

11. Defendants' sale and offering for sale of infringing products to consumers in Illinois constitutes tortious conduct directed at Illinois and has caused injury to Plaintiff in this District.
12. Defendants have established sufficient minimum contacts with Illinois such that the exercise of personal jurisdiction over them comports with due process and does not offend traditional notions of fair play and substantial justice.
13. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) and (c) because Defendants are subject to personal jurisdiction in this District and a substantial part of the events giving rise to Plaintiff's claims occurred in this District.
14. Venue is also proper pursuant to 28 U.S.C. § 1391(c)(3) because, upon information and belief, certain Defendants reside outside the United States and may be sued in any judicial district.

PARTIES

Plaintiff

15. Plaintiff CosLove Inc. is a corporation organized and existing under the laws of the State of Colorado, with its principal place of business at 585 Salida Way, Aurora, Colorado 80011.
16. Plaintiff is the owner of United States Trademark Registration No. 6,489,757 for the standard character mark KONEKA in International Class 25 for apparel products (the "KONEKA Mark"). A true and correct copy of the registration certificate is attached hereto as **Exhibit 1**.
17. The KONEKA Mark is valid, subsisting, and in full force and effect on the Principal Register of the United States Patent and Trademark Office. Pursuant to 15 U.S.C. § 1057(b), the registration constitutes prima facie evidence of the validity of the mark and Plaintiff's exclusive right to use the KONEKA Mark in commerce in connection with the goods identified in the registration.