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VIA EDIS

February 4, 2026

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

Re: ***In the Matter of Certain Vehicle Parts, Components Thereof, and Vehicles Containing Same*, Inv. No. 337-TA-_____**

Dear Secretary Barton:

In accordance with the Commission's Filing Procedures, enclosed for filing on behalf of Complainants General Motors LLC and GM Global Technology Operations LLC ("GM" or "Complainants") are the following documents in support of GM's request that the Commission institute an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337.

Please note that Confidential Exhibits 5.1C and 9.1C contain Confidential Business Information and, pursuant to the Commission's Rules of Practice and Procedure, a request for confidential treatment of the information in those exhibits accompanies this filing. Accordingly, Complainants submit the following:

1. One electronic submission of GM's Complaint and Initial Public Interest Statement, pursuant to 19 C.F.R. §§ 210.8(a)(1)(ii) and 210.8(b);

2. One electronic copy of Confidential Exhibits 5.1C and 9.1C to the Complaint, pursuant to 19 C.F.R. § 210.8(a)(1)(i);

3. One electronic copy of the non-confidential exhibits to the Complaint, pursuant to 19 C.F.R. § 210.8(a)(l)(i), including:

    a. One electronic copy of each asserted United States Design Patent, i.e., U.S. Pat. Nos. D749,997 ("the '997 patent"); D792,815 ("the '815 patent"); D792,816 ("the '816 patent"); D793,301 ("the '301 patent"); D828,247 ("the '247 patent"); D828,248 ("the '248 patent"); D828,256 ("the '256 patent"); D847,703 ("the '703 patent"); D848,318 ("the '318 patent"); D856,874 ("the '874 patent"); D818,406 ("the '406 patent"); D826,114 ("the '114 patent"); D843,025 ("the '025 patent"); D883,155 ("the '155 patent"); D902,807 ("the '807 patent"); D930,533 ("the '533 patent"); D955,939 ("the '939 patent");

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D859,239 ("the '239 patent"); D848,647 ("the '647 patent"); D826,803 ("the '803 patent") (collectively, the "Asserted Patents"), pursuant to 19 C.F.R. § 210.12(a)(9)(i); and

b. One electronic copy of the assignment records for each Asserted Patent, identified as Exhibits 2.1-2.20, pursuant to 19 C.F.R. § 210.12(a)(9)(ii);

4. One electronic copy of the prosecution histories of each of the Asserted Patents, included as Appendices A-T to the Complaint, pursuant to 19 C.F.R. § 201.12(c)(i)[1];

5. One electronic copy of a letter and certification requesting confidential treatment for Confidential Exhibits 5.1C and 9.1C to the Complaint, pursuant to 19 C.F.R. §§ 201.6(b) and 210.5(d).

The requisite paper copies and physical media containing the above will be delivered to the Secretary pursuant to Commission Rule 210.8.

Please contact me with any questions regarding this submission.

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Joseph A. Herriges

Joseph A. Herriges

COUNSEL FOR COMPLAINANTS
GENERAL MOTORS LLC AND
GM GLOBAL TECHNOLOGY OPERATIONS LLC

[1] Complainants have ordered certified copies of the Asserted Patents, assignment records of the Asserted Patents, and prosecution histories of the Asserted Patents with the U.S. Patent & Trademark Office and will supplement the Complaint with those documents upon arrival, pursuant to Commission Rule 210.12(c)(1).

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February 4, 2026

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

Re: ***In the Matter of Certain Vehicle Parts, Components Thereof, and Vehicles Containing Same,*** **Inv. No. 337-TA-_____**

Dear Secretary Barton:

In accordance with 19 C.F.R. §§ 201.6(b) and 210.5, Complainants General Motors LLC and GM Global Technology Operations LLC ("GM" or "Complainants") request confidential treatment for the business information contained in the Confidential Exhibits 5.1C and 9.1C to the Complaint.

The information for which confidential treatment is sought is proprietary commercial information not otherwise publicly available. The Confidential Exhibits to the Complaint consist of:

1. A confidential license agreement (Exhibit 5.1C); and

2. A confidential declaration concerning GM's domestic investments in plant, equipment, labor, and capital related to domestic articles protected by the Asserted Patents (Exhibit 9.1C).[1]

The confidential exhibits described above include information that qualifies as confidential business information pursuant to 19 C.F.R. §201.6(a) because: it is not available to the public; unauthorized disclosure of such information could cause substantial harm to the competitive position of GM; and the disclosure of such information could impair the Commission's ability to obtain information necessary to perform its statutory function.

I declare under penalty of perjury under the laws of the United States of America that, to the best of my knowledge, the foregoing is true and correct.

[1] Exhibit 9.1, which accompanies the complaint, is a public version of the declaration.

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Respectfully submitted,

/s/ Joseph A. Herriges

Joseph A. Herriges

**COUNSEL FOR COMPLAINANTS
GENERAL MOTORS LLC AND
GM GLOBAL TECHNOLOGY OPERATIONS LLC**

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UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C. 20436

In the Matter of **CERTAIN VEHICLE PARTS, COMPONENTS THEREOF, AND VEHICLES CONTAINING SAME**	**Investigation No. 337-TA-_____**

COMPLAINANTS' INITIAL STATEMENT ON THE PUBLIC INTEREST UNDER 19 C.F.R. § 210.8(b)

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Complainants General Motors LLC and GM Global Technology Operations LLC (collectively, "GM") respectfully submit this initial statement on the public interest pursuant to 19 C.F.R. § 210.8(b).

GM is an innovator in vehicle design, and one of the largest employers in the United States. GM has proudly called Detroit its home for over a century, and operates 50 assembly and parts facilities across 19 states that fuel nearly 4,000 dealerships in all 50 states. As part of its operations, GM designs and manufactures vehicles and replacement parts—known as GM Genuine Parts—for those vehicles.

The Accused Products subject to exclusion are aftermarket replacement automotive parts that are designed as copies of patented GM Genuine Parts. The Accused Products are used to replace an original part on a GM vehicle when it is damaged in a collision or otherwise needs replacement. Proposed Respondents have unlawfully imported, sold for importation, and/or sold after importation the Accused Products. GM seeks a general exclusion order or, alternatively a limited exclusion order, along with a cease and desist order.

The Accused Products serve no unique or unmet public health, safety or welfare need. GM has made substantial investments in its manufacturing and distribution operations and can replace the Accused Products with GM genuine, authorized products in a commercially reasonable amount of time. Additionally, consumers have had and will continue to have access to vehicles (and replacement parts for those vehicles) that do not use the Accused Products, such as other GM vehicles or vehicles manufactured by third parties, as well as parts from the robust used parts market.

The requested relief would not adversely impact the public health, safety, or welfare conditions in the United States, competitive conditions in the United States economy, the

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production of like or directly competitive articles in the United States, or United States consumers. Rather, the requested relief would protect GM's investment in the U.S. automotive industry, promote clarity as to the origin of replacement parts, and reduce safety and quality concerns related to aftermarket copy parts.

I. HOW THE ARTICLES SUBJECT TO THE REQUESTED REMEDIAL ORDERS ARE PRESENTLY IMPORTED INTO AND USED IN THE UNITED STATES

GM designs, manufactures, and distributes vehicles, along with replacement parts made by GM and under its direction (GM Genuine Parts) for those vehicles. The Asserted Patents cover the ornamental appearance of vehicle parts that are used on GM vehicles and sold as GM Genuine Parts in the replacement parts market.

When a vehicle is damaged in an accident, consumers generally want to return that vehicle to its pre-accident condition by replacing damaged parts with parts that match the original. In the United States, new replacement parts have two primary sources: Original Equipment Manufacturers, such as GM; and participants in what is known as the replacement parts aftermarket. Buyers of replacement parts can also obtain used parts from a variety of sources, such as salvaged parts and refurbished parts.[1] The Accused Products are new aftermarket replacement parts that copy GM Genuine Parts and infringe one or more of GM's Asserted Patents. Proposed Respondents are manufacturers and distributors who sell for importation, import, and/or sell the Accused Products after importation.

[1] Proposed Respondent LKQ Corporation, for example, participates in the used parts market, amongst other things. *See* Ex. 4.1 at 3 ("We distribute a variety of products to collision and mechanical repair shops, including aftermarket collision and mechanical products; recycled collision and mechanical products; refurbished collision products such as wheels, bumper covers and lights; and remanufactured engines and transmissions.")

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II. THE REQUESTED REMEDIAL ORDERS WILL NOT HARM PUBLIC HEALTH, SAFETY, OR WELFARE

The requested remedial orders would not adversely affect the public health and welfare in the United States. As an initial matter, the Accused Products are not directly related to any public health, safety, or welfare concerns, such as those concerning medical devices, pharmaceuticals, or national security. Further, in the event of exclusion, U.S. consumers would continue to have access to GM Genuine Parts, which GM is capable of supplying to meet demand. Consumers would also continue to have access to used parts. Finally, the Accused Products represent a small portion of the replacement parts market in the United States; in the event of their exclusion, consumers would also still have access to non-infringing parts and vehicles made by third parties.

III. THERE ARE NUMEROUS LIKE OR DIRECTLY COMPETITIVE ARTICLES THAT COULD REPLACE THE ACCUSED PRODUCTS IF EXCLUDED

There are numerous parts that will remain available to replace the Accused Products in the event of exclusion.

First, U.S. consumers would continue to have access to GM Genuine Parts. GM has provided, and continues to provide, consumers with new replacement parts for the relevant vehicles. GM and its authorized suppliers have adequate capacity to increase manufacturing if necessary to replace the Accused Products.

Second, the Accused Products represent only a small portion of the overall replacement parts market in the United States. Similarly, the vehicles on which the Accused Products are used represent only a small portion of the overall vehicle market in the United States. Thus, in the event GM's Requested Relief is granted, consumers will still have access to vehicles (and replacement parts for those vehicles) that do not use the Accused Products.

Finally, in the event of exclusion, consumers will also still have access to the used parts market as an alternative to new GM Genuine Parts.

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IV. THE REQUESTED REMEDIAL ORDERS WILL NOT ADVERSELY IMPACT U.S. CONSUMERS

The requested exclusion and cease-and-desist orders will not adversely impact U.S. consumers. For consumers who have already purchased a GM vehicle using one of the parts-at-issue, they would continue to have access to GM Genuine Parts or used parts. GM can supply the market for GM replacement parts and has adequate capacity, along with its authorized suppliers, to meet any increased demand. Consumers of new vehicles would also continue to have the option to purchase vehicles, whether made by GM or a third party, that do not use the Accused Products. Thus, consumers will not be adversely impacted by the proposed remedies.

V. CONCLUSION

The requested remedial orders raise no public interest concerns, whereas the interest in protecting GM's patent rights, particularly against the Proposed Respondents, is strong. Accordingly, the Commission should issue the requested remedial orders if it determines Proposed Respondents violated Section 337.

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Dated: February 4, 2026

Respectfully submitted,

/s/ Joseph A. Herriges

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UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

In the Matter of **CERTAIN VEHICLE PARTS, COMPONENTS THEREOF, AND VEHICLES CONTAINING SAME**	**Investigation No. 337-TA-_____**

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

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PROPOSED RESPONDENTS:

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DEPO AUTO PARTS IND. CO., LTD.

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LKQ CORPORATION
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MITCHELL INTERNATIONAL, INC.
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1.2	U.S. Design Patent No. 792,815
1.3	U.S. Design Patent No. 792,816
1.4	U.S. Design Patent No. 793,301
1.5	U.S. Design Patent No. 828,247
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1.9	U.S. Design Patent No. 848,318
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1.11	U.S. Design Patent No. 818,406
1.12	U.S. Design Patent No. 826,114
1.13	U.S. Design Patent No. 843,025
1.14	U.S. Design Patent No. 883,155
1.15	U.S. Design Patent No. 902,807
1.16	U.S. Design Patent No. 930,533
1.17	U.S. Design Patent No. 955,939
1.18	U.S. Design Patent No. 859,239
1.19	U.S. Design Patent No. 848,647
1.20	U.S. Design Patent No. 826,803
2.1	Assignment Record for U.S. Design Patent No. 749,997
2.2	Assignment Record for U.S. Design Patent No. 792,815
2.3	Assignment Record for U.S. Design Patent No. 792,816
2.4	Assignment Record for U.S. Design Patent No. 793,301
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2.7	Assignment Record for U.S. Design Patent No. 828 256
2.8	Assignment Record for U.S. Design Patent No. 847,703
2.9	Assignment Record for U.S. Design Patent No. 848,318
2.10	Assignment Record for U.S. Design Patent No. 856,874
2.11	Assignment Record for U.S. Design Patent No. 818,406
2.12	Assignment Record for U.S. Design Patent No. 826,114

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Exhibit	Description
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2.14	Assignment Record for U.S. Design Patent No. 883,155
2.15	Assignment Record for U.S. Design Patent No. 902,807
2.16	Assignment Record for U.S. Design Patent No. 930,533
2.17	Assignment Record for U.S. Design Patent No. 955,939
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2.19	Assignment Record for U.S. Design Patent No. 848,647
2.20	Assignment Record for U.S. Design Patent No. 826,803
3.1	U.S. Operations: Fueling America's Economy | General Motors (https://www.gm.com/company/us-operations)
3.2	GM to invest $4 billion in its U.S. manufacturing plants | General Motors (https://investor.gm.com/news-releases/news-release-details/gm-invest-4-billion-its-us-manufacturing-plants)
3.3	GM US Impact Report
3.4	GM Arlington Assembly celebrates 70th anniversary and its 13 millionth vehicle (https://news.gm.com/home.detail.html/Pages/news/us/en/2024/jul/0726-arlington.html)
3.5	GM Drives Texas: New documentary celebrates Arlington Assembly (https://news.gm.com/home.detail.html/Pages/topic/us/en/2024/nov/1127-arlington.html)
3.6	GM Parts Warranty: Confidence in Every Component | GM Parts (https://www.gmparts.com/warranty)
3.7	GM Davison Road Processing Center (GM Davsion Road Processing Center Google Location)
3.8	GM to invest more than $100 Million in CCA facility (https://news.gm.com/home.detail.html/Pages/news/us/en/2023/apr/0428-cca.html)
4.1	LKQ Corp. 2024 10-K (excerpted)
4.2	Keystone Automotive Industries – LKQ Corp (https://lkqcorp.com/blog/global-presence/brand/keystone-automotive-industries)
4.3	Keystone CA Entity Search Screenshot
4.4	Keystone Automotive Home Page (https://www.keystoneautomotive.com/)
4.5	Illinois SOS Business Entity Search Best Value
4.6	Best Value Home Page (https://www.bestvaluepart.com/)
4.7	Michigan SOS Screenshots QCP
4.8	Aftermarket Auto Body Parts (586) 806-2110 Warren, MI (https://www.qualityautomotivepart.com/)

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Exhibit	Description
4.9	General Motors (GM) (586) 806-2110 Aftermarket Auto Body Parts (248) 565-8721 (https://www.qualityautomotivepart.com/general-motors--gm-.html)
4.10	Michigan SOS Screenshot Power Auto
4.11	Power Auto Parts Home Page (https://www.powerautoparts.com/)
4.12	Power Auto Parts Home Page (https://www.qualityautomotiveparts.com/)
4.13	Power Auto Customer Intake Document
4.14	CCC 2023 10-K
4.15	Mitchell: Leading Tech & Services for P&C Claims Management | Mitchell (https://www.mitchell.com/)
4.16	Tong Yang Consolidated Financial Statement 2025 Q2
4.17	Tong Yang Group (https://www.tyg.com.tw/en/index.html#aboutus)
4.18	Zhao Fai Industrial Co., Ltd. (https://www.yccco.com.tw/index.php?lang=EN)
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4.25	AP Auto Parts Industrial Home Page (http://www.autoparts.com.tw/web_en/home.html)
4.26	AP Auto Parts Industrial Sales (http://www.autoparts.com.tw/web_en/sales.html)
4.27	Seven firms to invest NT$3.4bn in local factories - Taipei Times (https://www.taipeitimes.com/News/biz/archives/2020/07/06/2003739409)
4.28	Auto Power Co., Ltd. (https://www.auto-power.com.tw/en/about/9)
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4.30	About Gordon (https://www.gordon.com.tw/aboutus_en.html)
4.31	ANTRC Industrial Corp. (http://antrc.com.tw/)
4.32	DEPO Auto Parts 2024 Consolidated Financial Statements
4.33	About Us, Depo Auto Parts (https://www.depoautolamp.com/company_en_3.php)
4.34	Depo Maxzone (https://www.maxzone.com/)
4.35	Depo Auto Parts (https://www.depoautolamp.com/index_en.php)
5.1C	Licenses to the Asserted Patents (Confidential)
6.1	Infringement Chart - U.S. Design Patent No. 749,997

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Exhibit	Description
6.2	Infringement Chart - U.S. Design Patent No. 792,815
6.3	Infringement Chart - U.S. Design Patent No. 792,816
6.4	Infringement Chart - U.S. Design Patent No. 793,301
6.5	Infringement Chart - U.S. Design Patent No. 828,247
6.6	Infringement Chart - U.S. Design Patent No. 828,248
6.7	Infringement Chart - U.S. Design Patent No. 828 256
6.8	Infringement Chart - U.S. Design Patent No. 847,703
6.9	Infringement Chart - U.S. Design Patent No. 848,318
6.10	Infringement Chart - U.S. Design Patent No. 856,874
6.11	Infringement Chart - U.S. Design Patent No. 818,406
6.12	Infringement Chart - U.S. Design Patent No. 826,114
6.13	Infringement Chart - U.S. Design Patent No. 843,025
6.14	Infringement Chart - U.S. Design Patent No. 883,155
6.15	Infringement Chart - U.S. Design Patent No. 902,807
6.16	Infringement Chart - U.S. Design Patent No. 930,533
6.17	Infringement Chart - U.S. Design Patent No. 955,939
6.18	Infringement Chart - U.S. Design Patent No. 859,239
6.19	Infringement Chart - U.S. Design Patent No. 848,647
6.20	Infringement Chart - U.S. Design Patent No. 826,803
6.21	Accused Product Photographs (997 LKQ)
6.22	Accused Product Photographs (997 Quality Collision)
6.23	Accused Product Photographs (815 Quality Collision)
6.24	Accused Product Photographs (816 Quality Collision)
6.25	Accused Product Photographs (301 Best Value)
6.26	Accused Product Photographs (301 LKQ)
6.27	Accused Product Photographs (301 Quality Collision)
6.28	Accused Product Photographs (247 Best Value)
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6.31	Accused Product Photographs (248 Best Value)
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6.33	Accused Product Photographs (248 Quality Collision)
6.34	Accused Product Photographs (256 Best Value)
6.35	Accused Product Photographs (256 LKQ)

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6.36	Accused Product Photographs (256 Quality Collision)
6.37	Accused Product Photographs (703 Best Value)
6.38	Accused Product Photographs (703 LKQ)
6.39	Accused Product Photographs (703 Quality Collision)
6.40	Accused Product Photographs (318 Best Value)
6.41	Accused Product Photographs (318 LKQ)
6.42	Accused Product Photographs (318 Quality Collision)
6.43	Accused Product Photographs (874 LKQ)
6.44	Accused Product Photographs (874 Quality Collision)
6.45	Accused Product Photographs (406 LKQ)
6.46	Accused Product Photographs (406 Quality Collision)
6.47	Accused Product Photographs (114 Best Value)
6.48	Accused Product Photographs (114 Quality Collision)
6.49	Accused Product Photographs (025 Best Value)
6.50	Accused Product Photographs (025 LKQ)
6.51	Accused Product Photographs (025 Quality Collision)
6.52	Accused Product Photographs (155 Best Value)
6.53	Accused Product Photographs (155 LKQ)
6.54	Accused Product Photographs (155 Quality Collision)
6.55	Accused Product Photographs (807 Best Value)
6.56	Accused Product Photographs (807 LKQ)
6.57	Accused Product Photographs (807 Quality Collision)
6.58	Accused Product Photographs (533 Best Value)
6.59	Accused Product Photographs (533 LKQ)
6.60	Accused Product Photographs (533 Quality Collision)
6.61	Accused Product Photographs (939 Best Value)
6.62	Accused Product Photographs (939 LKQ)
6.63	Accused Product Photographs (939 Quality Collision)
6.64	Accused Product Photographs (239 Best Value)
6.65	Accused Product Photographs (239 LKQ)
6.66	Accused Product Photographs (239 Quality Collision)
6.67	Accused Product Photographs (647 Best Value)
6.68	Accused Product Photographs (647 LKQ)
6.69	Accused Product Photographs (647 Quality Collision)

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Exhibit	Description
6.70	Accused Product Photographs (803 Best Value)
6.71	Accused Product Photographs (803 LKQ)
6.72	Accused Product Invoices (Best Value)
6.73	Accused Product Invoices (Best Value)
6.74	Accused Product Invoices (Keystone)
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6.77	Excerpts of Panjiva Report Concerning Best Value Auto Body Articles
6.78	Excerpts of Panjiva Report Concerning Best Value Auto Body Articles
6.79	Excerpts of Panjiva Report Concerning Quality Collision Articles
6.80	Excerpts of Panjiva Report Concerning Quality Collision Articles
7.1	CAPA Screenshots for U.S. Design Patent No. 749,997
7.2	CAPA Screenshots for U.S. Design Patent No. 792,815
7.3	CAPA Screenshots for U.S. Design Patent No. 792,816
7.4	CAPA Screenshots for U.S. Design Patent No. 793,301
7.5	CAPA Screenshots for U.S. Design Patent No. 828,247
7.6	CAPA Screenshots for U.S. Design Patent No. 828,248
7.7	CAPA Screenshots for U.S. Design Patent No. 828 256
7.8	CAPA Screenshots for U.S. Design Patent No. 847,703
7.9	CAPA Screenshots for U.S. Design Patent No. 848,318
7.10	CAPA Screenshots for U.S. Design Patent No. 856,874
7.11	CAPA Screenshots for U.S. Design Patent No. 818,406
7.12	CAPA Screenshots for U.S. Design Patent No. 826,114
7.13	CAPA Screenshots for U.S. Design Patent No. 843,025
7.14	CAPA Screenshots for U.S. Design Patent No. 883,155
7.15	CAPA Screenshots for U.S. Design Patent No. 902,807
7.16	CAPA Screenshots for U.S. Design Patent No. 930,533
7.17	CAPA Screenshots for U.S. Design Patent No. 955,939
7.18	CAPA Screenshots for U.S. Design Patent No. 859,239
7.19	CAPA Screenshots for U.S. Design Patent No. 848,647
7.20	CAPA Screenshots for U.S. Design Patent No. 826,803
7.21	Mitchell Screenshots for U.S. Design Patent No. 749,997
7.22	Mitchell Screenshots for U.S. Design Patent No. 792,815
7.23	Mitchell Screenshots for U.S. Design Patent No. 792,816

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Exhibit	Description
7.24	Mitchell Screenshots for U.S. Design Patent No. 793,301
7.25	Mitchell Screenshots for U.S. Design Patent No. 828,247
7.26	Mitchell Screenshots for U.S. Design Patent No. 828,248
7.27	Mitchell Screenshots for U.S. Design Patent No. 828 256
7.28	Mitchell Screenshots for U.S. Design Patent No. 847,703
7.29	Mitchell Screenshots for U.S. Design Patent No. 848,318
7.30	Mitchell Screenshots for U.S. Design Patent No. 856,874
7.31	Mitchell Screenshots for U.S. Design Patent No. 818,406
7.32	Mitchell Screenshots for U.S. Design Patent No. 826,114
7.33	Mitchell Screenshots for U.S. Design Patent No. 843,025
7.34	Mitchell Screenshots for U.S. Design Patent No. 883,155
7.35	Mitchell Screenshots for U.S. Design Patent No. 902,807
7.36	Mitchell Screenshots for U.S. Design Patent No. 930,533
7.37	Mitchell Screenshots for U.S. Design Patent No. 859,239
7.38	Mitchell Screenshots for U.S. Design Patent No. 848,647
7.39	Mitchell Screenshots for U.S. Design Patent No. 826,803
8.1	DI Chart - U.S. Design Patent No. 749,997
8.2	DI Chart - U.S. Design Patent No. 792,815
8.3	DI Chart - U.S. Design Patent No. 792,816
8.4	DI Chart - U.S. Design Patent No. 793,301
8.5	DI Chart - U.S. Design Patent No. 828,247
8.6	DI Chart - U.S. Design Patent No. 828,248
8.7	DI Chart - U.S. Design Patent No. 828 256
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8.16	DI Chart - U.S. Design Patent No. 930,533
8.17	DI Chart - U.S. Design Patent No. 955,939
8.18	DI Chart - U.S. Design Patent No. 859,239

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Exhibit	Description
8.19	DI Chart - U.S. Design Patent No. 848,647
8.20	DI Chart - U.S. Design Patent No. 826,803
8.21	The 2019 Chevrolet Colorado Gets New RST and Trail Runner Packages (https://www.caranddriver.com/news/a24892725/2019-chevy-colorado-rst-trail-runner-packages/)
8.22	2016 Chevrolet Silverado 1500 – First Drive Review (https://www.caranddriver.com/photos/g15291494/2016-chevrolet-silverado-1500-first-drive-review-gallery/)
8.23	2019 Chevrolet Silverado 1500 Review, Pricing, and Specs (https://www.caranddriver.com/chevrolet/silverado-1500-2019)
8.24	Photos of the 2022 Chevrolet Silverado (https://www.caranddriver.com/photos/g37517128/2022-chevrolet-silverado-revealed-gallery/)
8.25	Photos of the 2022 GMC Sierra 1500 AT4X / Denali Ultimate (https://www.caranddriver.com/photos/g39944125/2022-gmc-sierra-1500-denali-ultimate-at4x-drive-gallery/)
8.26	2021 Chevrolet Traverse Review, Pricing, and Specs (https://www.caranddriver.com/chevrolet/traverse-2021)
8.27	2022 Chevrolet Silverado 1500 Review, Pricing, and Specs (https://www.caranddriver.com/chevrolet/silverado-1500-2022)
8.28	Photos of the 2022 Chevrolet Traverse (https://www.caranddriver.com/photos/g31445085/2021-chevrolet-traverse-photos-info-gallery/)
8.29	2025 Chevrolet Malibu Review, Pricing, and Specs (https://www.caranddriver.com/chevrolet/malibu)
8.30	Photos of the 2019 Chevrolet Malibu RS (https://www.caranddriver.com/photos/g22835437/2019-chevrolet-malibu-rs-cvt-driven-gallery/)
8.31	2026 GMC Yukon Overview (https://www.gmc.com/suvs/yukon)
8.32	The New 2025 Chevy Tahoe: Full-Size SUV | Chevrolet (https://www.chevrolet.com/suvs/previous-year/tahoe)
8.33	2026 GMC Sierra 1500 | Pickup Truck | GMC (https://www.gmc.com/trucks/sierra/1500)
8.34	DI Product Photographs - U.S. Design Patent No. 749,997
8.35	DI Product Photographs - U.S. Design Patent No. 792,815
8.36	DI Product Photographs - U.S. Design Patent No. 792,816
8.37	DI Product Photographs - U.S. Design Patent No. 793,301
8.38	DI Product Photographs - U.S. Design Patent No. 828,247

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Exhibit	Description
8.39	DI Product Photographs - U.S. Design Patent No. 828,248
8.40	DI Product Photographs - U.S. Design Patent No. 828 256
8.41	DI Product Photographs - U.S. Design Patent No. 847,703
8.42	DI Product Photographs - U.S. Design Patent No. 848,318
8.43	DI Product Photographs - U.S. Design Patent No. 856,874
8.44	DI Product Photographs - U.S. Design Patent No. 818,406
8.45	DI Product Photographs - U.S. Design Patent No. 826,114
8.46	DI Product Photographs - U.S. Design Patent No. 843,025
8.47	DI Product Photographs - U.S. Design Patent No. 883,155
8.48	DI Product Photographs - U.S. Design Patent No. 902,807
8.49	DI Product Photographs - U.S. Design Patent No. 930,533
8.50	DI Product Photographs - U.S. Design Patent No. 955,939
8.51	DI Product Photographs - U.S. Design Patent No. 859,239
8.52	DI Product Photographs - U.S. Design Patent No. 848,647
8.53	DI Product Photographs - U.S. Design Patent No. 826,803
9.1C	Declaration of Dante Valenzuela (Confidential)
9.1	Declaration of Dante Valenzuela (Public)
10.1	LKQ Online Searchable Catalog (www.lkqonline.com)
10.2	LKQ Online Catalog listing for GM1103180DSC (https://lkqonline.com/2015-chevrolet-colorado-rear-bumper-cover/-hXDFjmncn4j/-p001-GM1103180DSC)
10.3	Screenshots of Amazon activity related to the Protected Parts

Appendix	Description
A.	Prosecution History – U.S. Design Patent No. 749,997
B.	Prosecution History – U.S. Design Patent No. 792,815
C.	Prosecution History – U.S. Design Patent No. 792,816
D.	Prosecution History – U.S. Design Patent No. 793,301
E.	Prosecution History – U.S. Design Patent No. 828,247
F.	Prosecution History – U.S. Design Patent No. 828,248
G.	Prosecution History – U.S. Design Patent No. 828 256
H.	Prosecution History – U.S. Design Patent No. 847,703
I.	Prosecution History – U.S. Design Patent No. 848,318
J.	Prosecution History – U.S. Design Patent No. 856,874
K.	Prosecution History – U.S. Design Patent No. 818,406

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L.	Prosecution History – U.S. Design Patent No. 826,114
M.	Prosecution History – U.S. Design Patent No. 843,025
N.	Prosecution History – U.S. Design Patent No. 883,155
O.	Prosecution History – U.S. Design Patent No. 902,807
P.	Prosecution History – U.S. Design Patent No. 930,533
Q.	Prosecution History – U.S. Design Patent No. 955,939
R.	Prosecution History – U.S. Design Patent No. 859,239
S.	Prosecution History – U.S. Design Patent No. 848,647
T.	Prosecution History – U.S. Design Patent No. 826,803

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I. INTRODUCTION

1. Complainants General Motors LLC ("GM LLC") and GM Global Technology Operations LLC ("GM GTO") (GM LLC and GM GTO are collectively referred to as "GM") respectfully request that the United States International Trade Commission institute an investigation pursuant to section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337, based unlawful importation into the United States, sale for importation into the United States, and/or sale within the United States after importation, by the Proposed Respondents (as identified below) of certain vehicle parts, components thereof, and vehicles containing same, that infringe one or more of the following United States design patents: D749,997 ("the '997 patent"); D792,815 ("the '815 patent"); D792,816 ("the '816 patent"); D793,301 ("the '301 patent"); D828,247 ("the '247 patent"); D828,248 ("the '248 patent"); D828,256 ("the '256 patent"); D847,703 ("the '703 patent"); D848,318 ("the '318 patent"); D856,874 ("the '874 patent"); D818,406 ("the '406 patent"); D826,114 ("the '114 patent"); D843,025 ("the '025 patent"); D883,155 ("the '155 patent"); D902,807 ("the '807 patent"); D930,533 ("the '533 patent"); D955,939 ("the '939 patent"); D859,239 ("the '239 patent"); D848,647 ("the '647 patent"); D826,803 ("the '803 patent") (collectively, the "Asserted Patents").

2. GM owns all rights, title, and interest in each of the Asserted Patents. Copies of the Asserted Patents are attached as Exhibits 1.1-1.20, copies of the Asserted Patents' prosecution histories are attached as Appendices A-T, copies of the Asserted Patents' assignment records are attached as Exhibits 2.1-2.20.

3. The Proposed Respondents are: AP Auto Parts Industrial Ltd. ("AP"); ANTRC Industrial Corp. ("ANTRC"); Auto Power Co., Ltd. ("Auto Power"); Best Value Auto Body Supply ("Best Value"); CCC Intelligent Solutions Holdings Inc. and CCC Intelligent Solutions Inc. (collectively, "CCC"); DEPO Auto Parts Ind., Co., Ltd. ("DEPO Auto Parts") and Maxzone

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Vehicle Lighting Corp. ("Maxzone") (collectively, "DEPO Group"); Forerunner Automotive Industrial Corp ("Forerunner"); Gordon Auto Body Parts Co., Ltd. ("Gordon"); Grand HC Auto Tooling Corp. ("Grand HC"); Jiangsu Srumto Auto Parts Co., Ltd. ("Srumto"); LKQ Corporation ("LKQ Corp.") and Keystone Automotive Industries, Inc. ("Keystone") (collectively, "LKQ"); Mitchell International, Inc. ("Mitchell"); Pro Fortune Industrial Co., Ltd. ("Pro Fortune"); Quality Collision Parts, Inc. ("QCP") and Power Auto Parts, Inc. ("Power Auto") (collectively, "Quality Collision"); Tong Yang Industry Co., Ltd. ("Tong Yang") and its subsidiaries (collectively, "TYG"); and Y.C.C. Parts Mfg. Co. Ltd. ("YCC").

4. Pursuant to Commission Rule 210.12(a)(12), the products at issue are vehicles, such as sports-utility vehicles, trucks, and sedans, part used in said vehicles, and components of those parts. The Accused Products include "vehicle parts that replicate parts on certain GM vehicles," e.g., the Protected Parts and Protected Vehicles described *infra*.

5. The Accused Products and the Proposed Respondents infringe, directly and/or indirectly, one or more Asserted Patents in violation of Section 337 and 35 U.S.C. § 271. The following table further describes, for each Asserted Patent, the Accused Products, the type of protected part in various protected GM vehicles, and the Proposed Respondents presently accused of infringing the sole claim of each identified design patent:

Asserted Patent	**Protected Vehicle**	**Accused/Protected Part**	**Presently Accused Respondents**
D749,997	2015-22 Chevrolet Colorado	Rear Bumper	LKQ Quality Collision CCC Mitchell Grand HC Srumto

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Asserted Patent	Protected Vehicle	Accused/Protected Part	Presently Accused Respondents
D792,815	2016-19 Chevrolet Silverado	Front Bumper	LKQ Quality Collision CCC Mitchell Auto Power
D792,816	2016-19 Chevrolet Silverado	Front Bumper	LKQ Quality Collision CCC Mitchell Auto Power
D793,301	2016-19 Chevrolet Silverado	Front Lower Fascia	LKQ Best Value Quality Collision CCC Mitchell Pro Fortune TYG
D828,247	2019-26 Chevrolet Silverado	Hood	LKQ Best Value Quality Collision CCC Mitchell AP Gordon TYG
D828,248	2019-26 GMC Sierra	Hood	LKQ Best Value Quality Collision CCC Mitchell TYG
D828,256	2019-26 GMC Sierra	Fender	LKQ Best Value Quality Collision CCC Mitchell TYG

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Asserted Patent	Protected Vehicle	Accused/Protected Part	Presently Accused Respondents
D847,703	2019-26 Chevrolet Silverado	Rear Bumper	LKQ Best Value Quality Collision CCC Mitchell Forerunner Grand HC Srumto
D848,318	2018-21 Chevrolet Traverse	Front Upper Bumper Fascia	LKQ Best Value Quality Collision CCC Mitchell TYG YCC Srumto
D856,874	2019-22 Chevrolet Silverado	Bumper Bar	LKQ Quality Collision CCC Mitchell Grand HC
D818,406	2018-24 Chevrolet Traverse	Front Fender	LKQ Quality Collision CCC Mitchell Gordon TYG
D826,114	2019-25 Chevrolet Malibu	Front Bumper	LKQ Best Value Quality Collision CCC Mitchell ANTRC Pro Fortune

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Asserted Patent	Protected Vehicle	Accused/Protected Part	Presently Accused Respondents
D843,025	2019-25 Chevrolet Malibu	Front Headlamp	LKQ Quality Collision CCC Mitchell DEPO Group
D883,155	2021-26 GMC Yukon/Yukon XL	Fender	LKQ Best Value Quality Collision CCC Mitchell Gordon
D902,807	2021-26 Chevrolet Tahoe	Hood	LKQ Best Value Quality Collision CCC Mitchell Gordon Srumto
D930,533	2021-26 Chevrolet Tahoe	Front Fender	LKQ Best Value Quality Collision CCC Mitchell Gordon
D955,939	2022-26 GMC Sierra	Front Bumper	LKQ Best Value Quality Collision CCC Grand HC
D859,239	2019-26 GMC Sierra	Rear Bumper	LKQ Best Value Quality Collision CCC Mitchell Forerunner Grand HC Srumto

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Asserted Patent	Protected Vehicle	Accused/Protected Part	Presently Accused Respondents
D848,647	2019-22 Chevrolet Silverado	Front Headlamp	LKQ Best Value CCC Mitchell Quality Collision DEPO Group Srumto
D826,803	2019-25 Chevrolet Malibu	Front Lower Bumper Fascia	LKQ Best Value CCC Mitchell ANTRC Pro Fortune

6. Without discovery, GM cannot exhaustively identify all products imported into the United States, sold for importation into the United States, and/or sold within the United States after importation that infringe the Asserted Patents. Discovery may therefore reveal additional infringing products, infringing components, and/or foreign manufacturers.

7. As required by 19 U.S.C. § 1337(a)(2) and (3), an industry in the United States relating to articles protected by the Asserted Patents exists or is in the process of being established, at least by virtue of GM's significant investments in plant and equipment, significant employment of labor and capital, and/or substantial investment in exploitation through engineering and research and development. Further information is provided in the Confidential Declaration of Dante Valenzuela that is attached to this Complaint as Confidential Exhibit 9.1C. Claim charts demonstrating how GM's articles practice the designs claimed in the Asserted Patents are attached as Exhibits 8.1 to 8.20.

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8. Upon information and belief, the Proposed Respondents will not stop infringing GM's patents without a judicial order. Likewise, upon information and belief, entities other than the Proposed Respondents will continue to supply infringing products absent a judicial order.

9. Thus, GM is seeking (i) a permanent general exclusion order that excludes all vehicle parts, components thereof, and vehicles containing same, from any source, that infringe the Asserted Patents; (ii) a limited exclusion orders that exclude all vehicle parts, components thereof, and vehicles containing same, found to infringe one or more of the Asserted Patents, directed to Proposed Respondents found to have violated Section 337; (iii) cease and desist orders prohibiting certain Proposed Respondents and their affiliates from, among other things, distributing, offering for sale, promoting, marketing, advertising, testing, demonstrating, warehousing inventory for distribution, soliciting of sales, repairing, maintaining, using, transferring, and performing other commercial activities relating to the Accused Products in the United States; (iv) the imposition of a bond on importation and sales of Accused Products during the Presidential Review Period pursuant to 19 U.S.C. § 1337(j); and (v) any other relief that the Commission deems appropriate.

II. THE PARTIES

A. Complainants

10. Complainant General Motors LLC ("GM LLC") is a Delaware limited liability company with a place of business at 300 Renaissance Center, Detroit, MI, 48265. GM LLC is a licensee to the Asserted Patents, and is responsible for manufacturing, among other things.

11. Complainant GM Global Technology Operations LLC ("GM GTO") is a Delaware limited liability company with a place of business located at 300 Renaissance Center, Detroit, MI 48265. GM GTO is the assignee of the Asserted Patents, and is responsible for managing, protecting, and advancing the company's intellectual property.

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12. Headquartered in Detroit, Michigan for over a century, GM leads the industry in customer loyalty, has led the industry in market share over the last three years, and led American vehicle sales in 2024. *See* Exhibit 3.1.

13. GM, along with its authorized partners, proudly manufactures parts and assembles vehicles in the United States. GM operates seven technical centers in six states and over 40 assembly and parts facilities in 19 states. GM supports nearly 4,000 dealerships in all 50 states, which sell GM vehicles and provide service for GM vehicles. *See* Exhibit 3.1. In addition to its significant existing investments in the United States, GM has publicly announced plans to invest about $4 billion over the next two years in its domestic manufacturing plants to increase United States production. *See* Exhibit 3.2. With these investments, GM will have the ability to assemble more than two million vehicles per year in the United States. *Id.*

14. GM is one of the nation's largest employers and job creators. GM directly employs nearly 100,000 hourly and salaried workers, accounting for nearly 10% of the automotive manufacturing labor force in the United States. *See* Exhibit 3.3. Beyond that, its GM dealerships and service centers further employ 228,000 individuals. GM's activities across the United States indirectly support nearly 1,000,000 American jobs.

15. GM customers expect to use their vehicles for many years. As such, GM's Customer Care & Aftersales ("CCA") division provides ongoing support to GM's customers. It oversees the manufacture of high-quality Original Equipment Manufacturer ("OEM") replacement parts, and it facilitates the distribution, sale, and ultimate installation of these service parts onto American consumer vehicles.

B. Proposed Respondents

16. Proposed Respondents fall into three general categories: (1) Distributor Respondents who sell Accused Products to consumers and end users; (2) Purchasing Platform

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Respondents who provide a platform selling and/or offering the Accused Products for sale in the United States; and (3) Manufacturing Respondents who make the Accused Products. Discovery may show various vertical or horizontal relationships among the Proposed Respondents and/or with their affiliates.

1. Distributor Respondents

i. LKQ Respondents

17. Proposed Respondent LKQ Corporation ("LKQ Corp.") and Proposed Respondent Keystone Automotive Industries, Inc. ("Keystone") are affiliates: Keystone is a wholly owned subsidiary of LKQ Corp. *See* Exhibits 4.1; 4.2. This Complaint refers to LKQ Corp. and Keystone collectively as "LKQ."

18. LKQ Corp. is a Delaware corporation with a place of business in Antioch, TN. *See* Exhibit 4.1. LKQ Corp. imports into the United States, sells for importation into the United States, and/or sells in the United States after importation aftermarket automotive body parts. For example, LKQ Corp. purchases products from manufacturers in Taiwan and sells those products in the United States. LKQ explains:

> The aftermarket products we distribute are purchased from independent manufacturers and distributors located primarily in North America and Asia, principally in Taiwan. . . . We purchased approximately 56% of our aftermarket products in 2024 from vendors located in the U.S.; however, we believe the majority of these products were manufactured in Taiwan, Mexico or other foreign countries, with the remaining aftermarket products being purchased directly from manufacturers in Taiwan and other Asian countries.

See Exhibit 4.1 (excerpted) at 5.

19. Keystone is a California corporation, with a place of business in Antioch, TN. *See* Exhibit 4.3. Keystone advertises that it is the largest aftermarket automotive parts supplier in the United States. *See* Exhibit 4.2. On information and belief, Keystone, alone or in concert with LKQ Corp., imports into the United States, sells for importation into the United States, and/or sells

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in the United States after importation aftermarket automotive body parts. For example, Keystone explains that "[t]he automotive aftermarket is the largest market serviced by Keystone, encompassing all parts and accessories for replacement, appearance, comfort, convenience, safety, protection and performance for nearly all car and truck makes and models." *See* Exhibit 4.4.

20. LKQ's infringing products include those manufactured by TYG, Pro Fortune, Gordon, Grand HC, YCC, and DEPO Group, among others, and have been imported into the United States, sold for importation into the United States, and/or sold in the United States after importation. *See infra* Section IV.

21. On information and belief, by virtue of running an automotive parts distribution business, LKQ maintains a commercially significant amount of inventory of each Accused Product in the United States.

ii. Best Value Auto Autobody Supply Inc.

22. Proposed Respondent Best Value Autobody Supply Inc. ("Best Value") is an Illinois corporation with a place of business in Melrose Park, IL. *See* Exhibit 4.5.

23. Best Value sells aftermarket automotive parts. Best Value describes itself as the "House of Aftermarket Auto Parts" and advertises that it keeps "[o]ver 110,000 different OEM replacement parts available in stock." *See* Exhibit 4.6. On information and belief, Best Value imports into the United States and/or sells in the United States after importation aftermarket automotive body parts, allowing Best Value to sell a variety of automotive parts, including hoods, bumpers, grills, and other automotive body parts:

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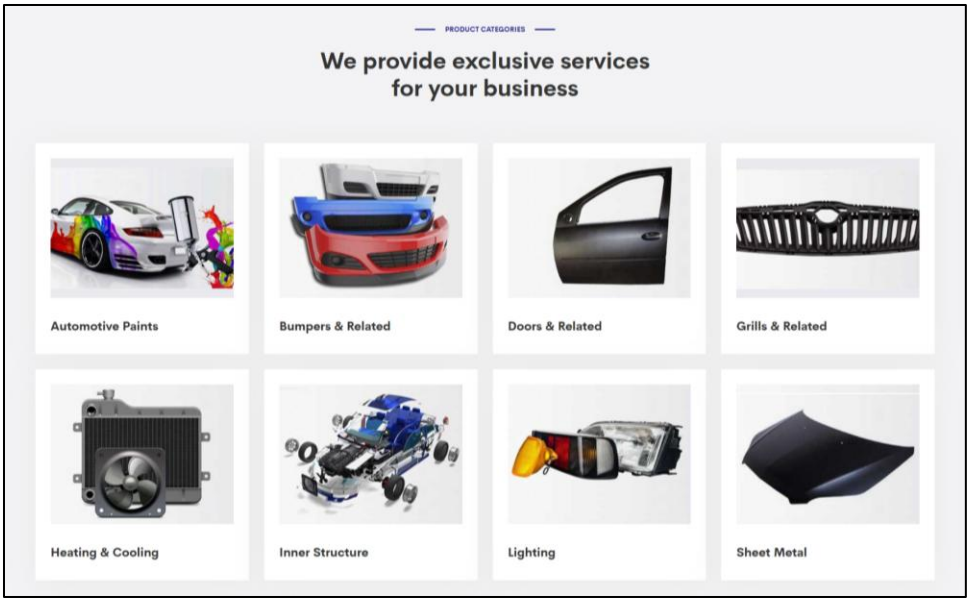

See Exhibit 4.6.

24. Best Value's infringing products include those manufactured by Srumto and Pro Fortune, among others, and have been imported into the United States, sold for importation into the United States, and/sold in the United States after importation. *See infra* Section IV.

25. On information and belief, by virtue of running an automotive parts distribution business, Best Value maintains a commercially significant amount of inventory of each Accused Product in the United States.

iii. Quality Collision Respondents

26. On information and belief, Proposed Respondents Quality Collision Parts, Inc. ("QCP") and Power Auto Parts Inc. ("Power Auto") operate as functionally the same entity. This Complaint refers to QCP and Power Auto collectively as "Quality Collision."

27. QCP is a Michigan corporation with a place of business in Warren, Michigan. QCP operates under the assumed name "Quality Automotive Parts" and has previously operated under the assumed name "Quality Auto Body Parts." *See* Exhibit 4.7.

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28. On information and belief, QCP sells aftermarket replacement automotive parts. For example, QCP advertises that it "sell[s] aftermarket auto body parts that will fit your vehicle perfectly" and indicates that QCP sells aftermarket auto body parts for various makes, including for GM brands. *See* Exhibit 4.8. Further, QCP's website provides an example of its copying and price undercutting practices:

> You are driving a 2015 GMC Acadia and you are looking for a front bumper. You began heading to General Motors (G[M]) collision sh[o]ps and General Motors (GM) dealerships and they were all quoting you $450 and up. If you purchase the 2015 GMC Acadia bumper from us you will only be paying $258.00. This will save you $192.00 that can go towards paint and installation. If you needed more parts on your vehicle besides the front bumper, you can save at least half of the estimate on parts. ***These are the same General Motors (GM) aftermarket auto body parts that your General Motors (GM) collision shop and General Motors (GM) dealership is quoting you for***.

See Exhibit 4.9.

29. Power Auto is a Michigan corporation with a place of business in Warren, Michigan. *See* Exhibit 4.10. Power Auto sells aftermarket replacement automotive parts. For example, Power Auto boasts that it can provide any part for any vehicle:

> Power Auto Parts offers auto parts for all makes and models of automobiles, trucks, and SUVs. If you require auto body replacement body parts for any car, you can simply get Power Auto Parts replacement auto body parts here. If you want to acquire Power Auto Parts auto body parts for any type of vehicle, use Power Auto Parts. Power Auto Parts offers aftermarket replacement parts for all years, makes, and models of vehicles, trucks, and SUVs.

See Exhibit 4.11; *see also* Exhibit 4.12.

30. QCP and Power Auto do not clearly delineate their operations. For example, QCP and Power Auto appear to share a common website that is accessible through different URLs. *Compare* Exhibit 4.11 *with* Exhibit 4.12. Similarly, Power Auto customer intake documents equate Power Auto and QCP. *See* Exhibit 4.13 (the Power Auto customer intake document tells

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customers "Thank You for Your Interest in Becoming A Valued Customer of Quality Collision Parts.").

31. On information and belief, QCP and Power Auto operate as functionally the same entity. QCP, alone or in concert with Power Auto, imports into the United States, sells for importation into the United States, and/or sells in the United States after importation aftermarket automotive body parts.

32. On information and belief, Quality Collision's infringing products include those manufactured by Srumto and AP, among others, and have been imported into the United States, sold for importation into the United States, and/sold in the United States after importation. *See infra* Section IV.

33. On information and belief, by virtue of running an automotive parts distribution business, Quality Collision maintains a commercially significant amount of inventory of each Accused Product in the United States.

2. Purchasing Platform Respondents

i. CCC Intelligent Solutions

34. Proposed Respondent CCC Intelligent Solutions Inc. is a Delaware company with a place of business in Chicago, IL. *See* Exhibit 4.14. On information and belief, CCC Intelligent Solutions Inc. is a wholly owned subsidiary of CCC Intelligent Solutions Holdings Inc., a Delaware company with a place of business in Chicago, IL. *Id.* CCC Intelligent Solutions Inc. and CCC Intelligent Solutions Holdings Inc. will be referred to collectively as "CCC" in this complaint.

35. CCC offers software—a purchasing platform—that facilitates car repairs and sells repair parts. *See* Exhibit 4.14. For example, CCC's "Parts Solutions" allows:

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> automotive parts wholesale dealers, aftermarket parts suppliers, and parts recyclers to make their inventory available to our collision repair and insurance networks in real-time. Using this platform, participating customers are able to give their parts maximum visibility at the moment when repairers are using CCC software to write their repair estimates. This enables parts providers to display their parts inventory and promotional pricing, while automating order processing, invoicing, and settlement.

See Exhibit 4.14.

36. On information and belief, CCC, through its purchasing software, sells, offers for sale, and/or induces customers to purchase Accused Products that are imported into the United States, sold for importation into the United States, and/or sold in the United States after importation by or for one or more of the other Proposed Respondents.

ii. <u>Mitchell International, Inc.</u>

37. On information and belief, Proposed Respondent Mitchell International, Inc. ("Mitchell") is a Delaware corporation with a place of business in San Diego, CA.

38. On information and belief, Mitchell provides software that connects insurers, repair shops, and parts suppliers so that a customer can receive an estimate of how much it will cost to repair a damaged vehicle and buy repair parts. *See* Exhibit 4.15. Mitchell's products, including Mitchell Cloud Estimating, provides a "partner network" that connects customers to infringing parts using "an open platform, proprietary data and intelligent, cloud-first technology." *See* Exhibit 4.15.

39. On information and belief, Mitchell through its purchasing software, sells, offers for sale, and/or induces customers to purchase Accused Products that are imported into the United States, sold for importation into the United States, and/or sold in the United States after importation by or for one or more of the other Proposed Respondents.

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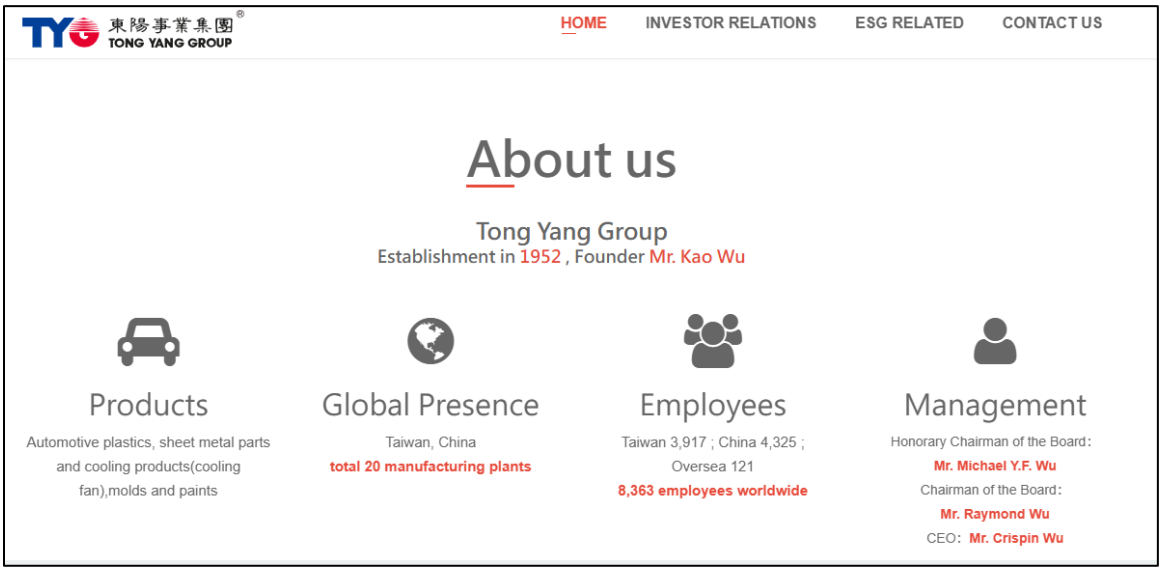
3. Manufacturer Respondents

i. Tong Yang Industry Co., Ltd.

40. Proposed Respondent Tong Yang Industry Co., Ltd. ("Tong Yang") is a Taiwanese company with a place of business in Taiwan. *See* Exhibit 4.16.

41. Tong Yang and its subsidiaries (collectively, "Tong Yang Group" or "TYG") manufacture "[a]utomotive plastics, sheet metal parts, and cooling products (cooling fan), molds and paints." *See* Exhibit 4.17. TYG manufactures automotive products across "20 manufacturing plants" in Taiwan and China, as shown below:



See Exhibit 4.17.

42. On information and belief, TYG's infringing aftermarket automotive parts are imported into the United States, sold for importation into the United States, and/or sold in the United States after importation. *See infra* Section IV.

ii. Y.C.C. Parts Manufacturing Co., Ltd.

43. On information and belief, Proposed Respondent Y.C.C. Parts Manufacturing Co., Ltd. ("YCC") is a Taiwanese company with a place of business in Taiwan.

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44. YCC manufactures and sells automotive plastic parts, including bumpers, grilles, and headlamp panels, among others. *See* Exhibit 4.18. YCC manufactures its automotive parts in Taiwan and China. For example, YCC's website notes it makes parts in Lukang Township:

See Exhibit 4.19.

45. On information and belief, YCC's infringing aftermarket automotive parts are imported into the United States, sold for importation into the United States, and/or sold in the United States after importation. *See infra* Section IV.

iii. Jiangsu Srumto Auto Parts Co., Ltd.

46. On information and belief, Proposed Respondent Jiangsu Srumto Auto Parts Co., Ltd. ("Srumto") is a Chinese company with a place of business in China.

47. Srumto makes and sells automotive body parts. *See* Exhibit 4.20 ("Jiangsu Srumto Auto Parts Co., Ltd. (abbr:SRUMTO) is a manufacturer specialized in development, production and sales for automotive body parts."). On information and belief, Srumto manufactures its automotive parts "in Xinqiao New & Hi-Tech Industrial Park—a well-known center of auto lamps in China, of Danyang City, Jiangsu Province[.]" *See* Exhibit 4.21.

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48. On information and belief, Srumto's infringing aftermarket automotive parts are imported into the United States, sold for importation into the United States, and/or sold in the United States after importation. *See infra* Section IV.

iv. Pro Fortune Industrial Co., Ltd.

49. On information and belief, Proposed Respondent Pro Fortune Industrial Co., Ltd. ("Pro Fortune") is a Taiwanese company with a place of business in Taiwan.

50. Pro Fortune makes and sells "bumper covers, radiator grille[s], headlamp[s,] doors and other plastic automotive parts." *See* Exhibit 4.22. Pro Fortune has factories "located in Tamsui District, New Taipei City and Dayuan District, Taoyuan City." *See id.*

51. On information and belief, Pro Fortune's infringing aftermarket automotive parts are imported into the United States, sold for importation into the United States, and/or sold in the United States after importation. *See infra* Section IV.

v. AP Auto Parts Industrial Ltd.

52. On information and belief, Proposed Respondent AP Auto Parts Industrial Ltd. ("AP") is a Taiwanese company with a place of business in Taiwan.

53. AP makes and sells aftermarket replacement automotive parts. AP's website, www.autoparts.com.tw, states that AP was "[f]ounded in 1979, as an exporter of Automotive Replacement parts" touts AP as "one stop shopping for complete line of auto crash parts." *See* Exhibit 4.23. AP's manufacturing facilities are located in Taiwan. *See* Exhibit 4.24. AP's products include sheet metal body parts such as hoods, fenders, and bumpers, intended as replacement parts for various automotive brands. *See* Exhibit 4.25. AP holds itself out as "a major player in the global auto replacement parts industry." *Id.*

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54. AP also has a North American Business Office in Dallas, TX to "assist our customers during normal business hours so they do not need to try and contact Taiwan when they should be home resting." *See* Exhibit 4.26.

55. On information and belief, AP's infringing aftermarket automotive parts are imported into the United States, sold for importation into the United States, and/or sold in the United States after importation. *See infra* Section IV.

vi. Grand HC Auto Tooling Corp.

56. On information and belief, Proposed Respondent Grand HC Auto Tooling Corp. ("Grand HC") is a Taiwanese company with a place of business in Taiwan.

57. On information and belief, Grand HC makes molded automotive parts, including aftermarket replacement automotive parts. *See* Exhibit 4.27.

58. On information and belief, Grand HC's infringing aftermarket automotive parts are imported into the United States, sold for importation into the United States, and/or sold in the United States after importation. *See infra* Section IV.

vii. Auto Power Co., Ltd.

59. On information and belief, Proposed Respondent Auto Power Co. Ltd. ("Auto Power") is a Taiwanese company with a place of business in Taiwan.

60. Auto Power makes and sells automotive body parts, including bumpers and hoods, and including aftermarket replacement parts. *See* Exhibit 4.28. Auto Power advertises that it makes products in Taiwan and that it is focused on "mak[ing] Auto Power more internationalized." *See* Exhibit 4.28.

61. On information and belief, Auto Power's infringing aftermarket automotive parts are imported into the United States, sold for importation into the United States, and/or sold in the United States after importation. *See infra* Section IV.

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viii. Gordon Auto Body Parts Co., Ltd.

62. Proposed Respondent Gordon Auto Body Parts Co., Ltd. ("Gordon") is a Taiwanese company with a place of business in Taiwan. *See* Exhibit 4.29.

63. Gordon makes and sells automotive replacement parts, particularly sheet metal replacement crash parts. *See* Exhibit 4.30. Gordon advertises that it "is one of the biggest manufacturers of metal replacement crash parts in the world" with plants in Taoyuan, Taiwan. *See id.*

64. On information and belief, Gordon's infringing aftermarket automotive parts are imported into the United States, sold for importation into the United States, and/or sold in the United States after importation. *See infra* Section IV.

ix. Forerunner Automotive Industrial Corp.

65. On information and belief, Proposed Respondent Forerunner Automotive Industrial Corp. ("Forerunner") is a Taiwanese company with a place of business in Taiwan.

66. On information and belief, Forerunner makes and sells aftermarket automotive parts.

67. On information and belief, Forerunner's infringing aftermarket automotive parts are imported into the United States, sold for importation into the United States, and/or sold in the United States after importation. *See infra* Section IV.

x. ANTRC Industrial Corp.

68. On information and belief, Proposed Respondent ANTRC Industrial Corp. ("ANTRC") is a Taiwanese company with a place of business in Taiwan.

69. ANTRC makes and sells automotive replacement parts. *See* Exhibit 4.31. ANTRC advertises that it manufactures various automotive plastic body parts (e.g., fascia, grilles, bumper covers, etc.):

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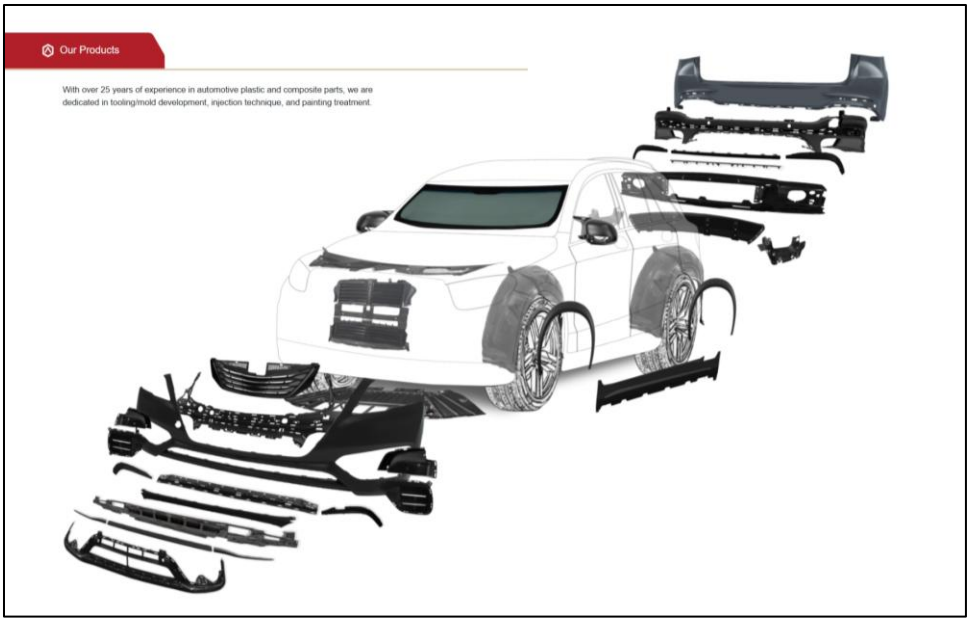

See Exhibit 4.31.

70. On information and belief, ANTRC's infringing aftermarket automotive parts are imported into the United States, sold for importation into the United States, and/or sold in the United States after importation. *See infra* Section IV.

xi. DEPO Respondents

71. Proposed Respondent DEPO Auto Parts Industrial Co., Ltd. ("DEPO Auto Parts") and Proposed Respondent Maxzone Vehicle Lighting Corp. ("Maxzone") are affiliates: Maxzone is a wholly owned subsidiary of DEPO Auto Parts. *See* Exhibit 4.32. This Complaint refers to Maxzone and DEPO Auto Parts collectively as "DEPO Group."

72. Proposed Respondent DEPO Auto Parts is a Taiwanese company with a place of business in Taiwan. *See* Exhibit 4.32.

73. DEPO Auto Parts makes and sells replacement automotive products, such as headlamps and taillights, in Taiwan and China. *See* Exhibit 4.33.

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74. Maxzone is a California company with a place of business in Fontana, California. *See* Exhibit 4.32. On information and belief, Maxzone distributes DEPO Auto Parts products. *See* Exhibits 4.32, 4.34. and 4.35.

75. On information and belief, by virtue of running an automotive parts distribution business, Maxzone maintains a commercially significant amount of inventory of each Accused Product in the United States.

76. On information and belief, DEPO Group's infringing aftermarket automotive parts are imported into the United States, sold for importation into the United States, and/or sold in the United States after importation. *See infra* Section IV.

III. THE ASSERTED PATENTS

A. The '997 Patent

77. The '997 patent, titled "Vehicle rear bumper," issued to GM GTO on February 23, 2016, from U.S. Design Patent Application No. 29/506,080, filed October 13, 2014. The '997 patent names Robert B. McMahan, Brendon C. Mackay, and Tyler L. Moffett as inventors. A copy of the '997 Patent is attached to the Complaint as Exhibit 1.1.

78. The '997 patent remains in full force and effect and expires on February 23, 2030. GM GTO is the owner of all right, title, and interest in and to the '997 patent. *See* Exhibit 2.1.

79. The '997 patent is directed to the ornamental appearance for a vehicle rear bumper, as shown and described in the '997 patent. The '997 patent has four figures, showing the ornamental design features from various viewpoints. Exemplary Figures 1 and 4 are reproduced below:

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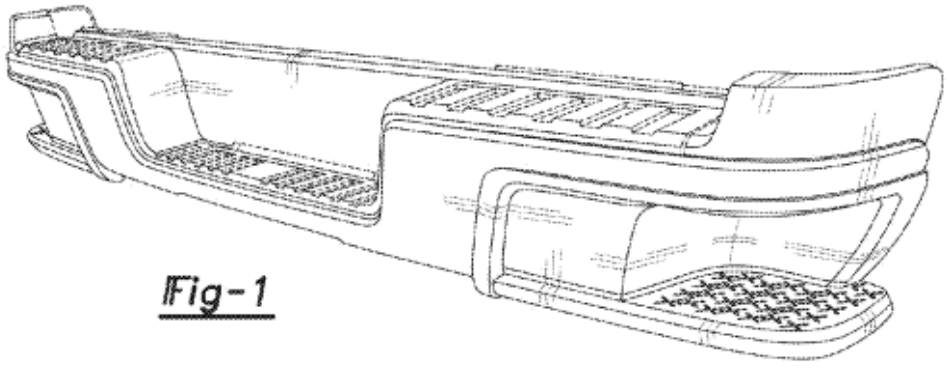

Fig-1

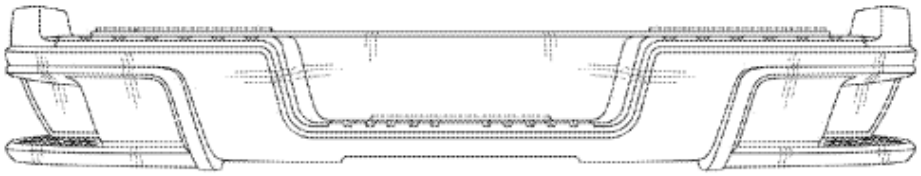

Fig-4

B. The ’815 Patent

80. The ’815 patent, titled “Vehicle front bumper,” issued to GM GTO on July 25, 2017, from U.S. Design Patent Application No. 29/558,815, filed March 22, 2016. The ’815 patent names Timothy P. Kozub as inventor. A copy of the ’815 Patent is attached to the Complaint as Exhibit 1.2.

81. The ’815 patent remains in full force and effect and expires on July 25, 2032. GM GTO is the owner of all right, title, and interest in and to the ’815 patent. *See* Exhibit 2.2.

82. The ’815 patent is directed to the appearance for a vehicle front bumper, as shown and described in the ’815 patent. The ’815 patent has four figures, showing the ornamental design features from various viewpoints. Exemplary Figures 1 and 2 are reproduced below:

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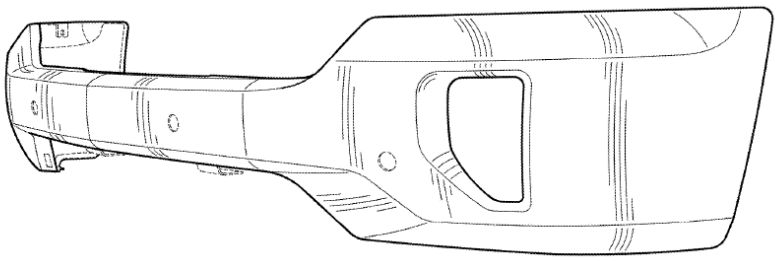

FIG. 1

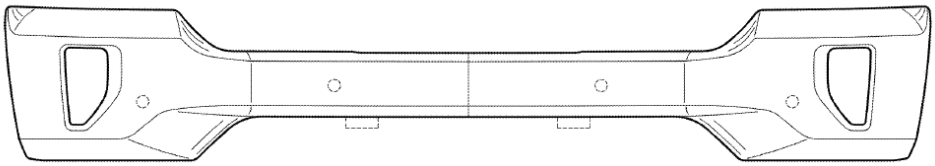

FIG. 2

C. <u>The ’816 Patent</u>

83. The ’816 patent, titled “Vehicle front bumper,” issued to GM GTO on July 25, 2017, from U.S. Design Patent Application No. 29/558,818, filed March 22, 2016. The ’816 patent names Timothy P. Kozub as inventor. A copy of the ’816 Patent is attached to the Complaint as Exhibit 1.3.

84. The ’816 patent remains in full force and effect and expires on July 25, 2032. GM GTO is the owner of all right, title, and interest in and to the ’816 patent. *See* Exhibit 2.3.

85. The ’816 patent is directed to the ornamental appearance for a vehicle front bumper, as shown and described in the ’816 patent. The ’816 patent has four figures, showing the ornamental design features from various viewpoints. Exemplary Figures 1 and 2 are reproduced below:

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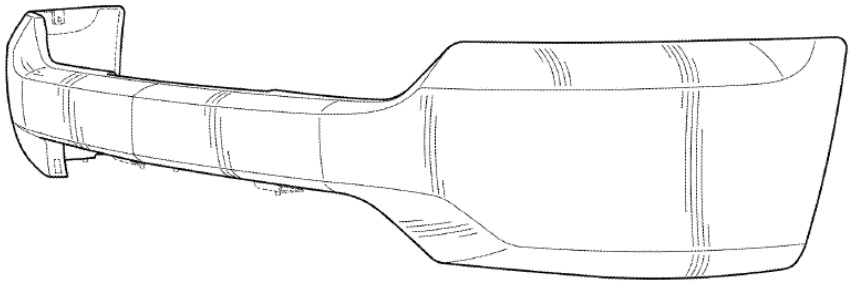

FIG. 1

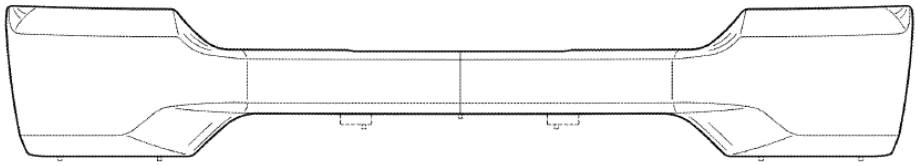

FIG. 2

D. The ’301 Patent

86. The ’301 patent, titled “Automobile front lower fascia,” issued to GM GTO on August 1, 2017, from U.S. Design Patent Application No. 29/559,807, filed March 31, 2016. The ’301 patent names Timothy P. Kozub as inventor. A copy of the ’301 Patent is attached to the Complaint as Exhibit 1.4.

87. The ’301 patent remains in full force and effect and expires on August 1, 2032. GM GTO is the owner of all right, title, and interest in and to the ’301 patent. *See* Exhibit 2.4.

88. The ’301 patent is directed to the ornamental appearance for a vehicle front lower fascia, as shown and described in the ’301 patent. The ’301 patent has four figures, showing the ornamental design features from various viewpoints. Exemplary Figures 1 and 2 are reproduced below:

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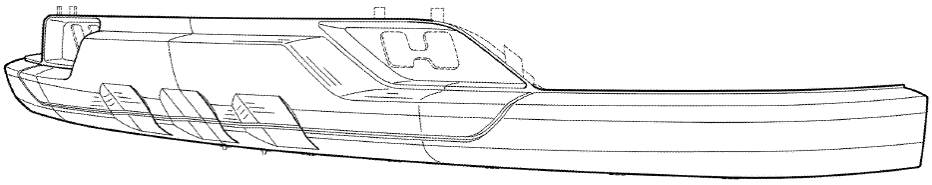

FIG. 1

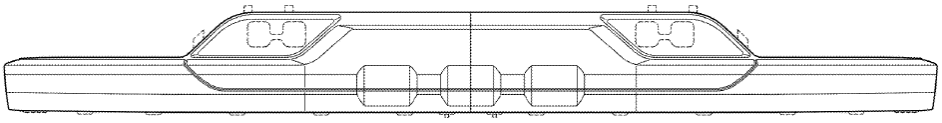

FIG. 2

E. <u>The ’247 Patent</u>

89. The ’247 patent, titled “Vehicle hood,” issued to GM GTO on September 11, 2018, from U.S. Design Patent Application No. 29/609,071, filed June 28, 2017. The ’247 patent names Timothy P. Kozub as inventor. A copy of the ’247 Patent is attached to the Complaint as Exhibit 1.5.

90. The ’247 patent remains in full force and effect and expires on September 11, 2033. GM GTO is the owner of all right, title, and interest in and to the ’247 patent. *See* Exhibit 2.5.

91. The ’247 patent is directed to the ornamental appearance for a vehicle hood, as shown and described in the ’247 patent. The ’247 patent has four figures, showing the ornamental design features from various viewpoints. Exemplary Figure 1 is reproduced below:

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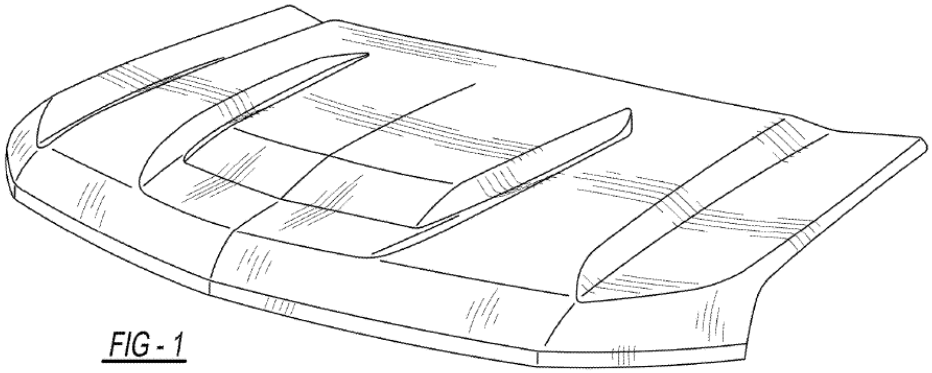

FIG - 1

F. The ’248 Patent

92. The ’248 patent, titled “Vehicle hood,” issued to GM GTO on September 11, 2018, from U.S. Design Patent Application No. 29/609,206, filed June 29, 2017. The ’248 patent names Carl J. Zipfel as inventor. A copy of the ’248 Patent is attached to the Complaint as Exhibit 1.6.

93. The ’248 patent remains in full force and effect and expires on September 11, 2033. GM GTO is the owner of all right, title, and interest in and to the ’248 patent. *See* Exhibit 2.6.

94. The ’248 patent is directed to the ornamental appearance for a vehicle hood, as shown and described in the ’248 patent. The ’248 patent has four figures, showing the ornamental design features from various viewpoints. Exemplary Figure 1 is reproduced below:

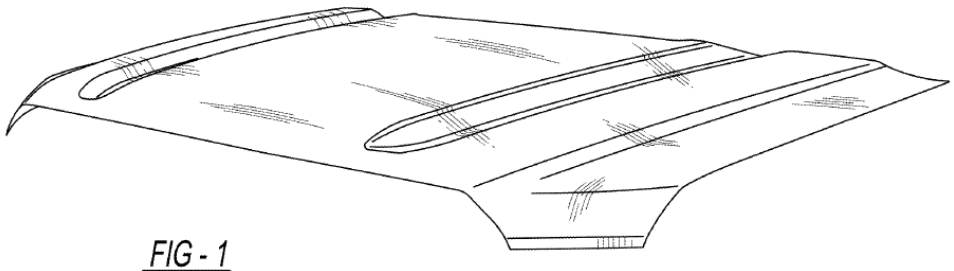

FIG - 1

G. The ’256 Patent

95. The ’256 patent, titled “Vehicle fender,” issued to GM GTO on September 11, 2018, from U.S. Design Patent Application No. 29/609,214, filed June 29, 2017. The ’256 patent

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names Carl J. Zipfel as inventor. A copy of the ’256 Patent is attached to the Complaint as Exhibit 1.7.

96. The ’256 patent remains in full force and effect and expires on September 11, 2033. GM GTO is the owner of all right, title, and interest in and to the ’256 patent. *See* Exhibit 2.7.

97. The ’256 patent is directed to the ornamental appearance for a vehicle fender, as shown and described in the ’256 patent. The ’256 patent has four figures, showing the ornamental design features from various viewpoints. Exemplary Figures 1 and 3 are reproduced below:

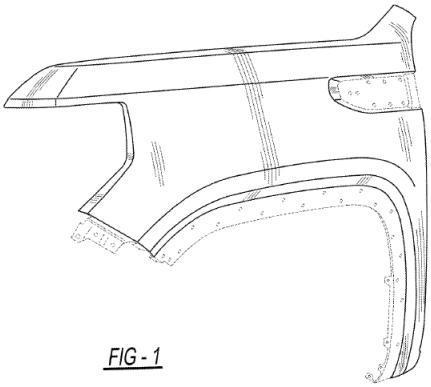

FIG - 1

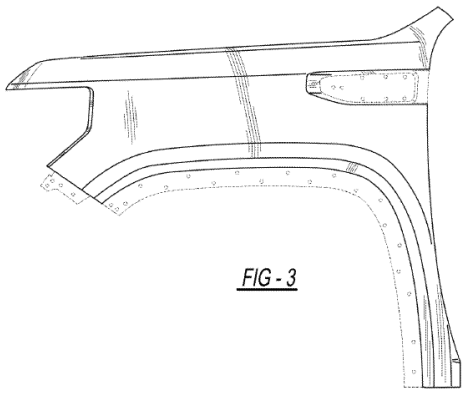

FIG - 3

H. <u>The ’703 Patent</u>

98. The ’703 patent, titled “Vehicle rear bumper,” issued to GM GTO on May 7, 2019, from U.S. Design Patent Application No. 29/609,012, filed June 27, 2017. The ’703 patent names Timothy P. Kozub as inventor. A copy of the ’703 Patent is attached to the Complaint as Exhibit 1.8.

99. The ’703 patent remains in full force and effect and expires on May 7, 2034. GM GTO is the owner of all right, title, and interest in and to the ’703 patent. *See* Exhibit 2.8.

100. The ’703 patent is directed to ornamental appearance for a vehicle rear bumper, as shown and described in the ’703 patent. The ’703 patent has four figures, showing the ornamental design features from various viewpoints. Exemplary Figures 1 and 2 are reproduced below:

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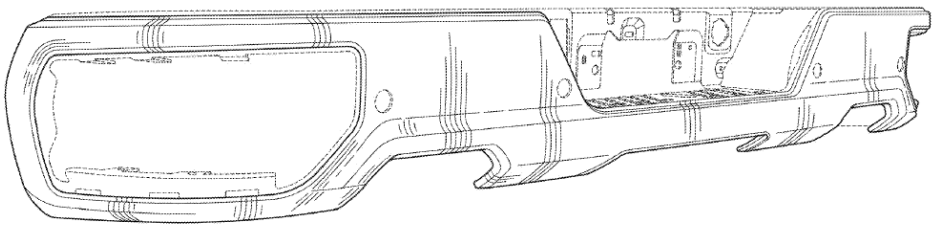

FIG. 1

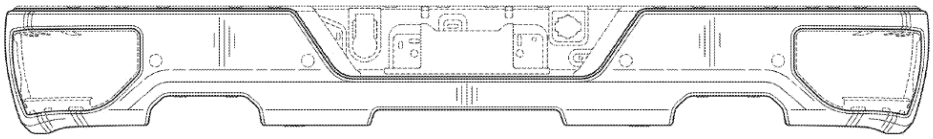

FIG. 2

I. The ’318 Patent

101. The ’318 patent, titled “Vehicle front upper bumper fascia,” issued to GM GTO on May 14, 2019, from U.S. Design Patent Application No. 29/580,976, filed October 14, 2016. The ’318 patent names Robert B. McMahan and Gary W. Ruiz as inventors. A copy of the ’318 Patent is attached to the Complaint as Exhibit 1.9.

102. The ’318 patent remains in full force and effect and expires on May 14, 2034. GM GTO is the owner of all right, title, and interest in and to the ’318 patent. *See* Exhibit 2.9.

103. The ’318 patent is directed to the ornamental appearance for a vehicle front lower fascia, as shown and described in the ’318 patent. The ’318 patent has four figures, showing the ornamental design features from various viewpoints. Exemplary Figures 1 and 2 are reproduced below:

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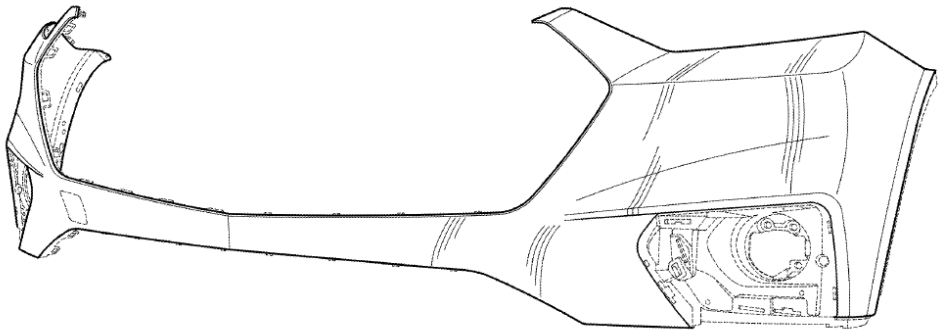

FIG. 1

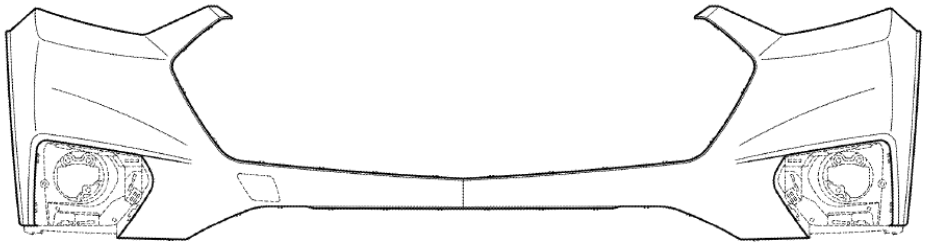

FIG. 2

J. <u>The ’874 Patent</u>

104. The ’874 patent, titled “Vehicle bumper bar,” issued to GM GTO on August 20, 2019, from U.S. Design Patent Application No. 29/609,072, filed June 28, 2017. The ’874 patent names Timothy P. Kozub as inventor. A copy of the ’874 Patent is attached to the Complaint as Exhibit 1.10.

105. The ’874 patent remains in full force and effect and expires on August 20, 2034. GM GTO is the owner of all right, title, and interest in and to the ’874 patent. *See* Exhibit 2.10.

106. The ’874 patent is directed to the ornamental appearance for a vehicle front lower fascia, as shown and described in the ’874 patent. The ’874 patent has four figures, showing the ornamental design features from various viewpoints. Exemplary Figures 1 and 3 are reproduced below:

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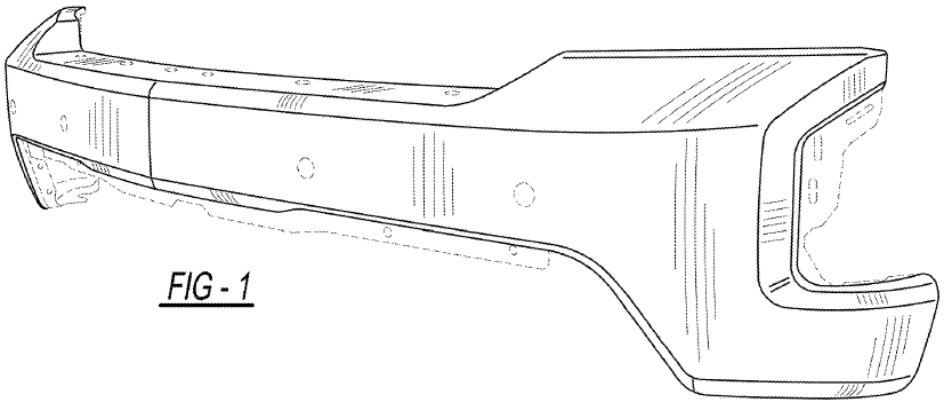

FIG - 1

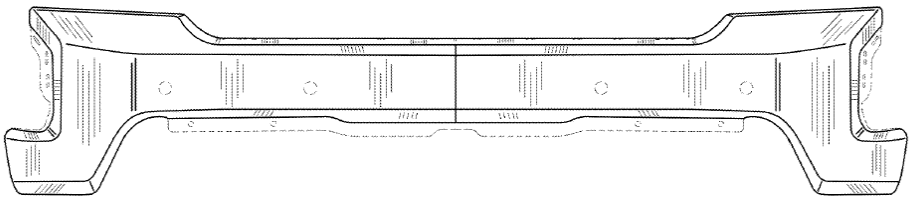

FIG - 3

K. The ’406 Patent

107. The ’406 patent, titled “Vehicle front fender,” issued to GM GTO on May 22, 2018, from U.S. Design Patent Application No. 29/581,001, filed October 14, 2016. The ’406 patent names Robert B. McMahan and Gary W. Ruiz as inventors. A copy of the ’406 Patent is attached to the Complaint as Exhibit 1.11.

108. The ’406 patent remains in full force and effect and expires on May 22, 2033. GM GTO is the owner of all right, title, and interest in and to the ’406 patent. *See* Exhibit 2.11.

109. The ’406 patent is directed to the ornamental appearance for a vehicle front fender, as shown and described in the ’406 patent. The ’406 patent has four figures, showing the ornamental design features from various viewpoints. Exemplary Figures 1 and 3 are reproduced below:

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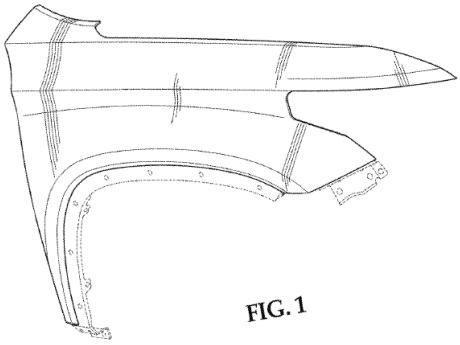

FIG. 1

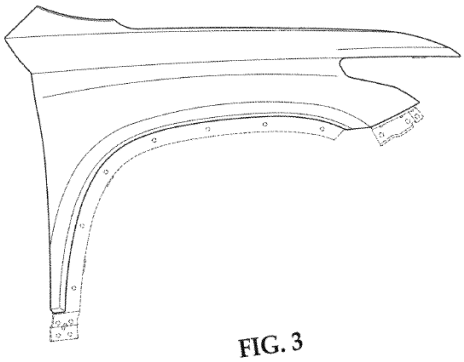

FIG. 3

L. The ’114 Patent

110. The ’114 patent, titled “Vehicle front bumper,” issued to GM GTO on August 21, 2018, from U.S. Design Patent Application No. 29/603,215, filed May 8, 2017. The ’114 patent names Brian J. Smith and Evan Mai as inventors. A copy of the ’114 Patent is attached to the Complaint as Exhibit 1.12.

111. The ’114 patent remains in full force and effect and expires on August 21, 2033. GM GTO is the owner of all right, title, and interest in and to the ’114 patent. *See* Exhibit 2.12.

112. The ’114 patent is directed to the ornamental appearance for a vehicle front lower fascia, as shown and described in the ’114 patent. The ’114 patent has five figures, showing the ornamental design features from various viewpoints. Exemplary Figures 1 and 2 are reproduced below:

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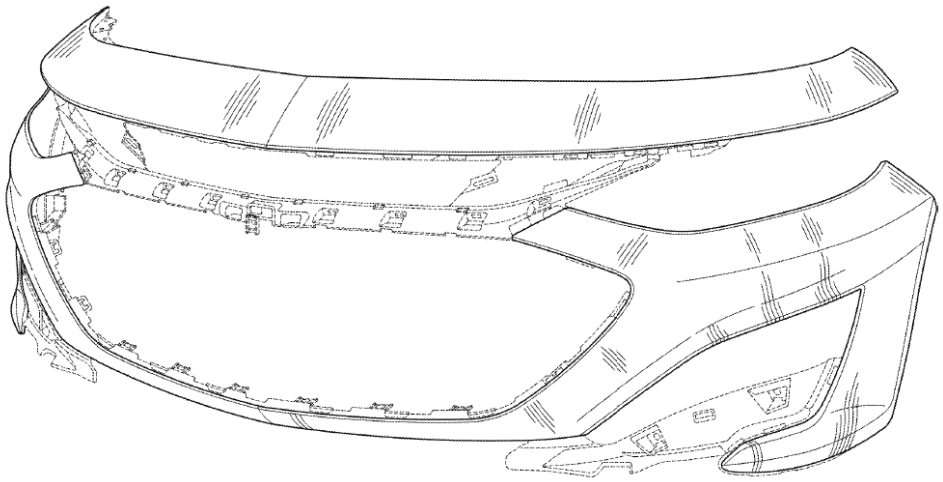

FIG. 1

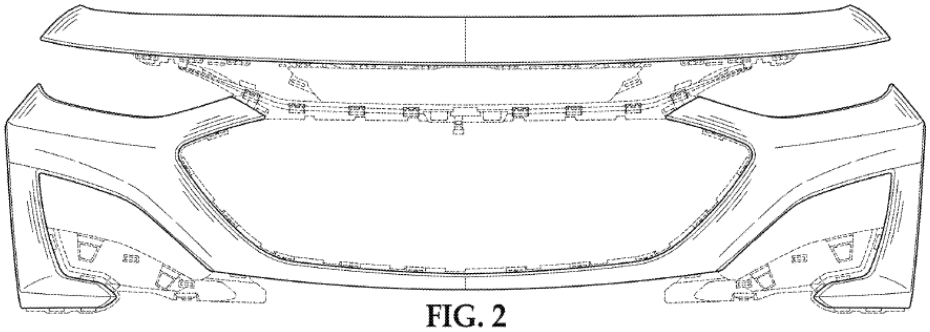

FIG. 2

M. <u>The ’025 Patent</u>

113. The ’025 patent, titled “Vehicle front headlamp,” issued to GM GTO on March 12, 2019, from U.S. Design Patent Application No. 29/603,198, filed May 8, 2017. The ’025 patent names Brian J. Smith and Samir Datta as inventors. A copy of the ’025 Patent is attached to the Complaint as Exhibit 1.13.

114. The ’025 patent remains in full force and effect and expires on March 12, 2034. GM GTO is the owner of all right, title, and interest in and to the ’025 patent. *See* Exhibit 2.13.

115. The ’025 patent is directed to the ornamental appearance for a vehicle headlamp, as shown and described in the ’025 patent. The ’025 patent has eight figures, showing the

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ornamental design features from various viewpoints. Exemplary Figures 1 and 2 are reproduced below:

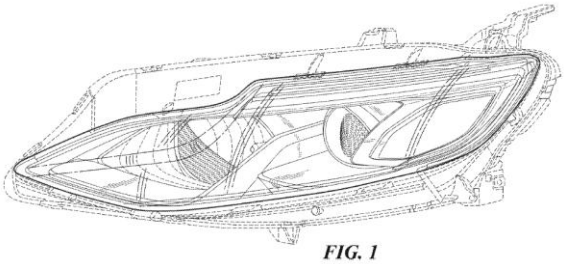

FIG. 1

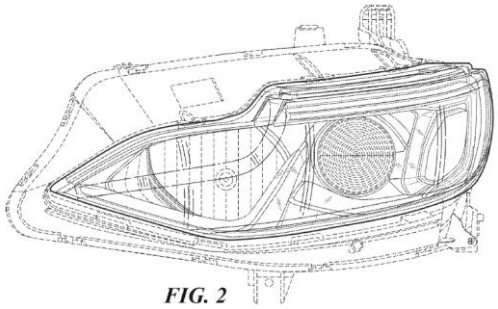

FIG. 2

N. The ’155 Patent

116. The ’155 patent, titled “Vehicle fender,” issued to GM GTO on May 5, 2020, from U.S. Design Patent Application No. 29/642,243, filed March 28, 2018. The ’155 patent names Brian M. Izard as inventor. A copy of the ’155 Patent is attached to the Complaint as Exhibit 1.14.

117. The ’155 patent remains in full force and effect and expires on May 5, 2035. GM GTO is the owner of all right, title, and interest in and to the ’155 patent. *See* Exhibit 2.14.

118. The ’155 patent is directed to the ornamental appearance for a vehicle fender, as shown and described in the ’155 patent. The ’155 patent has four figures, showing the ornamental design features from various viewpoints. Exemplary Figures 1 and 3 are reproduced below:

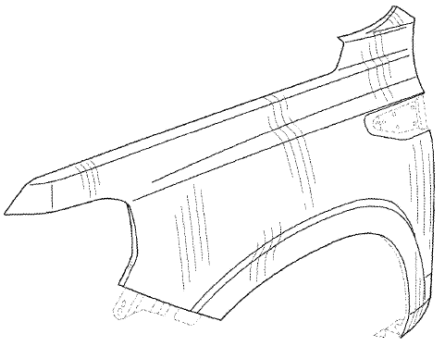

FIG - 1

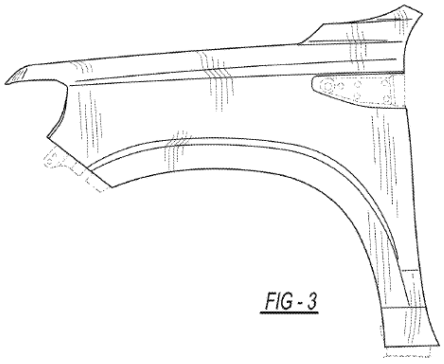

FIG - 3

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O. The ’807 Patent

119. The ’807 patent, titled “Vehicle hood,” issued to GM GTO on November 24, 2020, from U.S. Design Patent Application No. 29/704,188, filed September 3, 2019. The ’807 patent names Gary W. Ruiz as inventor. A copy of the ’807 Patent is attached to the Complaint as Exhibit 1.15.

120. The ’807 patent remains in full force and effect and expires on November 24, 2035. GM GTO is the owner of all right, title, and interest in and to the ’807 patent. *See* Exhibit 2.15.

121. The ’807 patent is directed to the ornamental appearance for a vehicle hood, as shown and described in the ’807 patent. The ’807 patent has five figures, showing the ornamental design features from various viewpoints. Exemplary Figures 1 is reproduced below:

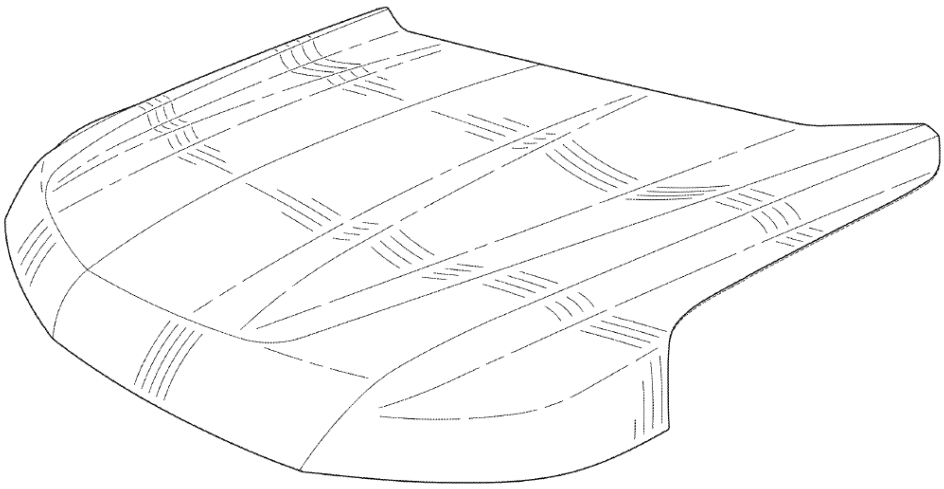

FIG. 1

P. The ’533 Patent

122. The ’533 patent, titled “Vehicle front fender,” issued to GM GTO on September 14, 2021, from U.S. Design Patent Application No. 29/719,730, filed January 7, 2020. The ’533 patent names Gary W. Ruiz as inventor. A copy of the ’533 Patent is attached to the Complaint as Exhibit 1.16.

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123. The ’533 patent remains in full force and effect and expires on September 14, 2036. GM GTO is the owner of all right, title, and interest in and to the ’533 patent. *See* Exhibit 2.16.

124. The ’533 patent is directed to the ornamental appearance for a vehicle front fender, as shown and described in the ’533 patent. The ’533 patent has four figures, showing the ornamental design features from various viewpoints. Exemplary Figures 1 and 2 are reproduced below:

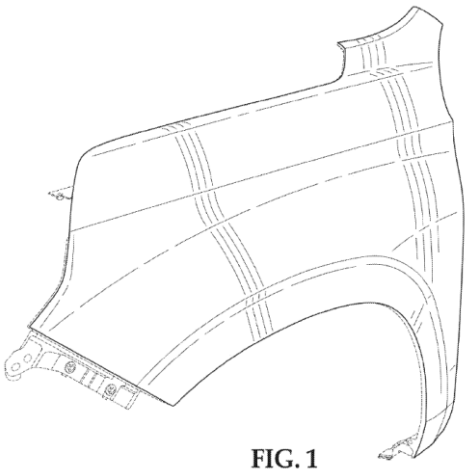

FIG. 1

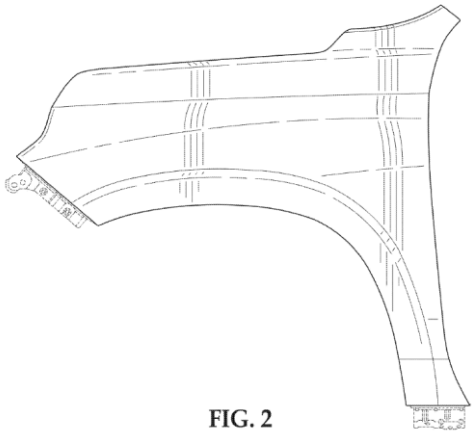

FIG. 2

Q. <u>The ’939 Patent</u>

125. The ’939 patent, titled “Vehicle front bumper,” issued to GM GTO on June 28, 2022, from U.S. Design Patent Application No. 29/770,477, filed February 12, 2021. The ’939 patent names Rebecka A. Buller and Eduardo H. Mine as inventors. A copy of the ’939 Patent is attached to the Complaint as Exhibit 1.17.

126. The ’939 patent remains in full force and effect and expires on June 28, 2037. GM GTO is the owner of all right, title, and interest in and to the ’939 patent. *See* Exhibit 2.17.

127. The ’939 patent is directed to the ornamental appearance for a vehicle front bumper, as shown and described in the ’939 patent. The ’939 patent has seven figures, showing the

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ornamental design features from various viewpoints. Exemplary Figures 1 and 2 are reproduced below:

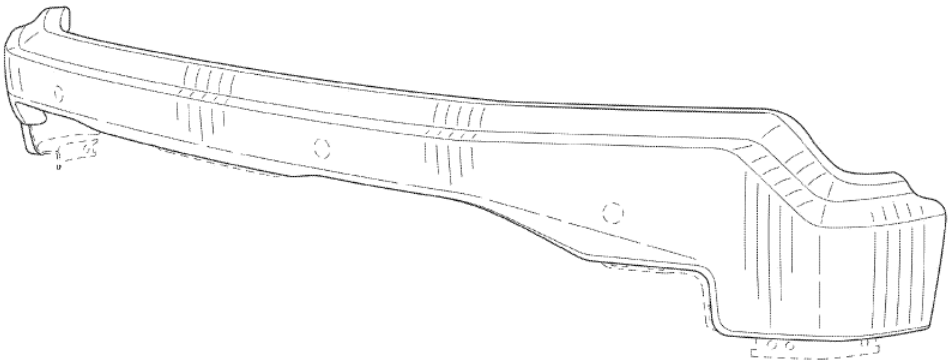

FIG. 1

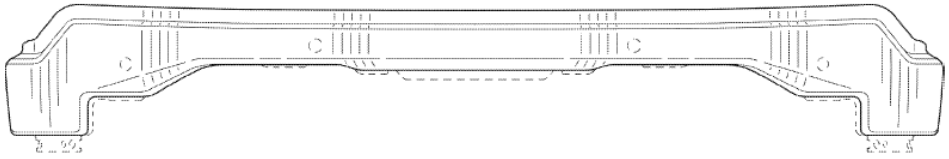

FIG. 2

R. <u>The ’239 Patent</u>

128. The ’239 patent, titled “Vehicle rear bumper,” issued to GM GTO on September 10, 2019, from U.S. Design Patent Application No. 29/653,951, filed June 20, 2018. The ’239 patent names Maxwell A. Sullivan and Jose Gonzalez as inventors. A copy of the ’239 Patent is attached to the Complaint as Exhibit 1.18.

129. The ’239 patent remains in full force and effect and expires on September 10, 2034. GM GTO is the owner of all right, title, and interest in and to the ’239 patent. *See* Exhibit 2.18.

130. The ’239 patent is directed to the ornamental appearance for a vehicle rear bumper, as shown and described in the ’239 patent. The ’239 patent has five figures, showing the ornamental design features from various viewpoints. Exemplary Figures 1 and 2 are reproduced below:

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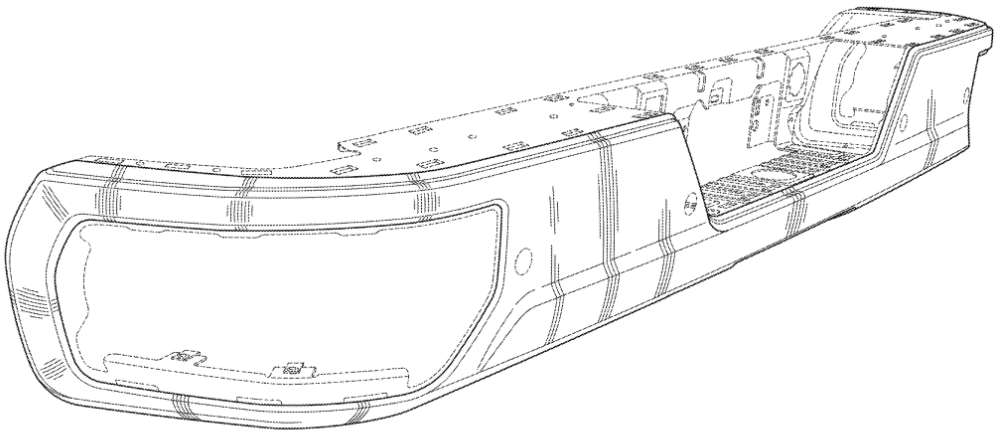

FIG. 1

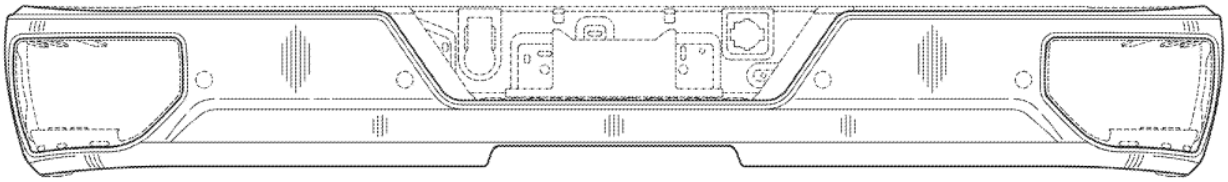

FIG. 2

S. <u>The ’647 Patent</u>

131. The ’647 patent, titled “Vehicle front headlamp,” issued to GM GTO on May 14, 2019, from U.S. Design Patent Application No. 29/608,663, filed June 23, 2017. The ’647 patent names Timothy P. Kozub as inventor. A copy of the ’647 Patent is attached to the Complaint as Exhibit 1.19.

132. The ’647 patent remains in full force and effect and expires on May 14, 2034. GM GTO is the owner of all right, title, and interest in and to the ’647 patent. *See* Exhibit 2.19.

133. The ’647 patent is directed to the ornamental appearance for a vehicle front headlamp, as shown and described in the ’647 patent. The ’647 patent has eight figures, showing the ornamental design features from various viewpoints. Exemplary Figure 1 is reproduced below:

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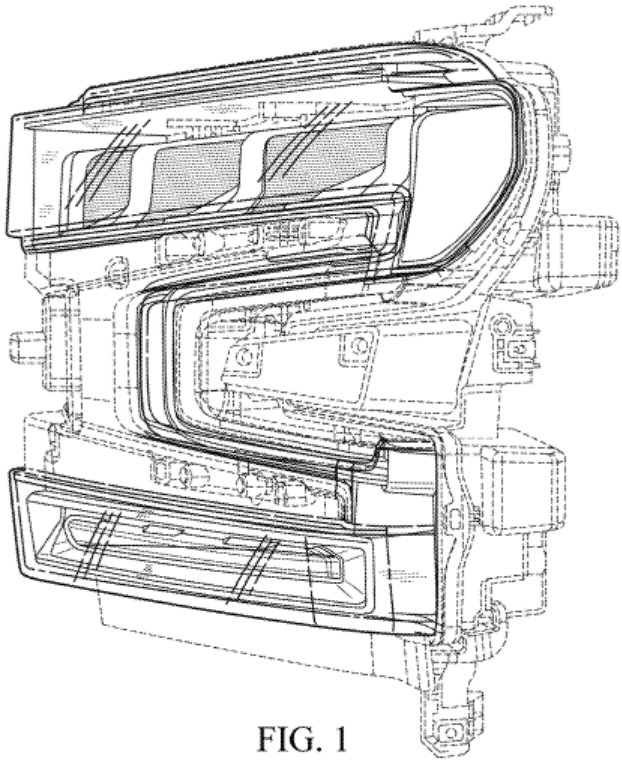

FIG. 1

T. <u>The ’803 Patent</u>

134. The ’803 patent, titled “Vehicle front lower bumper fascia,” issued to GM GTO on August 28, 2018, from U.S. Design Patent Application No. 29/603,383, filed May 9, 2017. The ’803 patent names Brian J. Smith and Evan Mai as inventors. A copy of the ’803 Patent is attached to the Complaint as Exhibit 1.20.

135. The ’803 patent remains in full force and effect and expires on August 28, 2033. GM GTO is the owner of all right, title, and interest in and to the ’803 patent. *See* Exhibit 2.20.

136. The ’803 patent is directed to ornamental appearance for a vehicle front lower bumper fascia, as shown and described in the ’803 patent. The ’803 patent has five figures, showing the ornamental design features from various viewpoints. Exemplary Figures 1 and 2 are reproduced below:

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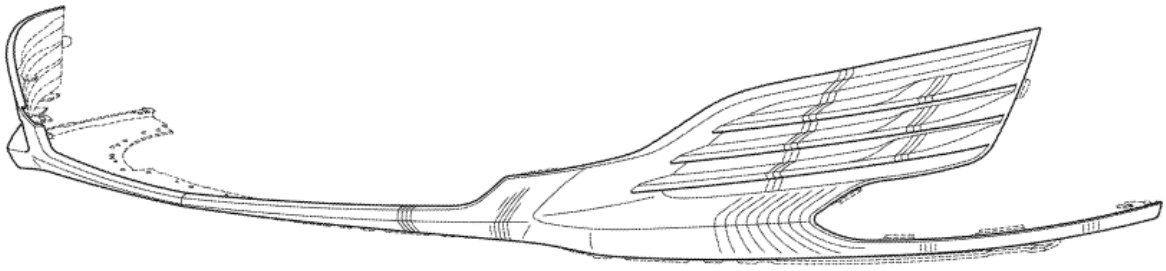

FIG. 1

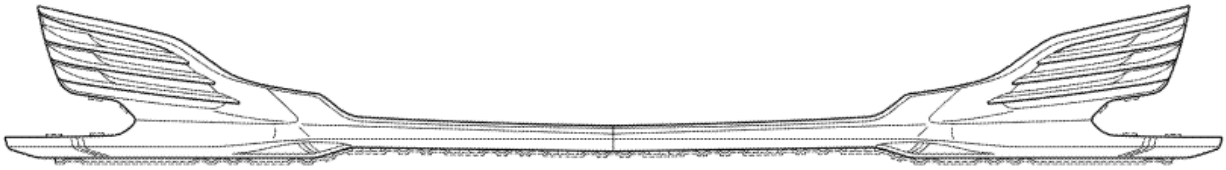

FIG. 2

U. Licenses to the Asserted Patents

137. Pursuant to Commission Rule 210.12(a)(9)(iii), GM LLC is the sole licensee to the Asserted Patents. A copy of the confidential license agreement is attached to this Complaint as Exhibit 5.1C.

V. Corresponding Patents

138. The following table shows foreign and domestic patents and patent applications that correspond to the Asserted Patents:

Asserted Patent	Country	Corresponding Application No.	Corresponding Pat. / Pub. No.	Status
D749,997	United States	US29/544900	USD767454 S1	Granted
D792,815	China	CN201630478258.2	CN304279720S	Expired
	Mexico	MX2016002917D	MX52401S	Granted
D792,816	China	CN201630476604.3	CN304150675S	Lapsed
	Mexico	MX2016002918D	MX52400S	Granted
D793,301	China	CN201630488023.1	CN304292465S	Lapsed
	Mexico	MX2016002996D	MX51737S	Granted

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Asserted Patent	Country	Corresponding Application No.	Corresponding Pat. / Pub. No.	Status
D828,247	Brazil	BR302017005862	BR302017005862S1	Granted
	Canada	CA178786D	CA178786S	Granted
	Mexico	MX2017003993D	MX54555S	Granted
D828,248	Canada	CA178777D	CA178777S	Granted
	Mexico	MX2017004070D	MX54079S	Granted
D828,256	Canada	CA178788D	CA178788S	Granted
	Mexico	MX2017004063D	MX54056S	Granted
D847,703	Brazil	BR302017005901D	BR302017005901S1	Granted
	Canada	CA178911D	CA178911S	Granted
	Mexico	MX2018000031D	MX54873S	Granted
D848,318	Canada	CA174018D	CA174018S	Granted
	Mexico	MX2017001076D	MX52414S	Granted
D856,874	Brazil	BR302017005868D	BR302017005868S1	Granted
	Canada	CA178781D	CA178781S	Granted
	Mexico	MX2017003986D	MX54692S	Granted
D818,406	Brazil	BR302017001610D	BR302017001610S1	Lapsed
	Canada	CA174067D	CA174067S	Granted
	Mexico	MX2017001094D	MX52417S	Granted
D826,114	Brazil	BR302017004985D	BR302017004985S1	Granted
	Canada	CA178023D	CA178023S	Granted
	China	CN201730546137.1	CN304641531S	Granted
	Korea	KR3020170052007	KR300999082S	Granted
	Mexico	MX2017003456D	MX54849S	Granted
D843,025	Brazil	BR302017004983	BR302017004983S1	Granted
	Canada	CA178022D	CA178022S	Granted
	China	CN201730546136.7	CN304652784S	Granted
	Korea	KR3020170052006	KR30103413500002S	Granted
	Korea	KR3020170052006	KR30103413500001S	Granted
	Mexico	MX2017003455D	MX55750S	Granted
	Mexico	MX2019000830D	MX57558S	Granted

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Asserted Patent	Country	Corresponding Application No.	Corresponding Pat. / Pub. No.	Status
	United States	US29/674666	USD857946S1	Granted
D883,155	U.A.E.	AE20186000507D	AE5793S	Granted
	Saudi Arabia	SA418400040	SA418400040S	Published
	Saudi Arabia	SA418400040	SA7461S	Granted
D902,807	Mexico	MX2020000513D	MX61078S	Granted
D930,533	Canada	CA194989D	CA194989S	Granted
	Mexico	MX2020001337D	MX62106S	Granted
D955,939	U.A.E.	AE20216000582D	AE7552S	Granted
	Canada	CA205554D	CA205554S	Granted
	U.A.E	AE20186000672D	AE5177S	Granted
	Canada	CA184907D	CA184907S	Granted
	Saudi Arabia	SA418400237	SA7527S	Granted
D859,239	Saudi Arabia	SA418400237	SA418400237S	Published
D848,647	Brazil	BR302017005839	BR302017005839S1	Granted
	Canada	CA178912D	CA178912S	Granted
	Mexico	MX2018000023D	MX55728S	Granted
	Mexico	MX2019000981D	MX57549S	Granted
	United States	US29/679840	USD884939S1	Granted
D826,803	Brazil	BR302017005014D	BR302017005014S1	Granted
	Canada	CA178046D	CA178046S	Granted
	China	CN201730549474.6	CN304689161S	Granted
	Korea	KR3020170052239	KR300999083S	Granted
	Mexico	MX2017003481D	MX54004S	Granted

139. GM, after reasonable inquiry, is aware of no other foreign counterparts or foreign counterpart applications corresponding to the Asserted Patents that have been issued, abandoned, denied, withdrawn, or which remain pending.

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IV. SPECIFIC INSTANCES OF UNFAIR IMPORTATION AND INFRINGEMENT

140. The Accused Products infringe the Asserted Patents because, in the eye of an ordinary observer, giving such attention as a purchaser usually gives, the designs of the Accused Products are substantially the same as the designs embodied in the Asserted Patents, and the resemblance is such as to deceive such an observer, inducing him or her to purchase the Accused Products.

141. Each of the Proposed Respondents directly infringe, and/or indirectly infringe one or more of the Asserted Patents in violation of 35 U.S.C. §§ 271(a), (b), and/or (c), and Section 337(a)(1)(B)(i), as described in further detail below. Each the Proposed Respondents imports, sells for importation, and/or sells within the United States after importation certain Accused Products that infringe one or more of the Asserted Patents.

142. The Proposed Respondents know, have known, or willfully blinded themselves, of the Asserted Patents. Each Proposed Respondent has knowledge of each Asserted Patent at least as of the filing of this Complaint. Further, on information and belief, Respondents had knowledge of the Asserted Patents because GM virtually marks the Protected Parts per 35 U.S.C. § 287(a). To this end, GM maintains a website, https://www.gmparts.com/gm-part-design-patents, that associates each Protected Part with the number of the patent that covers the Protected Part.

143. The Distributor Respondents, without license or authorization, infringe the Asserted Patents under 35 U.S.C. § 271(b), for example, by encouraging the repair shops and end users to directly infringe the Asserted Patents by importing, selling, offering to sell, and/or using the Accused Products.

144. The Purchasing Platform Respondents, without license or authorization, infringe the Asserted Patents under 35 U.S.C. § 271(b), for example, by providing software that connects

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repair shops with distributors (such as the Distributor Respondents), to import, use, sell, and/or offer to sell the Accused Products in the United States.

145. The Manufacturer Respondents, without license or authorization, infringe the Asserted Patents under 35 U.S.C. § 271(b), for example, by providing the Accused Products to distributors (such as the Distributor Respondents) to import, use, sell, and/or offer to sell the Accused Products in the United States.

146. The Proposed Respondents, without license or authorization, also indirectly infringe the Asserted Patents under 35 U.S.C. § 271(c). For example, automotive parts may be provided as components. Bumpers for certain vehicles are illustrative: on occasion, a step pad for a bumper may be sold separately from a larger bumper scaffold on which the step pad is placed. Components may be combined into a replacement part or placed into an existing vehicle, thus infringing an Asserted Patent.

147. On information and belief, one or more Distributor Respondents provide components of certain Accused Products parts to repair shops and end users. By providing these components to repair shops and end users, one or more Distributor Respondents encourage these entities to directly infringe the Asserted Patents by selling, offering to sell, and using the Accused Products. The Distributor Respondents know each component provided is a material part of the claimed design, is especially made and especially adapted for use in each claimed design, and that there is no substantial non-infringing use for each infringing component.

148. On information and belief, one or more Purchasing Platform Respondents are involved in selling and offering to sell components of Accused Products to repair shops and end users. By facilitating these component sales to repair shops and/or end users, one or more Purchasing Platform Respondents encourage the repair shops and/or end users to directly infringe

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the Asserted Patents by selling, offering to sell, and using the Accused Products. These Distributor Respondents know each component provided is a material part of the claimed design, is especially made and especially adapted for use in each claimed design, and that there is no substantial non-infringing use for each infringing component.

149. On information and belief, one or more Manufacturer Respondents are involved in selling and offering to sell components of Accused Products parts to distributors, such as the Distributor Respondents. By facilitating these component sales to distributors, one or more Manufacturer Respondents encourage distributors to directly infringe the Asserted Patents by selling, offering to sell, and using the Accused Products. These Manufacturer Respondents know each component provided is a material part of the claimed design, is especially made and especially adapted for use in each claimed design, and that there is no substantial non-infringing use for each infringing component.

150. Furthermore, multiple Manufacturer Respondents have sought and obtained certification for the Accused Products from the Certified Automotive Parts Association ("CAPA"), which further shows importation and infringement. *See* Exhibits 7.1-7.20. CAPA is a third party that will certify a replacement automotive part, such as an Accused Product, is substantially the same as the Protected Part it is intended to supplant. CAPA specifically offers certification for said parts for the United States. *Id.* Exhibits 7.1-7.20 show which Respondents have obtained CAPA certification for the United States.

151. The infringing parts, parties, and acts described above and throughout this Complaint are merely exemplary of the widespread violations of 19 U.S.C. § 1337 by the Proposed Respondents and others. As discussed below, Respondents and others sell multiple variations of these aftermarket automotive parts, one or more of which have been documented herein as an

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exemplary violation of 19 U.S.C. § 1337. These exemplary violations do not limit the Accused Products.

A. Proposed Respondents Directly and/or Indirectly Infringe the '997 Patent

152. At least Proposed Respondents LKQ, Quality Collision, CCC, Mitchell, Srumto, and Grand HC, import, sell for importation, and/or sell within the United States after importation certain Accused Products that infringe the '997 patent directly and/or indirectly.

153. For example, Part No. GM1103180DSC[1] was purchased in the United States from LKQ utilizing CCC's purchasing platform. *See* Exhibits 6.21-6.22. The LKQ sample was manufactured by Grand HC in Taiwan and imported into the United States. *See id.* Part No. GM1103180 was also purchased in the United States from Quality Collision. *See* Exhibits 6.21-22. The Quality Collision sample was manufactured by Srumto in China and imported into the United States. *See id.* Samples of the Accused Products are available upon request.

154. Purchased Part Nos. GM1103180DSC and GM1103180 are representative of at least Part Nos. GM1102562, GM1103204, GM1102565, GM1102561, GM1103181, and GM1103205, as well as other infringing parts that are imported into the United States, sold for importation into the United States, and/or sold within the United States after importation.

155. Part No. GM1103180DSC is also listed as available for purchase in the United States from LKQ on the Mitchell purchasing platform. *See* Exhibit 7.21. Accordingly, Part No. GM1103180DSC that is listed on the Mitchell purchasing platform has, on information and belief, the same foreign manufacturer as Part Number GM1103180DSC that is listed on CCC's purchasing platform.

[1] Certain part numbers used herein contain a suffix (e.g., "DSC" or "C") that denotes various additional certifications that are immaterial to the ornamental design of the particular part.

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156. On its U.S. website, CAPA lists Taiwanese manufacturer Grand HC as a CAPA certified manufacturer of Part Nos. GM1102562, GM1103204, GM1102565, GM1102561, GM1103180, GM1103181, and GM1103205 for sale in the United States. *See* Exhibit 7.1. Grand HC manufactures Part Nos. GM1102562, GM1103204, GM1102565, GM1102561, GM1103180, GM1103181, and GM1103205 in Taiwan for importation into the United States.

157. Part Nos. GM1103180DSC and GM1103180 are substantially similar to the design claimed in the ’997 patent. A claim chart that applies the ’997 patent to representative products shows that Respondents infringe the ’997 patent. *See* Exhibit 6.1.

158. On information and belief, each Respondent identified in this subsection has had actual or constructive knowledge of the ’997 patent before this Complaint was filed.

B. Proposed Respondents Directly and/or Indirectly Infringe the ’815 Patent

159. At least Proposed Respondents LKQ, Quality Collision, CCC, Mitchell, and Auto Power, import, sell for importation, and/or sell within the United States after importation certain Accused Products that infringe the ’815 patent directly and/or indirectly.

160. For example, Part No. GM1002861 was purchased in the United States from Quality Collision. *See* Exhibit 6.23. The Quality Collision sample was manufactured in Taiwan and imported into the United States. *See id.* Samples of the Accused Products are available upon request.

161. Purchased Part No. GM1002861 is representative of at least Part Nos. GM1002862, and GM1002868, as well as other infringing parts that are imported into the United States, sold for importation into the United States, and/or sold within the United States after importation.

162. On its U.S. website, CAPA lists Taiwanese manufacturer Auto Power as a CAPA certified manufacturer of Part Nos. GM1002861, GM1002862, and GM1002868 for sale in the

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United States. *See* Exhibit 7.2. Auto Power manufactures Part Nos. GM1002861, GM1002862, and GM1002868 in Taiwan for importation into the United States.

163. Part No. GM1002861DSC is listed as available for purchase in the United States from LKQ on the Mitchell purchasing platform. *See* Exhibit 7.22. On information and belief, Part No. GM1002861DSC is also listed as available for purchase in the United States from LKQ on the CCC purchasing platform. Part No. GM1002861DSC that is listed on the Mitchell and CCC purchasing platforms and sold by LKQ is, on information and belief, manufactured by Auto Power in Taiwan and imported and/or sold for importation into the United States.

164. Part No. GM1002861 is substantially similar to the design claimed in the ’815 patent. A claim chart that applies the ’815 patent to representative products shows that Respondents infringe the ’815 patent. *See* Exhibit 6.2.

165. On information and belief, each Respondent identified in this subsection has had actual or constructive knowledge of the ’815 patent before this Complaint was filed.

C. Proposed Respondents Directly and/or Indirectly Infringe the ’816 Patent

166. At least Proposed Respondents LKQ, Quality Collision, CCC, Mitchell, and Auto Power, import, sell for importation, and/or sell within the United States after importation certain Accused Products that infringe the ’816 patent directly and/or indirectly.

167. For example, Part No. GM1002869 was purchased in the United States from Quality Collision. *See* Exhibit 6.24. The Quality Collision sample was manufactured in Taiwan and imported into the United States. *See id.* Samples of the Accused Products are available upon request.

168. Purchased Part No. GM1002869 is representative of at least Part Nos. GM1002860 and GM1002863 as well as other infringing parts that are imported into the United States, sold for importation into the United States, and/or sold within the United States after importation.

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169. On its U.S. website, CAPA lists Taiwanese Manufacturer Auto Power as a CAPA certified manufacturer of Part Nos. GM1002860, GM1002863, and GM1002869 for sale in the United States. *See* Exhibit 7.3. Auto Power manufactures Part Nos. GM1002860, GM1002863, and GM1002869 in Taiwan for importation into the United States.

170. Part No. GM1002869C is listed as available for purchase in the United States from LKQ on the Mitchell purchasing platform. *See* Exhibit 7.23. On information and belief, Part No. GM1002869C is also listed as available for purchase in the United States from LKQ on the CCC purchasing platform. Part No. GM1002869C that is listed on the Mitchell and CCC purchasing platforms and sold by LKQ is, on information and belief, manufactured by Auto Power in Taiwan and imported and/or sold for importation into the United States.

171. Part No. GM1002869 is substantially similar to the design claimed in the ’816 patent. A claim chart that applies the ’816 patent to representative products shows that Respondents infringe the ’816 patent. *See* Exhibit 6.3.

172. On information and belief, each Respondent identified in this subsection has had actual or constructive knowledge of the ’816 patent before this Complaint was filed.

D. Proposed Respondents Directly and/or Indirectly Infringe the ’301 Patent

173. At least Proposed Respondents LKQ, Best Value, Quality Collision, CCC, Mitchell, Pro Fortune, and TYG, import, sell for importation, and/or sell within the United States after importation certain Accused Products that infringe the ’301 patent directly and/or indirectly.

174. For example, Part No. GM1015135PP was purchased in the United States from LKQ utilizing CCC’s purchasing platform. *See* Exhibits 6.25-6.27. The LKQ sample was manufactured by Pro Fortune in Taiwan and imported into the United States. *See id.* Part No. GM1015135 was also purchased in the United States from Best Value. *See* Exhibits 6.25-6.27. The Best Value sample was manufactured by Pro Fortune in Taiwan and imported into the United

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States. *See id.* Part No. GM1015135 was also purchased in the United States from Quality Collision. *See* Exhibits 6.25-6.27. The Quality Collision sample was manufactured in China and imported into the United States. *See id.* Samples of the Accused Products are available upon request.

175. Purchased Part Nos. GM1015135PP and GM1015135 are representative of at least Part Nos. GM1015134, as well as other infringing parts that are imported into the United States, sold for importation into the United States, and/or sold within the United States after importation.

176. Part No. GM1015135PP is also listed as available for purchase in the United States from LKQ on the Mitchell purchasing platform. *See* Exhibit 7.24. Accordingly, Part No. GM1015135PP that is listed on the Mitchell purchasing platform has, on information and belief, the same foreign manufacturer as Part Number GM1015135PP that is listed on CCC's purchasing platform.

177. On its U.S. website, CAPA lists Taiwanese manufacturer Pro Fortune as a CAPA certified manufacturer of Part Nos. GM1015134 and GM1015135 for sale in the United States. *See* Exhibit 7.4. CAPA's website further lists TYG as a CAPA certified manufacturer of Part Nos. GM1015134 and GM1015135 for the United States. *See* Exhibit 7.4. Pro Fortune and TYG manufacture Part Nos. GM1015134 and GM1015135 in Taiwan for importation into the United States.

178. Part Nos. GM1015135PP and GM1015135 are substantially similar to the design claimed in the '301 patent. A claim chart that applies the '301 patent to representative products shows that Respondents infringe the '301 patent. *See* Exhibit 6.4.

179. On information and belief, each Respondent identified in this subsection has had actual or constructive knowledge of the '301 patent before this Complaint was filed.

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E. Proposed Respondents Directly and/or Indirectly Infringe the '247 Patent

180. At least Proposed Respondents LKQ, Best Value, Quality Collision, CCC, Mitchell, AP, Gordon, and TYG, import, sell for importation, and/or sell within the United States after importation certain Accused Products that infringe the '247 patent directly and/or indirectly.

181. For example, Part No. GM1230475C was purchased in the United States from LKQ utilizing CCC's purchasing platform. *See* Exhibits 6.28-6.30. The LKQ sample was manufactured by Gordon in Taiwan and imported into the United States. *See id.* Part No. GM1230475 was also purchased in the United States from Best Value. *See* Exhibits 6.28-6.30. Best Value sources products from manufacturers in Taiwan and China such as Pro Fortune and Srumto, *see, e.g.*, Sections IV.D and IV.H, and Part No. GM1230475 includes packaging with Simplified Chinese instructions, Exhibits 6.28-6.30. According to importation records, Best Value has been a consignee for aftermarket automotive parts shipped to the United States from ports of lading in Taiwan and China. *See* Exhibits 6.77-6.78. Accordingly, on information and belief, the Best Value sample was manufactured in Taiwan or China and imported into the United States. Part No. GM1230475C was also purchased in the United States from Quality Collision. *See* Exhibits 6.28-30. The Quality Collision sample was manufactured by AP in Taiwan and imported into the United States. *See id.* Samples of the Accused Products are available upon request.

182. Purchased Part Nos. GM1230475C and GM1230475 are representative of other infringing parts that are imported into the United States, sold for importation into the United States, and/or sold within the United States after importation.

183. Part No. GM1230475C is also listed as available for purchase in the United States from LKQ on the Mitchell purchasing platform. *See* Exhibit 7.25. Accordingly, Part No. GM1230475C that is listed on the Mitchell purchasing platform has, on information and belief,

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the same foreign manufacturer as Part Number GM1230475C that is listed on CCC's purchasing platform.

184. On its U.S. website, CAPA lists Taiwanese manufacturer AP as a CAPA certified manufacturer of Part No. GM1230475 for sale in the United States. *See* Exhibit 7.5. CAPA's website further lists Taiwanese manufacturer Gordon as a CAPA certified manufacturer of Part No. GM1230475 for sale in the United States. *See* Exhibit 7.5. CAPA's website further lists Taiwanese manufacturer TYG as a CAPA certified manufacturer of Part No. GM1230475 for sale in the United States. *See* Exhibit 7.5. AP, Gordon, and TYG manufacture Part No. GM1230475 in Taiwan for importation into the United States.

185. Part Nos. GM1230475C and GM1230475 are substantially similar to the design claimed in the '247 patent. A claim chart that applies the '247 patent to representative products shows that Respondents infringe the '247 patent. *See* Exhibit 6.5.

186. On information and belief, each Respondent identified in this subsection has had actual or constructive knowledge of the '247 patent before this Complaint was filed.

F. Proposed Respondents Directly and/or Indirectly Infringe the '248 Patent

187. At least Proposed Respondents LKQ, Best Value, Quality Collision, CCC, Mitchell, and TYG, import, sell for importation, and/or sell within the United States after importation certain Accused Products that infringe the '248 patent directly and/or indirectly.

188. For example, Part No. GM1230477C was purchased in the United States from LKQ utilizing CCC's purchasing platform. *See* Exhibits 6.31-6.33. The LKQ sample was manufactured by TYG in Taiwan and imported into the United States. *See id.* Part No. GM1230477 was also purchased in the United States from Best Value. *See* Exhibits 6.31-6.33. Best Value sources products from manufacturers in Taiwan and China such as Pro Fortune and Srumto, *see, e.g.*, Sections IV.D and IV.H, and Part No. GM1230477 includes packaging with Simplified Chinese

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instructions, Exhibits 6.31-6.33. According to importation records, Best Value has been a consignee for aftermarket automotive parts shipped to the United States from ports of lading in Taiwan and China. *See* Exhibits 6.77-6.78. Accordingly, on information and belief, the Best Value sample was manufactured in Taiwan or China and imported into the United States. Part No. GM1230477 was also purchased in the United States from Quality Collision. *See* Exhibits 6.31-6.33. Quality Collision sources products from manufacturers in Taiwan and China such as AP and Srumto, *see* Sections IV.E and IV.I, and Part No. GM1230477 includes packaging with Simplified Chinese instructions, Exhibits 6.31-6.33. According to importation records, Quality Collision has been a consignee for aftermarket automotive parts shipped to the United States from ports of lading in Taiwan and China. *See* Exhibits 6.79-6.80. Accordingly, on information and belief, the Quality Collison sample was manufactured in Taiwan or China and imported into the United States. Samples of the Accused Products are available upon request.

189. Purchased Part Nos. GM1230477C and GM1230477 are representative of other infringing parts that are imported into the United States, sold for importation into the United States, and/or sold within the United States after importation.

190. Part No. GM1230477C is also listed as available for purchase in the United States from LKQ on the Mitchell purchasing platform. *See* Exhibit 7.26. Accordingly, Part No. GM1230477C that is listed on the Mitchell purchasing platform has, on information and belief, the same foreign manufacturer as Part Number GM1230477C that is listed on CCC's purchasing platform.

191. On its U.S. website, CAPA lists Taiwanese manufacturer TYG as a CAPA certified manufacturer of Part No. GM1230477 for sale in the United States. *See* Exhibit 7.6. TYG manufactures Part No. GM1230477 in Taiwan for importation into the United States.

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192. Part Nos. GM1230477C and GM1230477 are substantially similar to the design claimed in the ’248 patent. A claim chart that applies the ’248 patent to representative products shows that Respondents infringe the ’248 patent. *See* Exhibit 6.6.

193. On information and belief, each Respondent identified in this subsection has had actual or constructive knowledge of the ’248 patent before this Complaint was filed.

G. Proposed Respondents Directly and/or Indirectly Infringe the ’256 Patent

194. At least Proposed Respondents LKQ, Best Value, Quality Collision, CCC, Mitchell, and TYG, import, sell for importation, and/or sell within the United States after importation certain Accused Products that infringe the ’256 patent directly and/or indirectly.

195. For example, Part No. GM1240413C was purchased in the United States from LKQ utilizing CCC’s purchasing platform. *See* Exhibits 6.34-6.36. The LKQ sample was manufactured by TYG in Taiwan and imported into the United States. *See id.* Part No. GM1240413 was also purchased in the United States from Best Value. *See* Exhibits 6.34-6.36. Best Value sources products from manufacturers in Taiwan and China such as Pro Fortune and Srumto, see, e.g., Sections IV.D and IV.H, and Part No. GM1240413 includes packaging with Simplified Chinese writing, Exhibits 6.34-6.36. According to importation records, Best Value has been a consignee for aftermarket automotive parts shipped to the United States from ports of lading in Taiwan and China. *See* Exhibits 6.77-6.78. Accordingly, on information and belief, the Best Value sample was manufactured in Taiwan or China and imported into the United States. Part No. GM1240413 was also purchased in the United States from Quality Collision. *See* Exhibits 6.34-6.36. Quality Collision sources products from manufacturers in Taiwan and China such as AP and Srumto. *See* Sections IV.E and IV.I. According to importation records, Quality Collision has been a consignee for aftermarket automotive parts shipped to the United States from ports of lading in Taiwan and China. *See* Exhibits 6.79-6.80. Accordingly, on information and belief, the Quality Collison

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sample was manufactured in Taiwan or China and imported into the United States. Samples of the Accused Products are available upon request.

196. Purchased Part Nos. GM1240413C and GM1240413 are representative of at least Part Nos. GM1241413, as well as other infringing parts that are imported into the United States, sold for importation into the United States, and/or sold within the United States after importation.

197. Part No. GM1240413C is also listed as available for purchase in the United States from LKQ on the Mitchell purchasing platform. *See* Exhibit 7.27. Accordingly, Part No. GM1240413C that is listed on the Mitchell purchasing platform has, on information and belief, the same foreign manufacturer as Part Number GM1240413C that is listed on CCC's purchasing platform.

198. On its U.S. website, CAPA lists Taiwanese manufacturer TYG as a CAPA certified manufacturer of Part Nos. GM1240413 and GM1241413 for sale in the United States. *See* Exhibit 7.7. TYG manufactures Part Nos. GM1240413 and GM1241413 in Taiwan for importation into the United States.

199. Part Nos. GM1240413C and GM1240413 are substantially similar to the design claimed in the '256 patent. A claim chart that applies the '256 patent to representative products shows that Respondents infringe the '256 patent. *See* Exhibit 6.7.

200. On information and belief, each Respondent identified in this subsection has had actual or constructive knowledge of the '256 patent before this Complaint was filed.

H. Proposed Respondents Directly and/or Indirectly Infringe the '703 Patent

201. At least Proposed Respondents LKQ, Best Value, Quality Collision, CCC, Mitchell, Forerunner, Grand HC and Srumto, import, sell for importation, and/or sell within the United States after importation certain Accused Products that infringe the '703 patent directly and/or indirectly.

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202. For example, Part No. GM1102577DSC was purchased in the United States from LKQ utilizing CCC's purchasing platform. *See* Exhibits 6.37-6.39. The LKQ sample was manufactured by Grand HC in Taiwan and imported into the United States. *See id.* Part No. GM1102577 was also purchased in the United States from Best Value. *See* Exhibits 6.37-6.39. The Best Value sample was manufactured by Srumto in China and imported into the United States. *See id.* Part No. GM1102577 was also purchased in the United States from Quality Collision. *See* Exhibits 6.37-6.39. The Quality Collision sample was manufactured in China and imported into the United States. *See id.* Samples of the Accused Products are available upon request.

203. Purchased Part Nos. GM1102577DSC and GM1102577 are representative of at least Part Nos. GM1102576, GM1102571, and GM1102572, as well as other infringing parts that are imported into the United States, sold for importation into the United States, and/or sold within the United States after importation.

204. Part No. GM1102577DSC is also listed as available for purchase in the United States from LKQ on the Mitchell purchasing platform. *See* Exhibit 7.28. Accordingly, Part No. GM1102577DSC that is listed on the Mitchell purchasing platform has, on information and belief, the same foreign manufacturer as Part Number GM1102577DSC that is listed on CCC's purchasing platform.

205. On its U.S. website, CAPA lists Taiwanese manufacturer Forerunner as a CAPA certified manufacturer of Part Nos. GM1102576, GM1102577, GM1102571, and GM1102572 for sale in the United States. *See* Exhibit 7.8. CAPA's website further lists Taiwanese manufacturer Grand HC as a CAPA certified manufacturer of Part Nos. GM1102576, GM1102577, GM1102571, and GM1102572 for sale in the United States. *See* Exhibit 7.8. Forerunner and

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Grand HC manufacture Part Nos. GM1102576, GM1102577, GM1102571, and GM1102572 in Taiwan for importation into the United States.

206. Part Nos. GM1102577DSC and GM1102577 are substantially similar to the design claimed in the ’703 patent. A claim chart that applies the ’703 patent to representative products shows that Respondents infringe the ’703 patent. *See* Exhibit 6.8.

207. On information and belief, each Respondent identified in this subsection has had actual or constructive knowledge of the ’703 patent before this Complaint was filed.

I. Proposed Respondents Directly and/or Indirectly Infringe the ’318 Patent

208. At least Proposed Respondents LKQ, Best Value, Quality Collision, CCC, Mitchell, TYG, YCC, and Srumto, import, sell for importation, and/or sell within the United States after importation certain Accused Products that infringe the ’318 patent directly and/or indirectly.

209. For example, Part No. GM1014134C was purchased in the United States from LKQ utilizing CCC’s purchasing platform. *See* Exhibits 6.40-6.42. The LKQ sample was manufactured by YCC in Taiwan and imported into the United States. *See id.* Part No. GM1014134 was also purchased in the United States from Best Value. *See* Exhibits 6.40-6.42. Best Value sources products from manufacturers in Taiwan and China such as Pro Fortune and Srumto. *See, e.g.*, Sections IV.D and IV.H. According to importation records, Best Value has been a consignee for aftermarket automotive parts shipped to the United States from ports of lading in Taiwan and China. *See* Exhibits 6.77-6.78. Accordingly, on information and belief, the Best Value sample was manufactured in Taiwan or China and imported into the United States. Part No. GM1014134 was also purchased in the United States from Quality Collision. *See* Exhibits 6.40-6.42. The Quality Collision sample was manufactured by Srumto in China and imported into the United States. *See id.* Samples of the Accused Products are available upon request.

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210. Purchased Part Nos. GM1014134C and GM1014134 are representative of other infringing parts that are imported into the United States, sold for importation into the United States, and/or sold within the United States after importation.

211. Part No. GM1014134C is also listed as available for purchase in the United States from LKQ on the Mitchell purchasing platform. *See* Exhibit 7.29. Accordingly, Part No. GM1014134C that is listed on the Mitchell purchasing platform has, on information and belief, the same foreign manufacturer as Part Number GM1014134C that is listed on CCC's purchasing platform.

212. On its U.S. website, CAPA lists Taiwanese manufacturer TYG as a CAPA certified manufacturer of Part No. GM1014134 for sale in the United States. *See* Exhibit 7.9. CAPA's website further lists Taiwanese manufacturer YCC as a CAPA certified manufacturer of Part No. GM1014134 for sale in the United States. *See* Exhibit 7.9. TYG and YCC manufacture Part No. GM1014134 in Taiwan for importation into the United States.

213. Part Nos. GM1014134C and GM1014134 are substantially similar to the design claimed in the '318 patent. A claim chart that applies the '318 patent to representative products shows that Respondents infringe the '318 patent. *See* Exhibit 6.9.

214. On information and belief, each Respondent identified in this subsection has had actual or constructive knowledge of the '318 patent before this Complaint was filed.

J. Proposed Respondents Directly and/or Indirectly Infringe the '874 Patent

215. At least Proposed Respondents LKQ, Quality Collision, CCC, Mitchell, and Grand HC, import, sell for importation, and/or sell within the United States after importation certain Accused Products that infringe the '874 patent directly and/or indirectly.

216. For example, Part No. GM1002874DSC was purchased in the United States from LKQ utilizing CCC's purchasing platform. *See* Exhibits 6.43-6.44. The LKQ sample was

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manufactured by Grand HC in Taiwan and imported into the United States. *See id.* Part No. GM1002875 was also purchased in the United States from Quality Collision. *See* Exhibits 6.43-6.44. The Quality Collision sample was manufactured in Taiwan and imported into the United States. *See id.* Samples of the Accused Products are available upon request.

217. Purchased Part Nos. GM1002874DSC and GM1002875 are representative of at least Part Nos. GM1002875, GM1002872, and GM1002873, as well as other infringing parts that are imported into the United States, sold for importation into the United States, and/or sold within the United States after importation.

218. Part No. GM1102557DSC is also listed as available for purchase in the United States from LKQ on the Mitchell purchasing platform. *See* Exhibit 7.30. Accordingly, Part No. GM1102557DSC that is listed on the Mitchell purchasing platform has, on information and belief, the same foreign manufacturer as Part Number GM1002874DSC that is listed on CCC's purchasing platform.

219. On its U.S. website, CAPA lists Taiwanese manufacturer Grand HC as a CAPA certified manufacturer of Part Nos. GM1002875, GM1002872, GM1002873, and GM1002874 for sale in the United States. *See* Exhibit 7.10. Grand HC manufactures Part Nos. GM1002875, GM1002872, GM1002873, and GM1002874 in Taiwan for importation into the United States.

220. Part Nos. GM1002874DSC and GM1002875 are substantially similar to the design claimed in the '874 patent. A claim chart that applies the '874 patent to representative products shows that Respondents infringe the '874 patent. *See* Exhibit 6.10.

221. On information and belief, each Respondent identified in this subsection has had actual or constructive knowledge of the '874 patent before this Complaint was filed.

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K. Proposed Respondents Directly and/or Indirectly Infringe the '406 Patent

222. At least Proposed Respondents LKQ, Quality Collision, CCC, Mitchell, Gordon, and TYG, import, sell for importation, and/or sell within the United States after importation certain Accused Products that infringe the '406 patent directly and/or indirectly.

223. For example, Part No. GM1241409C was purchased in the United States from LKQ utilizing CCC's purchasing platform. *See* Exhibits 6.45-6.46. The LKQ sample was manufactured by Gordon in Taiwan and imported into the United States. *See id.* Part No. GM1241409SF was also purchased in the United States from Quality Collision. *See* Exhibits 6.45-6.46. Quality Collision sources products from manufacturers in Taiwan and China such as AP and Srumto. *See* Sections IV.E and IV.I. According to importation records, Quality Collision has been a consignee for aftermarket automotive parts shipped to the United States from ports of lading in Taiwan and China. *See* Exhibits 6.79-6.80. Accordingly, on information and belief, the Quality Collison sample was manufactured in Taiwan or China and imported into the United States. Samples of the Accused Products are available upon request.

224. Purchased Part Nos. GM1241409C and GM1241409SF are representative of at least Part Nos. GM1240409 and GM1241409, as well as other infringing parts that are imported into the United States, sold for importation into the United States, and/or sold within the United States after importation.

225. Part No. GM1241409C is also listed as available for purchase in the United States from LKQ on the Mitchell purchasing platform. *See* Exhibit 7.31. Accordingly, Part No. GM1241409C that is listed on the Mitchell purchasing platform has, on information and belief, the same foreign manufacturer as Part Number GM1241409C that is listed on CCC's purchasing platform.

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226. On its U.S. website, CAPA lists Taiwanese manufacturer Gordon as a CAPA certified manufacturer of Part Nos. GM1240409 and GM1241409 for sale in the United States. *See* Exhibit 7.11. CAPA's website further lists Taiwanese manufacturer TYG as a CAPA certified manufacturer of Part Nos. GM1240409 and GM1241409 for sale in the United States. *See* Exhibit 7.11. Gordon and TYG manufacture Part Nos. GM1240409 and GM1241409 in Taiwan for importation into the United States.

227. Part Nos. GM1241409C and GM1241409SF are substantially similar to the design claimed in the '406 patent. A claim chart that applies the '406 patent to representative products shows that Respondents infringe the '406 patent. *See* Exhibit 6.11.

228. On information and belief, each Respondent identified in this subsection has had actual or constructive knowledge of the '406 patent before this Complaint was filed.

L. Proposed Respondents Directly and/or Indirectly Infringe the '114 Patent

229. At least Proposed Respondents LKQ, Best Value, Quality Collision, CCC, Mitchell, ANTRC, and Pro Fortune, import, sell for importation, and/or sell within the United States after importation certain Accused Products that infringe the '114 patent directly and/or indirectly.

230. For example, Part No. GM1000A37 was purchased in the United States from Best Value. *See* Exhibits 6.47-6.48. The Best Value sample was manufactured in Taiwan and imported into the United States. *See id.* GM1000A37 was also obtained in the United States from Quality Collision. *See* Exhibits 6.47-6.48. The Quality Collision sample was manufactured in China and imported into the United States. *See id.* Samples of the Accused Products are available upon request.

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231. Purchased Part No. GM1000A37 is representative of other infringing parts that are imported into the United States, sold for importation into the United States, and/or sold within the United States after importation.

232. On its U.S. website, CAPA lists Taiwanese manufacturer ANTRC as a CAPA certified manufacturer of Part No. GM1000A37 for sale in the United States. *See* Exhibit 7.12. CAPA's website further lists Taiwanese manufacturer Pro Fortune as a CAPA certified manufacturer of Part No. GM1000A37 for sale in the United States. *See* Exhibit 7.12. ANTRC and Pro Fortune manufacture Part No. GM1000A37 in Taiwan for importation into the United States.

233. Part No. GM1000A37C is listed as available for purchase in the United States from LKQ on the Mitchell purchasing platform. *See* Exhibit 7.32. On information and belief, Part No. GM1000A37C is also listed as available for purchase in the United States from LKQ on the CCC purchasing platform. Part No. GM1000A37C that is listed on the Mitchell and CCC purchasing platforms is, on information and belief, manufactured by ANTRC and/or Pro Fortune in Taiwan and imported and/or sold for importation into the United States.

234. Part No. GM1000A37 is substantially similar to the design claimed in the '114 patent. A claim chart that applies the '114 patent to representative products shows that Respondents infringe the '114 patent. *See* Exhibit 6.12.

235. On information and belief, each Respondent identified in this subsection has had actual or constructive knowledge of the '114 patent before this Complaint was filed.

M. Proposed Respondents Directly and/or Indirectly Infringe the '025 Patent

236. At least Proposed Respondents LKQ, Quality Collision, CCC, Mitchell, and DEPO Group, import, sell for importation, and/or sell within the United States after importation certain Accused Products that infringe the '025 patent directly and/or indirectly.

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237. For example, Part No. GM2502498C was purchased in the United States from LKQ utilizing CCC's purchasing platform. *See* Exhibits 6.49-6.51. The LKQ sample was manufactured by DEPO Auto Parts in Taiwan and imported into the United States. *See id.* Part No. 60012 was also purchased in the United States from Quality Collision. *See* Exhibits 6.49-6.51. The Quality Collision sample was manufactured in China and imported into the United States. *See id.* Samples of the Accused Products are available upon request.

238. Purchased Part Nos. GM2502498C, GM2503498, 60012 are representative of at least Part No. GM2502498 and Quality Collision Part No. 60013, as well as other infringing parts that are imported into the United States, sold for importation into the United States, and/or sold within the United States after importation.

239. Part No. GM2502498C is also listed as available for purchase in the United States from LKQ on the Mitchell purchasing platform. *See* Exhibit 7.33. Accordingly, Part No. GM2502498C that is listed on the Mitchell purchasing platform has, on information and belief, the same foreign manufacturer as Part Number GM2502498C that is listed on CCC's purchasing platform.

240. On its U.S. website, CAPA lists Taiwanese manufacturer DEPO Auto Parts as a CAPA certified manufacturer of Part Nos. GM2502498 and GM2503498 for sale in the United States. *See* Exhibit 7.13. DEPO Auto Parts manufactures Part Nos. GM2502498 and GM2503498 in Taiwan for importation into the United States.

241. Part Nos. GM2502498C, GM2503498, and 60012 are substantially similar to the design claimed in the '025 patent. A claim chart that applies the '025 patent to representative products shows that Respondents infringe the '025 patent. *See* Exhibit 6.13.

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242. On information and belief, each Respondent identified in this subsection has had actual or constructive knowledge of the ’025 patent before this Complaint was filed.

N. Proposed Respondents Directly and/or Indirectly Infringe the ’155 Patent

243. At least Proposed Respondents LKQ, Best Value, Quality Collision, CCC, Mitchell, and Gordon, import, sell for importation, and/or sell within the United States after importation certain Accused Products that infringe the ’155 patent directly and/or indirectly.

244. For example, Part No. GM1240422C was purchased in the United States from LKQ utilizing CCC’s purchasing platform. *See* Exhibits 6.52-6.54. The LKQ sample was manufactured by Gordon in Taiwan and imported into the United States. *See id.* Part No. GM1240422 was also purchased in the United States from Best Value. *See* Exhibits 6.52-6.54. Best Value sources products from manufacturers in Taiwan and China such as Pro Fortune and Srumto. S*ee, e.g.*, Sections IV.D and IV.H. According to importation records, Best Value has been a consignee for aftermarket automotive parts shipped to the United States from ports of lading in Taiwan and China. *See* Exhibits 6.77-6.78. Accordingly, on information and belief, the Best Value sample was manufactured in Taiwan or China and imported into the United States. Part No. GM1240422 was also purchased in the United States from Quality Collision. *See* Exhibits 6.52-6.54. The Quality Collision sample was manufactured in China and imported into the United States. *See id.* Samples of the Accused Products are available upon request.

245. Purchased Part Nos. GM1240422C and GM1240422 are representative of at least Part Nos. GM1241422, as well as other infringing parts that are imported into the United States, sold for importation into the United States, and/or sold within the United States after importation.

246. Part No. GM1240422C is also listed as available for purchase in the United States from LKQ on the Mitchell purchasing platform. *See* Exhibit 7.34. Accordingly, Part No. GM1240422C that is listed on the Mitchell purchasing platform has, on information and belief,

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the same foreign manufacturer as Part Number GM1240422C that is listed on CCC's purchasing platform.

247. On its U.S. website, CAPA lists Taiwanese manufacturer Gordon as a CAPA certified manufacturer of Part Nos. GM1240422 and GM1241422 for sale in the United States. *See* Exhibit 7.14. Gordon manufactures Part Nos. GM1240422 and GM1241422 in Taiwan for importation into the United States.

248. Part Nos. GM1240422C and GM1240422 are substantially similar to the design claimed in the '155 patent. A claim chart that applies the '155 patent to representative products shows that Respondents infringe the '155 patent. *See* Exhibit 6.14.

249. On information and belief, each Respondent identified in this subsection has had actual or constructive knowledge of the '155 patent before this Complaint was filed.

O. Proposed Respondents Directly and/or Indirectly Infringe the '807 Patent

250. At least Proposed Respondents LKQ, Best Value, Quality Collision, CCC, Mitchell, Gordon, and Srumto, import, sell for importation, and/or sell within the United States after importation certain Accused Products that infringe the '807 patent directly and/or indirectly.

251. For example, Part No. GM1230483C was purchased in the United States from LKQ utilizing CCC's purchasing platform. *See* Exhibits 6.55-6.57. The LKQ sample was manufactured by Gordon in Taiwan and imported into the United States. *See id.* Part No. GM1230483 was also purchased in the United States from Best Value. *See* Exhibits 6.55-6.57. The Best Value sample was manufactured by Srumto in China and imported into the United States. *See id.* Part No. GM1230483 was also purchased in the United States from Quality Collision. *See* Exhibits 6.55-6.57. Quality Collision sources products from manufacturers in Taiwan and China such as AP and Srumto, *see* Sections IV.E and IV.I, and Part No. GM1230483 includes packaging with Simplified Chinese instructions, Exhibits 6.55-6.57. According to importation records, Quality Collision has

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been a consignee for aftermarket automotive parts shipped to the United States from ports of lading in Taiwan and China. *See* Exhibits 6.79-6.80. Accordingly, on information and belief, the Quality Collison sample was manufactured in Taiwan or China and imported into the United States. Samples of the Accused Products are available upon request.

252. Purchased Part Nos. GM1230483C and GM1230483 are representative of other infringing parts that are imported into the United States, sold for importation into the United States, and/or sold within the United States after importation.

253. Part No. GM1230483C is also listed as available for purchase in the United States from LKQ on the Mitchell purchasing platform. *See* Exhibit 7.35. Accordingly, Part No. GM1230483C that is listed on the Mitchell purchasing platform has, on information and belief, the same foreign manufacturer as Part Number GM1230483C that is listed on CCC's purchasing platform.

254. On its U.S. website, CAPA lists Taiwanese manufacturer Gordon as a CAPA certified manufacturer of Part No. GM1230483 for sale in the United States. *See* Exhibit 7.15. Gordon manufactures Part No. GM1230483 in Taiwan for importation into the United States.

255. Part Nos. GM1230483C and GM1230483 are substantially similar to the design claimed in the '807 patent. A claim chart that applies the '807 patent to representative products shows that Respondents infringe the '807 patent. *See* Exhibit 6.15.

256. On information and belief, each Respondent identified in this subsection has had actual or constructive knowledge of the '807 patent before this Complaint was filed.

P. Proposed Respondents Directly and/or Indirectly Infringe the '533 Patent

257. At least Proposed Respondents LKQ, Best Value, Quality Collision, CCC, Mitchell, and Gordon, import, sell for importation, and/or sell within the United States after importation certain Accused Products that infringe the '533 patent directly and/or indirectly.

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258. For example, Part No. GM1240418C was purchased in the United States from LKQ utilizing CCC's purchasing platform. *See* Exhibits 6.58-6.60. The LKQ sample was manufactured by Gordon in Taiwan and imported into the United States. *See id.* Part No. GM1240418 was also purchased in the United States from Best Value. *See* Exhibits 6.58-6.60. Best Value sources products from manufacturers in Taiwan and China such as Pro Fortune and Srumto. *See, e.g.*, Sections IV.D and IV.H. According to importation records, Best Value has been a consignee for aftermarket automotive parts shipped to the United States from ports of lading in Taiwan and China. *See* Exhibits 6.77-6.78. Accordingly, on information and belief, the Best Value sample was manufactured in Taiwan or China and imported into the United States. Part No. GM1240418 was also purchased in the United States from Quality Collision. *See* Exhibits 6.58-6.60. The Quality Collision sample was manufactured in China and imported into the United States. *See id.* Samples of the Accused Products are available upon request.

259. Purchased Part No. GM1240418 is representative of at least Part No. GM1241418, as well as other infringing parts that are imported into the United States, sold for importation into the United States, and/or sold within the United States after importation.

260. Part No. GM1240418C is also listed as available for purchase in the United States from LKQ on the Mitchell purchasing platform. *See* Exhibit 7.36. Accordingly, Part No. GM1240418C that is listed on the Mitchell purchasing platform has, on information and belief, the same foreign manufacturer as Part Number GM1240418 that is listed on CCC's purchasing platform.

261. On its U.S. website, CAPA lists Taiwanese manufacturer Gordon as a CAPA certified manufacturer of Part Nos. GM1240418 and GM1241418 for sale in the United States.

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See Exhibit 7.16. Gordon manufactures Part Nos. GM1240418 and GM1241418 in Taiwan for importation into the United States.

262. Part No. GM1240418 is substantially similar to the design claimed in the ’533 patent. A claim chart that applies the ’533 patent to representative products shows that Respondents infringe the ’533 patent. *See* Exhibit 6.16.

263. On information and belief, each Respondent identified in this subsection has had actual or constructive knowledge of the ’533 patent before this Complaint was filed.

Q. Proposed Respondents Directly and/or Indirectly Infringe the ’939 Patent

264. At least Proposed Respondents LKQ, Best Value, Quality Collision, CCC, and Grand HC, import, sell for importation, and/or sell within the United States after importation certain Accused Products that infringe the ’939 patent directly and/or indirectly.

265. For example, Part No. GM1002899DSC was purchased in the United States from LKQ utilizing CCC’s purchasing platform. *See* Exhibits 6.61-6.63. The LKQ sample was manufactured by Grand HC in Taiwan and imported into the United States. *See id.* Part No. GM1002899 was also purchased in the United States from Best Value. *See* Exhibits 6.61-6.63. Best Value sources products from manufacturers in Taiwan and China such as Pro Fortune and Srumto, *see, e.g.*, Sections IV.D and IV.H, and Part No. GM1002899 includes packaging with Simplified Chinese labeling, Exhibits 6.61-6.63. According to importation records, Best Value has been a consignee for aftermarket automotive parts shipped to the United States from ports of lading in Taiwan and China. *See* Exhibits 6.77-6.78. Accordingly, on information and belief, the Best Value sample was manufactured in Taiwan or China and imported into the United States. Part No. GM1002899 was also purchased in the United States from Quality Collision. *See* Exhibits 6.61-6.63. The Quality Collison sample was manufactured abroad and imported into the United States. *See id.* Samples of the Accused Products are available upon request.

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266. Purchased Part Nos. GM1002899DSC and GM1002899 are representative of other infringing parts that are imported into the United States, sold for importation into the United States, and/or sold within the United States after importation.

267. On its U.S. website, CAPA lists Taiwanese manufacturer Grand HC as a CAPA certified manufacturer of Part No. GM1002899 for sale in the United States. *See* Exhibit 7.17. Grand HC manufactures Part No. GM1002899 in Taiwan for importation into the United States.

268. Part Nos. GM1002899DSC and GM1002899 are substantially similar to the design claimed in the ’939 patent. A claim chart that applies the ’939 patent to representative products shows that Respondents infringe the ’939 patent. *See* Exhibit 6.17.

269. On information and belief, each Respondent identified in this subsection has had actual or constructive knowledge of the ’939 patent before this Complaint was filed.

R. Proposed Respondents Directly and/or Indirectly Infringe the ’239 Patent

270. At least Proposed Respondents LKQ, CCC, Mitchell, Best Value, Quality Collision, Forerunner, Grand HC, and Srumto import, sell for importation, and/or sell within the United States after importation certain Accused Products that infringe the ’239 patent directly and/or indirectly.

271. For example, Part No. GM1102569DSC was purchased in the United States from LKQ utilizing CCC’s purchasing platform. *See* Exhibits 6.64-6.66. The LKQ sample was manufactured by Grand HC in Taiwan and imported into the United States. *See id.* Part No. GM1102575 was also purchased in the United States from Best Value. *See* Exhibits 6.64-6.66. The Best Value sample was manufactured by Srumto in China and imported into the United States. *See id.* Part No. GM1102570 was also purchased in the United States from Quality Collision. *See* Exhibits 6.64-6.66. The Quality Collision sample was manufactured in China and imported into the United States. *See id.* Samples of the Accused Products are available upon request.

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272. Purchased Part Nos. GM1102569DSC, GM1102575, and GM1102570 are representative of at least Part Nos. GM1102569 and GM1102574, as well as other infringing parts that are imported into the United States, sold for importation into the United States, and/or sold within the United States after importation.

273. Part No. GM1102569DSC is also listed as available for purchase in the United States from LKQ on the Mitchell purchasing platform. *See* Exhibit 7.37. Accordingly, Part No. GM1102569DSC that is listed on the Mitchell purchasing platform has, on information and belief, the same foreign manufacturer as Part Number GM1102569DSC that is listed on CCC's purchasing platform.

274. On its U.S. website, CAPA lists Taiwanese manufacturer Forerunner as a CAPA certified manufacturer of Part Nos. GM1102569, GM1102570, GM1102574, and GM1102575 for sale in the United States. *See* Exhibit 7.18. CAPA's website further lists Taiwanese manufacturer Grand HC as a CAPA certified manufacturer of Part Nos. GM1102569, GM1102570, GM1102574, and GM1102575 for sale in the United States. *See* Exhibit 7.18. Forerunner and Grand HC manufacture Part Nos. GM1102569, GM1102570, GM1102574, and GM1102575 in Taiwan for importation into the United States.

275. Part Nos. GM1102569DSC, GM1102575, and GM1102570 are substantially similar to the design claimed in the '239 patent. A claim chart that applies the '239 patent to representative products shows that Respondents infringe the '239 patent. *See* Exhibit 6.18.

276. On information and belief, each Respondent identified in this subsection has had actual or constructive knowledge of the '239 patent before this Complaint was filed.

S. <u>Proposed Respondents Directly and/or Indirectly Infringe the '647 Patent</u>

277. At least Proposed Respondents LKQ, CCC, Mitchell, Best Value, Quality Collision, DEPO Group, and Srumto import, sell for importation, and/or sell within the United

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States after importation certain Accused Products that infringe the ’647 patent directly and/or indirectly.

278. For example, Part No. GM2502497C was purchased in the United States from LKQ utilizing CCC’s purchasing platform. *See* Exhibits 6.67-6.69. The LKQ sample was manufactured by DEPO Auto Parts in Taiwan and imported into the United States. *See id.* Part No. GM2502497 was also purchased in the United States from Best Value. *See* Exhibits 6.67-6.69. The Best Value sample was manufactured by Srumto in China and imported into the United States. *See id.* Part No. GM2502497 was also purchased in the United States from Quality Collision. *See* Exhibits 6.67-6.69. The Quality Collision sample was manufactured in China and imported into the United States. *See id.* Samples of the Accused Products are available upon request.

279. Purchased Part Nos. GM2502497C and GM2502497 are representative of at least Part Nos. GM2502500, GM2503497, and GM2503500, as well as other infringing parts that are imported into the United States, sold for importation into the United States, and/or sold within the United States after importation.

280. Part No. GM2502500 is also listed as available for purchase in the United States from LKQ on the Mitchell purchasing platform. *See* Exhibit 7.38. Part No. GM2502500 is substantially similar to Part No. GM2502497C. Accordingly, Part No. GM2502500 that is listed on the Mitchell purchasing platform has, on information and belief, the same foreign manufacturer as Part Number GM2502497C that is listed on CCC’s purchasing platform.

281. On its U.S. website, CAPA lists Taiwanese manufacturer DEPO Auto Parts as a CAPA certified manufacturer of Part Nos. GM2502497, GM2502500, GM2503497, and GM2503500 for sale in the United States. *See* Exhibit 7.19. DEPO Auto Parts manufactures Part

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Nos. GM2502497, GM2502500, GM2503497, and GM2503500 in Taiwan for importation into the United States.

282. Part Nos. GM2502497C and GM2502497 are substantially similar to the design claimed in the ’647 patent. A claim chart that applies the ’647 patent to representative products shows that Respondents infringe the ’647 patent. *See* Exhibit 6.19.

283. On information and belief, each Respondent identified in this subsection has had actual or constructive knowledge of the ’647 patent before this Complaint was filed.

T. Proposed Respondents Directly and/or Indirectly Infringe the ’803 Patent

284. At least Proposed Respondents LKQ, CCC, Mitchell, Best Value, ANTRC, and Pro Fortune import, sell for importation, and/or sell within the United States after importation certain Accused Products that infringe the ’803 patent directly and/or indirectly.

285. For example, Part No. GM1015152C was purchased in the United States from LKQ utilizing CCC’s purchasing platform. *See* Exhibits 6.70-6.71. The LKQ sample was manufactured by Pro Fortune in Taiwan and imported into the United States. *See id.* Part No. GM1015152 was also purchased in the United States from Best Value. *See* Exhibits 6.70-6.71. Best Value sources products from manufacturers in Taiwan and China such as Pro Fortune and Srumto. *See, e.g.*, Sections IV.D and IV.H. According to importation records, Best Value has been a consignee for aftermarket automotive parts shipped to the United States from ports of lading in Taiwan and China. *See* Exhibits 6.77-6.78. Accordingly, on information and belief, the Best Value sample was manufactured in Taiwan or China and imported into the United States. Samples of the Accused Products are available upon request.

286. Purchased Part Nos. GM1015152C and GM1015152 are representative of other infringing parts that are imported into the United States, sold for importation into the United States, and/or sold within the United States after importation.

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287. Part No. GM1015152C is also listed as available for purchase in the United States from LKQ on the Mitchell purchasing platform. *See* Exhibit 7.39. Accordingly, Part No. GM1015152C that is listed on the Mitchell purchasing platform has, on information and belief, the same foreign manufacturer as Part Number GM1015152C that is listed on CCC's purchasing platform.

288. On its U.S. website, CAPA lists Taiwanese manufacturer ANTRC as a CAPA certified manufacturer of Part No. GM1015152 for sale in the United States. *See* Exhibit 7.20. CAPA's website further lists Taiwanese manufacturer Pro Fortune as a CAPA certified manufacturer of Part No. GM1015152 for sale in the United States. *See* Exhibit 7.20. ANTRC and Pro Fortune manufacture Part No. GM1015152 in Taiwan for importation into the United States.

289. Part Nos. GM1015152C and GM1015152 are substantially similar to the design claimed in the '803 patent. A claim chart that applies the '803 patent to representative products shows that Respondents infringe the '803 patent. *See* Exhibit 6.20.

290. On information and belief, each Respondent identified in this subsection has had actual or constructive knowledge of the '803 patent before this Complaint was filed.

V. HARMONIZED TARIFF SCHEDULE NUMBERS

291. On information and belief, the Accused Products may be classified under at least one of the following headings of the Harmonized Tariff Schedule of the United States: 3926.90, 8414.90, 8703.23, 8708, 8708.10, 8708.29, 8708.70, 8708.91, 8708.99. These classifications are not intended to restrict the scope of any exclusion order or other remedy ordered by the Commission.

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VI. DOMESTIC INDUSTRY

292. As required by Section 337(a)(2) and defined by Section 337(a)(3), a domestic industry exists or is in the process of being established in the United States in connection with articles covered by the Asserted Patents.

A. Technical Prong

293. The GM vehicles (the "Protected Vehicles") and GM parts (the "Protected Parts") (collectively, the "DI Products") described below practice the Asserted Patents, establishing the technical prong as defined in 19 U.S.C. § 1337(a)(2).

294. The 2015-22 Chevrolet Colorado and its rear bumper practice the '997 patent. A claim chart demonstrating how a representative GM Protected Part (e.g., Part Nos. 84568267, 22890958, 22900984, 22900985, 22900986, 22900987, 23270263, and 23270264) practices the '997 patent is attached as Exhibit 8.1.

295. The 2016-19 Chevrolet Silverado and its front bumper practice the '815 patent. A claim chart demonstrating how the representative GM Protected Part (Part No. 84029801) practices the '815 patent is attached as Exhibit 8.2.

296. The 2016-19 Chevrolet Silverado and its front bumper practice the '816 patent. A claim chart demonstrating how the representative GM Protected Part (Part No. 84029793) practices the '816 patent is attached as Exhibit 8.3.

297. The 2016-19 Chevrolet Silverado and its front lower fascia practice the '301 patent. A claim chart demonstrating how the representative GM Protected Part (Part No. 84029800) practices the '301 patent is attached as Exhibit 8.4.

298. The 2019-26 Chevrolet Silverado and its hood practice the '247 patent. A claim chart demonstrating how the representative GM Protected Part (Part No. 84610675) practices the '247 patent is attached as Exhibit 8.5.

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299. The 2019-26 GMC Sierra and its hood practice the ’248 patent. A claim chart demonstrating how the representative GM Protected Part (Part No. 84610676) practices the ’248 patent is attached as Exhibit 8.6.

300. The 2019-26 GMC Sierra and its fenders practice the ’256 patent. A claim chart demonstrating how the representative GM Protected Part (Part No. 84496744) practices the ’256 patent is attached as Exhibit 8.7.

301. The 2019-26 Chevrolet Silverado and its rear bumper practice the ’703 patent. A claim chart demonstrating how the representative GM Protected Part (Part No. 84574365) practices the ’703 patent is attached as Exhibit 8.8.

302. The 2018-21 Chevrolet Traverse and its front upper bumper fascia practice the ’318 patent. A claim chart demonstrating how the representative GM Protected Part (Part No. 84088059) practices the ’318 patent is attached as Exhibit 8.9.

303. The 2019-22 Chevrolet Silverado and its bumper bar practice the ’874 patent. A claim chart demonstrating how the representative GM Protected Part (Part No. 84588804) practices the ’874 patent is attached as Exhibit 8.10.

304. The 2018-24 Chevrolet Traverse and its front fenders practice the ’406 patent. A claim chart demonstrating how the representative GM Protected Part (Part No. 85529813) practices the ’406 patent is attached as Exhibit 8.11.

305. The 2019-25 Chevrolet Malibu and its front bumper practice the ’114 patent. A claim chart demonstrating how the representative GM Protected Part (Part No. 84543709) practices the ’114 patent is attached as Exhibit 8.12.

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306. The 2019-25 Chevrolet Malibu and its front headlamps practice the ’025 patent. A claim chart demonstrating how the representative GM Protected Part (Part No. 84680167) practices the ’025 patent is attached as Exhibit 8.13.

307. The 2021-26 GMC Yukon/Yukon XL and its fenders practice the ’155 patent. A claim chart demonstrating how the representative GM Protected Part (Part No. 84384208) practices the ’155 patent is attached as Exhibit 8.14.

308. The 2021-26 Chevrolet Tahoe and its hood practice the ’807 patent. A claim chart demonstrating how the representative GM Protected Part (Part No. 85112715) practices the ’807 patent is attached as Exhibit 8.15.

309. The 2021-26 Chevrolet Tahoe and its fenders practice the ’533 patent. A claim chart demonstrating how the representative GM Protected Part (Part No. 84384210) practices the ’533 patent is attached as Exhibit 8.16.

310. The 2022-26 GMC Sierra and its front bumper practice the ’939 patent. A claim chart demonstrating how the representative GM Protected Part (Part No. 84878740) practices the ’939 patent is attached as Exhibit 8.17.

311. The 2019-26 GMC Sierra and its rear bumper practice the ’239 patent. A claim chart demonstrating how the representative GM Protected Part (Part No. 84564756) practices the ’239 patent is attached as Exhibit 8.18.

312. The 2019-22 Chevrolet Silverado and its front headlamps practice the ’647 patent. A claim chart demonstrating how the representative GM Protected Part (Part No. 85567926) practices the ’647 patent is attached as Exhibit 8.19.

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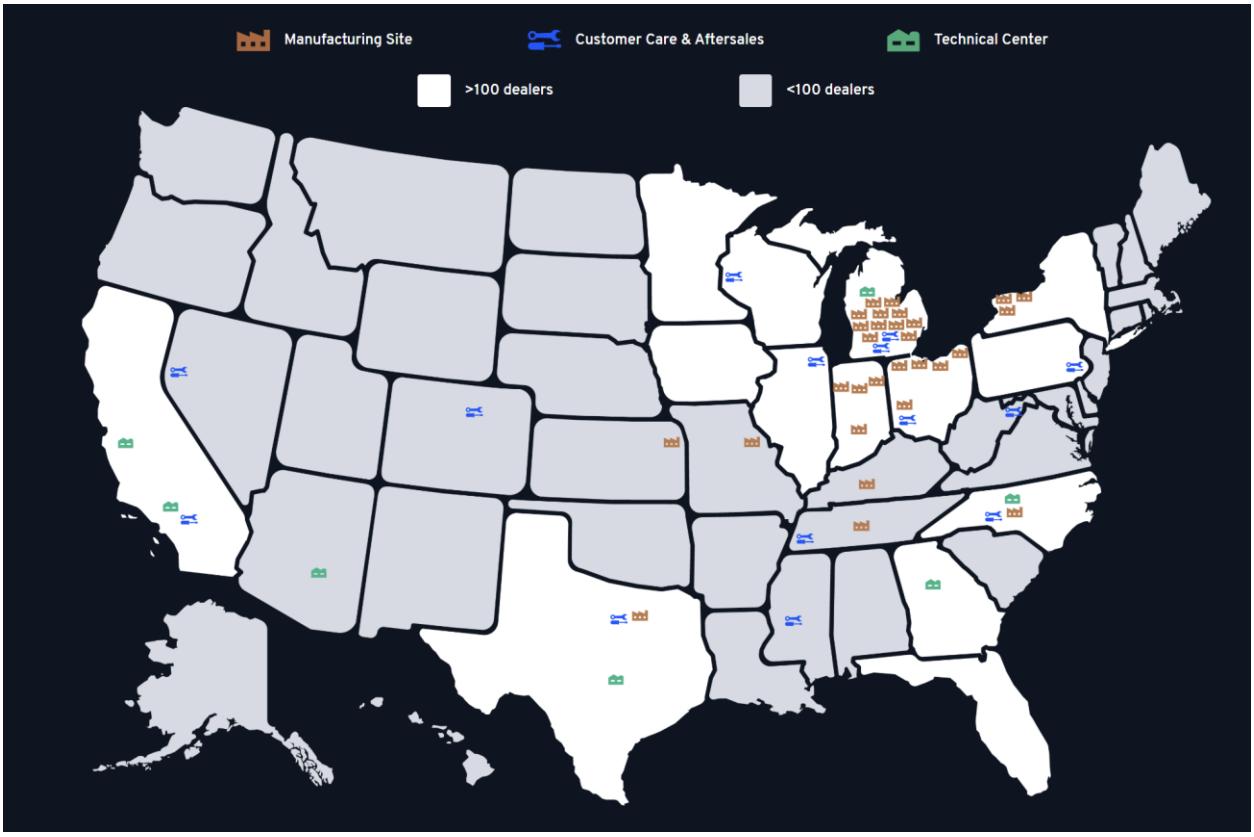
313. The 2019-25 Chevrolet Malibu and its front lower bumper fascia practice the ’803 patent. A claim chart demonstrating how the representative GM Protected Part (Part No. 84584222) practices the ’803 patent is attached as Exhibit 8.20.

314. Samples of the Protected Parts are available on request. *See*, *e.g.*, Exhibits 8.34-8.53.

B. <u>Economic Prong</u>

315. A domestic industry, under subparagraphs (A) and (B) of section 337(a)(3), exists by virtue of GM’s significant domestic investments in plant and equipment and significant employment of U.S. labor and capital, respectively.

316. GM operates numerous manufacturing sites, distribution centers, technical centers, and its corporate headquarters in the United States. GM facilities are depicted below:



See Exhibit 3.1.

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317. GM engineers, researches, and designs vehicles and vehicle parts, including the Protected Vehicles and Protected Parts, in the United States.

318. GM assembles Protected Vehicles at its assembly plants in the United States. Specifically, GM assembles, and has assembled, the Protected Vehicles at its plants in Arlington, Texas; Kansas City, Kansas (Fairfax); Roanoke, Indiana (Fort Wayne); Lansing, Michigan; and Wentzville, Missouri. *See* Exhibit 9.1 (Valenzuela Declaration), ¶ 8. GM has directly invested billions of dollars in constructing, equipping, and operating these plants in the United States. *Id.*, ¶¶ 9-23. Likewise, GM has invested billions of dollars annually in labor and capital—in salaries, benefits, and materials, for example—to manufacture the Protected Vehicles in the United States. *Id*.

319. By way of example, GM's Arlington, Texas plant, which recently produced its 13th million vehicle and celebrated its 70th anniversary, is shown below:

See Exhibit 3.4.

As of November 2024, GM employed 5,200 people in its Arlington plant alone. Exhibit 3.5. Employees celebrating the Arlington plant's 70th anniversary are shown below:

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See Exhibit 3.5.

320. GM and trusted domestic suppliers manufacture the Protected Parts at multiple facilities in the United States. *See, e.g.*, Exhibit 9.1, ¶ 24. GM has invested billions of dollars in U.S. manufacturing operations. For example, GM owns and operates assembly plants and manufacturing equipment in the United States that transform input materials, such as sheet metal, into a finished part, such as a vehicle hood. *Id.*, ¶¶ 8, 10-23, 24, 91, 112, 119, 126, 140, 154. Additionally, GM has made billions of dollars in U.S. manufacturing investments by purchasing Protected Parts from trusted suppliers in the United States. *Id.*, ¶¶ 24, 28-90, 98-111, 133-139, 147-153. As with the Protected Vehicles, GM has invested, through its operations and its suppliers' operations, millions of dollars annually in labor or capital associated with manufacturing the Protected Parts in the United States. *Id.*, ¶¶ 24-159.

321. After a new vehicle is sold, GM supports that vehicle through its aftersales operations. Exhibit 9.1, ¶¶ 26, 160-162, 172-175. For example, when a vehicle has been damaged and needs repair, GM supplies service parts, including the Protected Parts, to dealers and

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authorized repair shops, who fix the damaged vehicle in the United States. *Id.*, ¶¶ 7, 174-175. GM supports its vehicles, including the Protected Vehicles, for multiple years after their model year, because consumers expect to be able to obtain replacement parts many years after they have purchased a vehicle. *Id.*, ¶ 26. To support these operations, GM has made significant investments in its United States distribution centers, including in a skilled workforce that projects demand, distributes products, and obtains and maintains on-hand inventory. *Id.*, ¶¶ 7, 160-171.

322. GM also supports each Protected Part through sales, marketing, distribution, and warranty activities in the United States. *Id.*, ¶¶ 6-7, 26, 174. For example, GM warrants its vehicles and service parts, including the Protected Vehicles and Protected Parts, and it invests in the United States-based facilities and employees needed to honor those warranties. *See* Exhibit 3.6.

323. By way of example, GM's Davison Road distribution center is shown below:

Davison Road Processing Center (Google Maps)

See Exhibit 3.7.

324. GM has recently invested over $100 million dollars in its Customer Care and Aftersales (CCA) facilities, including the Davison Road facility shown above. *See* Exhibit 3.8.

325. A significant portion of GM's activities relating to the Protected Vehicles and Protected Parts occurs in the United States—this includes the design, development, manufacturing,

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marketing, sales, assembly, warehousing, and distribution of the Protected Vehicles and Protected Parts. GM's domestic investments and activities are significant under Section 337. These includes investments in the (A) plant and equipment and (B) labor or capital for the assembly of the Protected Vehicles in GM's US facilities, and in the manufacture of the Protected Parts in the United States. These investments are significant both in absolute terms and relative to GM's other domestic assembly and manufacturing operations and GM's non-domestic operations relating to the Protected Vehicles and Protected Parts. GM's investments in the Protected Vehicles and Protected Parts are vital to GM's business with respect to these products and represent significant added value to customers and GM's business as a whole.

VII. RELATED LITIGATION

326. One or more of the Asserted Patents has been the subject of at least the following concurrently filed litigations in United States District Court: *General Motors LLC et al. v. Best Value Auto Body Supply et al*., 1:16-cv-01223 (N.D. Ill.); *General Motors LLC et al. v. Mitchell Int'l, Inc.*, No. 1:99-mc-09999 (D. Del.); *General Motors LLC et al. v. Quality Collision Parts, Inc. et al.*, No. 2:26-cv-10391 (E.D. MI.); *General Motors LLC et al. v. LKQ Corp. et al.*, No. 1:26-cv-01233 (N.D. Ill.).

327. In addition, LKQ is seeking a declaratory judgment of noninfringement and invalidity of the '256 and '406 patents before the United States District Court for the Northern District of Illinois in the case captioned *LKQ Corp. and Keystone Automotive Indus., Inc. v. General Motors Co., GM Global Tech. Operations, LLC, and General Motors LLC*, No. 1:21-cv-5854 (N.D. Ill.), which was filed on November 2, 2021, and is currently pending.

328. LKQ also challenged the validity of the '703 patent before the United States Patent Office Patent Trial and Appeal Board, in a petition for post grant review captioned *LKQ Corp. and Keystone Automotive Indus., Inc. v. GM Global Tech. Operations, LLC* (PGR2020-00003), which

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was filed on October 17, 2019, and has been terminated. The Board denied LKQ's petition for post grant review on April 16, 2021.

329. The '114 and '025 patents are being asserted in the United States District Court for the Eastern District of Michigan, in the case captioned *GM Glob. Tech. Operations, LLC v. Quality Collision Parts, Inc.* (2-23-cv-13026), which was filed on November 29, 2023, and is currently pending.

330. Apart from these matters, the specific unfair methods of competition and unfair acts alleged in this complaint, including subject matter thereof, have not been the subject of any other court or agency litigation, or of any arbitration.

VIII. GENERAL EXCLUSION ORDER

331. In accordance with Rule 210.12(a)(11), the Commission should, per 19 U.S.C. § 1337(d)(2), issue a general exclusion order ("GEO") excluding all products that infringe the Asserted Patents because a GEO is needed to: (A) prevent circumvention of a limited exclusion order ("LEO"); and/or (B) remedy a pattern of violation of Section of 337 where it is difficult to identify the source of infringing products.

332. Infringing vehicle parts, as detailed above and in the charts accompanying this Complaint, are sold for importation into the United States, imported, and/or sold in the United States after importation by various means, including the internet.

333. Infringing parts, including Accused Products, are readily available from a variety of sources through various e-commerce channels, which readily enable companies to conceal the source of the infringing products. This reality, coupled with the low barrier to entry to sell products over the internet, suggests that named Respondents, unnamed entities, and entities that do not currently exist could circumvent an LEO. Likewise, the use of non-descript packaging and

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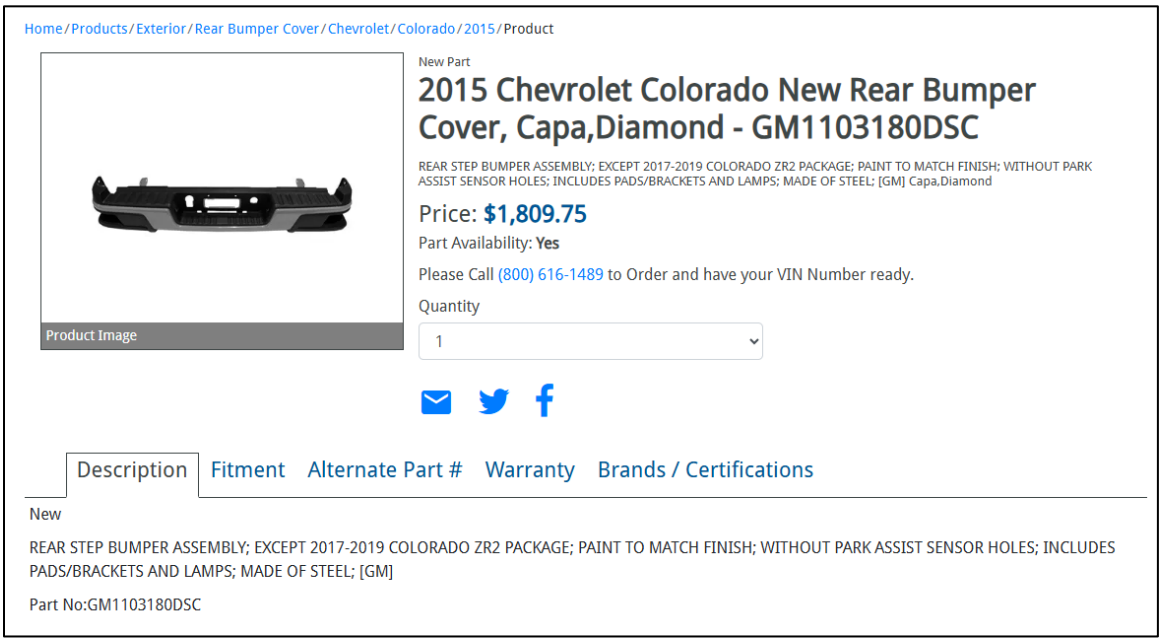
continued demand for service parts indicates that various entities are likely to circumvent an LEO, should LEOs issue. *See, e.g.*, Exhibit 6.63.

334. Although multiple entities import the Accused Products, sell them for importation, and/or sell them after importation, it is difficult to determine the source of infringing products. For example, the Distributor Respondents do not allow a customer or end user to select which manufacturers' Accused Product they are purchasing. LKQ's website provides a search function that allows consumers to locate replacement automotive parts. *See* Exhibit 10.1. Searching LKQ's website for a rear bumper cover for a 2015 Chevrolet Colorado produces a listing of available parts:



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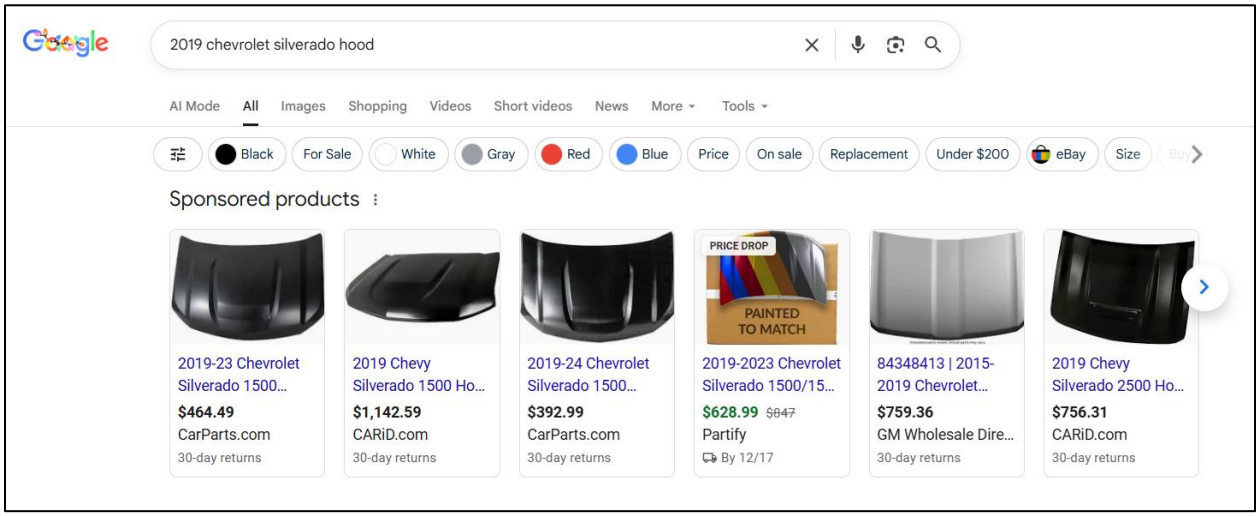
See, e.g., Exhibit 10.2. But the listing provides only a description, pricing, availability, fitment, and certification information. Information detailing the part's manufacturer or country of origin is not provided. *See id.*

335. Other Distributor Respondents, including Best Value and Quality Collision, also do not provide information about who manufactures each of the Accused Products they sell. *See generally* Exhibit 4.6 (https://www.bestvaluepart.com/); Exhibit 4.11 (https://www.power autoparts.com/); Exhibit 4.12 (https://www.qualityautomotiveparts.com/). When a customer purchases a product from a Distributor Respondent or uses a purchasing platform, they have no ability to select the specific manufacturer from which a given part is sourced. Accordingly, a GEO is necessary to prevent circumvention of a LEO and it is difficult to identify the source of infringing products.

336. Additionally, Google searches for a "2019 Chevrolet Silverado hood" and a "2024 Chevrolet Tahoe Fender" show that multiple entities, in addition to the Proposed Respondents, are selling the Accused Products:



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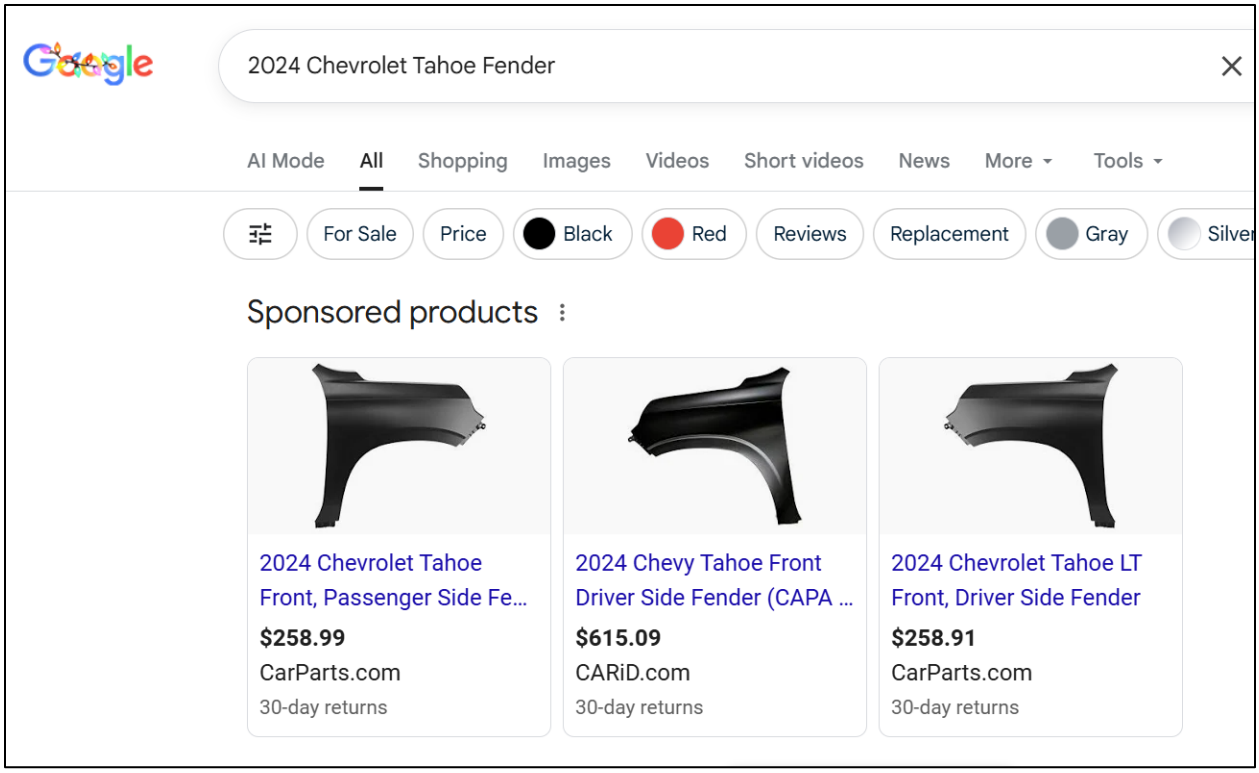

CarParts.com, CariD.com, Partify, and other similar entities do not identify who manufactured the parts being sold, nor do they identify where the parts being sold are made. Thus, if LEOs were issued, entities such as CarParts.com, CariD.com, or Partify could circumvent them by switching manufacturers or by continuing to conceal the source of the products they are selling.

337. Further, multiple other purveyors sell Accused Products on Amazon. These purveyors include, without limitation, VRC, KUAFU, Auto Dynasty, US Auto Parts, CAREONLINE, LYZ, ECOTRIC, BUMPERS THAT DELIVER, GXYWADY, ALMULOO, HECASA, FitParts, KarParts360, JX RACING, KOOLZAP, CNNELL, Replace/Auto Accessory Depot, Misakomo, and ELECANE. *See* Exhibit 10.3. For example, CNNELL sells a Tahoe fender:

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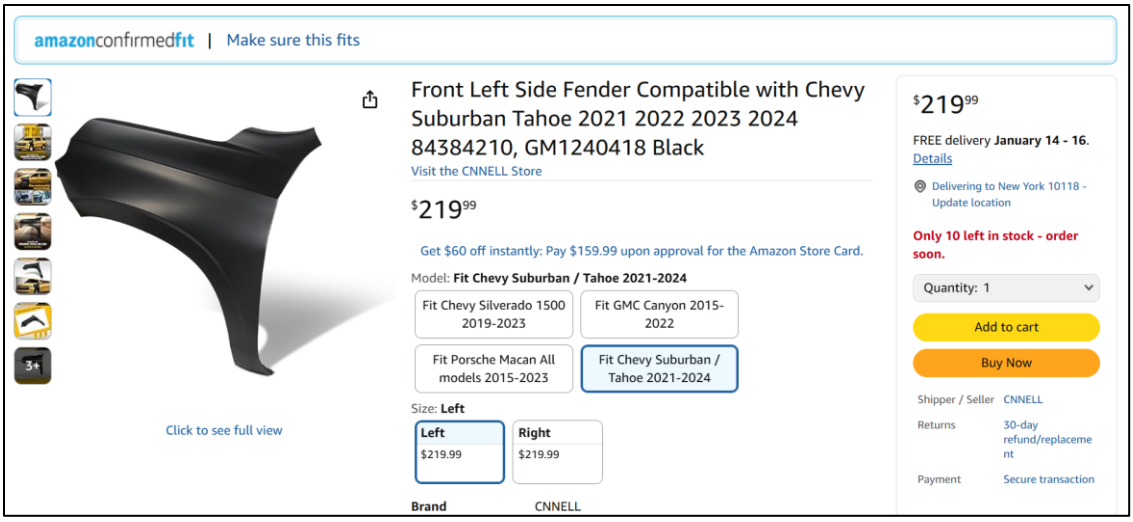
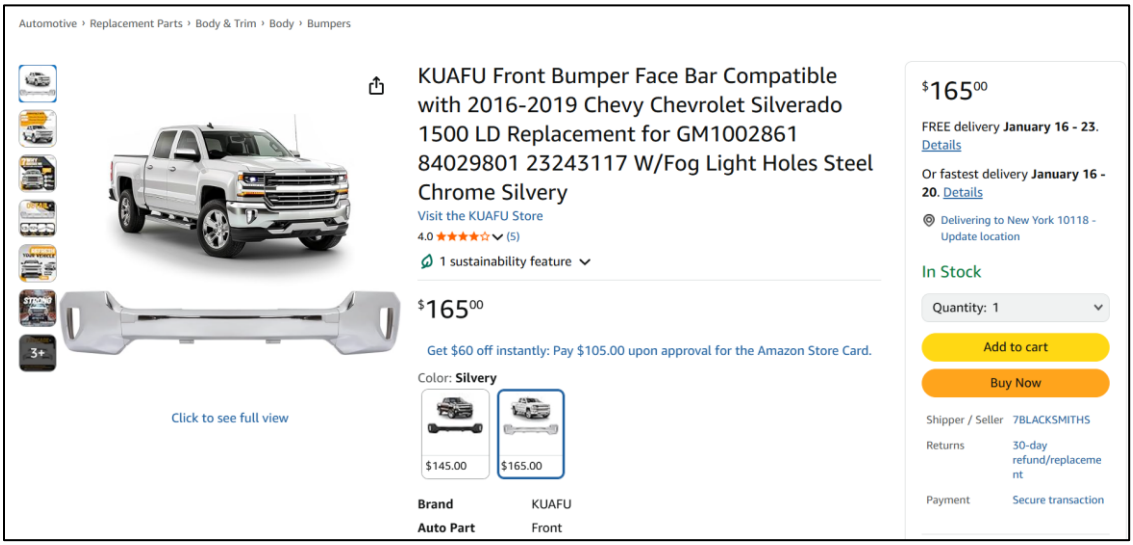


Id. Similarly, KUAFU sells a Silverado front bumper:



Id. The purveyors listed above, and many others, do not disclose who manufactured the products being sold or the products' country of origin. Thus, if LEOs were issued, these purveyors could circumvent the LEOs by switching manufacturers or by continuing to conceal the source of the products they are selling.

338. The presence of the Respondents identified above, various internet sellers, and Amazon purveyors in the marketplace, alone or in combination with each other, indicates a widespread pattern of violation of Section 337. Further, as detailed above, multiple entities sell

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infringing products, and thus, a GEO is necessary to prevent circumvention of a GEO and there is a pattern of violation of Section 337 and it is difficult to identify the source of infringing products.

IX. REQUESTED RELIEF

339. WHEREFORE, by reason of the foregoing, GM requests that the United States International Trade Commission:

(a) Institute an investigation, pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337, with respect to violations of Section 337 based on the Proposed Respondents' unlawful importation into the United States, sale for importation into the United States, and/or sale within the United States after importation of certain vehicle parts, components thereof, and vehicles containing the same that infringe one or more of the Asserted Patents;

(b) Schedule and conduct a hearing on the unlawful acts and, following the hearing, determine that there has been a violation of Section 337;

(c) Issue a permanent general exclusion order, pursuant to Section 337(d) of the Tariff Act of 1930, as amended, excluding from entry into the United States certain vehicle parts, components thereof, and vehicles containing the same that infringe one or more of the Asserted Patents;

(d) Issue permanent limited exclusion orders, pursuant to Section 337(d) of the Tariff Act of 1930, as amended, excluding from entry into the United States all of the Proposed Respondents' vehicle parts, components thereof, and vehicles containing the same that infringe one or more of the Asserted Patents;

(e) Issue permanent cease and desist orders, pursuant to Section 337(f) of the Tariff Act of 1930, as amended, directing each Proposed Respondent to cease and desist from the importation, marketing, advertising, demonstrating, warehousing inventory for distribution, sale

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and use of vehicle parts, components thereof, and vehicles containing the same that infringe one or more of the Asserted Patents;

(f) Impose a bond upon each Proposed Respondent to the extent it continues to import infringing articles during the 60-day Presidential Review Period per 19 U.S.C. § 1337(j); and

(g) 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.

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Dated: February 4, 2026

Respectfully submitted,

/s/ Joseph A. Herriges

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UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

In the Matter of **CERTAIN VEHICLE PARTS, COMPONENTS THEREOF, AND VEHICLES CONTAINING SAME**	**Investigation No. 337-TA-_____**

VERIFICATION OF COMPLAINT

I, Dante Valenzuela, declare, in accordance with 19 C.F.R. §§ 210.4 and 210.12(a), under penalty of perjury under the laws of the United States of America, that the following statements are true and correct:

1. I am a Finance Manager at General Motors, and I am duly authorized to sign this Complaint on behalf of General Motors;

2. I have read the foregoing Complaint and am aware of its contents;

3. To the best of my knowledge, information, and belief, based upon reasonable inquiry, the foregoing Complaint is well-founded in fact and is warranted by existing law or by a non-frivolous argument for the extension, modification, or reversal of existing law or the establishment of new law;

4. The allegations or other factual contentions have evidentiary support or are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery; and

5. The foregoing Complaint is not being filed for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation.

_____
Dante Valenzuela

Date: FEB 4 2026