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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

10 L.A. PRINTEX INDUSTRIES, INC., a
11 California Corporation

12 Plaintiff,

13 vs.

14
15 ROSS STORES, INC., a Delaware
16 Corporation; ALARMEX HOLDINGS
17 GROUP LLC, a New York Limited
18 Liability Company, APPAREL
19 HOLDINGS GROUP LLC, a New York
20 Limited Liability Company; UNO
21 CLOTHING, INC, a California
22 Corporation; MACKSON, INC., a New
23 York Corporation, INTERTEX
24 APPAREL, LTD., a New York
25 Corporation; and DOES 1 through 10,

26 Defendants.

27 L.A. Printex Industries, Inc. ("Plaintiff"), by and through its undersigned
28 attorneys, hereby prays to this honorable Court for relief based on the following:

2008 FEB 11 PM 2:46

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

Case No. **CV08-00930 MMMPJW**

PLAINTIFF'S COMPLAINT FOR:

1. COPYRIGHT INFRINGEMENT;

AND

2. VICARIOUS AND/OR
CONTRIBUTORY COPYRIGHT
INFRINGEMENT.

Jury Trial Demanded

INTRODUCTION

Plaintiff creates unique designs and silk-screens, prints and manufactures rotary printed textiles, primarily for use in the garment industry. This action is brought to recover damages for direct, vicarious and contributory copyright infringement arising out of the misappropriation of Plaintiff's intellectual property by the Defendants, and each of them.

JURISDICTION AND VENUE

1. This action arises under the Copyright Act of 1976, Title 17 U.S.C., § 101 *et seq.*

2. This Court has federal question jurisdiction under 28 U.S.C. § 1331 and 1338 (a) and (b).

3. Venue in this judicial district is proper under 28 U.S.C. § 1391(c) and 1400(a) in that this is the judicial district in which a substantial part of the acts and omissions giving rise to the claims occurred.

PARTIES

4. Plaintiff L.A. Printex Industries, Inc. ("L.A. Printex") is a corporation organized and existing under the laws of the State of California with its principal place of business located at 3270 East 26th Street, Vernon, California 90023.

5. Plaintiff is informed and believes and thereon alleges that Defendant ROSS STORES, INC. ("ROSS") is a corporation organized and existing under the laws of the State of Delaware and doing business in and with the State of California.

6. Plaintiff is informed and believes and thereon alleges that APPAREL HOLDINGS GROUP LLC ("AHG") is a corporation organized and existing under the laws of the State of New York doing business in and with the State of California.

1 7. Plaintiff is informed and believes and thereon alleges that ALARMEX
2 HOLDINGS GROUP LLC ("ALARMEX") is a corporation organized and existing
3 under the laws of the State of New York doing business in and with the State of
4 California.

5 8. Plaintiff is informed and believes and thereon alleges that UNO
6 CLOTHING, INC. ("UNO") is a corporation organized and existing under the laws
7 of the State of California doing business in and with the State of California.

8 9. Plaintiff is informed and believes and thereon alleges that MACKSON,
9 INC. is a corporation organized and existing under the laws of the State of New
10 York doing business in and with the State of California.

11 10. Plaintiff is informed and believes and thereon alleges that INTERTEX
12 APPAREL, LTD. ("INTERTEX") is a corporation organized and existing under the
13 laws of the State of New York doing business in and with the State of California.

14 11. Plaintiff is informed and believes and thereon alleges that some of
15 Defendants DOES 1 through 3, inclusive, are manufacturers and/or vendors of
16 garments to Defendant, which DOE Defendants have manufactured and/or supplied
17 and are manufacturing and/or supplying garments comprised of fabric printed with
18 Plaintiff's copyrighted designs (as hereinafter defined) without Plaintiff's knowledge
19 or consent or have contributed to said infringement. The true names, whether
20 corporate, individual or otherwise of Defendants DOES 1-3, inclusive, are presently
21 unknown to Plaintiff, which therefore sues said Defendants by such fictitious names
22 and will seek leave to amend this complaint to show their true names and capacities
23 when same have been ascertained.

24 12. Defendants DOES 4 through 10, inclusive, are other parties not yet
25 identified who have infringed Plaintiff's copyrights, have contributed to the
26 infringement of Plaintiff's copyrights, or have engaged in one or more of the
27 wrongful practices alleged herein. The true names, whether corporate, individual or
28

1 otherwise, of Defendants 4 through 10, inclusive, are presently unknown to Plaintiff,
2 which therefore sues said Defendants by such fictitious names, and will seek leave to
3 amend this Complaint to show their true names and capacities when same have been
4 ascertained.

5 13. Plaintiff is informed and believes and thereon alleges that at all times
6 relevant hereto each of the Defendants was the agent, affiliate, officer, director,
7 manager, principal, alter-ego, and/or employee of the remaining Defendants and was
8 at all times acting within the scope of such agency, affiliation, alter-ego relationship
9 and/or employment; and actively participated in or subsequently ratified and
10 adopted, or both, each and all of the acts or conduct alleged, with full knowledge of
11 all the facts and circumstances, including, but not limited to, full knowledge of each
12 and every violation of Plaintiff's rights and the damages to Plaintiff proximately
13 caused thereby.

14 **CLAIMS RELATED TO DESIGN C30158**

15 14. At least as early as 2006, Plaintiff was publishing and/or offering for sale a
16 two-dimensional artistic rendering of a blooming heart motif which it had allocated
17 Internal Design Code C30158 ("Subject Design A"). A true and correct copy of
18 Subject Design A is attached hereto as Exhibit 1. This artwork is, and at all relevant
19 times was, owned in exclusivity by Plaintiff.

20 15. On October 24, 2006, Plaintiff applied for and received a United States
21 Copyright Registration for Subject Design A. A true and correct copy of this
22 document, which reflects the allocation of registration code VA 1-404-245 to
23 Subject Design A, is attached hereto as Exhibit 2.

24 16. On May 12, 2007, Plaintiff's investigation into the unlawful use of its
25 proprietary designs revealed that ROSS was purchasing, distributing and selling for
26 profit, garments which infringed Subject Design A. A true and correct copy of an
27
28

1 exemplar of a garment sold by ROSS in violation of Plaintiff's copyright in Subject
2 Design A is attached hereto as Exhibit 3.

3 17.Plaintiff's investigation further revealed that the garments set forth in the
4 preceding paragraph were supplied to ROSS by UNO, a clothing vendor and
5 importer based in Vernon, California, in close proximity to Plaintiff's design
6 showroom. These transactions were not authorized by Plaintiff, and violated
7 Plaintiff's intellectual property rights in Subject Design A.

8 **CLAIMS RELATED TO DESIGN E50142**

9 18.At least as early as 2005, Plaintiff was publishing and offering for sale a
10 two-dimensional artistic rendering of paisley, floral and border elements which it
11 had allocated Internal Design Code E50142 ("Subject Design B"). A true and
12 correct copy of Subject Design B is attached hereto as Exhibit 4. This artwork is, and
13 at all relevant times was, owned in exclusivity by Plaintiff.

14 19.On April 10, 2006, Plaintiff applied for and received a United States
15 Copyright Registration for Subject Design B. A true and correct copy of this
16 document, which reflects the allocation of registration code Vau 1-375-813 to
17 Subject Design B, is attached hereto as Exhibit 5.

18 20.On May 17, 2007, Plaintiff's investigation into the unlawful use of its
19 proprietary designs revealed that ROSS was purchasing, distributing and selling for
20 profit, garments which infringed Subject Design B. A true and correct copy of an
21 exemplar of a garment sold by ROSS in violation of Plaintiff's copyright in Subject
22 Design A is attached hereto as Exhibit 6.

23 21.Plaintiff's investigation further revealed that the garments set forth in the
24 preceding paragraph were supplied to ROSS by UNO, a clothing vendor and
25 importer based in Vernon, California, in close proximity to Plaintiff's design
26 showroom. These transactions were not authorized by Plaintiff, and violated
27 Plaintiff's intellectual property rights in Subject Design B.
28

CLAIMS RELATED TO DESIGN D40093

22. At least as early as 2003, Plaintiff was publishing and offering for sale a two-dimensional artistic rendering of floating intertwined floral abstractions with stylized stem accompaniment which it had allocated Internal Design Code D40093 ("Subject Design C"). A true and correct copy of Subject Design C is attached hereto as Exhibit 7. This artwork is, and at all relevant times was, owned in exclusivity by Plaintiff.

23. On April 29, 2004 Plaintiff applied for and received a United States Copyright Registration for Subject Design C. A true and correct copy of this document, which reflects the allocation of registration code Vau 628-916 to Subject Design C, is attached hereto as Exhibit 8.

24. On April 27, 2005, Plaintiff's investigation into the unlawful use of its proprietary designs revealed that ROSS was purchasing, distributing and selling for profit, garments which infringed Subject Design C. A true and correct copy of an exemplar of a garment sold by ROSS in violation of Plaintiff's copyright in Subject Design A is attached hereto as Exhibit 9.

25. Plaintiff's investigation further revealed that the garments set forth in the preceding paragraph were supplied to ROSS by AHG, a clothing vendor and importer. Said investigation revealed that AHG had manufactured these garments overseas in India and illegally imported them into the United States. These transactions were not authorized by Plaintiff, and violated Plaintiff's intellectual property rights in Subject Design C.

CLAIMS RELATED TO DESIGN G70147

26. At least as early as 2002, Plaintiff was publishing and offering for sale a two-dimensional artistic rendering of stylized military insignias which it had allocated Internal Design Code G70147 ("Subject Design D"). A true and correct

1 copy of Subject Design D is attached hereto as Exhibit 10. This artwork is, and at all
2 relevant times was, owned in exclusivity by Plaintiff.

3 27. On February 21, 2006, Plaintiff applied for and received a United States
4 Copyright Registration for Subject Design D. A true and correct copy of this
5 document, which reflects the allocation of registration code Vau 1-360-756 to
6 Subject Design D, is attached hereto as Exhibit 11.

7 28. On March 16, 2007, Plaintiff's investigation into the unlawful use of its
8 proprietary designs revealed that ROSS was purchasing, distributing and selling for
9 profit, garments which infringed Subject Design D. A true and correct copy of an
10 exemplar of a garment sold by ROSS in violation of Plaintiff's copyright in Subject
11 Design D is attached hereto as Exhibit 12.

12 29. Plaintiff's investigation further revealed that the garments set forth in the
13 preceding paragraph were supplied to ROSS by INTERSTYLE, a clothing vendor.
14 This transaction was not authorized by Plaintiff and violated Plaintiff's intellectual
15 property rights in Subject Design D.

16 **CLAIMS RELATED TO DESIGN K0169**

17 30. At least as early as 2003, Plaintiff was publishing and offering for sale vivid
18 colorations of a two-dimensional artistic rendering of vertically arranged tropical
19 floral elements which it had allocated Internal Design Code K0169 ("Subject
20 Design E"). A true and correct copy of Subject Design E is attached hereto as
21 Exhibit 13. This artwork is, and at all relevant times was, owned in exclusivity by
22 Plaintiff.

23 31. On September 21, 2004, Plaintiff applied for and received a United States
24 Copyright Registration for Subject Design E. A true and correct copy of this
25 document, which reflects the allocation of registration code Vau 1-624-383 to
26 Subject Design E, is attached hereto as Exhibit 14.

1 32. On May 2, 2007, Plaintiff's investigation into the unlawful use of its
2 proprietary designs revealed that ROSS was purchasing, distributing and selling for
3 profit, garments which infringed Subject Design E. A true and correct copy of an
4 exemplar of a garment sold by ROSS in violation of Plaintiff's copyright in Subject
5 Design E is attached hereto as Exhibit 15.

6 33. Plaintiff's investigation further revealed that the garments set forth in the
7 preceding paragraph were supplied to ROSS by MACKSON, a clothing vendor and
8 importer. Said investigation revealed that MACKSON had manufactured these
9 garments overseas in China and illegally imported them into the United States. These
10 transactions were not authorized by Plaintiff, and violated Plaintiff's intellectual
11 property rights in Subject Design E.

12 34. Subject Designs A -E will be collectively referred to as "Subject Designs."

13 35. Plaintiff served cease and desist demands on Defendants, and each,
14 mandating that they cease their respective infringements of the Subject Designs and
15 provide an accounting of their respective acts of infringement. Defendants failed to
16 sufficiently respond.

17 36. Prior to the alleged infringement, Plaintiff had formatted the Subject
18 Designs for use on textiles, sampled the Subject Designs to prospective customers
19 and negotiated sales of fabric bearing the Subject Design.

20 37. Plaintiff is informed and believes and thereon alleges that, without
21 Plaintiff's authorization, Defendants, and each of them, purchased, sold,
22 manufactured, caused to be manufactured, imported and/or distributed fabric and/or
23 garments comprised of fabric featuring a design which is identical to, or substantially
24 similar to, the Subject Designs. Plaintiff is informed and believes that this conduct
25 continued to occur subsequent to Defendants, and each of their, receipt of the
26 aforementioned cease and desist demands.

1 38. The garments, as which garments were manufactured under the direction of
2 the Defendants, and each of them. Plaintiff is informed and believes and thereon
3 alleges that one or more of the named Defendants owns and/or otherwise controls
4 these labels and caused garments under those labels to be manufactured.

5
6 **FIRST CLAIM FOR RELIEF**

7 (For Copyright Infringement - Against All Defendants, and Each)

8 39. Plaintiff repeats, realleges and incorporates herein by reference as though
9 fully set forth the allegations contained in the preceding paragraphs, inclusive, of this
10 Complaint.

11 40. Plaintiff is informed and believes and thereon alleges that Defendants, and
12 each of them, had access to the Subject Designs, including, without limitation,
13 through (a) access to Plaintiff's showroom and/or design library; (b) access to
14 illegally distributed copies of the Subject Designs by third-party vendors and/or
15 DOE Defendants, including without limitation international and/or overseas
16 converters and printing mills; (c) access to garments sold at retail or wholesale stores
17 which are comprised of authentic L.A. Printex fabric; and (d) access to Plaintiff's
18 fabric swatches, strike-offs and samples.

19 41. Plaintiff is informed and believes and thereon alleges that one or more of
20 the Defendants manufactures garments and/or is a garment vendor. Plaintiff is
21 further informed and believes and thereon alleges that said Defendant(s) has an
22 ongoing business relationship with Defendant retailers, and each of them, and
23 supplied garments to said retailers, which garments infringed the Subject Designs in
24 that said garments were composed of fabric which featured unauthorized print
25 designs that were identical or substantially similar to the Subject Designs.

26 42. Plaintiff is informed and believes and thereon alleges that Defendants, and
27 each of them, infringed Plaintiff's copyright by creating, making and/or developing
28

1 directly infringing and/or derivative works from the Subject Designs and by
2 producing, distributing and/or selling infringing garments through a nationwide
3 network of retail stores and through on-line websites.

4 43. Due to Defendants' acts of infringement, Plaintiff has suffered substantial
5 damages to its business in an amount to be established at trial.

6 44. Due to Defendants' acts of infringement, Plaintiff has suffered general and
7 special damages in an amount to be established at trial.

8 45. Due to Defendants' acts of copyright infringement as alleged herein,
9 Defendants, and each of them, have obtained direct and indirect profits they would
10 not otherwise have realized but for their infringement of the Subject Designs. As
11 such, Plaintiff is entitled to disgorgement of Defendant's profits directly and
12 indirectly attributable to Defendant's infringement of the Subject Designs in an
13 amount to be established at trial.

14 46. Plaintiff is informed and believes and thereon alleges that Defendants, and
15 each of them, have continued to import, manufacture, cause to be manufactured
16 and/or sell infringing garments after Plaintiff demanded that they cease and desist
17 from engaging in same. Therefore, Defendants' acts of copyright infringement as
18 alleged above were, and continue to be, willful, intentional and malicious, subjecting
19 Defendants, and each of them, to liability for statutory damages under Section
20 504(c)(2) of the Copyright Act in the sum of up to one hundred fifty thousand dollars
21 (\$150,000) per infringement. Further, Defendants', and each of their, willful and
22 intentional misappropriation and/or infringement of Plaintiff's copyrighted Subject
23 Designs renders Defendants, and each of them, liable for enhanced and statutory
24 damages as described herein. Within the time permitted by law, Plaintiff will make
25 its election between actual damages and statutory damages.

26 ///

27 ///

SECOND CLAIM FOR RELIEF

(For Vicarious and/or Contributory Copyright Infringement - Against All Defendants, and Each)

47. Plaintiff repeats, realleges and incorporates herein by reference as though fully set forth the allegations contained in the preceding paragraphs, inclusive, of this Complaint.

48. Plaintiff is informed and believes and thereon alleges that Defendants knowingly induced, participated in, aided and abetted in and profited from the illegal reproduction and/or subsequent sales of garments featuring the Subject Designs as alleged hereinabove.

49. Plaintiff is informed and believes and thereon alleges that Defendants, and each of them, are vicariously liable for the infringement alleged herein because they had the right and ability to supervise the infringing conduct and because they had a direct financial interest in the infringing conduct.

50. By reason of the Defendants', and each of their, acts of contributory infringement as alleged above, Plaintiff has suffered and will continue to suffer substantial damages to its business in an amount to be established at trial, as well as additional general and special damages in an amount to be established at trial.

51. Due to Defendants' acts of copyright infringement as alleged herein, Defendants, and each of them, have obtained direct and indirect profits they would not otherwise have realized but for their infringement of the Subject Designs. As such, Plaintiff is entitled to disgorgement of Defendants' profits directly and indirectly attributable to Defendants' infringement of the Subject Designs, in an amount to be established at trial.

52. Plaintiff is informed and believes and thereon alleges that Defendants, and each of them, have continued to manufacture and/or sell Infringing Garments after Plaintiff demanded that they cease and desist from engaging in same. Therefore,

Defendants' acts of copyright infringement as alleged above were, and continue to be, willful, intentional and malicious, subjecting Defendants, and each of them, to liability therefore, including statutory damages under Section 504(c)(2) of the Copyright Act in the sum of one hundred fifty thousand dollars (\$150,000) per infringement. Further, Defendants', and each of their, willful and intentional misappropriation and/or infringement of Plaintiff's copyrighted Subject Designs renders Defendants, and each of them, liable for statutory damages as described herein. Within the time permitted by law, Plaintiff will make its election between actual damages and statutory damages.

PRAYER FOR RELIEF

Wherefore, Plaintiff prays for judgment as follows:

Against All Defendants

1. **With Respect to Each Claim for Relief**

- a. That Defendants, their agents and servants be enjoined from selling product, or otherwise engaging in acts, infringing Plaintiff's copyrights in the Subject Designs;
- b. That Plaintiff be awarded all profits of Defendants plus all losses of Plaintiff, the exact sum to be proven at the time of trial, or, if elected before final judgment, statutory damages as available under the Copyright Act, 17 U.S.C. § 101 et seq.;
- c. That Plaintiff be awarded its attorneys' fees as available under the Copyright Act, 17 U.S.C. § 101 et seq.;
- d. That Defendants, and each of them, account to Plaintiff for their profits and any damages sustained by Plaintiff arising from the foregoing acts of infringement;
- e. That Plaintiff be awarded pre-judgment interest as allowed by law;
- f. That Plaintiff be awarded the costs of this action; and

1 g. That Plaintiff be awarded such further legal and equitable relief as the
2 Court deems proper.

3 Plaintiff demands a jury trial pursuant to Fed. R. Civ. P. 38 and the 7th
4 Amendment to the United States Constitution.

5 Dated: February 8, 2008

DONIGER LAW FIRM APC

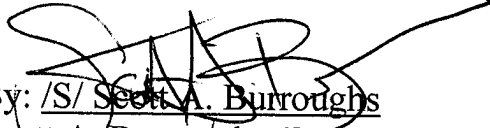
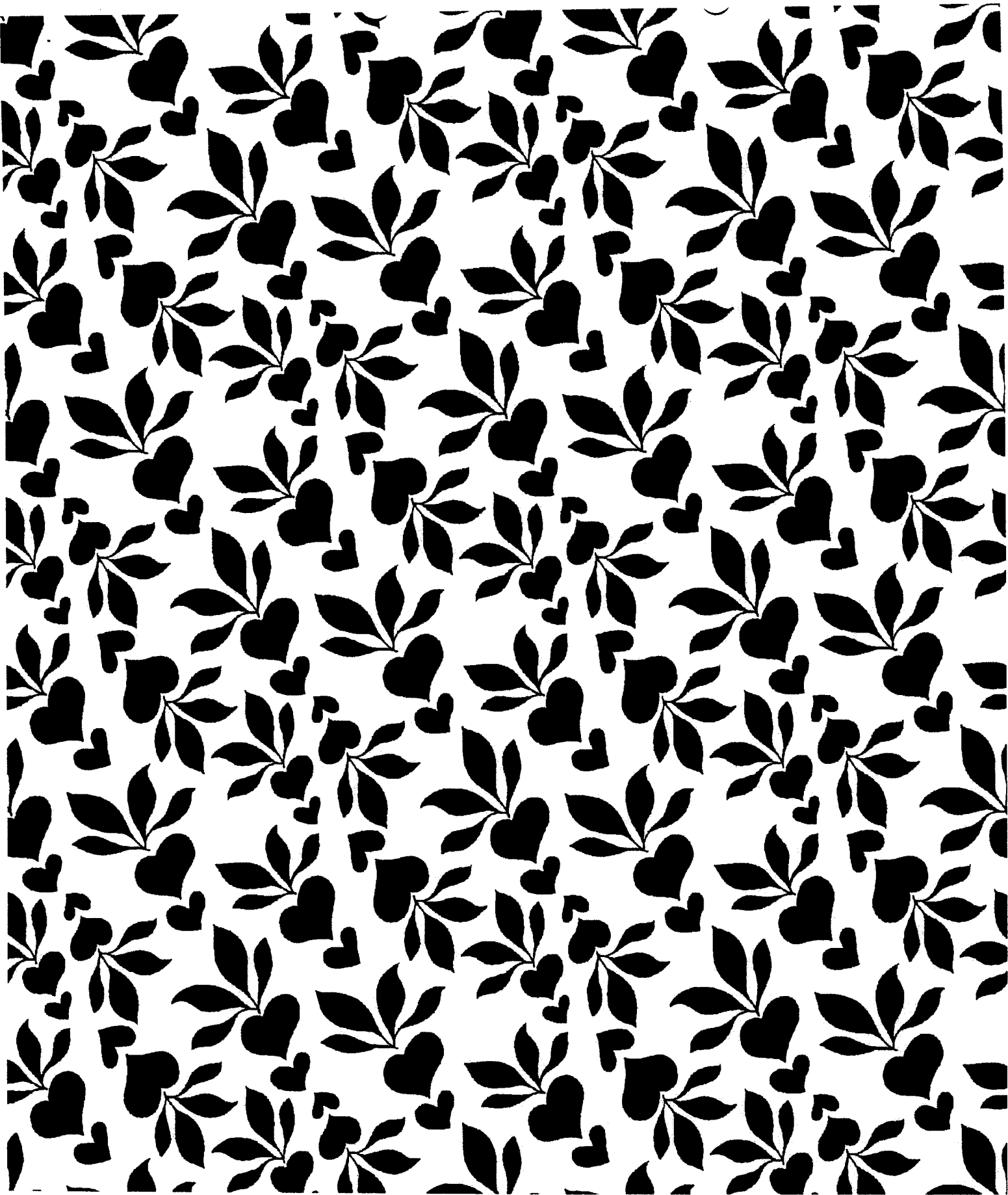
6
7 
8 By: /S/ Scott A. Burroughs
9 Scott A. Burroughs, Esq.
10 Attorneys for Plaintiff
11 L.A. PRINTEX INDUSTRIES, INC.
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Exhibit 1



C30158

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Exhibit 2

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America



Form VA

For a Work of the Visual Arts
Requires filing copyright notice

VA 1-404-245



EFFECTIVE DATE OF REGISTRATION

OCT 24 2006

STATE CONTINUATION SHEET

1 Title of This Work **▼** **NATURE OF THIS WORK **▼** See Instructions**

LAP 06-CS **TEXTILE DESIGN**

Previous or Alternative Titles **▼**
C30153, C30156 C30158 C30160, C30161

Publication as a Contribution If this work was published in a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work **▼**

Published in a periodical or serial give: Volume **▼** Number **▼** Issue Date **▼** On Page **▼**

2 **NAME OF AUTHOR **▼**** **DATES OF BIRTH AND DEATH**

a LA PRINTEX INDUSTRIES INC Year Born **▼** Year Died **▼**

NOTE Under the law the author of a work made for hire is generally the employer, not the employee (see instructions). For any part of this work that was made for hire check: Yes in the space provided, give the employer (or other person for whom the work was prepared) as "author" of that part and leave the space for dates of birth and death blank.

Was this contribution to the work a "work made for hire"? ☒ Yes ☐ No

Author's Nationality or domicile: Name of Country **OR** Citizen of **OR** Domiciled in: USA

Was This Author a Contributor to the Work? Anonymous? ☐ Yes ☐ No Pseudonym? ☐ Yes ☐ No

Nature of Authorship Check appropriate box(es). See instructions.

☐ 3 Dimensional sculpture ☐ Map ☐ Technical drawing

☐ 2 Dimensional artwork ☐ Photograph ☐ Text

☐ Reproduction of work of art ☐ Jewelry design ☐ Architectural work

Name of Author **▼** **Dates of Birth and Death**

b LA PRINTEX INDUSTRIES, INC Year Born **▼** Year Died **▼**

Was this contribution to the work a "work made for hire"? ☒ Yes ☐ No

Author's Nationality or domicile: Name of Country **OR** Citizen of **OR** Domiciled in: USA

Was This Author's Contribution to the Work? Anonymous? ☐ Yes ☐ No Pseudonym? ☐ Yes ☐ No

Nature of Authorship Check appropriate box(es). See instructions.

☐ 3 Dimensional sculpture ☐ Map ☐ Technical drawing

☐ 2 Dimensional artwork ☐ Photograph ☐ Text

☐ Reproduction of work of art ☐ Jewelry design ☐ Architectural work

3 **Year in Which Creation of This Work Was Completed** **2006** **Date and Month of First Publication of This Particular Work** Month **OCTOBER** Day **15** Year **2006**

a This information must be given in all cases. b Complete this information ONLY if this work has been published.

4 **COPYRIGHT CLAIMANT(S)** Name and address must be given even if the claimant is the same as the author given in space 2. **LA PRINTEX INDUSTRIES INC**
3270 E 26TH ST VERNON CA 90023

Transfer: If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. **▼**

APPLICATION RECEIVED **MAY 07 2007** **Oct 24 2006**
ONE DEPOSIT RECEIVED
MAY 07 2007 **Oct 24 2006**
TWO DEPOSITS RECEIVED
FUNDS RECEIVED

MORE ON BACK **▶**

Complete all applicable spaces (numbers 1-6) on the reverse side of this page. See detailed instructions. Sign the form at top 8.

DO NOT WRITE BEYOND
Page 1 of 2

EXAMINED BY SPW

FORM VA

CHECKED BY

☒ CORRESPONDENCE

Yes

FOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?☐ Yes ☐ No If your answer is "Yes," why is another registration being sought? (Check appropriate box.) ☐ aa. ☐ This is the first published edition of a work previously registered in unpublished form.b. ☐ This is the first application submitted by this author as copyright owner.c. ☐ This is a changed version of the work, as shown by space 8 on this application.If your answer is "Yes," give: Previous Registration Number ☐Year of Registration ☐

5

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation.a. **Preexisting Material** Identify any preexisting work or works that this work is based on or incorporates ☐

6

a

See INSTRUCTIONS
before completing
this spaceb. **Material Added to This Work** Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ☐

b

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account. ☐

7

a

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name / Address / Apt / City / State / Zip ☐

b

LA PRINTEX INDUSTRIES INC
3270 E 26TH ST VERNON CA 90023

Area code and daytime telephone number (323) 269-0100

Fax number (323) 269-0190

E-mail

CERTIFICATION I, the undersigned, hereby certify that I am thecheck only one ☐☐ author☐ other copyright claimant☒ owner of exclusive right(s)☐ authorized agent of

Name of author or other copyright claimant, or owner of exclusive right(s)

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge

Typed or printed name and date ☐ If this application gives a date of publication in space 5, do not sign and submit it before that date.

JAB SOON NAH

Date APRIL 30, 2007

Handwritten signature ☐

x

Certificate
will be
mailed in
window
envelope
to this
address.Name ☐
LA PRINTEX INDUSTRIES INCName/Address ☐

3270 E 26TH ST

City/State/Zip ☐

VERNON CA 90023

Complete all necessary forms

Sign and submit in space 8

1. **Registration Fee**
2. **Nonreturnable filing fee** to check or survey
your rights in Register of Copyrights
3. **Deposit material**Library of Congress
Copyright Office
101 Independence Avenue SE
Washington, DC 20540-4001

9

If U.S. Patent and Trademark Office makes a false representation of a material fact in the application for copyright registration provided for by section 408 or in any written statement filed in connection with the application, shall be fined not more than \$2,000

Exhibit 3



Exhibit 4

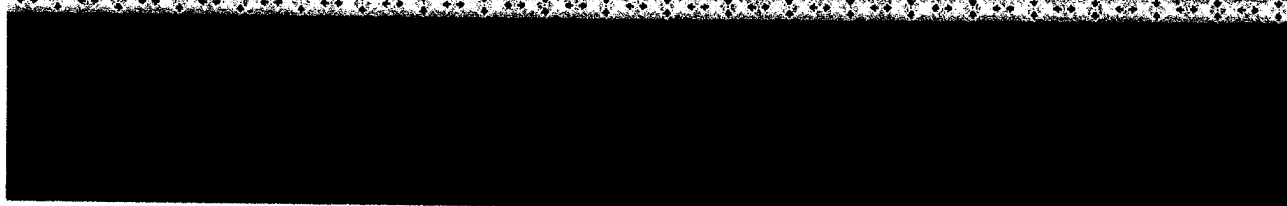


Exhibit 5

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Form VA
For a Work of the Visual Arts
UNITED STATES COPYRIGHT OFFICE

VA 1-375-813



4-10-06

RATE CONTINUATION SHEET.

Title of This Work **1**

NATURE OF THIS WORK **TEXTILE DESIGN**

LAPRINTEX GROUP E-3

TEXTILE DESIGN

Previous or Alternative Titles **2**

E50136, E50137, E50139, E50140, E50141, E50142, E50144, E50145, E50146, E50147, E50148, E50154

Publication as a Contribution If the work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work **3**

If published in a periodical or serial give Volume **4**

Number **5**

Issue Date **6**

On Page **7**

NAME OF AUTHOR **2**

LA PRINTEX INDUSTRIES, INC.

DATE OF BIRTH AND DEATH

Year Born **8**

Year Died **9**

Was this contribution to the work a "work made for hire"? **10**

☒ Yes

☐ No

Author's Nationality or Domicile

Name of Country

OR ☐ Citizen of

☐ Domiciled in

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☐ No

Pseudonym? ☐ Yes ☐ No

If the answer to either of these questions is "Yes," see detailed instructions.

Nature of Authorship Check appropriate box(es). See instructions.

☐ 3-Dimensional sculpture

☐ Map

☐ Technical drawing

☒ 2-Dimensional artwork

☐ Photograph

☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

Name of Author **11**

LA PRINTEX INDUSTRIES, INC.

Date of Birth and Death

Year Born **12**

Year Died **13**

Was this contribution to the work a "work made for hire"? **14**

☒ Yes

☐ No

Author's Nationality or Domicile

Name of Country

OR ☐ Citizen of

☐ Domiciled in

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☐ No

Pseudonym? ☐ Yes ☐ No

If the answer to either of these questions is "Yes," see detailed instructions.

Nature of Authorship Check appropriate box(es). See instructions.

☐ 3-Dimensional sculpture

☐ Map

☐ Technical drawing

☒ 2-Dimensional artwork

☐ Photograph

☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

Year in Which Creation of This Work Was Completed **15**

2005

This information must be given in all cases.

Date and Month of First Publication of This Particular Work **16**

Complete this information about **17**

JAN

2

2005

USA

Notes

4 COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the owner in the author given in space 2. **18**

**LA PRINTEX INDUSTRIES, INC.
3270 E. 26th St.
VERNON, CA. 90023**

APPLICATION RECEIVED

APR 10 2006

ONE DEPOSIT RECEIVED

APR 10 2006

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

Transfer If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. **19**

MORE ON BACK

• Complete all applicable spaces (numbered 1-19) on the reverse side of this page.
• See detailed instructions.
• Sign the form at the bottom.

DO NOT WRITE BELOW
Page 1 of 2 pages

EXAMINED BY <i>jm/mc</i>	FORM VA
CHECKED BY	
<input checked="" type="checkbox"/> CORRESPONDENCE	FOR
<input checked="" type="checkbox"/> Yes	COPYRIGHT
	OFFICE
	USE
	ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of the work, already been made in the Copyright Office?

Yes ☐ No ☒ If your answer is "Yes," why is another registration being sought? (Check appropriate box) ☐a. ☐ This is the first published edition of a work previously registered in unpublished form.b. ☐ This is the first application submitted by this author as copyright claimant.c. ☐ This is a changed version of the work, as shown by space 4 on this application.If your answer is "Yes," give Previous Registration Number ☐Year of Registration ☐

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation.

a. Presenting Material Identify any presenting work or works that this work is based on or incorporates. ☐

a. See instructions before completing this space.

b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ☐

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name ☐Account Number ☐CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP ☐

LA PRINTEX INDUSTRIES, INC.

3270 E 26TH ST

VERNON, CA 90023

Area code and daytime telephone number (323) 269 - 0100

Fax number (323) 269 - 0100

E-mail ☐

CERTIFICATION I, the undersigned, hereby certify that I am the

check only one ☐☐ author☐ other copyright claimant☒ owner of exclusive rights☐ authorized agent ofName of author or other copyright claimant, or owner of exclusive rights ☐

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date ☐ If this application gives a date of publication in space 3, do not sign and submit it before that date.

JAE SOON, NAE

Date 3/23/06

Handwritten signature (X) ☒

Certificate will be mailed in window envelope to this address:

Name ☐

LA PRINTEX INDUSTRIES, INC

Number/Street/Apt ☐

3270 E 26th ST

City/State/ZIP ☐

VERNON, CA 90023

- Complete all necessary spaces -
- Sign your application in space 81. Filing fee
2. Photocopy fee (see fee schedule or money order payable to Register of Copyrights)
3. Deposit materialLibrary of Congress
Copyright Office
101 Independence Avenue, S.E.
Washington, D.C. 20540-4000

For questions about this form, contact the Copyright Office at (202) 707-6000 or visit the Copyright Office website at www.copyright.gov

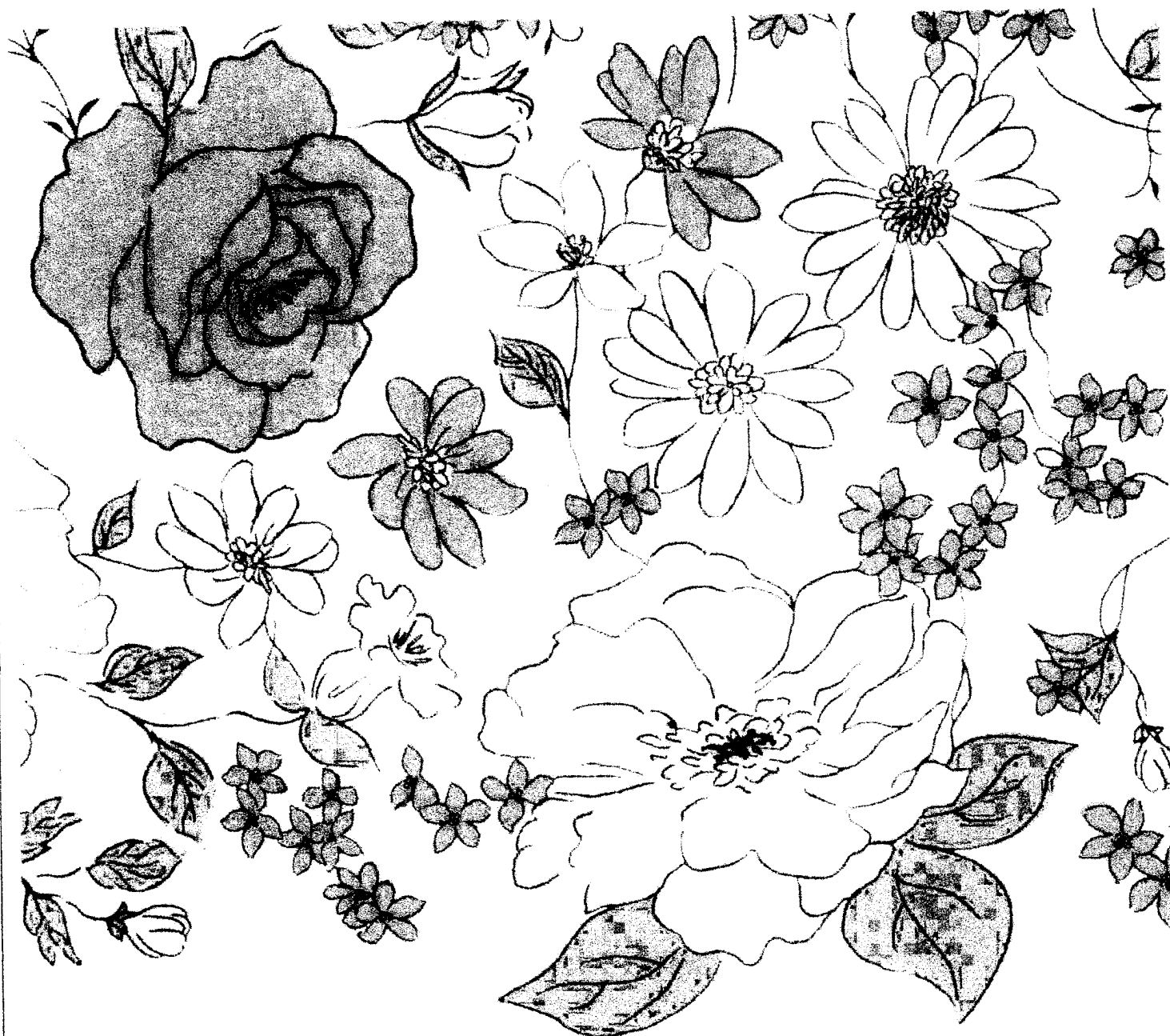
17 USC § 405(a) Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 405, or in any written statement filed in connection with the application, shall be fined not more than \$2,000.

Exhibit 6



Exhibit 7

D40093.TIF



THE FOLLOWING INFORMATION IS A SUMMARY OF THE INFORMATION CONTAINED IN THE ATTACHED DOCUMENTS. IT IS NOT A VERIFICATION OF THE INFORMATION CONTAINED IN THE ATTACHED DOCUMENTS. IT IS THE RESPONSIBILITY OF THE USER TO OBTAIN THE FULL TEXT OF THE ATTACHED DOCUMENTS AND TO REVIEW THEM FOR THE INFORMATION THEY CONTAIN.

THE FOLLOWING INFORMATION IS A SUMMARY OF THE INFORMATION CONTAINED IN THE ATTACHED DOCUMENTS. IT IS NOT A VERIFICATION OF THE INFORMATION CONTAINED IN THE ATTACHED DOCUMENTS. IT IS THE RESPONSIBILITY OF THE USER TO OBTAIN THE FULL TEXT OF THE ATTACHED DOCUMENTS AND TO REVIEW THEM FOR THE INFORMATION THEY CONTAIN.

Exhibit 8

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

FORM VA

For a Work of the Visual Arts
UNITED STATES COPYRIGHT OFFICE

REC

VAU 628-196



EFFECTIVE DATE OF REGISTRATION

APR 29 2004
Month Day Year

RATE CONTINUATION SHEET

TITLE OF THIS WORK ▼

BORDER GROUP A

NATURE OF THIS WORK ▼ See instructions

TEXTILE DESIGN

PREVIOUS OR ALTERNATIVE TITLES ▼

D-40175, D-40147, D-40093, D-40082

Publication as a Contribution: If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼

Number ▼

Issue Date ▼

On Pages ▼

NAME OF AUTHOR ▼

a LA PRINTEX

DATES OF BIRTH AND DEATH

Year Born ▼

Year Died ▼

Was this contribution to the work a "work made for hire"? ☐ Yes ☐ No

Author's Nationality or Domicile
Name of Country

OR { Citizen of LA
Domiciled in LA

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☐ No

Pseudonym? ☐ Yes ☒ No

If the answer to either of these questions is "Yes" see detailed instructions

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions

☐ 3-Dimensional sculpture

☐ Map

☐ Technical drawing

☒ 2-Dimensional artwork

☐ Photograph

☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

NAME OF AUTHOR ▼

b LA PRINTEX

DATES OF BIRTH AND DEATH

Year Born ▼

Year Died ▼

Was this contribution to the work a "work made for hire"? ☐ Yes ☐ No

Author's Nationality or Domicile
Name of Country

OR { Citizen of LA
Domiciled in LA

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☐ No

Pseudonym? ☐ Yes ☒ No

If the answer to either of these questions is "Yes" see detailed instructions

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions

☐ 3-Dimensional sculpture

☐ Map

☐ Technical drawing

☒ 2-Dimensional artwork

☐ Photograph

☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

Year in Which Creation of This Work Was Completed

2003

This information must be given in all cases.

Date and Nation of First Publication of This Particular Work

Complete this information ONLY if this work has been published.

Month ▼

Day ▼

Year ▼

Nation ▼

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2 ▼

LA PRINTEX

3270 E 26th St.

Vernon, CA 90023

Transfer: If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

APPLICATION RECEIVED

APR 29 2004

ONE DEPOSIT RECEIVED

APR 29 2004

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

MORE ON BACK ▶


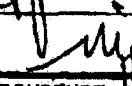
Complete all applicable spaces (numbers 5-8) on the reverse side of this page. See detailed instructions. Sign the form at the 6

DO NOT WRITE HERE

NOTE

Under the law the author of a work made for hire is generally the employer not the employee (see instruction 5a). For any part of this work that was made for hire check Yes in the space provided give the employer (or other person for whom the work was prepared) as Author of that part and leave the space for dates of birth and death blank.

See instructions before completing this space

EXAMINED BY 	FORM VA
CHECKED BY 	
<input type="checkbox"/> CORRESPONDENCE	FOR
Yes	COPYRIGHT
	OFFICE
	USE
	ONLY

DO NOT WRITE ABOVE THIS LINE IF YOU NEED MORE SPACE USE A SEPARATE CONTINUATION SHEET

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work already been made in the Copyright Office?

☐ Yes ☐ No If your answer is "Yes, why is another registration being sought? (Check appropriate box) ▾a. ☐ This is the first published edition of a work previously registered in unpublished formb. ☐ This is the first application submitted by this author as copyright claimantc. ☐ This is a changed version of the work, as shown by space 6 on this application

If your answer is Yes, give Previous Registration Number ▾

Year of Registration ▾

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work, complete only 6b for a compilation

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates ▾

See instructions
before completing
this space

b. Material Added to This Work Give a brief general statement of the material that has been added to this work and in which copyright is claimed. ▾

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account
Name ▾ Account Number ▾

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP ▾

LA PRINTEX
3270 E 26th St
Vernon, CA 90023

ATT. MOON/OWNER

Area code and daytime telephone number ▾ 323' 269-0100

Fax number ▾ 323' 267-0900

Email ▾

CERTIFICATION* I, the undersigned, hereby certify that I am the

check only one ▸

- ☐ author
- ☐ other copyright claimant
- ☐ owner of exclusive right(s)
- ☐ authorized agent of _____

Name of author or other copyright claimant, or owner of exclusive right(s) A

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge

Typed or printed name and date ▾ If this application gives a date of publication in space 3 do not sign and submit it before that date

Moon

Date ▾ 11-08-03

Handwritten signature (X) ▾



Moon

Certificate
will be
mailed in
window
envelope
to this
address

Name ▾	LA printex
Number/Street/Apt ▾	3270 E 26th St
City/State/ZIP ▾	Vernon, CA 90023

YOU MUST	9
Complete all necessary spaces Sign your application in space 8	
1. Application form 2. Nonrefundable filing fee in check or money As of July 1, 2008, the filing fee for Form VA is \$50. 3. Deposit material	
DELIVER TO Library of Congress Copyright Office 101 Independence Avenue S.E. Washington, D.C. 20540-0000	

Exhibit 9



Exhibit 10

G70147

Exhibit 11

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America



Form VA

For a Work of the Visual Arts
UNITED STATES COPYRIGHT OFFICE

VA 1-360-756



EFFECTIVE DATE OF REGISTRATION

2-21-06
Month Day Year

SEPARATE CONTINUATION SHEET.

1

Title of This Work ▼
CONVERSATIONAL (Group 04)

NATURE OF THIS WORK ▼ See Instructions

TEXTILE DESIGN

Previous or Alternative Titles ▼

HB0088, HB0089, HB0090, HB0091, HB0092, D40308, G70146, G70147, G70148, G70149, G70150, G70151

Publication as a Contribution: If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼

Number ▼

Issue Date ▼

On Page ▼

2

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer the author for whom the work was prepared as "Author" of that part, and leave the space for date of birth and death blank.

NAME OF AUTHOR ▼
LA PRINTEX INDUSTRIES, INC.

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"?
☐ Yes
☐ No

Author's Nationality or Domicile
Name of Country

OR
Citizen of
Domiciled in USA

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

If the answer to either of these questions is "Yes," see detailed instructions.

Nature of Authorship Check appropriate box(es). See instructions

- ☐ 3-Dimensional sculpture ☐ Map ☐ Technical drawing
☒ 2-Dimensional artwork ☐ Photograph ☐ Text
☐ Reproduction of work of art ☐ Jewelry design ☐ Architectural work

Name of Author ▼
LA PRINTEX INDUSTRIES, INC.

Dates of Birth and Death
Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"?
☐ Yes
☐ No

Author's Nationality or Domicile
Name of Country

OR
Citizen of
Domiciled in USA

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

If the answer to either of these questions is "Yes," see detailed instructions.

Nature of Authorship Check appropriate box(es). See instructions

- ☐ 3-Dimensional sculpture ☐ Map ☐ Technical drawing
☒ 2-Dimensional artwork ☐ Photograph ☐ Text
☐ Reproduction of work of art ☐ Jewelry design ☐ Architectural work

3

Year in Which Creation of This Work Was Completed
2006

This information must be given in all cases.

Date and Month of First Publication of This Particular Work

Complete this information ONLY if this work has been published. Month JANUARY Day 30 Year 2006

4

See instructions before completing this space.

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

LA PRINTEX INDUSTRIES, INC.
3270 E. 26TH ST. VERNON, CA 90023

Transfer: If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

APPLICATION RECEIVED
FEB 21 2006

ONE DEPOSIT RECEIVED
FEB 21 2006

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

MORE ON BACK ▶

- Complete all applicable spaces (numbers 3-4) on the reverse side of this page.
- See detailed instructions.
- Sign the form at the 5.

DO NOT WRITE HERE

Page 1 of 2 pages

EXAMINED BY

FORM VA

CHECKED BY

☐ CORRESPONDENCE
Yes
FOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

☐ Yes ☐ No If your answer is "Yes," why is another registration being sought? (Check appropriate box.)
a. ☐ This is the first published edition of a work previously registered in unpublished form.b. ☐ This is the first application submitted by this author as copyright claimant.c. ☐ This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number

Year of Registration

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation.

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates.

b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed.

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.
Name
Account Number

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP

LA PRINTEX INDUSTRIES, INC.
3270 E. 26TH ST. VERNON, CA 90023

Area code and daytime telephone number (323) 269-0100

Fax number (323) 269-0190

E-mail

CERTIFICATE OF REGISTRATION

check only one

- ☐ author
☐ other copyright claimant
☒ owner of exclusive right(s)
☐ authorized agent of

Name of author or other copyright claimant, or owner of exclusive right(s)

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date If this application gives a date of publication in space 5, do not sign and submit it before that date.

JAE SOON, NAE

Date FEB. 08.2006

Handwritten signature (X) ☒Certificate
will be
mailed in
window
envelope
to this
addressName
LA PRINTEX INDUSTRIES, INC.

Mailing/Street/Apt

3270 E. 26TH ST.

City/State/ZIP

VERNON, CA 90023

- Complete all necessary steps
- Sign your application in space 8

1. Application form
2. Nonrefundable filing fee in check or money order payable to Registrar of Copyrights
3. Deposit material

Library of Congress
Copyright Office
101 Independence Avenue, S.E.
Washington, D.C. 20540-4000

17 U.S.C. § 405(c): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 405, or in any written statement filed in connection with the application, shall be fined not more than \$5,000.

Exhibit 12



Exhibit 13



Exhibit 14

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

FORM VA

For a Work of the Visual Arts
UNITED STATES COPYRIGHT OFFICE

VAU 624-383



EFFECTIVE DATE OF REGISTRATION

9 21 04
Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

TITLE OF THIS WORK

FLOWER GROUP G

PREVIOUS OR ALTERNATIVE TITLES

K-0344, D-AD109, K0169

Publication as a Contribution. If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work

NATURE OF THIS WORK See Instructions

TEXTILE DESIGN

If published in a periodical or serial give: Volume

Number

Issue Date

On Pages

NAME OF AUTHOR

a LA PRINTEX INDUSTRIES INC.

DATES OF BIRTH AND DEATH
Year Born Year DiedWas this contribution to the work a
"work made for hire"?
☐ Yes
☒ No
Author's Nationality or Domestic
Name of Country
 OR
 Citizen of
 Domestic in

Was This Author's Contribution to the Work

 Anonymous? ☐ Yes ☒ No
 Pseudonym? ☐ Yes ☒ No
If the answer to either
of these questions is
"Yes," see detailed
instructions.

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions

☐ 3-Dimensional sculpture ☐ Map ☐ Technical drawing
☒ 2-Dimensional artwork ☐ Photograph ☐ Text
☐ Reproduction of work of art ☐ Jewelry design ☐ Architectural work

NAME OF AUTHOR

b LA PRINTEX INDUSTRIES, INC.

DATES OF BIRTH AND DEATH
Year Born Year DiedWas this contribution to the work a
"work made for hire"?
☐ Yes
☒ No
Author's Nationality or Domestic
Name of Country
 OR
 Citizen of
 Domestic in

Was This Author's Contribution to the Work

 Anonymous? ☐ Yes ☒ No
 Pseudonym? ☐ Yes ☒ No
If the answer to either
of these questions is
"Yes," see detailed
instructions.

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions

☐ 3-Dimensional sculpture ☐ Map ☐ Technical drawing
☒ 2-Dimensional artwork ☐ Photograph ☐ Text
☐ Reproduction of work of art ☐ Jewelry design ☐ Architectural work

Year in Which Creation of This Work Was

Completed 2004

This information
should be given
in all cases.

Date and Month of First Publication of This Particular Work

Complete this information
ONLY if this work
has been published.

Month Day Year

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the author in the
author given in space 2. LA PRINTEX INDUSTRIES, INC.
 8270 E. 26th St.
 VERNON, CA. 90023

APPLICATION RECEIVED

ONE DEPOSIT RECEIVED

SEP 21 2004

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

Transfer: If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a
brief statement of how the claimant(s) obtained ownership of the copyright.

MORE ON BACK

 • Complete all applicable spaces (numbers 1-4) on the reverse side of this page.
 • Print legibly and accurately.
 • Sign the form at line 5.

DO NOT WRITE HERE

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see Instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared as "author" of this part, and leave the space for dates of birth and death blank.

See Instructions before completing this form.

EXAMINED BY

FORM VA

CHECKED BY

☐ CORRESPONDENCE

Yes

FOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

☐ Yes ☐ No If your answer is "Yes," why is another registration being sought? (Check appropriate box.)a. ☐ This is the first published edition of a work previously registered in unpublished form.b. ☐ This is the first application submitted by this author as copyright claimant.c. ☐ This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number

Year of Registration

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation.

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates.

b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed.

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name

Account Number

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP

LA PRINTEX Industries, Inc.

3270 E. 26th St.

Vernon, CA 90023

ATT: MOON/OWNER

Area code and daytime telephone number

323 269-0100

Fax number 323 269-0190

Email

CERTIFICATION I, the undersigned, hereby certify that I am the

check only one

☐ author☐ other copyright claimant☐ owner of exclusive right(s)☐ authorized agent of

Name of author or other copyright claimant, or owner of exclusive right(s)

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date If this application gives a date of publication in space 3, do not sign and submit it before that date.

Moon

Date 6-9-04

Handwritten signature (X)

X

Moon

Certificate
will be
mailed in
window
envelope
to this
address:

Name

LA PRINTEX INDUSTRIES, INC.

Number/Street/Apt

3270 E. 26th St.

City/State/ZIP

VERNON, CA. 90023

* Complete all necessary spaces
* Sign your application in space 8

1. Application form

2. Nonrefundable filing fee in check or money

3. Deposit material

4. Mailing

Library of Congress

Copyright Office

101 Independence Avenue, S.E.

Washington, D.C. 20540-0000

As of July 1, 2000,
the filing fee for
Form VA is \$35.

17 U.S.C. § 504(c): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 408, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

Exhibit 15



**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Margaret M. Morrow and the assigned discovery Magistrate Judge is Patrick J. Walsh.

The case number on all documents filed with the Court should read as follows:

CV08 - 930 MMM (PJWx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

===== :
NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☒ **Western Division**
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

☐ **Southern Division**
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

☐ **Eastern Division**
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

Stephen M. Doniger, Esq. (SBN 179314)
Scott A. Burroughs, Esq. (SBN 235718)
DONIGER LAW FIRM
300 Corporate Pointe, Suite 355
Culver City, CA 90230
Telephone: (310) 590-1820

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

L.A. PRINTEX INDUSTRIES, INC., a California
Corporation,

PLAINTIFF(S)

v.

ROSS STORES, INC., a Delaware Corporation; et
al.,

[SEE ATTACHED "SCHEDULE A"]

DEFENDANT(S).

CASE NUMBER

CV08-00930 **MMM PJW**

SUMMONS

TO: THE ABOVE-NAMED DEFENDANT(S):

YOU ARE HEREBY SUMMONED and required to file with this court and serve upon plaintiff's attorney
SCOTT A. BURROUGHS, ESQ., whose address is:

DONIGER LAW FIRM APC
300 Corporate Pointe, Suite 355
Culver City, CA 90230
Telephone: (310) 590-1820
Facsimile: (310) 417-3538

an answer to the ☒ complaint ☐ _____ amended complaint ☐ counterclaim ☐ cross-claim
which is herewith served upon you within 20 days after service of this Summons upon you, exclusive
of the day of service. If you fail to do so, judgement by default will be taken against you for the relief
demanded in the complaint.

Clerk, U.S. District Court

Dated: 2/11/08

By: *H. Hernandez*
Deputy Clerk

(Seal of the Court)

“SCHEDULE A”

L.A. PRINTEX INDUSTRIES, INC., a
California Corporation

Plaintiff,

vs.

ROSS STORES, INC., a Delaware
Corporation; ALARMEX HOLDINGS
GROUP LLC, a New York Limited
Liability Company, APPAREL
HOLDINGS GROUP LLC, a New York
Limited Liability Company; UNO
CLOTHING, INC, a California
Corporation; MACKSON, INC., a New
York Corporation, INTERTEX
APPAREL, LTD., a New York
Corporation; and DOES 1 through 10,

Defendants.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/> L.A. PRINTEX INDUSTRIES, INC.		DEFENDANTS ROSS STORES, INC.; et al.	
(b) County of Residence of First Listed Plaintiff (Except in U.S. Plaintiff Cases): Los Angeles County		County of Residence of First Listed Defendant (In U.S. Plaintiff Cases Only):	
(c) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Stephen M. Doniger, Esq. (SBN 179314) Scott A. Burroughs, Esq. (SBN 235718) 300 Corporate Pointe, Suite 355 Culver City, CA 90230 Telephone: (310) 590-1820		Attorneys (If Known)	

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border: none;"> <tr> <td style="width:30%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:40%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td align="center"><input type="checkbox"/> 1</td> <td align="center"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td align="center"><input type="checkbox"/> 4</td> <td align="center"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td align="center"><input type="checkbox"/> 2</td> <td align="center"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td align="center"><input type="checkbox"/> 5</td> <td align="center"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td align="center"><input type="checkbox"/> 3</td> <td align="center"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td align="center"><input type="checkbox"/> 6</td> <td align="center"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
	PTF	DEF		PTF	DEF																				
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4																				
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5																				
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. ORIGIN (Place an X in one box only.)
☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify): ☐ 6 Multi-District Litigation ☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: ☐ Yes ☒ No

MONEY DEMANDED IN COMPLAINT: \$ _____

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 Copyright Act 17 U.S.C. § 101 - Action for misappropriation of Plaintiff's two-dimensional graphic artwork by competitors in the apparel industry.

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities /Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE / PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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VIII(a). IDENTICAL CASES: Has this action been previously filed and dismissed, remanded or closed? ☒ No ☐ Yes

If yes, list case number(s): _____

FOR OFFICE USE ONLY: Case Number: _____

2008-00930

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

VIII(b). RELATED CASES: Have any cases been previously filed that are related to the present case? ☒ No ☐ Yes

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: List the California County, or State if other than California, in which **EACH** named plaintiff resides (Use an additional sheet if necessary)

☐ Check here if the U.S. government, its agencies or employees is a named plaintiff.

L.A. PRINTEX INDUSTRIES, INC. - Los Angeles County

List the California County, or State if other than California, in which **EACH** named defendant resides. (Use an additional sheet if necessary).

☐ Check here if the U.S. government, its agencies or employees is a named defendant.

Ross Stores, Inc.: Delaware

Alarmex Holdings Group LLC/Apparel Holdings Group LLC: New York

Uno Clothing, Inc.: Los Angeles

Mackson, Inc.: New York

Intertex Apparel Ltd.: New York

List the California County, or State if other than California, in which **EACH** claim arose. (Use an additional sheet if necessary)

Note: In land condemnation cases, use the location of the tract of land involved.

Los Angeles County

X. SIGNATURE OF ATTORNEY (OR PRO PER): _____

Date 2/8/08

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))