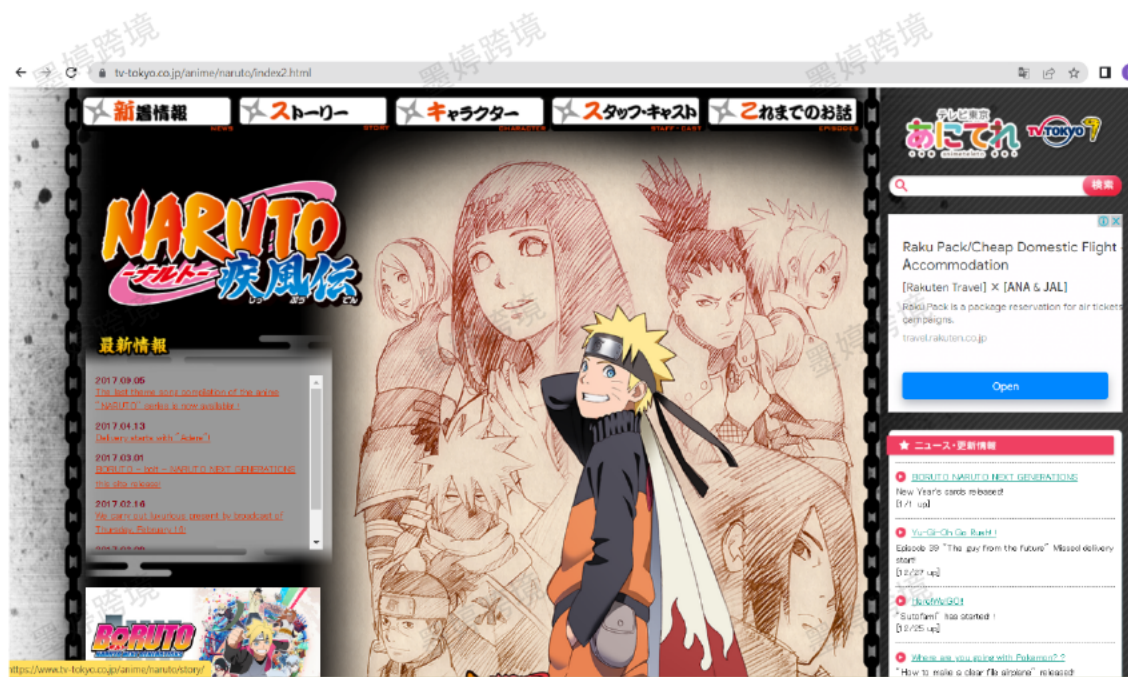




9. This action has been filed to combat online trademark and copyright infringers who trade upon Plaintiff's reputation and goodwill and valuable intellectual property by selling and/or offering for sale products, hereinafter referred to as the "NARUTO Products" in connection with the federally registered trademarks and copyrights.

10. Plaintiff TV TOKYO is the exclusive licensee of U.S. Trademark Registration Nos. 2,953,009; 3,280,366; 3,726,754; 3,229,574; 4,485,182; and 5,612,754 (the "NARUTO Marks").

Trademark	Registration No.	Goods and Services
NARUTO	3,726,754	For: Pre-recorded motion picture films and television programs featuring animated performances recorded on video and audio discs, and DVDs; pre-recorded video and audio discs, and DVDs, all featuring music and animated performances; musical video recordings and musical sound recordings featuring music and animated performances; computer game software; pre-recorded video and audio discs, DVDs featuring games; video game software; downloadable game software; downloadable computer games; computer game software and manuals sold as

		a unit; interactive video game programs; video game software; interactive computer game programs; software for playing video games; computer video game software and manuals sold as a unit; interactive entertainment software for playing video games; downloadable computer game software; downloadable interactive entertainment software for playing computer games in Class 009. For: Publications, namely, graphic novels, fiction books, comic books, comic magazines, magazines related to animated fiction, art books, children's books, children's story books, coloring books, and printed instructional manuals and strategy guides in the field of animated entertainment and computer games; school and office supplies, namely, pens, pencils and markers; calendars; notebooks; posters; school and office supplies; stationery and stationery type portfolios; sticker books and stickers; trading cards; collectible cards; printed art scrolls in Class 016. For: Men's, women's, and children's clothing, namely, shirts, t-shirts, sweatshirts, vests, wristbands; outerwear, namely, jackets, gloves; headwear, namely, hats, caps, head bands; neckwear; loungewear, namely, pajamas, nightshirts; undergarments, namely, underwear and boxer shorts; masquerade costumes, masquerade costumes with masks sold in connection therewith in Class 025. For: Toys, namely, play figures and accessories therefor, toy action figures and accessories therefor, toy figures, toy statuettes and toy figurines made of molded plastic, cases for play accessories, mechanical action toys, dolls and accessories therefor, doll play sets, doll clothing and costumes, play sets for action figures, role-playing game sets, plush toys, stuffed toys, card games, collectable card games, playing cards, toy swords, target
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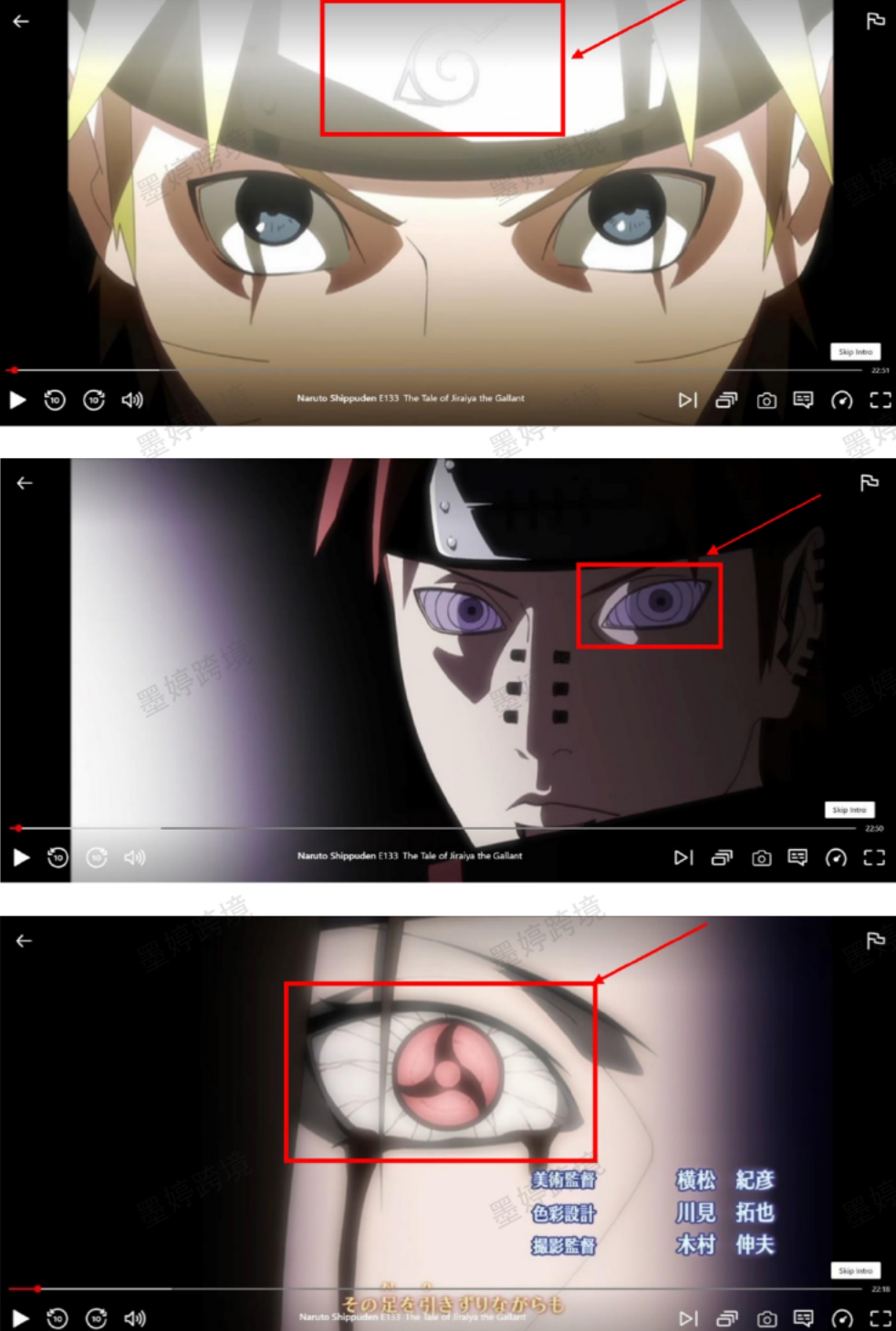
		games, action skill games, collectable game cards and trading game cards in Class 028. For: Entertainment services, namely, production and distribution of motion pictures, films and television programs, in the fields of animated entertainment; entertainment services, namely, distribution of animated audio-visual works via the internet and television; publication of books, magazines, cartoons, comic strips and comic books; fan club services; electronic game services provided on-line from databases or web sites on the Internet; providing online electronic publications, namely, newsletters, graphic novels, fiction books, and comic books, in the fields of comics, graphic novels, and animated entertainment; production of animated entertainment, namely, motion pictures and television programs; providing comics via the Internet; providing non-downloadable games via the Internet; providing information online regarding animated entertainment, computer games and comics in Class 041.
NARUTO	3,280,366	Stationery in Class 016; hand-operated action toys; toy action figures; dolls; and card games in Class 028; Entertainment services, namely, providing comics via the Internet, providing non-downloadable games via the Internet; providing information on-line relating to computer games and comics in Class 041
NARUTO	2,953,009	Comic books in Class 016.
NARUTO	3,229,574	Pre-recorded DVDs featuring animated performances, video game DVDs and video game discs in Class 009; Graphic novel, printed art scroll in Class 016;

		T-shirts, sweatshirts, jackets, headbands, caps, underwear, wristbands, gloves in Class 025.
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11. The NARUTO Marks registrations are valid, subsisting, unrevoked, uncanceled, and incontestable pursuant to 15 U.S.C. § 1065. The registrations constitute prima facie evidence of validity and of Plaintiff's exclusive right to use the NARUTO Marks pursuant to 15 U.S.C. § 1057(b).

12. True and correct copies of the registration certificates for the NARUTO Marks are attached as Exhibit 1.

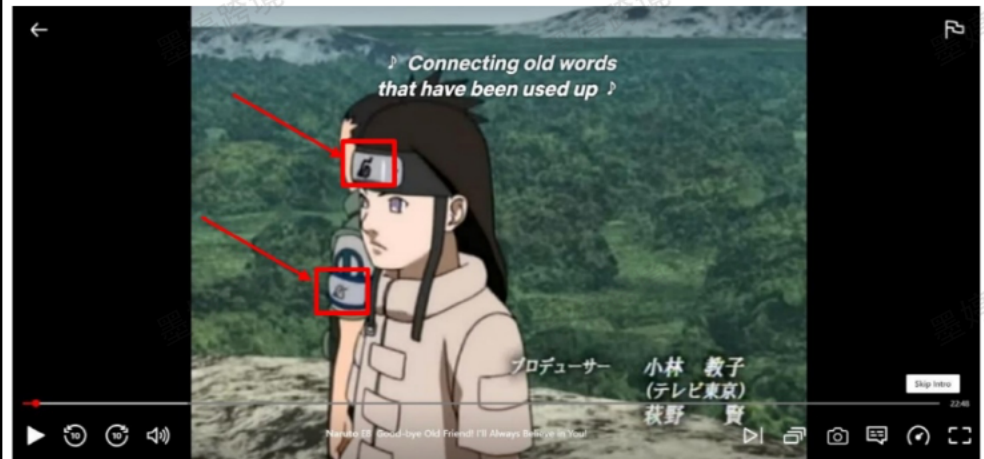
13. In addition, TV Tokyo is the current owner of several copyright registrations including, but not limited to, the following Copyright Registration Nos. TV TOKYO is the owner of the following Copyright Registration Nos. PA00002277887; PA00002431062; and PA00002276002 (collectively the "NARUTO Works").

	Plaintiff's Registered Works
Title of Work	Screenshots That Contain Certain Iconic Elements
NARUTO (#353): The Tale of Jiraiya the Gallant Reg number (PA 2-276-002) First Published (October 29, 2009)	 The first screenshot shows a close-up of Naruto's face with a red box highlighting the Konoha symbol on his forehead. The second screenshot shows a close-up of Sasuke's face with a red box highlighting his Sharingan eye. The third screenshot shows a close-up of Sasuke's eye with a red box highlighting the Sharingan symbol. Each screenshot includes a red arrow pointing to the highlighted element.

NARUTO (#114):
Good-Bye Old
Friend...! I'll Always
Believe You!

Reg number
(PA 2-277-887)

First Published
(December 15, 2004)



NARUTO Enter:
Naruto Uzumaki!

Reg number
(PA 2-431-062)

First Published
(February 15, 2007)

