

1. This action has been filed by Plaintiff to combat online counterfeiters who trade upon Plaintiff's commercial reputation and goodwill by offering for sale and/or selling unauthorized and unlicensed Batana hair oil products using Plaintiff's federally registered word mark "UEUEKOKO" (U.S. Reg. No. 7,467,712) (the "Plaintiff Mark") (see Exhibit 1). Plaintiff sells genuine Batana hair oil products under the Plaintiff Mark, including the genuine listing "Natural Batana Oil for Deep Hair Care" (the "Genuine Product") (see Exhibit 2). Defendants' listings use the Plaintiff Mark in the listing title, description and/or product images to advertise, offer for sale, and sell non-genuine Batana hair oil products that are not manufactured by, affiliated with, or authorized by Plaintiff (the "Counterfeit Products").