

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
CALIFORNIA

Shandong Yunxiang Century Intelligent Technology Co., Ltd. et al. v.
Yannan Huang

Shandong Yunxiang v. Huang · No. 25-cv-01298-JST · Decided November 13, 2025

SUMMARY

The United States District Court for the Northern District of California grants Defendant Yannan Huang’s motion to dismiss claims arising from an alleged patent-infringement complaint submitted to Amazon. The Court concludes that it lacks both general and specific personal jurisdiction over Huang and grants Plaintiffs leave to amend solely to add jurisdictional allegations within 21 days.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Jon S. Tigar
JURISDICTION	United States District Court for the Northern District of California
DECIDED	November 13, 2025
DOCKET	25-cv-01298-JST
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant moved under Federal Rules of Civil Procedure 12(b)(2), 12(b)(3), and 12(b)(6) to dismiss Plaintiffs' first amended complaint. The court granted the motion on personal-jurisdiction grounds and granted limited leave to amend.
STANDARD OF REVIEW	On a Rule 12(b)(2) motion without an evidentiary hearing, the plaintiff must make a prima facie showing of personal jurisdiction; uncontroverted complaint allegations are accepted as true and conflicts in affidavits are resolved in the plaintiff's favor. The court applies California's long-arm statute and federal due-process principles. General jurisdiction requires an exacting minimum-contacts showing, while specific jurisdiction requires purposeful direction, a claim arising out of or relating to forum activities, and reasonableness and fairness.
PRECEDENTIAL VALUE	unknown

PARTIES

Shandong Yunxiang Century Intelligent Technology Co., Ltd.,
Shandong Jiuhui Information Technology Co., Ltd. v. Yannan Huang

TOPICS

personal jurisdiction motions to dismiss venue civil procedure patent law

PRACTICE AREAS

civil procedure intellectual property patent law commercial litigation

QUESTIONS PRESENTED

1. Whether the court had general personal jurisdiction over Huang.
2. Whether the court had specific personal jurisdiction over Huang based on his submission of intellectual-property complaints through Amazon and the alleged resulting harm.
3. Whether dismissal should be granted for lack of personal jurisdiction and, if so, whether Plaintiffs should receive leave to amend solely to add jurisdictional allegations.

HOLDINGS

1. The court lacked general personal jurisdiction over Huang because he was a resident of China and Plaintiffs did not allege facts establishing the exacting contacts required for general jurisdiction in California.
2. The court lacked specific personal jurisdiction over Huang because Plaintiffs failed to allege that Huang purposefully directed his activities at California residents or otherwise had sufficient California contacts.
3. Plaintiffs were granted leave to amend solely to add new jurisdictional allegations, with the amended complaint due within 21 days.

KEY QUOTATIONS

“Shandong’s allegations are insufficient to establish personal jurisdiction.” (at 5)

“Huang’s use of “Amazon’s intellectual property enforcement mechanism” does not suggest that Huang “purposefully directed” his activities at California.” (at 5)

“Leave to amend is granted solely to add new jurisdictional allegations.” (at 6)

FACTUAL BACKGROUND

Plaintiffs are Chinese corporations with principal places of business in China, and Defendant Huang is a resident of China and the listed applicant and inventor of a design patent for a gel seat cushion. Plaintiffs operated Amazon storefronts selling physically identical seat cushions in the United States. Huang submitted patent-infringement complaints to Amazon, which caused Amazon to remove at least one of Plaintiffs' listings. Plaintiffs alleged that Huang had not obtained or examined the accused products before submitting the

complaints and asserted claims for patent noninfringement, patent invalidity, patent unenforceability, unfair competition, and tortious interference.

PROCEDURAL HISTORY

Plaintiffs filed the action on February 7, 2025, and later filed a first amended complaint asserting declaratory-judgment claims concerning a design patent, unfair competition, and tortious interference. Defendant moved to dismiss for lack of personal jurisdiction, improper venue, and failure to state a claim. The court granted dismissal for lack of personal jurisdiction, without reaching the venue or Rule 12(b)(6) grounds, and allowed amendment solely to add new jurisdictional allegations within 21 days.

DISPOSITION

dismissed

CASES CITED

- *Boschetto v. Hansing*, 539 F.3d 1011, 1015 (9th Cir. 2008)
- *Schwarzenegger v. Fred Martin Motor Co.*, 374 F.3d 797, 800-01 (9th Cir. 2004)
- *Royal Hawaiian Orchards, L.P. v. Olson*, 2015 WL 3948821, at *1 (C.D. Cal. June 26, 2015)
- *Underberg v. Emp'rs Mut. Cas. Co.*, 2016 WL 1466506, at *3 (D. Mont. Apr. 14, 2016)
- *Piedmont Label Co. v. Sun Garden Packing Co.*, 598 F.2d 491, 496 (9th Cir. 1979)
- *Doe 1 v. AOL LLC*, 552 F.3d 1077, 1081 (9th Cir. 2009)
- *Allstar Mktg. Grp., LLC v. Your Store Online, LLC*, 666 F. Supp. 2d 1109, 1126 (C.D. Cal. 2009)
- *Del Toro v. Atlas Logistics*, 2013 WL 796593, at *2 (E.D. Cal. Mar. 4, 2013)
- *King v. Russell*, 963 F.2d 1301, 1304 (9th Cir. 1992)
- *Mendiondo v. Centinela Hosp. Med. Ctr.*, 521 F.3d 1097, 1104 (9th Cir. 2008)
- *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 555 (2007)
- *Knieval v. ESPN*, 393 F.3d 1068, 1072 (9th Cir. 2005)
- *In re Gilead Scis. Sec. Litig.*, 536 F.3d 1049, 1055 (9th Cir. 2008)
- *Action Embroidery Corp. v. Atl. Embroidery, Inc.*, 368 F.3d 1174, 1180 (9th Cir. 2004)
- *Bristol-Myers Squibb Co. v. Superior Court*, 582 U.S. 255, 261-62 (2017)
- *Ranza v. Nike, Inc.*, 793 F.3d 1059, 1069 (9th Cir. 2015)
- *Goodyear Dunlop Tires Operations, S.A. v. Brown*, 564 U.S. 915, 924 (2011)
- *Chung v. Chih-Mei*, 714 F. Supp. 3d 1152, 1157 (N.D. Cal. 2024)
- *Chung v. Yung-Hui*, No. 24-1318, 2025 WL 1950089 (9th Cir. July 16, 2025)
- *Xilinx, Inc. v. Papst Licensing GmbH & Co. KG*, 848 F.3d 1346, 1353 (Fed. Cir. 2017)
- *Elecs. for Imaging, Inc. v. Coyle*, 340 F.3d 1344, 1350 (Fed. Cir. 2003)
- *Lik v. Doe*, No. 20-CV-00255-DMR, 2020 WL 1984291, at *2 (N.D. Cal. Apr. 27, 2020)
- *Liqiang Wei v. Jiazhong Sun*, No. 18-CV-02136-MEJ, 2018 WL 1833897, at *5 (N.D. Cal. Apr. 18, 2018)

