

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 include successful television shows such as Stranger Things (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. Stranger Things is a Netflix original television series set in the 1980s and centered around the residents of the fictional town of Hawkins, Indiana. A nearby laboratory secretly performed experiments with the paranormal and supernatural, leading Eleven, a young girl with psychokinetic abilities, to inadvertently create a portal to an alternate dimension referred to as the ‘Upside Down’. Throughout the series, the characters refer to and interact with a local restaurant chain called ‘Surfer Boy Pizza,’ which becomes integral to the core characters’ rescue mission in later seasons. Plaintiff has used the famous Stranger Things name for many years and has registered the following marks with the United States Patent and Trademark Office:

| Registration Number                                                                                               | Trademark       |
|-------------------------------------------------------------------------------------------------------------------|-----------------|
| 5,449,306<br>5,908,495<br>5,921,292<br>5,926,913<br>5,926,914<br>5,926,996<br>6,013,979<br>6,029,505<br>6,029,506 | STRANGER THINGS |

|                                                  |                                                                                    |
|--------------------------------------------------|------------------------------------------------------------------------------------|
| 6,059,008<br>6,071,244<br>6,739,704<br>7,778,813 |                                                                                    |
| 6,616,267                                        |  |
| 7,271,840<br>7,931,072                           | SURFER BOY PIZZA                                                                   |

9. Copyrighted works associated with the Stranger Things television series are also registered with the United States Copyright Office. The registrations include but are not limited to “Stranger Things Hellfire Club Part 2 Style Guide.” (Reg. No. VAu001535325) and “Stranger Things Scoops Ahoy Packaging and Retail Guide.” (Reg. No. VAu001534105). The Hellfire Club, as depicted in Season 4, is a club comprised of several of the Stranger Things main characters. The members of the Hellfire Club create and wear club shirts which feature the club’s name and logo. Similarly, Scoops Ahoy, a critical location to the plot of Season 3, is a local nautical-themed ice cream parlor where two characters work over summer break dressed in on-theme costumes. The copyrighted works include

| Stranger Things Hellfire Club                                                       | Stranger Things Scoops Ahoy                                                          |
|-------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|
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