

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**SHENZHEN ANDELIAN
TECHNOLOGY CO., LTD.,**

Plaintiff,

v.

**VEVOR STORE LLC, converted
from VEVOR STORE INC.;
SANVEN TECHNOLOGY LTD.;
BOZHOUTAIZHUOLANKEJI
YOUXIANGONGSI d/b/a VEVOR
SHOP; and
BOZHOUYOUTEBEIKEJI
YOUXIANGONGSI d/b/a
SUPLANDER,**

Defendants,

CASE No: 4:26-cv-06208

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Shenzhen Andelian Technology Co., Ltd. (“Plaintiff” or “Andelian”), by and through undersigned counsel, files this Complaint for patent infringement against Defendants VEVOR STORE LLC, converted from VEVOR STORE INC. (“VEVOR Store”); Sanven Technology Ltd. (“Sanven”); BOZHOUTAIZHUOLANKEJIYOUXIANGONGSI doing business as VEVOR Shop (“VEVOR Shop”); and BOZHOUYOUTEBEIKEJIYOUXIANGONGSI doing business as Suplander (“Suplander”) (collectively, “Defendants”), and alleges as follows:

NATURE OF THE ACTION

1. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. § 1 et seq.

2. Defendants make, use, offer for sale, sell, and import into the United States VEVOR-branded sewer inspection camera products that infringe U.S. Patent No. 11,493,455 B1, entitled “Detector and Detecting System for Protecting Transmission Line Therein” (the “455 Patent”).

3. The accused products include, at minimum, two VEVOR-branded sewer camera and pipe inspection products purchased by Plaintiff from Amazon.com and shipped into this District: (i) ASIN B0FPBZ2R5N, corresponding to VEVOR model WP9602B; and (ii) ASIN B0DNMFPQ9L, corresponding to VEVOR model WP90FTR (collectively, the “Accused Products”). The same Accused Products are sold and offered for sale through VEVOR’s U.S. -facing website, vevor.com, and are made available for in-District pickup through VEVOR’s Houston, Texas retail and pickup location.

4. Defendants participate in a coordinated, commonly branded VEVOR commercial enterprise through which the Accused Products are designed, sourced, imported, marketed, offered for sale, sold, fulfilled, distributed, and made available for pickup to customers in the United States, including Texas and this District. As alleged below, the U.S.-facing components of that enterprise are operated from a single shared business address at 9166 Anaheim Place, Suite 250, Rancho Cucamonga, California 91730, by Defendants VEVOR Store and Sanven.

THE PARTIES

5. Plaintiff Shenzhen Andelian Technology Co., Ltd. is a company organized and existing under the laws of the People's Republic of China, with its principal place of business at Rooms 1622–1630, Building 74, Yixiu New Village, Baishilong Community, Minzhi Subdistrict, Longhua District, Shenzhen, Guangdong Province, China.

6. Plaintiff owns all right, title, and interest in U.S. Patent No. 11,493,455 B1, including the right to sue for past, present, and future infringement and to recover damages. A copy of the '455 Patent is attached as Exhibit A.

7. Defendant VEVOR STORE LLC (CA Entity No. 3811127, "VEVOR Store") is a California limited liability company with its principal place of business at 9166 Anaheim Place, Suite 250, Rancho Cucamonga, California 91730. VEVOR Store's California Statement of Information, filed on May 7, 2025, identifies that same address as its principal office, mailing address, and California office.

8. California Secretary of State records show that VEVOR STORE INC converted from a California stock corporation into VEVOR STORE LLC on or about October 28, 2024. The same records further show that VEVOR STORE INC was previously named SSVEVOR LTD before changing its name to VEVOR STORE INC on or about January 18, 2023. The conversion did not affect the entity's obligations or liabilities.

9. VEVOR Store's California Statement of Information identifies Yanping Wang as VEVOR Store's manager or member and registered agent for service of

process, with the same address at 9166 Anaheim Place, Suite 250, Rancho Cucamonga, California 91730. The Statement of Information identifies VEVOR Store's business as "Warehousing and logistics, international trade."

10. Public-facing materials directly associate VEVOR Store with VEVOR's U.S. commercial operations. The Google Play listing for the VEVOR mobile application identifies VEVOR STORE LLC as the developer and entity associated with the VEVOR App, and describes the App as a "VEVOR Shopping Store for Home Improvement DIYers and Professionals." Apple's App Store listing likewise identifies VEVOR STORE INC as the developer and provider of the "VEVOR Home Improvement Tools" shopping application. The developer privacy policy link on the Apple App Store listing directs users to VEVOR's Privacy & Security page on vevor.com, which states that the VEVOR Sites entities act as joint controllers of personal data and that the Company operates the Services and the sale of VEVOR-branded products. Public Google sponsored search results for vevor.com further identify "Vevor Store Inc" in connection with VEVOR's official website and VEVOR-branded tools and equipment.

11. Defendant Sanven Technology Ltd. ("Sanven") is a California corporation (CA Entity No. 5335817) with its principal place of business and mailing address at 9166 Anaheim Place, Suite 250, Rancho Cucamonga, California 91730, the same suite as Defendant VEVOR Store. Sanven's California Secretary of State Statement of Information, filed October 31, 2025, identifies Fuyu Jiao as Sanven's Chief Executive Officer, Secretary, Chief Financial Officer, and agent for service of

process; Mengdong Zhu as Sanven's Treasurer; and Xiangqin Bai as Sanven's sole director. Sanven's Statement of Information lists Sanven's "Type of Business" as "Warehousing and logistics, international trade," the identical business description that appears in VEVOR Store's California Statement of Information.

12. VEVOR product manuals for the Accused Products, including VEVOR models WP9602B and WP90FTR, list Sanven under the heading "Imported to USA" and provide Sanven's address at 9166 Anaheim Place, Suite 250, Rancho Cucamonga, California 91730. **Exhibit B.** Upon information and belief, Sanven is the U.S. importer of record for the Accused Products and imports the Accused Products into the United States, including for sale and distribution to customers in this District.

13. Defendant BoZhouTaiZhuoLanKeJiYouXianGongSi d/b/a VEVOR Shop ("VEVOR Shop") is, upon information and belief, a Chinese business entity operating the Amazon seller account "VEVOR Shop" (Seller ID: A2HED9DYJHJBSJ). Amazon's seller profile identifies VEVOR Shop's business address as No. 26, Zhaoyangzhuang Village, Dawang Administrative Village, Niuji Town, Qiaocheng District, Bozhou City, Anhui Province 236800, China. **Exhibit C.** VEVOR Shop offers for sale and sells VEVOR-branded sewer camera and pipe inspection products, including the Accused Product corresponding to ASIN B0FPBZ2R5N and VEVOR model WP9602B, to customers in the United States, including Texas and this District.

14. Defendant BoZhouYouTeBeiKeJiYouXianGongSi d/b/a Suplander (“Suplander”) is, upon information and belief, a Chinese business entity operating the Amazon seller account “Suplander” (Seller ID: A6Y0MPTDX8T1G). Amazon’s seller profile identifies Suplander’s business address as No. 27, Zhaoyangzhuang Village, Dawang Administrative Village, Niuji Town, Qiaocheng District, Bozhou City, Anhui Province 236800, China. **Exhibit D.** Suplander offers for sale and sells VEVOR-branded sewer camera and pipe inspection products, including the Accused Product corresponding to ASIN B0DNMFPQ9L and VEVOR model WP90FTR, to customers in the United States, including Texas and this District.

THE COMMON VEVOR COMMERCIAL ENTERPRISE

15. VEVOR Store and Sanven identify the same office suite—Suite 250 at 9166 Anaheim Place, Rancho Cucamonga, California 91730—as their respective principal places of business. Their respective California Secretary of State Statements of Information also describe their business activities in identical terms: “Warehousing and logistics, international trade.” These overlapping corporate disclosures support an inference that VEVOR Store and Sanven coordinate warehousing, logistics, and international-trade activities from the same location.

16. Texas Comptroller records further associate VEVOR Store and Sanven with commercial registrations in Texas:

(a) The Texas Comptroller’s Sales and Use Tax Permit database identifies VEVOR STORE INC under Taxpayer ID 32091859473 and lists its Texas Sales and Use Tax permit as “Active.” The database lists VEVOR

STORE INC's mailing address as 9166 Anaheim Place, Suite 250, Rancho Cucamonga, California 91730. Separate franchise tax account records identify the same entity and taxpayer number, although its right to transact business in Texas is currently listed as "Forfeited." Exhibit E.

(b) Texas Comptroller franchise tax account records identify Sanven Technology Ltd. under Texas Taxpayer Number 32092188450 and list its mailing address as 9166 Anaheim Place, Suite 250, Rancho Cucamonga, California 91730, the same address used by VEVOR Store. The records list Sanven's right to transact business in Texas as "Active." Exhibit E.

17. Upon information and belief, VEVOR Store and Sanven operate as a single, integrated U.S. commercial enterprise that designs, sources, imports, markets, sells, fulfills, and distributes VEVOR-branded products, including the Accused Products. Indicia of that single-enterprise operation include, without limitation: (a) a single shared office at 9166 Anaheim Place, Suite 250, Rancho Cucamonga, California; (b) identical self-described "Type of Business" in their respective California Statements of Information ("Warehousing and logistics, international trade"); (c) shared use of the VEVOR brand, trademarks, model numbers, product specifications, packaging, and product manuals; (d) Texas Comptroller records identifying both entities under taxpayer numbers and the same out-of-state mailing address, including VEVOR STORE INC's active Texas Sales and Use Tax permit and Sanven's active franchise-tax status; (e) coordinated importation, distribution, and fulfillment of VEVOR-branded products through

common U.S. infrastructure, including vevor.com, the VEVOR mobile application, marketplace storefronts, and the VEVOR-branded Houston pickup location; and (f) upon information and belief, common beneficial ownership, control, or coordinated management.

18. Upon information and belief, VEVOR Shop and Suplander are commonly controlled, related, or coordinated Amazon sellers and participate in the same VEVOR commercial enterprise as VEVOR Store and Sanven. Their Amazon seller business addresses are adjacent locations—No. 26 and No. 27, Zhaoyangzhuang Village, Dawang Administrative Village, Niuji Town, Qiaocheng District, Bozhou City, Anhui Province 236800, China. Both sellers source, market, and sell VEVOR-branded sewer camera and pipe inspection products that correspond in branding, model numbers, specifications, packaging, and documentation to the same model products marketed and sold through vevor.com, the VEVOR mobile application, and the VEVOR-branded Houston pickup location.

JURISDICTION AND VENUE

19. This Court has subject-matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a) because this action arises under the patent laws of the United States, including 35 U.S.C. §§ 271 et seq.

20. This Court has personal jurisdiction over each Defendant because each Defendant has purposefully directed infringing conduct at Texas and this District. Defendants have offered for sale, sold, shipped, imported, distributed, and made available for pickup the Accused Products in Texas and in this District, and have

purposefully availed themselves of the privilege of conducting business in Texas. Plaintiff's claims arise out of and relate to those forum-directed activities.

21. As an additional and alternative basis for personal jurisdiction over Defendants VEVOR Shop and Suplander, this Court may exercise jurisdiction under Federal Rule of Civil Procedure 4(k)(2). VEVOR Shop and Suplander are foreign business entities organized under the laws of the People's Republic of China, with business addresses in Bozhou City, Anhui Province, China. Plaintiff's claims arise under federal patent law, including 35 U.S.C. § 271. Upon information and belief, neither VEVOR Shop nor Suplander is subject to personal jurisdiction in any State's courts of general jurisdiction. Each has nonetheless purposefully directed commercial activities involving the Accused Products toward the United States, including offers for sale, sales, shipments, and fulfillment to customers throughout the United States through Amazon.com, and has thereby established sufficient contacts with the United States as a whole to satisfy due process. Plaintiff's purchases of the Accused Products from VEVOR Shop and Suplander, which were shipped from China and delivered to Texas, are representative examples of those United States-directed contacts. Exercising jurisdiction over VEVOR Shop and Suplander in this District is consistent with the United States Constitution and laws of the United States.

22. Venue is proper as to Defendant VEVOR Store in this District under 28 U.S.C. § 1400(b) because VEVOR Store has committed acts of infringement in this

District and maintains a regular and established place of business in this District at 10951 FM 1960, Houston, Texas 77070 (the “Houston Location”).

23. VEVOR’s public-facing Pickup Guide identifies the Houston Location as “FM 1960 (VEVOR Home Improvement)” and provides its address, dedicated telephone number, and regular business hours seven days per week. The Guide further explains that customers may select “Pickup” or “Ship to Store” through vevor.com and retrieve their purchases at the Houston Location. The Houston Location is therefore a physical, stable, and continuously operating location from which VEVOR business is conducted. Exhibit F.

24. Upon information and belief, the Houston Location is a place of VEVOR Store. Apple’s App Store identifies VEVOR STORE INC as the developer and provider of the VEVOR shopping application, and the developer privacy policy links directly to vevor.com, which holds out the Houston Location as a VEVOR retail and pickup location. Upon information and belief, VEVOR Store’s employees or agents are regularly and physically present at the Houston Location to process customer pickups, distribute VEVOR-branded products, and otherwise conduct VEVOR Store’s business. VEVOR Store has committed acts of infringement in this District by offering for sale, selling, distributing, and making the Accused Products available for pickup through vevor.com, the VEVOR mobile application, and the Houston Location.

25. Venue is proper as to Sanven in this District under 28 U.S.C. § 1400(b) because Sanven has committed acts of infringement in this District and, upon

information and belief, maintains and uses the Houston Location as a regular and established place of business through employees or agents who regularly conduct Sanven's importation, distribution, fulfillment, and customer-pickup activities at that location. VEVOR product manuals identify Sanven as the U.S. importer of the Accused Products, and Sanven's importation and distribution of those products for sale and delivery in this District constitute acts of infringement giving rise to this action. Exhibit B.

26. Venue is proper as to VEVOR Shop and Suplander under 28 U.S.C. § 1391(c)(3). VEVOR Shop and Suplander are business entities organized under the laws of the People's Republic of China and are not residents of the United States. Each may therefore be sued in any judicial district.

FACTUAL BACKGROUND

27. The '455 Patent. The '455 Patent issued on November 8, 2022, to inventor Ping Yu and claims priority to Chinese Patent Application No. 202122946372.1 filed on November 26, 2021. Plaintiff owns all right, title, and interest in the '455 Patent, including the right to sue for past, present, and future infringement and to recover damages. Exhibit A.

28. The '455 Patent relates to detector and pipe inspection systems that use a camera probe and cable assembly to inspect pipelines, ducts, and other inaccessible spaces. Key claimed features include a probe; first and second connectors; an elastic member arranged between and connecting the connectors and defining an internal passage; a transmission line arranged in the internal passage; and a flexible

protector arranged in the internal passage and configured to protect the transmission line from bending or stretching.

29. Plaintiff purchased two VEVOR-branded sewer camera and pipe inspection products through Amazon.com, and both Accused Products were delivered to Texas. The first product is ASIN B0FPBZ2R5N, sold by VEVOR Shop, corresponding to VEVOR model WP9602B. Exhibit C. The second product is ASIN B0DNMFPQ9L, sold by Suplander, corresponding to VEVOR model WP90FTR. Exhibit D.

30. The Amazon Listings Are Part of the Common VEVOR Enterprise. The Amazon listings for the Accused Products are not isolated third-party listings. They use VEVOR branding, model numbers, photographs, specifications, and product descriptions that correspond to the same model products offered through vevor.com. Specifically, ASIN B0FPBZ2R5N corresponds to VEVOR model WP9602B, the accused 98-foot sewer camera product; and ASIN B0DNMFPQ9L corresponds to VEVOR model WP90FTR, the accused 165-foot sewer camera with locator. Upon information and belief, the Amazon listings, vevor.com product pages, VEVOR mobile application, and VEVOR product manuals reflect a coordinated VEVOR-branded commercialization network for the Accused Products operated and coordinated by Defendants.

31. Sanven's Role as U.S. Importer. The VEVOR product manuals shipped with the Accused Products identify Sanven Technology Ltd., 9166 Anaheim Place, Suite 250, Rancho Cucamonga, California 91730, as the U.S. importer of the

VEVOR-branded pipe inspection systems. Exhibit B at 14, 33. Upon information and belief, Sanven imports or causes the Accused Products to be imported into the United States and distributes or causes them to be distributed in the United States, including in this District, in coordination with VEVOR Store and the other Defendants.

32. VEVOR's U.S.-facing website and Pickup Guide identify a VEVOR retail and pickup location in this District, designated "VEVOR Home Improvement Houston" or "FM 1960 (VEVOR Home Improvement)," at 10951 FM 1960, Houston, Texas 77070. Exhibit F at 14. The Pickup Guide states that customers may place orders online and pick up products from a nearby pickup location, including the Houston Location, and may complete pickup by presenting a Pickup Receipt. *Id.* Through the Houston Location, VEVOR-branded products, including the Accused Products, are offered for sale, sold, fulfilled, distributed, and made available for pickup to customers in Texas and this District.

COUNT I
DIRECT INFRINGEMENT OF U.S. PATENT NO. 11,493,455
(35 U.S.C. § 271)

33. Plaintiff incorporates by reference the allegations set forth in paragraphs 1 through 32 of this Complaint as if fully set forth herein.

34. The Accused Products practice each limitation of at least claims 1 and 15 of the '455 Patent. Among other features, each Accused Product includes a probe; first and second connectors; an elastic member arranged between and connected to the first and second connectors and defining an internal passage; a transmission

line arranged within the internal passage; and a flexible protector arranged within the internal passage and configured to protect the transmission line and its connections.

35. In violation of 35 U.S.C. § 271(a), Defendants VEVOR Store, Sanven, VEVOR Shop, and Suplander have directly infringed and continue to directly infringe one or more claims of the '455 Patent, including at least claims 1 and 15, by engaging in one or more of the acts of making, using, offering for sale, selling, or importing the Accused Products in or into the United States without Plaintiff's authorization.

36. VEVOR Shop has directly infringed and continues to directly infringe the '455 Patent by offering for sale and selling the Accused Product corresponding to ASIN B0FPBZ2R5N and VEVOR model WP9602B, and by shipping the same to customers in Texas and this District.

37. Suplander has directly infringed and continues to directly infringe the '455 Patent by offering for sale and selling the Accused Product corresponding to ASIN B0DNMFPQ9L and VEVOR model WP90FTR, and by shipping the same to customers in Texas and this District.

38. Sanven has directly infringed and continues to directly infringe the '455 Patent by importing the Accused Products into the United States for sale and distribution to U.S. customers, including customers in this District, and by offering for sale, selling, and distributing the Accused Products in the United States, including through the Houston Location.

39. VEVOR Store has directly infringed and continues to directly infringe the '455 Patent by offering for sale, selling, fulfilling, distributing, or otherwise commercializing the Accused Products in the United States, including through vevor.com, the VEVOR mobile application, the Houston Location, and the common VEVOR commercial enterprise alleged above.

40. Defendants have no license, authorization, or consent from Plaintiff to make, use, offer for sale, sell, import, distribute, or otherwise commercialize products that practice the '455 Patent.

41. Defendants have actual knowledge of the '455 Patent and of their infringement thereof no later than the date of service of this Complaint. Defendants' continued infringement of the '455 Patent following such knowledge is and will be willful, deliberate, and in conscious disregard of Plaintiff's rights, entitling Plaintiff to enhanced damages under 35 U.S.C. § 284 and to a finding that this is an exceptional case warranting an award of attorneys' fees under 35 U.S.C. § 285.

42. Defendants' infringing acts have caused and will continue to cause Plaintiff damages in an amount to be proven at trial. Plaintiff is entitled to recover damages adequate to compensate for Defendants' infringement under 35 U.S.C. § 284, together with pre-judgment and post-judgment interest.

43. Unless enjoined, Defendants will continue to infringe the '455 Patent, causing Plaintiff irreparable harm for which there is no adequate remedy at law.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Shenzhen Andelian Technology Co., Ltd. respectfully requests that the Court enter judgment in its favor and against Defendants as follows:

A. Declaring that Defendants have infringed one or more claims of U.S. Patent No. 11,493,455 B1;

B. Entering judgment that each Defendant has directly infringed and continues to directly infringe the '455 Patent under 35 U.S.C. § 271(a);

C. Awarding Plaintiff damages adequate to compensate for Defendants' infringement under 35 U.S.C. § 284, including Plaintiff's lost profits or a reasonable royalty, or both, in an amount to be proven at trial, together with an accounting if necessary to ascertain the full extent of Defendants' infringement;

D. Finding that Defendants' infringement has been and is willful, and awarding enhanced damages under 35 U.S.C. § 284 of up to three times the damages found or assessed;

E. Finding this case exceptional under 35 U.S.C. § 285 and awarding Plaintiff its reasonable attorneys' fees;

F. Awarding Plaintiff pre-judgment and post-judgment interest at the maximum rate permitted by law;

G. Awarding Plaintiff its costs and expenses incurred in this action;

H. Preliminarily and permanently enjoining Defendants, their officers, agents, servants, employees, attorneys, and all persons in active concert or participation with them, from further infringement of the '455 Patent; and

I. Granting such other and further relief, at law or in equity, as the Court deems just and proper.

JURY TRIAL DEMAND

Plaintiff hereby demands a jury trial on all issues so triable.

Dated: July 31, 2026

Respectfully submitted,

/s/ Ruoting Men

Ruoting Men

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CERTIFICATE OF SERVICE

The foregoing Complaint is an initiating pleading that will be served on Defendants together with the summons under Federal Rule of Civil Procedure 4. Because the Complaint is served under Rule 4, no service or certificate of service under Federal Rule of Civil Procedure 5(b) is required at this time.

/s/ Ruoting Men
Ruoting Men