

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KAWS INC. and KAWS STUDIO L.P.,

Plaintiffs,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS, AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE A TO THE
COMPLAINT,

Defendants.

Case No.:26-cv-03010

COMPLAINT

Jury Trial Demanded

Plaintiffs KAWS INC. and KAWS STUDIO L.P. (collectively, “Plaintiffs”), hereby allege as follows against the individuals, corporations, limited liability companies, partnerships, unincorporated associations and foreign entities identified on **Schedule A¹** to this Complaint (collectively, “Defendants”):

INTRODUCTION

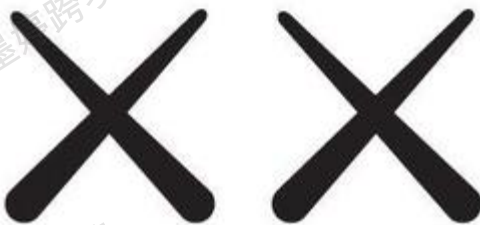
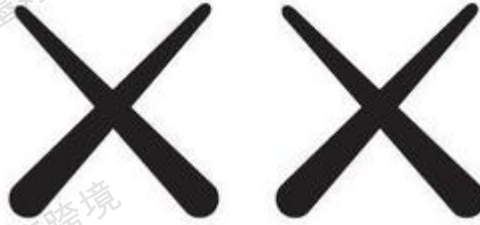
1. This action has been filed by Plaintiffs to combat online counterfeiters who trade on Plaintiffs’ reputation and goodwill by selling and/or offering for sale products in connection with Plaintiffs’ copyrights, which are covered by U.S. Copyright Office Registration Nos. VA 2-180-272 and VA 2-182-652 (the “KAWS Copyrights”); and Plaintiffs’ trademarks, which are covered by U.S. Trademark Registration Nos. 6,046,763; 6,047,656; 6,102,259; 6,116,823; 6,852,850; 6,102,260; and 6,997,015 (the “KAWS Trademarks”).

2. The KAWS Copyrights and KAWS Trademarks are valid, subsisting, and in full force and effect. True and correct copies of the federal copyright registration certificates for the

¹ Plaintiffs are filing a motion to temporarily seal Schedule A simultaneously with the filing of this Complaint.

VA 2-182-652	BFF	Dec. 12, 2019
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23. KAWS INC. owns all rights in, and KAWS STUDIO L.P. is the exclusive licensee of, the KAWS Trademarks as follows:

U.S. TM Reg. No.	Trademark	Registration Date
6,046,763	KAWS (Classes 6, 9, 14, 16, 18, 20, 25, 28) 	May 5, 2020
6,047,656	KAWS (Class 35) 	May 5, 2020
6,102,259	XX (Classes 6, 9, 18, 20, 25, 35) 	Jul. 14, 2020
6,116,823	XX (Classes 18, 25) 	Aug. 4, 2020