

These forum-directed activities constitute sufficient contacts with Pennsylvania and provide an independent basis for the exercise of personal jurisdiction under Pennsylvania law and Federal Rule of Civil Procedure 4(k)(1)(A).

INTRODUCTION

8. Plaintiff, LULU TO PRO, is the owner of multiple original two-dimensional pictorial works of authorship consisting of realistic illustrations depicting various food items, created for use as artwork on products (collectively, the “LULU Food Artworks”). The LULU Food Artworks were created in 2026 and are registered with the U.S. Copyright Office under Registration Nos. VAu 1-585-078 and VA 2-502-572 (the “Registrations”), which cover a group of two-dimensional pictorial works and identify Plaintiff as the author and claimant. The Registrations are valid, subsisting, and in full force and effect. The Registration predates the acts of infringement alleged in this Complaint. True and correct copies of the registration certificates are attached as Exhibit 1.

9. This action has been filed by Plaintiff to combat online copyright infringers who trade upon Plaintiff's reputation, goodwill, and valuable copyrighted works. Defendants are offering for sale and selling unauthorized products that embody unauthorized copies and/or derivative works of the LULU Food Artworks.

10. In an effort to unlawfully profit from the protected works, Defendants have created and operated numerous online storefronts (the “Defendant Internet Stores”) and designed those storefronts to appear legitimate to consumers.

11. Upon information and belief, although Defendants operate under different Seller Aliases, the Defendant Internet Stores share one or more unique identifiers suggesting that Defendants are part of an interconnected operation. Such identifiers include, without limitation, common storefront design elements, similar product listings, the use of the same or substantially