

VA 2-459-773; VA 2-453-273; VA 2-453-485; VA 2-453-279; VA 2-453-267; VA 2-453-483; VA 2-453-490; VA 2-459-329; VA 2-453-489; VA 2-459-286; VA 2-453-346; VA 2-453-251; VA 2-453-262; VA 2-459-281; and VA 2-453-357 (the “Lily & Val Works”) and the registrations are attached hereto as Exhibit 1. Upon information and belief, the copyrights have effective dates that predate the Defendants’ acts of copyright infringement.

6. In an effort to illegally profit from the creative content of the Lily & Val Works, Defendants have created numerous Defendant Internet Stores and designed them to appear to be selling authorized Lily & Val Products.

7. The Defendant Internet Stores share unique identifiers, such as design elements and similarities of the unauthorized products offered for sale, establishing a logical relationship between them and suggesting that Defendants’ illegal operations arise out of the same transaction, occurrence, or series of transactions or occurrences. Defendants’ activities, occurring at the same time and in the same retail space and manner as one another, blend together to create a single negative impression on consumers such that they constitute the same occurrence or series of occurrences. Defendants attempt to avoid liability by going to great lengths to conceal both their identities and the full scope and interworking of their illegal operation. Plaintiff is forced to file this action to combat Defendants’ piracy of the Lily & Val Works. Plaintiff has been and continues to be irreparably damaged through loss of control over the creative content of the valuable copyrights, reputation, goodwill, the quality and ability to license as a result of Defendants’ actions and seeks injunctive and monetary relief.

THE PLAINTIFF

8. Plaintiff, Lily & Val, LLC, is the owner of the Copyright Registrations that protect the creative content of the Lily & Val Works. For over ten years, Lily & Val has blended nostalgia