

Registration Number	Trademark	Registration Date	Goods and Services
7,204,797	DISNEY STITCH	Oct. 31, 2023	For: Headphones in Class 009
7,204,796	DISNEY STITCH	Oct. 31, 2023	For: Cosmetics in Class 003
7,035,462	DISNEY STITCH	Apr. 25, 2023	For: Quilts, throws in Class 024.
7,035,461	DISNEY STITCH	Apr. 25, 2023	For: Action figures; collectable toy figures; plush toys; toy figurines in Class 028.

DEI's exclusive right to use said marks pursuant to 15 U.S.C. § 1115(b). True and correct copies of the United States Registration Certificates for the Disney Trademarks are attached hereto as **Exhibit 2**.

12. The Disney Trademarks are exclusive to DEI and are displayed extensively on Disney Stitch Products and in marketing and promotional materials. The Disney Trademarks are also distinctive when applied to Disney Stitch Products, signifying to the purchaser that the products are authorized by DEI and are manufactured according to DEI's quality, safety, and international labor standards.

13. DEI's use of the Disney Trademarks has built substantial goodwill in the Disney Trademarks. As such, the Disney Trademarks are famous marks, as that term is used in 15 U.S.C. § 1125(c)(1), and have never been abandoned. The success of the Lilo & Stitch franchise, in addition to the marketing of Disney Stitch Products, has enabled the Lilo & Stitch brand to achieve widespread recognition and fame and has made the Disney Trademarks some of the most well-known marks in the entertainment industry. The widespread fame, outstanding reputation, and significant goodwill associated with the Lilo & Stitch brand have made the Disney Trademarks valuable assets of DEI.

14. Products bearing the Disney Trademarks have been the subject of substantial and continuous marketing and promotion. DEI has marketed and promoted, and continues to market and promote, Disney Stitch Products in the industry and to consumers through traditional print website.

15. DEI has expended substantial time, money, and other resources advertising, promoting, and marketing Disney Stitch Products. Disney Stitch Products have also been the

40. Certain Defendants'³ promotion, marketing, offering for sale, and sale of Unauthorized Products has created and is creating a likelihood of confusion, mistake, and deception among the general public as to the affiliation, connection, or association with DEI or the origin, sponsorship, or approval of Defendants' Unauthorized Products by DEI.

41. By using the Disney Trademarks in connection with the offering for sale and sale of Unauthorized Products, certain Defendants create a false designation of origin and a misleading representation of fact as to the origin and sponsorship of the Unauthorized Products.

42. Certain Defendants' false designation of origin and misrepresentation of fact as to the origin and/or sponsorship of the Unauthorized Products to the general public involves the use of counterfeit marks and is a willful violation of Section 43 of the Lanham Act, 15 U.S.C. § 1125.

43. DEI has no adequate remedy at law and will continue to suffer irreparable harm to its reputation and the associated goodwill of the Lilo & Stitch and DISNEY brands if certain Defendants' actions are not enjoined.

COUNT III
COPYRIGHT INFRINGEMENT OF UNITED STATES COPYRIGHT
REGISTRATIONS (17 U.S.C. §§ 106 and 501)

44. DEI hereby re-alleges and incorporates by reference the allegations set forth in the preceding paragraphs.

45. The Disney Stitch Copyrighted Works constitute original works and copyrightable subject matter pursuant to the Copyright Act, 17 U.S.C. § 101 *et seq.*

46. DEI owns the Disney Stitch Copyrighted Works. DEI has complied with the registration requirements of 17 U.S.C. § 411(a) for the Disney Stitch Copyrighted Works. The Disney Stitch Copyrighted Works are protected by a copyright registration number which was duly

³ Count II applies to all Defendants who infringed the Disney Trademarks, as outlined in Schedule A attached hereto.