

HUSCH BLACKWELL

Beau Jackson

Partner

4801 Main Street, Suite 1000
Kansas City, MO 64112
Direct: 816.983.8202
Fax: 816.983.8080
beau.jackson@huschblackwell.com

1801 Pennsylvania Avenue NW, Suite 1000
Washington, DC 20006
Phone: 202.378.2406
Fax: 202.378.2319

July 7, 2026

VIA ELECTRONIC FILING

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

Re: *Supplement to Section 337 Complaint by The Ergo Baby Carrier, Inc.: Certain Adjustable Child Carriers and Components Thereof, Docket No. 337-3917*

Dear Secretary Barton:

On June 25, 2026, counsel for The Ergobaby Carrier, Inc. (“Ergobaby” or “Complainant”) met telephonically with the Office of Unfair Import Investigations (“OUII”), in which Ergobaby was requested to provide certain supplements and clarifications to its Section 337 Complaint originally filed June 18, 2026.

Pursuant to OUII’s comments and to ensure the timely institution of the requested investigation, Ergobaby respectfully submits the following modifications and additions to its Complaint and Exhibits thereto.¹

- **Cover page/caption:**
 - **Complainant address block:** “The ErgoBaby Carrier, Inc.” — lowercase “b” deleted and replaced with uppercase “B” (i.e., “Ergobaby” → “Ergo Baby” corrected capitalization).
 - **Counsel for Complainant (Lathrop GPM):** Four email addresses added:
 - Travis.McCallon@lathropgpm.com
 - Luke.Meriwether@lathropgpm.com

¹ We understand it is not necessary to file a redlined version of the Complaint. However, we would be happy to do so upon request.

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- Eric.Sidler@lathropgpm.com
- Timothy.Hadachek@lathropgpm.com
- **Proposed Respondent — Mabe, LLC address:** “P.O. Box 222” deleted and replaced with “1463 N. 825 E”; zip code updated from “83274” to “83274-5055.”²
- **Proposed Respondent — Quanzhou Baby Nice address:** “Building 2, Tanghou Market” deleted and replaced with “Cultural Activity Room, Xuhui City Property,”; street number changed from “999” to “777”; city changed from “Shishi” to “Quanzhou”; postal code “362714” added.
- **Proposed Respondent — Xiamen Funwhale Technology LLC address:** “Jime 1 District” corrected to “Jimei District”; “Xiamen” updated to “Xiamen City”; postal code “361000” added.
- **Proposed Respondent — Xiamen New Baby Products Co., Ltd. address:** Postal code “361000” added after “China.”
- **Proposed Respondent — Portier USA, LLC address:** “2355 Westwood Boulevard #1889” and “Los Angeles, CA 90064” deleted; replaced with “30 N. Gould Street, Suite N” and “Sheridan, WY 82801.”
- **Proposed Respondent — Ava & Oliver:** “Ava & Oliver” changed to “Ava + Oliver, LLC.”
- **Proposed Respondent — Bugaboo International B.V. address:** “The Netherlands” added after “Zuidoost.”
- **Para 2:** “Ava & Oliver” changed to “Ava + Oliver, LLC”
- **Para. 8:** New last sentence added: “Products within the Omni Family are similar from a technical and functionality standpoint. Principal differences between the products are limited to fabric and cosmetic options as well as branding/marketing approaches.”
- **Para 9, Chart, GROUP 2:** “Ava & Oliver” changed to “Ava + Oliver, LLC (“Ava & Oliver”); closing parenthesis added after “Koi Trading.”
- **Section II.A heading:** (“Ergobaby”) added after “The Ergo Baby Carrier, Inc.”
- **Para. 16:** Replaced “The Ergo Baby Carrier, Inc. (‘Ergobaby’)” with “Ergobaby” (defined term relocated to the section heading above)

² Ergobaby also addressed this issue in a previous supplementation filed on June 23, 2026. *See* EDIS Doc ID 885987.

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- **Para. 27:** Address for Proposed Respondent Quanzhou Baby Nice Infant and Child Products Co., Ltd. edited to match changes made on the cover sheet (*see supra*).
- **Para. 28:** Address for Proposed Respondent Xiamen Funwhale Technology LLC edited to match changes made on the cover sheet (*see supra*).
- **Para. 31:** Address for Proposed Respondent Xiamen New Baby Products Co., Ltd. edited to match changes made on the cover sheet (*see supra*).
- **Para. 45:** “Wyoming” inserted before “company”; principal place of business updated to “30 N. Gould Street, Suite N, Sheridan, Wyoming 82801, and with additional address listed at 1 N. Broadway, Suite 1020, White Plains, New York 10601,” before the existing “2355 Westwood Boulevard #1889” address; phrase “with a secondary address listed at” deleted.
- **Para. 49:** New sentence inserted at end: “Also included in Exhibit 27 are true and accurate screenshots taken from the website of the Wyoming Secretary of State showing Portier is a Wyoming Limited Liability Company with its principal place of business located at 30 N. Gould Street, Suite N, Sheridan, Wyoming 82801.”
- **Section III.G heading:** “Ava & Oliver” changed to “Ava + Oliver, LLC.”
- **Para. 52:** “Ava & Oliver” changed to “Ava + Oliver, LLC (“Ava & Oliver”)”; “Hawaiian” inserted before “company”; principal place of business updated to “3514B Waialae Avenue, Honolulu, Hawaii 96816, and with additional addresses listed at” before the existing “2855 E. Manoa Road” address; phrase “with a secondary address listed at” deleted.
- **Para. 56:** “Ava & Oliver’s location” replaced with “Ava & Oliver is a Hawaiian Limited Liability Company and its location . . .”
- **Para. 63:** New sentences inserted at end: “Also included in Exhibit 37 are true and accurate screenshots (i) from the Terms and Conditions page of Artipoppe’s website stating that the ‘Identity of the company’ is Proposed Respondent Bugaboo North America, Inc., and (ii) from the About / Craftsmanship page of Artipoppe’s website describing that the design process for the Accused Artipoppe Carriers ‘begins in the Netherlands,’ the assembly is ‘completed in Xiamen, China’ at the ‘facility of Artipoppe’s mother company, Bugaboo,’ and then rigorous quality control is done ‘one more time at the Artipoppe headquarters in the Netherlands.’”
- **Para. 64:** Address for Proposed Respondent Bugaboo International B.V. edited to match changes made on the cover sheet (*see supra*). Description of child companies of Bugaboo INTL expanded from “Artipoppe” to “Respondents Bugaboo Xiamen Industrial Co. Ltd., Bugaboo North America, Inc. and/or Artipoppe.”

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- **Para. 68:** “California” inserted before “company.”
- **Para. 69:** New sentence and footnote 3 added. The sentence added to the end reads: “Also included in Exhibit 40 are true and accurate screenshots taken from the website of the California Secretary of State showing Bugaboo NA is a California corporation with its principal place of business located at 37 W. 26th Street, 6th Floor, New York, NY 10010.”

New footnote 3 reads: “Ergobaby acknowledges that some of the enclosed importation data for the Bugaboo entities appears to identify baby “carriages” instead of baby “carriers.” For multiple reasons, however, Ergobaby submits that such records reflect a clerical mistake by Datamyne and that the evidence is clear that these entities are indeed involved in the importation, sale for importation, and/or sale after importation of Artipoppe and/or Zeitgeist baby carriers properly within the scope of this Complaint and the requested investigation. First, as noted above, there is a direct, proven corporate relationship between Artipoppe and the Bugaboo entities. Second, the Artipoppe carrier photographed in Exhibit 34 shows that it was manufactured in China. Third, the importation data included within Exhibits 38-40 shows the named Bugaboo entities shipping to and/or importing into the United States products classified in HTSUS code 6307.90, the code applicable to baby carriers. With respect to that point, Exhibit 41, attached hereto, contains rulings from U.S. Customs and Border Protection confirming that HTSUS subheading 6307.90 is the proper code for cloth/fabric baby carriers imported into the United States. Further, attached as Exhibit 42 are copies of rulings from CBP confirming that baby carriages and strollers are classified in HTSUS subheading 8715, *not* in subheading 6307, which is a textile-specific code. Thus, the Datamyne records for the Bugaboo entities showing the importation of products under subheading 6307.90 clearly indicate the importation of baby *carriers*. In sum, there is abundant evidence confirming that the Bugaboo entities are proper respondents in the requested investigation, as they are corporate parents/affiliates of Artipoppe and are each involved in the importation, sale for importation, and/or sale after importation of baby carriers, including those sold under the Artipoppe and/or Zeitgeist brands.”

- **Para. 83:** New sentence inserted after second sentence: “The ’275 Patent recites adjustments to the depth and width of the carrier, while the ’470 Patent recites adjustments to the length of the carrier, among other things.”
- **Para. 92:** “all” deleted before “adjustable child carriers”; new sentence inserted at end: “Exemplary components include neck supports (recited in the ’470 Patent) and replacement parts designed to attach to or integrate with child carriers.”
- **Para. 95:** The referenced Exhibit I corrected to be Exhibit 6I.
- **Para. 97:** The referenced Exhibit J corrected to Exhibit 6J.

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- **Para. 116:** New sentences inserted at the beginning: “These charts utilize Ergobaby’s Omni Classic baby carrier product as representative of the products in the Omni Family that embody the claims of the Asserted Patents. As stated above, products within the Omni Family are similar from a technical and functionality standpoint, with no differences impacting their embodiment of the claims of the Asserted Patents.”
- **Para. 119:** New sentence inserted at end: “Ergobaby’s domestic investment in plant and equipment pertaining to the Omni Family carriers is significant.”
- **Para. 121:** New sentence inserted at end: “Ergobaby’s domestic employment of labor and capital pertaining to the Omni Family carriers is significant.”
- **Para. 123:** New sentence inserted at end: “Ergobaby’s domestic investments in engineering, research, and development pertaining to the Omni Family carriers are substantial.”
- **Confidential Ex. 4:** A new paragraph 19 has been added, addressing Ergobaby’s U.S. facilities.
- **Ex. 27:** The Articles of Organization for Portier USA LLC have been added at the end of Ex. 27, starting at PDF page 6.
- **Ex. 37:** Screenshots of the General Terms & Conditions of Bugaboo North America, Inc. from the Artipoppe website have been added to the end of Ex. 37, starting at PDF page 6.
- **Ex. 40:** Screenshots from the California Secretary of State website relating to Bugaboo North America, Inc. have been added to the end of Ex. 40, starting at PDF page 88.
- **Ex. 41:** New exhibit containing CBP rulings on the classification of imported baby carriers.
- **Ex. 42:** New exhibit containing CBP rulings on the classification of imported baby carriages/strollers.

We hope these supplements and clarifications adequately address the comments of OUII. Please do not hesitate to contact me with any questions regarding this submission. Thank you very much for your attention to this matter.

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Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Beau Jackson", with a stylized, flowing script.

Beau Jackson

*Counsel for Complainant
The Ergo Baby Carrier, Inc.*

Enclosures.