

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

FLEISCHER STUDIOS, INC.,

PLAINTIFF,

v.

THE PARTNERSHIPS AND UNINCORPORATED  
ASSOCIATIONS IDENTIFIED ON SCHEDULE A,

DEFENDANTS.

CASE NO.: 1:21-cv-03919

**FILED UNDER SEAL**

**AMENDED COMPLAINT**

Plaintiff, Fleischer Studios, Inc. (“Fleischer Studios” or “Plaintiff”), by its undersigned counsel, hereby complains of the Partnerships and Unincorporated Associations identified on Schedule A, attached hereto (collectively, “Defendants”), and for its Complaint hereby alleges as follows:

**JURISDICTION AND VENUE**

1. This Court has original subject matter jurisdiction over the claims in this action pursuant to the provisions of the Lanham Act, 15 U.S.C. § 1051 *et seq.*, the Federal Copyright Act, 17 U.S.C. § 101, *et seq.*, 28 U.S.C. § 1338(a)–(b), and 28 U.S.C. § 1331. This Court has jurisdiction over the claims in this action that arise under the laws of the State of Illinois pursuant to 28 U.S.C. § 1367(a), because the state law claims are so related to the federal claims that they form part of the same case or controversy and derive from a common nucleus of operative facts.

2. This Court has personal jurisdiction over each Defendant, in that each Defendant conducts significant business in Illinois and in this Judicial District, and the acts and events giving



rise to this lawsuit, of which each Defendant stands accused, were undertaken in Illinois and within this Judicial District.


3. Venue is proper in this Court pursuant to 28 U.S.C. § 1391, since each Defendant directly targets consumers in the United States, including Illinois, through the fully interactive, commercial Internet stores operating under the online marketplace accounts identified in Schedule A. Each of the Defendants has targeted sales from Illinois residents by operating online stores that offer shipping to the United States, including Illinois, accept payment in U.S. dollars and, on information and belief, has sold, and continues to sell counterfeit products that infringe Plaintiff's trademarks and/or copyrights. Each Defendant is committing tortious acts, is engaging in interstate commerce, and has wrongfully caused substantial injury in the State of Illinois.

### **INTRODUCTION**


4. This action has been filed to combat the online trademark and copyright infringement and counterfeiting of Defendants, who trade upon Plaintiff's valuable trademarks and copyrights by selling and/or offering for sale unauthorized, unauthentic, and counterfeit products in connection with Plaintiff's federally registered trademarks, as well as to stop and prevent Defendants' selling of unauthorized products that use, are based on, and/or are derived from copyrighted subject matter created by Fleischer Studios.

5. Plaintiff, Fleischer Studios, Inc., is the owner of the federally registered Betty Boop Trademarks, United States Trademark Registration Nos. 2,361,245; 2,392,715; 2,374,258; 2,376,545; 2,349,360; 2,378,474; and 2,430,642 (collectively referred to as the "Betty Boop Trademarks"). The Registrations are valid, subsisting, and in full force and effect. True and correct copies of the Registrations are attached hereto as Exhibit 1, and described in the table below.

TRADEMARK REGISTRATIONS			
REG. NO.	WORD/DESIGN MARK	CLASS(ES)	REG. DATE
2,349,360		FOR: TRADING CARDS, PAPER GIFT BAGS, CARDBOARD MAILERS, BOOKS FOCUSING ON COMIC STRIP REPRINTS, CALENDARS, STICKERS, POSTCARDS, GREETING CARDS, CARDBOARD GIFT BOXES, ADDRESS AND TELEPHONE BOOKS, PENS AND STATIONERY SETS CONSISTING OF PENCILS, DRAWING AND UNGRADUATED RULERS, ERASERS, ADHESIVE TAPE DISPENSER FOR HOUSEHOLD OR STATIONERY USE, PENCIL CASE, STENCILS, PLASTIC PAPER CLIP, DECORATIVE PENCIL TOP ORNAMENTS, AND PAPER, IN CLASS 16.	May 16, 2000
2,361,245		<p>FOR: AIR FRESHENERS, IN CLASS 5.</p> <p>FOR: TOILET SEATS, IN CLASS 11.</p> <p>FOR: JEWELRY OF NON PRECIOUS METALS, CLOCKS, WATCHES, IN CLASS 14.</p> <p>FOR: WALLETs MADE OF LEATHER, UMBRELLAS, TOTE BAGS, BACK PACKS AND PURSES, IN CLASS 18.</p> <p>FOR: HANDHELD MIRRORS, SNOW GLOBES, PICTURE FRAMES, PILL BOXES SOLD EMPTY, IN CLASS 20.</p> <p>FOR: FIGURINES MADE OF PORCELAIN, DRINKING GLASSES, PLASTIC WATER BOTTLES, LUNCH BOXES, COOKIE JARS, SPOON RESTS, KITCHEN TOOL HOLDERS, COMPACTS SOLD EMPTY, TEA SETS, AND PLATES, IN CLASS 21.</p> <p>FOR: POT HOLDERS, TOWELS, WASH CLOTHS, AND DISH TOWELS, IN CLASS 24.</p> <p>FOR: SUN VISORS, SHIRTS, SHORTS, SWEATSHIRTS, TOPS, PAJAMES, SLEEP SHIRTS, SNEAKERS, JEANS, JEAN JACKETS, JEAN VESTS, JEAN SHIRTS, JEAN SHORTS, CAMISOLES, ROBES, LEATHER BELTS, COSTUMES AND MASKS SOLD IN CONNECTION THEREWITH AND TIES, IN CLASS 25.</p> <p>FOR: SOFT SQUEEZABLE TOY BALLS, BEACH BALLS, PLASTIC VINYL PLAY BALLS, SOFT FLYING DISKS, SQUEEZE TOYS, CHRISTMAS ORNAMENTS, BUBBLE MAKING WAND AND SOLUTION SET, DOLLS AND MAGNETIC DOLLS WITH FLAT MAGNETIC ARTICLES OF CLOTHING AND ACCESSORIES, IN CLASS 28.</p>	Jun. 27, 2000

2,374,258	<b>BETTY BOOP</b>	FOR: MAGNETS, CASES SPECIALLY ADAPTED FOR HOLDING PAGERS, ELECTRIC SWITCH PLATES, IN CLASS 9.	Aug. 28, 2000
2,376,545		FOR: MAGNETS, COMPUTER PROGRAMS FOR CREATING ANIMATED CARTOONS AND ASSISTING IN THE COMPUTERIZED GRAPHIC DESIGN OF CARTOON CHARACTERS, SCREEN SAVERS IN THE FIELD OF CARTOON CHARACTERS, CASES SPECIALLY ADAPTED FOR HOLDING PAGERS, ELECTRONIC SWITCH PLATES, IN CLASS 9.	Aug. 15, 2000
2,378,474	<b>BETTY BOOP</b>	FOR: TRADING CARDS, PAPER GIFT BAGS, CARDBOARD MAILERS, BOOKS FOCUSING ON COMIC STRIP REPRINTS, CALENDARS, STICKERS, POSTCARDS, GREETING CARDS, CARDBOARD GIFT BOXES, ADDRESS AND TELEPHONE BOOKS, PENS AND STATIONERY SETS CONSISTING OF PENCILS, DRAWING OR UNGRADUATED RULERS, ERASERS, ADHESIVE TAPE DISPENSER FOR HOUSEHOLD OR STATIONERY USE, PENCIL CASES, STENCILS, PLASTIC PAPER CLIPS, DECORATIVE PENCIL TOP ORNAMENTS AND PAPER, IN CLASS 16.	Aug. 22, 2000
2,392,715	<b>BETTY BOOP</b>	FOR: COMPUTERIZED ON-LINE ORDERING SERVICES IN THE FIELD OF COMPUTER GENERATED ELECTRONIC GREETING CARDS DISTRIBUTED OVER A GLOBAL COMPUTER NETWORK, IN CLASS 35.	Oct. 10, 2000

2,430,642	<b>BETTY BOOP</b>	<p>FOR: BUBBLE BATH, BODY WASH, AFTER BATH SPLASH, IN CLASS 3.</p> <p>FOR: AIR FRESHENERS, IN CLASS 5.</p> <p>FOR: KEY CHAINS MADE OF METAL, IN CLASS 6.</p> <p>FOR: HANDHELD HAIR DRYERS, TOILET SEATS, IN CLASS 11.</p> <p>FOR: JEWELRY OF NON-PRECIOUS METALS, CLOCKS, WATCHES, IN CLASS 14.</p> <p>FOR: WALLETs MADE OF LEATHER, UMBRELLAS, TOTE BAGS, BACK PACKS AND PURSES, IN CLASS 18.</p> <p>FOR: HANDHELD MIRRORS, SNOW GLOBES, PICTURE FRAMES, PILL BOXES SOLD EMPTY, IN CLASS 20.</p> <p>FOR: FIGURINES MADE OF PORCELAIN, DRINKING GLASSES, PLASTIC WATER BOTTLES, LUNCH BOXES, COOKIE JARS, SPOON RESTS, KITCHEN TOOL HOLDERS, COMPACTS SOLD EMPTY, TEA SETS, AND PLATES, IN CLASS 21.</p> <p>FOR: FABRIC, NAMELY, COTTON, POLYESTER, COTTON/POLYESTER BLEND, RAMIE, WOOL, DENIM, FLEECE, RAYON, NYLON; POTHOLDERS, TOWELS, WASH CLOTHS AND DISH TOWELS, IN CLASS 24.</p> <p>FOR: SUN VISORS, SHIRTS, SHORTS, SWEATSHIRTS, TOPS, PAJAMAS, SLEEP SHIRTS, SNEAKERS, JEANS, JEAN JACKETS, JEAN VESTS, JEAN SHIRTS, JEAN SHORTS, CAMISOLES, ROBES, LEATHER BELTS, COSTUMES AND MASKS SOLD IN CONNECTION THEREWITH AND TIES, IN CLASS 25.</p> <p>FOR: ORNAMENTAL BUTTON COVERS AND ORNAMENTAL NOVELTY PINS, IN CLASS 26.</p> <p>FOR: SOFT SQUEEZABLE BALLS, BEACH BALLS, PLASTIC VINYL PLAY BALLS, SOFT FLYING DISKS, SQUEEZE TOYS, CHRISTMAS ORNAMENTS, BUBBLE MAKING WAND AND SOLUTION SET, DOLLS AND MAGNETIC DOLL SETS CONSISTING OF FLAT MAGNETIC DOLLS WITH FLAT MAGNETIC ARTICLES OF CLOTHING AND ACCESSORIES, IN CLASS 28.</p> <p>FOR: AMUSEMENT PARK SERVICES, IN CLASS 41.</p>	Feb. 27, 2001
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6,193,127	<b>BETTY BOOP</b>	CLASS 41: ENTERTAINMENT SERVICES, NAMELY, PROVIDING ENTERTAINMENT INFORMATION VIA WEBSITES AND SOCIAL MEDIA WEBSITES.	Nov. 10, 2020
6,193,140		CLASS 41: ENTERTAINMENT SERVICES, NAMELY, PROVIDING ENTERTAINMENT INFORMATION VIA WEBSITES AND SOCIAL MEDIA WEBSITES.	Nov. 10, 2020

6. Plaintiff is the owner of numerous Copyright Registrations, which have effective registration dates as early as 1981, and are attached hereto as Exhibit 2 (hereinafter referred to as “Betty Boop Copyrights”).

7. In an effort to illegally and deceptively profit from the Betty Boop Trademarks and Betty Boop Copyrights, Defendants created numerous online marketplace accounts and online stores (referred to as “Defendant Internet Stores” or “Seller Aliases”), intentionally designed in look, feeling, and suggestion to give the impression to consumers that they are legitimate websites selling products manufactured by or authorized by Fleischer Studios (the “Betty Boop Products”), with Defendants’ ultimate intention being to deceive unknowing consumers into purchasing unauthorized and infringing Betty Boop Products (hereinafter referred to as “Counterfeit Betty Boop Products” or “Counterfeit Products”).

8. Defendant Internet Stores share numerous unique identifiers, such as design elements and similarities of the unauthorized products offered for sale, establishing a logical relationship between Defendants, and suggesting that Defendants’ illegal operations arise out of the same transaction, occurrence, or series of transactions or occurrences. Defendants attempt to avoid liability by going to great lengths to conceal both their identities and the full scope and interworking of their illegal operation.

9. Plaintiff is forced to file this action to combat Defendants' ongoing infringement of Plaintiff's Betty Boop Trademarks and Betty Boop Copyrights (collectively referred to as "Fleischer Studios Intellectual Property" or "Fleischer Studios IP"). Plaintiff has been and continues to be irreparably damaged through consumer confusion, dilution, loss of control over the creative content, and tarnishment of its valuable trademarks and copyrights as a result of Defendants' actions and is thus seeking injunctive and monetary relief.

### **THE PLAINTIFF**

10. Founded in 1921, and based in Los Angeles, Fleischer Studios, Inc. is an American animation studio, founded by brothers Max and Dave Fleischer.

11. Fleischer Studios was a pioneer in the art and craft of animation, responsible for creating and animating some of the most beloved characters in American animation,

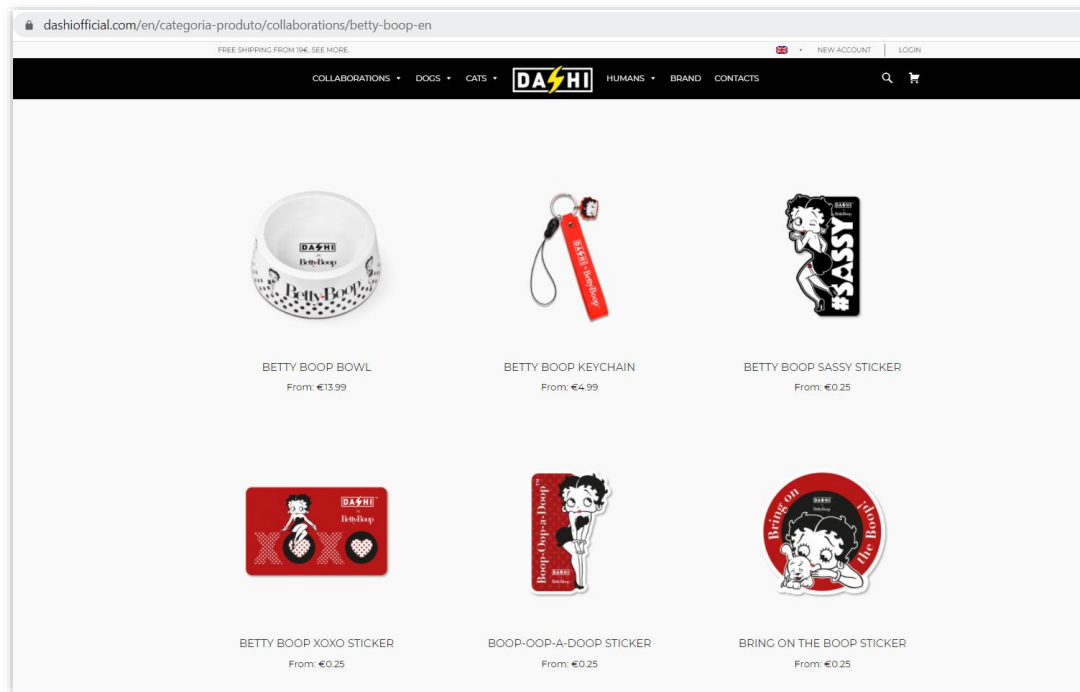
12. Known for their ground-breaking marriage of live action with animation, their ingenious "bouncing ball" cartoons, their gritty, urban and often surreal landscapes, their jazz cartoons featuring early film footage of the era's popular artists.

13. Today, Max's grandson, Mark Fleischer, serves as Chairman and CEO of Fleischer Studios. An entertainment executive and attorney, Mark has been responsible for overseeing the ushering of Betty Boop and all the Fleischer characters into the 21st century.

14. A caricature of a Jazz Age flapper, Betty Boop is an animated cartoon character who was featured in 90 theatrical cartoons between 1930 and 1939. She has also been featured in comic strips and mass merchandising.

15. Fleischer Studios exclusively manufactures various retail products and merchandise. These products are derived from the successful Betty Boop brand. A variety of licensed Betty Boop products are available, such as clothing, posters, figurines, dolls, keychains,

stickers, and other accessories. Authentic Betty Boop products are available for purchase at authorized licensee websites such as [www.dashiofficial.com/en/](http://www.dashiofficial.com/en/).



16. Fleischer Studios, Inc. is in the business of developing, marketing, and licensing Betty Boop Products.

17. Fleischer Studios, Inc. is the licensor of all Betty Boop Products available in stores and on various e-commerce platforms.

18. Fleischer Studios has used the Betty Boop and other trademarks for many years and has continuously sold products under the Betty Boop and other trademarks (collectively, the “Betty Boop Trademarks”). As a result of this long-standing use, strong common law trademark rights have amassed in the Betty Boop Trademarks. Fleischer Studios’s use of the marks has also built substantial goodwill in and to the Betty Boop Trademarks. The Betty Boop Trademarks are famous marks and valuable assets of Fleischer Studios. Betty Boop Products typically include at least one of the registered Betty Boop Trademarks and/or the Betty Boop Copyrighted Designs.



19. The Betty Boop Trademarks have been used exclusively by Fleischer Studios, and have never been abandoned. The Trademark Registrations are valid, subsisting, and in full force and effect. The registrations of the Betty Boop Trademarks constitute prima facie evidence of their validity and of Fleischer Studios's exclusive right to use the Betty Boop Trademarks pursuant to 15 U.S.C. § 1057(b).

20. Fleischer Studios has invested substantial time, money, and effort in building up and developing consumer recognition, awareness, and goodwill in the Betty Boop Products.

21. The success of the Betty Boop Products is due in large part to the marketing, promotional, and distribution efforts of Fleischer Studios. These efforts include advertising and promotion through online retailer websites, and are conducted through internet-based advertising, print, and other efforts both in the United States and internationally.

22. The success of the Betty Boop Brand is also due to the use of high-quality materials and processes in making the Betty Boop Products.

23. Additionally, Fleischer Studios owes a substantial amount of the success of the Betty Boop Products to its licensees, consumers, and interest that its consumers have generated.

24. As a result of the efforts of Fleischer Studios, the quality of its Betty Boop Products, the promotional efforts for its products and designs, press and media coverage, and widespread marketing, members of the public have become familiar with the Betty Boop Products, Betty Boop Copyrights, and Betty Boop Trademarks, and associate them exclusively with Fleischer Studios.

25. Fleischer Studios, Inc. has made efforts to protect its interests in and to the Betty Boop Intellectual Property. Fleischer Studios, Inc. and its licensees are the only businesses and/or individuals authorized to manufacture, import, export, advertise, offer for sale, or sell any goods utilizing the Betty Boop Copyrights and/or Betty Boop Trademarks, without the express written

permission of Fleischer Studios, Inc.. Plaintiff has not licensed or authorized Defendants to use the Betty Boop Trademarks and Copyrights.

### **THE DEFENDANTS**

26. Defendants are individuals and business entities who, upon information and belief, reside in the People's Republic of China or other foreign jurisdictions. Defendants conduct business throughout the United States, including Illinois, and within this Judicial District, through the operation of fully interactive commercial websites and online marketplace accounts operating under the Defendant Internet Stores. Each Defendant targets the United States, including Illinois, and has offered to sell and, on information and belief, has sold and continues to sell Counterfeit Betty Boop Products to consumers within the United States, Illinois, and this Judicial District.

### **THE DEFENDANTS' UNLAWFUL CONDUCT**

27. The success and widespread popularity and recognition of the Betty Boop brand and Betty Boop Products has resulted in significant counterfeiting and intentional copying. Plaintiff has identified numerous domain names linked to fully interactive websites and marketplace listings on platforms such as eBay, Amazon, Wish, Etsy, and AliExpress, including the Defendant Internet Stores, which are offering for sale, selling, and importing Counterfeit Betty Boop Products to consumers in this Judicial District and throughout the United States. Internet websites like the Defendant Internet Stores are estimated to receive tens of millions of visits per year and to generate over \$135 billion in annual online sales. According to an intellectual property rights seizures statistics report issued by Homeland Security, the manufacturer's suggested retail price (MSRP) of goods seized by the U.S. government in the fiscal year 2013 was over \$1.74 billion, up from \$1.26 billion in 2012. Internet websites like the Defendant Internet Stores are also estimated to contribute

to tens of thousands of lost jobs for legitimate businesses and broader economic damages such as lost tax revenue every year.

28. As recently addressed in the Wall Street Journal, Fortune, and the New York Times, and as reflected in the federal lawsuits filed against sellers offering for sale and selling infringing and/or counterfeit products on the above mentioned digital marketplaces, an astronomical number of counterfeit and infringing products are offered for sale and sold on these digital marketplaces at a rampant rate. See Kathy Chu, *Luxury brands get tougher with counterfeiters – and Alibaba*, MARKETWATCH (Aug. 16, 2016), <http://www.marketwatch.com/story/luxury-brands-get-tough-with-counterfeiters-2016-08-16-91031611>; Gilian Wong, *Alibaba Sued Over Alleged Counterfeits*, WALL STREET JOURNAL (May 17, 2015), <http://www.wsj.com/articles/alibaba-sued-over-alleged-counterfeits-1431877734>; Scott Cendrowski, *There's no end in sight for Alibaba's counterfeit problem*, FORTUNE (May 18, 2015), <http://fortune.com/2015/05/18/theres-no-end-in-sight-for-alibabas-counterfeit-problem/>.

29. Upon information and belief, Defendants facilitate sales by designing their Internet stores and product listings to appear to unknowing consumers as authorized online retailers, outlet stores, or wholesalers selling genuine Betty Boop Products, through the use of Fleischer Studios Intellectual Property. Defendant Internet Stores look sophisticated and perpetuate an illusion of legitimacy – they accept payment in U.S. dollars via credit cards, Western Union, and PayPal; they often include images and design elements that make it difficult for consumers to distinguish these unauthorized sites from an authorized website; they offer “live 24/7” customer service; and, they use indicia of authenticity and security that consumers have come to associate with authorized retailers, including the McAfee® Security, VeriSign®, Visa®, MasterCard®, and PayPal® logos.

30. Upon information and belief, Defendants also deceive unknowing consumers by using the Betty Boop Trademarks without authorization within the content, text, and/or meta tags of their websites, in order to attract and manipulate search engines into identifying the Defendant Internet Stores as legitimate websites for Betty Boop Products. Defendants also employ other unauthorized search engine optimization (“SEO”) tactics and social media spamming so that the Defendant Internet Stores show up at or near the top of relevant search results, including tactics to propel new domain names to the top of search results after others are shut down. These tactics are meant to, and are successful in, misdirecting consumers who are searching for genuine Betty Boop Products.

31. Upon information and belief, Defendants operate in a collective and organized manner, often monitor trademark infringement litigation alert websites, are in continuous and active concert with one another, are in frequent communication with each other – utilizing online chat platforms and groups, and use these collective efforts in an attempt to avoid liability and intellectual property enforcement efforts. Furthermore, there is a substantial evidentiary overlap in Defendants’ behavior, conduct, and individual acts of infringement, thus constituting a collective enterprise.

32. Defendants go to great lengths to conceal their identities and often use multiple fictitious names and addresses to register and operate their massive network of Defendant Internet Stores. For example, many of Defendants’ names and physical addresses used to register the Defendant Internet Stores are incomplete, contain randomly typed letters, or fail to include cities or states. Other Defendants use privacy services that conceal the owners’ identity and contact information. Upon information and belief, Defendants regularly create new websites and online marketplace accounts on various platforms using the identities listed in Schedule A of the Complaint,

as well as other unknown fictitious names and addresses. Such Defendant Internet Store registration patterns are one of many common tactics used by Defendants to conceal their identities, the full scope and interworking of their massive infringing operation, and to avoid being shut down.

33. Even though Defendants operate under multiple fictitious names, there are numerous similarities among the Defendant Internet Stores, including, but by no means limited to: (1) virtually identical layouts, even though different aliases were used to register the respective online marketplace accounts; (2) similarities of the Counterfeit Betty Boop Products, and indicia of being related to one another, suggesting that the illegal products were manufactured by and come from a common source and that, upon information and belief, Defendants are interrelated; and, (3) other notable common features such as use of the same registration patterns, unique shopping cart platforms, accepted payment methods, check-out methods, meta data, illegitimate SEO tactics, HTML user-defined variables, domain redirection, lack of contact information, identically or similarly priced items and volume sales discounts, similar hosting services, similar name servers, and the use of the same text and images.

34. Further, illegal operators, like Defendants, typically operate multiple credit card merchant accounts and third-party payment processor accounts, such as PayPal accounts, behind layers of payment gateways so they can continue operation in spite of any enforcement efforts. Upon information and belief, and as PayPal transaction logs in previous similar cases have shown, Defendants maintain off-shore bank accounts and regularly move funds from their PayPal accounts to off-shore bank accounts outside the jurisdiction of this Court.

35. Defendants, without any authorization or license, have knowingly and willfully infringed the Betty Boop Trademarks and Copyrights in connection with the advertisement, distribution, offering for sale, and sale of illegal, infringing, and counterfeit products into the

United States and Illinois. Each Defendant Internet Store offers to ship to the United States, including Illinois, and, on information and belief, each Defendant has offered to sell, or has already sold, infringing products therein.

36. In committing these acts, Defendants have, among other things, willfully and in bad faith, committed the following, all of which have and will continue to cause irreparable harm to the Betty Boop brand: infringed upon and counterfeited the Betty Boop Trademarks and Betty Boop Copyrights; created, manufactured, sold, and/or offered to sell counterfeit products and/or products which infringe upon the Fleischer Studios Intellectual Property; used the Fleischer Studios IP in an unauthorized manner in order to sell, advertise, describe, mislead, disceive, and trade upon the Betty Boop brand; engaged in unfair competition; and unfairly and unjustly profited from such activities at the expenses of Fleischer Studios, Inc.

37. Plaintiff does not yet know the full extent and identity of the channels through which Defendants source and sell the Counterfeit Products. Defendants directed, supervised, and/or controlled activity infringing on Plaintiff's Trademarks and Copyrights and the sale of Counterfeit Products. Defendants have a direct financial interest in, and gain a direct financial benefit from infringing activity and realize profits from the sale of Counterfeit Products.

38. By engaging in the illegal conduct outlined herein, in addition to directly organizing and effectuating such infringing activities, each Defendant also induced, caused, and materially contributed to infringing conduct by others, including the other Defendants. There is a causal relationship between the infringing activity and the financial benefit reaped by Defendants.

39. Unless enjoined, Defendants will continue to cause irreparable harm to Plaintiff.

**COUNT I**  
**TRADEMARK INFRINGEMENT AND COUNTERFEITING (15 U.S.C. § 1114)**

40. Plaintiff repleads and incorporates by reference each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

41. This is a trademark infringement action against Defendants, based on their unauthorized use in commerce of counterfeit imitations of the federally registered Plaintiff's Trademarks in connection with the sale, offering for sale, distribution, and/or advertising of infringing goods.

42. Without the authorization or consent of Fleischer Studios, and with knowledge of Fleischer Studios's well-known ownership rights in its Betty Boop Trademarks, and with knowledge that Defendants' Counterfeit Products bear counterfeit marks, Defendants intentionally reproduced, copied, and/or colorably imitated the Betty Boop Trademarks and/or used spurious designations that are identical with, or substantially indistinguishable from, the Betty Boop Trademarks on or in connection with the manufacturing, import, export, advertising, marketing, promotion, distribution, display, offering for sale, and/or sale of Counterfeit Products.

43. Defendants have manufactured, imported, exported, advertised, marketed, promoted, distributed, displayed, offered for sale, and/or sold their Counterfeit Products to the purchasing public in direct competition with Fleischer Studios and the Betty Boop Products, in or affecting interstate commerce, and/or have acted with reckless disregard of Plaintiff's rights in and to the Betty Boop Trademarks through their participation in such activities.

44. Defendants have applied their reproductions, counterfeits, copies, and colorable imitations of the Betty Boop Trademarks to packaging, point-of-purchase materials, promotions, and/or advertisements intended to be used in commerce upon, or in connection with, the manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying,

offering for sale, and/or selling of Defendants' Counterfeit Products, which is likely to cause confusion, mistake, and deception among the general purchasing public as to the origin of the Counterfeit Products, and is likely to deceive consumers, the public, and the trade into believing that the Counterfeit Products sold by Defendants originate from, are associated with, or are otherwise authorized by Fleischer Studios, Inc., through which Defendants make substantial profits and gains to which they are not entitled in law or equity.

45. Defendants' unauthorized use of the Betty Boop Trademarks on or in connection with the Counterfeit Products was done with notice and full knowledge that such use was not authorized or licensed by Fleischer Studios, Inc., and with deliberate intent to unfairly benefit from the incalculable goodwill inherent in the Betty Boop Trademarks.

46. Defendants intentionally induce others to infringe upon Plaintiff's trademarks and/or continues to supply services with the knowledge that the recipient is using such services to engage in such trademark infringement. Defendants have the right and ability to supervise the infringing activity and have an obvious and direct financial interest in the counterfeit activity.

47. Defendants' actions constitute willful counterfeiting of the Betty Boop Trademarks in violation of 15 U.S.C. §§ 1114(1)(a)-(b), 1116(d), and 1117(b)-(c).

48. Defendants' continued intentional use of the Betty Boop Trademarks without the consent or authorization of Fleischer Studios, Inc., constitutes intentional infringement of Fleischer Studios, Inc.'s federally registered Betty Boop Trademarks in violation of §32 of the Lanham Act, 15 U.S.C. § 1114.

49. As a direct and proximate result of Defendants' illegal actions alleged herein, Defendants have caused substantial monetary loss, irreparable injury, and damage to Fleischer Studios, Inc., its business, its reputation, and its valuable rights in and to the Betty Boop



Trademarks and the goodwill associated therewith, in an amount as yet unknown. Fleischer Studios, Inc. has no adequate remedy at law for this injury, and unless immediately enjoined, Defendants will continue to cause such substantial and irreparable injury, loss, and damage to Fleischer Studios, Inc. and its valuable Betty Boop Trademarks.

50. Based on Defendants' actions as alleged herein, Fleischer Studios, Inc. is entitled to injunctive relief, damages for the irreparable harm that Fleischer Studios, Inc. has sustained, and will sustain, as a result of Defendants' unlawful and infringing actions, as well as all gains, profits, and advantages obtained by Defendants as a result thereof, enhanced discretionary damages, treble damages, and/or statutory damages of up to \$2,000,000 per-counterfeit mark per-type of goods sold, offered for sale, or distributed, and reasonable attorneys' fees and costs.

**COUNT II**  
**FALSE DESIGNATION OF ORIGIN, PASSING OFF, & UNFAIR COMPETITION**  
**(15 U.S.C. § 1125(a)/LANHAM ACT § 43(a))**

51. Plaintiff repleads and incorporates by reference each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

52. Plaintiff, as the owner of all right, title, and interest in and to the Betty Boop Trademarks has standing to maintain an action for false designation of origin and unfair competition under the Federal Trademark Statute, Lanham Act § 43(a) (15 U.S.C. § 1125).

53. Plaintiff's Trademarks are inherently distinctive and are registered with the United States Patent and Trademark Office on the Principal Register; the Betty Boop Trademarks have been continuously used and have never been abandoned; the registrations for the Betty Boop Trademarks are valid, subsisting, and in full force and effect; and many are incontestable pursuant to 15 U.S.C. § 1065.

54. Defendants' promotion, marketing, offering for sale, and sale of infringing Betty Boop Products has created and continues to create a likelihood of confusion, mistake, and deception among the public as to the affiliation, connection, or association with Plaintiff or as to the origin, sponsorship, or approval of Defendants' infringing products by Plaintiff.

55. By using the Betty Boop Trademarks in connection with the sale of unauthorized products, Defendants create a false designation of origin and a misleading representation of fact as to the origin and sponsorship of the unauthorized products.

56. Defendants' false designation of origin and misrepresentation of fact as to the origin and/or sponsorship of the unauthorized products to the general public is a willful violation of Section 43 of the Lanham Act, 15 U.S.C. § 1125.

57. Upon information and belief, Defendants' aforementioned wrongful actions have been knowing, deliberate, willful, and intended to cause confusion, to cause mistake, and to deceive the purchasing public, with the intent to trade on the goodwill and reputation of Fleischer Studios, Inc., its Betty Boop Products, and Betty Boop Trademarks.

58. As a direct and proximate result of Defendants' aforementioned actions, Defendants have caused irreparable injury to Fleischer Studios, Inc. by depriving Plaintiff of sales of its Betty Boop Products and by depriving Fleischer Studios, Inc. of the value of its Betty Boop Trademarks as commercial assets in an amount as yet unknown.

59. Plaintiff has no adequate remedy at law and, if Defendants' actions are not enjoined, Plaintiff will continue to suffer irreparable harm to its reputation and the goodwill of its brand.

**COUNT III**  
**VIOLATION OF ILLINOIS UNIFORM DECEPTIVE TRADE PRACTICES ACT**  
**(815 ILCS § 510, *et seq.*)**

60. Plaintiff repleads and incorporates by reference each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

61. Defendants have engaged in acts violating Illinois law, including, but not limited to, passing off their unauthorized products as those of Plaintiff, causing a likelihood of confusion and/or misunderstanding as to the source of Defendants' goods, thus causing a likelihood of confusion and/or misunderstanding as to an affiliation, connection, or association with genuine Betty Boop Products, through Defendants' representation that Defendants' Counterfeit Products have Plaintiff's approval, when they do not.

62. The foregoing Defendants' acts constitute a willful violation of the Illinois Uniform Deceptive Trade Practices Act, 815 ILCS § 510, *et seq.*.

63. Plaintiff has no adequate remedy at law, and Defendants' conduct has caused Plaintiff to suffer damage to its reputation and goodwill. Unless enjoined by the Court, Plaintiff will suffer future irreparable harm as a direct result of Defendants' unlawful activities.

**COUNT IV**  
**COPYRIGHT INFRINGEMENT (17 U.S.C. § 501(a))**

64. Plaintiff repleads and incorporates by reference each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

65. The Betty Boop Copyrights are the subject of multiple valid copyright registrations.

66. Plaintiff, at all relevant times, has been the holder of the copyright registrations and exclusive rights of and belonging to Fleischer Studios, Inc., including but not limited to the Betty Boop Copyrights and derivative works.

67. These copyrights have significant value and have been produced and created at considerable expense.

68. The copyrighted products include a copyright notice advising the general public that the Fleischer Studios Products are protected by the Copyright Laws of the United States.

69. Upon information and belief, Defendants had access to the copyrighted work through Plaintiff's normal business activities. After accessing Plaintiff's work, Defendants wrongfully created copies of the copyrighted work without Plaintiff's consent, and engaged in, and continue to engage in acts of widespread infringement.

70. Fleischer Studios, Inc. is informed, and thereon alleges, that Defendants further infringed Fleischer Studios Copyrights by making, or causing to be made, derivative works by producing and distributing unauthorized reproductions of the Fleischer Studios Copyrights, without permission of Fleischer Studios, Inc..

71. Each Defendant, without the permission or consent of the Plaintiff, has sold, and continues to sell, online infringing derivative works of Plaintiff's Copyrights. Each Defendant has violated Plaintiff's exclusive rights of reproduction and distribution. Each Defendant's actions constitute an infringement of Plaintiff's exclusive rights protected under the Copyright Act (17 U.S.C. §101 *et seq.*).

72. Further, as a direct result of the Defendants' acts of copyright infringement, Defendants have obtained profits they would not have otherwise realized but for their infringement of Plaintiff's Copyrights. Fleischer Studios, Inc. is entitled to disgorgement of Defendants' profits, directly and indirectly, attributable to said infringement.

73. Defendants, with knowledge of Plaintiff's Copyrights, indirectly infringed Plaintiff's Copyrights by encouraging, causing, and materially contributing to infringing conduct

by others. Defendants knowingly engaged in, supervised, and/or controlled infringing activity and the sale of Counterfeit Products, and have a direct financial interest in, and stood to gain a direct financial benefit from, such infringing activity.

74. As a result of each Defendant's infringement of Plaintiff's exclusive rights under U.S. Copyright Law, Plaintiff is entitled to relief pursuant to 17 U.S.C. §504.

75. The conduct of each Defendant is causing and, unless enjoined and restrained by this Court, will continue to cause Plaintiff great and irreparable injury that cannot fully be compensated or measured monetarily. Plaintiff has no adequate remedy at law. As such, pursuant to 17 U.S.C. §§502 and 503, Plaintiff is entitled to injunctive relief prohibiting each Defendant from further infringing Plaintiff's Copyrights, and ordering that each Defendant destroy all unauthorized and/or infringing copies and reproductions of Plaintiff's Copyrighted works. Defendants' copies, plates, and other embodiments of the copyrighted work from which copies can be reproduced should be impounded and forfeited to Fleischer Studios, Inc. as instruments of infringement, under 17 U.S.C §503.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff requests judgment against Defendants as follows:

1) That Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under, or in active concert with them be temporarily, preliminarily, and permanently enjoined and restrained from:

- a. using the Betty Boop Trademarks or any reproductions, copies, or colorable imitations thereof, in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not an authorized Betty

Boop Product, or is not authorized by Plaintiff to be sold in connection with the Betty Boop Trademarks or Betty Boop Copyrights;

- b. passing off, inducing, or enabling others to sell or pass off any product not produced under the authorization, control, or supervision of Plaintiff and approved by Plaintiff for sale under the Betty Boop Trademarks or Betty Boop Copyrights;
- c. shipping, delivering, holding for sale, transferring, or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not authorized by Plaintiff to be sold or offered for sale, and which bear the Betty Boop Trademarks, or which are derived from the Betty Boop Copyrights;
- d. further infringing the Betty Boop Trademarks and damaging Plaintiff's goodwill;
- e. using, linking to, transferring, selling, exercising control over the Defendant Internet Stores, Defendant product listings, or any other domain name or online marketplace account that is being used to sell products or inventory not authorized by Plaintiff which bear the Betty Boop Trademarks or which are derived from Plaintiff's Betty Boop Copyrights;
- f. operating and/or hosting websites at the Defendant Internet Stores, and any other domain names registered to or operated by Defendants that are involved with the distribution, marketing, advertising, offering for sale, or sale of products or inventory not authorized by Plaintiff which bear the Betty Boop Trademarks, or which are derived from Plaintiff's Betty Boop Copyrights;

2) Entry of an Order that, upon Plaintiff's request, those in privity with Defendants and those with notice of the injunction, including any online marketplaces and payment processors, such as eBay, Inc. ("eBay"), Amazon, Inc. ("Amazon"), Etsy, Inc. ("Etsy"), ContextLogic, Inc.

(“Wish”), eCrater, Inc. (“eCrater”), Bonanza, Inc. (“Bonanza”), Alibaba Group Holding Ltd., including Alipay.com Co., Ltd. (“Alipay”), AliExpress, Inc. (“AliExpress”), and Alibaba.com (“Alibaba”), and similar websites, social media platforms, Facebook, YouTube, LinkedIn, Twitter, Internet search engines such as Google, Bing, and Yahoo, web hosts for the Defendant Internet Stores, and domain name registrars, shall:

- a. disable and cease providing services for any accounts through which Defendants engage in the sale of products not authorized by Plaintiff which bear Betty Boop Trademarks, including accounts associated with Defendants listed on Schedule A;
- b. disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of products not authorized by Plaintiff which bear the Betty Boop Trademarks, or which are derived from Plaintiff’s Betty Boop Copyrights; and,
- c. take all steps necessary to prevent links to the Defendant Internet Stores identified on Schedule A from displaying in search results, including, but not limited to, removing links to the Defendant Internet Stores from any search index.

3) That Defendants account for, and pay to, Plaintiff all profits realized by Defendants by reason of Defendants’ unlawful acts herein alleged;

4) For Judgment in favor of Plaintiff against Defendants that they have willfully infringed Plaintiff’s rights in its federally registered Trademarks, pursuant to 15 U.S.C. § 1114;

5) That Plaintiff be awarded actual damages, statutory damages, and/or other available damages, at the election of Plaintiff; and that the amount of damages for infringement are increased by a sum not to exceed three times the amount thereof as provided by 15 U.S.C. § 1117;

6) For Judgment in favor of Plaintiff against Defendants that they have: a) willfully infringed Plaintiff's rights in its federally registered copyrights pursuant to 17 U.S.C. §501; and, b) otherwise injured the business reputation and business of Plaintiff by Defendants' acts and conduct set forth in this Complaint;

7) That Plaintiff be awarded actual damages, statutory damages, and/or other available damages pursuant to 17 U.S.C. §504, at the election of Plaintiff;

8) That Plaintiff be awarded its reasonable attorneys' fees and costs; and,

9) Any and all other relief that this Court deems just and proper.

DATED: July 26, 2021

Respectfully submitted,

/s/ Alison Carter

Ann Marie Sullivan

Alison Carter

Sofia Quezada

AM Sullivan Law, LLC

1440 W. Taylor St., Suite 515

Chicago, Illinois 60607

Telephone: 224-258-9378

E-mail: [ams@amsullivanlaw.com](mailto:ams@amsullivanlaw.com)

**ATTORNEYS FOR PLAINTIFF**





**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

FLEISCHER STUDIOS, INC.,

PLAINTIFF,

V.

THE PARTNERSHIPS AND UNINCORPORATED  
ASSOCIATIONS IDENTIFIED ON SCHEDULE A,

DEFENDANTS.

CASE No. 1:21-cv-03919

**FILED UNDER SEAL**

**EXHIBIT 1 TO THE COMPLAINT**

**Int. Cl.: 9**

**Prior U.S. Cls.: 21, 23, 26, 36 and 38**

**Reg. No. 2,374,258**

**United States Patent and Trademark Office**

**Registered Aug. 8, 2000**

**TRADEMARK  
PRINCIPAL REGISTER**

**BETTY BOOP**

HEARST HOLDINGS, INC. (DELAWARE CORPORATION)  
959 EIGHTH AVENUE  
NEW YORK, NY 10019 AND

FLEISCHER STUDIOS, INC. (CALIFORNIA CORPORATION)  
10160 CIELO DR.  
BEVERLY HILLS, CA 90210

FOR: MAGNETS, CASES SPECIALLY ADAPTED FOR HOLDING PAGERS, ELECTRIC SWITCH PLATES, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 11-1-1993; IN COMMERCE 11-1-1993.  
OWNER OF U.S. REG. NO. 2,201,909.

SER. NO. 75-489,074, FILED 5-21-1998.

JENNIFER DIXON, EXAMINING ATTORNEY

**Int. Cl.: 16**

**Prior U.S. Cls.: 2, 5, 22, 23, 29, 37, 38 and 50**

**Reg. No. 2,378,474**

**United States Patent and Trademark Office**

**Registered Aug. 22, 2000**

**TRADEMARK  
PRINCIPAL REGISTER**

**BETTY BOOP**

HEARST HOLDINGS, INC. (DELAWARE CORPORATION)  
959 EIGHTH AVENUE  
NEW YORK, NY 10019 AND

FLEISCHER STUDIOS, INC. (CALIFORNIA CORPORATION)  
10160 CIELO DR.  
BEVERLY HILLS, CA 90210

FOR: TRADING CARDS, PAPER GIFT BAGS, CARDBOARD MAILERS, BOOKS FOCUSING ON COMIC STRIP REPRINTS, CALENDARS, STICKERS, POSTCARDS, GREETING CARDS, CARDBOARD GIFT BOXES, ADDRESS AND TELEPHONE BOOKS, PENS AND STATIONERY SETS CONSISTING OF

PENCILS, DRAWING OR UNGRADUATED RULERS, ERASERS, ADHESIVE TAPE DISPENSER FOR HOUSEHOLD OR STATIONERY USE, PENCIL CASES, STENCILS, PLASTIC PAPER CLIPS, DECORATIVE PENCIL TOP ORNAMENTS AND PAPER, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29, 37, 38 AND 50).

FIRST USE 12-31-1992; IN COMMERCE 12-31-1992.

OWNER OF U.S. REG. NO. 2,201,909.

"BETTY BOOP" DOES NOT IDENTIFY A LIVING INDIVIDUAL.

SER. NO. 75-489,022, FILED 5-21-1998.

JENNIFER DIXON, EXAMINING ATTORNEY

Int. Cls.: 3, 5, 6, 11, 14, 18, 20, 21, 24, 25, 26, 28 and 41

Prior U.S. Cls.: 1, 2, 3, 4, 6, 12, 13, 14, 18, 21,  
22, 23, 25, 27, 28, 29, 30, 31, 32, 33, 34, 37,  
38, 39, 40, 41, 42, 44, 46, 50, 51, 52, 100, 101  
and 107

Reg. No. 2,430,642

**United States Patent and Trademark Office**

Registered Feb. 27, 2001

**TRADEMARK  
SERVICE MARK  
PRINCIPAL REGISTER**

**BETTY BOOP**

HEARST HOLDINGS, INC. (DELAWARE CORPORATION)  
959 EIGHTH AVENUE  
NEW YORK, NY 10019 AND

FLEISCHER STUDIOS, INC. (CALIFORNIA CORPORATION)  
10160 CIELO DRIVE  
BEVERLY HILLS, CA 90210

FOR: BUBBLE BATH, BODY WASH, AFTER BATH SPLASH, IN CLASS 3 (U.S. CLS. 1, 4, 6, 50, 51 AND 52).

FIRST USE 1-1-1997; IN COMMERCE 1-1-1997.  
FOR: AIR FRESHENERS, IN CLASS 5 (U.S. CLS. 6, 18, 44, 46, 51 AND 52).

FIRST USE 10-1-1981; IN COMMERCE 10-1-1981.  
FOR: KEY CHAINS MADE OF METAL, IN CLASS 6 (U.S. CLS. 2, 12, 13, 14, 23, 25 AND 50).

FIRST USE 6-1-1991; IN COMMERCE 6-1-1991.  
FOR: HANDHELD HAIR DRYERS, TOILET SEATS, IN CLASS 11 (U.S. CLS. 13, 21, 23, 31 AND 34).

FIRST USE 9-1-1996; IN COMMERCE 9-1-1996.  
FOR: JEWELRY OF NON PRECIOUS METALS, CLOCKS, WATCHES, IN CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).

FIRST USE 1-1-1990; IN COMMERCE 1-1-1990.  
FOR: WALLETs MADE OF LEATHER, UMBRELLAS, TOTE BAGS, BACK PACKS AND PURSES, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FIRST USE 6-1-1994; IN COMMERCE 6-1-1994.

FOR: HANDHELD MIRRORS, SNOW GLOBES, PICTURE FRAMES, PILL BOXES SOLD EMPTY, IN CLASS 20 (U.S. CLS. 2, 13, 22, 25, 32 AND 50).

FIRST USE 6-1-1990; IN COMMERCE 6-1-1990.  
FOR: FIGURINES MADE OF PORCELAIN, DRINKING GLASSES, PLASTIC WATER BOTTLES, LUNCH BOXES, COOKIE JARS, SPOON RESTS, KITCHEN TOOL HOLDERS, COMPACTS SOLD EMPTY, TEA SETS, AND PLATES, IN CLASS 21 (U.S. CLS. 2, 13, 23, 29, 30, 33, 40 AND 50).

FIRST USE 9-1-1991; IN COMMERCE 9-1-1991.  
FOR: FABRIC, NAMELY, COTTON, POLYESTER, COTTON/POLYESTER BLEND, RAMIE, WOOL, DENIM, FLEECE, RAYON, NYLON; POT HOLDERS, TOWELS, WASH CLOTHS AND DISH TOWELS, IN CLASS 24 (U.S. CLS. 42 AND 50).

FIRST USE 6-1-1986; IN COMMERCE 6-1-1986.  
FOR: SUN VISORS, SHIRTS, SHORTS, SWEATSHIRTS, TOPS, PAJAMAS, SLEEP SHIRTS, SNEAKERS, JEANS, JEAN JACKETS, JEAN VESTS, JEAN SHIRTS, JEAN SHORTS, CAMISOLES, ROBES, LEATHER BELTS, COSTUMES AND MASKS SOLD IN CONNECTION THEREWITH AND TIES, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 3-1-1987; IN COMMERCE 3-1-1987.  
FOR: ORNAMENTAL BUTTON COVERS AND ORNAMENTAL NOVELTY PINS, IN CLASS 26 (U.S. CLS. 37, 39, 40, 42 AND 50).

FIRST USE 7-1-1992; IN COMMERCE 7-1-1992.  
FOR: SOFT SQUEEZABLE BALLS, BEACH BALLS, PLASTIC VINYL PLAY BALLS, SOFT FLYING DISKS, SQUEEZE TOYS, CHRISTMAS ORNA-

2,430,642

MENTS, BUBBLE MAKING WAND AND SOLUTION SET, DOLLS AND MAGNETIC DOLL SETS CONSISTING OF FLAT MAGNETIC DOLLS WITH FLAT MAGNETIC ARTICLES OF CLOTHING AND ACCESSORIES, IN CLASS 28 (U.S. CLS. 22, 23, 38 AND 50).

FIRST USE 6-1-1992; IN COMMERCE 6-1-1992.  
FOR: AMUSEMENT PARK SERVICES, IN CLASS 41 (U.S. CLS. 100, 101 AND 107).

FIRST USE 6-1-1995; IN COMMERCE 6-1-1995.  
OWNER OF U.S. REG. NO. 2,201,909.

"BETTY BOOP" DOES NOT IDENTIFY A LIVING INDIVIDUAL.

SER. NO. 75-489,300, FILED 5-21-1998.

JENNIFER DIXON, EXAMINING ATTORNEY

**Int. Cl.: 35**

**Prior U.S. Cls.: 100, 101 and 102**

**Reg. No. 2,392,715**

**United States Patent and Trademark Office**

**Registered Oct. 10, 2000**

**SERVICE MARK  
PRINCIPAL REGISTER**

**BETTY BOOP**

HEARST HOLDINGS, INC. (DELAWARE CORPORATION)  
959 EIGHTH AVENUE  
NEW YORK, NY 10019 AND

FLEISCHER STUDIOS, INC. (CALIFORNIA CORPORATION)  
10160 CIELO DRIVE  
BEVERLY HILLS, CA 90210

FOR: COMPUTERIZED ON-LINE ORDERING  
SERVICES IN THE FIELD OF COMPUTER GEN-

ERATED ELECTRONIC GREETING CARDS DISTRIBUTED OVER A GLOBAL COMPUTER NETWORK, IN CLASS 35 (U.S. CLS. 100, 101 AND 102).

FIRST USE 9-0-1998; IN COMMERCE 9-0-1998.

OWNER OF U.S. REG. NO. 2,201,909.

"BETTY BOOP" DOES NOT IDENTIFY A LIVING INDIVIDUAL.

SER. NO. 75-590,200, FILED 11-17-1998.

JENNIFER DIXON, EXAMINING ATTORNEY

# United States of America

United States Patent and Trademark Office

## BETTY BOOP

**Reg. No. 6,193,127**

**Registered Nov. 10, 2020**

**Int. Cl.: 41**

**Service Mark**

**Principal Register**

Hearst Holdings, Inc. (DELAWARE CORPORATION)  
300 West 57th Street  
New York, NEW YORK 10019

Fleischer Studios, Inc. (CALIFORNIA CORPORATION)  
10160 Cielo Drive  
Beverly Hills, CALIFORNIA 90210

CLASS 41: ENTERTAINMENT SERVICES, NAMELY, PROVIDING  
ENTERTAINMENT INFORMATION VIA WEBSITES AND SOCIAL MEDIA  
WEBSITES

FIRST USE 12-00-2008; IN COMMERCE 12-00-2008

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

OWNER OF U.S. REG. NO. 2430642, 2378474, 2374258

SER. NO. 88-718,025, FILED 12-06-2019



*Andrei Iancu*

Director of the United States  
Patent and Trademark Office





**Int. Cl.: 16**

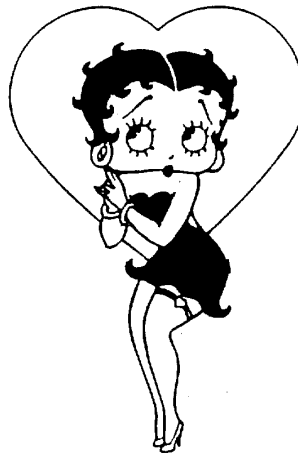
**Prior U.S. Cls.: 2, 5, 22, 23, 29, 37, 38 and 50**

**Reg. No. 2,349,360**

**United States Patent and Trademark Office**

**Registered May 16, 2000**

**TRADEMARK  
PRINCIPAL REGISTER**



HEARST HOLDINGS, INC. (DELAWARE CORPORATION)  
959 EIGHTH AVENUE  
NEW YORK, NY 10019 AND

FLEISCHER STUDIOS, INC. (CALIFORNIA CORPORATION)  
10160 CIELO DRIVE  
BEVERLY HILLS, CA 90210

FOR: TRADING CARDS, PAPER GIFT BAGS, CARDBOARD MAILERS, BOOKS FOCUSING ON COMIC STRIP REPRINTS, CALENDARS, STICKERS, POSTCARDS, GREETING CARDS, CARDBOARD GIFT BOXES, ADDRESS AND TELEPHONE BOOKS, PENS AND STATION-

ERY SETS CONSISTING OF PENCILS, DRAWING AND UNGRADUATED RULERS, ERASERS, ADHESIVE TAPE DISPENSER FOR HOUSEHOLD OR STATIONERY USE, PENCIL CASE, STENCILS, PLASTIC PAPER CLIP, DECORATIVE PENCIL TOP ORNAMENT, AND PAPER, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29, 37, 38 AND 50).

FIRST USE 12-31-1992; IN COMMERCE 12-31-1992.

OWNER OF U.S. REG. NO. 2,201,909.

SER. NO. 75-489,023, FILED 5-21-1998.

JENNIFER DIXON, EXAMINING ATTORNEY

Int. Cls.: 5, 11, 14, 18, 20, 21, 24, 25 and 28

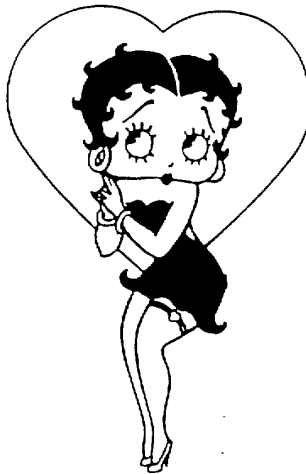
Prior U.S. Cls.: 1, 2, 3, 6, 13, 18, 21, 22, 23,  
25, 27, 28, 29, 30, 31, 32, 33, 34, 38, 39, 40,  
41, 42, 44, 46, 50, 51 and 52

Reg. No. 2,361,245

**United States Patent and Trademark Office**

Registered June 27, 2000

**TRADEMARK  
PRINCIPAL REGISTER**



HEARST HOLDINGS, INC. (DELAWARE CORPORATION)  
959 EIGHTH AVENUE  
NEW YORK, NY 10019 AND

FLEISCHER STUDIOS, INC. (CALIFORNIA CORPORATION)  
10160 CIELO DRIVE  
BEVERLY HILLS, CA 90210

FOR: AIR FRESHENERS, IN CLASS 5 (U.S. CLS. 6, 18, 44, 46, 51 AND 52).

FIRST USE 12-31-1994; IN COMMERCE 12-31-1994.

FOR: TOILET SEATS, IN CLASS 11 (U.S. CLS. 13, 21, 23, 31 AND 34).

FIRST USE 9-1-1996; IN COMMERCE 9-1-1996.

FOR: JEWELRY OF NON PRECIOUS METALS, CLOCKS, WATCHES, IN CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).

FIRST USE 12-1-1993; IN COMMERCE 12-1-1993.

FOR: WALLETTS MADE OF LEATHER, UMBRELLAS, TOTE BAGS, BACK PACKS AND PURSES, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FIRST USE 6-1-1994; IN COMMERCE 6-1-1994.

FOR: HANDHELD MIRRORS, SNOW GLOBES, PICTURE FRAMES, PILL BOXES SOLD EMPTY, IN CLASS 20 (U.S. CLS. 2, 13, 22, 25, 32 AND 50).

FIRST USE 1-1-1994; IN COMMERCE 1-1-1994.

FOR: FIGURINES MADE OF PORCELAIN, DRINKING GLASSES, PLASTIC WATER BOTTLES, LUNCH BOXES, COOKIE JARS, SPOON RESTS, KITCHEN TOOL HOLDERS, COMPACTS SOLD EMPTY, TEA SETS, AND PLATES, IN CLASS 21 (U.S. CLS. 2, 13, 23, 29, 30, 33, 40 AND 50).

**2,361,245**

FIRST USE 9-1-1991; IN COMMERCE 9-1-1991.  
FOR: POT HOLDERS, TOWELS, WASH CLOTHS  
AND DISH TOWELS, IN CLASS 24 (U.S. CLS. 42  
AND 50).

FIRST USE 1-1-1995; IN COMMERCE 1-1-1995.  
FOR: SUN VISORS, SHIRTS, SHORTS,  
SWEATSHIRTS, TOPS, PAJAMAS, SLEEP SHIRTS,  
SNEAKERS, JEANS, JEAN JACKETS, JEAN VESTS,  
JEAN SHIRTS, JEAN SHORTS, CAMISOLES, ROBES,  
LEATHER BELTS, COSTUMES AND MASKS SOLD  
IN CONNECTION THEREWITH AND TIES, IN  
CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 10-1-1988; IN COMMERCE 10-1-1988.  
FOR: SOFT SQUEEZABLE TOY BALLS, BEACH  
BALLS, PLASTIC VINYL PLAY BALLS, SOFT FLY-

ING DISKS, SQUEEZE TOYS, CHRISTMAS ORNA-  
MENTS, BUBBLE MAKING WAND AND SOLUTION  
SET, DOLLS AND MAGNETIC DOLL SETS CON-  
SISTING OF FLAT MAGNETIC DOLLS WITH FLAT  
MAGNETIC ARTICLES OF CLOTHING AND ACCES-  
SORIES, IN CLASS 28 (U.S. CLS. 22, 23, 38 AND  
50).

FIRST USE 10-1-1993; IN COMMERCE 10-1-1993.

OWNER OF U.S. REG. NO. 2,201,909.

SER. NO. 75-491,221, FILED 5-21-1998.

JENNIFER DIXON, EXAMINING ATTORNEY

**Int. Cl.: 9**

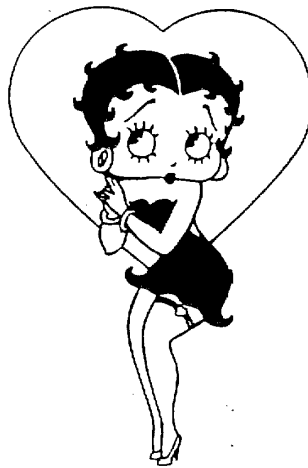
**Prior U.S. Cls.: 21, 23, 26, 36 and 38**

**Reg. No. 2,376,545**

**United States Patent and Trademark Office**

**Registered Aug. 15, 2000**

**TRADEMARK  
PRINCIPAL REGISTER**



HEARST HOLDINGS, INC. (DELAWARE CORPORATION)  
959 EIGHTH AVENUE  
NEW YORK, NY 10019 AND

FLEISCHER STUDIOS, INC. (CALIFORNIA CORPORATION)  
10160 CIELO DRIVE  
BEVERLY HILLS, CA 90210

FOR: MAGNETS, COMPUTER PROGRAMS FOR  
CREATING ANIMATED CARTOONS AND ASSIST-

ING IN THE COMPUTERIZED GRAPHIC DESIGN OF  
CARTOON CHARACTERS, SCREEN SAVERS IN THE  
FIELD OF CARTOON CHARACTERS, CASES SPECIALLY  
ADAPTED FOR HOLDING PAGERS, ELECTRIC SWITCH  
PLATES, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36  
AND 38).

FIRST USE 11-1-1993; IN COMMERCE 11-1-1993.  
OWNER OF U.S. REG. NO. 2,201,909.

SER. NO. 75-489,024, FILED 5-21-1998.

JENNIFER DIXON, EXAMINING ATTORNEY

# United States of America

United States Patent and Trademark Office



**Reg. No. 6,193,140**

**Registered Nov. 10, 2020**

**Int. Cl.: 41**

**Service Mark**

**Principal Register**

Hearst Holdings, Inc. (DELAWARE CORPORATION)  
300 West 57th Street  
New York, NEW YORK 10019

Fleischer Studios, Inc. (CALIFORNIA CORPORATION)  
10160 Cielo Drive  
Beverly Hills, CALIFORNIA 90210

CLASS 41: ENTERTAINMENT SERVICES, NAMELY, PROVIDING  
ENTERTAINMENT INFORMATION VIA WEBSITES AND SOCIAL MEDIA  
WEBSITES

FIRST USE 12-00-2008; IN COMMERCE 12-00-2008

The mark consists of the design image of a woman's face looking over her right shoulder on a  
background of alternating solid circles and hearts.

OWNER OF U.S. REG. NO. 2376545, 2349360, 2361245

SER. NO. 88-721,331, FILED 12-10-2019



*Andrew Kamen*



**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

FLEISCHER STUDIOS, INC.,

PLAINTIFF,

V.

THE PARTNERSHIPS AND UNINCORPORATED  
ASSOCIATIONS IDENTIFIED ON SCHEDULE A,

DEFENDANTS.

CASE No. 1:21-cv-03919

**FILED UNDER SEAL**

**EXHIBIT 2 TO THE COMPLAINT**

FLEISCHER STUDIOS, INC.  
v.  
THE PARTNERSHIPS AND UNINCORPORATED  
ASSOCIATIONS IDENTIFIED ON SCHEDULE A

**EXHIBIT 2**

**COPYRIGHT REGISTRATIONS**

<b>No.</b>	<b>Full Title</b>	<b>Copyright Number</b>	<b>Date</b>
1	<i>Baby Boop; cartoon character derived from Betty Boop</i>	V2176P422	1986
2	<i>Betty &amp; 1 other title; literary properties &amp; cartoon characters.</i>	V2251P047	1987
3	<i>Betty Boop.</i>	V3412D773	1998
4	<i>Betty Boop &amp; 1 other title; characters.</i>	V2811P001	1993
5	<i>Betty Boop and her boop troupe.</i>	PAu002340698	1998
6	<i>Betty Boop, and other characters set forth in work known as Betty Boop and her gang / R247925.</i>	V2854P059	1993
7	<i>Betty Boop; cartoon feature / R258317.</i>	V1829P169	1981
8	<i>Betty Boop's Guide to Life.</i>	TX0007429502	2011
9	<i>Betty Boop's Hollywood mystery / a production of Big Pictues and King Features Entertainment, Inc. ; directed by George Evelyn.</i>	PA0000593463	1990
10	<i>Betty Boop's misguided tours.</i>	PAu002134231	1996
11	<i>Betty Boop's misguided tours : a proposal for an animated cartoon television series.</i>	VAu000395284	1997
12	<i>Betty Boop's Sunday best / by Max Fleischer ; edited by Bill Blackbeard.</i>	VA0000752612	1995
13	<i>Betty, cartoon character &amp; 1 other title.</i>	V1821P291	1980
14	<i>Betty, cartoon character &amp; 1 other title; books / By Max Fleischer.</i>	V2020P664	1983
15	<i>King Features Betty Boop style guide.</i>	CSN0087651	1990
16	<i>King Features Betty Boop style guide.</i>	CSN0087651	1989
17	<i>No titles given.</i>	V3071P014	1995
18	<i>No titles given for animated television series, including teleplay written by Ian Pearson.</i>	V3496D421	2003
19	<i>Outline for a half hour animated Betty Boop cartoon series.</i>	PAu001885883	1994
20	<i>Romance of Betty Boop &amp; 2 other titles.</i>	V2732P338	1992

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

FLEISCHER STUDIOS, INC.,

PLAINTIFF,

v.

THE PARTNERSHIPS AND UNINCORPORATED  
ASSOCIATIONS IDENTIFIED ON SCHEDULE A,

DEFENDANTS.

CASE NO.: 1:21-cv-03919

**FILED UNDER SEAL**

**SCHEDULE A TO THE AMENDED COMPLAINT**

<b>NO</b>	<b>DEFENDANT NAME/SELLER ALIAS</b>	<b>MARKETPLACE URL</b>
1	A-A Store	aliexpress.com/store/4995189
2	Aiboy Cases Store	aliexpress.com/store/4422011
3	Ailove Cases Store	aliexpress.com/store/4481001
4	allhat Store	aliexpress.com/store/2950200
5	Baby Teeshow Store	aliexpress.com/store/5013111
6	Baby-BoyGirl Store	aliexpress.com/store/4931012
7	BALRED Global Store	aliexpress.com/store/4990317
8	BESOS Store	aliexpress.com/store/4995200
9	BUSTEDTEES2 Store	aliexpress.com/store/5243103
10	BWAYCASE Store	aliexpress.com/store/2469012
11	CDJLFH3 Store	aliexpress.com/store/1303826
12	chengfeng Store	aliexpress.com/store/5781827
13	daidaihotsales57 Store	aliexpress.com/store/5003425
14	daughter0418 Store	aliexpress.com/store/910451114
15	Decals preferred Store	aliexpress.com/store/910975076
16	Design Glass Cabochon Store	aliexpress.com/store/3623080
17	DI TWO Store	aliexpress.com/store/5063476
18	Digital World 2216 Store	aliexpress.com/store/911138288
19	DIY Jerry Home	aliexpress.com/store/1603024
20	DIYCASE47 Store	aliexpress.com/store/4997312
21	DIYJewelryLove Store	aliexpress.com/store/427656
22	dongsheng jewelry Jennifer Store	aliexpress.com/store/5874235
23	earlfamily V Store	aliexpress.com/store/5373088
24	Elainely-Lee Store	aliexpress.com/store/910335200
25	Enjoy Oneself Store	aliexpress.com/store/5421178



<b>No</b>	<b>DEFENDANT NAME/SELLER ALIAS</b>	<b>MARKETPLACE URL</b>
26	fdszy buibui life Store	aliexpress.com/store/5879477
27	feimeng jewelry Official Store	aliexpress.com/store/3990035
28	Feng-F Store	aliexpress.com/store/5881873
29	Fun Life Global Store	aliexpress.com/store/5378237
30	GabbyCases Store	aliexpress.com/store/911263215
31	Global Apparel Store	aliexpress.com/store/3177018
32	HelloWelcome Store	aliexpress.com/store/911124226
33	HEYu jewelry Official Store	aliexpress.com/store/2179058
34	Hot-Oscar Home	aliexpress.com/store/1459325
35	HOYi Store	aliexpress.com/store/4432068
36	Huanyan Store	aliexpress.com/store/2185146
37	iron on Stickers Store	aliexpress.com/store/910559390
38	jemy Store	aliexpress.com/store/5840003
39	JFCase Store	aliexpress.com/store/5366183
40	JWP14 Store	aliexpress.com/store/910647019
41	kefeng jewelry Official Store	aliexpress.com/store/2134180
42	Kids Paradies Store	aliexpress.com/store/5592047
43	Komic	aliexpress.com/store/1830713
44	Krajews Factory Cases Store	aliexpress.com/store/5780994
45	Lanyards Store	aliexpress.com/store/5252095
46	LeadingTrend Store	aliexpress.com/store/5878450
47	Libreclans Dropship Store	aliexpress.com/store/910910013
48	Libreclans Store	aliexpress.com/store/910362271
49	livecustom Store	aliexpress.com/store/910677010
50	Lovejewelry Store	aliexpress.com/store/5001453
51	Lucky-Dream Store	aliexpress.com/store/1924094
52	Luckys Accessories Factory Store	aliexpress.com/store/910783052
53	Maiya 3C Shop Store	aliexpress.com/store/2631048
54	Maiyaca phone accessories Store	aliexpress.com/store/2411078
55	MAO Personalized Customized Store	aliexpress.com/store/5071314
56	Melissalove Store	aliexpress.com/store/211410
57	Milky Store	aliexpress.com/store/5795109
58	MISTAR Store	aliexpress.com/store/5781125
59	MIXX	aliexpress.com/store/627359
60	Mo Shang Jewelry Store	aliexpress.com/store/2660213
61	Moe Cerf Global chain Store	aliexpress.com/store/2923073
62	MQCHUN Official Store	aliexpress.com/store/2834021
63	nanxun jewel Store	aliexpress.com/store/5004027
64	necklacezgb Store	aliexpress.com/store/5881703
65	OGM 08 Store	aliexpress.com/store/900254199
66	Peter Clothes Store	aliexpress.com/store/910988066
67	Phone Cases XMZHC Store	aliexpress.com/store/910448049
68	PI PI XIA TShirt Store	aliexpress.com/store/4380099
69	Power1 Store	aliexpress.com/store/4704099

<b>No</b>	<b>DEFENDANT NAME/SELLER ALIAS</b>	<b>MARKETPLACE URL</b>
70	prcpop Store	aliexpress.com/store/3620124
71	Princess-Room Store	aliexpress.com/store/3095115
72	qinya889 Store	aliexpress.com/store/5019146
73	RetroJaneDream Store	aliexpress.com/store/910356130
74	Ring Li Store	aliexpress.com/store/5372180
75	Romantic Phone Accessories Store	aliexpress.com/store/5799792
76	Romantic Yong Store	aliexpress.com/store/2386006
77	Rose Fashion Club	aliexpress.com/store/1754190
78	Rose Lin	aliexpress.com/store/1433133
79	RRKFT128 Store	aliexpress.com/store/911131232
80	SeeMoreCarLife Store	aliexpress.com/store/2838077
81	Shop2070017 Store	aliexpress.com/store/2070017
82	Shop2179015 Store	aliexpress.com/store/2179015
83	Shop3374014 Store	aliexpress.com/store/3374014
84	Shop3734026 Store	aliexpress.com/store/3734026
85	Shop3751015 Store	aliexpress.com/store/3751015
86	Shop4418112 Store	aliexpress.com/store/4418112
87	Shop4619038 Store	aliexpress.com/store/4619038
88	Shop4670047 Store	aliexpress.com/store/4670047
89	Shop4980055 Store	aliexpress.com/store/4980055
90	Shop4995438 Store	aliexpress.com/store/4995438
91	Shop5002325 Store	aliexpress.com/store/5002325
92	Shop5022111 Store	aliexpress.com/store/5022111
93	Shop5023123 Store	aliexpress.com/store/5023123
94	Shop5058355 Store	aliexpress.com/store/5058355
95	Shop5074248 Store	aliexpress.com/store/5074248
96	Shop5115020 Store	aliexpress.com/store/5115020
97	Shop5126017 Store	aliexpress.com/store/5126017
98	Shop5159045 Store	aliexpress.com/store/5159045
99	Shop5260224 Store	aliexpress.com/store/5260224
100	Shop5286008 Store	aliexpress.com/store/5286008
101	Shop5549001 Store	aliexpress.com/store/5549001
102	Shop5592147 Store	aliexpress.com/store/5592147
103	Shop5597046 Store	aliexpress.com/store/5597046
104	Shop5716052 Store	aliexpress.com/store/5716052
105	Shop5721082 Store	aliexpress.com/store/5721082
106	Shop5729348 Store	aliexpress.com/store/5729348
107	Shop5736282 Store	aliexpress.com/store/5736282
108	Shop5747122 Store	aliexpress.com/store/5747122
109	Shop5777395 Store	aliexpress.com/store/5777395
110	Shop5780076 Store	aliexpress.com/store/5780076
111	Shop5781767 Store	aliexpress.com/store/5781767
112	Shop5791753 Store	aliexpress.com/store/5791753
113	Shop5875516 Store	aliexpress.com/store/5875516

No	DEFENDANT NAME/SELLER ALIAS	MARKETPLACE URL
114	Shop5876812 Store	aliexpress.com/store/5876812
115	Shop5876834 Store	aliexpress.com/store/5876834
116	Shop5962055 Store	aliexpress.com/store/5962055
117	Shop900236180 Store	aliexpress.com/store/900236180
118	Shop900247034 Store	aliexpress.com/store/900247034
119	Shop900251316 Store	aliexpress.com/store/900251316
120	Shop910321358 Store	aliexpress.com/store/910321358
121	Shop910322023 Store	aliexpress.com/store/910322023
122	Shop910323131 Store	aliexpress.com/store/910323131
123	Shop910329231 Store	aliexpress.com/store/910329231
124	Shop910347316 Store	aliexpress.com/store/910347316
125	Shop910351198 Store	aliexpress.com/store/910351198
126	Shop910543160 Store	aliexpress.com/store/910543160
127	Shop910564363 Store	aliexpress.com/store/910564363
128	Shop910566340 Store	aliexpress.com/store/910566340
129	Shop910641044 Store	aliexpress.com/store/910641044
130	Shop910734088 Store	aliexpress.com/store/910734088
131	Shop910746132 Store	aliexpress.com/store/910746132
132	Shop910756037 Store	aliexpress.com/store/910756037
133	Shop910820023 Store	aliexpress.com/store/910820023
134	Shop910824001 Store	aliexpress.com/store/910824001
135	Shop910834021 Store	aliexpress.com/store/910834021
136	Shop910841017 Store	aliexpress.com/store/910841017
137	Shop910875004 Store	aliexpress.com/store/910875004
138	Shop910883006 Store	aliexpress.com/store/910883006
139	Shop910934041 Store	aliexpress.com/store/910934041
140	Shop910936052 Store	aliexpress.com/store/910936052
141	Shop910981034 Store	aliexpress.com/store/910981034
142	Shop910984075 Store	aliexpress.com/store/910984075
143	Shop910986054 Store	aliexpress.com/store/910986054
144	Shop911036086 Store	aliexpress.com/store/911036086
145	Shop911085013 Store	aliexpress.com/store/911085013
146	Shop911132288 Store	aliexpress.com/store/911132288
147	Shop911133113 Store	aliexpress.com/store/911133113
148	Shop911137292 Store	aliexpress.com/store/911137292
149	Sisters jewellery Store	aliexpress.com/store/2816091
150	SONSPEE NEW Store	aliexpress.com/store/5365281
151	store name hasSnsWordCoco5733 Store	aliexpress.com/store/5793043
152	Sunny2014	aliexpress.com/store/1213609
153	SYU ENNSENN Store	aliexpress.com/store/4390069
154	TAKANE Store	aliexpress.com/store/2955144
155	tancredy Official Store	aliexpress.com/store/2076013
156	Tender 02 Store	aliexpress.com/store/900243171
157	The 1990 Phone Cases Store	aliexpress.com/store/2659020

No	DEFENDANT NAME/SELLER ALIAS	MARKETPLACE URL
158	TheOne Apparel Store	aliexpress.com/store/3970024
159	TopBrandcases Store	aliexpress.com/store/5632157
160	Two Questions Store	aliexpress.com/store/911073011
161	Uwanna Store	aliexpress.com/store/5873244
162	VARIY Store	aliexpress.com/store/5007062
163	VOET.B Official Store	aliexpress.com/store/5733046
164	volkray Store	aliexpress.com/store/4592004
165	WAY Store	aliexpress.com/store/2408103
166	weijingshotsales44 Store	aliexpress.com/store/4884003
167	women's Tshirt Store	aliexpress.com/store/4043034
168	WorldLuxuryBrandCase Store	aliexpress.com/store/910323208
169	XIAN XIAN 8 Store	aliexpress.com/store/4945017
170	Yinuoda Official Store	aliexpress.com/store/2410020
171	YiTing03 Store	aliexpress.com/store/5670005
172	You Life Lannida Store	aliexpress.com/store/3616095
173	YRW Store	aliexpress.com/store/2546013
174	Yu hai automobile Store	aliexpress.com/store/3575031
175	yuan46 Store	aliexpress.com/store/4665207
176	YUAO910557200 Store Store	aliexpress.com/store/910557200
177	yunhai Store	aliexpress.com/store/910557392
178	YW Store	aliexpress.com/store/3881049
179	yw120 Store	aliexpress.com/store/910410009
180	zhuojie Store	aliexpress.com/store/2824096
181	CCCChenrongwei	amazon.com/sp?seller=AGI88RHRVRNSO
182	ChaoYangQuFaShengFuRiZaDian1	amazon.com/sp?seller=A11XJDW0779URY
183	CharacterUSA	amazon.com/sp?seller=AHQBP4TUOMYRX
184	CHENhf	amazon.com/sp?seller=A2EMMEZ4LR22UK
185	Cwymxly	amazon.com/sp?seller=A1Q7ZEHSF5LOSQ
186	de tong jian she ji tuan	amazon.com/sp?seller=A1Y00M3H2FNYRS
187	DerekDerekDerek	amazon.com/sp?seller=ATTX0WNMCR97V
188	DianaRMurphy	amazon.com/sp?seller=A34AZJF5E7AJ5T
189	DODOD	amazon.com/sp?seller=AQ8ST4JNPUTT7
190	enBeiXi	amazon.com/sp?seller=A2P5XYVBHSWGQ7
191	Eric J Pearson	amazon.com/sp?seller=A91P2WOO8ANCM
192	FuRongQuJinShouZhiShouJiFuLiaoShangHang	amazon.com/sp?seller=A3JKC0ELDBVWWZ
193	golubaiatatjanaVEST	amazon.com/sp?seller=ATLD6A6R6G7L6
194	Hang On To You	amazon.com/sp?seller=A2L76SPX0OMPMK
195	HBSWUI Store	amazon.com/sp?seller=A2MMJQ0DZDP0EL
196	HKsdfaw	amazon.com/sp?seller=A1OHKBBF5P6A72
197	hongrenfushangmao	amazon.com/sp?seller=A58DPX7YOP3JY
198	Huafeng Restaurant	amazon.com/sp?seller=A2KCV685CU17GA
199	JiShui	amazon.com/sp?seller=A50S2DYC2UA93
200	Kaguyastore	amazon.com/sp?seller=AI1F2U8G4AMU1
201	KAWAII COCO	amazon.com/sp?seller=A2W2X5JRGJJCUS

No	DEFENDANT NAME/SELLER ALIAS	MARKETPLACE URL
202	kj0jk003oo	amazon.com/sp?seller=A21PNM4MM4OZGB
203	liangshanxianxilechuangliandian	amazon.com/sp?seller=AVBWHRT0S72LN
204	longwenqubihujiedaojianzhicongxiefulian	amazon.com/sp?seller=A3T9XGAEKSSYSE
205	LS-STOP	amazon.com/sp?seller=A2AUUDMV7A0C6S
206	LuvToBuy Ltd	amazon.com/sp?seller=A13DLNJOB8ONFC
207	MargaretFPage	amazon.com/sp?seller=A34AW4SMH1NLK2
208	Mary art	amazon.com/sp?seller=A3TGJ6XEUN3X4G
209	MeikosksStore	amazon.com/sp?seller=AV1GKIAR9Q85I
210	Michaelia Esther	amazon.com/sp?seller=A2OMBWJWS2X0TO
211	NingXiangShiShanHengBaiHuoDian	amazon.com/sp?seller=A1OOQVHMZ0BM1Z
212	NingXiangShiYongKangBaiHuoDian	amazon.com/sp?seller=AQV6WWJFKEF6S
213	QUMO-US	amazon.com/sp?seller=A1EUQEJF12HZMC
214	SDFTGFSD	amazon.com/sp?seller=A1QZV7SSHQ34WZ
215	shen ying jing yong zhuang bei	amazon.com/sp?seller=A1DCM38E6UCEMQ
216	Suifenhe Zhihao Economic And Trade	amazon.com/sp?seller=A2FCRUC9ST89SI
217	SuZhouShiJiao	amazon.com/sp?seller=A20BO8WHAB2RYB
218	SWGUNG	amazon.com/sp?seller=A1028FIGN0K8KS
219	thith	amazon.com/sp?seller=A2P0HNYT5WQXAZ
220	TOKAMI	amazon.com/sp?seller=A2EGG13GHE2BLT
221	tue52738284	amazon.com/sp?seller=A2QES8ZHZ4MP08
222	ufxxxxxxxxxx	amazon.com/sp?seller=A27ZEM3FY9K9KD
223	WATERINKing	amazon.com/sp?seller=A27O7MCLYXKF1C
224	xianyangshiweichengquzouzibaihuo	amazon.com/sp?seller=A21NMKV8GTUTKP
225	XinLuoQuChunZhiWuBaiHuoDian	amazon.com/sp?seller=A285EGDESGELD2
226	XinShaoXianPingShangZhen HuXinBaiHuoDian	amazon.com/sp?seller=A3DPUZFOPCO2LH
227	xixianxinqufengdongxinchengbaiyubaihuodian	amazon.com/sp?seller=A2HFZRSDPSYFKK
228	xwbd	amazon.com/sp?seller=AY7KG1HQ2D351
229	Yi Zhitong culture media	amazon.com/sp?seller=A3OPYBOV3SORJG
230	Yongkang Yaoya Industry and Trade Co., Ltd.	amazon.com/sp?seller=A1IDTKS9B7OH9I
231	ZhiZeXin	amazon.com/sp?seller=A29P3L158ZEQE1
232	zhongziying	amazon.com/sp?seller=A393IRF4GVB5KR
233	ZJS-AB	amazon.com/sp?seller=A3T6CK1EK4TVA5
234	Zwell	amazon.com/sp?seller=A9V83XRLE4IWK
235	义乌市春易电子商务商行	amazon.com/sp?seller=AP2RUK1PJ79Z6&
236	Hanz_74	bonanza.com/booths/Hanz_74
237	NMoreG	bonanza.com/booths/NMoreG
238	PersonalizedSports	bonanza.com/booths/PersonalizedSports
239	pinunion	bonanza.com/booths/pinunion
240	Sticker_UK	bonanza.com/booths/Sticker_UK
241	wonder_zhop	bonanza.com/booths/wonder_zhop
242	1.43military	ebay.com/usr/1.43military
243	alice2507	ebay.com/usr/alice2507
244	allbysarah2014	ebay.com/usr/allbysarah2014



<b>No</b>	<b>DEFENDANT NAME/SELLER ALIAS</b>	<b>MARKETPLACE URL</b>
245	ascentechglobal	ebay.com/usr/ascentechglobal
246	aseel_market	ebay.com/usr/aseel_market
247	autoperform911	ebay.com/usr/autoperform911
248	bcinternational	ebay.com/usr/bcinternational
249	bestfriend520	ebay.com/usr/bestfriend520
250	chenlitong20188	ebay.com/usr/chenlitong20188
251	christallinchristin_0	ebay.com/usr/christallinchristin_0
252	cushion.cover.mat.store	ebay.com/usr/cushion.cover.mat.store
253	customshoponline	ebay.com/usr/customshoponline
254	dotopop12	ebay.com/usr/dotopop12
255	fatmaggotclothingco	ebay.com/usr/fatmaggotclothingco
256	foxyjjulie	ebay.com/usr/foxyjjulie
257	gadamitko	ebay.com/usr/gadamitko
258	giedrius-shop	ebay.com/usr/giedrius-shop
259	icustomgraphics	ebay.com/usr/icustomgraphics
260	jarwj0	ebay.com/usr/jarwj0
261	lei8788	ebay.com/usr/lei8788
262	morennab	ebay.com/usr/morennab
263	myace.crafts	ebay.com/usr/myace.crafts
264	pennywoof122	ebay.com/usr/pennywoof122
265	perfect_printables_uk	ebay.com/usr/perfect_printables_uk
266	rainbowhouse2015	ebay.com/usr/rainbowhouse2015
267	shirtm_0	ebay.com/usr/shirtm_0
268	shuch_57	ebay.com/usr/shuch_57
269	stay2see	ebay.com/usr/stay2see
270	stickers-world-uk	ebay.com/usr/stickers-world-uk
271	swiss-happy4you	ebay.com/usr/swiss-happy4you
272	veryverycool	ebay.com/usr/veryverycool
273	wangzhi_97	ebay.com/usr/wangzhi_97
274	gabbagabbabuttons	gabbagabbabuttons.ecrater.com
275	goya	goya.ecrater.com
276	2POINT5DSTREETWEAR	etsy.com/shop/2POINT5DSTREETWEAR
277	3GoldenMapleLeaf	etsy.com/shop/3GoldenMapleLeaf
278	Aleworldstickers	etsy.com/shop/Aleworldstickers
279	Allsorts And Fairy Dust	etsy.com/shop/AllsortsAndFairyDust
280	AMspaceCASE	etsy.com/shop/AMspaceCASE
281	AngelaMaryYoung	etsy.com/shop/AngelaMaryYoung
282	AngelLightJewels	etsy.com/shop/AngelLightJewels
283	ArabellaCraftStories	etsy.com/shop/ArabellaCraftStories
284	Artheresa	etsy.com/shop/Artheresa
285	ashandcocharms	etsy.com/shop/ashandcocharms
286	Aurorative	etsy.com/shop/Aurorative
287	BenditaKanalla	etsy.com/shop/BenditaKanalla
288	BespokeDanglers	etsy.com/shop/BespokeDanglers

<b>No</b>	<b>DEFENDANT NAME/SELLER ALIAS</b>	<b>MARKETPLACE URL</b>
289	BIDsyTreasures	etsy.com/shop/BIDsyTreasures
290	BlissPointStudio	etsy.com/shop/BlissPointStudio
291	BOMALiNE	etsy.com/shop/BOMALiNE
292	bunnyslim	etsy.com/shop/bunnyslim
293	caketeeth	etsy.com/shop/caketeeth
294	CatharsisCraftsInc	etsy.com/shop/CatharsisCraftsInc
295	Charms4YouGB	etsy.com/shop/Charms4YouGB
296	CinderellaCraftsInc	etsy.com/shop/CinderellaCraftsInc
297	Clancysmarket	etsy.com/shop/Clancysmarket
298	CloniBoutique	etsy.com/shop/CloniBoutique
299	ComplementosMolero	etsy.com/shop/ComplementosMolero
300	craftclubcafe	etsy.com/shop/craftclubcafe
301	CreationMeloenCanada	etsy.com/shop/CreationMeloenCanada
302	CrossStitchHouse	etsy.com/shop/CrossStitchHouse
303	DilMichCreations	etsy.com/shop/DilMichCreations
304	DIYLoveOcean	etsy.com/shop/DIYLoveOcean
305	DJdecals	etsy.com/shop/DJdecals
306	FabianineShop	etsy.com/shop/FabianineShop
307	FabricDesigTreasures	etsy.com/shop/FabricDesigTreasures
308	FabricforJourney	etsy.com/shop/FabricforJourney
309	Foxlow	etsy.com/shop/Foxlow
310	GoldenAgeNovelties	etsy.com/shop/GoldenAgeNovelties
311	happydeal	etsy.com/shop/happydeal
312	Hunura	etsy.com/shop/Hunura
313	JoviTaleBoutique	etsy.com/shop/JoviTaleBoutique
314	JulepeStore	etsy.com/shop/JulepeStore
315	KarameleonAustralia	etsy.com/shop/KarameleonAustralia
316	KeyoVintageGarbage	etsy.com/shop/KeyoVintageGarbage
317	LALAMBRERA	etsy.com/shop/LALAMBRERA
318	LesBijouxDesZotonis	etsy.com/shop/LesBijouxDesZotonis
319	LINLINCRAFT	etsy.com/shop/LINLINCRAFT
320	LisArtCanada	etsy.com/shop/LisArtCanada
321	Lulufabric	etsy.com/shop/lulufabric
322	Lynette Forgan	etsy.com/shop/ImpactAustralia
323	MagickalGoddess7	etsy.com/shop/MagickalGoddess7
324	MainstayBoutique	etsy.com/shop/MainstayBoutique
325	Mamachismo	etsy.com/shop/Mamachismo
326	Maskadon	etsy.com/shop/Maskadon
327	MAXIKACanada	etsy.com/shop/MAXIKACanada
328	MazinMasks	etsy.com/shop/MazinMasks
329	Mclee	etsy.com/shop/LemonTreeFabric
330	MEDIEVALPIXEL	etsy.com/shop/MEDIEVALPIXEL
331	MimiandMecraftsGoods	etsy.com/shop/MimiandMecraftsGoods
332	MISSSCLEMENTINESSHOP	etsy.com/shop/MISSSCLEMENTINESSHOP

<b>No</b>	<b>DEFENDANT NAME/SELLER ALIAS</b>	<b>MARKETPLACE URL</b>
333	MJMAD	etsy.com/shop/MJMAD
334	MomGifts	etsy.com/shop/MomGifts
335	NeedleUpCo	etsy.com/shop/NeedleUpCo
336	NerdgasmCanada	etsy.com/shop/NerdgasmCanada
337	NHCREATIV	etsy.com/shop/NHCREATIV
338	PCLjewellerystore	etsy.com/shop/PCLjewellerystore
339	Pollymop	etsy.com/shop/Pollymop
340	Quicfabrics	etsy.com/shop/Quicfabrics
341	ROUND2Crafts	etsy.com/shop/ROUND2Crafts
342	Sarnoon	etsy.com/shop/Sarnoon
343	schuco2	etsy.com/shop/schuco2
344	ScreaminDecals	etsy.com/shop/ScreaminDecals
345	sevenkeysdesigns	etsy.com/shop/sevenkeysdesigns
346	SimpleSyrupEmporium	etsy.com/shop/SimpleSyrupEmporium
347	SmokeyHoes	etsy.com/shop/SmokeyHoes
348	StardustBandana	etsy.com/shop/StardustBandana
349	StarmanApparel	etsy.com/shop/StarmanApparel
350	StickersyourLife	etsy.com/shop/StickersyourLife
351	stikaco	etsy.com/shop/stikaco
352	Stikkys	etsy.com/shop/Stikkys
353	SweetHomeCactus	etsy.com/shop/SweetHomeCactus
354	TCGCollection	etsy.com/shop/TCGCollection
355	TheCre8tiveCelt	etsy.com/shop/TheCre8tiveCelt
356	TheSewSpot	etsy.com/shop/TheSewSpot
357	TheTinyCarpenter	etsy.com/shop/TheTinyCarpenter
358	TissusForYou	etsy.com/shop/TissusForYou
359	URcase	etsy.com/shop/URcase
360	VFcreaperles	etsy.com/shop/VFcreaperles
361	WhiteOwlClothPads	etsy.com/shop/WhiteOwlClothPads
362	WilkinsonStoreArt	etsy.com/shop/WilkinsonStoreArt
363	YourShop66	etsy.com/shop/YourShop66
364	zoozotown	etsy.com/shop/zoozotown
365	Dead leaves flowers	wish.com/merchant/5f4c9717e223c5f152e5daed
366	Ericpan	wish.com/merchant/5e844c5a29e7865040fbdab3
367	FCDVJ	wish.com/merchant/5e8968f3355fe5eeb67cd9f9
368	jeewee66	wish.com/merchant/5e9be44b2405fb9e97c4a539
369	Keenclaws	wish.com/merchant/601e630df330793cb796155f
370	larair	wish.com/merchant/5f3d566d471cf20d858c4211
371	levm	wish.com/merchant/5fd1cc8b518bb71060bde425
372	Lilan921	wish.com/merchant/5e745f427f5269221ed93d82
373	Liqing800765	wish.com/merchant/6003e7361f399b1d2647956c
374	liuting10610	wish.com/merchant/6083cef5729e09df0cd779b6
375	lizhengquan76242	wish.com/merchant/6083e7d3c9659d452d03f417
376	Mc Capitalpop	wish.com/merchant/601e5f0c04e640382013daf5



No	DEFENDANT NAME/SELLER ALIAS	MARKETPLACE URL
377	qzy12345	wish.com/merchant/5f8a73bc6f8b8c00418753cd
378	ruinanpaijiao	wish.com/merchant/5ea10d186cf7c809428fd6af
379	shirtt	wish.com/merchant/6034b7f1ddca6a75277fed62
380	Tubage	wish.com/merchant/5948dd8d8b960229cfb39b24
381	weixinyu61680	wish.com/merchant/6056c5b6a86d4367a37aad00
382	yintudaolin	wish.com/merchant/5d85d43935b44925402cf3ec