

3. Plaintiff advertises its products through associated photographs of models wearing each of its popular swimsuits.

4. At issue in this case are photographs registered with the United States Copyright Office under registrations VA 2-478-310, VA 2-478-311, and VA 2-478-312, and (“Copyrighted Works”).

5. Plaintiff has brought this action to combat online infringers who trade upon Plaintiff’s reputation and goodwill by utilizing unauthorized, unlicensed, and infringing versions of Plaintiff’s Copyrighted Works to sell and/or offer for sale various competing products (the “Infringing Products”).

6. Plaintiff conducted an Internet inquiry and discovered that the Defendants were selling Infringing Products utilizing infringing copies of the Copyrighted Works that were displayed or advertised alongside the Infringing Products, despite having no license or authorization to use the Copyrighted Works.

7. Defendants have offered for sale, sold, and distributed the Infringing Products within this district and throughout the United States by operating an e-commerce store using the Store Name [REDACTED] (the “Seller Alias”).

8. Plaintiff has been and continues to be irreparably harmed by Defendants’