

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

August 19, 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: *Section 337 Complaint by Willow Innovations, Inc. and Willow Blossom HoldCo Ltd.: Certain Wearable Breast Pumps, Associated Milk Storage Containers, and Components Thereof, Inv. No. 337-TA-_____*

Dear Secretary Barton:

In accordance with the Commission's Temporary Change to Filing Procedures (85 Fed. Reg. 15798 (March 19, 2020)), enclosed for filing on behalf of Complainants Willow Innovations, Inc. ("Willow Innovations") and Willow Blossom HoldCo Ltd. ("Willow Blossom") (collectively, "Willow" or "Complainants") are the following documents in support of Willow's request that the Commission commence an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337:

1. One electronic copy of the verified Non-Confidential Complaint and the Public Interest Statement (19 C.F.R. §§ 210.8(a)(1)(i) and 210.8(b));
2. One electronic copy of Willow's letter and certification requesting confidential treatment for the information contained in Confidential Exhibits 3 and 6 (19 C.F.R. §§ 210.5(d) and 201.6(b));
3. One electronic copy of the accompanying Non-Confidential Exhibits and public versions of the Confidential Exhibits (19 C.F.R. § 210.8(a)(1)(i));

HUSCH BLACKWELL

4. One electronic copy of the aforementioned Confidential Exhibits 3 and 6 (19 C.F.R. §§ 210.8(a)(1)(ii) and 201.6(c));
5. One electronic copy of the non-certified¹ version of the prosecution history for asserted U.S. Patent No. 11,660,380, included as Appendix A to the Complaint. (19 C.F.R. §§ 210.12(c)(1));
6. One electronic copy of the non-certified version of the prosecution history for asserted U.S. Patent No. 12,370,292, included as Appendix B to the Complaint. (19 C.F.R. §§ 210.12(c)(1)); and
7. One electronic copy of the non-certified version of the prosecution history for asserted U.S. Patent No. D1,053,344, included as Appendix C to the Complaint. (19 C.F.R. §§ 210.12(c)(1)); and
8. One electronic copy of the non-certified version of the prosecution history for asserted U.S. Patent No. 11,813,388, included as Appendix D to the Complaint. (19 C.F.R. §§ 210.12(c)(1)); and
9. One electronic copy of the non-certified version of the prosecution history for asserted U.S. Patent No. D1,031,993, included as Appendix E to the Complaint. (19 C.F.R. §§ 210.12(c)(1)); and
10. Electronic copies of the non-certified versions of the prosecution histories of the priority applications related to the patents-in-suit, included as Appendices F to the Complaint (19 C.F.R. §§ 210.12(c)(2)).

Please contact me with any questions regarding this submission. Thank you very much for your attention to this matter.

Respectfully submitted,



Beau Jackson

*Counsel for Complainants
Willow Innovations, Inc. and
Willow Blossom HoldCo Ltd.*

Enclosures

¹ The certified materials for the asserted patents were ordered from the U.S. Patent and Trademark Office in March and June 2026, but have not yet arrived. As such, and per guidance from the Office of Unfair Import Investigations, we are filing this Complaint with the non-certified materials and will immediately supplement to provide the certified materials once received from the PTO.

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

August 19, 2026

VIA ELECTRONIC FILING

REQUEST FOR CONFIDENTIAL TREATMENT

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

Re: *Section 337 Complaint by Willow Innovations, Inc. and Willow Blossom HoldCo Ltd.: Certain Wearable Breast Pumps, Associated Milk Storage Containers, and Components Thereof, Inv. No. 337-TA-_____*

Dear Secretary Barton:

Pursuant to 19 C.F.R. §§ 201.6(b)(1) and 210.5(d), Complainants Willow Innovations, Inc. (“Willow Innovations”) and Willow Blossom HoldCo Ltd. (“Willow Blossom”) (collectively, “Willow” or “Complainants”) respectfully request confidential treatment of the business information contained in Confidential Exhibits 3 and 6 to Willow’s Verified Complaint.

The information contained in these exhibits qualifies as confidential business information pursuant to Commission Rule 201.6 because:

- It is not available to the general public;
- The disclosure of such information would cause substantial harm to Willow, and to the competitive position of Willow and potentially others; and
- Unauthorized disclosure of the information could impair the Commission’s ability to obtain information necessary to perform its statutory function.

HUSCH BLACKWELL

I certify that the proprietary commercial information, proprietary commercial relationships, and/or proprietary business information contained in Confidential Exhibits 3 and 6 is not reasonably available to the public and thus warrants confidential treatment.

Please contact me with any questions regarding this submission. Thank you very much for your attention to this matter.

Respectfully submitted,

A handwritten signature in purple ink, appearing to read 'Beau Jackson', with a stylized flourish extending to the right.

Beau Jackson

*Counsel for Complainants
Willow Innovations, Inc. and
Willow Blossom HoldCo Ltd.*

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.**

In the Matter of

**CERTAIN WEARABLE BREAST PUMPS,
ASSOCIATED MILK STORAGE
CONTAINERS, AND COMPONENTS
THEREOF**

Investigation No. 337-TA-_____

COMPLAINANTS' STATEMENT ON THE PUBLIC INTEREST

Pursuant to 19 C.F.R. § 210.8(b) and in support of its concurrently filed complaint, Complainants Willow Innovations, Inc. ("Willow Innovations") and Willow Blossom HoldCo Ltd. ("Willow Blossom") (collectively, "Willow" or "Complainants") submit this statement on the public interest. This proceeding involves the importation, sale for importation, and sale after importation of certain wearable breast pumps, associated milk storage containers, and components thereof ("Accused Products") that infringe U.S. Patent Nos. 11,660,380; 12,370,292; D1,053,344; 11,813,388; and D1,031,993 (collectively, the "Asserted Patents"). Such unlawful conduct is being carried out by the Proposed Respondents, and possibly others, to the severe commercial detriment of Willow.

The public interest will be *advanced* by the issuance of Willow's requested remedies. As the Commission has repeatedly recognized, there is a strong public interest in protecting U.S. intellectual property rights. *See, e.g., Certain Baseband Processor Chips and Chipsets*, Inv. No. 337-TA-543, Comm'n Op. at 136-137 (June 19, 2007). Moreover, this case epitomizes what Congress envisioned in enacting Section 337, where: (a) there is a bona fide American company developing innovative, proprietary articles in the United States; (b) said American company has been severely impacted in the marketplace by the proliferation of copycat infringing products developed overseas; (c) it would be difficult to remedy the unfair acts in a district court due to, *inter alia*, jurisdictional issues and challenges with foreign discovery; and (d) supply chains are ambiguous and amorphous, and the

complainant thus requires a trade-based, border-enforcement remedy to prevent the continued U.S. importation and sale of infringing products by a multitude of domestic and foreign entities.

I. INTRODUCTION

Willow is a genuine American innovator and a significant U.S. employer. Founded in the Bay Area in 2014, Willow has distinguished itself as the category-defining leader in the maternal health and technology (or FemTech) space. In 2017, after years of time, resources, and money invested in research and development, Willow released the industry's first all-in-one, fully wearable, in-bra breast pump product. This reimagining of the traditional breast pump as a discreetly in-bra wearable, mobile, and digitally connected device was a pioneering advance made possible by Willow's U.S. investments. Willow has continued to expand its U.S.-based business by, *inter alia*, acquiring United Kingdom-based Chiaro Technology Limited and its Elvie brand, and working to bring Elvie-related activities and development efforts to the United States. This united two of the most influential brands in maternal and women's health to create a scaled, U.S.-led FemTech platform with a U.S. focus but a global reach.

By contrast, the Accused Products were, on information and belief, all developed overseas. Moreover, with a few possible exceptions, the Respondents are foreign-controlled companies lacking any meaningful presence in the United States.

Like many pioneering companies, Willow faces unlawful competition in the marketplace from actors who, rather than create their own innovative products, piggyback off the creations of companies like Willow. The Accused Products are all manufactured in China, and, on information and belief, no meaningful or independent development work occurred in the United States with respect to such products. The importation and sale of these infringing products undermines the significant and substantial U.S. investments by Willow, over the course of many years, to develop its market-leading products utilizing the patented technology.

Complainant Willow Innovations owns all right and title to the ‘380 Patent, the ‘292 Patent, and the ‘D344 Patent asserted in this case, which are embodied by at least the following commercialized products sold by Willow: Willow Go® wearable breast pump, Willow 360® wearable breast pump, and Willow Go® Splashguard Container Set replacement parts. Complainant Willow Blossom, a wholly owned subsidiary of Willow Innovations, owns—via post-acquisition assignments from Chiaro Technology Limited—all right and title to the ‘388 Patent and the ‘D993 Patent asserted in this case. These patents are the subject of a non-exclusive license from Willow Blossom to Willow Innovations, and are embodied by at least the following commercialized products sold by Willow: the Elvie Pump wearable breast pump and the Elvie Pump Bottles replacement parts. Both sets of products are collectively referred to herein as “the DI Products.”

II. PUBLIC INTEREST CONSIDERATIONS

A. Explanation of how the Articles Potentially Subject to Remedial Orders Are Used in the United States

The Accused Products are wearable breast pumps and associated milk storage containers. They are used by individuals (e.g., mothers) to express milk discreetly, conveniently, and hands-free while continuing to move, work, travel, and care for their families.

B. Identification of Public Health, Safety, or Welfare Concerns

The requested remedies would have no adverse impact on U.S. public health, safety, or welfare. Alternative products are readily available in the United States, including the DI Products and noninfringing alternatives sold by various companies in the industry, including non-wearable breast pumps. Further, the Accused Products are not “game-changing” in any public interest sense, e.g., they do not contain any safety-related features or other benefits to nursing mothers absent from Willow’s patented products.

C. Identification of Like or Directly Competitive Articles

Willow is the pioneer and market leader of in-bra wearable breast pumps. Willow can and will adequately supply U.S. market demand for such products, and similar products from other companies, including non-wearable breast pumps offered by major brands, will remain readily available in the U.S. market.

D. Willow's Ability to Replace the Accused Products in a Commercially Reasonable Time in the United States

Willow is more than capable of replacing the volume of the Accused Products. Indeed, Willow is an established American company with a robust supply and distribution network. *See Certain Crystalline Cefadroxil Monohydrate*, Inv. No. 337-TA-293, Comm'n Op. at 46 (Mar. 15, 1990) (finding that, where complainant has "sufficient capacity and resources to satisfy all domestic demand," the public interest does not bar relief).

E. Impact of the Requested Remedial Orders on U.S. Consumers

After exclusion of the Accused Products, U.S. consumers will continue to have ready access to a diversity of breast pumps and associated milk storage containers, including Willow's DI Products and a multitude of non-wearable breast pump products sold by major brands throughout the United States. No public interest concerns exist where the market contains an adequate supply of competitive or substitute products for those subject to a remedial order. *See, e.g., Certain Lens Fitted Film Packages*, Inv. No. 337-TA-406, Comm'n Op. at 18 (June 28, 1999). Moreover, the concern about consumers is most acute in "cases where there is any evidence of price gouging or monopolistic practices in the domestic industry." *See* S. Rep. No. 93-1298, at 197 (1974). That is not the case here.

III. CONCLUSION

Given the type of articles involved in this matter, the ample supply of alternative products, the straightforward nature of the Complaint, the fact that this case involves a genuine American operating company seeking remedies against its direct (mostly foreign-based) competitors, and the information

presented in this submission, the Commission should decline to delegate public interest to the Administrative Law Judge. Such delegation would unnecessarily increase costs and complicate the adjudication of this investigation. Put simply, this case does not present an instance where the Commission, the ALJ, the parties, and non-parties should undergo the time and expense of discovery into public interest issues, presentation of evidence on public interest, and issuance of a Recommended Determination addressing public interest.

The public interest will be *served* by the exclusion of the Accused Products and the protection of Willow's intellectual property—as well as the protection of Willow's significant and substantial investments to develop and sell innovative products here in the United States.

Dated: August 19, 2026

Respectfully submitted,

/s/Beau Jackson

Beau Jackson

HUSCH BLACKWELL LLP

1801 Pennsylvania Avenue, NW

Suite 1000

Washington, DC 20006

Telephone: (202) 378-2406

Beau.Jackson@huschblackwell.com

Travis McCallon

Luke Meriwether

Eric Sidler

Timothy Hadachek

LATHROP GPM LLP

2345 Grand Blvd., Suite 2200

Kansas City, MO 64108

Telephone: (816) 292-2000

Travis.McCallon@lathropgpm.com

Luke.Meriwether@lathropgpm.com

Eric.Sidler@lathropgpm.com

Timothy.Hadachek@lathropgpm.com

Counsel for Complainants

Willow Innovations, Inc. and

Willow Blossom HoldCo Ltd.

UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC

In the Matter of

**CERTAIN WEARABLE BREAST
PUMPS, ASSOCIATED MILK STORAGE
CONTAINERS, AND COMPONENTS
THEREOF**

Inv. No. 337-TA-_____

**VERIFIED COMPLAINT UNDER SECTION 337 OF
THE TARIFF ACT OF 1930, AS AMENDED**

Complainants:

Willow Innovations, Inc.
1975 W El Camino Real, Suite 101
Mountain View, CA 94040
Telephone: (888) 945-5693

Willow Blossom HoldCo Ltd.
107 Cheapside, 9th Floor
London, United Kingdom, EC2V 6DN
Telephone: (888) 945-5693

Counsel for Complainants:

Beau Jackson
HUSCH BLACKWELL LLP
1801 Pennsylvania Avenue, NW
Suite 1000
Washington, DC 20006
Telephone: (202) 378-2406
Beau.Jackson@huschblackwell.com

Travis McCallon
Luke Meriwether
Eric Sidler
Timothy Hadachek
LATHROP GPM LLP
2323 Grand Blvd., Suite 800
Kansas City, MO 64108
Telephone: (816) 292-2000
Travis.McCallon@lathropgpm.com
Luke.Meriwether@lathropgpm.com

Proposed Respondents:

Shenzhen Root Innovation Technology Co.,
Ltd.
#2-201, Floor 2, Hasee Computer Building
No. 2 Beier Road, Bantian Street
Longgang, Shenzhen, Guangdong, China
518129
Telephone: +86 302-137-6102

Hong Kong Lute Technology Co., Ltd.
18121 E. Hampden Avenue, Unit C #1007
Aurora, CO 80013
Telephone: (619) 848-0676

Root Technology, Ltd.
9030 Wilshire Boulevard
Beverly Hills, California 90211
Telephone: (619) 848-0676

Share Info, Inc.
3557 158th Street
Flushing, New York 11358
Telephone: (929) 410-2964

Shenzhen TPH Technology Co., Ltd.
Room 203, 2nd Floor, Building 29
Lianchuang Technology Park II
No. 21 Bulan Road
Xialilang Community
Longgang District
Shenzhen, China 518100

Eric.Sidler@lathropgpm.com
Timothy.Hadachek@lathropgpm.com

Telephone: +86 755-8270-3212

Guangdong Horigen Mother & Baby Products
Co., Ltd.

No. 18 Pingnan Industrial Zone
Mianbei Street, Chaoyang District
Shantou City, Guangdong, China 515100
Telephone: +86 754-8361-3668

Anker Innovations Limited

Unit / Room 56, 8th Floor,
Admiralty Centre Tower
218 Harcourt Road
Hong Kong 000000
Telephone: +86 755-2698-0000

Fantasia Trading, LLC

5350 Ontario Mills Parkway, Suite 100
Ontario, California 91764
Telephone: (206) 383-8247

Power Mobile Life LLC

10800 NE 8th Street, Suite 900
Bellevue, Washington 98004
Telephone: (206) 383-8247

TPH Technology Malaysia Sdn Bhd

No. 2 (Block C) / 2C
Jalan Rawang Indah 1
Taman Industri Integrasi Rawang
48000 Rawang
Selangor, Malaysia 48000
Telephone: +60 3-0315-66471

Foshan Shunde Ruiteng Electrical Appliance
Manufacturing Co., Ltd. (a.k.a Joystar
Electrical Appliances Manufacturing Co.,
Ltd.)

No. 7 Xingye Road, Mould City (Tooling /
Mould City Industrial Area)
Shapu Village Committee
Jun'an Town, Shunde District
Foshan City, Guangdong, China 528329
Telephone: +86 757-2558-9308

Guangdong Youmeng Electrical Technology
Co., Ltd.
One of Area A, 3rd Floor, Factory Building 2,
No. 17, Keyuan 3rd Road
Science & Technology Industrial Park
Shunde High-tech Industrial Development
Zone
Xiaohuangpu Community
Ronggui Street, Shunde District
Foshan City, Guangdong Province, China
528300
Telephone: +86 155-7222-3444

TABLE OF CONTENTS

	Page
I. INTRODUCTION	1
II. COMPLAINANTS	19
A. Willow Innovations, Inc.....	19
B. Willow Blossom HoldCo Ltd	20
III. PROPOSED RESPONDENTS.....	21
A. Shenzhen Root Innovation Technology Co., Ltd.....	21
B. Hong Kong Lute Technology Co., Ltd	22
C. Root Technology, Ltd.....	23
D. Share Info, Inc.....	23
E. Shenzhen TPH Technology Co., Ltd	24
F. Guangdong Horigen Mother & Baby Products Co., Ltd	24
G. Anker Innovations Limited	25
H. Fantasia Trading LLC	25
I. Power Mobile Life LLC.....	26
J. Guangdong Youmeng Electrical Technology Co., Ltd	26
K. TPH Technology Malaysia Sdn Bhd.....	27
L. Foshan Shunde Ruiteng Electrical Appliance Manufacturing Co. Ltd. (a.k.a., Joystar Electrical Appliances Manufacturing Co. Ltd).....	27
IV. THE ASSERTED PATENTS AND NON-TECHNICAL DESCRIPTION OF THE INVENTIONS	28
A. Ownership of the Asserted Patents	28
B. U.S. Patent No. 11,660,380 (“the ‘380 Patent”)	28
C. U.S. Patent No. 12,370,292 (“the ‘292 Patent”)	30
D. U.S. Patent No. D 1,053,344 (“the ‘D344 Patent”)	32

E.	U.S. Patent No. 11,813,388 (“the ‘388 Patent”)	34
F.	U.S. Patent No. D 1,031,993 (“the ‘D993 Patent”)	37
G.	Counterparts of the Asserted Patents	38
H.	Licensees Under the Asserted Patents.....	39
V.	THE TECHNOLOGY AND PRODUCTS AT ISSUE.....	39
VI.	RESPONDENTS’ UNLAWFUL AND UNFAIR ACTS	39
VII.	SPECIFIC INSTANCES OF UNFAIR IMPORTATION AND SALE	46
A.	Shenzhen Root Innovation Technology Co., Ltd.....	47
B.	Hong Kong Lute Technology Co., Ltd	53
C.	Root Technology, Ltd.....	54
D.	Share Info, Inc.....	55
E.	Shenzhen TPH Technology Co., Ltd	56
F.	Guangdong Horigen Mother & Baby Products Co., Ltd	57
G.	Anker Innovations Limited	59
H.	Fantasia Trading LLC	61
I.	Power Mobile Life LLC.....	62
J.	Guangdong Youmeng Electrical Technology Co., Ltd	63
K.	TPH Technology Malaysia Sdn Bhd.....	64
L.	Foshan Shunde Ruiteng Electrical Appliance Manufacturing Co. Ltd. (a.k.a., Joystar Electrical Appliances Manufacturing Co. Ltd).....	64
VIII.	HARMONIZED TARIFF SCHEDULE NUMBERS	67
IX.	LITIGATION AND RELATED PROCEEDINGS	67
X.	DOMESTIC INDUSTRY	68
A.	The DI Products Practice the Asserted Patents	68
B.	Willow’s Investments in the United States Relating to Products that Embody the Willow Asserted Patents	70

1.	Significant Investment in Plant and Equipment.....	70
2.	Significant Employment of Labor and Capital	71
3.	Substantial Investments in Engineering, Research, and Development	71
C.	Willow’s Acquisition of Elvie and the Associated Domestic Industry that Exists or is in the Process of Being Established	72
XI.	REQUEST FOR RELIEF	74

LIST OF EXHIBITS

<u>No.</u>	<u>Description</u>
-------------------	---------------------------

- | | |
|----|---|
| 1. | Copies of Asserted Patents |
| 1A | Uncertified copy of 11,660,380 patent |
| 1B | Uncertified copy of 12,370,292 patent |
| 1C | Uncertified copy of D1,053,344 patent |
| 1D | Uncertified copy of 11,813,388 patent |
| 1E | Uncertified copy of D1,031,993 patent |
| 2. | Copies of Assignments of Asserted Patents |
| 2A | Uncertified copy of assignment record for 11,660,380 patent |
| 2B | Uncertified copy of assignment record for 12,370,292 patent |
| 2C | Uncertified copy of assignment record for D1,053,344 patent |
| 2D | Uncertified copy of assignment record for 11,813,388 patent |
| 2E | Uncertified copy of assignment record for D1,031,993 patent |
| 3. | CONFIDENTIAL DI Declaration of Sarah O’Leary |
| 4. | Claims Charts Showing Domestic Industry Products Practice the Asserted Patents |
| 4A | Claim Chart showing Willow Go practices the 11,660,380 patent |
| 4B | Claim Chart showing Willow 360 practices the 11,660,380 patent |
| 4C | Claim Chart showing Willow Go practices the 12,370,292 patent |
| 4D | Claim Chart showing Willow 360 practices the 12,370,292 patent |
| 4E | Claim Chart showing Willow Go practices the D1,053,344 patent |
| 4F | Claim Chart showing Elvie Pump practices the 11,813,388 patent |
| 4G | Claim Chart showing Elvie Pump practices the D1,031,993 patent |
| 5. | Claim Charts Showing Infringement of the Asserted Patents by the Accused Products |
| 5A | Claim Chart showing Momcozy Air 1 infringes claim 1 of 11,660,380 Patent |
| 5B | Claim Chart showing Momcozy Wellness 1 infringes claim 1 of 11,660,380 Patent |
| 5C | Claim Chart showing Momcozy M6 infringes claim 1 of 11,660,380 Patent |
| 5D | Claim Chart showing Momcozy M5 Smart infringes claim 1 of 11,660,380 Patent |
| 5E | Claim Chart showing Momcozy S12 Pro infringes claim 1 of 11,660,380 Patent |
| 5F | Claim Chart showing Momcozy S9 Pro infringes claim 1 of 11,660,380 Patent |

- 5G Claim Chart showing Eufy S1 Pro infringes claim 1 of 11,660,380 Patent
- 5H Claim Chart showing Eufy S2 Pro infringes claim 1 of 11,660,380 Patent
- 5I Claim Chart showing Momcozy M9 infringes claim 1 of 12,370,292 Patent
- 5J Claim Chart showing Momcozy Air 1 infringes D1,053,344 Patent
- 5K Claim Chart showing Momcozy Wellness 1 infringes D1,053,344 Patent
- 5L Claim Chart showing Eufy S2 Pro infringes D1,053,344 Patent
- 5M Claim Chart showing Momcozy M9 infringes claim 1 of 11,813,388 Patent
- 5N Claim Chart showing Momcozy M6 infringes claim 1 of 11,813,388 Patent
- 5O Claim Chart showing Momcozy Wellness 1 infringes claim 1 of 11,813,388 Patent
- 5P Claim Chart showing Momcozy M9 infringes D1,031,993 Patent

- 6. CONFIDENTIAL List of Licensees of the Asserted Patents
- 7. Screenshots from FDA website linking Youmeng to Momcozy pumps
- 8. Momcozy M5 Packaging and Product
- 9. Momcozy M5 purchase receipt
- 10. Momcozy M5 instruction manual
- 11. Momcozy M5 website screenshots
- 12. Momcozy M6 Packaging and Product
- 13. Momcozy M6 purchase receipt
- 14. Momcozy M6 instruction manual
- 15. Momcozy M6 website screenshots
- 16. Momcozy M9 Packaging and Product
- 17. Momcozy M9 purchase receipt
- 18. Momcozy M9 instruction manual
- 19. Momcozy M9 website screenshots
- 20. Momcozy Wellness 1 Packaging and Product

21. Momcozy Wellness 1 purchase receipt
22. Momcozy Wellness 1 instruction manual
23. Momcozy Wellness 1 website screenshots
24. Momcozy Air 1 Packaging and Product
25. Momcozy Air 1 purchase receipt
26. Momcozy Air 1 instruction manual
27. Momcozy Air 1 website screenshots
28. Momcozy S12 Packaging and Product
29. Momcozy S12 purchase receipt
30. Momcozy S12 instruction manual
31. Momcozy S12 website screenshots
32. Momcozy S9 Packaging and Product
33. Momcozy S9 purchase receipt
34. Momcozy S9 instruction manual
35. Momcozy S9 website screenshots
36. Momcozy Air 1 Replacement Part / Milk Collector Packaging and Product
37. Momcozy Air 1 replacement part / milk collector purchase receipt
38. Momcozy Air 1 replacement part / milk collector website screenshots
39. Screenshots from FDA website linking Joystar to Momcozy pumps
40. Descartes Datamyne records for Youmeng
41. Momcozy Wellness 1 replacement part / milk collector website screenshots
42. Momcozy M9 overall replacement parts and milk collector replacement parts packaging and product
43. Momcozy M9 overall replacement parts and milk collector replacement parts purchase receipt

44. Momcozy M9 overall replacement parts and milk collector replacement parts website screenshots
45. Share Info Secretary of State screenshots
46. Hong Kong Lute Secretary of State screenshots
47. Screenshots from Momcozy website showing addresses in the United States and Hong Kong for Hong Kong Lute and Root Technology
48. Root Technology Secretary of State screenshots
49. Descartes Datamyne Report for Shenzhen TPH
50. Momcozy's Answer to Amended Counterclaims, Affirmative Defenses, and Counter-Counterclaims Filed in *Shenzhen Root Technology Co., ltd. et al. v. Chiaro Technology Ltd.; Western District of Washington Case No. 23-cv-00631*
51. Descartes Datamyne records for Horigen
52. TPH's Answer to Amended Counterclaims, Affirmative Defenses, Counter-Counterclaims, and Cross-Claims Filed in *Shenzhen Root Technology Co., ltd. et al. v. Chiaro Technology Ltd.; Western District of Washington Case No. 23-cv-00631*
53. Eufy S1 Pro Packaging and Product
54. Eufy S1 Pro purchase receipt
55. Eufy S1 Pro instruction manual
56. Eufy S1 Pro website screenshots
57. Eufy S2 Pro Packaging and Product
58. Eufy S2 Pro purchase receipt
59. Eufy S2 Pro instruction manual
60. Eufy S2 Pro website screenshots
61. Eufy S2 Replacement Part / Milk Collector Packaging and Product
62. Eufy S2 Replacement Part / Milk Collector Purchase Receipt
63. Eufy S2 Replacement Part / Milk Collector website screenshots
64. Screenshots from Anker Innovation's website identifying Eufy as one of its brands

65. Report from TESS System showing Eufy Baby Trademark Owner is Anker Innovations Limited
66. Descartes Datamyne records for Anker Innovations
67. Fantasia Trading Secretary of State Screenshots
68. Screenshots from Eufy's website showing copyright notice for Fantasia Trading
69. Descartes Datamyne records for Fantasia Trading
70. Power Mobile Life Secretary of State screenshots
71. Descartes Datamyne records for Power Mobile Life
72. Screenshots from FDA website linking Horigen to various wearable breast pump products
73. Screenshots from Horigen's website showing sale of wearable breast pump products
74. Descartes Datamyne records for TPH Technology
75. Screenshots from Willow's website regarding the Willow Go
76. Screenshots from Willow's website regarding the Willow 360
77. Screenshots from Willow's website regarding the Elvie Pump
78. Screenshots from Willow's website regarding the Willow Go Splashguard Container
79. Screenshots from Willow's website regarding the Elvie Pump bottle product
80. FN screenshot of Momcozy's website comparing differences between the M5 products
81. FN screenshot of Momcozy's website comparing differences between the S12 products
82. FN screenshot of Eufy's website comparing differences between the S1 and S1 Pro products
83. Screenshots from the FDA website linking Shenzhen Root to breast pumps
84. Screenshots from the FDA website linking Hong Kong Lute to Momcozy breast pumps
85. Screenshots from the FDA website linking Shenzhen TPH to Eufy pumps
86. Chart of Foreign Counterparts associated with U.S. Patent Nos. 11,660,380, 12,370,292 and 11,813,388

87. Eufy S1 Packaging and Product, Purchase Receipt and Eufy S1 Website Screenshots

LIST OF APPENDICES

<u>Appendix</u>	<u>Description</u>
A.	Uncertified copy of Prosecution History of 11,660,380 patent
B.	Uncertified copy of Prosecution History of 12,370,292 patent
C.	Uncertified copy of Prosecution History of D1,053,344 patent
D.	Uncertified copy of Prosecution History of 11,813,388 patent
E.	Uncertified copy of Prosecution History of D1,031,993 patent
F.	Non-certified copy of the Prosecution History of the Priority Applications related to the Asserted Patents

I. INTRODUCTION

1. Willow Innovations, Inc. (“Willow Innovations”) and Willow Blossom HoldCo Ltd. (“Willow Blossom”) (collectively, “Willow” or “Complainants”) files this complaint pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337 (“Section 337”), based on the unlawful importation into the United States, the sale for importation into the United States, and/or the sale within the United States after importation of certain wearable breast pumps, associated milk storage containers, and components thereof.

2. The proposed Respondents are Shenzhen Root Innovation Technology Co. Ltd. (*manufacturer and/or shipper and/or importer and/or distributor of the Accused Momcozy Products*), Hong Kong Lute Technology Co., Ltd. (*manufacturer and/or shipper of the Accused Momcozy Products*), Root Technology, Ltd. (*importer and/or distributor of the Accused Momcozy Products*), Share Info, Inc. (*shipper and/or importer and/or distributor of the Accused Momcozy Products*), Shenzhen TPH Technology Co., Ltd. (*manufacturer, shipper and/or importer of the Accused Momcozy Products & the Accused Eufy Products*), Guangdong Horigen Mother & Baby Products Co., Ltd. (*manufacturer, and/or shipper and/or importer of the Accused Momcozy Products*), Anker Innovations Ltd. (*shipper and/or importer and/or distributor of the Accused Eufy Products*), Fantasia Trading LLC (*importer and/or distributor of the Accused Eufy Products*), Power Mobile Life LLC (*importer and/or distributor of the Accused Eufy Products*), Guangdong Youmeng Electrical Technology Co., Ltd. (*manufacturer and/or shipper and/or importer of the Accused Momcozy Products*), TPH Technology Malaysia Sdn Bhd (*manufacturer and/or shipper and/or importer of the Accused Eufy Products*), and Foshan Shunde Ruiteng Electrical Appliance Manufacturing Co. Ltd. (a.k.a Joystar Electrical Appliances Manufacturing Co., Ltd.) (*manufacturer and/or shipper and/or importer of the Accused Momcozy Products*) (collectively, “Respondents”).

3. The complaint is directed to Respondents' imported wearable breast pumps, associated milk storage containers, and components thereof that infringe one or more claims of U.S. Patent No. 11,660,380 ("the '380 Patent"), one or more claims of U.S. Patent No. 12,370,292 ("the '292 Patent"), one or more claims of U.S. Patent No. D1,053,344 ("the 'D344 Patent"), one or more claims of U.S. Patent No. 11,813,388 ("the '388 Patent"), and one or more claims of U.S. Patent No. D1,031,993 ("the 'D993 Patent") (collectively, the "Asserted Patents").

4. Respondents' infringing products include, but are not limited to, wearable breast pump products, associated milk storage containers, and components thereof imported and sold under at least the following names, brands, and/or labels:

- *"Momcozy" branded wearable breast pumps:*
 - M5
 - M5 Lite
 - M5 Smart
 - M6 or Mobile Style
 - M9 or Mobile Flow
 - Wellness 1
 - Air 1
 - S12
 - S12 Pro
 - S12 Pro Quick
 - S9
 - S9 Pro
 - Air 1 replacement parts, specifically the "milk collector"
 - Wellness 1 replacement parts, specifically the "milk collector"
 - M9 replacement parts, specifically the "overall" replacement parts and "milk collector & storage lid"
- *"Eufy" branded wearable breast pumps:*
 - S1
 - S1 Pro
 - S2
 - S2 Pro
 - E20
 - S2 / S2 Pro replacement parts, specifically the "milk container"

(collectively, the “Accused Products”).¹

5. The following is a list of patents and claims asserted by Willow (independent claims underlined and in bold), along with the corresponding, representative accused products known to Willow at this time:

ASSERTED PATENT	ASSERTED CLAIMS	REPRESENTATIVE ACCUSED PRODUCTS
‘380 Patent	<u>1</u> , 6, 7, 8, 9	Momcozy Products: Air 1, Wellness 1, M6, M5, M5 Lite, M5 Smart, S12, S12 Pro, S12 Pro Quick, S9, and S9 Pro Eufy Products: S1, S1 Pro, S2, S2 Pro, and E20
‘292 Patent	<u>1</u> , 2, 3, 5, 7, 8, 9, 10, 11, 12	Momcozy Product: M9
‘D344 Patent	Single design claim	Momcozy Products: Air 1 and Wellness 1, Air 1 milk collector, Wellness 1 milk collector Eufy Products: S2, S2 Pro, and S2/S2 Pro milk container
‘388 Patent	<u>1</u> , 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 17, 19, 20, 21, 22, 23, 27, 30	Momcozy Products: M9, M6, and Wellness 1
‘D993 Patent	Single design claim	Momcozy Product: M9 and M9 milk collector

6. Willow is a bona fide American innovator and a significant U.S. employer. The Willow products practicing the Asserted Patents were developed and continue to be refined by

¹ The identification of a specific model or type of device is not intended to limit the scope of this investigation. Discovery may reveal that additional products (Momcozy, Eufy, or otherwise) infringe any of the Asserted Patents and/or that additional claims are infringed, and any remedies should extend to all infringing wearable breast pumps, associated milk storage containers, and components thereof, regardless of how marketed, branded, labeled, or sold.

American citizens working in the United States. By contrast, the Accused Products were, on information and belief, all developed overseas and, upon information and belief, the Respondents do not have any meaningful presence in the United States.

7. Founded in the Bay Area in 2014, Willow has distinguished itself as the category-defining innovator in the maternal health and technology (or FemTech) space. In 2017, after years of time, resources, and money invested in research and development, Willow released the industry's first all-in-one, fully wearable, in-bra breast pump product. This reimagining of the traditional breast pump as a discreetly in-bra wearable, mobile, and digitally connected device was a pioneering advance.

8. Indeed, this revolutionary innovation allowed busy mothers the ability to express milk discreetly, conveniently, and hands-free while continuing to move, work, travel, and care for their families. Willow's breakthrough technology remedied some of the longstanding limitations associated with conventional breast pumps—external tubing, clunky cords, dangling bottles, stationary use, cumbersome and/or insufficient pump motors, and overall inconvenience to nursing mothers—and set Willow and its products apart in the FemTech and maternal care spaces as the gold standard for in-bra wearable breast pumps and associated accessories.

9. Since that time, Willow has continued to innovate by integrating advanced engineering, clinical design, and digital technology to lead the industry in the creation of in-bra wearable breast pumps and associated milk storage container products. In furtherance of those commitments, in March 2025, Willow (through its wholly owned subsidiary, Willow Blossom) completed an acquisition of certain assets of Chiaro Technology Limited, a United Kingdom-based innovator of women's health products, including breast pumps sold under the "Elvie" brand. The transaction included assets associated with the Elvie brand and product lines (including Elvie

branded breast pumps) and united two of the most influential brands in maternal and women's health to create a scaled, U.S.-led Femtech platform with a U.S. focus but a global reach. The acquisition further strengthened Willow's commitment to women-first design and innovation, and increased its ability to continue delivering comprehensive, next generation technology-enabled solutions that improve outcomes for mothers and families across the United States and around the world. Today, Willow is one of the highest rated global leaders in the wearable breast pump industry.

10. Pertinent to this matter, Willow develops, designs, creates, markets, and sells wearable breast pump products and associated milk storage containers that maximize freedom of movement for busy mothers while maintaining reliable performance—implementing hospital-grade suction to maximize milk output, leak-proof technology allowing mothers to pump in virtually any position, pump configurations with extreme comfortability, and software and wireless connectivity allowing busy mothers to remotely control and track all aspects of their breast pumping journey. These wearable breast pump products and associated milk storage containers, and specifically those practicing claims of the Asserted Patents, currently are and have been sold in the United States by Willow under names including the Willow Go® wearable breast pump, the Willow 360® wearable breast pump, the Elvie Pump wearable breast pump, the Willow Go® Splashguard Container Set, and the Elvie Pump Bottles, as shown below:

WILLOW GO PUMP	WILLOW 360 PUMP	ELVIE PUMP
 	 	 
WILLOW GO SPLASHGUARD CONTAINER		ELVIE PUMP BOTTLES
		

11. As described in greater detail below, Complainant Willow Innovations owns all right and title to the ‘380 Patent, the ‘292 Patent, and the ‘D344 Patent (“the Willow Patents”) asserted in this case, which are embodied by at least the following commercialized products sold by Willow: Willow Go® wearable breast pump, Willow 360® wearable breast pump, and Willow Go® Splashguard Container Set replacement parts (“the Willow DI Products”). Complainant Willow Blossom, a wholly owned subsidiary of Willow Innovations, owns—via post-acquisition assignments from Chiaro Technology Limited—all right and title to the ‘388 Patent and the ‘D993 Patent (“the Elvie Patents”) asserted in this case. These patents are the subject of a non-exclusive license from Willow Blossom to Willow Innovations, and are embodied by at least the following commercialized products sold by Willow: the Elvie Pump wearable breast pump and the Elvie Pump Bottles replacement parts (“the Elvie DI Products”). Both sets of products are collectively referred to herein as “the DI Products.”

12. Respondents manufacture, import, sell, and/or offer for sale wearable breast pump products and associated milk storage containers that infringe one or more claims of the Asserted Patents, as shown and described in more detail below. These products incorporate proprietary technology developed at significant effort and expense by Willow, and their proliferation at low cost in overseas manufacturing centers, and concomitant growing U.S. sales, have undermined Willow’s pioneering advances and significantly degraded Willow’s market position.

Respondents & Accused Products Presently Known
<u>GROUP 1 - The Momcozy Respondents:</u> Shenzhen Root Innovation Technology Co., Ltd. (“Shenzhen Root”) Hong Kong Lute Technology Co., Ltd. (“Hong Kong Lute”) Root Technology, Ltd. (“Root Technology”) Share Info, Inc. (“Share Info”) Shenzhen TPH Technology Co., Ltd. (“Shenzhen TPH”) Guangdong Horigen Mother & Baby Products Co., Ltd. (“Horigen Mother & Baby”) Foshan Shunde Ruiteng Electrical Appliance Manufacturing Co. Ltd. (a.k.a. Joystar Electrical Appliances Manufacturing Co., Ltd.) (“Joystar Electrical”) Guangdong Youmeng Electrical Technology Co., Ltd. (“Youmeng”) <u>Accused Products (collectively referred to as the “Accused Momcozy Products”):</u> M5 M5 Lite M5 Smart M6 or Mobile Style (“M6”) M9 or Mobile Flow (“M9”) Wellness 1 or W1 (“Wellness 1”) Air 1 S12 S12 Pro S12 Pro Quick S9 S9 Pro Air 1 replacement parts, specifically the “milk collector” Wellness 1 replacement parts, specifically the “milk collector” M9 replacement parts, specifically the “overall” replacement parts and “milk collector & storage lid”

Exemplary websites where the Accused Momcozy Products are available for purchase in the United States:

Products: M5 / M5 Lite / M5 Smart² (collectively referred to as “M5”)

https://momcozy.com/products/m5-smart-wearable-breast-pump-upgraded-with-app-control?ref=menu_3_1_3_img&variant=45110887514310

https://www.amazon.com/Momcozy-Electric-Breast-M5-Wearable/dp/B0F7XTHCNY?ref_=ast_sto_dp&th=1



² Upon information and belief, the accused Momcozy M5, M5 Lite, and M5 Smart products are structurally the same wearable breast pump product. The only differences are things like nonstructural upgrades to allow for app control and a longer battery life according to Momcozy’s own website. *See Exhibit 80.* As such, Willow refers herein to the M5 Smart product as representative of all Momcozy M5 labeled products.

Product: M6 or Mobile Style (“M6”)

<https://momcozy.com/collections/fsa-hsa-hands-free-pumping/products/momcozy-mobile-style-hands-free-breast-pump?variant=43054628995270>

https://www.amazon.com/Momcozy-Double-Hands-Breast-Electric/dp/B0BSVB77WS?ref=ast_sto_dp&th=1



Product: M9 or Mobile Flow (“M9”) and M9 replacement parts, specifically the “milk collector”³

<https://momcozy.com/collections/fsa-hsa-hands-free-pumping/products/momcozy-mobile-flow-hands-free-breast-pump?variant=43846410830022>

https://www.amazon.com/Momcozy-Upgraded-Discreet-Personalized-Multi-Modes/dp/B0FWJNV7S8?ref=ast_sto_dp&th=1

https://momcozy.com/products/mobile-flow%E2%84%A2-m9-wearable-breast-pump-replacement-parts?ref=menu_3_4_3_img&variant=44018768347334



³ The accused M9 product itself contains the same milk collector as is sold separately as a replacement part. As such, Willow refers herein to the M9 product as representative of all M9 labeled products and replacement milk collectors.

Product: Wellness 1 and Wellness 1 replacement parts, specifically the “milk collector”⁴

<https://momcozy.com/collections/fsa-hsa-hands-free-pumping/products/momcozy-wellness-1-warm-massage-wearable-breast-pump-w1>

https://www.amazon.com/Momcozy-Warm-Massage-Comfortable-Breastfeeding-App-Controlled/dp/B0G6417BM1?ref=ast_sto_dp&th=1

https://momcozy.com/products/wellness-1-warm-massage-breast-pump-replacement-parts?ref=menu_3_4_1_img&variant=45793606631622



Product: Air 1 and Air 1 replacement parts, specifically the “milk collector”⁵

<https://momcozy.com/collections/fsa-hsa-hands-free-pumping/products/momcozy-air-1-ultra-slim-breast-pump?variant=44479007621318>

https://www.amazon.com/Momcozy-Ultra-Slim-Hands-Free-Switching-Transparent/dp/B0DBYF4Z6L?ref=ast_sto_dp&th=1

https://momcozy.com/products/air-1-ultra-slim-wearable-breast-pump-replacement-parts?ref=menu_3_4_2_img&variant=44883820708038



⁴ The accused Wellness 1 product itself contains the same milk collector as is sold separately as a replacement part. As such, Willow refers herein to the Wellness 1 product as representative of all Wellness 1 labeled products and replacement milk collectors.

⁵ The accused Air 1 product itself contains the same milk collector as is sold separately as a replacement part. As such, Willow refers herein to the Air 1 product as representative of all air 1 labeled products and replacement milk collectors.

Products: S12, S12 Pro, and S12 Pro Quick⁶ (collectively referred to as “S12”)

<https://momcozy.com/collections/fsa-hsa-hands-free-pumping/products/s12-pro-quick-wearable-breast-pump?variant=45528303861958>

https://www.amazon.com/Momcozy-Breast-Wearable-Portable-Wireless/dp/B0CWTYWM5M?ref=ast_sto_dp&th=1



⁶ Upon information and belief, the accused Momcozy S12, S12 Pro, and S12 Pro Quick are structurally the same wearable breast pump product. The only differences are things like non-structural upgrades to allow for app control, a longer battery life, heating sensors and the like. *See Exhibit 81.* As such, Willow refers herein to the S12 Pro product as representative of all Momcozy S12 labeled products.

Product: S9 and S9 Pro⁷ (collectively referred to as “S9”)

<https://momcozy.com/collections/fsa-hsa-hands-free-pumping/products/momcozy-s9-pro-wearable-breast-pump?variant=42680176738502>

https://www.amazon.com/Momcozy-Wearable-Electric-Convenient-Chartreuse/dp/B0DLFKN6LL?ref=ast_sto_dp&th=1



⁷ Upon information and belief, the accused Momcozy S9 and S9 Pro are structurally the same wearable breast pump product. The only differences are things like non-structural upgrades to allow for app control, a longer battery life, heating sensors and the like. As such, Willow refers herein to the S9 Pro product as representative of all Momcozy S9 labeled products.

GROUP 2 - The Eufy Respondents:

Anker Innovations Ltd. (“Anker Innovations”)

Fantasia Trading LLC (“Fantasia Trading”)

Power Mobile Life LLC (“Power Mobile”)

Shenzhen TPH Technology Co., Ltd. (“Shenzhen TPH”)

TPH Technology Malaysia Sdn Bhd (“TPH Technology”)

Accused Products (collectively referred to as the “Accused Eufy Products”):

S1

S1 Pro

E20

S2

S2 Pro

S2 / S2 Pro replacement parts, specifically the “milk container”

Exemplary websites where the Accused Eufy Products are available for purchase in the United States:

Products: S1, S1 Pro, and E20⁸ (collectively referred to as “S1”)

<https://www.eufy.com/products/t8d02181?variant=43660278366394>

<https://www.eufy.com/products/t8d04121?variant=43660277121210>

https://www.amazon.com/eufy-Security-Industry-Leading-App-Controlled-Hospital-Grade/dp/B0CYZD34VF?ref_=ast_sto_dp&th=1

https://www.amazon.com/eufy-Hands-Free-App-Controlled-Hospital-Grade-Ultra-Quiet/dp/B0CYZLT7M2?ref_=ast_sto_dp&th=1

<https://www.eufy.com/products/t6060121?variant=44930661056698>

https://www.amazon.com/eufy-Security-Hands-Free-Innovative-Hospital-Grade/dp/B0DZCLRGQZ?ref_=ast_sto_dp

⁸ The accused Eufy S1, S1 Pro, and E20 products are structurally the same wearable breast pump product. According to Eufy’s own website, the structure and core functionalities are the same between the three products. The only difference between the S1 and S1 Pro is the “charging setup” or how the products are charged. See **Exhibit 82**. The only differences between the S1 and E20 are the number of heating levels, charging methods, and the number of accessories sold with the product. As such, Willow refers herein to the S1 Pro product as representative of all Eufy S1 and E20 labeled products.



Product: S2 and S2 Pro⁹ and S2 / S2 Pro replacement parts, specifically the “milk container” (collectively referred to as “S2”)

<https://www.eufy.com/products/t600p181-eufy-wearable-breast-pump-s2-pro?variant=45674637492410>

https://www.amazon.com/eufy-Security-Wearable-HeatFlow-Double-Sealed/dp/B0H397M824?ref=ast_sto_dp&th=1

https://www.amazon.com/eufy-Security-Wearable-Breast-Container/dp/B0H45JXK4C?ref=ast_sto_dp

⁹ Upon information and belief, the accused Eufy S2 and S2 Pro are structurally the same wearable breast pump product. The only differences are things like non-structural upgrades to allow for app control, a longer battery life, heating sensors and the like. In addition, the S2 and S2 Pro each include the same milk container as is sold separately as a replacement part. As such, Willow refers herein to the S2 Pro product as representative of all Eufy S2 labeled products and replacement milk containers.



13. On information and belief, and as documented in multiple Exhibits included with this Complaint, the Accused Products are manufactured and/or sold for importation into the United States, imported into the United States, and/or sold within the United States after importation by or on behalf of Respondents.

14. An industry as required by 19 U.S.C. §§ 1337(a)(2) and (3) exists and/or is in the process of being established in the United States relating to articles protected by the Asserted Patents. Details on Willow's domestic industry are provided in Section X, below.

15. This case epitomizes what Congress envisioned in enacting Section 337, where: (a) there is a bona fide American company developing innovative, proprietary articles in the United States; (b) said American company has been severely impacted in the marketplace by the proliferation of copycat infringing products developed overseas; (c) it would be difficult to remedy the unfair acts in a district court due to, *inter alia*, jurisdictional issues and challenges with foreign discovery; and (d) supply chains are ambiguous and amorphous, and the complainant thus requires a trade-based, border-enforcement remedy to prevent the continued U.S. importation and sale of infringing products by a multitude of entities.

16. Willow seeks as relief a permanent limited exclusion order prohibiting, *inter alia*, entry into the United States of Respondents' wearable breast pumps, associated milk storage containers, and components thereof.

17. Willow also seeks permanent cease and desist orders prohibiting Respondents from, *inter alia*, importing, admitting or withdrawing from a foreign trade zone, marketing, advertising, demonstrating, warehousing inventory, distributing, using after importation, offering for sale, selling, transferring, licensing, repairing, or servicing their wearable breast pumps, associated milk storage containers, and components thereof.

18. Further, Willow requests that the Commission impose a bond upon the Respondents' importations and sales of the Accused Products during the sixty-day period for Presidential review, to prevent further substantial injury to Willow's domestic industry.

II. COMPLAINANTS

A. Willow Innovations, Inc

19. Complainant Willow Innovations is a corporation organized and existing under the laws of the state of Delaware, having a principal place of business at 1975 W. El Camino Real, Suite 101, Mountain View, California 94040.

20. Willow Innovations is a U.S. and worldwide leader in the design and creation of in-bra wearable breast pump products, associated milk storage containers, and related accessories and replacement parts. Willow Innovations designs, develops, markets, and sells wearable breast pump products, associated milk storage containers, and components thereof in the United States, including with respect to the Willow DI Products.

21. To support its substantial line of consumer products, including the Willow DI Products, Willow Innovations (a U.S. headquartered company) employs approximately 68 individuals in the United States.

22. As described herein, Willow Innovations has made and continues to make significant and substantial domestic investments relating to the design, development, research, testing, production, distribution, marketing, sale, and support of its wearable breast pump products, associated milk storage containers, and components thereof, including with respect to the Willow DI Products.

23. As a result of these sustained and ongoing investments, Willow Innovations has offered and continues to sell at least 5 different wearable, manual, and electric breast pump products and a number of associated milk storage containers and bags, plus a diverse variety of related accessories, components, and replacement parts, making Willow one of the top-selling brands of in-bra wearable breast pumps, associated milk storage containers, and accessories in the United States, and one of the most recognizable and respected worldwide brands in the FemTech industry.

24. Willow Innovations exclusively owns the entire right and title to the Willow Patents: the '380 Patent, the '292 Patent, and the 'D344 Patent.

B. Willow Blossom HoldCo Ltd

25. Complainant Willow Blossom is a corporation organized and existing under the laws of the United Kingdom, having a principal place of business at 107 Cheapside, 9th Floor, London, United Kingdom, EC2V 6DN, and is a wholly owned subsidiary of Complainant Willow Innovations.

26. Created in March 2025 as a result of the acquisition of certain assets of Chiaro Technology Limited, a United Kingdom-based innovator of women's health products, including breast pumps, Willow Blossom united two of the most influential brands in maternal and women's health to create a scaled, U.S.-led Femtech platform with a U.S. focus and a global reach. At the direction of and along with Willow Innovations, Willow Blossom designs, develops, markets, and

sells in-bra wearable breast pump products, associated milk storage containers, and components thereof in the United States, including with respect to the Elvie DI Products.

27. As described herein, Willow Blossom and Willow Innovations have made, continue to make, and are in the process of making significant and substantial domestic investments relating to the design, development, research, testing, production, distribution, marketing, sale, and support of wearable breast pump products, associated milk storage containers, and components thereof, including with respect to the Elvie DI Products.

28. Willow Blossom exclusively owns the entire right and title to the Elvie Patents: the ‘388 Patent and the ‘D993 Patent. These patents are the subject of a non-exclusive license from Willow Blossom to Willow Innovations, as detailed in Section IV.

III. PROPOSED RESPONDENTS

29. It is abundantly clear that Respondents are importing the Accused Products through a complex and opaque web (perhaps by design) of supply chains involving affiliated entities, distributors, resellers, customs brokers, contract manufacturers, and third-party logistics providers that often operate under multiple names and/or abbreviated titles. As a result, at times, these networks can obscure the identity of the shipper or importer, the exact nature of the imported products, and the volume and timing of importation. Nonetheless, Willow conducted a thorough investigation to determine the appropriate Respondents to specifically name in this matter based upon a variety of different sources of evidence and information, as set forth in greater detail below in Section VII regarding specific instances of importation for the Accused Products.

A. Shenzhen Root Innovation Technology Co., Ltd

30. Proposed Respondent Shenzhen Root Innovation Technology Co., Ltd. (“Shenzhen Root”) is a company organized and existing under the laws of China, having a principal place of

business at #2-201, Floor 2, Hasee Computer Building, No. 2 Beier Road, Bantian Street, Longgang, Shenzhen, Guangdong, China 518129.

31. Upon information and belief, Shenzhen Root does business as “Momcozy” and frequently identifies itself as such.

32. Upon information and belief, and as described in more detail in Section VII below, Shenzhen Root, among other things, is engaged in the sale for importation into the United States and/or importation of wearable breast pumps, associated milk storage containers, and components thereof, including all the Accused Momcozy Products. Upon information and belief, Shenzhen Root, through various agents (including co-Respondents), manufactures these products in China, and then sells them for importation and/or facilitates their importation into the United States.

B. Hong Kong Lute Technology Co., Ltd

33. Proposed Respondent Hong Kong Lute Technology Co., Ltd. (“Hong Kong Lute”) is, on information and belief, a Colorado company organized and existing under the laws of the United States, with a principal place of business at 18121 E. Hampden Avenue, Unit C #1007, Aurora, Colorado 80013.

34. Upon information and belief, Hong Kong Lute (like Shenzhen Root) does business as “Momcozy,” and frequently identifies itself as such.

35. Upon information and belief, and as described in more detail in Section VII below, Hong Kong Lute, among other things, is engaged in the sale for importation into the United States and/or importation of wearable breast pumps, associated milk storage containers, and components thereof, including the Accused Momcozy Products. Upon information and belief, and as described in more detail in Section VII below, Hong Kong Lute, through various agents (including co-Respondents), manufactures these products in China, and then sells them for importation and/or facilitates their importation into the United States. Attached as **Exhibit 46** are true and accurate

screenshots taken from the website of the Colorado Secretary of State showing Hong Kong Lute is a Colorado Corporation and its location in Aurora, Colorado.

C. Root Technology, Ltd

36. Proposed Respondent Root Technology, Ltd. (“Root Technology”) is, on information and belief, a California company organized and existing under the laws of the United States, with a principal place of business at 9030 Wilshire Boulevard, Beverly Hills, California 90211.

37. Upon information and belief, Root Technology (like Hong Kong Lute and Shenzhen Root) does business as “Momcozy” and frequently identifies itself as such.

38. Upon information and belief, and as described in more detail in Section VII below, Root Technology is, among other things, engaged in the importation into the United States and/or sale after importation of wearable breast pumps, associated milk storage containers, and components thereof, including all the Accused Momcozy Products. Attached as **Exhibit 48** are true and accurate screenshots taken from the website of the California Secretary of State showing Root Technology is a California company and its location in Beverly Hills, California.

D. Share Info, Inc

39. Proposed Respondent Share Info, Inc. (“Share Info”) is, on information and belief, a New York company organized and existing under the laws of the United States, with a principal place of business at 3557 158th Street, Flushing, New York 11358. Attached as **Exhibit 45** are true and accurate screenshots taken from the website of the New York Secretary of State showing Share Info is a New York corporation and its location in Flushing, New York.

40. Upon information and belief, and as described in more detail in Section VII below, Share Info, among other things, is engaged in the importation into the United States and/or sale

after importation of wearable breast pumps, associated milk storage containers, and components thereof, including certain of the Accused Momcozy Products.

E. Shenzhen TPH Technology Co., Ltd

41. Proposed Respondent Shenzhen TPH Technology Co., Ltd. (“Shenzhen TPH”) is, on information and belief, a company organized and existing under the laws of China, having a principal place of business at Room 203, 2nd Floor, Building 29, Lianchuang Technology Park II, No. 21 Bulan Road, Xialilang Community, Longgang District, Shenzhen, China 518100. Upon information and belief, and as described in more detail in Section VII below, Shenzhen TPH, among other things, is engaged in the sale for importation into the United States and/or importation of wearable breast pumps, associated milk storage containers, and components thereof, including certain of the Accused Momcozy Products and the Accused Eufy Products. Upon further information and belief, and as described in more detail in Section VII below, Shenzhen TPH, through various agents (including co-Respondents), manufactures some or all these products in China, and then sells them for importation and/or imports the products depicted in **Exhibits 8-44** and **Exhibits 53-63**, detailed throughout this Complaint.

F. Guangdong Horigen Mother & Baby Products Co., Ltd

42. Proposed Respondent Horigen Mother & Baby Products Co., Ltd. (“Horigen Mother & Baby”) is, on information and belief, a company organized and existing under the laws of China, having a principal place of business at No. 18, Pingnan Industrial Zone, Mianbei Street, Chaoyang District, Shantou City, Guangdong, China 515100. Upon information and belief, and as described in more detail in Section VII below, Horigen Mother & Baby, among other things, is engaged in the sale for importation into the United States and/or importation of wearable breast pumps, associated milk storage containers, and components thereof, including certain of the Accused Momcozy Products. Upon further information and belief, Horigen Mother & Baby,

through various agents (including co-Respondents), manufactures these products in China, and then sells them for importation and/or imports the products depicted in **Exhibits 8-44**, detailed throughout this Complaint.

G. Anker Innovations Limited

43. Proposed Respondent Anker Innovations Limited (“Anker Innovations”) is, on information and belief, a company organized and existing under the laws of China, having a principal place of business at Unit / Room 56, 8th Floor, Admiralty Centre Tower 2, 18 Harcourt Road, Hong Kong 999077, with an additional address listed 400 108th Avenue NE #400, Bellevue, Washington 98004.

44. Upon information and belief, and as described in more detail in Section VII below, Anker Innovations, among other things, is engaged in the sale for importation into the United States and/or importation of wearable breast pumps, associated milk storage containers, and components thereof, including all the Accused Eufy Products. Upon information and belief, Anker Innovations, through various agents (including co-Respondents), manufactures these products in China, and then sells them for importation and/or facilitates their importation into the United States.

H. Fantasia Trading LLC

45. Proposed Respondent Fantasia Trading LLC (“Fantasia Trading”) is, on information and belief, a subsidiary of Respondent Anker Innovations and a Delaware company organized and existing under the laws of the United States, with a principal place of business at 5350 Ontario Mills Parkway, Suite 100, Ontario, California 91764. Upon information and belief, and as described in more detail in Section VII below, Fantasia Trading is, among other things, engaged in the importation into the United States and/or sale after importation of wearable breast pumps, associated milk storage containers, and components thereof, including all the Accused

Eufy Products. Attached as **Exhibit 67** are true and accurate screenshots taken from the website of the Delaware and California Secretaries of State showing Fantasia Trading is a Delaware company and its location in Ontario, California.

I. Power Mobile Life LLC

46. Proposed Respondent Power Mobile Life LLC (“Power Mobile Life”) is, on information and belief, a subsidiary of Respondent Anker Innovations and a Washington Limited Liability Company organized and existing under the laws of the United States, with a principal place of business at 10800 NE 8th Street, Suite 900, Bellevue, Washington 98004. Upon information and belief, and as described in more detail in Section VII below, Power Mobile Life is, among other things, engaged in the importation into the United States and/or sale after importation of wearable breast pumps, associated milk storage containers, and components thereof, including all the Accused Eufy Products. Attached as **Exhibit 70** are true and accurate screenshots taken from the website of the Washington Secretary of State showing Power Mobile Life is a Washington company and its location in Bellevue, Washington.

J. Guangdong Youmeng Electrical Technology Co., Ltd

47. Proposed Respondent Guangdong Youmeng Electrical Technology Co., Ltd. (“Youmeng”) is, on information and belief, a company organized and existing under the laws of China, having a principal place of business at One of Area A, 3rd Floor, Factory Building 2, No. 17 Keyuan 3rd Foad, Science & Technology Industrial Park, Shunde High-Tech Industrial Development Zone, Xiaohuangpu Community, Ronggui Street, Shunde District, Foshan City, Guangdong Province, China 528300. Upon information and belief, and as described in more detail in Section VII below, Youmeng, among other things, is engaged in the sale for importation into the United States and/or importation of wearable breast pumps, associated milk storage containers, and components thereof, including certain of the Accused Momcozy Products. Upon further

information and belief, Youmeng, through various agents (including co-Respondents), manufactures these products in China, and then sells them for importation and/or imports the products depicted in **Exhibits 8-44**, detailed throughout this Complaint.

K. TPH Technology Malaysia Sdn Bhd

48. Proposed Respondent TPH Technology Malaysia Sdn Bhd (“TPH Technology”) is, on information and belief, a company organized and existing under the laws of Malaysia, having a principal place of business at No. 2 (Block C) / 2C, Jalan Rawang Indah 1, Taman Industri Integrasi Rawang, 48000 Rawang, Selangor, Malaysia 48000. Upon information and belief, and as described in more detail in Section VII below, TPH Technology, among other things, is engaged in the sale for importation into the United States and/or importation of wearable breast pumps, associated milk storage containers, and components thereof, including certain of the Accused Eufy Products. Upon further information and belief, TPH Technology, through various agents (including co-Respondents), manufactures these products in China, and then sells them for importation and/or imports the products depicted in **Exhibits 53-63**, detailed throughout this Complaint.

L. Foshan Shunde Ruiteng Electrical Appliance Manufacturing Co. Ltd. (a.k.a., Joystar Electrical Appliances Manufacturing Co. Ltd)

49. Proposed Respondent Foshan Shunde Ruiteng Electrical Appliance Manufacturing Co., Ltd. (a.k.a., Joystar Electrical Appliances Manufacturing Co. Ltd.) (“Joystar Electrical”) is, on information and belief, a company organized and existing under the laws of China, having a principal place of business at No. 7 Xingye Road, Mould City (Tooling / Mould City Industrial Area), Shapu Village Committee, Jun’an Town, Shunde District, Foshan City, Guangdong, China 528329. Upon information and belief, and as described in more detail in Section VII below, Joystar Electrical, among other things, is engaged in the sale for importation into the United States and/or

importation of wearable breast pumps, associated milk storage containers, and components thereof, including certain of the Accused Momcozy Products. Upon further information and belief, Joystar Electrical, through various agents (including co-Respondents), manufactures these products in China, and then sells them for importation and/or imports the products depicted in **Exhibits 8-44**, detailed throughout this Complaint.

IV. THE ASSERTED PATENTS AND NON-TECHNICAL DESCRIPTION OF THE INVENTIONS¹⁰

A. Ownership of the Asserted Patents

50. Complainant Willow owns all right and title to the ‘380 Patent, the ‘292 Patent, and the ‘D344 Patent via assignments from the relevant inventors, as detailed below for each patent.

51. Complainant Willow Blossom owns all right and title to the ‘388 Patent and the ‘D993 Patent via assignments from Chiaro Technology Ltd., as detailed below for each patent.

52. Certified copies of the assignments for each of the Asserted Patents are attached as **Exhibits 2A, 2B, 2C, 2D, and 2E.**¹¹

B. U.S. Patent No. 11,660,380 (“the ‘380 Patent”)

53. The ‘380 Patent, entitled “Breast Pump System with Collection Container,” issued on May 30, 2023, naming John Chang, Joshua Makower, Brian Mason, Fred Co, Mathew Calmer, and Arash Sabet as the inventors. The ‘380 Patent issued from U.S. Patent Application No.

¹⁰ All non-technical descriptions of the inventions herein are presented to give a general background of those inventions. Such statements are not intended to be used, nor should be used, for purposes of patent claim interpretation. Willow presents these statements subject to, and without waiver of, its right to argue that certain claim terms should be construed in a particular way, as contemplated by claim interpretation jurisprudence and the relevant evidence.

¹¹ Pursuant to Commission Rule 210.12, Willow ordered certified copies of all patent related documents (patents, assignments, and prosecution histories) on May 13, 2026, and July 13, 2026, but has not received them as of the date of this submission. Willow will provide the requisite certified copies to the Commission as soon as it receives them.

18/082,776, filed December 16, 2022, and claims priority to U.S. Provisional Application No. 62/027,685, filed on July 22, 2014. The '380 Patent expires on July 21, 2035.

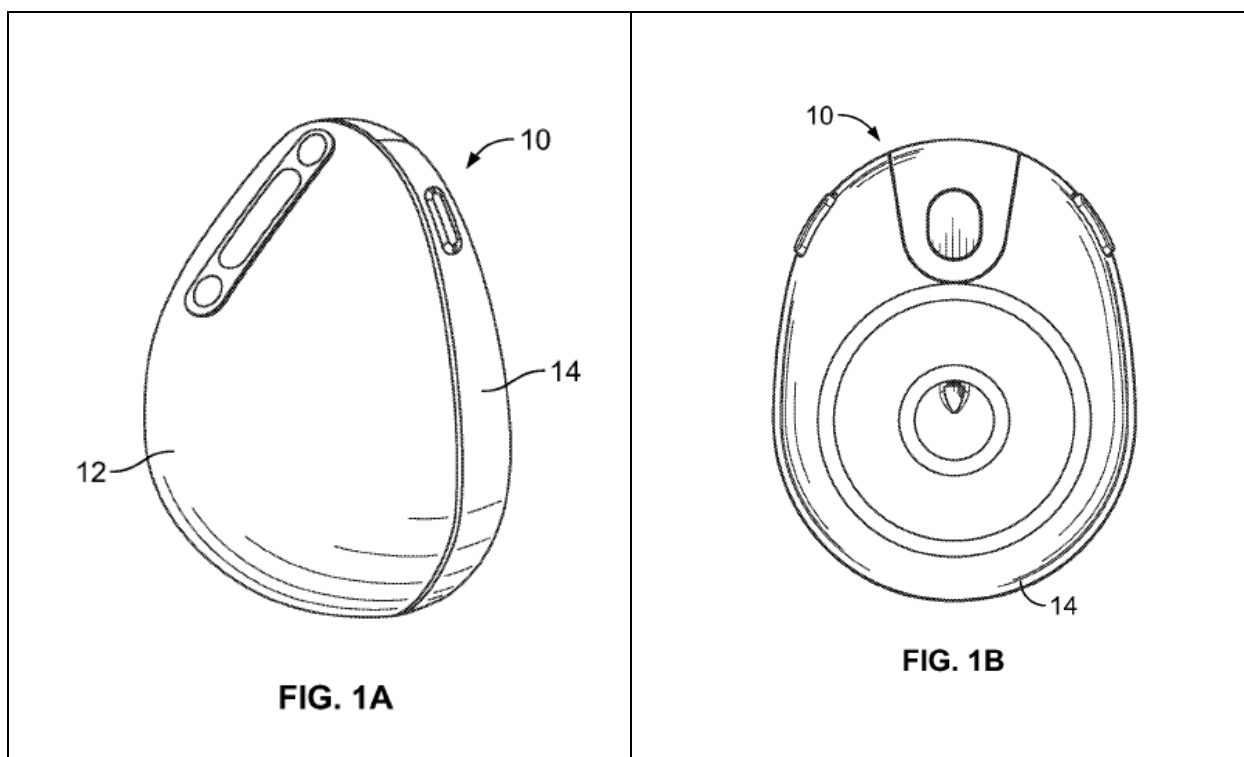
54. A certified copy of the '380 Patent is attached as **Exhibit 1A**.

55. A certified copy of the prosecution history of the '380 Patent is included in **Appendix A**.

56. The '380 Patent has 9 claims, one of which is an independent claim.

57. Willow is asserting at least independent claim 1, and dependent claims 6 - 9.

58. The following images are representative figures from the '380 Patent:



59. The following is a nontechnical description of the '380 Patent. The '380 Patent generally discloses an in-bra wearable, portable, and self-contained breast pump that utilizes an integrated pumping mechanism, collects milk in an integrated milk collection container that

surrounds the nipple receiving cavity, and is configured to fit inside a mother's bra, thereby providing a discrete, portable, and more natural breast pumping experience.

60. Prior art breast pumps suffered from a number of disadvantages and shortcomings, including but not limited to, large, cumbersome systems requiring external motors, tubes, multiple separate parts and collection bottles, and/or the need for external power sources or large battery packs. Similarly, traditional breast pump systems were not discrete with parts clearly visible under clothing and/or the exposure of the breast during a pumping session. These, and other limitations, inconveniently tethered the user to a pumping unit and/or made movement while pumping extremely cumbersome. The technology of the '380 Patent overcame these and other disadvantages.

C. U.S. Patent No. 12,370,292 (“the ‘292 Patent”)

61. The '292 Patent, entitled “Breast Pump Assembly,” issued on July 29, 2025, naming John Chang, Joshua Makower, Brian Mason, Fred Co, Mathew Calmer, and Arash Sabet as the inventors. The '292 Patent issued from U.S. Patent Application No. 18/367,649, filed September 13, 2023, and claims priority to U.S. Provisional Application No. 62/027,685, filed on July 22, 2014. The '292 Patent expires on July 21, 2035.

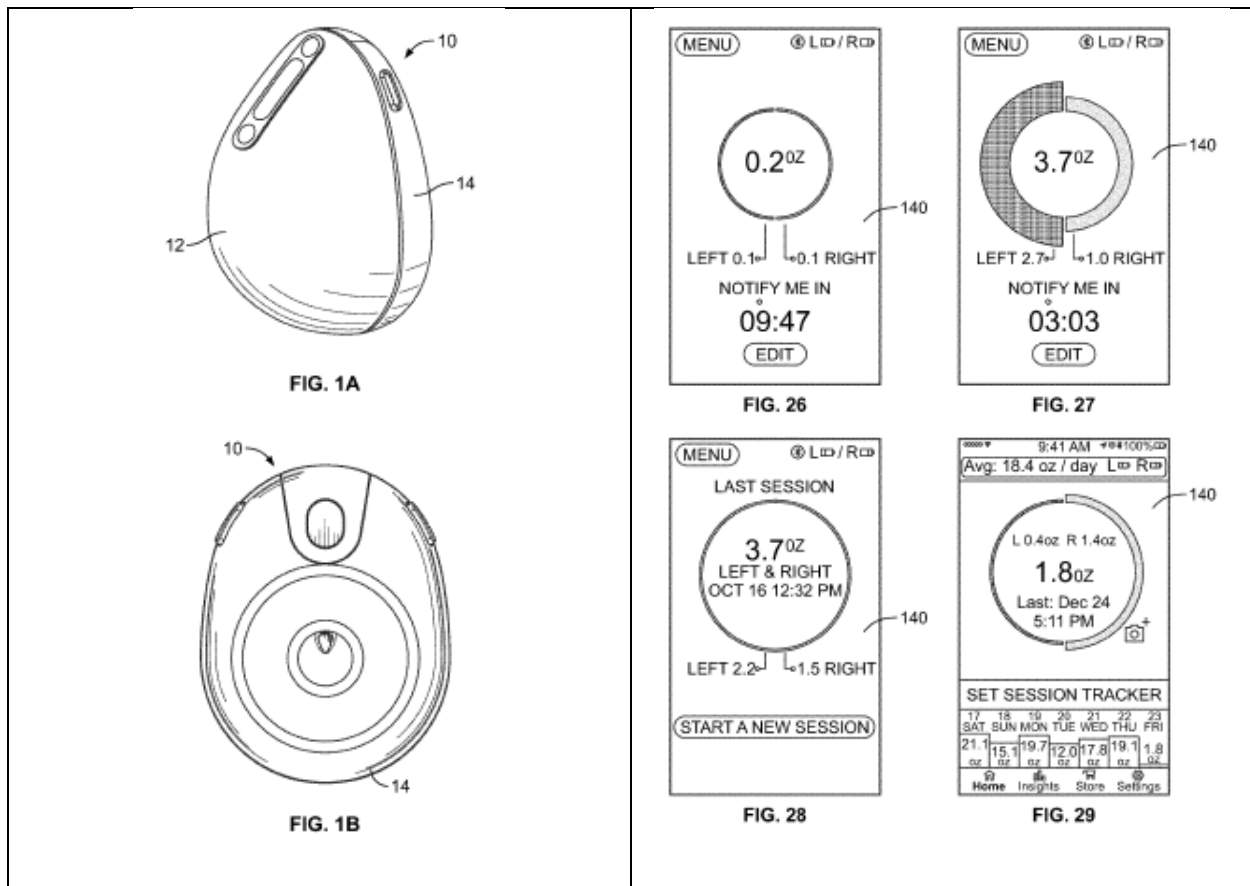
62. A certified copy of the '292 Patent is attached as **Exhibit 1B**.

63. A certified copy of the prosecution history of the '292 Patent is included in **Appendix B**.

64. The '292 Patent has 12 claims, one of which is an independent claim.

65. Willow is asserting at least independent claim 1, and dependent claims 2, 3, 5, 7, 8, 9, 10, 11, and 12.

66. The following images are representative figures from the '292 Patent:



67. The following is a nontechnical description of the '292 Patent. The '292 Patent generally discloses a fully in-bra wearable, portable, and self-contained breast pump that fits inside of a wearer's bra, generates pressure through a conduit to the nipple receiving cavity, and wirelessly connects to a smartphone or other external device for monitoring pumping metrics and controlling via remote adjustment.

68. Prior art breast pumps suffered from a number of disadvantages and shortcomings, including but not limited to, large, cumbersome systems requiring external motors, tubes, multiple separate parts and collection bottles, and/or the need for external power sources or large battery packs. Similarly, traditional breast pump systems were not discrete with parts clearly visible under clothing and/or the exposure of the breast during a pumping session. Additionally, traditional

breast pump systems either did not allow for integrated data tracking or had difficulty tracking milk production, pumping history, or other pumping metrics, and did not allow for remote monitoring, control, or wireless communication with a smartphone or other device. These, and other limitations, inconveniently tethered the user to a pumping unit, made movement while pumping extremely cumbersome, and did not allow for remote control, monitoring, or data tracking. The technology of the ‘292 Patent overcame these and other disadvantages.

D. U.S. Patent No. D 1,053,344 (“the ‘D344 Patent”)

69. The ‘D344 Patent is a design patent entitled “Container for a Breast Pump,” which issued on December 3, 2024, naming Jason Chamberlain, Simon Swain, and Marvin Patel as the inventors. The ‘D344 Patent issued from U.S. Patent Application No. 29/778,216, filed April 12, 2021. The ‘D344 Patent expires on December 3, 2039.

70. A certified copy of the ‘D344 Patent is attached as **Exhibit 1C**.

71. A certified copy of the prosecution history of the ‘D344 Patent is included in **Appendix C**.

72. The ‘D344 Patent claims the ornamental design for a container for a breast pump as shown and described in Figures 1-7 of the ‘D344 Patent.

73. Willow is asserting the single design claim of the ‘D344 Patent.

74. The following images are representative figures from the ‘D344 Patent:

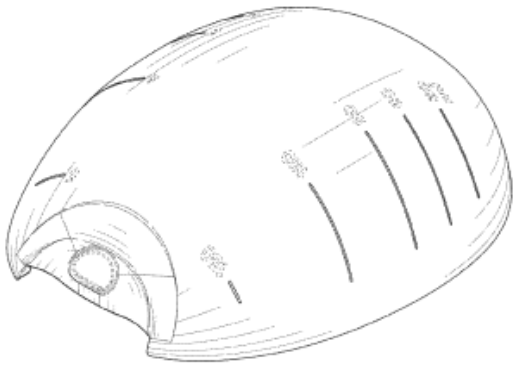


FIG. 1

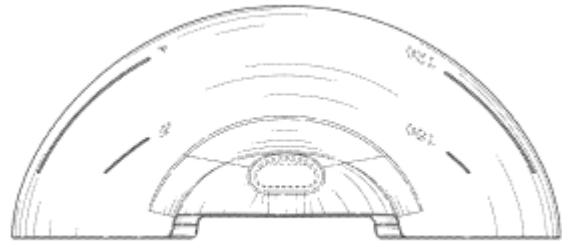


FIG. 2

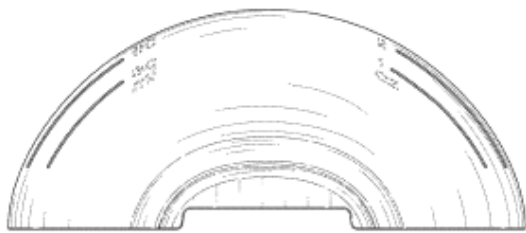


FIG. 3

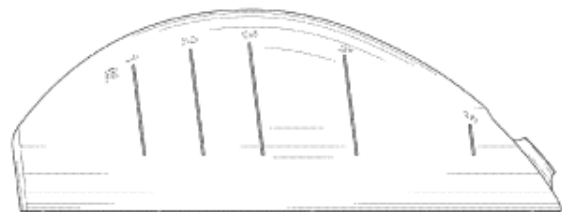


FIG. 4

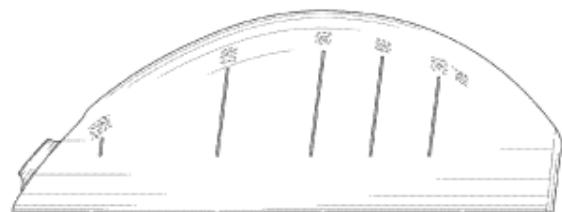
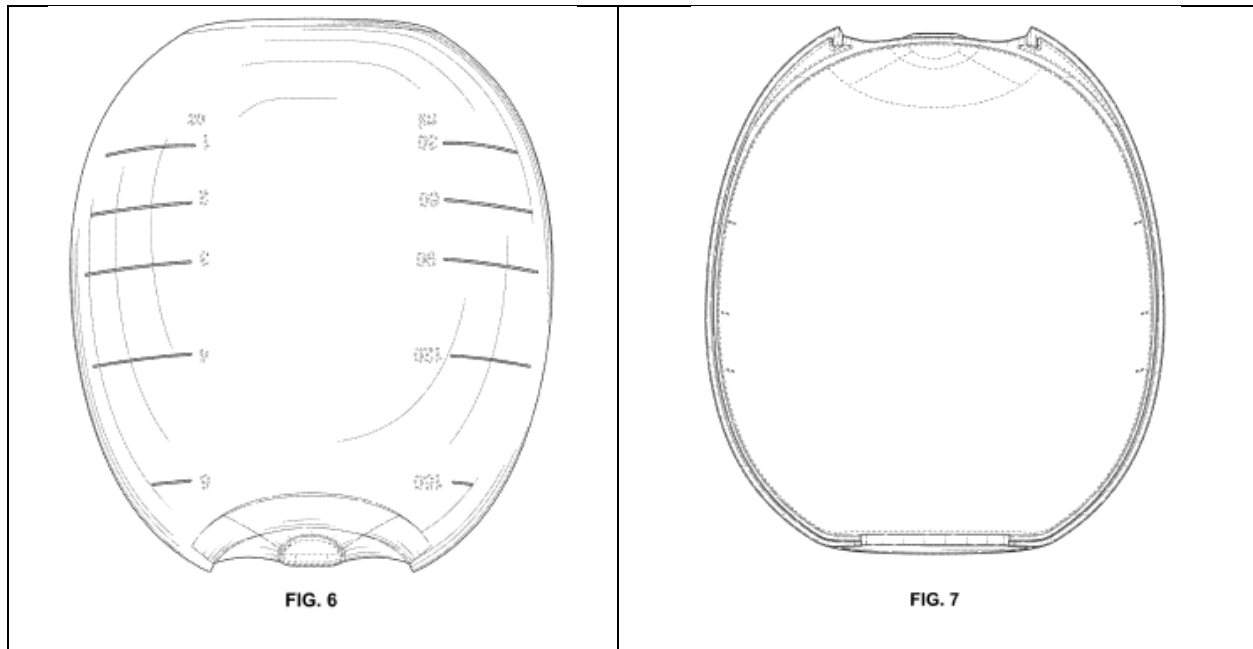


FIG. 5



75. The following is a nontechnical description of the ‘D344 Patent. The ‘D344 Patent is a design patent that claims the ornamental design for a container shell for a breast pump as shown in and described in Figures 1-7 therein. The D’344 generally discloses a breast pump milk collection container with a smooth, modern look, and an integrated and discreet ornamental appearance with natural transitions and contours intended to blend naturally into an in-bra wearable breast pump.

76. The ornamental design of prior art breast pumps and their associated milk collection containers suffered from a number of disadvantages and shortcomings, including but not limited to, large, clunky, bulky, and cumbersome systems and collection containers resembling traditional baby bottles, cups, or utilitarian collection vessels. The unique visual impression of the claimed ornamental design of the ‘D344 Patent overcame these and other disadvantages.

E. U.S. Patent No. 11,813,388 (“the ‘388 Patent”)

77. The ‘388 Patent, entitled “Breast Pump System,” issued on November 14, 2023, naming Johnathan O’Toole, Adam Rollo, and Andrew Carr as the inventors. The ‘388 Patent

issued from U.S. Patent Application No. 17/203,418, filed March 16, 2021, and claims priority to U.S. Patent Application No. 16/009,547, filed on June 15, 2018. The '388 Patent expires on June 15, 2038.

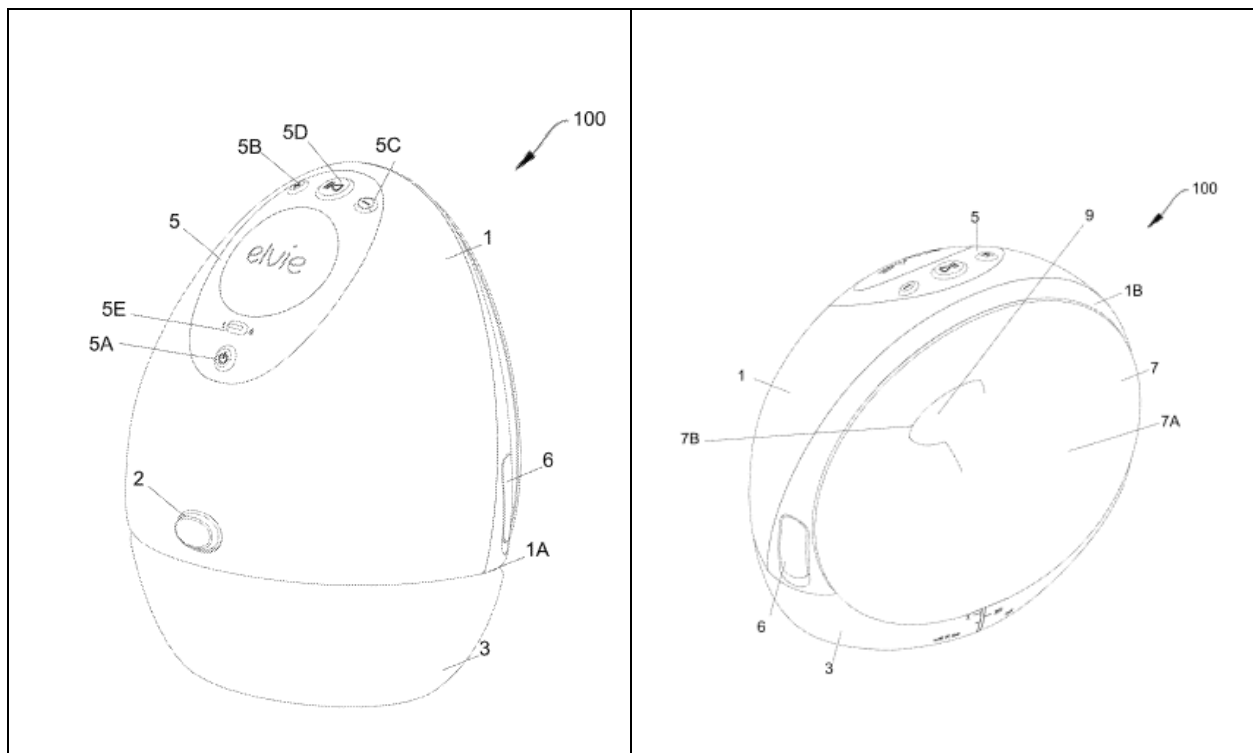
78. A certified copy of the '388 Patent is attached as **Exhibit 1D**.

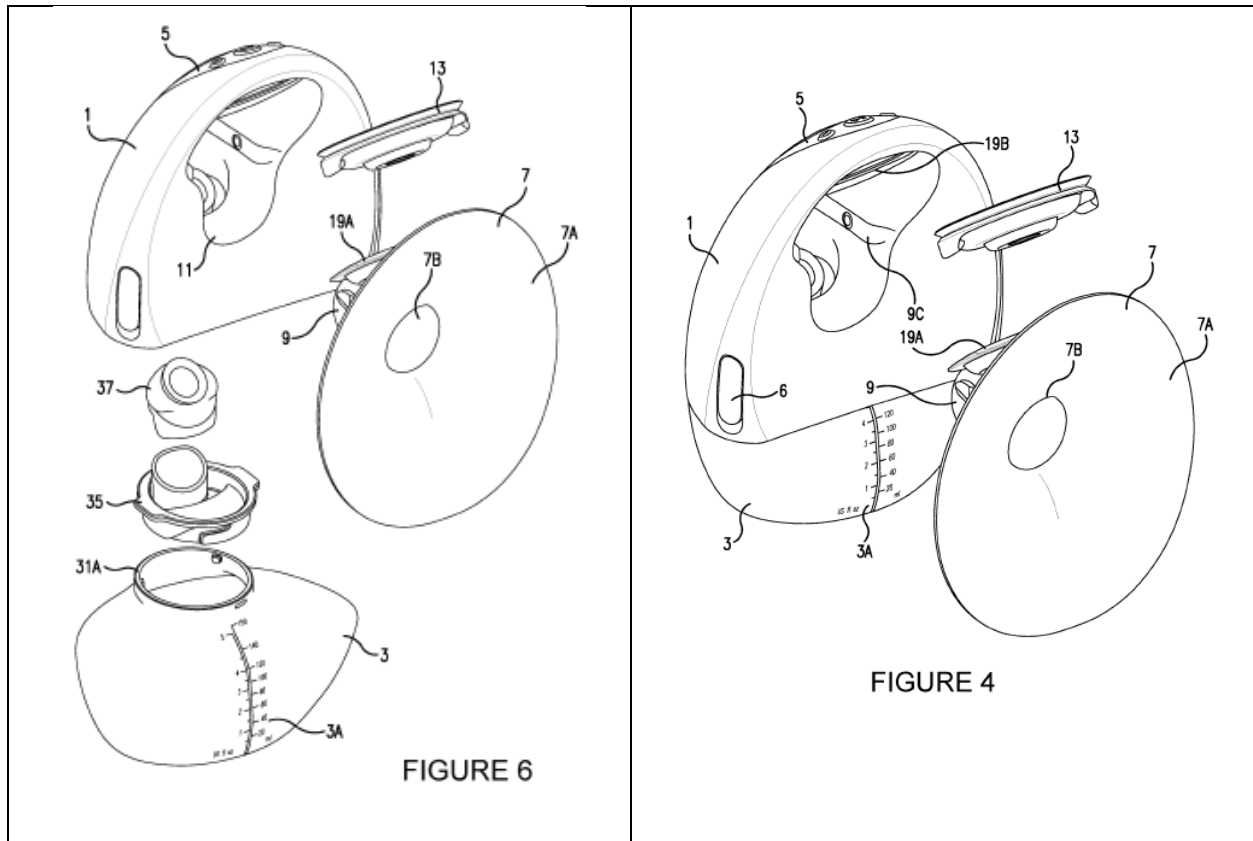
79. A certified copy of the prosecution history of the '388 Patent is included in **Appendix D**.

80. The '388 Patent has 30 claims, one of which is an independent claim.

81. Willow is asserting at least independent claim 1, and dependent claims 4-15, 17, 19-23, 27 and 30.

82. The following images are representative figures from the '388 Patent:





83. The following is a nontechnical description of the '388 Patent. The '388 Patent generally discloses a fully self-contained breast pump that collects milk via a simplified milk path and diaphragm-based suction transfer and provides a uniquely positioned and shaped milk container to allow for ease of use and placement.

84. Prior art breast pumps suffered from a number of disadvantages and shortcomings, including but not limited to, large, cumbersome systems requiring external motors sitting on a table or floor, external tubes running to the breast shield, multiple separate parts and external collection bottles, and/or the need for external power sources or large battery packs. These traditional pumps were bulky, noisy, difficult to use discreetly, and required mothers to effectively be tethered to external equipment. Similarly, traditional breast pump systems utilized complicated pumping arrangements, mechanically complex diaphragm designs, and inconveniently placed

and/or shaped milk collection containers. The technology of the ‘388 Patent overcame these and other disadvantages.

F. U.S. Patent No. D 1,031,993 (“the ‘D993 Patent”)

85. The ‘D993 Patent is a design patent entitled “Breast Pump Bottle,” which issued on June 18, 2024, naming Johnathan O’Toole, Adam Rollo, and Andrew Carr as the inventors. The ‘D993 Patent issued from U.S. Patent Application No. 29/874,181, filed April 14, 2023, and claims priority to U.S. Patent Application No. 29/672,048, filed December 3, 2018. The ‘D993 Patent expires on June 18, 2039.

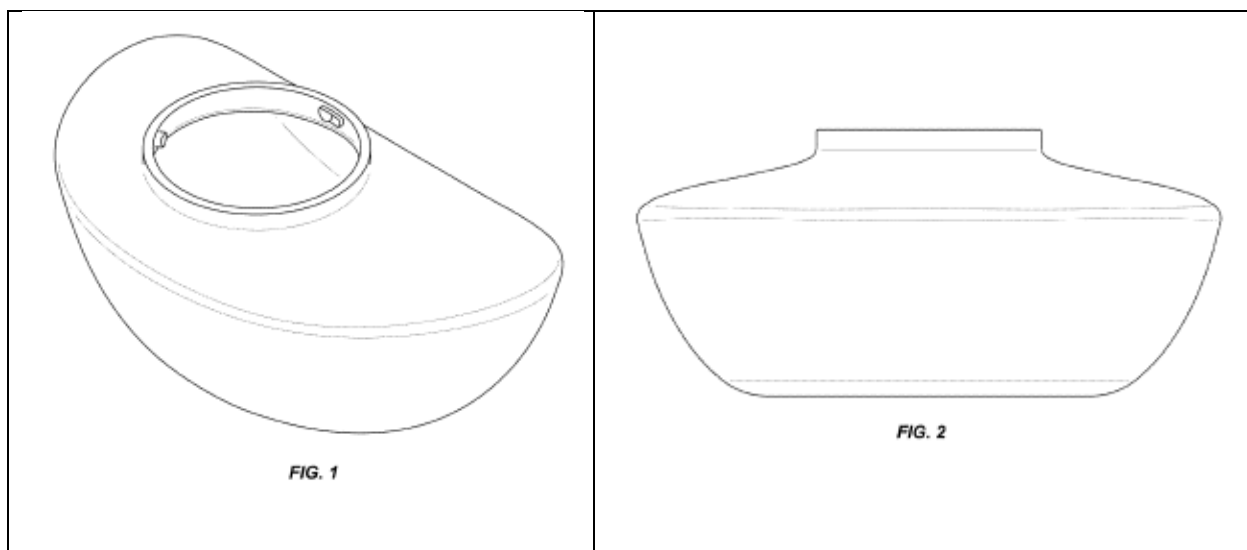
86. A certified copy of the ‘D993 Patent is attached as **Exhibit 1E**.

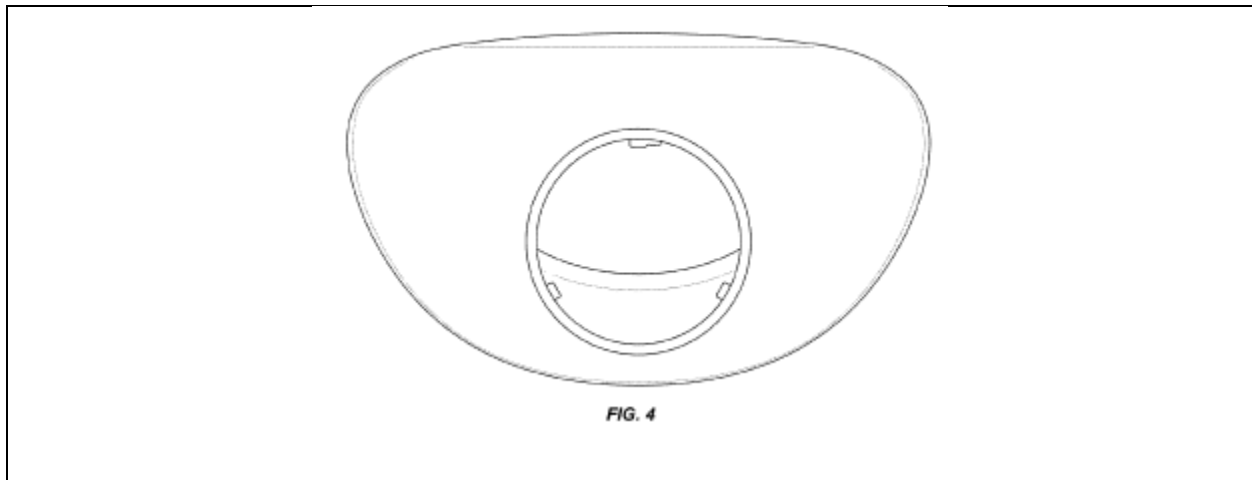
87. A certified copy of the prosecution history of the ‘D993 Patent is included in **Appendix E**.

88. The ‘D993 Patent claims the ornamental design for a breast pump bottle as shown and described in Figures 1-8 of the ‘D993 Patent.

89. Willow is asserting the single design claim of the ‘D993 Patent.

90. The following images are representative figures from the ‘D993 Patent:





91. The following is a nontechnical description of the ‘D993 Patent. The ‘D993 Patent is a design patent that claims the ornamental design for a breast pump bottle as shown in and described in Figures 1-8 therein. The ‘D993 generally discloses a breast pump bottle with a smooth, sleek, modern look, a rounded profile with curved sidewalls and a flat-bottomed, contoured shape that is more naturally tailored to fit within a discreet in-bra wearable breast pump system.

92. The ornamental design of prior art breast pump bottles and associated milk collection containers suffered from a number of disadvantages and shortcomings, including but not limited to, clunky, bulky, or more traditionally cylindrical milk collection bottles that are standalone containers as opposed to a modern, sleek design with a curved profile for more ergonomic use in an in-bra wearable breast pump. The unique visual impression of the claimed ornamental design of the ‘D993 Patent overcame these and other disadvantages.

G. Counterparts of the Asserted Patents

93. Pursuant to 19 C.F.R. § 210.12(a)(9)(v), attached as **Exhibit 86** and to the best of its knowledge, Willow provides a list of each foreign patent, foreign or domestic patent application (not already issued as a patent), and foreign or domestic patent application that has been denied,

abandoned or withdrawn that corresponds to the Asserted Patents, with an indication of the prosecution status of each patent application.

H. Licensees Under the Asserted Patents

94. Pursuant to 19 C.F.R. § 210.12(a)(9)(iii), a list of all entities that are licensees to one or more of the Asserted Patents is attached as **CONFIDENTIAL Exhibit 6**.

V. THE TECHNOLOGY AND PRODUCTS AT ISSUE

95. The Accused Products are substantially similar to the DI Products (albeit inferior), and there is direct competition in the marketplace between Willow and the Respondents.

96. Willow is committed to being on the leading edge of consumer product innovation in the United States and to delivering meaningful advantages over competitive products. As part of that commitment, Willow has spent millions of dollars designing, developing, and improving its wearable breast pump products, associated milk storage containers, and components thereof, including the DI Products.

97. The Asserted Patents are directed to in-bra wearable breast pumps and associated milk storage containers. Pursuant to 19 C.F.R. § 210.12(a)(12) and to facilitate the Commission's publication of a notice of institution pursuant to 19 C.F.R. § 210.10(b), based solely upon information and belief as of the date of this Complaint, Willow states that the Accused Products are wearable breast pumps, associated milk storage containers, and components thereof sold for importation, imported, and/or sold in the United States after importation by or on behalf of the Respondents. Exemplary components include, without limitation, separately sold milk collection containers and replacement parts.

VI. RESPONDENTS' UNLAWFUL AND UNFAIR ACTS

98. As discussed below, the Accused Products are wearable breast pumps, associated milk storage containers, and components thereof that infringe the Asserted Patents. The Accused

Products are manufactured abroad, sold for importation into the United States, imported into the United States, and/or sold within the United States after importation—all by or on behalf of one or more Respondents. As discussed below, there are multiple Respondents involved in the manufacture, sale for importation, importation, use, offer to sell, and/or sale for each of the Accused Products. Based solely upon information and belief as of the date of this Complaint, and without limiting the scope of the investigation, scope of discovery, or scope of eventual ITC remedies, Willow identifies the individual Respondents that it presently believes are associated with each specific Accused Product. Infringement details regarding the representative Accused Products discussed below can be found in **Exhibits 5A through 5P**.

99. On information and belief, and as demonstrated in the chart below, at least the following Respondents are responsible for or involved in the manufacture abroad, sale for importation into the United States, importation into the United States, and/or sale within the United States after importation of Accused Products that infringe at least independent claim 1 and dependent claims 6, 7, 8 and 9 of the ‘380 Patent.

INFRINGEMENT OF THE ‘380 PATENT		
ASSERTED CLAIMS: <u>1</u>, 6, 7, 8, 9		
BRAND	PRODUCT NAME	RESPONDENTS
Momcozy	Air 1	Shenzhen Root Hong Kong Lute Root Technology
Momcozy	Wellness 1	Shenzhen Root Hong Kong Lute Root Technology
Momcozy	M6	Shenzhen Root Hong Kong Lute Root Technology Shenzhen TPH

Momcozy	M5 Smart	Shenzhen Root Hong Kong Lute Root Technology Horigen Mother & Baby Youmeng Joystar Electrical Shenzhen TPH
Momcozy	S12 Pro	Shenzhen Root Hong Kong Lute Root Technology Shenzhen TPH Horigen Mother & Baby Youmeng Joystar Electrical
Momcozy	S9 Pro	Shenzhen Root Hong Kong Lute Root Technology Shenzhen TPH Horigen Mother & Baby Youmeng Joystar Electrical
Eufy	S1 Pro	Anker Innovations Shenzhen TPH Fantasia Trading Power Mobile TPH Technology
Eufy	S2 Pro	Anker Innovations Shenzhen TPH Fantasia Trading Power Mobile TPH Technology

100. Exemplary claim charts detailing infringement of independent claim 1 of the ‘380 Patent by the Accused Products and Respondents mentioned above are attached as **Exhibit 5A (Momcozy / Air 1)**, **Exhibit 5B (Momcozy / Wellness 1)**, **Exhibit 5C (Momcozy / M6)**, **Exhibit**

5D (Momcozy / M5 Smart)¹², Exhibit 5E (Momcozy / S12 Pro)¹³, Exhibit 5F (Momcozy / S9 Pro)¹⁴, Exhibit 5G (Eufy / S1 Pro)¹⁵, and Exhibit 5H (Eufy / S2 Pro)¹⁶.

101. On information and belief, and as demonstrated in the chart below, at least the following Respondents are responsible for or involved in the manufacture abroad, sale for importation into the United States, importation into the United States, and/or sale within the United States after importation of the Accused Products that infringe at least independent claim 1, and dependent claims 2, 3, 5, 6, 7, 8, 9, 10, 11, and 12 of the ‘292 Patent.

INFRINGEMENT OF THE ‘292 PATENT		
ASSERTED CLAIMS: <u>1, 2, 3, 5, 7, 8, 9, 10, 11, 12</u>		
BRAND	PRODUCT NAME	RESPONDENTS
Momcozy	M9	Shenzhen Root Hong Kong Lute Root Technology Share Info Shenzhen TPH

¹² As discussed above in FN 2, given the structural similarities between the accused Momcozy M5, M5 Lite, and M5 Smart products, Willow has charted the Momcozy M5 Smart product as representative of all M5 branded products.

¹³ As discussed above in FN 6, given the structural similarities between the accused Momcozy S12, S12 Pro, and S12 Pro Quick, Willow charted the Momcozy S12 Pro product as representative of all S12 branded products.

¹⁴ As discussed above in FN 7, given the structural similarities between the accused Momcozy S9 and S9 Pro products, Willow charted the Momcozy S9 Pro product as representative of all S9 branded products.

¹⁵ As discussed above in FN 8, given the structural similarities between the accused Eufy S1, S1 Pro, and E20 products, Willow charted the Eufy S1 Pro as representative of all S1 branded products and the E20 products.

¹⁶ As discussed above in FN 9, given the structural similarities between the accused Eufy S2 and S2 Pro products, Willow charted the Eufy S2 Pro as representative of all S2 branded products.

102. Exemplary claim charts detailing infringement of independent claim 1 of the ‘292 Patent by the Accused Product and Respondents mentioned above are attached as **Exhibit 5I (Momcozy / M9)**.

103. On information and belief, and as demonstrated in the chart below, at least the following Respondents are responsible for or involved in the manufacture abroad, sale for importation into the United States, importation into the United States, and/or sale within the United States after importation of Accused Products that infringe the single design claim of the ‘D344 Patent.

INFRINGEMENT OF THE ‘D344 PATENT		
ASSERTED SINGLE DESIGN CLAIM		
BRAND	PRODUCT NAME	RESPONDENTS
Momcozy	Air 1	Shenzhen Root Hong Kong Lute Root Technology
Momcozy	Wellness 1	Shenzhen Root Hong Kong Lute Root Technology
Eufy	S2 Pro	Anker Innovations Shenzhen TPH Fantasia Trading Power Mobile TPH Technology

104. Exemplary claim charts detailing infringement of the single design claim of the ‘D344 Patent by the Accused Products and Respondents mentioned above are attached as **Exhibit**

5J (Momcozy / Air 1)¹⁷, Exhibit 5K (Momcozy / Wellness 1)¹⁸, and Exhibit 5L (Eufy / S2 Pro)¹⁹.

105. On information and belief, and as demonstrated in the chart below, at least the following Respondents are responsible for or involved in the manufacture abroad, sale for importation into the United States, importation into the United States, and/or sale within the United States after importation of Accused Products that infringe at least independent claim 1, and dependent claims 4-15, 17, 19-23, 27, and 30 of the ‘388 Patent.

INFRINGEMENT OF THE ‘388 PATENT		
ASSERTED CLAIMS: <u>1</u> , 4-15, 17, 19-23, 27, 30		
BRAND	PRODUCT NAME	RESPONDENTS
Momcozy	M9	Shenzhen Root Hong Kong Lute Root Technology Share Info Shenzhen TPH
Momcozy	M6	Shenzhen Root Hong Kong Lute Root Technology Shenzhen TPH

¹⁷ As discussed above in FN 5, given the fact that the accused Air 1 product itself contains the same milk collector as is sold separately as a replacement part, Willow charted the Air 1 product as representative of all Air 1 labeled products and replacement milk collectors.

¹⁸ As discussed above in FN 4, given the fact that the accused Wellness 1 product itself contains the same milk collector as is sold separately as a replacement part, Willow charted the Wellness 1 product as representative of all Wellness 1 labeled products and replacement milk collectors.

¹⁹ As discussed above in FN 9, given the structural similarities between the accused Eufy S2 and S2 Pro products and the fact that both products include the same container as is sold separately as a replacement part, Willow charted the Eufy S2 Pro as representative of all S2 branded products and replacement milk containers.

Momcozy	Wellness 1	Shenzhen Root Hong Kong Lute Root Technology
---------	------------	--

106. Exemplary claim charts detailing infringement of independent claim 1 of the ‘388 Patent by the Accused Products and Respondents mentioned above are attached as **Exhibit 5M (Momcozy / M9), Exhibit 5N (Momcozy / M6), and Exhibit 5O (Momcozy / Wellness 1)**.

107. On information and belief, and as demonstrated in the chart below, at least the following Respondents are responsible for or involved in the manufacture abroad, sale for importation into the United States, importation into the United States, and/or sale within the United States after importation of the Accused Products that infringe the single design claim of the ‘D993 Patent.

INFRINGEMENT OF THE ‘D993 PATENT		
ASSERTED SINGLE DESIGN CLAIM		
BRAND	PRODUCT NAME	RESPONDENTS
Momcozy	M9	Shenzhen Root Hong Kong Lute Root Technology Share Info Shenzhen TPH

108. Exemplary claim charts detailing infringement of the single design claim of the ‘D993 Patent by the Accused Products and Respondents mentioned above are attached as **Exhibit 5P (Momcozy / M9)²⁰**.

²⁰ As discussed above in FN 3, given the fact that the accused M9 product itself contains the same milk collector as is sold separately as a replacement part, Willow charted the M9 product as representative of all M9 labeled products and replacement milk collectors.

VII. SPECIFIC INSTANCES OF UNFAIR IMPORTATION AND SALE

109. As mentioned above, given the substantial challenges in identifying and tracking Respondents' shipment and importation of the Accused Products, Willow believes this case is tailor-made for Section 337 and the remedies afforded by the ITC.

110. Indeed, while Willow has conducted a thorough investigation (across various platforms) to determine the appropriate Respondents to specifically name (as detailed below), it is abundantly clear that Respondents are importing the Accused Products through a complex and opaque web (perhaps by design) of supply chains involving affiliated entities, distributors, resellers, customs brokers, contract manufacturers, and third-party logistics providers that often operate under multiple names and/or abbreviated titles. As a practical matter, this obscures the identity of the shipper or importer, the exact nature of the imported products, and the volume and timing of importation.

111. Generally speaking, Willow relied upon a combination of the following categories of information to identify the appropriate parties involved in the importation, sale for importation, and/or sale in the United States after importation of the various Accused Products.

112. First, Willow relied upon direct evidence of the manufacturing and/or importer information listed on the products, labels, and/or packaging of the Accused Products themselves, and entity and/or contact information listed on the websites where the Accused Products are being offered for sale and/or were purchased in the United States.

113. Second, Willow also relied upon publicly available information and/or publicly available statements and admissions made by the Respondents that were pulled from sources such as the Trademark Electronic Search System (TESS), federal litigation records available via PACER, and Establishment Registrations and/or 510(k) Premarket Notifications available on the website of the United States Food and Drug Administration ("FDA").

114. Third, Willow also relied upon true and accurate printouts retrieved from Descartes Datamyne and Import Genius demonstrating importation of wearable breast pump products and associated componentry under subheadings 8413 and 3926 of the Harmonized Tariff Schedule of the United States (“HTSUS”) (detailed in Section VIII, below), and identifying specific Respondents as either the shipper of such products or the consignee of such products in the United States, and the dates of such activities.

A. Shenzhen Root Innovation Technology Co., Ltd

115. Upon information and belief, Shenzhen Root, among other things, is engaged in the sale for importation into the United States and/or importation of certain wearable breast pumps, associated milk storage containers, and components thereof, including all the Accused Momcozy Products. Upon information and belief, Shenzhen Root, through various agents (including co-Respondents), manufactures these products in China, and then sells them for importation and/or facilitates their importation into the United States.

116. The packaging for the Accused Momcozy Products identifies Shenzhen Root as the “manufacturer” of the products and/or the company that the products are “manufactured for.” The packaging also lists the following address in China: 2F2-201, Shenzhou Computer Building, Marie Curie Avenue, Vanke City Community, Bantian Street, Longgang District, Shenzhen, China 518129.

117. Attached as **Exhibit 8** are true and accurate photographs of an Accused Momcozy M5 wearable breast pump, including the labels affixed on the product packaging identifying Shenzhen Root as the manufacturer. The product was purchased in the United States through the website Amazon.com on February 24, 2026. These photos indicate that the product was made in China.

118. Attached as **Exhibit 9** are true and accurate copies of the receipt from Amazon.com for the purchase of the Accused Momcozy M5 wearable breast pump shown above.

119. Attached as **Exhibit 10** is a true and accurate copy of the Instruction Manual that was included in the packaging for the Accused Momcozy M5 wearable breast pump shown above.

120. Attached as **Exhibit 11** are true and accurate screenshots taken from Momcozy's website (www.momcozy.com) on July 20, 2026, showing the Accused Momcozy M5 wearable breast pump available for purchase online.

121. Attached as **Exhibit 12** are true and accurate photographs of an Accused Momcozy M6 wearable breast pump, including the labels affixed on the product packaging identifying Shenzhen Root as the manufacturer. This product was purchased in the United States through the website Amazon.com on June 22, 2026. These photos indicate that the product was made in China.

122. Attached as **Exhibit 13** are true and accurate copies of the receipt from Amazon.com for the purchase of the Accused Momcozy M6 wearable breast pump shown in Exhibit 12.

123. Attached as **Exhibit 14** is a true and accurate copy of the Instruction Manual that was included in the packaging for the Accused Momcozy M6 wearable breast pump shown above.

124. Attached as **Exhibit 15** are true and accurate screenshots taken from Momcozy's website (www.momcozy.com) on July 20, 2026, showing the Accused Momcozy M6 wearable breast pump available for purchase online.

125. Attached as **Exhibit 16** are true and accurate photographs of an Accused Momcozy M9 wearable breast pump, including the labels affixed on the product packaging identifying Shenzhen Root as the manufacturer. This product was purchased in the United States through the

website Walmart.com on March 3, 2026. These photos indicate that the product was made in China.

126. Attached as **Exhibit 17** are true and accurate copies of the receipt from Walmart.com for the purchase of the Accused Momcozy M9 wearable breast pump shown above.

127. Attached as **Exhibit 18** is a true and accurate copy of the Instruction Manual that was included in the packaging for the Accused Momcozy M9 wearable breast pump shown above.

128. Attached as **Exhibit 19** are true and accurate screenshots taken from Momcozy's website (www.momcozy.com) on July 20, 2026, showing the Accused Momcozy M9 wearable breast pump available for purchase online.

129. Attached as **Exhibit 20** are true and accurate photographs of an Accused Momcozy Wellness 1 wearable breast pump, including the labels affixed on the product packaging identifying Shenzhen Root as the manufacturer. This product was purchased in the United States through the website Momcozy.com on May 18, 2026. These photos indicate that the product was made in China.

130. Attached as **Exhibit 21** are true and accurate copies of the receipt from Momcozy.com for the purchase of the Accused Momcozy Wellness 1 wearable breast pump shown above.

131. Attached as **Exhibit 22** is a true and accurate copy of the Instruction Manual that was included in the packaging for the Accused Momcozy Wellness 1 wearable breast pump shown above.

132. Attached as **Exhibit 23** are true and accurate screenshots taken from Momcozy's website (www.momcozy.com) on July 20, 2026, showing the Accused Momcozy Wellness 1 wearable breast pump available for purchase online.

133. Attached as **Exhibit 24** are true and accurate photographs of an Accused Momcozy Air 1 wearable breast pump, including the labels affixed on the product packaging identifying Shenzhen Root as the manufacturer. This product was purchased in the United States through the website Amazon.com on February 24, 2026. These photos indicate that the product was made in China.

134. Attached as **Exhibit 25** are true and accurate copies of the receipt from Amazon.com for the purchase of the Accused Momcozy Air 1 wearable breast pump shown above.

135. Attached as **Exhibit 26** is a true and accurate copy of the Instruction Manual that was included in the packaging for the Accused Momcozy Air 1 wearable breast pump shown above.

136. Attached as **Exhibit 27** are true and accurate screenshots taken from Momcozy's website (www.momcozy.com) on July 20, 2026, showing the Accused Momcozy Air 1 wearable breast pump available for purchase online.

137. Attached as **Exhibit 28** are true and accurate photographs of an Accused Momcozy S12 wearable breast pump, including the labels affixed on the product packaging identifying Shenzhen Root as the manufacturer. This product was purchased in the United States through the website Walmart.com on March 3, 2026. These photos indicate that the product was made in China.

138. Attached as **Exhibit 29** are true and accurate copies of the receipt from Walmart.com for the purchase of the Accused Momcozy S12 wearable breast pump shown above.

139. Attached as **Exhibit 30** is a true and accurate copy of the Instruction Manual that was included in the packaging for the Accused Momcozy S12 wearable breast pump shown above.

140. Attached as **Exhibit 31** are true and accurate screenshots taken from Momcozy's website (www.momcozy.com) on July 20, 2026, showing the Accused Momcozy S12 wearable breast pump available for purchase online.

141. Attached as **Exhibit 32** are true and accurate photographs of an Accused Momcozy S9 Pro wearable breast pump, including the labels affixed on the product packaging identifying Shenzhen Root as the manufacturer. This product was purchased in the United States through the website Amazon.com on July 14, 2026. These photos indicate that the product was made in China.

142. Attached as **Exhibit 33** are true and accurate copies of the receipt from Amazon.com for the purchase of the Accused Momcozy S9 Pro wearable breast pump shown above.

143. Attached as **Exhibit 34** is a true and accurate copy of the Instruction Manual that was included in the packaging for the Accused Momcozy S9 Pro wearable breast pump shown above.

144. Attached as **Exhibit 35** are true and accurate screenshots taken from Momcozy's website (www.momcozy.com) on July 20, 2026, showing the Accused Momcozy S9 Pro wearable breast pump available for purchase online.

145. Attached as **Exhibit 36** are true and accurate photographs of Accused Momcozy Air 1 wearable breast pump replacement parts, and specifically the "milk collector," including the labels affixed on the product packaging, which was purchased in the United States through the website Amazon.com on July 23, 2026. These photos indicate that the product was made in China.

146. Attached as **Exhibit 37** are true and accurate copies of the receipt from Amazon.com for the purchase of the Accused Momcozy Air 1 wearable breast pump replacement parts, and specifically the "milk collector," shown above.

147. Attached as **Exhibit 38** are true and accurate screenshots taken from Momcozy's website (www.momcozy.com) on July 21, 2026, showing the Accused Momcozy Air 1 wearable breast pump replacement parts, and specifically the "milk collector," available for purchase online.

148. Attached as **Exhibit 41** are true and accurate screenshots taken from Momcozy's website (www.momcozy.com) taken on July 21, 2026, showing the Accused Momcozy Wellness 1 wearable breast pump replacement parts, and specifically the "milk collector," available for purchase online in the United States.

149. Attached as **Exhibit 42** are true and accurate photographs of Accused Momcozy M9 wearable breast pump replacement parts, and specifically the "overall" replacement parts and the "milk collector & storage lid," including the labels affixed on the product packaging, which was purchased in the United States through the website Amazon.com on July 23, 2026. These photos indicate that the product was made in China.

150. Attached as **Exhibit 43** are true and accurate copies of the receipt from Amazon.com for the purchase of the Accused Momcozy M9 wearable breast pump replacement parts, and specifically the "overall" replacement parts and the "milk collector & storage lid," shown above.

151. Attached as **Exhibit 44** are true and accurate screenshots taken from Momcozy's website (www.momcozy.com) on July 21, 2026, showing the Accused Momcozy M9 wearable breast pump replacement parts, and specifically the "overall" replacement parts and the "milk collector & storage lid," available for purchase online.

152. Shenzhen Root, among other defendants, was named in a United States litigation filed in 2023 and still pending that involved allegations of patent infringement pertaining to wearable breast pump products. In that case, Shenzhen Root referred to itself (along with other

entities) as “Momcozy,” and further admitted that Respondent Hong Kong Lute is a subsidiary of Shenzhen Root. Additionally, Shenzhen Root further admitted that it sells at least the S12 Pro, S9 Pro and M5 Accused Momcozy Products in the United States. Attached as **Exhibit 50** is a true and accurate copy of the Answer filed on May 15, 2024, in the United States District Court for the Western District of Washington (Case No. 23-631-KKE, Dkt. 117 at pp. 1-2, 4-5, 10-11.)

153. Attached as **Exhibit 83** are true and accurate screenshots taken from the FDA’s website showing an Establishment Registration and a 510(k) Premarket Notification identifying Shenzhen Root as the manufacturer of various of the accused Momcozy branded wearable breast pumps detailed above.

B. Hong Kong Lute Technology Co., Ltd

154. Upon information and belief, Hong Kong Lute, among other things, is engaged in the sale for importation into the United States and/or importation of wearable breast pumps, associated milk storage containers, and components thereof, including all the Accused Momcozy Products. Upon information and belief, Hong Kong Lute through various agents (including co-Respondents), manufactures these products in China, and then sells them for importation and/or facilitates their importation.

155. Attached as **Exhibit 47** are true and accurate screenshots taken from Momcozy’s website on July 21, 2026, listing Hong Kong Lute on the Momcozy website, and providing its address (Room 803B, 8/F, West Coast International Building, 290-296 Un Chau Street, Cheung Sha Wan, Kowloon, Hong Kong 999077). This information is provided on the same page that advertises and offers for sale wearable breast pump products, associated milk storage containers, and components thereof, including all the Accused Momcozy Products.

156. As detailed above in **Exhibit 20**, on May 18, 2026, the Accused Momcozy Wellness 1 wearable breast pump (that also identifies Respondent Shenzhen Root as the

manufacturer on the product label) was purchased in the United States through the Momcozy.com website. The receipt for that purchase is attached as **Exhibit 21**.

157. Additionally, as detailed above in **Exhibits 8 through 44**, certain Accused Momcozy Products, and at a minimum the Air 1, M5, M6, and S9 products, were purchased online in the United States on various dates through the website Amazon.com. The labeling on those products all indicates the products are made in China and the Amazon.com listings for those products identifies “Momcozy” as the manufacturer.

158. Hong Kong Lute, among other defendants, was named in a United States litigation filed in 2023 and still pending that involved allegations of patent infringement pertaining to wearable breast pump products. In that case, Hong Kong Lute referred to itself (along with other entities) as “Momcozy,” and further admitted that Hong Kong Lute is a subsidiary of Respondent Shenzhen Root. Additionally, Hong Kong Lute also admitted that it is an entity responsible for selling the S9, S9 Pro, S12, S12 Pro, and M5 Accused Momcozy Products in the United States. Attached as **Exhibit 50** is a true and accurate copy of the Answer filed on May 15, 2024, in the United States District Court for the Western District of Washington (Case No. 23-631-KKE, Dkt. 117 at pp. 1-2, 4-5, 11-13.)

159. Additionally, attached as **Exhibit 84** are true and accurate screenshots taken from the FDA’s website showing an Establishment Registration that identifies Hong Kong Lute as the “foreign exporter,” “foreign private label distributor,” and/or “repackager / relabeler” of numerous accused Momcozy branded wearable breast pumps at issue in this matter.

C. Root Technology, Ltd

160. Upon information and belief, Root Technology is, among other things, engaged in the importation into the United States and/or sale after importation of wearable breast pump products, associated milk storage containers, and components thereof, including all the Accused

Momcozy Products. Attached as **Exhibit 48** are true and accurate screenshots taken from the website of the California Secretary of State showing Root Technology is a California company and its location in Beverly Hills, California.

161. Like Respondent Hong Kong Lute above, Root Technology is also identified at the bottom of the Momcozy website homepage. This information is provided on the same website that advertises and offers for sale wearable breast pump products, associated milk storage containers, and components thereof, including all the Accused Momcozy Products. *See Exhibit 47*, which are true and accurate screenshots taken from Momcozy's website on July 21, 2026, showing this information.

162. As detailed above in **Exhibit 20**, on May 18, 2026, the Accused Momcozy Wellness 1 wearable breast pump (that also identifies Respondent Shenzhen Root as the manufacturer on the product label) was purchased in the United States through the Momcozy.com website. The receipt for that purchase is attached as **Exhibit 21**.

163. As detailed above in **Exhibit 24**, the Accused Momcozy Air 1 wearable breast pump (that also identifies Respondent Shenzhen Root as the manufacturer) was purchased in the United States through the website Amazon.com on February 24, 2026. The receipt for that purchase is attached as **Exhibit 25**. The packaging label on that product identifies Root Technology as the US Importer and lists the same Denver, Colorado mailing address mentioned above and in **Exhibit 48**.

D. Share Info, Inc

164. Upon information and belief, Share Info, among other things, is engaged in the importation into the United States and/or sale after importation of wearable breast pumps, associated milk storage containers, and components thereof, including certain of the Accused Momcozy Products.

165. As detailed above in the photographs contained in **Exhibit 16**, the Accused Momcozy M9 wearable breast pump was purchased in the United States through the website Walmart.com on March 3, 2026. The receipt for that purchase is attached as **Exhibit 17**. The labels affixed on the product packaging for the Accused Momcozy M9 Product identify Respondent Shenzhen Root as the manufacturer and Share Info as the “US Importer” for that product. These photos indicate that the product was made in China.

E. Shenzhen TPH Technology Co., Ltd

166. Upon information and belief, Shenzhen TPH, among other things, is engaged in the sale for importation into the United States and/or importation of certain wearable breast pump products, associated milk storage containers, and components thereof, including certain of the Accused Momcozy Products and the Accused Eufy Products. Upon further information and belief, Shenzhen TPH, through various agents (including co-Respondents), manufactures some or all these products in China, and then sells them for importation and/or imports the products depicted in **Exhibits 8-44**, and **Exhibits 53-63**, detailed throughout this Complaint.

167. Shenzhen TPH, among other defendants, was named in a United States litigation filed in 2023 and still pending that involved allegations of patent infringement pertaining to wearable breast pump products. In that case, Shenzhen TPH referred to itself (along with other entities) as “Momcozy,” and admitted in an Answer that it is responsible for the manufacture of at least the S9, S12, M6, M9, and M5 Accused Momcozy Products at issue in this matter. Attached as **Exhibit 50** is a true and accurate copy of the Answer filed on May 15, 2024, in the United States District Court for the Western District of Washington (Case No. 23-631-KKE, Dkt. 117 at pp. 6-7.)

168. As mentioned above, the Accused Eufy S1 Pro was purchased in the United States through the Eufy website (www.eufy.com) on May 19, 2026 (product and packaging photographs in **Exhibits 53**; receipt from purchase in **Exhibit 54**).

169. In addition, the Accused Eufy S1 was also purchased in the United States through the website Amazon.com on August 14, 2026. The Amazon.com listing for this product provides specifications identifying the manufacturer as Shenzhen TPH. Attached as **Exhibit 87** are true and accurate photographs of an Accused Eufy S1 wearable breast pump, including the labels affixed on the product packaging, the receipt for this purchase, and true and accurate screenshots of the product specifications from Amazon.com.

170. Additionally, attached as **Exhibit 85** are true and accurate screenshots taken from the FDA's website showing an Establishment Registration and a 510(k) Premarket Notification identifying Shenzhen TPH as the manufacturer of all the various accused Eufy branded wearable breast pumps at issue in this matter.

171. Attached as **Exhibit 49** are numerous true and accurate printouts retrieved from Descartes Datamyne and Import Genius demonstrating importation of wearable breast pump products under subheadings 8413 and/or 3926 of the HTSUS Code, and identifying Respondent Shenzhen TPH as the shipper of such products to various recipients / importers in the United States, with numerous arrival dates throughout 2024, 2025, and 2026.

F. Guangdong Horigen Mother & Baby Products Co., Ltd

172. Upon information and belief, Horigen Mother & Baby, among other things, is engaged in the sale for importation into the United States and/or importation of certain wearable breast pump products, associated milk storage containers, and components thereof, including certain of the Accused Momcozy Products.

173. Upon further information and belief, Horigen Mother & Baby, through various agents (including co-Respondents), manufactures these products in China, and then sells them for importation and/or imports the products depicted in **Exhibits 8-44**, detailed throughout this Complaint.

174. Respondent Shenzhen TPH, among other defendants, were named in a United States litigation filed in 2023 and still pending that involved allegations of patent infringement relating to wearable breast pump products. In that case, Respondent Shenzhen TPH admitted that Horigen Mother & Baby is responsible for the “design, development, operation, manufacture, and/or testing” of at least the S9, S12 Pro, and M5 Accused Momcozy Products at issue in this matter “on behalf of Momcozy.” Attached as **Exhibit 52** is a true and accurate copy of the Answer filed on January 14, 2025, in the United States District Court for the Western District of Washington (Case No. 23-631-KKE, Dkt. 140 at pp. 12-13.)

175. Attached as **Exhibit 72** are true and accurate screenshots taken from the FDA’s website showing an Establishment Registration and device listing identifying Horigen Mother & Baby as the manufacturer of various wearable breast pumps similar to those at issue in this matter. Attached as **Exhibit 73** are true and accurate screenshots taken from Horigen Mother & Baby’s website (<https://www.horigen.com.cn/collections/breast-pump>) showing and offering for sale numerous wearable breast pump products that appear to be nearly identical to the accused wearable breast pump products.

176. Attached as **Exhibit 51** are true and accurate Bills of Lading and printouts retrieved from Descartes Datamyne and Import Genius demonstrating importation of wearable breast pump products under subheadings 8413 and/or 3926 of the HTSUS Code, and identifying Respondent

Horigen Mother & Baby as the shipper of such products to various other recipients / importers in the United States, with numerous arrival dates 2022 through 2026.

G. Anker Innovations Limited

177. Upon information and belief, Anker Innovations, among other things, is engaged in the sale for importation into the United States and/or importation of certain wearable breast pumps, associated milk storage containers, and components thereof, including all the Accused Eufy Products. Upon information and belief, Anker Innovations, through various agents (including co-Respondents), manufactures these products in China, and then sells them for importation and/or facilitates their importation into the United States.

178. Attached as **Exhibit 53** are true and accurate photographs of an Accused Eufy S1 Pro wearable breast pump, including the labels affixed on the product packaging identifying Anker Innovations. This product was purchased in the United States through the Eufy website (www.eufy.com) on May 19, 2026. These photos indicate that the product was made in China.

179. Attached as **Exhibit 54** are true and accurate copies of the receipt from Eufy.com for the May 19, 2026, purchase of the Accused Eufy S1 Pro wearable breast pump shown above.

180. Attached as **Exhibit 55** is a true and accurate copy of the Instruction Manual that was included in the packaging for the Accused Eufy S1 Pro wearable breast pump shown above.

181. Attached as **Exhibit 56** are true and accurate screenshots taken from Eufy's website (www.eufy.com) on July 20, 2026, showing the Accused Eufy S1 Pro wearable breast pump available for purchase online.

182. Attached as **Exhibit 57** are true and accurate photographs of an Accused Eufy S2 Pro wearable breast pump, including the labels affixed on the product packaging identifying Anker Innovations and the address in Hong Kong listed above. This product was purchased in the United

States through the Eufy website (www.eufy.com) on May 19, 2026. These photos indicate that the product was made in China.

183. Attached as **Exhibit 58** are true and accurate copies of the receipt from Eufy.com for the May 19, 2026, purchase of the Accused Eufy S2 Pro wearable breast pump shown above.

184. Attached as **Exhibit 59** is a true and accurate copy of the Instruction Manual that was included in the packaging for the Accused Eufy S2 Pro wearable breast pump shown above.

185. Attached as **Exhibit 60** are true and accurate screenshots taken from Eufy's website (www.eufy.com) on July 20, 2026, showing the Accused Eufy S2 Pro wearable breast pump available for purchase online.

186. Attached as **Exhibit 61** are true and accurate photographs of Accused Eufy S2 / S2 Pro pump replacement partes, and specifically the "milk container," including the labels affixed on the product packaging identifying Anker Innovations. This product was purchased in the United States through the website Amazon.com on July 23, 2026. These photos indicate that the product was made in China.

187. Attached as **Exhibit 62** are true and accurate copies of the receipt from Amazon.com for the purchase of the Accused Eufy S2 / S2 Pro pump replacement partes, and specifically the "milk container," shown above.

188. Attached as **Exhibit 63** are true and accurate screenshots taken from Amazon.com on July 21, 2026, showing the Accused Eufy S2 / S2 Pro pump replacement partes, and specifically the "milk container," available for purchase online.

189. Attached as **Exhibit 64** are true and accurate screenshots taken from Anker Innovations' website where it identifies Eufy as one of its "brands" and links to the Eufy website where, among other things, the Accused Eufy Products are available for purchase.

190. Attached as **Exhibit 65** are true and accurate printouts from the Trademark Electronic Search System (TESS) of the U.S. Patent and Trademark Office showing, among other things, that the owner of the United States trademark for Eufy Baby covering breast pumps is Anker Innovations.

191. Attached as **Exhibit 66** are true and accurate printouts retrieved from Descartes Datamyne demonstrating importation of wearable breast pump products under subheadings 8413 and/or 3926 of the HTSUS Code, and identifying Respondent Anker Innovations as the shipper of such products to Respondents Fantasia Trading and/or Power Mobile Life as consignees or final receiver of the shipped goods, along with other recipients / importers in the United States, with numerous arrival dates in 2024 and 2025.

H. Fantasia Trading LLC

192. Upon information and belief, Fantasia Trading is, among other things, a subsidiary of Respondent Anker Innovations and engaged in the importation into the United States and/or sale after importation of wearable breast pump products, associated milk storage containers, and components thereof, including all the Accused Eufy Products. Attached as **Exhibit 67** are true and accurate screenshots taken from the website of the Delaware and California Secretaries of State showing Fantasia Trading is a Delaware company and its location in Ontario, California.

193. Attached as **Exhibit 68** are true and accurate screenshots taken from Eufy's website (www.eufy.com) where, among other things, the Accused Eufy Products are available for purchase and has a copyright notice for "Fantasia Trading LLC" at the bottom of the page. All the Accused Eufy Products detailed above in **Exhibits 53-63** were purchased in the United States directly from the www.eufy.com website on various dates between May and July 2026.

194. Attached as **Exhibit 69** are true and accurate printouts retrieved from Descartes Datamyne demonstrating importation of wearable breast pump products under subheadings 8413

and/or 3926 of the HTSUS Code, and identifying Respondent Anker Innovations as the shipper of such products to Respondents Fantasia Trading and/or Power Mobile Life as consignees or final receiver of the shipped goods, along with other recipients / importers in the United States, with numerous arrival dates in 2024, 2025, and 2026.

I. Power Mobile Life LLC

195. Upon and belief, Power Mobile Life is, among other things, also a subsidiary of Anker Innovations and engaged in the importation into the United States and/or sale after importation of wearable breast pump products, associated milk storage containers, and components thereof, including all the Accused Eufy Products. Attached as **Exhibit 70** are true and accurate screenshots taken from the website of the Washington Secretary of State showing Power Mobile Life is a Washington company and its location in Bellevue, Washington.

196. As mentioned above, the Accused Eufy S1 was purchased in the United States through the website Amazon.com on August 14, 2026. The Amazon.com listing for this product (and all EufyHome products) provides “Detailed Seller Information” that identifies the “Business Name” as Power Mobile Life and lists the same Bellevue, Washington address in Power Mobile Life’s Washington Secretary of State filing. Attached as **Exhibit 87** are true and accurate photographs of an Accused Eufy S1 wearable breast pump, including the labels affixed on the product packaging, the receipt for this purchase, and true and accurate screenshots of the “Detailed Seller Information” listed on Amazon.com.

197. Attached as **Exhibit 71** are true and accurate printouts retrieved from Descartes Datamyne demonstrating importation of wearable breast pump products under subheadings 8413 and/or 3926 of the HTSUS Code, and identifying Respondents Anker Innovations and TPH Technology Malaysia Sdn Bhd as the shipper of such products to Power Mobile Life as consignee

or final receiver of the shipped goods, along with other recipients / importers in the United States, with arrival dates in 2024, 2025, and 2026.

J. Guangdong Youmeng Electrical Technology Co., Ltd

198. Upon information and belief, Youmeng, among other things, is engaged in the sale for importation into the United States and/or importation of certain wearable breast pump products, associated milk storage containers, and components thereof, including certain of the Accused Momcozy Products. Upon further information and belief, Youmeng, through various agents (including co-Respondents), manufactures these products in China, and then sells them for importation and/or imports the products depicted in **Exhibits 8-44**, detailed throughout the Complaint.

199. Attached as **Exhibit 7** are true and accurate screenshots taken from the FDA's website showing an Establishment Registration and device listing that identifies Youmeng as the manufacturer or contract manufacturer of certain Accused Momcozy Products at issue in this matter.

200. Additionally, Respondent Shenzhen TPH, among other defendants, was named in a United States litigation filed in 2023 and still pending that involved allegations of patent infringement pertaining to wearable breast pump products. In that case, Respondent Shenzhen TPH admitted that Respondent Youmeng is responsible for the "design, development, operation, manufacture, and/or testing" of at least the S9 Pro, S12 Pro, and M5 Accused Momcozy Products at issue in this matter "on behalf of Momcozy." See **Exhibit 52** (Case No. 23-631-KKE, Dkt. 140 at pp. 12-13.)

201. Attached as **Exhibit 40** are true and accurate printouts retrieved from Descartes Datamyne demonstrating importation of wearable breast pump products under subheadings 8413

and/or 3926 of the HTSUS Code, and identifying Respondent Youmeng as the shipper of such products to recipients / importers in the United States, with arrival dates in 2025 and 2026.

K. TPH Technology Malaysia Sdn Bhd

202. Upon information and belief, TPH Technology, among other things, is engaged in the sale for importation into the United States and/or importation of certain wearable breast pump products, associated milk storage containers, and components thereof, including certain of the Accused Eufy Products. Upon further information and belief, TPH Technology, through various agents (including co-Respondents), manufactures these products in China, and then sells them for importation and/or imports the products depicted in **Exhibits 53-63**, detailed throughout this Complaint.

203. Attached as **Exhibit 74** are true and accurate printouts retrieved from Descartes Datamyne demonstrating importation of wearable breast pump products under subheadings 8413 and/or 3926 of the HTSUS Code, and identifying TPH Technology as the shipper of such products to Respondents Power Mobile Life as consignee or final receiver of the shipped goods, along with other recipients / importers in the United States, with numerous arrival dates in 2024, 2025, and 2026.

L. Foshan Shunde Ruiteng Electrical Appliance Manufacturing Co. Ltd. (a.k.a., Joystar Electrical Appliances Manufacturing Co. Ltd)

204. Upon information and belief, Joystar Electrical, among other things, is engaged in the sale for importation into the United States and/or importation of certain wearable breast pump products, associated milk storage containers, and components thereof, including certain of the Accused Momcozy Products. Upon further information and belief, Joystar Electrical, through various agents (including co-Respondents), manufactures these products in China, and then sells

them for importation and/or imports the products depicted in **Exhibits 8-44**, detailed throughout this Complaint.

205. Attached as **Exhibit 39** are true and accurate screenshots taken from the FDA's website showing an Establishment Registration and device listing that identifies Joystar Electrical as the manufacturer or contract manufacturer of certain Accused Momcozy Products at issue in this matter.

206. Additionally, Respondent Shenzhen TPH, among other defendants, were named in a United States litigation filed in 2023 and still pending that involved allegations of patent infringement pertaining to wearable breast pump products. In that case, Respondent Shenzhen TPH admitted that Respondent Joystar Electrical is responsible for the "design, development, operation, manufacture, and/or testing" of at least the S9 Pro, S12, S12 Pro, and M5 Accused Momcozy Products at issue in this matter "on behalf of Momcozy." *See Exhibit 52* (Case No. 23-631-KKE, Dkt. 140 at pp. 12-13.)

* * *

207. In sum, all of the evidence above indicates that, among other things and on information and belief: (a) the product packaging for and/or insignia on all the Accused Products that have been purchased indicate that the products are "Made in China" or "Manufactured in China"; (b) at least Respondents Shenzhen Root, Hong Kong Lute, Youmeng, Joystar Electrical, TPH Technology, Shenzhen TPH, and Horigen Mother & Baby manufacture the Accused Products, or cause the Accused Products to be manufactured, at facilities in China; (c) at least Respondents Anker Innovations, Hong Kong Lute, Shenzhen Root, Root Technology, Share Info, Anker Innovations, Power Mobile, and Fantasia Trading, or through their respective authorized agents, are involved the importation of the Accused products by selling the Accused Products for

importation, otherwise facilitating transport of the Accused Products to the United States, importing the Accused Products into the United States and/or selling within the United States after importation; and (d) finally, Respondents Shenzhen Root, Root Technology, Share Info, Anker Innovations, Power Mobile, and Fantasia Trading directly and/or through their respective authorized agents, sell and offer for sale the Accused Products under the Momcozy brand or Eufy brand within the United States to distributors, independent retailers, and other resellers in the United States, as well as directly to end-user consumers in the United States via their respective websites or online retailers like Amazon.com.

208. As mentioned above, while Willow believes that its detailed research and analysis has accurately identified the appropriate Respondents for this matter—through ascertaining, based upon various types of evidence, the entities responsible for the importation, sale for importation, and sale in the United States after importation of the Accused Products—the supply chain and shipment / importation records for both the Momcozy Respondents and Eufy Respondents are an amorphous and ever-changing (perhaps intentionally so) network of affiliated entities, distributors, resellers, customs brokers, contract manufacturers, and third-party logistics providers.

209. For example, the following are entity names formerly used by some or all the Momcozy Respondents or agents acting on their behalf, or currently used by some or all the Momcozy Respondents as an “aka” or alias: Shenzhen Lutejiacheng Network Technology Co., Ltd.; Shenzhen Lute Innovation Technology Co., Ltd.; Shenzhen Lutejiacheng Technology Co., Ltd.; Shenzhen Root E-Commerce Co., Ltd.; Shenzhen Root Technology Co., Ltd.; Root Innovation Technology Co., Ltd.; Shenzhen Lute Technology Co., Ltd.; Hainan Root Technology Co., Ltd.; Shenzhen Conglin e-Commerce Co., Ltd.; Shenzhen Lutejiacheng Supply Chain Management Co., Ltd.; Shenzhen Jinruihang Technology Co., Ltd.; Shenzhen Xitao Network

Technology Co., Ltd.; Shenzhen Yuyou Technology Co., Ltd.; and Hong Kong Dian Ying Industry Co., Ltd.

210. Similarly, the following are entity names formerly used by some or all the Eufy Respondents or agents acting on their behalf, or currently used by some or all the Eufy Respondents as an “aka” or alias: Anker Innovations Technology Co., Ltd., and Shenzhen Oceanwing Smart Innovations Technology Co., Ltd.

211. Willow reserves the right to amend its pleading, as necessary, should further research or discovery from the instituted investigation reveal that some or all these entities, or others, are currently involved in the importation, sale for importation, and/or sale after importation of the Accused Products or products otherwise within the scope of the investigation.

VIII. HARMONIZED TARIFF SCHEDULE NUMBERS

212. Upon information and belief, the Accused Products have been imported into the United States under at least the following provisions of the Harmonized Tariff Schedule of the United States (“HTSUS”): 8413.50, 8413.81, 8413.91, 3924.90, and 3926.90. These numbers are exemplary, and Willow will provide updated HTSUS numbers as they are discovered throughout the course of the investigation.

213. The above-identified HTSUS codes are illustrative and not exhaustive. The identifications are not intended to restrict the scope of the investigation, nor are they intended to restrict the scope of any remedial orders to be issued by the Commission or limit the types of products relevant to this proceeding.

IX. LITIGATION AND RELATED PROCEEDINGS

214. Pursuant to 19 C.F.R. § 210.12(a)(5), Willow states that, to the best of its knowledge, the Asserted Patents have not been the subject of any court, agency, or arbitration proceedings as of the date of this filing.

X. DOMESTIC INDUSTRY

215. An industry as required by Section 337(a)(2) and as defined by Section 337(a)(3) exists and/or is in the process of being established in the United States. Willow offers in the U.S. market several different wearable breast pump products and associated milk storage containers that embody one or more claims of the Asserted Patents, including the DI Products.

216. Willow Innovations is a Delaware corporation with its principal place of business in Mountain View, California. The vast majority of Willow's business activities, including with respect to the DI Products, occur in the United States. In fact, Willow is one of the only leading breast pump brands founded and based in the United States.

217. Willow has spent millions of dollars in the United States relating to the design, development, manufacture, packaging, distribution, marketing, sale, and customer support of its wearable breast pump products and associated milk storage containers, including the DI Products. Willow will continue to spend millions of dollars on these activities in the United States in 2026 and for years to come.

A. The DI Products Practice the Asserted Patents

218. **Exhibit 4A** contains a claim chart showing that the Willow Go product practices at least Claim 1 of the '380 Patent.

219. **Exhibit 4B** contains a claim chart showing that the Willow 360 product practices at least Claim 1 of the '380 Patent.

220. **Exhibit 4C** contains a claim chart showing that the Willow Go product practices at least Claim 1 of the '292 Patent.

221. **Exhibit 4D** contains a claim chart showing that the Willow 360 product practices at least Claim 1 of the '292 Patent.

222. **Exhibit 4E** contains a claim chart showing that the Willow Go product practices the Figures of the ‘D344 Patent. Given that the Willow Go itself contains the same Splashguard Container as is sold separately as a replacement part, Willow charted the Willow Go pump product as representative of all Willow Go products and Splashguard Container replacement parts.

223. **Exhibit 4F** contains a claim chart showing that the Elvie Pump product practices at least Claim 1 of the ‘388 Patent.

224. **Exhibit 4G** contains a claim chart showing that the Elvie Pump product practices the Figures of the ‘D993 Patent. Given that the Elvie Pump itself contains the same Bottle product as is sold separately as a replacement part, Willow charted the Elvie Pump product as representative of all Elvie Pump products and bottle replacement parts.

225. Attached as **Exhibit 75** are true and accurate screenshots taken from Willow’s website (www.onewillow.com) on July 7, 2026, showing wearable breast pump products sold by Willow, including the Willow Go wearable breast pump.

226. Attached as **Exhibit 76** are true and accurate screenshots taken from Willow’s website (www.onewillow.com) on July 7, 2026, showing wearable breast pump products sold by Willow, including the Willow 360 wearable breast pump.

227. Attached as **Exhibit 77** are true and accurate screenshots taken from Willow’s Elvie website (www.elvie.com) on July 7, 2026, showing wearable breast pump products sold by Willow, including the Elvie Pump wearable breast pump.

228. Attached as **Exhibit 78** are true and accurate screenshots taken from Willow’s website (www.onewillow.com) on July 7, 2026, showing wearable breast pump products and associated milk storage containers sold by Willow, including the Willow Go Splashguard Container product.

229. Attached as **Exhibit 79** are true and accurate screenshots taken from Willow’s Elvie website (www.elvie.com) on July 7, 2026, showing wearable breast pump products and associated milk storage containers sold by Willow, including the Elvie Pump Bottle product.

B. Willow’s Investments in the United States Relating to Products that Embody the Willow Asserted Patents

230. Willow has made, and continues to make, significant and substantial investments in the United States to create, improve, and support its line of wearable breast pumps and associated milk storage containers, including the Willow DI Products. These investments have been ongoing for years and will continue in 2026 and beyond, including in connection with the potential development and commercialization of new wearable breast pump products and associated milk storage containers practicing claims of the Willow Patents.

231. Willow’s U.S. investments relating to wearable breast pump products and associated milk storage containers are in the form of, among other things, expenditures on U.S. facilities where a wide range of work is performed in connection with such products; expenditures on salaries and benefits for U.S. employees directly involved in the design, development, production, distribution, marketing, sales, and customer support of such products; and expenditures on research and development (“R&D”) and engineering-related activities that led to the creation and contribute to the ongoing improvement of such products.

1. Significant Investment in Plant and Equipment

232. Willow’s relevant U.S. investments in plant and equipment include, but are not limited to, expenditures on the company’s primary facilities that Willow leases, including rent and maintenance for such facilities; the associated utility expenditures; and expenditures on fulfillment and warehousing. Willow’s domestic investments in plant and equipment are significant.

233. The details of Willow's U.S. plant and equipment investments relating to the Willow DI Products are described in the Declaration of Sarah O'Leary, attached hereto as **CONFIDENTIAL Exhibit 3** at ¶¶ 18-22.

2. Significant Employment of Labor and Capital

234. Willow's U.S. employment of labor and capital includes, but is not limited to, the payment of salaries, benefits, and insurance for employees (and some consultants/contractors) directly involved in the R&D, testing, validation, production, quality control, distribution, marketing, sale, and customer service of its wearable breast pump products and associated milk storage containers, including the DI Products. Willow's domestic employment of labor and capital is significant.

235. The details of Willow's U.S. employment of labor and capital relating to the Willow DI Products are described in the Declaration of Sarah O'Leary, attached hereto as **CONFIDENTIAL Exhibit 3** at ¶¶ 23-26.

3. Substantial Investments in Engineering, Research, and Development

236. Willow's U.S. investments towards exploitation of the Asserted Patents include, but are not limited to, expenditures on various R&D and engineering-related activities associated with the Willow DI Products, such as the payment of salaries, benefits and insurance for employees involved in such work; and expenditures directly tied to product development within the Willow DI Products, including costs associated with prototypes, testing, and third-party laboratories. Willow's domestic investments in engineering and R&D are substantial.

237. The details of Willow's U.S. investments in engineering and R&D relating to the Willow DI Products and Willow Patents are described in the Declaration of Sarah O'Leary, attached hereto as **CONFIDENTIAL Exhibit 3** at ¶¶ 27-30.

C. Willow’s Acquisition of Elvie and the Associated Domestic Industry that Exists or is in the Process of Being Established

238. On March 28, 2025, Willow acquired certain assets of Chiaro Technology Limited (“Elvie”), a United Kingdom-based innovator of women’s health products, including wearable breast pumps, smart pelvic tools, and sleep solutions.

239. As part of this transaction, Willow purchased, among other things, Elvie’s equipment, customer list, social media accounts, and business intellectual property, including the Elvie Patents. Willow continues to sell the Elvie DI Products post-acquisition.

240. Willow directs Elvie’s legacy United Kingdom operations through Willow Blossom Holdco Limited. Willow has taken (and is taking) tangible steps to establish Elvie operations in the United States. For example, since the Elvie acquisition, Willow has scaled down the legacy United Kingdom operations significantly by selling off U.K.-based assets acquired in the transaction, reducing Elvie’s U.K.-based workforce, and transitioning Elvie-related activities to Willow’s employees based in the United States.

241. Currently, all U.S.-based Willow employees perform activities in support of Elvie products, including the Elvie DI Products. This includes R&D activities, as Elvie’s legacy U.K.-based research and development was largely shuttered in January 2026, and such R&D projects were transferred to Willow’s U.S.-based team.

242. Since the acquisition in March 2025, Willow has made, with respect to the Elvie DI Products, significant U.S. investments in plant and equipment, significant U.S. employment of labor and capital, and substantial U.S. investments in engineering and R&D.

243. The details of Willow’s U.S. investments relating to the Elvie DI Products and Elvie Patents are described in the Declaration of Sarah O’Leary, attached hereto as **CONFIDENTIAL Exhibit 3** at ¶¶ 31-38.

244. To the extent it is determined that a domestic industry does not presently exist for the Elvie DI Products, Willow alternatively submits that, since the acquisition of Elvie in March 2025, a domestic industry with respect to the Elvie DI Products is in the process of being established.

245. Willow's U.S.-based personnel now oversees most of the distribution, sales, and customer service of the Elvie DI Products, and Willow is currently evaluating the next generation Elvie breast pump using its U.S.-based personnel. Indeed, Willow intends to continue developing Elvie-branded products using its U.S. workforce.

246. Since acquiring Elvie in March 2025, Willow has actively taken necessary, tangible steps to establish a domestic industry with respect to the Elvie DI Products, including (but not limited to) through activities that further exploit the Elvie Patents, such as the hiring of new U.S. employees (and potential workspace expansions relating to same), the methodical transition of Elvie-related work to Willow's U.S.-based personnel, and ongoing efforts to design, manufacture, distribute, sell, and support the Elvie DI Products from within the United States rather than from the United Kingdom.

247. Indeed, the active onshoring of labor that was previously performed outside the United States is one example of Willow's ongoing establishment of a domestic industry with respect to the Elvie DI Products. This initiative is consistent with the legislative intent of Section 337 and the underlying policy objective of encouraging U.S. economic activity. "By adding section 337(a)(3)(C) and the language 'in the process of being established' to section 337(a)(2), Congress intended to encourage entities of all sizes to establish new industries." *Certain Multimedia Display & Navigation Devices & Sys., Components Thereof, & Prods. Containing Same*, Inv. No. 337-TA-694, Comm'n Op. at 25, 2011 WL 3813121, at *10 (July 22, 2011). *See also id.*, quoting S. Rep.

No. 71, 100th Cong., 1st Sess., at 130 (1987)) (“Congress intended to liberalize the domestic industry requirement so that it could be satisfied by all ‘holders of U.S. intellectual property rights who are engaged in activities genuinely designed to exploit their intellectual property’ in the United States.”).

248. Willow’s deliberate efforts and corresponding investments to incorporate the Elvie brand and operations into its U.S.-based business are significant and substantial, and there is a significant likelihood that an industry within the United States (as defined by 19 U.S.C. §1337), with respect to the Elvie DI Products, will exist in the near future, to the extent it does not already.

XI. REQUEST FOR RELIEF

249. By reason of the foregoing, Willow requests that the U.S. International Trade Commission:

- a. Institute an immediate investigation, pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337, to determine whether the Respondents have violated Section 337 based upon the sale for importation into the United States, the importation into the United States, and/or the sale within the United States after importation of the Accused Products;
- b. Schedule and conduct a hearing on permanent relief pursuant to 19 U.S.C. § 1337(c) for the purpose of receiving evidence and hearing argument concerning whether there have been violations of Section 337 and, following the hearing, to determine that there have been violations of Section 337;
- c. Issue a permanent limited exclusion order, pursuant to 19 U.S.C. § 1337(d),

specifically directed to each of the named Respondents and their subsidiaries, predecessors, affiliates, agents, successors, assigns, customers (etc.), excluding the Accused Products from entry into the United States;

- d. Issue permanent cease and desist orders, pursuant to 19 U.S.C. § 1337(f), prohibiting Respondents, and their parents, subsidiaries, predecessors, agents, successors, assigns, or other affiliates from importing, admitting or withdrawing from a foreign trade zone, marketing, advertising, demonstrating, warehousing inventory, distributing, offering for sale, selling, licensing, repairing, using after importation, testing, and/or transferring within the United States the Accused Products;
- e. Impose a bond upon each of the named Respondents' importation and sales of Accused Products during the sixty-day Presidential review period pursuant to 19 U.S.C. § 1337(j) to prevent further injury to Willow and its domestic industry; and
- f. Grant such other and further relief as the Commission deems just and proper based on the facts determined by the investigation and the authority of the Commission.

Dated: August 19, 2026

Respectfully submitted,

/s/Beau Jackson

Beau Jackson

HUSCH BLACKWELL LLP

1801 Pennsylvania Avenue, NW

Suite 1000

Washington, DC 20006

Telephone: (202) 378-2406

Beau.Jackson@huschblackwell.com

Travis McCallon

Luke Meriwether

Eric Sidler

Timothy Hadachek

LATHROP GPM LLP

2345 Grand Blvd., Suite 2200

Kansas City, MO 64108

Telephone: (816) 292-2000

Travis.McCallon@lathropgpm.com

Luke.Meriwether@lathropgpm.com

Eric.Sidler@lathropgpm.com

Timothy.Hadachek@lathropgpm.com

Counsel for Complainants

Willow Innovations, Inc. and

Willow Blossom HoldCo Ltd.

VERIFICATION OF COMPLAINT

I, Sarah O’Leary, hereby declare, in accordance with 19 C.F.R. §§ 210.4 and 210.12(a), as follows:

1. I am Chief Executive Officer of Willow Innovations, Inc.
2. Willow Blossom is a wholly owned subsidiary of Willow Innovations.
3. I am duly authorized to sign this Complaint;
4. I have read the Complaint, and I am aware of its contents;
5. The Complaint is not being presented for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation;
6. To the best of my knowledge, information, and belief founded upon reasonable inquiry, the claims and legal contentions of the Complaint are warranted by existing law or a nonfrivolous argument for the extension, modification, or reversal of existing law or the establishment of new law; and
7. The allegations and other factual contentions made in the Complaint have evidentiary support or are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 18th day of August, 2026.

DocuSigned by:

D9EB860619704D1...

Willow Innovations, Inc. and
Willow Blossom HoldCo Ltd.