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WATKINS MANUFACTURING CORPORATION

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

WATKINS MANUFACTURING
CORPORATION,

Plaintiff,

v.

LIUYANG GUANYANG TRADING
CO., LTD.,

Defendant.

Case No.: **'26CV4480 AGS MSB**

ORIGINAL COMPLAINT

Plaintiff Watkins Manufacturing Corporation (“Plaintiff” or “Watkins”) demands a jury trial and alleges as follows:

PARTIES

1. Watkins d/b/a Watkins Wellness, is a corporation organized and existing under the laws of the State of California and doing business in the State of California. Watkins holds by assignment all rights, title, and interest in the below-described patent. Watkins’s principal place of business is located at 1280 Park Center Drive, Vista, California 92081.

2. Watkins alleges on information and belief that Defendant Liuyang Guanyang Trading Co., Ltd. (“Defendant” or “Liuyang”) is a business entity headquartered in Changsha City, Hunan, China.

1 3. On information and belief, Defendant sells its products in the United
2 States through various eCommerce platforms, including, but not limited to, the
3 Amazon Marketplace under the name “PRFCTTY.”

4 **NATURE OF THE ACTION**

5 4. This is a civil action for patent infringement arising under the Patent Laws
6 of the United States, 35 U.S.C. §§ 101, et seq.

7 **JURISDICTION**

8 5. The Court has subject matter jurisdiction over the federal claims in this
9 action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

10 6. This Court has personal jurisdiction over the Defendant under
11 California’s long-arm statute because the Defendant does business in California. Cal.
12 Civ. Proc. Code § 410.10. This Court also has personal jurisdiction because: (1) the
13 Defendant solicits and conducts business in California, (2) this action arises out of
14 Defendant’s solicitation and execution of business in California, and (3) the assertion
15 of personal jurisdiction over the Defendant comports with the notions of fair play and
16 justice. *Id.*

17 **VENUE**

18 7. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b)
19 because a substantial part of the events giving rise to the claims herein occurred within
20 this judicial district. In addition, venue is properly found in this judicial district
21 pursuant to 28 U.S.C. § 1391(c)(3) because Defendant, who is not resident in the
22 United States, is subject to personal jurisdiction in this district.

23 **FACTUAL ALLEGATIONS**

24 8. Watkins markets and distributes its products domestically in all 50 states
25 of the United States and globally distributes its products in more than 70 countries via
26 a network of independent retailers and dealers serving both residential and commercial
27 customers.

28 9. Watkins is an innovator within the hot tub and spa industry and maintains

1 a portfolio of patents that covers products that Watkins manufactures and distributes.

2 10. Among its many innovations, Watkin's designed, developed and
3 manufactures a water care system, the FreshWater® Salt System (the "System"),
4 which generates chlorine to sanitize spa water.

5 11. The System is used in multiple Watkins product lines, including Hot
6 Spring® Highlife® Collection, Limelight® Collection, and Hot Spot® Collection
7 spas, and Caldera Spas® Utopia Series, Paradise® Series, and Vacanza® Series spas.

8 12. The System includes a housing, which is accessible on the spa, and a
9 disposable and consumer replaceable electrode cartridge supported within the housing.
10 Watkins manufactures and sells its electrode cartridge under the product name
11 FreshWater® Salt System Cartridge (hereinafter referred to as the "Cartridge"):



22 <https://www.hotspring.com/shop/water-care/authentic-freshwater-cartridges>

1 Freshwater Salt System Replacement Cartridge (3 pack)
2 #80004



13 [https://www.calderaspapartsplus.com/freshwater-salt-system-replacement-cartridge-](https://www.calderaspapartsplus.com/freshwater-salt-system-replacement-cartridge-3-pack-80004/)
14 [3-pack-80004/](https://www.calderaspapartsplus.com/freshwater-salt-system-replacement-cartridge-3-pack-80004/)

15 Freshwater Salt System Replacement Cartridge (3 pack)
16 #80004



27 [https://www.calderaspapartsplus.com/freshwater-salt-system-replacement-cartridge-](https://www.calderaspapartsplus.com/freshwater-salt-system-replacement-cartridge-3-pack-80004/)
28 [3-pack-80004/](https://www.calderaspapartsplus.com/freshwater-salt-system-replacement-cartridge-3-pack-80004/)

13. The Cartridge includes a pair of mixed metal oxide coated titanium electrodes with integrated electrical contacts. In operation of the System, an electric current is delivered to the Cartridge and passed between the electrodes while spa water is routed through the housing that removably supports the Cartridge. The electric current initiates a chemical reaction within the spa water flowing through the housing and generates chlorine. The chlorine, in turn, disinfects the spa water by destroying bacteria and other potential pathogens. Each Cartridge is designed to last at least 4 months.

14. Watkins sells and distributes its Cartridges through authorized dealers, and consumers can purchase the Cartridges directly from Watkin's authorized dealers and online resellers.

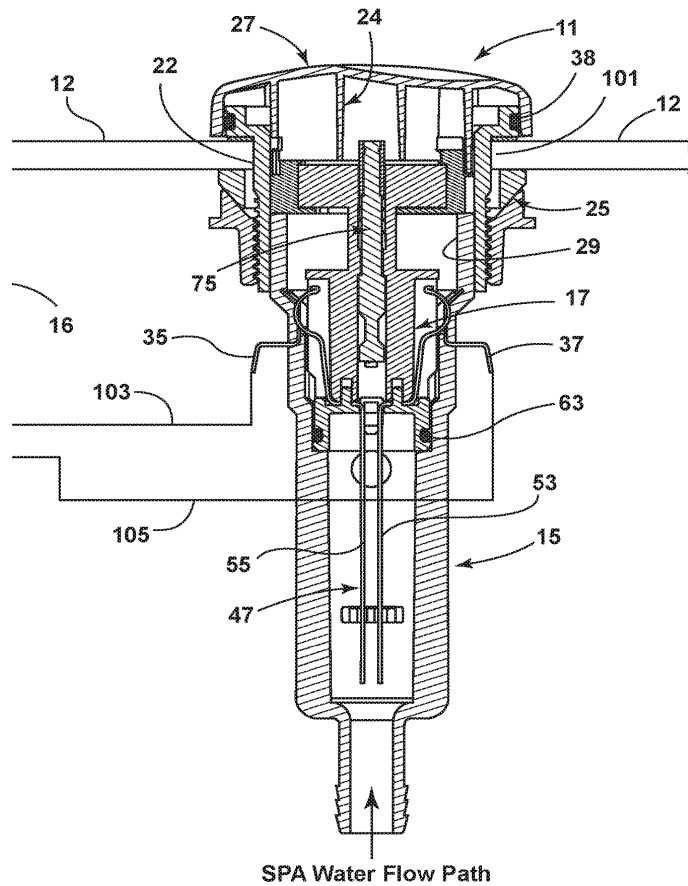
WATKINS' PATENT

15. Watkins filed U.S. Application No. 15/651,709 on July 17, 2017, which issued as U.S. Patent No. 11,407,661 (the “’661 Patent”), titled “Chlorine Generator System,” on August 9, 2022. A copy of the ’661 Patent is attached as **Exhibit 1**.

16. Watkins is owner of the '661 Patent, with all substantive rights in and to the '661 Patent, including the sole and exclusive right to prosecute this action and enforce the '661 Patent against infringers, and to collect damages for all relevant times.

17. As shown, for example, in FIGS. 1 and 6 (reproduced below), the specification of the '661 Patent teaches a disposable and consumer replaceable electrode cartridge (17) that can be removably installed in an electrode cartridge housing (15) as part of a chlorine generator (11) for spas, tubs, pools, and the like. The disclosed electrode cartridge comprises a handle (51) and carries a pair of spaced apart electrodes (53, 55). In the example shown, the electrodes (53, 55) each extend from respective rectangular vertical portions (52, 54) to electrical contacts (57, 59) that make electrical contact with electrical contact terminals (34, 36) of the housing (15) when the electrode cartridge (17) is installed in the housing (15).

/ / /



**FIG. 1 of the '661 Patent
(Partial Reproduction)**

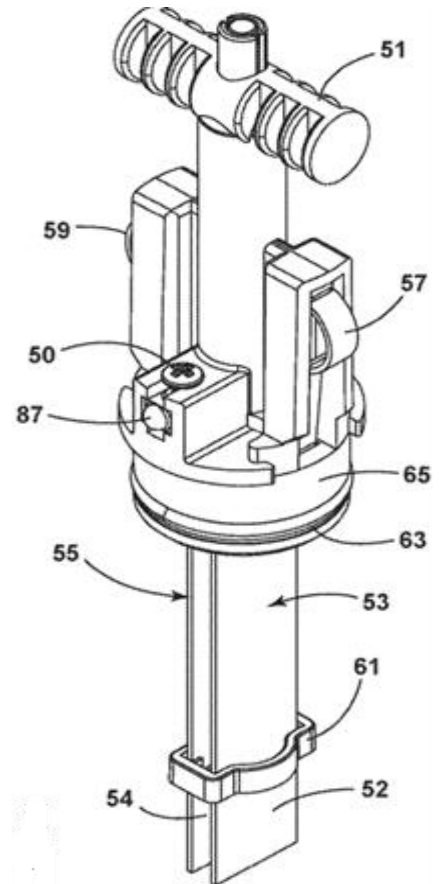


FIG. 6 of the '661 Patent

18. By way of example and not limitation, claim 1 of the '661 Patent recites an electrode cartridge constructed to generate chlorine and to purify spa water and shaped to be installed into and removed from a housing by a user of a spa. The electrode cartridge recited in claim 1 includes a handle, an electrode holder located beneath the handle, first and second electrodes spaced horizontally apart so as to create a flow path for electrical current between them, and first and second electrical contacts so positioned on the cartridge as to respectively contact first and second electrical contacts on the housing when the electrode cartridge is installed in the housing.

COUNT ONE – DIRECT PATENT INFRINGEMENT OF THE '661 PATENT
PURSUANT TO 35 U.S.C. § 271

19. Plaintiff incorporates the allegations in Paragraph 1 – 18 above as if fully restated herein.

20. Defendant is making, using, selling, offering to sell, and/or importing into the United States salt system cartridges sold under the brand name PRFCTTY (the “Infringing Model”). It does so primarily through eCommerce platforms, including, but not limited to Amazon:



https://www.amazon.com/Cartridge-Compatible-Limelight-Generating-Treatment/dp/B0G7TD9TKP/ref=sr_1_3?dib=eyJ2IjojMSJ9.BvQxTnGyGY22qao6rMjtid7OPmWIArsE-d2R8jEk-phtTRLL_1_qsXTeqgwLWQVLP_WY6UU4hZcp16n0TwhY9k_SgT2oUD38ebDLag6zuQ6kMKVfCInc-QdknMMTgFX9PDdTJl1NJpRcOLrLjhqJ8Q.rRi0HI90jx5VQgsGQU7I8tdljbYn5OAhn_TJ4NhGS24&dib_tag=se&m=A1S7JES6JTV3PZ&marketplaceID=ATVPDKIKX0DER&nsdOptOutParam=true&qid=1782831466&s=merchant-items&sr=1-3

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https://www.amazon.com/Cartridge-Compatible-Limelight-Generating-Treatment/dp/B0G7TD9TKP/ref=sr_1_3?dib=eyJ2IjoiMSJ9.BvQxTnGyGY22qao6rMjtid7OPmWIArsE-d2R8jEk-phtTRLL_1_qsXTeqgwLWQVLP_WY6UU4hZcp16n0TwhY9k_SgT2oUD38ebDLag6zuQ6kMKVfCInc-QdknMMTgFX9PDdTJl1NJpRcOLrLjhqJ8Q.rRi0HI90jx5VQgsGQU7I8tdljbYn5OAhn_TJ4NhGS24&dib_tag=se&m=A1S7JES6JTV3PZ&marketplaceID=ATVPDKIKX0DER&nsdOptOutParam=true&qid=1782831466&s=merchant-items&sr=1-3
(last visited June 30, 2026).

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https://www.amazon.com/Cartridge-Compatible-Limelight-Generating-Treatment/dp/B0G7TD9TKP/ref=sr_1_3?dib=eyJ2IjoiMSJ9.BvQxTnGyGY22qao6rMjtid7OPmWIArsE-d2R8jEk-phfTRLL_1qsXTeqgwLWQVLP_WY6UU4hZcp16n0TwhY9k_SgT2oUD38ebDLag6zuQ6kMKVfCInc-QdknMMTgFX9PDdTJl1NJpRcOLrLjhqJ8Q.rRi0HI90jx5VQgsGQU7I8tdljbYn5OAhN_TJ4NhGS24&dib_tag=se&m=A1S7JES6JTV3PZ&marketplaceID=ATVPDKIKX0DER&nsdOptOutParam=true&qid=1782831466&s=merchant-items&sr=1-3 (last visited June 30, 2026).

21. Defendant describes the Infringing Model as a “Salt System Cartridge [that] keeps water clean and sanitized automatically,” featuring “a titanium chlorine generator” that by way of “[e]lectrolysis converts salt into chlorine to sanitize water, then naturally returns to salt – Delivers months of clean, balanced, crystal-clear water with minimal maintenance.” Exhibit 2¹ at pp. 3-4.

¹ **Exhibit 2** – PRFCTTY “Salt System Cartridge Compatible with Hot Springs & Caldera Spas & Hot Tubs, Hot Springs Highlife, Limelight, Chlorine Generating Salt System Filter, Spa Water Treatment Cartridge (1 Pack)” Screen Captures, PRFCTTY listing - Amazon.com,

22. Defendant further describes the Infringing Model as being “compatible with Hot Springs & Caldera Spas,” and that it is “Designed for Hot Spring Highlife, Limelight, and Hot Spot series, as well as Caldera Spas Utopia, Paradise, and Vacanza models.” *Id.*

23. As further described in the claim charts attached as **Exhibit 3** and incorporated fully herein by reference, the Infringing Model meets each element of at least claim 1 of the ’661 Patent.

24. Accordingly, Defendant infringes the ’661 Patent in violation of 35 U.S.C. § 271 by making, using, offering to sell, selling, and/or importing into the United States the Infringing Model.

25. Based on information and belief, Defendant has committed this act of infringement willfully and with full knowledge of the ’661 Patent and with utter disregard for Watkins’ rights therein.

DEMAND FOR JURY TRIAL

26. Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Watkins demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Watkins respectfully prays that this Court enter judgment against Defendant, as follows:

1. For an Order adjudging Defendant to have infringed the ’661 Patent;
2. For an Order adjudging Defendant to have willfully infringed the ’661 Patent;
3. For an Order enjoining Defendant from directly or indirectly infringing

https://www.amazon.com/Cartridge-Compatible-Limelight-Generating-Treatment/dp/B0G7TD9TKP/ref=sr_1_3?dib=eyJ2IjoiMSJ9.BvQxTnGyGY22qao6rMjtid7OPmWIArsE-d2R8jEk-phfTRLL_1_qsXTeqgwLWQVLP_WY6UU4hZcp16n0TwhY9k_SgT2oUD38ebDLag6zuQ6kMKVfCInc-QdknMMTgFX9PDdTJI1NJpRcOLrLjhqJ8Q.rRi0HI90jx5VQgsGQU7I8tdljYn5OAhN_TJ4NhGS24&dib_tag=se&m=A1S7JES6JTV3PZ&marketplaceID=ATVPDKIKX0DER&nsdOptOutParam=true&qid=1782831466&s=merchant-items&sr=1-3 (last visited June 30, 2026).

1 the '661 Patent;

2 4. For an Order requiring Defendant to deliver up and/or destroy any and all
3 products infringing, directly or indirectly, the '661 Patent in its possession together
4 with any means for producing the same;

5 5. For an accounting of all of Defendant's gains, profits, and advantages
6 derived by Defendant's infringement on the '661 Patent, and for an award of monetary
7 damages adequate to fully compensate Plaintiff for Defendant's past infringement and
8 any continuing or future infringement up until judgment is entered, including
9 Plaintiff's lost profits but in no event less than reasonable royalty;

10 6. For an award of treble damages and/or exemplary damages because of
11 Defendant's willful misconduct under 35 U.S.C. §§ 284 and/or 285;

12 7. For an Order that this is an exceptional case and for an award of attorneys'
13 fees and costs under 35 U.S.C. § 285;

14 8. For an award of costs, expenses, and pre-judgment and post-judgment
15 interest at the maximum legal rate in an amount to be proven at time of trial; and

16 9. For any other relief as the Court deems just and proper.

17
18 Dated: August 5, 2026

VORYS, SATER, SEYMOUR AND PEASE LLP

19 Respectfully submitted,

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*Pro Hac Vice Applications forthcoming

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