

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ARNIE FISK,

Plaintiff,

v.

SCHEDULE A DEFENDANTS,

Defendants.

Case No. 26-cv-151

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

Plaintiff hereby sues Defendants, the Individuals, Partnerships, and Unincorporated Associations identified in the Caption, which are set forth in **Schedule “A”** hereto (collectively “Defendants”). All Defendants are knowingly and intentionally promoting, advertising, distributing, offering for sale, and selling infringing versions of Plaintiff’s copyrighted works (the “Infringing Products”) on the Amazon.com, Walmart.com, and Temu.com online marketplaces, operating under the seller identities and/or the online marketplace accounts as set forth on **Schedule “A”** hereto (the “Seller IDs” and collectively, the “Defendant Merchant Storefronts”). In support of its claims, Plaintiff alleges as follows:

NATURE OF ACTION

1. Plaintiff is the owner of a United States Registered Copyrights which are infringed by Defendants. Each Defendant has infringed at least one of Plaintiff’s Registered Copyrights. Below is a side-by-side comparison of Plaintiff’s copyrighted works and an example of Defendants’ products that embody Plaintiff’s copyrighted works:

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-442-813	Aviary Library		 Def #1-23, 46-75, 80-81
VA 2-441-692	Tiffany Bee		 Def #24-34, 76-79, 82-117
VA 2-441-683	Aviary home		 Def #35-36, 118-160
VA 2-442-254	St. Tropez Botanical		 Def #37-43
VA 2-441-693	Cote d'Azur Botanical		 Def #44-45, 161