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12 Attorneys for Plaintiffs  
13 INTEX RECREATION CORP. and  
INTEX MARKETING LTD.

14  
15  
16 UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
17 WESTERN DIVISION

18 INTEX RECREATION CORP. and  
19 INTEX MARKETING LTD.

20 Plaintiffs,

21 vs.

22 BESTWAY (USA), INC.,  
23 BESTWAY GLOBAL HOLDINGS  
INC., BESTWAY (HONG KONG)  
24 INTERNATIONAL, LTD.,  
25 BESTWAY INFLATABLES &  
MATERIALS CORPORATION,  
and BESTWAY (NANTONG)  
26 RECREATION CORP.,

27 Defendants.  
28

Case No.:

**COMPLAINT FOR  
PATENT INFRINGEMENT**

**DEMAND FOR JURY TRIAL**

1 Plaintiffs Intex Recreation Corp. (“IRC”) and Intex Marketing Ltd. (“IML”)  
2 (collectively, “Intex”), for their complaint against Defendants, Bestway (USA), Inc.  
3 (“Bestway-USA”), Bestway Global Holdings Inc. (“Bestway-Global”), Bestway  
4 (Hong Kong) International, Ltd. (“Bestway-Hong Kong”), Bestway Inflatables &  
5 Materials Corporation (“Bestway Inflatables”), and Bestway (Nantong) Recreation  
6 Corp. (“Bestway-Nantong”), (collectively, “Bestway” or “Defendants”), allege as  
7 follows:

8 **THE PARTIES**

9 1. IRC is a corporation organized and existing under the laws of the State  
10 of California.

11 2. IML is a corporation organized and existing under the laws of the British  
12 Virgin Islands.

13 3. Intex is in the business of selling many products, including inflatable  
14 airbeds and inflatable spas, among many others.

15 4. On information and belief, Bestway-USA is a corporation organized and  
16 existing under the laws of the State of Arizona, having a principal place of business at  
17 3249 East Harbour Drive, Phoenix, Arizona.

18 5. On information and belief, Bestway-Global is a corporation organized  
19 under the laws of the People’s Republic of China, having a principal place of  
20 business at No. 3065 Cao An Road, Shanghai, China, 201812. On further  
21 information and belief, Bestway-Global is registered to do business in California, and  
22 lists an agent for service of process at 20335 Howard Court, Woodland Hills,  
23 California.

24 6. On information and belief, Bestway-Hong Kong is a corporation  
25 organized under the laws of the Hong Kong Special Administrative Region of the  
26 People’s Republic of China, having a principal place of business at 66 Mody Road,  
27 Kowloon, Hong Kong.

28



1 subsidiaries, alter egos, and/or agents—has made, used, offered to sell, sold, and/or  
2 imported into the United States, including to customers located within the State of  
3 California and this District, the Accused Products. Bestway-Global—directly or  
4 through intermediaries (including distributors, retailers, and others), subsidiaries, alter  
5 egos, and/or agents—imports into the United States or offers to sell, sells, or uses  
6 within the United States the Accused Products, which are made by processes covered  
7 by the Asserted Patents. Bestway-Global has purposefully and voluntarily placed one  
8 or more of the Accused Products into the stream of commerce with the awareness  
9 and/or intent that they will be purchased by consumers in this District. Bestway-  
10 Global knowingly and purposefully ships the Accused Products into and within this  
11 District through an established distribution channel.

12 13. This Court has personal jurisdiction over Bestway-Hong Kong. On  
13 information and belief, Bestway-Hong Kong has conducted, and does regularly  
14 conduct, business within the State of California including this District. Bestway-  
15 Hong Kong—directly or through intermediaries (including distributors, retailers, and  
16 others), subsidiaries, alter egos, and/or agents—has made, used, offered to sell, sold,  
17 and/or imported into the United States, including to customers located within the  
18 State of California and this District, the Accused Products. Bestway-Hong Kong—  
19 directly or through intermediaries (including distributors, retailers, and others),  
20 subsidiaries, alter egos, and/or agents—imports into the United States or offers to  
21 sell, sells, or uses within the United States the Accused Products, which are made by  
22 processes covered by the Asserted Patents. Bestway-Hong Kong has purposefully  
23 and voluntarily placed one or more of the Accused Products into the stream of  
24 commerce with the awareness and/or intent that they will be purchased by consumers  
25 in this District. Bestway-Hong Kong knowingly and purposefully ships the Accused  
26 Products into and within this District through an established distribution channel.

27 14. This Court has personal jurisdiction over Bestway Inflatables. On  
28 information and belief, Bestway Inflatables has conducted, and does regularly

1 conduct, business within the State of California including this District. Bestway  
2 Inflatables—directly or through intermediaries (including distributors, retailers, and  
3 others), subsidiaries, alter egos, and/or agents—has made, used, offered to sell, sold,  
4 and/or imported into the United States, including to customers located within the  
5 State of California and this District, the Accused Products. Bestway Inflatables—  
6 directly or through intermediaries (including distributors, retailers, and others),  
7 subsidiaries, alter egos, and/or agents—imports into the United States or offers to  
8 sell, sells, or uses within the United States the Accused Products, which are made by  
9 processes covered by the Asserted Patents. Bestway Inflatables has purposefully and  
10 voluntarily placed one or more of the Accused Products into the stream of commerce  
11 with the awareness and/or intent that they will be purchased by consumers in this  
12 District. Bestway Inflatables knowingly and purposefully ships the Accused Products  
13 into and within this District through an established distribution channel.

14 15. This Court has personal jurisdiction over Bestway-Nantong. On  
15 information and belief, Bestway-Nantong has conducted, and does regularly conduct,  
16 business within the State of California including this District. Bestway-Nantong—  
17 directly or through intermediaries (including distributors, retailers, and others),  
18 subsidiaries, alter egos, and/or agents—has made, used, offered to sell, sold, and/or  
19 imported into the United States, including to customers located within the State of  
20 California and this District, the Accused Products. Bestway-Nantong—directly or  
21 through intermediaries (including distributors, retailers, and others), subsidiaries, alter  
22 egos, and/or agents—imports into the United States or offers to sell, sells, or uses  
23 within the United States the Accused Products, which are made by processes covered  
24 by the Asserted Patents. Bestway-Nantong has purposefully and voluntarily placed  
25 one or more of the Accused Products into the stream of commerce with the awareness  
26 and/or intent that they will be purchased by consumers in this District. Bestway-  
27 Nantong knowingly and purposefully ships the Accused Products into and within this  
28 District through an established distribution channel.

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