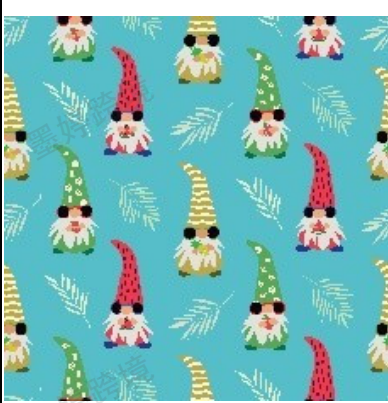
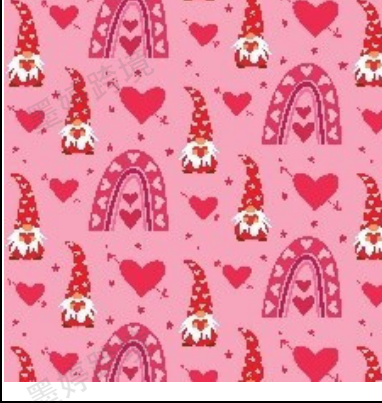
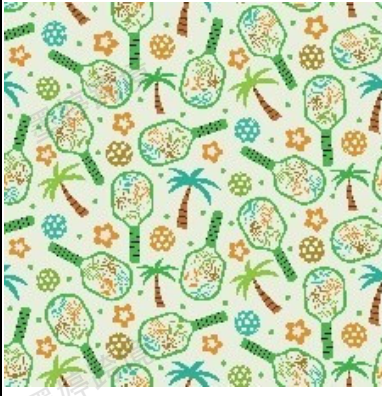
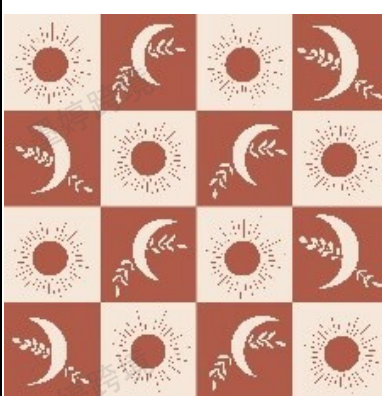
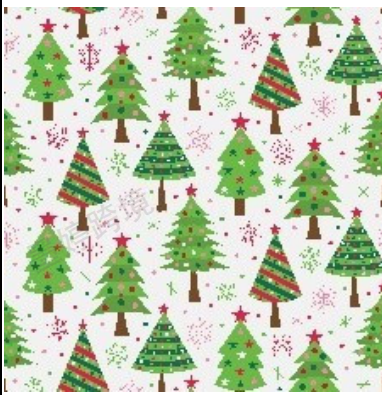


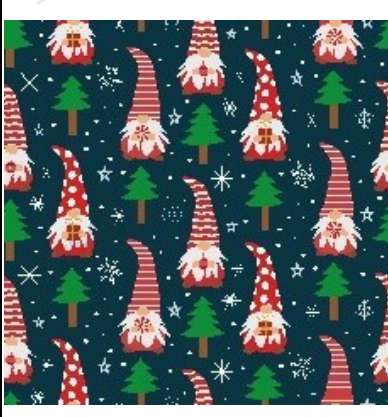
Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-450-920	Mid Century Modern Boomerang seamless pattern with atomic retro stars in orange, teal, green, pink and yellow		 Def # 1-29, 201-204, 222-230
VA 2-450-916	Mid Century Modern Boomerang seamless pattern with atomic retro starbursts in orange, red, pink and yellow on white background		 Def # 30-39, 205-206, 231-251
VA 2-450-828	Cute Summer gnomes with sunglasses holding fruits and palm tropical leaves seamless pattern		 Def # 40-65, 207-212

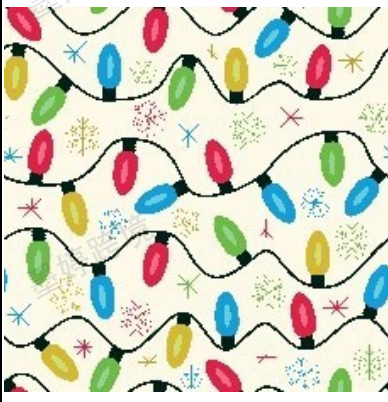
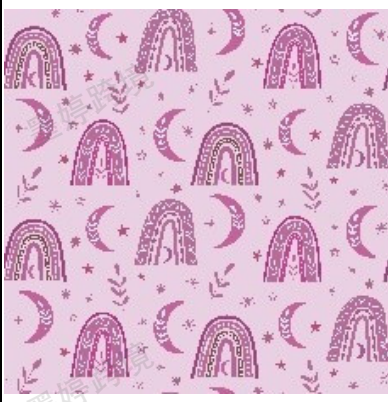
VA 2-450-865	Groovy cowgirl boots , hats ,cactus and horseshoe seamless pattern in peach fuzz, orange and pink with retro flowers and stars		Def # 66-77, 213-218
VA 2-450-847	Cute valentines day seamless pattern with red boho rainbows , gnomes and hearts with arrows on plush pink background		Def # 78-87
VA 2-450-855	Cute valentines day seamless pattern with red boho rainbows , gnomes and hearts with arrows on plush pink background.		Def # 88

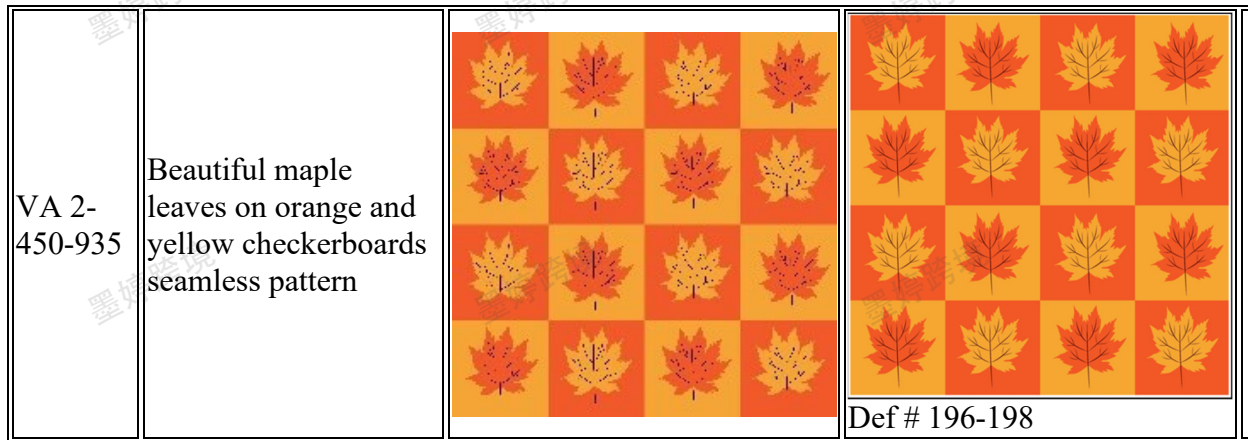
VA 2-450-844	Cute valentines day seamless pattern with pink boho rainbows , gnomes and hearts with arrows on plush pink background		 Def # 89
VA 2-450-929	Pickleball paddles seamless pattern with tropical leaves, palm trees and balls		 Def # 90-100
VA 2-450-856	Fun gingerbread man seamless pattern in different expressions with snow on red background		 Def # 101-111

VA 2-450-817	Christmas disco balls seamless pattern with Santa hats, snowflakes and starbursts in red and pink		Def # 112-121
VA 2-450-815	Checkered terracotta sun and boho moon seamless pattern		Def # 122-129
VA 2-450-861	Geometric minimal Scandinavian Christmas trees seamless pattern with snowflakes and stars in green, red and pink on white background		Def # 130-137

VA 2-450-932	Retro cowgirl hats on groovy pink disco balls seamless pattern with stars.		 Def # 138-145
VA 2-450-914	Mid century colorful starbursts on ogee shapes seamless pattern.		 Def # 146-151
VA 2-450-910	Halloween scary ghosts seamless pattern on warped checkerboards in pink, orange and purple		 Def # 152-158
VA 2-450-934	Simple pickle ball paddle seamless pattern with little hearts		 Def # 159-165

VA 2-450-923	Mid century modern optical half circles seamless pattern in brunt orange, teal , red, black and white		Def # 166-171, 219-221
VA 2-450-827	Cute Mushrooms on white and red checkered squares seamless pattern		Def # 172-177
VA 2-450-825	Cute Christmas gnomes holding presents, candy and ornaments with Christmas trees and snowflakes over dark blue background		Def # 178-182

VA 2-450-824	Colorful Christmas Lights with strings and snowflakes seamless pattern in red, green, blue and yellow		Def # 183-187
VA 2-450-931	Pink boho rainbow seamless pattern with boho moon, leaves and stars in fuchsia on plush pink background.		Def # 188-191
VA 2-450-841	Cute Thanksgiving gnomes seamless pattern holding pumpkins with autumn leaves on light brown background		Def # 192-195



JURISDICTION AND VENUE

2. This Court has original subject matter jurisdiction over the claims in this action pursuant to the provisions of the Federal Copyright Act, 17 U.S.C. § 101, et seq., 28 U.S.C. § 1338(a)–(b), and 28 U.S.C. § 1331.

3. Personal jurisdiction over each Defendant satisfies constitutional due process because each Defendant has purposefully directed and expressly aimed its tortious activities at the Commonwealth of Pennsylvania and established sufficient minimum contacts with Pennsylvania by, among other things, be willing to accept an order for a product bearing Plaintiff's copyrighted designs from a representative of Plaintiff with a Pennsylvania address, be willing to ship the product to that representative in Pennsylvania, and be willing to collecting Pennsylvania sales tax. In addition, upon information and belief, each Defendant has sold additional products bearing Plaintiff's copyrighted designs to consumers within Pennsylvania not affiliated in any way with Plaintiff through the regular course of business, with the knowledge that Plaintiff is harmed in Pennsylvania as a result of its sales of infringing products to Pennsylvania residents. Plaintiff's claims arise out of and relate to Defendants' sales of infringing products bearing Plaintiff's copyrighted designs to Pennsylvania residents through the regular course of business.