

Zheng Liu, Esq. (SBN: 229311)  
zheng.liu@rimonlaw.com  
RIMON, P.C.  
800 Oak Grove Avenue, Suite 250  
Menlo Park, CA 94025  
Telephone: 650.382.4546  
Facsimile: 650.461.4433

Shelley Ivan, Esq.  
Shelley.ivan@rimonlaw.com  
100 Park Avenue 16th Floor  
New York, NY 10017  
Telephone: 332.600.4332  
Fax: 212.363.0270

*Attorneys for Plaintiff* AKRURA PTE. LTD

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

AKRURA PTE. LTD., a Singapore  
company,

Plaintiff,

vs.

APERO TECHNOLOGIES GROUP, a  
Vietnam company, BEGAMOB  
GLOBAL, and TRUSTED TOOLS &  
UTILITIES APPS,

Defendants.

Case No.: 2:23-cv-102

**COMPLAINT FOR**

- (1) FEDERAL COPYRIGHT INFRINGEMENT**
- (2) FEDERAL UNFAIR COMPETITION**
- (3) CALIFORNIA UNFAIR COMPETITION**
- (4) UNJUST ENRICHMENT**

**JURY TRIAL DEMANDED**

1  
2 Plaintiff Akrura PTE. LTD. (“Plaintiff”), by and through its attorneys of  
3 record, alleges the following against Defendants, Apero Technologies Group,  
4 Begamob Global, and Trusted Tools & Utilities Apps (collectively, “Defendants”) upon information and belief:

6 **THE PARTIES**

7 1. Plaintiff has its principal place of business at 7 One-North Gatgeway,  
8 #01-03, Singapore 138642.

9 2. Plaintiff is the creator and copyright owner of the Blood Pressure  
10 mobile application (“BP App”) and offers BP App on Google Play through the  
11 QR Code Scanner developer account.

12 3. Plaintiff was founded and is currently managed by Mingyang Jiao.

13 4. Defendant Apero Technologies Group (“Apero”) has its principal  
14 place of business at 2 Le Van Thiem, Thanh Xuan, Hanoi, Vietnam, but Plaintiff  
15 was unable to verify this information.

16 5. Apero has a website at <https://apero.vn/> and uses the following email  
17 addresses: [hr@apero.vn](mailto:hr@apero.vn), [hautd@apero.vn](mailto:hautd@apero.vn), and [trustedapp.help@gmail.com](mailto:trustedapp.help@gmail.com),  
18 although at least one of these emails appears to be invalid, and Apero never  
19 responded to emails sent to any of its email addresses.

20 6. Apero offers the infringing Blood Pressure Tracker mobile  
21 application (“BP Tracker App”) on Google Play through its Apero Technologies  
22 Group developer account.

23 7. Apero also offers at least two other infringing mobile applications on  
24 Google Play using other developer accounts, including: (i) Blood Pressure  
25 Tracker App (“BP Begamob App”) through defendant Begamob Global’s  
26  
27  
28

1 developer account; and (ii) Blood Pressure App: BP Monitor (“BP Monitor App”)  
2 through defendant Trusted Tools & Utilities Apps’ developer account.

3 8. Upon information and belief, Defendant Begamob Global is a mobile  
4 application developer that offers mobile applications on Google Play and it is  
5 owned by or related to Apero. Defendant Begamob Global has a website at  
6 <http://www.begamob.com> and uses the email address [info@begamob.com](mailto:info@begamob.com).  
7 Plaintiff was unable to obtain information about the place of business for this  
8 Defendant.

9 9. Upon information and belief, Defendant Tools & Utilities Apps is a  
10 mobile application developer that offers mobile applications on Google Play and it  
11 is owned by or related to Apero. Defendant Tools & Utilities Apps does not  
12 appear to have a website but uses the email address  
13 [liveroyalstudio.inc@gmail.com](mailto:liveroyalstudio.inc@gmail.com). Plaintiff was unable to obtain information about  
14 the place of business for this Defendant.

15 10. At such times as Plaintiff learns more information about the identities  
16 and involvement of defendants Begamob Global and Trusted Tools & Utilities  
17 Apps, Plaintiff will amend this Complaint accordingly.

### 18 **JURISDICTION AND VENUE**

19 11. The Court has subject matter jurisdiction over this action pursuant to  
20 28 U.S.C. § 1331 (federal question jurisdiction) and 28 U.S.C. § 1338 (action  
21 arising under an Act of Congress relating to copyrights).

22 12. This action is brought under the Copyright Act of 1976, as amended  
23 (17. U.S.C. § 101 *et seq.*) and as applicable though the Berne Convention and  
24 Federal Unfair Competition under Section 43 of the Lanham Act (15 U.S.C. §  
25 1125).  
26  
27  
28

1           13. The Court has supplemental jurisdiction over the state claims  
2 pursuant to 28 U.S.C. § 1367(a) in that they are related to the federal claims and  
3 arise from the same nucleus of operative facts.

4           14. Venue is proper in this District pursuant to 28 U.S.C. § 1391 because  
5 this is the judicial district where: (i) Defendants are conducting business and  
6 committing copyright infringement and other illegal acts, giving rise to the  
7 referenced claims; and (ii) Defendants are subject to personal jurisdiction.

8           15. Defendants are not residents of the United States. Therefore,  
9 pursuant to 28 § U.S.C. 1391(c)(3), Defendants may be sued in any judicial  
10 district, including this District.

11           16. Defendants' infringing mobile applications are available throughout  
12 the United States. Notably, after Plaintiff had launched its BP App and generated  
13 considerable user traffic and advertising income, Defendants surreptitiously  
14 launched the infringing BP Tracker App, Begamob App, and BP Monitor App  
15 ("Infringing Apps") using the same content as Plaintiff's product and targeting the  
16 same consumers.

17           17. As a result, consumers in this District have been downloading  
18 Defendants' Infringing Apps, and Defendants have been compensated by the  
19 advertising income generated by Defendants' illegal activities.

20           18. Defendants thus purposefully availed themselves of the benefits of  
21 this District. And Defendants have wrongfully injured Plaintiff by soliciting and  
22 transacting their illegal business with the stolen copyrighted content in this  
23 District.



**BACKGROUND FACTS**

19. On November 17, 2021, Plaintiff released the BP App on Google Play and quickly started generating considerable user traffic and resulting advertising income.

20. On July 24, 2022, Apero released the infringing BP Tracker App on Google Play using the same content as on Plaintiff's BP App and targeting the same consumers on Google Play.

21. On August 12, 2022, Plaintiff discovered the infringing BP Tracker App on Google Play. After comparing the two mobile applications, Plaintiff determined that the infringing BP Tracker had copied the language and interface layout of the BP App.

22. On August 17, 2022, Plaintiff submitted to Google a DMCA Takedown Request, which was assigned Case No. 1-5031000033050. *See Exhibit A.* In the DMCA Takedown Request, Plaintiff explained that Apero had copied the BP App language word for word. In support of its statement, Plaintiff submitted a side-by-side comparison of the two mobile applications clearly showing that Apero was using Plaintiff's content, including the language and the interface layout. *See Exhibit A.*

23. Google responded the same day stating that Plaintiff should attempt to resolve this issue with Apero. *See Exhibit A.*

24. On August 29, 2022, Plaintiff's attorney emailed Apero at hr@apero.vn and trustedapp.help@gmail.com, advising them that Apero's BP Tracker App infringed Plaintiff's BP App and asked them to change the infringing content. Apero did not respond. *See Exhibit B.*

1           25. On August 30, 2022, after receiving a notification that the email  
2 address hr@apero.vn was invalid, Plaintiff's attorney resent the August 29, 2022  
3 email to trustedapp.help@gmail.com. Apero did not respond. *See Exhibit B.*

4           26. On September 23, 2022, after Plaintiff advised Google about its  
5 unsuccessful attempts to contact Apero, Google responded that it could not find  
6 the infringing BP Tracker App and later requested additional evidence.

7           27. Plaintiff provided additional evidence, but Google asked Plaintiff to  
8 submit a new DMCA Takedown Request.

9           28. Plaintiff then checked Apero's infringing BP Tracker App, which  
10 was substantially the same as before.

11           29. On October 18, 2022, Plaintiff filed a second DMCA Takedown  
12 Request, which was assigned Case No. 9-1815000033310. *See Exhibit C.* In that  
13 request, Plaintiff explained that Apero's BP Tracker App was still infringing  
14 Plaintiff's BP App, including the language and user interface layout. To support  
15 its statement, Plaintiff submitted a side-by-side comparison of the two mobile  
16 applications clearly showing that Apero was using Plaintiff's content. *See*  
17 **Exhibit C.**

18           30. On December 13, 2022, Google removed Apero's infringing BP  
19 Tracker App.

20           31. On December 23, 2022, Google notified Plaintiff that Apero had  
21 submitted a counter notification, as described in 17 U.S.C. § 512(g). Google also  
22 advised Plaintiff that Google would reinstate the infringing BP Tracking App  
23 unless Plaintiff filed a lawsuit or a claim of infringement against Apero with the  
24 U.S. Copyright Office Copyright Claims Board in 10 business days from the  
25 December 23, 2022 notice. *See Exhibit D.*

26           32. In response, Plaintiff retained counsel and proceeded to prepare to  
27 file its lawsuit against Apero.



1           39. Plaintiff's copyrighted BP App is not "United States work" pursuant  
2 to 17 U.S.C. § 101 and is not subject to the registration requirement under 17  
3 U.S.C. § 411(a).

4           40. Plaintiff's copyrighted BP App is available to Defendants on the  
5 internet, and Defendant have access to it.

6           41. Defendants used the content of Plaintiff's BP App, including its  
7 language and interface layout, to create the BP Tracker App, the BP Begamob  
8 App, and the BP Utilities App.

9           42. A side-by-side comparison of Plaintiff's BP App and Defendants' BP  
10 Tracker App shows that Defendants copied the content of Plaintiff's BP App and  
11 that the two products contain identical language excerpts and are substantially  
12 similar. *See Exhibits A and C.*

13           43. A side-by-side comparison of Plaintiff's BP App and Defendants' BP  
14 Utilities App shows that Defendants copied the content of Plaintiff's BP App and  
15 that the two products contain identical language excerpts and are substantially  
16 similar. *See Exhibit E.*

17           44. A side-by-side comparison of Plaintiff's BP App and Defendants' BP  
18 Begamob App shows that Defendants copied the content of Plaintiff's BP App  
19 and that the two products contain identical language excerpts and are substantially  
20 similar. *See Exhibit F.*

21           45. Plaintiff did not authorize Defendants to copy the content of the  
22 copyrighted BP App. Defendants thus unlawfully appropriated Plaintiff's  
23 protectable expression and created counterfeits from Plaintiff's valuable content.

24           46. Defendants' infringing conduct violates 17 U.S.C. §§ 106(1)-(3), (5)  
25 and 17 U.S.C. § 501(a).

1           47. Defendants damaged Plaintiff by intentionally copying Plaintiff's  
2 valuable content and using counterfeits to target the same consumers and tap into  
3 Plaintiff's previously generated user traffic and related advertising income.

4           48. Defendants also damaged Plaintiff by offering its inferior counterfeit  
5 apps to Plaintiff's consumer base and causing a current and long-term reputational  
6 damage to Plaintiff.

7           49. Although Plaintiff advised defendant Apero that Apero was  
8 infringing Plaintiff's copyrighted BP App, Apero disregarded Plaintiff's notice  
9 and continued to infringe. Apero's infringing activity was thus willful, intentional  
10 and purposeful.

11           50. Defendants damaged Plaintiff in an amount to be determined at trial.

12           51. Unless enjoined and restrained by the Court, Defendants' conduct is  
13 causing and will continue to cause Plaintiff irreparable injury that cannot be  
14 compensated by monetary damages. Pursuant to 17 U.S.C. § 502, Plaintiff is  
15 entitled to a preliminary and permanent injunction prohibiting further  
16 infringement of Plaintiff's copyrighted work.

## 17                                   **SECOND CLAIM**

### 18                   **Unfair Competition (Lanham Act Sec. 43(a), 15 U.S.C. § 1125)**

19           52. Plaintiff incorporates by reference the allegations set forth in  
20 paragraphs 1-52.

21           53. Defendants engaged in unfair competition in violation of Section  
22 43(a) of the Lanham Act, 15 U.S.C. § 1125 (a) by offering on the internet the  
23 counterfeit versions of Plaintiff's original copyrighted BP App in a manner that is  
24 likely to cause and have caused confusion as to the origin, sponsorship and  
25 approval of such products.



**FOURTH CLAIM**

**Unjust Enrichment**

64. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-63.

65. As a result of Defendants' infringing activities against Plaintiff, Defendants have been unjustly enriched by tapping into Plaintiff's stream of income from the same consumer base and taking away from Plaintiff's revenue.

66. There is no express contract between Plaintiff and Defendants that would allow Plaintiff to recover any damages.

67. Defendant has retained the benefit of the unjust enrichment. Plaintiff is entitled to recover from the Defendants the amount by which Defendants were unjustly enriched, including profits and advantages that Defendants have gained as a result of their infringing conduct.

68. Plaintiff is entitled to recover damages based on Defendants' unjust enrichment in an amount to be proven at trial.

**PRAYER FOR RELIEF**

69. Accordingly, Plaintiff prays for judgment against Defendants as follows:

- a) A judgment in favor of Plaintiff against Defendants on all claims;
- b) That pursuant to 17 U.S.C. § 502, the Court issue a preliminary and permanent injunction enjoining and restraining Defendants from offering Defendants' infringing mobile applications;
- c) That the Court award Plaintiff damages sufficient to compensate Plaintiff for Defendants' wrongful conduct;
- d) That pursuant to 15 U.S.C. § 1117(a), the Court award Plaintiff three times Defendants' profits, any damages sustained by Plaintiff, and the cost of this action;

- 1 e) That the Court award Plaintiff reasonable attorneys' fees;  
2 f) That the Court award Plaintiff pre-judgment and post-judgment  
3 interest; and  
4 g) That the Court award Plaintiff such other and further relief as the  
5 Court deems just and proper.

6 **JURY TRIAL DEMAND**

7 70. Plaintiff hereby demands a jury trial on all triable issues.

8  
9 Dated: January 6, 2023

**RIMON, P.C.**

10 By: /s/ Zheng Liu

11 Zheng Liu (SBN: 229311)  
12 800 Oak Grove Avenue, Suite 250  
13 Menlo Park, CA 94025  
14 Telephone: 650.382.4546  
15 Fax: 650.461.4433  
16 Email: zheng.liu@rimonlaw.com

17 Shelley Ivan  
18 (*pro hac vice* pending)  
19 100 Park Avenue 16th Floor  
20 New York, NY 10017  
21 Telephone: 332.600.4332  
22 Fax: 212.363.0270  
23 Email: shelley.ivan@rimonlaw.com

24 *Attorneys for Plaintiff*  
25 AKRURA PTE. LTD.  
26  
27  
28



# EXHIBIT A

**From:** [removals@google.com](mailto:removals@google.com) <[removals@google.com](mailto:removals@google.com)>  
**Sent:** Wednesday, August 17, 2022 2:28 PM  
**To:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>  
**Subject:** Re: Your Request to Google [1-5031000033050]

Hello,

Thanks for reaching out to us.

Regarding the following URLs:

<https://play.google.com/store/apps/details?id=com.bloodpressurechecker.bpmonitor.bptracker&gl=us>

We note that the developer in question has provided contact information in their application listing. Please confirm that you have first attempted to resolve this issue with the developer of the application in question by contacting them at [Trustedapp.help@gmail.com](mailto:Trustedapp.help@gmail.com).

Regards,

The Google Team

For more information about our content removal process access [g.co/legal](https://g.co/legal).

## Report alleged copyright infringement

Country of residence  
United States

Full legal name  
David Silver

Company name  
Bayramoglu Law Offices LLC

Full legal name of the copyright holder you represent

JIAO MINGYANG

Contact email address

[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)

Identify and describe the copyrighted work

The text within our client's blood pressure mobile application has been copied word for word, as can be seen in the highlighted portion of the attachment being filed herewith.

Where can we see an authorized example of the work?

<https://play.google.com/store/apps/details?id=bloodpressure.bloodpressureapp.bloodpressuretracker&hl=en&gl=us>

Allegedly infringing URLs

<https://play.google.com/store/apps/details?id=com.bloodpressurechecker.bpmonitor.bptracker&gl=us>

Attach a screenshot of the allegedly infringing material

Comparison Material 0812.pdf

I have a good faith belief that use of the copyrighted materials described above as allegedly infringing is not authorized by the copyright owner, its agent, or the law.

**Please check to confirm**

The information in this notification is accurate and I swear, under penalty of perjury, that I am the copyright owner or am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

**Please check to confirm**

I understand that a copy of the notice may be sent to the developer of the affected content.

**Please check to confirm**

Signature

David Silver

# Supplementary Materials of Complaint

**Our Original App:** <https://play.google.com/store/apps/details?id=bloodpressure.bloodpressureapp.bloodpressuretracker>

## Blood Pressure App

QR Code Scanner.

Contains ads

4.6★

151K reviews

10M+

Downloads

E

Everyone



**Infringing App:** <https://play.google.com/store/apps/details?id=com.bloodpressurechecker.bpmonitor.bptracker>

## Blood Pressure Tracker

Apero Technologies Group - TrustedApp

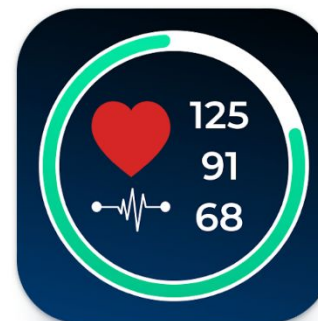
Contains ads

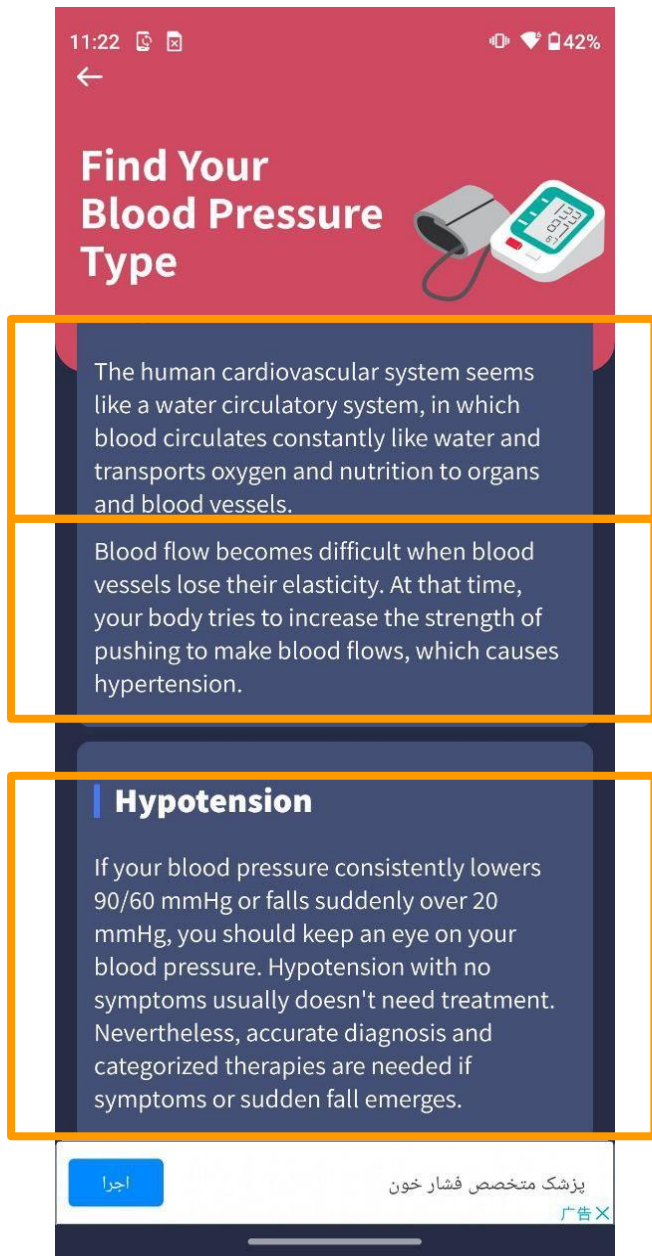
1K+

Downloads

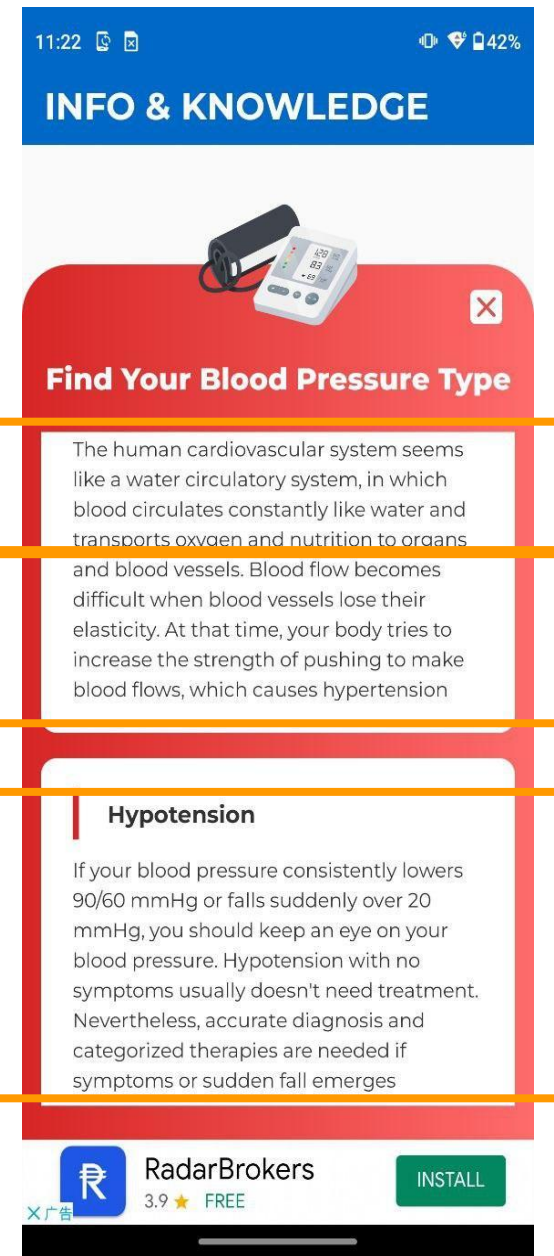
E

Everyone

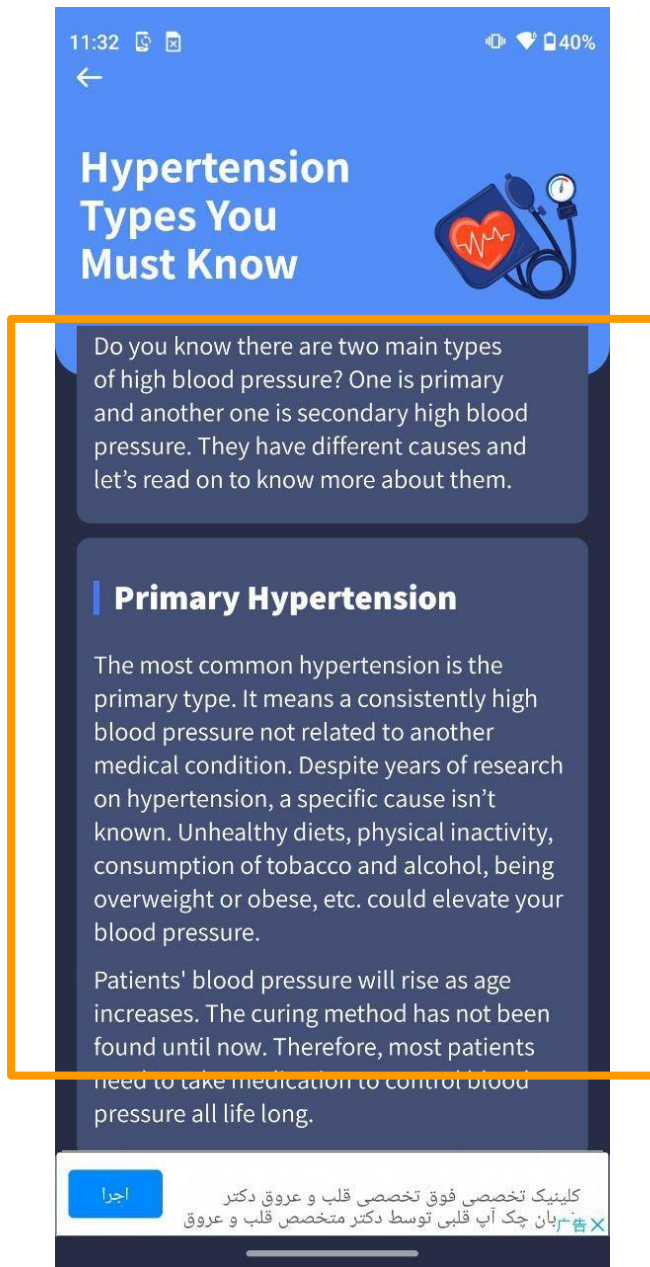




Our Copyrighted App



Allegedly Infringing App

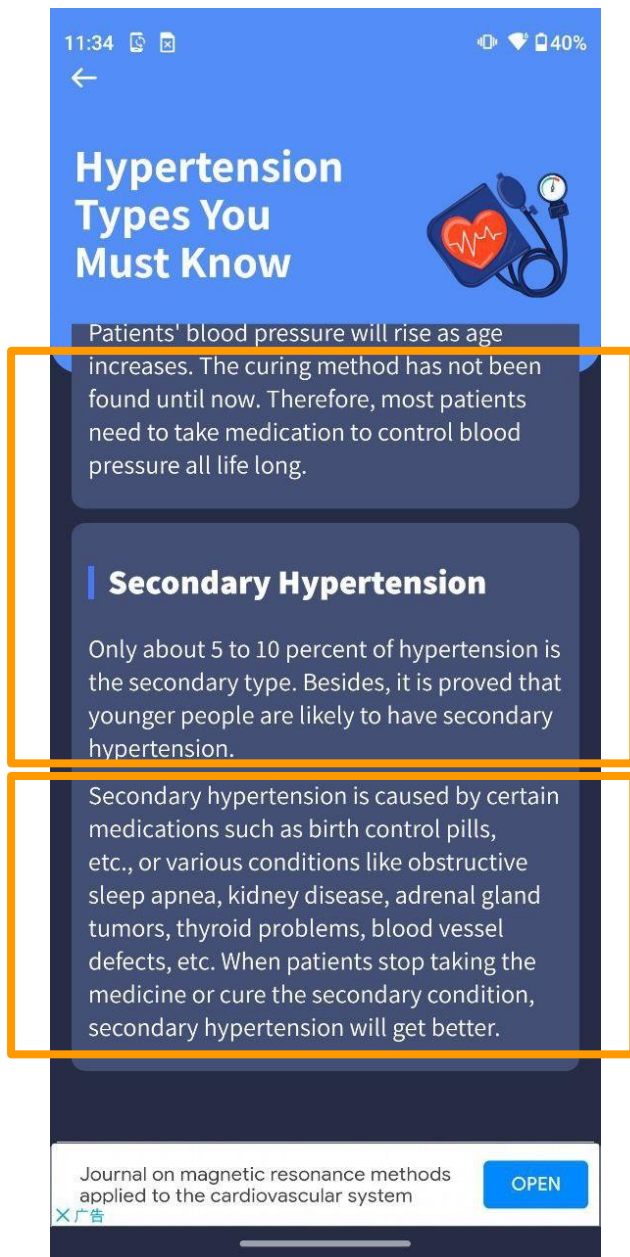


Our Copyrighted App

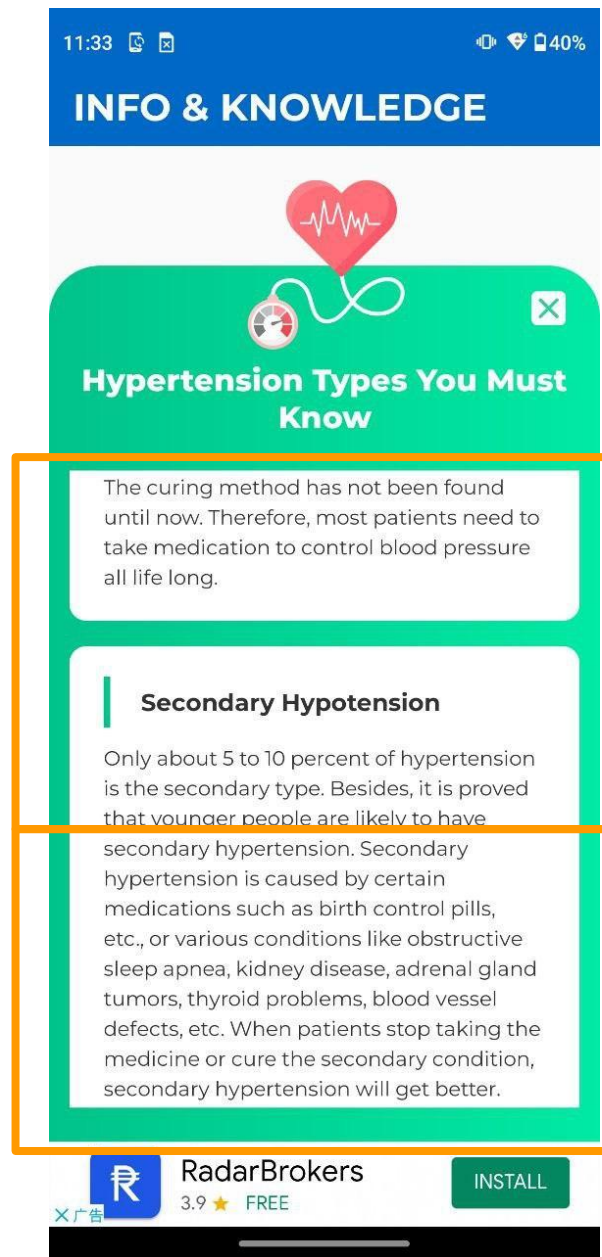


Allegedly Infringing App

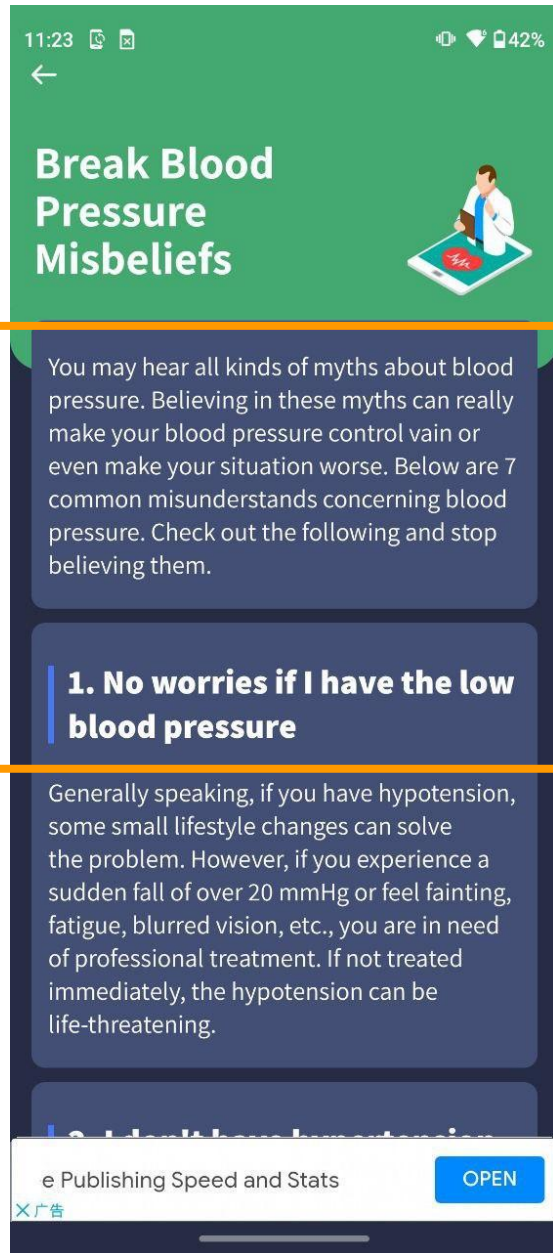




Our Copyrighted App



Allegedly Infringing App

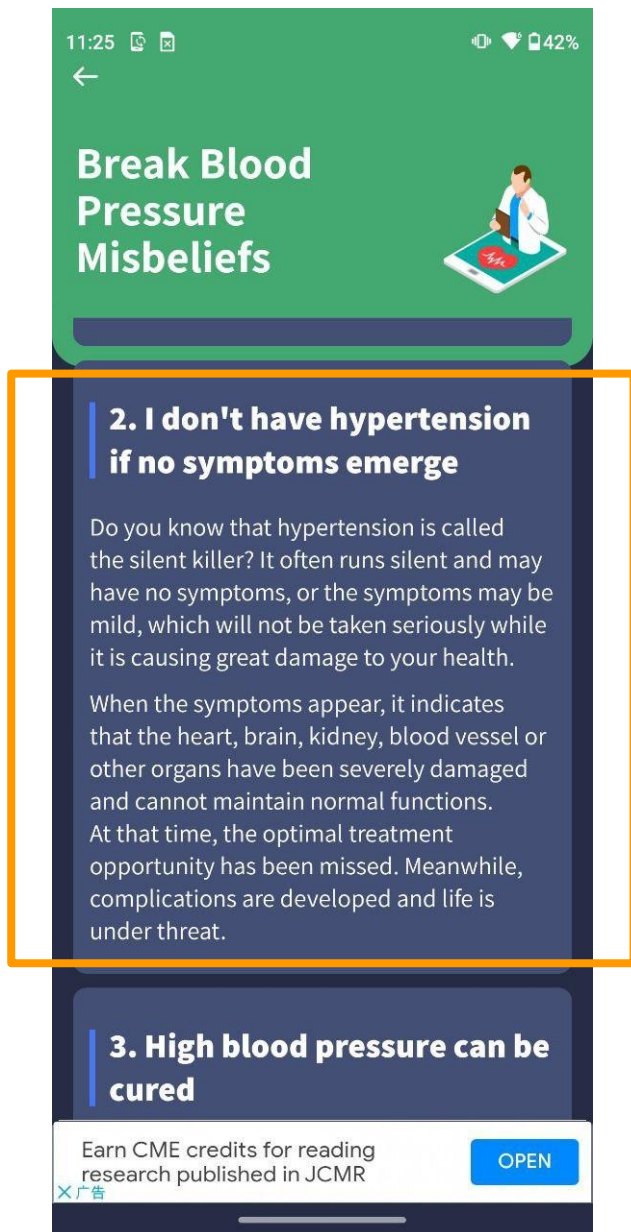


Our Copyrighted App

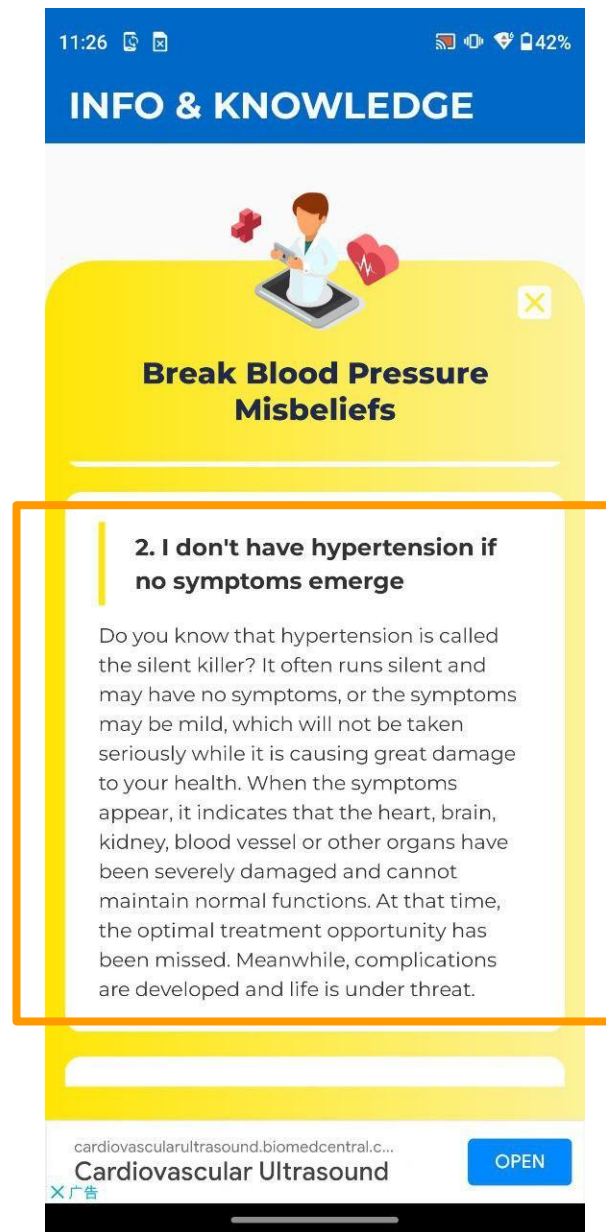


Allegedly Infringing App

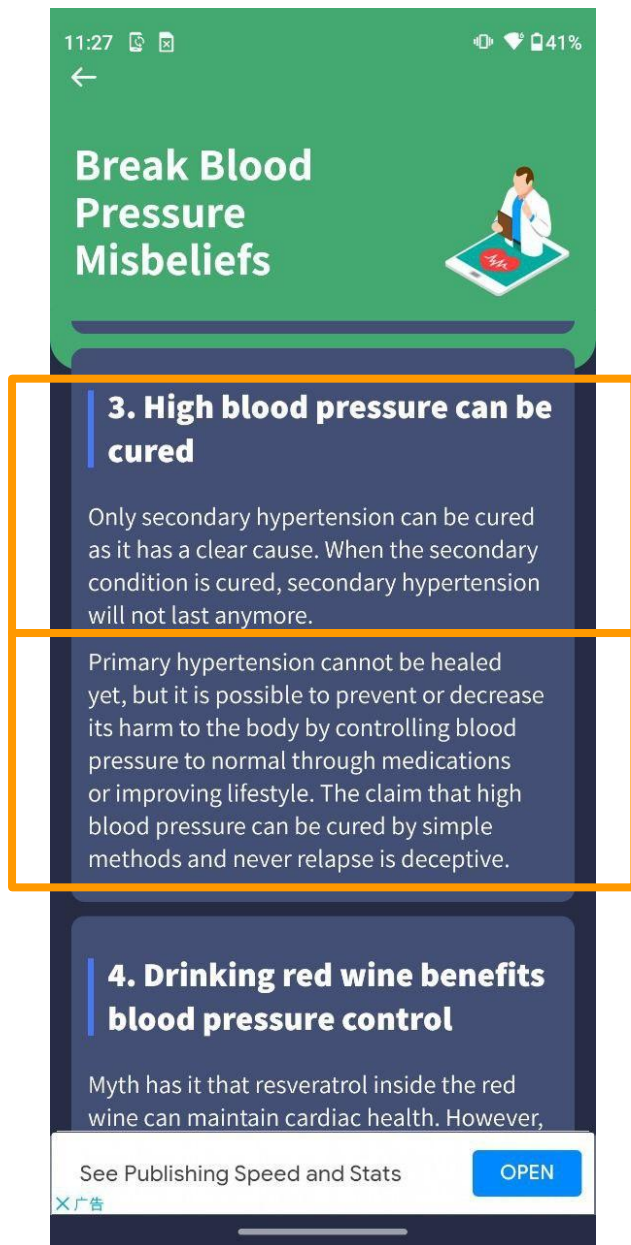




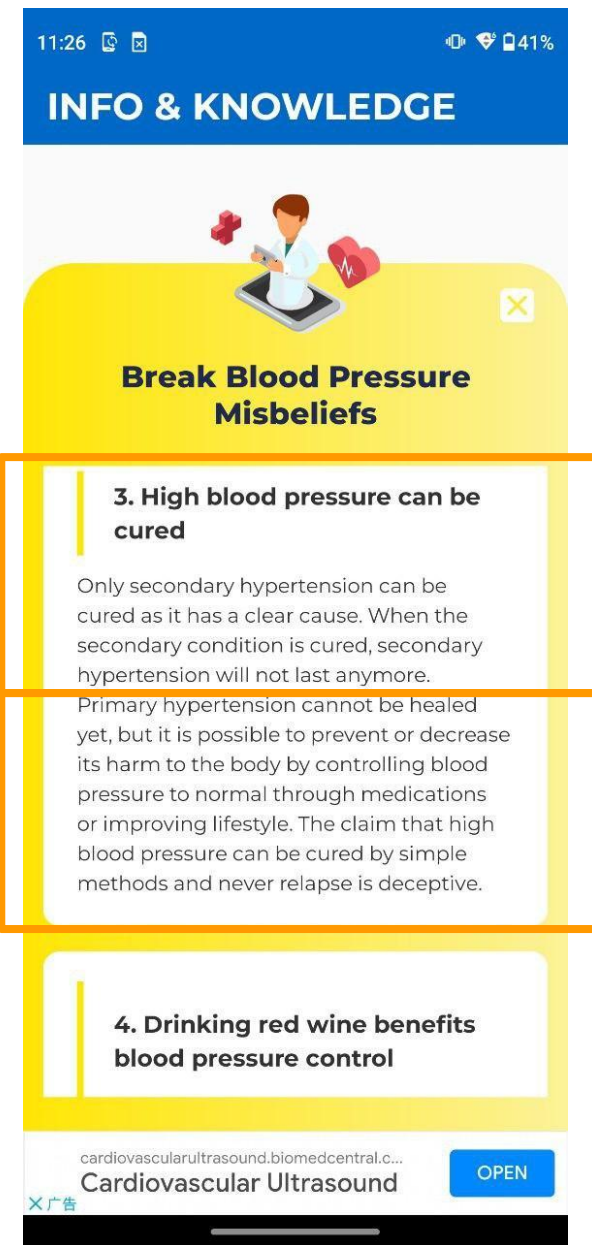
Our Copyrighted App



Allegedly Infringing App



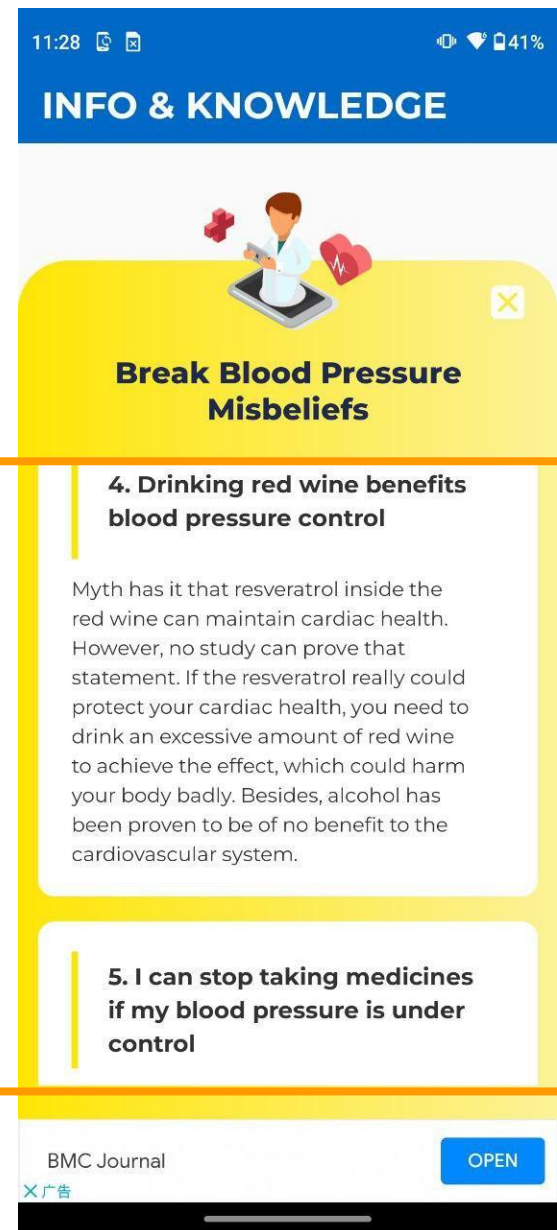
Our Copyrighted App



Allegedly Infringing App

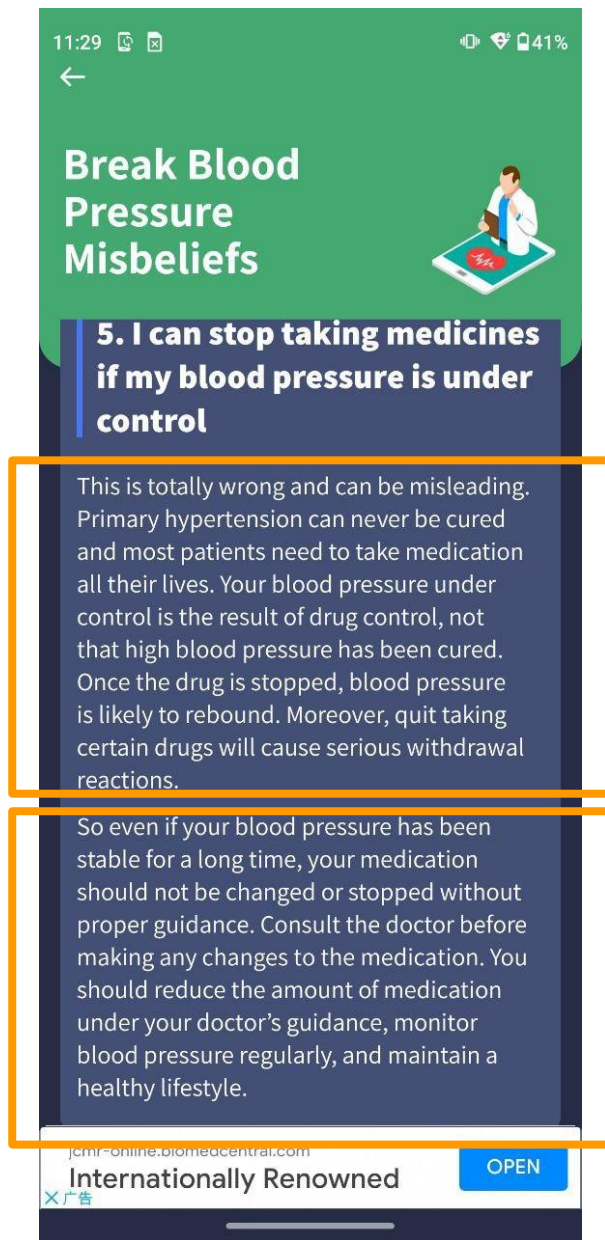


Our Copyrighted App

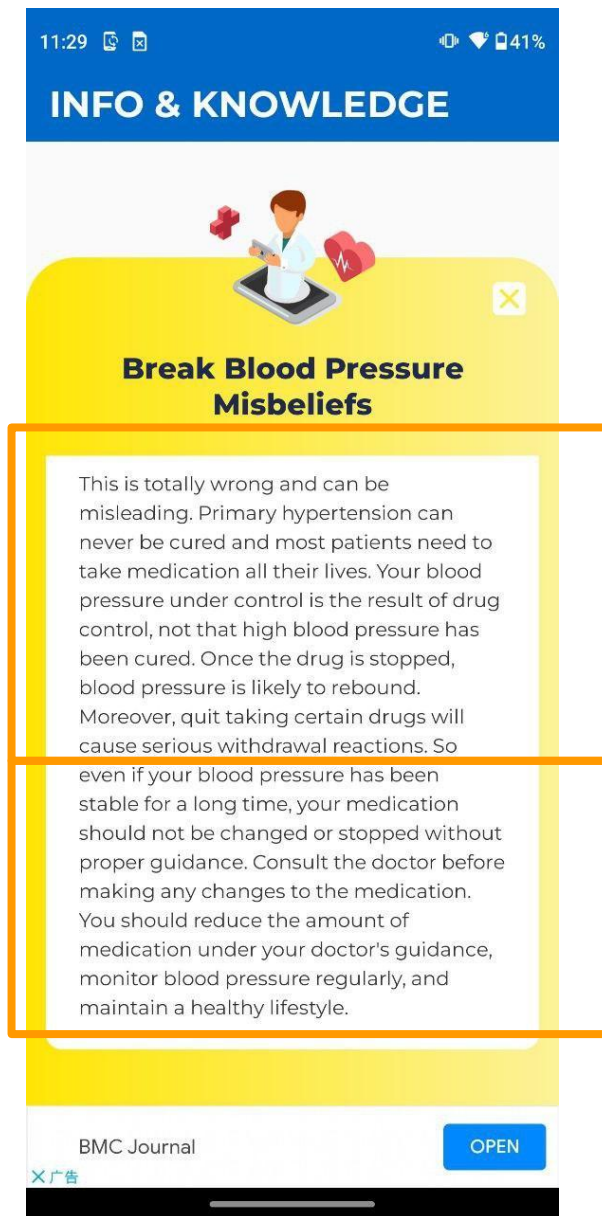


Allegedly Infringing App

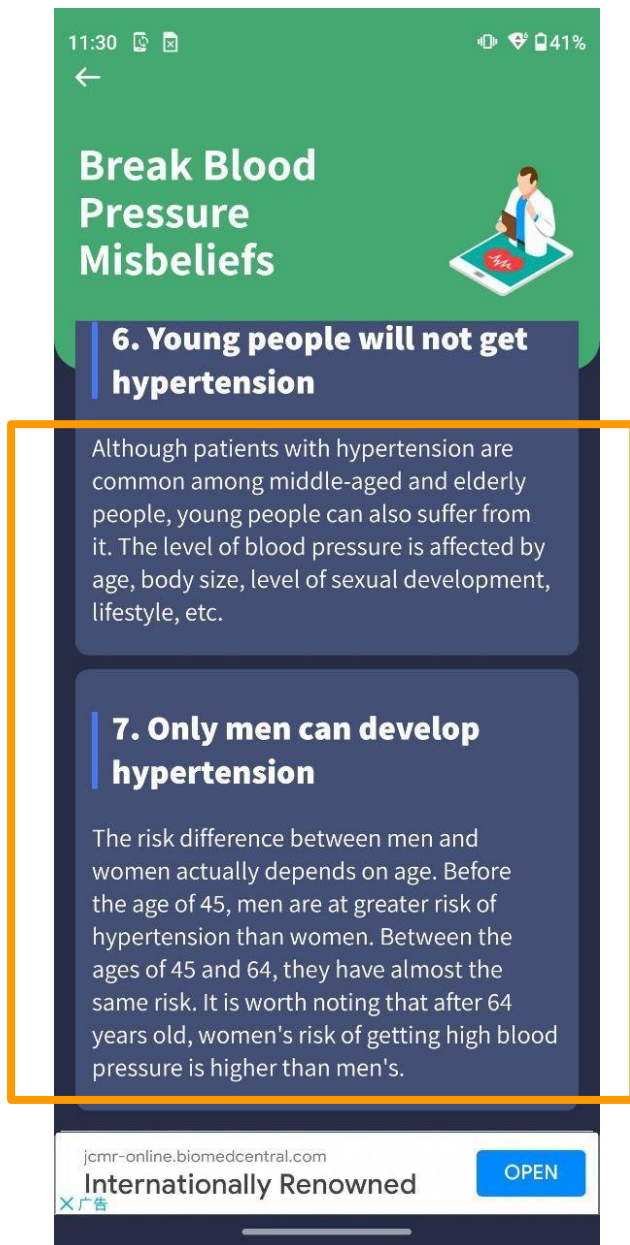




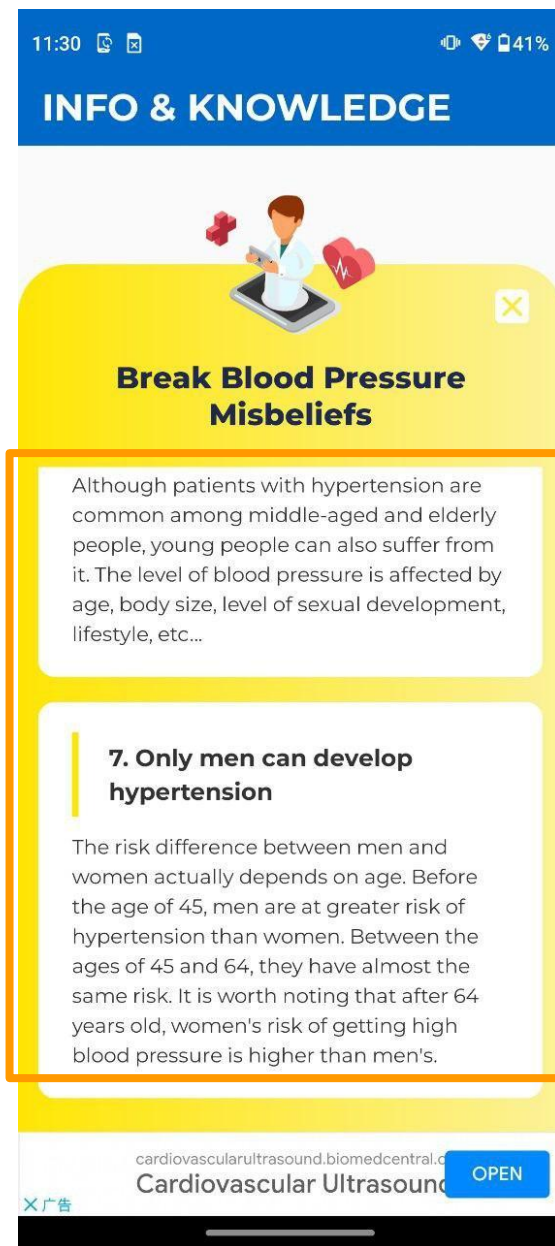
Our Copyrighted App



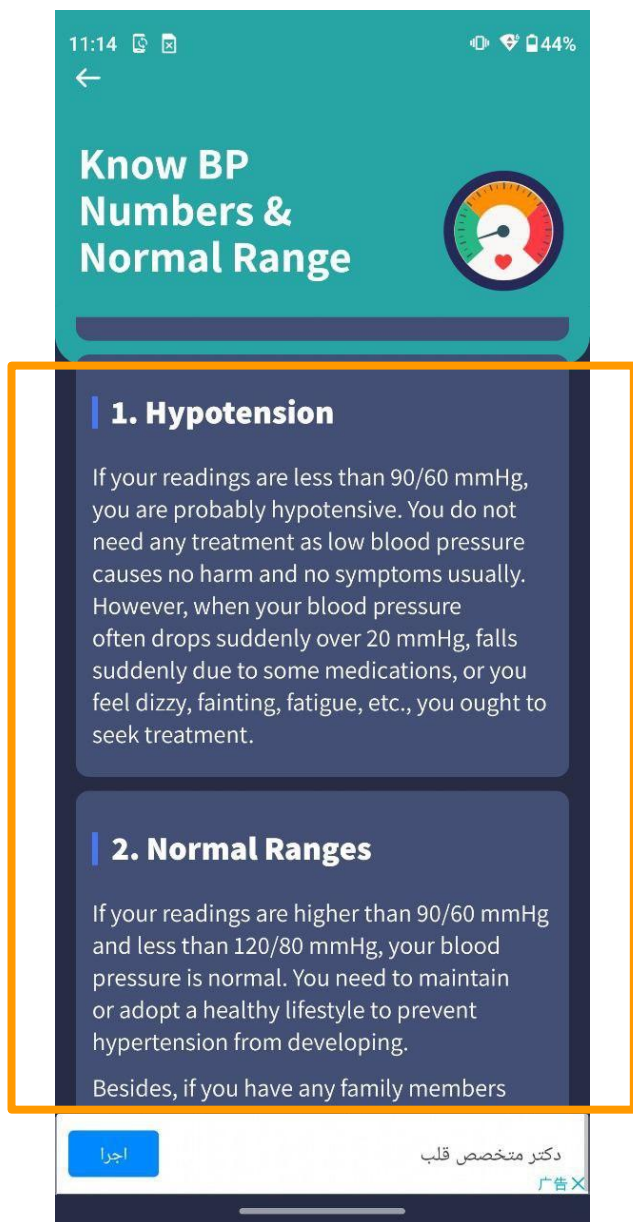
Allegedly Infringing App



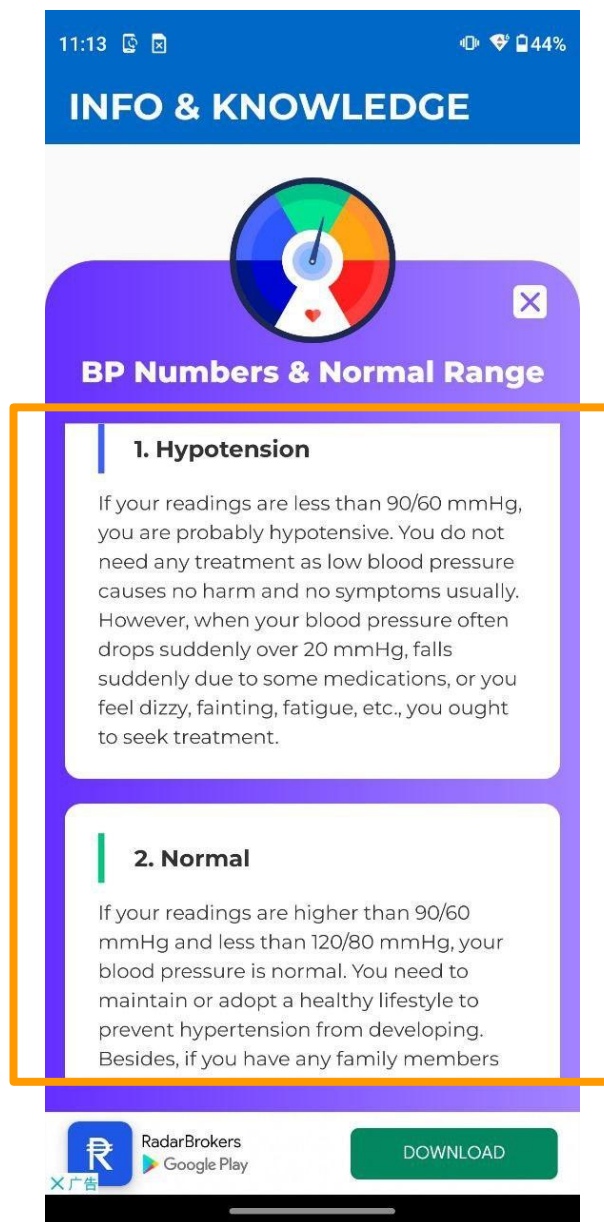
Our Copyrighted App



Allegedly Infringing App

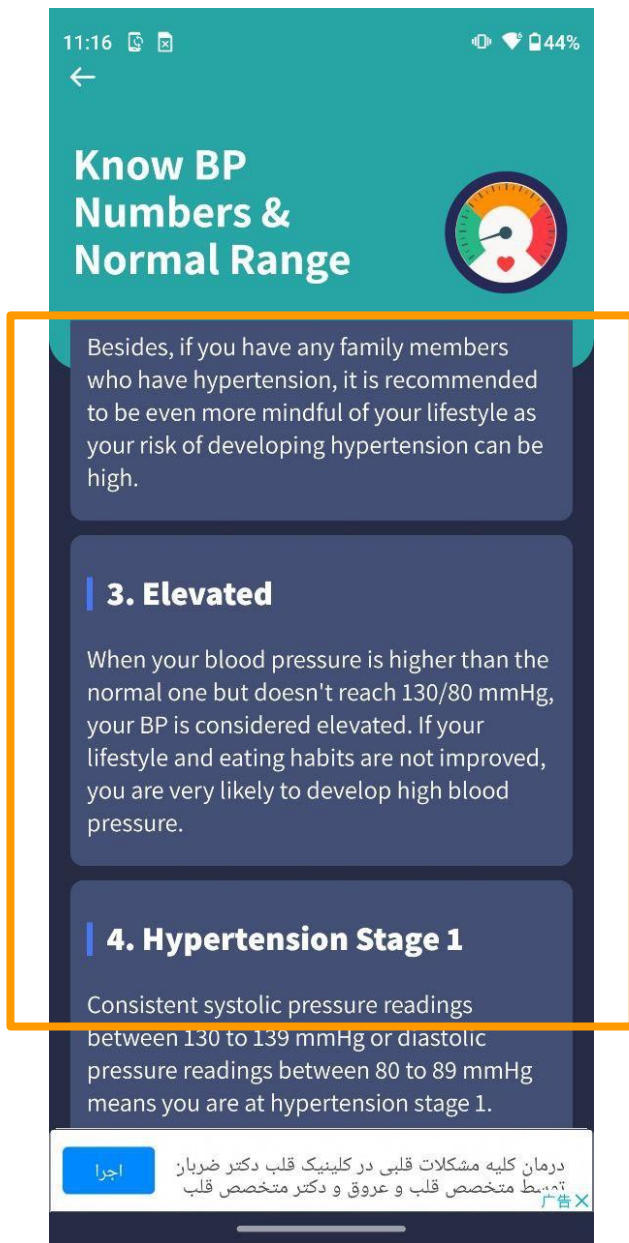


Our Copyrighted App

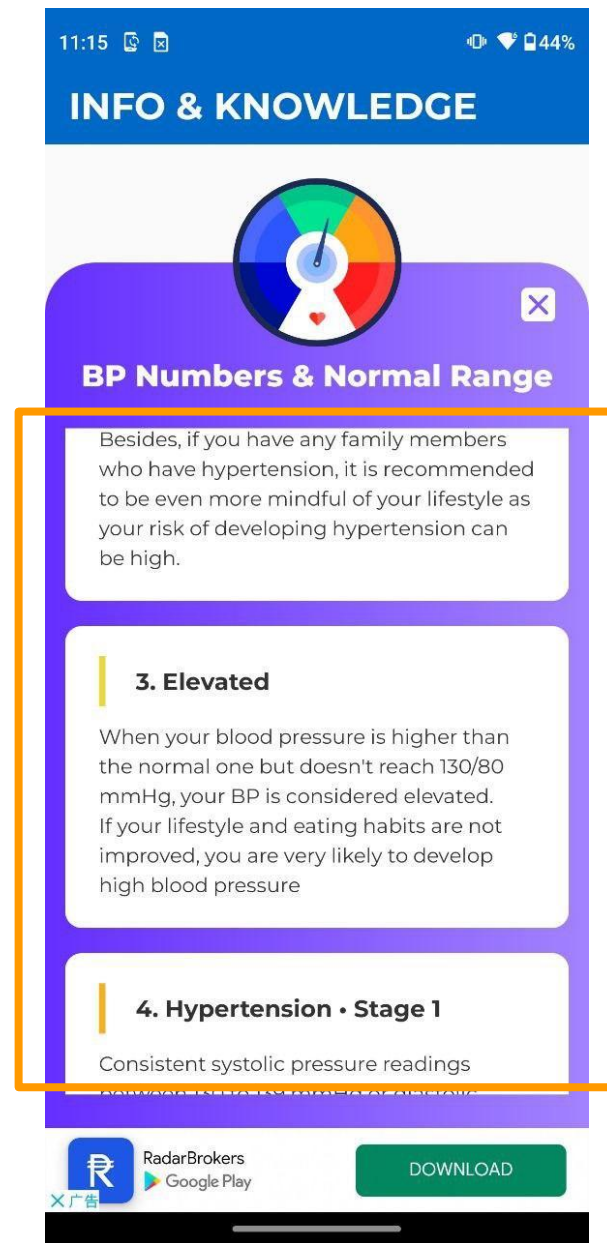


Allegedly Infringing App

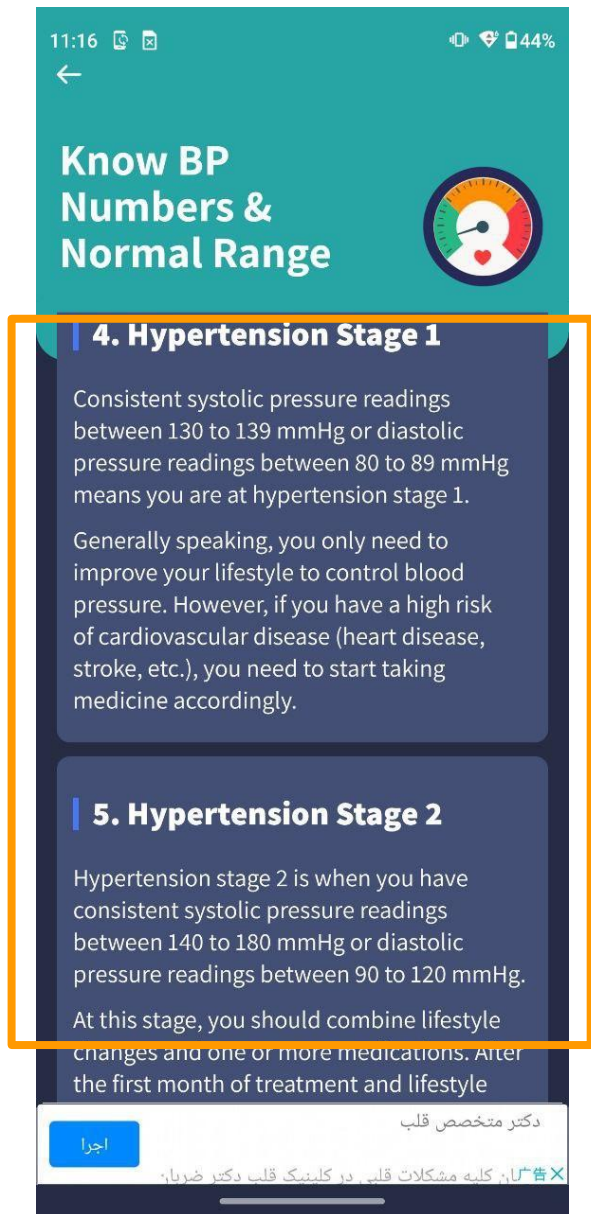




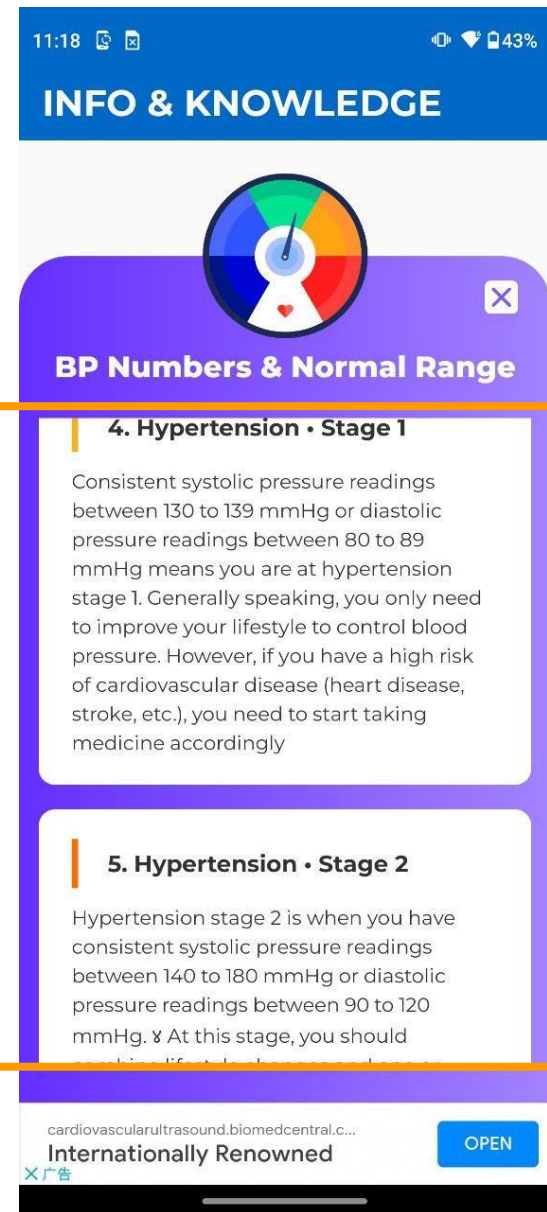
Our Copyrighted App



Allegedly Infringing App

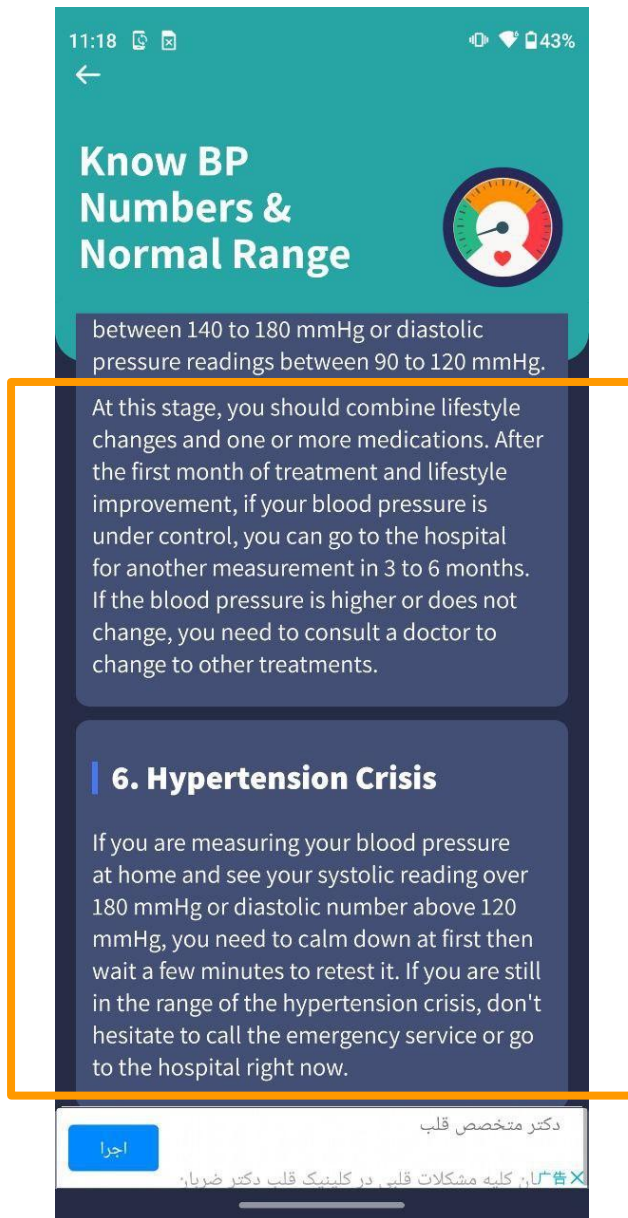


Our Copyrighted App

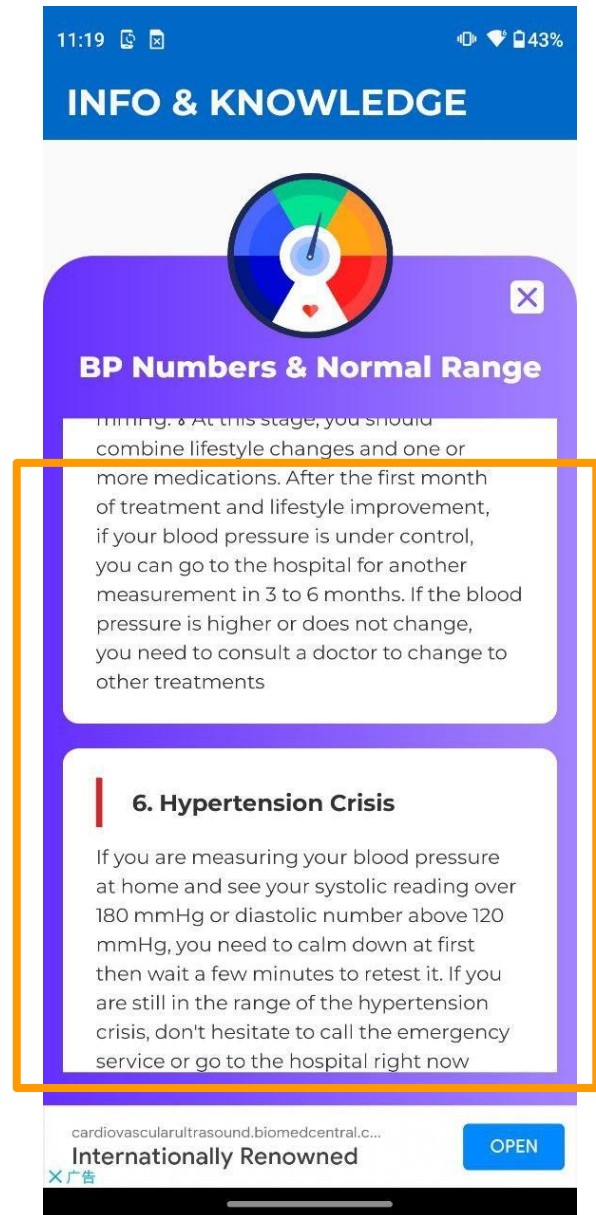


Allegedly Infringing App



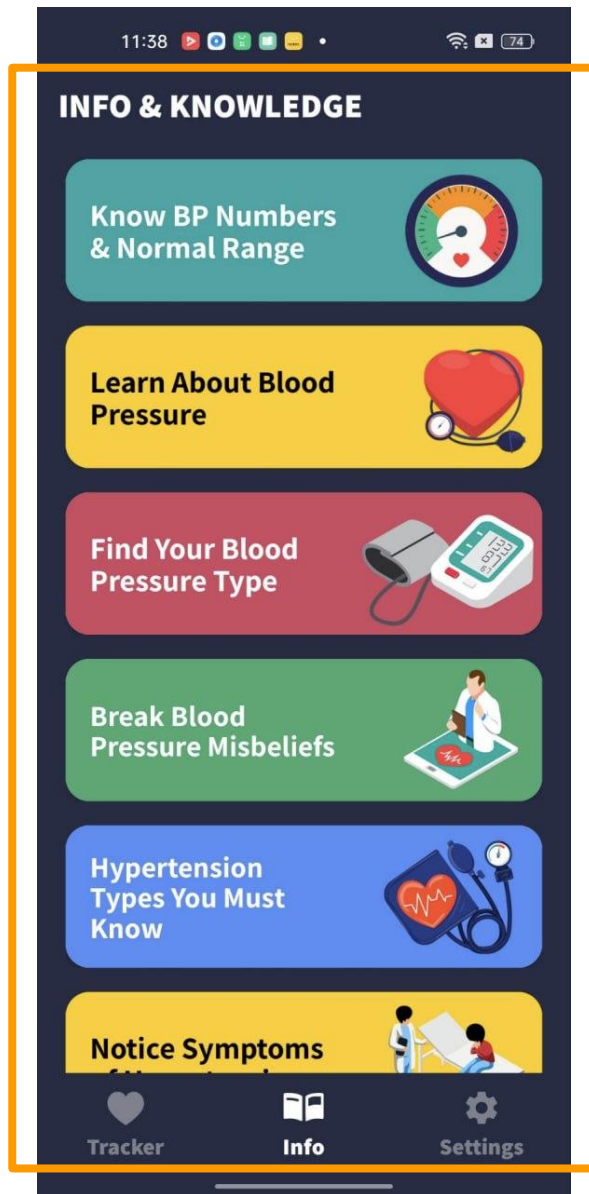


Our Copyrighted App

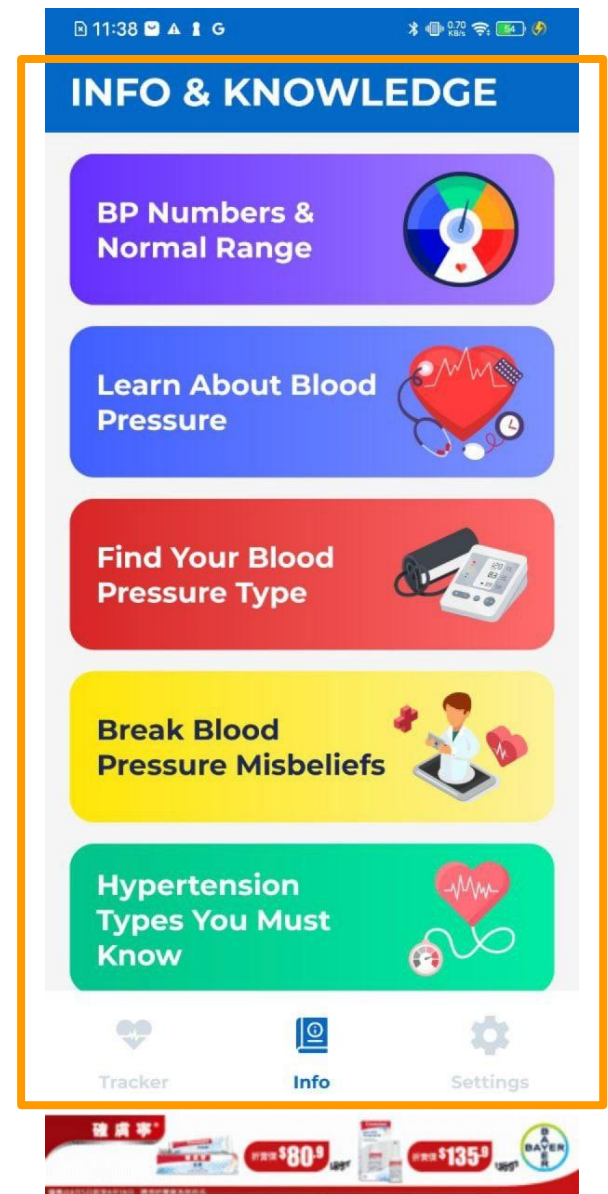


Allegedly Infringing App

# Copied our Inapp Text & UI Design



Our Copyrighted App



Allegedly Infringing App

# Our app was released **much earlier** than the infringing app



## Blood Pressure App

About this app

We promise that you will find it fast and easy to pay close attention to your blood pressure and to detect small changes brought by your lifestyle improvements.

Using the Blood Pressure App, you can grasp your BP condition fully under different states (lying, sitting, before/after meal, etc.). There is no doubt that your health will be taken care of to yield twice the result with half the effort.

You can export your BP trends to maximize your medical appointment. Our app also introduces tips and methods for your health improvements in the long term.

What's more, when you wish to know more about blood pressure, feel free to contact us and we are here by your side and ready to help.

<b>Version</b> 1.2.2	<b>Updated on</b> Jun 22, 2022
<b>Requires Android</b> 5.0 and up	<b>Downloads</b> 10,000,000+ downloads
<b>Content rating</b> Everyone <a href="#">Learn more</a>	<b>Permissions</b> <a href="#">View details</a>
<b>Released on</b> Nov 17, 2021	<b>Offered by</b> QR Code Scanner.



## Blood Pressure Tracker

Health & Fitness (Applications) | [Open in Google Play](#)

conclusions about the user's blood pressure zone. The blood pressure journal in the diary is very flexible in terms of time, depending on the needs of the user.

### ★ MAIN FUNCTIONS OF BLOOD PRESSURE TRACKER APP ★

- ★ **Record blood pressure status daily**  
- The application allows users to fill in blood pressure information according to 3 values: Systolic (systolic blood pressure readings), Diastolic (diastolic blood pressure readings) and Pulse (bp heart rate measurements) with just 1 touch. In a few seconds, the indicators will be automatically updated on the blood pressure app, after calculating and analyzing, the app will give the last result.  
- After filling in, data for each day will be shown by a column with a color corresponding to the blood pressure zone it belongs to. You can completely edit or update the entered indicators in the blood pressure diary.

- ★ **Determine blood pressure zones**  
The bp zone includes 6 zones, after collecting numbers from the blood pressure tracker you can know whether you have a normal blood pressure level or an unsafe level (high blood pressure/ low blood pressure).

- ★ **Track BP, edit data in blood pressure journal**

## Screenshots



## Versions

2022.07.24 Current release Jul 24,

[See More](#)

## About

**Initial Release Date:** Jul 24, 2022  
**Last Updated Time:** Aug 10, 2022  
**Version:** 2022.07.24  
**Content Rating:** Rated for 3+

**Data Resource URL**

**Our Copyrighted App**

**Allegedly Infringing App**

# **EXHIBIT B**

: David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>

: 2022 年 8 月 30 日 2:35

: [Trustedapp.help@gmail.com](mailto:Trustedapp.help@gmail.com) <[Trustedapp.help@gmail.com](mailto:Trustedapp.help@gmail.com)>

: [TM@bayramoglu-legal.com](mailto:TM@bayramoglu-legal.com) <[tm@bayramoglu-legal.com](mailto:tm@bayramoglu-legal.com)>; [candy@bayramoglu-legal.com](mailto:candy@bayramoglu-legal.com) <[candy@bayramoglu-legal.com](mailto:candy@bayramoglu-legal.com)>

: Re: Copyright Infringement by Apero Technologies Group - TrustedApp (Blood Pressure Tracker)

Dear Apero Technologies Group,

As I received a notification that your [hr@apero.vn](mailto:hr@apero.vn) email obtained from your website is invalid, I am sending the email again solely to the email provided on your developer page. I have also edited the time to respond due to remedy a clerical error.

I am reaching out to you on behalf of our client, JIAO MINGYANG, who is the owner of a mobile application for tracking blood pressure. Your mobile application "Blood Pressure Tracker" explicitly and directly copies the exact text from our client's mobile application, clearly infringing on our client's copyright. Please see the attached examples of the directly copies text.

Our client's mobile application has priority as it was developed and released prior to your mobile application. You had full access to our client's mobile application and it is clear that you went through and copied the internal text for your own financial benefit.

Therefore, we must request that the text be changed so as to not infringe on our client's copyright. Please confirm that the changes will be made no later than **September 2, 2022**.

Please note that silence will be viewed as a refusal to cooperate and a willful infringement of our client's intellectual property rights.

Sincerely,  
David Silver

DAVID  
SILVER  
Attorney-at-Law

Admissions: California & Nevada

1540 West Warm Springs Road, Suite 100,  
Henderson, NV 89014  
(702) 462-5973  
[www.bayramoglu-legal.com](http://www.bayramoglu-legal.com)

  
Bayramoglu Law

EVERY PERSON WHO  
WALKS THROUGH  
OUR DOOR IS  
IMPORTANT TO US

---

**From:** David Silver

**Sent:** Monday, August 29, 2022 11:30 AM

**To:** [Trustedapp.help@gmail.com](mailto:Trustedapp.help@gmail.com) <[Trustedapp.help@gmail.com](mailto:Trustedapp.help@gmail.com)>; [hr@apero.vn](mailto:hr@apero.vn) <[hr@apero.vn](mailto:hr@apero.vn)>

**Cc:** [TM@bayramoglu-legal.com](mailto:TM@bayramoglu-legal.com) <[tm@bayramoglu-legal.com](mailto:tm@bayramoglu-legal.com)>; [candy@bayramoglu-legal.com](mailto:candy@bayramoglu-legal.com) <[candy@bayramoglu-legal.com](mailto:candy@bayramoglu-legal.com)>

**Subject:** Copyright Infringement by Apero Technologies Group - TrustedApp (Blood Pressure Tracker)

Dear Apero Technologies Group,

I am reaching out to you on behalf of our client, JIAO MINGYANG, who is the owner of a mobile application for tracking blood pressure. Your mobile application "Blood Pressure Tracker" explicitly and directly copies the exact text from our client's mobile application, clearly infringing on our client's copyright. Please see the attached examples of the directly copies text.

Our client's mobile application has priority as it was developed and released prior to your mobile application. You had full access to our client's mobile application and it is clear that you went through and copied the internal text for your own financial benefit.

Therefore, we must request that the text be changed so as to not infringe on our client's copyright. Please confirm that the changes will be made no later than **September 2, 2022**.

Please note that silence will be viewed as a refusal to cooperate and a willful infringement of our client's intellectual property rights.

Sincerely,  
David Silver

DAVID  
SILVER  
Attorney-at-Law

Admissions: California & Nevada

1540 West Warm Springs Road, Suite 100,  
Henderson, NV 89014  
(702) 462-5973  
[www.bayramoglu-legal.com](http://www.bayramoglu-legal.com)

  
Bayramoglu Law

EVERY PERSON WHO  
WALKS THROUGH  
OUR DOOR IS  
IMPORTANT TO US

# EXHIBIT C



----- orwarded message -----

**From:** [removals@google.com](mailto:removals@google.com) <[removals@google.com](mailto:removals@google.com)>

**Sent:** Tuesday, October 18, 2022 11:13 AM

**To:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>

**Subject:** Your Request to Google 9-1815000033310

Hi,

Thanks for reaching out to us.

We have received your legal request. Please note that Google will only email you about this notice if we need additional clarification. If we process and remove all of the identified content from the URLs you provided and do not receive a counternotice, you will not receive any further e-mails about it from Google.

Regards,

The Google Team

## Report alleged copyright infringement

Country of residence

United States

Full legal name

David Silver

Company name

Bayramoglu Law Offices LLC

Full legal name of the copyright holder you represent

JIAO MINGYANG

Contact email address

[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)

Identify and describe the copyrighted work

We had filed a previous DMCA Takedown Request for this application, and Google claimed it could not find the infringing material and requested additional evidence. When we provided the additional evidence, Google said it



would not consider additional evidence and required us to submit a new DMCA Takedown Request. Google then proceeded to ignore all of our later [correspondence](#). So here we are filing a second DMCA Takedown Request as there are still multiple text and user interface layout that infringes on our client's copyrights, which can be seen in the supplemental material attached. Please take the appropriate action in accordance with the DMCA.

Where can we see an authorized example of the work?

<https://play.google.com/store/apps/details?id=bloodpressure.bloodpressureapp.bloodpressuretracker>

Allegedly infringing URLs

<https://play.google.com/store/apps/details?id=com.bloodpressurechecker.bpmonitor.bptracker>

Attach a screenshot of the allegedly infringing material

Supplementary Material.pdf

I have a good faith belief that use of the copyrighted materials described above as allegedly infringing is not authorized by the copyright owner, its agent, or the law.

**Please check to confirm**

The information in this notification is accurate and I swear, under penalty of perjury, that I am the copyright owner or am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

**Please check to confirm**

I understand that a copy of the notice may be sent to the developer of the affected content.

**Please check to confirm**

Signature

David Silver

# Supplementary Materials of Complaint

**Our Product:** <https://play.google.com/store/apps/details?id=bloodpressure.bloodpressureapp.bloodpressuretracker&gl=us>

## Blood Pressure App

QR Code Scanner.

Contains ads

4.6★

149K reviews

10M+

Downloads

E

Everyone ⓘ

Install



Add to wishlist



**Infringing App:** <https://play.google.com/store/apps/details?id=com.bloodpressurechecker.bpmonitor.bptracker&gl=us>

## Blood Pressure Tracker

Apero Technologies Group - TrustedApp

Contains ads

1K+

Downloads

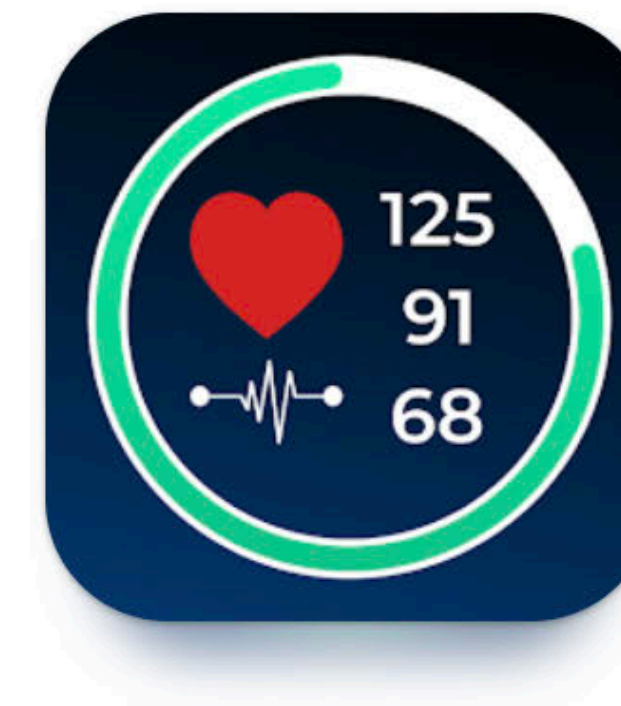
E

Everyone ⓘ

Install

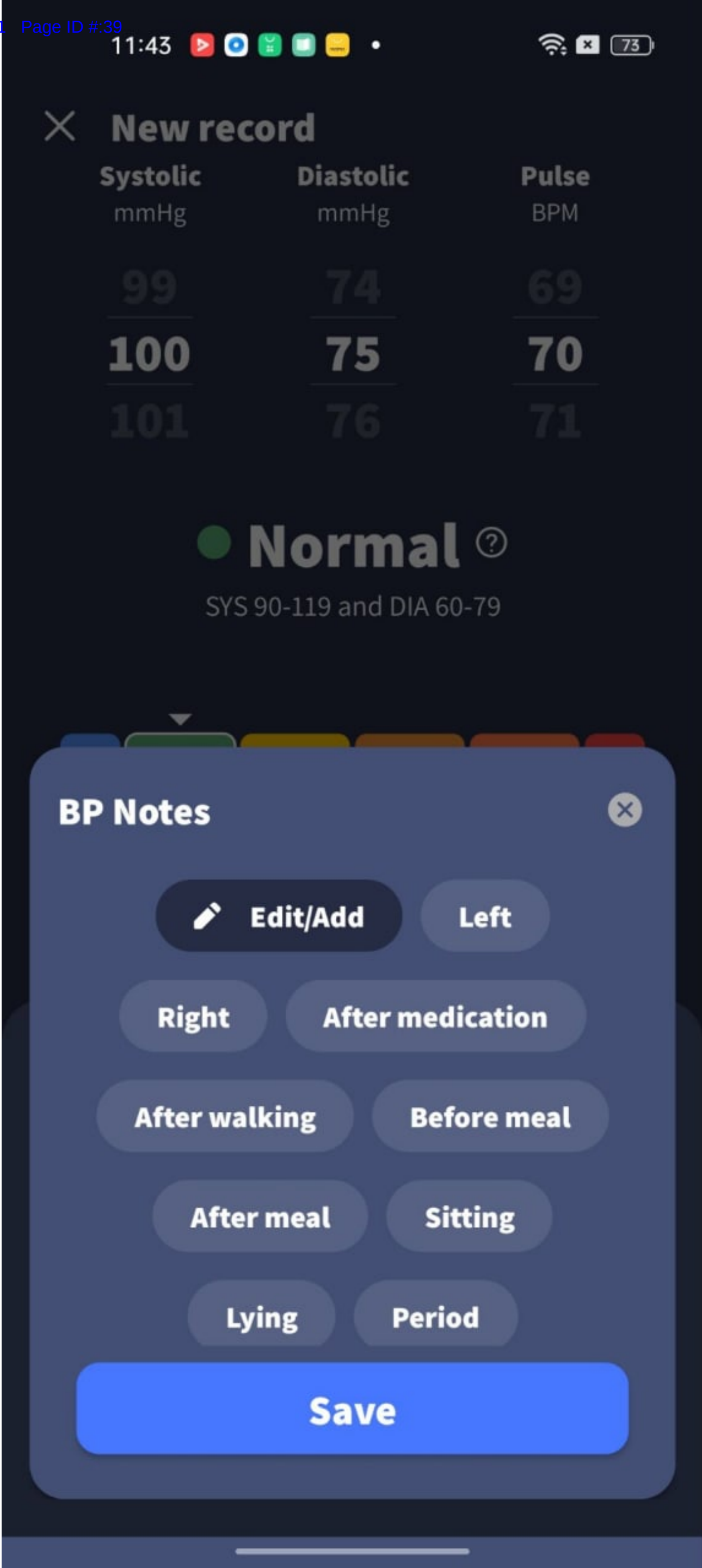
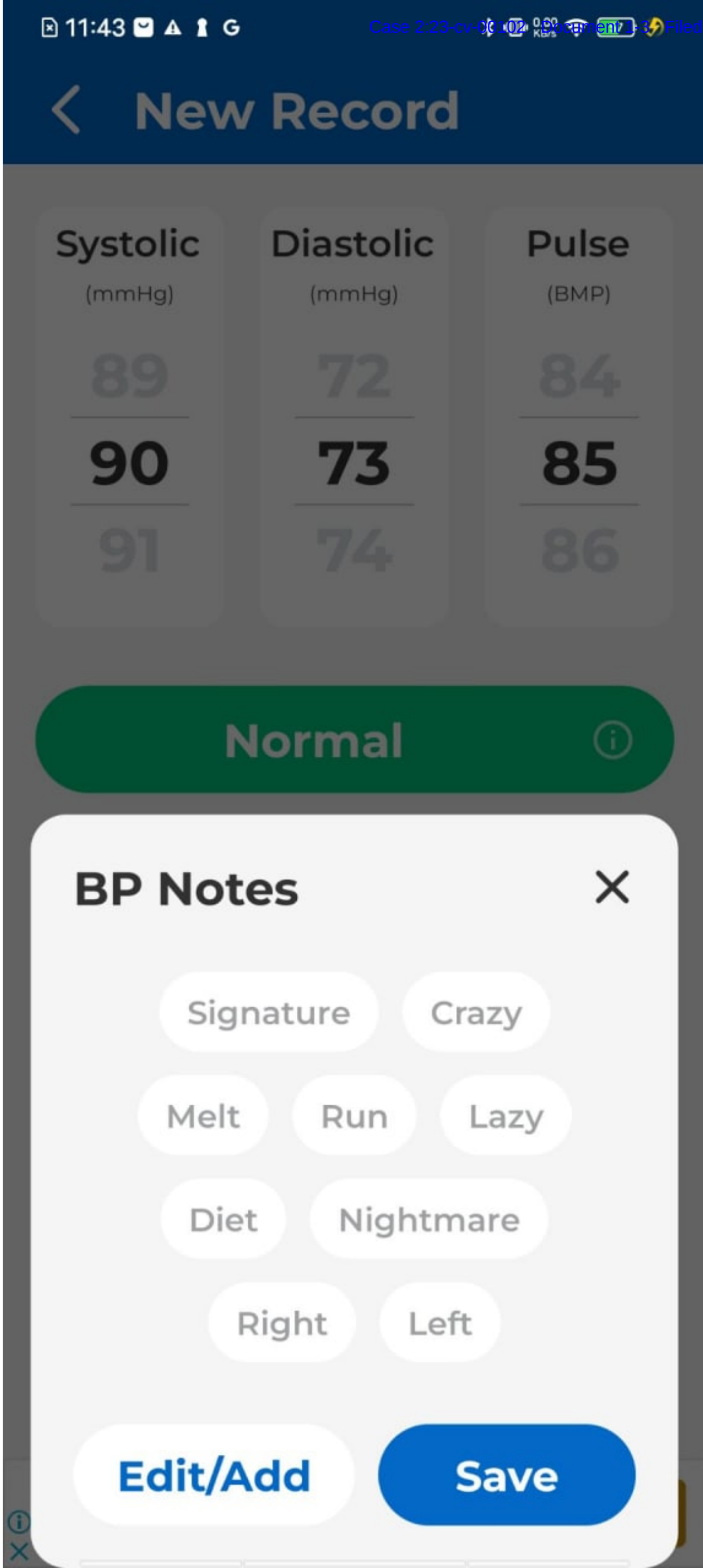


Add to wishlist



Note页面

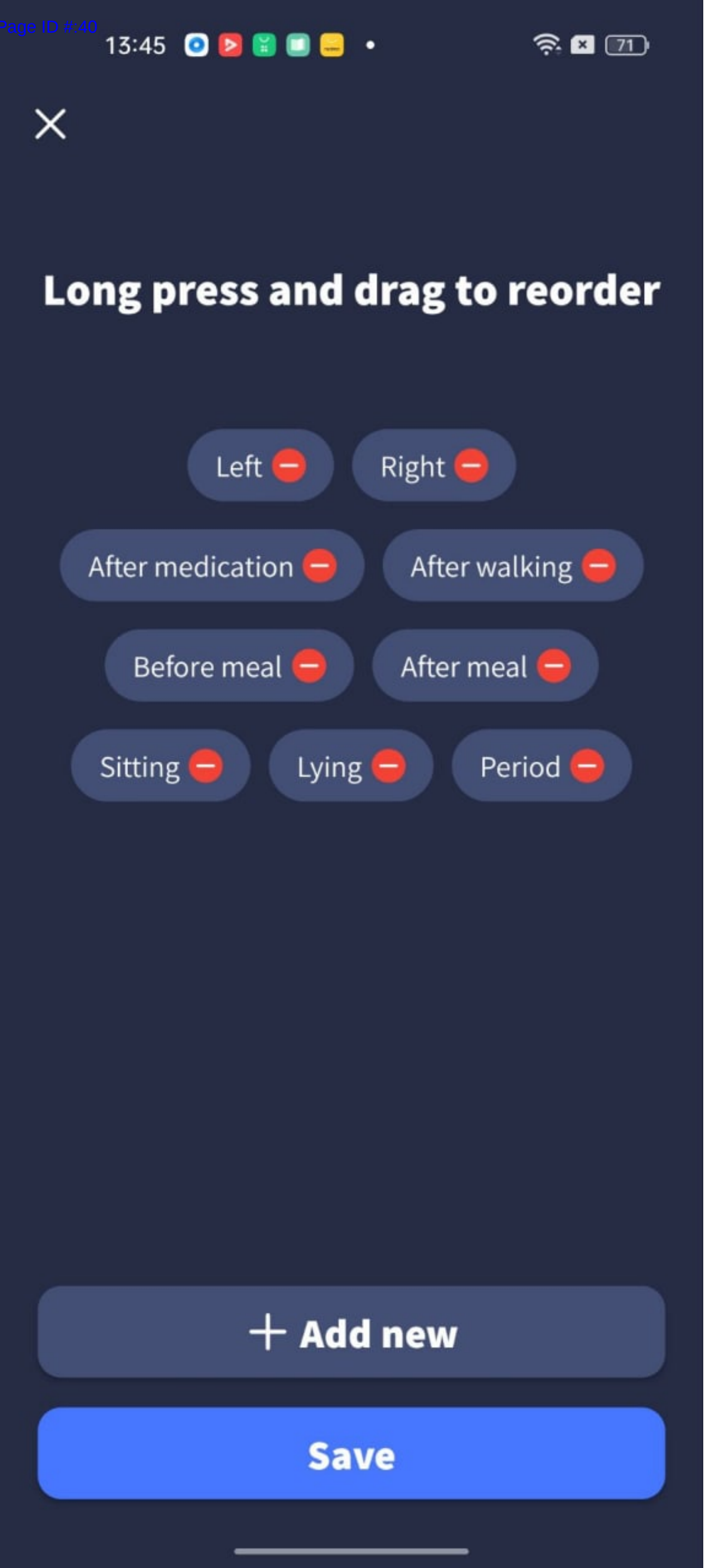
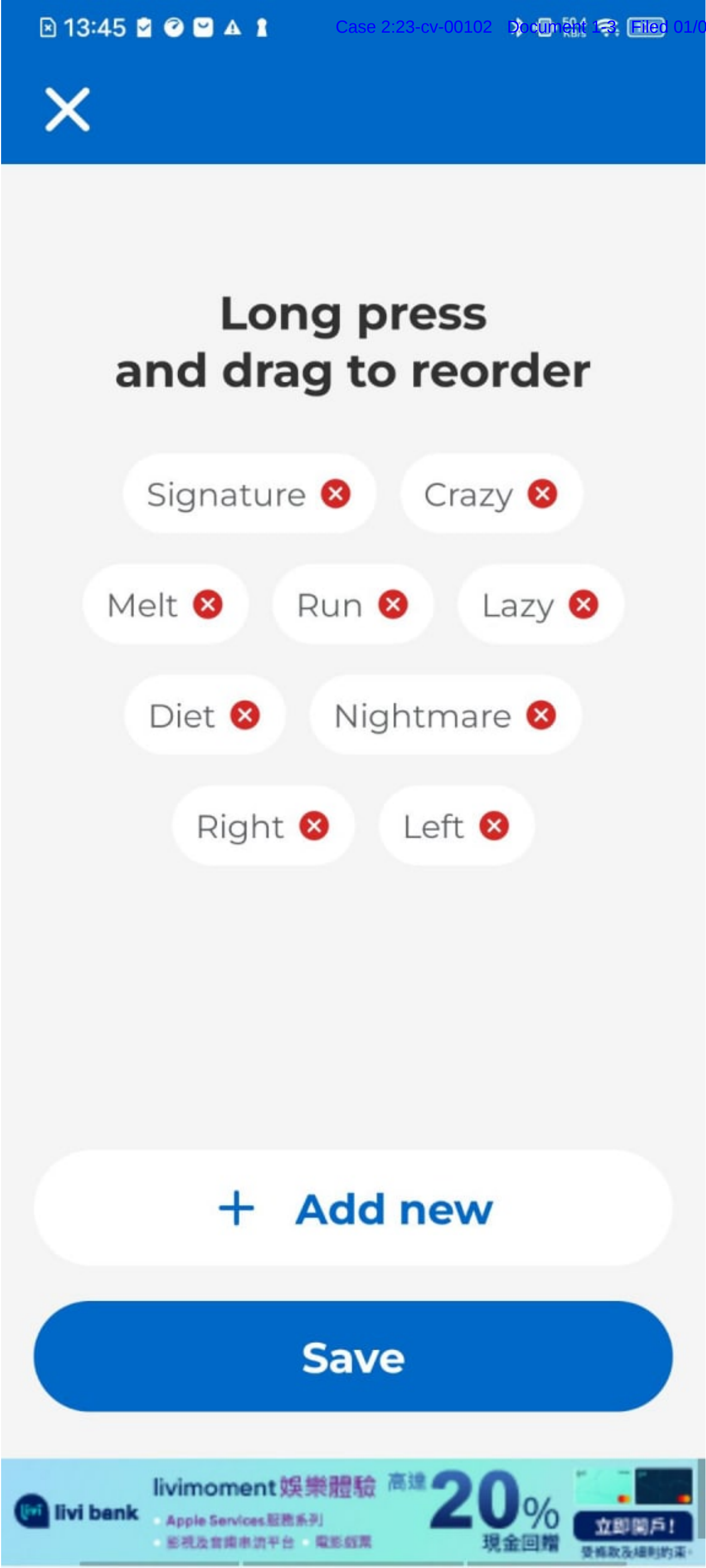
弹窗的卡片排版居中效果一致



左抄袭右我们

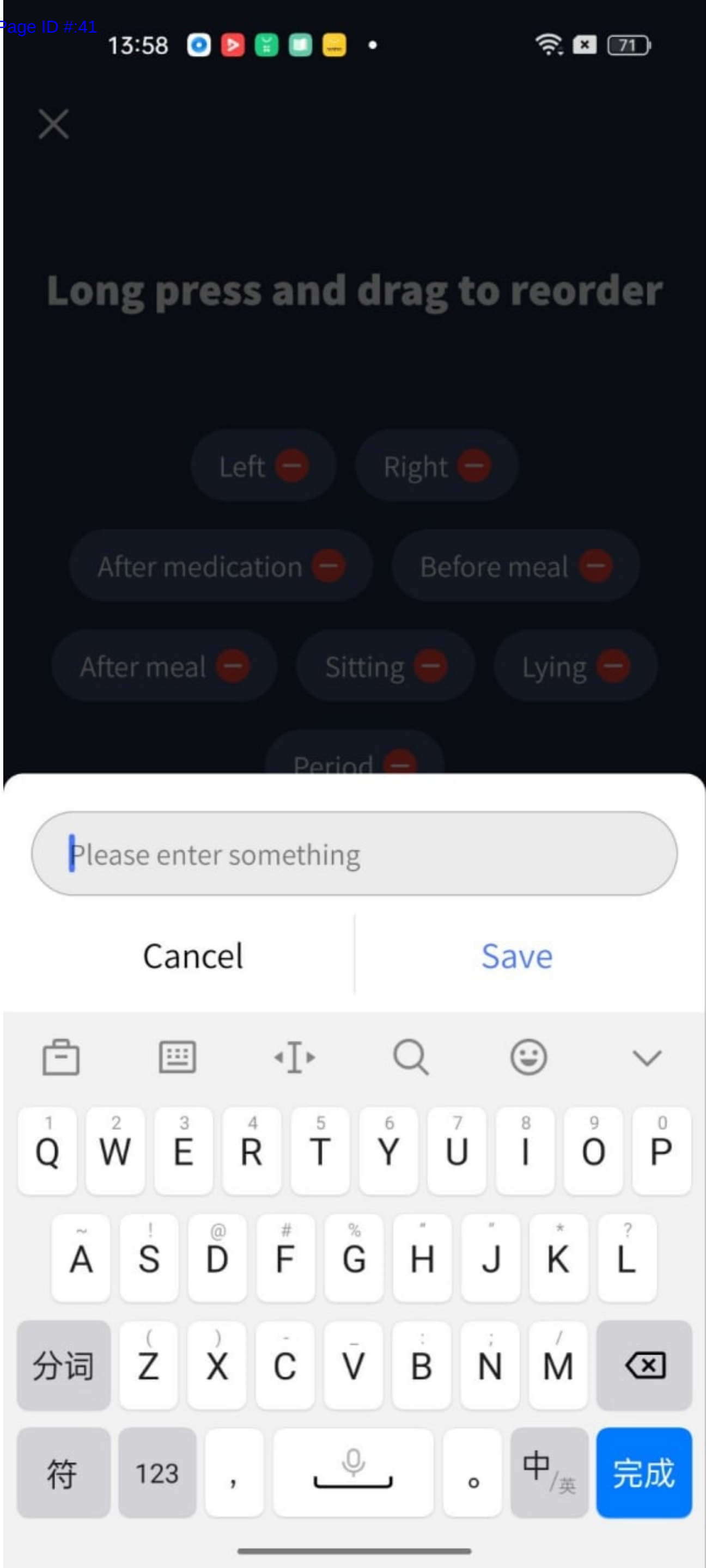
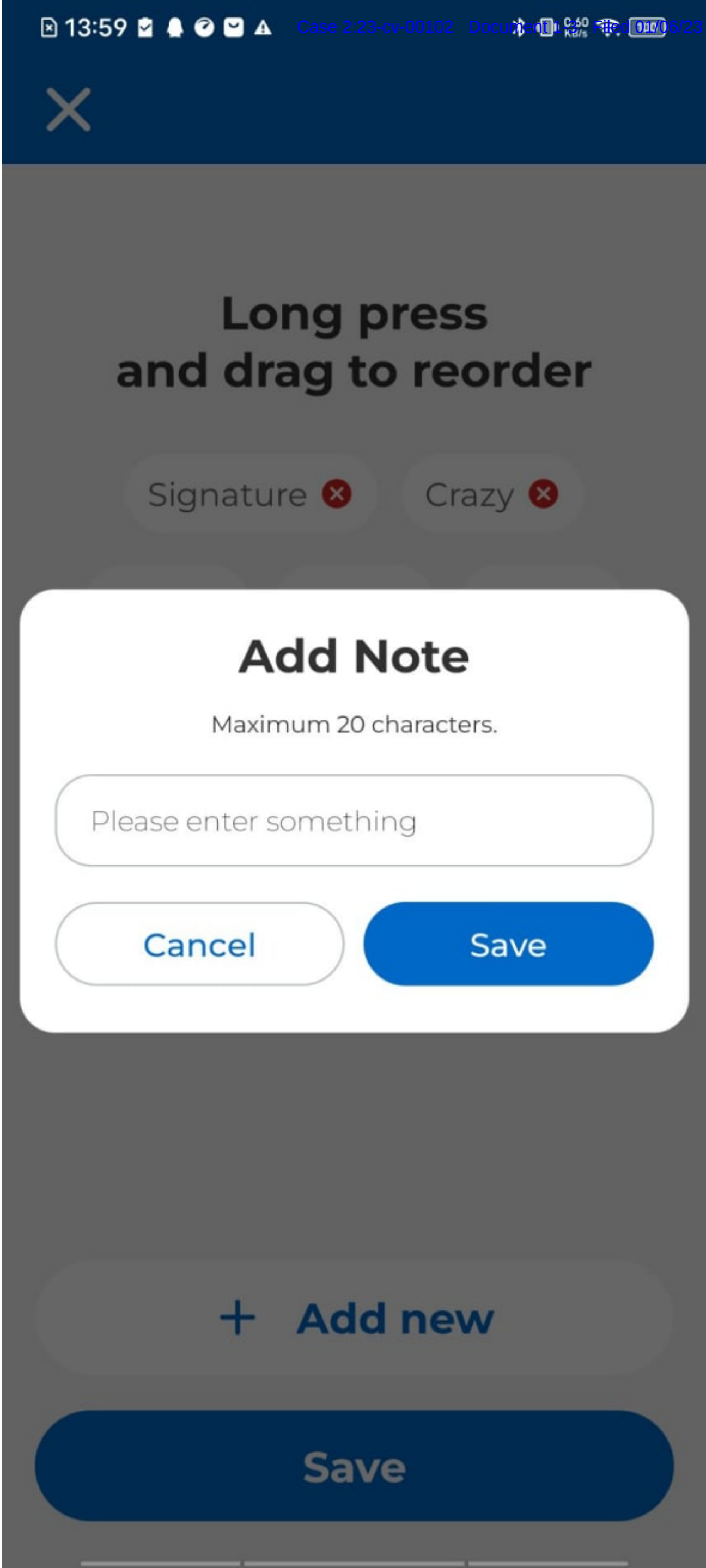


Edit note页面  
排版一致



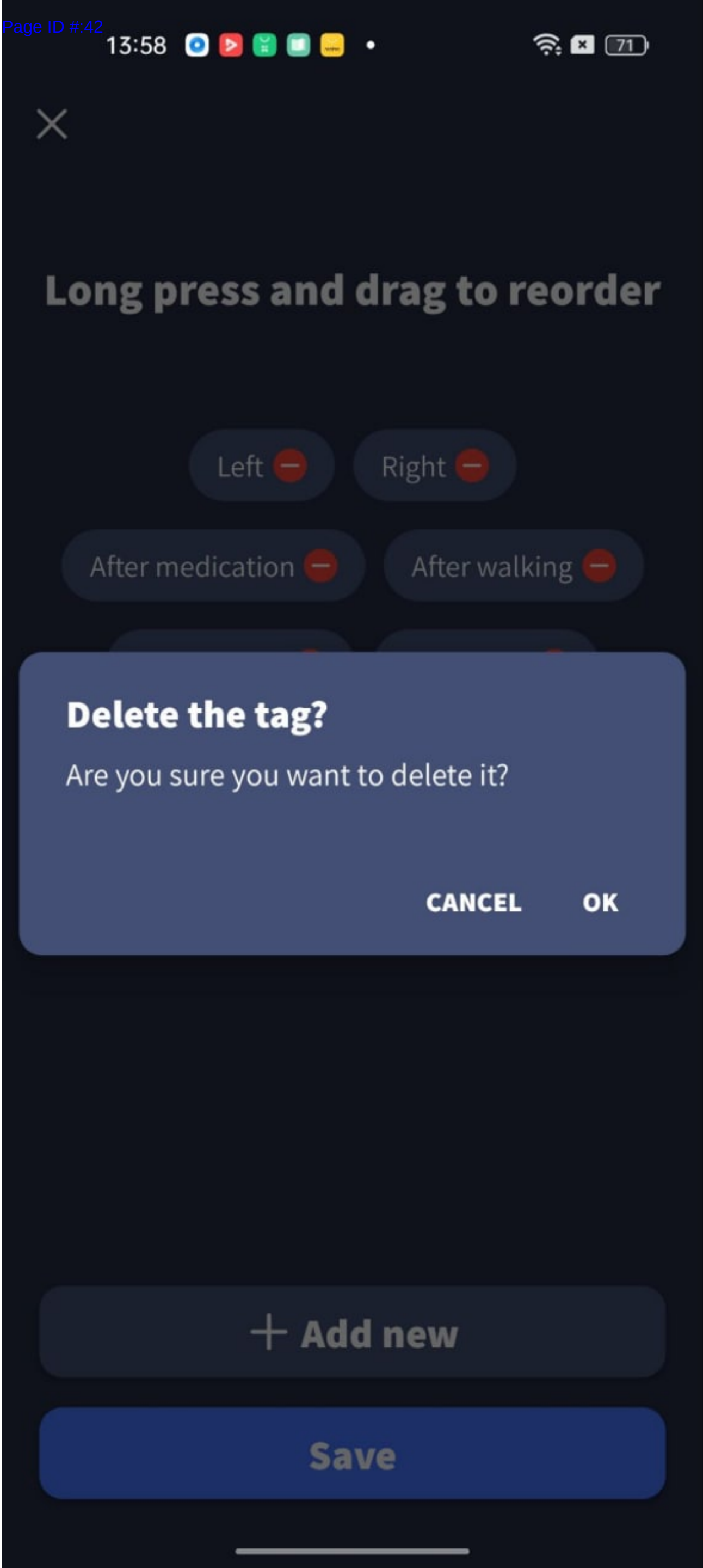
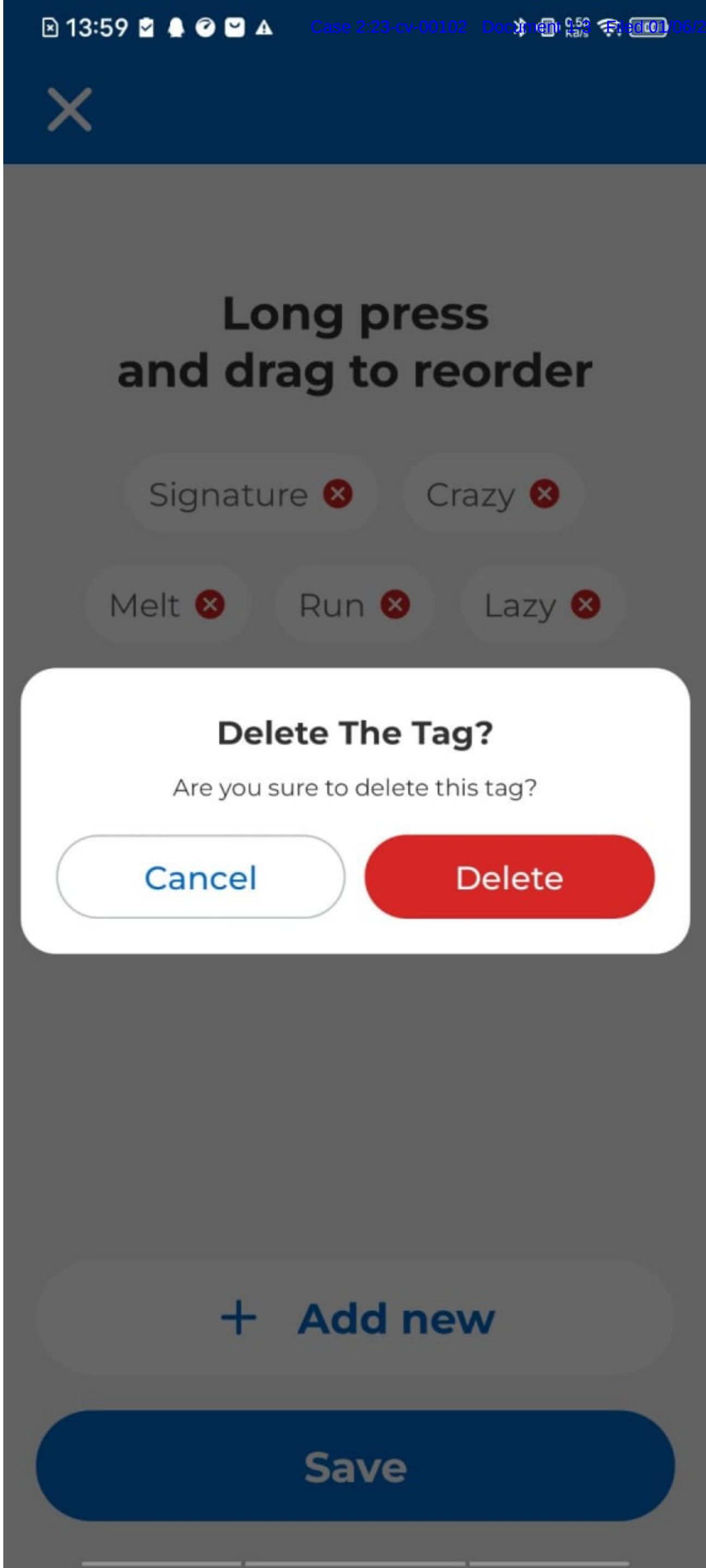
左抄袭右我们

输入内容文案一致



左抄袭右我们

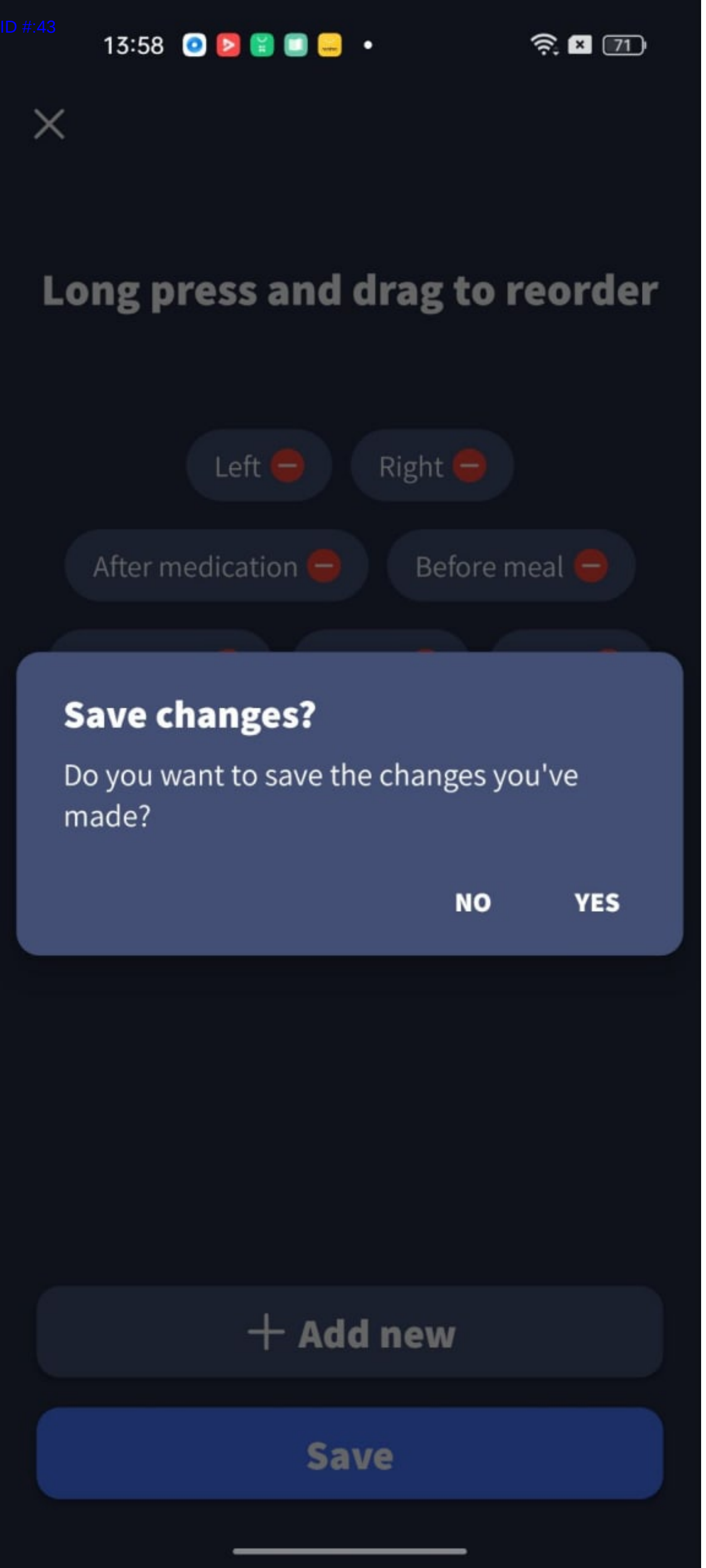
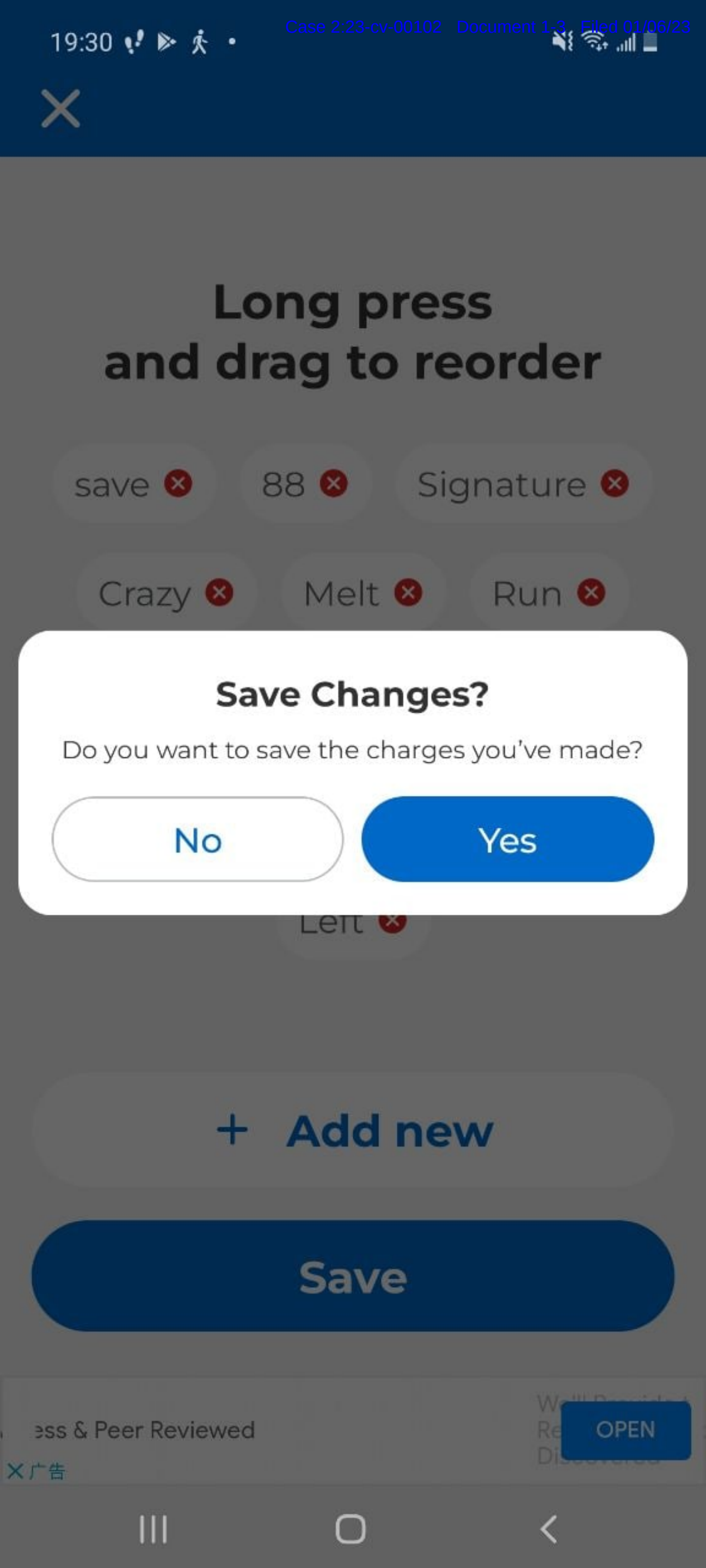
删除标签弹窗文案相似



左抄袭右我们

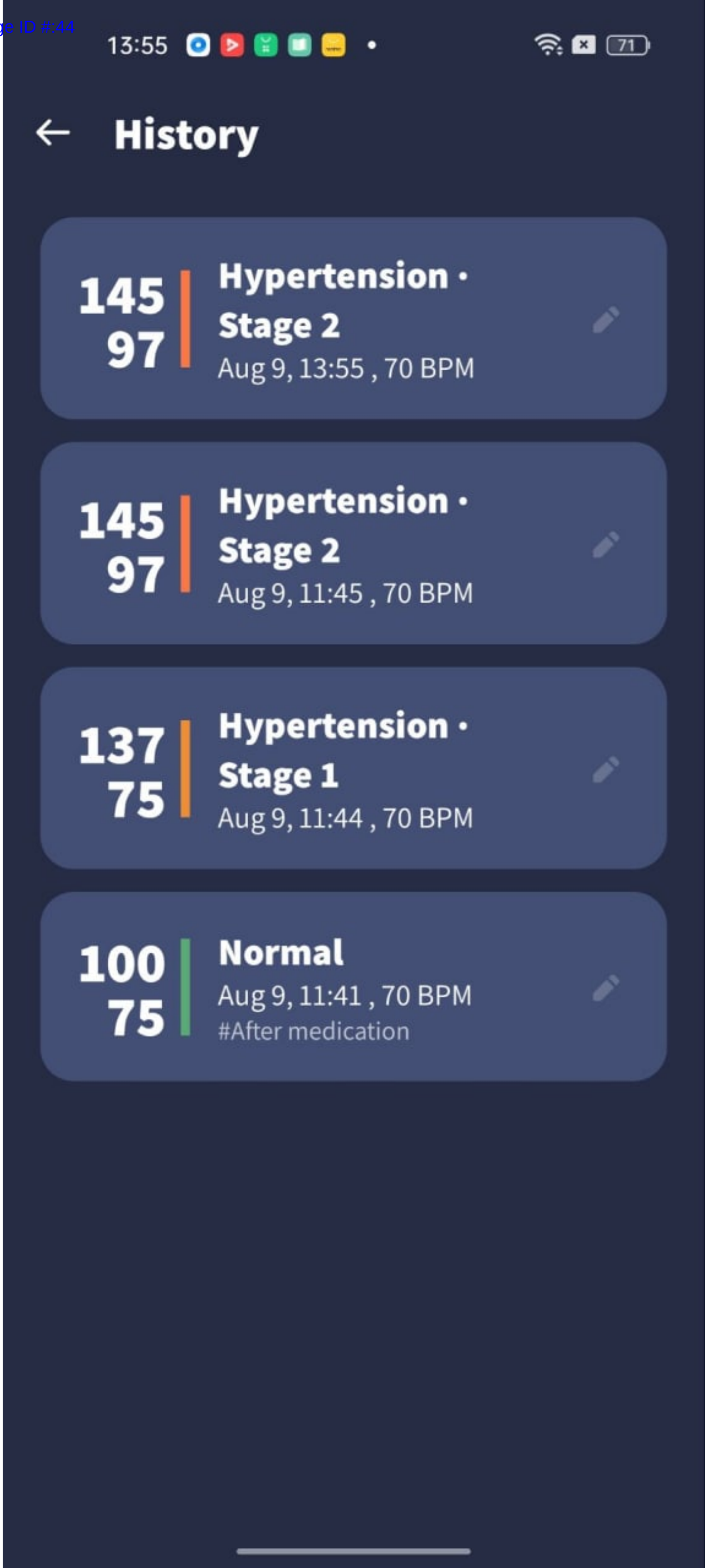
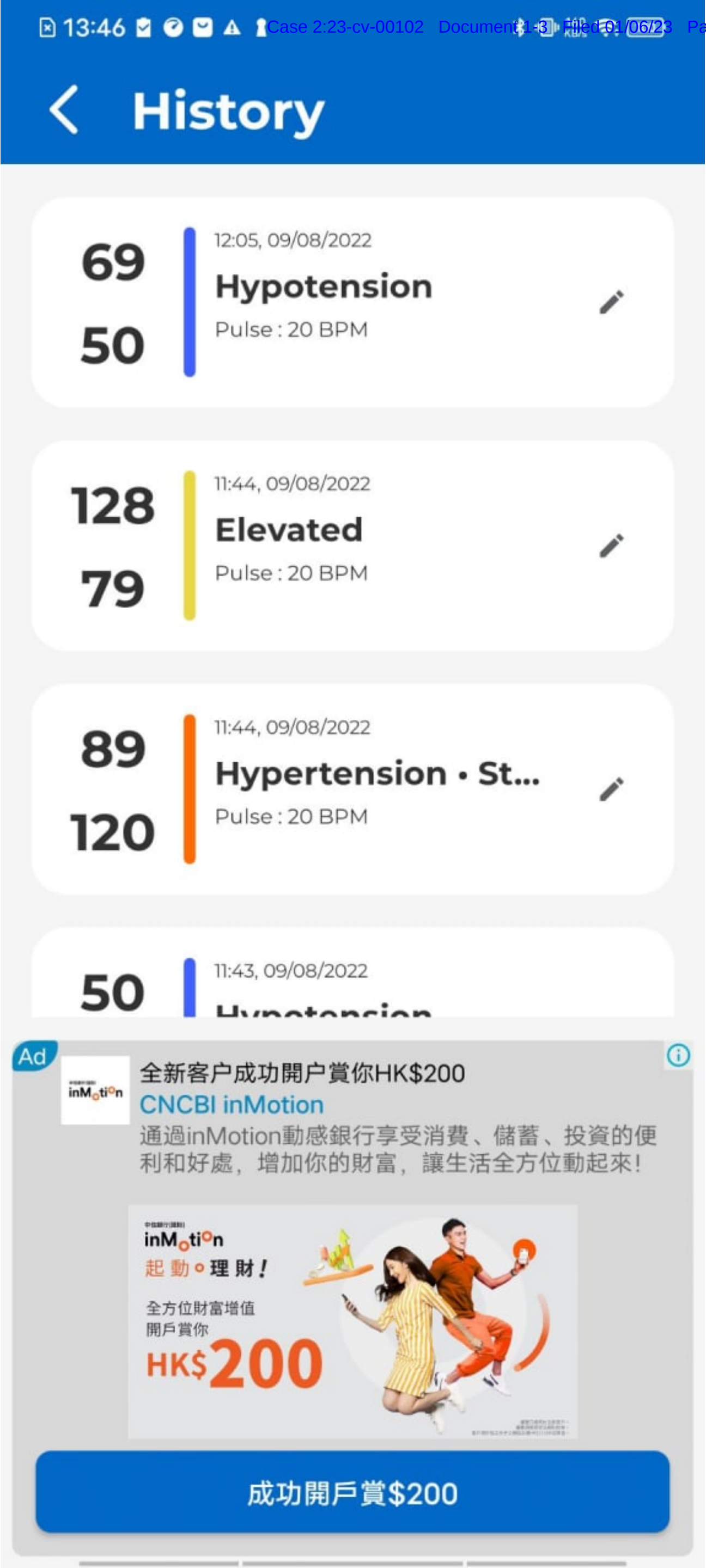


保存更改弹窗文案一致



左抄袭右我们

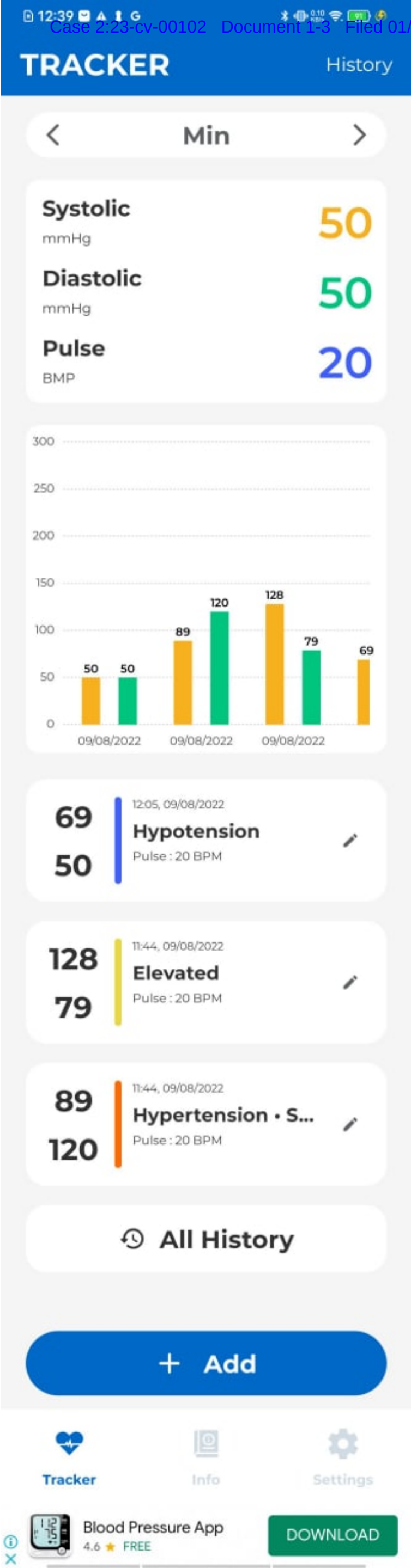
历史列表的排版一致 卡片排版一致



左抄袭右我们



Tacker页面  
结构一致 历史卡片内容排版一致



左抄袭右我们

# **EXHIBIT D**

**From:** [removals@google.com](mailto:removals@google.com) <[removals@google.com](mailto:removals@google.com)>  
**Sent:** Friday, December 23, 2022 12:33 PM  
**To:** David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>  
**Subject:** Re: Your Request to Google [ -1815000033310]

Hello,

We received a counter notification, as described in 17 U.S.C. § 512 g, in response to your Digital Millennium Copyright Act (DMCA) notice. Below is a text copy of the counter notification. We await your notice within 10 business days that you have filed either an action that seeks a court order to restrain the counter notifier's allegedly infringing activity or a claim of infringement against the counter notifier with the US Copyright Office Copyright Claims Board. To process your complaint, we need a copy of one of the following:

- Action filed
- claim filed
- Applicable court order
- Applicable determination of infringement from the

If we don't receive such notice from you, we'll reinstate the material in question.

For more information about the DMCA and the requirements of a counter notice, review [DMCA policy and law](#). If you have legal questions about this, consult your own legal counsel.

=====

UcgiaCTR

Vietnam

Huỳnh Tấn Phát

Hau Duong

Danh Nguyen

Hau Duong

Thị Ngọc Thy

Apero

a ch email li n h

[haudt@apero.vn](mailto:haudt@apero.vn)

a ch

Hanoi, ietnam

S i n tho i

8 3 755 828

URL c a n idung ang c c p n

<https://play.google.com/store/apps/details?id=com.bloodpressurechecker.bpmonitor.bptracker>

h ph t tri n

Apero Technologies Group - TrustedApp

T n ng d ng

lood Pressure Tracker

T i sao b n l i y u c u kh i ph c?

h n m t trong c c l a ch n b n d i.

T i l ch s h u n idung

ui l ng cung c p th m chi ti t c minh y u c u c a b n

After carefully checking, am SUR 100 that my app has T violated this law. The suspend action taken is too severe with my app, because of reasons below:

Fist: Their app has not yet provided proof of owning the copyright. They have intellectual property registration for this property

Second: My app is T the same in terms of U and content in the app compared to their app, including from color, te t to design and content. This is an application my team research and develop. We do everything ourselves including: code, ui/u , graphics, content.. We can provide our own U U designs at figma link:

[https://www.figma.com/file/A\\_bdf\\_uh\\_tMD2\\_u\\_A\\_F\\_/lood-Pressure](https://www.figma.com/file/A_bdf_uh_tMD2_u_A_F_/lood-Pressure)

And this is my app developed in android studio:

[https://drive.google.com/drive/folders/1d\\_v3Lb\\_rU\\_g\\_lR\\_u\\_O\\_R\\_R\\_mP\\_s](https://drive.google.com/drive/folders/1d_v3Lb_rU_g_lR_u_O_R_R_mP_s)

So think the DM A notice is a not fair with me.



hope the Google Play team will double check this issue, and R ST R my app on Google Play Store. Thank you

T i ng v iquy nt i ph n c a T a n l i n bang i v i kh u v c ph p l n i t i s i n h s ng h o c u n c a l i f o r n i a  
n u a c h c a t i ngo i Hoa v t i s c h p n h n t ng t t r t t a t c n h n c u n g c p t h ng b o t h e o t i u m c  
c 1 h o c n g i i d i n c h o c n h n .

nh d u c n h n

T i i n t h , c h p n h n b t r ng ph t n u k h a i m a n , r ng t i t h c s t i n l n i d u n g c c n h t r n b a h o c  
v h i u h a d o n h m l n h o c c n h s a i t i l i u c n b a h o c v h i u h a .

nh d u c n h n

h k

Hau Duong

=====

Regards,

The Google Team

## Report alleged copyright infringement

Country of residence

United States

Full legal name

David Silver

Company name

Bayramoglu Law Offices LLC

Full legal name of the copyright holder you represent

JIAO MINGYANG

Contact email address

[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)

Identify and describe the copyrighted work

We had filed a previous DMCA Takedown Request for this application, and Google claimed it could not find the infringing material and requested additional evidence. When we provided the additional evidence, Google said it would not consider additional evidence and required us to submit a new DMCA Takedown Request. Google then proceeded to ignore all of our later [correspondence](#). So here we are filing a second DMCA Takedown Request as there are still multiple text and user interface layout that infringes on our client's copyrights, which can be seen in the supplemental material attached. Please take the appropriate action in accordance with the DMCA.

Where can we see an authorized example of the work?

<https://play.google.com/store/apps/details?id=bloodpressure.bloodpressureapp.bloodpressuretracker>

Allegedly infringing URLs

<https://play.google.com/store/apps/details?id=com.bloodpressurechecker.bpmonitor.bptracker>

Attach a screenshot of the allegedly infringing material

Supplementary Material.pdf

I have a good faith belief that use of the copyrighted materials described above as allegedly infringing is not authorized by the copyright owner, its agent, or the law.

Please check to confirm

The information in this notification is accurate and I swear, under penalty of perjury, that I am the copyright owner or am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

Please check to confirm

I understand that a copy of the notice may be sent to the developer of the affected content.

Please check to confirm

Signature

David Silver

# **EXHIBIT E**

## Shelley Ivan

---

**From:** Shelley Ivan  
**Sent:** Friday, January 6, 2023 2:53 AM  
**To:** Shelley Ivan  
**Subject:** FW: Re: Your Request to Google [5-3967000033498]

----- Forwarded message -----

From: <[removals@google.com](mailto:removals@google.com)>  
Date: Tue, Oct 25, 2022 at 12:23 AM  
Subject: Re: Your Request to Google [5-3967000033498]  
To: <[deepthought7.5m@gmail.com](mailto:deepthought7.5m@gmail.com)>

Hello,

Thanks for reaching out to us.

We've decided not to take action on this content. You could send your request straight to the individual who posted the content.

If you need more information about the individual who posted the content, you'll need to serve us with valid legal process. For more information about this, contact us at [google-legal-support@google.com](mailto:google-legal-support@google.com) from the U.S., or [internationalcivil@google.com](mailto:internationalcivil@google.com) from outside the U.S.

If you pursue legal action and the content is found to be illegal or ordered to be removed, you can send us the court order seeking removal using [this form](#).

Regards,

The Google Team

For more information about our content removal process access [g.co/legal](https://g.co/legal).

## Report alleged copyright infringement

Country of residence  
Singapore

Full legal name  
Sherry Smith

Full legal name of the copyright holder you represent  
QR Code Scanner.

Contact email address

[deepthought7.5m@gmail.com](mailto:deepthought7.5m@gmail.com)

Identify and describe the copyrighted work

Dear Team,

I'm writing to report that an infringing app badly 100% Copied our original In-app Texts and UI Design WITHOUT any change. This high degree of coincidence is by no means an accident. We created all In-app Text by ourselves, we can provide all source evidence if needed.

Pursuant to Section 512(c) of the Digital Millennium Copyright Act("DMCA"), we would like to request immediate removal of this infringing app from the Google Play platform.

Many thanks in advance.

Regards,

Sherry

Where can we see an authorized example of the work?

<https://play.google.com/store/apps/details?id=bloodpressure.bloodpressureapp.bloodpressuretracker&hl=en&gl=us>

Allegedly infringing URLs

<https://play.google.com/store/apps/details?id=bloodpressureapp.bloodpressuremonitor.bloodpressuretracker>

Attach a screenshot of the allegedly infringing material

Violation Material.pdf

I have a good faith belief that use of the copyrighted materials described above as allegedly infringing is not authorized by the copyright owner, its agent, or the law.

**Please check to confirm**

The information in this notification is accurate and I swear, under penalty of perjury, that I am the copyright owner or am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

**Please check to confirm**


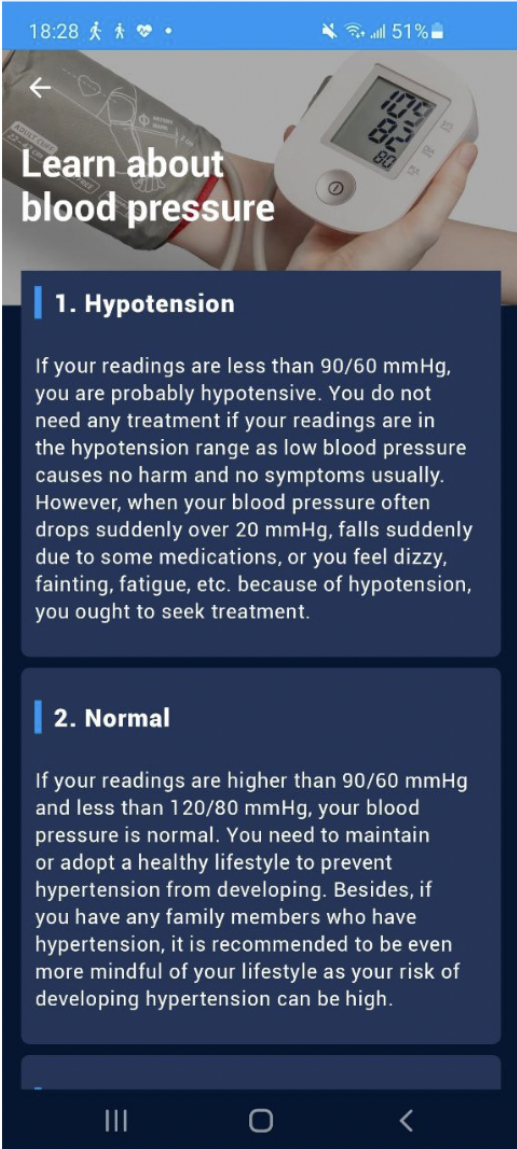
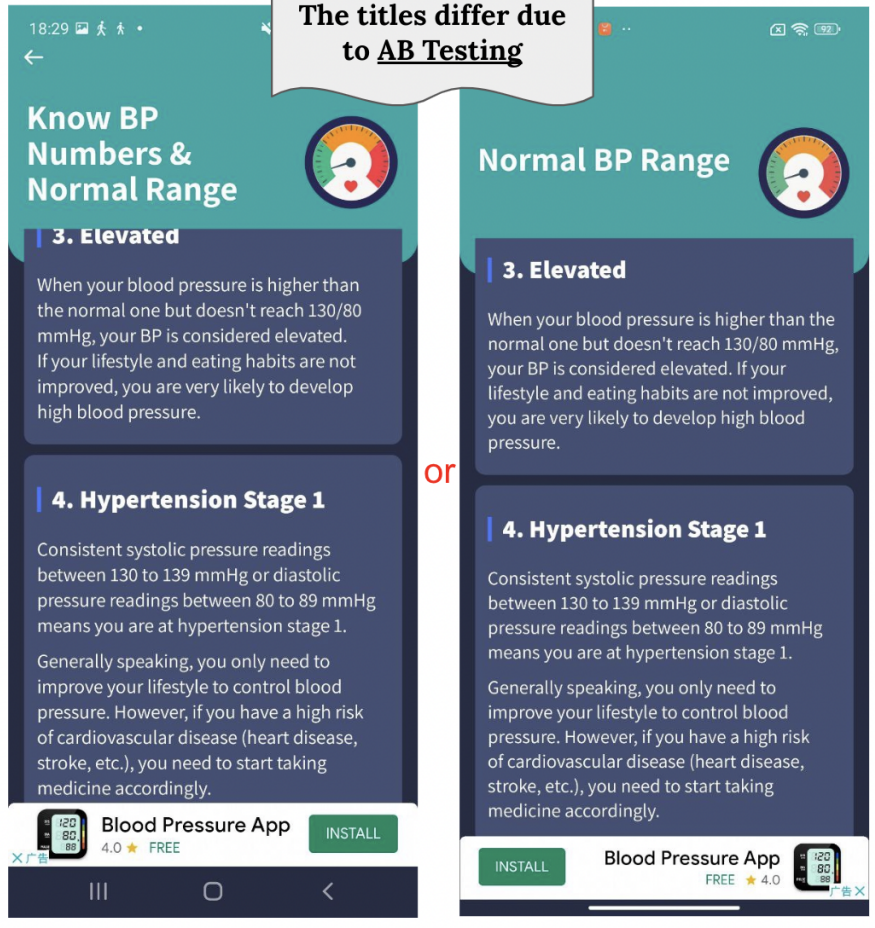
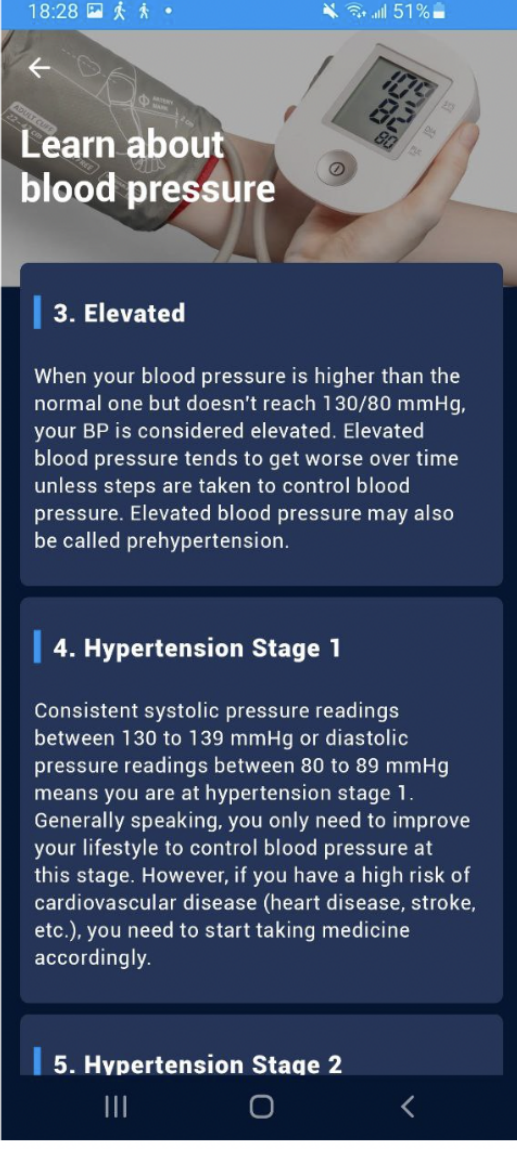
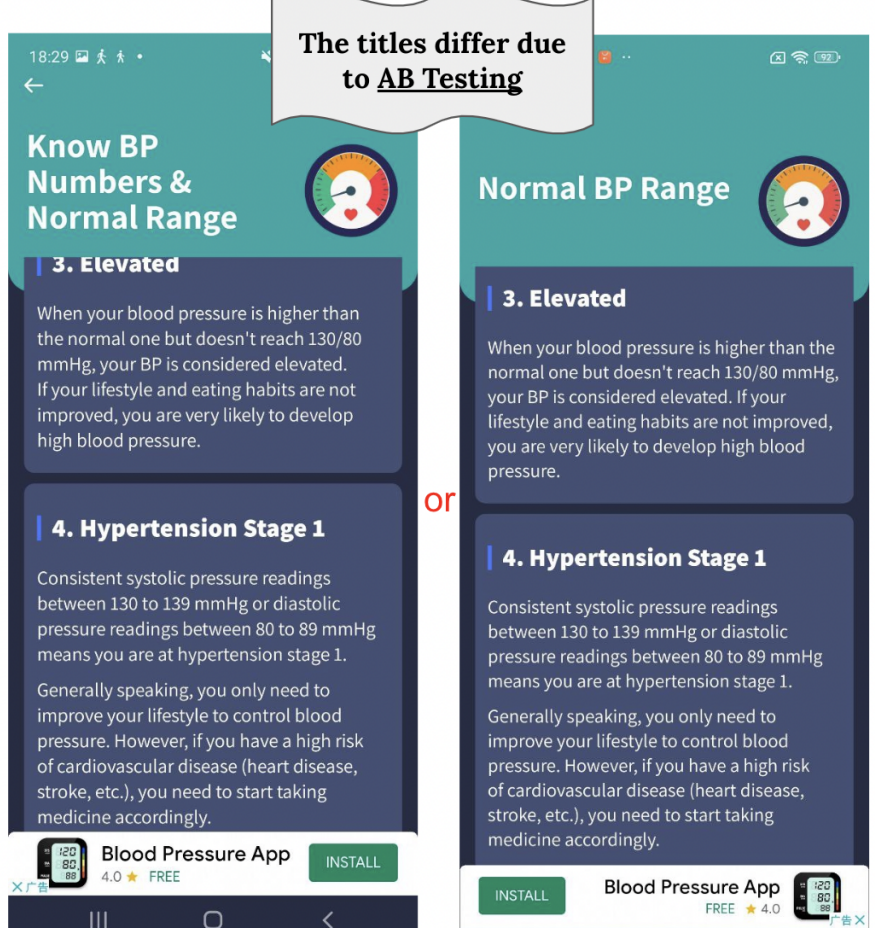
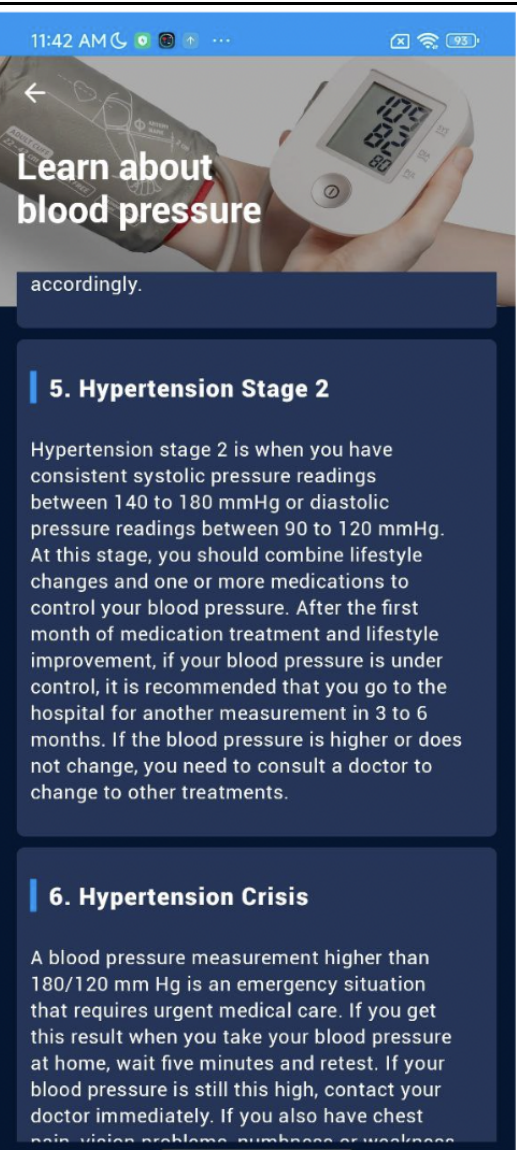
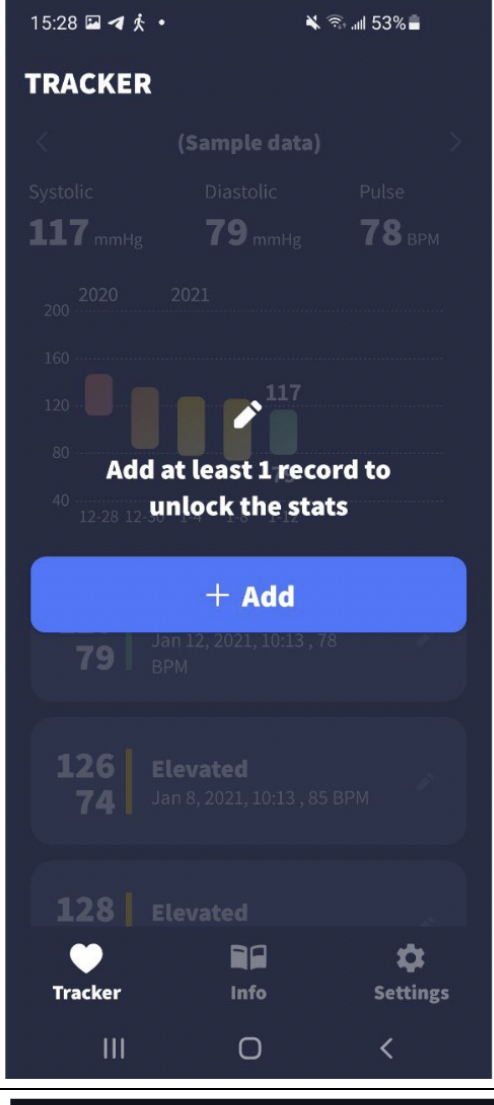
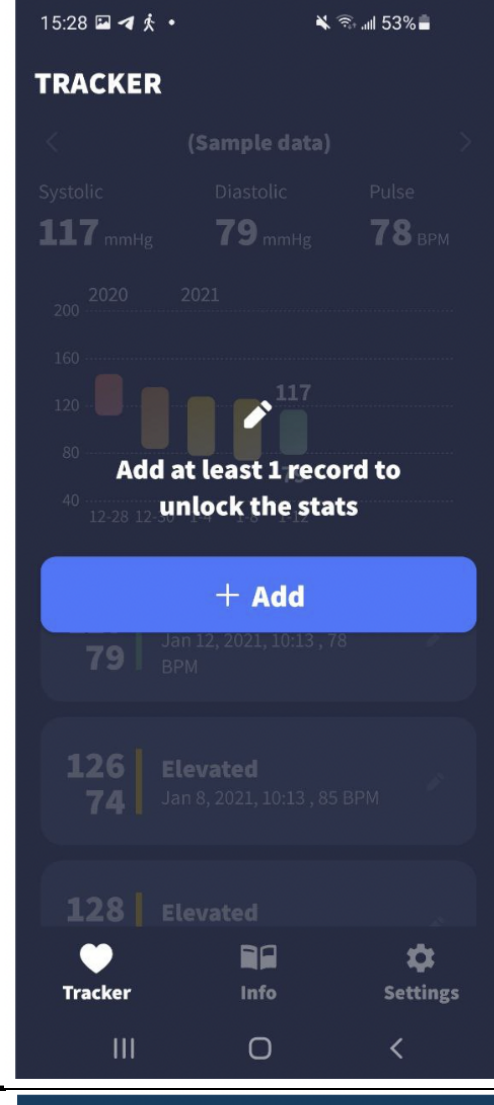
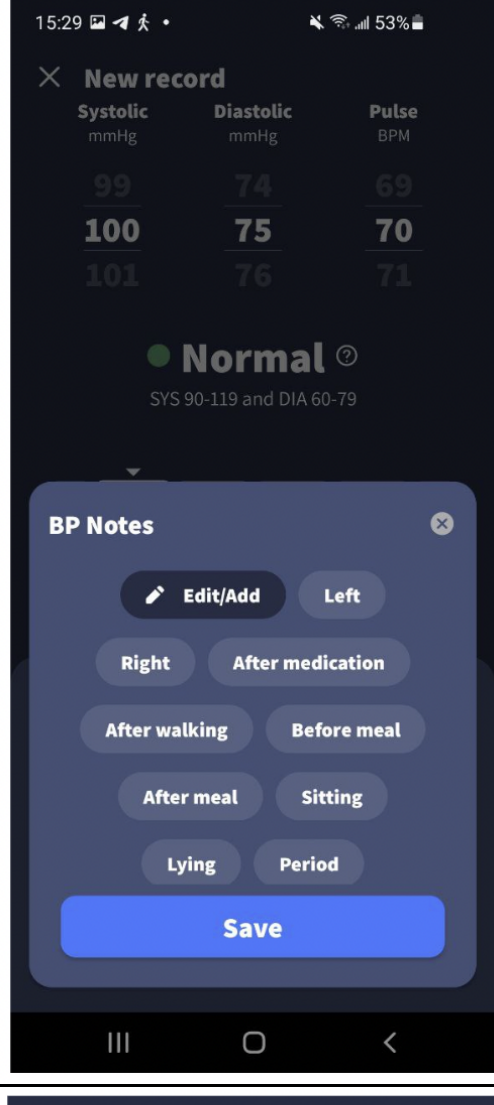
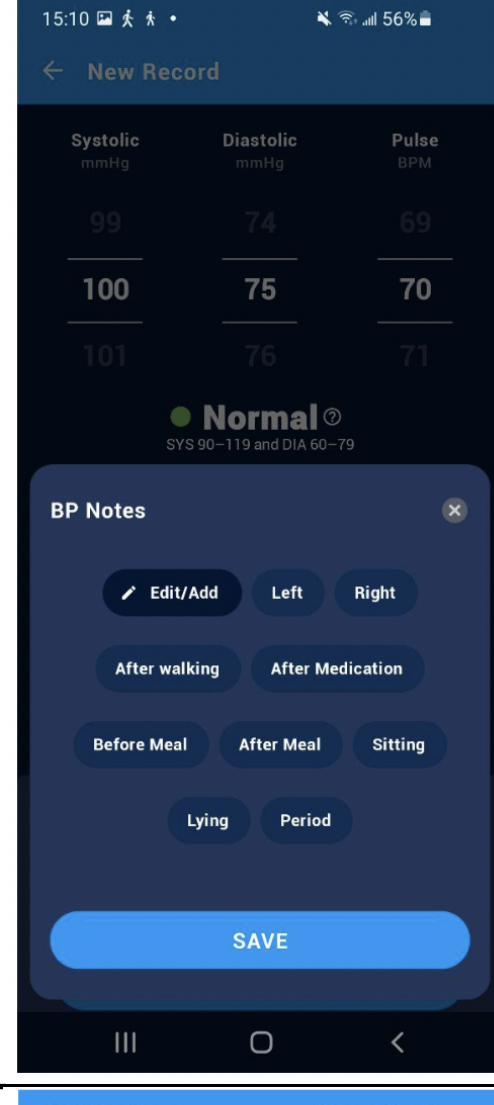
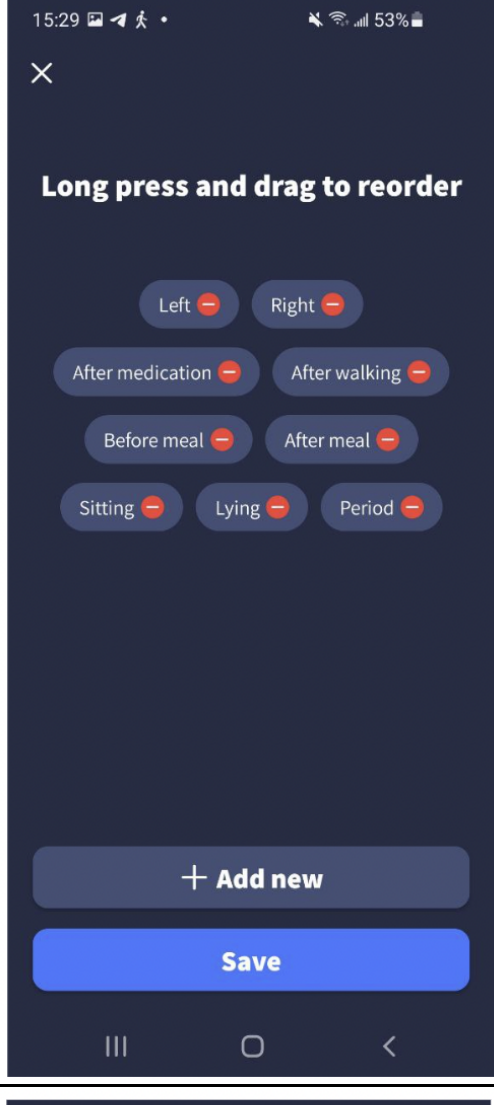
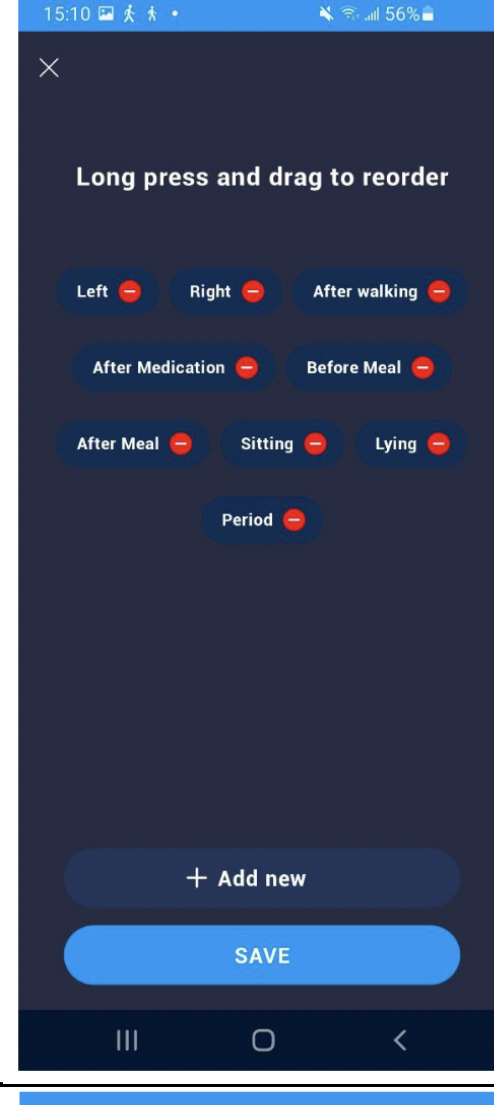
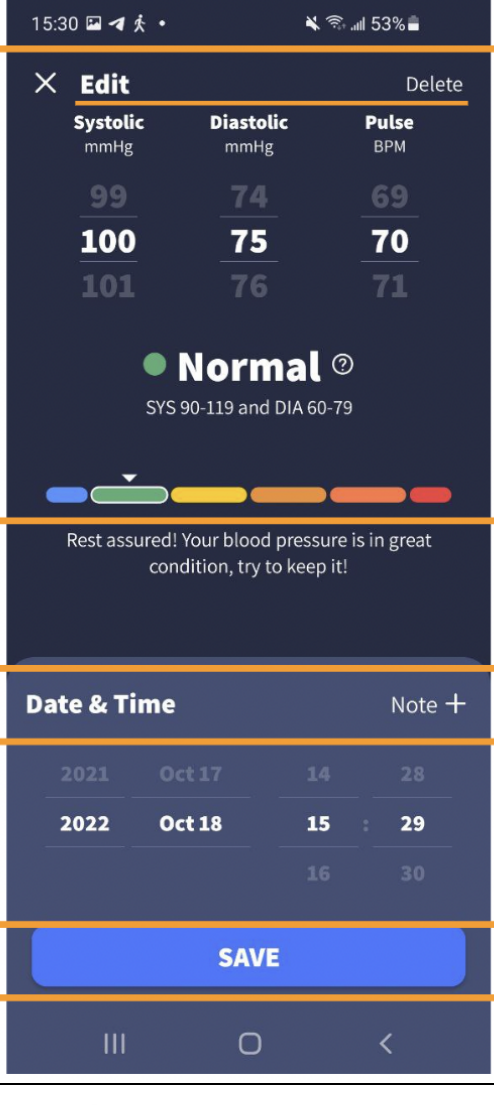
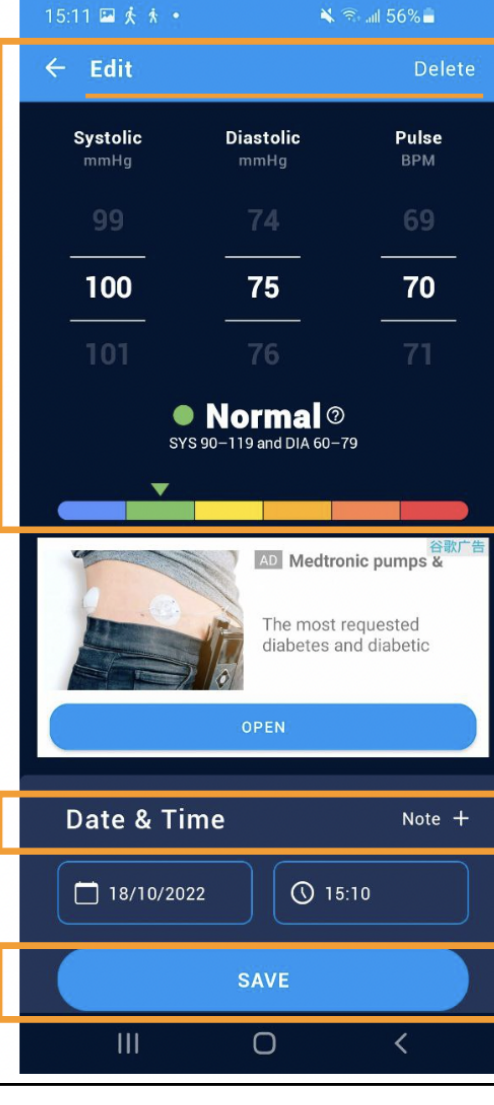
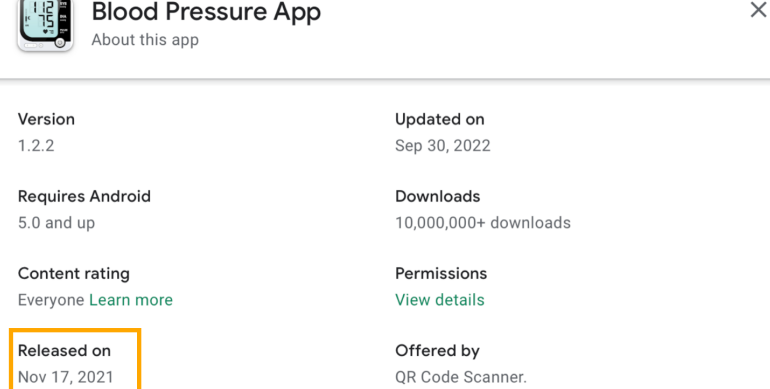
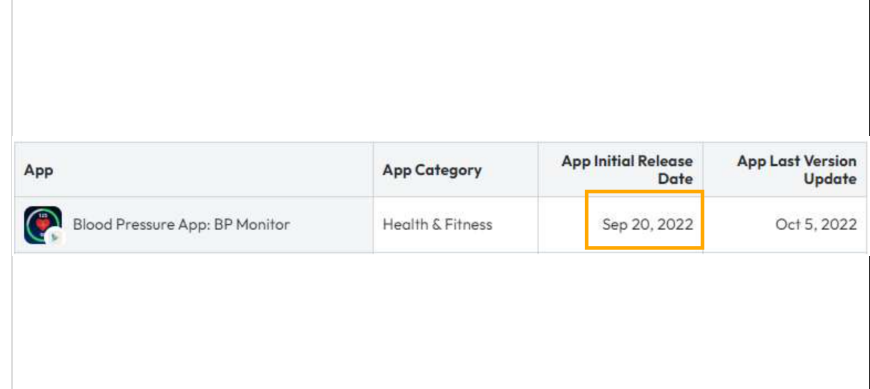
I understand that a copy of the notice may be sent to the developer of the affected content.

**Please check to confirm**

Signature

Sherry Smith



	Our Original Creatives	Infringing Copies
<p><b>100% the Same</b></p> <p>Totally the same copies of our articles as shown at right</p>		
<p><b>100% the Same</b></p> <p>Totally the same copies of our articles as shown at right</p>		
<p><b>100% the Same</b></p> <p>Totally the same copies of our articles as shown at right</p>		
<p><b>100% the Same</b></p> <p>Totally the same copies of our user interface as shown at right</p>		
<p><b>100% the Same</b></p> <p>Totally the same copies of our user interface as shown at right</p>		
<p><b>100% the Same</b></p> <p>Totally the same copies of our user interface as shown at right</p>		
<p><b>100% the Same</b></p> <p>Totally the same copies of our user interface as shown at right</p>		
<p>Our app was copyright protected for the <b>EARLIER RELEASE</b></p>		



## Shelley Ivan

---

**From:** Shelley Ivan  
**Sent:** Friday, January 6, 2023 2:30 AM  
**To:** Shelley Ivan  
**Subject:** FW: Re: Your Request to Google [2-7084000033674]

----- Forwarded message -----

From: <[removals@google.com](mailto:removals@google.com)>  
Date: Thu, Dec 1, 2022 at 11:08 PM  
Subject: Re: Your Request to Google [2-7084000033674]  
To: <[deepthought7.5m@gmail.com](mailto:deepthought7.5m@gmail.com)>

Hello,

Thanks for reaching out to us.

We've decided not to take action on this content. You could send your request straight to the individual who posted the content.

If you need more information about the individual who posted the content, you'll need to serve us with valid legal process. For more information about this, contact us at [google-legal-support@google.com](mailto:google-legal-support@google.com) from the U.S., or [internationalcivil@google.com](mailto:internationalcivil@google.com) from outside the U.S.

If you pursue legal action and the content is found to be illegal or ordered to be removed, you can send us the court order seeking removal using [this form](#).

Regards,

The Google Team

For more information about our content removal process access [g.co/legal](https://g.co/legal).

## Report alleged copyright infringement

Country of residence  
Singapore

Full legal name  
Sherry Smith

Full legal name of the copyright holder you represent  
QR Code Scanner.

Contact email address

[deephought7.5m@gmail.com](mailto:deephought7.5m@gmail.com)

Identify and describe the copyrighted work

QR Code Scanner. is the Copyright owner of the source code and articles in the app.

The developer "Begamob Global" maliciously copied our string text on source code and in-app articles & UI design WITHOUT any changes.

We created all source code and articles by ourselves, we can provide all of the source evidence if needed. The infringing apps violated the Copyright basic protection, bringing negative impact.

Pursuant to Section 512(c) of the Digital Millennium Copyright Act ("DMCA"), we would like to request an immediate removal of these infringing apps from the Google Play platform. Your assistance in this matter is highly appreciated.

Details of our copyrighted applications and the infringing evidence are on the attachment. Many thanks in advance.

Regards,

Where can we see an authorized example of the work?

<https://play.google.com/store/apps/details?id=bloodpressure.bloodpressureapp.bloodpressuretracker&gl=us>

Allegedly infringing URLs

<https://play.google.com/store/apps/details?id=com.bloodpressure.tracker.app.bpmonitor.bptracker&gl=us>

Attach a screenshot of the allegedly infringing material

BP Infringement Material.pdf

I have a good faith belief that use of the copyrighted materials described above as allegedly infringing is not authorized by the copyright owner, its agent, or the law.

**Please check to confirm**

The information in this notification is accurate and I swear, under penalty of perjury, that I am the copyright owner or am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

**Please check to confirm**

I understand that a copy of the notice may be sent to the developer of the affected content.

**Please check to confirm**

Signature

Sherry Smith

----- Forwarded message -----

From: <[removals@google.com](mailto:removals@google.com)>  
Date: Tue, Dec 13, 2022 at 10:08 PM  
Subject: Re: Your Request to Google [9-3832000033281]  
To: <[deepthought7.5m@gmail.com](mailto:deepthought7.5m@gmail.com)>

Hello,

Thanks for reaching out to us.

Regarding the following URLs:

<https://play.google.com/store/apps/details?id=com.bloodpressure.tracker.app.bpmonitor.bptracker>

We note that the developer in question has provided contact information in their application listing. Please confirm that you have first attempted to resolve this issue with the developer of the application in question by contacting them at [info@begamob.com](mailto:info@begamob.com).

Regards,

The Google Team

For more information about our content removal process access [g.co/legal](https://g.co/legal).

Report alleged copyright infringement

Country of residence

Singapore

Full legal name

Ada Lee

Full legal name of the copyright holder you represent

QR Code Scanner.

Contact email address

deepthought7.5m@gmail.com

Identify and describe the copyrighted work

This infringing app uses our in-app articles without authorization.

Where can we see an authorized example of the work?

<https://play.google.com/store/apps/details?id=bloodpressure.bloodpressureapp.bloodpressuretracker>

Allegedly infringing URLs

<https://play.google.com/store/apps/details?id=com.bloodpressure.tracker.app.bpmonitor.bptracker>

Attach a screenshot of the allegedly infringing material

Infringement Material\_1209.pdf

# Report Intentional Plagiarism of Copyrighted In-app Articles



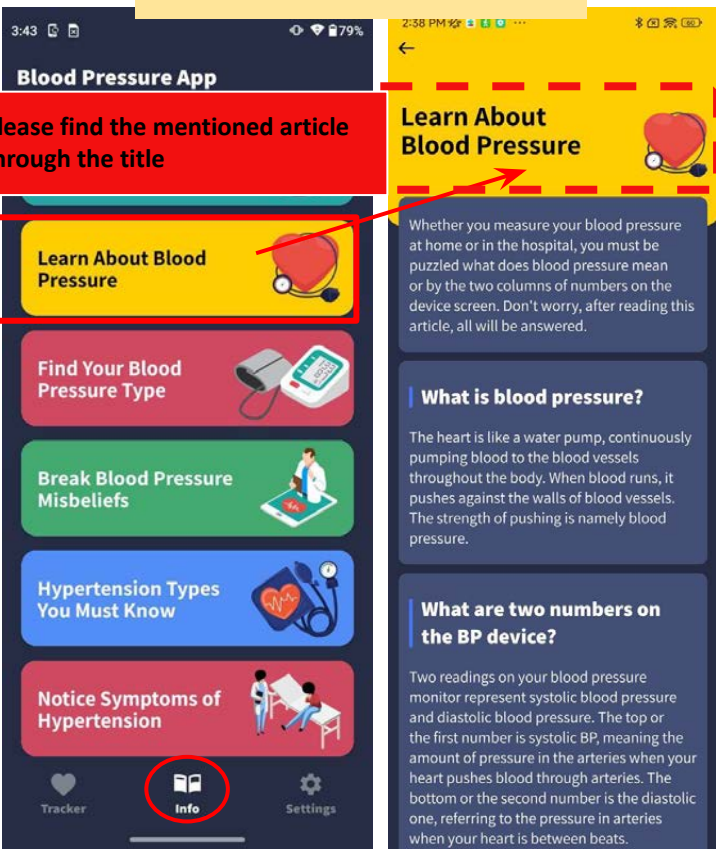
[Infringement Link](#)

**Blood Pressure Tracker App**

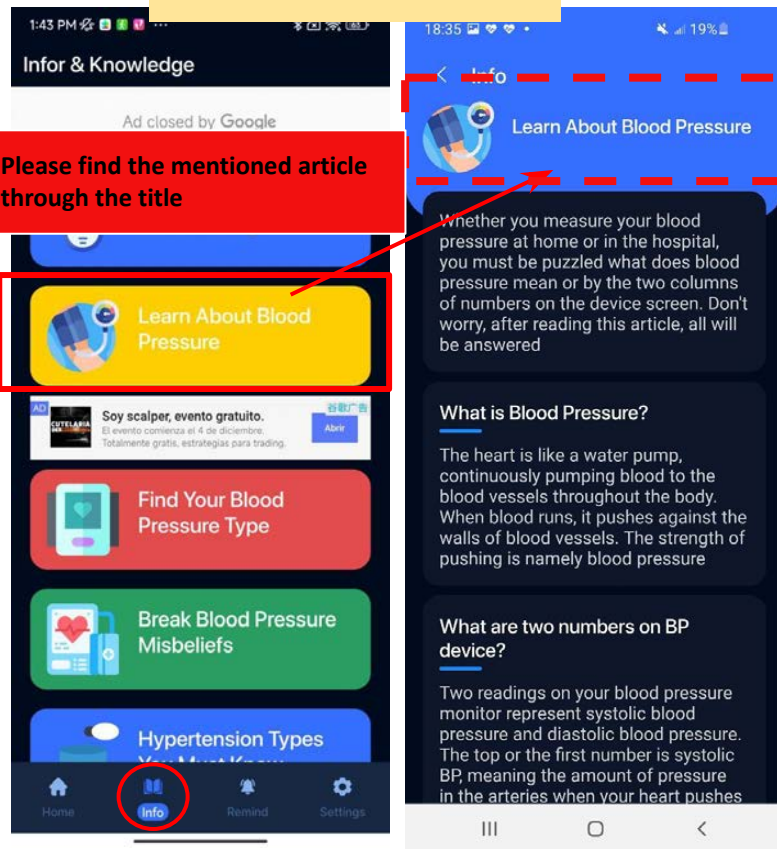
# ➤ To Find the Mentioned Articles

Case 2:23-cv-00102 Document 1-6 Filed 01/06/23 Page 5 of 20 Page ID #:59

## Our Copyrighted Work



## Infringement



# Article 1

Our Copyrighted Work

Infringement

100% plagiarized copyrighted in-app articles deliberately without any changes

## Learn About Blood Pressure



Whether you measure your blood pressure at home or in the hospital, you must be puzzled what does blood pressure mean or by the two columns of numbers on the device screen. Don't worry, after reading this article, all will be answered.

### What is blood pressure?

The heart is like a water pump, continuously pumping blood to the blood vessels throughout the body. When blood runs, it pushes against the walls of blood vessels. The strength of pushing is namely blood pressure.

### What are two numbers on the BP device?

Two readings on your blood pressure monitor represent systolic blood pressure and diastolic blood pressure. The top or the first number is systolic BP, meaning the amount of pressure in the arteries when your heart pushes blood through arteries. The bottom or the second number is the diastolic one, referring to the pressure in arteries when your heart is between beats.

18:35 19%

< Info



## Learn About Blood Pressure

Whether you measure your blood pressure at home or in the hospital, you must be puzzled what does blood pressure mean or by the two columns of numbers on the device screen. Don't worry, after reading this article, all will be answered

### What is Blood Pressure?

The heart is like a water pump, continuously pumping blood to the blood vessels throughout the body. When blood runs, it pushes against the walls of blood vessels. The strength of pushing is namely blood pressure

### What are two numbers on BP device?

Two readings on your blood pressure monitor represent systolic blood pressure and diastolic blood pressure. The top or the first number is systolic BP, meaning the amount of pressure in the arteries when your heart pushes

Slide to see the complete text



**Proof of Originality****Original Article****Learn About Blood Pressure**

Whether you measure your blood pressure at home or in the hospital, you must be puzzled what does blood pressure mean or by the two columns of numbers on the device screen. Don't worry, after reading this article, all will be answered.

<h1> What is blood pressure?

The heart is like a water pump, continuously pumping blood to the blood vessels throughout the body. When blood runs, it pushes against the walls of blood vessels. The strength of pushing is namely blood pressure.

<h1>What are two numbers on the BP device?

Two readings on your blood pressure monitor represent systolic blood pressure and diastolic blood pressure. The top or the first number is systolic BP, meaning the amount of pressure in the arteries when your heart pushes blood through arteries. The bottom or the second number is the diastolic one, referring to the pressure in arteries when your heart is between beats.

**Reference**

In the most basic terms, when your heart beats, it pumps blood throughout your body, supplying it with the oxygen and energy it needs. As your blood moves, it pushes against the sides of your blood vessels. The strength of this pushing is what is known as blood pressure.

Normal blood pressure is vital to life. Without the pressure that forces our blood to flow around the circulatory system, no oxygen or nutrients would be delivered through our arteries to the tissues and organs.

When you get your blood pressure numbers, there are two of them. The first, or "top" one, is your systolic blood pressure. The second, or "bottom," one is diastolic blood pressure. Knowing both is important and could save your life.

The top number refers to the amount of pressure in your arteries during the contraction of your heart muscle. This is called systolic pressure.

The bottom number refers to your blood pressure when your heart muscle is between beats. This is called diastolic pressure.

**Reference Website**

<https://www.matherhospital.org/wellness-at-mather/diseases-conditions/cardiology-101-what-does-blood-pressure-really-mean/>

<https://www.medicalnewstoday.com/articles/270644>

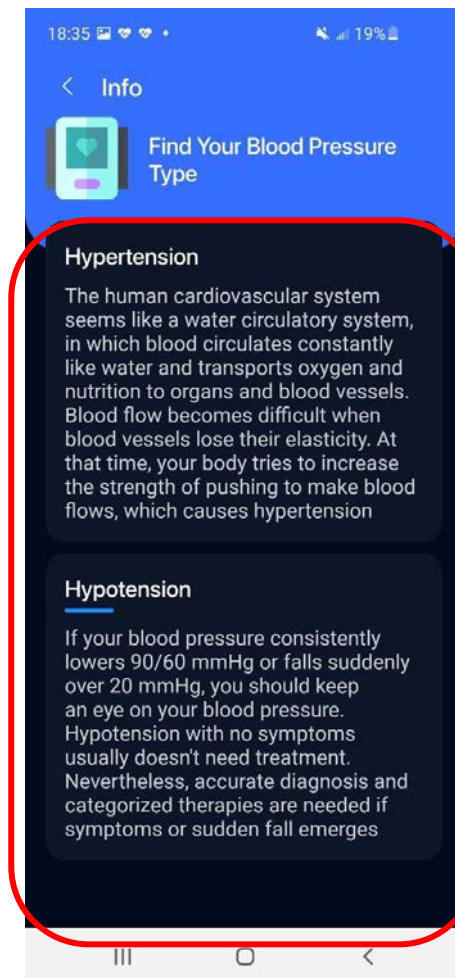
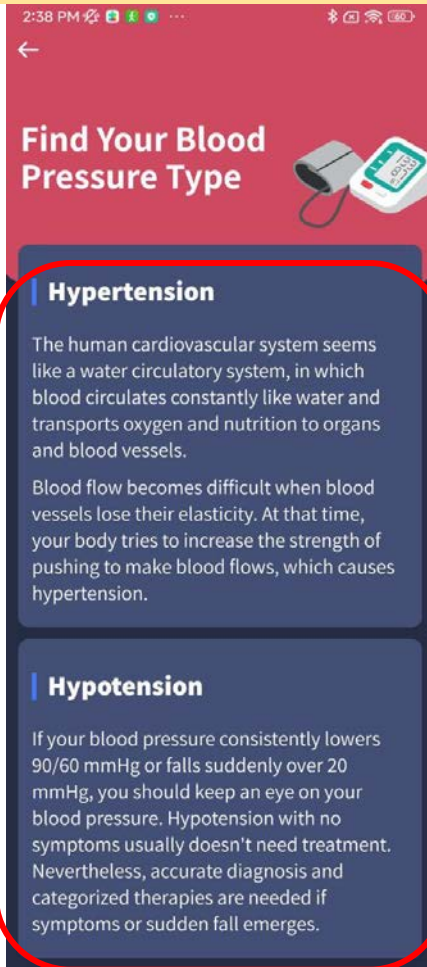
<https://www.webmd.com/hypertension-high-blood-pressure/guide/diastolic-and-systolic-blood-pressure-know-your-numbers#1>

<https://www.healthline.com/health/high-blood-pressure-hypertension/blood-pressure-reading-explained>

Above is the **editing process of our original articles:**

**Our team created all the articles by ourselves with the detailed reference information as shown right**

100% plagiarized copyrighted in-app  
articles deliberately without any changes



## Original Article

Find Your Blood Pressure Type	Reference	Reference Website
<h1> Hypertension</h1> <p>The human cardiovascular system seems like a water circulatory system, in which blood circulates constantly like water and transports oxygen and nutrition to organs and blood vessels.</p> <p>Blood flow becomes difficult when blood vessels lose their elasticity. At that time, <i>your body tries to increase the strength of pushing to make blood flows, which causes hypertension.</i></p> <h1> Hypotension</h1> <p>If your blood pressure <i>consistently lowers 90/60 mmHg or falls suddenly over 20 mmHg</i>, you should keep an eye on your blood pressure. Hypotension with <i>no symptoms usually doesn't need treatment</i>. Nevertheless, accurate diagnosis and categorized therapies are needed if symptoms or sudden fall emerges.</p>	<p>Low blood pressure is a reading of less than 90/60mmHg. It does not always cause symptoms, but you may need treatment if it does.</p> <p>Blood pressure is the amount of force exerted on the artery walls by the pumping blood. <i>High blood pressure (hypertension) means that your blood is pumping with more force than normal through your arteries.</i></p>	<p><a href="https://www.nhs.uk/conditions/low-blood-pressure-hypotension/">https://www.nhs.uk/conditions/low-blood-pressure-hypotension/</a></p> <p><a href="https://www.betterhealth.vic.gov.au/health/conditionsandtreatments/blood-pressure-high-hypertension">https://www.betterhealth.vic.gov.au/health/conditionsandtreatments/blood-pressure-high-hypertension</a></p>

Above is the **editing process of our original articles:**  
**Our team created all the articles by ourselves with the detailed reference information as shown right**

## Our Copyrighted Work



Slide to see the complete text

## Infringement



Slide to see the complete text

100% plagiarized copyrighted in-app articles deliberately without any changes



# Proof of Originality

## Original Article

Break Blood Pressure Misbeliefs	Reference	Reference Website
<p>You may hear all kinds of myths about blood pressure. Believing in these myths can really make your blood pressure control vain or even make your situation worse. Below are 7 common misunderstands concerning blood pressure. Check out the following and stop believing them.</p>	<p>Low blood pressure isn't anything to worry about.</p> <p>Fact: Low blood pressure, or hypotension, can be a concern if it causes symptoms, such as dizziness, fainting, or even shock. Dizziness or fainting could lead to a serious fall. Shock, if not treated immediately, could end in death. However, it's true that low blood pressure is actually normal for some people.</p>	<p><a href="https://www.healthgrades.com/right-care/high-blood-pressure/9-myths-about-blood-pressure">https://www.healthgrades.com/right-care/high-blood-pressure/9-myths-about-blood-pressure</a></p>
<p>&lt;h1&gt;1. No worries if I have the low blood pressure</p> <p>Generally speaking, if you have hypotension, some small lifestyle changes can solve the problem. However, if you experience a sudden fall of over 20 mmHg or feel fainting, fatigue, blurred vision, etc., you are in need of professional treatment. If not treated immediately, the hypotension can be life-threatening.</p>	<p>A sudden fall in blood pressure can be dangerous. A change of just 20 mm Hg — a drop from 110 systolic to 90 mm Hg systolic, for example — can cause dizziness and fainting when the brain fails to receive enough blood. And big drops, such as those caused by uncontrolled bleeding, severe infections or allergic reactions, can be life-threatening.</p>	<p><a href="https://www.mayoclinic.org/diseases-conditions/low-blood-pressure/symptoms-causes/syc-20355465#:~:text=Most%20doctors%20consider%20blood%20pressure,blood%20pressure%20can%20be%20dangerous.">https://www.mayoclinic.org/diseases-conditions/low-blood-pressure/symptoms-causes/syc-20355465#:~:text=Most%20doctors%20consider%20blood%20pressure,blood%20pressure%20can%20be%20dangerous.</a></p>
<p>&lt;h1&gt;2. I don't have hypertension if no symptoms emerge</p> <p>Do you know that hypertension is called the "silent killer"? It often runs silent and may have no symptoms, or the symptoms may be mild, which will not be taken seriously while it is causing great damage to your health.</p>	<p>High blood pressure often runs silent and deep, stealthily building and cloaking its symptoms. As it continues along its insidious path, it can affect organ function and lead to serious and deadly consequences.</p>	<p><a href="https://www.franciscanhealth.org/community/blog/hypertension-high-blood-pressure-a-silent-killer">https://www.franciscanhealth.org/community/blog/hypertension-high-blood-pressure-a-silent-killer</a></p>
<p>When the symptoms appear, it indicates that the heart, brain, kidney, blood vessel or other organs have been severely damaged and cannot maintain normal functions. At that time, the optimal treatment opportunity has been</p>	<p>Fact: High blood pressure doesn't have symptoms. In fact, nearly one-third of U.S. adults with high blood pressure don't even know they have it. A simple blood pressure measurement can find those affected, yet still undiagnosed</p>	<p><a href="https://www.healthgrades.com/right-care/high-blood-pressure/9-myths-about-blood-pressure">https://www.healthgrades.com/right-care/high-blood-pressure/9-myths-about-blood-pressure</a></p>

Above is the **editing process of our original articles:**

**Our team created all the articles by ourselves with the detailed reference information as shown right**

## Article 4

## Our Copyrighted Work

## Infringement

100% plagiarized copyrighted in-app articles deliberately without any changes





**Proof of Originality****Original Article**

First Aid Tips for Hypotensive Crisis		
	Reference	Reference Website
<p>When your blood pressure is very low or drops rapidly, it can be a medical emergency. The first step should be contacting your doctor for immediate medical treatment and taking a careful review of your medications. But what else can you do? Learn tips below and you will no longer be clueless.</p>	<p>If you feel faint, you should <a href="#">immediately sit or lie down if you can do so safely</a>.</p>	
<p>&lt;h1&gt;1. Liedown</p>	<p>The moment you experience the giddiness, dizziness, black out or any other symptom of low blood pressure, lie down <a href="#">on a flat surface</a>. Close your eyes for a few minutes or until you feel your pressure normalise.</p>	<p><a href="https://www.bupa.co.uk/health-information/heart-blood-circulation/low-blood-pressure-hypotension">https://www.bupa.co.uk/health-information/heart-blood-circulation/low-blood-pressure-hypotension</a></p>
<p>When you are experiencing any hypotensive symptoms, try to <a href="#">sit or lie down on a flat surface safely and immediately</a>. Keeping standing can make your postural hypotension worse. Lying down or sitting <a href="#">benefits your blood pressure normalization</a>.</p>	<p>Drink at least 2 to 3 litres of water every day. Besides this, include drinks like <a href="#">coconut water, bael ka sharbat and aam panna</a> in your low blood pressure diet. These will give you the necessary electrolytes required to maintain the fluids in your body. Dehydration is a common cause of low blood pressure. Pomegranate juice is rich in antioxidants called polyphenols and may help you lower your blood pressure. One of the best ways to fight dehydration is water; so, do not forget to load up on enough water for the day.</p>	<p><a href="https://www.thehealthsite.com/diseases-conditions/first-aid-for-low-blood-pressure-b1215-356404/">https://www.thehealthsite.com/diseases-conditions/first-aid-for-low-blood-pressure-b1215-356404/</a></p>
<p>&lt;h1&gt;2. Stay hydrated</p>	<p>You can even add a pinch of salt and sugar to the water. <a href="#">Sodium in the salt improves your blood pressure while sugar helps in restoring the glucose level</a> (if caused due to low blood glucose or hypoglycaemia).</p>	<p><a href="https://food.ndtv.com/health/home-remedies-for-low-blood-pressure-1287697">https://food.ndtv.com/health/home-remedies-for-low-blood-pressure-1287697</a></p>
<p><a href="#">One of the common causes of hypotension is dehydration</a>. Thus, drinking more fluids, <a href="#">covering water, coconut water, and sports drink</a>, can not only ease your dehydration but also helps maintain the fluids in your body. Besides, you can add a small amount of <a href="#">salt or sugar to improve your blood pressure or restore your glucose level</a>.</p>	<p>Generally, <a href="#">the higher your sodium intake, the higher your blood pressure</a>. Long-term, this can put an extra burden on your heart and blood vessels, so you should consult your doctor before adding too much sodium to your diet, as it may increase the chances of other cardiovascular conditions.</p>	<p><a href="https://www.thehealthsite.com/diseases-conditions/first-aid-for-low-blood-pressure-b1215-356404/">https://www.thehealthsite.com/diseases-conditions/first-aid-for-low-blood-pressure-b1215-356404/</a></p>
<p>&lt;h1&gt;3. Take adequate salt</p>	<p><a href="#">Oral rehydration salts or ORS not only rehydrates the body but also supplies salt and other electrolytes, which helps in</a></p>	
<p>Try eating more salty foods or licking a pinch of salt to let the <a href="#">sodium raise your blood pressure</a>. You can also drink sports drinks or take oral rehydration salts (ORS) which can rehydrate you and <a href="#">provide salt as well as other electrolytes</a> to improve your blood</p>		

Above is the **editing process of our original articles:**

**Our team created all the articles by ourselves with the detailed reference information as shown right**

## Article 5


## Our Copyrighted Work

## Infringement

**100% plagiarized copyrighted in-app articles deliberately without any changes**

18:38 19%

### First Aid Tips for Hypertensive Crisis



There may be cases where blood pressure shoots up unexpectedly (systolic blood pressure reaching 180 and/or diastolic one reaching 120 mmHg) and emergency care is required. After calling for immediate medical service or during your waiting for the ambulance, what can be the first aid? No worries, we have prepared all the know-how for you.

#### 1. Calm yourself down benefits blood pressure lowering

One thing all hypertension patients need to keep in mind is that lower stress means lower blood pressure. Researchers have found that relaxing fully for a few minutes can decrease systolic blood pressure by 10 mmHg or more. Thus, it is the most natural way to lower your blood pressure during hypertensive urgency. Below are some

**Slide to see the complete text**

18:36 19%

### First Aid Tips for Hypertensive Crisis

There may be cases where blood pressure shoots up unexpectedly (systolic blood pressure reaching 180 and/or diastolic one reaching 120 mmHg) and emergency care is required. After calling for immediate medical service or during your waiting for the ambulance, what can be the first aid? No worries, we have prepared all the know-how for you.

#### 1. Calm yourself down benefits blood pressure lowering

One thing all hypertension patients need to keep in mind is that lower stress means lower blood pressure. Researchers have found that relaxing fully for a few minutes can decrease systolic blood pressure by 10 mmHg or more. Thus, it is the most natural way to lower your blood pressure during hypertensive urgency. Below are some relaxation tips you can try:

- Stop your current task
- Take deep breaths
- Sit down or lie flat

**Slide to see the complete text**

**Original Article****First Aid Tips for Hypertensive Crisis**

There may be cases where blood pressure shoots up unexpectedly (systolic blood pressure reaching 180 and/or diastolic one reaching 120 mmHg) and emergency care is required. After calling for immediate medical service or during your waiting for the ambulance, what can be the first aid? No worries, we have prepared all the know-how for you.

## &lt;h1&gt;1. Calm yourself down benefits blood pressure lowering

One thing all hypertension patients need to keep in mind is that lower stress means lower blood pressure. [Researchers have found that relaxing fully for a few minutes can decrease systolic blood pressure by 10 mmHg or more.](#) Thus, it is the most natural way to lower your blood pressure during hypertensive urgency. Below are some relaxation tips you can try:

- [Stop your current task](#)
- [Take deep breaths](#)
- [Sit down or lie flat](#)
- Listen to relaxing sounds
- Meditate

## &lt;h1&gt;2. Take your blood pressure medication

If you are a hypertension patient, you [must have blood pressure medicines that the doctor has prescribed for you.](#) Medication is the main option for treating high blood pressure. Therefore, if you or your family members experience a hypertensive emergency, never forget to take medical treatment as soon as possible.

## &lt;h1&gt;3. Sip a cup of hibiscus tea

**Reference**

"If you have high blood pressure (hypertension), without any complications, [the first thing to do is to calm down and lie flat.](#) Leave aside the task you were engaged in and slowly start taking deep breaths. This stress-relieving technique helps to bring down the blood pressure to a certain extent. Additionally, do not forget to take your antihypertensive medications for blood pressure that is uncontrolled by lifestyle changes and diet."

For some people, medication — in addition to lifestyle changes — is necessary to get blood pressure to a healthy level. Even so, stress management can be a helpful addition. In fact, a randomized, controlled trial of older adults showed that an [eight-week program of relaxation response plus other stress management techniques lessened the amount of medication some of the participants needed to control their blood pressure.](#) Fully relaxing your body and your mind for a few minutes a day could [lower your systolic blood pressure \(the top number of a blood pressure reading\) by 10 points or more](#)—at no cost, and with no side effects.

"If you have temporary high blood pressure from exercise, stress or excitement, you can lower your blood pressure fast by returning your body to a calm state. Since stress can also trigger unhealthy habits, such as overeating or poor sleep, which contribute to high blood pressure, [reducing stress can help lower high blood pressure naturally.](#)"

[Take your blood pressure medication if your doctor has prescribed something for you.](#)

**Reference Website**

[https://www.medicinenet.com/how\\_to\\_lower\\_my\\_blood\\_pressure\\_immediately/article.htm](https://www.medicinenet.com/how_to_lower_my_blood_pressure_immediately/article.htm)

<https://www.health.harvard.edu/mind-and-mood/lower-stress-lower-your-blood-pressure>

<https://piedmonthealth.org/relax-your-way-to-lower-blood-pressure/#:~:text=Fully%20relaxing%20your%20body%20and,and%20with%20no%20side%20effects.>

<https://www.healthgrades.com/right-care/high-blood-pressure/how-can-you-lower-high-blood-pressure-immediately>

<https://www.adityabirlacapital.com/healthinsuranc/active-together/2020/06/24/lower-blood-pressure-in-emergency/>

<https://www.adityabirlacapital.com/healthinsuranc/active-together/2020/06/24/lower-blood-pressure-in-emergency/>

<https://www.thedailymeal.com/healthy-eating/best-tea-lower-blood-pressure>

<https://www.webmd.com/heart/news/20081110/hibiscus-tea-may-cut-blood-pressure>

<https://www.livestrong.com/article/464240-chamomile-tea-and-blood-pressure/>

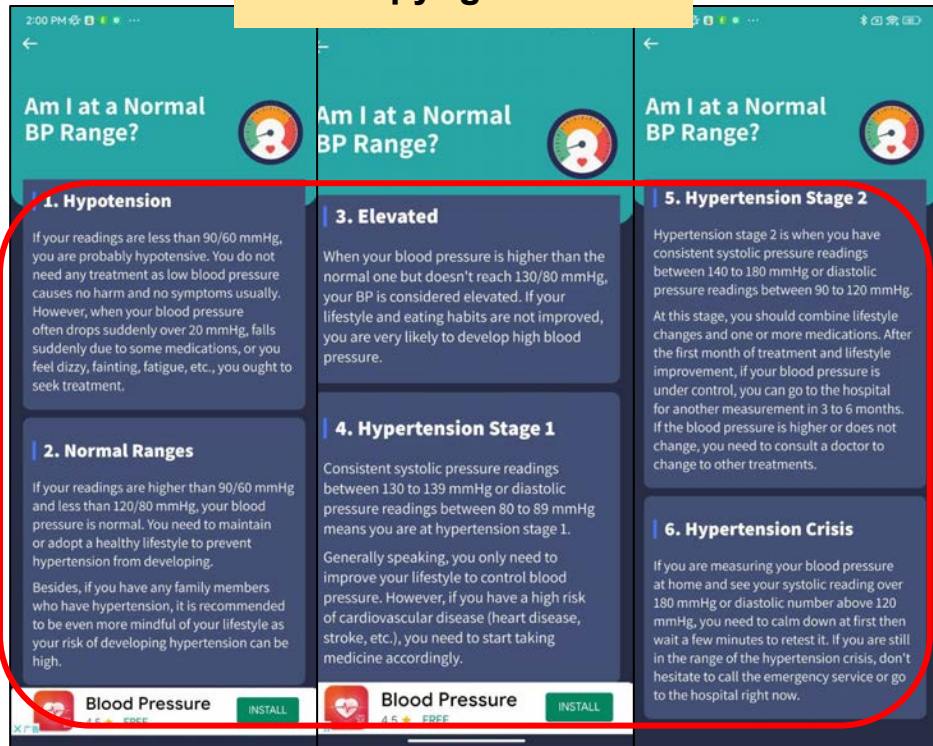
<https://www.webmd.com/hypertension-high-blood-pressure/news/20070703/dark-chocolate-may-help-blood-pressure>

<https://pumpingmarvellous.org/dark-chocolate>

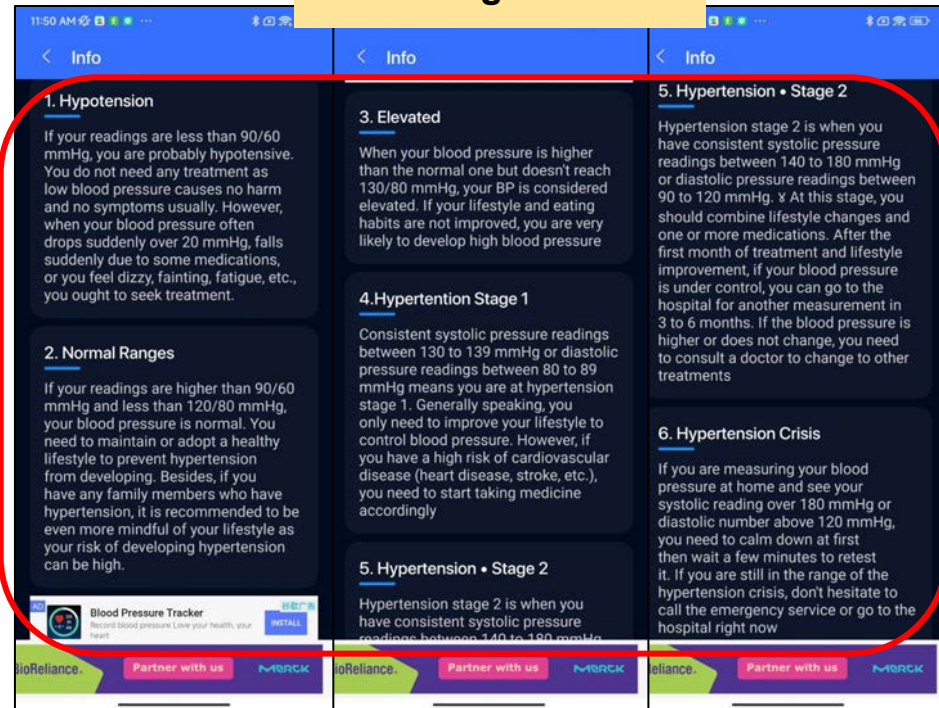
**Above is the editing process of our original articles:**  
**Our team created all the articles by ourselves with the detailed reference information as shown right**



## Our Copyrighted Work



## Infringement



100% plagiarized copyright in-app articles deliberately without any changes

# Proof of Originality

## Original Article

Am I at a normal BP range?	Reference	Reference Website
<p>What range can be determined as hypertension? If one of your readings reaches the standard for high blood pressure, but the other one does not, how to determine that? To define your blood pressure numbers, you can see the blood pressure category below.</p> <p>&lt;h1&gt;1. Hypotension</p> <p>If your readings are less than 90/60 mmHg, you are probably hypotensive. You do not need any treatment as low blood pressure <b>causes no harm and no symptoms usually</b>. However, when your blood pressure often <b>drops suddenly over 20 mmHg</b>, falls suddenly due to some medications, or you feel <b>dizzy, fainting, fatigue</b>, etc., you ought to seek treatment.</p> <p>&lt;h1&gt;2. Normal Ranges</p> <p>If your readings are higher than 90/60 mmHg and less than 120/80 mmHg, your blood pressure is normal. You need to maintain or adopt a healthy lifestyle to prevent hypertension from developing.</p> <p>Besides, if you have any family members who have hypertension, it is recommended to be even more mindful of your lifestyle as your risk of developing hypertension can be high.</p> <p>&lt;h1&gt;3. Elevated</p> <p>When your blood pressure is <b>higher than the normal one but doesn't reach 130/80 mmHg</b>, your BP is considered elevated. If your lifestyle and eating habits are not improved, <b>you are very likely to develop high blood pressure</b>.</p>	<p>When you get your blood pressure numbers, there are two of them. The first, or "top" one, is your systolic blood pressure. The second, or "bottom," one is diastolic blood pressure. Knowing both is important and could save your life.</p> <p>The top number refers to the amount of pressure in your arteries during the contraction of your heart muscle. This is called systolic pressure.</p> <p>The bottom number refers to your blood pressure when your heart muscle is between beats. This is called diastolic pressure.</p> <p>A sudden fall in blood pressure can be dangerous. A change of just 20 mm Hg — a drop from 110 systolic to 90 mm Hg systolic, for example — can cause dizziness and fainting when the brain fails to receive enough blood. And big drops, such as those caused by uncontrolled bleeding, severe infections or allergic reactions, can be life-threatening.</p> <p>Low blood pressure is a reading of less than 90/60mmHg. It does not always cause symptoms, but you may need treatment if it does.</p> <p>Elevated blood pressure means that your blood pressure is slightly above what is considered normal. Some doctors refer to slightly elevated blood pressure as prehypertension. Elevated blood pressure will likely turn into high blood pressure (hypertension) unless you make lifestyle changes, such as getting more exercise and eating healthier foods.</p> <p>Anyone can have elevated blood pressure, even children, especially if they're overweight or obese.</p>	<p><a href="https://www.webmd.com/hypertension-high-blood-pressure/guide/diastolic-and-systolic-blood-pressure">https://www.webmd.com/hypertension-high-blood-pressure/guide/diastolic-and-systolic-blood-pressure</a></p> <p><a href="https://www.healthline.com/health/high-blood-pressure-hypertension/blood-pressure-ranges">https://www.healthline.com/health/high-blood-pressure-hypertension/blood-pressure-ranges</a></p> <p><a href="https://www.mayoclinic.org/diseases-conditions/low-blood-pressure/symptoms-causes/syc-20355465#:~:text=Most%20doctors%20consider%20blood%20pressure,blood%20pressure%20can%20be%20dangerous.">https://www.mayoclinic.org/diseases-conditions/low-blood-pressure/symptoms-causes/syc-20355465#:~:text=Most%20doctors%20consider%20blood%20pressure,blood%20pressure%20can%20be%20dangerous.</a></p> <p><a href="https://www.nhs.uk/conditions/low-blood-pressure-hypotension/">https://www.nhs.uk/conditions/low-blood-pressure-hypotension/</a></p> <p><a href="https://www.mayoclinic.org/diseases-conditions/prehypertension/symptoms-causes/syc-20376703">https://www.mayoclinic.org/diseases-conditions/prehypertension/symptoms-causes/syc-20376703</a></p>

Above is the **editing process of our original articles:**

**Our team created all the articles by ourselves with the detailed reference information as shown right**



## App Release Date

### Our Copyright Work

#### About

**Category:** Health & Fitness

**Initial Release Date:** Nov 17, 2021

**Worldwide Release Date:** Nov 17, 2021

**Last Updated Time:** Nov 27, 2022

**Version:** 1.4.4

**Size:** 7.86 mb

**Content Rating:** Rated for 3+

**Requirement:** 5.0

**Contains Ads:** Yes

**Package name:** bloodpressure.bloodpressureapp.bloodpressuretracker

### Infringement

#### About

**Category:** Health & Fitness

**Initial Release Date:** Sep 26, 2022

**Worldwide Release Date:** Oct 2, 2022

**Last Updated Time:** Nov 27, 2022

**Version:** 2022.11.24

**Company HQ:** Vietnam

**Content Rating:** Rated for 3+

**Contains Ads:** Yes

**Package name:** com.bloodpressure.tracker.app.bpmonitor.bptracker



**Our Copyright Work**

*More Evidence Can be Provided If Needed*

I have a good faith belief that use of the copyrighted materials described above as allegedly infringing is not authorized by the copyright owner, its agent, or the law.

**Please check to confirm**

The information in this notification is accurate and I swear, under penalty of perjury, that I am the copyright owner or am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

**Please check to confirm**

I understand that a copy of the notice may be sent to the developer of the affected content.

**Please check to confirm**

Signature

Ada Lee

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**I. (a) PLAINTIFFS** ( Check box if you are representing yourself ☐ )

AKRURA PTE. LTD., a Singapore company

**DEFENDANTS** ( Check box if you are representing yourself ☐ )

APEROT TECHNOLOGIES GROUP, a Vietnam company, et al.

(b) County of Residence of First Listed Plaintiff

(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY)

(c) Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.

Zheng Liu, Esq. (SBN: 229311)  
Rimon, P.C.  
800 Oak Grove Avenue, Suite 250  
Menlo Park, CA 94025 (t) 650-382-4546; (f) 650-461-4433; zheng.liu@rimonlaw.com

Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.

**II. BASIS OF JURISDICTION** (Place an X in one box only.)

- ☐ 1. U.S. Government Plaintiff
- ☒ 3. Federal Question (U.S. Government Not a Party)
- ☐ 2. U.S. Government Defendant
- ☐ 4. Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES**-For Diversity Cases Only  
(Place an X in one box for plaintiff and one for defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in this State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. ORIGIN** (Place an X in one box only.)

- ☒ 1. Original Proceeding ☐ 2. Removed from State Court ☐ 3. Remanded from Appellate Court ☐ 4. Reinstated or Reopened ☐ 5. Transferred from Another District (Specify) ☐ 6. Multidistrict Litigation - Transfer ☐ 8. Multidistrict Litigation - Direct File

**V. REQUESTED IN COMPLAINT: JURY DEMAND:** ☒ Yes ☐ No (Check "Yes" only if demanded in complaint.)**CLASS ACTION under F.R.Cv.P. 23:** ☐ Yes ☒ No **MONEY DEMANDED IN COMPLAINT: \$****VI. CAUSE OF ACTION** (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)  
Federal Copyright Infringement – 17 U.S.C § 501, et seq., Federal Unfair Competition – Lanham Act Section 43(a), 15 U.S.C § 1125, California Unfair Competition – California Business & Professions Code §1 7200, et seq.**VII. NATURE OF SUIT** (Place an X in one box only.)

OTHER STATUTES	CONTRACT	REAL PROPERTY CONT.	IMMIGRATION	PRISONER PETITIONS	PROPERTY RIGHTS
<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust  <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/Etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced & Corrupt Org. <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.) <input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise  <b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property  <b>TORTS</b> <b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions  <b>TORTS</b> <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability  <b>BANKRUPTCY</b> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157  <b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 American with Disabilities-Employment <input type="checkbox"/> 446 American with Disabilities-Other <input type="checkbox"/> 448 Education	<b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty  <b>Other:</b> <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee Conditions of Confinement  <b>FORFEITURE/PENALTY</b> <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other  <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Ret. Inc. Security Act	<input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 (DTSA)  <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405 (g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405 (g))  <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

**FOR OFFICE USE ONLY:**

Case Number:

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**

**VIII. VENUE:** Your answers to the questions below will determine the division of the Court to which this case will be initially assigned. This initial assignment is subject to change, in accordance with the Court's General Orders, upon review by the Court of your Complaint or Notice of Removal.

<b>QUESTION A: Was this case removed from state court?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," skip to Question B. If "yes," check the box to the right that applies, enter the corresponding division in response to Question E, below, and continue from there.	STATE CASE WAS PENDING IN THE COUNTY OF:		INITIAL DIVISION IN CACD IS:
	<input type="checkbox"/> Los Angeles, Ventura, Santa Barbara, or San Luis Obispo		Western
	<input type="checkbox"/> Orange		Southern
	<input type="checkbox"/> Riverside or San Bernardino		Eastern

<b>QUESTION B: Is the United States, or one of its agencies or employees, a PLAINTIFF in this action?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," skip to Question C. If "yes," answer Question B.1, at right.	<b>B.1.</b> Do 50% or more of the defendants who reside in the district reside in Orange Co.?  <i>check one of the boxes to the right</i> ➡	<input type="checkbox"/> YES. Your case will initially be assigned to the Southern Division. Enter "Southern" in response to Question E, below, and continue from there.  <input type="checkbox"/> NO. Continue to Question B.2.
<b>B.2.</b> Do 50% or more of the defendants who reside in the district reside in Riverside and/or San Bernardino Counties? (Consider the two counties together.)  <i>check one of the boxes to the right</i> ➡	<input type="checkbox"/> YES. Your case will initially be assigned to the Eastern Division. Enter "Eastern" in response to Question E, below, and continue from there.  <input type="checkbox"/> NO. Your case will initially be assigned to the Western Division. Enter "Western" in response to Question E, below, and continue from there.	

<b>QUESTION C: Is the United States, or one of its agencies or employees, a DEFENDANT in this action?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," skip to Question D. If "yes," answer Question C.1, at right.	<b>C.1.</b> Do 50% or more of the plaintiffs who reside in the district reside in Orange Co.?  <i>check one of the boxes to the right</i> ➡	<input type="checkbox"/> YES. Your case will initially be assigned to the Southern Division. Enter "Southern" in response to Question E, below, and continue from there.  <input type="checkbox"/> NO. Continue to Question C.2.
<b>C.2.</b> Do 50% or more of the plaintiffs who reside in the district reside in Riverside and/or San Bernardino Counties? (Consider the two counties together.)  <i>check one of the boxes to the right</i> ➡	<input type="checkbox"/> YES. Your case will initially be assigned to the Eastern Division. Enter "Eastern" in response to Question E, below, and continue from there.  <input type="checkbox"/> NO. Your case will initially be assigned to the Western Division. Enter "Western" in response to Question E, below, and continue from there.	

QUESTION D: Location of plaintiffs and defendants?	A. Orange County	B. Riverside or San Bernardino County	C. Los Angeles, Ventura, Santa Barbara, or San Luis Obispo County
Indicate the location(s) in which 50% or more of <i>plaintiffs who reside in this district</i> reside. (Check up to two boxes, or leave blank if none of these choices apply.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indicate the location(s) in which 50% or more of <i>defendants who reside in this district</i> reside. (Check up to two boxes, or leave blank if none of these choices apply.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>D.1. Is there at least one answer in Column A?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  If "yes," your case will initially be assigned to the SOUTHERN DIVISION.  Enter "Southern" in response to Question E, below, and continue from there.  If "no," go to question D2 to the right.      ➡	<b>D.2. Is there at least one answer in Column B?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  If "yes," your case will initially be assigned to the EASTERN DIVISION.  Enter "Eastern" in response to Question E, below.  If "no," your case will be assigned to the WESTERN DIVISION. Enter "Western" in response to Question E, below.      ↓
--	--

<b>QUESTION E: Initial Division?</b>	INITIAL DIVISION IN CACD
Enter the initial division determined by Question A, B, C, or D above: ➡	WESTERN

<b>QUESTION F: Northern Counties?</b>
Do 50% or more of plaintiffs or defendants in this district reside in Ventura, Santa Barbara, or San Luis Obispo counties? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No



UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**IX(a). IDENTICAL CASES:** Has this action been previously filed in this court?☒ NO☐ YES

If yes, list case number(s): \_\_\_\_\_

**IX(b). RELATED CASES:** Is this case related (as defined below) to any civil or criminal case(s) previously filed in this court?☒ NO☐ YES

If yes, list case number(s): \_\_\_\_\_

**Civil cases** are related when they (check all that apply):

- ☐ A. Arise from the same or a closely related transaction, happening, or event;
- ☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
- ☐ C. For other reasons would entail substantial duplication of labor if heard by different judges.

Note: That cases may involve the same patent, trademark, or copyright is not, in itself, sufficient to deem cases related.

**A civil forfeiture case and a criminal case** are related when they (check all that apply):

- ☐ A. Arise from the same or a closely related transaction, happening, or event;
- ☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
- ☐ C. Involve one or more defendants from the criminal case in common and would entail substantial duplication of labor if heard by different judges.

**X. SIGNATURE OF ATTORNEY****(OR SELF-REPRESENTED LITIGANT):** /s/ Zheng LiuDATE: 1/6/2023

**Notice to Counsel/Parties:** The submission of this Civil Cover Sheet is required by Local Rule 3-1. This Form CV-71 and the information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. For more detailed instructions, see separate instruction sheet (CV-071A).

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))