

7. With a strong fan-base, Plaintiff and its licensees market and sell a variety of Led Zeppelin-branded products, including clothing, posters, pinball machines, towels, books, pins and other merchandise bearing Plaintiff's trademark (collectively, "Plaintiff's Products"). Plaintiff's Products have become enormously popular and even iconic, driven by Plaintiff's quality standards and innovative designs. Among the purchasing public, Plaintiff's Products are instantly recognizable as such. Plaintiff's Products are distributed and sold to consumers by Plaintiff and its licensees through authorized retailers throughout the United States and through Plaintiff's website,

8. Plaintiff has used the LED ZEPPELIN trademark for many years and has continuously sold products under its LED ZEPPELIN trademark ("Plaintiff's Trademark"). As a result of this long-standing use, strong common law trademark rights have amassed in Plaintiff's Trademark. Plaintiff's use of the mark has also built substantial goodwill in Plaintiff's Trademark. Plaintiff's Trademark is a famous mark and valuable asset of Plaintiff. Plaintiff's Products also typically include Plaintiff's Trademark.

9. Plaintiff's Trademark is registered with the United States Patent and Trademark Office and is included below.

Registration Number	Trademark	Registration Date	Goods and Services
4,340,692	LED ZEPPELIN	May 28, 2013	For: Sound recordings, namely, musical sound and/or video recordings; audio and visual recordings of music and entertainment; pre-recorded media containing musical and audio and visual recordings, namely, records and discs featuring music and entertainment; phonograph records; Downloadable MP3 files and MP3

			recordings featuring music and entertainment in class 009. For: Books in the field of music and entertainment; posters; printed matter, namely, books, instructional matter, and manuals in the field of music and entertainment in class 016. For: Articles of clothing, namely, shirts, jackets, pants, sweaters, shirts, shorts, footwear and headgear, namely, hats and caps in class 025.
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10. The U.S. registration for Plaintiff's Trademark is valid, subsisting, and in full force and effect. The registration for Plaintiff's Trademark constitutes *prima facie* evidence of its validity and of Plaintiff's exclusive right to use Plaintiff's Trademark pursuant to 15 U.S.C. § 1057(b). A true and correct copy of the United States Registration Certificate for Plaintiff's Trademark is attached hereto as **Exhibit 1**.

11. Plaintiff's Trademark is exclusive to Plaintiff and is displayed extensively on Plaintiff's Products and in marketing and promotional materials. Plaintiff's Trademark is also distinctive when applied to Plaintiff's Products, signifying to the purchaser that the products come from Plaintiff, or its licensees, and are manufactured to Plaintiff's quality standards. Whether Plaintiff manufactures the products itself or contracts with others to do so, Plaintiff has ensured that products bearing Plaintiff's Trademark are manufactured to the highest quality standards.

12. Plaintiff's Trademark is a famous mark, as that term is used in 15 U.S.C. § 1125(c)(1), and has been continuously used and never abandoned. The success of Led Zeppelin,