

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

DANIEL LACHMAN,

Plaintiff,

v.

THE INDIVIDUALS, PARTNERSHIPS, AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE "A,"

Defendants.

Civil Action No. 2:26-cv-1655

JURY TRIAL DEMANDED

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

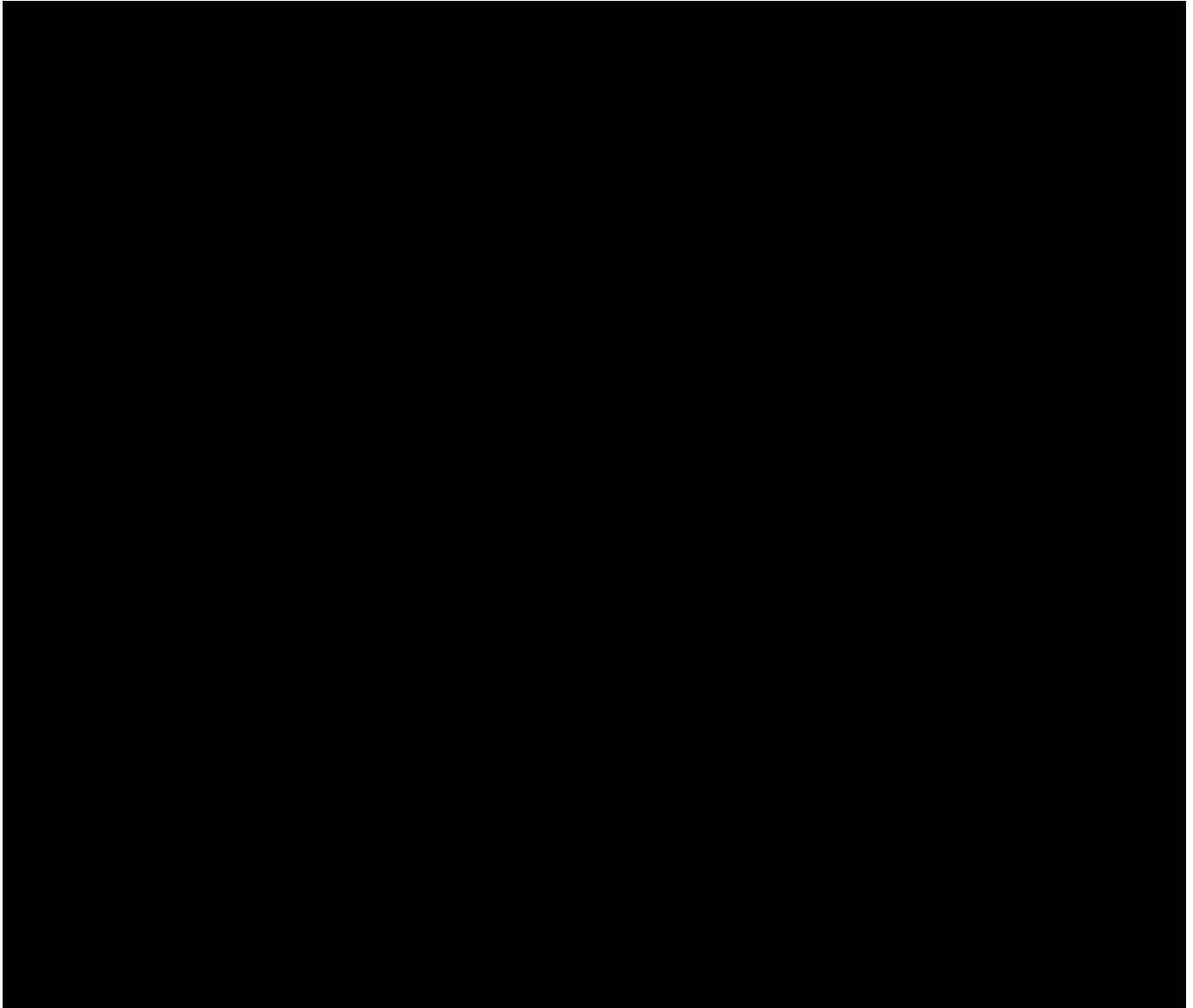
Plaintiff Daniel Lachman ("Plaintiff") hereby sues The Individuals, Partnerships, And Unincorporated Associations Identified In Schedule "A" hereto (collectively, "Defendants"). Defendants have infringed, and continue to infringe, Plaintiff's federally registered copyright in [REDACTED] and federally registered trademark [REDACTED] (the "Copyrighted Work" and the "Asserted Mark," as further defined below) by having manufactured, imported, offered for sale, and sold products bearing unauthorized copies and/or colorable imitations thereof (the "Infringing Products") through online commerce platforms including, but not limited to, Amazon.com ("Online Marketplaces"), in direct competition with Plaintiff's authorized products without authorization. In support of its claims, Plaintiff allege as follows:

NATURE OF LAWSUIT

1. Daniel Lachman is the copyright claimant and owner of all right, title, and interest in the Copyrighted Work with Registration Number [REDACTED] by written agreement with author Gabe Connor. He is also the owner of U.S. Trademark No. [REDACTED] for the mark [REDACTED] [REDACTED] (the "Asserted Mark"). True and correct copies of Plaintiff's copyright

registration certificate and trademark registration certificate are attached hereto as Exhibit 1 and Exhibit 2, respectively.

4. Below is a side-by-side comparison of Plaintiff's authorized product bearing the Copyrighted Work and Asserted Mark, and Defendants' Infringing Products:



See Exhibit 5.

5. The Infringing Products are substantially identical to each other and substantially identical to Plaintiff's authorized products bearing the Copyrighted Work and Asserted Mark, such that consumers are likely to be confused. Defendants' sale of Infringing Products not only infringes

Plaintiff's copyright and trademark rights but also is likely to confuse the consuming public and erode confidence in the market. Specifically: (a) all Infringing Products bear a copy or colorable imitation of the Copyrighted Work and/or the Asserted Mark; (b) any differences between the Infringing Products are merely aesthetic and do not diminish the overall substantially similar look and feel; and (c) all Defendants are intertwined in a web of infringement such that joinder is appropriate. See *Aquapaw Brands LLC v. Yan Peng, et al.*, No. 2:21-cv-01784-CCW, 2022 WL 3019807, at *3 (W.D. Pa. Jul. 29, 2022).

6. Defendants' importation, offer for sale, and sale of the Infringing Products in the United States all arise from the same transaction, occurrence, or series of transactions or occurrences. Specifically, Defendants are all importing, offering to sell, and selling products believed to be manufactured by the same foreign manufacturer or closely related entities, the identity of which is unknown to Plaintiff and concealed by Defendants. Defendants' Amazon.com listings for the Infringing Products do not identify the true manufacturer but, rather, misleadingly identify the seller as the "manufacturer," deceiving the consuming public as to the source of the goods sold.

7. Accordingly, this Complaint sets forth claims for trademark infringement and copyright infringement arising under the Lanham Act, 15 U.S.C. § 1051, et seq., and the Copyright Act, 17 U.S.C. § 101, et seq.

PLAINTIFF

8. Daniel Lachman is an individual residing at 7168 Ruane St, San Diego, California.

9. Daniel Lachman, as the assignee and copyright claimant by written agreement with author Gabe Connor, owns all right, title, and interest in, and has standing to sue for infringement of, the Copyrighted Work — [REDACTED] registered with the United States

Copyright Office under Registration [REDACTED] an effective date of registration of June 24, 2025 (a true and correct copy is attached as Exhibit 1) (the "Copyright Registration").

10. He is also the owner of U.S. Trademark [REDACTED] [REDACTED]. (a true and correct copy of the trademark registration is attached as Exhibit 2) (the "Asserted Mark").

11. No license or other rights to the Copyrighted Work or Asserted Mark have been granted to any Defendant in this action.

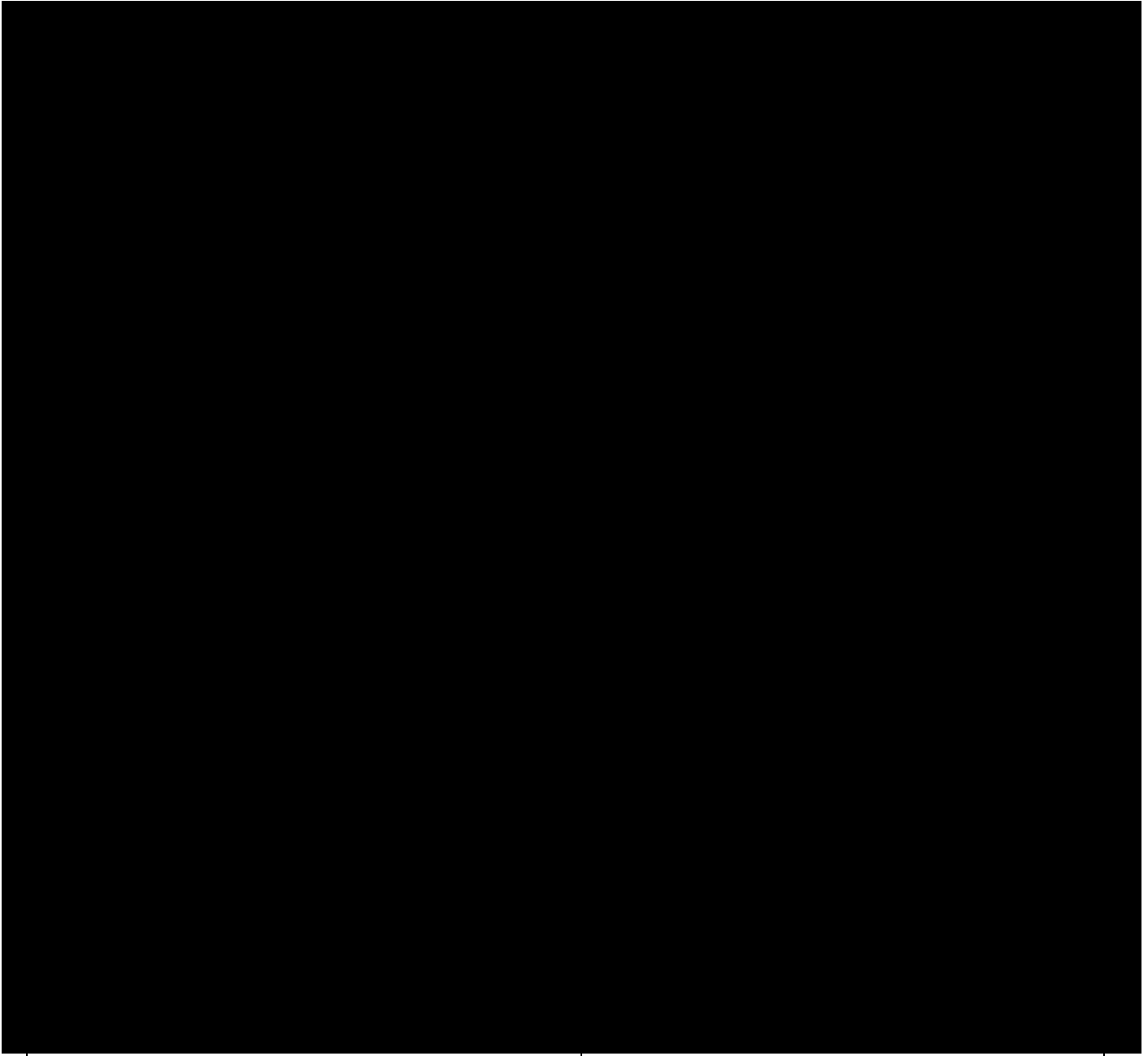
DEFENDANTS

13. Defendants are individuals and business entities of unknown makeup, each of whom, upon information and belief, reside or operate in foreign jurisdictions and redistribute products from the same or similar sources in those foreign locations. Defendants have the capacity to be sued pursuant to Federal Rules of Civil Procedure 17(b).

14. Defendants have manufactured on their behalf, import, offer for sale, and sell the Infringing Products, without Plaintiff's authorization, which Infringing Products infringe Plaintiff's Copyrighted Work and Asserted Mark. Defendants' Infringing Products are sold through Online Marketplaces in direct competition with Plaintiff's authorized products. Defendants are not licensees of the Copyright Registration or the Asserted Mark; Defendants pay no royalties on sales of their Infringing Products; and Defendants are causing price erosion through the sale of the Infringing Products to Plaintiff's detriment.

15. Defendants' Infringing Products consist of substantially identical reproductions, copies, or colorable imitations of the Copyrighted Work and/or Asserted Mark, featuring the same stylized [REDACTED] character, substantially identical graphic design elements, and the same or

confusingly similar text as Plaintiff's authorized products. The chart below compares Plaintiff's Copyrighted Work and Asserted Mark against Defendants' Infringing Products:



16. Defendants direct their business activities toward consumers in the United States, including in this Judicial District, through their operation of pseudo-anonymous online commerce

storefronts ("Online Storefronts") available in Online Marketplaces, including but not limited to Amazon.com.

17. Defendants use aliases in conjunction with the operation of their business as set forth in Schedule "A" hereto.

18. Defendants have infringed, and continue to infringe, the Copyrighted Work and Asserted Mark through their sales and offers for sale of the Infringing Products via their Online Storefronts.

19. Defendants are willfully promoting, advertising, distributing, having manufactured, importing, offering for sale, and selling the Infringing Products to consumers in the United States, and in this Judicial District, through Online Marketplaces using the Seller IDs set forth in Schedule "A" and other aliases not yet known to Plaintiff. Defendants have purposefully directed unlawful activities toward consumers in Pennsylvania (including this Judicial District) through their promotion, advertisement, distribution, importation, offer for sale, sale, and shipment of Infringing Products into this Judicial District. All Defendants stand ready, willing, and able to ship the Infringing Products to consumers in Pennsylvania and this Judicial District.

20. Defendants also engage in deceptive conduct by using misleading descriptions (e.g., manufacturer identification) associated with the Infringing Products sold through their Online Storefronts. Upon information and belief, at least some Defendants also inflate the number of reviews for Infringing Products by selling through Online Storefronts that already have reviews from other (often unrelated) products. Upon information and belief, at least some Defendants have engaged in other improper practices to manipulate the ratings and reviews associated with their Infringing Products, a common tactic by foreign sellers.

21. In order to sell through Online Marketplaces, Defendants must register, establish or purchase, and maintain Online Storefronts and Seller IDs associated therewith. Upon information and belief, Defendants have engaged in fraudulent conduct with respect to the registration of their Online Storefronts and Seller IDs by providing false and misleading information to the operators of the Online Marketplaces. Upon information and belief, Defendants have anonymously registered and maintained some Seller IDs for the sole purpose of engaging in unauthorized, deceptive, and infringing activities, without regard for United States laws.

22. Upon information and belief, Defendants will continue to register or acquire new Seller IDs and aliases for the purpose of offering for sale and selling Infringing Products unless enjoined.

23. Defendants' business names, Seller IDs, associated payment accounts, and any other aliases used in connection with the sale of the Infringing Products are essential components of Defendants' online activities and are the means by which Defendants perpetuate their infringement scheme and harm Plaintiff.

JURISDICTION AND VENUE

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

25. Personal jurisdiction over a non-resident of the State in which the Court sits is proper to the extent authorized by the state's laws. Fed. R. Civ. P. 4(e). Pennsylvania authorizes personal jurisdiction over each Defendant pursuant to § 5322 of the Pennsylvania Consolidated Statutes, Title 42, which provides in pertinent part:

(a) General Rule. A tribunal of this Commonwealth may exercise personal jurisdiction over a person ... who acts directly or by an agent, as to a cause of action or other matter arising from such person:

(1) Transacting any business in this Commonwealth [including, but not limited to:] ...

(i) The doing by any person in this Commonwealth of a series of similar acts for the purpose of thereby realizing pecuniary benefit or otherwise accomplishing an object.

(ii) The doing of a single act in this Commonwealth for the purpose of thereby realizing pecuniary benefit or otherwise accomplishing an object with the intention of initiating a series of such acts.

(iii) The shipping of merchandise directly or indirectly into or through this Commonwealth.

(iv) The engaging in any business or profession within this Commonwealth.

(2) Causing harm or tortious injury by an act or omission in this Commonwealth.

(3) Causing harm or tortious injury in this Commonwealth by an act or omission outside this Commonwealth.

(4) Committing any violation within the jurisdiction of this Commonwealth of any statute ... or rule or regulation promulgated thereunder by any government unit.

(b) Exercise of full constitutional power over nonresidents. In addition to the provisions of subsection (a) the jurisdiction of the tribunals of this Commonwealth shall extend to all persons who are not within the scope of section 5301 (relating to persons) to the fullest extent allowed under the Constitution of the United States and may be based on

the most minimum contact with this Commonwealth allowed under the Constitution of the United States.

42 Pa. Cons. Stat. § 5322.

26. Federal Rules of Civil Procedure 4(k) confers personal jurisdiction over the Defendants because Defendants regularly conduct, transact, and solicit business in Pennsylvania and in this Judicial District and, upon information and belief, derive substantial revenue from their business transactions in Pennsylvania and this Judicial District. Defendants have availed themselves of the privileges and protections of the laws of Pennsylvania, such that this Court's assertion of jurisdiction over Defendants does not offend traditional notions of fair play and due process. For example:

- a. At all relevant times, Defendants have directed their business activities at consumers in Pennsylvania via Online Marketplaces, through which consumers in Pennsylvania can view Defendants' Online Storefronts, communicate with Defendants regarding the Infringing Products, and place orders for, purchase, and receive delivery of Defendants' Infringing Products in Pennsylvania.
- b. Defendants directly sold Infringing Products into Pennsylvania and into this district. (See Exhibit 4, Proof of Defendants' sales into Pennsylvania.)
- c. Defendants are sophisticated sellers through Online Marketplaces, each operating one or more commercial businesses through which Defendants operate Online Storefronts to promote, advertise, distribute, offer for sale, and sell the Infringing Products imported into the United States.

- d. Defendants (although foreign entities) accept payment in U.S. Dollars and offer shipping to Pennsylvania and this Judicial District (and calculate tax based on sales into Pennsylvania and this Judicial District).
- e. Upon information and belief, Defendants have cooperated, communicated, shared information, and coordinated their efforts to create an infringing marketplace operating in parallel to Plaintiff's legitimate marketplace, including employing and benefiting from substantially similar paid advertising, marketing, and SEO strategies to make their Online Storefronts appear more relevant to consumers searching for [REDACTED] merchandise. By their actions, Defendants are causing concurrent and indivisible harm to Plaintiff by: (1) depriving Plaintiff of its right to fairly compete for space within Online Marketplaces' search results; (2) diluting and eroding the retail market price for Plaintiff's products; (3) causing overall degradation of the value of goodwill associated with the Copyrighted Work and Asserted Mark; and (4) increasing Plaintiff's overall cost to market its goods.
- f. Defendants are concurrently targeting their infringing activities toward consumers in, and causing harm in, Pennsylvania.
- g. Defendants reside and operate in foreign jurisdictions with lax enforcement systems and are cooperating to create an illegal stream of infringing goods. (See, e.g., <https://sellerdefense.cn/>). Defendants regularly remove and add products from their Online Storefronts, making it extremely difficult for Plaintiff to enforce its intellectual property rights under the laws of the United States.

- h. Upon information and belief, Defendants are aware of Plaintiff and the Copyrighted Work and Asserted Mark, and are aware that their infringement is likely to cause harm to Plaintiff in the United States, Pennsylvania, and this Judicial District.
- i. Plaintiff are suffering irreparable and indivisible injury and has suffered substantial damages as a result of Defendants' unauthorized sale of the Infringing Products in direct competition with Plaintiff's authorized products.

27. Venue in this judicial district is proper, inter alia, under 28 U.S.C. §§ 1391 and 1400(a): Defendants do not reside in the United States and are subject to venue in any district. Further, Defendants solicit business from this Judicial District and, upon information and belief, conduct and transact significant business in this Judicial District. See Exhibit 4.

DEFENDANTS' UNLAWFUL CONDUCT

28. Defendants are, through at least their Online Storefronts operated under their Seller IDs, promoting, advertising, distributing, offering for sale, and selling the Infringing Products — goods that bear unauthorized copies or colorable imitations of Plaintiff's Copyrighted Work and/or Asserted Mark.

29. Defendants are marketing the Infringing Products through unfair, deceptive, and fraudulent means. Specifically, Defendants have made, and continue to make, false claims as to the source or origin of the Infringing Products, as Defendants regularly fabricate the "manufacturer" listed on their Online Storefronts. Upon information and belief, Defendants import, offer for sale, and sell the Infringing Products, which are believed to be made by the same foreign entity (or closely related entities); however, Defendants regularly mis-identify the "manufacturer" when, in fact, they do not manufacture the Infringing Products. Defendants'

intentional concealment of the manufacturer has prevented Plaintiff from confirming the identity thereof.

30. Defendants have engaged, and continue to engage, in industry-wide cooperation with respect to the product design and manufacture of the Infringing Products. Even if Defendants have not engaged in direct concerted action, the "independent" acts of Defendants have nevertheless concurred to produce indivisible harmful consequences to Plaintiff.

31. Upon information and belief, Defendants are (in violation of Amazon.com's terms of service) piggybacking multiple products through the same listings, which allows the ratings for one product to impute to the Infringing Products. Because consumers look to review counts in making purchasing decisions, inflated review counts deceive customers as to the popularity and quality of products being sold, a deceptive practice that has resulted in actions brought by the Federal Trade Commission ("FTC"). (See, e.g., <https://www.ftc.gov/news-events/news/press-releases/2023/02/ftc-charges-supplement-marketer-hijacking-ratings-reviews-amazoncom-using-them-deceive-consumers>). Relatedly, upon information and belief, Defendants are improperly attempting to generate increased ratings through fake or paid-for reviews.

32. Defendants have engaged in the aforementioned improper conduct in addition to their infringement of the Copyrighted Work and Asserted Mark.

33. As part of Defendants' overall infringement scheme, Defendants are, upon information and belief, concurrently employing and benefiting from substantially similar advertising and marketing strategies designed to make the Infringing Products appear more relevant and attractive to consumers online. By their actions, Defendants are contributing to the creation and maintenance of an unauthorized marketplace operating in parallel to Plaintiff's legitimate marketplace.

34. The foregoing unlawful conduct by Defendants has caused, and will continue to cause, individual, concurrent, and indivisible harm to Plaintiff and the consuming public. Specifically, Defendants are: (1) depriving Plaintiff of their right to fairly compete for space within the various Online Marketplaces' search results and reducing the visibility of Plaintiff's products; (2) diluting and eroding the retail market price for Plaintiff's authorized products; (3) causing overall degradation of the value of goodwill associated with the Copyrighted Work and Asserted Mark; and (4) increasing Plaintiff's overall cost to market its goods.

35. Plaintiff confirmed that each Defendant was, and is currently, offering for sale and selling the Infringing Products to the consuming public via their Online Storefronts using their Seller IDs. Plaintiff have confirmed that Defendants provide shipping, have actually shipped, and/or stand ready, willing, and able to ship the Infringing Products to customers in this Judicial District. Plaintiff were able to purchase at least one product from each Defendant with shipment thereof to Pennsylvania (in this Judicial District), establishing at the pleading stage that personal jurisdiction over each Defendant named in Schedule A exists.

36. In addition to the above-described unlawful activities, Defendants are infringing the Copyrighted Work and Asserted Mark knowingly and intentionally, or at least with reckless disregard or willful blindness to Plaintiff's rights. If Defendants' infringing activities are not preliminarily and permanently enjoined by this Court, Plaintiff and the consuming public will continue to be harmed.

37. Upon information and belief, Defendants' payment and financial accounts are being used by Defendants to accept, receive, and deposit profits from Defendants' infringing activities connected to their Seller IDs and any other alias online commerce stores, seller identification names, domain names, or websites being used or controlled by them.

38. Upon information and belief, Defendants are likely to transfer or hide their assets to avoid payment of any monetary judgment awarded to Plaintiff.

39. Given the likelihood that Defendants will simply transfer money from their accounts and open new product listings to continue selling the Infringing Products, Plaintiff have no adequate remedy at law. Plaintiff are suffering irreparable injury and has suffered substantial damages as a result of Defendants' unauthorized and wrongful infringement of the Copyrighted Work and Asserted Mark.

40. The harm and damages sustained by Plaintiff have been directly and proximately caused by Defendants' infringement of the Copyrighted Work and Asserted Mark in the United States.

COUNT I

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

41. Plaintiff reallege and incorporate by reference paragraphs 1–40, inclusive, as though fully set forth herein.

42. This is a trademark infringement action against Defendants based on their unauthorized use in commerce of counterfeit imitations or colorable imitations of Plaintiff's [REDACTED] [REDACTED] (the "Asserted Mark") in connection with the sale, offering for sale, distribution, and/or advertising of infringing goods. The Asserted Mark is distinctive and, when applied to Plaintiff's goods, signals to purchasers that the products come from Plaintiff and are manufactured to Plaintiff's quality standards. Consumers have come to expect the highest quality from products offered, sold, or marketed under the Asserted Mark.

43. Defendants have sold, offered to sell, marketed, distributed, and advertised, and are still selling, offering to sell, marketing, distributing, and advertising products using unauthorized reproductions or colorable imitations of the Asserted Mark without Plaintiff's permission.

44. Daniel Lachman is the owner and applicant of the Asserted Mark. On information and belief, Defendants have knowledge of Plaintiff's rights in the Asserted Mark and are willfully infringing and intentionally using counterfeit or colorable imitation versions of the Asserted Mark. Defendants' willful, intentional, and unauthorized use of the Asserted Mark is likely to cause and is causing confusion, mistake, and deception as to the origin and quality of the Infringing Products among the general public. Specifically, Defendants' Infringing Products feature the same or substantially similar design, text, and imagery as Plaintiff's authorized products bearing the Asserted Mark, such that an ordinary consumer exercising ordinary care would be likely to be confused, mistaken, or deceived as to the source, sponsorship, or authorization of the Infringing Products.

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

46. Plaintiff have no adequate remedy at law and, if Defendants' actions are not enjoined, Plaintiff will continue to suffer irreparable harm to its reputation and the goodwill associated with the Asserted Mark.

47. The injuries and damages sustained by Plaintiff have been directly and proximately caused by Defendants' wrongful reproduction, use, advertisement, promotion, offering to sell, and sale of Infringing Products.

COUNT II

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

48. Plaintiff reallege and incorporate by reference the allegations set forth in the preceding paragraphs.

49. Defendants' promotion, marketing, offering for sale, and sale of the Infringing 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 Plaintiff, or the origin, sponsorship, or approval of Defendants' Infringing Products by Plaintiff.

50. By using the Asserted Mark and/or a colorable imitation thereof in connection with the Infringing Products, Defendants create a false designation of origin and a misleading representation of fact as to the origin and sponsorship of the Infringing Products.

51. Defendants' false designation of origin and misrepresentation of fact as to the origin and/or sponsorship of the Infringing Products to the general public is a willful violation of Section 43 of the Lanham Act, 15 U.S.C. § 1125(a).

52. Plaintiff have no adequate remedy at law and, if Defendants' actions are not enjoined, Plaintiff will continue to suffer irreparable harm to its reputation and the goodwill associated with the Asserted Mark and Copyrighted Work.

COUNT III

COPYRIGHT INFRINGEMENT (17 U.S.C. §§ 106 AND 501)

53. Plaintiff realleges and incorporate by reference the allegations set forth in the preceding paragraphs.

54. The [REDACTED]

[REDACTED]
[REDACTED] — constitutes an original work and copyrightable subject matter pursuant to the Copyright Act, 17 U.S.C. §§ 101, et seq.

55. Daniel Lachman is the owner of all right, title, and interest in the Copyrighted Work by written agreement with author Gabe Connor. Daniel has complied with the registration requirements of 17 U.S.C. § 411(a) for the Copyrighted Work. The Copyrighted Work is protected by U.S. Copyright Registration No. VA 2-465-935, duly issued by the United States Copyright Office, with an effective date of registration of June 24, 2025. (See Exhibit 1.) At all relevant times, Daniel has been and still is the owner of all rights, title, and interest in the Copyrighted Work, which has never been assigned, licensed, or otherwise transferred to Defendants.

56. The Copyrighted Work is published on the Internet and available to Defendants online. As such, Defendants had access to the Copyrighted Work via the Internet and through the various Online Marketplaces where Plaintiff's authorized products are offered for sale.

57. Without authorization from Plaintiff, or any right under the law, Defendants have deliberately copied, displayed, distributed, reproduced, and/or made derivative works incorporating the Copyrighted Work on e-commerce stores operating under the Seller Aliases and the corresponding Infringing Products. Defendants' reproductions are virtually identical to and/or are substantially similar to the look and feel of the Copyrighted Work, capturing the total concept and feel of the Copyrighted Work. Such conduct infringes and continues to infringe the Copyrighted Work in violation of 17 U.S.C. § 501(a) and 17 U.S.C. §§ 106(1)–(3), (5).

58. Defendants reap the benefits of the unauthorized copying and distribution of the Copyrighted Work in the form of revenue and other profits that are driven by the sale of the Infringing Products.

59. Defendants have unlawfully appropriated Plaintiff's protectable expression by taking material of substance and value and creating Infringing Products that capture the total concept and feel of the Copyrighted Work.

60. On information and belief, Defendants' infringement has been willful, intentional, purposeful, and in disregard of and with indifference to Plaintiff's rights.

61. The Defendants, by their actions, have damaged Plaintiff in an amount to be determined at trial.

62. Defendants' conduct is causing and, unless enjoined and restrained by this Court, will continue to cause Plaintiff great and irreparable injury that cannot fully be compensated or measured in money. Plaintiff have no adequate remedy at law. Pursuant to 17 U.S.C. § 502, Plaintiff are entitled to a preliminary and permanent injunction prohibiting further infringement of the Copyrighted Work.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demand judgment on all Counts of this Complaint and an award of equitable and monetary relief against Defendants — jointly — as follows:

A. Entry of temporary, preliminary, and permanent injunctions pursuant to 15 U.S.C. § 1116 and 17 U.S.C. § 502, and Federal Rules of Civil Procedure 65, against Defendants, their agents, representatives, servants, employees, and all of those acting in concert or participation therewith, including but not limited to an injunction prohibiting Defendants from: (i) using the Asserted Mark 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 authorized by Plaintiff; (ii) reproducing, distributing copies of, making derivative works of, or publicly displaying the Copyrighted Work in any manner without the express authorization of Plaintiff; and (iii) passing off, inducing, or enabling others to sell or pass off any product as an authentic Plaintiff product that is not produced under the authorization, control, or supervision of Plaintiff.

B. Entry of an Order that, upon Plaintiff's request, those with notice of the injunction, including without limitation any online marketplace platforms such as Amazon.com, Walmart.com, eBay, Etsy, Temu, and DHgate ("Third Party Providers"), shall disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of the Infringing Products.

C. Entry of an Order requiring Defendants to account for and pay to Plaintiff all profits realized by Defendants by reason of Defendants' unlawful acts, and that the amount of damages for infringement of the Asserted Mark be increased by a sum not exceeding three times the amount thereof as provided by 15 U.S.C. § 1117(a).

D. In the alternative, that Plaintiff be awarded statutory damages for willful trademark infringement or counterfeiting pursuant to 15 U.S.C. § 1117(c)(2) of \$2,000,000 for each and every use of the Asserted Mark.

E. As a direct and proximate result of Defendants' infringement of the Copyrighted Work, Plaintiff are entitled to damages as well as Defendants' profits, pursuant to 17 U.S.C. § 504(b).

F. Alternatively, and at Plaintiff's election prior to any final judgment, Plaintiff are entitled to the maximum amount of statutory damages of \$150,000 per work infringed pursuant to 17 U.S.C. § 504(c), or such other amount as may be proper pursuant to 17 U.S.C. § 504(c).

G. Plaintiff are further entitled to recover its attorneys' fees and full costs for bringing this action pursuant to 17 U.S.C. § 505 and 15 U.S.C. § 1117(a).

H. Entry of an award of pre- and post-judgment interest on the judgment amount.

I. Entry of an order for any further relief as the Court may deem just and proper.

JURY DEMAND

Plaintiff Daniel Lachman and Gabe Connor demand a trial by jury on all issues so triable.

Dated: August 6, 2026

Respectfully submitted,

By: /s/ Xiyang Zhang

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