

such fictitious names, and will seek leave to amend this Complaint to show their true names and capacities when same have been ascertained.

7. Plaintiff is informed and believes and thereon alleges that at all times relevant hereto each of the Defendants was the agent, affiliate, officer, director, manager, principal, alter-ego, and/or employee of the remaining Defendants and was at all times acting within the scope of such agency, affiliation, alter-ego relationship and/or employment; and actively participated in or subsequently ratified and adopted, or both, each and all of the acts or conduct alleged, with full knowledge of all the facts and circumstances, including, but not limited to, full knowledge of each and every violation of Plaintiff's rights and the damages to Plaintiff proximately caused thereby.

CLAIMS RELATED TO PLAINTIFF'S DESIGNS

8. Prior to the conduct complained of herein, Plaintiff composed a series of original rug designs including those allocated the following names: Agadir, Akal, Amapola, Amina, Aziza, Bacatta, Berberis, Chaabi, Dakhla, Darbu, Dassin, Ifassen, Inka, Iriqui, Myza, Sittima, Taghazout, Talassemtane, Tenda, Tisent, Tussock, Wadu, Yedder (collectively, the "Subject Designs"). The Subject Designs were original creations of Plaintiff and/or Plaintiff's design team, and is, and at all relevant times were, owned exclusively by Plaintiff. Copies of the Subject Designs are set forth in **Exhibit A**.

9. Plaintiff has registered the Subject Designs with the United States Copyright Office, including under Registration Nos.: VA0002406825 (Agadir), VA0002476014 (Akal), VA0002476336 (Amapola), VA0002476345 (Amina), VA0002406826 (Aziza), VA0002317159 (Bacatta), VA0002475999 (Berberis), VA0002317148 (Chaabi), VA0002476347 (Dakhla), VA0002406826 (Darbu), VA0002475997 (Dassin), VA0002477473 (Ifassen), VA0002476012 (Inka), VA0002476348 (Iriqui), VA0002475992 (Myza), VA0002476340 (Sittima),