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September 23, 2026

VIA ELECTRONIC FILING

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

Re: *Supplement to Section 337 Complaint by Willow Innovations, Inc. and Willow Blossom HoldCo Ltd.: Certain Wearable Breast Pumps, Associated Milk Storage Containers, and Components Thereof, Inv. No. 337-TA-1522*

Dear Secretary Barton:

Complainants Willow Innovations, Inc. and Willow Blossom HoldCo Ltd. (“Willow” or “Complainants”) respectfully submit modifications to a single paragraph of—and submit one additional exhibit to—its Section 337 Complaint originally filed on August 20, 2026. Pursuant to 19 C.F.R. § 210.12, these clarifications are necessary because Willow noticed a misstatement in the asserted allegation in paragraph 167 and also noticed that, by mistake, it did not submit an additional exhibit. These clarifications, importantly, do not alter the substance of the allegations made by Willow in paragraph 167 or the Complaint as a whole, including as to Shenzhen TPH Technology Co., Ltd. being an appropriately named Respondent.

As such, Willow respectfully submits the following modifications and additions to its Complaint and Exhibits thereto.¹

- **Para 167:** “counterclaim” inserted before “defendants”; “Respondents Shenzhen Root and Hong Kong Lute” added in place of second “Shenzhen TPH”; “themselves” added in place of “itself”; “stated” added in place of “admitted”; “Shenzhen TPH” added in place of “it”; “and” added in between “S9” and “S12”; “M6, M9, and M5” deleted. And new sentences inserted

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

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at the end of the paragraph: “In that same lawsuit, Shenzhen TPH (along with other entities) submitted a proposed Consent Judgment whereby they collectively referred to themselves as ‘Momcozy’ and noted that Momcozy ‘makes, uses, offers to sell, sells, and/or imports’ the S9, S9 Pro, S12, S12 Pro, M5, MobileStyle (M6), and Mobile Flow (M9) Accused Momcozy Products at issue in this matter. Attached as **Exhibit 88** is a true and accurate copy of the proposed Consent Judgment filed on June 17, 2026, in the United States District Court for the Western District of Washington (Case No. 23-631-KKE, Dkt. 168-1 at pp. 1-2.).”

- **Ex. 88:** New exhibit containing the proposed Consent Judgment filed by Shenzhen TPH and others in the Western District of Washington.

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.*

Enclosure (new Exhibit 88 to the Complaint)

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CERTIFICATE OF SERVICE

I certify that, on September 23, 2026, the foregoing was filed and served upon the following as indicated:

The Honorable Lisa R. Barton Secretary to the Commission U.S. International Trade Commission 500 E Street, S.W., Room 112 Washington, D.C. 20436	<i>Via EDIS</i>
Shenzhen Root Innovation Technology Co., Ltd. #2-201, Floor 2, Hasee Computer Building No. 2 Beier Road, Bantian Street Longgang, Shenzhen, Guangdong, China 518129	<i>Via Mail</i>
Hong Kong Lute Technology Co., Ltd. 18121 E. Hampden Avenue, Unit C #1007 Aurora, CO 80013	<i>Via Mail</i>
Root Technology, Ltd. 9030 Wilshire Boulevard Beverly Hills, California 90211	<i>Via Mail</i>
Share Info, Inc. 3557 158th Street Flushing, New York 11358	<i>Via Mail</i>
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	<i>Via Mail</i>
Guangdong Horigen Mother & Baby Products Co., Ltd. No. 18 Pingnan Industrial Zone Mianbei Street, Chaoyang District Shantou City, Guangdong, China 515100	<i>Via Mail</i>
Anker Innovations Limited Unit / Room 56, 8th Floor, Admiralty Centre Tower 218 Harcourt Road Hong Kong 000000	<i>Via Mail</i>

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Fantasia Trading, LLC 5350 Ontario Mills Parkway, Suite 100 Ontario, California 91764	<i>Via Mail</i>
Power Mobile Life LLC 10800 NE 8th Street, Suite 900 Bellevue, Washington 98004	<i>Via Mail</i>
TPH Technology Malaysia Sdn Bhd No. 2 (Block C) / 2C Jalan Rawang Indah 1 Taman Industri Integrasi Rawang 48000 Rawang Selangor, Malaysia 48000	<i>Via Mail</i>
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	<i>Via Mail</i>
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	<i>Via Mail</i>

/s/ Roxanne Vorkoeper
 Roxanne Vorkoeper
 Paralegal
 Husch Blackwell, LLP