

¶ 10. Plaintiff has and continues to widely market and promote the ROKU word, ROKU & Design, DESIGN only, ROKU TOUCH, STREAMBAR, STREAMING STICK, and ROKU TV READY trademarks (together, the “ROKU Trademarks”) in the industry and to consumers. *Id.* Plaintiff’s promotional efforts include—by way of example but not limitation—substantial print media, the ROKU website and social media sites, and point of sale materials. Long before Defendants’ acts described herein, Plaintiff launched the ROKU brand products and obtained U.S. Trademark Registration Nos.: 5886527, 4937513, 3177666, and 7297802 for the ROKU word Trademark, U.S. Trademark Registration No.: 4937514 for the ROKU Stylized Trademark, U.S. Trademark Registration Nos.: 5151588, 4937515, 4286059, and 4286058 for the ROKU & Design Trademarks, U.S. Trademark Registration Nos.: 4839473, 4843920, 6076830, and 7313082 for

the Design Only Trademarks, U.S. Trademark Registration No.: 5886526 for the ROKU TOUCH Trademark, U.S. Trademark Registration No.: 4618984 for the STREAMING STICK Trademark, U.S. Trademark Registration No.: 6464718 for the STREAMBAR Trademark, U.S. Trademark Registration No. 6860039 for the ROKU TV READY & Design Trademark, and U.S. Trademark Registration No. 6992108 for ROKU TV READY word Trademark. *See id.* at ¶ 1. The U.S. registrations for the ROKU Trademarks are valid, subsisting, and in full force and effect. *Id.*