

30. Plaintiff hereby re-alleges and incorporates by reference the allegations set forth in the preceding paragraphs.

31. Plaintiff is the owner of valid and enforceable Hexin Works, which contain original works and certain copyrightable subject matter under 17 U.S.C. §§ 101, et seq.

32. Plaintiff has complied with the registration requirements of 17 U.S.C. § 411(a). Hexin Works are protected by Copyright Registration Nos. VA 2-425-485, VA 2-432-905, VA 2-403-287, VA 2-412-761, and VA 2-378-997, which have been duly issued to Plaintiff by the United States