PUBLIC VERSION

UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

Before the Honorable David P. Shaw
Administrative Law Judge

In the Matter of **CERTAIN TONER SUPPLY CONTAINERS AND COMPONENTS THEREOF**	))))))	**Investigation No. 337-TA-1259**

RESPONSE OF EASY GROUP, LLC TO COMPLAINT OF CANON INC., CANON U.S.A., INC., AND CANON VIRGINIA, INC. AND NOTICE OF INVESTIGATION UNDER SECTION 337

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Respondent

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Facsimile: None

Respondent Easy Group, LLC. ("Easy Group" or "Respondent") hereby submits the following Response to the Complaint of Canon Inc., Canon U.S.A., Inc., and Canon Virginia, Inc. ("Canon" or "Complainant") under Section 337 of the Tariff Act of 1930, as amended ("Complaint") and the Commission's Notice of Investigation.

Respondent sets forth below its responses to each individual paragraph of the Complaint and Notice of Investigation. The headings set forth below repeat the headings in the Complaint and are not intended to be construed as an admission of any fact relating thereto.

I. INTRODUCTION AND PLAIN-ENGLISH IDENTIFICATION OF ACCUSED PRODUCTS[1]

1. Respondent admits that Canon Inc., Canon U.S.A. Inc., and Canon Virginia, Inc. ("Canon") have filed a Complaint pursuant to Section 337 alleging infringement of their patents. Respondent denies that it has violated Section 337 and denies the remaining allegations set forth in this paragraph.

2. Respondent admits that Canon has grouped the proposed Respondents into four groups as set forth in this paragraph: Respondent lacks information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph, and therefore denies those allegations.

3. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

4. Respondent admits that Canon seeks a general exclusion order or, alternatively, a limited exclusion order, as well as cease and desist orders, in its Complaint. Respondent denies that it infringes any valid and enforceable claim asserted by Canon. Respondent lacks

[1] Respondent interprets "Accused Toner Supply Containers" to mean those Easy Group products accused of infringement in Canon's Complaint. Respondent denies that any of its activities related to such products infringe any of the asserted claims of the asserted patents.

information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph, and therefore denies those allegations.

II. THE PARTIES

A. Complainants

5. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

6. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

7. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

8. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

B. Proposed Respondents

1. Ninestar Respondents

9. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

10. Respondent admits that Canon has grouped the proposed Ninestar Respondents into two groups as set forth in this paragraph.

11. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

12. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

13. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

a. Ninestar Corporation

14. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

b. Ninestar Image Tech Limited ("Ninestar Image")

15. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

c. Ninestar Technology Company, Ltd. ("Ninestar Tech")

16. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

d. Static Control Components, Inc. ("Static Control")

17. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

2. GPI Respondents

18. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

a. General Plastic Industrial Co. Ltd. ("GPI")

19. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

b. Katun Corporation ("Katun")

20. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

3. Wiztoner Respondents

21. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

22. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

23. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

24. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

a. Sichuan XingDian Technology Co., Ltd. ("Sichuan XingDian")

25. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

b. Sichuan Wiztoner Technology Co., Ltd. ("Sichuan Wiztoner")

26. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

4. Other Respondents

a. Anhuiyatengshangmaoyouxiangongsi ("Yatengshang")

27. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

b. ChengDuXiangChangNanShiYouSheBeiYouXianGongSi ("ChengDuXiang")

28. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

c. Copier Repair Specialists, Inc. ("Copier Repair Specialists")

29. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

d. Digital Marketing Corporation d/b/a Digital Buyer Marketing Company ("Digital Buyer")

30. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

e. Do It Wiser LLC d/b/a Image Toner ("Do It Wiser")

31. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

f. Easy Group, LLC

32. Respondent admits that Easy Group is a limited liability company organized in California whose principal place of business is located at 4981 Irwindale Ave., Suite 200, Irwindale, California 91706; that it has in the past been engaged in the sale of some of the accused toner supply containers; and that it conducts activities via the Internet at least as cartridgeamerica.com, 499inks.com, 123refills.com, and atlanticinkjet.com. The remaining allegations set forth in this Paragraph are denied.

g. Hefeierlandianzishangwuyouxiangongsi ("Erlandianzishang")

33. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

h. Ink Technologies Printer Supplies, LLC ("Ink Tech")

34. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

i. Kuhlmann Enterprises, Inc. d/b/a Precision Roller ("Precision Roller")

35. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

j. LD Products, Inc. ("LD Products")

36. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

k. NAR Cartridges

37. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

l. Shenzhenshi Keluodeng Kejiyouxiangognsi ("KenoGen")

38. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

m. Sun Data Supply, Inc. ("Sun Data Supply")

39. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

n. The Supplies Guys, LLC ("Supplies Guys")

40. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

o. MITCOLOR INC. ("TopInk")

41. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

p. Xianshi yanliangqu canqiubaihuodianshanghang ("CJ-us")

42. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

q. Zhuhai Henyun Image Co., Ltd. ("Zhuhai Henyun")

43. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

r. Zinyaw LLC d/b/a TonerPirate.com and Supply District ("Zinyaw")

44. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

III. THE PRODUCTS AT ISSUE

45. Respondent admits that the products at issue in this investigation include toner supply containers for use in copy machines, including Canon copy machines. Respondent lacks information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph, and therefore denies those allegations.

46. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

47. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

48. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

49. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

50. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

51. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

52. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

53. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

54. Respondent admits that Easy Group has been involved in the sale in the United States of some of the accused toner supply containers. The allegations set forth in Paragraph 54 are otherwise denied as to Easy Group. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph as to other parties, and therefore denies those allegations.

55. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph as to other parties, and therefore denies those allegations.

56. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph as to other parties, and therefore denies those allegations.

IV. THE ASSERTED PATENTS AND NON-TECHNICAL DESCRIPTIONS OF THE INVENTIONS

A. The Asserted Patents

57. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

1. The Group I Patents

a. U.S. Patent No. 10,209,667

58. The allegations set forth in this paragraph are admitted according to the face of the patent.

59. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

b. U.S. Patent No. 10,289,060

60. The allegations set forth in this paragraph are admitted according to the face of the patent.

61. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

c. U.S. Patent No. 10,289,061

62. The allegations set forth in this paragraph are admitted according to the face of the patent.

63. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

d. U.S. Patent No. 10,295,957

64. The allegations set forth in this Paragraph are admitted according to the face of the patent.

65. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

e. U.S. Patent No. 10,488,814

66. The allegations set forth in this Paragraph are admitted according to the face of the patent.

67. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

f. U.S. Patent No. 10,496,032

68. The allegations set forth in this Paragraph are admitted according to the face of the patent.

69. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

g. U.S. Patent No. 10,496,033

70. The allegations set forth in this Paragraph are admitted according to the face of the patent.

71. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

h. U.S. Patent No. 10,514,654

72. The allegations set forth in this Paragraph are admitted according to the face of the patent.

73. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

i. U.S. Patent No. 10,520,881

74. The allegations set forth in this Paragraph are admitted according to the face of the patent.

75. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

j. U.S. Patent No. 10,520,882

76. The allegations set forth in this Paragraph are admitted according to the face of the patent.

77. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

2. The Group II Patents

a. U.S. Patent No. 8,565,649

78. The allegations set forth in this Paragraph are admitted according to the face of the patent.

79. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

b. U.S. Patent No. 9,354,551

80. The allegations set forth in this Paragraph are admitted according to the face of the patent.

81. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

c. U.S. Patent No. 9,753,402

82. The allegations set forth in this Paragraph are admitted according to the face of the patent.

83. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

B. Non-Technical Descriptions of the Inventions

84. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

1. The Group I Patents

85. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

86. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

87. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

88. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

89. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

90. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

91. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

92. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

2. <u>The Group II Patents</u>

93. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

94. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

95. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

96. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

97. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

C. Corresponding Patents and Patent Applications

1. The Group I Patents

98. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

99. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

2. The Group II Patents

100. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

101. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

102. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

D. Licenses

103. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

V. UNLAWFUL AND UNFAIR ACTS OF THE RESPONDENTS – PATENT INFRINGEMENT

104. Respondent admits that Easy Group has been involved in the sale in the United States of some of the accused toner supply containers. The allegations set forth in Paragraph 104 are otherwise denied as to Easy Group. Respondent lacks information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph as to other parties, and therefore denies those allegations.

105. Respondent admits that Easy Group has been involved in the sale in the United States of some or the accused toner supply containers. The allegations set forth in Paragraph 105 are otherwise denied as to Easy Group. Respondent lacks information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph as to other parties, and therefore denies those allegations.

106. Respondent admits that Easy Group has been involved in the sale in the United States of some of the accused toner supply containers. The allegations set forth in Paragraph 106 are otherwise denied as to Easy Group. Respondent lacks information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph as to other parties, and therefore denies those allegations.

107. Respondent admits that it received copies of the ITC complaint and the district court complaint naming it as a defendant. The allegations set forth in paragraph 107 are otherwise denied as to Easy Group. Respondent lacks information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph as to other parties, and therefore denies those allegations.

108. Respondent admits that Easy Group has been involved in the sale in the United States of some of the accused toner supply containers. The allegations set forth in Paragraph 108 are otherwise denied as to Easy Group. Respondent lacks information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph as to other parties, and therefore denies those allegations.

A. <u>Representative Accused Toner Supply Containers</u>

1. <u>Supplies Guys (Ninestar) Model NCGPR55K Toner Supply Container</u>

109. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

110. Respondent denies that it infringes any valid and enforceable claim asserted by Canon. Respondent lacks information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph, and therefore denies those allegations.

2. NAR Cartridges (GPI) Model D28CAC250BA-K Toner Supply Container

111. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

112. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

3. Do It Wiser Model 08-08.9-ITCANON2235K1 Toner Supply Container

113. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

114. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

4. Digital Buyer Model CCGPR53K Toner Supply Container

115. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

116. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

5. Precision Roller Model 8524B003AA Toner Supply Container

117. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

118. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

6. CJ-us Model GPR58K

119. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

120. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

121. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

B. Ninestar Respondents

122. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

123. Respondent denies that it infringes any valid and enforceable claim asserted by Canon. Respondent lacks information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph, and therefore denies those allegations.

124. Respondent denies that it infringes any valid and enforceable claim asserted by Canon. Respondent lacks information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph, and therefore denies those allegations.

C. GPI Respondents

125. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

126. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

127. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

D. <u>Wiztoner Respondents</u>

128. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

129. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

130. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

E. <u>Other Retailer Respondents</u>

131. Respondent admits that Easy Group is involved in the sale in the United States of some of the accused toner supply containers. The allegations set forth in Paragraph 131 are otherwise denied as to Easy Group. Respondent lacks information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph as to other parties, and therefore denies those allegations.

132. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

133. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

134. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

135. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

136. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

137. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

138. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

139. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

140. Respondent admits that it has in the past sold the Toner Container Models identified in Paragraph 140 of the Complaint. Respondent lacks information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph, and therefore denies those allegations.

141. Respondent denies that it infringes any valid and enforceable claim asserted by Canon. Respondent lacks information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph, and therefore denies those allegations.

142. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

143. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

144. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

145. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

146. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

147. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

148. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

149. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

150. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

151. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

152. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

153. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

154. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

155. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

156. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

157. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

158. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

159. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

160. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

161. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

162. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

163. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

164. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

165. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

166. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

167. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

168. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

VI. SPECIFIC INSTANCES OF IMPORTATION AND SALE

169. Respondent admits that Easy Group has been involved in the sale in the United States of some of the accused toner supply containers. Easy Group denies that its products infringe any valid and enforceable claim asserted by Canon. Respondent lacks information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph, and therefore denies those allegations.

A. Ninestar Toner Supply Containers

170. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

171. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

172. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

173. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

174. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

175. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

176. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

1. Specific Instances of Importation and/or Sale of Ninestar Toner Supply Containers by the Ninestar Respondents

177. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

178. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

179. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

2. Specific Instances of Importation and/or Sale of Ninestar Toner Supply Containers by Other Retailer Respondents

180. Respondent admits that Easy Group has been involved in the sale in the United States of some of the accused toner supply containers. Respondent lacks information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph, and therefore denies those allegations.

a. Easy Group

181. Respondent admits that Easy Group has been involved in the sale in the United States of some of the accused toner supply containers. Easy Group denies that its products infringe. Respondent lacks information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph, and therefore denies those allegations.

b. Ink Tech

182. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

c. LD Products

183. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

d. Sun Data Supply

184. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

e. Supplies Guys

185. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

f. Copier Repair Specialists

186. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

g. Zinyaw

187. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

B. GPI Toner Supply Containers

188. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

189. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

190. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

191. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

192. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

193. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

194. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

1. Specific Instances of Importation and/or Sale of GPI Toner Supply Containers by Katun

195. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

196. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

2. Specific Instances of Importation and/or Sale of GPI Toner Supply Containers by Other Retailer Respondents

197. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

a. NAR Cartridges

198. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

b. Sun Data Supply

199. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

C. Wiztoner Toner Supply Containers

200. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

201. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

202. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

1. Specific Instances of Importation and/or Sale of Wiztoner Toner Supply Containers by the Wiztoner Respondents

203. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

204. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

205. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

206. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

207. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

208. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

209. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

210. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

211. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

212. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

213. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

214. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

D. Toner Supply Containers of Unknown Foreign Origin

215. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

1. Yatengshang

216. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

2. ChengDuXiang

217. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

3. Digital Buyer

218. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

4. Erlandianzishang

219. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

5. Precision Roller

220. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

6. KenoGen

221. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

7. TopInk

222. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

8. CJ-us

223. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

9. Zhuhai Henyun

224. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

225. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

10. Do It Wiser

226. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

227. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

228. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

229. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

230. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

231. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

232. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

VII. DOMESTIC INDUSTRY

233. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

A. Economic Prong

1. Significant Investment in Plant and Equipment

234. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

235. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

236. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

237. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

238. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

239. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

240. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

241. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

242. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

243. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

244. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

2. Significant Employment of Labor and Capital

245. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

246. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

247. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

248. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

B. Technical Prong

249. Respondent lacks information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph, and therefore denies those allegations.

VIII. HARMONIZED TARIFF SCHEDULE ITEM NUMBERS

250. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

IX. RELATED LITIGATION

A. U.S. Proceedings

251. Respondent admits that Complainant Canon Inc. filed a civil action against Easy Group in the Central District of California as set forth in this Paragraph. Respondent lacks information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph, and therefore denies those allegations.

252. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

X. GENERAL EXCLUSION ORDER

253. Respondent admits that Canon seeks a general exclusion order as part of its relief but denies that Canon is entitled to such relief.

254. The first sentence of this paragraph is a quote from the statute which requires no response. Respondent lacks information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph, and therefore denies those allegations.

A. Circumvention of Limited Exclusion Orders

1. Masking of Identities and Product Source

255. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

256. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

257. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

258. Respondent admits that Easy Group has been involved in the sale in the United States of some of the accused toner supply containers. Respondent lacks information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph, and therefore denies those allegations.

259. Respondent admits that Easy Group has been involved in the sale in the United States of some of the accused toner supply containers. Respondent lacks information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph, and therefore denies those allegations.

2. Facilitating Circumvention Through Internet Operations

260. Respondent admits that Easy Group conducts activities via the Internet at least as cartridgeamerica.com, 499inks.com, 123refills.com, and atlanticinkjet.com. Respondent denies the remaining allegations in this paragraph as to Respondent. Respondent lacks information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph as to other parties, and therefore denies those allegations.

261. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

262. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

263. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

264. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

3. Use of Unmarked, Generic, and/or Reseller-Branded Packaging

265. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

4. Replication of Operations

266. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

B. Widespread Pattern of Importation and Sale, and Difficulty of Identifying the Sources, of Infringing Toner Supply Containers

1. Widespread Pattern of Importation and Sale

267. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

268. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

269. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

270. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

2. Difficulty of Identifying the Sources

271. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

272. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

273. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

274. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

275. Respondent lacks information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore denies those allegations.

XI. RELIEF REQUESTED

276. Respondent admits that Canon requests that the ITC institute an investigation, schedule and conduct a hearing, and make certain decisions and issue certain orders as set forth in this Paragraph. Respondent denies that it infringes any valid and enforceable claims of the Asserted Patents and denies that Canon is entitled to any relief as to the Respondent in this investigation. Respondent lacks information sufficient to form a belief as to the truth of the remaining allegations set forth in this Paragraph, and therefore denies those allegations.

RESPONSE TO NOTICE OF INVESTIGATION

Easy Group admits that the Commission has instituted an investigation as set forth in its Notice of Investigation. Easy Group denies that it has engaged in any unfair acts. To the extent that any further response is required with respect to statements in the Notice of Investigation, they are denied.

STATISTICAL INFORMATION PURSUANT TO COMMISSION RULE 210.13

Pursuant to Commission Rule 210.13, Easy Group provides the following information:

1. The supplier of the subject articles to Easy Group is [ ].

2. The number of units and value of Easy Group's sales of the accused products for 2019, 2020 and 2021 to date are approximately [ ], respectively.

3. Easy Group is not the importer and does not know the Harmonized Tariff Schedule Item No(s). for importation of the subject articles.

4. In general, the U.S. market is significant to Easy Group's operations, but sales of the subject articles are [ ].

RESPONDENT'S DEFENSES

Respondent asserts the following defenses to the allegations in the Complaint based on current information and belief. Respondent's inclusion of these defenses in this Response is not a concession that Respondent bears the burden of proof with respect to any of them. Discovery is only beginning as of the time of this Response, and therefore Respondent has not fully collected and reviewed all of the information that may be relevant to the matters and issues raised herein. Accordingly, pursuant to 19 C.F.R. §§ 210.14(b) and 210.14(c), Respondent reserves the right to seek amendment of, to modify, and/or expand these defenses, and to take further positions as discovery proceeds in this Investigation. Respondent denies that Complainants are entitled to any relief based on the assertions Complainants have made in the Complaint.

FIRST DEFENSE

(No Unfair Act/Unfair Competition)

1. On information and belief, Respondent has committed no unfair act or engaged in any unfair competition.

SECOND DEFENSE

(Non-Infringement)

2. On information and belief, Respondent has not directly infringed, indirectly infringed, contributed to infringement, or induced infringement of any valid and enforceable claim of any of the Asserted Patents, either literally or under the doctrine of equivalents, and has not otherwise committed any acts in violation of 35 U.S.C. § 271 or 19 U.S.C.§ 1337.

THIRD DEFENSE

(Invalidity)

3. On information and belief, the asserted claims of the Asserted Patents are invalid for failing to comply with the requirements of patentability set forth in the U.S. patent statutes, including but not limited to 35 U.S.C. §§ 102, 103, and/or 112. Relevant prior art includes the references listed on the face of the patents and the references cited or referred to in the prosecution history of the Asserted Patents. Respondent's investigation of the prior art and potential defenses in this investigation is continuing.

FOURTH DEFENSE

(First Sale Doctrine, Patent Exhaustion, Permissible Repair)

4. The importation and/or sale of remanufactured toner supply containers by Easy Group is lawful pursuant to the first sale doctrine and the doctrines of patent exhaustion and permissible repair.

FIFTH DEFENSE

(Incorporation)

5. Easy Group incorporates by reference any defenses asserted by any of the other Respondents in this proceeding and reserve any and all additional affirmative defenses available, now existing or later arising, as may be discovered during the course of this investigation.

PRAYER FOR RELIEF

WHEREFORE, the Respondent respectfully requests that the Commission:

(1) Deny all relief requested in the Complaint;

(2) Determine that the Respondent has not violated Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337;

(3) Determine that the Respondent has not committed any unfair act;

(4) Determine that the Respondent has not infringed the asserted claims of the Asserted Patents;

(5) Determine that the asserted claims of the Asserted Patents are invalid and unenforceable;

(6) Determine that there is no protectable domestic industry in the United States for the Asserted Patents;

(7) Determine that the exclusion order and other relief requested by the Complainants are not in the public interest;

(8) Dismiss the Complaint and terminate the investigation; and

(9) Grant the Respondent such further relief as the Commission deems just and proper.

Dated: May 17, 2021

Respectfully submitted,

/s/ Gary M. Hnath

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Counsel for Respondent Easy Group, LLC

VERIFICATION

I, Dimitris Constantinou, am the President for Easy Group, LLC and am authorized to submit this Verification on its behalf. I hereby declare under penalty of perjury that the foregoing Response of Easy Group, LLC to the Complaint of Canon Inc., Canon U.S.A., Inc., and Canon Virginia, Inc., and Notice of Investigation Under Section 337 is true and correct to the best of my knowledge, information and belief.

Executed on May 17, 2021

Dimitris Constantinou

CERTIFICATE OF SERVICE

I, Robert E. Rude, hereby certify that on this 17th day of May, 2021, copies of the foregoing document were filed and served on the following:

The Honorable Lisa R. Barton Secretary U.S. INTERNATIONAL TRADE COMMISSION 500 E. Street, SW, Room 112-A Washington, DC 20436	Via EDIS
The Honorable David P. Shaw Administrative Law Judge U.S. INTERNATIONAL TRADE COMMISSION 500 E. Street, SW, Room 317 Washington, DC 20436 Shaw337@usitc.gov	Via Email
Pyong Yoon Attorney Advisor U.S. INTERNATIONAL TRADE COMMISSION 500 E Street, SW Washington, DC 20436 Pyong.Yoon@usitc.gov	Via Email
Lisa Murray, Esq. Office of Unfair Import Investigations U.S. International Trade Commission 500 E Street SW Washington, DC 20436 Lisa.Murray@usitc.gov	Via Email
Counsel for Respondents Canon Inc., Canon U.S.A., Inc., and Canon Virginia, Inc.	
Michael P. Sandonato Dennis J. McMahon Andrew J. Kutas Sean M. McCarthy Nicholas D. Marcello VENABLE LLP 1270 Avenue of the Americas New York, NY 10020 Edward J. Haughey VENABLE LLP 600 Massachusetts Avenue, NW	Via Email

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Counsel for Respondents General Plastic Industrial Co. Ltd., Katun Corporation and Sun Data Supply, Inc.	
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Sichuan XingDian Technology Co., Ltd. 23B/24A, East Building, New Century Computer Mall Wuhou District Chengdu Sichuan, China 610041	Via International Mail
Sichuan Wiztoner Technology Co., Ltd. No.2666, 4th Section of Konggang Road, Southwest Airlines Economic Development Zone Chengdu Sichuan, China 610200	Via International Mail
Anhuiyatengshangmaoyouxiangongsi Xiaokoucun Haitouzhen Ganyuqu, China 222002	Via International Mail
ChengDuXiangChangNanShiYouSheBeiYouXianGongSi ShaWanLu63Hao1Dong2DanYuan5Lou1HaoFu7Hao JinNiuQu ChengDuShi SiChuanSheng, China 610000	Via International Mail
Copier Repair Specialists, Inc. P.O. Box. 127 Lewisville, Texas 75067-0127	Via First Class Mail
Digital Marketing Corporation d/b/a Digital Buyer Marketing Company 155 W. Washington Blvd. Suite 306 Los Angeles, California 90015	Via First Class Mail

Do It Wiser LLC d/b/a Image Toner 3422 Old Capitol Trail, #747 Wilmington, Delaware 19808	Via First Class Mail
Hefeierlandianzishangwuyouxiangongsi Xuefushequhuanchengdongluyiduan193 195ha Piduqutuanjiezhen Chengdushi, China 610000	Via International Mail
Ink Technologies Printer Supplies, LLC 7600 McEwen Road Dayton, Ohio 45459	Via First Class Mail
Kuhlmann Enterprises, Inc. d/b/a Precision Roller 2102 W. Quail Avenue, Suite 1 Phoenix, Arizona 85027	Via First Class Mail
NAR Cartridges 1011 Capuchino Ave. Burlingame, California 94010-3649	Via First Class Mail
Shenzhenshi Keluodeng Kejiyouxiangognsi Yangguanghuayuan 6dong601 Bujijiedao, Longgangqu Shenzhen, Guangdong, China 518112	Via International Mail
MITOCOLOR INC. 18351 Colima Road, Suite A #2810 Rowland Heights, California 91748	Via First Class Mail
Xianshi yanliangqu canqiubaihuodianshanghang Yanliangqu Xinhualujiedaobanbeizhushichang X-572 Xianshi Shanxisheng, China 710089	Via International Mail
Zhuhai Henyun Image Co., Ltd. No. 76, Nanping Technology Industrial Park Xiangzhou District Zhuhai, China 519000	Via International Mail
Zinyaw LLC d/b/a TonerPirate.com and Supply District 1321 Upland Drive #1359 Houston, Texas 77043	Via First Class Mail

/s/ Robert E. Rude
Robert E. Rude

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