

continues to be irreparably damaged through consumer confusion, dilution, and tarnishment of its valuable trademarks as a result of Defendants' actions and seeks injunctive and monetary relief.

### III. THE PARTIES

#### Plaintiff

4. Netflix owns and operates a subscription video on-demand streaming service that distributes original and acquired films and television shows from various genres and in multiple languages. Netflix surpassed 300 million subscribers globally in 2024.

5. Netflix's content offerings also include successful films such as KPop Demon Hunters (collectively, the "Netflix Titles").

6. Netflix has a team focused on consumer products and experiences. That team brings Netflix members' favorite titles to life outside of the screen by selling Netflix-branded merchandise and promoting immersive experiences that reflect the themes in the Netflix Titles. Products sold under the Netflix brand and associated with the Netflix Titles include items such as clothing, accessories, drinkware, home decor, toys, and other merchandise (collectively, the "Netflix Products"). Netflix Products are distributed and sold to consumers throughout the United States, including in Illinois, through authorized retailers and the official netflix.shop webstore.

7. Netflix Products are sold and advertised in connection with Plaintiff's house marks, which have been used in commerce for several years and are registered with the United States Patent and Trademark Office:

| Registration Number | Trademark |
|---------------------|-----------|
| 3,171,517           | NETFLIX   |
| 3,299,362           |           |
| 4,953,701           |           |
| 5,961,936           |           |
| 5,978,610           |           |
| 6,024,526           |           |
| 6,119,304           |           |

|                                                                            |                |
|----------------------------------------------------------------------------|----------------|
| 6,119,305<br>6,119,528<br>6,119,529<br>6,119,530<br>6,169,891<br>6,262,210 |                |
| 4,788,783                                                                  | <b>NETFLIX</b> |
| 5,272,903<br>7,715,384                                                     | <b>N</b>       |

8. KPop Demon Hunters is an animated musical film that follows the K-pop girl group called ‘HUNTR/X’ which is comprised of members Rumi, Mira, and Zoey. Along with their K-pop fame, the girls are also demon hunters and use their singing voices to protect against the demons. KPop Demon Hunters is currently the most-watched animated film on Netflix and is also the most popular Netflix film of all time, with more than 200 million views within the first month of its release. The film’s soundtrack has similarly garnered mass success as it became the first soundtrack to have four simultaneous Top 10 songs on the Billboard Hot 100. Some of the characters and character names made famous by the KPop Demon Hunters film include:

| Registration Number                              | Trademark          |
|--------------------------------------------------|--------------------|
| 8,186,601<br>8,186,628<br>8,186,639<br>8,186,688 | KPOP DEMON HUNTERS |

10. True and correct copies of the United States Registration Certificates for the trademarks listed in the tables above (collectively, the “Netflix Trademarks”) are attached hereto as **Exhibit 1**.

11. The U.S. registrations for the Netflix Trademarks are valid, subsisting, in full force and effect, and some are incontestable pursuant to 15 U.S.C. § 1065. The registrations for the Netflix Trademarks constitute *prima facie* evidence of their validity and of Plaintiff’s exclusive right to use the Netflix Trademarks pursuant to 15 U.S.C. § 1057(b).

12. The Netflix Trademarks are distinctive when applied to the Netflix Products, signifying to the consumers that the products originate from Plaintiff and are manufactured to Plaintiff’s high-quality standards. Whether Plaintiff manufactures the products itself or licenses others to do so, Plaintiff has ensured that products bearing its trademarks are manufactured to the highest quality standards.

13. The Netflix Trademarks are famous marks, as that term is used in 15 U.S.C. § 1125(c)(1) and have been continuously used and never abandoned. The innovative marketing and product designs of the Netflix Products have enabled the Netflix brand to achieve widespread recognition and fame and have made the Netflix Trademarks some of the most well-known marks in the entertainment industry. The widespread fame, outstanding reputation, and significant goodwill associated with the Netflix Titles have made the Netflix Trademarks invaluable assets of Plaintiff.