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CLIENT/MATTER NUMBER
105912-0116

June 30, 2026

Via EDIS

The Honorable Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street, S.W., Room 112
Washington, DC 20436

Re: *Certain Convertible Child Highchairs*, ITC Inv. No. 337-3913

Dear Secretary Barton:

On behalf of Complainant Kids2, LLC ("Kids2"), and pursuant to discussions with the Office of Unfair Import Investigations ("OUII"), we write to address certain revisions to the Public Interest Statement and the Complaint and to provide an update on the status of Kids2's request to the United States Patent and Trademark Office ("USPTO") for certified copies of the Asserted Patents, prosecution histories, and assignment records.

1. Public Interest Statement

The signature block of the Public Interest Statement should be revised to make three corrections. First, the following email addresses should be added: "drwright@foley.com" for David R. Wright, "jbraithwaite@foley.com" for Jared J. Braithwaite, and "broush@foley.com" for Bradley Roush. Second, the telephone number listed below Bradley Roush should be corrected from "(202) 672-5399" to "(202) 672-5300." Third, the entity name should be corrected from "Kids2, Inc." to "Kids2, LLC." Accordingly, the signature block of the Public Interest Statement should be revised to read:

"David R. Wright
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Counsel for Complainant Kids2, LLC”

2. Cover Page and Signature Block of the Complaint

The “Counsel for Complainant” section on the cover page of the Complaint and the signature block of the Complaint (page 34) should be revised in the same manner as the signature block of the Public Interest Statement. First, the following email addresses should be added: drwright@foley.com for David R. Wright, jbraithwaite@foley.com for Jared J. Braithwaite, and broush@foley.com for Bradley Roush. Second, the telephone number listed below Bradley Roush should be corrected from “(202) 672-5399” to “(202) 672-5300.” Third, the entity name should be corrected from “Kids2, Inc.” to “Kids2, LLC.” Accordingly, the “Counsel for Complainant” section and the signature block should be revised to read, respectively:

“Counsel for Complainant:

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Counsel for Complainant Kids2, LLC”

3. Paragraph 5.21 of the Complaint (Page 15)

The exhibit numbers in Paragraph 5.21 should be corrected to reflect the correct exhibit numbers for the assignment records of the Asserted Patents. Specifically, Paragraph 5.21 should be revised to read:

“Kids2 owns by valid assignment the entire right, title, and interest in and to each of the Asserted Patents. Copies of the assignments for each of these patents are attached hereto as **Exhibits 19–23.**”

4. Paragraph 6.14 of the Complaint (Pages 19–20)

The table of Accused Graco Products in Paragraph 6.14 incorrectly lists claim 21 of the ’053 Patent as an asserted claim. Paragraph 6.14 should be revised to read:

“The Accused Graco Products include the following:¹³

Model	Asserted Claims
DuoDiner DLX 6-in-1 Highchair	’225 Patent claims 6–7, and 9–14 ’749 Patent claims 3–8 ’513 Patent claims 3–9, 10, 11–17, 18, and 19–25 ’053 Patent claims 3, 6–7, 9–13, 17–20, 22–23, 24, and 25–34 ’006 Patent claims 3–4, 6–7, 10–11, 13–14, 18–20, 21, and 22–23
Table2Table LX 6-in-1 Highchair	’225 Patent claims 6–7, and 9–14 ’749 Patent claims 3–8 ’513 Patent claims 3–9, 10, 11–17, 18, and 19–21, and 24–25 ’053 Patent claims 3, 6–7, 9–13, 17–20, 22–23, 24, and 25–34 ’006 Patent claims 6–7, 13–14, 18, and 21

Table2Table Premier Fold 7-in-1 High Chair	'225 Patent claims 6–7, and 9–14
	'749 Patent claims 3–8
	'513 Patent claims 3–9, 10, 11–17, 18, and 19–21, and 24–25
	'053 Patent claims 3, 6–7, 9–13, 17–20, 22–23, 24, and 25–34
	'006 Patent claims 6–7, 13–14, 18, and 21”

5. Paragraph 9.7 of the Complaint (Page 29)

Paragraph 9.7 should be revised to add the following statement: “There are no material differences between the products charted in Exhibit 66 and the other Domestic Industry Products.” Specifically, Paragraph 9.7 should be revised to read:

“Exemplary claim charts that are representative of how the Domestic Industry Products directly practice at least one independent claim of each of the Asserted Patents are attached hereto as **Exhibit 66**. There are no material differences between the products charted in Exhibit 66 and the other Domestic Industry Products.”

6. Paragraph 11.3 of the Complaint (Page 32)

Paragraph 11.3 should be revised to correct the dismissal date of the *Kids2, LLC v. Dorel Juvenile Group, Inc.* litigation from June 4, 2024 to June 4, 2025, and to clarify that the parties did not engage in substantive motion practice and the court did not issue any substantive orders. Specifically, Paragraph 11.3 should be revised to read:

“On September 19, 2024, Kids2 filed a complaint against Dorel Juvenile Group, Inc. in the United States District Court for the District of Massachusetts alleging infringement of the U.S. Patent No. 9,101,225; U.S. Patent No. 9,883,749; U.S. Patent No. 10,278,513; U.S. Patent No. 10,835,053; U.S. Patent No. 11,534,006 and U.S. Patent No. 11,653,771. *See Kids2, LLC v. Dorel Juvenile Group, Inc.*, Case No. 1:24-cv-12399. The case was dismissed on June 4, 2025, without the parties engaging in any substantive motion practice or the court issuing any substantive orders.”

7. Certified USPTO Records

As stated in the Complaint, on April 15, 2026, Kids2 requested certified copies of the Asserted Patents, prosecution histories for the Asserted Patents, and assignment records for the Asserted Patents. Due to a significant backlog in fulfilling requests for such records at the USPTO, Kids2 has not yet received these records. Kids2 contacted the USPTO regarding the status of its request and was advised today that the records are in the final stages of processing and will be sent out as soon as they are ready. Kids2 will supplement the Complaint with these Exhibits upon receipt.



FOLEY & LARDNER LLP

June 30, 2026

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Please do not hesitate to contact me with any questions about this letter. Thank you for your attention to this matter.

Sincerely,

/s/ Bradley Roush

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