

III. INTRODUCTION

10. Plaintiff files this action to combat online infringers and counterfeiters who trade upon Plaintiff's reputation and goodwill by selling and/or offering for sale unauthorized and unlicensed counterfeit and infringing products using counterfeit versions of Plaintiff's federally registered trademarks POPSOCKETS (U.S. Reg. 5,486,563), PopGrip (U.S. Reg. 5,757,735)



(U.S. Reg. 6,005,170),



(U.S. Reg. 6,005,169) (collectively, the

“POPSOCKET Trademarks”) in connection with the sale and advertising of counterfeit products.

See **Exhibit 1**. Like many other intellectual property right owners, Plaintiff suffers ongoing daily and sustained violation of its intellectual property rights at the hands of infringers, such as