

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RYZE, INC.,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS, AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE A TO THE
COMPLAINT,

Defendants.

Case No. 26-cv-02688

COMPLAINT

Jury Trial Demanded

Plaintiff RYZE, INC. (“Plaintiff”), hereby alleges as follows against the individuals, corporations, limited liability companies, partnerships, and unincorporated associations and foreign entities identified on Schedule A¹ to this Complaint (collectively, “Defendants”):

INTRODUCTION

1. This action has been filed by Plaintiff to combat online counterfeiters who trade on Plaintiff’s reputation and goodwill by selling and/or offering for sale products in connection with Plaintiff’s copyrights, which are covered by U.S. Copyright Office Registration Nos. VA 2-412-266, VA 2-412-367, and VA 2-412-368 (the “RYZE Copyrights”); and Plaintiff’s trademark, which is covered by U.S. Trademark Registration No. 7,408,961 (the “RYZE Trademark”).

2. The RYZE Copyrights and Trademark are valid, subsisting, and in full force and effect. True and correct copies of the federal copyright registration certificates for the RYZE

¹ Plaintiff is filing a motion to temporarily seal Schedule A simultaneously with the filing of this Complaint.

Defendant operates, uses to communicate with Defendants regarding their listings for Counterfeit Products, and to place orders for, receive invoices for, and purchase Counterfeit Products for delivery in the United States, including New York and this Judicial District, as a means for establishing regular business with the United States, including New York and this Judicial District.

18. Defendants have transacted business with consumers located in the United States, including New York and this Judicial District, for the sale and shipment of Counterfeit Products.

19. Venue is proper in this Court pursuant to at least 28 U.S.C. §§ 1391(b)(2) and 1400(a) because Defendants have committed acts of trademark and copyright infringement in this Judicial District and do substantial business in this Judicial District.

THE PLAINTIFF

20. Plaintiff RYZE is a corporation organized under the laws of Delaware with its principal place of business in Boston, Massachusetts.

21. Plaintiff is the registered owner of the RYZE Copyrights (attached as Exhibit 1), as follows:

Copyright Reg. No.	Copyright	Registration Date
VA 2-412-266	RYZ-1 Packaging	September 11, 2024
VA 2-412-367	RYZ-5 Packaging	September 12, 2024
VA 2-412-368	RYZ-2 Packaging	September 12, 2024

22. Plaintiff is the registered owner of the RYZE Trademark (attached as Exhibit 2), as follows:

U.S. TM Reg. No.	Trademark	Registration Date
7,408,961	RYZE SUPERFOODS (Class 5)	June 4, 2024

THE DEFENDANTS

23. Defendants are individuals and business entities who, upon information and belief, reside mainly in the People's Republic of China or other foreign jurisdictions.