



9. This action has been filed to combat online trademark and copyright infringers who trade upon Plaintiff's reputation and goodwill and valuable intellectual property by selling and/or offering for sale unauthorized and infringing versions of the ANNE STOKES Products in violation of Plaintiff's federally registered Mark and Works.

10. Art Ask Agency is the current owner of several copyright registrations including, but not limited to, the following Copyright Registration Nos. asserted in this action VA 2-261-829, VA 2-272-075, VA 2-272-273, VA 2-271-514, VA 2-271-652, VA 2-152-063, VA 2-272-041, VA 2-272-210, VA 2-272-043, VA 2-271-518, VA 2-152-064, VA 2-152-067, VA 2-152-057, VA 2-152-045, VA 2-152-058, VA 2-152-068, VA 2-152-055, VA 2-152-019, VA 2-152-061, VA 2-152-065, VA 2-272-364, VA 2-329-205, VA 2-329-166, VA 2-328-699, VA 2-328-705, VA 2-328-704, VA 2-328-698, VA 2-328-696, VA 2-328-703, VA 2-328-702, VA 2-328-701, VA 2-328-700, VA 2-328-695, VA 2-328-533, VA 2-328-535, and VA 2-152-048, (collectively the "ANNE STOKES Works").

11. True and correct copies of the registration certificates for the ANNE STOKES Works are attached as Exhibit 1.

12. In addition, Art Ask Agency is the current registered owner of U.S. Trademark Registration No. 6,999,661 (the “ANNE STOKES Mark”).

13. The ANNE STOKES Mark’s registration is valid, subsisting, unrevoked, uncanceled, and incontestable pursuant to 15 U.S.C. § 1065. The registrations constitute prima facie evidence of validity and of Plaintiff’s exclusive right to use the ANNE STOKES Mark pursuant to 15 U.S.C. § 1057(b).

14. A true and correct copy of the registration certificate for the ANNE STOKES Mark asserted in this action is attached as Exhibit 2.

15. The ANNE STOKES Mark and ANNE STOKES Works have been the subject of substantial and continuous marketing and promotion by Plaintiff. Plaintiff has and continues to widely market and promote the ANNE STOKES Mark and ANNE STOKES Works in the industry and to consumers. Plaintiff’s promotional efforts include — by way of example, but not limitation — substantial print media, the ANNE STOKES website and social media sites, and point of sale materials.

16. The ANNE STOKES Mark and ANNE STOKES Works have been continuously used and have never been abandoned. The ANNE STOKES trademark and copyright registrations are valid, subsisting, and in full force and effect. The registrations of the ANNE STOKES Mark constitute prima facie evidence of their validity pursuant to 15 U.S.C. §1057(b).

17. Plaintiff has invested substantial time, money, and effort in building up, developing, advertising, and otherwise promoting the ANNE STOKES Mark and ANNE STOKES Works. As a result, products associated with the ANNE STOKES Mark and ANNE STOKES