

II. INTRODUCTION

3. Plaintiff filed this action to combat online infringers and counterfeiters who trade upon Plaintiff's reputation and goodwill by (1) making, using, offering for sale, selling, and/or importing into the United States for subsequent sale or use of unauthorized and unlicensed products that infringe Plaintiff's design patent (U.S. Patent No. D982,233) ("BLEND FREN D Design") and/or (2) using Plaintiff's copyrighted work (U.S. Reg. No. VA 2-425-141) ("BLEND FREN D Work") in connection with the sale and advertising of knockoff products. *See **Exhibit 1***.

Like many other intellectual property right owners, Plaintiff suffers ongoing daily and sustained violation of its intellectual property rights at the hands of infringers, such as Defendants herein.

The Defendants created internet stores (the "Defendant Internet Stores" or the "Stores") for the