

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.:

22-CV-60777-WPD/LSS

STARLA MICHELLE, LLC,

Plaintiff,

v.

THE INDIVIDUALS, PARTNERSHIPS
AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON
SCHEDULE "A",

Defendants.

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

Plaintiff STARLA MICHELLE, LLC ("SM" or "Plaintiff") by and through its undersigned counsel, brings this Complaint against Defendants, the individuals, partnerships, and unincorporated associations set forth on Schedule "A" hereto (collectively "Defendants"), who are promoting, selling, offering for sale and distributing goods bearing counterfeits and confusingly similar imitations of Plaintiff's intellectual property within this district through various Internet based e-commerce stores using the seller identities as set forth on Schedule "A" hereto (the "Seller IDs"), and in support of its claims, alleges as follows:

SUMMARY OF THE ACTION

1. Plaintiff SM brings this action for federal trademark counterfeiting and infringement, false designation of origin, common law unfair competition, and common law trademark infringement pursuant to 15 U.S.C. §§ 1114, 1116, and 1125(a), The All Writs Act, 28 U.S.C. § 1651(a), and Florida's common law.

SRIPLAW

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2. Plaintiff SM brings this action for willful copyright infringement and piracy committed for purposes of commercial advantage or private financial gain by the reproduction or distribution, including by electronic means, of one or more copies of copyrighted works in violation of 17 U.S.C. §501, and for all the remedies available under the 17 U.S.C. § 101, *et seq.*, and The All Writs Act, 28 U.S.C. § 1651(a).

SUBJECT MATTER JURISDICTION

3. This Court has original subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338.

4. This Court also has subject matter jurisdiction over this action pursuant to 15 U.S.C. § 1121 and 17 U.S.C. § 301.

5. This Court has supplemental jurisdiction pursuant to 28 U.S.C. § 1367 over the state law claims because those claims are so related to the federal claims that they form part of the same case or controversy.

PERSONAL JURISDICTION

6. Defendants are subject to personal jurisdiction in this district because they purposefully direct their activities toward and conduct business with consumers throughout the United States, including within the state of Florida and this district, through at least the internet-based e-commerce stores accessible in Florida and operating under their Seller IDs.

7. Defendants are subject to personal jurisdiction in this district because their illegal activities directed towards the state of Florida cause Plaintiff injury in Florida, and Plaintiff's claims arise out of those activities.

8. Alternatively, Defendants are subject to personal jurisdiction in this district pursuant to Federal Rule of Civil Procedure 4(k)(2) because (i) Defendants are not subject to

jurisdiction in any state's court of general jurisdiction; and (ii) exercising jurisdiction is consistent with the United States Constitution and laws.

VENUE

9. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b)(3) because Defendants are subject to the court's personal jurisdiction and not resident in the United States and therefore there is no district in which an action may otherwise be brought.

10. Venue is proper in this Court pursuant to 28 U.S.C. § 1391 since Defendants are, upon information and belief, aliens who are engaged in infringing activities and causing harm within this district by advertising, offering to sell, selling and/or shipping infringing products to consumers into this district.

11. Venue is proper in this Court pursuant to 28 U.S.C. § 1400(a) because Defendants or their agents are subject to the court's personal jurisdiction and therefore reside in this judicial district or may be found here.

THE PLAINTIFF

12. SM is a Texas Limited Liability Company with its principal place of business in Austin, Texas.

13. SM is owned by the artist Starla Michelle Halfmann. SM is Ms. Halfmann's business that licenses and sells copies of Ms. Halfmann's Works. Starla Michelle Halfmann, known professionally as Starla Michelle, is a professional artist and illustrator based in Austin, Texas. She received her Bachelor of Fine Arts Degree in Design Communications from Texas Tech University. Starla is the author and illustrator of the children's book Alphabet Kingdom (Cameron Kids, 2019). Starla's work has been featured in Anthropologie, Skyline Art Editions, and May Designs. Her art and design interests are varied but animals are a favorite theme. Each of Starla's paintings radiates a different story because she invites God to work through her art.

Starla's passion for art is what emits joy to her paint brush, making child-like wonders come to life on the canvas.

14. SM's products are sold through Amazon.com, Anthropologie.com, Carol&Frank.com, on SM's own website www.starlamichelle.com, and through other authorized retailers.

15. SM owns the trademark and copyrights described below that are the subject of this action.

16. Plaintiff offers for sale and sells its products within the state of Florida, including this district, and throughout the United States.

17. Like many other intellectual property rights owners, Plaintiff suffers ongoing daily and sustained violations of its intellectual property rights at the hands of counterfeiters and infringers, such as Defendants herein.

18. Plaintiff is harmed, the consuming public is duped and confused, and the Defendants earn substantial profits in connection with the infringing conduct.

19. In order to combat the harm caused by the combined actions of Defendants and others engaging in similar infringing conduct, Plaintiff expends significant resources in connection with its intellectual property enforcement efforts, including legal fees and investigative fees.

20. The recent explosion of infringement over the Internet has created an environment that requires companies like Plaintiff to expend significant time and money across a wide spectrum of efforts in order to protect both consumers and itself from the ill effects of infringement of Plaintiff's intellectual property rights, including consumer confusion and the erosion of Plaintiff's brand.

PLAINTIFF'S INTELLECTUAL PROPERTY RIGHTS

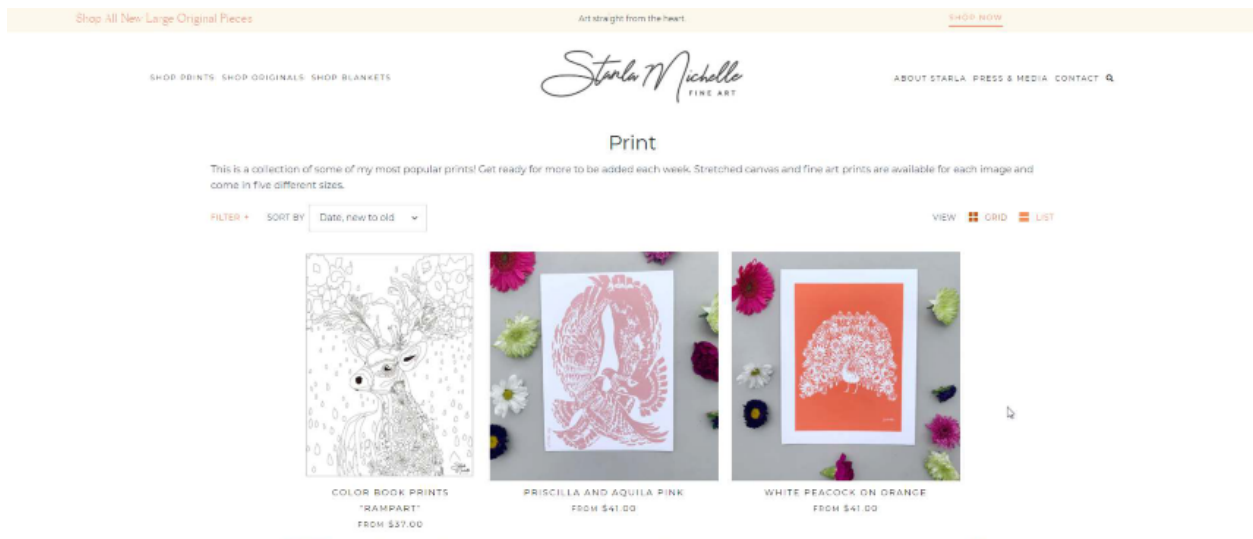
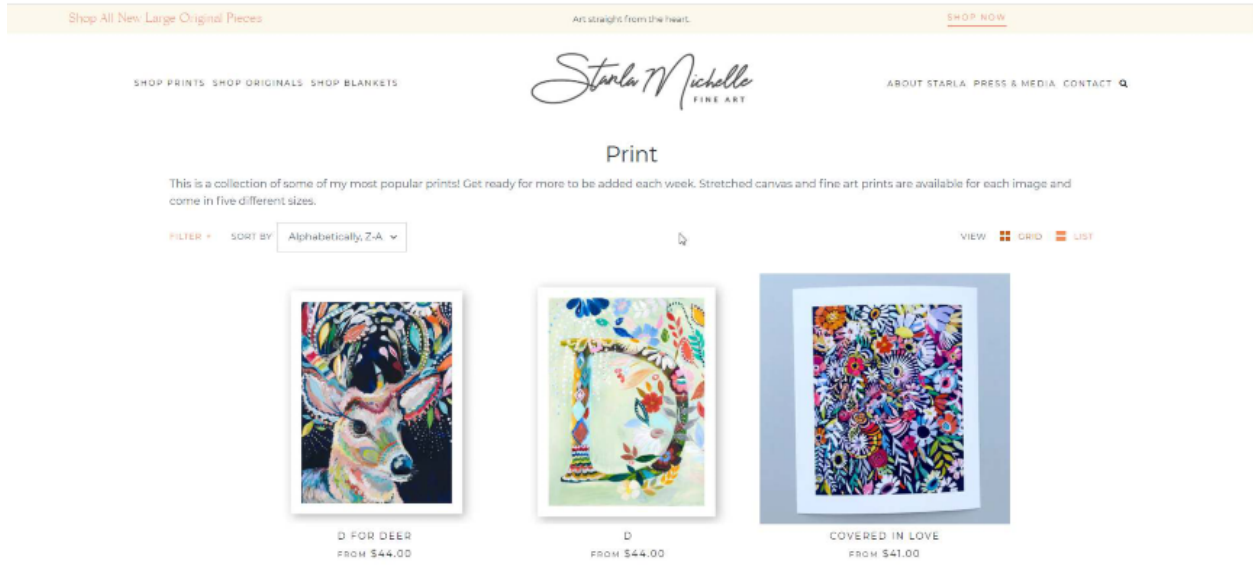
A. PLAINTIFF'S TRADEMARK RIGHTS

21. Plaintiff creates and sells products under the federally registered trademark STARLA MICHELLE.

22. Plaintiff is the owner of all rights in and to the STARLA MICHELLE Mark, U.S. Reg. No. 6,540,016 for art prints; art prints on canvas; printed art reproductions; framed art prints; graphic art prints; graphic fine art prints; printed children's coloring pages in International Class 016, registered October 26, 2021 and shown in Exhibit 1, which is valid and registered on the Principal Register of the United States Patent and Trademark Office (the "STARLA MICHELLE Mark").

23. The STARLA MICHELLE Mark consists of the wording STARLA MICHELLE in standard characters, without claim to any particular font, style, size or color. The STARLA MICHELLE Mark corresponds to the first and middle name of the professional artist Starla Michelle Halfmann, Owner and sole member of SM. The STARLA MICHELLE Mark has a strong connection with the personality of the artist Starla Michelle Halfmann and the creative Works she brings to life. The STARLA MICHELLE Mark was first used and first used in commerce in November 2008.

24. The STARLA MICHELLE Mark is used in connection with the creation, manufacture and distribution of Plaintiff's high-quality and very unique art prints and illustrations. Shown below is the STARLA MICHELLE Mark as it is used in relation with some of Plaintiff's products.



25. The STARLA MICHELLE Mark has been used in interstate commerce to identify and distinguish Plaintiff's high-quality and very unique art prints and illustrations for an extended period of time.

26. The STARLA MICHELLE Mark has been used by Plaintiff a long prior in time to Defendants' use of copies of this trademark.

27. The STARLA MICHELLE Mark has never been assigned or licensed to any of the Defendants.

28. The STARLA MICHELLE Mark is a symbol of Plaintiff's high-quality goods, reputation and goodwill and have never been abandoned.

29. Plaintiff has carefully monitored and policed the use of the STARLA MICHELLE Mark.

30. Plaintiff has expended substantial time, money and other resources developing, advertising and otherwise promoting the STARLA MICHELLE Mark.

31. Plaintiff has extensively used, advertised, and promoted the STARLA MICHELLE Mark in the United States in association with the sale of high-quality and very unique art prints and illustrations.

32. Plaintiff has spent substantial resources promoting the STARLA MICHELLE Mark and art prints and illustrations bearing or sold under the STARLA MICHELLE Mark.

33. As a result of Plaintiff's efforts, members of the consuming public readily identify merchandise bearing or sold under the STARLA MICHELLE Mark as being high-quality and very unique art prints and illustrations sponsored and approved by Plaintiff.

34. Accordingly, the STARLA MICHELLE Mark has achieved secondary meaning as identifiers of high-quality and very unique art prints and illustrations.

35. Genuine goods bearing or sold under the STARLA MICHELLE Mark are widely legitimately advertised and promoted by Plaintiff, its authorized distributors, and unrelated third parties via the Internet.

36. Visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing, has become increasingly important to Plaintiff's overall marketing and consumer education efforts.

37. Thus, Plaintiff expends significant monetary resources on Internet marketing and consumer education, including search engine optimization ("SEO") strategies.

38. Plaintiff's SEO strategies allow Plaintiff and its authorized retailers to fairly and legitimately educate consumers about the value associated with Plaintiff's products and the goods marked with the STARLA MICHELLE Mark.

B. PLAINTIFF'S COPYRIGHT RIGHTS

39. Plaintiff's STARLA MICHELLE branded art prints and illustrations consist, represent, and hold the Works from the professional artist Starla Michelle Halfmann, protected by copyright, and registered with the Copyright Office (the "Works").

40. Plaintiff's Works are duly registered with the Register of Copyrights as two-dimensional artworks and illustrations as shown in the table below. True and correct copies of Copyrights Certificates of Registration and the Works they apply to are attached hereto as Exhibit 2.

Copyright Title	Registration Number	Registration Date
Rampart	VA 2-057-058	03/10/2016
R for Raccoon	VA 2-057-059	03/10/2016
C for Cow	VA 2-057-061	03/10/2016
Alphabet Kingdom	VA 2-190-295	10/14/2019

41. SM is the owner of the Works listed above by written assignment.

42. Art prints and illustrations embodying the Works are widely legitimately advertised and promoted by Plaintiff and its authorized distributors under the STARLA MICHELLE Mark.

43. Plaintiff has never granted authorization to anyone to use, advertise, market, or promote unauthorized goods using Plaintiff's copyrighted Works.

DEFENDANTS

44. Defendants have the capacity to be sued pursuant to Federal Rule of Civil Procedure 17(b).

45. Defendants are individuals and/or business entities of unknown makeup, each of whom, upon information and belief, either reside and/or operate in foreign jurisdictions, redistribute products from the same or similar sources in those locations, and/or ship their goods from the same or similar sources in those locations to shipping and fulfillment centers within the United States to redistribute their products from those locations.

46. Defendants are engaged in business in Florida but have not appointed an agent for service of process.

47. Upon information and belief, Defendants have registered, established or purchased, and maintained their Seller IDs.

48. Defendants target their business activities toward consumers throughout the United States, including within this district, through the simultaneous operation of commercial Internet based e-commerce stores via the Internet marketplace websites under the Seller IDs.

49. Defendants are the past and present controlling forces behind the sale of products bearing counterfeits and infringements of Plaintiff's intellectual property rights as described herein operating and using at least the Seller IDs.

50. Defendants directly engage in unfair competition with Plaintiff by advertising, offering for sale, and selling goods bearing counterfeits and infringements of Plaintiff's intellectual property rights to consumers within the United States and this district through Internet based e-commerce stores using, at least, the Seller IDs and additional names, websites, or seller identification aliases not yet known to Plaintiff.

51. Defendants have purposefully directed some portion of their illegal activities towards consumers in the state of Florida through the advertisement, offer to sell, sale, and/or shipment of counterfeit and infringing goods into the State.

52. Upon information and belief, Defendants have engaged in fraudulent conduct with respect to the registration of the Seller IDs by providing false and/or misleading information to the Internet based e-commerce platforms or domain registrar where they offer to sell and/or sell during the registration or maintenance process related to their respective Seller IDs.

53. Upon information and belief, many Defendants registered and maintained their Seller IDs for the sole purpose of engaging in illegal counterfeiting activities.

54. Upon information and belief, Defendants will likely continue to register or acquire new seller identification aliases for the purpose of selling and offering for sale counterfeits and infringements of Plaintiff's intellectual property rights unless preliminarily and permanently enjoined.

55. Defendants use their Internet-based businesses to infringe the intellectual property rights of Plaintiff and others.

56. Defendants' business names, i.e., the Seller IDs, associated payment accounts, and any other alias seller identification names or e-commerce stores used in connection with the sale of counterfeits and infringements of Plaintiff's intellectual property rights are essential

components of Defendants' online activities and are one of the means by which Defendants further their counterfeiting and infringement scheme and cause harm to Plaintiff.

57. Defendants are using counterfeits and infringements of Plaintiff's intellectual property rights to drive Internet consumer traffic to their e-commerce stores operating under the Seller IDs, thereby increasing the value of the Seller IDs and decreasing the size and value of Plaintiff's legitimate marketplace and intellectual property rights at Plaintiff's expense.

58. Defendants, through the sale and offer to sell counterfeit and infringing products, are directly, and unfairly, competing with Plaintiff's economic interests in the state of Florida and causing Plaintiff harm and damage within this jurisdiction.

59. The natural and intended byproduct of Defendants' actions is the erosion and destruction of the goodwill associated with Plaintiff's intellectual property rights and the destruction of the legitimate market sector in which it operates.

60. Upon information and belief, at all times relevant hereto, Defendants had actual or constructive knowledge of Plaintiff's intellectual property rights, including Plaintiff's exclusive right to use and license such intellectual property rights.

DEFENDANTS' INFRINGING ACTIVITIES

61. Defendants are promoting, advertising, distributing, selling, and/or offering for sale cheap copies of Plaintiff's art prints and illustrations in interstate commerce that are counterfeits and infringements of Plaintiff's intellectual property rights (the "Counterfeit Goods") through at least the Internet based e-commerce stores operating under the Seller IDs.

62. Defendants are using the STARLA MICHELLE Mark to initially attract online customers and drive them to Defendants' e-commerce stores operating under the Seller IDs.

63. Defendants are using identical copies of the STARLA MICHELLE Mark for different quality goods.

64. Plaintiff has used the STARLA MICHELLE Mark extensively and continuously before Defendants began offering counterfeit and confusingly similar imitations of Plaintiff's merchandise.

65. Upon information and belief, Defendants' Counterfeit Goods are of a quality substantially different than that of Plaintiff's genuine goods.

66. Defendants are actively using, promoting and otherwise advertising, distributing, selling and/or offering for sale substantial quantities of their Counterfeit Goods with the knowledge and intent that such goods will be mistaken for the genuine high-quality goods offered for sale by Plaintiff, despite Defendants' knowledge that they are without authority to use the STARLA MICHELLE Mark. Defendant's counterfeit and confusingly similar imitations of Plaintiff's art prints and illustrations reproduce all the elements of Plaintiff's copyrighted Works, including the STARLA MICHELLE Mark.

67. The net effect of Defendants' actions is likely to cause confusion to consumers, at the time of initial interest, sale, and in the post-sale setting, who will believe Defendants' goods offered for sale on Defendants' e-commerce stores are genuine goods originating from, associated with, and approved by Plaintiff.

68. Defendants advertise their e-commerce stores, including their Counterfeit Goods offered for sale, to the consuming public via e-commerce stores on, at least, one Internet marketplace website operating under, at least, the Seller IDs.

69. In so advertising their stores and products, Defendants improperly and unlawfully use the STARLA MICHELLE Mark without Plaintiff's permission.

70. As part of their overall infringement and counterfeiting scheme, most Defendants are, upon information and belief, concurrently employing and benefitting from substantially

similar, advertising and marketing strategies based, in large measure, upon an illegal use of counterfeits and infringements of the STARLA MICHELLE Mark.

71. Specifically, Defendants are using counterfeits and infringements of the STARLA MICHELLE Mark in order to make their e-commerce stores selling illegal goods appear more relevant and attractive to consumers searching for both Plaintiff's goods and goods sold by Plaintiff's competitors online.

72. By their actions, Defendants are contributing to the creation and maintenance of an illegal marketplace operating in parallel to the legitimate marketplace for Plaintiff's genuine goods.

73. Defendants are causing individual, concurrent and indivisible harm to Plaintiff and the consuming public by (i) depriving Plaintiff and other third parties of their right to fairly compete for space within search engine results and reducing the visibility of Plaintiff's genuine goods on the World Wide Web, (ii) causing an overall degradation of the value of the goodwill associated with the STARLA MICHELLE Mark, and (iii) increasing Plaintiff's overall cost to market its goods and educate consumers via the Internet.

74. Defendants are concurrently conducting and targeting their counterfeiting and infringing activities toward consumers and likely causing unified harm within this district and elsewhere throughout the United States.

75. As a result, Defendants are defrauding Plaintiff and the consuming public for Defendants' own benefit.

76. Upon information and belief, at all times relevant hereto, Defendants in this action had full knowledge of Plaintiff's ownership of the STARLA MICHELLE Mark, including its

exclusive right to use and license such intellectual property and the goodwill associated therewith.

77. Defendants' use of the STARLA MICHELLE Mark, including the promotion and advertisement, reproduction, distribution, sale and offering for sale of their Counterfeit Goods, is without Plaintiff's consent or authorization.

78. Defendants are engaging in the above-described illegal counterfeiting and infringing activities knowingly and intentionally or with reckless disregard or willful blindness to Plaintiff's rights for the purpose of trading on Plaintiff's goodwill and reputation.

79. If Defendants' intentional counterfeiting and infringing activities are not preliminarily and permanently enjoined by this Court, Plaintiff and the consuming public will continue to be harmed.

80. Defendants' infringing activities are likely to cause confusion, deception, and mistake in the minds of consumers before, during and after the time of purchase.

81. Defendants' wrongful conduct is likely to create a false impression and deceive customers, the public, and the trade into believing there is a connection or association between Plaintiff's genuine goods and Defendants' Counterfeit Goods, which there is not.

82. Defendants' payment and financial accounts connected to their marketplace seller accounts, are being used by Defendants to accept, receive, and deposit profits from Defendants' counterfeiting, infringing, and unfairly competitive activities connected to their Seller IDs and any other alias e-commerce stores or seller identification names being used and/or controlled by them.

83. Defendants are likely to transfer or secret their assets to avoid payment of any monetary judgment awarded to Plaintiff.

84. Plaintiff is suffering irreparable injury and has suffered substantial damages as a result of Defendants' unauthorized and infringing activities and their wrongful use of Plaintiff's intellectual property rights.

85. If Defendants' counterfeiting, infringing, and unfairly competitive activities are not preliminarily and permanently enjoined by this Court, Plaintiff and the consuming public will continue to be harmed.

86. The harm and damages sustained by Plaintiff have been directly and proximately caused by Defendants' wrongful reproduction, use, advertisement, promotion, offers to sell, and sale of their Counterfeit Goods.

87. Defendants have sold their infringing products in competition directly with Plaintiff's genuine products.

88. Plaintiff should not have any competition from Defendants because Plaintiff never authorize Defendants to use Plaintiff's trademark and copyrights.

89. Plaintiff has no adequate remedy at law.

COUNT I – TRADEMARK INFRINGEMENT (15 U.S.C. § 1114)

90. Plaintiff incorporates the allegations of paragraphs 1 through 89 of this Complaint as if fully set forth herein.

91. This is an action for trademark counterfeiting and infringement against Defendants based on their use of counterfeit and confusingly similar imitations of the STARLA MICHELLE Mark in commerce in connection with the promotion, advertisement, distribution, offering for sale and sale of the Counterfeit Goods.

92. Defendants are promoting and otherwise advertising, selling, offering for sale, and distributing goods bearing and/or using counterfeits and/or infringements of the STARLA MICHELLE Mark.

93. Defendants are continuously infringing and inducing others to infringe the STARLA MICHELLE Mark by using it to advertise, promote, sell, and offer to sell counterfeit and infringing goods.

94. Defendants' concurrent counterfeiting and infringing activities are likely to cause and actually are causing confusion, mistake, and deception among members of the trade and the general consuming public as to the origin and quality of Defendants' Counterfeit Goods.

95. Defendants' unlawful actions have caused and are continuing to cause unquantifiable damages to Plaintiff and are unjustly enriching Defendants with profits at Plaintiff's expense.

96. Defendants' above-described illegal actions constitute counterfeiting and infringement of the STARLA MICHELLE Mark in violation of Plaintiff's rights under § 32 of the Lanham Act, 15 U.S.C. § 1114.

97. Plaintiff has suffered and will continue to suffer irreparable injury and damages due to Defendants' above-described activities if Defendants are not preliminarily and permanently enjoined.

98. If not preliminarily and permanently enjoined, Defendants will continue to wrongfully profit from their illegal activities.

COUNT II – FALSE DESIGNATION OF ORIGIN (15 U.S.C. § 1125(a))

99. Plaintiff incorporates the allegations of paragraphs 1 through 89 of this Complaint as if fully set forth herein.

100. Upon information and belief, Defendants' Counterfeit Goods bearing, offered for sale and sold using copies of the STARLA MICHELLE Mark have been widely advertised and offered for sale throughout the United States via at least one Internet marketplace website.

101. Defendants' Counterfeit Goods bearing, offered for sale, and sold using copies of the STARLA MICHELLE Mark are virtually identical in appearance to Plaintiff's genuine goods.

102. Defendants' Counterfeit Goods are different in quality from Plaintiff's goods, and are of much lower quality.

103. Defendants' activities are likely to cause confusion in the trade and among the general public as to at least the origin or sponsorship of their Counterfeit Goods.

104. Defendants, upon information and belief, have used in connection with their advertisement, offer for sale, and sale of their Counterfeit Goods, false designations of origin and false descriptions and representations, including words or other symbols and trade dress, which tend to falsely describe or represent such goods and have caused such goods to enter into commerce with full knowledge of the falsity of such designations of origin and such descriptions and representations, all to Plaintiff's detriment.

105. Defendants have authorized infringing uses of the STARLA MICHELLE Mark in Defendants' advertisement and promotion of their counterfeit and infringing branded goods.

106. Defendants have misrepresented to members of the consuming public that the Counterfeit Goods being advertised and sold by them are genuine, non-infringing goods.

107. Defendants are using counterfeits and infringements of the STARLA MICHELLE Mark in order to unfairly compete with Plaintiff and others for space within organic search engine results and social media results, thereby jointly depriving Plaintiff of a valuable marketing and educational tool which would otherwise be available to Plaintiff and reducing the visibility of Plaintiff's genuine goods on the internet and across social media platforms.

108. Defendants' above-described actions are in violation of Section 43(a) of the Lanham Act, 15 U.S.C. §1125(a).

109. Plaintiff has no adequate remedy at law and have sustained indivisible injury and damage caused by Defendants' concurrent conduct.

110. Absent an entry of an injunction by this Court, Defendants will continue to wrongfully reap profits and Plaintiff will continue to suffer irreparable injury to its goodwill and business reputation, as well as monetary damages.

COUNT III – COMMON LAW UNFAIR COMPETITION

111. Plaintiff incorporates the allegations of paragraphs 1 through 89 of this Complaint as if fully set forth herein.

112. This is an action against Defendants based on their promotion, advertisement, distribution, sale and/or offering for sale of goods bearing marks that are virtually identical to the STARLA MICHELLE Mark in violation of Florida's common law of unfair competition.

113. Defendants' activities complained of herein constitute unfair methods of competition.

114. Specifically, Defendants are promoting and otherwise advertising, selling, offering for sale and distributing goods using or bearing counterfeits and infringements of the STARLA MICHELLE Mark.

115. Defendants are also using counterfeits and infringements of the STARLA MICHELLE Mark to unfairly compete with Plaintiff and others for (1) space in search engine and social media results across an array of search terms and (2) visibility on the Internet.

116. Defendants' infringing activities are likely to cause and actually are causing confusion, mistake and deception among members of the trade and the general consuming public

as to the origin and quality of Defendants' e-commerce stores as a whole and all products sold therein by their use of the STARLA MICHELLE Mark.

117. Plaintiff has no adequate remedy at law and is suffering irreparable injury and damages as a result of Defendants' actions.

COUNT IV – COMMON LAW TRADEMARK INFRINGEMENT

118. Plaintiff incorporates the allegations of paragraphs 1 through 89 of this Complaint as if fully set forth herein.

119. This is an action for common law trademark infringement against Defendants based on their promotion, advertisement, offering for sale, and sale of their Counterfeit Goods bearing the STARLA MICHELLE Mark.

120. Plaintiff is the owner of all common law rights in and to the STARLA MICHELLE Mark.

121. Defendants, upon information and belief, are promoting, and otherwise advertising, distributing, offering for sale, and selling goods bearing infringements of the STARLA MICHELLE Mark.

122. Defendants' infringing activities are likely to cause and actually are causing confusion, mistake and deception among members of the trade and the general consuming public as to the origin and quality of Defendants' Counterfeit Goods bearing the STARLA MICHELLE Mark.

123. Plaintiff has no adequate remedy at law and is suffering damages and irreparable injury as a result of Defendants' actions.

COUNT V – COPYRIGHT INFRINGEMENT

124. Plaintiff incorporates the allegations of paragraphs 1 through 89 of this Complaint as if fully set forth herein.

125. Plaintiff has complied in all respects with the Copyright Act of the United States and all other laws governing copyright and secured the exclusive rights and privileges in and to the copyrights at issue in this action.

126. Pursuant to 17 U.S.C. § 411 (a), Plaintiff registered its copyrights for its Works.

127. Defendants directly infringed one or more of Plaintiff's exclusive rights in its copyright registered Works under 17 U.S.C. § 106.

128. Defendants copied, displayed, and distributed Plaintiff's copyrighted Works and/or prepared derivative works based upon Plaintiff's copyrighted Works in violation of Plaintiff's exclusive rights under 17 U.S.C. §106(1), (2) and/or (5).

129. Defendants' conduct constitutes willful and direct copyright infringement of Plaintiff's copyrighted Works.

130. Defendants profited from the direct infringement of the exclusive rights of Plaintiff in the Works at issue in this case under the Copyright Act.

131. Defendants' infringement is not limited to the copyright infringement listed above. Plaintiff will identify such additional infringement after discovery.

132. On information and belief, there is a business practice of infringement by Defendants.

133. On information and belief, Defendants routinely and intentionally infringe the intellectual property rights of others, including but not limited to, acting with willful blindness and/or reckless disregard.

134. Plaintiff has been damaged by the infringement.

135. The harm to Plaintiff is irreparable.

136. Plaintiff is entitled to temporary and permanent injunctive relief from Defendants' willful infringement.

137. Plaintiff is entitled to recover its actual damages and/or statutory damages, at its election.

138. Plaintiff is entitled to recover its reasonable costs and attorneys' fees incurred in this action.

WHEREFORE, Plaintiff demands judgment on all Counts of this Complaint and an award of equitable relief and monetary relief against Defendants as follows:

- a. Entry of temporary, preliminary, and permanent injunctions pursuant to 15 U.S.C. § 1116 and Federal Rule of Civil Procedure 65 enjoining Defendants, their agents, representatives, servants, employees, and all those acting in concert or participation therewith, from manufacturing or causing to be manufactured, importing, advertising or promoting, distributing, selling or offering to sell their Counterfeit Goods that infringe on Plaintiff's rights under trademark and copyright; from infringing, counterfeiting, or diluting the STARLA MICHELLE Mark; from using the STARLA MICHELLE Mark, or any mark or design similar thereto, in connection with the sale of any unauthorized goods; from using any logo, trade name or trademark or design that may be calculated to falsely advertise the services or goods of Defendants as being sponsored by, authorized by, endorsed by, or in any way associated with Plaintiff; from falsely representing themselves as being connected with Plaintiff, through sponsorship or association, or engaging in any act that is likely to falsely

cause members of the trade and/or of the purchasing public to believe any goods or services of Defendants, are in any way endorsed by, approved by, and/or associated with Plaintiff; from using any reproduction, counterfeit, infringement, copy, or colorable imitation of the STARLA MICHELLE Mark in connection with the publicity, promotion, sale, or advertising of any goods sold by Defendants; from affixing, applying, annexing or using in connection with the sale of any goods, a false description or representation, including words or other symbols tending to falsely describe or represent Defendants' goods as being those of Plaintiff, or in any way endorsed by Plaintiff and from offering such goods in commerce; from engaging in search engine optimization strategies using colorable imitations of Plaintiff's name or trademarks and from otherwise unfairly competing with Plaintiff; from copying, displaying, distributing or creating derivative works of Plaintiff's registered copyrights.

- b. Entry of a Temporary Restraining Order, as well as preliminary and permanent injunctions pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, enjoining Defendants and all third parties with actual notice of the injunction issued by this Court from participating in, including providing financial services, technical services or other support to, Defendants in connection with the sale and distribution of non-genuine goods bearing and/or using counterfeits of the STARLA MICHELLE Mark, that copy, display, distribute or use derivative works of Plaintiff's registered copyrights.

- c. Entry of an order authorizing seizure, impoundment and/or destruction of all of the products used to perpetrate the infringing acts pursuant to 17 U.S.C. §503.
- d. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority that, upon Plaintiff's request, the applicable governing Internet marketplace website operators and/or administrators for the Seller IDs who are provided with notice of an injunction issued by this Court disable and/or cease facilitating access to the Seller IDs and any other alias seller identification names being used and/or controlled by Defendants to engage in the business of marketing, offering to sell, and/or selling goods bearing counterfeits and infringements of the STARLA MICHELLE Mark.
- e. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and this Court's inherent authority that, upon Plaintiff's request, any messaging service and Internet marketplace website operators, administrators, registrar and/or top level domain (TLD) registry for the Seller IDs who are provided with notice of an injunction issued by this Court identify any e-mail address known to be associated with Defendants' respective Seller IDs.
- f. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and this Court's inherent authority that upon Plaintiff's request, any Internet marketplace website operators and/or administrators who are provided with notice of an injunction issued by this Court permanently remove from

the multiple platforms, which include, *inter alia*, a Direct platform, Group platform, Seller Product Management platform, Vendor Product Management platform, and Brand Registry platform, any and all listings and associated images of goods bearing or using counterfeits and/or infringements of the STARLA MICHELLE Mark via the e-commerce stores operating under the Seller IDs, including but not limited to the listings and associated images identified by the “parent” and/or “child” Amazon Standard Identification Numbers (“ASIN”) on Schedule “A” annexed hereto, and upon Plaintiff’s request, any other listings and images of goods bearing or using counterfeits and/or infringements of the STARLA MICHELLE Mark associated with any ASIN linked to the same sellers or linked to any other alias seller identification names being used and/or controlled by Defendants to promote, offer for sale and/or sell goods bearing and/or using counterfeits and/or infringements of the STARLA MICHELLE Mark.

- g. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act and this Court’s inherent authority that, upon Plaintiff’s request, Defendants and any Internet marketplace website operators and/or administrators who are provided with notice of an injunction issued by this Court immediately cease fulfillment of and sequester all goods of each Defendant bearing or using the STARLA MICHELLE Mark in its inventory, possession, custody, or control, turn over documents reflecting the total number of infringing goods manufactured, distributed, sold and still remaining in

inventory including, but not limited to, production reports, shipping invoices, bills of lading, sales invoices, and inventory-on-hand reports, and surrender those goods to Plaintiff.

- h. Entry of an Order requiring Defendants to correct any erroneous impression the consuming public may have derived concerning the nature, characteristics, or qualities of their products, including without limitation, the placement of corrective advertising and providing written notice to the public.
- i. Entry of an Order requiring Defendants to account to and pay Plaintiff for all profits and damages resulting from Defendants' trademark counterfeiting and infringing and unfairly competitive activities and that the award to Plaintiff be trebled, as provided for under 15 U.S.C. § 1117, or, at Plaintiff's election with respect to Count I, that Plaintiff be awarded statutory damages from each Defendant in the amount of two million dollars (\$2,000,000.00) per each counterfeit trademark used and product sold, as provided by 15 U.S.C. § 1117(c)(2) of the Lanham Act.
- j. Entry of an Order requiring Defendants to account to and pay Plaintiff for all profits and damages resulting from Defendants' copyright infringement, or statutory damages (at Plaintiff's election), for all infringements involved in the action, with respect to any one work, for which any one defendant is liable individually, or for which Defendants are liable jointly and severally with another, in a sum of not less than \$750 or more than \$30,000 as the Court considers just pursuant to 17 U.S.C.

§504(c)(1), or to the extent the Court finds that infringement was committed willfully, an award of statutory damages to a sum of not more than \$150,000 per violation, pursuant to 17 U.S.C. §504(c)(2).

- k. Entry of an award pursuant to 15 U.S.C. § 1117 (a) and (b), and 17 U.S.C. § 505 of Plaintiff's costs and reasonable attorneys' fees and investigative fees, associated with bringing this action, including the cost of corrective advertising.
- l. Entry of an Order that, upon Plaintiff's request, Defendants and any financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, and their related companies and affiliates, identify and restrain all funds, up to and including the total amount of judgment, in all financial accounts and/or sub-accounts used in connection with the Seller IDs, or other alias seller identification or e-commerce store names used by Defendants presently or in the future, as well as any other related accounts of the same customer(s) and any other accounts which transfer funds into the same financial institution account(s) and remain restrained until such funds are surrendered to Plaintiff in partial satisfaction of the monetary judgment entered herein.
- m. Entry of an award of pre-judgment interest on the judgment amount.
- n. Entry of an Order for any further relief as the Court may deem just and proper.

DATED: April 19, 2022

Respectfully submitted,

/s/ Joel B. Rothman

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Schedule "A"

DOE #	Marketplace	Seller Name	Seller ID
1	Alibaba	Guangde Guangyun Hardware Products Co., Ltd.	ahguangyun
2	Alibaba	Jinhua Hongya Crafts Co., Ltd.	art4you
3	Alibaba	Artists Art (shenzhen) Soft Art Craft Ltd.	artistsart
4	Alibaba	Shenzhen Xinsichuang Arts And Crafts Co., Ltd	bcarts
5	Alibaba	Ningde Dingze Electronic Commerce Co., Ltd.	chenistory
6	Alibaba	Yiwu Caisi Handicraft Co., Ltd.	cn1517798573nxjg
7	Alibaba	Ningbo A.ni Import Export Co., Ltd.	cnnbani
8	Alibaba	Xiamen Poly Industry And Trade Co., Ltd.	craftsdana
9	Alibaba	Yiwu Cunzhen Trading Co., Ltd.	cunzhentrade
10	Alibaba	Harbin Jinou Electronic Commerce Co., Ltd.	deal1030
11	Alibaba	Yiwu Dingxin E-Commerce Co.,Ltd.	dingxin1
12	Alibaba	Anhui Promise Arts & Crafts Co., Ltd.	dplike
13	Alibaba	Dongyang Kunpeng Painting Industry Co., Ltd.	dykp
14	Alibaba	Dongyang Pinzhi Arts& Crafts Co., Ltd.	dypz
15	Alibaba	Dongyang Sc Art & Crafts Co., Ltd.	dysichuang
16	Alibaba	Dongguan Baiken Household Products Co., Ltd.	esylife
17	Alibaba	Hangzhou Monkey And His Little Partner Trading Co Ltd.	hangzhouhouzi
18	Alibaba	Shenzhen Xinsichuang Arts And Crafts Co., Ltd.	haoart123
19	Alibaba	Dongguan Hongfa Woods Co., Ltd.	hfwoods
20	Alibaba	Yiwu Huamiao Home Supplies Co., Ltd.	huamiaochna
21	Alibaba	Jinhua Xihong Decoration Trading Co., Ltd.	jhxihongshi
22	Alibaba	Zhuji Jinsen Arts And Crafts Co., Ltd.	jinsenarts
23	Alibaba	Yiwu Juzhe Trading Co., Ltd.	juzegift
24	Alibaba	Yiwu Meian Arts & Crafts Co., Ltd.	meiancraft
25	Alibaba	Nanjing New Trend Technology Co., Ltd.	njnewtrendtechnology
26	Alibaba	Yiwu O-Choice Import And Export Co., Ltd.	o-choice
27	Alibaba	Jiangsu Pinxi Trade Co., Ltd.	pingxishangmao
28	Alibaba	Pujiang Mingjiu E-Commerce Co., Ltd.	pjmingjiu
29	Alibaba	Yiwu Seqiao Painting Industry Co., Ltd.	seqiao
30	Alibaba	Xiamen Sheng Er Wei Ying E-Commerce Co., Ltd.	shengerweiyang
31	Alibaba	Shenzhen Topurui Technology Co., Ltd.	toprearcrafts
32	Alibaba	NANJING TRUEJOIN INTERNATIONAL TRADING CO., LTD	truejoin
33	Alibaba	Shenzhen SOA Arts Co., Ltd.	u2-art
34	Alibaba	Xiamen Yinglimei Import&Export Co., Ltd.	xmylm
35	Alibaba	Shenzhen Yingsa Arts And Crafts Co., Ltd	yingsaart
36	Alibaba	Yiwu Yuhui Imp & Exp Co., Ltd.	yiwuyuhui

37	Alibaba	Yiwu Xingtao Arts And Crafts Co., Ltd.	ywxingtao
38	Aliexpress	RUOPOTY Official Store	2542023
39	Aliexpress	My beautiful life Store	3870065
40	Aliexpress	Yioop Official Store	4059068
41	Aliexpress	SDOYUNO Artwork Store	4397042
42	Aliexpress	Warm House Life Store	4643038
43	Aliexpress	AZQSD Handicrafts Store	5054223
44	Aliexpress	ARTDOT Store	5066169
45	Aliexpress	huacan Painting By Numbers Store	5232053
46	Aliexpress	GATYZTORY Factory Store	5248194
47	Aliexpress	The goddess of luck Store	5254075
48	Aliexpress	Colorful Art Store	5262194
49	Aliexpress	Hi ioostar Store	5361179
50	Aliexpress	Diamonds Paintings Factory Store	5377222
51	Aliexpress	Shop5440326 Store	5440326
52	Aliexpress	Panta Store	5689009
53	Aliexpress	DOTZSO Store	5877186
54	Aliexpress	DOHAWIZS Official Store	900252269
55	Aliexpress	MomoArt Factory Store	910908043
56	Aliexpress	Shop911025004 Store	911025004
57	Aliexpress	U-one Store	911259296
58	Aliexpress	Luoluo07 art Store	911663243
59	Aliexpress	CXY Art Life Store	911777878
60	Aliexpress	Modern-Art Store	911943818
61	Aliexpress	MY Art Decor Painting Store	911978072
62	Aliexpress	Decoration Artwork Store	912327122
63	Amazon	CHENZZZ	A11FU1GR8C9UOP
64	Amazon	SUMAIDE EU	A12JQUBNB2GSIG
65	Amazon	Dashoo	A138NBK4D0176M
66	Amazon	WYSHANGMAO	A16LTWXJHTYEYU
67	Amazon	aabbyee	A177JK8NE38JBV
68	Amazon	Just A Shop	A18NM89J6728KS
69	Amazon	weixuanbaohuo	A18RVV4TGNJNBX
70	Amazon	YSZAW-US	A19GVRM9NCNWYO
71	Amazon	FDB FACTORY	A19JUPMF58LEH0
72	Amazon	Jasonys UK	A19ZSEZAZT1NRY
73	Amazon	pingdingshanhengdeyuanshiyeyouxiangongsi	A1A1ZL82L606GQ
74	Amazon	Mini Office Depot	A1AOTXZVU6XRSO
75	Amazon	Troer	A1CPQ81HCBLHES

76	Amazon	feimaiuk	A1DWJMM0A4B3V1
77	Amazon	SeeWK	A1EHC9O5LIJMLV
78	Amazon	supercent-jp	A1EP9PDO7S9ICV
79	Amazon	ME1Y1FAN	A1GOX6LQ4OYV9D
80	Amazon	Homokea Design	A1IQS073UPPBXQ
81	Amazon	Faluckyy	A1IUC98J8XS30Q
82	Amazon	SKRYUIE	A1IXOPLFE0K6U8
83	Amazon	douyaa	A1KN9FB7ECXMLN
84	Amazon	chenxiaochi	A1LMFZFL5VFNJB
85	Amazon	huipen network	A1NNO1BKA6ZQ4Y
86	Amazon	Diymood	A1QR4B8LRJH4K5
87	Amazon	FYCERT	A1RQ24EY7HRKGY
88	Amazon	YilongCD	A1S61OFASMJSOL
89	Amazon	HuEr	A1SI2OJTHM5MQ4
90	Amazon	BaoFengXianSanShangZhuangShiJingYingGongZuoShi	A1SIM9BZXQR4ML
91	Amazon	GONGGU EU	A1UAFN0QUA69YB
92	Amazon	Fuchen	A1V1AD6BKDP08U
93	Amazon	MoryOddy	A1VVQL2OU7RHB1
94	Amazon	jklsajeyw	A1VYZUF7KGEHPX
95	Amazon	YXQSED Factory Store	A1WAY7HTRZHF16
96	Amazon	DecalMile	A1WZKRMFM2064S
97	Amazon	Cuteadorns	A1Z9F6Y9XP3USZ
98	Amazon	Homtop	A20P173XRX5L4R
99	Amazon	Esake	A21UJD36LBMTMF
100	Amazon	BAISITE-EUR	A224EHM6JIUZL8
101	Amazon	Vxkbiixcs	A23EXTMAQLSZ5V
102	Amazon	haoliushangmao	A24338CL794MJM
103	Amazon	XINRANFF	A25E64OVAUVSSF
104	Amazon	changtangxingsm	A25S2NOVOOKWSJ
105	Amazon	HEZIMO	A264RH469R09Q8
106	Amazon	ShanXiQingYiSeShangMao Co.,Ltd.	A27XFJ773EZKPS
107	Amazon	jiuchang	A28USLZPOEWXWJ
108	Amazon	HVEST Decoration Art	A29LKM9O6L5NT3
109	Amazon	sihuishichufangqingriyongpindian	A2A5AMQJN8GBJS
110	Amazon	Superior Gallery JP	A2ABIH2U7Q0S7L
111	Amazon	kaieteur	A2CMUIJODR6BAM
112	Amazon	NOWITZKI	A2D5VJCJU0EOVN
113	Amazon	AMZCHUNLIANDIAN	A2DDI6920P3WB4
114	Amazon	ROLEES DIRECT	A2DH3M7YS0X5P

115	Amazon	LIUDAO Store	A2GJQ1U0DZUXIX
116	Amazon	Fisher Potassium	A2GQCA94XQGAQL
117	Amazon	Gniosbao	A2IAR8TFWUOW7J
118	Amazon	ShenZhenYouJia	A2JXW2UVA73VZO
119	Amazon	JOJO01	A2KY7CG3R7YBWW
120	Amazon	BenaiD	A2L0KMO6E8P9NH
121	Amazon	ChroshoeEU	A2LYE4OWF1KF7Y
122	Amazon	Alycwint EU	A2MEUDS5ZEQIVH
123	Amazon	yirenge	A2NZIEI9N2G8RA
124	Amazon	Hoteck.UK.Store	A2S7QK0AAV61MQ
125	Amazon	WATAKA EU	A2SEXQIGI982J3
126	Amazon	MoMo Art	A2SW6J6ISUI9W7
127	Amazon	xajra	A2VEJZ648ZPHXA
128	Amazon	LAYEEMO-US	A2WB72E6WU25IK
129	Amazon	AIRDEA Direct	A2WFN2MFRO3ZUR
130	Amazon	LEJIA	A2XMHEIKJGV6TJ
131	Amazon	XuanPai EU	A2ZJD6RNNJ5DC0H
132	Amazon	ESHUJIA	A30802SQVO03IB
133	Amazon	LD.Butterfly	A30PN194AVZHYZ
134	Amazon	Quanzhou Jingtao Electronic Commerce Co Ltd.	A33CCI5FDR0NTM
135	Amazon	Keilis	A33OMEJBFDXFOS
136	Amazon	liuweiwei1	A33XRMV16OUO2C
137	Amazon	jianwenge	A3562Y2KZFFFJR
138	Amazon	Beautiful&sister	A38094EL0Y87RC
139	Amazon	XMxD	A39AIT3QEYO8UO
140	Amazon	ZOOYA Diamond Embroidery	A39VAYFMUBFZQD
141	Amazon	JnXos Store	A39XT3TTBV0TFL
142	Amazon	LOVE THE FAMILY	A3ABNZNMHERUI6
143	Amazon	Fengtuo Store	A3AYTZMKY70OGG
144	Amazon	TianMaiGeLun-FR	A3BNS9C8SN2WWZ
145	Amazon	U R Beautiful Direct	A3CN0KVO0W17AC
146	Amazon	HUIPEN EU	A3EWJMDJEP8N62
147	Amazon	Best&painting-YQ	A3GYA5YQBK8QJR
148	Amazon	AEVON	A3H2IM1WQHMK99
149	Amazon	BU-Zone	A3IGJBMSF6G33O
150	Amazon	LiBinWuJinDian	A3IL6L15EKZZR5
151	Amazon	yuxiabaihuo	A3JGY6HWTVO3FR
152	Amazon	lixinghuangwangluo	A3JOD2N2B2BTUI
153	Amazon	Livinglife-EU	A3JTDFHBOOZXVL

154	Amazon	SQQ	A3NNTDFP7DA4DL
155	Amazon	Aluhayu Direct	A3NTECMQ98LGXM
156	Amazon	BaoFengXianChangZhangRiYongPinXiaoShouDian	A3O50RY3BBKYR
157	Amazon	SANGHAI	A3PZ803JCTZHDE
158	Amazon	WUXINGMEILI	A3QUA9WOL33XRE
159	Amazon	jinyue us	A3T1QQYG57U1HZ
160	Amazon	BaoFengXianSiYiJiaJuYongPinDian	A3UAVKU6A5Z9JA
161	Amazon	Perfect picture	A3UCDVJKTL3QR6
162	Amazon	vbl84444bs	A3V0Q0Q9ZLA96L
163	Amazon	HitTopss	A4SMHWS3OSY0Q
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165	Amazon	Yeehyc	A6QRSZAMRT5K
166	Amazon	Xianshilianhuqulingyangbaihuodian	A7CUKAZ0EUB4S
167	Amazon	Sonsage	A7HP9FQ7G0GI8
168	Amazon	go yeah	A91XMUZSIOQJH
169	Amazon	Tople	AAYXY0A8UMCJY
170	Amazon	Herefun	ACSLD6CAJNAKQ
171	Amazon	YONGTUO EU	AE128V3OAR9WQ
172	Amazon	RiTianFa1990	AEB6E1BGPI9VV
173	Amazon	peri_us_service	AEO4X2Q8X81RU
174	Amazon	ARTDOT	AES194AY1RC5U
175	Amazon	casuaelly	AEX3UKWBXJGKX
176	Amazon	BougimalDirect	AF9BJ56EC26PC
177	Amazon	agnes grey	AFSCEPA3CFCZF
178	Amazon	bakdropday	AG0Q2AH7PWEYP
179	Amazon	longlongbeach	AG3CIDHSM6IFH
180	Amazon	NaShiGuang	AGWHYNGS5NB25
181	Amazon	Wowdecor	AIB8E7II73Y7R
182	Amazon	Jiayingda	AIEHG6R0SLSQF
183	Amazon	FFDDBBMM	AIGAHJA7DL97L
184	Amazon	Marpl®	AJSX4XRG2H6C5
185	Amazon	SuobeiTe-EU	AMB9JT71N2ARS
186	Amazon	liyantingshop520	AMHIPOGGL6KRL
187	Amazon	YZY's company	ANAW7QKDGDT1M
188	Amazon	AidaBeauty	AO7R5ZCZZQYGP
189	Amazon	Heze Company	AR8HMDX32ZDMH
190	Amazon	DAJIDALI-DE	ARN1V5NV6FNE0
191	Amazon	LiuShuangJiaJu	ASUSDRD40FE6E
192	Amazon	KaPPWT	AT3NCPAZSHGRI

193	Amazon	aezuesn	AT7504BPWKIRX
194	Amazon	TBVS 77	AT7M2U5EBUVPY
195	Amazon	SN STORE	AT984APH6VGUN
196	Amazon	Larben	AUW9I9ZXFZZK4
197	Amazon	DecalMile Direct	AVJK1AKH8CSH7
198	Amazon	mengzijiefu	AW97ETGVASV2A
199	Amazon	KoKo & Co	AYOEHDNF566M
200	Amazon	Komking-EU	AYWBVPYFVNIQ0
201	Amazon	Golden Maple 【全品30日間返品・返金保証】	AZJGD7C9FKHFL
202	Banggood	Banggood	banggood.com
203	DHgate	sophine11 Store	20329556
204	DHgate	Curtteny	21067726
205	DHgate	goodcomfortable	21441017
206	DHgate	Youlovehome	21491309
207	DHgate	kaolaya Store	21634870
208	DHgate	Hepeterr	21634995
209	eBay	3dstore3d	3dstore3d
210	eBay	aeame-qq	aeame-qq
211	eBay	best-decor	best-decor
212	eBay	caiguanghh123	caiguanghh123
213	eBay	cifbuy.mall	cifbuy.mall
214	eBay	cn.shop	cn.shop
215	eBay	dhqstore2014	dhqstore2014
216	eBay	diamonds-queen	diamonds-queen
217	eBay	donishopp	donishopp
218	eBay	it.factoryshop	it.factoryshop
219	eBay	jhhoot_2	jhhoot_2
220	eBay	kestmoti-0	kestmoti-0
221	eBay	kevin920406	kevin920406
222	eBay	khtrade	khtrade
223	eBay	maxbesty88	maxbesty88
224	eBay	new_wendz	new_wendz
225	eBay	nicelife9988	nicelife9988
226	eBay	pinp259	pinp259
227	eBay	rensm-16	rensm-16
228	eBay	som64	som64
229	eBay	suttonroadsaddler	suttonroadsaddler
230	eBay	the-fashion-hub	the-fashion-hub
231	eBay	ttc2021	ttc2021

232	eBay	ttem7016	ttem7016
233	eBay	uk.factoryshop	uk.factoryshop
234	eBay	vanmorisstore	vanmorisstore
235	eBay	xapm3913	xapm3913
236	eBay	yc-sport	yc-sport
237	eBay	zhijuanlu26_8	zhijuanlu26_8
238	Etsy	DiamondHouseArt	DiamondHouseArt
239	Etsy	DIYDiamondPaint	DIYDiamondPaint
240	Etsy	fashiontong	fashiontong
241	Etsy	GarethShopArt	GarethShopArt
242	Etsy	GlitterCraftsDeco	GlitterCraftsDeco
243	Etsy	JustPaintMY	JustPaintMY
244	Etsy	ShopbyMarkArt	ShopbyMarkArt
245	Joom	DM Crafts	5d9e9d1e1436d40301c40409
246	Joom	Love Homes	5df30bd036b54d03012dd629
247	Joom	DIY Decoration	5df30bdd8b451303012cd09a
248	Joom	Other Household	5df30c8036b54d03012df0b5
249	Joom	Ruopoty DIY Painting	600553db5ccf99000684306f
250	Joom	Painting-By-Numbers Home	60c016388ecb95be4b594c9e
251	Joom	ChengMeng Diamond Painting	610244a86f286304d672ee9c
252	Newegg	Fineros	Fineros
253	Newegg	South-City-Mall	South-City-Mall
254	Shopify	paintbynumbersonline	custompaintbynumber.co
255	Shopify	WeLuckyMeet	weluckymeet.com
256	Shopify	Australia Paint By Numbers	www.australiapaintbynumbers.com.au
257	Walmart	UR BEST CHOICE	101043412
258	Walmart	DongguanXYZElectronicTech Co., Ltd.	101043414
259	Walmart	Cool BUY	101043424
260	Walmart	JANDEL	101043438
261	Walmart	LiveinBy	101069427
262	Walmart	Daciye LLC	101072367
263	Walmart	BIOSA LLC	101080569
264	Walmart	Akloker	101081270
265	Walmart	Bemaystar	101089310
266	Walmart	Mumaoyi INC	101095805
267	Walmart	yuanwangliebiaowangluokejiyouxiangongsi	101099079
268	Wish	Isfang	53e822a74497c57e3f0aa5dd
269	Wish	Johnsondamin	59993dbb235134368917d3fa
270	Wish	LongDa168 store	5aedaf624972791a76414a70

271	Wish	jingjing art	5b4482329de0462c21524a00
272	Wish	wall canvas	5b6fbfa3f2854a3ff9730622
273	Wish	inloveart	5b78bflce056ed25d8679efe
274	Wish	BGW1314	5d45163c8388974840042cc4
275	Wish	Alimb mary	5d82fb7c163d7b6711e86ab9
276	Wish	asfaee	5e66100b29e786359b05c8ce
277	Wish	hnm2	5e673b1429e7866145176d00
278	Wish	ffh6	5e6743005890245bd113f5c3
279	Wish	vhj2	5e674687bd473e6a15b97eb0
280	Wish	fvh2	5e67496225de03138025bfd7
281	Wish	vds2	5e674fa45a3e1f64818fabb0
282	Wish	ppl6	5e68844f2fb13f19c20ba0c8
283	Wish	aer6	5e68882229e7860905459124
284	Wish	ggh6	5e688a7c552c9404e28cb01e
285	Wish	gnb6	5e688c619145ad5d25972fbb
286	Wish	xyu6	5e688eb6b1abc80708bbef6d
287	Wish	ttr6	5e689124552c9403428ccda0
288	Wish	SebastianHenryhGkZrK	5e70dde18e9bc1b0a3e1f54f
289	Wish	AngelaMikeuSIK	5e70dfc129e78657e89793ca
290	Wish	TracyEdtXoOg	5e70e061191251b384a3d739
291	Wish	LenaHilarysJpRsS	5e7191d3f31082360098a2da
292	Wish	PhyllisMarshnLqQw	5e71926657b010370e782777
293	Wish	ElliotBinglHbBa	5e719319f310820f039936d4
294	Wish	TobyHowarvZyYkL	5e7194381c5ae13801b609fb
295	Wish	AubreySharoncSrGzS	5e7195221c5ae137dab61030
296	Wish	DoloresEarthalhUh	5e719579e00b2732003bc48a
297	Wish	BishopCandicebLeBaL	5e7195b5aa163a19636dfe72
298	Wish	LenWinstonkTfBiP	5e7195e757b010399a782900
299	Wish	asbhnidchj	5e7ebdd1b6aaabffdb021e74
300	Wish	DRFHF	5e92794cbdeb4248e041f9e
301	Wish	FAChenPei	5e97181a5b1d4b2640d6a20c
302	Wish	RalapEvanjDjD	5ea67ef33f5b6a3182affae3
303	Wish	AsaJustinbrpXxZzS	5ea692e0e3501b212a7f706e
304	Wish	wuliyuen	5f1540d911f9dfb0fa1d994d
305	Wish	Windemist	5f3cc5685226c590ea77eb88

Exhibit 1

United States of America

United States Patent and Trademark Office

STARLA MICHELLE

Reg. No. 6,540,016

Registered Oct. 26, 2021

Int. Cl.: 16

Trademark

Principal Register

STARLA MICHELLE, LLC (TEXAS LIMITED LIABILITY COMPANY)
3907 KANDY DR
AUSTIN, TEXAS 787492549

CLASS 16: Art prints; Art prints on canvas; Printed art reproductions; Framed art prints; Graphic art prints; Graphic fine art prints; Printed children's coloring pages

FIRST USE 11-00-2008; IN COMMERCE 11-00-2008

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

The name(s), portrait(s), and/or signature(s) shown in the mark identifies STARLA MICHELLE HALFMANN, whose consent(s) to register is made of record.

SER. NO. 90-595,141, FILED 03-22-2021



Donna Halpmann

Performing the Functions and Duties of the
Under Secretary of Commerce for Intellectual Property and
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>.

Exhibit 2

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Karen Lewis Clayton
Acting United States Register of Copyrights and Director

Registration Number

VA 2-057-058

Effective Date of Registration:
March 10, 2016

Title

Title of Work: Rampart

Completion/Publication

Year of Completion: 2013
Date of 1st Publication: July 28, 2013
Nation of 1st Publication: United States

Author

• Author: Starla Michelle Halfmann
Author Created: 2-D artwork
Citizen of: United States
Domiciled in: United States

Copyright Claimant

Copyright Claimant: Starla Michelle Halfmann
3907 Kandy, Austin, TX, 78749, United States

Rights and Permissions

Name: Starla Michelle Halfmann
Email: halfmann.starla@gmail.com
Telephone: (512)589-3091
Address: 3907 Kandy
Austin, TX 78749 United States

Certification

Name: Starla Michelle Halfmann
Date: March 10, 2016

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Karen Lewis Clayton
Acting United States Register of Copyrights and Director

Registration Number
VA 2-057-059
Effective Date of Registration:
March 10, 2016

Title

Title of Work: R for Raccoon

Completion/Publication

Year of Completion: 2015
Date of 1st Publication: April 24, 2015
Nation of 1st Publication: United States

Author

• Author: Starla Michelle Halfmann
Author Created: 2-D artwork
Citizen of: United States
Year Born: 1980

Copyright Claimant

Copyright Claimant: Starla Michelle Halfmann
3907 Kandy, Austin, TX, 78749, United States


Rights and Permissions

Name: Starla Michelle Halfmann
Email: halfmann.starla@gmail.com
Telephone: (512)589-3091
Address: 3907 Kandy
Austin, TX 78749 United States

Certification

Name: Starla Michelle Halfmann
Date: March 10, 2016

Certificate of Registration

 This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Karen Taylor Clay
Acting United States Register of Copyrights and Director

Registration Number
VA 2-057-061
Effective Date of Registration:
March 10, 2016

Title _____

Title of Work: C for Cow

Completion/Publication _____

Year of Completion: 2015
Date of 1st Publication: April 24, 2015
Nation of 1st Publication: United States

Author _____

- Author:** Starla Michelle Halfmann
Pseudonym: StarlaMichelle
Author Created: 2-D artwork
Citizen of: United States
Year Born: 1980

Copyright Claimant _____

Copyright Claimant: Starla Michelle Halfmann
3907 Kandy, Austin, TX, 78749, United States

Rights and Permissions _____

Name: Starla Michelle Halfmann
Email: halfmann.starla@gmail.com
Telephone: (512)589-3091
Address: 3907 Kandy
Austin, TX 78749 United States

Certification _____

Name: Starla Michelle Halfmann
Date: March 10, 2016

Page 1 of 1

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marie Szym
Acting United States Register of Copyrights and Director

Registration Number

VA 2-190-295

Effective Date of Registration:

October 14, 2019

Registration Decision Date:

February 11, 2020

Title

Title of Work: **Alphabet Kingdom**

Completion/Publication

Year of Completion: 2015

Date of 1st Publication: March 26, 2019

Nation of 1st Publication: United States

International Standard Number: ISBN 978-1-944903-57-2

Author

- Author: Starla Michelle Halfmann
Author Created: 2-D artwork
Domiciled in: United States

Copyright Claimant

Copyright Claimant: Starla Michelle Halfmann
3907 Kandy, Austin, TX, 78749, United States


Rights and Permissions

Name: Starla Michelle Halfmann
Address: P.O. Box 150444
Austin, TX 78745 United States

Certification

Name: Starla Michelle Halfmann
Date: October 11, 2019

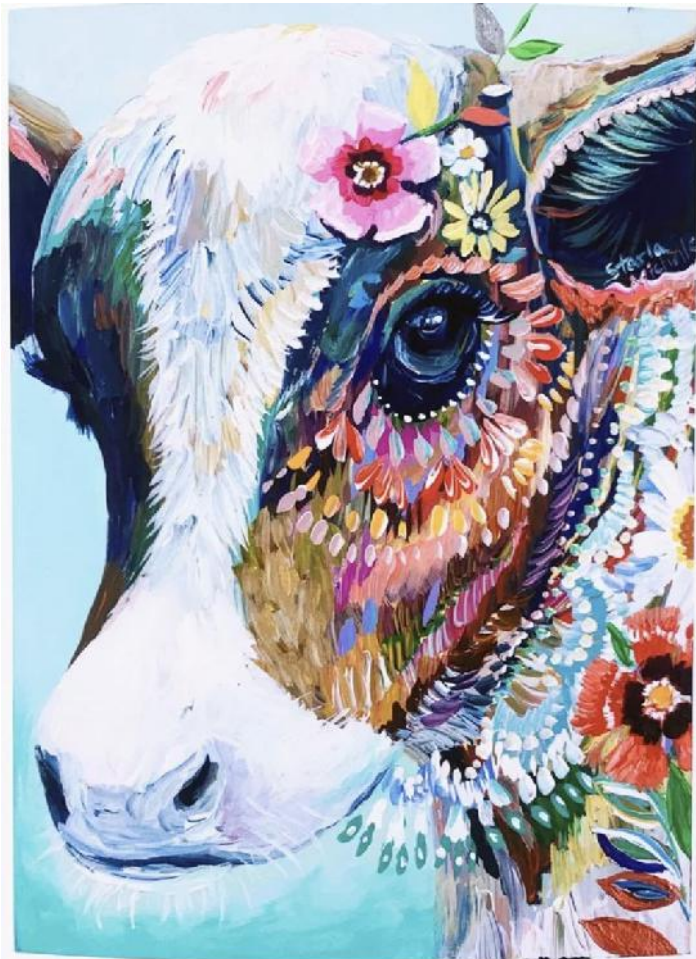
Starla Michelle Copyright Summary

Image	Filename	Registration #
	Rampart.png	VA0002057058



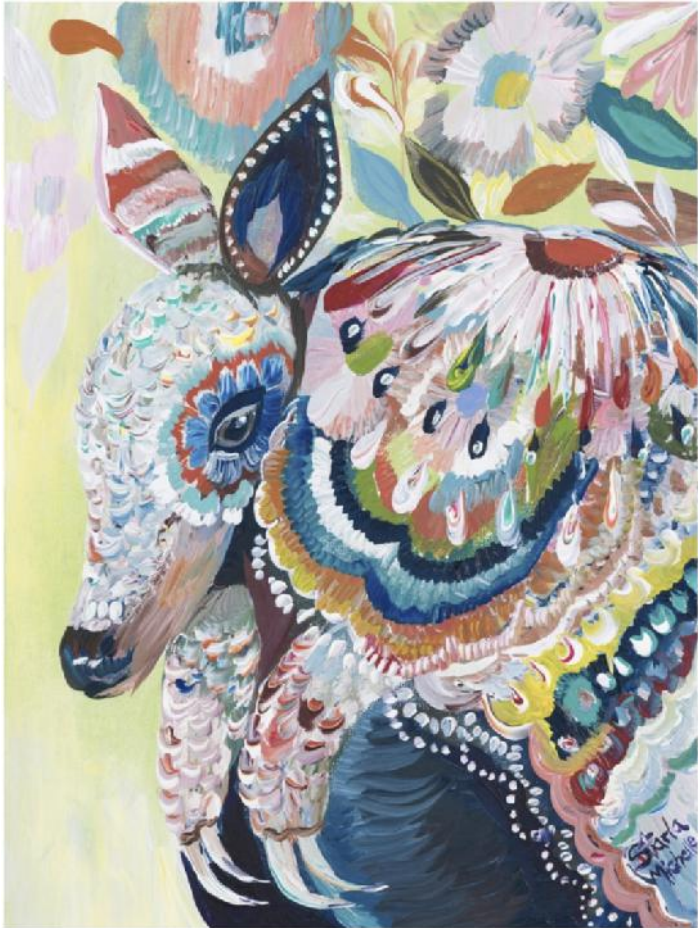
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[VA0002057059](#) /
[VA0002190295](#)



C-for-Cow.png

[VA0002057061](#) /
[VA0002190295](#)



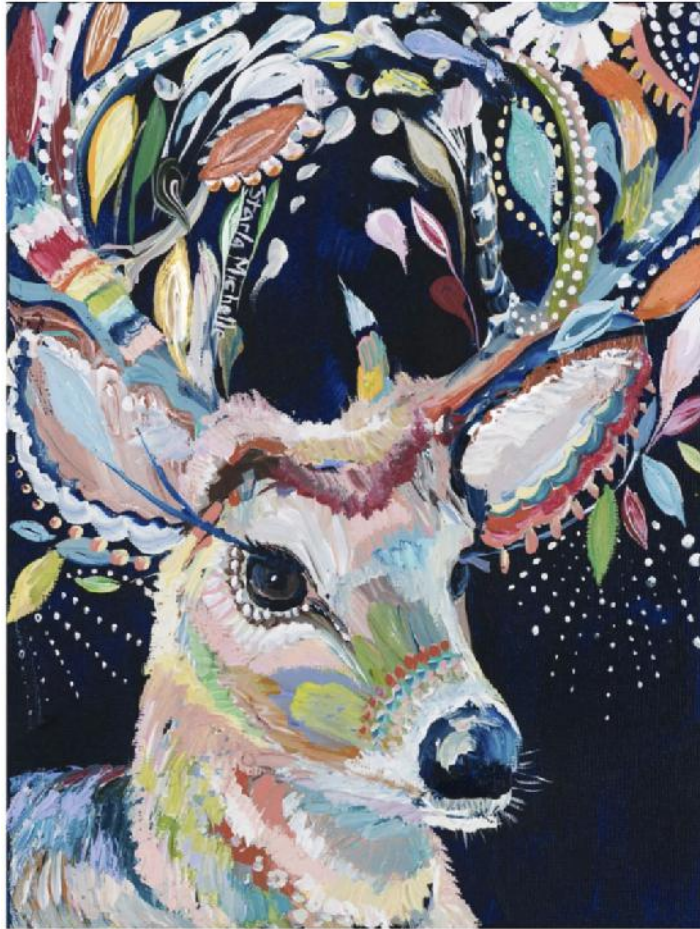
A-for-Armadillo.png

[VA0002190295](#)



B-for-Bear.png

[VA0002190295](#)



D-for-Deer.png

[VA0002190295](#)



E-for-Elephant.png

[VA0002190295](#)



F-for-Fox.png

[VA0002190295](#)



G-for-Giraffe.png

[VA0002190295](#)



L-for-Lemur.png

[VA0002190295](#)



M-for-Monkey.png

[VA0002190295](#)



M.png

[VA0002190295](#)



N-for-Nyala.png

[VA0002190295](#)



O-for-Owl.png

[VA0002190295](#)



P-for-Peacock.png

[VA0002190295](#)



S-for-Seal.png

[VA0002190295](#)



T-for-Tiger.png

[VA0002190295](#)



U-for-Unicorn.png

[VA0002190295](#)



V-for-Vulture.png

[VA0002190295](#)



Z-for-Zebra.png

[VA0002190295](#)

for the

Starla Michelle, LLC

V.

Defendant(s)

Civil Action No.

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:

CIVIL COVER SHEET
04/22/2022 Page 1 of 1

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

Starla Michelle, LLC

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

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

SRIPALAW - 561.404.4350
21301 Powerline Rd. Suite 100, Boca Raton, FL 33433

DEFENDANTS

The Individuals, Partnerships, and Unincorporated Associations
Identified on Schedule "A"

County of Residence of First Listed Defendant _____
(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)

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

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

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input checked="" type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

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 Trademark Infringement and 17 U.S.C. 501 Copyright Infringement

Brief description of cause:
Trademark and Copyrights Infringement

VII. REQUESTED IN COMPLAINT:

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

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____ DOCKET NUMBER _____

DATE

SIGNATURE OF ATTORNEY OF RECORD

4.19.2022

/s/ Joel B. Rothman

FOR OFFICE USE ONLY

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