

		HAMIEW Healthy Diabetes Meal Guide Chart with Portion Plate HAMIEW Mediterranean Diet Food List Chart HAMIEW Mediterranean Diet Recipes Chart HAMIEW Mediterranean Meal Plan Chart with Foods Guide HAMIEW Kidney Friendly Food List Chart HAMIEW Kidney Friendly Meal Plan Chart HAMIEW Anti-inflammatory Food Guide Chart HAMIEW FODMAP Food List Chart
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15. Plaintiff is also the owner of the following trademark:

Trademark and Reg. No.	Registration Date	First Use Date	Classes
HAMIEW (Reg. No. 7596000)	12/10/2024	9/10/2024	IC 016 - Primary Class for Bond paper; Calligraphy paper; Corkboard pins; Corrugated paper panels laminated with bleached white paper primarily for application of printed media for further use in signage applications; Craft paper; Drawing pins; Envelope paper; Gift cards of paper, not encoded; Illustration paper; Label paper; Letterhead paper; Paper doilies; Paper gift cards; Paper gift tags; Paper labels; Paper notebooks; Postcard paper; Printed calendars; Printed daily planners; Printed greeting cards; Printed posters; Push pins; Stickers; Wax paper.

16. Plaintiff has all exclusive rights in and to the Copyrighted Works and the Mark, and controls all licenses to advertise, distribute, sell products incorporating the Copyrighted Works

and/or the Mark, as well as to enforce its rights to the Copyrighted Works and the Mark.

17. Long before Defendants began their infringing activities complained of herein, the Copyrighted Works and the Mark were used by Plaintiff in interstate commerce to identify and distinguish Plaintiff's series and associated merchandise for an extended period.

18. Plaintiff has expended substantial time, money, and other resources developing, advertising, and otherwise promoting the Copyrighted Works and Mark and products bearing the Copyrighted Works and Mark. The Mark qualifies as "famous mark" as that term is used in 15 U.S.C. §1125(c)(1).

19. As a result of Plaintiff's efforts, members of the consuming public readily identify products and merchandise incorporating the Copyrighted Works and/or bearing or sold using the Mark as being high-quality goods created, sponsored, and approved by Plaintiff.

20. The Mark serves as a symbol of Plaintiff's quality, reputation, and goodwill and has never been abandoned.

21. To combat the cascading harm caused by the combined actions of Defendants and others engaging in similar conduct, Plaintiff has expended significant amounts of resources in connection with trademark and copyright enforcement efforts, including legal fees, investigative fees, and support mechanisms for law enforcement. Absent decisive and immediate corrective action to enforce its intellectual property rights in the United States, Plaintiff is without an effective remedy to stop the counterfeiting operations and recover its lost profits and damages to the brand's reputation.

Defendants' Counterfeiting and Infringing Conduct

22. Defendants are not the developers of the Dietary Guides, and are not licensed or in any way permitted to promote, sell, reproduce, offer for sale, or distribute counterfeit copies of the