

III. THE PARTIES

Plaintiff

4. Plaintiff Kia Corporation is a Korean corporation with its principal place of business located at 12 Heolleung-ro Seocho-gu Seoul 06797, Republic of Korea.

5. Kia Corporation was founded in 1944 and has risen to be one of the most preeminent automotive brands in the world. Kia is one of the largest producers of automotive vehicles in the world, with significant volume of vehicles sales globally, resulting in substantial revenue. Kia America, Inc., a subsidiary of Kia Corporation, has operated in the United States for over thirty years and handles sales, distribution, and related business activities in the United States.

6. Kia offers several models in its lineup, including, but not limited to, Sportage, Seltos, Sorento, Telluride, Carnival, EV9, and more.

7. Propelled by its reputation and recognizable trademarks, which are carefully curated and monitored, consumers recognize Plaintiff and the Kia brand as a source of reliable and quality vehicles, vehicle parts, and accessories (collectively, the “Kia Products”). Kia has registered many of the Kia trademarks with the United States Patent and Trademark Office. Kia Products typically include at least one of Kia’s registered trademarks. Kia uses its trademarks in connection with the marketing of its Kia Products, including the following marks which are collectively referred to as the “Kia Trademarks.”

Registration No.	Trademark
7,209,657	KIA
7,256,870	
7,209,646	
7,215,526	
7,215,527	
7,215,510	
7,209,648	
7,215,521	
1,723,608	

Registration No.	Trademark
3,209,737	CARENS
8,168,218	EV6
6,259,214	K4
6,411,905	K5
6,162,187	K7
5,061,428	NIRO
2,748,779	SORENTO
3,473,433	SOUL
1,810,658	SPORTAGE
5,454,609	STINGER
6,248,142 6,874,542 6,303,302 6,248,140 6,733,895 6,681,487 6,248,146	
6,952,085 7,077,577 7,095,531	 Movement that inspires
5,273,518 2,351,320 5,752,402	
3,867,593	
6,613,141 7,238,862	
6,613,144 7,821,450	
5,461,792	