

renamed “Barbie Boulevard”, has been depicted in a painting by the artist Andy Warhol, has landed the cover of *Time Magazine* and in 2023 became the first and only fictional character to be named as one of *Forbes’* most powerful women in the world, and is part of the Smithsonian Institution’s collection in the National Museum of American History. In 2023, Director Greta Gerwig’s film *Barbie* was released as the first live action adaptation of the Barbie brand. The *Barbie* film was the highest grossing film worldwide for that year and has been nominated for more than 450 awards.

14. The Barbie brand has been a global success that resonates with children and adults worldwide, making Barbie one of the most recognizable brands around the world. Among the purchasing public, genuine Barbie Products are instantly recognizable as such.

15. The BARBIE trademark was first used in 1959, and products have continuously been sold under the BARBIE trademark and other trademarks (collectively, the “BARBIE Trademarks”). As a result of this long-standing use by Mattel, strong common law trademark rights and goodwill have amassed in the BARBIE Trademarks. The BARBIE Trademarks are registered with the United States Patent and Trademark Office, a non-exclusive list of which is included below.

Registration No.	Trademark
0689055; 0741208; 0768331; 0768397; 0772298; 0810106; 0813733; 0814091; 0814995; 0816601; 0817200; 1000125; 1041587; 1300766; 1693139; 1746477; 1754535; 1769285; 1773571; 1775637; 1795564; 1795876; 1946918; 2040801; 2151953; 2410087; 2469935; 2495195; 2678386; 3287023; 6267201; 6267202; 6302628; 6324165; 6325496; 7157088	BARBIE
4720463	BARBIE AND THE NUTCRACKER

6719769	BARBIE BIG CITY, BIG DREAMS
3083593	BARBIE COLLECTOR
5602185; 5602186	BARBIE DREAMHOUSE ADVENTURES
5233292	BARBIE DREAMTOPIA
5441651	BARBIE LIVE! IN THE DREAMHOUSE
5371526	BARBIE SIGNATURE
726935; 780598; 3317103; 6595905	KEN
3210590	BABY DOCTOR
5449612	BABYSITTERS INC.
4412006	BALLET WISHES
4227182	BEACH CRUISER
3319393	BFMC
3494631	BLACK LABEL
6038017	BMR1959
4071738	CAREER OF THE YEAR
2931614	CHELSEA
6686535	CHELSEA CAN BE...
6629906	CHRISTIE
5370938	CLUB CHELSEA
6097805	COLOR REVEAL
1461136	COURTNEY
5782681	DOGGY DAYCARE
6267675	DREAM CLOSET
1671877	DREAM HOUSE

5546538	DREAMCAMPER
6382383	FASHION FUN FOR EVERYONE
3702525	FASHIONISTAS
6647901	FAST CAST CLINIC
6267600	FLIGHT OF FASHION
6207164	FRESH 'N' FUN
4891547	GLAM GETAWAY
3024502	GOLD LABEL
1046919	HAPPY BIRTHDAY
6085856	HOLIDAY BARBIE
5613219	INSPIRING WOMEN
2261294	NIKKI
6383700	PINK COLLECTION
3189837	PINK LABEL
3093909	PLATINUM LABEL
6284544	PRANCE & SHIMMER
6207163	PRINCESS ADVENTURE
6442742	RAINBOW MAGIC
2968401	RAQUELLE
3060989	SILKSTONE
774892	SKIPPER
877712	STACEY
1567336	STACIE
1476090	STEVEN

3084790	TAFFY
1477905	TERESA
6229735	TINY WISHES
5689325	TOTALLY HAIR
6755261	TRIBUTE COLLECTION
4281537	ULTIMATE CLOSET
5836167	ULTIMATE CURLS
5214711	YOU CAN BE ANYTHING
3236501	ZOO DOCTOR
7408956	
2087842	
2150392	
2639971	
6290394	

3493061; 3684469	
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16. The above U.S. registrations for the BARBIE Trademarks are valid, subsisting, in full force and effect, and many are incontestable pursuant to 15 U.S.C. § 1065. The registrations for the BARBIE Trademarks constitute *prima facie* evidence of their validity and of Mattel's exclusive right to use the BARBIE Trademarks pursuant to 15 U.S.C. § 1057(b). Incontestable status under 15 U.S.C. § 1065 provides that the registrations for the BARBIE Trademarks are conclusive evidence of the validity of Mattel's BARBIE Trademarks and of the registrations of the BARBIE Trademarks, of Mattel's ownership of the BARBIE Trademarks, and of Mattel's exclusive right to use the BARBIE Trademarks in commerce. 15 U.S.C. §§ 1115(b), 1065. True and correct copies of the United States Registration Certificates for the above-listed BARBIE Trademarks are attached hereto as **Exhibit 1**.

17. The BARBIE Trademarks are distinctive when applied to Barbie Products, signifying to the purchaser that the products come from Mattel and are manufactured to Mattel's quality standards. Mattel ensures that products bearing the BARBIE Trademarks are manufactured to the highest quality standards.

18. The BARBIE Trademarks are famous marks as that term is used in 15 U.S.C. § 1125(c)(1). The innovative marketing and product designs of the Barbie Products have enabled the Barbie brand to achieve widespread recognition and fame. The widespread fame, outstanding reputation, and significant goodwill associated with the Barbie brand have made the BARBIE Trademarks valuable assets of Mattel.

19. Mattel is among a limited number of companies that not only develop and produce global entertainment properties, characters, and content, but also monetize that content through the creation, sale, and licensing of products. Mattel has expended substantial time, money, and other resources in advertising and promoting the BARBIE Trademarks. In fact, Mattel has expended millions of dollars in advertising, promoting, and marketing featuring the BARBIE Trademarks. Barbie Products have also been the subject of extensive unsolicited publicity resulting from their high-quality, innovative designs. As a result, products bearing the BARBIE Trademarks are widely recognized and exclusively associated by consumers, the public, and the trade as being high-quality products sourced from Mattel. Barbie Products have become among the most popular of their kind in the U.S. and the world. The BARBIE Trademarks have achieved tremendous fame and recognition which has only added to the distinctiveness of the marks. As such, the goodwill associated with the BARBIE Trademarks is of incalculable and inestimable value to Mattel.

20. Barbie Products are distributed and sold to consumers through authorized retail channels throughout the United States, including through authorized retailers in Illinois.

21. Mattel has also registered the Barbie silhouette design (the “Barbie Copyrighted Work”) with the United States Copyright Office under the title “Barbie Silhouette Head” (U.S. Copyright Registration No. VA 1-884-053), issued by the Register of Copyrights on December 12, 2013. A true and correct copy of the U.S. federal copyright registration certificate for the above-referenced Barbie Copyrighted Work is attached hereto as **Exhibit 2**.

22. Among the exclusive rights granted to Mattel under the U.S. Copyright Act are the exclusive rights to reproduce, prepare derivative works of, distribute copies of, and display the Barbie Copyrighted Work to the public.