

popular, driven, in part, by Volkswagen AG's quality standards and innovative design. Among the purchasing public, genuine Volkswagen Products are instantly recognizable as such and symbolize high quality.

7. Plaintiff distributes and sells Volkswagen Products through a network of licensed Volkswagen dealerships, who then sell to consumers throughout the United States, including through several licensed Volkswagen dealerships in Illinois. Since at least as early as 1994, Plaintiff also operates websites, including vw.com, through which consumers can purchase genuine Volkswagen parts, automotive accessories, and personal goods and accessories.

8. Volkswagen AG incorporates a variety of distinctive marks in the design of its various Volkswagen Products and uses its trademarks in connection with the marketing of its Volkswagen Products. Under agreement with Volkswagen AG, Plaintiff uses the trademarks in connection with the marketing of Volkswagen Products in the United States. Volkswagen AG is the exclusive owner of numerous federally-registered trademarks for automobiles, parts, accessories, and a long list of related services and merchandise, including the following marks which are collectively referred to as the "Volkswagen Trademarks." The Volkswagen Trademarks cover automobile parts and accessories, including, but not limited to, automobile emblems, floor mats, and parts and accessories for vehicle lighting.

Registration No.	Trademark
2,835,662	VOLKSWAGEN
2,818,615	VW
3,431,414	TIGUAN
2,682,428	TOUAREG
2,528,763	BEETLE
2,411,743	JETTA
1,540,381	GTI

1,468,206	PASSAT
1,361,724	GOLF
3,155,730; 3,315,029	TDI
2,987,620	
2,849,974	
2,100,963	
3,850,256	
3,864,460	

9. The Volkswagen Trademarks have been used exclusively and continuously by Plaintiff within the United States for many years, and have never been abandoned. The above U.S. registrations for the Volkswagen Trademarks are valid, subsisting, in full force and effect, and many are incontestable pursuant to 15 U.S.C. § 1065. True and correct copies of the United States