

is forced to file this action to combat Defendants' infringement of its copyrighted works and trademark rights, as well as to protect consumers from purchasing Unauthorized Products over the internet. Plaintiff has been, and continues to be, irreparably damaged through loss of market share (including the inability to generate and expand market share) and erosion of Plaintiff's copyright and trademark rights because of Defendants' actions and therefore seeks injunctive and monetary relief.

THE PARTIES

5. Plaintiff, Bullseyebore, Inc., is a Wyoming corporation with its principal place of business at 1613 Evans Avenue #490, Cheyenne, WY 82001-4616.

6. Plaintiff additionally owns the copyright in the original marketing photographs used to promote its laser-alignment tool product, registered with the U.S. Copyright Office under Registration No. VA 2-378-708, effective January 14, 2024, covering a group of 16 published photographs titled "Bullseye Bore Photographs for website October 2023" (the "Registered Work"). A true and correct copy of the copyright registration certificate is attached hereto as **Exhibit 1**.

7. Plaintiff additionally owns U.S. Trademark Registration No. 7585987 (the "Registered Mark"), covering the distinctive BULLSEYEBORE mark as applied to its laser-alignment drill guide products. The Registered Mark is affixed directly to Plaintiff's product and its packaging, serving as a source identifier for consumers. A true and correct copy of the trademark registration certificate is attached hereto as **Exhibit 2**.

8. Plaintiff has invested substantial resources developing its unique laser-based alignment tool, which has achieved significant commercial success and viral popularity. Plaintiff's product, a precision alignment tool for rotary boring applications, is marketed under the