

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Millimages S.A.,

Plaintiff,

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE A,

Defendants.

Case No. 26-cv-6263

COMPLAINT

Plaintiff, Millimages S.A. (“Plaintiff”), by and through its attorneys, Aronberg Goldgehn Davis & Garmisa, for its Complaint against The Partnerships and Unincorporated Associations Identified on Schedule A (collectively referred to as “Defendants”) states as follows:

ALLEGATIONS COMMON TO ALL COUNTS

Nature of the Case

1. Plaintiff uses and is the owner of the federally registered trademarks: U.S. Registration No. 5107091, and common law trademarks corresponding to the same. True and correct copies of the registration certificates for the above trademark is attached as **Exhibit A** (the “Molang Mark”).

2. Plaintiff uses and is the owner of the federally registered copyrights: U.S. Registration Nos. TX0008586339, TX0008613276, TX0008679413, TX0008540345, TX0008660600, and TX0008542698. True and correct copies of the registration certificates for the above copyrights are attached as **Exhibit B**. (the “Molang Copyrights”).

3. This action has been filed to combat the online trademark and copyright infringement and counterfeiting of Defendants, who trade upon Plaintiff’s valuable intellectual