

II. INTRODUCTION

3. Plaintiff is the owner of the federal copyright registrations VA0002459687, VA0002417353, VA0002459690, VA0002459691, VA0002436262, VA0002435965, VA0002381117, VA0002417360, VA0002379895, VA0002379894, VA0002384843, VA0002379888, VA0002379930, VA0002381115, and VA0002384828 (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.