

III. THE PARTIES

Plaintiff

4. Plaintiff Nissan North America, Inc. is a corporation of the State of Delaware, having its principal place of business at One Nissan Way, Franklin, Tennessee 37067. Under agreement with Nissan Jidosha Kabushiki Kaisha, Plaintiff polices and enforces Nissan trademarks in the United States. Plaintiff Nissan North America, Inc. and Nissan Jidosha Kabushiki Kaisha are referred to herein together or individually as “Nissan.”

5. Since its inception in 1933, Nissan has been passionate about creating innovative technologies and products based on the spirit of “Do what others don’t dare to do.” Nissan has an impressive track record of innovations, one that has greatly impacted the auto industry and the lives of drivers worldwide. For decades, Nissan has been one of the largest automakers in the world with millions of vehicles sold to consumers yearly.

6. Propelled by its reputation and recognizable trademarks, which are carefully curated and monitored, consumers recognize Nissan and its Nissan brand as a source of reliable and quality vehicles, vehicle parts and accessories, miniature vehicles and toys, and various other lifestyle products (collectively, the “Nissan Products”).

7. Nissan has registered many of its trademarks with the United States Patent and Trademark Office. Nissan Products typically include at least one of Nissan’s registered trademarks. Nissan uses its trademarks in connection with the marketing of its Nissan Products, including the following marks which are collectively referred to as the “NISSAN Trademarks.”

Registration No.	Trademark
2,043,780	NISSAN
4,283,161	
686,587	
2,964,579	
2,047,839	