

have reproduced and displayed Plaintiff's copyrighted photographs without authorization. Defendants trade upon Plaintiff's reputation, goodwill, and valuable copyrights by selling and/or offering for sale products using Plaintiff's photographs in their online listings.

5. Plaintiff is the owner of United States Copyright Registration Nos. VA 2-430-938; VA 2-430-843; VA 2-430-812; VA 2-430-813; VA 2-430-846; VA 2-430-936; VA 2-430-810; VA 2-430-817; VA 2-430-847; VA 2-432-758; VA 2-432-747; VA 2-431-910; VA 2-430-932; VA 2-430-927; VA 2-430-937; VA 2-430-814; VA 2-430-790; VA 2-431-912; VA 2-430-929; VA 2-430-842; and VA 2-431-911 (the "MindTraveler Barcelona Works") and the registrations are attached hereto as Exhibit 1. Upon information and belief, the copyrights have effective dates that predate the Defendants' acts of copyright infringement.