

1. This action has been filed by Plaintiff to combat e-commerce store operators who trade upon Plaintiff's reputation and goodwill by selling and/or offering for sale products in connection with Plaintiff's AUQ trademark, U.S. Trademark Registration No. 6,278,128. The AUQ trademark registration is valid, subsisting, and in full force and effect. A true and correct copy of the federal trademark registration certificate for the AUQ mark is attached hereto as **Exhibit 1**.

2. Defendants create numerous e-commerce stores that are advertising, offering for