

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 GJX trademark, U.S. Trademark Registration No. 6,812,546. The GJX trademark registration is valid, subsisting, and in full force and effect. A true and correct copy of the federal trademark registration certificate for the GJX mark is attached hereto as **Exhibit 1**.

2. Defendants create numerous e-commerce stores that are advertising, offering for sale, and selling infringing and counterfeit GJX products to unknowing consumers. Defendants