

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 6,119,528 6,119,529 6,119,530 6,169,891 6,262,210	
4,788,783	NETFLIX
5,272,903 7,715,384	N

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 8,186,628 8,186,639 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.

14. Plaintiff has expended substantial time, money and other resources in advertising and promoting the Netflix Trademarks. In fact, Plaintiff has expended millions of dollars in advertising, promoting, and marketing featuring the Netflix Trademarks. Netflix Products have also been the subject of extensive unsolicited publicity resulting from their high-quality, innovative designs. As a result, products bearing the Netflix Trademarks are widely recognized and exclusively associated by consumers, the public, and the trade as being high-quality products sourced from Plaintiff. Netflix Products have become among the most popular of their kind in the U.S. and the world. The Netflix Trademarks have achieved tremendous fame and recognition which has only added to the inherent distinctiveness of the marks. As such, the goodwill associated with the Netflix Trademarks is of incalculable and inestimable value to Plaintiff.

15. True and correct copies of the United States Registration Certificates for the copyrighted works listed above (collectively, the “Netflix Copyrighted Works”) are attached hereto as **Exhibit 2**.

16. 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 Netflix Copyrighted Works to the public.

17. Since first publication, the Netflix Copyrighted Works have been used on the featuring the Netflix Copyrighted Works are advertised on Plaintiff’s webstore at netflix.shop.

The Defendants

18. 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 Schedule A and/or other seller aliases not yet known to Plaintiff. Upon information and belief,