

III. THE PARTIES

Plaintiff

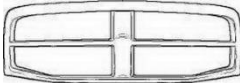
4. In January of 2021, Peugeot S.A. merged with and into Fiat Chrysler Automobiles N.V., with Fiat Chrysler Automobiles N.V., as the surviving company in the merger. The combined company was renamed Stellantis N.V. (“Stellantis”). FCA US LLC is a wholly owned indirect subsidiary of Stellantis. FCA US LLC is referred to herein as “FCA.”

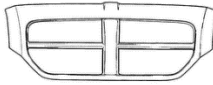
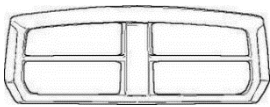
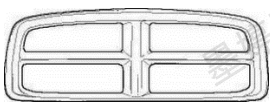
5. FCA is one of the nation’s leading automotive manufacturing corporations, with millions of vehicles sold in the United States and globally, including FCA’s famous Chrysler®, Dodge®, JEEP®, and Ram® brand cars and trucks.

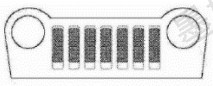
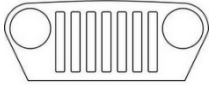
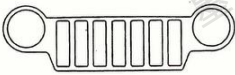
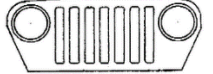
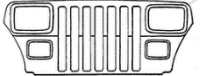
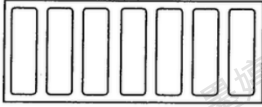
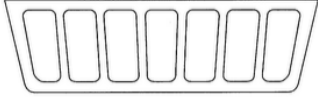
6. FCA is associated with some of the most famous brands in the automotive industry, including, but not limited to, Chrysler, Dodge, Jeep, Ram, Mopar, Alfa Romeo, FIAT, and Maserati.

7. Propelled by its reputation and recognizable trademarks, which are carefully curated and monitored, consumers recognize Plaintiff and the FCA brands as a source of reliable and quality vehicles, vehicle parts, and accessories (collectively, the “FCA Products”). FCA has registered many of its trademarks with the United States Patent and Trademark Office. FCA Products typically include at least one of FCA’s registered trademarks. FCA uses its trademarks in connection with the marketing of its FCA Products, including the following marks which are collectively referred to as the “FCA Trademarks.”

Registration Number	Trademark
570186	CHRYSLER
1193586	PLYMOUTH
2861480	300C
3941344	

801717	
1189233	DODGE
3538635	CHALLENGER
2985653	CHARGER
1800654	VIPER
4325240	DART
5839879	SCAT PACK
3264572	SUPER BEE
3098722	SRT
3209150	R/T
2999082	
5382204	
4831385	
4696903	
3264573	
2760226	
2994818	

3053379	
1741153 3018766	HEMI
2994481 2983053	MOPAR
383304	MoPAR
2919922	
3806969	RAM
3071692	BIG HORN
1973148	LARAMIE
4946811	REBEL
6289815	TRX
3160030	
2970629	
2593670	
0526175 1130015 1134153 1236540 2512866 2849309 4091155	JEEP
1557843	WRANGLER
4518178	CHEROKEE
1415771	RENEGADE
2666854	RUBICON
6992182	J^{🐾🐾}p

4272873	
2975740	
1170088	
3199299	
4043984	
2924936	
2794553	
1433760 2732021	
2823099	
2764249	

8. The above U.S. registrations for the FCA Trademarks are valid, subsisting, in full force and effect, and many are incontestable pursuant to 15 U.S.C. § 1065. The registrations for the FCA Trademarks constitute *prima facie* evidence of their validity and of FCA's exclusive right to use the FCA Trademarks pursuant to 15 U.S.C. § 1057(b). True and correct copies of the United