

3. Plaintiff filed this action to combat online infringers and counterfeiters who trade upon Plaintiff's reputation and goodwill by selling and/or offering for sale unauthorized and unlicensed counterfeit and infringing products using counterfeit versions of Plaintiff's federally registered trademarks SKINNIES (Reg. No. 5,868,214), INSTANT LIFTS (Reg. No. 4,267,225), and INSTANT THIGH LIFT (Reg. No. 3,629,493) (collectively the "INSTANT LIFTS Trademarks"). See **Exhibit 1**. The Defendants created internet stores (the "Defendant Internet Stores" or the "Stores") by the dozens and designed them to appear to be selling genuine copies of Plaintiff's products, when in fact, the Stores are selling counterfeit versions to unknowing customers.