

Plaintiff's reputation and goodwill and valuable intellectual property by selling and/or offering for sale unauthorized and infringing versions of the NASCAR Products in violation of Plaintiff's federally registered trademarks.

10. Plaintiff NASCAR is the registered owner of numerous trademark registrations, including U.S. Trademark Registration Nos. 1,850,527; 1,908,112; 5,388,088; and 5,578,788 (the "NASCAR Marks"), which are at issue in this action:

Trademark	Registration No.	Goods Covered
	1,850,527	CLASS 6: key chains and license plates of common metals; CLASS 9: scientific apparatus; namely, sunglasses and walkie talkies; CLASS 14: precious metals; namely, silver medallions, pins, and wrist watches; CLASS 16: paper articles; namely, bumper stickers, calendars, counter units for trading cards, decals, book covers, memo pads, pens, pencils, mounted photographs, decals, trading cards, graphic applications for automobiles, trading card albums; CLASS 18: leather and leather imitations; namely, back packs, credential holders, wallets, and luggage; CLASS 21: household utensils; namely, mugs, shot glasses, drinking glasses, decanters, and plastic sport bottles;

Trademark	Registration No.	Goods Covered
		CLASS 24: textile goods; namely, beach towels, blankets, cloth banners, laminated banners, laminated signs; CLASS 25: clothing; namely, caps, baseball hats, sweat shirts, sweat pants, footwear, golf shirts, jackets, knit caps, pants, shorts, straw hats, sweaters, tank tops, T-shirts, and visors; CLASS 28: games and playthings; namely, board games, die cast miniature cars, die cast miniature trucks, electronic driving games, electronic road racing sets, electronic slot cars, plastic action figures, plastic model cars, plush stuffed animals, puzzles, radio control cars and wrist racers; CLASS 30: edible goods; namely, chocolate candy bars
NASCAR	1,908,112	CLASS 6: common metals; namely, key chains, license plates and pins; CLASS 9: scientific apparatus; namely, sunglasses and walkie talkies; CLASS 14: precious metals; namely, silver medallions, bronze medallions and wrist watches; CLASS 16: Paper articles, namely, bumper stickers, calendars, display counter units for trading cards, decals, pens, mounted and unmounted photographs, notebooks, trading cards and laminated signs; CLASS 18: leather and leather imitations; namely, back packs,

Trademark	Registration No.	Goods Covered
		credential holders, wallets, fanny packs; CLASS 21: household utensils; namely, mugs, shot glasses, drinking glasses and plastic sport bottles; CLASS 24: textile goods; namely, beach towels, blankets; cloth banners; CLASS 25: clothing; namely, caps, baseball hats, sweat shirts, sweat pants, footwear, golf shirts, jackets, knit caps, pants, vests, shorts, straw hats, sweaters, tank tops, T-shirts and visors CLASS 28: games and playthings; namely, board games, die cast miniature cars, die cast miniature trucks, plush stuffed animals; CLASS 30: edible goods; namely, chocolate candy bars and cookies
	5,388,088	CLASS 25: Clothing, namely, caps, hats, baseball hats, straw hats, visors, tops, collared shirts, sport shirts, golf shirts, t-shirts, tank tops, sweaters, sweat shirts, jackets, coats, rainwear, sweat pants, pants, shorts, nightgowns, pajamas, robes, vests, socks, belts, shoes, and footwear
	5,578,788	CLASS 25: Clothing, namely, caps, hats, baseball hats, headwear, visors, tops, collared shirts, sports shirts, golf shirts, t-shirts, tank tops, sweaters, sweat-shirts, jackets

11. The federal registrations for the NASCAR Marks are valid, subsisting, unrevoked, uncanceled, and incontestable pursuant to 15 U.S.C. § 1065. The registrations constitute prima