

1. This action has been filed by Plaintiffs to combat online infringers who trade upon Plaintiffs' reputation and goodwill by selling and/or offering for sale products in connection with Plaintiffs' registered V-COMB Trademark, which is covered by U.S. Trademark Registration No. 5,993,261 (the "V-COMB Trademark"). The registration is valid, subsisting, and in full force and effect. A true and correct copy of the federal trademark registration certificate for the V-COMB

Trademark is attached as **Exhibit 1**.

2. This is also an action for patent infringement to combat e-commerce store operators who trade upon Plaintiffs' reputation and goodwill by making, using, offering for sale, selling, and/or importing into the United States for subsequent sale or use, unauthorized and unlicensed products that infringe Plaintiffs' patent, U.S. Patent No. D858,877 S (the "V-COMB Patent"). The V-COMB Patent is valid, subsisting, and in full force and effect. Plaintiff Maor is an owner and the lawful assignee of all rights, title, and interest in and to the V-COMB Patent, which was duly and legally issued by the United States Patent and Trademark Office. A true and correct copy of the V-COMB Patent is attached as **Exhibit 2**.