

Reg. Number	Title of Work	Copyrighted Work	Defendants' Images
VA 2-450-788	Three Wolves in the Night Forest		 Defs #: 1-20, 83-100
VA 2-450-786	Wolf Howling at the Moon, on a Blue Background		 Defs #: 21-39, 101-116
VA 2-450-777	Two Dolphins in Love in Hearts on a Purple Background		 Defs #: 40-56, 80, 117

Reg. Number	Title of Work	Copyrighted Work	Defendants' Images
VA 2-450-778	Two Dolphins in Love in the Sun Rays		 Defs #: 57-70, 81-82, 118-145
VA 2-450-790	Red Dragon on Glass Ball		 Defs #: 71-75, 146
VA 2-450-779	Blue Dragon on Glass Ball		 Defs #: 76-79

JURISDICTION AND VENUE

2. This Court has original subject matter jurisdiction over the claims in this action pursuant to the provisions of the Federal Copyright Act, 17 U.S.C. § 101, et seq., 28 U.S.C. § 1338(a)–(b), and 28 U.S.C. § 1331.

3. Personal jurisdiction over each Defendant satisfies constitutional due process because each Defendant has purposefully directed and expressly aimed its tortious activities at the Commonwealth of Pennsylvania and established sufficient minimum contacts with Pennsylvania by, among other things, be willing to accept an order for a product bearing Plaintiff's copyrighted designs from a representative of Plaintiff with a Pennsylvania address, be willing to ship the product to that representative in Pennsylvania, and be willing to collecting Pennsylvania sales tax. In addition, upon information and belief, each Defendant has sold additional products bearing Plaintiff's copyrighted designs to consumers within Pennsylvania not affiliated in any way with Plaintiff through the regular course of business, with the knowledge that Plaintiff is harmed in Pennsylvania as a result of its sales of infringing products to Pennsylvania residents. Plaintiff's claims arise out of and relate to Defendants' sales of infringing products bearing Plaintiff's copyrighted designs to Pennsylvania residents through the regular course of business.

4. Personal jurisdiction over each Defendant also satisfies constitutional due process because the causes of action asserted herein, including copyright infringement, are intentional torts, were aimed at Pennsylvania, and caused harm that each Defendant should have anticipated would be suffered by Plaintiff in Pennsylvania.

5. Upon information and belief, Defendants have cooperated, communicated, shared information, and coordinated their efforts in order to create an infringing marketplace operating in parallel to the legitimate marketplace of Plaintiff and third parties authorized to sell products