

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

REA.DEEMING BEAUTY, INC.,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS, AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE A TO THE
COMPLAINT,

Defendants.

Case No. 26-cv-03235

COMPLAINT

Jury Trial Demanded

Plaintiff REA.DEEMING BEAUTY, INC. (“Plaintiff” or “REA.DEEMING BEAUTY”) hereby alleges as follows against the individuals, corporations, limited liability companies, partnerships, unincorporated associations and foreign entities identified on Schedule A¹ to this Complaint (collectively, “Defendants”):

INTRODUCTION

1. This action has been filed by Plaintiff to combat online counterfeiters who trade on Plaintiff’s reputation and goodwill by selling and/or offering for sale products in connection with Plaintiff’s trademarks, which are covered by U.S. Trademark Registration Nos. 2945105, 3190049, 4570128, 4614408, 4719164, 4719170, 4719175, 4908115, 4908116, 5628998, 5629037, 5657490, 5668153, 5686296, 5700378, 5765814, 5956096, 5956097, 6263629, 6263630, 6836059, 6846824, 6880957, and 7800976 (the “REA.DEEMING BEAUTY Trademarks”).

¹ Plaintiff is filing a motion to temporarily seal Schedule A simultaneously with the filing of this Complaint

2. The REA.DEEMING BEAUTY Trademarks are valid, subsisting, and in full force and effect. True and correct copies of the federal trademark registration certificates for the REA.DEEMING BEAUTY Trademarks, as well as any assignment agreements, are attached hereto as **Exhibit 1**.

3. This is also an action for patent infringement to combat e-commerce store operators who trade upon Plaintiff's reputation and goodwill by making, using, offering for sale, selling and/or importing into the United States for subsequent sale or use, unauthorized and unlicensed products that infringe Plaintiff's design patents covered by U.S. Patent Nos. US D785238 S, US D788977 S, US D800961 S, US D800966 S, US D846997 S, US D850005 S, US D852058 S, US D861245 S, US D866864 S, US D878674 S, US D882169 S, US D895202 S, US D921988 S, and US D1042968 S (the "REA.DEEMING BEAUTY Patents", together with the REA.DEEMING BEAUTY Trademarks, the "REA.DEEMING BEAUTY IP"). The REA.DEEMING BEAUTY Patents are valid, subsisting, and in full force and effect. Plaintiff is the owner and lawful assignee of all right, title, and interest in and to the REA.DEEMING BEAUTY Patents, which were duly and legally issued by the United States Patent and Trademark Office. True and correct copies of the REA.DEEMING BEAUTY Patents are attached as **Exhibit 2**.

4. Defendants are improperly advertising, marketing and/or selling unauthorized and noncompliant products by reference to marks identical or substantially similar to Plaintiff's REA.DEEMING BEAUTY Trademarks, and/or which embody the design(s) depicted in the REA.DEEMING BEAUTY Patents (the "Counterfeit Products"). By selling Counterfeit Products that purport to be genuine and authorized products using the REA.DEEMING BEAUTY IP (the "REA.DEEMING BEAUTY Products"), Defendants cause confusion and deception in the marketplace.

5. Defendants create numerous fully interactive commercial internet stores operating under the online marketplace accounts identified in Schedule A (collectively, the “Defendant Internet Stores”), including on the platforms Amazon, DHGate, eBay, Shein, Temu, and Walmart (collectively, the “Marketplace Platforms”).

6. Defendants design their online marketplace accounts to appear to be selling genuine products bearing, using, and/or embodying the REA.DEEMING BEAUTY IP while selling inferior imitations of such products.

7. The Defendant Internet Stores share unique identifiers, such as design elements and similarities of the counterfeit products offered for sale, establishing a logical relationship between them and suggesting that Defendants’ illegal operations arise out of the same transaction, occurrence, or series of transactions or occurrences.

8. Defendants attempt to avoid liability by going to great lengths to conceal both their identities and the full scope and interworking of their illegal counterfeiting operation. Plaintiff is forced to file this action to combat Defendants’ counterfeiting and/or infringing of the REA.DEEMING BEAUTY IP, as well as to protect consumers from unknowingly purchasing Counterfeit Products.

9. As a result of Defendants’ actions, Plaintiff has been and continues to be irreparably damaged through consumer confusion, dilution, and tarnishment of its valuable trademarks and goodwill. Plaintiff is further irreparably damaged from the loss of its lawful rights to exclude others from making, using, selling, offering for sale, and importing its patents. Plaintiff therefore seeks injunctive and monetary relief.

10. This Court has personal jurisdiction over each Defendant, in that each Defendant conducts significant business in New York and in this Judicial District, and the acts and events

giving rise to this lawsuit of which each Defendant stands accused were undertaken in New York and in this Judicial District.

11. In addition, each Defendant has offered to sell and ship infringing products into this Judicial District.

SUBJECT MATTER JURISDICTION

12. This Court has original subject matter jurisdiction over the trademark infringement and false designation of origin claims in this action pursuant to the provisions of the Lanham Act, 15 U.S.C. § 1051 *et seq.*, and 28 U.S.C. §§ 1331, 1338(a)–(b). This Court has original subject matter jurisdiction over the patent infringement claims arising under the patent laws of the United States pursuant to 35 U.S.C. § 1 *et seq.*, 28 U.S.C. § 1338(a), and 28 U.S.C. § 1331.

13. This Court has jurisdiction over the unfair deceptive trade practices claims in this action that arise under the laws of the State of New York pursuant to 28 U.S.C. § 1367(a), because the state law claims are so related to the federal claims that they form part of the same case or controversy and derive from a common nucleus of operative facts.

PERSONAL JURISDICTION AND VENUE

14. Personal jurisdiction exists over Defendants in this Judicial District pursuant to C.P.L.R. § 302(a)(1) and (3), or in the alternative, Fed. R. Civ. P. 4(k) because, upon information and belief, Defendants regularly conduct, transact, and/or solicit business in New York and in this Judicial District; derive substantial revenue from business transactions in New York and in this Judicial District; and/or otherwise avail themselves of the privileges and protections of the laws of the State of New York such that this Court's assertion of jurisdiction over Defendants does not offend traditional notions of fair play and due process.

15. In addition, because Plaintiff sells genuine merchandise bearing, using, and/or embodying the REA.DEEMING BEAUTY IP in this Judicial District, Defendants' illegal counterfeiting and infringing actions have injured Plaintiff in this Judicial District through lost sales and customers. Defendants' actions have also harmed Plaintiff by confusing and deceiving consumers in this Judicial District who can view Defendant Internet Stores such that Defendants should reasonably expect such actions to have consequences in New York and this Judicial District.

16. For example, Defendant Internet Stores accept orders for Counterfeit Products from and offer shipping to New York addresses located in this Judicial District. Exemplar screenshots of the shopping cart from Defendant Internet Stores allowing Counterfeit Products to be shipped to this Judicial District are attached as Exhibit 3 to the Declaration of Eric Haydt.

17. Upon information and belief, Defendants also were and/or are systematically directing and/or targeting their business activities at consumers in the United States, including those in New York and in this Judicial District, through accounts (the "User Account(s)") on e-commerce sites including the Marketplace Platforms, as well as any and all as yet undiscovered User Accounts with additional online marketplace platforms held by or associated with Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them. Through these User Accounts, consumers in the United States, including New York and this Judicial District, can view the marketplace accounts that each Defendant operates, uses to communicate with Defendants regarding their listings for Counterfeit Products, and to place orders for, receive invoices for and purchase Counterfeit Products for delivery in the U.S., including New York and this Judicial District, as a means for establishing regular business with the United States, including New York and this Judicial District.




18. Defendants have transacted business with consumers located in the United States, including New York and this Judicial District, for the sale and shipment of Counterfeit Products.




19. Venue is proper in this Court pursuant to at least 28 U.S.C. §§ 1391(b)(2) and 1400(a) because Defendants have committed acts of trademark and/or patent infringement in this Judicial District and do substantial business in this Judicial District.

THE PLAINTIFF

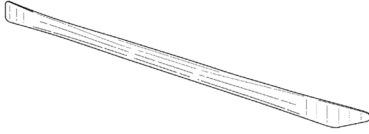
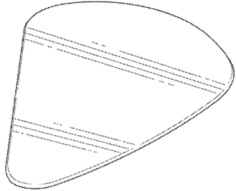
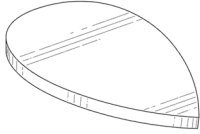
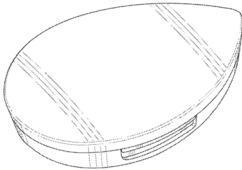
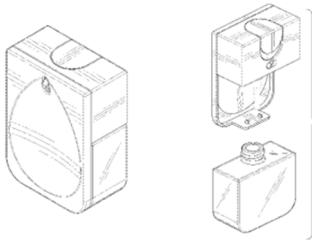
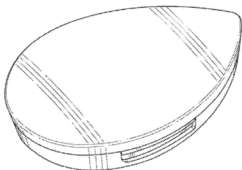
20. Plaintiff REA.DEEMING BEAUTY is a corporation organized and existing under the laws of California with its principal place of business in Pennsylvania.

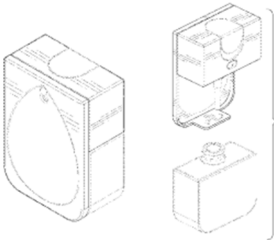



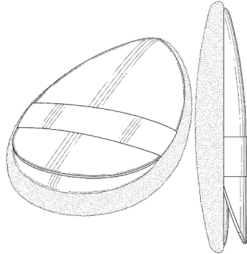
21. Plaintiff is the registered owner of the REA.DEEMING BEAUTY Trademarks (attached as **Exhibit 1**), as follows:




U.S. TM Reg. No.	Trademark	Registration Date
2,945,105	BEAUTYBLENDER	April 26, 2005
3,190,049	BLENDERCLEANSER	December 26, 2006
4,570,128	solid	July 15, 2014
4,614,408	sur.face	September 30, 2014
4,719,164	beautyblender	April 14, 2015
4,719,170		April 14, 2015
4,719,175		April 14, 2015
4,908,115	MAKEUP'S BEST FRIEND	March 1, 2016
4,908,116	BODYBLENDER	March 1, 2016
5,628,998	BOUNCE	December 11, 2018
5,629,037		December 11, 2018

U.S. TM Reg. No.	Trademark	Registration Date
5,657,490	INSTACLEAN	January 15, 2019
5,668,153	BEAUTYBLUSHER	February 5, 2019
5,686,296	BLENDER DEFENDER	February 26, 2019
5,700,378	KEEP.IT.CLEAN	March 19, 2019
5,765,814	GLASS GLOW	May 28, 2019
5,956,096	BEAUTYBLENDER	January 7, 2020
5,956,097	BEAUTY BLENDER	January 7, 2020
6,263,629		February 9, 2021
6,263,630		February 9, 2021
6,836,059		September 6, 2022
6,846,824	POWER PUFF	September 13, 2022
6,880,957	BIOPLUSH	October 18, 2022
7,800,976	BLOTTERAZZI	May 20, 2025

22. Plaintiff is also the registered owner of the REA.DEEMING BEAUTY Patents (attached as **Exhibit 2**), as follows:

U.S. Patent Number	Claim	Issue Date
US D785238 S		April 25, 2017
US D788977 S		June 6, 2017
US D800961 S		October 24, 2017
US D800966 S		October 24, 2017
US D846997 S		April 30, 2019
US D850005 S		May 28, 2019

U.S. Patent Number	Claim	Issue Date
US D852058 S		June 25, 2019
US D861245 S		September 24, 2019
US D866864 S		November 12, 2019
US D878674 S		March 17, 2020
US D882169 S		April 21, 2020

U.S. Patent Number	Claim	Issue Date
US D895202 S		September 1, 2020
US D921988 S		June 8, 2021
US D1042968 S		September 17, 2024

THE DEFENDANTS

23. Defendants are individuals and business entities who, upon information and belief, reside mainly in the People’s Republic of China or other foreign jurisdictions.

24. Defendants are merchants on online e-commerce platforms, including the Marketplace Platforms.

THE REA.DEEMING BEAUTY PRODUCTS

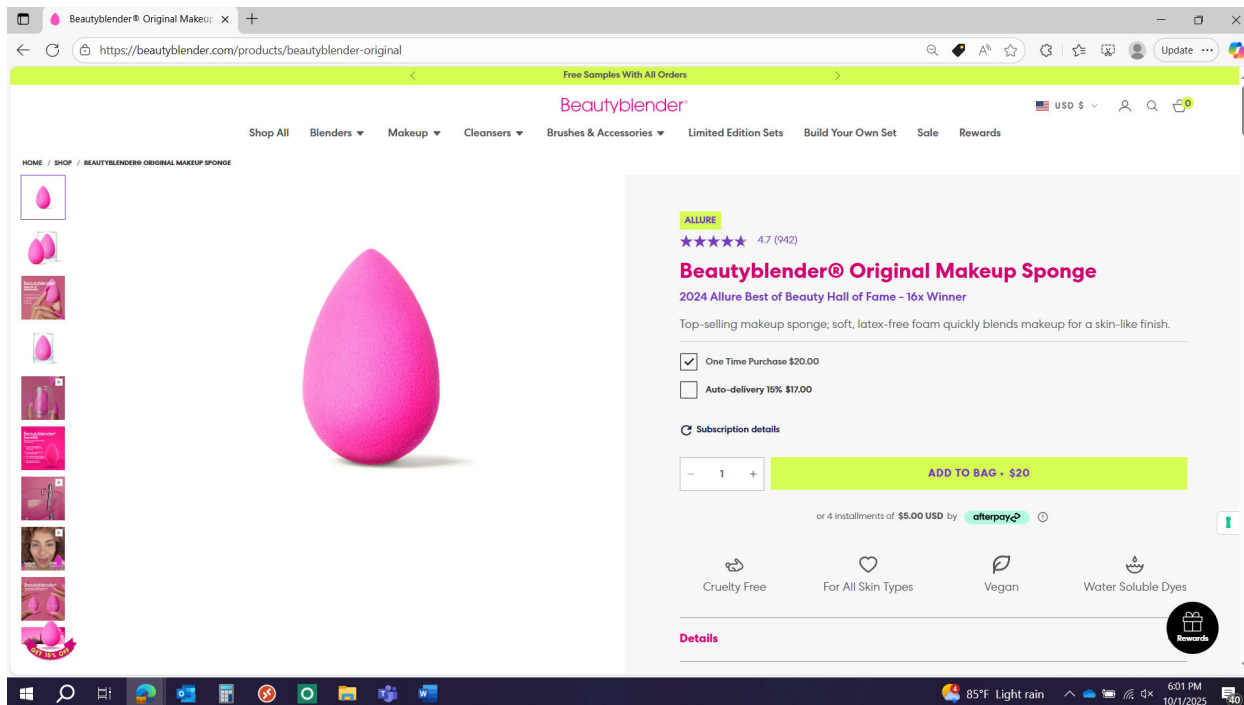
25. Plaintiff is a leading supplier and manufacturer of cosmetics and makeup products, such as the Beauty Blender which has earned an international reputation for quality, reliability and value. Plaintiff is credited for many breakthroughs that have occurred in the industry, including its REA.DEEMING BEAUTY Products.

26. Plaintiff is the official source of REA.DEEMING BEAUTY Products in the United States, which include, among others, the Beauty Blender makeup sponge, the Power Pocket Puff, a powder puff sponge, and the Blender Defender, a makeup sponge carrying case.

27. Since at least 2004, Plaintiff has developed and marketed high-quality cosmetics products and makeup accessories incorporating the REA.DEEMING BEAUTY IP. The REA.DEEMING BEAUTY Trademarks are and have been the subject of substantial and continuous marketing and promotion by Plaintiff in the industry and to consumers.

28. The REA.DEEMING BEAUTY Trademarks are distinctive and identify the merchandise as goods from Plaintiff. The registrations for the REA.DEEMING BEAUTY Trademarks constitute *prima facie* evidence of their validity and of Plaintiff's exclusive right to use the trademarks pursuant to 15 U.S.C. § 1057(b).

29. From the date of the creation of the first REA.DEEMING BEAUTY Products to the present, Plaintiff and its authorized retailers are and have been the sole and official source of genuine REA.DEEMING BEAUTY Products in the United States.



Exemplar of Genuine REA.DEEMING BEAUTY Products Incorporating the REA.DEEMING BEAUTY IP

30. Each of the REA.DEEMING BEAUTY Trademarks qualifies as a famous mark, as that term is used in 15 U.S.C. §1125(c)(1), and each has been continuously used and never abandoned. Since Plaintiff launched its REA.DEEMING BEAUTY Products, Plaintiff has followed a defined strategy for positioning its brand, marketing, and promoting the product line in the industry and to consumers, and establishing distribution channels. Plaintiff's promotional efforts for the REA.DEEMING BEAUTY Products include the Beauty Blender website (<https://beautyblender.com>), and substantial marketing and advertising on the internet, television, radio and trade shows. Plaintiff has expended substantial time, money, and other resources in advertising and otherwise promoting the REA.DEEMING BEAUTY Products.

31. The REA.DEEMING BEAUTY Products have become enormously popular, driven by Plaintiff's arduous quality standards and innovative trademarked designs. These designs are broadly recognized by consumers as being sourced from Plaintiff. Products fashioned after

these designs are associated with the quality and innovation that the public has come to expect from Plaintiff and its REA.DEEMING BEAUTY Products.

32. Plaintiff owns all rights, including without limitation, the rights to reproduce the trademarked designs in copies, to prepare derivative works based upon the trademarked designs, and to distribute copies of the trademarked designs to the public by sale or other transfer of ownership, or by rental, lease, or lending, in the REA.DEEMING BEAUTY Trademarks as the owner of those trademarks.

33. Plaintiff is also the owner and lawful assignee of all right, title, and interest in and to the REA.DEEMING BEAUTY Patents.

34. The REA.DEEMING BEAUTY Products in many instances embody at least a portion of the design(s) depicted in the REA.DEEMING BEAUTY Patents.

THE DEFENDANTS' UNLAWFUL CONDUCT

35. The success of the REA.DEEMING BEAUTY Products has resulted in significant counterfeiting. Plaintiff has identified numerous Defendant Internet Stores linked to fully interactive websites on e-commerce sites including the Marketplace Platforms. These Defendant Internet Stores offer for sale, sell, and import Counterfeit Products to consumers in this Judicial District and throughout the United States.

36. Defendants have persisted in creating such online marketplaces and internet stores that contribute to the hundreds of billions of dollars of counterfeit goods sold each year. According to an intellectual property rights seizures statistics report issued by U.S. Customs and Border Protection, the manufacturer's suggested retail price of goods seized by the U.S. government in fiscal year 2024 was approximately \$5.4 billion, and over \$5 billion of seized goods came from

China and Hong Kong alone. *See* Declaration of Christopher Tom (“Tom Decl.”), filed simultaneously with the filing of this Complaint, Ex. 2.

37. Defendants facilitate sales by designing the Defendants’ Internet Stores so that they appear to unknowing consumers to be authorized online retailers, outlet stores, or wholesalers selling genuine REA.DEEMING BEAUTY Products. Many of the Defendant Internet Stores look sophisticated and accept payment in U.S. dollars via credit cards, Western Union, and PayPal. Defendant Internet Stores often include images and design elements that make it very difficult for consumers to distinguish such counterfeit sites from an authorized website.

38. Plaintiff has not licensed or authorized Defendants to use the REA.DEEMING BEAUTY IP. None of the Defendants are authorized retailers of the genuine REA.DEEMING BEAUTY Products.

39. Defendants also deceive unknowing consumers by using without authorization the REA.DEEMING BEAUTY Trademarks within the product descriptions, content, text, and/or meta tags of their websites to attract various search engines crawling the Internet looking for websites relevant to consumer searches for REA.DEEMING BEAUTY Products. Additionally, upon information and belief, Defendants use other unauthorized search engine optimization (“SEO”) tactics and social media spamming so that the Defendant Internet Stores listings show up at or near the top of relevant search results and misdirect consumers searching for genuine REA.DEEMING BEAUTY Products. Further, Defendants utilize similar illegitimate SEO tactics to propel new domain names to the top of search results after others are shut down.

40. On information and belief, Defendants go to great lengths to conceal their identities and often use multiple fictitious names and addresses to register and operate their massive network of Defendant Internet Stores. For example, it is common practice for counterfeiters to register their

domain names and/or User Accounts with incomplete information, randomly typed letters, or omitted cities or states.

41. Defendants regularly create new websites and online marketplace accounts on various platforms using the identities listed in Schedule A to the Complaint, as well as other unknown fictitious names and addresses. Such Defendant Internet Store registration patterns are one of many common tactics used by the Defendants to conceal their identities, the full scope and interworking of their massive counterfeiting operation, and to avoid being shut down.

42. Even though Defendants operate under multiple fictitious names, there are numerous similarities among the Defendant Internet Stores. For example, the Counterfeit Products for sale in the Defendant Internet Stores bear similarities and indicia of being related to one another, suggesting that the Counterfeit Products were manufactured by and come from a common source and that, upon information and belief, Defendants are interrelated.

43. In addition, Defendants in this case and defendants in other similar cases against online counterfeiters use a variety of other common tactics to evade enforcement efforts. For example, counterfeiters like Defendants will often register new online marketplace accounts under User Accounts once they receive notice of a lawsuit.²

² *Buyers Beware! ICE HIS and CBP in Boston warn consumers about counterfeit goods during holiday shopping season*, U.S. Immigration and Customs Enforcement (Dec. 11, 2019) <https://www.ice.gov/news/releases/buyers-beware-ice-hsi-and-cbp-boston-warn-consumers-about-counterfeit-goods-during> (noting counterfeiters are adept at “setting up online stores to lure the public into thinking they are purchasing legitimate good on legitimate websites”) (last visited Apr. 16, 2026)

44. Counterfeiters also often move website hosting to rogue servers located outside the United States once notice of a lawsuit is received.³ Rogue servers are notorious for ignoring take down demands sent by brand owners.

45. Counterfeiters also typically ship products in small quantities via international mail to minimize detection by U.S. Customs and Border Protection. According to the previously cited 2024 U.S. Customs and Border Protection report on seizure statistics, in fiscal year 2024, “97% of [Intellectual Property Rights] seizures in the cargo environment occurred in the de minimis shipments.” *See* Tom Decl. Ex. 2. Further, counterfeiters such as Defendants typically operate multiple credit card merchant accounts and PayPal accounts behind layers of payment gateways so that they can continue operation in spite of Plaintiff’s enforcement efforts.

46. On information and belief, Defendants maintain offshore bank accounts and regularly move funds from their PayPal accounts to offshore bank accounts outside the jurisdiction of this Court. Analysis of PayPal transaction logs from previous similar cases indicates that offshore counterfeiters regularly move funds from U.S.-based PayPal accounts to foreign-based bank accounts outside the jurisdiction of this Court.

47. Defendants, without any authorization or license from Plaintiff, have knowingly and willfully used and continue to use the REA.DEEMING BEAUTY IP in connection with the advertisement, distribution, offering for sale, sale and import of Counterfeit Products into the United States and New York over the Internet.

³ Rogue internet servers and sellers are a well-known tactic that have even been covered in Cabinet-level agency reports. *See* 2023 Review of Notorious Markets for Counterfeiting and Piracy (available online at https://ustr.gov/sites/default/files/2023_Review_of_Notorious_Markets_for_Counterfeiting_and_Piracy_Notorious_Markets_List_final.pdf) (last visited Apr. 16, 2026).

48. Each Defendant Internet Store offers shipping to the United States, including New York in this Judicial District, and each Defendant has offered to sell counterfeit REA.DEEMING BEAUTY Products into the United States, including New York in this Judicial District.

49. Defendants' use of the REA.DEEMING BEAUTY IP in connection with the advertising, distribution, offering for sale, and sale of Counterfeit Products is likely to cause and has caused confusion, mistake, and deception by and among consumers and is irreparably harming Plaintiff.

50. Prior to and contemporaneous with their counterfeiting and infringing actions alleged herein, Defendants had knowledge of Plaintiff's ownership of the REA.DEEMING BEAUTY IP, of the fame and incalculable goodwill associated therewith and of the popularity and success of the REA.DEEMING BEAUTY Products, and in bad faith proceeded to manufacture, market, develop, offer to be sold, and/or sell the Counterfeit Products.

51. Defendants have been engaging in the illegal counterfeiting and infringing actions, as alleged herein, knowingly and intentionally, or with reckless disregard or willful blindness to Plaintiff's rights, or in bad faith, for the purpose of trading on the goodwill and reputation of Plaintiff and the REA.DEEMING BEAUTY Products.

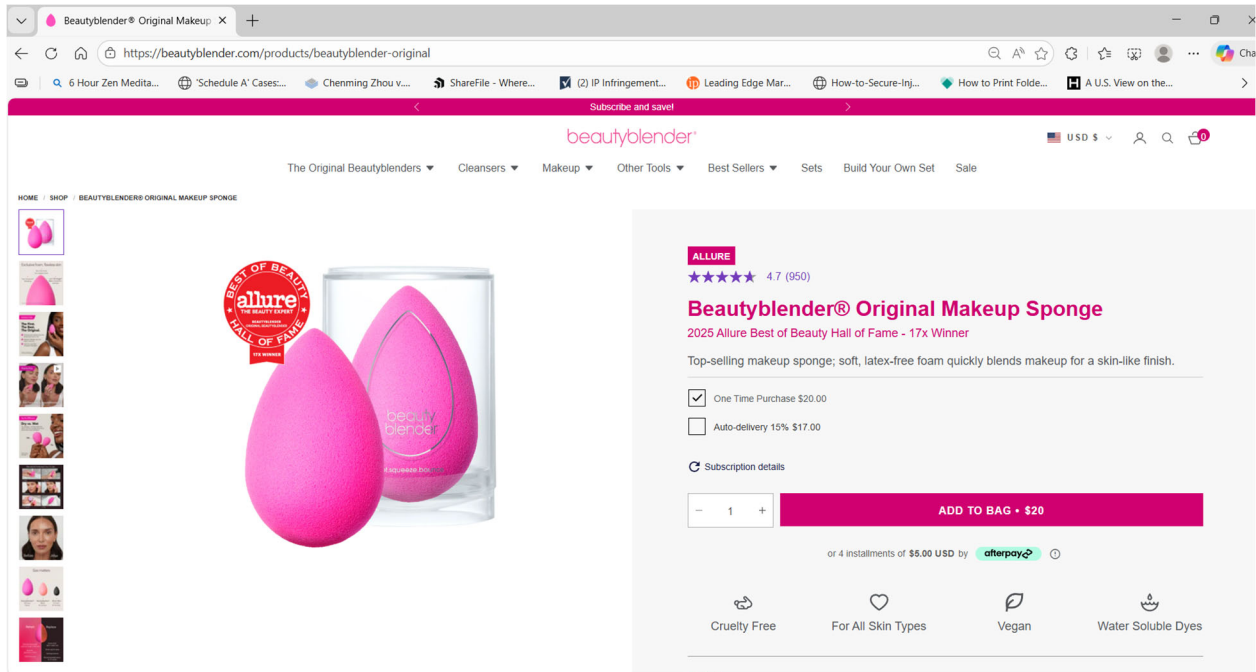
FIRST CAUSE OF ACTION
TRADEMARK INFRINGEMENT AND COUNTERFEITING (15 U.S.C. § 1114 *et seq.*)
[Against Defendants Designated in Schedule A to the Complaint]

52. Plaintiff repeats and incorporates by reference herein its allegations contained in paragraphs 1–51 of this Complaint.

53. This is a trademark infringement action against Defendants based on their unauthorized use in commerce of counterfeit imitations of the registered REA.DEEMING BEAUTY Trademarks in connection with the sale, offering for sale, distribution, and/or advertising of infringing goods. The REA.DEEMING BEAUTY Trademarks are highly distinctive

marks. Consumers have come to expect the highest quality from Plaintiff’s products provided under the REA.DEEMING BEAUTY Trademarks.

54. Defendants have sold, offered to sell, marketed, distributed, and advertised, and are still selling, offering to sell, marketing, distributing, and advertising products in connection with the REA.DEEMING BEAUTY Trademarks without Plaintiff’s permission.



Exemplar of Genuine Product and Image incorporating Plaintiff’s REA.DEEMING BEAUTY Trademarks

COMPARED TO

Professional Beauty Blender Makeup Sponges Set - 8 Pack Premium Foundation Blending Sponges, Latex-Free Hypoallergenic Cosmetic Beauty Sponges for Flawless Liquid Powder Cream Application

4.5 stars (208) | Search this page

\$4.99 (\$4.99 / count)

Think you for being an Amazon customer. Get \$5.00 off: Pay **\$0.00 \$4.00** upon approval for Amazon Visa.

FREE Returns

Top highlights

Brand [Redacted]
Color RED AND BLACK
Material Latex-free foam
Recommended Uses For Use for dry and wet makeup
Product
Specific Uses For Dry powder & and liquid cream
Product

About this item

- **PROFESSIONAL 8-PACK SET** - Premium beauty blender makeup sponges for flawless foundation, powder, and cream application with salon-quality results
- **LATEX FREE & HYPOALLERGENIC** - Safe for sensitive skin with non-toxic materials that won't cause irritation or allergic reactions during daily use
- **VERSATILE BLENDING TECHNOLOGY** - Multi-use cosmetic sponges work wet or dry for seamless blending of liquid foundation, concealer, powder, and cream products
- **DURABLE & REUSABLE DESIGN** - Long-lasting professional makeup tools that maintain shape and texture through multiple washes for extended use
- **COMPLETE BEAUTY KIT** - 8 premium foundation blending sponges provide everything needed for professional makeup application at home or on-the-go

Ask Rufus

Can it be used with cream products? Is this blender hypoallergenic?
 Does it come with a storage case? Why you might like this
 Compare with similar Ask something else

Prime
 Enjoy fast, free delivery, exclusive deals, and award-winning movies & TV shows.
 Join Prime

One-time purchase
\$4.99 (\$4.99 / count)

FREE delivery Wednesday, March 18 on orders shipped by Amazon over \$35
 Or fastest delivery **Sunday, March 15**. Order within 4 hrs, 49 mins
 Deliver to John - New York 10013

Only 2 left in stock - order soon.

Quantity: 1

Add to cart
Buy Now

Ships from Amazon
 Sold by [Redacted]
 Returns: **FREE 30-day return/replacement**
 Payment: **Secure transaction**
 See less

Subscribe & Save
\$4.74 (\$4.74 / count)

6 Pcs Powder Puff Face Soft Triangle Makeup Puff Velour Makeup Sponge Beauty Blender for Loose Powder

0 ratings yet

Actual Color: Black and Pink

Beige \$16.99	Black \$16.99	Black and Olive \$16.99	Black and Deep Purple \$16.99	Black and Flesh \$16.99
Black and Gray \$16.99	Black and Green \$16.99	Black and Peacock Blue \$16.99	Black and Pink \$16.99	
Black and Red \$16.99	Black and Rose Red \$16.99			

[View all 17](#)

About this item

- Design: our powder puff is actually designed with triangle and circle style, when you put the foundation on your cheeks and forehead, you can use the round side, when you put foundation on the eye and contour, you can choose the triangle side. Say goodbye to uneven makeup!
- Comfortable and soft: this wet and dry dual-use makeup puff is made of fiber material, soft to touch, natural and even makeup, won't make your skin feel uncomfortable, it acts like a barrier against the skin and contour
- Normal size and hold well: each powder puff measures about 2.76 inch/ 7 cm, the normal size can fits your hand well, each makeup puff comes with 1 strap for you to hold well, and easier to use the powder applicator, the triangle shape makes the makeup on T-zone easier
- Save more powder and washable: the loose powder puffs are washable, you can easily clean them for secondary use, the short plush could help to save your foundation
- Wide applications: suitable for liquid foundation, barrier cream, BB cream, sunscreen, cushion, blush for wet use; Dry powder products such as body powder, pressed powder, loose powder, eye shadow, and honey powder for dry use

\$16.99
 Price when purchased online

Free shipping **Free Holiday returns until Jan 31**

Buy now
Add to cart

How you'll get this item:

Shipping Arrives between Oct 23 - Oct 28 Free	Pickup Not available	Delivery Not available
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475 Broome St. Chicago
 Arrives between **Oct 25 - Oct 28** | [More options](#)

Sold and shipped by [Redacted]

Report an issue with this seller
Extended holiday returns [Details](#)
 Free Holiday returns until Jan 31

[Add to list](#) [Add to registry](#)

Exemplars of Counterfeit Products Sold by Defendants

55. Plaintiff is the registered owner of the REA.DEEMING BEAUTY Trademarks and official source of REA.DEEMING BEAUTY Products. The United States Registrations for the

REA.DEEMING BEAUTY Trademarks (Exhibit 1) are in full force and effect. Upon information and belief, Defendants have knowledge of Plaintiff's rights in the REA.DEEMING BEAUTY Trademarks and are willfully infringing and intentionally using counterfeits of the REA.DEEMING BEAUTY Trademarks. Defendants' willful, intentional, and unauthorized use of the REA.DEEMING BEAUTY Trademarks is likely to cause and is causing confusion, mistake, and deception as to the origin and quality of the counterfeit goods among the general public.

56. Defendants' activities constitute willful trademark infringement and counterfeiting under 15 U.S.C. §§ 1114, 1117.

57. The injuries and damages sustained by Plaintiff have been directly and proximately caused by Defendants' wrongful reproduction, use, advertisement, promotion, offering to sell, and sale of Counterfeit Products.

58. Plaintiff has no adequate remedy at law, and, if Defendants' actions are not enjoined, Plaintiff will continue to suffer irreparable harm to its reputation and the goodwill of its well-known REA.DEEMING BEAUTY Trademarks.

SECOND CAUSE OF ACTION
FALSE DESIGNATION OF ORIGIN (15 U.S.C. § 1125(a) *et seq.*)
[Against Defendants Designated in Schedule A to the Complaint]

59. Plaintiff repeats and incorporates by reference herein its allegations contained in paragraphs 1–51 of this Complaint.

60. Defendants' promotion, marketing, offering for sale, and sale of counterfeit REA.DEEMING BEAUTY Products has created and is creating a likelihood of confusion, mistake, and deception among the general public as to the affiliation, connection, or association with Plaintiff or the origin, sponsorship, or approval of Defendants' Counterfeit Products by Plaintiff.

61. By using the REA.DEEMING BEAUTY Trademarks in connection with the sale of counterfeit REA.DEEMING BEAUTY products, Defendants create a false designation of origin and a misleading representation of fact as to the origin and sponsorship of the Counterfeit Products.

62. Defendants' conduct constitutes willful false designation of origin and misrepresentation of fact as to the origin and/or sponsorship of the Counterfeit Products to the general public under 15 U.S.C. §§ 1114, 1125.

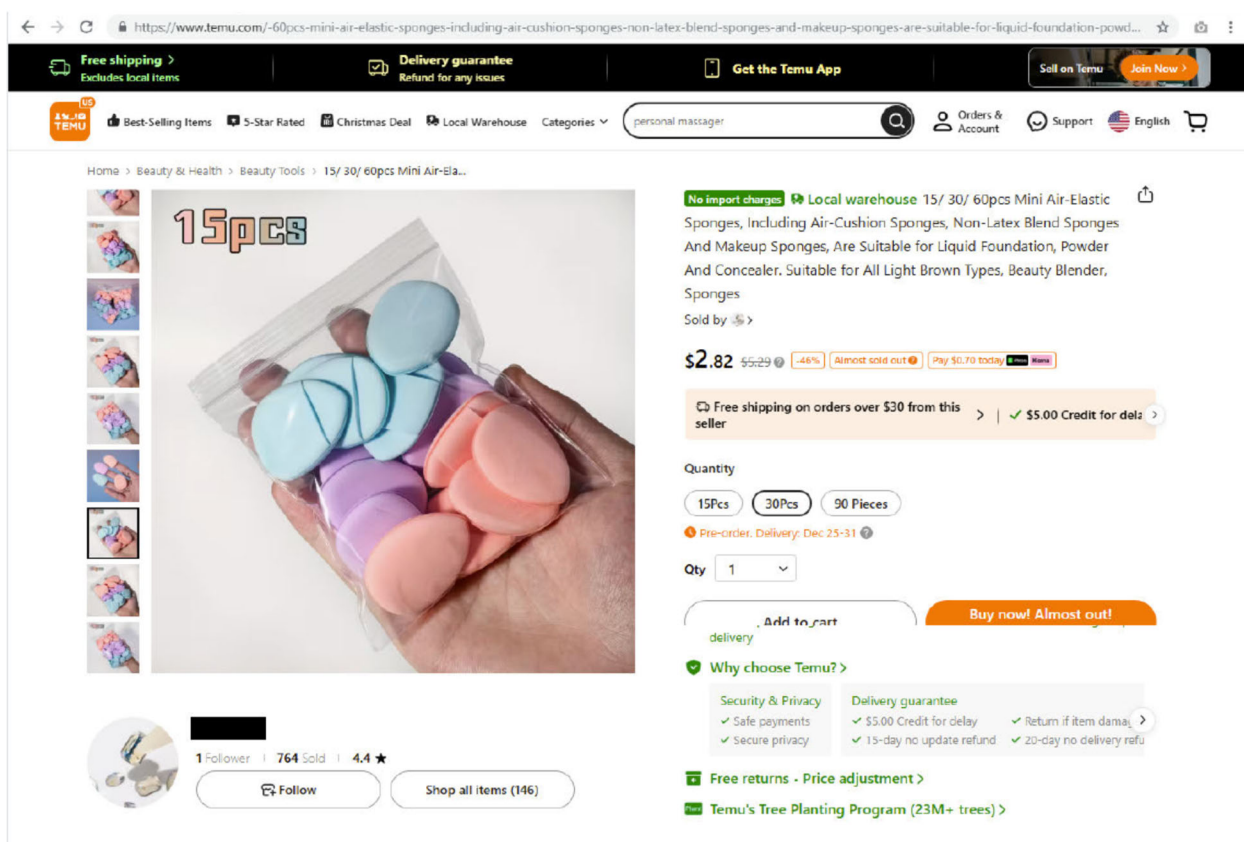
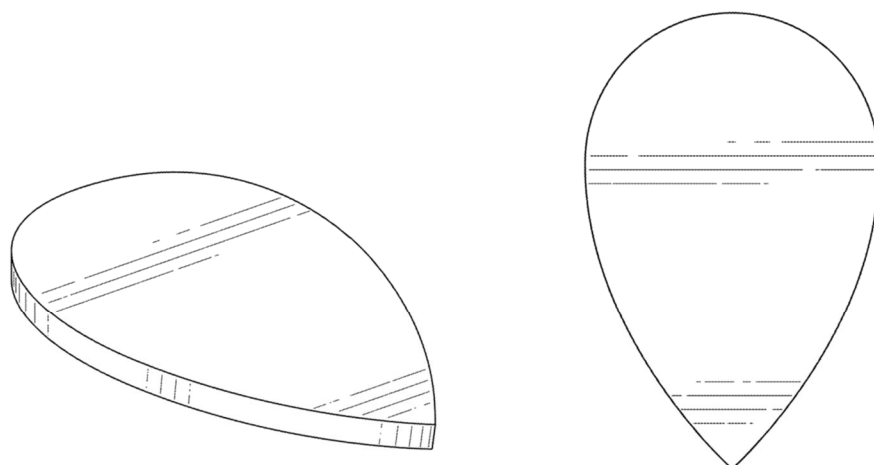
63. Plaintiff has no adequate remedy at law, and, if Defendants' actions are not enjoined, Plaintiff will continue to suffer irreparable harm to its reputation and the goodwill of its brand.

THIRD CAUSE OF ACTION
DESIGN PATENT INFRINGEMENT (35 U.S.C. § 271)
[Against Defendants Designated in Schedule A]

64. Plaintiff repeats and incorporates by reference herein its allegations contained in paragraphs 1–51 of this Complaint.

65. Defendants are and have been making, using, selling, offering for sale, and/or importing into the United States for subsequent sale or use, without authority, Counterfeit Products that infringe directly and/or indirectly the REA.DEEMING BEAUTY Patents.

66. For example, below is a comparison of figures from Plaintiff's REA.DEEMING BEAUTY Patents and images of one of Defendants' Counterfeit Products sold on a Defendant Internet Store.



Exemplary Counterfeit Products Sold on Defendant Internet Store

67. Defendants’ activities constitute willful patent infringement under 35 U.S.C. § 271.

68. Defendants have infringed the REA.DEEMING BEAUTY Patents through the aforesaid acts and will continue to do so unless enjoined by this Court. Defendants’ wrongful conduct has caused Plaintiff to suffer irreparable harm resulting from the loss of its lawful patent

rights to exclude others from making, using, selling, offering for sale, and importing the patented invention.

69. Plaintiff is entitled to injunctive relief pursuant to 35 U.S.C. § 283.

70. Plaintiff is entitled to recover damages adequate to compensate for the infringement pursuant to 35 U.S.C. §§ 284, 289, including Defendants' profits.

FOURTH CAUSE OF ACTION
UNFAIR COMPETITION (New York Common Law)
[Against Defendants Designated in Schedule A]

71. Plaintiff repeats and incorporates by reference herein its allegations contained in paragraphs 1–51 of this Complaint.

72. Plaintiff has not licensed or authorized Defendants to use the REA.DEEMING BEAUTY IP, and none of the Defendants are authorized retailers of genuine REA.DEEMING BEAUTY Products.

73. Defendants knowingly and intentionally trade upon Plaintiff's reputation and goodwill by selling, offering for sale, and/or importing products in connection with Plaintiff's REA.DEEMING BEAUTY IP.

74. Defendants' promotion, marketing, offering for sale, sale, and importing of Counterfeit Products has created and is creating a likelihood of confusion, mistake, and deception among the general public as to the quality, affiliation, connection, or association with Plaintiff or the origin, sponsorship, or approval of Defendants' Counterfeit Products by Plaintiff.

75. Defendants knew, or should have known, that their promotion, marketing, offering for sale, sale, and importing of Counterfeit Products has caused and will continue to cause confusion, mistake, and deception among purchasers, users, and the public.

76. In fact, Defendants have fraudulently represented by their statements and actions that the Counterfeit Products are Plaintiff's products including, for example, by: (i) using SEO

tactics and social media to misdirect customers seeking REA.DEEMING BEAUTY Products to the Defendant Internet Stores; (ii) using deceptive advertising practices within the text and metadata of the Defendant Internet Stores; and (iii) taking other steps to deceive and confuse the consuming public.

77. On information and belief, Defendants' conduct is willful and intentional as Defendants attempt to avoid liability by concealing their identities, using multiple fictitious names and addresses to register and operate their illegal counterfeiting operations and Defendant Internet Stores.

78. Plaintiff has no adequate remedy at law, and Defendants' conduct has caused Plaintiff to suffer damage to its reputation and goodwill. Unless enjoined by the Court, Plaintiff will suffer future irreparable harm as a direct result of Defendants' unlawful activities.

DEMAND FOR RELIEF

79. Plaintiff hereby demands judgment as follows:

- a. That Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under, or in active concert with them be temporarily, preliminarily, and permanently enjoined and restrained from:
 - i. using the REA.DEEMING BEAUTY Trademarks or any reproductions, counterfeit copies, or colorable imitations thereof in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine REA.DEEMING BEAUTY Product or is not authorized by Plaintiff to be sold in connection with the REA.DEEMING BEAUTY Trademarks;

- ii. passing off, inducing, or enabling others to sell or pass off any product as a genuine REA.DEEMING BEAUTY Product or any other product produced by Plaintiff that is not Plaintiff's or not produced under the authorization, control, or supervision of Plaintiff and approved by Plaintiff for sale under the REA.DEEMING BEAUTY Trademarks;
 - iii. committing any acts calculated to cause consumers to believe that Defendants' Counterfeit Products are those sold under the authorization, control, or supervision of Plaintiff, or are sponsored by, approved by, or otherwise connected with Plaintiff;
 - iv. further infringing the REA.DEEMING BEAUTY Trademarks and damaging Plaintiff's goodwill;
 - v. shipping, delivering, holding for sale, transferring, or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for Plaintiff, nor authorized by Plaintiff to be sold or offered for sale, and which bear any Plaintiff trademark, including the REA.DEEMING BEAUTY Trademarks or any reproductions, counterfeit copies, or colorable imitations thereof;
- b. That Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under, or in active concert with them be temporarily, preliminarily, and permanently enjoined and restrained from:
- i. making, using, offering for sale, selling, and/or importing into the United States for subsequent sale or use any products not authorized by Plaintiff

and that include any reproduction, embodiment, copy or colorable imitation of the designs claimed in the REA.DEEMING BEAUTY Patents;

- ii. passing off, inducing, or enabling others to sell or pass off any product as a genuine REA.DEEMING BEAUTY Product or any other product produced by Plaintiff that is not Plaintiff's or not produced under the authorization, control, or supervision of Plaintiff and approved by Plaintiff for sale under the REA.DEEMING BEAUTY Patents;
 - iii. further infringing the REA.DEEMING BEAUTY Patents and damaging Plaintiff's goodwill;
 - iv. aiding, abetting, contributing to, or otherwise assisting anyone in infringing upon the REA.DEEMING BEAUTY Patents;
 - v. shipping, delivering, holding for sale, transferring, or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for Plaintiff, nor authorized by Plaintiff to be sold or offered for sale, and which infringe the REA.DEEMING BEAUTY Patents; and
 - vi. operating and/or hosting online marketplace accounts at the Defendant Internet Stores that are involved with the distribution, marketing, advertising, offering for sale, or sale of any product infringing the REA.DEEMING BEAUTY Patents;
- c. Entry of an Order that the Marketplace Platforms, including without limitation Amazon, DHGate, eBay, Shein, Temu, Walmart, and any other online

marketplace account through which Defendants are selling Counterfeit Products disable and cease displaying any advertisement used by or associated with Defendants in connection with their sale of Counterfeit Products;

- d. That Defendants account for and pay to Plaintiff all profits realized by Defendants by reason of Defendants' unlawful acts herein alleged, and that the amount of damages for infringement of the REA.DEEMING BEAUTY Trademarks be increased by a sum not exceeding three times the amount thereof as provided by 15 U.S.C. § 1117;
- e. That Plaintiff be awarded all profits realized by Defendants from Defendants' infringement of Plaintiff's REA.DEEMING BEAUTY Patents, pursuant to 35 U.S.C. § 289, but in no event less than a reasonable royalty for the use made of the invention by the Defendants, together with interest and costs, pursuant to 35 U.S.C. § 284;
- f. That the amount of damages awarded to Plaintiff to compensate Plaintiff for infringement of Plaintiff's REA.DEEMING BEAUTY Patents be increased by three times the amount thereof, as provided by 35 U.S.C. § 284;
- g. In the alternative, that Plaintiff be awarded statutory damages pursuant to 15 U.S.C. § 1117(c) of not less than \$1,000 and not more than \$2,000,000 for each and every use of the REA.DEEMING BEAUTY Trademarks, and statutory damages pursuant to 35 U.S.C. § 289 of not less than \$250 for each and every use of the REA.DEEMING BEAUTY Patents;
- h. That Plaintiff be awarded its reasonable attorneys' fees and costs; and
- i. Award any and all other relief that this Court deems just and proper.

DEMAND FOR JURY TRIAL

80. Plaintiff hereby demands a trial by jury.

Dated: April 20, 2026

Respectfully,

/s/ Christopher Tom

Christopher Tom, Esq. (S.D.N.Y. Bar No. CT1983)

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INC.*