

COMPLAINT

Plaintiff, Shenzhen Daisili Commercial Co., Ltd., (“Plaintiff”), hereby files this Complaint for damages and injunction relief for copyright infringement against the Individuals, Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations identified on Schedule “A” hereto (collectively, the “Defendants”) and in support of its claims states as follows:

NATURE OF THE ACTION

1. Plaintiff is the owner of all rights, title, and interest in and to United States Copyright Registrations for specific photographic art. Plaintiff owns the federal copyright registration numbers for its original photographs: VA0002422341, VA0002422339, VA0002407257, and VA0002407256 (“Copyrighted Photos”). See Copyright Registration and Copyrighted Photos at issue attached as **Exhibit 1**.

2. Plaintiff is an individual that licenses its photographic works to clothing companies for commercial use in advertising and marketing.