

10. To be able to offer the competing products at a price substantially below the cost of the original, while still being able to turn a profit after absorbing the cost of manufacturing, advertising, and shipping requires an economy of scale only achievable through a cooperative effort throughout the supply chain.

III. THE PARTIES

11. Plaintiff is the owner of numerous Group Registrations of Published Photographs specifically United States Copyright Registration Nos. VA0002435304, VA0002438066, VA0002439005, VA0002438881, VA0002417360, VA0002434996, VA0002416185, VA0002435965, VA0002464561, VA0002459758, VA0002438935, VA0002435033. True and correct copies of the registration certificates are attached hereto as **Exhibit 1**. Upon information and belief, the copyrights have effective dates that predate the Defendants' acts of copyright infringement. The Registrations are valid, subsisting, and in full force and effect.

12. Plaintiff owns the Copyright Registration of the Copyright Protected Photographs in order to protect the creative content of those same Photographs. Plaintiff is a Hong Kong based, women's fashion brand, operating under the Rotita brand, with international reach. The Copyright Protected Photographs are used to advertise, market, and otherwise promote Plaintiff's products. The Copyright Protected Photographs are carefully composed with the intention of attracting consumer interest and effectively showcasing various categories of clothing, such as dresses, swimsuits, tops, pants, jumpsuits, and accessories.

13. Plaintiff has invested significant time, resources, and effort in building consumer awareness, goodwill, and brand recognition for its products, which are advertised and marketed using the Copyright Protected Photographs.