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November 18, 2025

VIA EDIS

The Honorable Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street, S.W., Room 112
Washington, D.C. 20436

Re: *In the Matter of Certain Low-Profile Microwave-Hood Combination Products*

Dear Secretary Barton:

Enclosed for filing on behalf of Complainant Whirlpool Corporation are the following documents in support of Whirlpool's request that the Commission institute an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337.

Please note that Confidential Exhibits 6C and 37C to the Complaint contain Confidential Business Information and, pursuant to the Commission's Rules of Practice and Procedure, a request for confidential treatment of the information in those exhibits accompanies this filing.

Accordingly, Whirlpool submits the following:

1. One (1) electronic copy of Whirlpool's Verified Complaint and Public Interest Statement, pursuant to Commission Rules 210.8(a)(1)(i) and 210.8(b);

2. One (1) electronic copy of the public exhibits to the Complaint, pursuant to Commission Rules 210.12(a)(9), including:

    a. One (1) electronic copy of the certified version of asserted U.S. Patent No. 8,712,540 (the "'540 patent") and U.S. Patent Nos. 11,079,118 ("the '118 Patent"); U.S. Patent No. 11,979,967 ("the '967 Patent"); U.S. Patent No. 12,101,865 ("the '865 Patent"); U.S. Patent No. 12,133,317, ("the '317 Patent"); and U.S. Patent No. 12,289,819 B2, ("the '819 Patent") (collectively, the "Asserted Patents"), identified as Exhibits 1-5 in the Complaint, pursuant to Commission Rule 210.12(a)(9)(i); and

    b. One (1) electronic copy of the certified version of the assignment records for the Asserted Patents, identified as Exhibits 7-8 in the Complaint, pursuant to Commission Rule 210.12(a)(9)(ii);

3. One (1) electronic copy of the public versions of Confidential Exhibits 6C and 37C to the Complaint, pursuant to Commission Rules 201.6(b)(3)(v);

4. One (1) electronic copy of the certified prosecution histories of each of the Asserted Patents, included as Appendices A, C, E, G, and I to the Complaint, pursuant to Commission Rule 210.12(c)(1);

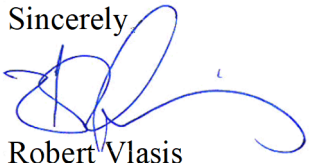
5. One (1) electronic copy of the prosecution history of Provisional U.S. Patent Application No. 62/321,283, pursuant to Commission Rule 210.12(c)(2);

6. One (1) electronic copy of each of the patents and applicable pages of each technical reference identified in the prosecution histories of the Asserted Patents, included as Appendices B, D, F, H, and J to the Complaint; and

7. A letter and certification requesting confidential treatment of the information contained in Confidential Exhibits 6C and 37C, pursuant to Commission Rule 201.6(b) and 210.5(d).

Please feel free to contact me with any questions regarding this submission. Thank you for your attention to this matter.

Sincerely,



Robert Vlasis

Counsel for Complainant
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The Honorable Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street, S.W., Room 112
Washington, D.C. 20436

Re: *In the Matter of Certain Low-Profile Microwave-Hood Combination Products*

Dear Secretary Barton:

In accordance with 19 C.F.R. §§ 201.6(b) and 210.5(d), Complainant Whirlpool Corporation requests confidential treatment for the business information contained in Confidential Exhibits 6C and 37C to the Verified Complaint.

The information for which confidential treatment is sought is proprietary commercial information not otherwise publicly available. Specifically, Confidential Exhibit 6C contains confidential business and financial information relating to Whirlpool's domestic industry for its products and commercial operations. Confidential Exhibit 37C identifies Whirlpool's confidential supply agreements.

The information described above qualifies as confidential business information pursuant to Rule 201.6(a) because:

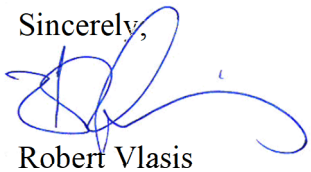
1. It is proprietary and not publicly available;

2. Unauthorized disclosure of such information could cause substantial harm to the competitive position of Whirlpool; and

3. The disclosure of such information could impair the Commission's ability to obtain information necessary to perform it statutory function.

Accordingly, Whirlpool respectfully requests confidential treatment. Please feel free to contact me with any questions regarding this submission. Thank you for your attention to this matter.

Sincerely,



Robert Vlasis

Counsel for Complainant
Whirlpool Corporation

UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

In the Matter of **CERTAIN LOW-PROFILE MICROWAVE-HOOD COMBINATION PRODUCTS**	**Inv. No. 337-TA-____**

COMPLAINANTS' STATEMENT REGARDING THE PUBLIC INTEREST

I. INTRODUCTION

Complainant Whirlpool Corporation hereby submits this Statement Regarding the Public Interest under 19 C.F.R. § 210.8(b). As set forth below, the requested relief in the investigation would not affect the public health and welfare in the United States, competitive conditions in the United States economy, the production of like or directly competitive articles in the United States, or United States consumers.

The accused articles are low-profile microwave-hood combination products ("LP-MHCs") used for cooking and heating food and beverages. As kitchen appliances, the accused articles serve no unique or unmet public health, safety, or welfare need. Moreover, Whirlpool has the capacity to manufacture and replace the accused articles with its own like products in a commercially reasonable amount of time. Indeed, Whirlpool created the LP-MHC product category, and until the Proposed Respondents began their unlawful conduct, Whirlpool was the sole provider of LP-MHCs in the United States. Exclusion would thus restore the market to the status quo. Moreover, consumers will still have access to myriad cooking appliances, such as countertop microwave ovens.

Accordingly, the requested relief will not adversely impact the public health, safety, or welfare conditions in the United States, competitive conditions in the United States economy, the production of like or directly competitive articles in the United States, or United States consumers.

II. PUBLIC INTEREST FACTORS

A. How the Accused Articles Are Used in the United States

LP-MHCs are microwave ovens used to cook and heat food and beverages. The products are designed to fit into the undercabinet hood space above a cooking range, providing a two-in-one kitchen appliance that cooks and provides ventilation. LP-MHCs provide significantly scaled

down overall vertical dimensions (as compared to a traditional microwave), allowing for installation in areas that previously could only accommodate a standalone ventilation hood. The claimed invention practiced by the accused articles provides both robust air intake and expulsion of byproducts produced when using the cooking range below (e.g., smoke, steam, and/or grease) and cooling of the cooking area inside the LP-MHC. The claimed invention as practiced by the accused articles therefore saves countertop space without sacrificing performance, providing users with an efficient and innovative dual-function kitchen appliance.

B. The Requested Remedial Orders Will Not Adversely Impact the Public Health, Safety, or Welfare

If the accused articles are excluded, the proposed remedial orders will not adversely affect the public health, safety, or welfare. As kitchen appliances, the accused articles serve no unique or unmet public health, safety, or welfare need. And as set forth below, numerous alternative cooking appliances will remain available for consumers.

C. Whirlpool, the Proposed Respondents, and Third Parties Can Replace the Accused Articles with Like or Directly Competitive Articles

Numerous microwave ovens and other cooking appliances will remain available to replace the accused articles in the event of exclusion. First, Whirlpool's LP-MHCs will remain available to customers. As Whirlpool was the sole provider of LP-MHCs prior to the Proposed Respondents' infringement, the proposed remedies would simply restore the market to the pre-infringement status quo. As set forth in the Complaint, Whirlpool currently distributes in the United States twenty-five models of LP-MHCs, sold under the Whirlpool and KitchenAid brand names. Whirlpool also has additional LP-MHC models in development that could serve as replacements.

Second, although not directly substitutable given their size and dimensions, other cooking appliances such as countertop microwaves and built-in microwaves (*e.g.*, traditional-sized

microwaves built into cabinetry instead of over a range) will remain available from Whirlpool, the Proposed Respondents, and third parties. Indeed, the proposed remedies would not impact those models.

Thus, Whirlpool, the Proposed Respondents, and third parties can replace the accused articles with like or directly competitive articles in the event of exclusion.

D. Whirlpool Has the Capacity to Replace the Volume of Accused Articles in a Commercially Reasonable Time in the United States

In the event of exclusion, Whirlpool and its original equipment manufacturer would have the capacity to manufacture additional LP-MHCs to replace the accused articles. Whirlpool is not aware of any capacity constraints that would limit its ability to replace the accused articles promptly. Whirlpool was previously the sole provider of LP-MHCs and would return to being the sole provider should the accused articles be excluded.

E. The Requested Remedial Orders Would Not Adversely Impact Consumers

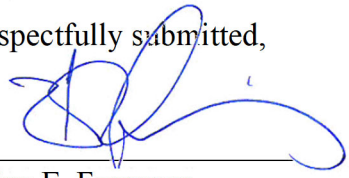
The proposed remedies would not adversely impact consumers. For consumers who have already purchased an accused article, they will continue to have access to those products. For consumers purchasing new LP-MHCs, ample supply will be available from Whirlpool. Consumers also have the option to purchase other types of microwaves, such as countertop microwaves and built-in microwaves. Thus, consumers will not be impacted by the proposed remedies.

III. CONCLUSION

For the reasons set forth above, the requested relief in the investigation would not affect the public health and welfare in the United States, competitive conditions in the United States economy, the production of like or directly competitive articles in the United States, or United States consumers.

Date: November 18, 2025

Respectfully submitted,



/s/

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UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

In the Matter of **CERTAIN LOW-PROFILE MICROWAVE-HOOD COMBINATION PRODUCTS**	**Inv. No. 337-TA-____**

VERIFIED COMPLAINT OF WHIRLPOOL CORPORATION UNDER SECTION 337 OF THE TARIFF ACT OF 1930, AS AMENDED

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2	U.S. Patent No. 11,979,967 (Certified Copy)
3	U.S. Patent No. 12,101,865 (Certified Copy)
4	U.S. Patent No. 12,133,317 (Certified Copy)
5	U.S. Patent No. 12,289,819 B2 (Certified Copy)
6C	Confidential Declaration of Ashley Kovalcik (Domestic Industry)
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9	Cosmo Website (https://cosmoappliances.com/contact-us/)
10	Meyer Website (https://meyerus.com/brands/farberware/)
11	Photographs of Midea Logos on Certain Accused Products
12	Whirlpool Website (https://ar.whirlpoolcorp.com/whirlpool-at-a-glance/)
13	Whirlpool Award (https://www.prnewswire.com/news-releases/whirlpool-corporations-innovative-design-wins-big-at-if-design-awards-300813555.html)
14	Excerpts of Midea Group 2023 Annual Report
15	Haier Website (https://www.haier.com/global/)
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83	Importation Receipt – Frigidaire, Samsung
84	Samsung Website (https://www.samsung.com/us/home-appliances/microwaves/over-the-range/?type=Over+the+range&shop=Buy+Online)
85	LG Website (https://www.lg.com/us/cooking-appliances/lg-mvef1323f-over-the-range-microwave)
86	Midea Website (https://www.midea.com/us/store/microwaves/over-the-range/midea-over-the-range-microwave.MMO12S3AST)
87	Cosmo Website (https://cosmoappliances.com/cos-3012orlp1ss-30-over-the-range-microwave-with-sensor-cooking/)
88	Koolmore Website (https://koolmore.com/products/over-the-range-low-profile-microwave-1-2-cu-ft?srsltid=AfmBOopfCVk-yoA_k7-kZX36AKjguytjwuVhALGQ7wFGJ3j3BfIBIcAu)
89	THOR Website (https://thorkitchen.com/products/30-inch-over-the-range-slim-microwave-with-ventilation-tor30l?srsltid=AfmBOopRsX546JCflPigN4YeGq pB7jPMzEvqRnNv3Wr1YO1KZZACNkCN)

90	Unique Website (https://uniqueappliances.com/en-us/products/unique-classic-otr-summer-mint-green)
91	Haier/GE Website (https://www.geappliances.com/appliance/1-2-Cu-Ft-Over-the-Range-Low-Profile-Sensor-Microwave-Oven-UVM9125STSS)
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D	U.S. Patent No. 11,979,967 – Cited References
E	U.S. Patent No. 12,101,865 – File History (Certified Copy)
F	U.S. Patent No. 12,101,865 – Cited References
G	U.S. Patent No. 12,133,317 – File History (Certified Copy)
H	U.S. Patent No. 12,133,317 – Cited References
I	U.S. Patent No. 12,289,819 B2 – File History (Certified Copy)
J	U.S. Patent No. 12,289,819 B2 – Cited References
K	Provisional U.S. Patent Application No. 62/321,283 – File History

I. INTRODUCTION

1. Complainant Whirlpool Corporation ("Whirlpool") respectfully requests that the U.S. International Trade Commission commence an Investigation under Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337, to remedy the unlawful importation into the United States, sale for importation into the United States, and/or sale within the United States after importation by the owner, importer, or consignee of certain low-profile microwave-hood combination products ("LP-MHCs") that infringe the asserted claims of valid and enforceable U.S. Patents owned by Whirlpool. The Asserted Patents are U.S. Patent No. 11,079,118 ("the '118 Patent"); U.S. Patent No. 11,979,967 ("the '967 Patent"); U.S. Patent No. 12,101,865 ("the '865 Patent"); U.S. Patent No. 12,133,317, ("the '317 Patent"); and U.S. Patent No. 12,289,819 B2, ("the '819 Patent"), each of which is entitled "Combination Microwave and Hood System."

2. On information and belief, proposed Respondents Samsung Electronics Co., Ltd. ("SEC") and Samsung Electronics America, Inc. ("SEA") (collectively, "Proposed Respondent Samsung"); LG Electronics Inc. ("LGE") and LG Electronics USA, Inc. ("LGUSA") (collectively, "Proposed Respondent LG"); Midea Group Co., Ltd. ("MGC") and Midea America Corporation ("MAC") (collectively, "Proposed Respondent Midea"); Haier Group Corporation ("HGC") and Haier US Appliance Solutions, Inc. d/b/a GE Appliances ("GE") (collectively, "Proposed Respondent Haier"); Electrolux Professional AB ("ABE") and Electrolux Consumer Products, Inc. ("ECP") (collectively, "Proposed Respondent Electrolux"); Cosmo Products, LLC ("Proposed Respondent Cosmo"); Meyer Corporation, U.S. ("Proposed Respondent Meyer"); Koolmore Supply, Inc. ("Proposed Respondent Koolmore"); THOR International d/b/a THOR Kitchen, Inc. ("Proposed Respondent THOR"); Unique Appliances Ltd. ("Proposed Respondent Unique"); and CTM Household Appliances Inc. d/b/a FORNO ("Proposed Respondent FORNO") (collectively, the "Proposed Respondents") have engaged in, and continue to engage

in, unfair acts in violation of Section 337 through and in connection with their unlicensed importation into the United States, sale for importation into the United States, and/or sale within the United States after importation of certain LP-MHCs that infringe one or more valid claims of the Asserted Patents.

3. The asserted claims of the Asserted Patents across all Proposed Respondents are identified below:

Patent	Asserted Claims
'118 Patent	1-5, 18
'967 Patent	1-5, 7-23
'865 Patent	1-21
'317 Patent	1-8
'819 Patent	1-30

4. Proposed Respondent Samsung directly and/or indirectly infringes, literally and/or under the doctrine of equivalents, at least the following claims:

Patent	Independent Claims	Dependent Claims
'118 Patent	1	2-5, 18
'967 Patent	1	2-5, 7-23
'865 Patent	1	2-21
'317 Patent	1	2-6, 8
'819 Patent	1, 30	2-23, 25-26, 28-29

5. Proposed Respondent LG directly and/or indirectly infringes, literally and/or under the doctrine of equivalents, at least the following claims:

Patent	Independent Claims	Dependent Claims
'317 Patent	1	2-6, 8
'819 Patent	1, 30	2-22, 24-29

6. On information and belief, Proposed Respondent Midea manufactures Accused Products on behalf of itself and on behalf of Proposed Respondents Haier, Cosmo, Meyer, Koolmore, THOR, Unique, and FORNO. On information and belief, and as explained in more detail below, each of the Accused Products of Proposed Respondents Midea, Haier, Cosmo,

Meyer, Koolmore, THOR, Unique, and FORNO are representative of each other for purposes of infringement. Thus, each of these Proposed Respondents directly and/or indirectly infringe, literally and/or under the doctrine of equivalents, at least the following claims:

Patent	Independent Claims	Dependent Claims
'819 Patent	1, 30	2-18, 21-22, 24-29

7. On information and belief, Proposed Respondent Midea manufactures Accused Products on behalf of Proposed Respondent Electrolux. Proposed Respondent Electrolux directly and/or indirectly infringes, literally and/or under the doctrine of equivalents, at least the following claims:

Patent	Independent Claims	Dependent Claims
'819 Patent	1, 30	2-12, 16-18, 21-22, 24-29

8. As required by Sections 337(a)(2) and 337(a)(3), an industry exists and/or is in the process of being established in the United States relating to the Asserted Patents at least by virtue of Whirlpool's significant investments in plant and equipment, significant employment of labor and capital, and/or substantial investment in exploitation through engineering and research and development. Further information is provided in the Confidential Declaration of Ashley Kovalcik that is attached to this Complaint as Confidential Exhibit 6C. Claim charts demonstrating how Whirlpool's articles practice claim 1 of the '118 Patent are attached as Exhibits 19-20. Claim charts demonstrating how Whirlpool's articles practice claim 1 of the '967 Patent are attached as Exhibits 21-22. Claim charts demonstrating how Whirlpool's articles practice claim 1 of the '865 Patent are attached as Exhibits 23-24. Claim charts demonstrating how Whirlpool's articles practice claim 1 of the '317 Patent are attached as Exhibits 25-27. Claim charts demonstrating how Whirlpool's articles practice claims 1 and 30 of the '819 Patent are attached as Exhibits 28-30.

9. Pursuant to Section 337(d), Whirlpool seeks a permanent limited exclusion order, excluding from entry into the United States the Proposed Respondents' LP-MHCs (collectively, the "Accused Products") that infringe one or more asserted claims of the Asserted Patents. Whirlpool also seeks a permanent cease and desist order, pursuant to Section 337(f), directed at U.S. activities including, but not limited to, assembling, manufacturing, importing, marketing, advertising, demonstrating, warehousing inventory for distribution, offering for sale, selling, distributing, or using such Accused Products. Whirlpool also seeks the imposition of a bond upon Proposed Respondents' importation of infringing articles into the United States during the 60-day Presidential review period pursuant to 19 U.S.C. § l337(j). Finally, Whirlpool seeks any other relief deemed proper by the Commission.

II. COMPLAINANT

10. Complainant Whirlpool Corporation is a Delaware corporation with its principal place of business at 2000 North M-63, Benton Harbor, MI 49022.

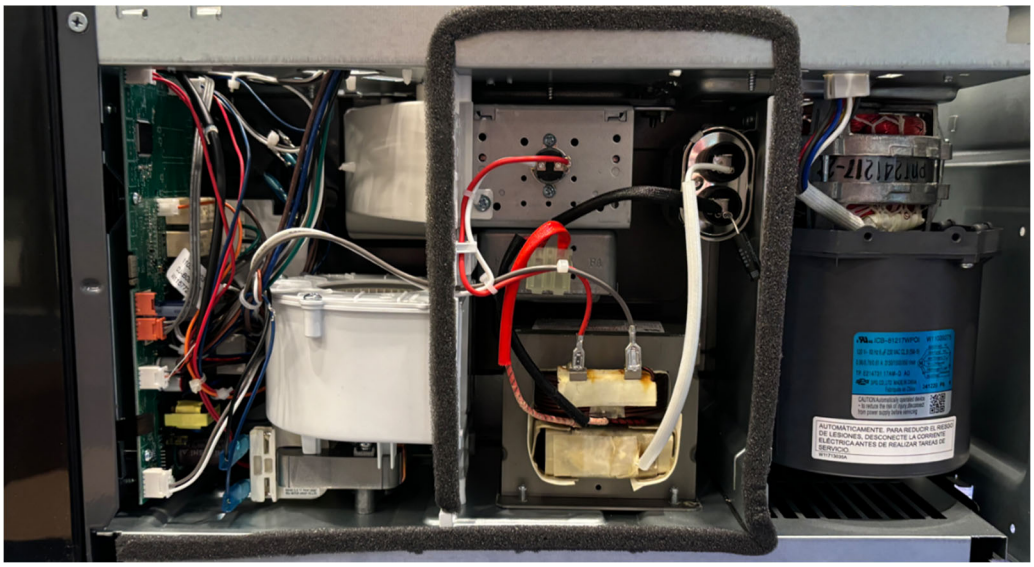
11. Whirlpool is a leading home appliance company dedicated to improving customers' quality of life at home through efficient, reliable, and innovative appliances. As the only major manufacturer of kitchen and laundry appliances based in the United States, nearly 90% of Whirlpool's 2024 sales occurred in the Americas. *See* Exhibit 12.

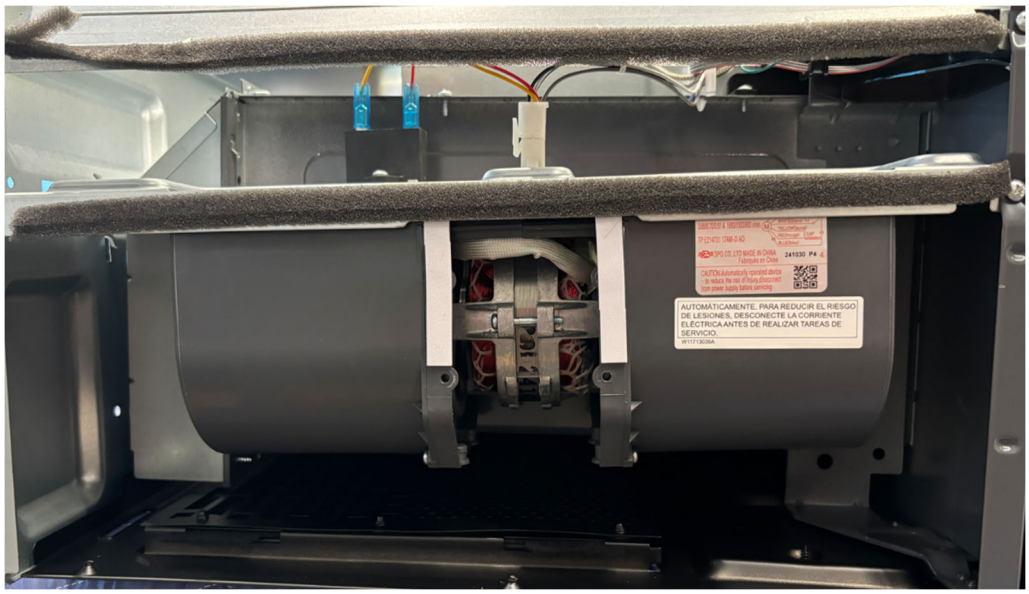
12. Among its areas of specialty, Whirlpool designs and manufactures kitchen appliances, including LP-MHCs. LP-MHCs are designed to fit into the undercabinet hood space above a cooking range, providing a two-in-one kitchen appliance with microwave and ventilation capabilities. Compared to their traditional counterparts, LP-MHCs have significantly scaled down overall vertical dimensions, allowing their installation in areas that previously could only accommodate a standalone ventilation hood. The benefit of this compact design is preserved through an LP-MHC's robust air circulation of byproducts produced when using the cooking

range below (e.g., smoke or grease). An LP-MHC's space-saving properties save countertop and cabinet space without sacrificing performance, providing users with an efficient and innovative kitchen appliance.

13. The below images show the exterior and certain interior components of an exemplary Whirlpool LP-MHC (Model No. WMML5530RZ) that practices the Asserted Patents:







See Exhibit 31.

14. The below image shows an exemplary Whirlpool LP-MHC installed over a range and demonstrates the space-saving nature of Whirlpool's innovative design:



See also Exhibit 6C (showing an exemplary Whirlpool LP-MHC installed over a range at Whirlpool's Experience Center at the World of Whirlpool ("WOW") Studios in Chicago, Illinois (Item No. 605).

15. Whirlpool invented the LP-MHC product category, which has expanded the availability of cooking appliances and enjoyed widespread commercial success. Whirlpool's creation of the LP-MHC product category was publicized in the industry and earned Whirlpool a 2019 iF Design Award. *See* Exhibit 13.

16. Whirlpool has also been awarded numerous patents for its innovative LP-MHCs, including the Asserted Patents. Whirlpool's LP-MHCs practice the claims of those patents.

III. PROPOSED RESPONDENTS

A. Proposed Respondent Samsung (SEC & SEA)

17. On information and belief, SEC is a corporation organized and existing under the laws of the Republic of Korea, with its principal place of business located at 129 Samsung-Ro, Yeoungtong-Gu, Suwon-si, Gyeonggi-do 16677, Republic of Korea. SEC is an electronics company providing consumer electronics, information technology, mobile communications, and device solutions. SEC's products include LP-MHCs, among other appliances.

18. On information and belief, SEA is a New York corporation, with its principal place of business located at 700 Sylvan Avenue, Englewood Cliffs, New Jersey, 07632. SEA is in the business of selling electronic devices in the United States, including LP-MHCs sold under the Samsung brand name and the Dacor brand name. On information and belief, SEC is the ultimate parent company of SEA.

19. On information and belief, SEA distributes in the United States the imported Samsung and Dacor-branded LP-MHCs accused of infringement in this Complaint.

20. On information and belief, SEA and SEC sell for importation into the United States, import into the United States, and/or sell in the United States after importation LP-MHCs manufactured in Malaysia and accused of infringement in this Complaint.

B. Proposed Respondent LG (LGE & LGEUS)

21. On information and belief, LGE is a corporation organized under the laws of Korea, with its principal place of business at LG Twin Tower 128, Yeoui-daero, Yeongdeungpo-gu, 07336, Seoul, South Korea. LGE is an electronics company in the business of providing various consumer products, business solutions, and mobility devices. LGE's products include LP-MHCs, among other appliances.

22. On information and belief, LGEUS is a corporation organized under the laws of the State of Delaware with a principal place of business located at 111 Sylvan Avenue, Englewood Cliffs, NJ 07632. LGEUS is in the business of selling electronic devices in the United States, including LP-MHCs sold under the LG brand name. On information and belief, LGE is the ultimate parent company of LGEUS.

23. On information and belief, LGEUS distributes in the United States the imported LG-branded LP-MHCs accused of infringement in this Complaint.

24. On information and belief, LGEUS and LGE sell for importation into the United States, import into the United States, and/or sell in the United States after importation LP-MHCs manufactured in China and accused of infringement in this Complaint.

C. Proposed Respondent Midea (MGC & MAC)

25. On information and belief, Proposed Respondent Midea manufactures, imports, and/or distributes in the United States LP-MHCs sold under the brand names of Midea, GE, Frigidaire/Electrolux, Cosmo, Farberware, Koolmore, Thor, Unique, and FORNO and that are accused of infringement in this Complaint. Exhibit 11 to the Complaint shows photographs of

the exteriors and interiors of LP-MHCs branded with the names of GE, Frigidaire/Electrolux, Cosmo, Farberware, Koolmore, Thor, Unique, and FORNO. As shown in Exhibit 11, the Midea logo is stamped on a printed circuit board inside each of these models. Thus, on information and belief, Proposed Respondent Midea manufactures the LP-MHCs distributed in the United States under the GE, Frigidaire/Electrolux, Cosmo, Farberware, Koolmore, Thor, Unique, and FORNO brand names, in addition to the Midea brand name.

26. On information and belief, MGC is a Chinese public company traded on the Shenzhen Stock Exchange, with its principal place of business at Midea Headquarters Building, No. 6 Midea Avenue, Beijiao Town, Shunde District, Foshan City, Guangdong Province, China 528311. MGC describes itself as "a leading global technology group comprising the Smart Home, Energy Solutions and Industrial Technology, Intelligent Building Technology, Robotics & Automation, and Other Innovation businesses." Exhibit 14 at 15. Relevant here, "Midea Smart Home primarily covers smart appliances," including the Midea LP-MHCs accused of infringement in this Complaint. *Id*.

27. On information and belief, MAC is a New Jersey corporation with its principal place of business at 300 Kimball Drive, Parsippany, NJ 07054. On information and belief, MAC is in the business of distributing appliances in the United States, including the Midea LP-MHCs accused of infringement in this case. On information and belief, MGC is the ultimate parent company of MAC.

28. On information and belief, MAC distributes in the United States the imported Midea-branded LP-MHCs accused of infringement in this Complaint.

29. On information and belief, MGC and MAC sell for importation into the United States, import into the United States, and/or sell in the United States after importation LP-MHCs manufactured in China and accused of infringement in this Complaint.

D. Proposed Respondent Haier (HGC & GE)

30. On information and belief, HGC is a Chinese corporation with its principal place of business at 1 Haier Road, Qingdao, Shandong 266101. HGC describes itself as "constructing IoT ecosystems, covering industries such as clothing, food, housing, transportation, health, medicine, and education." *See* Exhibit 15. On information and belief, HGC's products include appliances, including the GE-branded LP-MHCs accused of infringement in this Complaint.

31. On information and belief, Proposed Respondent GE is a Delaware corporation with its principal place of business at 4000 Buechel Bank Road, Louisville, KY 40225. Proposed Respondent GE describes itself as a "leading U.S. maker of home, kitchen, and laundry appliances & solutions." *See* Exhibit 16. On information and belief, HGC is the ultimate parent company of Proposed Respondent GE. *See* Exhibit 39 (showing Haier's acquisition of GE Appliances).

32. On information and belief, Proposed Respondent GE distributes in the United States the imported GE-branded LP-MHCs manufactured in China by Proposed Respondent Midea and that are accused of infringement in this Complaint.

33. On information and belief, HGC and GE sell for importation into the United States, import into the United States, and/or sell in the United States after importation LP-MHCs manufactured in China and accused of infringement in this Complaint.

E. Proposed Respondent Electrolux (ABE & ECP)

34. On information and belief, ABE is a Swedish corporation with its principal place of business at SE-105 45 in Stockholm, Sweden. ABE is a global appliance company that supplies LP-MHCs, among other appliances.

35. On information and belief, ECP is a Delaware corporation with its principal place of business at 10200 David Taylor Drive, Charlotte, NC, 28262. On information and belief, ABE is the ultimate parent company of ECP.

36. On information and belief, ECP distributes in the United States the Frigidaire/Electrolux-branded LP-MHCs manufactured in China by Proposed Respondent Midea and accused of infringement in this Complaint.

37. On information and belief, ABE and ECP sell for importation into the United States, import into the United States, and/or sell in the United States after importation LP-MHCs manufactured in China and accused of infringement in this Complaint.

F. Proposed Respondent Cosmo

38. On information and belief, Proposed Respondent Cosmo is a Nevada limited liability company with its principal place of business at 5075 Edison Avenue, Chino, CA, 91710. According to its website, "Cosmo makes luxury appliances accessible to all." *See* Exhibit 9. On information and belief, Proposed Respondent Cosmo distributes in the United States the Cosmo-branded LP-MHCs manufactured by Proposed Respondent Midea in China and accused of infringement in this Complaint.

39. On information and belief, Proposed Respondent Cosmo sells for importation into the United States, imports into the United States, and/or sells in the United States after importation LP-MHCs manufactured by Midea in China and accused of infringement in this Complaint.

G. Proposed Respondent Meyer

40. On information and belief, Proposed Respondent Meyer is a Delaware corporation with its principal place of business at 1 Meyer Plaza, Vallejo, CA 94590. On information and belief, Proposed Respondent Meyer distributes a variety of appliances and cookware in the United States. According to its website, Proposed Respondent Meyer owns the Farberware brand. *See* Exhibit 10. Thus, on information and belief, Proposed Respondent Meyer distributes in the United States the accused Farberware-branded LP-MHCs manufactured in China by Proposed Respondent Midea and accused of infringement in this Complaint.

41. On information and belief, Proposed Respondent Meyer sells for importation into the United States, imports into the United States, and/or sells in the United States after importation LP-MHCs manufactured in China and accused of infringement in this Complaint.

H. Proposed Respondent Koolmore

42. On information and belief, Proposed Respondent Koolmore is a New York corporation with its principal place of business at 706 Eastern Pkwy # 1G, Brooklyn, NY 11213. Proposed Respondent Koolmore distributes a variety of residential and commercial appliances in the United States. On information and belief, Proposed Respondent Koolmore distributes in the United States the Koolmore-branded LP-MHCs manufactured in China by Proposed Respondent Midea and accused of infringement in this Complaint.

43. On information and belief, Proposed Respondent Koolmore sells for importation into the United States, imports into the United States, and/or sells in the United States after importation LP-MHCs manufactured in China and accused of infringement in this Complaint.

I. Proposed Respondent THOR

44. On information and belief, Proposed Respondent THOR is a California corporation with its principal place of business at 4651 E. Airport Drive, Ontario, CA 91761.

Proposed Respondent THOR distributes a variety of residential and professional-grade appliances in the United States. On information and belief, Proposed Respondent THOR distributes in the United States the THOR-branded LP-MHCs manufactured in China by Proposed Respondent Midea and accused of infringement in this Complaint.

45. On information and belief, Proposed Respondent THOR sells for importation into the United States, imports into the United States, and/or sells in the United States after importation LP-MHCs manufactured in China and accused of infringement in this Complaint.

J. Proposed Respondent Unique

46. On information and belief, Proposed Respondent Unique is a Canadian company with its principal place of business at 2245 Wyecroft Road, Oakville, ON, Canada L6L 5L7. Proposed Respondent Unique distributes a variety of appliances in the United States. On information and belief, Proposed Respondent Unique distributes in the United States the Unique-branded LP-MHCs manufactured in China by Proposed Respondent Midea and accused of infringement in this Complaint.

47. On information and belief, Proposed Respondent Unique sells for importation into the United States, imports into the United States, and/or sells in the United States after importation LP-MHCs manufactured in China and accused of infringement in this Complaint.

K. Proposed Respondent FORNO

48. On information and belief, Proposed Respondent FORNO is a Canadian corporation with its principal place of business at 11420 Albert-Hudon, Montreal (Quebec) H1G 3J5. On information and belief, Proposed Respondent FORNO distributes a variety of appliances in the United States. On information and belief, Proposed Respondent FORNO distributes in the United States the FORNO-branded LP-MHCs manufactured in China by Proposed Respondent Midea and accused of infringement in this Complaint.

49. On information and belief, Proposed Respondent FORNO sells for importation into the United States, imports into the United States, and/or sells in the United States after importation LP-MHCs manufactured in China and accused of infringement in this Complaint.

IV. PLAIN ENGLISH STATEMENT OF THE CATEGORY OF ACCUSED PRODUCTS[1]

50. Under Commission Rules 210.10(b)(1) and 210.12(a)(12), the category of Accused Products is "low-profile, microwave oven and ventilation-hood combination products for installation over a cooking range or cooktop."

V. THE ASSERTED PATENTS

A. THE '118 PATENT

1. Identification of Patent Ownership and Licensing

51. The '118 Patent issued on August 3, 2021, to inventors Owen Zhang, Michael Ledford, Stephen Zheng, and Xiangxu Liu. As required by Commission Rule 210.12(a)(9)(i), a certified copy of the '118 Patent is attached to the Complaint as Exhibit 1.

52. Whirlpool owns by assignment the entire right, title, and interest to and in the '118 Patent. As required by Commission Rule 210.12(a)(9)(ii), a certified copy of the assignment records for the '118 Patent is attached as Exhibit 7.

53. As required by Commission Rule 210.12(c)(1), a certified copy of the prosecution history for the '118 Patent has been submitted with this Complaint as Appendix A. Copies of the cited references for the '118 Patent have been submitted with this Complaint as Appendix B.

54. The '118 Patent has 20 claims, 3 independent claims and 17 dependent claims.

[1] This Complaint, including this section, does not, and is not intended to, construe or limit the scope or meaning of any Asserted Patent claim.

55. As required by Commission Rule 210.12(a)(9)(iii), a list of licenses involving the '118 Patent is attached as Confidential Exhibit 37C. Whirlpool additionally has various intercompany agreements between affiliated companies that provide for the use of Whirlpool Corporation intellectual property.

2. Non-Technical Description of the Invention[2]

56. The '118 Patent generally relates to an LP-MHC designed to fit into the undercabinet hood space above a cooking range, providing a two-in-one kitchen appliance with microwave and ventilation capabilities. The '118 Patent claims an LP-MHC designed in a way that provides significantly scaled down overall vertical dimensions (as compared to a traditional microwave), allowing for installation in areas that previously could only accommodate a standalone ventilation hood. The claimed invention provides both robust air intake and expulsion of byproducts produced when using the cooking range below (e.g., smoke, steam, and/or grease) and cooling of the cooking area inside the LP-MHC. The claimed invention therefore saves countertop space without sacrificing performance, providing users with an efficient and innovative dual-function kitchen appliance.

3. Foreign & Domestic Counterparts

57. Pursuant to Commission Rule 210.12(a)(9)(v), the '118 Patent issued from U.S. Patent Application No. 16/090,440, filed on April 11, 2017, which claims the benefit of Provisional U.S. Patent Application No. 62/321,283, filed on April 12, 2016. The following additional patent applications correspond to the '118 Patent: U.S. Patent Application No. 19/006,773, filed on February 28, 2025; U.S. Patent Application No. 18/312,925 filed on May 5,

[2] This Complaint, including this section, does not, and is not intended to, construe or limit the scope or meaning of the '118 Patent or any of its claims.

2023. The status of these applications is currently pending. As required by Commission Rule 210.12(c)(ii), a copy of the file history for Provisional U.S. Patent Application No. 62/321,283 is attached as Appendix K.

58. Pursuant to Commission Rule 210.12 (a)(9)(v), only the following foreign patent application corresponds to the ’118 Patent:

Patent/Application	Publication Date
WO2017177890	Published October 19, 2017

4. Expiration Date

59. The ’118 Patent expires on September 15, 2037.

B. THE ’967 PATENT

1. Identification of Patent Ownership and Licensing

60. The ’967 Patent issued on May 7, 2024, to inventors Owen Zhang, Michael Ledford, Stephen Zheng, and Xiangxu Liu. As required by Commission Rule 210.12(a)(9)(i), a certified copy of the ’967 Patent is attached as Exhibit 2.

61. Whirlpool owns by assignment the entire right, title, and interest to and in the ’967 Patent. Under Commission Rule 210.12(a)(9)(ii), Whirlpool states that the ’967 Patent is a continuation patent and does not have a separately recorded assignment record at the U.S. Patent & Trademark Office (PTO).

62. As required by Commission Rule 210.12(c)(1), a certified copy of the prosecution history for the ’967 Patent has been submitted with this Complaint as Appendix C. Copies of the cited references for the ’967 Patent have been submitted with this Complaint as Appendix D.

63. The ’967 Patent has 24 claims, 1 independent claim and 23 dependent claims.

64. As required by Commission Rule 210.12(a)(9)(iii), a list of licenses involving the ’967 Patent is attached as Confidential Exhibit 37C. Whirlpool additionally has various

intercompany agreements between affiliated companies that provide for the use of Whirlpool Corporation intellectual property.

2. Non-Technical Description of the Invention[3]

65. The ’967 Patent generally relates to an LP-MHC designed to fit into the undercabinet hood space above a cooking range, providing a two-in-one kitchen appliance with microwave and ventilation capabilities. The ’967 Patent claims an LP-MHC designed in a way that provides significantly scaled down overall vertical dimensions (as compared to a traditional microwave), allowing for installation in areas that previously could only accommodate a standalone ventilation hood. The claimed invention provides both robust air intake and expulsion of byproducts produced when using the cooking range below (e.g., smoke, steam, and/or grease) and cooling of the cooking area inside the LP-MHC. The claimed invention therefore saves countertop space without sacrificing performance, providing users with an efficient and innovative dual-function kitchen appliance.

3. Foreign & Domestic Counterparts

66. Pursuant to Commission Rule 210.12 (a)(9)(v), the ’967 Patent issued from U.S. Patent Application No. 18/312,903, filed on May 5, 2023, which is a continuation of U.S. Patent Application No. 18/073,694, filed on December 2, 2022, now the ’317 Patent, which is a continuation of U.S. Patent Application No. 16/265,432, filed on February 1, 2019, now U.S. Pat. No. 11,523,473, which is a continuation-in-part of application No. 16/090,440, filed as application No. PCT/CN2017/080048 on April 11, 2017, now the ’118 Patent, and claims the benefit of Provisional U.S. Patent Application No. 62/321,283, filed on April 12, 2016.

[3] This Complaint, including this section, does not, and is not intended to, construe or limit the scope or meaning of the ’967 Patent or any of its claims.

67. Pursuant to Commission Rule 210.12 (a)(9)(v), only the following foreign patent application corresponds to the ’967 Patent:

Patent/Application	Publication Date
WO2017177890	Published October 19, 2017

4. Expiration Date

68. The ’967 Patent expires on April 11, 2037.

C. THE ’865 PATENT

1. Identification of Patent Ownership and Licensing

69. The ’865 Patent issued on September 24, 2024, to inventors Owen Zhang, Michael Ledford, Stephen Zheng, and Xiangxu Liu. As required by Commission Rule 210.12(a)(9)(i), a certified copy of the ’865 Patent is attached as Exhibit 3.

70. Whirlpool owns by assignment the entire right, title, and interest to and in the ’865 Patent. Under Commission Rule 210.12(a)(9)(ii), Whirlpool states that the ’865 Patent is a continuation patent and does not have a separately recorded assignment record at the PTO.

71. As required by Commission Rule 210.12(c)(1), a certified copy of the prosecution history for the ’865 Patent has been submitted with this Complaint as Appendix E. Copies of the cited references for the ’865 Patent have been submitted with this Complaint as Appendix F.

72. The ’865 Patent has 22 claims, 1 independent claim and 21 dependent claims.

73. As required by Commission Rule 210.12(a)(9)(iii), a list of licenses involving the ’865 Patent is attached as Confidential Exhibit 37C. Whirlpool additionally has various intercompany agreements between affiliated companies that provide for the use of Whirlpool Corporation intellectual property.

2. Non-Technical Description of the Invention[4]

74. The ’865 Patent generally relates to an LP-MHC designed to fit into the undercabinet hood space above a cooking range, providing a two-in-one kitchen appliance with microwave and ventilation capabilities. The ’865 Patent claims an LP-MHC designed in a way that provides significantly scaled down overall vertical dimensions (as compared to a traditional microwave), allowing for installation in areas that previously could only accommodate a standalone ventilation hood. The claimed invention provides both robust air intake and expulsion of byproducts produced when using the cooking range below (e.g., smoke, steam, and/or grease) and cooling of the cooking area inside the LP-MHC. The claimed invention therefore saves countertop space without sacrificing performance, providing users with an efficient and innovative dual-function kitchen appliance.

3. Foreign & Domestic Counterparts

75. Pursuant to Commission Rule 210.12 (a)(9)(v), the ’865 Patent issued from U.S. Patent Application No. 18/312,916, filed on May 5, 2023, which is a continuation of U.S. Patent Application No. 18/073,694, filed on December 2, 2022, now the ’317 Patent, which is a continuation of U.S. Patent Application No. No. 16/265,432, filed on February 1, 2019, now U.S. Patent No. 11,523,473, which is a continuation-in-part of U.S. Patent Application No. 16/090,440, filed as Application No. PCT/CN2017/080048 on April 11, 2017, now the ’118 Patent, and claims the benefit of Provisional U.S. Patent Application No. 62/321,283, filed on April 12, 2016.

[4] This Complaint, including this section, does not, and is not intended to, construe or limit the scope or meaning of the ’865 Patent or any of its claims.

76. Pursuant to Commission Rule 210.12 (a)(9)(v), only the following foreign patent application corresponds to the ’865 Patent:

Patent/Application	Publication Date
WO2017177890	Published October 19, 2017

4. Expiration Date

77. The ’865 Patent expires on April 11, 2037.

D. THE ’317 PATENT

1. Identification of Patent Ownership and Licensing

78. The ’317 Patent issued on October 29, 2024, to inventors Owen Zhang, Michael Ledford, Stephen Zheng, and Xiangxu Liu. As required by Commission Rule 210.12(a)(9)(i), a certified copy of the ’317 Patent is attached as Exhibit 4.

79. Whirlpool owns by assignment the entire right, title, and interest to and in the ’317 Patent. As required by Commission Rule 210.12(a)(9)(ii), a certified copy of the assignment records for the ’317 Patent is attached as Exhibit 8.

80. As required by Commission Rule 210.12(c)(1), a certified copy of the prosecution history for the ’317 Patent has been submitted with this Complaint as Appendix G. Copies of the cited references for the ’317 Patent have been submitted with this Complaint as Appendix H.

81. The ’317 Patent has 20 claims, 3 independent claim and 17 dependent claims.

82. As required by Commission Rule 210.12(a)(9)(iii), a list of licenses involving the ’317 Patent is attached as Confidential Exhibit 37C. Whirlpool additionally has various intercompany agreements between affiliated companies that provide for the use of Whirlpool Corporation intellectual property.

2. Non-Technical Description of the Invention[5]

83. The ’317 Patent generally relates to an LP-MHC designed to fit into the undercabinet hood space above a cooking range, providing a two-in-one kitchen appliance with microwave and ventilation capabilities. The ’317 Patent claims an LP-MHC designed in a way that provides significantly scaled down overall vertical dimensions (as compared to a traditional microwave), allowing for installation in areas that previously could only accommodate a standalone ventilation hood. The claimed invention provides both robust air intake and expulsion of byproducts produced when using the cooking range below (e.g., smoke, steam, and/or grease) and cooling of the cooking area inside the LP-MHC. The claimed invention therefore saves countertop space without sacrificing performance, providing users with an efficient and innovative dual-function kitchen appliance.

3. Foreign & Domestic Counterparts

84. Pursuant to Commission Rule 210.12 (a)(9)(v), the ’317 Patent issued from U.S. Patent Application No. 18/073,694, filed on December 2, 2022, which is a continuation of U.S. Patent Application No. 16/265,432, filed on February 1, 2019, now U.S. Patent No. 11,523,473, which is a continuation-in-part of U.S. Patent Application No. 16/090,440, filed as application No. PCT /CN2017 /080048 on April 11, 2017, now the ’118 Patent, and claims the benefit of Provisional U.S. Patent Application No. 62/321,283, filed on April 12, 2016.

85. Pursuant to Commission Rule 210.12 (a)(9)(v), the following foreign patents and patent applications correspond to ’317 Patent:

Patent/Application	Publication Date
WO2017177890	Published October 19, 2017

[5] This Complaint, including this section, does not, and is not intended to, construe or limit the scope or meaning of the ’317 Patent or any of its claims.

4. Expiration Date

86. The ’317 Patent expires on April 11, 2037.

E. THE ’819 PATENT

1. Identification of Patent Ownership and Licensing

87. The ’819 Patent issued on April 29, 2025, to inventors Owen Zhang, Michael Ledford, Stephen Zheng, and Xiangxu Liu. As required by Commission Rule 210.12(a)(9)(i), a certified copy of the ’819 Patent is attached as Exhibit 5.

88. Whirlpool owns by assignment the entire right, title, and interest to and in the ’819 Patent. Under Commission Rule 210.12(a)(9)(ii), Whirlpool states that the ’819 Patent is a continuation patent and does not have a separately recorded assignment record at the PTO.

89. As required by Commission Rule 210.12(c)(1), a certified copy of the prosecution history for the ’819 Patent has been submitted with this Complaint as Appendix I. Copies of the cited references for the ’819 Patent have been submitted with this Complaint as Appendix J.

90. The ’819 Patent has 30 claims, 2 independent claims and 28 dependent claims.

91. As required by Commission Rule 210.12(a)(9)(iii), a list of licenses involving the ’819 Patent is attached as Confidential Exhibit 37C. Whirlpool additionally has various intercompany agreements between affiliated companies that provide for the use of Whirlpool Corporation intellectual property.

2. Non-Technical Description of the Invention[6]

92. The ’819 Patent generally relates to an LP-MHC designed to fit into the undercabinet hood space above a cooking range, providing a two-in-one kitchen appliance with

[6] This Complaint, including this section, does not, and is not intended to, construe or limit the scope or meaning of the ’819 Patent or any of its claims.

microwave and ventilation capabilities. The ’819 Patent claims an LP-MHC designed in a way that provides significantly scaled down overall vertical dimensions (as compared to a traditional microwave), allowing for installation in areas that previously could only accommodate a standalone ventilation hood. The claimed invention provides both robust air intake and expulsion of byproducts produced when using the cooking range below (e.g., smoke, steam, and/or grease) and cooling of the cooking area inside the LP-MHC. The claimed invention therefore saves countertop space without sacrificing performance, providing users with an efficient and innovative dual-function kitchen appliance.

3. Foreign & Domestic Counterparts

93. Pursuant to Commission Rule 210.12 (a)(9)(v), the ’819 Patent issued from U.S. Patent Application No. 18/886,749, filed on September 16, 2024, which is a continuation of U.S. Patent Application No. 18/312,925, filed on May 5, 2023, which is a continuation of U.S. Patent Application No. 18/073,694, filed on December 2, 2022, now the ’317 Patent, which is a continuation of U.S. Patent Application No. 16/265,432, filed on February 1, 2019, now U.S. Patent No. 11,523,473, which is a continuation-in-part of U.S. Patent Application No. 16/090,440, filed as application No. PCT/CN2017/080048 on April 11, 2017, now the ’118 Patent, and claims the benefit of Provisional U.S. Patent Application No. 62/321,283, filed on April 12, 2016. The following additional patent applications correspond to the ’819 Patent: U.S. Patent Application No. 19/066,773, filed on February 28, 2025. The status of this application is currently pending.

94. Pursuant to Commission Rule 210.12 (a)(9)(v), only the following foreign patent application corresponds to the ’819 Patent:

Patent/Application	Publication Date
WO2017177890	Published October 19, 2017

4. Expiration Date

95. The ’819 Patent expires on April 11, 2037.

VI. UNLAWFUL AND UNFAIR ACTS OF PROPOSED RESPONDENTS

A. Specific Instances of Unfair Importation and Sale

96. Whirlpool purchased within the United States at least one Accused Product sold for importation, imported, and/or sold in the United States after importation by each of the Proposed Respondents. Each of the Accused Products that Whirlpool purchased in the United States contains markings showing that it was manufactured and/or assembled in Malaysia or China. Exhibit 18 to the Complaint contains photographs of the Accused Products that Whirlpool purchased in Washington, D.C. Exhibit 18 shows that the manufacturing and/or assembly location for each Accused Product is Malaysia or China. Thus, as shown in Exhibit 18, at least one Accused Product from each Proposed Respondent was manufactured in Malaysia or China and imported into the United States.

97. Receipts for Whirlpool’s purchase of the Accused Products within the United States are identified as follows:

Proposed Respondent Supplier	Proposed Respondent Manufacturer	Brand	Model Number	Purchase Receipt Exhibit(s)
Samsung	Samsung	Samsung	ME11A7710DS/AA	51, 83, 97
Samsung	Samsung	Samsung	ME11A7510DS	104
Samsung	Samsung	Samsung	ME11CB751012	105
Samsung	Samsung	Dacor	DMO30U970SS/DA	106
LG	LG	LG	MVEF1337F	98
LG	LG	LG	MVEF1323F	107
Midea	Midea	Midea	MMO12S3AST	52, 93, 99
Cosmo	Midea	Cosmo	COS-3012ORLP1SS	17, 92, 99
Meyer	Midea	Farberware	FMR12LPSS	99
THOR	Midea	THOR	TOR30L	17, 68, 99
Unique	Midea	Unique	UNQ-30CR OTR W	17, 38, 99
Haier	Midea	GE	UVM9125STSS	51, 100, 108

Koolmore	Midea	Koolmore	KM-MLPOT-1SS	101
Electrolux	Midea	Electrolux / Frigidaire	GMOS1266AF	51, 83, 102
FORNO	Midea	FORNO	FOTR3080-30	103

98. Whirlpool purchased and inspected each of the above units to confirm importation thereof and infringement of the Asserted Patents.

99. Thus, each of the Proposed Respondents have imported into the United States from Malaysia or China, sold for importation to the United States from Malaysia or China, and/or sold in the United States after importation from Malaysia or China, one or more Accused Products that infringe the Asserted Patents.

B. Direct Infringement of the Asserted Patents

100. On information and belief, the Accused Products include, but are not limited to, the models identified in the below table. Asterisks indicate the models that Whirlpool purchased and physically inspected for infringement and importation purposes. The table also identifies exemplary claim charts for each Accused Product. Certain Accused Products are representative of each other for purposes of infringement. Accordingly, the below chart also identifies, when applicable, exhibits showing which of the Accused Products are representative of each other.

Model	Proposed Respondent Manufacturer	Proposed Respondent Supplier	Asserted Patent(s)	Claim Chart & Representativeness Exhibit(s)
*DMO30U970SS/DA	Samsung	Samsung	118, 967, 865, 317, 819	40-42, 44, 46, 54
ME11A7510DG	Samsung	Samsung	317, 819	43, 45, 53
ME11A7510DG/AA	Samsung	Samsung	317, 819	43, 45, 53
*ME11A7510DS	Samsung	Samsung	317, 819	43, 45, 53
ME11A7510SS	Samsung	Samsung	317, 819	43, 45, 53
ME11A7710DG/AA	Samsung	Samsung	118, 967, 865, 317, 819	40-42, 44, 46, 54
ME11A7710DS	Samsung	Samsung	118, 967, 865, 317, 819	40-42, 44, 46, 54
*ME11A7710DS/AA	Samsung	Samsung	118, 967, 865, 317, 819	40-42, 44, 46, 54

ME11A7710DSS	Samsung	Samsung	118, 967, 865, 317, 819	40-42, 44, 46, 54
*ME11CB751012	Samsung	Samsung	317, 819	43, 45, 53
ME11CB751012/AA	Samsung	Samsung	317, 819	43, 45, 53
ME11CB751012WH	Samsung	Samsung	317, 819	43, 45, 53
*MVEF1323F	LG	LG	819	48
MVEF1323SS	LG	LG	819	48
*MVEF1337F	LG	LG	317, 819	47, 49
MVEF1337SS	LG	LG	317, 819	47, 49
*MMO12S3AST	Midea	Midea	819	50, 55
*UVM9125STSS	Midea	Haier	819	50, 55
*GMOS1266AF	Midea	Electrolux	819	96
GMOS1266SS	Midea	Electrolux	819	96
*COS-3012ORLP1SS	Midea	Cosmo	819	50, 55
*FMR12LPSS	Midea	Meyer	819	50, 55
*KM-MLPOT-1SS	Midea	Koolmore	819	50, 55
*TOR30L	Midea	THOR	819	50, 55
*UNQ-30CR OTR W	Midea	Unique	819	50, 55
*FOTR3080-30	Midea	FORNO	819	50, 55

101. The above product listing is exemplary in nature and does not include all possible accused products. On information and belief, discovery may reveal additional accused products. Additionally, the proposed remedy shall apply to all articles that infringe and shall not be limited to the above models.

102. Under Commission Rule 210.12(b), Whirlpool states that the sample Accused Products Whirlpool has obtained in the United States are bulky in nature and have been disassembled, thus making them difficult to submit to the Commission. Instead, photographs of the Accused Products are attached as Exhibits 56-67 and 94, and product manuals associated with the Accused Products are attached as Exhibits 69-82 and 95.

1. Proposed Respondent Samsung

103. On information and belief, Proposed Respondent Samsung imports, sells for importation, and/or sells within the United States after importation certain Samsung and Dacor-branded LP-MHCs manufactured in Malaysia and that infringe (directly, indirectly, and literally

and/or under the doctrine of equivalents) at least claims 1-5 and 18 of the ’118 Patent, claims 1-5 and 7-23 of the ’967 Patent, claims 1-21 of the ’865 Patent, claims 1-6 and 8 of the ’317 Patent, and claims 1-23, 25-26, 28-30 of the ’819 Patent.

104. The Samsung Accused Products contain either (i) a dual cage vent fan assembly (“Type A”) or (ii) a vent fan and dual cage vent fan assembly (“Type B”). Each of the Type A Samsung Accused Products are representative of each other for purposes of infringement. A chart demonstrating that the Type A Samsung Accused Products are representative of each other is included as Exhibit 53. Likewise, each of the Type B Samsung and Dacor Accused Products are representative of each other for purposes of infringement. A chart demonstrating that the Type B Samsung and Dacor Accused Products are representative of each other is included as Exhibit 54. Finally, Exhibits 40-46, submitted herewith, are claim charts showing how the Samsung/Dacor Accused Products infringe each asserted independent claim of the Asserted Patents.

2. Proposed Respondent LG

105. On information and belief, Proposed Respondent LG imports, sells for importation, and/or sells within the United States after importation certain LP-MHCs manufactured in China and that infringe (directly, indirectly, and literally and/or under the doctrine of equivalents) at least claims 1-6 and 8 of the ’317 Patent and claims 1-22 and 24-30 of the ’819 Patent.

106. The LG Accused Products contain either (i) a dual cage vent fan assembly (“Type A”) or (ii) a vent fan and dual cage vent fan assembly (“Type B”). Each of the Type A LG Accused Products are representative of each other for purposes of infringement. Likewise, each of the Type B LG Accused Products are representative of each other for purposes of

infringement. Exhibits 47-49, submitted herewith, are claim charts showing how the LG Accused Products infringe each asserted independent claim of the ’317 and ’819 Patents.

3. Proposed Respondents Midea, Haier, Cosmo, Meyer, Koolmore, THOR, Unique, and FORNO

107. On information and belief, Proposed Respondents Midea, Haier, Cosmo, Meyer, Koolmore, THOR, Unique, and FORNO import, sell for importation, and/or sell within the United States after importation certain LP-MHCs manufactured in China and that infringe (directly, indirectly, and literally and/or under the doctrine of equivalents) at least claims 1-18, 21-22, and 24-30 of the ’819 Patent. Exhibit 55, submitted herewith, shows that all Accused Products of Proposed Respondents Midea, Haier, Cosmo, Meyer, Koolmore, THOR, Unique, and FORNO are representative of each other for purposes of infringement. Exhibit 50, submitted herewith, is a claim chart showing how the Accused Products of Proposed Respondents Midea, Haier, Cosmo, Meyer, Koolmore, THOR, Unique, and FORNO infringe each asserted independent claim of the ’819 Patent.

4. Proposed Respondent Electrolux

108. On information and belief, Proposed Respondent Electrolux imports, sells for importation, and/or sells within the United States after importation certain LP-MHCs manufactured in China and that infringe (directly, indirectly, and literally and/or under the doctrine of equivalents) at least claims 1-12, 16-18, 21-22, and 24-30 of the ’819 Patent. Exhibit 96, submitted herewith, is a claim chart showing how the Electrolux Accused Products infringe each asserted independent claim of the ’819 Patent.

C. Indirect Infringement of the Asserted Patents

109. On information and belief, Proposed Respondents currently actively induce and have induced infringement of the asserted claims of the Asserted Patents pursuant to 35 U.S.C. §

271(b) through, among other things, actively encouraging others to make, use, import, offer for sale, and/or sell in the United States the Accused Products.

110. For example, Proposed Respondent Samsung actively promotes the sale, use, and importation of the Samsung/Dacor-branded Accused Products in marketing materials, product manuals, and web pages on its website, and through its sales and distribution channels that encourage infringing sales, offers to sell, and importation of the Accused Products. *See, e.g.,* Exhibit 84.

111. Proposed Respondent LG likewise actively promotes the sale, use, and importation of the LG-branded Accused Products in marketing materials, product manuals, and web pages on its website, and through its sales and distribution channels that encourage infringing sales, offers to sell, and importation of the Accused Products. *See, e.g.,* Exhibit 85.

112. Proposed Respondents Midea, Haier, Electrolux, Cosmo, Meyer, Koolmore, THOR, Unique, and FORNO also actively promote the sale, use, and importation of the Midea, GE, Frigidaire/Electrolux, Cosmo, Farberware, Koolmore, THOR, Unique, and FORNO-branded Accused Products in marketing materials, product manuals, and web pages on their websites, and through their sales and distribution channels that encourage infringing sales, offers to sell, and importation of the Accused Products. *See, e.g.,* Exhibits 86-91.

113. Additionally, Proposed Respondent Midea induces infringement of the ’819 Patent through its supply of LP-MHCs to Proposed Respondents Electrolux, Haier, Cosmo, Meyer, Koolmore, THOR, Unique, and FORNO and through its encouragement that those Proposed Respondents distribute and sell the accused LP-MHCs in the United States. In turn, Proposed Respondents Haier, Electrolux, Cosmo, Meyer, Koolmore, THOR, Unique, and FORNO induce Proposed Respondent Midea to infringe the ’819 Patent through their

encouragement of Midea to manufacture and supply infringing LP-MHCs to these Proposed Respondents.

114. Contemporaneous with the filing of this Complaint, Whirlpool provided each of the Proposed Respondents with a copy of the Complaint and the applicable infringement claim chart(s) to the Complaint. As a result, the Proposed Respondents received notice of the respective Asserted Patents for which they are accused of infringement no later than the filing and service of the Complaint. Thus, on information and belief, Proposed Respondents have had knowledge of the Asserted Patents and knowledge that the Accused Products infringe the asserted claims of the Asserted Patents since at least the filing and service of this Complaint.

115. Moreover, on information and belief, at least Proposed Respondent Samsung had pre-suit knowledge of the Asserted Patents. On October 1, 2017, SEC filed Canadian patent application number CA177545S, which cites the Asserted Patent family as prior art.

VII. HARMONIZED TARIFF SCHEDULE ITEM NUMBERS

116. On information and belief, the imported LP-MHCs may be classified under at least 8516.50.0090 of the United States Harmonized Tariff Schedule ("HTS"). This HTS number is for illustration only and is not intended to restrict the products accused.

VIII. RELATED LITIGATION

117. Concurrent with the filing of this Complaint, Whirlpool has filed a complaint for patent infringement of the Asserted Patents by Proposed Respondents Samsung and LG in the U.S. District Court for the Eastern District of Texas.

118. Concurrent with the filing of this Complaint, Whirlpool has also filed complaints for patent infringement of one or more of the Asserted Patents by Proposed Respondents Midea, Haier, and Electrolux in the U.S. District Court for the District of New Jersey.

119. Concurrent with the filing of this Complaint, Whirlpool has also filed complaints for patent infringement of the ’819 Patent by GE and ECP in the U.S. District Court for the District of Delaware.

120. There has been no other foreign or domestic court or agency litigation involving the Asserted Patents or the subject matter thereof.

IX. THE DOMESTIC INDUSTRY

121. An industry as required by Section 337(a)(2) and defined by Section 337(a)(3) exists and/or is in the process of being established in the United States relating to the Asserted Patents, through Whirlpool’s significant investments in plant and equipment, significant employment of labor and capital, and substantial investments in exploitation through engineering and research and development in Whirlpool articles that practice the Asserted Patents.

122. Founded in 1911, Whirlpool is an iconic American company with its worldwide headquarters in Benton Harbor, Michigan. Whirlpool’s appliance brands include, among others, Whirlpool, KitchenAid, JennAir, Maytag, and Amana and can be found in households and businesses throughout the United States and the world. As of 2024, Whirlpool had approximately $17 billion in annual net sales and 44,000 employees, 39% of which were located in the United States. The Commission has previously found that Whirlpool satisfied the technical and economic prongs of the domestic industry requirement. *See Certain Refrigerators and Components Thereof*, Inv. No. 337-TA-632, Comm’n Op. at 64-66 (Mar. 11, 2010).

123. Development of the LP-MHCs at issue in this Complaint began in 2015 and has involved U.S.-based engineers and other U.S.-based employees on a near-continuous basis through today. Whirlpool continues to improve upon LP-MHCs and launch new products with enhanced features.

A. Technical Prong

124. Whirlpool's LP-MHCs practice, literally and/or under the doctrine of equivalents, at least claims 1-5 and 18 of the '118 Patent, claims 1-24 of the '967 Patent, claims 1-22 of the '865 Patent, claims 1-8 of the '317 Patent, and claims 1-23 and 25-30 of the '819 Patent.

125. Whirlpool distributes under the Whirlpool and KitchenAid brand names three model types of LP-MHCs: (i) low-profile ("LPs"), (ii) Smart LPs, and (iii) Low-Cost LPs ("LCLPs"). The below table identifies the Whirlpool LP-MHC models that practice the Asserted Patents, organized by brand and model type.

MODEL NO.	BRAND	MODEL TYPE	ASSERTED PATENT
KMLS311HBS	KitchenAid	LP	'118, '967, '865, '317, '819
KMLS311HWH	KitchenAid	LP	'118, '967, '865, '317, '819
WML55011HS	Whirlpool	LP	'118, '967, '865, '317, '819
WML75011HB	Whirlpool	LP	'118, '967, '865, '317, '819
WML75011HV	Whirlpool	LP	'118, '967, '865, '317, '819
WML75011HW	Whirlpool	LP	'118, '967, '865, '317, '819
WML75011HZ	Whirlpool	LP	'118, '967, '865, '317, '819
KMLS311HSS	KitchenAid	LP	'118, '967, '865, '317, '819
WML55011HWH	Whirlpool	LP	'118, '967, '865, '317, '819
WML55011HBK	Whirlpool	LP	'118, '967, '865, '317, '819
WML55011HSS	Whirlpool	LP	'118, '967, '865, '317, '819
WML75011HZSS	Whirlpool	LP	'118, '967, '865, '317, '819
WML75011HN	Whirlpool	LP	'118, '967, '865, '317, '819
KMLS311HBL	KitchenAid	LP	'118, '967, '865, '317, '819
YWML75011HN	Whirlpool	LP	'118, '967, '865, '317, '819
YKMLS311HBL	KitchenAid	LP	'118, '967, '865, '317, '819
YWML55011HW	Whirlpool	LP	'118, '967, '865, '317, '819
YWML55011HB	Whirlpool	LP	'118, '967, '865, '317, '819
YWML55011HS	Whirlpool	LP	'118, '967, '865, '317, '819
YWML75011HW	Whirlpool	LP	'118, '967, '865, '317, '819
YWML75011HB	Whirlpool	LP	'118, '967, '865, '317, '819
YWML75011HZ	Whirlpool	LP	'118, '967, '865, '317, '819
YWML75011HV	Whirlpool	LP	'118, '967, '865, '317, '819
YKMLS311HWH	KitchenAid	LP	'118, '967, '865, '317, '819
YKMLS311HSS	KitchenAid	LP	'118, '967, '865, '317, '819

MODEL NO.	BRAND	MODEL TYPE	ASSERTED PATENT
YKMLS311HBS	KitchenAid	LP	’118, ’967, ’865, ’317, ’819
KMML550RPS	KitchenAid	Smart LP	’118, ’967, ’865, ’317, ’819
WMML5530RV	Whirlpool	Smart LP	’118, ’967, ’865, ’317, ’819
WMML5530RW	Whirlpool	Smart LP	’118, ’967, ’865, ’317, ’819
WMML5530RZ	Whirlpool	Smart LP	’118, ’967, ’865, ’317, ’819
WMML5530RWH	Whirlpool	Smart LP	’118, ’967, ’865, ’317, ’819
WMML5530RBK	Whirlpool	Smart LP	’118, ’967, ’865, ’317, ’819
WMML5530RBKSS	Whirlpool	Smart LP	’118, ’967, ’865, ’317, ’819
KMML550RPSS	KitchenAid	Smart LP	’118, ’967, ’865, ’317, ’819
WMML5530RZSS	Whirlpool	Smart LP	’118, ’967, ’865, ’317, ’819
KMML550RBS	KitchenAid	Smart LP	’118, ’967, ’865, ’317, ’819
YWMML5530RB	Whirlpool	Smart LP	’118, ’967, ’865, ’317, ’819
YWMML5530RW	Whirlpool	Smart LP	’118, ’967, ’865, ’317, ’819
YWMML5530RZ	Whirlpool	Smart LP	’118, ’967, ’865, ’317, ’819
YWMML5530RV	Whirlpool	Smart LP	’118, ’967, ’865, ’317, ’819
YKMML550RPS	KitchenAid	Smart LP	’118, ’967, ’865, ’317, ’819
YKMML550RBS	KitchenAid	Smart LP	’118, ’967, ’865, ’317, ’819
WML35011KB	Whirlpool	LCLP	’317, ’819
WML35011KS	Whirlpool	LCLP	’317, ’819
WML35011KW	Whirlpool	LCLP	’317, ’819
YWML35011KW	Whirlpool	LCLP	’317, ’819
YWML35011KS	Whirlpool	LCLP	’317, ’819
YWML35011KB	Whirlpool	LCLP	’317, ’819

126. Each of the LP models are representative of each other for purposes of satisfying the technical prong of the domestic industry requirement. Likewise, each of the Smart LP models are representative of each other for purposes of satisfying the technical prong of the domestic industry requirement. Finally, each of the LCLP models are representative of each other for purposes of satisfying the technical prong of the domestic industry requirement.

127. Representative claim charts demonstrating that Whirlpool Smart LPs and LPs practice, literally and/or under the doctrine of equivalents, claim 1 of the ’118 Patent are attached as Exhibits 19 and 20, respectively. Representative claim charts demonstrating that Whirlpool Smart LPs and LPs practice, literally and/or under the doctrine of equivalents, claim 1 of the ’967 Patent are attached as Exhibits 21 and 22, respectively. Representative claim charts

demonstrating that Whirlpool Smart LPs and LPs practice, literally and/or under the doctrine of equivalents, claim 1 of the ’865 Patent are attached as Exhibits 23 and 24, respectively. Representative claim charts demonstrating that Whirlpool Smart LPs, LPs, and LCLPs practice, literally and/or under the doctrine of equivalents, claim 1 of the ’317 Patent are attached as Exhibits 25, 26, and 27, respectively. Representative claim charts demonstrating that Whirlpool Smart LPs, LPs, and LCLPs practice, literally and/or under the doctrine of equivalents, claims 1 and 30 of the ’819 Patent are attached as Exhibits 28, 29, and 30, respectively.

128. Photographs of representative Whirlpool LP-MHCs that practice the Asserted Patents are attached as Exhibits 31-33. The product manuals for the practicing LP-MHCs are attached as Exhibits 34-36.

B. Economic Prong

129. As set forth below and in the accompanying Confidential Declaration of Ashley Kovalcik (Exhibit 6C), Whirlpool has made extensive investments in the United States in the LP-MHCs that practice the Asserted Patents (“the DI Products”).

130. As noted above, the LCLP models are alleged to practice only the ’317 and ’819 Patents; thus, Whirlpool has provided a separate accounting in Exhibit 6C for the LCLP models in the event that only the ’118, ’967, and ’865 Patents are found to be valid and practiced by the DI Products such that the LCLP investments need to be removed.

1. Significant Investments in Plant & Equipment

131. A domestic industry exists and/or is in the process of being established in the United States by virtue of the significant investments in plant and equipment made by Whirlpool

in the DI Products. These investments are related to, among other things, researching, developing, and supporting the DI Products in the United States.

132. As referenced above, Whirlpool's worldwide headquarters are located in Benton Harbor, Michigan, where Whirlpool's senior management responsible for the DI Products work. The Benton Harbor headquarters are also home to numerous engineers, supply chain managers, customer service professionals, and sales and marketing employees who support the DI Products. Whirlpool additionally maintains a facility in Chicago, Illinois, where significant marketing activities take place. Whirlpool additionally maintains (i) warehousing, distribution, and training facilities for the DI Products throughout the United States, (ii) a call center in the United States, where calls concerning the DI Products from consumers and installation professionals are placed, and (iii) an installation network throughout the United States to install the DI Products in customer's homes and business. Whirlpool also maintains physical space in retailers throughout the United States for the sale of DI Products.

133. Whirlpool's significant investments in plant and equipment for the DI Products are provided in more detail in Exhibit 6C.

2. Significant Investments in Labor and Capital

134. A domestic industry exists and/or is in the process of being established in the United States by virtue of the significant investments in labor and capital made by Whirlpool in the DI Products. These investments are directed to, among other things, Whirlpool employees engaged in the research, development, and support of the DI Products in the United States.

135. Whirlpool maintains numerous employees, contractors, and subcontractors throughout the United States, who provide engineering, supply chain (including warehousing, distribution, delivery, and installation), post-sale service, and sales and marketing support for the DI Products.

136. Whirlpool's significant investments in labor and capital for the DI Products are provided in more detail in Exhibit 6C.

3. Substantial Investments in Engineering and Research & Development

137. A domestic industry exists and/or is in the process of being established in the United States by virtue of Whirlpool's substantial investment in exploitation through engineering and research and development for the DI Products that practice the Asserted Patents.

138. Since 2015, Whirlpool has invested in the United States in the research and development of the DI Products. Whirlpool launched the first DI Product in 2018 and continues to launch new models, including models currently under development. Whirlpool's substantial investments in engineering and research and development are provided in more detail in Exhibit 6C.

139. A nexus exists between Whirlpool's investments and the Asserted Patents at least because the DI Products are the physical embodiment of the Asserted Patents. Thus, a nexus is presumed to exist under Commission precedent.

140. Finally, Whirlpool's investments in the DI Products are contextually significant, both quantitatively and qualitatively. For example, without Whirlpool's domestic investments in engineering, research, and development, the DI Products could not have been commercialized. Moreover, without Whirlpool's domestic investments in a vast supply chain, the DI Products could not be distributed in the United States. Similarly, without Whirlpool's domestic investments in sales, marketing, installation, and customer support, the DI Products could not be sold and supported in the United States.

X. RELIEF REQUESTED

141. WHEREFORE, by reason of the foregoing, Whirlpool respectfully requests that the U.S. International Trade Commission:

(a) Institute an immediate investigation, pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337(a)(l)(B)(i) and (b)(l), with respect to violations of Section 337 based on the importation, sale for importation, and sale after importation, into the United States of Proposed Respondents' Accused Products that infringe one or more claims of the Asserted Patents;

(b) Schedule and conduct a hearing on said unlawful acts and, following said hearing;

(c) Render a determination that the importation, sale for importation, and/or sale after importation of Proposed Respondents' Accused Products constitutes one or more violations of Section 337 of the Tariff Act of 1930, as amended 19 U.S.C. § 1337;

(d) Issue a permanent limited exclusion order, pursuant to 19 U.S.C. § 1337(d)(l), barring from entry into the United States the Accused Products made by or on behalf of Proposed Respondents, that infringe one or more asserted claims of the Asserted Patents;

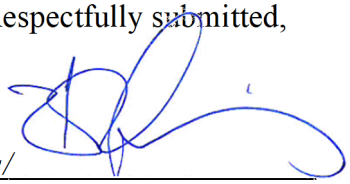
(e) Issue a permanent cease and desist order, pursuant to 19 U.S.C. § 1337(f), prohibiting Proposed Respondents and others acting on their behalf from domestically assembling, manufacturing, importing, selling, marketing, advertising, distributing, offering for sale, transporting (except for exportation), servicing, and soliciting U.S. agents or distributors for, Accused Products that infringe one or more asserted claims of the Asserted Patents; and

(f) Impose a bond upon Proposed Respondents' importation of infringing articles during the 60-day Presidential review period pursuant to 19 U.S.C. § 1337(j); and

(g) Grant such other and further relief as the Commission deems just and proper based on the facts determined by the investigation and the authority of the Commission.

Date: November 18, 2025

Respectfully submitted,



/s/

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VERIFICATION OF NATHAN DAVIS

I, Nathan Davis, declare, in accordance with 19 C.F.R. §§ 210.4 and 210.12(a), under penalty of perjury, that the following statements are true:

1. I am currently Legal Director, Patents & Intellectual Property Litigation at Whirlpool Corporation. I am duly authorized by Whirlpool to verify the foregoing Complaint.

2. To the best of my knowledge, information, and belief, formed after a reasonable inquiry, the Complaint is not being presented for any improper purpose, such as to harass or cause unnecessary delay or needless increase in the cost of the investigation.

3. To the best of my knowledge, information, and belief, formed after a reasonable inquiry, the claims, defenses, and other legal contentions in the Complaint are warranted by existing law or by a nonfrivolous argument for the extension, modification, or reversal of existing law or the establishment of new law.

4. The allegations and other factual contentions in the Complaint have evidentiary support or, if specifically so identified, are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery.

Executed this 17th day of November, 2025 in Benton Harbor, MI.

Nathan Davis
Legal Director
Patents & Intellectual Property Litigation
Whirlpool Corporation.