

8. For more than twenty (20) years, Deckers has sold and marketed the UGG®

Tasman®, which features the design elements protected under the Tasman® Trade Dress.

Tasman® is a registered trademark in the United States owned by Deckers (Reg. No. 7,544,904).

Defendants

9. Defendants are individuals or business entities of unknown makeup who own

and/or operate the e-commerce stores under at least the Seller Aliases and/or other seller aliases

not yet known to Deckers. On information and belief, Defendants reside and/or operate in the

People's Republic of China or other foreign jurisdictions with lax intellectual property

enforcement systems, or redistribute products from the same or similar sources in those locations.

10. Defendants have the capacity to be sued pursuant to Federal Rule of Civil Procedure

17(b). If Defendants provide additional credible information regarding their identities, Deckers