

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Canvasfish.com, LLC,
a Montana Limited Liability Company,

Plaintiff,

Case No.: 22-cv-05058

v.

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

Defendants.

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff Canvasfish.com, LLC, by and through its attorneys Revision Legal, PLLC, states as follows for its Complaint and Demand for Jury Trial:

PARTIES, JURISDICTION AND VENUE

1. Plaintiff Canvasfish.com, LLC (“Canvasfish”) is a Montana Limited Liability Company.

2. Upon information and belief, the Partnerships and Unincorporated Associations Identified on Schedule A (“Defendants”) are individuals and business entities that own and/or operate one or more ecommerce stores under the seller aliases in Schedule A, based out of China, Vietnam or other foreign jurisdictions.

3. This Court has original subject matter jurisdiction over the claims in this action pursuant to the provisions of the Lanham Act, 15 U.S.C. § 1051, *et seq.*, the Copyright Act 17 U.S.C. § 501, *et seq.*, 28 U.S.C. § 1338(a)-(b) and 28 U.S.C. § 1331.

4. Personal jurisdiction is proper over Defendants because exercise thereof would not offend traditional notions of fair play or substantial justice because Defendants have purposefully

availed themselves of this forum state, the cause of action arises from Defendants' activities here, and the Defendants' actions have caused damage to Canvasfish in the State of Illinois.

5. Specifically, Defendants purposefully and intentionally availed themselves of this forum state by manufacturing, importing, distributing, offering for sale, displaying, advertising, and selling counterfeit goods bearing Canvasfish's creative works; by manufacturing, importing, distributing, offering for sale, displaying, advertising, and selling counterfeit goods bearing Canvasfish's trademark; by creating and operating interactive websites that reveal specifically intended interactions with residents of the State of Illinois.

6. Venue is proper in this Court pursuant to 28 U.S.C. § 1391, and this Court may properly exercise personal jurisdiction over Defendants since each of the Defendants directly targets business activities toward consumers in the United States, including Illinois, through at least the fully interactive, e-commerce stores operating under several aliases. Specifically, Defendants have targeted sales to Illinois residents by setting up and operating e-commerce stores that target United States consumers using one or more aliases identified in Schedule A attached hereto ("Seller Aliases"). They offer shipping to the United States, including Illinois, accept payment in U.S. dollars and, on information and belief, have sold products using infringing and counterfeit versions of Canvasfish's federally registered trademarks, copyrighted designs, or both to residents of Illinois. Each of the Defendants is committing tortious acts in Illinois, is engaging in interstate commerce, and has wrongfully caused Canvasfish substantial injury in the State of Illinois.

STATEMENT OF FACTS

Introduction

7. Canvasfish owns the intellectual property rights of Derek DeYoung (“DeYoung”), a successful and well-known artist who has cultivated a unique artform primarily related to fly fishing. Because of DeYoung’s success as an artist, multitudes of e-commerce stores seek to cash in on Canvasfish’s artistic reputation and goodwill by listing and selling unauthorized products that use counterfeit versions of Canvasfish’s federally registered trademark and identical copies of Canvasfish’s federally registered copyright protected works (the “Counterfeit Products”). Defendants create e-commerce stores, sometimes using one or more Seller Aliases, to advertise, offer for sale, and sell these Counterfeit Products to customers who believe they are purchasing official products that support Canvasfish. Therefore, Canvasfish files the instant action in an effort to combat Defendants’ blatant counterfeiting of its federally registered trademark and infringement of its copyrighted works, as well as to protect Canvasfish’s goodwill and unknowing customers on the internet. Canvasfish has been (and continues to be) irreparably damaged by the Defendants’ continued infringement of its registered trademark and copyrights, and therefore seeks both injunctive and monetary relief through this action.

Plaintiff’s Business

8. Canvasfish owns the intellectual property rights of DeYoung, who is a well-known artist and a graduate of the Kendall College of Art and Design.

9. DeYoung offers his artistic works for sale online via the <derekdeyoung.com> website.

10. DeYoung’s artistic works primarily focus on fish and fishing, and, in particular, the sport of fly fishing. DeYoung’s unique style presents a deviation from traditional fly-fishing art,

which typically uses a palate of natural colors, because his work emphasizes the rich and vibrant colors of the fish to produce a compelling result that is unlike any other artist in the field.

11. Due to the uniqueness of his work, DeYoung has contributed his art to products produced by some of the world’s largest manufacturers and retailers of sporting equipment and accessories, including collaborations with Burton Snowboards, Abel Reels, Simms, Costa, OtterBox, Buff, and Wingo Outdoors.

Plaintiff’s Registered Trademark

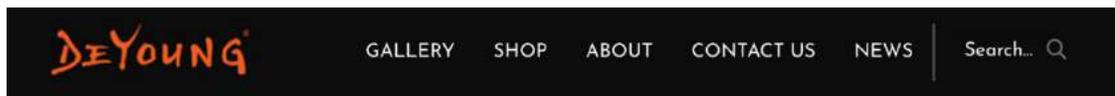
12. Canvasfish has taken significant steps to protect and register its trademark rights with the United States Patent and Trademark Office (“USPTO”) as follows:

Registration Number	Trademark	Registration Date	Goods/Services
6,157,362	DEYOUNG	September 22, 2020	IC 016: Original works of art namely, paintings IC 035: Online retail store featuring artwork, apparel, stickers, phone cases, drinkware, blankets, playing cards, boat wraps, coasters, coolers.

13. Canvasfish has used the above mark (the “DeYoung Mark”) continuously and exclusively on online retail store services since at least as early as October 2006 as well as on original works of art since at least as early as November 2006.

14. Examples of how Plaintiff uses the DeYoung Mark are depicted below:

Plaintiff's Website Header:



Original Work of Art:



15. Canvasfish has expended significant efforts and sums in developing the DeYoung brand, business, and advertising under the DeYoung Mark.

16. As a result of Canvasfish's consistent, continuous, and exclusive use of the DeYoung Mark in commerce, the mark has become well known across the globe and throughout the United States.

Plaintiff's Registered Copyrights

17. Canvasfish owns several United States Copyright Registrations for its unique works of art that it makes available for sale on its website ("DeYoung Works"):

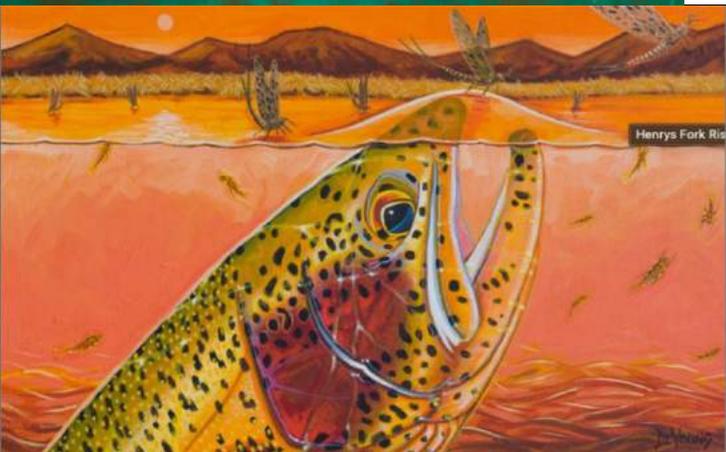
Title	Registration No.	Work
4 in 1 - Face	VA 1-910-379	
4 in 1 – Northern Rockies	VA 1-992-855	
4 in 1 Full - Brown	VA 1-934-603	
4 Panel – Brown October	VA 2-076-270	

<p>Abstract Bass Flank</p>	<p>VA 1-970-688</p>	
<p>Abstract Brookie Flank</p>	<p>VA 1-934-679</p>	
<p>Abstract Brookie Flank 2</p>	<p>VA 1-934-674</p>	

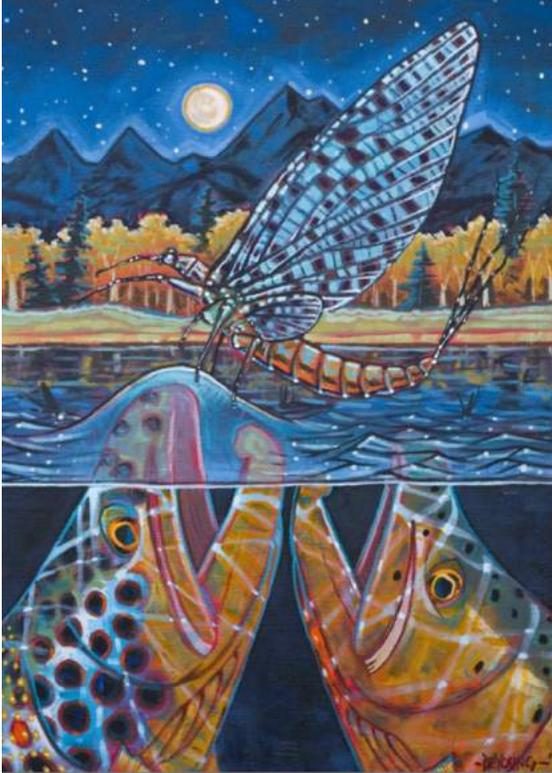
<p>Abstract Brown Flank - Blue</p>	<p>VA 1-970-688</p>	
<p>Abstract Brown Rusty Spinner</p>	<p>VA 1-934-676</p>	
<p>Abstract Cutthroat Yellowstone</p>	<p>VA 1-934-591</p>	

<p>Abstract Rainbow Royal Wulff</p>	<p>VA 1-970-688</p>	 An abstract painting of a fish's head, likely a rainbow trout, characterized by bold, expressive brushstrokes. The color palette is highly saturated, featuring bright reds, yellows, blues, and greens. The fish's eye is a prominent feature, rendered in a stylized, almost geometric manner with concentric circles of blue and orange. The overall composition is dynamic and textured.
<p>Abstract Tarpon Face - Blue</p>	<p>VA 1-970-693</p>	 An abstract painting focusing on the face of a tarpon. The color scheme is dominated by various shades of blue, from deep cerulean to bright cyan, interspersed with white and light purple. The texture is highly detailed, with visible brushwork that creates a sense of scale and depth, particularly in the depiction of the fish's scales and facial features. The eye is a focal point, rendered with a mix of blue and green tones.
<p>Abstract Tarpon Flank – Keys (Sunlight)</p>	<p>VA 1-970-693</p>	 An abstract painting depicting the flank of a tarpon, characterized by a dense, overlapping pattern of scales. The color palette is primarily composed of various shades of blue and teal, with subtle variations in tone that create a sense of depth and movement. The brushwork is very fine and detailed, capturing the intricate texture of the fish's scales. The overall effect is one of rhythmic repetition and naturalistic detail.
<p>Brown Callibaetis</p>	<p>VA 2-076-693</p>	 A realistic painting of a brown callibaetis fish, shown in profile with its mouth open as if about to catch a fly. The fish has a golden-brown body with prominent, dark spots and a lighter, almost white, underbelly. The background is a lush, green stream with visible water ripples and some foliage. The lighting is bright, suggesting a sunny day, and the overall style is more detailed and naturalistic than the abstract pieces.

<p>Contemporary Brook Trout Illustration</p>	<p>VA 1-934-744</p>	 A detailed illustration of a brook trout with a greyish-brown body and white spots, set against a background of green and yellow circular patterns.
<p>Cubist Brown</p>	<p>VA 2-101-364</p>	 A cubist-style painting of a brook trout with a vibrant red background, featuring bold black lines and a mix of colors like blue, yellow, and purple.
<p>Emigrant Risers</p>	<p>VA 2-218-646</p>	 A landscape painting of a brook trout in a river, with mountains and a sunset sky in the background.
<p>Fab Four - Alaska</p>	<p>VA 1-934-684</p>	 A painting of a brook trout with a vibrant, multi-colored body (red, yellow, blue, and purple) and a pinkish-red dorsal fin, set against a dark red background.

<p>Fab Four - Trout</p>	<p>VA 1-934-681</p>	 A painting of four trout, each with a different color pattern (yellow, blue, red, and brown), arranged in a row. They are set against a reddish-brown background.
<p>Grumpy Barracuda</p>	<p>VA 2-076-246</p>	 A painting of a barracuda with its mouth wide open, showing sharp teeth. The background is a vibrant green.
<p>Henry's Fork Riser</p>	<p>VA 1-934-685</p>	 A painting of a trout in a river. The trout is yellow with black spots and is shown in profile, facing right. The background shows a landscape with mountains and a river. A small text label "Henry's Fork Riser" is visible in the upper right corner of the painting.
<p>Montana Fly Patch</p>	<p>VA 1-917-463</p>	 A painting of various fly fishing gear, including flies, lures, and fishing tools, arranged on a red background.

<p>Permitopia</p>	<p>VA 2-076-204</p>	
<p>Pumpkinseed on Blue</p>	<p>VA 1-934-627</p>	

<p>Teton Risers - Night</p>	<p>VA 1-934-627</p>	 A painting titled "Teton Risers - Night" depicting a dragonfly with large, patterned wings perched on the back of a trout. The scene is set in a lake at night, with mountains and a full moon in the background. The water is dark blue, and the sky is a deep blue with stars and a bright moon. The trout is rendered in vibrant colors, including blue, yellow, and red, with intricate patterns on its body.	
<p>Trout Confetti 4</p>	<p>VA 1-934-647</p>	 A painting titled "Trout Confetti 4" showing a close-up of a trout. The fish is rendered in a highly stylized and colorful manner, with a body covered in intricate patterns of dots, lines, and swirls in shades of blue, yellow, red, and pink. The fish's head is prominent, with large, expressive eyes and a pinkish-red mouth. The background is dark, making the vibrant colors of the fish stand out.	

<p>Trout Confetti 6</p>	<p>VA 1-934-677</p>		
<p>Abstract Cutthroat – High Mountain</p>	<p>VA 2-165-453</p>		
<p>All Seasons Brown</p>	<p>VA 2-040-960</p>		

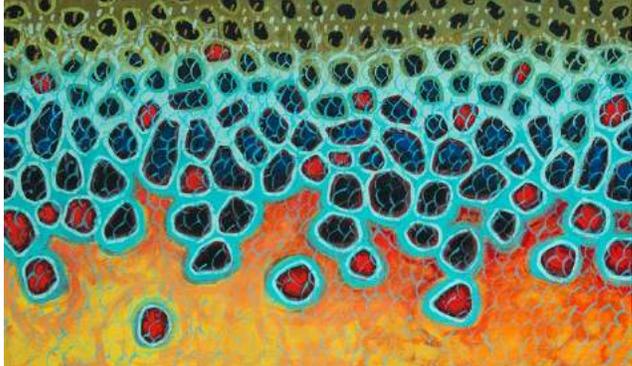
<p>Trout Mayflies</p>	<p>VA 2-273-035</p>	
<p>Contemporary Brown Trout Illustration</p>	<p>VA 1-934-746</p>	
<p>Abstract Brown Flank – Orange</p>	<p>VA 2-101-373</p>	
<p>Ripples</p>	<p>VA 2-273-038</p>	

Exhibit 1 – Copyright Registrations.

Defendants’ Infringing Businesses

18. The success of the DeYoung Mark as used in commerce for online sales as well as its use on the DeYoung Works has resulted in rampant counterfeiting and infringement. Canvasfish has put forth a concerted effort to combat the counterfeiting and infringement activities complained of herein. Canvasfish has identified numerous e-commerce stores, including those operating under the Seller Aliases, which were and are offering for sale and/or selling Counterfeit Products to consumers in this Judicial District and throughout the United States.

19. Defendants are online retailers of clothing goods, including t-shirts, sweatshirts, masks, coffee mugs, wall art, and other apparel and homewares. They have targeted online sales to Illinois residents by setting up and operating e-commerce stores, sometimes using the Seller Aliases, offering shipping to the United States, including Illinois, and accepting payment in U.S. dollars. Upon information and belief, Defendants have routinely, continuously and systematically sold Counterfeit Products to residents of Illinois.

20. Upon information and belief, Defendants are residents of China, Vietnam, or other foreign jurisdictions who operate under a scheme of common ownership and control to create numerous online retail stores under false names and payment accounts to sell clothing products and offer online retail services under a false indication of origin.

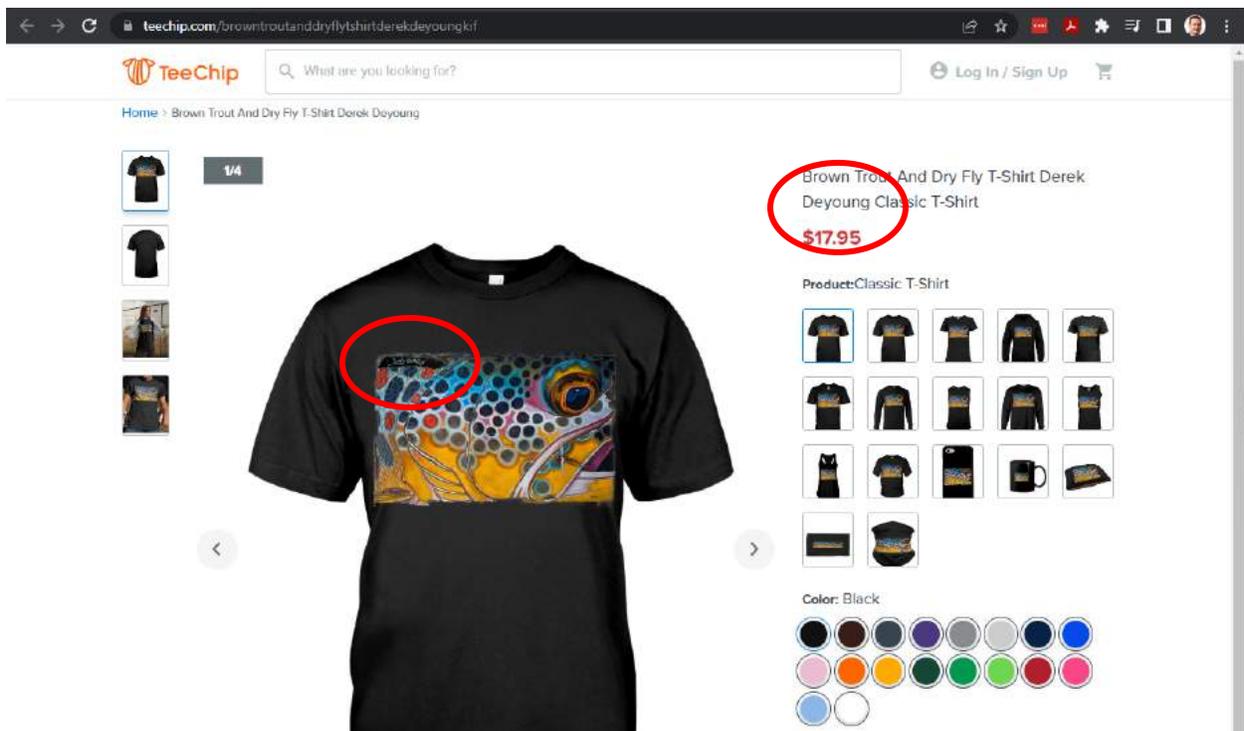
21. Upon information and belief, Defendants also own and operate websites, run online advertisements, and own and operate seller accounts on popular marketplaces such as eBay, AliExpress, Wish, and Amazon.

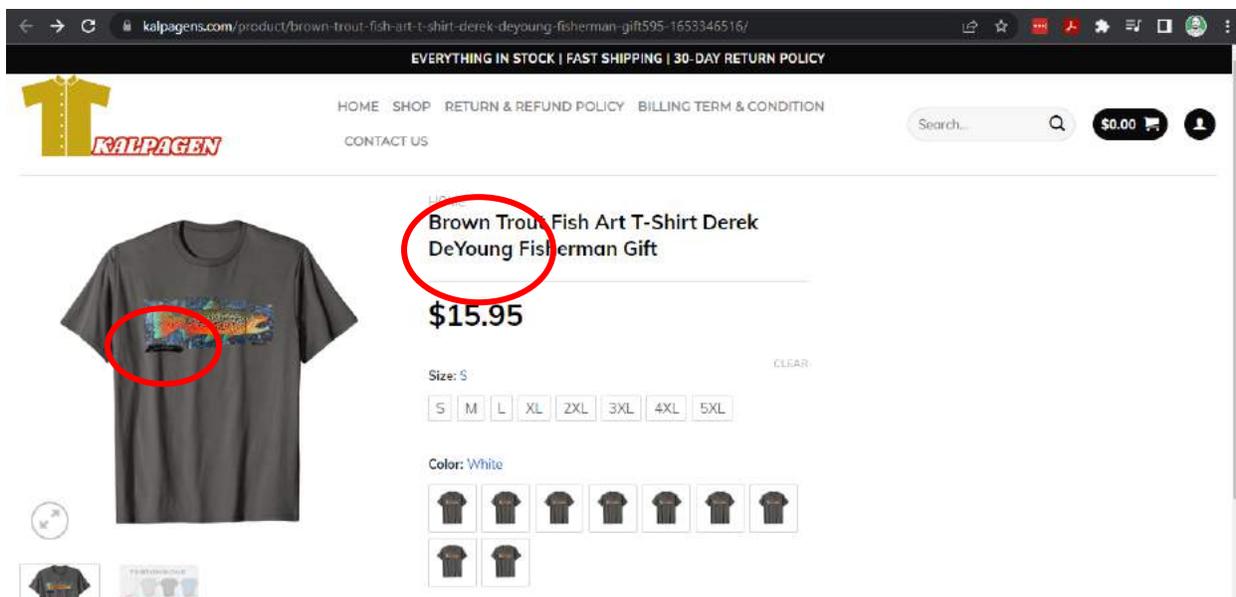
22. Upon information and belief, Defendants spend significant time, effort, and funds to run targeted advertisements geared toward United States consumers, including Illinois residents, through the use of Google Ads.

Defendants' Willful Trademark Infringement

23. Plaintiff's investigation of Defendants' online stores revealed that, on the tails of Plaintiff's success, Defendants have co-opted the DeYoung Mark. Defendants use the DeYoung Mark directly on their website, in product listing descriptions, on product images in marketing, and as keywords in advertising and indexing.

24. Examples of Defendants' use of the DeYoung Mark appear below:



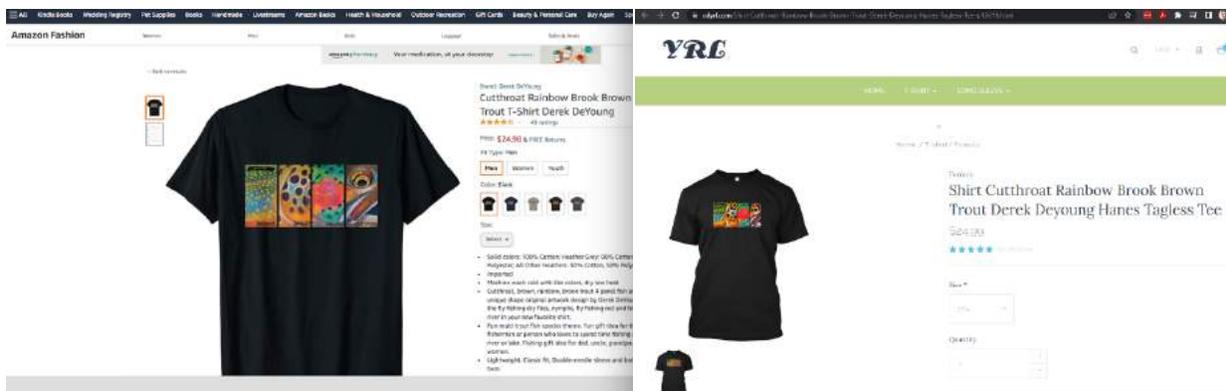


25. Defendants use the DeYoung Mark to promote and sell counterfeit goods to customers online.

26. Defendants also deceive unknowing consumers by using the DeYoung Mark without authorization within the content, text, and/or meta tags of their e-commerce stores to attract various search engines crawling the Internet looking for websites relevant to consumer searches for authorized products bearing the DeYoung Mark. Other e-commerce stores operating under the Seller Aliases omit using the DeYoung Mark 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 authorized DeYoung products.

27. Defendants have often posted wholesale copies of Plaintiff's website product listings on their own retail websites.

28. Defendants often publish an exact copy of Plaintiff's entire listings, including Plaintiff's product descriptions and product images. Below is an example of an authorized Amazon listing on the left, and an unauthorized listing on the right:



29. Defendants' use of the exact or substantially similar marks to the DeYoung Mark on the same goods and services sold in the same stream of commerce to every-day consumers is highly likely to cause confusion as to the origin of the goods and services among consumers.

30. After further investigation, Canvasfish found commonalities between the sellers.

31. The sellers used the same or similar website/storefront templates, most had direct copies or edited copies of authorized Amazon brand page's website product photos containing the DeYoung Mark.

32. Defendants concurrently employ and benefit from substantially similar advertising and marketing strategies. For example, some 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 look sophisticated and accept payment in U.S. dollars via credit cards, 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 the genuine stores selling authorized DeYoung products. Canvasfish has not licensed or authorized Defendants to use the DeYoung Mark, and none of the Defendants are authorized retailers of genuine DeYoung Products.

Defendant's Willful Copyright Infringement

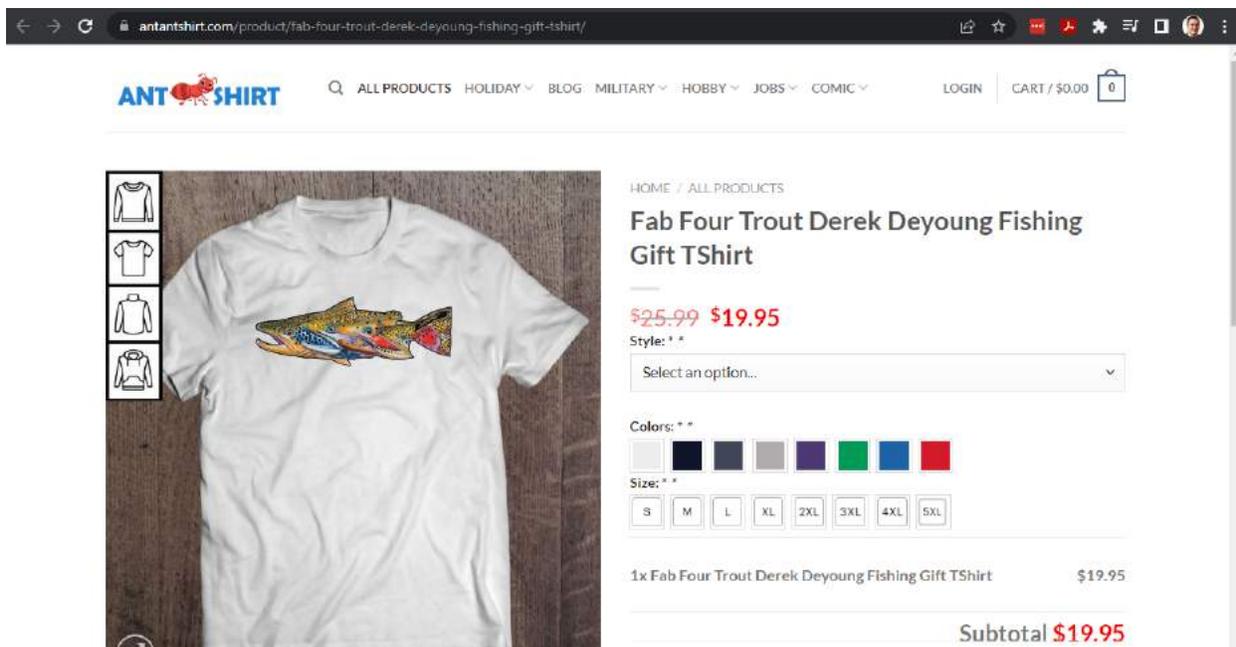
33. In addition to trading on Plaintiff's DeYoung Mark, Defendants also sell shirts, phone cases, masks, pillows, rugs, wall art, coffee mugs, and other accessories bearing exact copies of the DeYoung Works.

34. Defendants had access to the DeYoung Works via Plaintiff's online store which is published and available to anyone with internet access.

35. Upon information and belief, Defendants accessed Plaintiff's works directly from both its website as well as its authorized Amazon brand page and copied entire product listings, including the descriptions of the products, links within the descriptions, and the images containing the works themselves.

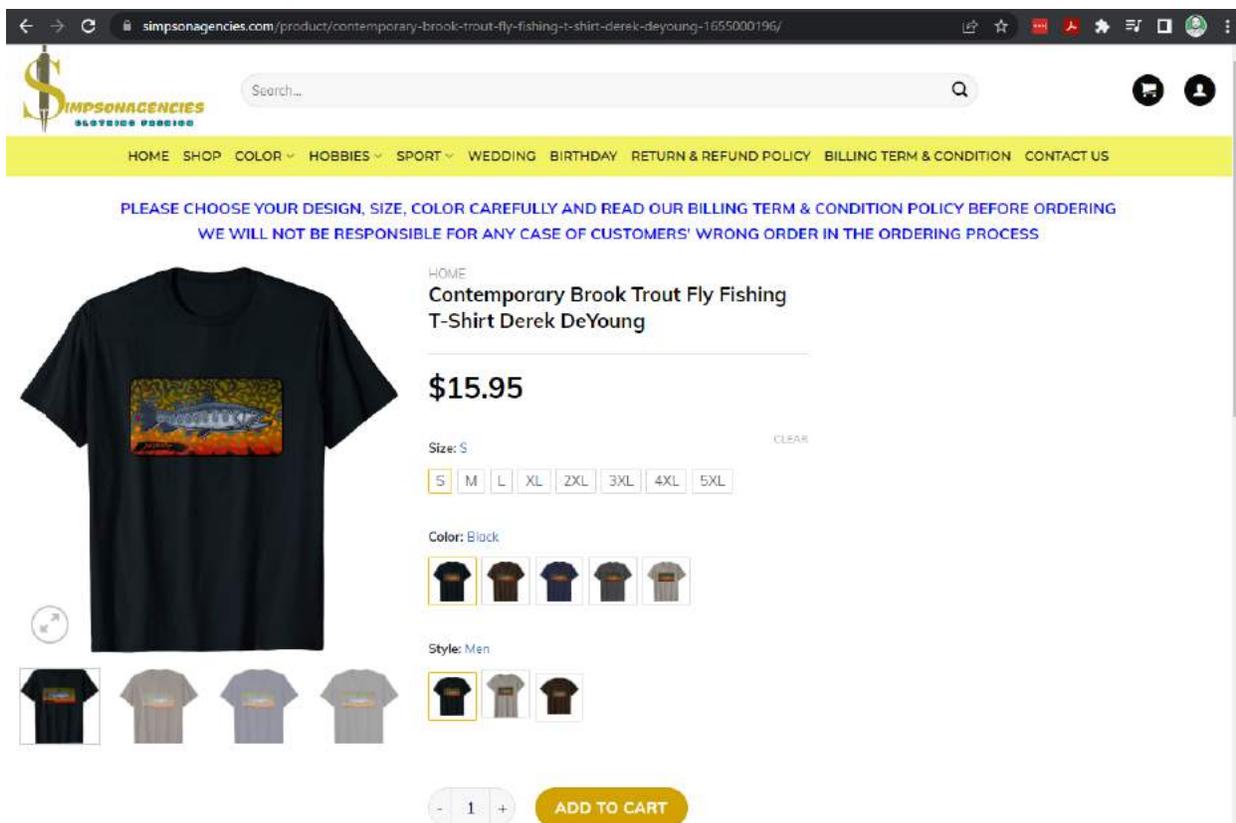
36. When a customer places an order via Defendants' online store, if Defendants decide to fill the order, they print the selected works on low-quality t-shirts, often overseas, and ship the counterfeit products into the United States to the customer.

37. Examples of Defendants' infringement of Plaintiffs' Works are displayed below:



The screenshot shows the website coolspod.com. The browser address bar displays the URL: coolspod.com/products/brown-trout-fish-art-t-shirt-derek-deyoung-fisherman-gift. A blue banner at the top reads "Buy More Save More, Order 2+ and save 10%". The site logo "coolspod" is on the left, and a search bar contains the text "Personalize Ornament, Dog Mom Search, Ornaments, Pillow...". Navigation links include "LGBT Gifts", "Father's Day Gifts", "3D All Over Print", "Baseball Cap", "Pet Memorial", "Holiday", and "Contact Us". The breadcrumb trail is "Home > Brown Trout Fish Art T-Shirt Derek DeYoung Fisherman Gift". The product image shows a grey t-shirt with a colorful fish design. A "Click to zoom" button is present. To the right, the product title is "Brown Trout Fish Art T-Shirt Derek DeYoung Fisherman Gift" with a price of "\$24.95". The color selection is "White" with a row of color swatches. The size selection is "Size guide" with buttons for S, M, L, XL, 2XL, 3XL, 4XL, and 5XL. A quantity selector shows "1" and a green "Buy It Now" button. A pink banner at the bottom says "BUY MORE SAVE MORE".

The screenshot shows the website teherivar.com. The browser address bar displays the URL: teherivar.com/product/brown-trout-and-dry-fly-derek-deyoung/. An orange banner at the top reads "2 items get 5% OFF | 4 items get 10% OFF | 6 items get 15% OFF". The site logo "HERIVAR" is on the left, and a search bar contains the text "Search designs and products". Navigation links include "Home", "Valentine's Day", "St.Patrick's Day", "Mother's Day", "Father's Day", "Halloween", "Christmas", "HOT TREND", "4TH OF JULY", "BIRTHDAY", and a "TRACK ORDER" button. The breadcrumb trail is "HOME / ANIMALS". The product image shows a white t-shirt with a colorful fish design. To the right, the product title is "Brown Trout And Dry Fly Derek DeYoung" with a price of "\$19.95". The style is "Unisex Tee" with a row of product icons. The color selection is "White" with a row of color swatches. The size selection is "Size guide" with buttons for S, M, L, XL, 2XL, 3XL, 4XL, and 5XL. A quantity selector shows "1" and an orange "BUY IT NOW" button.



Injury to Plaintiff and Consumers

38. Defendants' actions described above have damaged and irreparably harmed Canvasfish.

39. Consumers are highly likely to be confused due to Defendant's use of Plaintiff's exact trademark and copyrighted designs.

40. If allowed to continue advertising and providing retail store services and online retail store services under the DeYoung Mark, Defendants will further damage and injure Canvasfish's reputation and the goodwill associated with the DeYoung Mark, which are well-known to the relevant consumers as source identifiers for high-quality services.

41. If allowed to continue advertising and offering products and services under the DeYoung Mark, Defendants will continue to create significant likelihood of consumer confusion that will irreparably harm the public and its interest in being free from confusion.

42. Canvasfish has no adequate remedy at law.

43. Defendants knew or should have known that its activities described above constitute trademark infringement, copyright infringement, and unfair competition.

44. Defendants acted knowingly and willfully in reckless disregard of Canvasfish's rights.

FIRST CLAIM FOR RELIEF
Trademark Counterfeiting and Infringement
Under § 32(1) of the Lanham Act, 15 U.S.C. § 1114(1)

45. Canvasfish restates all prior paragraphs as if fully restated herein.

46. Defendants have used spurious designations that are identical to or substantially indistinguishable from the DeYoung Mark on goods covered by registrations for the DeYoung Mark.

47. Defendants' actions as described above are likely to cause confusion mistake or deception as to the origin, sponsorship, or approval of Defendants' products and commercial activities, and therefore constitute trademark infringement, counterfeiting, and unfair competition in violation of § 32(1) of the Lanham Act, 15 U.S.C. § 1114(1).

48. Defendants' actions described above have, at all times relevant to this action, been willful and intended to deceive consumers as to the source and authenticity of the Counterfeit Products.

49. Canvasfish has no adequate remedy at law and will continue to suffer irreparable harm to its reputation and goodwill if Defendants' actions are not enjoined.

50. As a foreseeable, direct, and proximate cause of Defendants' above-described actions, Canvasfish and consumers have been and will continue being irreparably damaged.

SECOND CLAIM FOR RELIEF
Copyright Infringement
Under 17 U.S.C. §§ 106 and 501

51. Canvasfish incorporates all foregoing paragraphs as if fully restated herein.

52. Canvasfish owns a copyright registration for each of the works stated in paragraph 17 above.

53. Canvasfish's Works are widely disseminated via its own website and social media accounts, and on physical products.

54. Defendants had access to Canvasfish's Works.

55. Defendants downloaded Canvasfish's Works from Canvasfish's website and/or authorized Amazon brand page for use in their infringement/counterfeit scheme.

56. Defendants have reproduced, prepared derivative works of, distributed copies of, imported into the US, and displayed publicly works that are identical copies of, or substantially similar to, Canvasfish's works.

57. As a result of Defendants' infringement, Canvasfish has suffered extensive monetary damages.

58. Canvasfish is entitled to the recovery of, at its election, statutory damages, actual damages, Defendant's profits, and the costs of this action.

59. Canvasfish is also entitled to preliminary and permanent injunctive relief pursuant to 17 U.S.C. § 502 and 17 U.S.C. § 106.

60. Canvasfish is also entitled its attorneys' fees pursuant to 17 U.S.C. § 505 and § 17 U.S.C. § 106.

PRAYER FOR RELIEF

WHEREFORE, Canvasfish respectfully requests that this Honorable Court grant the following relief:

1. That the Court preliminarily and permanently enjoin and restrain Defendants, as well as their heirs, successors, assigns, officers, agents, and employees from:
 - a. Reproducing, preparing derivative works of, distributing copies of, and displaying publicly Plaintiff Canvasfish's Works;
 - b. Manufacturing, importing, advertising, promoting, offering to sell, selling, distributing, or transferring any products bearing Plaintiff Canvasfish's trademark or any confusingly similar trademark;
 - c. Using the DeYoung Mark or any reproduction, counterfeit copies or imitations thereof in any manner in connection with the manufacturing, delivering, distribution, marketing, advertising, offering for sale, or sale of any product that is not a legitimate product bearing the DeYoung Mark or is not authorized by Plaintiff to be sold in connection with the DeYoung Mark;
 - d. Passing off, inducing, and/or enabling others to sell or pass off any product a genuine product bearing the DeYoung Mark or any other product produced by Plaintiff that is not Plaintiff's product or not otherwise produced with the authorization of Plaintiff for sale under the DeYoung Mark;
 - e. Committing any acts reasonably calculated to cause consumers to believe that Defendants' products bearing the DeYoung Mark are those sold under the authorization, control, and/or supervision of Plaintiff or sponsored by, approved by, or otherwise connected to Plaintiff;
 - f. Further infringing the DeYoung Mark and causing further damage to Plaintiff's goodwill; and
 - g. Aiding or assisting any other third party in subsections (a) and (f) above;
2. That the Court order that, upon Plaintiff's request, those with notice of the injunction, including, without limitation, any online marketplace platforms, disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of counterfeit and infringing goods using the DeYoung Mark;
3. That the Court award Canvasfish, at its election, its actual damages, lost profits, consequential damages, exemplary damages, statutory damages, and any other damages allowable under law, including an equitable accounting;
4. That the Court award Canvasfish its costs and attorneys' fees; and,

5. That the Court award Canvasfish any other relief to which it is entitled.

Respectfully submitted,

Date: September 16, 2022

/s/ Eric Misterovich
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Attorneys for Plaintiff

JURY DEMAND

Plaintiff hereby requests a trial by jury for all eligible counts contained within this Complaint.

Respectfully submitted,

Date: September 16, 2022

/s/ Eric Misterovich
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John Di Giacomo (P73056)
Eric Turnbull (P76382)
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