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September 29, 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 The Ergobaby Carrier, Inc.: Certain Adjustable
Child Carriers and Components Thereof, Inv. No. 337-TA-1514***

Dear Secretary Barton:

Pursuant to the Court's Order No. 15 granting Complainant's Motion to Amend the Complaint and Notice of Investigation (EDIS No. 895682), enclosed please find the following documents:

1. One electronic copy of the verified Non-Confidential Amended Complaint;
2. One electronic copy of the verified Confidential Amended Complaint;
3. One electronic copy of the accompanying Non-Confidential Exhibits 43;
4. One electronic copy of the Confidential Exhibits 44 and 45.

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

HUSCH BLACKWELL

Respectfully submitted,

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

Beau Jackson

*Counsel for Complainant
The Ergobaby Carrier, Inc.*

Enclosures

PUBLIC VERSION

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, DC**

In the Matter of

**CERTAIN ADJUSTABLE CHILD
CARRIERS AND COMPONENTS
THEREOF**

Inv. No. 337-TA-1514

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

Complainant:

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Torrance, CA 90502
Telephone: (213) 607-1904

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Jime District
Xiamen City, Fujian Province, China 361000

Xiamen New Baby Products Co., Ltd.
Room 401, No. 361-1 Qiaoying Road
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Telephone: +86 (592) 5185820

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Xiamen, Fujian Province, China 361000
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37 West 26th Street, 6th Floor
New York, NY 10010
Telephone: (212) 645-2340

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Jimei District
Xiamen, Fujian Province, China 361000
Telephone: +86-13559235101

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LIST OF EXHIBITS

Exhibit No.	Description
1	Copies of Asserted Patents ¹ Ex. 1A Copy of '275 patent Ex. 1B Copy of '470 patent
2	Copies of Assignments of Asserted Patents Ex. 2A Copy of assignment record for '275 patent Ex. 2B Copy of assignment record for '470 patent
3	Copies of Prosecution History for Asserted Patents Ex. 3A Copy of Prosecution History of '275 Patent Ex. 3B Copy of References cited in Prosecution History of '275 Patent Ex. 3C Copy of Prosecution History of '470 Patent Ex. 3D Copy of References cited in Prosecution History of '470 Patent Ex. 3E Copy of Prosecution History of Priority Application 62/248,745
4	CONFIDENTIAL Declaration of Jim Stein
5	Claim Charts Showing Domestic Industry Products Practice the Asserted Patents Ex. 5A Claim Chart showing Ergobaby Omni Classic practices claim 1 of the '275 patent Ex. 5B Claim Chart showing Ergobaby Omni Classic practices claim 1 of the '470 patent
6	Claim Charts Showing Infringement of the Asserted Patents by the Accused Products Ex. 6A Claim Chart showing Mabe carrier practices independent claim 1 of the '275 patent Ex. 6B Claim Chart showing Mabe carrier practices independent claims 1, 8, and 18 of the '470 patent Ex. 6C Claim Chart showing Nest Blanche carrier practices independent claim 1 of the '275 patent Ex. 6D Claim Chart showing Nest Blanche carrier practices independent claims 1, 8, and 18 of the '470 patent

¹ Pursuant to Commission Rule 210.12, Ergobaby ordered certified copies of all patent related documents (patents in Exhibit 1, assignments in Exhibit 2, and prosecution histories in Exhibit 3) on March 24, 2026, but has not received them as of the date of this submission. Ergobaby will provide the requisite certified copies to the Commission as soon as it receives them.

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	Ex. 6E Claim Chart showing Portier carrier practices independent claim 1 of the '275 patent Ex. 6F Claim Chart showing Portier carrier practices independent claims 1, 8, and 18 of the '470 patent Ex. 6G Claim Chart showing Ava & Oliver carrier practices independent claim 1 of the '275 patent Ex. 6H Claim Chart showing Ava & Oliver carrier practices independent claims 1, 8, and 18 of the '470 patent Ex. 6I Claim Chart showing Artipoppe carrier practices independent claim 1 of the '275 patent Ex. 6J Claim Chart showing Artipoppe carrier practices independent claims 1, 8, and 18 of the '470 patent
7	CONFIDENTIAL List of Licensees of the Asserted Patents
8	Images of Mabe Monarch product sample
9	Amazon.com receipt for purchase of Mabe Monarch product sample
10	Instruction Manual for Mabe Monarch
11	Screenshots from Mabe's website dated May 15, 2026
12	Images of Nest Blanche product sample
13	Nestblanche.com receipt for purchase of Nest Blanche product sample
14	Instruction Manual for Nest Blanche / Zoe baby carrier
15	Screenshots from Nest Blanche website dated May 15, 2026
16	Reports from ImportGenius.com re Mabe Monarch import
17	Descartes Datamyne identifying Xiamen Funwhale Tech as shipper of baby carriers to Mabe
18	Reports from ImportGenius.com re importation of baby carrier on December 9, 2025
19	Descartes Datamyne identifying Xiamen New Baby Products Co as shipper of baby carriers to United States entities, with arrival dates throughout 2025.
20	Report from TESS system showing NEST BLANCHE trademark owner is Haixia Wei
21	Screenshot of Happybebi website
22	Complaint between Mabe and Xiamen New Baby Products

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23	Screenshots from Ergobaby’s website dated May 15, 2026, showing Omni Family
24	Images of Portier carrier product sample
25	Receipt for purchase of product sample from Portier’s website (www.portier.co)
26	Instruction Manual for Portier carrier
27	Screenshots from Portier website dated June 9, 2026.
28	Descartes Datamyne records identifying Xiamen New Baby Products Co as shipper of baby carriers to United States with Portier as consignee
29	Images of Ava & Oliver carrier product sample
30	Amazon.com receipt for purchase of Ava & Oliver baby carrier product sample
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32	Screenshots from Ava & Oliver website dated June 9, 2026, and from Hawaii Secretary of State website.
33	Descartes Datamyne records identifying Xiamen New Baby Products Co as shipper of baby carriers to United States with Ava & Oliver as consignee
34	Images of Artipoppe Zeitgeist carrier product sample
35	Receipt for purchase of Artipoppe product sample from Artipoppe website (shop.artipoppe.com)
36	Instruction Manual for Artipoppe Zeitgeist carrier
37	Screenshots from Artipoppe website dated June 10, 2026
38	Descartes Datamyne records identifying Bugaboo International B.V. as shipper of baby carriers to United States with Bugaboo North America as consignee
39	Descartes Datamyne records identifying Bugaboo Xiamen Industrial Co. Ltd. as shipper of baby carriers to United States with Bugaboo North America as consignee
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43	Qichacha webpage about Xiamen Danke Health Technology, Co., Ltd.
44	CONFIDENTIAL Excerpt of Respondent [REDACTED]'s Objections and Responses to Complainant's Second Set of Interrogatories
45	CONFIDENTIAL Excerpt of Respondent [REDACTED]'s Objections and Responses to Complainant's First Set of Interrogatories

I. INTRODUCTION

1. The Ergo Baby Carrier, Inc. (“Ergobaby” or “Complainant”) 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 adjustable child carriers and components thereof.

2. The proposed Respondents are Mabe, LLC , Quanzhou Baby Nice Infant and Child Products Co., Ltd. (*manufacturer of the Accused Mabe Carriers*), Xiamen Funwhale Technology LLC (*manufacturer and/or shipper of the Accused Mabe Carriers*), Portier USA LLC, Ava & Oliver, Xiamen New Baby Products Co., Ltd. (*manufacturer, shipper, and/or importer of the Accused Nest Blanche / Zoe Carriers, the Accused Portier Carriers, and the Accused Ava + Oliver LLC Carriers*), Xiamen Danke Health Technology Co., Ltd. (██████████ *of the Accused Portier Carriers and the Accused Ava & Oliver Carriers*), Koi Trading Services, Inc. (*importer and/or distributor of the Accused Nest Blanche / Zoe Carriers*), Artipoppe B.V. (*designer / importer of the Accused Artipoppe Carriers*), Bugaboo Xiamen Industrial Co. Ltd. (*manufacturer and/or shipper of the Accused Artipoppe Carriers*), Bugaboo International B.V. (*manufacturer and/or shipper of the Accused Artipoppe Carriers*), and Bugaboo North America, Inc. (*importer and/or distributor of the Accused Artipoppe Carriers*) (collectively “Respondents”).

3. The complaint is directed to Respondents’ imported adjustable child carriers and components thereof that infringe one or more of claims of U.S. Patent No. 10,426,275 (“the ’275 Patent”) and one or more of claims of U.S. Patent No. 12,016,470 (“the ’470 Patent”) (collectively the “Asserted Patents”). Such products include but are not limited to Respondents’ adjustable child carrier products imported and sold under at least the “Mabe,” “Mabe Monarch,” “Nest Blanche,” “Nest Blanche Zoe,” “Carrier Zoe,” “Zoe,” “Portier,” “Portier Limitless,” “Ava & Oliver,” “Ava

& Oliver Limitless,” “Artipoppe” and “Artipoppe Zeitgeist” names, brands, and/or labels (collectively, the “Accused Products”).²

4. The following is a list of patent claims asserted by Ergobaby, with independent claims underlined and in bold face type:

ASSERTED PATENT	ASSERTED CLAIMS
'275 Patent	<u>1</u> , 2, 3, 5, 6, 12, 16, 17
'470 Patent	<u>1</u> , 6, 7, <u>8</u> , 9, 10, 11, 17, <u>18</u> , 22, 23, 24, 25

5. Ergobaby is a bona fide American innovator and a significant U.S. employer. Indeed, the Ergobaby products practicing the Asserted Patents were all developed and continue to be refined by American citizens working in the United States. By contrast, the Accused Products were, on information and belief, all developed overseas. Moreover, upon information and belief, and with the possible exception of Mabe and Bugaboo North America, Inc.—which may have a few U.S. employees—the Respondents do not have any meaningful presence in the United States.

6. Since 2003, Ergobaby has been the industry leader in the design and creation of innovative, ergonomic, soft-structured child carrier products that enable and encourage bonding between parents and children. More than two decades ago, Ergobaby’s founder was dissatisfied with existing child carrier products and set out to create something that was beneficial for her baby as well as comfortable, safe, and easy for parents to use. The result was the first Ergobaby Baby Carrier, an innovative, soft structured and adjustable carrier that revolutionized the industry and became the gold standard of baby wearing and baby carrying.

² 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 infringe the Asserted Patents and/or that additional claims are infringed, and any remedy should extend to all infringing adjustable child carriers and components thereof, regardless of how marketed, branded, or sold.

7. Since that time, Ergobaby has continued to innovate and lead the industry in the creation of adjustable and ergonomic baby carriers. With carrier styles to suit every family at every age and stage of a baby's development, Ergobaby has become the highest rated and most recommended child carrier manufacturer, carrying millions of babies and toddlers all over the world.

8. Pertinent to this matter, Ergobaby designs, creates, markets, and sells all-in-one, soft structured child carriers in the United States that provide users with easy adjustability and multiple ergonomic carry modes for babies of various sizes and ages. These child carriers, and specifically those practicing claims of the Asserted Patents, are or have been sold in the United States by Ergobaby under names such as Omni Classic (a/k/a Omni 360), Omni Breeze, Omni Dream, and Omni Deluxe, as shown below (hereinafter, the "Omni Family" or "DI Products"). Products within the Omni Family are similar from a technical and functionality standpoint. Principal differences between the products are limited to fabric and cosmetic options as well as branding/marketing approaches.

OMNI CLASSIC / 360	OMNI DREAM
	
OMNI BREEZE	OMNI DELUXE
	

9. Respondents manufacture, import, sell, and/or offer for sale adjustable child carriers, under various brand names as shown below, that infringe one or more claims of the Asserted Patents.

Respondents & Accused Products

GROUP 1 - The Mabe Respondents:

Mabe, LLC (“Mabe”)

Quanzhou Baby Nice Infant and Child Products Co., Ltd. (“Quanzhou Baby Nice”)

Xiamen Funwhale Technology LLC (“Xiamen Funwhale”)

Accused Products (referred to as the “Accused Mabe Carriers”):

Mabe Monarch baby carrier

Website(s):

Exemplary websites where the Accused Mabe Carriers are available for purchase in the United States:

<https://mabeproducts.com/>

https://www.amazon.com/Mab%C4%93-Monarch-Ergonomic-Baby-Carrier/dp/B0DP9Y3YQT?ref=ast_slp_dp&th=1

MABE

SHOP ABOUT US FAQ HOW TO PRODUCT REGISTRATION CONTACT

USD ▼ 🔍 👤 🛒

The Monarch Buckle Carrier



The Monarch Carrier - Evergreen
\$129.00



The Monarch Carrier - Houndstooth
\$129.00



The Monarch Carrier - Dream Wash Denim
\$129.00



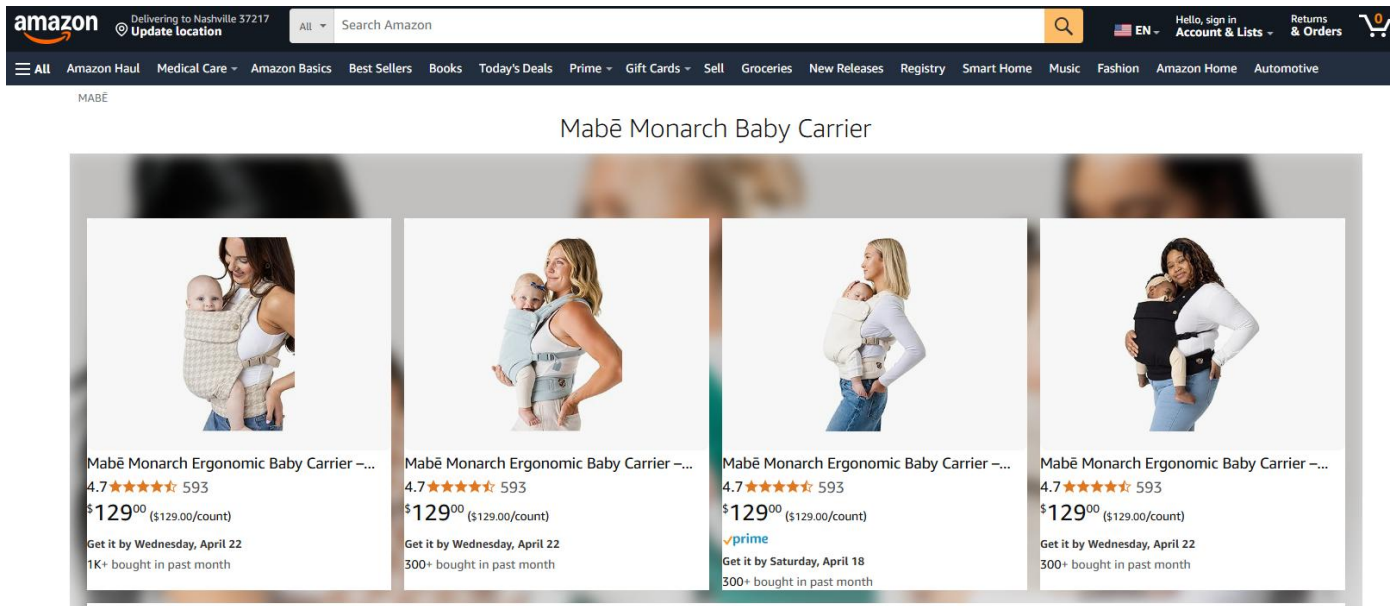
The Monarch Carrier - Ebony Check
\$129.00



The Monarch Carrier - Ebony
\$129.00



The Monarch Carrier - Mocha
\$129.00



GROUP 2 - The Xiamen New Baby Respondents:

Portier USA LLC (“Portier”)

Ava + Oliver LLC

Xiamen New Baby Products Co., Ltd. (“Xiamen New Baby”)

Koi Trading Services Inc. (“Koi Trading”)

Xiamen Danke Health Technology Co., Ltd. a/k/a xiamen danke jiankang keji you xian gong si (“Xiamen Danke”)

Accused Products:

Collectively referred to as the “Accused Portier Carriers”:

Portier

Portier Limitless baby carrier

Collectively referred to as the “Accused Ava & Oliver Carriers”:

Ava & Oliver

Ava & Oliver Essential baby carrier

Collectively referred to as the “Accused Nest Blanche / Zoe Carriers”:

Nest Blanche baby carrier

Nest Blanche Zoe

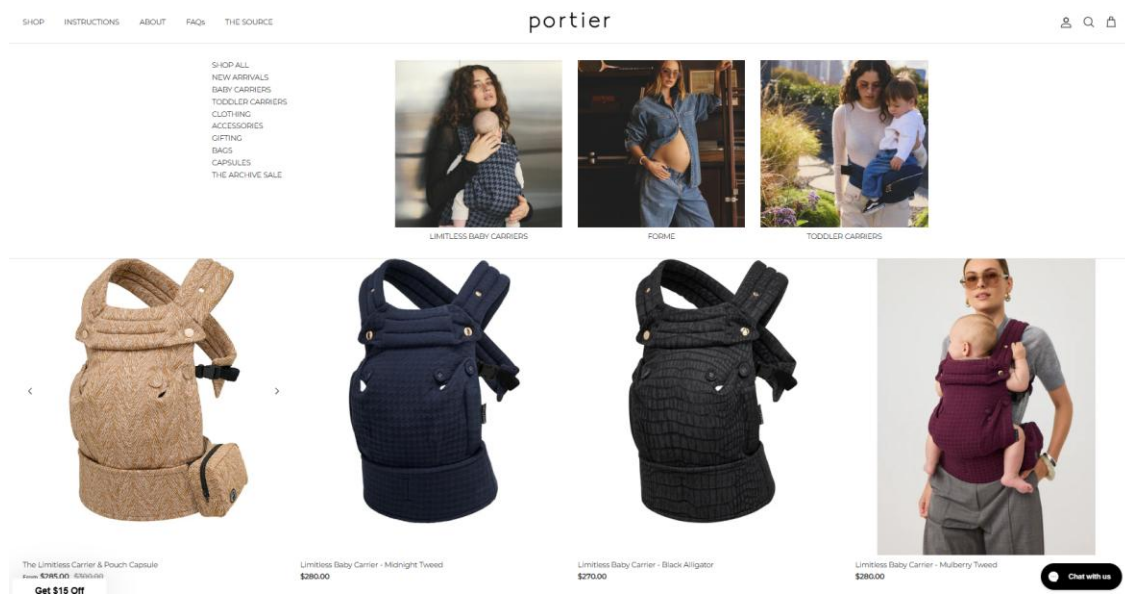
Carrier Zoe

Zoe Carrier

Website(s):

Exemplary websites where the Accused Portier Carriers are available for purchase in the United States:

<https://portier.co/collections/baby-carriers>



THE SOURCE

portier

laby Carrier - Neutral Houndstooth



LIMITLESS BABY CARRIER - NEUTRAL HOUNDSTOOTH

\$280.00

Buy Now, Pay Later [See Options](#)

★★★★★ 386 Reviews

Designed to adapt as your baby grows, with an adjustable fit that supports your child from newborn through to two years old. Offering three ergonomic carry positions: front carry inward facing, front carry outward facing, and back carry. Each one supports healthy hip and spine development while providing lasting comfort for both parent and child. Recognised by the International Hip Dysplasia Institute as a hip-healthy carrier, the ergonomic design provides optimal alignment for your baby and even weight distribution for you.

Neutral Houndstooth features a classic monochrome houndstooth design that pairs effortlessly with any wardrobe. Woven from a breathable blend of 88% cotton and 12% linen, the fabric is lightweight, durable, and designed for everyday use, combining comfort and effortless style for both parent and baby.

An optional [Essentials Pouch](#) slides onto the waistband to keep small necessities close at hand.

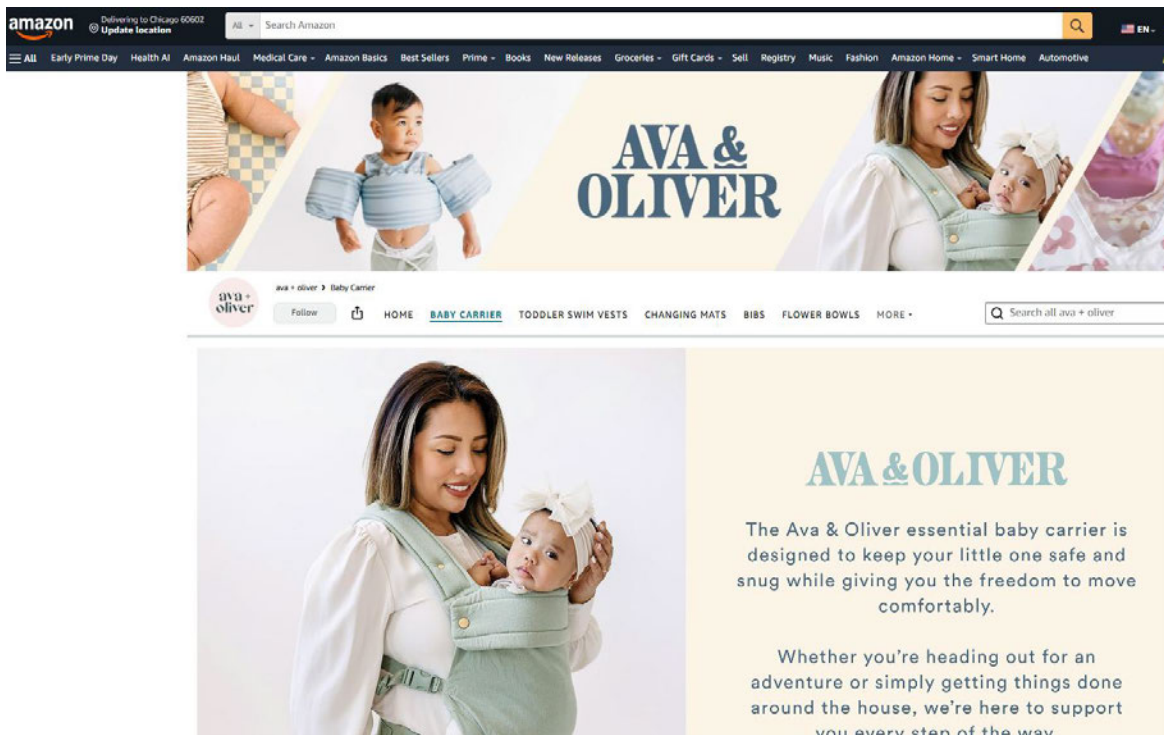
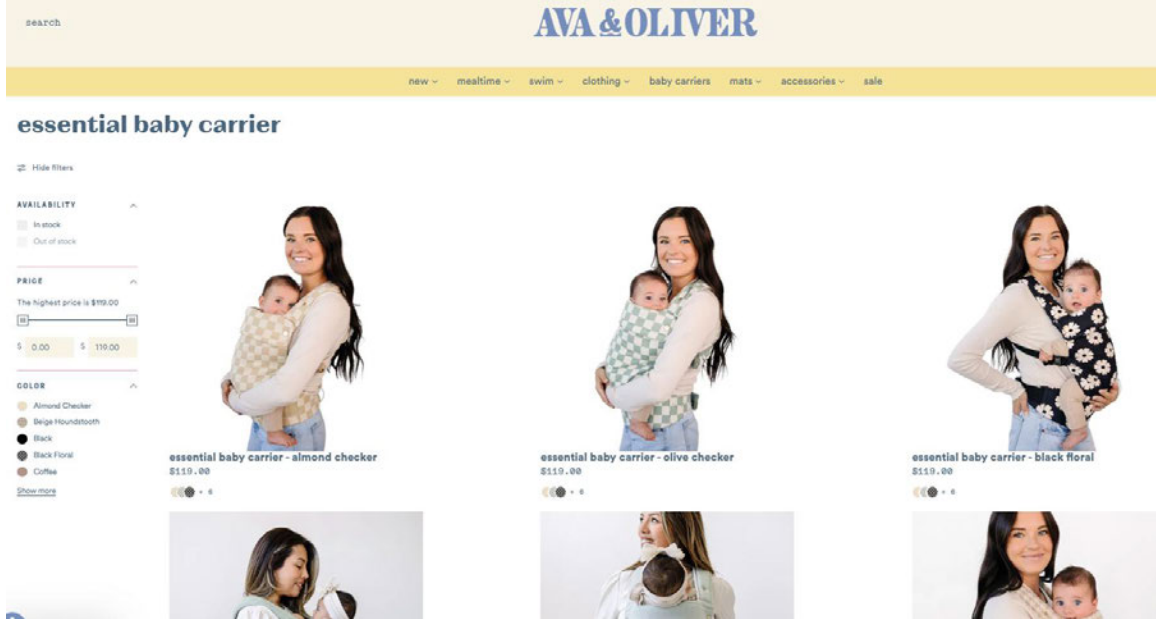
Colour: Neutral Houndstooth



Exemplary websites where the Accused Ava & Oliver Carriers are available for purchase in the United States:

<https://shopavaoliver.com/collections/essential-baby-carrier>

https://www.amazon.com/stores/avaoliver/page/6212586E-87CF-485E-A6D1-B87FFB1CB775?lp_asin=B0FG61T8XK&ref_=ast_bln&store_ref=bl_ast_dp_brandlogo_sto



Exemplary websites where Accused Nest Blanche / Zoe Carriers are available for purchase in the United States:

<https://www.nestblanche.com/>

https://www.amazon.com/Baby-Carrier-Newborn-Toddler-Houndstooth/dp/B0DT4D8C8J/ref=ast_sto_dp_puis?th=1


[Customer Service](#) [Search](#)
DISCOVER YOUR OWN NEST BLANCHE CARRIER
[Shopping Cart](#) [My Wish List](#) [Sign In or Create an Account](#)
[HOME](#) [SHOP](#) [ABOUT US](#) [LEARN](#) [CONTACT](#)
[Home](#) > [Products](#)
CATEGORIES
[All Baby Carrier Series](#)
[Christmas Series](#)
[Denim style](#)
[Houndstooth style](#)
[Teddy velvet style](#)
供货情况
☐ In Stock(13)
☐ Out Of Stock(1)

价格

Price range: \$ 0 to \$ 90

Products

VIEW AS

ITEMS PER PAGE

20

SORT BY

Alphabeti...



NEST BLANCHE
Baby Carrier For Newborn To
Toddler, 7-35 Lbs Weight...

\$39.99


NEST BLANCHE
Baby Carrier For Newborn To
Toddler, 7-35 Lbs Weight...

\$43.99


NEST BLANCHE
Baby Carrier For Newborn To
Toddler, 7-35 Lbs Weight...

\$43.99


NESTBLANCHE.COM
Baby Carrier For Newborns To
Toddlers | Cozy Wrap With...

\$69.99

amazon Delivering to Nashville 37217 [Update location](#) [Baby](#) nest blanche baby carrier [Q](#) [EN](#) [Hello, sign in](#) [Account & Lists](#) [Returns & Orders](#) [Cart](#)

[All](#) [Amazon Haul](#) [Medical Care](#) [Amazon Basics](#) [Best Sellers](#) [Books](#) [Today's Deals](#) [Prime](#) [Gift Cards](#) [Sell](#) [Groceries](#) [New Releases](#) [Registry](#) [Smart Home](#) [Music](#) [Fashion](#) [Amazon Home](#) [Automotive](#)

[Baby](#) [Registry](#) [Best Sellers](#) [Deals](#) [Strollers](#) [Car Seats](#) [Nursery](#) [Feeding](#) [Clothing](#) [Activity & Gear](#) [Toys](#) [Diapering](#) [Health & Safety](#) [Gifts](#)

1-24 of 263 results for "nest blanche baby carrier" [Sort by: Featured](#)

Eligible for Free Shipping
☐ Free Shipping by Amazon
 Get FREE Shipping on eligible orders shipped by Amazon

Delivery Day
☐ Get It Today
☐ Get It by Tomorrow

Customer Reviews

★★★★☆ & Up

Age Range
☐ Birth to 3 Months
☐ 4 to 7 Months
☐ 8 to 11 Months
☐ 12 to 23 Months
☐ 24 Months & Above

Price

\$18 - \$155+

Up to \$25
 \$25 to \$35
 \$35 to \$60
 \$60 to \$200
 \$200 & above


Cherish Life, Nurture Growth.

Sponsored | Top 10 best-selling brand in this category | [Shop NEST BLANCHE](#)


Ergonomic Baby Carrier
Newborn to Toddler, Light...
4.7 ★★★★★ (452)
\$89.99 (\$89.99 / count)
List: \$99.99



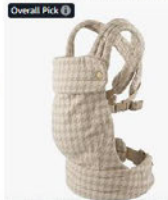
Ergonomic Baby Carrier
Newborn to Toddler, Light...
4.7 ★★★★★ (452)
\$89.99 (\$89.99 / count)



NEST BLANCHE Baby Carrier
- Soft Cotton Linen Blend...
4.5 ★★★★★ (36)
-5% \$85.49 (\$85.49 / count)
\$90.99

Results

Check each product page for other buying options.



GROUP 3 - The Artipoppe Respondents:

Artipoppe B.V. ("Artipoppe")

Bugaboo Xiamen Industrial Co. Ltd. ("Bugaboo Xiamen")

Bugaboo International B.V. ("Bugaboo INTL")

Bugaboo North America, Inc. (“Bugaboo NA”)

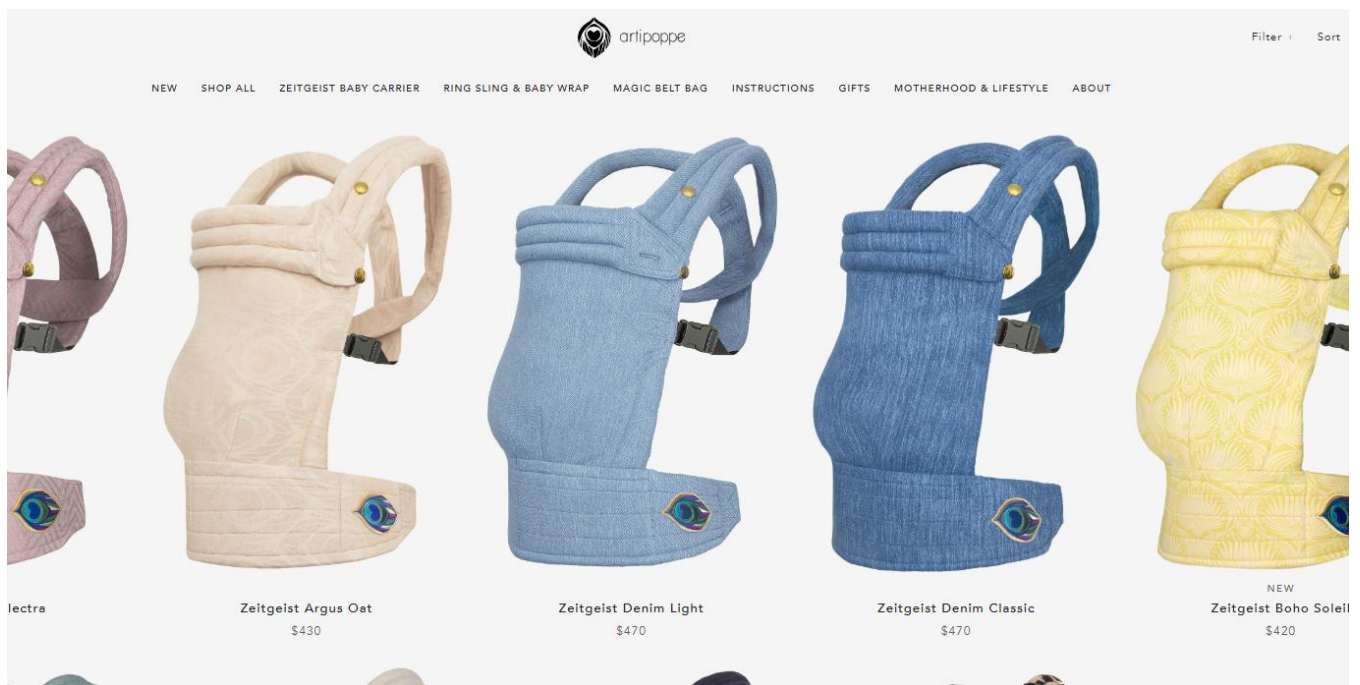
Accused Products (referred to herein as the “Accused Artipoppe Carriers”):

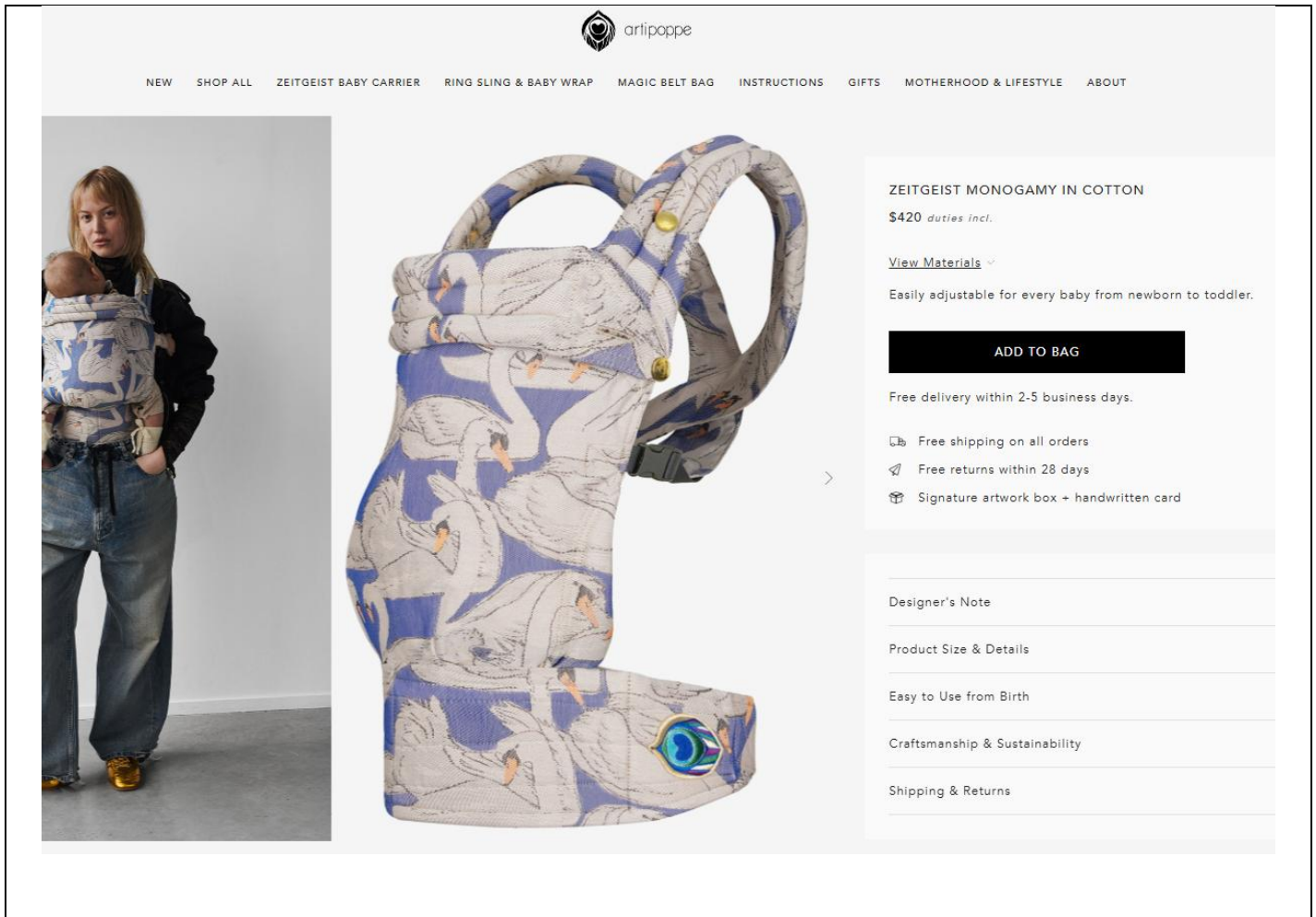
Artipoppe or Zeitgeist baby carrier

Website(s):

Exemplary websites where the Accused Artipoppe Carriers are available for purchase in the United States:

<https://shop.artipoppe.com/baby-carrier/>





10. On information and belief, and as documented in certain 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 after importation into the United States by or on behalf of Respondents.

11. An industry as required by 19 U.S.C. §§ 1337(a)(2) and (3) exists in the United States relating to articles protected by the Asserted Patents. Details on Ergobaby's domestic industry are provided in Section X, below.

12. 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) 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 (c) the complainant requires a trade-based, border-enforcement remedy to prevent the continued U.S. importation and sale of infringing products by its direct competitors.

13. Ergobaby seeks as relief a permanent limited exclusion order prohibiting, *inter alia*, entry into the United States of Respondents' adjustable child carriers and components thereof.

14. Ergobaby 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 adjustable child carriers and components thereof.

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

II. COMPLAINANTS

A. The Ergo Baby Carrier, Inc. ("Ergobaby")

16. Ergobaby is a corporation organized and existing under the laws of the State of Hawaii, having a principal place of business at 19700 South Vermont Avenue, Suite 250, Torrance, California 90502.

17. Ergobaby is a U.S. and worldwide leader in the design and creation of baby carrier products. Ergobaby designs, develops, markets, and sells adjustable child carrier products and components thereof in the United States, including the Omni Family of child carriers.

18. To support its substantial line of consumer products, including the Omni Family of child carriers, Ergobaby (a U.S. headquartered company) presently employs approximately 44 individuals in the United States.

19. As described herein, Ergobaby 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 adjustable child carrier products and components thereof, including the Omni Family of carriers.

20. As a result of these sustained and ongoing investments, Ergobaby has offered and continues to sell at least five different adjustable child carrier products, plus a diverse variety of related accessories and related sling and wrap products, making Ergobaby the top selling brand of baby carriers in the United States, and one of the most recognizable and respected worldwide brands in the industry.

21. Ergobaby exclusively owns the entire right and title to the Asserted Patents.

III. PROPOSED RESPONDENTS

A. Mabe, LLC

22. Proposed Respondent Mabe, LLC (“Mabe”) is an Idaho-domiciled limited liability company with its principal place of business at 1463 N. 825 E, Shelley, Idaho 83274-5055. Upon information and belief, Mabe, among other things, is engaged in the importation into the United States and/or sale after importation of adjustable child carriers and components thereof, including certain of the Accused Products. As discussed *infra*, Mabe, upon information and belief, through various agents (including co-Respondents), manufactures the Accused Products in China. Mabe and/or its agents then import and/or sell after importation the Accused Products.

23. Attached as **Exhibit 8** are true and accurate photographs of an Accused Mabe Carrier, including the labels affixed on the product packaging and on the product itself, which was purchased in the United States through the website Amazon.com on January 7, 2026. These photos indicate that the product was made in China.

24. Attached as **Exhibit 9** are true and accurate copies of the receipt from Amazon.com for the purchase of the Accused Mabe Carrier shown in Exhibit 8.

25. Attached as **Exhibit 10** is a true and accurate copy of the Instruction Manual that was included in the packaging for the Accused Mabe Carrier shown in Exhibit 8.

26. Attached as **Exhibit 11** are true and accurate screenshots taken from Mabe's website (www.mabeproducts.com) taken on May 15, 2026, showing the Accused Mabe Carriers available for purchase online.

B. Quanzhou Baby Nice Infant and Child Products Co., Ltd.

27. Proposed Respondent Quanzhou Baby Nice Infant and Child Products Co., Ltd. ("Quanzhou Baby Nice") is a company organized and existing under the laws of China, having a principal place of business at Cultural Activity Room, Xuhui City Property, No. 777 Songtang Road, Shishi City, Fujian Province, China 362714. Upon information and belief, Quanzhou Baby Nice, among other things, is engaged in the sale for importation into the United States and/or importation of adjustable child carriers and components thereof, including certain of the Accused Products and specifically the Accused Mabe Carriers. Upon information and belief, Quanzhou Baby Nice, through various agents (including co-Respondents), manufactures these products in China, and then sells them for importation and/or facilitates their importation. *See Exhibits 8 & 10* (Photos and images of the Accused Mabe Carriers, associated packaging, and Instruction Manual).

C. Xiamen Funwhale Technology LLC

28. Proposed Respondent Xiamen Funwhale Technology LLC ("Xiamen Funwhale") is a company organized and existing under the laws of China, having a principal place of business at Room 607-2, No. 15 Duiying Road, Jime District, Xiamen City, Fujian Province, China 361000. Upon information and belief, Xiamen Funwhale, among other things, is engaged in the sale for

importation into the United States and/or importation of adjustable child carriers and components thereof, including certain of the Accused Products and specifically the Accused Mabe Carriers. Upon information and belief, Xiamen Funwhale, through various agents (including co-Respondents), manufactures these products in China, and then sells them for importation and/or facilitates their importation. *See Exhibit 8* (Photos and images of Accused Mabe Carriers).

29. Attached as **Exhibit 16** are true and accurate printouts retrieved from ImportGenius.com demonstrating importation of the Accused Mabe Carriers on March 19, 2026, wherein the supplier or consignor of record is Respondent Xiamen Funwhale, and the importer or consignee of record is Respondent Mabe.

30. Attached as **Exhibit 17** is a true and accurate printout retrieved from Descartes Datamyne identifying Respondent Xiamen Funwhale as the shipper of baby carriers to Respondent Mabe as the consignee, with an arrival date of March 19, 2026.

D. Xiamen New Baby Products Co., Ltd.

31. Proposed Respondent Xiamen New Baby Products Co., Ltd. (“Xiamen New Baby”) is a company organized and existing under the laws of China, having a principal place of business at Room 401, No. 361-1 Qiaoying Road, Jimei District, Xiamen, Fujian Province, China 361000. Upon information and belief, Xiamen New Baby, among other things, is engaged in the sale for importation into the United States of adjustable child carriers and components thereof, including certain of the Accused Products and specifically the Accused Portier Carriers, the Accused Ava & Oliver Carriers, and the Accused Nest Blanche / Zoe Carriers. Upon information and belief, Xiamen New Baby, through various agents (including co-Respondents), manufactures these products in China, and then sells them for importation, imports them, and/or facilitates their importation.

PUBLIC VERSION

32. Attached as **Exhibit 12** are true and accurate photographs of an Accused Nest Blanche / Zoe Carrier, including the labels affixed on the product packaging showing contact information for Respondents Koi Trading Services Inc. and Xiamen New Baby and labels on the product itself, which was purchased in the United States through the website www.nestblanche.com on March 23, 2026. These photos indicate that the product was made in China.

33. Attached as **Exhibit 13** are true and accurate copies of the receipts from the website www.nestblanche.com for the purchase of the Accused Nest Blanche / Zoe Carrier shown in Exhibit 12.

34. Attached as **Exhibit 14** is a true and accurate copy of the Instruction Manual that was included in the packaging for the Accused Nest Blanche / Zoe Carrier shown in Exhibit 12.

35. Attached as **Exhibit 15** are true and accurate screenshots taken from Nest Blanche's website (www.nestblanche.com) on May 15, 2026, showing the Accused Nest Blanche / Zoe Carriers available for purchase online.

36. Attached as **Exhibit 18** hereto are true and accurate printouts retrieved from ImportGenius.com demonstrating importation of baby carriers on December 9, 2025, wherein the supplier or consignor of record is Respondent Xiamen New Baby.

37. Attached as **Exhibit 19** are true and accurate printouts retrieved from Descartes Datamyne identifying Respondent Xiamen New Baby as the shipper of baby carriers to entities in the United States, with arrival dates throughout 2025.

38. Nest Blanche appears to be a brand and not a formal legal entity. As such, it is not named as a Respondent in this Complaint. However, in addition to importation and photographic evidence specifically demonstrating that the accused Nest Blanche / Zoe branded products were

made in China and then imported and sold within the United States , there is also information that directly ties the Nest Blanche brand to persons and companies in China.

39. In particular, the Nest Blanche trademark owner is identified as an individual named Haixia, Wei at a physical address located in Fujian Province, China. Further, the Class 018 United States trademark record lists sales@happybebi.com as the correspondence email address.

40. Attached as **Exhibit 20** 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 Nest Blanche is an individual named Haixia Wei with an address in Xiamen City, Fujian Province, China. Further, the Class 018 trademark record lists an email address of sales@happybebi.com.

41. Happybebi is the website for Respondent Xiamen New Baby. Attached as **Exhibit 21** are screenshots taken from the Happybebi website on May 15, 2026.

42. There is also U.S. litigation between Respondents Mabe and Xiamen New Baby that names Xiamen New Baby and “Nest Blanche Team” as related defendants. Attached as **Exhibit 22** is a true and accurate copy of a complaint from a lawsuit filed in the United States District Court for the District of Utah (Case No. 24-742).

43. In sum, Nest Blanche is a brand / trademark tied to Wei Haixia in Xiamen, China, with a clearly established connection to Respondent Xiamen New Baby.

E. Koi Trading Services Inc.

44. Proposed Respondent Koi Trading Services Inc. (“Koi”) is, on information and belief, a company organized and existing under the laws of the United States, with a principal place of business at 516 N. Diamond Bar Boulevard, Suite 366, Diamond Bar, California, 91765. Upon information and belief, Koi, among other things, is engaged in the importation into the United States and/or sale after importation of adjustable child carriers and components thereof, including

certain of the Accused Products and specifically the Accused Nest Blanche / Zoe Carriers. *See Exhibit 12* (Photos and images of Accused Products & associated packaging).

F. Portier USA LLC

45. Proposed Respondent Portier USA LLC (“Portier”) is, on information and belief, a Wyoming company organized and existing under the laws of the United States, with a principal place of business at 30 N. Gould Street, Suite N, Sheridan, Wyoming 82801, and with additional address listed at 1 N. Broadway, Suite 1020, White Plains, New York 10601, 2355 Westwood Boulevard #1889, Los Angeles, California, 90064, and 15101 Santa Ana Avenue, Fontana, California, 92337. Upon information and belief, Portier, among other things, is engaged in the importation into the United States and/or sale after importation of adjustable child carriers and components thereof, including certain of the Accused Products and specifically the Accused Portier Carriers.

46. Attached as **Exhibit 24** are true and accurate photographs of an Accused Portier Carrier, including the labels affixed on the product packaging and on the product itself, which was purchased in the United States directly through the Portier website (www.portier.co) on June 1, 2026. These photos indicate that the product was made in China.

47. Attached as **Exhibit 25** are true and accurate copies of the receipt from the purchase of the Accused Portier Carrier shown in Exhibit 24.

48. Attached as **Exhibit 26** is a true and accurate copy of the Instruction Manual that was included in the packaging for the Accused Portier Carrier shown in Exhibit 24.

49. Attached as **Exhibit 27** are true and accurate screenshots taken from Portier’s website (www.portier.co) on June 9, 2026, showing the Accused Portier Carriers available for purchase online. Also included in Exhibit 27 are true and accurate screenshots taken from the website of the Wyoming Secretary of State showing Portier is a Wyoming Limited Liability

Company with its principal place of business located at 30 N. Gould Street, Suite N, Sheridan, Wyoming 82801.

50. Furthermore, the Accused Portier Carrier are, on information and belief, manufactured in China (through various agents) and/or sold for importation and/or imported by Respondent Xiamen New Baby.

51. Attached as **Exhibit 28** are true and accurate printouts retrieved from Descartes Datamyne identifying Respondent Xiamen New Baby as the shipper of baby carriers to Respondent Portier (as the consignee) in the United States, with arrival dates throughout 2025.

G. Ava + Oliver LLC

52. Proposed Respondent Ava + Oliver LLC (“Ava & Oliver”) is, on information and belief, a Hawaiian company organized and existing under the laws of the United States, with a principal place of business at 3514B Waialae Avenue, Honolulu, Hawaii 96816, and with additional addresses listed at 2855 E. Manoa Road, Suite 105/318, Honolulu, Hawaii, 96822, and 1980 Judd Hillside Road, Honolulu, Hawaii, 96822. Upon information and belief, Ava & Oliver, among other things, is engaged in the importation into the United States and/or sale after importation of adjustable child carriers and components thereof, including certain of the Accused Products and specifically the Accused Ava & Oliver Carrier.

53. Attached as **Exhibit 29** are true and accurate photographs of an Accused Ava & Oliver Carrier, including the labels affixed on the product packaging and on the product itself, which was purchased in the United States through the website Amazon.com on June 1, 2026. The label affixed on the product itself indicates that the product was made in China.

54. Attached as **Exhibit 30** are true and accurate copies of the receipt from the purchase of the Accused Ava & Oliver Carrier shown in Exhibit 29.

55. Attached as **Exhibit 31** is a true and accurate copy of the Instruction Manual that was included in the packaging for the Accused Ava & Oliver Carrier shown in Exhibit 29.

56. Attached as **Exhibit 32** are true and accurate screenshots taken from Ava & Oliver's website (www.shopavaoliver.com) on June 9, 2026, showing the Accused Ava & Oliver Carrier available for purchase online, and taken from the website of the Hawaii Secretary of State showing Ava & Oliver is a Hawaiian Limited Liability Company and its location in Honolulu, Hawaii.

57. Furthermore, the Accused Ava & Oliver Carriers are, on information and belief, manufactured in China (through various agents) and/or sold for importation and/or imported by Respondent Xiamen New Baby.

58. Attached as **Exhibit 33** are true and accurate printouts retrieved from Descartes Datamyne identifying Respondent Xiamen New Baby as the shipper of baby carriers to Respondent Portier (as the consignee) in the United States, with an arrival date in August 2025.

H. Artipoppe B.V.

59. Proposed Respondent Artipoppe B.V. ("Artipoppe") is, on information and belief, a company organized and existing under the laws of the Netherlands, with a principal place of business at Nieuwe Rijksweg 66C, 4128 BN Lexmond, The Netherlands. Upon information and belief, Artipoppe, among other things, is engaged in the importation into the United States of adjustable child carriers and components thereof, including certain of the Accused Products and specifically the Accused Artipoppe Carriers.

60. Attached as **Exhibit 34** are true and accurate photographs of an Accused Artipoppe Carrier, including the labels affixed on the product packaging and on the product itself, which was purchased in the United States directly through the Artipoppe website (www.shop.artipoppe.com) on January 7, 2026. The product label lists Artipoppe and its address in The Netherlands, and

further indicates that the product was designed in The Netherlands and the final product was manufactured in China.

61. Attached as **Exhibit 35** are true and accurate copies of the receipt from the purchase of the Accused Artipoppe Carrier shown in Exhibit 34.

62. Attached as **Exhibit 36** is a true and accurate copy of the Instruction Manual that was included in the packaging for the Accused Artipoppe Carrier shown in Exhibit 34.

63. Attached as **Exhibit 37** are true and accurate screenshots taken from Artipoppe's website (shop.artipoppe.com/baby-carrier/) on June 10, 2026, showing the Accused Artipoppe Carriers available for purchase online in the United States. Also included in Exhibit 37 are true and accurate screenshots (i) from the Terms and Conditions page of Artipoppe's website stating that the "Identity of the company" is Proposed Respondent Bugaboo North America, Inc., and (ii) from the About / Craftsmanship page of Artipoppe's website describing that the design process for the Accused Artipoppe Carriers "begins in the Netherlands," the assembly is "completed in Xiamen, China" at the "facility of Artipoppe's mother company, Bugaboo," and then rigorous quality control is done "one more time at the Artipoppe headquarters in the Netherlands."

I. Bugaboo International B.V.

64. Proposed Respondent Bugaboo International B.V. ("Bugaboo INTL") is a company organized and existing under the laws of The Netherlands, having a principal place of business at Paasheuvelweg 9 a-b, 1105 BE Amsterdam, Zuidoost, The Netherlands. Upon information and belief, Bugaboo INTL is the parent company of Respondents Bugaboo Xiamen Industrial Co. Ltd., Bugaboo North America, Inc. and/or Artipoppe, and, among other things, is engaged in the sale for importation into the United States and/or importation of adjustable child carriers and components thereof, including certain of the Accused Products and specifically the Artipoppe-branded carrier products. Upon information and belief, Bugaboo INTL, through various agents

(including co-Respondents) sells for importation and/or facilitates the importation of the Accused Artipoppe Carriers depicted in Exhibits 34-37, above.

65. Attached as **Exhibit 38** are true and accurate printouts retrieved from Descartes Datamyne demonstrating importation of what appears to be the Accused Artipoppe Carriers and/or similar products under Harmonized Tariff Schedule of the United States (“HTSUS”) Code 6307.90, and identifying Respondent Bugaboo INTL as the shipper of such products to Respondent Bugaboo North America, Inc. (as the consignee) in the United States, with numerous arrival dates throughout 2025.

J. Bugaboo Xiamen Industrial Co. Ltd.

66. Proposed Respondent Bugaboo Xiamen Industrial Co. Ltd. (“Bugaboo Xiamen”) is a company organized and existing under the laws of China, having a principal place of business at No. 49 Haijing South 2 Roadfree TRA, Xiamen, Fujian Province, China 36100. Upon information and belief, Bugaboo Xiamen, among other things, is engaged in the sale for importation into the United States of adjustable child carriers and components thereof, including certain of the Accused Products and specifically the Accused Artipoppe Carriers. Upon information and belief, Bugaboo Xiamen, 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 34-37, above.

67. Attached as **Exhibit 39** are true and accurate printouts retrieved from Descartes Datamyne demonstrating importation of what appears to be the Accused Artipoppe Carriers and/or similar products under HTSUS Code 6307.90, and identifying Respondent Bugaboo Xiamen as the shipper of such products to Respondent Bugaboo North America, Inc. (as the consignee) in the United States, with numerous arrival dates throughout 2025.

K. Bugaboo North America, Inc.

68. Proposed Respondent Bugaboo North America, Inc. (“Bugaboo NA”) 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 37 West 26th Street, 6th Floor, New York, New York 10010. Upon information and belief, Bugaboo NA, among other things, is engaged in the importation into the United States and/or sale after importation of adjustable child carriers and components thereof, including certain of the Accused Products and specifically the Accused Artipoppe Carriers depicted in Exhibits 34-37, above.

69. Attached as **Exhibit 40** are true and accurate printouts retrieved from Descartes Datamyne demonstrating importation of what appears to be the Accused Artipoppe Carriers and/or similar products under HTSUS Code 6307.90, identifying Respondents Bugaboo Xiamen or Bugaboo INTL as the shipper of those products and identifying Bugaboo NA as the importer or consignee of record, with numerous arrival dates throughout 2025³. Also included in Exhibit 40

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

are true and accurate screenshots taken from the website of the California Secretary of State showing Bugaboo NA is a California corporation with its principal place of business located at 37 W. 26th Street, 6th Floor, New York, NY 10010.

L. Xiamen Danke Health Technology Co., Ltd.

70. Proposed Respondent Xiamen Danke Health Technology Co., Ltd. a/k/a xiamen danke jiankang keji you xian gong si (“Xiamen Danke”) is, on information and belief, a company organized and existing under the laws of China, having a principal place of business at 4th Floor, No. 117 Tianfeng Road, Jimei District, Xiamen, Fujian Province, China 361000. This is the same address as Xiamen New Baby. Upon information and belief, Xiamen Danke, among other things, [REDACTED] and is engaged in the sale for importation and/or importation into the United States of adjustable child carriers and components thereof, including certain of the Accused Products and specifically the Accused Nest Blanche / Zoe Carriers, Accused Portier Carriers, and the Accused Ava + Oliver Carrier. Upon information and belief, Xiamen Danke, through various agents (including certain co-Respondents), [REDACTED] these products in China, and then sells them for importation, imports them, and/or facilitates their importation.

71. Xiamen Danke appears to be an affiliated sister company of Xiamen New Baby under common control by Wei Haixia, and is therefore believed to be involved in the manufacture and/or sale for importation of at least the Accused Nest Blanche / Zoe Carriers, Accused Portier Carriers, and the Accused Ava + Oliver Carrier. *See* Section III.D, *supra*.

72. Attached as **Exhibit 43** is a true and accurate copy of a webpage from Qichacha, a leading corporate credit and business information platform in China, showing Xiamen Danke’s address and affiliation with Wei Haixia.

importation, and/or sale after importation of baby carriers, including those sold under the Artipoppe and/or Zeitgeist brands.

73. Attached as **Confidential Exhibit 44** is a true and accurate excerpt from [REDACTED] Responses to Complainant's Second Set of Interrogatories (No. 20), identifying Xiamen Danke as [REDACTED].

74. Attached as **Confidential Exhibit 45** is a true and accurate excerpt from [REDACTED] Responses to Complainant's First Set of Interrogatories (No. 1), identifying all [REDACTED].

75. Exhibit A to [REDACTED] Response to the Complaint and Notice of Investigation also specifically identifies Xiamen Danke as [REDACTED]. See Confidential Exhibit A to [REDACTED] Response to the Complaint and Notice of Investigation, Inv. No. 337-TA-1514, EDIS Doc. No. 893010 (August 27, 2026).

IV. THE ASSERTED PATENTS AND NON-TECHNICAL DESCRIPTION OF THE INVENTIONS⁴

A. Ownership of the Asserted Patents

76. Complainant Ergobaby owns all right and title to the Asserted Patents via assignment from the inventor, Rodney V. Telford. Mr. Telford is a United States citizen and a longtime Ergobaby employee. Certified copies of the assignments for the Asserted Patents are attached as **Exhibits 2A and 2B**.⁵

⁴ 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. Ergobaby 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.

⁵ Pursuant to Commission Rule 210.12, Ergobaby ordered certified copies of all patent related documents (patents, assignments, and prosecution histories) on March 24, 2026, but has

B. U.S. Patent No. 10,426,275 (“the ’275 Patent”)

77. The ’275 Patent, entitled “Adjustable Child Carrier,” issued on October 1, 2019, naming Rodney V. Telford as the inventor. Mr. Telford is a United States citizen and a longtime Ergobaby employee. The ’275 Patent issued from U.S. Patent Application No. 15/337,813, filed October 28, 2016, and claims priority to U.S. Provisional Application No. 62/248,745, filed on October 30, 2015. The ’275 Patent expires on October 28, 2036.

78. A certified copy of the ’275 Patent is attached as **Exhibit 1A**.

79. A certified copy of the prosecution history of the ’275 Patent is attached as **Exhibit 3A**.

80. Copies of each reference cited in the ’275 Patent and its prosecution history are included in **Exhibit 3B**.

81. The ’275 Patent has 20 claims, two of which are independent claims.

82. Ergobaby is asserting at least independent claim 1 and dependent claims 2, 3, 5, 6, 12, 16, and 17.

C. U.S. Patent No. 12,016,470 (“the ’470 Patent”)

83. The ’470 Patent, entitled “Adjustable Child Carrier,” issued on June 25, 2024, naming Rodney V. Telford as the inventor. Mr. Telford is a United States citizen and a longtime Ergobaby employee. The ’470 Patent issued from U.S. Patent Application No. 18/526,378, filed December 1, 2023, and claims priority to U.S. Patent Application No. 15/337,813, filed on October 28, 2016, and U.S. Provisional Application No. 62/248,745, filed on October 30, 2015. The ’470 Patent expires on October 28, 2036.

84. A certified copy of the ’470 Patent is attached as **Exhibit 1B**.

not received them as of the date of this submission. Ergobaby will provide the requisite certified copies to the Commission as soon as it receives them.

85. A certified copy of the prosecution history of the '470 Patent is attached as **Exhibit 3C**.

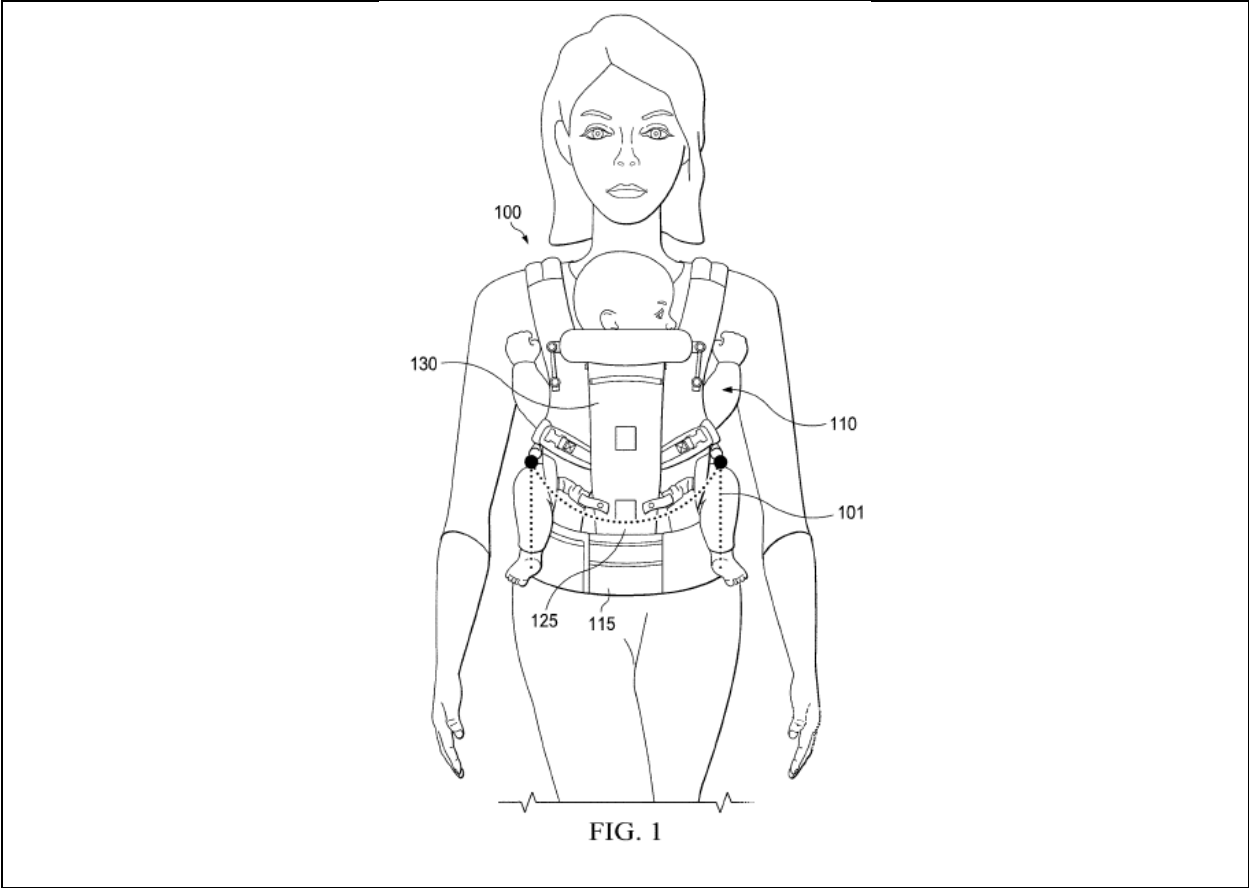
86. Copies of each reference cited in the '470 Patent and its prosecution history are included in **Exhibit 3D**.

87. The '470 Patent has 25 claims, three of which are independent claims.

88. Ergobaby is asserting at least independent claims 1, 8, and 18, and dependent claims 6, 7, 9, 10, 11, 17, 22, 23, 24, and 25.

D. Non-Technical Description of the Inventions

89. The following is a nontechnical description of the Asserted Patents. The Asserted Patents generally disclose a child carrier that is configured to adapt in size and shape as the child grows by allowing the carrier seat to adjust and reposition support, including through changes to the width, depth, and/or length of portions of the carrier. The '275 Patent recites adjustments to the depth and width of the carrier, while the '470 Patent recites adjustments to the length of the carrier, among other things. Through such adjustments, a child may be continuously supported in an ergonomic and natural spread-squat or M-shaped sitting position from the newborn through toddler stages. The following images can be found in some of the common figures from the '275 Patent and '470 Patent.



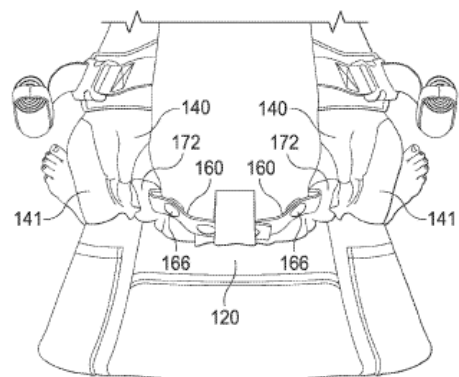


FIG. 5A

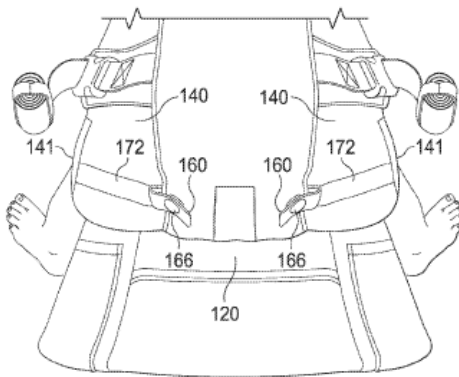


FIG. 5B

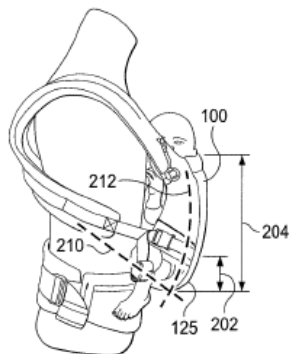


FIG. 6A

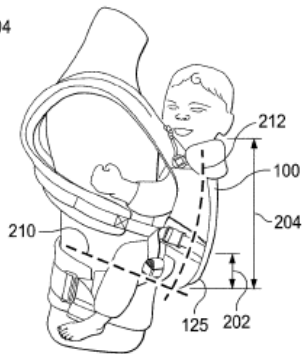


FIG. 6B

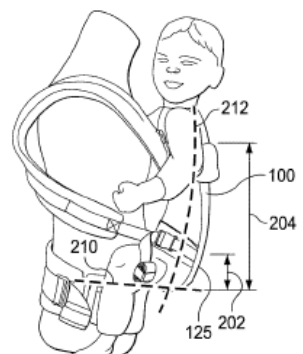


FIG. 6C

90. Prior art carriers suffered from a number of disadvantages, including but not limited to, poor ergonomic positioning resulting in the baby sitting too upright or with weight bearing on the lower spine instead of the baby's thighs and hips, lack of adjustability across a range of settings or required use of external inserts or attachments to accommodate changes to the size and shape of newborns or toddlers. The technology of the Asserted Patents overcame these and other disadvantages.

E. Counterparts of the Asserted Patents

91. Pursuant to 19 C.F.R. § 210.12(a)(9)(v), and to the best of Ergobaby's knowledge, Ergobaby provides below 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 '275 Patent and the '470 Patent, with an indication of the prosecution status of each patent application.

Asserted Patent	Counterpart	Title	Status
U.S. 10,426,275 U.S. 12,016,470	EP 3367849 B1 (Applic. No. 16860977)	ADJUSTABLE CHILD CARRIER	Issued
U.S. 10,426,275 U.S. 12,016,470	KR 10-2325907 B1 (Applic. No. 20207029046)	ADJUSTABLE CHILD CARRIER	Issued
U.S. 10,426,275 U.S. 12,016,470	CN 108697246 B (Applic. No. 201680071536)	ADJUSTABLE CHILD CARRIER	Issued
U.S. 10,426,275 U.S. 12,016,470	JP 6871247 B2 (Applic. No. 2018521974)	ADJUSTABLE CHILD CARRIER	Issued
U.S. 10,426,275 U.S. 12,016,470	CN 113995273 B (Applic. No. 202111280861)	ADJUSTABLE CHILD BACKPACK	Issued
U.S. 10,426,275 U.S. 12,016,470	KR 10-2166510 B1 (Applic. No. 20187015023)	ADJUSTABLE BABY CARRIER	Issued
U.S. 10,426,275 U.S. 12,016,470	EP 4233638 A3 (Publication No.) (Applic. No. 23181194)	ADJUSTABLE CHILD CARRIER	Pending
U.S. 10,426,275 U.S. 12,016,470	JP 7110-269 B2 (Applic. No. 2020060090)	ADJUSTABLE CHILD CARRIER	Issued
U.S. 10,426,275 U.S. 12,016,470	US 29/891,913		Abandoned
U.S. 10,426,275 U.S. 12,016,470	US 2024/0285095 A1 (Applic. No. 18/659,053)	ADJUSTABLE CHILD CARRIER	Pending

U.S. 10,426,275 U.S. 12,016,470	US 2025/0107640 A1 (Applic. No. 18/977,039)	ADJUSTABLE CHILD CARRIER	Pending
U.S. 10,426,275 U.S. 12,016,470	WO 2017075500 A1 (Applic. No. PCT/US16/59534)	ADJUSTABLE CHILD CARRIER	---

F. Licensees Under the Asserted Patents

92. A list of all entities that are licensees to one or both of the Asserted Patents is attached as **CONFIDENTIAL Exhibit 7**.

V. THE TECHNOLOGY AND PRODUCTS AT ISSUE

93. The Accused Products are substantially similar to the DI Products, and there is direct competition in the marketplace between Ergobaby and the Respondents.

94. Ergobaby is committed to being on the leading edge of consumer product innovation in the United States and to delivering meaningful advantages over competitive products throughout the world.

95. As part of that commitment, Ergobaby has spent millions of dollars designing, developing, and improving its adjustable child carrier products and components thereof, including the DI Products.

96. The Asserted Patents are directed to child carriers that include adjustable components that make the carriers adaptable to ergonomically carry a child as the child grows.

97. 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), Ergobaby states that the Accused Products are adjustable child carrier products that contain adjustable components that make the carriers adaptable to ergonomically carry a child as the child grows.

98. Without limiting the scope of the investigation or the products potentially at issue—and based solely upon information and belief as of the date of this Complaint—Ergobaby states

that the Accused Products include (but are not limited to) adjustable child carriers 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 neck supports (recited in the '470 Patent) and replacement parts designed to attach to or integrate with child carriers.

VI. RESPONDENTS' UNLAWFUL AND UNFAIR ACTS

99. As discussed below, the Accused Products are adjustable child carriers and components thereof that infringe the Asserted Patents. The Accused Products are manufactured abroad by or for Respondents, 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. Information regarding representative Accused Products discussed below can be found in **Exhibits 6A through 6D**.

100. Respondents directly infringe at least independent claim 1, and dependent claims 2, 3, 5, 6, 12, 16, and 17 of the '275 Patent with respect to all the Accused Products.

101. Exemplary claim charts showing the infringement of independent claim 1 of the '275 Patent by the Accused Products are attached as **Exhibit 6A (Mabe), Exhibit 6C (Nest Blanche), Exhibit 6E (Portier), Exhibit 6G (Ava & Oliver), and Exhibit 6I (Artipoppe)**.

102. Additionally, Respondents directly infringe at least independent claims 1, 8, and 18, and dependent claims 6, 7, 9, 10, 11, 17, 22, 23, 24, and 25 of the '470 Patent with respect to all the Accused Products.

103. Exemplary claim charts showing infringement of independent claims 1, 8, and 18 of the '470 Patent by the Accused Products are attached as **Exhibit 6B (Mabe), Exhibit 6D (Nest Blanche), Exhibit 6F (Portier), Exhibit 6H (Ava & Oliver), and Exhibit 6J (Artipoppe)**.

104. Respondents directly infringe the Asserted Patents through their manufacture, sale for importation, importation, use, offering to sell, and/or sale after importation of the Accused Products.

VII. SPECIFIC INSTANCES OF UNFAIR IMPORTATION AND SALE

105. Respondents sell the Accused Products for importation into the United States, import them into the United States, and/or sell them after importation into the United States. *See generally* Section III, *supra*.

106. Representative samples of the Accused Products were purchased in the United States from online retailers like Amazon.com and/or directly from the websites of the Respondents, and shipped to the United States and/or sold in the United States after importation. *See* Section III, *supra*, and **Exhibits 8-10, 12-14, 24-26, 29-31, 34-36**.

107. The Accused Products are manufactured abroad and sold for importation into the United States by Respondents, or their authorized agents. For example, the product packaging for, and the product tags on, the Accused Products are all marked as “Made in China” or “Manufactured in China.” *See* Section III, *supra*, and **Exhibits 8, 12, 24, 29, 34**.

108. Upon information and belief, Respondents Quanzhou Baby Nice, Xiamen Funwhale, Xiamen New Baby, Bugaboo Xiamen, and Xiamen Danke manufacture the Accused Products, or cause the Accused Products to be manufactured, at facilities in China. Upon information and belief, Quanzhou Baby Nice, Xiamen Funwhale, Xiamen New Baby, Bugaboo Xiamen, and Xiamen Danke then sell the Accused Products for importation or otherwise facilitate transport of the Accused Products to the United States. *See* Section III, *supra*, and **Exhibits 8, 12, 16-19, 24, 28, 29, 33, 34, 38-40, 43-45**.

109. The Proposed Respondent being added in this Amended Complaint, Xiamen Danke, has been [REDACTED] the Accused Products sold under the Portier

and Ava + Oliver brands, and is believed to be the [REDACTED] of the Accused Nest Blanche Products, as well. *See Exhibits 20, 22, 43-45.*

110. Upon information and belief, the Accused Products are then imported into the United States and/or sold after importation into the United States by or on behalf of Respondents Mabe (under the Mabe brand), Xiamen New Baby and/or Koi Trading Services (under the Nest Blanche / Zoe brands) Xiamen New Baby and/or Portier (under the Portier / Limitless brand) Xiamen New Baby and/or Ava & Oliver (under the Ava & Oliver / Essential brand), and Bugaboo NA (under the Artipoppe / Zeitgeist brand) and/or their respective authorized agents. *See Section III, supra, and Exhibits 8-9, 12-13, 16-19, 24-25, 28-30, 33-35, 38-40.*

111. Upon information and belief, Respondents Mabe (under the Mabe brand), Xiamen New Baby and/or Koi Trading Services (under the Nest Blanche / Zoe brands), Xiamen New Baby and/or Portier (under the Portier / Limitless brand), Xiamen New Baby and/or Ava & Oliver (under the Ava & Oliver / Essential brand), and Bugaboo NA (under the Artipoppe / Zeitgeist brand) directly and/or through their respective authorized agents, sell and offer for sale the Accused Products 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. *See Section III, supra, and Exhibits 8-15, 24-27, 29-32, 34-37.*

VIII. HARMONIZED TARIFF SCHEDULE NUMBERS

112. On 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”): 6307.90.9889 and 9401.71. These numbers are exemplary, and Ergobaby will provide updated HTSUS numbers as they are discovered throughout the course of the investigation.

113. 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

114. Pursuant to 19 C.F.R. § 210.12(a)(5), Ergobaby states that the asserted '275 Patent, which is the subject of this Complaint, has been the subject of prior litigation in the following matters: (1) U.S. District Court for the District of Colorado, *The Ergo Baby Carrier, Inc. v. LILLEbaby, LLC*, Case No. 19-cv-02950, filed on October 16, 2019, and dismissed on May 5, 2020; and (2) U.S. District Court for the Central District of California, *The Ergo Baby Carrier, Inc. v. Brands Four Kids, LLC d/b/a MOBY Wrap*, Case No. 2:19-cv-09325-SJO-SS, filed on October 30, 2019, and dismissed on March 25, 2020; and (3) U.S. District Court for the Western District of Washington, *Hong Kong Lute Technology Co., Ltd. d/b/a Momcozy v. The Ergo Baby Carrier, Inc.*, Case No. 2:24-cv-01649-JNW, filed on October 10, 2024, and dismissed on December 17, 2024. These matters have been concluded and did not include the asserted '470 Patent.

115. Pursuant to 19 C.F.R. § 210.12(a)(5), Ergobaby further states that both Asserted Patents, or the subject matter thereof, which are the subject of this Complaint, are currently the subject of litigation against Respondents Artipoppe, Bugaboo INTL, and Bugaboo NA in the U.S. District Court for the Southern District of New York, *The Ergo Baby Carrier, Inc. v. Bugaboo North America, Inc. et al.*, Case No. 1:26-cv-00315, filed on January 13, 2026. This litigation is currently pending, and alleges infringement of the same Asserted Patents against the same Accused Products being manufactured, imported, or sold for importation into the United States by

Respondents Artipoppe, Bugaboo Xiamen, and Bugaboo INTL, and then offered for sale or sold in the United States by at least Respondent Bugaboo NA.

116. Pursuant to 19 C.F.R. § 210.12(a)(5), Ergobaby further states that both Asserted Patents, or the subject matter thereof, which are the subject of this Complaint, are currently the subject of litigation against Respondent Mabe in the U.S. District Court for the District of Idaho, *The Ergo Baby Carrier, Inc. v. Mabe, LLC*, Case No. 4:26-cv-00022-DCN, filed on January 14, 2026. This litigation is currently pending, and alleges infringement of the same Asserted Patents against the same Accused Products being manufactured, imported, or sold for importation into the United States, and then offered for sale or sold in the United States by Respondents Mabe, Quanzhou Baby Nice, and Xiamen Funwhale.

117. To the best of Ergobaby's knowledge, the Asserted Patents have not been the subject of any other court, agency, or arbitration proceedings.

X. DOMESTIC INDUSTRY

118. An industry as required by Section 337(a)(2) and as defined by Section 337(a)(3) exists in the United States. Ergobaby offers in the U.S. market several adjustable child carriers that embody one or more claims of the Asserted Patents, including the carriers sold within the Omni Family.

119. Ergobaby is a Hawaiian corporation with its principal place of business in Torrance, California. The vast majority of Ergobaby's business activities, including with respect to the DI Products, occur in the United States.

120. Ergobaby has spent millions of dollars in the United States relating to the design, development, manufacture, packaging, distribution, marketing, sale, and customer support of its adjustable child carriers, including carriers within the Omni Family. Ergobaby will continue to spend millions of dollars on these activities in the United States in 2026 and for years to come.

A. Ergobaby's Products Practice of the Asserted Patents

121. **Exhibit 5A** contains a claim chart showing that Ergobaby's Omni Classic baby carrier product practices at least Claim 1 of the '275 Patent.

122. **Exhibit 5B** contains a claim chart showing that Ergobaby's Omni Classic baby carrier product practices at least Claim 1 of the '470 Patent.

123. These charts utilize Ergobaby's Omni Classic baby carrier product as representative of the products in the Omni Family that embody the claims of the Asserted Patents. As stated above, products within the Omni Family are similar from a technical and functionality standpoint, with no differences impacting their embodiment of the claims of the Asserted Patents. Attached as **Exhibit 23** are true and accurate screenshots taken from Ergobaby's website (www.ergobaby.com) on May 15, 2026, showing carriers sold by Ergobaby in the Omni Family, including the Omni Classic baby carrier.

B. Ergobaby's Investments in the United States Relating to Products that Embody the Asserted Patents

124. Ergobaby has made, and continues to make, significant and substantial investments in the United States to create, design, improve, distribute, sell, and support its line of adjustable child carriers, including those within the Omni Family. 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 carrier products practicing claims of the Asserted Patents.

125. Ergobaby's U.S. investments relating to adjustable child carriers 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

126. Ergobaby’s relevant U.S. investments in plant and equipment include, but are not limited to, expenditures on the company’s primary facilities that Ergobaby leases, including rent for such facilities; expenditures on fulfillment and warehousing; and expenditures on a variety of supplies essential to the company’s business, including those needed to develop, test, and manufacture the Omni Family carriers. Ergobaby’s domestic investment in plant and equipment pertaining to the Omni Family carriers is significant.

127. The details of Ergobaby’s U.S. plant and equipment investments relating to the DI Products are described in the Declaration of James Stein, attached hereto as **CONFIDENTIAL Exhibit 4** at ¶¶ 16-21.

2. Significant Employment of Labor and Capital

128. Ergobaby’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 the Omni Family carriers. Ergobaby’s domestic employment of labor and capital pertaining to the Omni Family carriers is significant.

129. The details of Ergobaby’s U.S. employment of labor and capital relating to the DI Products are described in the Declaration of James Stein, attached hereto as **CONFIDENTIAL Exhibit 4** at ¶¶ 16-17, 22-25.

3. Substantial Investments in Engineering, Research, and Development

130. Ergobaby'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 Omni Family of carriers, such as the payment of salaries, benefits and insurance for employees involved in such work; and expenditures directly tied to product development within the Omni Family of carriers, including costs associated with prototypes, testing, and third-party laboratories. Ergobaby's domestic investments in engineering, research, and development pertaining to the Omni Family carriers are substantial.

131. The details of Ergobaby's U.S. substantial investments in engineering and R&D relating to the DI Products are described in the Declaration of James Stein, attached hereto as **CONFIDENTIAL Exhibit 4** at ¶¶ 16-17, 26-29.

XI. REQUEST FOR RELIEF

132. By reason of the foregoing, Ergobaby 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;

PUBLIC VERSION

- 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 Ergobaby 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.

PUBLIC VERSION

Dated (Amended Version):
September 29, 2026

Respectfully submitted,

/s/Beau Jackson

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The Ergo Baby Carrier, Inc.

CERTIFICATE OF SERVICE

I hereby certify that, on September 29, 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	VIA ELECTRONIC FILING [EDIS]
The Honorable Doris Johnson Hines Administrative Law Judge U.S. International Trade Commission 500 E Street, SW Washington, DC 20436	By Email and BOX: johnsonhines1514@usitc.gov
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Koi Trading Services 516 N. Diamond Bar Blvd., Suite 366 Diamond Bar, CA 91765	<i>Via Mail</i>
Ava + Oliver, LLC 3514B Waialae Avenue Honolulu, HI 96816	<i>Via Mail</i>

PUBLIC VERSION

/s/ Roxanne Vorkoeper
Roxanne Vorkoeper
Paralegal
HUSCH BLACKWELL LLP

VERIFICATION OF AMENDED COMPLAINT

I, Petty Rader, hereby declare, in accordance with 19 C.F.R. §§ 210.4 and 210.12(a), as follows:

1. I am the Chief Growth Officer and Chief Legal Officer of The Ergo Baby Carrier, Inc., and I am duly authorized to sign this Amended Complaint;
2. I have read the Amended Complaint and I am aware of its contents;
3. The Amended 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;
4. To the best of my knowledge, information, and belief founded upon reasonable inquiry, the claims and legal contentions of the Amended 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
5. The allegations and other factual contentions made in the Amended 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 16th day of September, 2026.



Petty Rader
Chief Growth Officer and Chief Legal Officer
The Ergo Baby Carrier, Inc.