

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Tetris Holding LLC)	
)	Case No. 1:22-cv-2605
v.)	
)	Judge: Hon. Sara L. Ellis
THE PARTNERSHIPS and)	
UNINCORPORATED ASSOCIATIONS)	Magistrate: Hon. Gabriel A. Fuentes
IDENTIFIED ON SCHEDULE A)	
_____)	

COMPLAINT

Plaintiff Tetris Holding, LLC (“Tetris”), hereby files this Complaint for, *inter alia*, trademark infringement, counterfeiting, and related claims against Defendants, on personal knowledge as to Plaintiff’s own activities and on information and belief as to the activities of others:

The Parties

1. Tetris Holding, LLC is a Nevada LLC that maintains a principal place of business at 9788 Gillespie Street, Suite 418, Las Vegas NV 89183.

2. Defendants identified on Schedule “A” are all believed to be individuals and unincorporated business associations who, upon information and belief, reside in foreign jurisdictions. The true names, identities, and addresses of Defendants are currently unknown.

3. Defendants conduct their illegal operations through fully interactive commercial websites hosted on various e-commerce sites, such as Alibaba/AliExpress, Amazon, DHgate, eBay, Joom, Newegg, Shopify, Walmart, Wish, etc. (“Infringing Websites” or “Infringing Webstores”). Each Defendant targets consumers in the United States, including the State of

Illinois, and has offered to sell and, on information and belief, has sold and continues to sell counterfeit products that violate Plaintiff's intellectual property rights ("Counterfeit Products") to consumers within the United States, including the State of Illinois and Northern District of Illinois. Defendants have the capacity to be sued pursuant to Federal Rule of Civil Procedure 17(b).

4. Through their operation of the Infringing Webstores, Defendants are directly and personally contributing to, inducing, and engaging in the sale of Counterfeit Products as alleged, oftentimes as partners, co-conspirators, and/or suppliers. Upon information and belief, Defendants are an interrelated group of counterfeiters working in active concert to knowingly and willfully manufacture, import, distribute, offer for sale, and sell Counterfeit Products. Defendants intentionally conceal their identities and the full scope of their counterfeiting operations in an effort to deter Plaintiff from learning Defendants' true identities and the exact interworking of Defendants' illegal counterfeiting operations. The identities of these Defendants are presently unknown. If their identities become known, Plaintiff will promptly amend this Complaint to identify them.

Jurisdiction and Venue

5. This is an action for trademark counterfeiting and trademark infringement and unfair competition and false designation of origin arising under the Trademark Act of 1946, 15 U.S.C. §§ 1051, et seq., as amended by the Trademark Counterfeiting Act of 1984, Public Law 98-473 (October 12, 1984), the Anti-Counterfeiting Consumer Protection Act of 1996, Pub. L. 104-153 (July 2, 1996), and the Prioritizing Resources and Organization for Intellectual Property Act of 2007, H.R. 4279 (October 13, 2008) (the "Lanham Act"), and for unlawful and deceptive acts and practices under the laws of the State of Illinois.

6. This Court has original jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1332, and 1338(a) and (b); and 15 U.S.C. §§ 1116 and 1121. This Court has jurisdiction, pursuant to the principles of supplemental jurisdiction and 28 U.S.C. § 1367, over Plaintiff's claims for unlawful and deceptive acts and practices under the laws of the State of Illinois.

7. This Court has personal jurisdiction over Defendants in that they transact business in the State of Illinois and in the Northern District of Illinois.

8. Venue is proper in this District pursuant to 28 U.S.C. § 1391 in that the Defendants are entities or individuals subject to personal jurisdiction in this District. Venue is also proper in this District because a substantial part of the events or omissions giving rise to the claims occurred in this District and Defendants directly target business activities towards consumers in the State of Illinois.

Background Facts

9. Plaintiff is the owner of the game *Tetris*, including all intellectual property rights to the name and mark "TETRIS", worldwide, and all goodwill associated with that name ("IP Rights"). Plaintiff licenses the IP Rights to The Tetris Company, Inc. ("TTC") who sublicenses the IP Rights to authorized third party licensees ("Licensees"). These Licensees manufacture, market, sell and distribute various products bearing the Tetris trademark throughout the world, including within the Northern District of Illinois District (collectively, the "Plaintiff Products") under the federally registered trademarks identified in Paragraph 10, below. Defendants' sales of Counterfeit Products in violation of Plaintiff's intellectual property rights are irreparably damaging Plaintiff.

10. Plaintiff is the owner of all rights, title, and interest in and to, *inter alia*, the TETRIS word mark and Tetris design mark (U.S. Reg. Nos. 1657499, 2288504, 2362238, 2362250,

3818232, 4313472, 4309504, 3396574, 3518292, 4592832) (collectively, the “Mark” or “Marks”). The registrations are valid, subsisting, unrevoked, and uncanceled pursuant to 15 U.S.C. § 1065. The registrations for the Marks constitutes prima facie evidence of validity and of Plaintiff’s exclusive right to use the Marks pursuant to 15 U.S.C. § 1057(b). A genuine and authentic copy of the U.S. federal trademark registration certificate for the TETRIS Marks is attached as Exhibit 1.

11. Plaintiff’s brand, symbolized by the TETRIS Mark, is a world famous video game brand and franchise with a licensing program that goes well beyond video games, including but not limited to, apparel, toys, puzzles, stationery, lottery tickets, storage containers, backpacks, lamps and more. It has been featured in the Guinness Book of World Records and recognized around the world as the first casual video game, responsible for launching a three-trillion dollar industry. As detailed below, Plaintiff has been using the TETRIS Mark in connection with the advertising and sale of Plaintiff’s Products in interstate and foreign commerce, including commerce in the State of Illinois and the Northern District of Illinois.

12. The TETRIS Mark has been widely promoted throughout the globe including within the United States. Consumers, potential consumers, and other members of the public not only associate Plaintiff’s Products with exceptional quality, style, and gameplay, but also recognize the Plaintiff’s Products sold in the United States originate exclusively with Plaintiff.

13. As of the date of this filing, Plaintiff’s Products are sold online and in retail establishments throughout the world.

14. Plaintiff maintains quality control standards for all TETRIS Products. Genuine TETRIS Plaintiff Products are distributed through a network of Licensees, distributors and

retailers, via webstores such as Amazon.com. Sales of TETRIS Products via the web and legitimate webstores represent a significant portion of Plaintiff's business.

15. The TETRIS Mark is highly visible and is a distinctive worldwide symbol of excellence in quality and uniquely associated with Plaintiff and, as a result, Plaintiff Products bearing the TETRIS Mark have significant sales.

16. The TETRIS Mark has never been assigned or licensed to any of the Defendants in this matter.

17. The TETRIS Mark is a symbol of Plaintiff's quality, reputation, and goodwill and has never been abandoned.

18. Further, Plaintiff has expended substantial time, money, and other resources developing, advertising, and otherwise promoting the TETRIS Mark.

19. Upon information and belief, at all times relevant hereto, Defendants in this action have had full knowledge of Plaintiff's ownership of the TETRIS Mark, including its exclusive right to use and license such intellectual property and the goodwill associated therewith.

20. In or around December 2021, Plaintiff identified the TETRIS Mark on the Infringing Webstores and Counterfeit Products designed to resemble authorized retail Internet stores selling genuine TETRIS Products that Defendants had reproduced, displayed, and distributed without authorization or license from Plaintiff in violation of the TETRIS Mark.

21. Defendants' use of the Mark on or in connection with the advertising, marketing, distribution, offering for sale, and sale of the Counterfeit Products is likely to cause and has caused confusion, mistake, and deception by and among consumers and is irreparably harming Plaintiff.

22. Defendants have manufactured, imported, distributed, offered for sale, and sold Counterfeit Products using the TETRIS Marks and continue to do so.

23. Defendants, without authorization or license from Plaintiff, knowingly and willfully used and continue to use the TETRIS Mark in connection with the advertisement, offer for sale, and sale of the Counterfeit Products, through, *inter alia*, the Internet. The Counterfeit Products are not genuine TETRIS Plaintiff Products. The Plaintiff did not manufacture, inspect, or package the Counterfeit Products and did not approve the Counterfeit Products for sale or distribution. Each Infringing Webstore offers shipping to the United States, including Illinois, and, on information and belief, each Defendant has sold Counterfeit Products into the United States, including Illinois.

24. Defendants falsely advertise the sale of authentic TETRIS Products through the Infringing Webstores. Defendants' Infringing Webstore listings appear to unknowing consumers to be legitimate webstores and listings, authorized to sell genuine TETRIS Plaintiff Products.

25. Defendants also deceive unknowing consumers by using the TETRIS Mark without authorization within the content, text, and/or meta tags of the listings on Infringing Webstores in order to attract various search engines crawling the Internet looking for websites relevant to consumer searches for TETRIS Products and in consumer product searches within the Webstores.

26. Defendants go to great lengths to conceal their true identities and often use multiple fictitious names and addresses to register and operate the Infringing Webstores. Upon information and belief, Defendants regularly create new Webstores on various platforms using the identities listed in Schedule "A" to the Complaint, as well as other unknown fictitious names and addresses. Such registration patterns are one of many common tactics used by the

Defendants to conceal their identities and the full scope and interworking of their illegal counterfeiting operations and to prevent the Infringing Webstores from being disabled.

27. Upon information and belief, Defendants will continue to register or acquire listings for the purpose of selling Counterfeit Products that infringe upon the TETRIS Mark unless preliminarily and permanently enjoined.

28. Plaintiff has no adequate remedy at law.

COUNT ONE
FEDERAL TRADEMARK COUNTERFEITING AND INFRINGEMENT
(15 U.S.C. §1114)

29. The Plaintiff repeats and realleges the foregoing allegations above as if fully set forth herein.

30. The Plaintiff's Mark and the goodwill of the business associated with it in the United States and throughout the world are of great and incalculable value. The Mark is highly distinctive and has become universally associated in the public mind with Plaintiff's Products and related services. Consumers associate the Plaintiff's Mark with the Plaintiff as the source of the very highest quality products.

31. Without the Plaintiff's authorization or consent, and having knowledge of the Plaintiff's well-known and prior rights in the Plaintiff's Mark and the fact that Defendants' Counterfeit Products are sold using marks which are identical or confusingly similar to the Plaintiff's Mark, the Defendants have manufactured, distributed, offered for sale, and/or sold the Counterfeit Products to the consuming public in direct competition with Plaintiff's sale of genuine Plaintiff Products, in or affecting interstate commerce.

32. Defendants' use of copies or approximations of the Plaintiff's Mark in conjunction with Defendant's Counterfeit Products is likely to cause and is causing confusion, mistake, and deception among the general purchasing public as to the origin of the Counterfeit Products and is likely to deceive the public into believing the Counterfeit Products being sold by Defendants originate from, are associated with, or are otherwise authorized by the Plaintiff, all to the damage and detriment of the Plaintiff's reputation, goodwill, and sales.

33. The Plaintiff has no adequate remedy at law and, if Defendants' activities are not enjoined, the Plaintiff will continue to suffer irreparable harm and injury to its goodwill and reputation.

COUNT TWO
UNFAIR COMPETITION AND FALSE DESIGNATION OF ORIGIN
(15 U.S.C. §1125(a))

34. The Plaintiff repeats and realleges the foregoing allegations above as if fully set forth herein.

35. The Counterfeit Products sold and offered for sale by Defendants are of the same nature and type as the Plaintiff's Products sold and offered for sale by the Plaintiff, TTC or Licensees and, as such, Defendants' use is likely to cause confusion to the general purchasing public.

36. By misappropriating and using the Plaintiff's Marks and trade names, Defendants misrepresent and falsely describe to the general public the origin and source of the Counterfeit Products and create a likelihood of confusion by consumers as to the source of such merchandise.

37. Defendants' unlawful, unauthorized, and unlicensed manufacture, distribution, offer for sale, and/or sale of the Counterfeit Products creates express and implied misrepresentations that the Counterfeit Products were created, authorized, or approved by the Plaintiff, all to Defendants' profit and to the Plaintiff's great damage and injury.

38. Defendants' aforesaid acts are in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), in that Defendants' use of the Plaintiff's Mark and trade names, in connection with their goods and services in interstate commerce, constitutes a false designation of origin and unfair competition.

39. The Plaintiff has no adequate remedy at law and, if the Defendants' activities are not enjoined, Plaintiffs will continue to suffer irreparable harm and injury to their goodwill and reputation.

COUNT THREE
FEDERAL TRADEMARK DILUTION
(15 U.S.C. §1125(c))

40. The Plaintiff repeats and realleges the foregoing allegations above as if fully set forth herein.

41. By reason of Plaintiff's extensive advertising and promotion of the Marks, Plaintiff's, TTC's or Licensees' sale of goods bearing the Marks, Plaintiff's registration and protection of the Marks, and extensive unsolicited news and editorial coverage, the Marks have become famous and well-known throughout the United States and abroad and are uniquely and exclusively associated with Plaintiff within the meaning of 15. U.S.C. § 1125(c).

42. Upon information and belief, Defendants' are and have been engaged in commercial use of the Marks in interstate commerce.

43. Upon information and belief, Defendants' herein-described unlawful activities have caused actual dilution and have disparaged, damaged and lessened the distinctiveness of the Marks by blurring and tarnishing them.

44. Upon information and belief, Defendants' infringing and diluting actions were completed intentionally or with a reckless disregard for or willful blindness to Plaintiff's rights for the express purpose of trading on Plaintiff's reputation and diluting the Marks.

45. Defendants' aforesaid acts are in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(c), in that Defendants' use of the Plaintiff's Mark and trade names, in connection with their goods and services in interstate commerce, constitutes a false designation of origin and unfair competition.

46. The Plaintiff has no adequate remedy at law and, if the Defendants' activities are not enjoined, Plaintiffs will continue to suffer irreparable harm and injury to their goodwill and reputation.

COUNT FOUR
ILLINOIS UNIFORM DECEPTIVE TRADE PRACTICES (815 ILCS 510)

47. The Plaintiff repeats and realleges the foregoing allegations above as if fully set forth herein.

48. The Counterfeit Products sold and offered for sale by Defendants are of the same nature and type as the Plaintiff's Products sold and offered for sale by the Plaintiff, TTC or Licensees and, as such, Defendants' use is likely to cause confusion to the general purchasing public.

49. By misappropriating and using the Plaintiff's Mark and trade names, Defendants misrepresent and falsely describe to the general public the origin and source of the Counterfeit

Products and create a likelihood of confusion by consumers as to the source of such merchandise.

50. Defendants' unlawful, unauthorized, and unlicensed manufacture, distribution, offer for sale, and/or sale of the Counterfeit Products creates express and implied misrepresentations that the Counterfeit Products were created, authorized, or approved by the Plaintiff, all to the Defendants' profit and to the Plaintiff's great damage and injury.

51. Defendants' aforesaid acts are in violation of the Illinois Uniform Deceptive Trade Practices Act, 815 ILCS 510/2 *et seq.*, in that Defendants' use of the Plaintiff's Mark and trade names, in connection with their goods and services in interstate commerce, constitutes a false designation of origin and unfair competition.

52. Plaintiffs have no adequate remedy at law and, if the Defendants' activities are not enjoined, the Plaintiff will continue to suffer irreparable harm and injury to its goodwill and reputation.

Prayer for Relief

WHEREFORE, the Plaintiff prays for judgment against Defendants in favor of the Plaintiff on all counts as follows:

1. That Defendants, their officers, agents, servants, employees, attorneys, confederates, and all persons in active concert with them be temporarily, preliminarily, and permanently enjoined and restrained from:

(i) using the Plaintiff's Marks or any reproduction, counterfeit, copy, or colorable imitation of the Plaintiff's Mark in connection with the distribution, advertising, offer for sale, and/or sale of merchandise not the genuine products of the Plaintiff; and

(ii) passing off, inducing, or enabling others to sell or pass off any Counterfeit Products as genuine products made and/or sold by the Plaintiff; and

(iii) committing any acts calculated to cause consumers to believe that Defendants' Counterfeit Products are those sold under the authorization, control, or supervision of Plaintiff, or are sponsored by, approved by, or otherwise connected with Plaintiff;

(iv) further infringing the Plaintiff's Mark and damaging Plaintiff's goodwill;

(v) competing unfairly with Plaintiff in any manner;

(vi) shipping, delivering, holding for sale, distributing, returning, transferring or otherwise moving, storing, or disposing of in any manner products or inventory not manufactured by or for Plaintiff, nor authorized by Plaintiff to be sold or offered for sale, and that bear the TETRIS Mark or any reproductions, counterfeit copies, or colorable imitations thereof;

(vii) using, linking to, transferring, selling, exercising control over, or otherwise owning or operating the Infringing Webstores, listings, or any other domain name that is being used to sell or is the means by which Defendants could continue to sell Counterfeit Products;

(viii) operating and/or hosting websites at the Infringing Webstores and any other domain names registered or operated by Defendants that are involved with the distribution, marketing, advertising, offering for sale, or sale of any product bearing the Plaintiff's Mark or any reproduction, counterfeit copy, or colorable imitation thereof that is not a genuine product or not authorized by Plaintiff to be sold in connection with the Plaintiff's Mark; and

(ix) registering any additional domain names that use or incorporate any of the Plaintiff's Marks; and

2. That Defendants, within ten days after service of judgment with notice of entry thereof upon them, be required to file with the Court and serve upon the Plaintiff a written report under oath setting forth in detail the manner in which Defendants have complied with any and all injunctive relief ordered by this Court.

3. Entry of an order that, upon Plaintiff's request, those in privity with Defendants and those with notice of the injunction, including any Internet search engines, Webstore hosts or their administrators that are provided with notice of the injunction, cease facilitating access to any or all webstores through which Defendants engage in the sale of Counterfeit Products using the Plaintiff's Mark;

4. That Defendants' account for and pay over to Plaintiff any and all profits realized by Defendants by reason of Defendants' unlawful acts herein alleged, and that the amount of damages for infringement of the TETRIS Mark be increased by a sum not exceeding three times the amount thereof as provided by law as provided by 15 U.S.C. § 1117;

5. In the alternative, that Plaintiff be awarded statutory damages of Two Hundred and Fifty Thousand Dollars (U.S.) and No Cents (\$250,000.00) for each and every use of the Plaintiff's Mark counterfeited by each Defendant;

6. That Plaintiff be awarded its reasonable attorneys' fees and costs; and

7. Grant Plaintiff such other and further legal relief as may be just and proper.

Respectfully submitted,

By: s/David Gulbransen/

David Gulbransen
Attorney of Record

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Int. Cl.: 28

Prior U.S. Cls.: 2, 22, 23 and 38

Reg. No. 1,657,499

United States Patent and Trademark Office Registered Sep. 17, 1991

**TRADEMARK
PRINCIPAL REGISTER**

TETRIS

V/O ELEKTRONORGTEKHNIKA (SOVIET
UNION CITIZEN)
CHAIKOVSKY STREET, 11A
121099 MOSCOW, SOVIET UNION

FOR: GAMES AND PLAYTHINGS; NAMELY,
ACTION FIGURES; BAGATELLE GAMES;
BATH TOYS; BEANBAG GAMES; BOARD
GAMES; BOP BAGS; VIDEO GAMES, CARRY-
ING CASES, HOLDERS, RACKS AND STOR-
AGE CASES FOR HOME VIDEO GAME SYS-
TEMS AND VIDEO GAME CARTRIDGES;
CARD GAMES; DART GUNS; DECORATIVE
WIND SOCKS; DOLLS; ELECTRONIC EXER-
CISE MATS INTERACTIVE WITH A VIDEO
GAME DISPLAY; ELECTRONIC GAME EQUIP-
MENT FOR PLAYING VIDEO GAMES; ELEC-
TRONIC GAME PROGRAMS; ELECTRONIC
TOYS WITH A CLOCK OR TIMEPIECE FEAT-
URE, HAND-HELD ELECTRONIC TOYS; TOY
KALEIDOSCOPES; KITES, MAGNETIC
SLATES; NONELECTRONIC HAND-HELD

GAMES; PINBALL GAMES; PLAYER-OPERAT-
ED ELECTRONIC CONTROLLERS FOR ELEC-
TRONIC VIDEO GAME MACHINES; PLUSH
DOLLS; PUPPETS; JIGSAW PUZZLES; RING
TOSS GAMES; TARGET SETS COMPOSED OF
TARGETS AND PROJECTILES; TOY BAL-
LOONS, TOY BANKS; TOY BINOCULARS, TOY
BOWLING SETS COMPOSED OF BOWLING
PINS AND BOWLING BALLS; TOY FIGURES
MOUNTABLE ON PENCILS AND PENS; TOY
LIGHT GUNS INTERACTIVE WITH A VIDEO
GAME DISPLAY; TOY VEHICLES; WATER-
ACTIVATED BAGATELLE GAMES, WIND-UP
TOYS, AND YO-YOS, IN CLASS 28 (U.S. CLS. 2,
22, 23 AND 38).

FIRST USE 6-2-1989; IN COMMERCE
6-2-1989.

SER. NO. 74-036,747, FILED 3-8-1990.

JEFFREY SMITH, EXAMINING ATTORNEY

Int. Cls.: 9 and 28

Prior U.S. Cls.: 21, 22, 23, 26, 36, 38 and 50

Reg. No. 2,288,504

United States Patent and Trademark Office

Registered Oct. 26, 1999

**TRADEMARK
PRINCIPAL REGISTER**

SENSORY MARK—NO DRAWING

ZAO ELORG (RUSSIAN FEDERATIO CLOSED
STOCK COMPANY), AKA ELORG CORPO-
RATION
2-403 SHMITOVSKY STREET
123100 MOSCOW, RUSSIAN FEDERATIO

FOR: VIDEO GAME MACHINES FOR USE
WITH TELEVISIONS, VIDEO GAME CAR-
TRIDGES THEREFOR, AND COMPUTER
GAME SOFTWARE, ALL FOR USE IN PLAY-
ING A PROPRIETARY GAME, IN CLASS 9
(U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 6-2-1989; IN COMMERCE
6-2-1989.

FOR: HAND HELD UNITS FOR PLAYING A
PROPRIETARY ELECTRONIC GAME AND

GAME CARTRIDGES THEREFOR, IN CLASS
28 (U.S. CLS. 22, 23, 38 AND 50).

FIRST USE 6-2-1989; IN COMMERCE
6-2-1989.

OWNER OF U.S. REG. NOS. 1,657,499, 1,753,062
AND OTHERS.

THE TRADEMARK COMPRISES AN IN-
STRUMENTAL TUNE IN THE STYLE OF A
RUSSIAN FOLK SONG IN 2/2 TIME OR CUT
TIME HAVING AT LEAST TWO 8-BAR
PHRASES.

SER. NO. 75-389,198, FILED 11-10-1997.

MELVIN AXILBUND, EXAMINING ATTOR-
NEY

Int. Cls.: 9, 16 and 25

**Prior U.S. Cls.: 2, 5, 21, 22, 23, 26, 29, 36, 37,
38, 39 and 50**

Reg. No. 2,362,238

United States Patent and Trademark Office

Registered June 27, 2000

**TRADEMARK
PRINCIPAL REGISTER**

TETRIS

ZAO ELORG (RUSSIAN FEDERATIO CORPORA-
TION), AKA ELORG CORPORATION
P.O. BOX A-78
123007 MOSCOW, RUSSIAN FEDERATIO

FOR: VIDEO GAME CARTRIDGES AND SOFT-
WARE FOR PLAYING VIDEO GAMES, IN CLASS
9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 6-2-1989; IN COMMERCE 6-2-1989.
FOR: PENS, IN CLASS 16 (U.S. CLS. 2, 5, 22,
23, 29, 37, 38 AND 50).

FIRST USE 8-0-1991; IN COMMERCE 8-0-1991.
FOR: CLOTHING, NAMELY, SHIRTS, HATS, T-
SHIRTS, AND JACKETS, IN CLASS 25 (U.S. CLS.
22 AND 39).

FIRST USE 8-0-1991; IN COMMERCE 8-0-1991.
OWNER OF U.S. REG. NOS. 1,657,499, 2,288,504
AND OTHERS.

SER. NO. 75-781,744, FILED 8-20-1999.

WENDY GOODMAN, EXAMINING ATTORNEY

Int. Cls.: 9, 16, 25 and 28

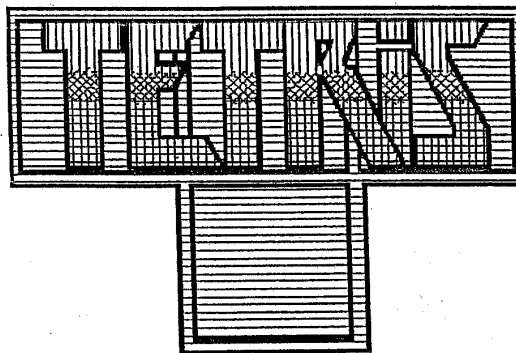
**Prior U.S. Cls.: 2, 5, 21, 22, 23, 26, 29, 36, 37,
38, 39 and 50**

Reg. No. 2,362,250

United States Patent and Trademark Office

Registered June 27, 2000

**TRADEMARK
PRINCIPAL REGISTER**



ZAO ELORG (RUSSIAN FEDERATIO CORPORA-
TION), AKA ELORG CORPORATION
P.O. BOX A-78
123007 MOSCOW, RUSSIAN FEDERATIO

FOR: VIDEO GAME CARTRIDGES AND SOFT-
WARE FOR PLAYING VIDEO GAMES, IN CLASS
9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 6-0-1997; IN COMMERCE 10-0-1998.

FOR: PENS, IN CLASS 16 (U.S. CLS. 2, 5, 22,
23, 29, 37, 38 AND 50).

FIRST USE 11-0-1998; IN COMMERCE 11-0-1998.

FOR: CLOTHING, NAMELY, SHIRTS, HATS, T-
SHIRTS AND JACKETS, IN CLASS 25 (U.S. CLS.
22 AND 39).

FIRST USE 11-0-1998; IN COMMERCE 11-0-1998.

FOR: HAND-HELD VIDEO GAMES, IN CLASS 28
(U.S. CLS. 22, 23, 38 AND 50).

FIRST USE 11-0-1998; IN COMMERCE 11-0-1998.

OWNER OF U.S. REG. NOS. 1,657,499, 2,288,504
AND OTHERS.

THE DRAWING IS LINED FOR COLOR. THE
WORD TETRIS INSIDE THE T IS LINED FOR GRA-
DIENT COLOR, THE TOP OF LETTERS BEING RED,
AND FROM RED TO ORANGE, ORANGE TO YEL-
LOW, AND YELLOW AT THE BOTTOM OF THE
LETTERS. THE T-SHAPED BACKGROUND COLOR
IS BLUE. THE T-SHAPE INDICATES A PLAYING
PIECE KNOWN AS A "TETRIMINO."

SER. NO. 75-782,993, FILED 8-20-1999.

WENDY GOODMAN, EXAMINING ATTORNEY

United States of America

United States Patent and Trademark Office



Reg. No. 3,818,232

Registered July 13, 2010

Int. Cl.: 41

SERVICE MARK

PRINCIPAL REGISTER

TETRIS HOLDING LLC (DELAWARE LIMITED LIABILITY COMPANY)
1209 ORANGE STREET
WILMINGTON, DE 19801

FOR: ENTERTAINMENT SERVICES, NAMELY, PROVIDING ON-LINE COMPUTER GAMES;
PROVIDING INFORMATION ON-LINE RELATING TO COMPUTER GAMES AND COM-
PUTER ENHANCEMENTS FOR GAMES, IN CLASS 41 (U.S. CLS. 100, 101 AND 107).

FIRST USE 6-2-1989; IN COMMERCE 4-8-2008.

OWNER OF U.S. REG. NOS. 1,657,499, 3,518,292 AND OTHERS.

THE COLOR(S) BLUE, YELLOW, ORANGE AND RED IS/ARE CLAIMED AS A FEATURE
OF THE MARK.

THE MARK CONSISTS OF A BLUE "T"-SHAPED FIELD OUTLINED IN RED, WITH THE
WORD "TETRIS" IN THE UPPER PART OF THE "T", THE LETTERS IN "TETRIS" HAVING
A TOP TO BOTTOM COLOR GRADIENT FROM RED TO ORANGE TO YELLOW.

SER. NO. 77-890,492, FILED 12-10-2009.

SAIMA MAKHDOOM, EXAMINING ATTORNEY



David J. Kypos

Director of the United States Patent and Trademark Office

United States of America

United States Patent and Trademark Office

TETRIS

Reg. No. 4,313,472

Registered Apr. 2, 2013

Int. Cl.: 28

TRADEMARK

PRINCIPAL REGISTER

TETRIS HOLDING LLC (DELAWARE LIMITED LIABILITY COMPANY)
1209 ORANGE STREET
WILMINGTON, DE 19801

FOR: HANDHELD ELECTRONIC UNITS FOR PLAYING VIDEO GAMES OTHER THAN THOSE ADAPTED FOR USE WITH AN EXTERNAL DISPLAY SCREEN OR MONITOR; CARD GAMES; SINGLE PLAYER STRATEGY GAMES INCLUDING PRINTED CHALLENGE PUZZLES AND PIECES TO ARRANGE IN ORDER TO MEET THE CHALLENGE; JIGSAW PUZZLES; MANIPULATIVE PUZZLES; THREE-DIMENSIONAL PUZZLES; STRESS RELIEF TOYS, NAMELY, SQUEEZABLE BLOCKS FOR HAND EXERCISE; LOTTERY CARDS AND TICKETS; TABLE TOP GAMES, NAMELY, GAMES COMPRISING A VERTICAL MATRIX INTO WHICH GAME PIECES ARE DROPPED; STACKING TOYS; STACKING GAMES USING THREE-DIMENSIONAL BLOCKS AND CUBES, IN CLASS 28 (U.S. CLS. 22, 23, 38 AND 50).

FIRST USE 0-0-1989; IN COMMERCE 0-0-1998.

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

OWNER OF U.S. REG. NOS. 1,657,499, 2,362,250, AND OTHERS.

SN 85-159,237, FILED 10-22-2010.

JANET LEE, EXAMINING ATTORNEY



Lee Street Lee

Acting Director of the United States Patent and Trademark Office

United States of America

United States Patent and Trademark Office



Reg. No. 4,309,504

Registered Mar. 26, 2013

Int. Cl.: 28

TRADEMARK

PRINCIPAL REGISTER

TETRIS HOLDING LLC (DELAWARE LIMITED LIABILITY COMPANY)
1209 ORANGE STREET
WILMINGTON, DE 19801

FOR: HANDHELD ELECTRONIC UNITS FOR PLAYING VIDEO GAMES OTHER THAN THOSE ADAPTED FOR USE WITH AN EXTERNAL DISPLAY SCREEN OR MONITOR; CARD GAMES; SINGLE PLAYER STRATEGY GAMES INCLUDING PRINTED CHALLENGE PUZZLES AND PIECES TO ARRANGE IN ORDER TO MEET THE CHALLENGE; JIGSAW PUZZLES; MANIPULATIVE PUZZLES; THREE-DIMENSIONAL PUZZLES; STRESS RELIEF TOYS, NAMELY, SQUEEZABLE BLOCKS FOR HAND EXERCISE; LOTTERY CARDS AND TICKETS; TABLE TOP GAMES, NAMELY, GAMES COMPRISING A VERTICAL MATRIX INTO WHICH GAME PIECES ARE DROPPED; STACKING TOYS; STACKING GAMES USING THREE-DIMENSIONAL BLOCKS AND CUBES, IN CLASS 28 (U.S. CLS. 22, 23, 38 AND 50).

FIRST USE 0-0-1989; IN COMMERCE 11-0-1998.

OWNER OF U.S. REG. NOS. 1,657,499, 3,623,600, AND OTHERS.

THE COLOR(S) BLUE, YELLOW, ORANGE AND RED IS/ARE CLAIMED AS A FEATURE OF THE MARK.

THE MARK CONSISTS OF A BLUE "T" SHAPED FIELD OUTLINED IN RED, WITH THE WORD "TETRIS" IN THE UPPER PART OF THE "T", THE LETTERS IN "TETRIS" HAVING A TOP TO BOTTOM COLOR GRADIENT FROM RED TO ORANGE TO YELLOW.

SN 85-159,247, FILED 10-22-2010.

JANET LEE, EXAMINING ATTORNEY



Janet Lee
Acting Director of the United States Patent and Trademark Office

Int. Cl.: 35

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

United States Patent and Trademark Office

Reg. No. 3,396,574

Registered Mar. 11, 2008

**SERVICE MARK
PRINCIPAL REGISTER**

TETRIS

TETRIS HOLDING LLC (DELAWARE LTD LIAB
CO)
1209 ORANGE STREET
WILMINGTON, DE 19801

FOR: COMPUTERIZED ON-LINE RETAIL STORE
SERVICES IN THE FIELD OF COMPUTER AND
VIDEO GAMES; PROMOTING THE GOODS AND
SERVICES OF OTHERS BY MEANS OF OPERAT-
ING AN ON-LINE SHOPPING MALL WITH LINKS
TO THE RETAIL WEB SITES OF OTHERS; PRO-
MOTING THE GOODS AND SERVICES OF OTHERS
THROUGH ON-LINE ORDERING AND CATALO-
GING OF THOSE GOODS AND SERVICES; PRO-
VIDING AN ON-LINE COMPUTER DATABASE
FEATURING TRADE INFORMATION IN THE

FIELD OF COMPUTER AND VIDEO GAMES, IN
CLASS 35 (U.S. CLS. 100, 101 AND 102).

FIRST USE 6-2-1989; IN COMMERCE 2-22-2007.

THE MARK CONSISTS OF STANDARD CHAR-
ACTERS WITHOUT CLAIM TO ANY PARTICULAR
FONT, STYLE, SIZE, OR COLOR.

OWNER OF U.S. REG. NOS. 1,657,499, 2,362,238,
AND 2,362,250.

SN 78-979,550, FILED 2-10-2006.

MATTHEW PAPPAS, EXAMINING ATTORNEY

Int. Cls.: 38 and 41

Prior U.S. Cls.: 100, 101, 104, and 107

United States Patent and Trademark Office

Reg. No. 3,518,292

Registered Oct. 14, 2008

**SERVICE MARK
PRINCIPAL REGISTER**

TETRIS

TETRIS HOLDING LLC (DELAWARE LIMITED
LIABILITY COMPANY)
1209 ORANGE STREET
WILMINGTON, DE 19801

FOR: PROVIDING ELECTRONIC BULLETIN
BOARDS FOR TRANSMISSION OF MESSAGES
AMONG USERS IN THE FIELD OF GENERAL
INTEREST, IN CLASS 38 (U.S. CLS. 100, 101 AND 104).

FIRST USE 6-2-1989; IN COMMERCE 4-8-2008.

FOR: ENTERTAINMENT SERVICES, NAMELY,
PROVIDING ON-LINE COMPUTER GAMES; PRO-
VIDING INFORMATION ON-LINE RELATING TO
COMPUTER GAMES AND COMPUTER ENHANCE-

MENTS FOR GAMES, IN CLASS 41 (U.S. CLS. 100,
101 AND 107).

FIRST USE 6-2-1989; IN COMMERCE 4-8-2008.

THE MARK CONSISTS OF STANDARD CHAR-
ACTERS WITHOUT CLAIM TO ANY PARTICULAR
FONT, STYLE, SIZE, OR COLOR.

OWNER OF U.S. REG. NOS. 1,657,499, 2,362,238,
AND 2,362,250.

SN 78-811,849, FILED 2-10-2006.

MATTHEW PAPPAS, EXAMINING ATTORNEY

United States of America

United States Patent and Trademark Office

TETRIS

Reg. No. 4,592,832

Registered Aug. 26, 2014

Int. Cl.: 11

TRADEMARK

PRINCIPAL REGISTER

TETRIS HOLDING, LLC (DELAWARE LIMITED LIABILITY COMPANY)
1209 ORANGE STREET
WILMINGTON, DE 19801

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

FIRST USE 11-1-2012; IN COMMERCE 11-1-2012.

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

OWNER OF U.S. REG. NOS. 1,657,499, 2,362,250 AND OTHERS.

SER. NO. 86-178,470, FILED 1-29-2014.

LAURIE KAUFMAN, EXAMINING ATTORNEY



Michelle K. Lee

Deputy Director of the United States
Patent and Trademark Office

Schedule A

Doe	Store Name	Merchant ID
1	Zhongshan Aha Lighting Technology Co., Ltd.	ahalighting
2	Huizhou Betop Opto Technology Co., Limited Trading Company	betopopto
3	Dalian Seleed Co., Ltd.	dlseleed
4	Guangzhou Linhua Technology Co., Ltd.	linhuabusiness
5	Shenzhen New Forest Lighting Co., Ltd.	newforest517
6	Anhui Liangliang Electronic Technology Co., Ltd.	vallight
7	Shen Zhen Jin Ji Shi Technology Co., Ltd.	zingiest
8	BEFJOY Official Store	324218
9	AUSIDA Official Store	905340
10	YUENSLIGHTING Official Store	911522
11	sanyi LED Lighting Store	1724007
12	World Trading's LedLights Store	1725033
13	mixxar Official Store	1750020
14	HomEarl Store	2217104
15	Ali ZMLHM Houseware Store	2655027
16	Shop2805120 Store	2805120
17	Coquimbo Franchised Store	2805126
18	DVOLADOR Lighting Store	2971015
19	tremblay Store	4052010
20	Aliexpress Homey Groceries Store	4405076
21	lighting your life Store	4411151
22	HZFCEW my light Store	4422146
23	ONLOVE Living Store	910352035
24	Life Lighten Up Store	910558029
25	Niblink Store	910959064
26	Shop911029014 Store	911029014
27	Return to life Store	911036036
28	Soucion Life Outlet Oversea Store	911046220
29	Nesmart Led Light Store	911121009
30	Sourcion FFP2 KN95 Factory Store	911131281
31	Shop911261393 Store	911261393
32	Jingzhe Store	911293176
33	My Lightting Life Store	912215225
34	Modern-Home Mart Store	912245168
35	LED Light Light Store	912259531
36	ccy trading Store	912265643
37	House Lamp-Lights Store	912367975
38	xiao9A Store	912566350
39	Likeeasy atHome Store	912581132
40	SINGSUN-LITE outlet Store	912656652
41	Interesting Lamp Store	912685412
42	Dazzling lighting Store	912689442
43	Loschen Direct	A16PWE3UTZTBEN

44	Mode de vie	A1LWO1FLPHF1A6
45	iBccly Direct	A1N2N9LCJ59FCK
46	ETETOYS	A1NYP6I00PM7M5
47	Faceueo	A1OJMLDTIDJR DY
48	Dolan International Trading Co., Ltd.	A1VJ95PUHUE2FY
49	Goods & Gadgets GmbH	A1VQY5CTQUTDMW
50	ItaNest	A1YX2Z3LLHK2Z9
51	ZIJIEL	A1ZQUQZPBWAOBO
52	xiaodongshop	A1ZSRQI95W3XO7
53	YOUYUELAI	A258QJR2CU9AHC
54	Halloumi Hut	A2D1XVQK854ADG
55	YILAN STORE	A2F5XN49G7E3BC
56	LDO Shop	A2HQLF0HZQ99SD
57	Cozy Vibe	A2UL6YK0S09HYJ
58	XIANGYUNTENGFEI	A2YRHAZ5KK8SGZ
59	Store S Cool	A2ZJBZ7YX8AVWV
60	Winsso Group	A32N7PQO49JTKH
61	Eu-Shop Limited	A334DBQ4RRSUFB
62	Owl vending machine	A34CYWX2BD0SRI
63	Vencyyy	A35QL8S4088DL4
64	Shenanya	A37MPN8FNPURE6
65	Leadsto future	A3BUO592RYR9JH
66	JIAJUYONGPINGDIAN	A3DZDYJ4WKE6NE
67	chensijun20189547	A3EBJFG8GBQ4ES
68	Bin-us	A3J4WNYZFG8EAR
69	TeAmoDD	A3JBO4D30SU2KJ
70	Alice Strackvial	A3M23W6FVC3VDD
71	Yasashi11	A3PXMK7WTWSTOW
72	Boone	A3S4426SOTFIXN
73	QWKJ-UK	A3SAQJ7ZLOVQA2
74	DedalanW	A3UNZVKDWLUCSV
75	MAT VIP Store	ADE6VTOM5H0JE
76	Sandra Lawrence Collection	AKTKCJN2HITPI
77	YINGGE store	APT3ISC8091RK
78	JIUDIAORİYONG	ASKW8GT77OQD5
79	GLOBAL Lights Technology Store	14774158
80	ivy_business Store	20114616
81	iped2016 Store	20191207
82	lighting_offer Store	20397997
83	yzstage Store	21006224
84	vogliovoi lights Store	21059136
85	xiangyu522 Store	21130232
86	zaful Store	21225423
87	hnhaoxin Store	21291324
88	walkermove Store	21531839
89	GoodVapeFactory Store	21562718

90	yy_dhhome Store	21595652
91	yummy_shop Store	21632535
92	locasaa Store	21634897
93	montrezlharrell Store	21635520
94	bobbybrown Store	21635525
95	anywong Store	21635526
96	zhenbanqao Store	21635531
97	Cell Phones Accessories Store	21674446
98	at..home	at..home
99	babiesclothes	babiesclothes
100	geetsadakalu_0	geetsadakalu_0
101	haiyonda0	haiyonda0
102	homecare4u_1	homecare4u_1
103	kim_online_store	kim_online_store
104	kristina.toys	kristina.toys
105	lakshan_92	lakshan_92
106	marshallsupplies	marshallsupplies
107	nihalshop	nihalshop
108	oldskoolreg	oldskoolreg
109	ranasinghe-stores	ranasinghe-stores
110	rc_express_online	rc_express_online
111	rohan_e_mart	rohan_e_mart
112	shopper.wave	shopper.wave
113	smrj_store	smrj_store
114	speedhawk10_5	speedhawk10_5
115	unique_items_2020	unique_items_2020
116	MyPreciousGoodies	MyPreciousGoodies
117	privatekota	privatekota
118	TopitemsByDana	TopitemsByDana
119	Acelotti	Acelotti
120	CHOWS' TRADING	CHOWS-TRADING
121	Fineros	Fineros
122	Halfjune	Halfjune
123	Hugogres	Hugogres
124	Livesture	Livesture
125	Loreesoul	Loreesoul
126	Lotinni	Lotinni
127	Mega Save Wholesale & Retail	Mega-Save-Wholesale-Retail
128	Redbey	Redbey
129	Royal beller	Royal-beller
130	Royalbeller	Royalbeller
131	Sennow	Sennow
132	Surjion	Surjion
133	Stackable Tetris Lamp	dealsdirect.nz
134	Development & Holdings	developmentandholdings.com
135	hazeljaryjar-com.myshopify.com	hazeljaryjar-com.myshopify.com

136	HENGSI TECH STORE	hengsi.store
137	Shenzhen Weitian Industrial Co., Ltd.	101043398
138	Qingtian Diaocheng Trading Co., Ltd.	101044606
139	shenzhenshimeihuidawangluokejiyouxiangongs	101044684
140	Coquimbo store	101091344
141	YISHUDIANZI	101103356
142	Jambalaya	5979570d8d556536d4551da1
143	ohhyeahproducts	598be2fcae228e13e28f52a6
144	Luckyholiday	59d06d058696be038e7c18cc
145	Ningbo tools store	5d3e523dab0c797b71a592f6
146	VVip Top Store	5d491ac222f30130b6dadf07
147	objklzh	5d4d13ca83889747c777dea5
148	Peter Henry	5e7b0fe4d14fc41d9b2449fa
149	Mark Parton	5e7b163b128ea1217306ebe3
150	Hazel Rosario	5e7b16a80abba51c885e6b61
151	Valerie Burt	5e7b1d074116fa004186da8e
152	Raymond Douglas	5e7b1d80c8cb152a56f4ed10
153	yangqi98	5f6826ce8866636a7c6f0fb6
154	ChenShaoWanshop	5f7eac265f080e1f50196cb8
155	HANS_STORE	5f90716079e714e139856770
156	PeekWise	5f90f648529755d7f9243e1b
157	A-Z Online	5f967178b3f6484e989d7bcb
158	PeNoah	5fd9254d4eed91f7ae3703dd
159	boomtraders	5fee4297d4113e33f0ca5051
160	Creaciones Cristina Market	60d7cd1a619899ac1e8f1eaa