

become one of the best-selling cookies worldwide, with numerous flavor variations, global popularity and around 40 billion global productions every year.

6. Among Plaintiff's most important assets is the intellectual property associated with its [REDACTED] brand. Specifically, Plaintiff is the assignee and owner of several U.S. trademark registrations (Reg. Nos. 93,009, 1,901,838, 3,955,767 and 4,773,083) used to identify the iconic cookies and related goods that it markets, sells, and licenses. Plaintiff distributes and retails these high-quality products within Indiana under the federally registered [REDACTED] Trademarks. Defendants' sales of the counterfeit items in violation of Plaintiff's trademark rights are irreparably damaging Plaintiff.

7. The registrations for the [REDACTED] Trademarks constitute prima facie evidence of their validity and of Plaintiff's exclusive right to use the [REDACTED] Trademarks pursuant to 15 U.S.C. § 1114. The [REDACTED] Trademarks have been continuously used and never abandoned since their first use.

8. Plaintiff's [REDACTED] Trademarks have been used in the United States in connection with the advertisement, design, distribution, and offer for sale of its [REDACTED] Products for over a century. The [REDACTED] Trademarks have become synonymous with the company's exacting quality standards. The unique designs of the [REDACTED] Products have achieved substantial popularity and recognition. Since its establishment, Plaintiff has introduced several variations of cookie flavors, shapes, and forms through its various e-commerce marketplaces and authorized retailers worldwide, including in the United States and Indiana. Plaintiff continues to heavily advertise its unique products on all its e-commerce marketplaces, social media, and advertisements under its federally registered trademarks. Its websites and social media feature original content, reviews, and testimonials for the [REDACTED] Products.

9. Plaintiff sells its genuine [REDACTED] Products only through the Company's website², and its licensed distributors, including online and brick and mortar distributors, which include all major marketplaces and grocery retail outlets.³ The [REDACTED] Products have become enormously popular and even iconic, driven by Plaintiff's exacting quality standards. Among the purchasing public, genuine [REDACTED] Products are instantly recognizable as such. In the United States and around the world, the [REDACTED] brand has come to symbolize high quality, and [REDACTED] Products are among the most recognizable in the United States.

10. The [REDACTED] Trademarks are exclusive to Plaintiff and are displayed extensively on [REDACTED] Products and in Plaintiff's marketing and promotional materials. The [REDACTED] Products have long been among the most popular products of their kind in the world and have been extensively promoted and advertised at great expense. In fact, Plaintiff has been advertising, promoting, and marketing featuring the [REDACTED] Trademarks.

11. Plaintiff has expended substantial time, money, and other resources in developing, advertising and otherwise promoting and protecting the [REDACTED] Trademarks. As a result, products bearing the [REDACTED] Trademarks are widely recognized and exclusively associated by consumers, the public, and the trade as being high-quality snacks from Plaintiff. The [REDACTED] Products have become among the most popular of their kind in the U.S. and the world. The widespread fame, outstanding reputation, and significant goodwill associated with the [REDACTED] brand have made the [REDACTED] Trademarks invaluable assets of Plaintiff.

Defendants

12. Defendants are unknown individuals and entities who conduct business targeting customers in the United States, including within the state of Indiana and in this Judicial District,

² [REDACTED]

³ [REDACTED]