

Introduction

1. This action has been filed by Plaintiff to combat online counterfeiters who trade upon Plaintiff's commercial reputation and good will by offering for sale and/or selling unauthorized and unlicensed counterfeit consumer electronics and audiovisual equipment (including dash camera, USB cable, and other consumer electronics) using Plaintiff's federally registered word mark TERUNSOUL (U.S. Reg. No. 6,876,380) (the "Plaintiff Mark") (see Exhibit 1). Plaintiff sells genuine consumer electronics and audiovisual equipment under the Plaintiff Mark, including the product depicted and offered for sale on Plaintiff's authorized online storefront (the "Genuine Product"). Defendant's listings use the Plaintiff Mark in the listing title, description and/or product images to advertise, offer for sale, and sell non-genuine consumer electronics and audiovisual equipment that are not manufactured by, affiliated with, or authorized by Plaintiff (the "Counterfeit

Products’’).