

4. This action has been filed by Plaintiffs to combat online counterfeiters who trade upon Plaintiffs' reputation and goodwill by selling and/or offering for sale products in connection with Plaintiffs' Twins Special Trademarks, which are covered by U.S. Trademark Registration No. 3,749,271; 4,848,711; 4,848,712; and 4,848,713 (the "TWINS Trademarks"). The registrations are valid, subsisting, unrevoked, and uncanceled. Trademark Registration Nos. 4,848,711; 4,848,712; and 4,848,713 are incontestable pursuant to 15 U.S.C. § 1065. The registrations for the trademarks constitute prima facie evidence of validity and of Plaintiffs' exclusive right to use the trademarks