



INTELLECTUAL PROPERTY MATTERS

LITIGATION – SETTLEMENTS

STATE OF MARYLAND (CT. OF APPEALS)  
DISTRICT COURT FOR THE DISTRICT OF COLUMBIA (DDC)  
NORTH. DIST. OF ILLINOIS (NDIL)  
SEVENTH CIRCUIT COURT OF APPEALS (7TH CIR.)  
NINTH CIRCUIT COURT OF APPEALS (9TH CIR.)

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June 22, 2026

VIA ELECTRONIC FILING

The Honorable Lisa R. Barton  
Secretary to the Commission  
U.S. INTERNATIONAL TRADE COMMISSION  
500 E Street, SW, Room 112-A  
Washington, DC 20436

Re: Certain Vehicle Space Guards; Inv. No. 337-TA-

Dear Secretary Barton:

Pursuant to 19 C.F.R. §§ 210.8 and 210.12, and Commission Rule 210.14(b), enclosed please find the following documents constituting the Amended Section 337 Complaint filed on behalf of Complainant Jonathan Black Kotyk against the Proposed Respondents identified below. This Amended Complaint supersedes the original Complaint in its entirety.

The Amended Complaint is filed for the purposes of:

- withdrawing Complainant's prior request for a General Exclusion Order ("GEO").

Complainant now seeks only a limited exclusion order ("LEO") directed at the specific Proposed Respondents identified herein, together with permanent cease and desist orders and a bond during the Presidential review period;

- emphasizing that U.S. Patent No. 7,527,314 ("the '314 Patent"), titled "Vehicle Gap

Guard," claims and discloses a vehicle space guard that includes attachment means, such as specifically, Velcro or adhesive;

- modifying the Asserted Claims of the '314 Patent as set forth below:

Independent Claims: 1, 14

Dependent Claims: 2–4, 6, 8–12, 15–16, 18, 19

Drop Stop, LLC is further alleged to have directly and literally infringed one or more claims of the '314 Patent;

- adding factual and legal support for the existence of an implied license to One More Thing, LLC with respect to the '314 Patent. The implied license arose in two successive stages, from D. Pelfrey in 2013 to 2023, and from J. Kotyk from 2023 to present-day; and
- updating and substantially expanding the domestic industry section to provide detailed factual support under each applicable subsection of 19 U.S.C. § 1337(a)(3).

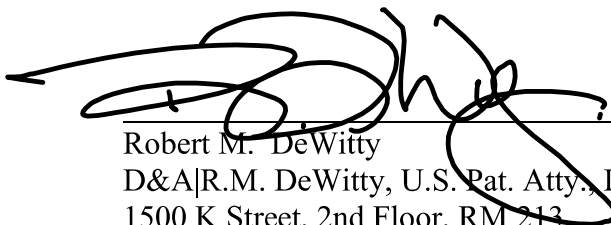
Enclosed herewith please find the following documents:

1. One (1) electronic copy of the verified Non-Confidential Amended Complaint (19 C.F.R. §§ 210.8(a)(1)(i);
2. One (1) electronic copy of the Confidential Amended Complaint (19 C.F.R. §§ 210.8(a)(1)(a);
3. One (1) electronic copy of Complainant's letter requesting confidential treatment for the information contained in new Confidential Exhibit Nos. 32-C through 52 (19 C.F.R. §§ 210.5(d) and 201.6(b));

4. One (1) electronic copy of the accompanying new Non-Confidential Exhibit 17 and public versions of the new Confidential Exhibits, including new Exhibit Nos. 32-C through 52 (19 C.F.R. § 210.8(a)(1)(i)); and
5. One (1) electronic copy of the new Confidential Exhibit Nos. 32-C through 52 (19 C.F.R. §§ 210.8(a)(1)(ii) and 201.6(c)).

Passage to investigation is hereby requested. Please contact me with any questions regarding this submission.

Respectfully,



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