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July 19, 2022

VIA FEDERAL EXPRESS AND FIRST CLASS MAIL

Mr. Brian Cao
Top Glory Trading Group Inc.
9500 Railroad Avenue
North Bergen, New Jersey 07047-1422

Re: Bruno Marc's Infringement of Cole Haan IP (TC Ref: 56503-220828)

Mr. Cao,

We represent Cole Haan LLC in intellectual property matters. Top Glory Trading Group Inc., and/or Miracle Miles Group Inc., as owner of the Bruno Marc brand and seller of Bruno Marc shoes, is infringing several Cole Haan patents, as explained in further detail below.

First, the manufacture, use, sale, offer for sale, or importation of the Bruno Marc Mesh Fabric Fashion Sneakers Casual Oxfords, the Bruno Marc Mesh Sneakers Oxfords, and any other shoes that bear such or similar knitted uppers, constitute infringement of Cole Haan patents directed to knit uppers. Specifically, these sneakers infringe, at least, Cole Haan's U.S. Patents 10,327,511, 10,443,163, 11,041,262, D809,264, and D809,263. Examples of these infringing shoes are shown as follows:

Bruno Marc Mesh Fabric Fashion Sneakers Casual Oxfords Lightweight Breathable Versatile Walking Shoes	Bruno Marc Men's Mesh Sneakers Oxfords Lightweight Shoes

With respect to the utility patents, the Bruno Marc Mesh Fabric Fashion Sneakers Casual Oxfords infringe: (a) every independent claim of the '511 patent, (b) every independent claim of the '163 patent; and (c) every independent claim of the '262 patent. The Bruno Marc Mesh Sneakers Oxfords infringe: (a) at least independent claim 17, 20, and 21 of the '511 patent; (b) every independent claim of the '163 patent; and (c) every independent claim of the '262 patent.

Second, the manufacture, use, sale, offer for sale, or importation of the Bruno Marc Men's Suede Chelsea Boots Casual Ankle Shoes, the Bruno Marc Men's Chukka Dress Boots Leather Oxford Ankle Boot, the Bruno Marc Men's Suede Chukka Boots Desert Lace Up Dress Ankle Boot, the manufacture, use, sale, offer for sale, or importation of the Bruno Marc Men's Dress Sneakers Casual Oxford Formal Shoes, the Bruno Marc Men's Oxford Dress Sneakers Casual Leather Dress Shoes, and the Bruno Marc Men's Cap Toe Combat Dress Casual Chukka Boots, along with the manufacture, use, sale, offer for sale, or importation of any other shoe bearing this sole, constitute infringement of at least Cole Haan's U.S. patents D747,859 D768,367, and Cole Haan's trade dress in Cole Haan's popular ZeroGrand sole. Examples of these Bruno Marc shoes are shown as follows:

Bruno Marc Men's Suede Chelsea Boots Casual Ankle Shoes	Bruno Marc Men's Chukka Dress Boots Leather Oxford Ankle Boot
Bruno Marc Men's Suede Chukka Boots Desert Lace Up Dress Ankle Boot	Bruno Marc Men's Dress Sneakers Casual Oxford Formal Shoes
Bruno Marc Men's Oxford Dress Sneakers Casual Leather Dress Shoes	Bruno Marc Men's Cap Toe Combat Dress Casual Chukka Boots

To resolve this matter amicably, Cole Haan insists that Top Glory Trading Group immediately: (1) cease making, using, selling, offering for sale, and importing into the United States all identified infringing shoes (and any other shoes that are encompassed by Cole Haan's patents); (2) recall any and all of the infringing shoes; (3) provide an accounting of all infringing shoes sold to date and any remaining inventory; and (4) propose how Top Glory Trading Group intends to make Cole Haan whole for these infringements.

Please let us know by August 2, 2022, whether Top Glory Trading Group intends to comply with the requirements identified in this letter. Cole Haan reserves its rights to seek all remedies available to Cole Haan.

Best regards,

Thompson Coburn LLP

By
Alan H. Norman
Partner