

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

YIWU BAIMEI ELECTRONIC COMMERCE
CO., LTD.,

Plaintiff,

v.

THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A,”

Defendant.

Case No.:

COMPLAINT FOR COPYRIGHT INFRINGEMENT

Plaintiff, Yiwu Baimei Electronic Commerce Co., Ltd., a Chinese limited liability company, (“Plaintiff” or “Baimei”), brings this Complaint against The Individuals, Partnerships, and Unincorporated Associations Identified on Schedule “A” (hereinafter, collectively, “Defendant”) who are promoting, selling, offering for sale and distributing goods utilizing a series of designs covered by Plaintiff’s eight (8) U.S. Federal Copyright Registrations Nos. VA 2-270-357, VA 2-270-532, VA 2-270-548, VA 2-270-545, VA 2-270-544, VA 2-270-547, VA 2-270-546, VA 2-265-759 (hereinafter referred to collectively as “the Hollow Halloween Works”). *See* composite Exhibit One. Defendant is promoting, selling, offering for sale and distributing their products throughout this district utilizing Plaintiff’s registered designs on various Internet based e-commerce stores using the seller identities as set forth on Schedule “A” (hereinafter referred to collectively as “Seller IDs”). In support of its claims, Plaintiff alleges as follows: