

Procedure 4(k)(2) confers personal jurisdiction over Defendants because the claims asserted herein arise under federal copyright law, Defendants would not be subject to jurisdiction in any state's courts of general jurisdiction, and exercising jurisdiction is consistent with the United States Constitution and laws. *NBA Props., Inc. v. HANWJH*, 46 F.4th 614, 622-23 (7th Cir. 2022).

3. All Defendant products using the Copyrighted Photographs were purchased between June 2024 to October 2024 and have since shipped to the State of Illinois and the City of Chicago and have been delivered between June 2024 and November 2024. See **Exhibit 4**.

II. INTRODUCTION

4. Plaintiff is the owner of the federal copyright registrations; VA0002384829, VA0002384843, VA0002379897, VA0002413190, VA0002381109, VA0002381157, VA0002381125, VA0002381188, VA0002381202, VA0002381209, VA0002381141, and VA0002379907 (the "Copyright Registrations") which protects the creative content of Plaintiff's group of published photographs ("Copyright Protected Photographs"). Plaintiff is a Hong Kong based women's fashion brand who operates under the brand name, Rotita. The Rotita brand is globally recognized for its clothing items. Plaintiff uses the Copyright Protected Photographs to advertise, market, and otherwise promote Plaintiff's products. Plaintiff's Copyright Protected Photographs are carefully composed to attract, invite, display, and show consumers the clothing, dresses, tops, swimsuits, and other clothing items Plaintiff has to offer. The Copyright Protected Photographs are one of Plaintiff's most effective means of connecting with consumers and are essential to the commercial success of the Rotita brand.

5. This action has been filed by Plaintiff to combat the online copyright infringers who have reproduced and displayed Plaintiff's Copyright Protected Photographs without authorization.