UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ELI LILLY AND COMPANY,

Plaintiff,

v.

ALDERWOOD SURGICAL CENTER LLC D/B/A ALLURE ESTHETIC, D/B/A GALLERY OF COSMETIC SURGERY, D/B/A SEATTLE PLASTIC SURGERY, ET AL.

Defendant.

Case No. 2:24-cv-00878

COMPLAINT FOR:

1. **TRADEMARK INFRINGEMENT**
2. **FALSE ADVERTISING**
3. **FALSE DESIGNATION OF ORIGIN**
4. **UNFAIR AND DECEPTIVE TRADE PRACTICES**

JURY TRIAL DEMANDED

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INTRODUCTION

1. This is an action to protect patients from unstudied, unapproved, and unsafe drugs masquerading as Plaintiff Eli Lilly and Company's ("Lilly") FDA-approved medicines for adults with type 2 diabetes, obesity, or excess weight and weight-related medical problems. Defendants Alderwood Surgical Center LLC d/b/a Allure Esthetic, d/b/a Gallery of Cosmetic Surgery, and d/b/a Seattle Plastic Surgery ("Defendant Alderwood"); and Northwest Nasal Sinus Center P.S., d/b/a Northwest Face & Body ("Defendant Northwest"); Javad A. Sajan, M.D.; and Craig R. Jonov, M.D. (collectively, "Defendants") have designed their websites, social media, and advertising materials to deceive patients into thinking Defendants offer a way to obtain Lilly's clinically studied medicines, when in reality Defendants offer no such thing.[1] Lilly brings this action under federal and state law to protect patients from Defendants' dangerous, deceptive, and unlawful practices.

2. For nearly 150 years, Lilly has worked tirelessly to develop and deliver trusted and innovative medicines that meet critical and unmet patient needs. Lilly's proprietary MOUNJARO® and ZEPBOUND® are two such first-of-their-kind medicines, which are indicated for the serious conditions afflicting many tens of millions of Americans. To advance treatment of these chronic conditions, Lilly used its extensive experience with world-class medicines to develop the brand-new class of GLP-1 (glucagon-like peptide-1) and GIP (glucose-dependent insulinotropic polypeptide) dual-receptor agonists, which includes tirzepatide, the active ingredient in Lilly's MOUNJARO® and ZEPBOUND®. Lilly's MOUNJARO® and ZEPBOUND® are the only FDA-approved GLP-1/GIP medicines.

3. Before obtaining FDA approval, Lilly's new medicines underwent years-long clinical trials, which tested them for safety, quality, and effectiveness on thousands of patients. When approving these medicines, the FDA called Lilly's "novel" MOUNJARO® an "important advance" and observed that Lilly's ZEPBOUND® "addresses an unmet medical need." https://web.archive.org/web/20221028212253/https://www.fda.gov/news-events/press-

[1] In support of this Complaint, Lilly's allegations are upon actual knowledge with respect to itself and its own acts, and upon information and belief as to all other matters.

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announcements/fda-approves-novel-dual-targeted-treatment-type-2-diabetes (archived FDA MOUNJARO® approval press announcement); https://www.fda.gov/news-events/press-announcements/fda-approves-new-medication-chronic-weight-management (FDA ZEPBOUND® approval press announcement).

4. Compounded products sold as "tirzepatide," meanwhile, are not approved or even reviewed by the FDA. Pharmacies currently offering compounded versions of tirzepatide are not required to follow the FDA's "good manufacturing practices," nor to comply with the same controls on sterility and safe storage as manufacturers of FDA-approved medicines. They are also not required to report adverse events—an important regulatory requirement imposed on manufacturers of FDA-approved medicines for patient safety. Compounded drugs are not tested for safety, quality, or efficacy in clinical trials. Accordingly, and as the FDA has warned, "compounded drugs pose a higher risk to patients than FDA-approved drugs," such as MOUNJARO® and ZEPBOUND®. https://www.fda.gov/drugs/human-drug-compounding/drug-compounding-and-drug-shortages (FDA explainer on Drug Compounding).

5. Defendants falsely and unlawfully trade on Lilly's work, reputation, and goodwill, offering unproven and unapproved compounded drugs as if they were genuine Lilly medicines or generic versions thereof. But Defendants do not offer Lilly's proprietary MOUNJARO® and ZEPBOUND® medicines, nor any FDA-approved "generic" version of them. Indeed, Defendants' drugs have undergone ***none*** of the rigorous studies or approval processes that Lilly's medicines have. Passing Defendants' compounded drugs off as Lilly's MOUNJARO® and ZEPBOUND® is not merely deceptive—it's dangerous.

6. Defendants' intentional deception of patients is pervasive. For example, on several of their websites, Defendants include a supposed "Seattle Zepbound Weight Loss Program," sometimes called simply "ZEPBOUND, SEATTLE," as shown below:

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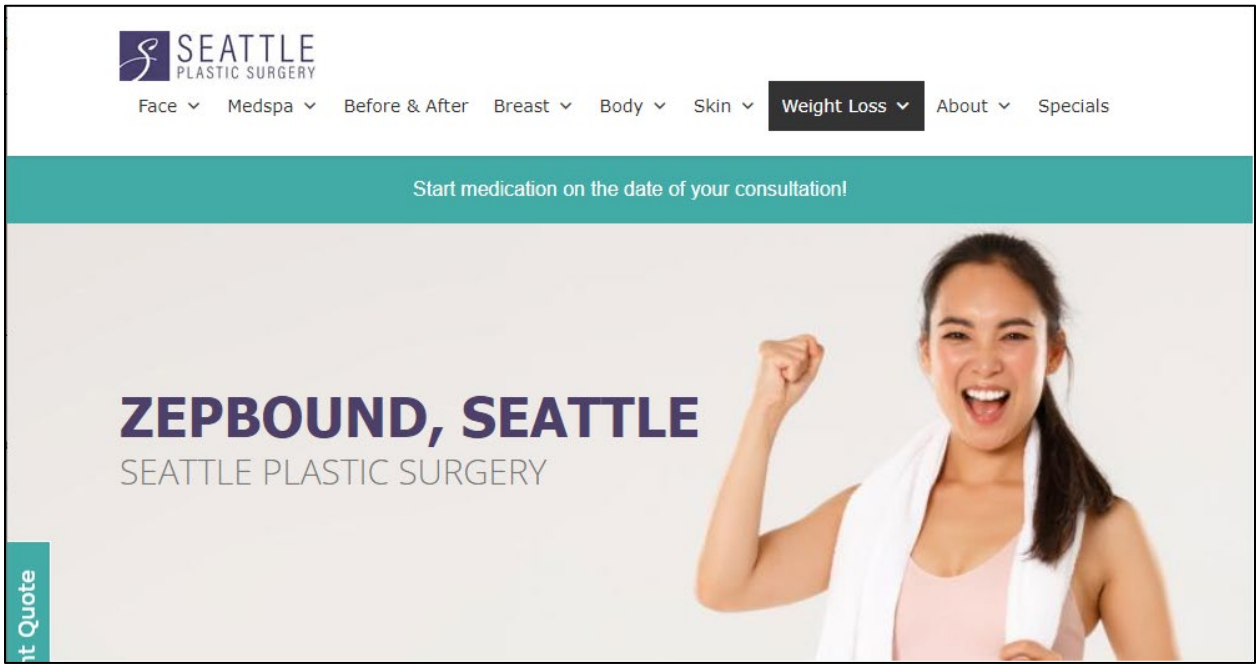

7. Despite this impossible-to-miss headline, Defendants do not offer ZEPBOUND®, nor any generic version of it. Rather, Defendants' "Zepbound Consultations" lead to patients being injected with "Compounded Tirzepatide," as shown below:

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8. In fact, there is ***no such thing*** as generic or compounded ZEPBOUND®. And ZEPBOUND® is not the same thing as the active pharmaceutical ingredient tirzepatide or compounded versions thereof.

9. Lilly therefore brings this action pursuant to the Lanham Act, 15 U.S.C. §§ 1051 *et seq.*, and for violation of Washington's consumer protection laws regarding unfair and deceptive trade practices. Lilly's claims arise out of Defendant's infringement of Lilly's rights in the MOUNJARO® and ZEPBOUND® trademarks and Defendant's acts of false designation of origin, false advertising, and unfair and deceptive trade practices.

THE PARTIES

10. Plaintiff Lilly is a corporation organized and existing under the laws of Indiana and has its principal place of business in Indiana.

11. Defendant Alderwood is a Washington limited liability company with a principal place of business at 3500 188th Street SW, Suite 670, Lynnwood, Washington 98037, in this District. Its registered agent is MPBA Service Company LLC, with registered agent address 701 5th Avenue, Suite 5500, Seattle, Washington 98104. Defendant Alderwood's governor is Defendant Javad A. Sajan, M.D. Defendant Alderwood conducts business under several trade names, each with its own website:

a. Allure Esthetic (https://www.allureesthetic.com/).

b. Gallery of Cosmetic Surgery (https://www.cosmeticsurgeryforyou.com/)

c. Seattle Plastic Surgery (https://www.seattleplasticsurgery.com/).

12. Defendant Northwest Nasal Sinus Center P.S., d/b/a Northwest Face & Body is a Washington professional service corporation with a principal place of business located at 3100 Carillon Point, Kirkland, Washington 98033, in this District. Its registered agent is MPBA Service Company LLC, with registered agent address 701 5th Avenue, Suite 5500, Seattle, Washington 98104. Defendant Northwest's governor is Defendant Javad A. Sajan, M.D. Defendant Northwest also conducts business on its website (https://www.nwface.com/).

13. Defendant Javad A. Sajan, M.D. is an individual residing in King County, Washington, in this District. Defendant Sajan is the owner of both Defendant Alderwood

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Surgical Center, LLC, which he acquired in 2016, and Defendant Northwest Nasal Sinus Center P.S., which he acquired in 2020.

14. Defendant Craig R. Jonov, M.D. is an individual residing in Snohomish County, Washington, in this District. Defendant Jonov holds himself out as an owner of Seattle Plastic Surgery. https://www.americanboardcosmeticsurgery.org/doctors/craig-r-jonov/.

JURISDICTION AND VENUE

15. The Court has subject matter jurisdiction over the Lanham Act causes of action pleaded herein pursuant to 15 U.S.C. § 1121 and 28 U.S.C. §§ 1331 and 1338(a). The Court has supplemental jurisdiction over the state and common law causes of action pleaded herein pursuant to 28 U.S.C. §§ 1338(b) and 1367(a).

16. Venue is proper in this District pursuant to 28 U.S.C. § 1391 because Defendants operate and conduct business in this District. Defendants are subject to personal jurisdiction in this District.

LILLY'S FDA-APPROVED TIRZEPATIDE MEDICINES: MOUNJARO® AND ZEPBOUND®

17. Lilly's MOUNJARO® is a novel treatment for type 2 diabetes, a chronic and progressive condition facing more than 30 million Americans. As the FDA has noted, "Despite the availability of many medications to treat diabetes, many patients do not achieve the recommended blood sugar goals." https://web.archive.org/web/20221028212253/https://www.fda.gov/news-events/press-announcements/fda-approves-novel-dual-targeted-treatment-type-2-diabetes (archived FDA MOUNJARO® approval press announcement). MOUNJARO® targets this problem head-on using an innovative active pharmaceutical ingredient, tirzepatide. Before it received FDA approval, Lilly's MOUNJARO® was clinically proven to improve blood sugar control "more effective[ly] than the other diabetes therapies with which it was compared in clinical studies." *Id.*

18. The FDA approved MOUNJARO® and indicated it in addition to diet and exercise to improve glycemic control in adults with type 2 diabetes mellitus. As part of the approval

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process, Lilly submitted data on safety, quality, and effectiveness collected through clinical trials involving thousands of patients. Lilly's MOUNJARO® is thus proven safe and effective when used as directed.

19. In addition to MOUNJARO®, Lilly markets and sells ZEPBOUND®, another proprietary, FDA-approved treatment option containing the active pharmaceutical ingredient tirzepatide. With ZEPBOUND®, Lilly aims to help the many dozens of millions of American adults with obesity or with excess weight and weight-related medical problems lower their risks of cardiovascular disease and other leading causes of death. As the FDA has noted, ZEPBOUND® "addresses an unmet medical need" by targeting "chronic weight management (weight reduction and maintenance)" through a new method of hormone-receptor activation. https://www.fda.gov/news-events/press-announcements/fda-approves-new-medication-chronic-weight-management (FDA ZEPBOUND® approval press announcement).

20. As with MOUNJARO®, the safety, quality, and effectiveness of ZEPBOUND® was established through rigorous clinical trials featuring thousands of patients. The FDA recently approved ZEPBOUND® and indicated it for adults with obesity (with a BMI of 30 kg/m2 or greater) or those who are overweight (with a BMI ≥ 27 kg/m2 or greater) and also have at least one weight-related additional condition, such as hypertension (high blood pressure), dyslipidemia (high cholesterol or fats in blood), type 2 diabetes mellitus, obstructive sleep apnea, or cardiovascular disease, to lose weight. It should be used with a reduced-calorie diet and increased physical activity.

21. Lilly's tirzepatide medicines are the result of billions of dollars of investments in research and development, which included dozens of studies and trials.

22. Countless highly specialized personnel ensure Lilly medicines meet quality and safety standards. Lilly manufactures its medicines under strict controls in state-of-the-art facilities. Transforming tirzepatide API to medicine is a complex, methodical, and science-based process. Lilly follows Good Manufacturing Practices (GMP), which are regulations that "provide[] for systems that assure proper design, monitoring, and control of manufacturing processes and facilities." https://www.fda.gov/drugs/pharmaceutical-quality-resources/facts-

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about-current-good-manufacturing-practice-cgmp (FDA explainer on GMP). GMPs include "establishing strong quality management systems, obtaining appropriate quality raw materials, establishing robust operating procedures, detecting and investigating product quality deviations, and maintaining reliable testing laboratories." *Id.* GMPs help "prevent instances of contamination, mix-ups, deviations, failures, and errors." *Id.*

23. Each step in Lilly's process to manufacture its tirzepatide medicines—from sourcing and chemical synthesis of the API to formulation and device assembly and packaging—requires extensive testing and controls and specialized equipment. Lilly's medicines must be, and always are, accompanied with important, FDA-approved labels, instructions, and warnings.

24. Lilly now promotes, offers, and sells MOUNJARO® and ZEPBOUND® medicines in Washington and throughout the United States.

LILLY'S MOUNJARO® AND ZEPBOUND® TRADEMARKS

25. Lilly uses the trademarks MOUNJARO® and ZEPBOUND® (the "Lilly Marks") to identify and promote Lilly's proprietary, FDA-approved medicines with the active pharmaceutical ingredient tirzepatide. Lilly markets and sells MOUNJARO® and ZEPBOUND® throughout the United States using the Lilly Marks.

26. Lilly first adopted and used the MOUNJARO® mark at least as early as June 3, 2022, and has used the MOUNJARO® mark continuously since that time. Lilly has extensively promoted, advertised, and marketed its prescription-only diabetes medicine bearing the MOUNJARO® mark in many different channels, directed both to healthcare professionals and to patients.

27. Lilly is the owner of two federal trademark registrations for MOUNJARO®, U.S. Reg. Nos. 6,809,369 (issued August 2, 2022) and 7,068,463 (issued May 30, 2023). True and correct copies of Plaintiff Lilly's registrations for the MOUNJARO® mark are attached hereto as part of **Exhibit A.** Lilly additionally has several pending applications to register its MOUNJARO® mark in connection with more classes, services, and goods, including U.S. Trademark Ser. Nos. 97/596,856, 97/668,206, and 98/253,743. As a result of its use of the

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MOUNJARO® mark, Lilly also owns valuable common law and other rights in and to the MOUNJARO® mark.

28. Lilly first adopted and used the ZEPBOUND® mark at least as early as November 30, 2023, and has used the ZEPBOUND® mark continuously since that time. Lilly has extensively promoted, advertised, and marketed its prescription-only weight-loss medicine bearing the ZEPBOUND® mark in many different channels, directed both to healthcare professionals and to patients.

29. Lilly is the owner of one federal trademark registration for ZEPBOUND®, U.S. Reg. No. 7,288,373 (issued January 23, 2024). A true and correct copy of Plaintiff Lilly's registration for the ZEPBOUND® mark is attached hereto as part of **Exhibit A.** Lilly additionally has several pending applications to register its ZEPBOUND® mark, including U.S. Trademark Ser. Nos. 97/530,451, 97/530,456, and 98/295,137. As a result of its use of the ZEPBOUND® mark, Lilly also owns valuable common law and other rights in and to the ZEPBOUND® mark.

30. Lilly conceived the Lilly Marks to stand out in the marketplace. The Lilly Marks do not describe any attributes of either medicine and are accordingly inherently distinctive.

31. Lilly promotes, advertises, and markets MOUNJARO® and ZEPBOUND® both to healthcare professionals and to patients, among others, through various channels, including on the websites mounjaro.com, mounjaro.lilly.com, zepbound.com, and zepbound.lilly.com, in social media, in online advertisements, and on television.

32. As a result of Lilly's use, promotion, advertising, and marketing of MOUNJARO® and ZEPBOUND®, the Lilly Marks are exclusively associated with Lilly, serve to identify genuine Lilly products, and are valuable assets of Lilly.

THE RISKS OF COMPOUNDING

33. Upon information and belief, Defendant markets and sells to patients compounded drug products that purport to contain tirzepatide and that are not approved by the FDA or any other global regulatory agency ("Unapproved Compounded Drugs").

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34. Typically, prescription medicines must undergo a rigorous premarket approval process. Federal law creates a narrow exception for compounding, which the FDA defines as a "practice in which a licensed pharmacist, a licensed physician, or, in the case of an outsourcing facility, a person under the supervision of a licensed pharmacist, combines, mixes, or alters ingredients of a drug to create a medication tailored to the needs of an individual patient." https://www.fda.gov/drugs/guidance-compliance-regulatory-information/human-drug-compounding (FDA guidance on drug compounding law compliance). This narrow exception applies, for instance, where a patient cannot safely take a commercially manufactured FDA-approved drug due to an allergy to a particular dye.

35. The Food, Drug, and Cosmetic Act (FDCA), in section 503A, prescribes a rigid set of requirements that compounding pharmacies must meet, including a requirement that compounding occur only "on the prescription order that a compounded product is necessary for the identified patient." This restriction is important because compounding pharmacies are not required to comply with GMP, so they are only permitted to produce a small amount based on the specific needs of specific patients. The FDA has explained the importance of this requirement to ensure that compounding pharmacies "are not actually operating as conventional manufacturers":

> The longer a compounded sterile drug product that has been contaminated is held by a pharmacist or physician before distribution, or held in inventory in a health care facility before administration, the greater the likelihood of microbial proliferation and increased patient harm. Because of these and other risks, the FD&C Act places conditions on compounding that must be met for compounded drugs to qualify for the exemptions in section 503A, [including that] compounding is for an identified individual patient, drugs compounded in advance of receiving prescriptions are compounded only in limited quantities, and drugs are distributed pursuant to a valid patient-specific prescription. These conditions are meant to help ensure that compounding under section 503A is based on individual patient needs, and that entities purportedly operating under section 503A are not actually operating as conventional manufacturers.

https://www.fda.gov/media/97347/download (FDA prescription requirement compliance guidance for industry).

36. As the FDA further explained, "The *prescription requirement* under section 503A is a critical mechanism to distinguish compounding by a licensed pharmacist or licensed

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physician from conventional manufacturing, and to ensure that drug products compounded under section 503A, which are not FDA-approved, are not subject to the requirement that labeling bear adequate directions for use, and are not subject to []GMP requirements, are provided to a patient only based on individual patient need." *Id.* (emphasis in original).

37. Compounders are also limited in their ability to engage in a practice called anticipatory compounding, which is when, "based on a history of receiving prescriptions for a particular drug product to be compounded for an identified individual patient, and in the context of an established relationship with a particular prescriber or patient, a pharmacist or physician will compound a batch of drugs in anticipation of receiving another patient-specific prescription. The compounder then provides the drugs to a patient or health care provider when a prescription for an identified individual patient is received." *Id.* As the FDA further explained:

> [A]nticipatory compounding [] has risks. For example, if a problem occurs during compounding, such as contaminating a drug product that is supposed to be sterile, or producing subpotent or superpotent sterile or non-sterile drugs, it could affect numerous patients, and not just one. Because drug products compounded in accordance with section 503A are exempt from CGMP requirements, there is an inherently greater chance of a production mistake or contamination. Restricting anticipatory compounding to limited quantities serves to limit the number of patients likely to be affected if there are drug product mix-ups or contamination. The limitations on anticipatory compounding in section 503A (i.e., compounding must be in "limited quantities" and based on an "established relationship") help to protect patients from product quality issues. ***These limitations on anticipatory compounding also help to distinguish licensed pharmacists or licensed physicians compounding drug products under section 503A for individual patients from conventional manufacturers, who generally produce larger quantities of drugs that are distributed without a prescription***.

Id. (emphasis added).

38. According to the FDA, "[c]ompounded drugs are not FDA-approved. This means that FDA does not review these drugs to evaluate their safety, effectiveness, or quality before they reach patients." The FDA has warned that: "Compounded drugs . . . do not have the same safety, quality, and effectiveness assurances as approved drugs. Unnecessary use of compounded drugs unnecessarily exposes patients to potentially serious health risks. Because compounded drugs are not FDA-approved, FDA does not verify their safety, effectiveness, or

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quality before they are marketed." https://www.fda.gov/drugs/human-drug-compounding/compounding-and-fda-questions-and-answers (FDA drug compounding FAQ).

39. Health risks from compounded drugs are serious. In 2021, a pharmacist pled guilty to providing adulterated compounded drugs to cataract-surgery patients. The adulterated compounds contained "an excessive amount of an inactive ingredient" that can damage sensitive eye tissue. https://www.fda.gov/inspections-compliance-enforcement-and-criminal-investigations/press-releases/texas-pharmacist-pleads-guilty-adulterating-drug-used-cataract-surgeries (FDA press announcement re guilty plea). At least 68 patients were injected with the adulterated compounds, at two different surgery centers, over a period of months, even though patients suffered near-immediate adverse events, including permanent blindness. https://www.wfaa.com/article/news/do-not-publish-yet/287-5f002ed3-e110-4063-9959-a2e5f54b5097 (WFAA article re outbreak). One patient had believed "every pill you take, every shot you take is tested" and was surprised to learn that compounded drugs were neither fully tested nor deemed safe or otherwise approved by the FDA. *Id.*

40. There are countless other examples of people experiencing serious injury from taking unregulated medicines. Inappropriate drug compounding caused at least 73 reported compounding errors between 2001 and 2019. These errors led to more than 1,562 adverse events and at least 116 deaths. https://www.pewtrusts.org/en/research-and-analysis/data-visualizations/2020/us-illnesses-and-deaths-associated-with-compounded-or-repackaged-medications-2001-19 (U.S. Illnesses and Deaths Associated With Compounded or Repackaged Medications, 2001–19).

41. Lilly has seen problems first-hand for compounded tirzepatide. Lilly has discovered compounded drugs advertised as tirzepatide with safety, sterility, and efficacy problems. Some contain bacteria, high impurity levels, different colors (pink, instead of colorless), or a chemical structure different from the tirzepatide in Lilly's FDA-approved medicines. In at least one instance, Lilly saw nothing more than sugar alcohol. Lilly also has received reports of patients experiencing significant adverse events after being injected with non-Lilly tirzepatide, including a patient who experienced a seizure and was admitted to the Intensive

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Care Unit and other patients who experienced severe allergic reactions. According to the FDA's Adverse Events Reporting System (FAERS), to date, over 150 adverse events associated with compounded or so-called (but not actually) "generic" tirzepatide have been reported, including over 100 "serious cases" and at least 5 deaths.

42. Consequences from compounded drugs may be deadly. In October 2012, compounded drugs contaminated with a fungus were shipped throughout the country and later injected into patients' spines and joints. After these contaminated products were injected into nearly 14,000 patients, more than 60 people died of fungal meningitis. *Id.* Regarding this outbreak, the FDA has written:

> The 2012 fungal meningitis outbreak was not an isolated event. It was the most serious in a long history of serious adverse events associated with contaminated, super-potent, mislabeled, or otherwise poor quality compounded drugs. In addition, many serious adverse events linked to poor quality compounded drugs, including outbreaks of infections and deaths have occurred since then. And, because most compounders do not report adverse events to FDA, the agency may not be aware of adverse events associated with compounded drugs unless a health care provider submits an adverse event report regarding his or her patients or a state official notifies FDA.

https://www.fda.gov/media/102493/download (FDA Compounding Progress Report).

WIDESPREAD SAFETY CONCERNS ABOUT COMPOUNDED TIRZEPATIDE

43. Regulators and law enforcement across the United States and abroad have recognized the safety concerns with compounded tirzepatide and other incretins. They have issued warnings, and in at least one instance, banned incretin compounding.

44. The FDA, for example, has consistently and repeatedly raised its concerns with compounding generally and compounded incretins more specifically. https://www.fda.gov/media/97347/download (FDA prescription requirement compliance guidance for industry). The FDA specifically has targeted compounded tirzepatide as a threat to consumer safety. The Director of the FDA's Office of Unapproved Drugs and Labeling Compliance has issued multiple warning letters to compounding pharmacies purportedly selling compounded tirzepatide products because they are not safe or effective.

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https://www.fda.gov/inspections-compliance-enforcement-and-criminal-investigations/warning-letters/us-chem-labs-669074-02072024 (FDA warning letter re US Chem Labs); https://www.fda.gov/inspections-compliance-enforcement-and-criminal-investigations/warning-letters/synthetix-inc-dba-helix-chemical-supply-668918-02072024 (FDA warning letter re Synthetix Inc. DBA Helix Chemical Supply).

45. Across the country, at least nine state pharmacy boards, along with several state poison centers, have issued guidance and warnings regarding the risks to patients of compounded incretins. The Alabama Board of Pharmacy notified all licensed pharmacists and pharmacies that "even when compounding of [incretins] is allowable under [federal law], . . . the use of any non-pharmaceutical grade active pharmaceutical ingredient (API), or one not produced by an FDA-registered establishment, is prohibited." https://www.albme.gov/press-release/concerns-with-semaglutide-and-other-glp-1-receptor-agonists (Alabama Board of Medical Examiners press release). And the Maryland Poison Control Center warned that buying compounded incretins "online puts people at risk due to the medicine not being regulated and/or being sold from a source that is not licensed," including because those compounded products "have not been evaluated for safety and effectiveness by the FDA." https://blog.mdpoison.com/2024/03/semaglutide (Blog of the Maryland Poison Center).

46. The issue of unsafe compounded drugs purporting to contain tirzepatide has also received international attention. Australia recently banned the development and sale of compounded anti-obesity medications because of "increasing community concern" and "increasing reports of patients coming to harm from" compounded incretin drugs. The ban—effective October 2024—targets compounded drugs that are "being misrepresented and sold as replica [] Mounjaro®." https://www.health.gov.au/ministers/the-hon-mark-butler-mp/media/protecting-australians-from-unsafe-compounding-of-replica-weight-loss-products (Australia Minister for Health and Aged Care press release). As Mark Butler, Australia's Minister for Health, said, "Australians should be able to have faith in the medications they use, including compounded medicines," and the ban "will protect Australians from harm and save lives." *Id.*

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47. Doctors and patient groups recognize the problems with compounded incretins, and they are sharing their concerns, too. The Obesity Society, Obesity Action Coalition, and Obesity Medicine Association, for example, issued a joint statement warning that when people use incretin "alternatives, you may not be getting what you hoped for. You may also get something you did not want (other active substances have been found in some compounded versions)." https://www.obesityaction.org/wp-content/uploads/GLP-1-Compounded-Alternative-Statement_Final_Logos-1.pdf (joint statement from leading obesity expert organizations).

48. Lilly itself has issued multiple public warnings about compounded tirzepatide, including by publishing an open letter.

DEFENDANTS' FALSE ADVERTISING AND TRADEMARK INFRINGEMENT

49. Lilly does not sell MOUNJARO® or ZEPBOUND® to Defendants for resale or redistribution. Nor has Lilly authorized Defendants to use the Lilly Marks in connection with any of Defendants' offered goods or services. On information and belief, therefore, the Unapproved Compounded Drugs sold by Defendants are made by compounding pharmacies, which deliver them to Defendants for prescription, administration, or other dispensing to patients.

50. On information and belief, Defendants do not sell Lilly's MOUNJARO® and ZEPBOUND® and have no association with Lilly. Yet Defendants boldly and falsely appropriate the Lilly Marks to market and sell Unapproved Compounded Drugs purporting to contain tirzepatide. These drugs are ***not*** MOUNJARO® or ZEPBOUND®. Rather, Defendants pass off Unapproved Compounded Drugs as MOUNJARO® or ZEPBOUND®. Defendant's unlawful use of the Lilly Marks can only be intended to deceptively lure in patients in pursuit of revenues and profits.

51. Because Defendants are not offering genuine MOUNJARO® or ZEPBOUND®, Lilly has no control over the safety, quality, or effectiveness of the Unapproved Compounded Drugs sold by Defendants.

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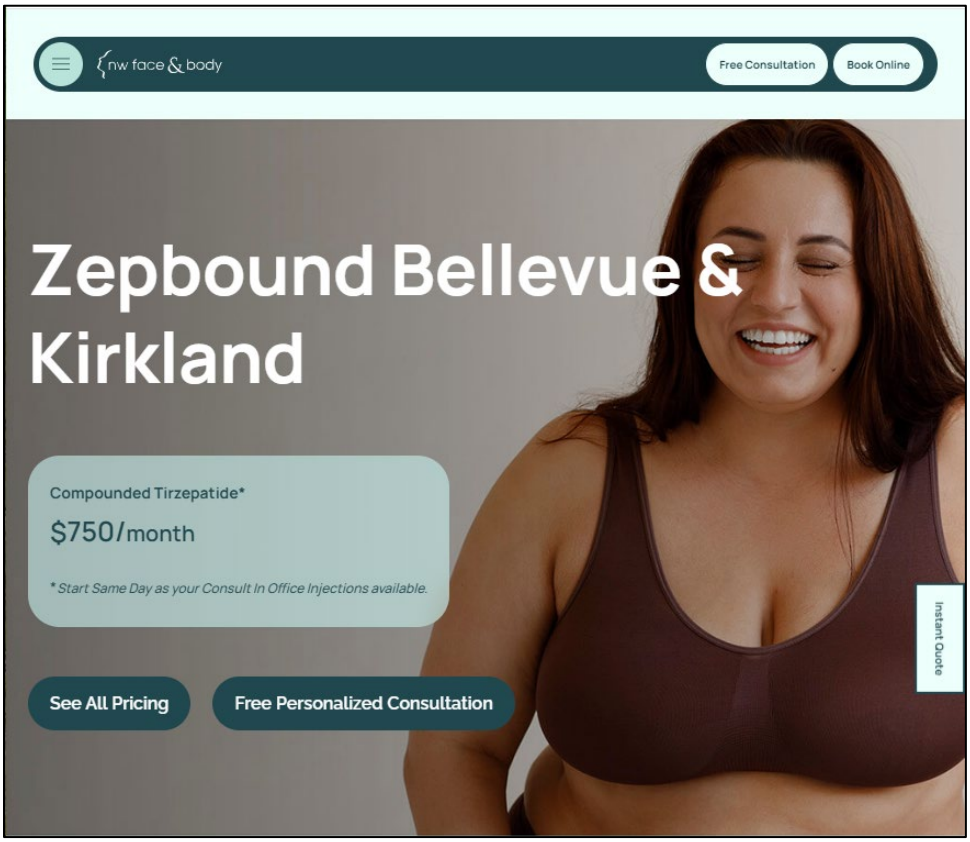
52. This is all the more concerning given that, on April 12, 2024, this Court found Defendants' Alderwood, Northwest, and Sajan had illegally prevented patients from posting negative reviews of their businesses online, in violation of Washington State's Consumer Review Fairness Act. *See Washington v. Alderwood Surgical Center, LLC*, No. 22 Civ. 1835, 2024 WL 1606143 (W.D. Wash. Apr. 12, 2024). Because Defendants prevented patients from posting accurate reviews of their businesses online, prospective patients may have insufficient notice as to the nature or quality of Defendants' services.

53. Examples of Defendants' trademark infringement and false advertising are shown below and are attached hereto as **Exhibit B**.

54. An example of Defendants' unauthorized use of the Lilly Marks, from Defendant Northwest's website, is shown below.



55. As the image shows, Defendant Northwest promotes its Unapproved Compounded Drugs with the header "Zepbound Bellevue & Kirkland," and only in smaller font

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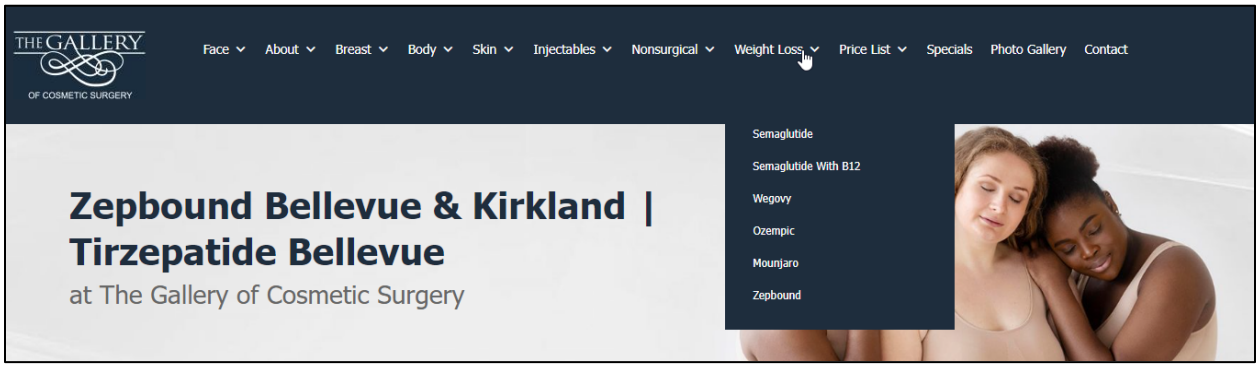
clarifying that what is actually for sale is "Compounded Tirzepatide*". A similar page to this one appears on the website associated with each of Defendants' trade names.

56. These webpages are even labeled "Zepbound" in Defendants' directories, as shown below in a screengrab from the Gallery of Cosmetic Surgery's website.



57. On Defendant Northwest's version of this "Zepbound" webpage, Defendant Northwest uses the word "Zepbound" ***28 times*** as part of selling its Unapproved Compounded Drugs. Defendant Alderwood similarly uses the word "Zepbound" ***24 times***, ***33 times***, and an astonishing ***36 times*** on the "Zepbound" webpages on the websites of Seattle Plastic Surgery, Gallery of Cosmetic Surgery, and Allure Esthetic respectively—all while ***not selling ZEPBOUND®***.

58. Defendants' websites convey the unmistakable impression that Defendants are offering for sale Lilly's MOUNJARO® and ZEPBOUND®, and/or an FDA-approved generic version thereof. But Lilly is the only approved source of MOUNJARO® and ZEPBOUND® in the United States, and Lilly does not sell either medicine to Defendants for resale or redistribution. Moreover, there are ***no*** generic versions of either MOUNJARO® and ZEPBOUND®.

59. Defendants first started using the Lilly Marks to advertise their Unapproved Compounded Drugs long after Lilly had adopted them. Defendants' use can only have been intended to benefit from the goodwill Lilly generated around the Lilly Marks.

60. Defendants also falsely advertise their Unapproved Compounded Drugs on their websites by making statements that claim or imply that their Unapproved Compounded Drugs

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are FDA-approved and have been proven to achieve certain therapeutic outcomes. These statements rely on the FDA's approval of ***Lilly's*** medicines and clinical trials for ***Lilly's*** medicines. These studies and approvals have no bearing on, and cannot substantiate claims about, Defendants' Unapproved Compounded Drugs, which upon information and belief are sold without having undergone any clinical trials on safety and effectiveness.

61. For example, as shown below, Defendants' "Seattle Zepbound Weight Loss Program" webpage on the Allure Esthetic' website (https://www.allureesthetic.com/body/zepbound-seattle/)—which, again, is used to sell Unapproved Compounded Drugs rather than genuine ZEPBOUND®—includes an entire section devoted explaining that "Zepbound Seattle" (a non-existent product) "is an FDA-approved medication."

> Zepbound Seattle is an FDA-approved medication that promotes weight loss and helps patients achieve their fitness goals. Zepbound is an FDA-approved, tirzepatide-based medication that interacts with the body's hormones that respond to food. By replicating the same response, Zepbound works to curb the appetite and prevent patients from overeating.

62. Defendants' statements that ZEPBOUND® is FDA-approved can only be intended to deceive Defendants' patients, who Defendants provide with non-FDA-approved non-ZEPBOUND® Unapproved Compounded Drugs.

63. Upon information and belief, these statements are false and/or misleading as to Defendants' Unapproved Compounded Drugs, which are ***not*** FDA approved, were ***not*** the subject of any clinical trials, and are ***not*** clinically proven to achieve any results.

64. Defendants continue to use the Lilly Marks, including in advertising and promotion on their websites, to deceive patients who, upon information and belief, are seeking to buy genuine FDA-approved MOUNJARO® and/or and ZEPBOUND® to treat their serious health conditions.

65. Defendants' prominent and misleading use of the Lilly Marks is likely to cause consumers to falsely believe that they are purchasing MOUNJARO® and/or ZEPBOUND®, that

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Defendants are a source for Lilly's FDA-approved treatment options MOUNJARO® and/or ZEPBOUND®, that Defendants' Unapproved Compound Drugs are as safe and effective as Lilly's FDA-approved treatment options MOUNJARO® and ZEPBOUND®, and/or that Defendants' services are provided, licensed, sponsored, authorized, or approved by, or otherwise associated or affiliated with, Lilly.

66. Defendants' use of the Lilly Marks is without the permission, consent, or authorization of Lilly. Defendants have no right to use, and Defendants know that they have no right to use, the Lilly Marks in connection with Defendants' Unapproved Compounded Drugs or otherwise. Defendants' advertising and promotional materials are false and misleading where they suggest and/or state an association with Lilly's FDA-approved MOUNJARO® and ZEPBOUND®, because no such association exists.

67. There is no need for Defendants to use the Lilly Marks to advertise or promote their Unapproved Compounded Drugs purporting to contain tirzepatide, other than to trade upon Lilly's reputation and to create confusion in the marketplace and/or mislead patients with serious health conditions regarding the origin, identity, or source of Defendants' Unapproved Compounded Drugs.

68. Defendants' unauthorized use of the Lilly Marks is intended—and likely—to cause confusion, to cause mistake, or to deceive, and infringes Lilly's established exclusive rights in the Lilly Marks.

69. Upon information and belief, unless enjoined by this Court, Defendants will continue to use the Lilly Marks and/or otherwise falsely advertise their Unapproved Compounded Drugs as associated with or being MOUNJARO® and ZEPBOUND®, all in violation of Lilly's rights.

HARM TO THE PEOPLE OF WASHINGTON AND LILLY

70. Lilly's FDA-approved MOUNJARO® and ZEPBOUND® medications have undergone extensive clinical trials and approval processes. But these clinical studies and FDA approvals only apply to genuine Lilly MOUNJARO® and ZEPBOUND® used as directed by a prescribing physician. The clinical trials and approval processes do not inform the safety,

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quality, or effectiveness of Defendant's Unapproved Compounded Drugs.

71. Defendants' unlawful, misleading business model may expose patients to the serious risks described above. Critically, because Defendants falsely advertise and, without Lilly's consent, uses the Lilly Marks in connection with their Unapproved Compounded Drugs, patients are unlikely to know the unique risks associated with Defendant's untested, unapproved drugs.

72. Defendants advertise themselves as providing MOUNJARO® and ZEPBOUND® (or their supposed "generic" equivalents), when, in reality, Defendants provide untested Unapproved Compounded Drugs. Defendants' promotional tactics are ***intended*** to mislead patients into believing that Unapproved Compounded Drugs are backed by clinical trials and have been approved by the FDA, when no such studies have been conducted, and neither the FDA nor any other regulatory body has approved them. Patients who take Defendants' Unapproved Compounded Drugs and suffer harm will have had no forewarning.

73. Not only does this deceitful content expose the people of Washington to serious health risks, but Defendants' unlawful tactics undermine the name, goodwill, and reputation that Lilly has invested heavily in developing. Moreover, Defendants' unfair methods allow them and their suppliers of Unapproved Compounded Drugs to unjustly profit from sales to patients looking for MOUNJARO® and ZEPBOUND®.

FIRST CAUSE OF ACTION
Trademark Infringement
in Violation of 15 U.S.C. § 1114

74. Lilly repeats and realleges each and every allegation above as if fully set forth herein.

75. Lilly is the owner of all right, title, and interest in federal trademark registrations for the inherently distinctive Lilly Marks and has standing to maintain an action for trademark infringement under 15 U.S.C. § 1114.

76. Without Lilly's consent, Defendants have used and continue to use in commerce the Lilly Marks in connection with the offering, sale, and advertising of their Unapproved Compounded Drugs purporting to contain tirzepatide. Consumers who encounter Defendants'

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unauthorized use of the Lilly Marks in connection with Defendants' Unapproved Compounded Drugs and related goods and services are likely to think that they are provided, licensed, sponsored, authorized, or approved by, or otherwise associated or affiliated with, Lilly.

77. Defendants' actions are likely to cause confusion, or to cause mistake, or to deceive, and thus constitute trademark infringement of the registered Lilly Marks, in violation of Section 32 of the Lanham Act, 15 U.S.C. § 1114.

78. Defendants had actual and/or constructive knowledge of Lilly's rights prior to their infringing use of the Lilly Marks. The actions of Defendants alleged above have at all times relevant to this action been willful.

79. As a direct and proximate result of the actions of Defendants alleged above, Lilly has been damaged and will continue to be damaged. Defendants' conduct, unless enjoined by the Court, will further impair the value of the Lilly Marks' name, reputation, and goodwill. This harm constitutes an injury for which Lilly has no adequate remedy at law.

80. This is an exceptional case under 15 U.S.C. § 1117.

81. Based on such conduct, Lilly is entitled to injunctive relief as well as monetary damages, and other remedies provided by Sections 1116, 1117, and 1118, including Defendants' profits, treble damages, reasonable attorneys' fees, costs, and prejudgment interest.

SECOND CAUSE OF ACTION
Trademark Infringement, False Designation of Origin and Unfair Competition in Violation of 15 U.S.C. § 1125

82. Lilly repeats and realleges each and every allegation above as if fully set forth herein.

83. Lilly is the owner of all right, title, and interest in the inherently distinctive Lilly Marks and has standing to maintain an action for trademark infringement, false designation of origin, and unfair competition under 15 U.S.C. § 1125.

84. Without Lilly's consent, Defendants have used and continue to use in commerce the Lilly Marks in connection with the offering, sale, and advertising of their Unapproved Compounded Drugs purporting to contain tirzepatide. Consumers who encounter Defendants'

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unauthorized use of the Lilly Marks in connection with Defendants' Unapproved Compounded Drugs and related goods and services are likely to think that they are provided, licensed, sponsored, authorized, or approved by, or otherwise associated or affiliated with, Lilly.

85. Defendants' actions are likely to cause confusion, or to cause mistake, or to deceive as to the origin, sponsorship, or approval of the products and services and commercial activities of Defendants, and thus constitute trademark infringement, false designation of origin, and unfair competition with respect to the Lilly Marks, in violation of Section 43(a)(1)(A) of the Lanham Act, 15 U.S.C. § 1125(a)(1)(A).

86. Defendants had actual and/or constructive knowledge of Lilly's rights prior to their infringing use of the Lilly Marks. The actions of Defendants alleged above have at all times relevant to this action been willful.

87. As a direct and proximate result of the actions of Defendants alleged above, Lilly has been damaged and will continue to be damaged. Defendants' conduct, unless enjoined by the Court, will further impair the value of the Lilly Marks' name, reputation, and goodwill. This harm constitutes an injury for which Lilly has no adequate remedy at law.

88. This is an exceptional case under 15 U.S.C. § 1117.

89. Based on such conduct, Lilly is entitled to injunctive relief as well as monetary damages, and other remedies provided by Sections 1116, 1117, and 1118, including Defendant's profits, treble damages, reasonable attorneys' fees, costs, and prejudgment interest.

THIRD CAUSE OF ACTION
False and Misleading Advertising and Promotion in Violation of 15 U.S.C. § 1125(a)(1)(B)

90. Lilly repeats and realleges each and every allegation above as if fully set forth herein.

91. Defendants' commercial advertising claims described herein are false and misleading in violation of Section 43(a)(1)(B) of the Lanham Act, 15 U.S.C. § 1125(a)(1)(B).

92. Defendants have knowingly and willfully made material false and misleading statements in their commercial advertisements for their Unapproved Compounded Drugs, and these statements regarding Unapproved Compounded Drugs' safety, quality, effectiveness, and

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regulatory status have influenced and are likely to continue to influence consumers' purchasing decisions.

93. Defendants' statements—including their various literally false claims—have the tendency to deceive a substantial segment of consumers, who have relied or likely will rely on Defendants' false statements in making their tirzepatide-based medicine purchase decisions.

94. Defendants have caused their false statements to enter interstate trade or commerce.

95. As a direct and proximate result of Defendants' false and deceptive campaign, Lilly is suffering immediate and continuing irreparable injury for which there is no adequate remedy at law.

96. As a direct and proximate result of Defendants' false and deceptive campaign, Lilly has suffered and will continue to suffer significant monetary damages and discernible competitive injury by the direct diversion of sales from Lilly to Defendants and Defendants' suppliers and by a loss of goodwill associated with Lilly's MOUNJARO® and ZEPBOUND® and the Lilly Marks.

97. This is an exceptional case under 15 U.S.C. § 1117.

98. Lilly is entitled to injunctive relief as well as monetary damages, and other remedies provided by Sections 1116, 1117, and 1118, including Defendants' profits, treble damages, reasonable attorneys' fees, costs, and prejudgment interest.

FOURTH CAUSE OF ACTION
Unfair and Deceptive Trade Practices in Violation of RCW 19.86.010 *et seq.*

99. Lilly repeats and realleges each and every allegation above as if fully set forth herein.

100. Defendants' acts constitute unfair and deceptive trade practices, in violation of the laws of the State of Washington, including RCW 19.86.010 *et seq.*

101. RCW 19.86.010 states that "Unfair methods of competition and unfair or deceptive acts or practices in the conduct of any trade or commerce are hereby declared unlawful."

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102. Plaintiff is a "person" within the meaning of RCW 19.86.090 and has standing to bring an action based on unfair and deceptive trade practices.

103. Defendants' acts unethically exploit the Lilly Marks in a material manner likely to deceive and mislead, and therefore be substantially injurious to, the public, including a substantial portion of consumers. These acts therefore offend the established public policy of the State of Washington.

104. Defendants' acts include making false or misleading representations in their advertising and promotional materials in a material manner likely to deceive and mislead, and therefore be substantially injurious to, the public, including a substantial portion of consumers. These acts therefore offend the established public policy of the State of Washington.

105. The public interest is harmed by Defendants' conduct because such conduct has the capacity to injure any of Defendants' patients or prospective patients. Members of the public are likely to suffer injury from Defendants' acts by purchasing Defendants' Unapproved Compounded Drugs that they believe to be Lilly's MOUNJARO® or ZEPBOUND®.

106. Defendants' Unapproved Compounded Drugs do not have the same safety, quality, and effectiveness as MOUNJARO® or ZEPBOUND®. Defendants' deceptive conduct and regulatory non-compliance therefore enabled it to obtain an unfair and illegal business advantage over Lilly.

107. Upon information and belief, Defendants' deceptive, unfair, and fraudulent business practices were willfully undertaken, as described in the allegations above.

108. As a direct and proximate result of Defendants' unfair and deceptive trade practices, Lilly has suffered and will continue to suffer significant monetary damages and discernible injury to its business, including by a loss of goodwill associated with Lilly's MOUNJARO® and ZEPBOUND® medicines and the Lilly Marks. Defendants therefore have unfairly profited from the actions alleged.

109. By reason of Defendants' acts, Lilly's remedy at law is not adequate to compensate for the injuries inflicted by Defendants. Accordingly, Lilly is entitled to entry of

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preliminary and permanent injunctive relief, in addition to treble damages, attorneys' fees, and costs.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Lilly prays that this Court enter judgment in its favor on each and every claim for relief set forth above and award it relief including, but not limited to, the following:

1. An Order declaring that Defendants:

   a. Infringed the federally registered Lilly Marks, in violation of 15 U.S.C. § 1114(1);

   b. Infringed the Lilly Marks and engaged in trademark infringement, false designation of origin, and unfair competition, in violation of 15 U.S.C. § 1125(a)(1)(A);

   c. Engaged in false and misleading advertising and promotion, in violation of 15 U.S.C. § 1125(a)(1)(B);

   d. Engaged in unfair and deceptive trade practices in violation of RCW 19.86.010 *et seq.*;

   e. That each of the above acts was willful and knowing;

2. An injunction preliminarily and then permanently enjoining and restraining Defendants and their officers, agents, servants, employees, and attorneys and all persons acting in concert or participation with any of them, from:

   a. Using the Lilly Marks or any mark confusingly similar to them, in connection with the advertising, promoting, marketing, selling or offering for sale of any goods or services (including, but not limited to, Unapproved Compounded Drugs) or otherwise engaging in any activity that is likely to cause confusion, cause mistake, or deceive or otherwise infringe any rights of Plaintiff Lilly in the Lilly Marks or any similar mark;

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b. Falsely stating or suggesting that Defendants' Unapproved Compounded Drugs are genuine or generic versions of MOUNJARO® or ZEPBOUND®, that Defendants are associated or connected in any way with Plaintiff or its products, or that Defendants' Unapproved Compounded Drugs are approved by the FDA, have been the subject of clinical studies, or achieve certain therapeutic outcomes;

c. Engaging in any unfair competition with Plaintiff Lilly; and

d. Engaging in any deceptive or unfair acts;

3. An Order Requiring Defendants and their officers, agents, servants, employees, and attorneys and all persons acting in concert or participation with any of them, to engage in corrective advertising by informing consumers that Defendants are not and never have been authorized by, affiliated with, sponsored by, approved by, or related to Plaintiff Lilly or MOUNJARO® and ZEPBOUND®, that Defendants' Unapproved Compounded Drugs are not MOUNJARO® or ZEPBOUND®, that Defendants' Unapproved Compounded Drugs are not generic MOUNJARO® or generic ZEPBOUND®, that Defendants' Unapproved Compounded Drugs have never been genuine or generic versions of MOUNJARO® and ZEPBOUND®, and that Defendants' Unapproved Compounded Drugs are not and have never been approved or reviewed by the FDA or tested for safety, quality, or effectiveness in clinical trials;

4. An Order directing Defendants to file with this Court and serve on Lilly's attorneys, thirty days after the date of entry of any injunction, a report in writing and under oath setting forth in detail the manner and form in which they have complied with the Court's injunction;

5. An Order requiring Defendants to account for and pay to Lilly any and all profits arising from the foregoing acts of infringement, false designation of origin, false advertising, and unfair and deceptive trade practices;

6. An Order requiring Defendants to pay Lilly compensatory damages in an amount as yet undetermined caused by the foregoing acts of infringement, false designation of origin,

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false advertising, and unfair competition, and trebling such compensatory damages for payment to Lilly in accordance with 15 U.S.C. § 1117 and other applicable laws;

7. An Order for pre-judgment and post-judgment interest on all damages;

8. An Order requiring Defendants to pay Lilly all types of monetary remedies available under Washington state law in amounts as of yet undetermined caused by the foregoing acts of unfair and deceptive trade practices;

9. An Order requiring Defendants to pay Lilly's costs and attorney's fees in this action pursuant to 15 U.S.C. § 1117, Washington state law, and any other applicable provision of law;

10. Other relief as the Court may deem appropriate.

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Dated: June 20, 2024

Respectfully submitted,

/s/ Jason Sykes

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JURY DEMAND

Lilly hereby demands a jury trial for all issues so triable.

/s/ Jason Sykes

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EXHIBIT A

United States of America
United States Patent and Trademark Office

MOUNJARO

Reg. No. 6,809,369

Registered Aug. 02, 2022

Int. Cl.: 5

Trademark

Principal Register

Eli Lilly and Company (INDIANA CORPORATION)
Lilly Corporate Center
Indianapolis, INDIANA 46285

CLASS 5: Pharmaceutical preparations, namely, pharmaceutical preparations for the treatment of diabetes

FIRST USE 6-3-2022; IN COMMERCE 6-3-2022

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

SER. NO. 88-680,946, FILED 11-05-2019

Katherine Kelly Vidal

Director of the United States
Patent and Trademark Office

REQUIREMENTS TO MAINTAIN YOUR FEDERAL TRADEMARK REGISTRATION

WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.

Requirements in the First Ten Years*
What and When to File:

- ***First Filing Deadline:*** You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. See 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.

- ***Second Filing Deadline:*** You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between the 9th and 10th years after the registration date.* See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*
What and When to File:

- You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the United States Patent and Trademark Office (USPTO). The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. See 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. See 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see http://www.wipo.int/madrid/en/.

NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at http://www.uspto.gov.

NOTE: A courtesy e-mail reminder of USPTO maintenance filing deadlines will be sent to trademark owners/holders who authorize e-mail communication and maintain a current e-mail address with the USPTO. To ensure that e-mail is authorized and your address is current, please use the Trademark Electronic Application System (TEAS) Correspondence Address and Change of Owner Address Forms available at http://www.uspto.gov.

United States of America
United States Patent and Trademark Office

MOUNJARO

Reg. No. 7,068,463

Registered May 30, 2023

Int. Cl.: 44

Service Mark

Principal Register

Eli Lilly and Company (INDIANA CORPORATION)
Lilly Corporate Center
Indianapolis, INDIANA 46285

CLASS 44: Medical information services in the field of diabetes

FIRST USE 6-7-2022; IN COMMERCE 6-7-2022

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

SER. NO. 97-468,410, FILED 06-21-2022

Katherine Kelly Vidal

Director of the United States
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REQUIREMENTS TO MAINTAIN YOUR FEDERAL TRADEMARK REGISTRATION

WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.

Requirements in the First Ten Years*
What and When to File:

- ***First Filing Deadline:*** You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. See 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.

- ***Second Filing Deadline:*** You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between the 9th and 10th years after the registration date.* See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*
What and When to File:

- You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the United States Patent and Trademark Office (USPTO). The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. See 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. See 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see http://www.wipo.int/madrid/en/.

NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at http://www.uspto.gov.

NOTE: A courtesy e-mail reminder of USPTO maintenance filing deadlines will be sent to trademark owners/holders who authorize e-mail communication and maintain a current e-mail address with the USPTO. To ensure that e-mail is authorized and your address is current, please use the Trademark Electronic Application System (TEAS) Correspondence Address and Change of Owner Address Forms available at http://www.uspto.gov.

United States of America
United States Patent and Trademark Office

ZEPBOUND

Reg. No. 7,288,373

Registered Jan. 23, 2024

Int. Cl.: 5

Trademark

Principal Register

Eli Lilly and Company (INDIANA CORPORATION)
Lilly Corporate Center
Indianapolis, INDIANA 46285

CLASS 5: Pharmaceutical preparations, namely, pharmaceutical preparations for the treatment of obesity

FIRST USE 11-30-2023; IN COMMERCE 11-30-2023

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

SER. NO. 97-362,818, FILED 04-14-2022

Katherine Kelly Vidal

Director of the United States
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REQUIREMENTS TO MAINTAIN YOUR FEDERAL TRADEMARK REGISTRATION

WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.

Requirements in the First Ten Years*
What and When to File:

- ***First Filing Deadline:*** You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. See 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.

- ***Second Filing Deadline:*** You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between the 9th and 10th years after the registration date.* See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*
What and When to File:

- You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the United States Patent and Trademark Office (USPTO). The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. See 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. See 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see http://www.wipo.int/madrid/en/.

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NOTE: A courtesy e-mail reminder of USPTO maintenance filing deadlines will be sent to trademark owners/holders who authorize e-mail communication and maintain a current e-mail address with the USPTO. To ensure that e-mail is authorized and your address is current, please use the Trademark Electronic Application System (TEAS) Correspondence Address and Change of Owner Address Forms available at http://www.uspto.gov.

EXHIBIT B

Start medication on the date of your consultation!

ZEPBOUND, SEATTLE

SEATTLE PLASTIC SURGERY

Instant Quote

COMPOUNDED TIRZEPATIDE*

$750/MONTH

(includes a medication, necessary supplies, diet & exercise plan, and the consultation and monthly follow up appointments)

**Start Same Day as your Consult In Office Injections available*

Free In Person & Virtual Semaglutide Consultation

Start Booking

THE PREMIUM BENEFITS WITH OUR WEIGHT LOSS PROGRAMS

THE SUPPLIES WE PROVIDE:

- Monthly provider visits
- 24/7 on call provider
- Diet Plan that works well with medication
- Exercise plan that works well with medication
- Caddy
- Syringes
- Bandaids
- Alcohol pads
- Guaz

Weight loss can be difficult for many people. As our world evolves, so do the techniques, diets, and workouts that promote weight loss. However, many of these diets and workouts are extreme, physically demanding, and not sustainable. While losing weight can make a difference in someone's health, it can be disheartening to cycle through numerous techniques with little to no success.

Seattle Plastic Surgery is changing the game for those who struggle to lose weight with

tirzepatide medications. Zepbound is a tirzepatide prescription that can help patients achieve healthy and sustainable weight loss without worrying about fad diets, extreme workouts, or chronic weight fluctuation.

HOW DOES ZEPBOUND WORK?

Zepbound is a tirzepatide medication that allows patients to lose close to twenty percent of their body weight and develop healthier habits. There are a few areas this medication targets that make it so successful for weight loss. Here is a breakdown of how Zepbound, Seattle works for those who want to lose weight:

- **Targets Hunger Hormones:** Zepbound targets duel-hunger hormones known as the GLP-1 and GIP hormones. These control our internal response to the food we ingest. Tirzepatide medication replaces this response and tells the brain we are full faster.
- **Gets Rid Of Snacking:** Zepbound Seattle decelerates the digestive process and keeps you full for extended portions of the day. This helps eliminate unhealthy choices and excess snacking during the day.
- **Blood Sugar Regulation:** Tirzepatide medication lowers blood sugar levels to help regulate it after eating. This can help promote a healthier response to the food you intake.

On Zepbound, most patients see a drastic decrease in weight and experience a healthier lifestyle.

WHO CAN TAKE ZEPBOUND?

Who can take Zepbound Seattle depends on the clinic and the individual challenges one faces. However, at Seattle Plastic Surgery, we do not have any BMI limits for those seeking tirzepatide for weight loss. Weight loss is based on the individual, not the measurement of the BMI scale.

Our clinic provides an in-depth weight loss consultation to ensure you can safely begin our treatment. During this consultation, we will help you find the right medication and program for your new health journey.

BENEFITS OF ZEPBOUND WEIGHT LOSS

The benefits of tirzepatide-based medications for weight loss are outstanding but made even better at in-depth clinics like Seattle Plastic Surgery. Our experienced weight loss providers understand the tools necessary for creating sustainable health. Some of our Zepbound Seattle benefits include:

- Drastic decrease in weight
- Eliminate unhealthy eating
- Can increase metabolism
- Work with a clinic that provides an in-depth weight-loss program
- Weight loss that sticks
- Long-term solution
- Avoid crash diets or weight fluctuation
- Start a lifestyle that promotes health
- Work with the leading weight loss experts in Seattle

At Seattle Plastic Surgery, we ensure every patient can experience a safe and easy weight loss journey.

WHAT ARE THE RISKS?

While there are fewer risks associated with Zepbound Seattle than semaglutide medications, there are some risks and side effects that can occur. These risks include:

- Upset stomach
- Acid reflux

- Urination complications
- Trouble using the restroom
- Allergic reaction to the medication (low possibility)
- Difficulty swallowing or breathing (low possibility)
- Redness or swelling around the injection
- Swelling in the face (low possibility)

At Seattle Plastic Surgery, the weight loss providers help patients navigate any early side effects by providing a B vitamin to help ease their symptoms. Most side effects are early on and slowly fade as the body adjusts to the medication.

SEATTLE ZEPBOUND WEIGHT LOSS PROGRAM

Seattle Plastic Surgery doesn't just offer tirzepatide for weight loss. They walk every patient through the process and stay with them on their journey. At our clinic, we aim to create sustainable changes to help you achieve weight loss that works.

THE CONSULTATION

Your Zepbound weight loss journey will begin with a consultation with one of our experienced weight loss providers. This meeting can be held either at our office or over a video call to accommodate your schedule. During this consultation, you must disclose information to help them ensure you can safely begin the treatment. This information may include:

- Personal medical history
- Family medical history
- Past and current prescriptions
- Personal experience with weight loss
- Current weight
- Health habits and overall way of living

This information helps your provider determine the correct dosage and weight loss plan to benefit your unique physique.

TIRZEPATIDE DOSAGE

At Seattle Plastic Surgery, we provide personalized, compounded tirzepatide dosage for your weight loss. Because weight loss can be influenced by genetics and lifestyle, we understand that it will never be a linear process. Our providers will start you at a lower dose and slowly increase depending on your response and possible side effects.

Our Zepbound weight loss is a self-injected medication that should be administered once a week. However, if you are nervous about self-injecting the medication, our providers are here to help you learn how to self-inject. You can also come into the office weekly to have the injections administered.

HEALTH PROGRAMS

Our weight loss providers have compiled comprehensive diet and exercise guides to help you get the best results from Zepbound, Seattle. Studies have shown that patients who change their diets and begin working out get better results from Zepbound than those who do not. Our guides include a nutrition program that is easy to add to your daily routine and exercises that work with your lifestyle.

24/7 CARE

At Seattle Plastic Surgery, our weight loss providers are on call to provide care and advice for every patient. We also provide monthly check-ins to keep up with your unique Zepbound journey. During these check-ins, your provider can adjust the dose of your medication and check in on where your weight is. This will help you easily manage your weight loss and find balance in your journey.

FREQUENTLY ASKED QUESTIONS

How Much Weight Loss Can I Expect?

The amount of weight you can lose on tirzepatide-based medications depends on your

genetics and lifestyle. However, many patients see a drastic decrease in their weight and can lose up to twenty percent of their body fat. If you maintain good nutrition and healthy physical activity, you can experience an incredible decrease in weight.

Is Zepbound Long-Term?

Medications like Zepbound Seattle are meant to be a sustainable option for weight loss. You can stay on these medications long-term as they help you not only lose weight but keep it off. If you are thinking of stopping the medication, our expert providers recommend slowly decreasing the dose rather than quitting immediately. This can help prevent unwanted weight gain.

How Much Does Zepbound Cost In Seattle?

At Seattle Plastic Surgery, we offer compounded tirzepatide for the same price as regular tirzepatide medications. Our price is $750 monthly, including medication, supplies, consultation, adjustable doses, monthly visits, and health programs.

THE BEST ZEPBOUND WEIGHT LOSS PROGRAM IN SEATTLE

Seattle Plastic Surgery isn't bragging when they say they provide the best tirzepatide weight loss program in Seattle; they're being honest. Most clinics provide the medication but don't provide the additional care necessary for creating healthy weight loss. At our clinic, our providers care about your journey and want to help you create sustainable, healthy habits. When you choose Seattle Plastic Surgery, you know you are getting the best Zepbound weight loss in Seattle.

TINA, PA-C

WEIGHT LOSS SPECIALIST

Tina was born and raised in Fort Worth, Texas, but left her home state to explore the mountains of Washington. Drawn to the aesthetic medicine business, Tina graduated from UT Southwestern Medical Center in Dallas as a certified Physician Assistant. Before she graduated, she knew he wanted to relocate to Seattle and join our company. Her love for helping patients grow and her incredible knowledge brought her to our team!

READ MORE

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SEATTLE ZEPBOUND WEIGHT LOSS PROGRAM

Start medication on the date of your consultation!

Free In Person & Virtual Zepbound Consultations

Compounded Tirzepatide*

$750 per month

(includes a medication, necessary supplies, diet & exercise plan, and the consultation and monthly follow up appointments)

**Start Same Day as your Consult In Office Injections available*

- ☑ Monthly provider visits
- ☑ 24/7 on call provider
- ☑ Diet Plan that works well with medication
- ☑ Exercise plan that works well with me
- ☑ We provide all supplies and travel friendly

Supplies we provide include

- ☑ Caddy
- ☑ Syringes
- ☑ Bandaids
- ☑ Alcohol pads

caddy.

☑ Guaz

In today's day

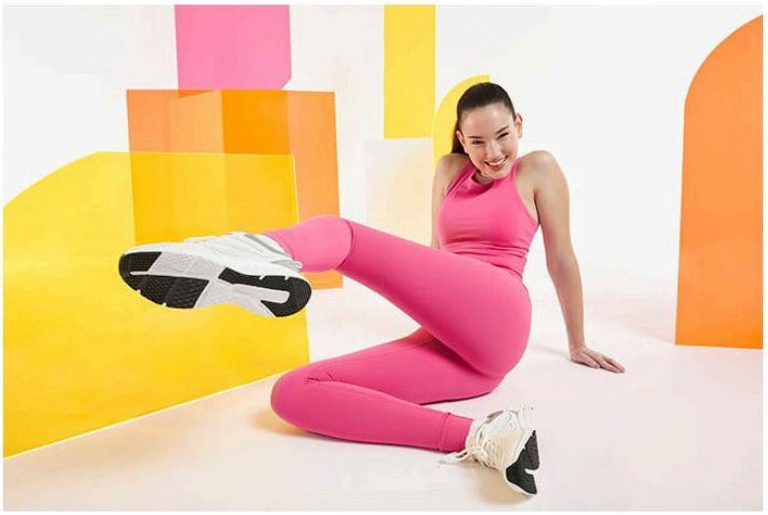
and age, weight loss is a topic that many of us approach with caution. While weight loss can be important to one's health and quality of life, it can also be highly challenging to achieve through diet and exercise. Our genetics are different, and some don't respond as well to these methods, as their predisposition is to carry more weight. Additionally, diet and workout culture can be confusing and frustrating.

Yo-yo dieting can hurt your health; extreme workouts can exhaust your body but not shed weight. Knowing which will work for your body can be tricky, with every fitness influencer promoting a different exercise style and thousands of weight loss diets. However, modern technology has found an incredible medication that allows patients to lose weight and uncover a new, healthy lifestyle that works for their life and physique. Zepbound is the latest medication to help patients achieve their ideal weight and live better.

What Is Zepbound?

Zepbound Seattle is an FDA-approved medication that promotes weight loss and helps patients achieve their fitness goals. Zepbound is an FDA-approved, tirzepatide-based medication that interacts with the body's hormones that respond to food. By replicating the same response, Zepbound works to curb the appetite and prevent patients from overeating.

This incredibly powerful medication can help patients lose up to 20% of their body weight and can help prevent complications from weight like a heart attack or stroke.



How Does Zepbound Work?

Zepbound Seattle has a couple of different internal interactions that make it a successful weight loss prescription. Zepbound is a tirzepatide weight loss medication that interacts with two different types of hormones that control our response to food. The GLP-1 and GIP hormones control our appetite and hunger. By

replacing this response, Zepbound helps to create a full feeling quickly and prevents you from overeating or unhealthy snacking.

The second thing this Seattle tirzepatide medication does is slow down the digestive process, keeping you satisfied for more extended periods of time. This allows you to avoid unnecessary snacks throughout the day and prevents you from craving junk food.

The last thing Zepbound benefits is your blood sugar and glucose levels. It can help balance your blood sugar and keep your body from producing too much.

The Benefits Of Zepbound

At Allure Esthetic, Zepbound Seattle offers outstanding and often unbelievable benefits for patients struggling to lose weight. Living life when you are overweight can be exhausting and taxing on your health. While diet and exercise are essential to staying healthy, they do not always elicit the response most people seek. With Zepbound, patients can experience weight loss and find their perfect balance in life. Certain benefits from Zepbound treatment at Allure Esthetic include:

- Weight loss (can lose up to 20% of body weight)
- Reduced cravings for unhealthy foods
- May help boost metabolism
- Find a nutritional program that works for you
- May prevent complications like heart attack or stroke
- Can help promote sustainable weight loss
- No yo-yo dieting or significant weight fluctuations
- Help with finding the exercise routines that work best for you
- Creates a healthier lifestyle
- A program designed by the leading weight loss experts in Seattle

No BMI Limit

At Allure Esthetic, the providers don't require a BMI limit to begin Zepbound treatment. They believe everyone is different and don't want to prevent those who need medication for weight loss. Instead, the Seattle weight loss experts use an in-depth consultation to determine if a patient will benefit from Zepbound. The consultation will also help them ensure you can safely begin the program.

Zepbound Weight Loss Program Seattle

At Allure Esthetic, our weight loss experts go above and beyond to help patients achieve health through sustainable weight loss. The entire process is designed to help patients optimize the effects of Zepbound Seattle and provide the best weight loss experience.

The Consultation

At Allure Esthetic, your Zepbound consultation can be held in person or virtually, depending on what works best for your schedule. This consultation will serve a few purposes, including:

- Going through medical history to ensure you are safely begin treatment

- Going through medical history to ensure you can safely begin treatment
- Going through family medical history to ensure you are not predisposed to complications
- Going over recent and current prescriptions to ensure you can take the medication
- Understanding your unique struggle with weight loss
- Taking your current weight to have the initial starting point
- Discussing your lifestyle and health habits

The expert weight loss providers help all patients find the proper dosage and Zepbound plan to optimize the medication.

Zepbound Injections

Seattle Zepbound injections are self-administered once weekly. However, the providers at Allure Esthetic know this can be nerve-wracking for some patients, so they are here to walk you through the injection steps. If you want, you can come into the office once a week to receive your Zepbound injection, as our providers are on-call 24/7 to help you with your weight loss journey. The Zepbound dosage can be tailored depending on the patient's medication responses and progress.

Monthly-Check Ins

Because our weight loss experts are available anytime, they also provide monthly check-ins to keep up with their weight loss journey. These check-ins can be held in person or virtual to provide added convenience. During these check-ins, the provider will see how you are doing on the medication and where your weight loss journey is headed. They can also provide a Vitamin B supplement to help manage any unpleasant side effects you may experience initially. This will help them tailor the dose to fit the patient's needs.

Nutrition And Exercise Guides

At Allure Esthetic, our providers don't stop prescribing weight loss medication. They provide nutrition and exercise guides to help every patient optimize the results of Zepbound Seattle. Studies have shown that patients who workout and eat healthily lose more weight on tirzepatide medications than those that do not. Our nutrition and diet programs are designed to promote healthier choices that are easy to incorporate into your daily routine.

Frequently Asked Questions

1. Does Zepbound Have Any Risks?

There are potentially fewer risks associated with tirzepatide weight loss medication than semaglutide. However, one should be aware of some side effects and risks, including:

- Nausea
- Indigestion
- Frequent need to use the restroom
- Constipation
- Facial swelling (rare)
- Reaction around the injection site
- Difficulty breathing (rare)
- Allergic reaction (rare)

2. How Long Can I Take Zepbound?

Tirzepaatide Seattle medications for weight loss are designed to be long-term weight loss solutions. You can stay on Zepbound as long as you feel comfortable and the medication is working for you. If you reach your goal weight and want to stop usage, the providers recommend slowly decreasing the amount.

3. Where Should I Inject Zepbound?

Zepbound injections should be rotated weekly between the stomach, thighs, and upper arms. This will help prevent the injection sites from building scar tissue and interfering with medication.

4. How Much Does Zepbound Cost In Seattle?

Zepbound cost depends on the provider you use. At Allure Esthetic, we offer compounded tirzepatide for the same price as tirzepatide, which is $750 monthly. This includes monthly supplies, injections, monthly check-ins, 24/7 access to a weight loss provider, and diet and nutrition guides.

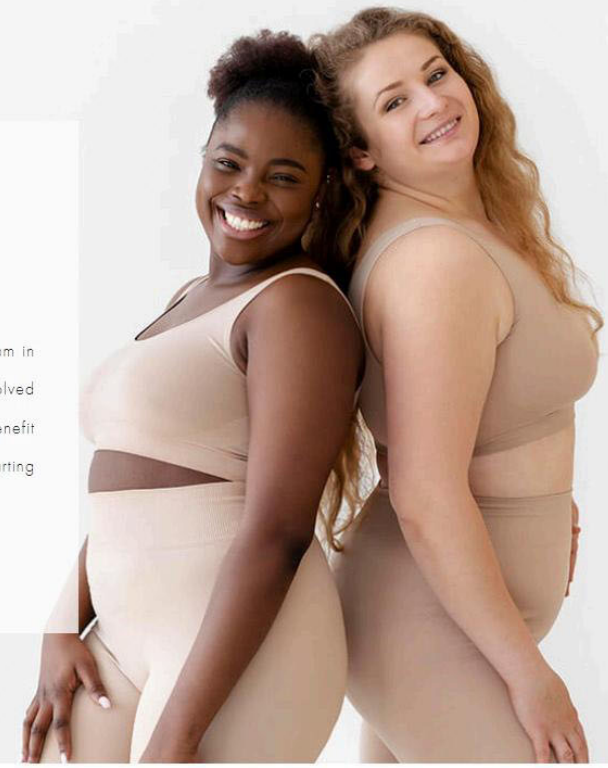
5. How Much Weight Can I Lose On Zepbound?

Studies have shown that patients can lose up to 20% of their body weight when on Seattle tirzepatide medications. However, the amount of weight you can lose depends on your lifestyle and unique body composition.

The Top Zepbound Weight Loss Providers In Seattle

At Allure Esthetic, our weight-loss experts provide the best weight-loss program in Seattleallure. They don't just send you home with a prescription, they stay involved in your weight loss journey. They help you create a healthy lifestyle that will benefit you for years. At Allure Esthetic, it's not just about losing weight. It's about restarting your life and prioritizing your health.

GET STARTED >>



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ALLURE ESTHETIC
PLASTIC SURGERY

Seattle Location:
600 Broadway Suite 320
Seattle, WA 98122

Monday – Friday 8:00 am to 9:00 pm
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Zepbound Bellevue & Kirkland | Tirzepatide Bellevue

at The Gallery of Cosmetic Surgery

Compounded Tirzepatide*

$750/month

(includes medication, all supplies necessary, diet & exercise plan, and the consultation with monthly follow-up appointments)

**Start Same Day as your Consult In Office Injections available*

Weight loss is often a difficult and exhausting endeavor to achieve. While some people can do it through diet and exercise alone, it is not always possible to lose weight with these methods alone. For people with conditions that impact their weight or with limited mobility, diet and exercise may not provide the results necessary. In the last year, the FDA has approved two medications for weight loss. The most recent medication to get approved was Zepbound. The Gallery of Cosmetic Surgery proudly offers the best Zepbound Bellevue and Kirkland residents have available to them.

- ☑ Monthly provider visits
- ☑ 4/7 on call provider
- ☑ Diet Plan that works well with medication
- ☑ Exercise plan that works well with me
- ☑ We provide all supplies and travel friendly caddy.

Supplies we provide include

- ☑ Caddy
- ☑ Syringes
- ☑ Badaids
- ☑ Alcohol pads
- ☑ guaz

FREE IN PERSON & VIRTUAL ZEPBOUND CONSULTATION

START BOOKING

What Is Zepbound?

Zepbound is a brand name for a medication called tirzepatide. Tirzepatide belongs to a class of medications called glucagon-like peptide-1 that mimic select hunger hormones which allow patients to feel full longer, experience fewer cravings, and find themselves feeling fuller sooner during and after meals. However, what makes Zepbound injections different from other GLP-1 medications is that it also target an additional hormone called GIP.

As a dual receptor agonist, it is the only one of its kind. The approach may make Zepbound more effective in certain situations or patients than in others. However, it is best to discuss this with a qualified medical professional before choosing the right injectable medication for weight loss.

Benefits & Risks

Like all medications, Zepbound carries benefits and risks. They may stack up unevenly from patient to patient which is why it is important to evaluate each individual before prescribing Zepbound Bellevue.

The benefits may include:

- Significant weight loss
- Improvement in some medical conditions
- Better mobility and range of motion
- Reduces the severity of setbacks and plateaus
- Can provide patients with a confidence boost
- Few side effects
- Effective
- Low risk
- Little to no pain
- Can help patients achieve a goal weight to get other procedures
- Safe to take long-term
- Easy to administer
- Patients can give themselves injections at home
- Convenient
- Monitored monthly by a medical professional at Seattle Plastic Surgery

Though while it does not pose a major risk for the majority of people, Zepbound can carry higher risks for certain populations. However, overall, the risks associated with tirzepatide injections are relatively low.

The risks could include:

- Infection
- Swelling, redness, or bruising at the injection site
- Scarring
- Severe side effects such as stomach pain or diarrhea
- Allergic reaction
- Pancreatitis
- Low blood sugar
- Severe thyroid problems

Major risks or complications are rare when the medication is used as prescribed. Make sure to provide your entire medical history, including allergies, family history, and current medications. This will allow your provider to fully evaluate your risks and their severity when taking Zepbound Bellevue.

Zepbound vs. Wegovy

Zepbound is similar to Wegovy—also known as Ozempic, which became available earlier this year for weight loss—but it is not the same drug. Instead of semaglutide, which is found in Wegovy, Zepbound uses tirzepatide. This medication is also a GLP-1 agonist and is prescribed for many of the same conditions as semaglutide.

However, Zepbound appears to provide fewer or less severe side effects. It may even be more effective, but this varies from person to person. For people who did not find success with semaglutide or who were bothered by side effects, Zepbound provides a great and likely alternative.

While they are different drugs, semaglutide, and tirzepatide should not be taken together. If you want to switch, discuss the proper way to do so with your provider.

Before & After Bellevue Zepbound Treatment

Consultation

The first step to starting your Zepbound injection journey is to schedule a consultation at The Gallery of Cosmetic Surgery. One of our qualified providers will meet with you—either in person or over Zoom—to discuss the treatment protocol and your candidacy.

First, your provider will want to understand your struggle with weight loss and factors that contribute, like medical conditions, body mass index, previous methods or medications tried, and any medical conditions that may be linked to extra weight. Second, your provider will need to understand your personal and family history.

Finally, since Zepbound is a medication that patients inject at home, this must be possible for that particular patient. Understandably, not all people are comfortable with this, and we do have ways to work with patients with varying preferences and needs.

If deemed a good candidate and prescribed tirzepatide Bellevue, patients will receive their monthly medication and supplies at home.

Injections

At the consultation, your provider will demonstrate how and where to give yourself the injections. Many patients find it much easier than it looks, but we encourage asking questions to ensure your full understanding and comfort.

When patients proceed to inject themselves, they will do so in one of three areas: the stomach, the thigh, or the upper arm. Ideally, patients should rotate the area they inject each week. Zepbound is a once-weekly injection and should be administered on the same day each week.

Diet & Exercise

Our providers highly recommend that patients follow a reduced-calorie diet and exercise regimen. This is completely customizable based on the patient's food allergies and restrictions. Additionally, we do not expect patients to make large changes to their diet or lifestyle immediately. But, consciously making the effort to improve these two areas can help improve the results of Zepbound Bellevue.

In general, our providers tend to recommend:

- Larger focus on strength training versus cardio
- Reduce red meat consumption
- Increase fresh fruit and vegetable intake
- Drink more water
- Listen to your body and reduce foods that interact negatively with it
- Go at your own pace

Going Forward

Moving forward with treatment, patients will meet once weekly with their provider to track their progress and make adjustments if necessary. This can be done in person or virtually. Patients and their providers can also discuss switching medications and the diet and exercise plan.

Frequently Asked Questions

What Is The Dose Of Zepbound For Weight Loss?

Zepbound was trialed and can be prescribed at three different dosage levels: 5 mg, 10 mg, or 15 mg. This gives patients more flexibility in their dosage, and they can increase or decrease it based on their body's response. However, any dose changes will need to be discussed and approved with your provider.

Do You Gain Weight Back After Stopping Mounjaro?

You can. While it is not guaranteed, some people will see a mild weight increase once they stop tirzepatide. However, this can be mitigated by weaning off the medication over several weeks and ensuring that lifestyle changes were made and can be stuck to. It is perfectly normal for your weight to fluctuate moderately throughout your life, but you may consider seeing your provider occasionally to discuss any major weight changes.

Does Insurance Cover Zepbound?

We are currently unaware of no insurance coverage for Zepbound. If this changes and we can accommodate these patients, we will update our patients accordingly.

The makers of Zepbound do have a savings program in place that can help reduce medication costs over time. Regardless of how they are paying for Zepbound, patients are encouraged to enroll in this savings program if they intend to stay on the medication long-term.

Are There Side Effects Of Tirzepatide?

Zepbound Bellevue can cause common side effects, including:

- Upset stomach
- Diarrhea
- Constipation
- Nausea

These side effects tend to be relatively mild and fade once the body gets used to the medication. Rarer or more severe side effects are possible but not common:

- Low blood sugar levels
- Hair loss
- Vomiting
- Injection site infections or reactions

How Much Is Zepbound In Bellevue?

At The Gallery of Cosmetic Surgery, we provide compounded tirzepatide to patients based on a monthly fee of $750. This is the same price as regular tirzepatide and includes the medication, shipping to your home, all necessary supplies, monthly appointments, and the diet and exercise plan.

The Best Zepbound Bellevue & Kirkland Offers

The Gallery of Cosmetic Surgery is a premier cosmetic surgery clinic and medical spa in Lynnwood, WA. Easily accessible from I-405 and I-5, we provide care to patients from all around the state and the world. Our providers work to customize each treatment to the patient and their goals. The medical providers at The Gallery of Cosmetic Surgery offer the best Zepbound injections Bellevue and Kirkland patients can access.

To learn more and schedule your free weight loss consultation, call us at 425-775-3561. Patients can also reach out online via chat, contact form, our online scheduling form, and Price Simulator.

FREE IN PERSON & VIRTUAL ZEPBOUND CONSULTATION

START BOOKING

TINA, PA-C

WEIGHT LOSS SPECIALIST

Tina was born and raised in Fort Worth, Texas, but left her home state to explore the mountains of Washington. Drawn to the aesthetic medicine business, Tina graduated from UT Southwestern Medical Center in Dallas as a certified Physician Assistant. Before she graduated, she knew he wanted to relocate to Seattle and join our company. Her love for helping patients grow and her incredible knowledge brought her to our team!

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Questions? **(425) 775-3561**

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Human Chat

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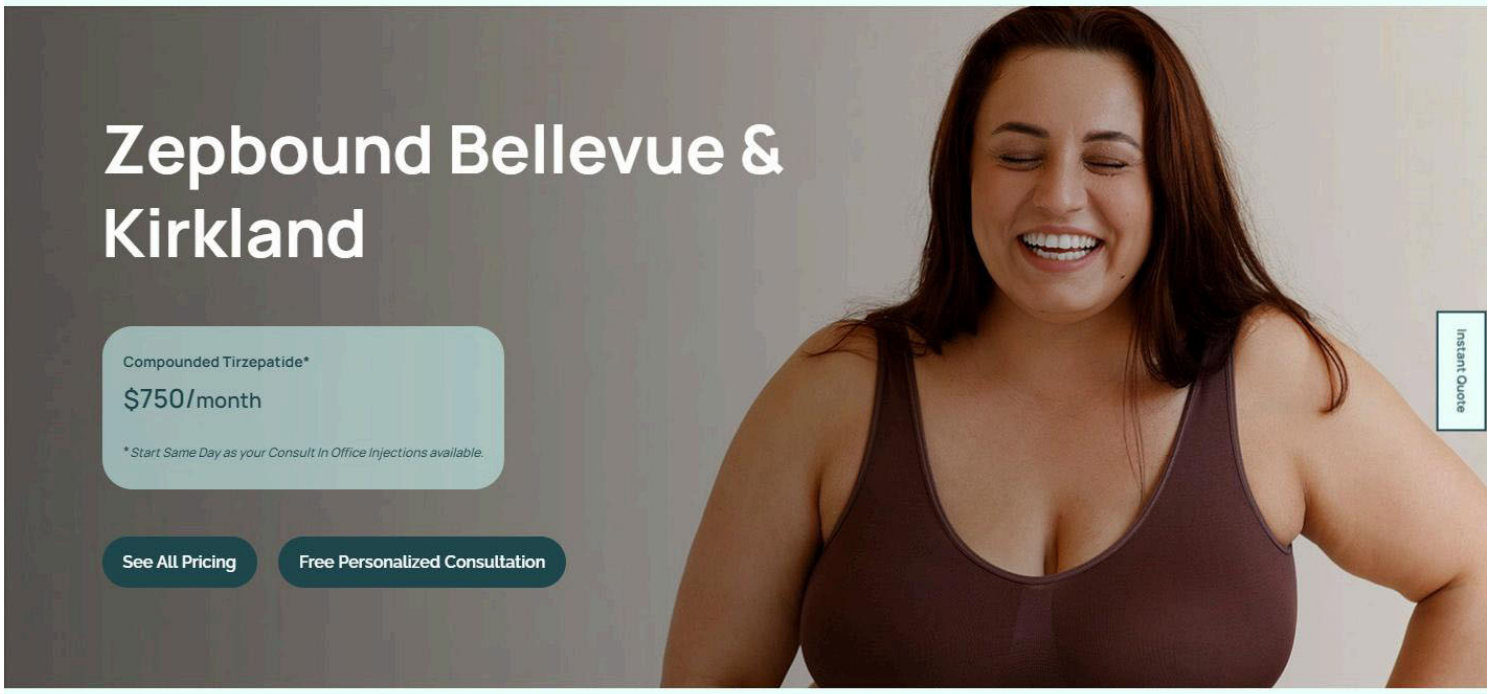


The Premium Benefits With Our Weight Loss Programs

The Supplies We Provide:

- Monthly provider visits
- 24/7 on call provider
- Diet Plan that works well with medication
- Exercise plan that works well with medication
- Caddy
- Syringes
- Bandaids
- Alcohol pads
- Gauze

Zepbound Bellevue & Kirkland

Recent breakthroughs in weight loss research have brought new drugs onto the market to be used specifically for weight loss. The first was **semaglutide**—branded as **Ozempic** or **Wegovy**—and now the Food and Drug Administration (FDA) has approved tirzepatide—known as **Mounjaro** or Zepbound—for weight loss. Northwest Face & Body is proud to offer our Zepbound weight loss program to patients on the Eastside. The providers at Northwest & Body offer the best Zepbound Bellevue and Kirkland patients can find.

Free Personalized Consultation

View Before & Afters

Non-Surgical Weight Loss With Zepbound

Zepbound is a once-weekly injectable medication—also called tirzepatide—now approved for chronic weight management. It is a glucagon-like peptide-1 (GLP-1) agonist, but it is also a glucose-dependent insulinotropic polypeptide (GIP) agonist. This makes it what is referred to as a dual agonist. Instead of activating one hormone receptor, Zepbound Bellevue activates two. Due to this, many people find that tirzepatide injections are more effective and may come with fewer side effects, but this will vary based on the patient.

How It Works

When the medication activates the two hormone receptors—GLP-1 and GIP—it tricks the body into feeling fuller longer and sooner. Tirzepatide injections can also reduce cravings and overall hunger. Zepbound also slows the rate at which the stomach empties. This allows the body to feel full longer. In combination with the traditional approach of diet and exercise, patients can see significant weight loss over several months.

At Northwest Face & Body, our providers prescribe the correct dosage of medication and can give patients advice on their exercise and diet. It does not have to be extreme to see results from tirzepatide treatment in Bellevue.

Benefits

Patients taking Zepbound Bellevue can experience a range of benefits from the medication. Some of the possible benefits of tirzepatide:

- Considerable weight loss
- Reduce hunger
- Lessen the desire to binge eat
- Lower the desire to snack throughout the day
- Can help boost metabolism function
- Make weight loss easier for people with medical conditions that may cause weight gain or make weight loss difficult
- Allows patient to create a healthier lifestyle without hitting discouraging setbacks
- Easily administered injections that the patient can give themselves at home
- Reduced severity and longevity of side-effects
- Medically-focused diet and workout programs
- Safe for effective, long-term use
- May improve mobility for patients whose weight hinders mobility
- As patients see results, it can have a profound positive effect on mental well being and general quality of life
- Help patients qualify for surgeries and procedures they may not have before losing weight
- Consistent, monthly follow-up appointments with a Northwest Face & Body provider to ensure patient's success

Every patient is different and comes to Northwest Face & Body with unique goals and medical history. Thus, our providers customize every aspect of treatment—the medication dosage, diet recommendations, and exercise plan—to fit the patient and their needs so that they may see optimal benefits.

Candidates

Candidates for tirzepatide injection treatment in Bellevue tend to have a body mass index (BMI) classified as "overweight" or "obese." They may or may not have medical conditions associated with higher BMIs, such as high cholesterol, higher blood pressure, or type 2 diabetes. Patients seeking Zepbound should also be fairly healthy. They should not have major heart or bleeding conditions. A personal or family history of certain conditions of the thyroid or

pancreas may need further testing or evaluation to determine candidacy.

Zepbound is a prescription medication. Therefore, Northwest Face & Body providers require that patients first attend a consultation appointment. This can take place in person or virtually. At this appointment, your provider will discuss your weight loss goals, medical history, aspects of your lifestyle, and what you can expect from treatment.

Zepbound Injections

If deemed a good candidate, your provider will demonstrate **how to give yourself the tirzepatide injections**. The needle is tiny, and it is a subcutaneous injection, which means it only has to go beneath the skin. Shallow injections are generally easy to administer and come with minimal pain. Some bleeding, redness, and swelling at the injection site may occur, but this should not be severe and clear up on its own. Your body will likely get used to the injections over time.

Zepbound Bellevue is injected in the stomach, thigh, or upper arm. Patients should rotate the body part each week to avoid skin irritation and injections. The injection mechanism can come as a traditional syringe or as an injection pen. Regardless, the needle is placed just beneath the skin and the medication is delivered into the fatty tissue. This helps it reach blood vessels and the rest of the body quickly.

Following a demonstration and a few times injecting themselves, patients often feel comfortable giving themselves the injections. Patients can also have their spouse or a family member perform the injections for them as well. If a patient is intensely uncomfortable with giving themself the injections, they are welcome to come into the office weekly for one of our medical professionals to perform it.

Zepbound Results

It can take several weeks or months to see visible results (though they may show on the scale before then). In general, it is recommended that patients take Zepbound for a minimum of six months, and the best results typically come in between twelve and sixteen months. Depending on the amount of weight a patient wants or needs to lose, the visible change may occur sooner or take longer.

Patients on all doses of tirezepatide were seen to lose a significant percentage of their weight. If patients follow a consistent diet and exercise routine, they can likely see great results from Zepbound weight loss. Patients will also attend monthly follow-up appointments to monitor weight loss and results.

FAQ

Is Tirpezatide The Same As Ozempic?

No, it is a different medication. They are similar, and both belong to the class of GLP-1 medications. However, Zepbound Bellevue reacts with an additional hormone receptor. They are similar enough that they cannot be taken together. But, many find they experience fewer side effects with tirzepatide injections, but this will vary from patient to patient.

Can You Drink Alcohol While Taking Zepbound?

It is generally recommended that patients avoid drinking alcohol while taking Zepbound. While alcohol can cause weight gain, the primary reason is that it can interact with the medication and cause dangerously low blood sugar. An occasional drink may be okay, but discuss this with your provider if you intend to continue drinking alcohol during the Zepbound weight loss program. Also, know the signs of extremely low blood sugar and what you should do.

Is There A Zepbound Pill?

No, tirzepatide only comes as an injection. Semaglutide does have a pill form, and this can be an option for patients wanting to lose weight, too. The semaglutide pill does come at a higher cost than the injectable forms of

Do Tirzepatide Injections Hurt?

Not really; while some discomfort may occur, the injections are so quick that most patients experience little to no pain. Subcutaneous injections hurt less than other injections, such as those into the muscle or veins. Many barely feel

either semaglutide or tirzepatide.

it.

How Much Does Zepbound Bellevue Cost?

The tirzepatide weight loss program at Northwest Face & Body starts at $750 per month. This cost includes the medication, all necessary supplies, the diet and exercise program, and the monthly appointment. We offer compounded tirzepatide for the same price as tirzepatide.

To our knowledge, medical insurance does not currently cover Zepbound for weight loss. If this changes and Northwest Face & Body can accommodate insurance, we will inform patients. However, they can procure financing for Zepbound. Additionally, there is a savings program hosted by the manufacturer, which we encourage patients to enroll in if they plan to stay on the medication for several months.

The Best Zepbound Weight Loss Program In Bellevue

Northwest Face & Body has served the Eastside of Lake Washington for three decades. Our providers are among the top in their field and take an approach of compassion, understanding, and expertise to craft a patient's ideal Zepbound weight loss program. Northwest Face & Body offers the best Zepbound in **Bellevue** and **Kirkland** can provide.

To learn more and schedule a consultation, call us at **425-576-1700**. Patients can reach out online via chat, contact form, Price Simulator, and online booking.

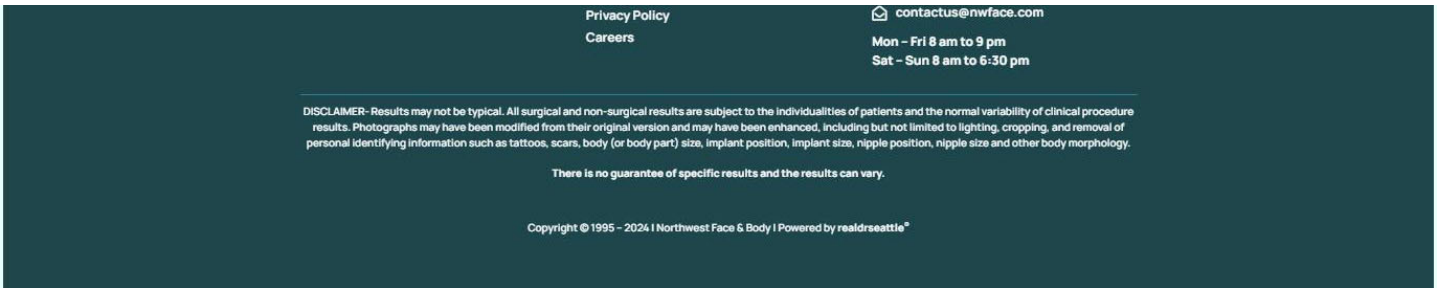
Free Personalized Consultation

Tina, PA-C

Weight Loss Specialist

Tina was born and raised in Fort Worth, Texas, but left her home state to explore the mountains of Washington. Drawn to the aesthetic medicine business, Tina graduated from UT Southwestern Medical Center in Dallas as a certified Physician Assistant. Before she graduated, she knew he wanted to relocate to Seattle and join our company. Her love for helping patients grow and her incredible knowledge brought her to our team!

Learn more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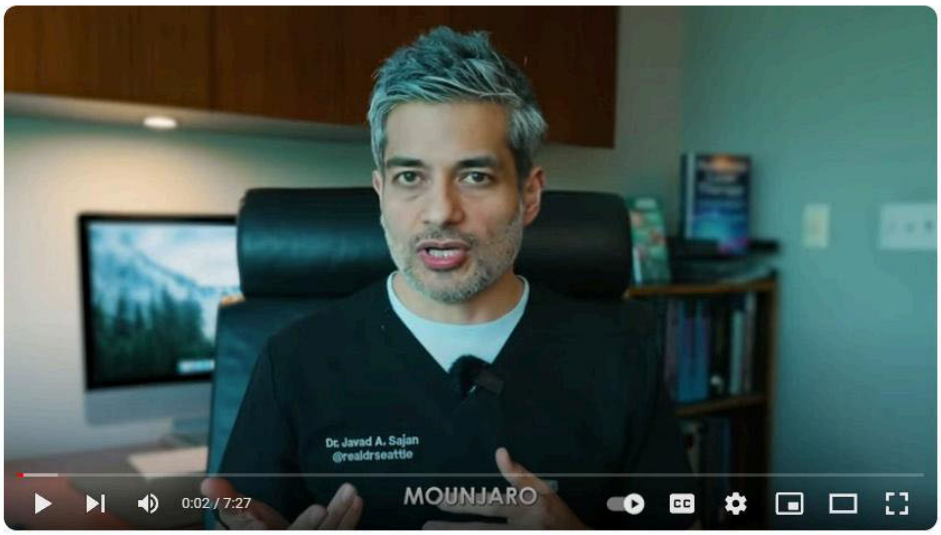

HOW TO INJECT MOUNJARO | MOUNJARO BELLEVUE | TRIZEPITIDE KIRKLAND

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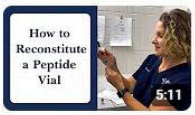

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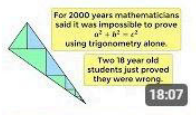

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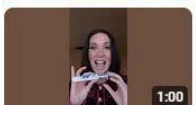

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JS 44 (Rev. 03/24)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. *(SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)*

I. (a) PLAINTIFFS

Eli Lilly and Company

(b) County of Residence of First Listed Plaintiff Marion County, IN
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys *(Firm Name, Address, and Telephone Number)*

Newman LLP; 1201 Second Ave., Suite 900, Seattle, WA 98101; (206) 274-2800

DEFENDANTS

Alderwood Surgical Center LLC d/b/a Allure Esthetic d/b/a Gallery of Cosmetic Surgery d/b/a Seattle Plastic Surgery, et

County of Residence of First Listed Defendant Snohomish County, WA
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys *(If Known)*

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 *(Place an "X" in One Box for Plaintiff and One Box for Defendant)*

(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	☐ 1	☐ 1	Incorporated *or* Principal Place of Business In This State	☐ 4	☐ 4
Citizen of Another State	☐ 2	☐ 2	Incorporated *and* Principal Place of Business In Another State	☐ 5	☐ 5
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6

IV. NATURE OF SUIT *(Place an "X" in One Box Only)*

Click here for: Nature of Suit Code Descriptions.

CONTRACT
- ☐ 110 Insurance
- ☐ 120 Marine
- ☐ 130 Miller Act
- ☐ 140 Negotiable Instrument
- ☐ 150 Recovery of Overpayment & Enforcement of Judgment
- ☐ 151 Medicare Act
- ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans)
- ☐ 153 Recovery of Overpayment of Veteran's Benefits
- ☐ 160 Stockholders' Suits
- ☐ 190 Other Contract
- ☐ 195 Contract Product Liability
- ☐ 196 Franchise

REAL PROPERTY
- ☐ 210 Land Condemnation
- ☐ 220 Foreclosure
- ☐ 230 Rent Lease & Ejectment
- ☐ 240 Torts to Land
- ☐ 245 Tort Product Liability
- ☐ 290 All Other Real Property

TORTS

PERSONAL INJURY
- ☐ 310 Airplane
- ☐ 315 Airplane Product Liability
- ☐ 320 Assault, Libel & Slander
- ☐ 330 Federal Employers' Liability
- ☐ 340 Marine
- ☐ 345 Marine Product Liability
- ☐ 350 Motor Vehicle
- ☐ 355 Motor Vehicle Product Liability
- ☐ 360 Other Personal Injury
- ☐ 362 Personal Injury - Medical Malpractice

PERSONAL INJURY
- ☐ 365 Personal Injury - Product Liability
- ☐ 367 Health Care/ Pharmaceutical Personal Injury Product Liability
- ☐ 368 Asbestos Personal Injury Product Liability

PERSONAL PROPERTY
- ☐ 370 Other Fraud
- ☐ 371 Truth in Lending
- ☐ 380 Other Personal Property Damage
- ☐ 385 Property Damage Product Liability

CIVIL RIGHTS
- ☐ 440 Other Civil Rights
- ☐ 441 Voting
- ☐ 442 Employment
- ☐ 443 Housing/ Accommodations
- ☐ 445 Amer. w/Disabilities - Employment
- ☐ 446 Amer. w/Disabilities - Other
- ☐ 448 Education

PRISONER PETITIONS

Habeas Corpus:
- ☐ 463 Alien Detainee
- ☐ 510 Motions to Vacate Sentence
- ☐ 530 General
- ☐ 535 Death Penalty

Other:
- ☐ 540 Mandamus & Other
- ☐ 550 Civil Rights
- ☐ 555 Prison Condition
- ☐ 560 Civil Detainee - Conditions of Confinement

FORFEITURE/PENALTY
- ☐ 625 Drug Related Seizure of Property 21 USC 881
- ☐ 690 Other

LABOR
- ☐ 710 Fair Labor Standards Act
- ☐ 720 Labor/Management Relations
- ☐ 740 Railway Labor Act
- ☐ 751 Family and Medical Leave Act
- ☐ 790 Other Labor Litigation
- ☐ 791 Employee Retirement Income Security Act

IMMIGRATION
- ☐ 462 Naturalization Application
- ☐ 465 Other Immigration Actions

BANKRUPTCY
- ☐ 422 Appeal 28 USC 158
- ☐ 423 Withdrawal 28 USC 157

INTELLECTUAL PROPERTY RIGHTS
- ☐ 820 Copyrights
- ☐ 830 Patent
- ☐ 835 Patent - Abbreviated New Drug Application
- ☒ 840 Trademark
- ☐ 880 Defend Trade Secrets Act of 2016

SOCIAL SECURITY
- ☐ 861 HIA (1395ff)
- ☐ 862 Black Lung (923)
- ☐ 863 DIWC/DIWW (405(g))
- ☐ 864 SSID Title XVI
- ☐ 865 RSI (405(g))

FEDERAL TAX SUITS
- ☐ 870 Taxes (U.S. Plaintiff or Defendant)
- ☐ 871 IRS—Third Party 26 USC 7609

OTHER STATUTES
- ☐ 375 False Claims Act
- ☐ 376 Qui Tam (31 USC 3729(a))
- ☐ 400 State Reapportionment
- ☐ 410 Antitrust
- ☐ 430 Banks and Banking
- ☐ 450 Commerce
- ☐ 460 Deportation
- ☐ 470 Racketeer Influenced and Corrupt Organizations
- ☐ 480 Consumer Credit (15 USC 1681 or 1692)
- ☐ 485 Telephone Consumer Protection Act
- ☐ 490 Cable/Sat TV
- ☐ 850 Securities/Commodities/ Exchange
- ☐ 890 Other Statutory Actions
- ☐ 891 Agricultural Acts
- ☐ 893 Environmental Matters
- ☐ 895 Freedom of Information Act
- ☐ 896 Arbitration
- ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
- ☐ 950 Constitutionality of State Statutes

V. 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

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing ***(Do not cite jurisdictional statutes unless diversity)***:
15 U.S.C. §§ 1114,1125

Brief description of cause:
Trademark infringement, false designation of origin, and false advertising

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A **CLASS ACTION** UNDER RULE 23, F.R.Cv.P.

DEMAND $ Unspecified; Injunction

CHECK YES only if demanded in complaint:
JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE _____ DOCKET NUMBER _____

DATE
June 20, 2024

SIGNATURE OF ATTORNEY OF RECORD
Jason Sykes, Esq.

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

I.(a) **Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) **County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) **Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

II. **Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below**; NOTE: federal question actions take precedence over diversity cases.**)

III. **Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

IV. **Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: Nature of Suit Code Descriptions.

V. **Origin.** Place an "X" in one of the seven boxes.
Original Proceedings. (1) Cases which originate in the United States district courts.
Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.

VI. **Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.

VII. **Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

VIII. **Related Cases.** This section of the JS 44 is used to reference related cases, if any. If there are related cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

AO 120 (Rev. 08/10)

TO:	Mail Stop 8 Director of the U.S. Patent and Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450	REPORT ON THE FILING OR DETERMINATION OF AN ACTION REGARDING A PATENT OR TRADEMARK

In Compliance with 35 U.S.C. § 290 and/or 15 U.S.C. § 1116 you are hereby advised that a court action has been filed in the U.S. District Court Western District of Washington on the following

☑ Trademarks or ☐ Patents. (☐ the patent action involves 35 U.S.C. § 292.):

DOCKET NO.	DATE FILED	U.S. DISTRICT COURT
2:24-cv-00878	6/20/2024	Western District of Washington

PLAINTIFF	DEFENDANT
ELI LILLY AND COMPANY	Alderwood Surgical Center LLC d/b/a Allure Esthetic d/b/a Gallery of Cosmetic Surgery d/b/a Seattle Plastic Surgery, et al.

	PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK
1	6,809,369	8/2/2022	Eli Lilly and Company
2	7,068,463	5/30/2023	Eli Lilly and Company
3	7,288,373	1/23/2024	Eli Lilly and Company
4			
5			

In the above—entitled case, the following patent(s)/ trademark(s) have been included:

DATE INCLUDED	INCLUDED BY ☐ Amendment ☐ Answer ☐ Cross Bill ☐ Other Pleading	
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK
1		
2		
3		
4		
5		

In the above—entitled case, the following decision has been rendered or judgement issued:

DECISION/JUDGEMENT

CLERK	(BY) DEPUTY CLERK	DATE

Copy 1—Upon initiation of action, mail this copy to Director **Copy 3—Upon termination of action, mail this copy to Director**
Copy 2—Upon filing document adding patent(s), mail this copy to Director **Copy 4—Case file copy**

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Western District of Washington

ELI LILLY AND COMPANY

Plaintiff(s)

v.

ALDERWOOD SURGICAL CENTER LLC D/B/A ALLURE ESTHETIC, D/B/A GALLERY OF COSMETIC SURGERY, D/B/A SEATTLE PLASTIC SURGERY, ET AL.

Defendant(s)

Civil Action No. 2:24-cv-00878

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* ALDERWOOD SURGICAL CENTER LLC
c/o MPBA SERVICE COMPANY LLC
701 5TH AVE, SUITE 5500
SEATTLE, WA 98104

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

JASON SYKES, ESQ.
NEWMAN LLP
1201 SECOND AVENUE, SUITE 900
SEATTLE, WA 98101

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Western District of Washington

ELI LILLY AND COMPANY

Plaintiff(s)

v.

ALDERWOOD SURGICAL CENTER LLC D/B/A ALLURE ESTHETIC, D/B/A GALLERY OF COSMETIC SURGERY, D/B/A SEATTLE PLASTIC SURGERY, ET AL.

Defendant(s)

Civil Action No. 2:24-cv-00878

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* NORTHWEST NASAL SINUS CENTER P.S.
c/o MPBA SERVICE COMPANY LLC
701 5TH AVE, SUITE 5500
SEATTLE, WA 98104

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

JASON SYKES, ESQ.
NEWMAN LLP
1201 SECOND AVENUE, SUITE 900
SEATTLE, WA 98101

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Western District of Washington

ELI LILLY AND COMPANY

Plaintiff(s)

v.

ALDERWOOD SURGICAL CENTER LLC D/B/A ALLURE ESTHETIC, D/B/A GALLERY OF COSMETIC SURGERY, D/B/A SEATTLE PLASTIC SURGERY, ET AL.

Defendant(s)

Civil Action No. 2:24-cv-00878

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* JAVAD A. SAJAN, M.D.
SEATTLE PLASTIC SURGERY
600 BROADWAY, SUITE 320
SEATTLE, WA 98122

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

JASON SYKES, ESQ.
NEWMAN LLP
1201 SECOND AVENUE, SUITE 900
SEATTLE, WA 98101

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Western District of Washington

ELI LILLY AND COMPANY

Plaintiff(s)

v.

ALDERWOOD SURGICAL CENTER LLC D/B/A ALLURE ESTHETIC, D/B/A GALLERY OF COSMETIC SURGERY, D/B/A SEATTLE PLASTIC SURGERY, ET AL.

Defendant(s)

Civil Action No. 2:24-cv-00878

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* CRAIG R. JONOV, M.D.
SEATTLE PLASTIC SURGERY
600 BROADWAY, SUITE 320
SEATTLE, WA 98122

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

JASON SYKES, ESQ.
NEWMAN LLP
1201 SECOND AVENUE, SUITE 900
SEATTLE, WA 98101

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____ was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc: