

ownership or are part of a group of coordinated sellers. In order to obtain identifying ownership information, Plaintiff must seek discovery from the online marketplaces on which the Defendant Internet Stores operate. It is only then that Plaintiff will discover the true identity or identities of the individuals and/or entities operating the Defendant Internet Stores.

8. Given the similarities between the Defendant Internet Stores, and the likelihood of common ownership or coordination, and for purposes of judicial efficiency, Plaintiff asserts that joinder of all Defendants is proper at this stage as severing the case would mean that multiple stores with the same operator would be adjudicated piecemeal and/or would need to be re-joined at a later date.

INTRODUCTION

9. This action has been filed to combat the online trademark infringement and counterfeiting activity of Defendants, who trade upon Plaintiff's valuable federally registered trademarks by promoting and selling infringing and counterfeit products associated therewith.

10. Plaintiff is the owner of the federally registered trademarks associated with its Victoria's Secret brand, which are listed in the table below, and true and correct copies of which are attached hereto as **Exhibit 1** (collectively, "VS Trademarks").

TRADEMARKS			
REG. NO.	MARK	CLASS(ES) OF GOODS & SERVICES	REG. DATE
4118910	VS	IC 025: Clothing, namely, bras; panties; pajamas; lingerie, robes; slippers.; IC 003: Personal care products, namely, body lotions; body mist; shower gel; eau de parfum; scented body powder.	Sep. 21, 2010
1146199	VICTORIA'S SECRET	IC 025: Women's Lingerie.	Oct. 04, 2005
1908042	VICTORIA'S SECRET	IC 020: [picture frames,] hand mirrors and pillows.; IC 021: [perfume atomizers sold empty; perfume bottles sold empty;] non-metal decorative boxes; hair combs and hair brushes; decorative trays not of precious metal [; and flasks sold empty]; IC 022: mesh lingerie bags for washing lingerie [and cloth bags for lingerie storage]; IC 024: [wash cloths,] towels [and bedding, namely, comforters, pillow cases, sheets, shams, duvets, and dust ruffles]; IC 025: women's [and men's] outerwear,	Sep. 26, 2006

TRADEMARKS			
REG. NO.	MARK	CLASS(ES) OF GOODS & SERVICES	REG. DATE
		underwear and nightwear, namely, lingerie, robes, caftans, kimonos, boxer shorts, pajamas, shirts, pants, [jeans,] dresses, skirts, sweaters, jumpsuits, bodysuits, sweatshirts, jackets, T-shirts, [scarves, leotards,] tights, swimsuits, beach shirts, hosiery, footwear.; IC 028: [[toy stuffed animals]]; IC 016: mail order catalogs featuring clothing, lingerie, and toiletries [; bridal guest books; calendars, and address books]; IC 042: retail store and mail order catalog...	
5915222	DREAM ANGEL	IC 003: Perfumes; Fragranced body care preparations, namely, shower cream, body lotion, body oil; Non-medicated skin care preparation, namely, body mist.	Sep. 15, 2020
5583196	VICTORIA'S SECRET AQUA KISS	IC 003: [Body cream;] Body lotion; Body sprays; Fragrances; [Hand cream;] Non-medicated skin care preparation, namely, body mist; all the aforesaid goods sold exclusively through Victoria's Secret stores and websites.	Nov. 08, 2005
5488305	BOMBSHELL SEDUCTION	IC 003: [Body cream;] Body lotion; Body sprays; [Body wash;] Eau de Parfum; [Eau de toilette;] Fragrances; Perfume; Non-medicated skin care preparation, namely, body mist.	Nov. 01, 2005
4648957	VICTORIA'S SECRET BOMBSHELL	IC 003: Body lotion; [Body powder;] Body sprays; [Body wash;] Eau de parfum; Non-medicated skin care preparation, namely, body mist.	Mar. 07, 2017
5633007	VELVET PETALS	IC 003: Non-medicated skin care preparation, namely, body mist; scented body spray; body lotion.	Dec. 18, 2018
5156255	BOMBSHELL	IC 003: Fragrances.	Dec. 02, 2014
3011494	VANILLA LACE	IC 003: personal care products, namely, body scrub, [bubble bath, cologne,] cream for the body, cream for the hands, exfoliators for the skin, [face scrub,] fragrant body splash, fragrant body mist, [hair conditioner, hair shampoo, hair spray, hair styling gel, hair styling mousse,] lotion for the body, perfume, [powder for the body,] shower gel, soap for the body[, soap for the face and soap for the hands].	Jun. 05, 2018
3013416	AMBER ROMANCE	IC 003: personal care products, namely, [body scrub, bubble bath, cologne,] [cream for the body, cream for the hands,][exfoliators for the skin, face scrub,] [fragrant body splash,] fragrant body mist, [hair conditioner, hair shampoo, hair spray, hair styling gel, hair styling mousse,]lotion for the body, [perfume, powder for the body] [, shower gel,] [soap for the body, soap for the face and soap for the hands].	Oct. 16, 2018
6153305	BARE VANILLA	IC 003: Body lotion; Non-medicated skin care preparation, namely, body mist; Scented body spray.	Nov. 19, 2019
3148825	PURE SEDUCTION	IC 003: personal care products, namely, [body scrub, bubble bath, cologne, cream for the body, cream for the hands, exfoliators for the skin, face scrub, fragrant body splash,] fragrant body mist, [hair conditioner, hair shampoo, hair spray, hair styling gel, hair styling mousse, lotion for the body,] perfume, [powder for the body, shower gel, soap for the body, soap for the face and soap for the hands; toiletries, namely, soap, body splash,] hand and body cream, [bubble bath,] body lotion, [body talc] and shower gel.	Aug. 01, 1995
3004519	LOVE SPELL	IC 003: personal care products, namely, [body scrub,] [bubble bath,] [cologne,]cream for the body, CREAM FOR THE HANDS, [exfoliators	Jan. 20, 1981