

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ATELIER EUMORI,

Plaintiff,

v.

THE PARTNERSHIPS, AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE "A",

Defendants.

Civil Action No. 2:26-cv-899

JURY TRIAL DEMANDED

FILED UNDER SEAL

PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSION

Pursuant to Fed. R. Civ. P. 36, Plaintiff Atelier Eumori, hereby submits the following Requests for Admission to all Schedule A Defendants ("Defendant" and "Responding Party"). Plaintiff requests that Responding Party serve its answers, in writing and under oath, to the undersigned counsel for Plaintiff at 18 Campus Blvd. Ste. 100, Newtown Square, PA 19073 within 5 business days of service of these Requests for Admission.

For the purpose of these Requests for Admission only, Plaintiff has used the definitions set forth below.

As used in these Requests for Admission:

1. "Any" means one or more.
2. "You," "you," or "your" means the Defendants listed on Schedule A attached to the Complaint, together with its officers, members, agents, representatives, employees, contractors,

co-signors, joint venturers, accountants, or any other person or entity acting on behalf of Responding Party.

3. The singular form of a noun or pronoun shall be considered to include within its meaning the plural form of the noun or pronoun, and vice versa; and the past tense shall include the present tense where the clear meaning is not distorted. The term “or” shall mean “and” and vice-versa, as necessary to bring within the scope of the following request for admission all information or documents that would be excluded absent this definition.

4. “Infringing Products” means the products and similar products identified in Plaintiff’s Complaint, in any variation of color or style, sold with a floor or without a floor, sold under any brand, trade name, or model name or number, as well as any variations thereof that are substantially similar to the products so identified.

5. The “Patent-in-Suit” refers to Design Patent asserted in Plaintiff’s Complaint.

REQUESTS FOR ADMISSION

REQUEST NO. 1

Admit that You sell the Infringing Products on Amazon.com, Walmart.com, AliExpress.com, Temu.com, eBay.com, Alibaba.com and other internet platforms.

REQUEST NO. 2

Admit that you sell the Infringing Products in interstate commerce.

REQUEST NO. 3

Admit that You and Plaintiff sell the Infringing products in the same marketplaces, including Amazon.com, Walmart.com, AliExpress.com, Temu.com, eBay.com, Alibaba.com and other internet platforms.

REQUEST NO. 4

Admit that You and Plaintiff use the same channels to market the Infringing Products.

REQUEST NO. 5

Admit that You have used Instagram to market the Infringing Products.

REQUEST NO. 6

Admit that You have used Facebook to market the Infringing Products.

REQUEST NO. 7

Admit that You have used X (formerly known as “Twitter”) to market the Infringing Products.

REQUEST NO. 8

Admit that You have used LinkedIn to market the Infringing Products.

REQUEST NO. 9

Admit that You have used YouTube to market the Infringing Products.

REQUEST NO. 10

Admit that You have used Pinterest to market the Infringing Products.

REQUEST NO. 11

Admit that You have used Amazon to market the Infringing Products.

REQUEST NO. 12

Admit that the Infringing Products is not covered by any issued U.S. patent owned by You.

REQUEST NO. 13

Admit that You and Plaintiff are competitors.

REQUEST NO. 14

Admit that You offered a free trial of one or more of the Infringing Products to Your customers or potential customers in exchange for a product review.

REQUEST NO. 15

Admit that you sold the Infringing Products under accounts not identified in Schedule A attached to Plaintiff's Complaint.

REQUEST NO. 16

Admit that you used multiple accounts on Amazon.com, Walmart.com, AliExpress, Alibaba.com, Temu.com, eBay.com and other platform to sell the Infringing Products.

REQUEST NO. 17

Admit that you sold at least 1000 units or more of the Infringing Products.

REQUEST NO. 18

Admit that you and all other Defendants listed in Schedule A attached to Plaintiff's Complaint are controlled by a common entity.

REQUEST NO. 19

Admit that your revenue from the sale of the Infringing Products is at least \$50,000 USD or

more.

REQUEST NO. 20

Admit that your revenue from the sale of the Infringing Products is at the total revenue by all Defendants listed in Schedule A of Plaintiff's Complaint.

REQUEST NO. 21

Admit that your profits from the sale of the Infringing Products is at least \$20,000 USD or more.

REQUEST NO. 22

Admit that the restrained amount is less than your profits from the sale of the Accused Products.

REQUEST NO. 23

Admit that the Patent-in-Suit is valid.

REQUEST NO. 24

Admit that the Infringing Products infringe the Patent-in-Suit.

REQUEST NO. 25

Admit that the you willfully infringed the Patent-in-Suit.

DATED June 15, 2026

Respectfully submitted,

By: /s/ Xiyang Zhang
Xiyang Zhang
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2026, a copy of the foregoing served on Defendant pursuant to this Court's Sealed Temporary Restraining Order authorizing service by email.

/s/ Xiyan Zhang
Xiyan Zhang