

(the “SPRUNKI Trademarks”). As a result, strong common law trademark rights have amassed in the SPRUNKI Trademarks. Plaintiff’s use of the marks has also built substantial goodwill in and to the SPRUNKI Trademarks. Plaintiff has registered the below SPRUNKI Trademarks with the United States Patent and Trademark Office.

Registration No.	Trademark
7,902,874 7,902,877	SPRUNKI

12. The above U.S. registrations for the SPRUNKI Trademarks are valid, subsisting, and in full force and effect. The registrations for the SPRUNKI Trademarks constitutes *prima facie* evidence of their validity and of Plaintiff’s exclusive right to use the SPRUNKI Trademarks pursuant to 15 U.S.C. § 1057 (b). True and correct copies of the United States Registration Certificates for the above-listed SPRUNKI Trademarks are attached hereto as **Exhibit 1**.

13. The SPRUNKI Trademarks are distinctive when applied to the Sprunki Products, signifying to the purchaser that the products come from Plaintiff and are manufactured to Plaintiff’s quality standards. Whether Plaintiff manufactures the products itself or contracts with others to do so, Plaintiff has ensured that products bearing the SPRUNKI Trademarks are manufactured to the highest quality standards.

14. The innovative marketing and product designs of the Sprunki Products have enabled the Sprunki brand to achieve widespread recognition and have made the SPRUNKI Trademarks some of the most well-known marks in the video game industry. The significant goodwill associated with the Sprunki brand has made the SPRUNKI Trademarks a valuable asset of Plaintiff.

15. Plaintiff has expended substantial time, money, and other resources in advertising and promoting the SPRUNKI Trademarks. Sprunki Products have also been the subject of

extensive unsolicited publicity resulting from their renown and innovative designs. As a result, products bearing the SPRUNKI Trademarks are widely recognized and exclusively associated by consumers, the public, and the trade as being high-quality products sourced from Plaintiff. Sprunki Products have become among the most popular of their kind. The SPRUNKI Trademarks have achieved tremendous recognition which has only added to the inherent distinctiveness of the marks. As such, the goodwill associated with the SPRUNKI Trademarks is of incalculable and inestimable value to Plaintiff.

16. The Sprunki copyrighted works (the “Sprunki Copyrighted Works”) are registered with the United States Copyright Office under “Wenda(White) and 5 Other Unpublished Works” (U.S. Copyright Registration No. VAu 1-556-801), issued by the Register of Copyrights on February 11, 2025. A true and correct copy of the certificate of registration from the U.S. Copyright Office for the above-referenced Sprunki Copyrighted Works is attached hereto as **Exhibit 2**.

17. Among the exclusive rights granted to Plaintiff under the U.S. Copyright Act are the exclusive rights to reproduce, prepare derivative works of, distribute copies of, and display the Sprunki Copyrighted Works to the public.

18. Since their first publication, the Sprunki Copyrighted Works have been used on the

19. Sprunki Products typically include one or more of the registered SPRUNKI Trademarks and/or one or more of the Sprunki Copyrighted Works. As such, Sprunki Products are recognized by the public as being exclusively associated with the Sprunki brand.

The Defendants

20. Defendants are individuals and business entities of unknown makeup who own and/or operate one or more of the e-commerce stores under at least the Seller Aliases identified on