

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

PETPIVOT INC.,

Plaintiff,

v.

Case No.:

Shenzhen Yingqi Environmental Art Co., Ltd.
D/B/A FumoiShop and Zhi Yang

Defendant. /

COMPLAINT

Plaintiff PetPivot Inc. (“***Plaintiff***”), by and through its undersigned counsel, states as follows for its Complaint against Defendants Shenzhen Yingqi Environmental Art Co., Ltd. D/B/A FumoiShop (“***FumoiShop***”) and Zhi Yang (“***Yang***”) (collectively, “***Defendants***”):

I. INTRODUCTION

1. This is a patent infringement case regarding automated cat litter boxes brought by Plaintiff against several Chinese defendants.

2. Plaintiff is an innovator in the self-cleaning cat litter box industry.

3. Plaintiff offers self-cleaning litter box products through its website, PetPivot.com, including its AutoScooper line of products.

4. One such example from Plaintiff’s AutoScooper line of products is the AutoScooper 11 Cat Litter Box, shown at right.

5. Plaintiff’s AutoScooper products are designed to provide a hands-free, automatic litter-cleaning solution that reduces odor, minimizes daily maintenance, and improves overall litter box hygiene. These products



are designed to be easy to use, require minimal setup, and allow cat owners to maintain a cleaner home with less effort than traditional litter boxes.

6. To protect its significant investments in research and development, Plaintiff secured, *inter alia*, U.S. Patent No. 12,433,239 (the “**’239 Patent**”), entitled “Pet Toilet with a Detachable Fecal Collection Box to a Bottom of a Base.”

7. A true and correct copy of the ’239 Patent is attached hereto as **Exhibit A**.

8. The ’239 Patent covers, *inter alia*, automatic litter-cleaning pet products.

9. Defendant FumoiShop is a competitor of PetPivot in the field of self-cleaning litter boxes.

10. Defendant FumoiShop has made, used, offered for sale, sold, and/or imported an automatic self-cleaning cat litter box identified at least as “Fumoi Self Cleaning Litter Box, Automatic Litter Box Self Cleaning Large Capacity for Multiple Cats, App Control with Safety Sensors, Removable Washable Liner, 2 Pack Garbage Bags, Grey” (the “**Accused Product**”) on Amazon.com (“**Amazon**”) and sold under the product detail page associated with Amazon ASIN B0DNYXKWRV (the “**Accused Listing**”).

11. A true and correct printout of the Accused Listing is attached hereto as **Exhibit B**.

12. An example image of the Accused Product taken from the Infringing Listing is shown below:



13. As discussed in detail below, Defendants’ and their Accused Product infringes at

least Claim 3 of the '239 Patent.

II. THE PARTIES, JURISDICTION, AND VENUE

14. Plaintiff is a corporation organized and existing under the laws of the State of Oregon, with its principal place of business at 5441 S Macadam Ave, Ste 4138, Portland, Oregon 97239.

15. On information and belief, Defendant Shenzhen Yingqi Environmental Art Co., Ltd. D/B/A FumoiShop is a Chinese company with its principal place of business at Longhua District, Dalang Subdistrict, Longping Community, Huigang Zundi Building C1, Unit 403-01, Shenzhen, Guangdong, 518000, China.

16. On information and belief, Defendant Zhi Yang is a Chinese individual with a mailing address at Group 2, Gangxia, Tangjiao Village, Youshi Township, Shangyou County, Ganzhou, Jiangxi, China.

17. This action arises under the patent laws of the United States, 35 U.S.C. § 100 *et seq.*

18. This Court has subject matter jurisdiction over the claims pursuant to at least 28 U.S.C. §§ 1331 (federal question) and 1338(a) (patents).

19. This Court has personal jurisdiction over Defendants at least because Defendants have purposefully directed infringing activities toward this District, have offered for sale and sold the Accused Product into this District and throughout the United States.

20. Plaintiff sells thousands of cat litterbox units in Florida each year through Amazon; including sales in this District.

21. Moreover, on information and belief and as discussed more fully below, Defendant sell infringing units in Florida; including in this District.

22. Thus, venue is proper in this district under 28 U.S.C. § 1400(b) because Defendants have committed acts of infringement in this District.

23. To the extent Defendants are not resident in the United States (and, instead, are resident in China), venue is also proper in this District under 28 U.S.C. §§ 1391(c)(3).

24. Finally, on information and belief, Defendants are resident in China and may not be subject to jurisdiction in any state's courts or general jurisdiction and, thus, personal jurisdiction is proper under Fed. R. Civ. P. 4(k)(2).

III. FACTUAL ALLEGATIONS

25. As noted above, Defendant FumoiShop sells Accused Products through the Accused Listing.

26. An example image of the Accused Product is shown below:



27. Amazon's seller storefront page identifies Defendant FumoiShop as the "Shenzhen Yingqi Environmental Art Co., Ltd."

28. A true and correct printout of Defendant FumoiShop's Amazon's seller storefront page is attached hereto as **Exhibit C**.

29. On March 28, 2026, Plaintiff conducted a test-purchase of an Accused Product through the Accused Listing.

30. A true and correct copy of the purchase receipt showing that this Accused Product was sold by Defendant FumoiShop is attached hereto as **Exhibit D**.

31. As shown in **Exhibit D**, this Accused Product was shipped to an address in Tampa, Florida (*i.e.*, within this District).

32. Thus, on information and belief, Defendant is committing acts of infringement within this District.

33. The Accused Products are branded under the FUMOI brand.

34. On information and belief, FUMOI is a registered trademark of Defendant Yang.

35. More specifically, U.S. Reg. No. 6,419,636 for FUMOI covering, *inter alia*, “[a]utomatic litter boxes for pets” was issued on or about July 13, 2021 to the Angie Trading Co., Ltd. as shown by the U.S. trademark registration certificate attached hereto as **Exhibit E**.

36. This trademark registration was later assigned from the Angie Trading Co., Ltd. to Defendant Yang on or about November 25, 2024 as shown by the trademark assignment attached hereto as **Exhibit F** (which was recorded at the U.S. Patent and Trademark Office).

37. The Accused Product also appears to be sold through other channels, including Fumoi-branded web page (www.fumoi.shop) and third-party retailers.

38. As an example, the same graphics included in the Accused Listing are used in the www.fumoi.shop website.

39. A true and correct printout of the www.fumoi.shop website is attached hereto as **Exhibit G**.

40. The Accused Product infringes at least Claim 3 of the ’239 Patent.

41. PetPivot brings this suit to stop Defendants’ unlawful activities, which have caused, are causing, and unless enjoined will continue to cause PetPivot significant and irreparable harm.

42. The ’239 Patent was issued by the United States Patent and Trademark Office on October 7, 2025.

43. PetPivot is the owner by assignment of all right, title, and interest in and to the '239 Patent.

44. The '239 Patent describes and claims improved pet toilet structures that address problems in existing intelligent cat litter boxes, including fecal collection chambers that are integrated with the base and therefore inconvenient to clean.

45. The '239 Patent discloses a pet toilet in which a fecal collection box is detachably provided on a base so the fecal collection box can be independently detached and cleaned.

46. By way of illustrative, non-exhaustive example, the Accused Product infringes at least Claim 3 of the '239 Patent.

47. Claim 3 of the '239 Patent is an independent claim which reads as follows (reference numerals have been interlineated for ease of reference herein):

[3.0] A pet toilet comprising:

[3.1] a base and a fecal collection box detachably provided on the base, the base defines a through hole running through itself from top to bottom, and the fecal collection box defines a fecal collection chamber in communication with the through hole and configured to collect excrement

[3.2] wherein a bottom of the base is provided with insertion slots at two sides of the through hole, two sides of the fecal collection box protrude outward to form insertion flanges, the insertion flanges are inserted in the insertion slots when the fecal collection box is mounted on the base,

[3.3] wherein the base protrudes downward at two sides of the through hole to form limit protrusions, a cross-section of the insertion slot is C-shaped, the limit protrusions are located at a side of the insertion slot close to the through hole and are arranged separately from the insertion slot.

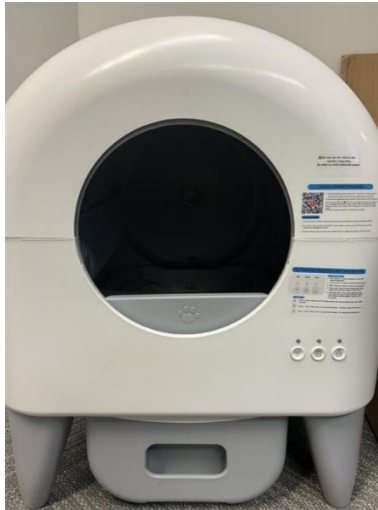
48. Each of these limitations is practiced by the Accused Product, as shown in detail in the claim chart attached hereto as **Exhibit H** and as outlined in the allegations below.

Limitation 3.0

49. To the extent that the preamble to Claim 3 is considered limiting, the Accused

Product practices limitation 3.0.

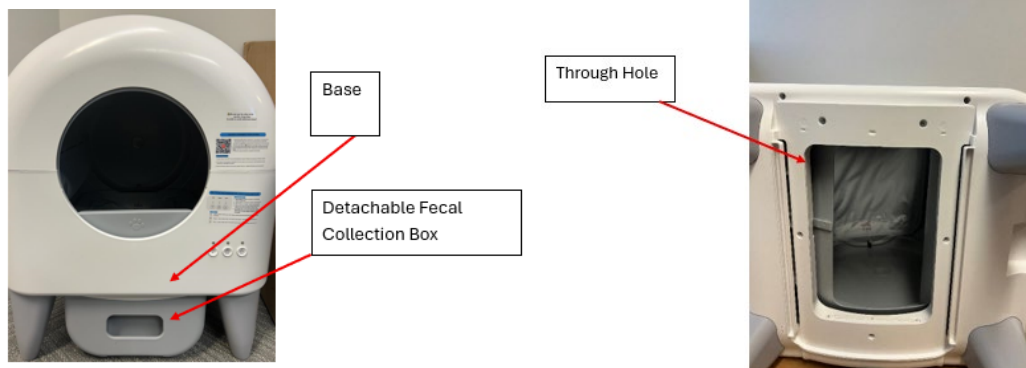
50. For example, the Accused Product (seen below) is a pet toilet (*i.e.*, a litter box):



Limitation 3.1

51. The Accused Product also practices limitation 3.1.

52. The Accused Product includes a base, a through hole running through the base from top to bottom, and a fecal collection box detachably provided on the base.



53. More specifically, the fecal collection box defines a fecal collection chamber in communication with the through hole and configured to collect excrement.



54. As shown above and in **Exhibit H**, the Accused Product's through hole extends downward into the detachable fecal collection box, allowing excrement to pass into the fecal collection chamber.

Limitation 3.2

55. The Accused Product also practices limitation 3.2.

56. As shown below, the Accused Product has a bottom that includes two elongated insertion slots located on opposite sides of the through hole.



57. As seen below, the Accused Product's fecal collection box includes outwardly protruding insertion flanges on two sides of the fecal collection box.

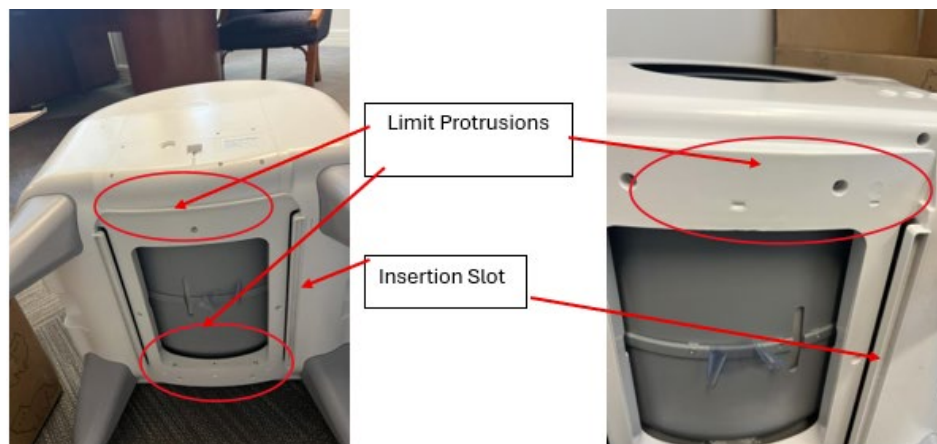


58. When the fecal collection box is mounted on the base, the insertion flanges are inserted into the insertion slots, allowing the fecal collection box to slide into and detach from the base.

Limitation 3.3

59. The Accused Product also practices limitation 3.3.

60. As seen below, the Accused Product's base includes downwardly protruding structures on opposite sides of the through hole that correspond to the claimed "limit protrusions."



61. These structures are either literally "limit protrusions" or are the equivalent of "limit protrusions."

62. The limit protrusions protrude downward from the base, are positioned at the side of the insertion-slot region closest to the through hole, and are arranged separately from the insertion slots rather than forming part of the insertion slots themselves.

63. The Accused Product's insertion slots further have a C-shaped cross-section as shown below.



64. Because the Accused Product practices every limitation of Claim 3 – either literally or under the doctrine of equivalents – the Accused Product infringes the '239 Patent.

COUNT I – DIRECT INFRINGEMENT OF THE '239 PATENT

65. PetPivot incorporates by reference the allegations set forth in paragraphs 1 through 64 of this Complaint as though fully set forth herein.

66. On information and belief, Defendants have been and are infringing the '239 Patent by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States, the Accused Product in violation of 35 U.S.C. § 271(a).

67. Defendants' infringement of the '239 Patent has caused – and will continue to cause – Plaintiff damages, for which Plaintiff is entitled to compensation under 35 U.S.C. § 284.

68. Defendants' infringement of the '239 Patent has caused – and will continue to cause

– Plaintiff immediate and irreparable harm unless such infringing activities are enjoined by this Court pursuant to 35 U.S.C. § 283.

69. Plaintiff has no adequate remedy at law.

70. This case is exceptional and, therefore, Plaintiff is entitled to an award of its reasonable attorney fees under 35 U.S.C. § 285.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court:

- (1) Adjudge that Defendants – individually and collectively – have directly infringed the '239 Patent, in violation of 35 U.S.C. § 271(a);
- (2) Grant an injunction preliminarily and permanently enjoining Defendants and their employees, agents, officers, directors, attorneys, successors, affiliates, subsidiaries, and assigns, and all of those in active concert and participation with any of the foregoing persons or entities from infringing the '239 Patent;
- (3) Order Defendants to account and pay damages adequate to compensate Plaintiff for Defendants' infringement of the '239 Patent (including, without limitation, for any infringing acts not presented at trial) and pre-judgment and post-judgment interest and costs, pursuant to 35 U.S.C. § 284;
- (4) Order an accounting for any infringing sales not presented at trial and an award by the Court of additional damages for any such infringing sales;
- (5) Order that the damages award be increased up to three times the actual amount assessed, pursuant to 35 U.S.C. § 284;
- (6) Declare this case exceptional and award Plaintiff its reasonable attorney fees, pursuant to 35 U.S.C. § 285; and

(7) Award such other and further relief as this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands trial by jury on all issues arising in this action so triable.

Dated: May 24, 2026

/s/ Luca L. Hickman, Esq.

DINSMORE & SHOHL LLP

Luca L. Hickman, Esq.
Florida Bar No. 118731
Mario E. Martinez, Esq.
Florida Bar No. 1033018

201 North Franklin Street, Suite 3050
Tampa, Florida 33602
Telephone: (813) 543-9835
luca.hickman@dinsmore.com
mario.martinez@dinsmore.com