

Plaintiff, Triumph Designs, Ltd. (“Plaintiff”), by and through its attorneys, Aronberg Goldgehn Davis & Garmisa, for its Complaint against The Partnerships and Unincorporated Associations Identified on Schedule A (collectively referred to as “Defendants”) states as follows:

ALLEGATIONS COMMON TO ALL COUNTS

Nature of the Case

1. Plaintiff uses and is the owner of several federal registered trademarks used in connection with various products, including U.S. Registration Nos. 552,794; 1,939,115; 2,059,661; 2,091,751; 2,115,041; 2,359,174; 2,351,657; 2,571,967; 2,978,998; 4,626,629; 5,061,608; 6,488,464; 5,483,141; 5,362,191; 5,436,713; 5,435,714; 5,521,754; 5,521,755; 5,483,267; 5,516,233; 5,505,573; 5,483,284; 5,992,943; 5,864,899; 6,241,969; 7,215,532; 7,390,054; 6,866,489; 5,029,574; 6,481,285; 5,309,264; and 6,014,143 (“Triumph Marks”). A true and correct copy of the registration certificates for Plaintiff’s Trademarks are attached as **Exhibit**