

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO.: 25-CV-23135

SEGA CORPORATION,

Plaintiff,
v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A,”

Defendants.

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COMPLAINT

Plaintiff Sega Corporation (“Sega” or “Plaintiff”) hereby brings the present action against the Partnerships and Unincorporated Associations Identified on Schedule A attached hereto (collectively, “Defendants”) and alleges as follows:

I. JURISDICTION AND VENUE

1. This is an action seeking damages and injunctive relief for trademark counterfeiting and infringement and false designation of origin under the Lanham Act pursuant to 15 U.S.C. §§ 1114, 1116, 1121, 1125(a), and 1125(d); The All Writs Act, 28 U.S.C. § 1651(a); and 15 U.S.C. § 1051, *et seq.*

2. This Court has original subject matter jurisdiction over Sega’s claims pursuant to the provisions of the Lanham Act, 15 U.S.C. § 1051, *et seq.*, 28 U.S.C. § 1338(a)-(b), and 28 U.S.C. § 1331.

3. Venue is proper in this Court pursuant to 28 U.S.C. § 1391, and this Court may

exercise personal jurisdiction over Defendants because Defendants structure their business activities to directly target consumers in the United States, including Florida, through at least the fully interactive e-commerce stores operating under the aliases identified on “Schedule A” attached hereto (the “Seller Aliases”). Specifically, Defendants have targeted sales to Florida residents by setting up and operating e-commerce stores that target United States consumers; offer shipping to the United States, including Florida; accept payment in U.S. dollars; and, on information and belief, have sold products using infringing and counterfeit versions of Sega’s federally registered trademarks (collectively, the “Unauthorized Products”) to residents of the United States and Florida. Each of the Defendants is committing tortious acts in the United States and Florida, is engaging in interstate commerce, and has wrongfully caused Sega substantial injury in the United States, including in Florida.

II. INTRODUCTION

4. Sega filed this case to prevent e-commerce store operators who trade upon Sega’s reputation and goodwill from further selling and/or offering for sale Unauthorized Products. Defendants create e-commerce stores under one or more Seller Aliases and then advertise, offer for sale, and/or sell Unauthorized Products to unknowing consumers. E-commerce stores operating under the Seller Aliases share unique identifiers, such as design elements and similarities of the Unauthorized Products offered for sale, establishing that a logical relationship exists between them, and that Defendants’ infringing and counterfeiting operation arises out of the same transaction, occurrence, or series of transactions or occurrences. Defendants take advantage of a set of circumstances, including the anonymity and mass reach afforded by the Internet and the cover afforded by international borders, to violate Sega’s intellectual property rights with impunity. Defendants attempt to avoid liability by operating under one or more Seller Aliases to

conceal their identities, locations, and the full scope and interworking of their operation. Sega is forced to file this action to combat Defendants' counterfeiting of its registered trademarks, as well as to protect consumers from purchasing Unauthorized Products over the Internet. Sega has been, and continues to be, irreparably damaged through consumer confusion, dilution, and tarnishment of its valuable trademarks because of Defendants' actions and therefore seeks injunctive and monetary relief.

III. THE PARTIES

5. Plaintiff Sega Corporation is a Japanese corporation having its principal place of business at Sumitomo Fudosan Osaki Garden Tower, 1-1-1 Nishi-Shinagawa-ku, Tokyo 141-0033, Japan. Plaintiff is a wholly owned subsidiary of Sega Sammy Holdings, Inc., a publicly traded company on the Tokyo Stock Exchange. Sega Corporation owns the trademarks asserted in this action. Plaintiff Sega Corporation and Sega Sammy Holdings, Inc. are referred to herein together or individually as "Sega."

6. Sega is a multinational video game, entertainment, and animation company, as well as a former manufacturer of home computers and video game consoles. Sega has developed and manufactured numerous video game consoles, including the famous video game consoles Sega Genesis and Sega Dreamcast, and also provides software as a third-party developer. Known as one of the most iconic developers in the video game industry, Sega has successfully developed and launched multiple video game franchises including Sonic the Hedgehog, Hatsune Miku: Colorful Stage!, and Yakuza / Like a Dragon.

7. Sega's COLORFUL STAGE! video game franchise launched in 2021 and includes the top-performing mobile-rhythm narrative rhythm game *Hatsune Miku: Colorful Stage!*, which is the U.S. localization title of the game that originally released in Japan as *Project Sekai: Colorful*

Stage! featuring Hatsune Miku. The Colorful Stage! franchise also includes a movie based on Sega’s popular game—*Colorful Stage! The Movie: A Miku Who Can’t Sing*—a 2025 animated musical drama directed by Hiroyuki Hata and produced by P.A. Works. The film premiered in Japan on January 17, 2025, and has since been released in the United States—available to stream on Netflix and Amazon Prime Video.

8. The Yakuza / Like a Dragon franchise (“Like a Dragon franchise”), which includes video games like *Yakuza*, *Yakuza 2*, *Yakuza: Like a Dragon*, and more that have consistently released on gaming platforms since 2005, began in Japan as RYŪ GA GOTOKU (which translates to “Like a Dragon”). Sega has extended the Like a Dragon brand in certain markets, including the United States, under the mark LIKE A DRAGON to align with the franchise’s original Japanese identity. The franchise consists primarily of action-adventure and role-playing video games that feature crime drama storylines.

9. Sega’s Colorful Stage! and Yakuza / Like a Dragon franchises are two of its most popular video game franchises and have gained worldwide popularity. As an example, *Hatsune Miku: Colorful Stage!* is ranked #12 in music games on the Apple Store and has over 180,000 customer ratings amounting to a 4.8/5 star rating. Similarly, the game has over 10 million downloads on the Google Play store and has over 130,000 customer reviews. Additionally, Sega’s *Yakuza: Like a Dragon* game was nominated for a slew of awards from both the Game Awards and NAVGTR (National Academy of Video Game Trade Reviewers), and ultimately won the NAVGTR award for Outstanding Game, Original Role Playing in 2021.

10. Sega markets and sells a variety of products emanating from its Sega, Colorful Stage!, and/or Like a Dragon brands, including video games and video game consoles; accessories like key chains; backpacks; face masks; cell phone covers; apparel including t-shirts and

sweatshirts; household items such as water bottles, mugs, blankets, and pillows; and other collectibles such as plush toys, comics, and toys (collectively, “Sega Products”).

11. Sega Products have become enormously popular and even iconic, driven by Sega’s quality standards and innovative designs. Among the purchasing public, Sega Products are instantly recognizable as such. The Sega, Colorful Stage!, and Like a Dragon brands have become global successes, and Sega Products are among the most recognizable in the world. Sega Products are distributed and sold to consumers through retailers throughout the United States, including through authorized retailers in Florida such as Amazon, Old Navy, Target, Walmart, Best Buy, GameStop, and Kohls, and through the www.likeadragon.sega.com and www.colorfulstage-store.sega.com websites.

12. Sega has used the SEGA, COLORFUL STAGE!, and LIKE A DRAGON trademarks, and other trademarks, for many years and has continuously sold products under its trademarks (collectively, the “Sega Trademarks”). As a result of this long-standing use, strong common law trademark rights have amassed in the Sega Trademarks. Sega’s use of the marks has also built substantial goodwill in the Sega Trademarks. The Sega Trademarks are famous marks and valuable assets of Sega. Sega Products typically include at least one of the Sega Trademarks.

13. The Sega Trademarks are registered with the United States Patent and Trademark Office, a non-exclusive list of which is included below.

Registration Number	Trademark	Registration Date	Goods and Services
6,959,589	COLORFUL STAGE!	Jan. 24, 2023	For: Downloadable computer game programs; recorded computer game programs; downloadable computer game software; recorded computer game software; downloadable video game software; recorded video game software; downloadable video game programs;

		<p>recorded video game programs; video game discs and cartridges; downloadable computer game software for use on mobile and cellular phones; mobile phone straps; protective cases for cell phones; downloadable graphics, images, and video recordings for computers, video game machines and mobile phones featuring scenes and characters based on computer and video games; downloadable computer game and video game software; downloadable music files via a global computer network and wireless devices; sound recordings recorded on compact discs featuring music, video game sounds and dialogues; prerecorded compact discs, magnetic audio tapes, and downloadable files featuring music; prerecorded video discs and magnetic audio tapes featuring music, comedy, drama, action, adventure and animation; electronic publications, namely, downloadable books and magazines in the field of computer games, video games, cartoons and music; phonograph records featuring music; recorded compact discs featuring animated cartoons; videotapes and videodiscs recorded with animation; downloadable electronic publications in the nature of books, manuals, catalogs, pamphlets, and magazines in the field of computer games, video games, cartoons and music; pedometers; scales; bathroom scales in Class 009.</p> <p>For: Pastes and other adhesives for stationery or household purposes; hygienic hand towels of paper; towels of paper; table napkins of paper; hand</p>
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		<p>towels of paper; handkerchiefs of paper; stationery; seals for office use; stickers; printed notepads; decorative stickers for portable game machines; printed instruction manuals; printed publications, namely, books, manuals, catalogs, pamphlets, and magazines in the field of computer games, video games, cartoons and music; printed picture books; printed calendars; printed trading cards, other than for games; printed photographs; photograph stands in Class 016.</p> <p>For: Clothing for domestic pets; bags, namely, carry-on bags, shoulder bags, school bags, traveling bags; pouches, namely, pouches of leather; boston bags; rucksacks; key cases; wallets; card cases being notecases, namely, credit card cases, business card cases; vanity cases, not fitted; umbrellas and their parts; walking sticks; canes; metal parts of canes and walking-sticks; handles for canes and walking sticks; saddlery in Class 018.</p> <p>For: Toy vehicles; dolls; plush dolls; stuffed toys; toy action figures; toy jewelry; bath toys; electronic action toys; plastic character toys; children's educational toys for developing cognitive skills; construction toys; puzzles; children's multiple activity toys; toy building sets comprised of toy building blocks; toy face masks; trading card games; playing cards; coin-operated video games; arcade game machines; arcade video game machines; amusement game machines with built-in</p>
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		<p>screens; arcade redemption game machines which dispense tickets or tokens to successful players; arcade crane game machines which dispense tickets or tokens to successful players in Class 028.</p> <p>For: Entertainment services, namely, providing on-line video games and on-line computer games; providing online information via a website on on-line games; providing non-downloadable on-line computer graphics, videos and images in the field of computer games, video games, cartoons and music; providing amusement facilities; organization, production and presentation of video and computer game events; arranging and conducting of game events in the nature of video game competitions and tournaments, online computer game competitions and tournaments; organization and arrangement of game tournaments in the nature of video game competitions and tournaments, online computer game competitions and tournaments; providing information about amusement facilities; providing on-line music, not downloadable; providing online non-downloadable electronic publications in the nature of books, manuals, catalogs, pamphlets, and magazines in the field of computer games, video games, cartoons and music; services of reference libraries for literature and documentary records; book rental; production of movies; presentation of movies, namely, movie theaters, planning arrangement of showing movies; presentation,</p>
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		conducting and arrangement of entertainment exhibitions in the nature of game shows, plays or musical performances; providing information relating to production of movies and presentation of movies, namely, movie theaters, planning arrangement of showing movies; providing information relating to presentation, conducting or arrangement of entertainment exhibitions in the nature of game shows, plays or musical performances; movie showing, movie film production, or movie film distribution; providing entertainment information relating to on-line graphics, movies, moving images, images, music and text; presentation of movies and moving images, namely, movie theaters, planning arrangement of showing movies; electronic publication of images in electronic form online in the field of computer games, video games, cartoons and music, other than for advertising purposes; providing online music, not downloadable; providing online electronic publications, not downloadable, in the nature of books, manuals, catalogs, pamphlets, and magazines in the field of computer games, video games, cartoons and music; providing information relating to multimedia publishing of graphics; providing information relating to presentation of movies and moving images, namely, movie theaters, planning arrangement of showing movies; providing information relating to electronic publication of images, including in electronic form, online in the field of computer games, video
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			<p>games, cartoons and music, other than for advertising purposes; providing information relating to providing online music, not downloadable; providing information relating to providing online electronic publications, not downloadable, in the nature of books, manuals, catalogs, pamphlets, and magazines in the field of computer games, video games, cartoons and music; electronic publishing services, namely, publication of text and graphic works of others on-line featuring characters of books, animated cartoons, toys, games; live presentation of still and moving images, namely, movie theaters, planning arrangement of showing still and moving images; presentation of live show performances; direction or presentation of plays; presentation of musical performances; on-line presentation of live show performances, plays or musical performances; providing entertainment information relating to on-line presentation of game show performances, plays or musical performances; providing on-line non-downloadable entertainment in the nature of presenting live show performances, plays or live musical performances; providing information relating to providing on-line non-downloadable entertainment in the nature of shows, plays or musical performances; production of shows, namely, production of television programs; production of live game shows; presentation of musical performances, direction or presentation</p>
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		<p>of plays and presentation of musical performances provided on-line from a computer network; providing non-downloadable digital images and music from the Internet; providing non-downloadable digital images and music relating to animated cartoons from the Internet; production of radio or television programs; on-line production of radio or television programs; production of radio or television programs and production of broadcast programs, using computer graphics; directing of radio and television programs; providing information relating to direction of radio and television programs; organization and provision of games and competitions via the internet in the nature of video game competitions and tournaments, online computer game competitions and tournaments; organization, arranging and conducting of game tournaments in the nature of video game competitions and tournaments, online computer game competitions and tournaments; organization, arranging and conducting of photo sessions; organizing and conducting of sporting and cultural events; rental of game machines and apparatus; organization of live entertainment events in the nature of concerts, video game and computer game tournaments, video game and computer game competitions via the internet; providing exercise facilities; rental of sports equipment, except vehicles; photography in Class 041.</p>
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6,144,484	LIKE A DRAGON	Sept. 8, 2020	<p>For: Downloadable computer game programs; recorded computer game programs; downloadable computer game software; recorded computer game software; downloadable video game software; recorded video game software; downloadable video game programs; recorded video game programs; video game discs and cartridges; downloadable computer game software for use on mobile and cellular phones; mobile phone straps; protective cases for cell phones; downloadable graphics, images and moving images for computers, video game machines or mobile phones featuring scenes and characters based on computer and video games; downloadable computer game and video game software; downloadable music files via a global computer network and wireless devices; sound recorded compact discs featuring music, video game sounds and dialogues; compact discs, magnetic tapes, and downloadable files featuring musical sound recordings; prerecorded video discs and magnetic tapes featuring music, comedy, drama, action, adventure and animation; electronic publications, namely, downloadable books and magazines in the field of computer games, video games, cartoons and music; phonograph records featuring music in Class 009.</p> <p>For: Entertainment services, namely, providing on-line video games and on-line computer games; providing entertainment information on on-line games; providing non-downloadable on-line computer graphics, moving images</p>
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			and images featuring scenes and characters based on computer and video games by computer networks, video game machines or mobile phones; providing amusement facilities; providing amusement arcade services; providing amusement parks; organization, production and presentation of video and computer game contests and tournaments; providing entertainment information about amusement facilities; providing on-line music, not downloadable in Class 041.
7,656,761	LIKE A DRAGON	Jan. 21, 2025	For: Pastes and other adhesives for stationery or household purposes; hygienic hand towels of paper; table napkins of paper; hand towels of paper; handkerchiefs of paper; stationery; stickers; printed matter, namely, printed comic books, instruction manuals in the field of video games, children's books, children's activity books, songbooks, children's magazines and magazines in the field of computer games, video games, cartoons and music; printed picture books and reference books in the field of computer games, video games, cartoons and music; printed catalogues in the field of computer games, video games, cartoons and music; printed calendars; printed general feature magazines in the field of computer games, video games, cartoons and music; printed books, namely, coloring books, date books; printed pamphlets in the field of computer games, video games, cartoons and music; printed trading cards other than for games;

			<p>printed instructional and teaching material in the field of computer games, video games, cartoons and music; printed photographs in Class 016.</p> <p>For: Clothing, namely, t-shirts, shirts, sweaters, sweatshirts, jackets, pajamas, coats, swimwear, mufflers as neck scarves, gloves, scarves, neck ties, socks, underwear, pants, jeans, shorts, skirts, underpants, robes; shoes; footwear; beach shoes; boots; galoshes; half-boots; lace boots; sandals; sneakers; sports shoes; wooden shoes; heels, namely, high-heel shoes; masquerade costumes; play costumes, namely, costumes for use in children's dress up play, costumes for use in role-playing games; clothes for sports, namely, sports jerseys and breeches for sports; boots for sports; headwear, namely hats and caps in Class 025.</p> <p>For: Coin-operated video games; arcade game machines; arcade video game machines; amusement game machines with built-in screens; toy vehicles; dolls; stuffed toys; toy action figures; trading card games; playing cards; arcade redemption game machines which dispense tickets or tokens to successful players; arcade crane game machines which dispense tickets or tokens to successful players; gaming machines, namely, slot machines in Class 028.</p>
6,144,484	LIKE A DRAGON	Sept. 8, 2020	For: Downloadable computer game programs; recorded computer game programs; downloadable computer game software; recorded computer game

		<p>software; downloadable video game software; recorded video game software; downloadable video game programs; recorded video game programs; video game discs and cartridges; downloadable computer game software for use on mobile and cellular phones; mobile phone straps; protective cases for cell phones; downloadable graphics, images and moving images for computers, video game machines or mobile phones featuring scenes and characters based on computer and video games; downloadable computer game and video game software; downloadable music files via a global computer network and wireless devices; sound recorded compact discs featuring music, video game sounds and dialogues; compact discs, magnetic tapes, and downloadable files featuring musical sound recordings; prerecorded video discs and magnetic tapes featuring music, comedy, drama, action, adventure and animation; electronic publications, namely, downloadable books and magazines in the field of computer games, video games, cartoons and music; phonograph records featuring music in Class 009.</p> <p>Entertainment services, namely, providing on-line video games and on-line computer games; providing entertainment information on on-line games; providing non-downloadable on-line computer graphics, moving images and images featuring scenes and characters based on computer and video games by computer networks, video game machines or mobile phones; providing</p>
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			amusement facilities; providing amusement arcade services; providing amusement parks; organization, production and presentation of video and computer game contests and tournaments; providing entertainment information about amusement facilities; providing on-line music, not downloadable in Class 041.
7,602,473	LIKE A DRAGON INFINITE WEALTH	Dec. 17, 2024	For: Downloadable computer game programs; recorded computer game programs; downloadable computer game software; recorded computer game software; downloadable video game software; recorded video game software; downloadable video game programs; recorded video game programs; video game discs and cartridges; downloadable computer game software for use on mobile and cellular phones; mobile phone straps; protective cases for cell phones; downloadable multimedia files featuring graphics, images, and video recordings for computers, video game machines and mobile phones featuring scenes and characters based on computer and video games; downloadable computer game and video game software; downloadable music files for use with global computer networks and wireless devices; sound recordings being compact discs featuring music, video game sounds; prerecorded audio and video compact discs, magnetic audio tapes, and downloadable multimedia files featuring music; prerecorded video discs and magnetic audio tapes

			<p>featuring music, comedy, drama, action, adventure and animation; downloadable electronic publications, namely, downloadable books and magazines in the field of computer games, video games, cartoons and music; phonograph records featuring music in Class 009.</p> <p>For: Entertainment services, namely, providing on-line video games and on-line computer games; providing entertainment information in the field of on-line games; providing non-downloadable on-line computer video files and image files featuring scenes and characters based on computer and video games that are viewed online via computer networks, video game machines and mobile phones; providing amusement facilities; providing amusement arcade services; providing amusement parks; organization, production and presentation of video and computer game contests and tournaments; providing entertainment information about amusement facilities; providing on-line music, not downloadable in Class 041.</p>
7,349,592	LIKE A DRAGON ISHIN	Apr. 9, 2024	<p>For: Downloadable computer game programs; recorded computer game programs; downloadable computer game software; recorded computer game software; downloadable video game software; recorded video game software; downloadable video game programs; recorded video game programs; video game discs and cartridges; downloadable computer game software for use on mobile and cellular phones; mobile phone</p>

		<p>straps; protective cases for cell phones; downloadable graphics, images, and video recordings for computers, video game machines and mobile phones featuring scenes and characters based on computer and video games; downloadable computer game and video game software; downloadable music files via a global computer network and wireless devices; sound recordings recorded on compact discs featuring music, video game sounds and dialogues; prerecorded compact discs, magnetic audio tapes, and downloadable files featuring music; prerecorded video discs and magnetic audio tapes featuring music, comedy, drama, action, adventure and animation; electronic publications, namely, downloadable books and magazines in the field of computer games, video games, cartoons and music; phonograph records featuring music in Class 009.</p> <p>For: Entertainment services, namely, providing on-line video games and on-line computer games; providing entertainment information on on-line games; providing non-downloadable on-line computer graphics, videos, and images featuring scenes and characters based on computer and video games that are viewed online via computer networks, video game machines and mobile phones; providing amusement facilities; providing amusement arcade services; providing amusement parks; entertainment services, namely, organization, production and presentation of video and computer game contests and tournaments; providing entertainment information about</p>
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			amusement facilities; providing on-line music, not downloadable in Class 041.
6,127,048	 RYU GA GOTOKU STUDIO	Aug. 18, 2020	<p>For: Downloadable computer game programs; recorded computer game programs; downloadable computer game software; recorded computer game software; downloadable video game software; recorded video game software; downloadable video game programs; recorded video game programs; video game discs and cartridges; downloadable computer game software for use on mobile and cellular phones; mobile phone straps; protective cases for cell phones; downloadable graphics, images and moving images for computers, video game machines or mobile phones featuring scenes and characters based on computer and video games; downloadable computer game and video game software; downloadable music files via a global computer network and wireless devices; sound recorded compact discs featuring music, video game sounds and dialogues; compact discs, magnetic tapes, and downloadable files featuring musical sound recordings; prerecorded video discs and tapes featuring music, comedy, drama, action, adventure and animation; electronic publications, namely, downloadable books and magazines in the field of computer games, video games, cartoons and music; phonograph records featuring music in Class 009.</p> <p>For: Coin-operated video games; arcade</p>

			<p>game machines; arcade video game machines; amusement game machines with built-in screens; toy vehicles; dolls; stuffed toys; toy action figures; trading card games; playing cards; arcade redemption game machines which dispense tickets or tokens to successful players; arcade crane game machines which dispense tickets or tokens to successful players in Class 028.</p> <p>Entertainment services, namely, providing on-line video games and on-line computer games; providing entertainment information on on-line games; providing non-downloadable on-line computer graphics, moving images and images featuring scenes and characters based on computer and video games by computer networks, video game machines or mobile phones; providing amusement facilities; providing amusement arcade services; providing amusement parks; organization, production and presentation of video and computer game contests and tournaments; providing entertainment information about amusement facilities; providing on-line music, not downloadable in Class 041.</p>
4,251,208		Nov. 27, 2012	For: video game software; downloadable graphics, images and moving images for computers in Class 009.
1,566,116		Nov. 14, 1989	For: Video game attachments for television sets, namely, video game control sticks, video game programs recorded on integrated circuits in the form of cartridges and cards in Class 028.

5,808,893		Jul. 23, 2019	<p>For: Apparatus and instruments for conducting, switching, transforming, accumulating, regulating or controlling electricity; apparatus for recording, transmission or reproduction of sound or images; prerecorded magnetic data carriers, recording discs, compact discs, DVDs and computer media featuring scenes and characters from computer and video games; mechanisms for coin-operated apparatus; cash registers, calculating machines, data processing equipment, computers; computer software for playing video games; computer software for database management; computer software for controlling and managing business data; fire-extinguishing apparatus; computer software development tools; downloadable computer file sharing software to enable uploading, downloading, accessing, posting, displaying, tagging, blogging, streaming, linking, sharing or otherwise providing electronic media or information via computer and communication networks; computer programs, namely, downloadable software for playing video games; programs for cell phones, namely, downloadable software for playing video games; game programs for smartphones, namely, downloadable computer game software; programs for smartphones, namely, downloadable software for playing video games;</p>

		downloadable computer game programs for handheld terminals; coils, electric; particle accelerators; reflecting discs for wear, for the prevention of traffic accidents; clothing for protection against accidents, irradiation and fire; accumulator jars; battery boxes; acidimeters for batteries; hydrometers; plates for batteries; whistle alarms; acoustic sound alarms; acoustic conduits; speaking tubes; actinometers; adding machines; aerometers; enlarging apparatus for photography; electrodynamic apparatus for the remote control of railway points; magnets; electromagnetic coils; air analysis apparatus; alcoholometers; alidades; igniting apparatus, electric, for igniting at a distance, namely, remote control starters for vehicles; batteries for lighting; altimeters; asbestos gloves for protection against accidents; asbestos clothing for protection against fire; ammeters; amplifiers; amplifying tubes for amplifiers; anemometers; fire extinguishers; anodes; anode batteries; electrical transformers; optical apertometers; money counting and sorting machines; surveying instruments; surveying chains; lenses for astrophotography; mechanisms for coin-operated apparatus; comparators; fire alarms; automatic indicators of low pressure in vehicle tires; protective suits for aviators; alarm bells, electric for use with burglar alarms; rods for water diviners; life-saving rafts; scales; meteorological balloons; demagnetizing apparatus for magnetic tapes; tape recorders; blank magnetic computer
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			tapes; barometers; weighing machines; weighbridges; fire beaters; chargers for electric batteries; betatrons; ticket dispensers, namely, video lottery ticket terminals, electronic parking lot ticket dispensers; cabinets for loudspeakers; close-up lenses; electricity terminals; pressure indicator plugs for valves; galvanometers; electrical push buttons for door bells; electrical branch distribution boxes; tone arms for record players; spirit levels; punched card machines for offices; sheaths for electric cables; frames for photographic transparencies; circular slide rules; slide-rules; slide calipers; blueprinting machines; cinematographic cameras; capillary tubes for laboratory research use; protective helmets; respiratory masks, other than for artificial respiration or medical purposes; solderers' helmets; eyeglass chains; photography darkroom equipment, namely, lamps; boiler control instruments; drying racks for photography; editing appliances for cinematographic films; printed circuits; blinkers being traffic light signalling lights; signal bells; containers for microscope slides; electric installations for the remote control of industrial operations; switchboxes for electricity; commutators; marine compasses; eyepieces, namely, spectacles; thread counters; pedometers; metronomes; condensers; conductors, electric; electricity conduits; circuit closers; electrical connectors; junction boxes; contacts, electric; regulating apparatus, electric; speed checking apparatus for
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		<p>vehicles, namely, laser speed detectors; converters, electric; photographic, electrostatic, and thermic photocopiers; eyeglass cords; correcting lenses; objectives lenses; diving suits; electric apparatus for commutation, namely, commutators; switches, electric; electricity limiters; electrical connections, namely, sockets, plugs and other contacts; current rectifiers; cell switches for electricity; dressmakers' tape measures; crucibles for laboratory use; appliances for measuring the thickness of leather; cyclotrons; counterfeit false coin detectors; shutter release; densimeters; video disks and tapes with recorded animated cartoons; laboratory trays; metal detectors for industrial or military purposes; sonars; shutters for cameras; acoustics diaphragms for use in sound recording; centering apparatus for photographic transparencies; cameras; photographic transparencies; slide projectors; dictating machines; diffraction apparatus for use in microscopy; loudspeakers; circuit breakers; record players; microscopes; distance recording apparatus; range finders; distribution boards for use with electricity; distribution consoles for use with electricity; compasses being measuring instruments; tape measures; dynamometers; water level indicators; fire escapes, namely, ladders; flash-bulbs for photography; telephone receivers; fluorescent screens; projection screens; workmen's protective face-shields; screens for photography; drainers for use in photography; electric</p>
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		loss indicators; cables, electric; electricity ducts; control panels for use in electricity; connections for electric lines; couplings, electric; relays, electric; electrolyzers; transmitters of electronic signals; transmitting sets comprising transmitters for use in telecommunication; blank sound recording magnetic strips; spools for cameras; mechanical signs; epidiascopes; test tubes for laboratory use; balancing apparatus namely, balances; thermostats; egg-candlers; fuel gauges; gasoline gauges; spark-guards for protection against injury; cases especially made for photographic apparatus and instruments, namely, video cameras; refractometers; exposure meters being light meters; invoicing machines, namely, printers; apparatus for fermentation being laboratory apparatus; wires, electric; magnetic wires; plumb bobs; plumb lines; nets for protection against accidents; safety nets; safety tarpaulins; film cutting apparatus; filters for respiratory masks for laboratory use; camera filters for use in photography; battery chargers; frequency meters; fuses; radios; galena crystals detectors for use in electronics; galvanic batteries; gloves for protection against accidents; gloves for divers; gloves for protection against X-rays for industrial purposes; gas testing instruments; gasometers being measuring instruments; surveying apparatus and instruments; leveling staffs being surveying instruments; drying apparatus for photographic prints; glazing apparatus for
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		photographic prints; rulers being measuring instruments; measuring glassware; screens for photoengraving; grids for batteries; clothing for protection against fire; audio- and video-receivers; heliographic apparatus; hygrometers; identification threads for electric wires; identification sheaths for electric wires; life saving apparatus and equipment, namely, flotation vests; fire hose nozzles; fire engines; fire trucks; slope indicators; taximeters; quantity indicators; vacuum gauges; speed indicators; electricity inductors; armatures for use in electricity apparatus; data processing apparatus; mirrors for inspecting work; carriers for dark plates in photography; electricity inverters; ionizers for scientific or laboratory use; peepholes, namely, magnifying lenses for doors; furniture especially made for laboratories; lactodensimeters; lactometers; darkroom lamps for photography; magic lanterns; signal lanterns for safety purposes; lasers, not for medical purposes; optical lenses; letter scales; magnifying glasses; signs, luminous; neon signs; spectacles; surveyors' levels; spectacle lenses; pressure gauges; periscopes; coin-operated mechanisms for television sets; megaphones; computer memory devices; carpenters' rules; mercury levels; speed measuring apparatus for use in photography; microphones; microtomes; time switches, automatic; optical mirrors; breathing apparatus for underwater swimming; electric navigational instruments; spectacle frames; batteries, electric; accumulators,
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			electric; optical prisms for scientific purposes; octants; ohmmeters; wavemeters; optical glass for use with spectacles; computers; oscillographs; oxygen transvasing apparatus; ozonisers; micrometers; signaling panels, luminous or mechanical for traffic purposes; lightning conductors being rods; parking meters; apparatus for measuring the thickness of skins for laboratory use; acid hydrometers; weighing apparatus and instruments; salinometers; washing trays for use in photography; stands for photographic apparatus; viewfinders, photographic; photometers; phototelegraphy apparatus; pince-nez; pipettes; plane tables being surveying instruments; planimeters; ear plugs for divers; bells for use as warning devices; test weights; polarimeters; radiotelephony sets; radiotelegraphy sets; pressure measuring apparatus; pressure indicators; mouth guards for athletic use; pyrometers; radar apparatus; vehicle radios; protractors being measuring instruments; apparatus and installations for the production of X-rays, not for medical purposes; X-ray tubes not for medical purposes; protection devices against X-rays, not for medical purposes; telephone apparatus; refractors for laboratory use; X-ray apparatus not for medical purposes; spectroscopes; resistances, electric; thermometers, not for medical purposes; respirators for filtering air other than for artificial respiration; breathing apparatus, except for artificial respiration for underwater use; rheostats; balances for use in steelyards;
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		emergency signals, luminous or mechanical; saccharometers; electrical probes for scientific purposes; satellites for scientific purposes; choking coils for electrical impedance; electricity wire connectors; locks, electric; sextants; signaling whistles; vehicle breakdown warning triangles; electro-dynamic apparatus for the remote control of signals; simulators for the steering and control of vehicles; sirens; sound transmitting apparatus; sound recording apparatus; sound reproduction apparatus; spherometers; stereoscopes; needles for record players; sulfitometers; teleprinters; tachometers; screw-tapping gauges; telegraph transmitting apparatus; television apparatus for projection purposes; telegraph wires; masts for wireless aerials; teleprompters; telephone transmitters; teleruptors; binoculars; telescopes; temperature indicators; time recording apparatus; theodolites; thermostats for vehicles; revolution counters; speed regulators for record players; television transmitters; radio transmitters; precision balances; marking gauges for joinery; vacuum tubes for radios; urinometers; variometers; verniers; blank videotapes; viscosimeters; voltage regulators for vehicles; voting machines; voltmeters; apparatus for changing record player needles; stills for laboratory experiments; fuse wire; anticathodes; dog whistles; electrical anti-theft warning apparatus for personal use; beacons, luminous; holders for electric coils; photographic films, exposed; road signs, luminous or mechanical; life
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			buoys; signaling buoys; electric buzzers; directional compasses; fog signals, non-explosive; cash registers; radiology screens for industrial purposes; identity cards, magnetic; photovoltaic cells; densitometers not for medical use; blank disks, magnetic; blank floppy disks; head cleaning tapes for use in recording sound and video; video recorders; computer keyboards; integrated circuits; semi-conductors; integrated circuit chips; cathodes; life jackets; life belts; cinematographic film, exposed; materials for electricity mains, namely, wires, cables; contact lenses; containers for contact lenses; incubators for bacteria culture; solar batteries; copper wire, insulated; discharge tubes, electric, other than for lighting; diaphragms for use in photography; distillation apparatus for scientific purposes; dosage dispensers, namely, machines for dispensing pre-determined dosages of medication; electric door bells; spectacle cases; furnaces for laboratory use; optical fibers, namely, fibers being light conducting filaments; telephone wires; x-ray films, exposed; filters for ultraviolet rays, for photography; horns for loudspeakers; tripods for cameras; bar code readers; bullet-proof waistcoats and vests; marking buoys; wafers for integrated circuits; chromatography apparatus for laboratory use; chronographs being time recording apparatus; blank compact discs for audio-video; blank compact discs for read-only memory; computer peripheral devices; optical condensers; acoustic couplers; couplers being data processing
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		equipment; decompression chambers; plotters; divers' masks; electronic pens with visual display units; encoded magnetic cards, namely, charge cards, debit cards, identify cards; facsimile machines; fire boats; interfaces for computers; juke boxes for computers; knee-pads for workers; light dimmers being electric regulators; magnetic encoders; magnetic tape units for computers; microprocessors; modems; monitors being computer hardware; computer monitors; mouse being a computer peripheral; optical character readers; printers for use with computers; processors being central processing units; readers being data processing equipment; scanners being data processing equipment; smoke detectors; electronic transistors; x-ray photographs, other than for medical purposes; junction sleeves for electric cables; abacuses; electronic agendas; answering machines; camcorders; cassette players; compact disc players; disk drives for computers; electrified rails for mounting spot lights for emergency use; electronic pocket translators; electronic tags for goods; fire blankets; flashlights for use in photography; integrated circuit cards, namely, blank smart cards; measuring spoons; notebook computers; electronic notice boards; pocket calculators; shoes for protection against accidents, irradiation and fire; sprinkler systems for fire protection; battery starter cables for motors; sunglasses; time clocks being time recording devices; blank video cassettes; video game cartridges; video screens; video telephones; goggles
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		for sports; nose clips for divers and swimmers; protective helmets for sports; downloadable electronic publications, namely, books featuring scenes and characters from computer and video games; navigation apparatus for vehicles being on-board computers; decorative magnets; cordless telephones; mouse pads; personal stereos; wrist rests for use with computers; coaxial cables; fiber optic cables; covers for electric outlets; marine depth finders; electrified fences; computer game software; headphones; lighting ballasts; radio pagers; satellite navigational apparatus, namely, GPS; solenoid valves being electromagnetic switches; voltage surge protectors; walkie-talkies; wind socks for indicating wind direction; light-emitting electronic pointers; resuscitation mannequins being teaching apparatus; stage lighting electrical regulators; egg timers, namely, sandglasses; DNA chips; DVD players; automated teller machines (ATM); traffic-light apparatus being signaling devices; hands free kits for phones; asbestos screens for firemen; riding helmets; clothing especially made for laboratories; encoded identification bracelets, magnetic; transponders; downloadable ring tones for mobile phones; downloadable music files; downloadable image files; crash test dummies; laboratory centrifuges; printed circuit boards; blank USB flash drives; global positioning system (GPS) apparatus; portable media players; cell phone straps; light emitting diodes (LEDs); triodes; step-up transformers; laptop computers; fire hose; bags
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			<p>adapted for laptops; sleeves for laptops; digital photo frames; petri dishes; pitot tubes; stroboscopes; safety traffic cones; temperature indicator labels, not for medical purposes; electronic book readers; smartphones; toner cartridges, unfilled, for printers and photocopiers; baby monitors; video baby monitors; lens hoods; tablet computers; encoded key cards; 3D spectacles; memory cards for video game machines; bullet-proof clothing; accelerometers; electrical adapters; life-saving capsules for natural disasters; computer hardware; solar panels for the production of electricity; telescopic sights for artillery; digital signs; electronic sports training simulators; computer game cartridges; computer game programs; computer game software downloadable from a global computer network; computer programs for video and computer games; interactive multimedia computer game programs; computer game discs; downloadable computer game programs; electronic game programs; electronic game software; interactive video game programs; recorded computer game programs; video game discs; video game programs; video games software; virtual reality game software; audio tapes featuring music; cases for telephones; cellular phones; compact discs featuring music; prerecorded audio tapes featuring music; prerecorded video cassettes featuring music in Class 009.</p> <p>For: Printed matter namely, comic books, video game instruction manuals, children's books, children's activity</p>
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		books, songbooks, children's magazines, magazines and pamphlets featuring information and articles about fashion and games; bookbinding material; photographs; stationery; adhesives for stationery or household purposes; paint brushes; printers' type; printing blocks; steel letters for use in printing; steel pens; adhesive tape dispensers being office requisites; address stamps; addressing machines; paper; posters; printed advertisement boards of paper or cardboard; franking machines for office use; clips for letters; paper clips; binder clips; clips for name badge holders; pen clips; stapling presses; photo albums; pictures; print engravings; cigar bands; pencil sharpening machines, electric or non-electric; bookends; hand-rests for painters; aquarelles; architects' models; document files being stationery; writing slates; slate pencils; silver paper; modelling clay; printed arithmetical tables; print engravings; lithographic works of art; paintings and pictures, framed or unframed; pencils; newspapers; atlases; loose-leaf binders; gummed tape; place mats of paper for beer glasses; printed tickets; printing blocks; drawing pads; pads for writing being stationery; spools for inking ribbons; wristbands for the retention of writing instruments; pamphlets in the field of computer games, video games, animated films and animated cartoons; embroidery designs being printed patterns; drawing pins; moisteners being office requisites; painters' brushes; blotters; stamps seals; sealing stamps; inking pads; sealing wax; envelope
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		sealing machines for offices; sealing compounds for stationery purposes; writing or drawing books; trays for sorting and counting money; tracing patterns; tracing paper; tracing cloth; finger-stalls being office requisites; printing type; carbon paper; paper for recording machines; note books; square rulers for drawing; greeting cards; index cards; paper sheets for note taking; cardboard; hat boxes of cardboard; perforated cards for jacquard looms; cardboard tubes; catalogs in the field of computer games, video games, animated films and animated cartoons; tags for index cards; song books; composing frames for printing; folders for papers; painters' easels; numbers for printing type; Indian inks; chromolithographs; modelling wax, not for dental purposes; paper files; office perforators; toilet paper; books in the field of computer games, video games, animated films and animated cartoons; compasses for drawing; printers' type numerals and letters; letter trays; conical paper bags; correcting fluids for type; correcting ink for use in heliography; pencil leads; histological sections for teaching purposes; French curves; book covers; writing chalk; chalk for lithography; tailors' chalk; writing chalk and marking chalk holders; pencil holders; pencil lead holders; cream containers of paper, namely, paper boxes for use as food packaging; paper clasps; rollers for typewriters; transfers being decalcomanias; graphic prints; graining combs; drawing boards; drawing instruments; diagrams for building
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			computer circuits; envelopes for use as stationery; duplicators, namely, duplicating paper, machines, ink; etchings; packing paper; pen nibs; typewriters, electric or non-electric; pen cases; nibs of gold for pens; erasing products, namely, erasers; drawing shields; erasing shields; rubber erasers; electrocardiograph paper; hand-operated and electric hole punches being office requisites; writing and drawing ink; inking ribbons; inkwells; envelope sealing machines for offices; printed, photographs; pen wipers; sealing stamps; fabrics for bookbinding; ledger books; telephone indexes; figurines being statuettes of papier mâché; filter paper; filtering materials in the nature of paper; forms, printed; charcoal pencils; stencils; galley racks for printing; electrotypes; geographical maps; terrestrial globes; artists' watercolor saucers; graphic art reproductions; graphic representations; scrapers being erasers for offices; engraving plates; hectographs; printed timetables; moisteners for gummed surfaces being office requisites; postcards; hand labeling appliances, namely, label printing machines; printers' blankets, not of textile; manuals being handbooks in the field of computer games, video games, animated films and animated cartoons; writing paper; paperweights; tracing needles for drawing purposes; drawing pens; table linen of paper; lithographs; lithographic stones; booklets in the field of computer games, video games, animated films and animated cartoons; luminous paper;
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			<p>papier mâché; manifold paper; marking chalk; plastics for modeling, namely, polymer modelling clay; modelling compounds; modelling paste; handkerchiefs of paper; inking sheets for duplicators; tablecloths of paper; blackboards; paper-clips; oleographs; binding strips for use in bookbinding; sealing wafers for stationery purposes; palettes for painters; pantographs being drawing instruments; stationery; parchment paper; pastels being crayons; printed sewing patterns; stencil cases; house painters' rollers; canvas for painting; paint boxes being articles for use in school; plastic film for wrapping; apparatus for mounting photographs, namely, photograph mounts; photograph stands; photo-engravings; blueprints; stationery folders; fountain pens; stencil plates; stencils; portraits; flower-pot covers of paper; mimeograph apparatus and machines; paper tapes and cards for the recordal of computer programs; printed prospectuses in the field of computer games, video games, animated films and animated cartoons; paper for radiograms; drawing rulers; printers' reglets; bookbinding material; bookbindings; cloth for bookbinding; cords for bookbinding; inking sheets for document reproducing machines; pens being office requisites; magazines in the field of computer games, video games, animated films and animated cartoons; paper ribbons; typewriter ribbons; bags of paper or plastics, for merchandise packaging; stamp pads; school supplies, namely, stationery; bookmarks; greeting cards; steatite tailor's chalk;</p>
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			balls for ball-point pens; tablemats of paper; desk mats; typewriter keys; holders for stamping seals; cases for stamping seals; postage stamps; stamp stands; paper transparencies; gluten glue for stationery or household purposes; adhesives glues for stationery or household purposes; adhesive tapes for stationery or household purposes; adhesive bands for stationery or household purposes; address plates for addressing machines; almanacs; calendars; starch paste adhesive for stationery or household purposes; paintbrushes; self-adhesive tapes for stationery or household purposes; elastic bands for offices; bibs of paper; wood pulp paper board for stationery purposes; wood pulp paper; boxes of cardboard or paper; stands for pens and pencils; bottle envelopes of cardboard or paper; coasters of paper; announcement cards; plastic bubble packs for wrapping or packaging; flags of paper; paper shredders for office use; sheets of reclaimed cellulose for wrapping; desktop cabinets for stationery; glue for stationery or household purposes; paper knives being letter openers; garbage bags of paper or of plastics; pencil sharpeners, electric or non-electric; tissues of paper for removing make-up; table napkins of paper; place mats of paper; drawing squares; drawing t-squares; penholders; inkstands; writing cases, namely, sets of pencils; bottle wrappers of cardboard or paper; placards of paper or cardboard; towels of paper; face towels of paper; labels of paper, cardboard; etching needles;
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			viscose sheets for wrapping; gums being adhesives for stationery or household purposes; gummed cloth for stationery purposes, namely, bookbinding; isinglass for making glue for stationery or household purposes; bags for microwave cooking; paper coffee filters; plastic cling film, extensible, for palletization; inking ribbons for computer printers; signboards of paper or cardboard; stickers; bookbinding apparatus in the nature of machines being office equipment; comic books; copying paper; holders for checkbooks; ink sticks; ink stones; musical greeting cards; newsletters in the field of computer games, video games, animated films and animated cartoons; packaging material made of paper based starches; waxed paper; passport holders; writing brushes; writing instruments; drawer liners of paper, perfumed or not; credit card imprinters, non-electric; document laminators for office use; Xuan paper for Chinese painting and calligraphy; writing board erasers; clipboards; chart pointers, non-electronic; paper bows for gift wrapping; moulds for modeling clays being artists' materials; money clips; trading cards other than for games; absorbent sheets of paper or plastic for foodstuff packaging; humidity control sheets of paper or plastic for foodstuff packaging; correcting tapes being office requisites; paint trays; marking pens; informational flyers in the field of computer games, video games, animated films and animated cartoons; document holders; page holders; polymer modelling clay; packing, cushioning,
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		<p>and stuffing materials of paper or cardboard; stuffing of paper or cardboard; paper tags; printed lottery tickets other than toys; computer game instruction manuals; computer user manuals in Class 016.</p> <p>For: Clothing, namely, tops, bottoms, shirts; footwear other than special footwear for sports; headwear; non-slipping devices for footwear, namely, soles; motorists' clothing, namely, tops, bottoms, shirts; bath sandals; bath slippers; stockings; sweat-absorbent stockings; heelpieces for stockings; berets; overalls; boas being necklets; caps being headwear; hosiery; half-boots; tips for footwear; dress shields; lace boots; collars as clothing; camisoles; boxer shorts; skull caps; bodices being lingerie; underwear; hoods as clothing; hat frames; cap peaks; belts; shawls; dressing gowns; sweaters; chasubles; socks; sock suspenders; garters; stocking suspenders; boot uppers; inner soles; shirts; shirt fronts; short-sleeve shirts; hats; head wear; fittings of metal for footwear; furs being clothing; detachable collars; tights; wet suits for water-skiing; combinations; corselets; suits; ready-made clothing, namely, tops, bottoms, shirts; babies' pants; ear muffs; neckties; footwear uppers; breeches for wear; trousers; cyclists' clothing, namely, tops, bottoms, shirts; outer clothing, namely, tops, bottoms, shirts; gloves; ready-made linings being parts of clothing; sashes for wear; knitwear clothing, namely, shirts,</p>
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			<p>dresses, sweaters; shirt yokes; esparto shoes or sandals; fur stoles; top hats; gabardines; corsets being clothing; corsets being foundation clothing; girdles; galoshes; wimples; gymnastic shoes; coats; waterproof clothing, namely, tops, bottoms, shirts; leggings, namely, leg warmers; jerseys; skirts; clothing layettes; liveries; sports jerseys not for athletic purposes; cuffs; aprons being clothing; muffs; maniples; mittens; slippers; pelerines; pelisses; beach clothes, namely, tops, bottoms, shirts; beach shoes; pockets for clothing; dresses; wooden shoes; sandals; underpants; brassieres; overcoats; heelpieces for footwear; togas; welts for footwear; uniforms; stuff jackets; jackets; paper clothing, namely, tops, bottoms, shirts; veils; bathing caps; bathing trunks; bathing suits; bath robes; bibs, not of paper; soles for footwear; heels; footmuffs, not electrically heated, for use as clothing; studs for football boots; headbands; parkas; petticoats; ski boots; slips as undergarments; teddies as undergarments; bandanas being neckerchiefs; clothing for gymnastics, namely, tops, bottoms, shirts; clothing of imitations of leather, namely, tops, bottoms, shirts; clothing of leather, namely, tops, bottoms, shirts; mantillas; masquerade costumes; saris; tee-shirts; turbans; ascots; shower caps; fishing vests; money belts as clothing; pocket squares; paper hats as clothing; sleep masks; skorts; ponchos; sarongs; ski gloves; leggings in the nature of trousers; jumper dresses; visors being headwear; sports singlets; valenki being</p>
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		<p>felted boots; albs in Class 025.</p> <p>For: Decorations for Christmas trees; bladders of balls for games; artificial fishing bait; caps for toy pistols; toys for domestic pets; ring games; Christmas trees of synthetic material; bows for archery; archery implements; edges of skis; swings; balls for games; play balloons; billiard table cushions; rocking horses; batting gloves; dolls' feeding bottles; stationary exercise bicycles; billiard balls; chalk for billiard cues; billiard markers; skittles; marbles for games; building blocks as toys; bobsleighs; explosive bonbons, namely, Christmas crackers; skating boots with skates attached; candle holders for Christmas trees; balls for playing games and sports; bowling apparatus and machinery; boxing gloves; gut for rackets; golf clubs; rods for fishing; kites; kite reels; targets; bells for Christmas trees; counters being discs for games; building games; strings for rackets; machines for physical exercises; body-building apparatus; novelties for parties and dances in the nature of paper party favors; shin guards being sports articles; cricket bags, namely, bags specially designed to hold cricket equipment; hockey sticks; dice; chest expanders being exercisers; discusses for sports; dominoes; chess games; chessboards; toy pistols; rollers for stationary exercise bicycles; landing nets for anglers; golf bags, with or without wheels; nets for sports; tennis nets; ski bindings; darts; floats for fishing; foosball tables; harpoon guns; gloves for</p>
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			games; cups for dice; bar-bells; fish hooks; baby rattles; clay pigeon traps; rackets; decoys for hunting or fishing; fishing tackle; lines for fishing; dolls' beds; dolls' houses; puppets; dolls; theatrical masks; carnival masks; scale model vehicles; reels for fishing; flippers for swimming; creels as fishing traps; swimming pools being play articles; artificial snow for Christmas trees; quoits; roller skates; ice skates; seal skins being coverings especially adapted for skis; clay pigeons as targets; surfboards; dolls' clothes; dolls' rooms; Playing cards for use in magic tricks; skittles games; gut for fishing; sole coverings for skis; skis; tables for table tennis; spinning tops as toys; sleds being sports articles; backgammon games; scooters as toys; shuttlecocks; air pistols being toys; percussion caps being toys; ornaments for Christmas trees, except illumination articles and confectionery; Christmas tree stands; billiard cues; billiard cue tips; billiard tables; coin-operated billiard tables; surf skis; sailboards; hang gliders; appliances for gymnastics; fencing weapons; fencing masks; fencing gauntlets; baseball gloves; climbers' harness; elbow guards being sports articles for athletic use; knee guards being sports articles for athletic use; mobiles as toys; paragliders; protective paddings being parts of sports suits for athletic use; skateboards; toy slides; spring boards; teddy bears; water skis; golf gloves; bite indicators as fishing tackle; bite sensors as fishing tackle; board games; fairground ride apparatus; flying discs
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		toys; horseshoe games; mah-jong; plush toys; soap bubble making wand and solution sets; toy vehicles; twirling batons; butterfly nets; bags especially designed for skis and surfboards; harness for sailboards; jigsaw puzzles; masts for sailboards; paintball guns; paintballs ammunition for paintball guns; surfboard leashes; tennis ball throwing apparatus; starting blocks for sports; snow globes; weight lifting belts; bodyboards; bingo cards; divot repair tools as golf accessories; hunting game calls; roulette wheels; in-line roller skates; pinatas; punching bags; radio-controlled toy vehicles; rosin used by athletes; snowshoes; sling shots being sports articles; amusement machines, automatic and coin-operated; kaleidoscopes; playing cards; confetti; electronic targets for sports; scent lures for hunting or fishing; camouflage screens; men's athletic supporters; snowboards; scale model kits as toys; pachinkos; ascenders being mountaineering equipment; slot machines being gaming machines; paper party hats; swimming kick boards; chips for gambling; scratch cards for playing lottery games; stuffed toys; trampolines; poles for pole vaulting; water wings; swimming belts; swimming jackets; video game machines; portable games with liquid crystal displays; arcade video game machines; controllers for game consoles; toy models; toy figures; ball pitching machines; dumb-bells; masks as playthings; matryoshka dolls being wooden nested Russian dolls; controllers for toys, namely, cars,
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			<p>robots, and planes; action figure toys; electronic action toys; mechanical and electronic action toys; amusement park rides in Class 028.</p> <p>For: Advertising services; business management; business administration; providing office functions; business management assistance; business inquiries; bill-posting; import-export agencies; commercial information agencies; cost price analysis; dissemination of advertising matter; photocopying services; employment agencies; book-keeping; drawing up of statements of accounts, namely, administration, billing and reconciliation of accounts on behalf of others; business auditing; business management and organization consultancy; personnel management consultancy; business management consultancy; typing; demonstration of goods; direct mail advertising services; commercial and industrial management assistance; document reproduction; updating of advertising material; distribution of samples; business efficiency expert services; auctioneering; conducting marketing studies; business appraisals; business investigations; publicity material rental; business organization consultancy; publication of publicity texts; radio advertising; business research; public relations; shorthand services; television advertising; transcription of communications; shop window dressing; services of advertising agencies; advisory services for business management; modelling for advertising</p>
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			<p>or sales promotion; marketing research; computerized file management; professional business consultancy; economic forecasting services; organization of exhibitions for commercial or advertising purposes; business information; public opinion polling; payroll preparation; personnel recruitment; relocation services for businesses; rental of advertising space; sales promotion for others; secretarial services; tax preparation; telephone answering for unavailable subscribers; word processing; arranging newspaper subscriptions for others; advertising by mail order; business management of hotels; business management of performing artists; compilation of information into computer databases; systemization of information into computer databases; organization of trade fairs for commercial or advertising purposes; rental of photocopying machines; on-line advertising on a computer network; rental of advertising time on communication media; news clipping services; rental of vending machines; psychological testing for the selection of personnel; price comparison services; presentation of goods on communication media, for retail purposes, namely, television home shopping services; commercial information and advice for consumers in the nature of a consumer advice shop; arranging subscriptions to telecommunication services for others; administrative processing of purchase orders; commercial administration of the licensing of the goods and services of</p>
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		<p>others; outsourcing services, namely, business management, administration and consultancy; invoicing; writing of publicity texts; compilation of statistics; layout services for advertising purposes; sponsorship search; organization of fashion shows for promotional purposes; production of advertising films; business management of sports people; marketing services; telemarketing services; retail store and wholesale store services featuring pharmaceutical, veterinary and sanitary preparations and medical supplies; rental of sales stands; provision of commercial and business contact information; search engine optimization for sales promotion; web site traffic optimization; pay per click advertising; business management for freelance service providers; negotiation and conclusion of commercial transactions for third parties; updating and maintenance of data in computer databases; business project management services for construction projects; providing business information via a web site; provision of an on-line marketplace for buyers and sellers of goods and services; design of advertising materials; outsourced administrative management for companies; tax filing services; rental of billboards; career planning services; presentation of companies and their goods and services on the Internet for promotional purposes; presentation of companies on the Internet and other media for promotional purposes; providing employment information; providing employment information via a</p>
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			<p>global computer network in Class 035.</p> <p>For: Accident insurance underwriting services; issue of tokens of value; processing electronic payments made through prepaid cards; issue of tokens of value for payment of transportation expenses; electronic payment, namely, providing electronic processing and transmission of credit card transaction wireless wallets, mobile wallets, electronic wallets, debit and prepaid card transactions; charge card and stored value prepaid card services, namely, processing electronic payments; prepaid purchase card services namely, processing electronic payments made through prepaid cards; accident insurance underwriting; instalment loans; actuarial services; leasing of real estate; credit bureaus; real estate agency services; real estate brokerage; debt collection agency services; insurance brokerage; financial customs brokerage services; insurance underwriting for all types of insurance; banking; real estate appraisal; charitable fund raising; mutual funds investment, distribution and advisory services; capital investment; exchanging money; financial clearing-houses; safe deposit box services; loans financing; fiscal assessments; financial evaluation for insurance, banking, and real estate purposes; factoring agency services; trusteeship representatives; financing services; financial management; pawn brokerage; real estate management services; apartment house management; fire insurance underwriting; rental of</p>
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			apartments; leasing of farms; health insurance underwriting; marine insurance underwriting; mortgage banking; savings bank services; securities brokerage; life insurance underwriting; financial analysis; antique appraisal; art appraisal; check verification; financial consultancy; insurance consultancy; credit card transaction processing services; debit card transaction processing services; electronic funds transfer; financial information; insurance information; jewelry appraisal; numismatic appraisal; rent collection; stamp appraisal; issuance of tokens of value; deposits of valuables, namely, safety deposit box services; stock exchange quotations; issuance of credit cards; real estate services, namely, rental of offices; financial sponsorship of sports competitions and special events related thereto; online banking; business liquidation services, financial; repair costs evaluation; brokerage of carbon credits; financial evaluation of standing timber; financial evaluation of wool; stock brokerage services; debt advisory services; arranging finance for construction projects; providing financial information via a web site; financial management of reimbursement payments for others; investment of funds; stocks and bonds brokerage; agencies for trading of commodity futures; brokerage of futures; futures commission merchant services, namely, clearing trades for commodities, futures and foreign exchange; financial services, namely, gold trading; providing
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			<p>information on options markets via a web site; providing information relating to the trading of commodity futures; securities arbitrage services; appraisal of second-hand automobiles; automobile appraisal; consultancy relating to the appraisal of goods; providing information relating to the appraisal of second-hand automobiles in Class 036.</p> <p>For: Radio broadcasting; electronic message sending; television broadcasting; transmission of telegrams; telegraph services; communications by telegrams; telephone communication services; communications by telephone; communications through an international system of telegraphy with printed messages transmitted and received by teleprinters using the public telecommunications network; news agencies, namely, the transmission of news items to news reporting organizations; cable television broadcasting; communications by cellular phones; communications by computer terminals; computer aided transmission of messages and images; electronic transmission of e-mail; facsimile transmission; information about telecommunication; paging services for radio, telephone or other means of electronic communication; rental of message sending apparatus for communications purposes; rental of facsimile apparatus; rental of modems; rental of telecommunication equipment; rental of telephones; satellite transmission; electronic bulletin board services; providing telecommunications</p>
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			<p>connections to a global computer network; telecommunications routing and junction services; teleconferencing services; providing user access to global computer networks; rental of access time to global computer networks; providing telecommunication channels for teleshopping services; providing Internet chatrooms; providing access to databases; voice mail services; transmission of greeting cards online; transmission of digital files; wireless broadcasting; videoconferencing services; providing online forums for transmission of messages among computer users; streaming of data; radio communications in Class 038.</p> <p>For: Education services, namely, providing classes of instruction in the field of video games; organizing community sporting activities; providing online non-downloadable software for playing games, namely, providing on-line computer games; game cafe services, namely, providing facilities for playing computer games with installed video game machines in an Internet cafe environment; providing on-line journals, namely, blogs featuring user-defined content in the field of social-networking; providing information about computer games using communication by an electronic computer terminal; providing information about computer games via a cellular phone; providing information via the Internet about computer games using communication by hand-held games with liquid crystal displays; providing games using communication</p>
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		<p>by an electronic computer terminal, namely, providing on-line computer games; providing on-line computer games using communication by a cellular phone; providing on-line computer games using communication by hand-held games with liquid crystal displays; providing on-line non-downloadable consumer video games; providing non-downloadable music, sound and image data using Internet; computer game services provided on-line from a computer network; amusement park services; animal training; rental of movie projectors and accessories; movie studios services; circuses; Providing education in the field of computers, music, art rendered through correspondence courses; physical education; rental of show scenery; providing recreation facilities; radio entertainment production; publication of texts, other than publicity texts; rental of sound recordings; rental of cine-films; film production, other than advertising films; gymnastic instruction; lending libraries; publication of books; rental of radio and television sets; production of radio and television programmes; music-halls; orchestra services; entertainment in the nature of theatre productions; production of television shows; television entertainment, namely, ongoing television programs in the field of computer games, video games, animated films and animated cartoons; rental of stage scenery; zoological garden services; providing sports facilities; modelling for artists; mobile library</p>
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			services; providing casino facilities for gambling; entertainment and education club services, namely, after-hours night club services; arranging and conducting of educational conferences; arranging and conducting of educational congresses in the field of business; discotheque services; information about education; educational examination services; entertainment information; organization of exhibitions for cultural or educational purposes; gambling services; providing golf facilities; health club services, namely, providing health and fitness training; holiday camp services; presentation of live show performances; cinema theater presentations; nursery schools; organization of sports competitions; party planning; providing museum facilities presentation and exhibitions; recording studio services; recreation information; rental of skin diving equipment; rental of sports equipment, except vehicles; rental of stadium facilities; rental of video cassette recorders; rental of videotapes; sport camp services; timing of sports events; boarding school education; arranging of beauty contests; booking of seats for shows; dubbing; providing classes of instruction in the field of religious education; operating lotteries; organization of balls; organization of live music shows, namely, impresario services; providing amusement arcade services; rental of audio equipment; rental of lighting apparatus for theatrical sets or television studios; rental of tennis courts; rental of video cameras;
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		scriptwriting services for non-advertising purposes; videotape editing; publication of electronic books and journals on-line; electronic desktop publishing; subtitling; electronic game services provided on-line from a computer network; providing karaoke facility services; music composition services; night clubs; providing on-line non-downloadable electronic publications in the nature of books and journals in the field of business; publication of electronic books and journals in the field of business; photographic reporting; photography; vocational guidance; news reporters services; translation; sign language interpretation; videotaping; microfilming; ticket agency services for entertainment events; writing of texts, other than publicity texts, namely, writing of articles for professional journals other than for advertising or publicity; arranging and conducting of concerts; calligraphy services; layout services, other than for advertising purposes; organization of fashion shows for entertainment purposes; coaching in the field of sports; rental of sports grounds; disc jockey services; language interpreter services; personal trainer services fitness training; conducting fitness classes; production of music; toy rental; games equipment rental; providing on-line music, not downloadable; providing on-line videos, namely, providing a web site featuring non-downloadable instructional videos in the field of computer games, video games, animated films and animated
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		<p>cartoons; rental of cameras; rental of musical instruments; rental of paintings and calligraphic works; rental of film negatives; operation of audio equipment for production of radio programs; operation of video and audio equipment for production of television programs; providing information on-line relating to computer games and computer enhancements for games; providing on-line computer games; providing on-line information and news in the field of employment training; providing zip line rides for recreational purposes; amusement arcade services; amusement park and theme park services; entertainment in the nature of a water park and amusement center; entertainment in the nature of an amusement park ride; providing amusement facilities in Class 041.</p> <p>For: Design and development of computer hardware and software; Software as a service, namely, providing non-downloadable operating system software with regard to infrastructures on the Internet, intranet and extranet in the fields gaming and wagering; providing temporary use of non-downloadable software for the operation of gaming and wagering websites on the Internet; design, development and maintenance of computer software and online game websites for others; design, development and maintenance of computer software and online game sites; chemical analysis; analysis for oil-field exploitation; architectural services; bacteriological research; chemistry</p>
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			services, namely, research in the field of chemistry; chemical research; architectural consultation; construction drafting; oil-well testing; cosmetics research; design of interior decor; industrial design; packaging design; material testing; geological surveys; oil-field surveys; engineering; meteorological information; land surveying; computer rental; computer programming; oil prospecting; physics research; mechanical research; textile testing; geological prospecting; geological research; authenticating works of art; calibration; computer software design; updating of computer software; consultancy in the design and development of computer hardware; dress designing; graphic arts design; quality control for others; rental of computer software; research and development of new products for others; styling, namely, industrial design; underwater exploration; recovery of computer data; maintenance of computer software; computer system analysis; biological research; urban planning; surveying; computer system design services; vehicle roadworthiness testing; duplication of computer programs; conversion of data or documents from physical to electronic media; creating and maintaining web sites for others; hosting the computer sites on a computer server for a global computer network; installation of computer software; cloud seeding; data conversion of computer programs and data not physical conversion; computer software consultancy; rental of web servers;
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			computer virus protection services; consultancy in the field of energy-saving for scientific research purposes; research in the field of environmental protection; providing search engines for the Internet; digitization of documents; handwriting analysis, namely, graphology; provision of scientific information, advice and consultancy in relation to carbon offsetting; quality evaluation of standing timber; quality evaluation of wool; monitoring of computer systems by remote access for detecting unauthorized access or data breach; water analysis; scientific laboratory services; energy auditing; web site design consultancy; consulting services in the field of software as a service (SaaS); information technology consultancy; scientific research; server hosting; conducting clinical trials for others; off-site data backup; electronic data storage; providing information on computer technology and programming via a web site; cartography services; cloud computing consultancy; technological consultancy in the field of computer systems; telecommunications technology consultancy; weather forecasting; technical advice relating to operation of computers; rental of measuring apparatus; rental of laboratory apparatus and instruments; rental of technical drawing instruments; development of computer game software; development of computer hardware; development of computer software; development of computer software application solutions; development of computer systems in
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			<p>Class 042.</p> <p>For: Services for providing food and drink in restaurants; providing temporary accommodation; accommodation bureau, namely, providing services of hotels and boarding houses; food and drink catering; retirement home services; cafes; cafeterias; providing campground facilities; canteen services; rental of temporary accommodation; boarding house services; tourist home services; hotels; day-nurseries in the nature of creches; restaurants; boarding house bookings; making hotel reservations for others; self-service restaurants; snack-bars; boarding for animals; bar services; providing temporary lodging for holiday camp services; temporary accommodation reservations; motel services; rental of chairs, tables, table linen, glassware; rental of meeting rooms; rental of tents; rental of cooking apparatus; rental of drinking water dispensers; food sculpting; rental of futon and quilts for hotels; rental of towels for hotels in Class 043.</p> <p>For: Legal services; security services for the protection of property and individuals, namely, surveillance services; personal body guarding; detective agency services; dating services; night guard services; locksmithing, namely, opening of security locks; evening dress rental; crematorium services; missing person investigations; funeral arrangement services; funerary service undertaking;</p>
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			<p>clothing rental; guard services; marriage agencies, namely, conducting civil marriage ceremony services; physical security consultancy; horoscope casting; fire-fighting; organization of religious prayer meetings; adoption agency services; monitoring of burglar and security alarms; babysitting; baggage handling inspections for airlines; house sitting; pet sitting; personal background investigations; lost property return; mediation; inspection of factories for safety purposes; rental of fire alarms; rental of fire extinguishers; arbitration services; intellectual property consultancy; copyright management; licensing of intellectual property; monitoring intellectual property rights for legal advisory purposes; legal research; litigation services; licensing of computer software; registration of domain names; alternative dispute resolution services; rental of safes; genealogical research; planning and arranging of wedding ceremonies; on-line social networking services; releasing doves for special occasions; embalming services; legal document preparation services; tracking of stolen property; legal administration of licenses; consultancy services in the field of personal fashion; information about personal wardrobe styling services; information relating to fashion coordination services for individuals; personal styling services consisting of bra measuring and fitting services; personal styling services consisting of measuring and fitting services for ladies' lingerie; personal wardrobe styling</p>
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			services; providing grave spaces or charnel houses; legal services relating to social insurance claims; rental of altars; rental of jewelry; licensing of computer software via networks in Class 045.
2,315,166	SEGA	Feb. 8, 2000	For: Video game machines for use with televisions; electronic gaming machines; video game software; computer game software in Class 009.
3,245,697	SEGA	May 29, 2007	For: T-shirts; shirts in Class 025.

14. The U.S. registrations for the Sega Trademarks are valid, subsisting, and in full force and effect, and some are incontestable pursuant to 15 U.S.C. § 1065. The registrations for the Sega Trademarks constitute *prima facie* evidence of their validity and of Sega's exclusive right to use the Sega Trademarks pursuant to 15 U.S.C. § 1057(b). True and correct copies of the United States Registration Certificates for the Sega Trademarks are attached hereto as **Exhibit 1**.

15. The Sega Trademarks are exclusive to Sega and are displayed extensively on Sega Products and in marketing and promotional materials. The Sega Trademarks are also distinctive when applied to Sega Products, signifying to the purchaser that the products come from Sega and are manufactured to Sega's quality standards. Whether Sega manufactures the products itself or contracts with others to do so, Sega has ensured that its products bearing the Sega Trademarks are manufactured to the highest quality standards.

16. The Sega Trademarks are famous marks, as that term is used in 15 U.S.C. § 1125(c)(1) and have been continuously used and never abandoned. The innovative marketing and product designs of Sega Products have enabled the Sega, Colorful Stage, and Like a Dragon brands to achieve widespread recognition and fame and have been integral to making the Sega Trademarks some of the most well-known marks in the video game and entertainment industries. The

widespread fame, outstanding reputation, and significant goodwill associated with the Sega, Colorful Stage, and Like a Dragon brands have made the Sega Trademarks valuable assets of Sega.

17. The Sega Trademarks have been the subject of substantial and continuous marketing and promotion by Sega. Sega has and continues to market and promote the Sega Trademarks in the industry and to consumers through traditional print media, authorized retailers, its official websites, social media sites, and point of sale material.

18. Sega has expended substantial time, money, and other resources in advertising and promoting the Sega Trademarks. Specifically, Sega has expended substantial resources in advertising, promoting, and marketing featuring the Sega Trademarks. Sega Products have also been the subject of extensive unsolicited publicity resulting from their high-quality, innovative designs. As a result, products bearing the Sega Trademarks are widely recognized and exclusively associated by consumers as being high-quality products sourced from Sega. Sega Products have become among the most popular of their kind in the world. The Sega Trademarks have achieved tremendous fame and recognition, adding to the inherent distinctiveness of the marks. As such, the goodwill associated with the Sega Trademarks is of immeasurable value to Sega.

19. Sega Products are sold only through authorized retail channels and are recognized by the public as being exclusively associated with the Sega, Colorful Stage!, and Like a Dragon brands.

20. Defendants are unknown individuals and business entities who own and/or operate one or more of the e-commerce stores under the Seller Aliases identified on Schedule A and/or other seller aliases not yet known to Sega. On information and belief, Defendants reside and/or operate in foreign jurisdictions and redistribute products from the same or similar sources in those

locations. Defendants have the capacity to be sued pursuant to Federal Rules of Civil Procedure 17(b).

21. On information and belief, Defendants, either individually or jointly, operate one or more e-commerce stores under the Seller Aliases listed in Schedule A attached hereto. Tactics used by Defendants to conceal their identities and the full scope of their operation make it virtually impossible for Sega to learn Defendants' true identities and the exact interworking of their network. If Defendants provide additional credible information regarding their identities, Sega will take appropriate steps to amend the Complaint.

IV. DEFENDANTS' UNLAWFUL CONDUCT

22. The success of the Sega, Colorful Stage!, and Like a Dragon brands has resulted in significant counterfeiting of the Sega Trademarks. Because of this, Sega has implemented a brand protection program by investigating suspicious websites and online marketplace listings identified in proactive Internet sweeps. Recently, Sega has identified many fully interactive e-commerce stores offering Unauthorized Products on online marketplace platforms like AliExpress.com (“AliExpress”), Amazon.com, Inc. (“Amazon”), DHGate.com (“DHGate”), eBay, Inc. (“eBay”), WhaleCo, Inc. (“Temu”), and Walmart, Inc. (“Walmart”), including the e-commerce stores operating under the Seller Aliases. The Seller Aliases target consumers in this Judicial District and throughout the United States. According to a report prepared for The Buy Safe America Coalition, most counterfeit products now come through international mail and express courier services because of increased sales from foreign online counterfeiters. *The Counterfeit Silk Road: Impact of Counterfeit Consumer Products Smuggled Into the United States*, prepared by John Dunham & Associates (**Exhibit 2**).

23. Because the counterfeit products sold by offshore online counterfeiters do not enter normal retail distribution channels, the US economy lost an estimated 300,000 or more full-time jobs in the wholesale and retail sectors alone in 2020. *Id.* When accounting for lost jobs from suppliers that would serve these retail and wholesale establishments, and the lost jobs that would have been induced by employees re-spending their wages in the economy, the total economic impact resulting from the sale of counterfeit products was estimated to cost the United States economy over 650,000 full-time jobs that would have paid over \$33.6 billion in wages and benefits. *Id.* Additionally, it is estimated that the importation of counterfeit goods cost the United States government nearly \$7.2 billion in personal and business tax revenues in the same period. *Id.*

24. Furthermore, online marketplace platforms like those used by Defendants do not adequately subject new sellers to verification and confirmation of their identities, allowing infringers to “routinely use false or inaccurate names and addresses when registering with these e-commerce platforms.” **Exhibit 3**, Daniel C.K. Chow, *Alibaba, Amazon, and Counterfeiting in the Age of the Internet*, 40 NW. J. INT’L L. & BUS. 157, 186 (2020); *see also* report on “Combating Trafficking in Counterfeit and Pirated Goods” prepared by the U.S. Department of Homeland Security’s Office of Strategy, Policy, and Plans (Jan. 24, 2020), attached as **Exhibit 4**, and finding that on “at least some e-commerce platforms, little identifying information is necessary for a counterfeiter to begin selling” and that “[t]he ability to rapidly proliferate third-party online marketplaces greatly complicates enforcement efforts, especially for intellectual property rights holders.” Infringers hedge against the risk of being caught and having their websites taken down from an e-commerce platform by establishing multiple virtual storefronts. **Exhibit 4** at p. 22. Since platforms generally do not require a seller on a third-party marketplace to identify the underlying

business entity, infringers can have many different profiles that can appear unrelated even though they are commonly owned and operated. Exhibit 4 at p. 39. Further, “[e]-commerce platforms create bureaucratic or technical hurdles in helping brand owners to locate or identify sources of counterfeits and counterfeiters.” Exhibit 3 at 186-187. Specifically, brand owners are forced to “suffer through a long and convoluted notice and takedown procedure only for the counterfeiter to reappear under a new false name and address in short order.” *Id.* at p. 161.

25. Defendants have targeted sales to Florida residents by setting up and operating e-commerce stores that target United States consumers using one or more Seller Aliases; offer shipping to the United States, including Florida; accept payment in U.S. dollars; and, on information and belief, sell Unauthorized Products to residents of Florida.

26. Defendants concurrently employ and benefit from similar advertising and marketing strategies. For example, Defendants facilitate sales by designing the e-commerce stores operating under the Seller Aliases so that they appear to unknowing consumers to be authorized online retailers, outlet stores, or wholesalers. E-commerce stores operating under the Seller Aliases appear sophisticated and accept payment in U.S. dollars via numerous methods, including credit cards, Amazon Pay, PayPal, and/or Stripe. E-commerce stores operating under the Seller Aliases often include content and images that make it very difficult for consumers to distinguish such stores from an authorized retailer. Sega has not licensed or authorized Defendants to use any of the Sega Trademarks, and none of the Defendants are authorized retailers of Sega Products.

27. Many Defendants also deceive unknowing consumers by using the Sega Trademarks without authorization within the content, text, and/or meta tags of their e-commerce stores to attract consumers using search engines to find websites relevant to Sega Products. Other e-commerce stores operating under the Seller Aliases omit using the Sega Trademarks in the item

title to evade enforcement efforts while using strategic item titles and descriptions that will trigger their listings when consumers are searching for Sega Products.

28. E-commerce store operators like Defendants commonly engage in fraudulent conduct when registering the Seller Aliases by providing false, misleading and/or incomplete information to e-commerce platforms to prevent discovery of their true identities and the scope of their e-commerce operation.

29. E-commerce store operators like Defendants regularly register or acquire new seller aliases for the purpose of offering for sale and selling Unauthorized Products. Such seller alias registration patterns are one of many common tactics used by e-commerce store operators like Defendants to conceal their identities and the full scope and interworking of their operation, and to avoid being shut down.

30. Even though Defendants operate under multiple fictitious aliases, the e-commerce stores operating under the Seller Aliases often share identifiers, such as templates with common design elements that intentionally omit any contact information or other information for identifying Defendants or other Seller Aliases they operate or use. E-commerce stores operating under the Seller Aliases include other notable common features such as use of the same registration patterns, accepted payment methods, check-out methods, keywords, advertising tactics, similarities in price and quantities, the same incorrect grammar and misspellings, and/or the use of the same text and images. Additionally, Unauthorized Products for sale by the Seller Aliases bear similar irregularities and indicia of being unauthorized to one another, suggesting that the Unauthorized Products were manufactured by and come from a common source and that Defendants are interrelated.

31. E-commerce store operators like Defendants communicate with each other through QQ.com chat rooms and utilize websites, like sellerdefense.cn, that provide tactics for operating multiple online marketplace accounts and evading detection by brand owners. Websites like sellerdefense.cn also tip off e-commerce store operators like Defendants of new intellectual property infringement lawsuits filed by brand owners, such as Sega, and recommend that e-commerce operators cease their infringing activity, liquidate their associated financial accounts, and change the payment processors that they currently use to accept payments in their online stores.

32. Counterfeitors, such as Defendants, typically operate under multiple seller aliases and payment accounts so that they can continue operation despite Sega's enforcement. E-commerce store operators like Defendants maintain offshore bank accounts and regularly move funds from their financial accounts to offshore accounts outside the jurisdiction of this Court to avoid payment of any monetary judgment awarded to Sega.

33. Defendants are working to knowingly and willfully manufacture, import, distribute, offer for sale, and/or sell Unauthorized Products in the same transaction, occurrence, or series of transactions or occurrences. Defendants, without any authorization or license from Sega, have knowingly and willfully used, and continue to use, the Sega Trademarks in connection with the advertisement, distribution, offering for sale, and/or sale of Unauthorized Products into the United States and Florida over the Internet.

34. Defendants' unauthorized use of the Sega Trademarks in connection with the advertising, distribution, offering for sale, and/or sale of Unauthorized Products into the United States, including Florida, is likely to cause, and has caused, confusion, mistake, and deception by and among consumers and is irreparably harming Sega.

COUNT I
TRADEMARK INFRINGEMENT AND COUNTERFEITING (15 U.S.C. § 1114)

35. Sega hereby re-alleges and incorporates by reference the allegations set forth in the preceding paragraphs.

36. This is a trademark infringement action against certain Defendants based on their unauthorized use in commerce of counterfeit imitations of the Sega Trademarks in connection with the sale, offering for sale, distribution, and/or advertising of counterfeit goods. The Sega Trademarks are highly distinctive marks. Consumers have come to expect the highest quality from Sega Products offered, sold, or marketed under the Sega Trademarks.

37. Certain Defendants have sold, offered to sell, marketed, distributed, and advertised, and are still selling, offering to sell, marketing, distributing, and/or advertising products using counterfeit reproductions of the Sega Trademarks without Sega's permission.

38. Sega owns the Sega Trademarks. Sega's United States registrations for the Sega Trademarks are in full force and effect. Upon information and belief, certain Defendants have knowledge of Sega's rights in the Sega Trademarks and are willfully infringing and intentionally using infringing and counterfeit versions of the Sega Trademarks. Those Defendants' willful, intentional, and unauthorized use of the Sega Trademarks is likely to cause, and is causing, confusion, mistake, and deception as to the origin and quality of the Unauthorized Products among the general public.

39. Certain Defendants' activities constitute willful trademark infringement and counterfeiting under Section 32 of the Lanham Act, 15 U.S.C. § 1114.

40. Sega has no adequate remedy at law, and if certain Defendants' actions are not enjoined, Sega will continue to suffer irreparable harm to its reputation and the goodwill of the Sega Trademarks.

41. The injuries and damages sustained by Sega have been directly and proximately caused by certain Defendants' wrongful reproduction, use of advertisement, promotion, offering to sell, and/or sale of Unauthorized Products.

COUNT II
FALSE DESIGNATION OF ORIGIN (15 U.S.C. § 1125(a))

42. Sega hereby re-alleges and incorporates by reference the allegations set forth in the preceding paragraphs.

43. Defendants' promotion, marketing, offering for sale, and/or sale of Unauthorized Products has created and is creating a likelihood of confusion, mistake, and deception among the general public as to the affiliation, connection, or association with Sega or the origin, sponsorship, or approval of the Unauthorized Products by Sega.

44. By using the Sega Trademarks in connection with the offering for sale and/or sale of Unauthorized Products, Defendants create a false designation of origin and a misleading representation of fact as to the origin and sponsorship of the Unauthorized Products.

45. Defendants' false designation of origin and misrepresentation of fact as to the origin and/or sponsorship of the Unauthorized Products to the general public involves the use of counterfeit marks and is a willful violation of Section 43 of the Lanham Act, 15 U.S.C. § 1125.

46. Sega has no remedy at law and will continue to suffer irreparable harm to its reputation and the associated goodwill of the Sega brands if certain Defendants' actions are not enjoined.

PRAYER FOR RELIEF

WHEREFORE, Sega prays for judgment against Defendants as follows:

- 1) That Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under, or in active concert with

them be temporarily, preliminarily, and permanently enjoined and restrained from – pursuant to 15 U.S.C. § 1116, 28 U.S.C. § 1651(a), The All Writs Act, and Federal Rule of Civil Procedure 65:

- a. using the Sega Trademarks or any reproductions, counterfeit copies or colorable imitations thereof in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a Sega Product or is not authorized by Sega to be sold in connection with the Sega Trademarks;
- b. passing off, inducing, or enabling others to sell or pass off any products as Sega Products or any other product produced by Sega, that is not Sega's or not produced under the authorization, control, or supervision of Sega and approved by Sega for sale under the Sega Trademarks;
- c. committing any acts calculated to cause consumers to believe that Defendants' Unauthorized Products are those sold under the authorization, control, or supervision of Sega, or are sponsored by, approved by, or otherwise connected with Sega;
- d. further infringing the Sega Trademarks and damaging Sega's goodwill; and
- e. manufacturing, shipping, delivering, holding for sale, transferring, or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for Sega, nor authorized by Sega to be sold or offered for sale, and which bear any of the Sega Trademarks, or any reproductions, counterfeit copies or colorable imitations thereof;

2) Entry of an Order pursuant to The All Writs Act, 28 U.S.C. § 1651(a), and the Court's inherent authority that, upon Sega's request, those with notice of the injunction, including

without limitation, any websites and/or online marketplace platforms like AliExpress, Amazon, DHGate, eBay, Temu, and Walmart shall disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of counterfeit and infringing goods using the Sega Trademarks;

- 3) That certain Defendants account for and pay to Sega all profits realized by those Defendants by reason of those Defendants' unlawful acts herein alleged, and that the amount of damages for infringement of the Sega Trademarks be increased by a sum not exceeding three times the amount thereof as provided by 15 U.S.C. § 1117;
- 4) In the alternative, that Sega be awarded statutory damages for willful trademark counterfeiting pursuant to 15 U.S.C. § 1117(c)(2) of \$2,000,000 for each and every use of the Sega Trademarks;
- 5) Sega is further entitled to recover its attorneys' fees and full costs for bringing this action pursuant to 15 U.S.C. § 1117(a); and
- 6) Award any and all other relief that this Court deems just and proper.

Dated this 14th day of July 2025.

Respectfully submitted,

/s/George C. Sciarrino

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Schedule A

This page is the subject of Sega's concurrently filed Motion to File Certain Documents Under Seal. As such, this page has been redacted in accordance with L.R. 5.4(b)(1).