://maxicosi.com/us-en/lara-ultra-compact-stroller-cv364-mc-us-en.html). In addition, despite its
4 knowledge of the '757 patent, and Dorel's knowledge that there is a high probability
5 that the manufacture, importation, sale, offer for sale, and use of the Dorel '757
6 Accused Products constitutes direct infringement of the '757 patent, Dorel took
7 deliberate actions to remain willfully blind to these facts by failing to take steps to
8 modify the Dorel '757 Accused Products, to instruct end users or customers how to
9 use the Dorel '757 Accused Products in a way to avoid infringement, assuming that
10 were even possible, or, on information and belief, to form a reasonable basis to believe
11 that the claims of the '757 patent were invalid.

12 54. Despite Dorel's knowledge of the '757 patent and its knowledge of its
13 infringing activities, Dorel has and is continuing to intentionally infringe one or more
14 claims of the '757 patent by continuing to manufacture, sell, and/or offer for sale the
15 Dorel '757 Accused Products. This intentional infringement without regard for
16 Wonderland's patent rights constitutes egregious conduct sufficient to establish
17 willful infringement under 35 U.S.C. § 284.

18 55. By reason of the ongoing and continuous infringement by Dorel of the
19 '757 patent, Wonderland is entitled to the entry of a permanent injunction, enjoining
20 Dorel from further infringing of Wonderland's patent rights, pursuant to 35 U.S.C. §
21 283.

22 56. Wonderland has suffered, and is continuing to suffer, damages as a result
23 of Dorel's infringement of the '757 patent, and Wonderland is entitled to
24 compensation and other monetary relief to the fullest extent allowed by law, pursuant
25 to 35 U.S.C. §§ 284 and 285.

PRAYER FOR RELIEF

WHEREFORE, Wonderland respectfully requests that this Court:

- a) Enter judgment that Dorel has infringed one or more claims of the '725, '951 and '757 patents;
- b) Enter an order permanently enjoining Dorel and its officers, agents, employees, attorneys, and all persons in active concert or participation with any of the foregoing, from infringing claims of the '725, '951 and '757 patents;
- c) Award Wonderland damages in an amount sufficient to compensate for Dorel's infringement of one or more claims of the '725, '951 and '757 patents, together with pre-judgment and post-judgment interest costs, and all other damages permitted under 35 U.S.C. § 284;
- d) Perform an accounting of Dorel's infringing activities through trial and judgment;
- e) Treble damages awarded to Wonderland under 35 U.S.C. § 284 by reason of Dorel's willful infringement of the '725, '951 and '757 patents;
- f) Declare this case to be "exceptional" under 35 U.S.C. § 285 and award Wonderland its attorneys' fees, expenses, and costs incurred in this action; and
- g) Award Wonderland such other and further relief as this Court deems just and proper.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Wonderland demands a trial by jury on all issues on which trial by jury is available under applicable law.

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Dated: June 2, 2020

FISH & RICHARDSON P.C.

By: /s/ Christopher S. Marchese

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