

of transactions and occurrences. Defendants attempt to avoid liability by going to great lengths to conceal both their identities and the full scope and interworking of their illegal infringing operation. Plaintiff is therefore forced to file this action to combat Defendants' infringement of Plaintiff's Copyrighted Subject Design, and to protect unknowing customers from purchasing unauthorized products over the Internet.

4. PYOKOPINS brings this action for willful copyright infringement and piracy committed for purposes of commercial advantage or private financial gain by the reproduction or distribution, including by electronic means, of one or more copies of copyrighted works in violation of 17 U.S.C. §501, and for all the remedies available under the Copyright Act 17 U.S.C. § 101, *et seq.*

5. This unauthorized usage constituted copyright infringement, amongst other things, as set forth below.

PARTIES

6. PYOKOPINS is an individual residing in Georgia and doing business throughout the United States and within this District.

7. PYOKOPINS owns all rights, title, and interest in the Subject Design and copyright described herein that is the subject of this action as shown in **Exhibit A** attached hereto.

8. PYOKOPINS sells thousands of products featuring its original designs every year.

9. Defendants have the capacity to be sued under Federal Rule of Civil Procedure 17(b).

10. The Defendants in **Schedule A** (collectively, "Defendants") are individuals and business entities who, upon information and belief, reside primarily in the People's Republic of China or other foreign jurisdictions. Defendants conduct business throughout the United States,

including within South Carolina and in this District, through the operation of fully interactive commercial websites and online marketplaces operating under the Defendant Internet Stores. Each Defendant targets the United States, including South Carolina, and has, upon information and belief, sold, offered for sale, and continues to sell, products containing the Subject Design to consumers within the United States and this District.

11. Defendants have purposefully directed some portion of their illegal activities towards consumers in the state of South Carolina through the advertisement, offer to sell, sale, and/or shipment of infringing goods to the State.

12. Upon information and belief, Defendants may have engaged in fraudulent conduct providing false and/or misleading information to the Internet based e-commerce platforms or domain registrar where they offer to sell and/or sell infringing products.

13. Upon information and belief, Defendants will likely continue sell and offer for sale products containing PYOKOPINS's Subject Design, namely products featuring in whole, or in part, the Subject Design, or unauthorized derivatives thereof (collectively, the "Infringing Products") unless preliminarily and permanently enjoined.

14. Defendants use their Internet-based businesses to infringe the intellectual property rights of PYOKOPINS and others.

15. Defendants, through the sale and offer to sell infringing products, are directly, and unfairly, competing with PYOKOPINS' economic interests in the state of South Carolina and causing PYOKOPINS harm and damage within this jurisdiction. The Infringing Products are shown in **Exhibit B** attached hereto.