

3. This action has been filed by Plaintiff to combat online counterfeiters who trade upon Plaintiff's reputation and goodwill by selling and/or offering for sale products in connection with Plaintiff's MOTÖRHEAD trademarks, which are covered by U.S. Trademark Registration Nos. 3,041,455; 3,041,456; 3,492,601; and 4,554,060 (collectively, the "MOTÖRHEAD Trademarks"). Global is the exclusive licensee of the MOTÖRHEAD Trademarks. The Registrations are valid, subsisting, and in full force and effect. A true and correct copy of the federal trademark registration certificate for each of the marks are attached hereto as **Exhibit 1**.