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9 WILLIAMS-SONOMA, INC.

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

C 06 6572

JSW

12 WILLIAMS-SONOMA, INC., a California
13 corporation,

14 Plaintiff,

15 v.

16 FRIENDFINDER, INC., a corporation,
17 ONLINE MARKETING SERVICES, LTD., a
18 corporation, UNIMASTER, LTD., a
19 corporation, YETISCASH, a corporation,
20 DOMAIN NAME SYSTEMS, INC., a
21 corporation, VIRTUAL WORLD HOLDINGS
22 AVV, a corporation, MONIKER PRIVACY
23 SERVICES, INC., a corporation, ALES
24 LEXICO, JOHN SALMOND, FORD JESKE,
25 ANDREJ KORCHEV, VLADIMIR TECHL,
26 DOROTHY SIMPSON, and DOES 1
27 THROUGH 20,

28 Defendants.

Case No.

**COMPLAINT FOR FEDERAL
TRADEMARK INFRINGEMENT,
TRADEMARK DILUTION, UNFAIR
COMPETITION AND
ACCOUNTING/CONSTRUCTIVE
TRUST; AND CALIFORNIA
UNFAIR COMPETITION.**

DEMAND FOR JURY TRIAL

Plaintiff WILLIAMS-SONOMA, INC. ("WSI"), a California corporation, alleges as follows:

INTRODUCTION

1. The purpose of this lawsuit is to seek damages and injunctive relief to stop Defendants from their practice of using and infringing WSI's famous POTTERY BARN® family of trademarks to identify their explicit and graphic pornographic adult web sites. Defendants have used WSI's marks or

1 derivatives of them to divert internet traffic to their web sites, promote the sites, and add to their
2 credibility at WSI's expense. Defendants' unauthorized use of WSI's trademarks to attract consumers
3 to Defendants' prurient web sites that feature nude women and men engaged in sexual acts causes
4 incalculable harm to WSI and its marks. Unless defendants are prevented from any further
5 misappropriation of WSI's reputation and goodwill, WSI will suffer ongoing and irreparable harm.

6 THE PARTIES

7 2. WSI is a premier specialty retailer of home furnishings, including furniture, appliances
8 and accessories for kitchens, bedrooms and bathrooms, teenage, children's and baby's rooms,
9 including a full range of home furnishings, bedding, linens and accessories, under WSI's POTTERY
10 BARN®, pottery barn kids® and PBteen® marks. WSI sells nationwide through retail stores,
11 catalogs and the internet, including POTTERY BARN® and pottery barn kids® stores, and catalog
12 and internet sites under the POTTERY BARN®, pottery barn kids® and PBteen® trademarks. The
13 POTTERY BARN®, pottery barn kids® and PBteen® trademarks are among the most well known
14 and respected brands in the home furnishings business. These trademarks enjoy enormous goodwill
15 and fame among consumers. WSI is headquartered in San Francisco, California.

16 3. The Defendants include as follows:

17 a. WSI is informed and believes that defendant Online Marketing Services Ltd. is
18 a corporation and maintains a business location in the United Kingdom. Online Marketing Services
19 owns, operates and hosts graphic sex-oriented, pornographic web sites, including
20 <www.onlinemarketingservices.biz> and a variety of web sites with the extension <filthserver.com>
21 (such as <platinumporn.filthserver.com>). Online Marketing Services regularly conducts business in
22 this judicial district, including the infringing activities at issue in this Complaint. Online Marketing
23 Services is directly and indirectly responsible for the wrongful conduct alleged herein and, on
24 information and belief, has conspired with the other defendants to engage in such wrongful conduct.

25 b. WSI is informed and believes that defendant Unimaster Ltd. is a corporation
26 and maintains a business location in Kharkov, Ukraine. Unimaster Ltd. owns and operates graphic
27 sex-oriented, pornographic web sites, including a variety of web sites with the extension <just-a-
28 porn.com> (such as <pornsites.just-a-porn.com> and <bestsex.just-a-porn.com>), and <www.porn-

1 host.org>. Unimaster Ltd. regularly conducts business in this judicial district, including the infringing
2 activities at issue in this Complaint. Unimaster Ltd. is directly and indirectly responsible for the
3 wrongful conduct alleged herein and, on information and belief, has conspired with the other
4 defendants to engage in such wrongful conduct.

5 c. Defendant Andrej Korchev is an individual who, on information and belief,
6 resides in Kharkov, Ukraine. Korchev is the owner, operator, and/or managing agent of Unimaster
7 Ltd. and regularly conducts business in this judicial district, including the infringing activities at issue
8 in this Complaint. Korchev is directly and indirectly responsible for the wrongful conduct alleged
9 herein and, on information and belief, has conspired with the other defendants to engage in such
10 wrongful conduct.

11 d. WSI is informed and believes that defendant YetisCash is a corporation with a
12 business address located in the Czech Republic. YetisCash owns and operates graphic sex-oriented,
13 pornographic web sites, including a variety of web sites with the extension <sexcountry.net>.
14 YetisCash regularly conducts business in this judicial district, including the infringing activities at
15 issue in this Complaint. YetisCash is directly and indirectly responsible for the wrongful conduct
16 alleged herein and, on information and belief, has conspired with the other defendants to engage in
17 such wrongful conduct.

18 e. Defendant Ales Lexico is an individual who, on information and belief, resides
19 in the Czech Republic. Lexico is the owner, operator, and/or managing agent of YetisCash and
20 regularly conducts business in this judicial district, including the infringing activities at issue in this
21 Complaint. Lexico is directly and indirectly responsible for the wrongful conduct alleged herein and,
22 on information and belief, has conspired with the other defendants to engage in such wrongful
23 conduct.

24 f. Defendant Vladimir Techl is an individual who, on information and belief,
25 resides in the Czech Republic. Techl is the owner, operator, and/or managing agent of YetisCash and,
26 through that company, regularly conducts business in this judicial district, including the infringing
27 activities at issue in this Complaint. Techl is directly and indirectly responsible for the wrongful
28 conduct alleged herein and, on information and belief, has conspired with the other defendants to

1 engage in such wrongful conduct.

2 g. WSI is informed and believes that defendant Domain Name Systems, Inc. is a
3 corporation with a business address at 1811 Englewood Road, Englewood, Florida. Domain Name
4 Systems owns and operates graphic sex-oriented, pornographic web sites, including a variety of web
5 sites with the extension <dirtyteen.com >. Domain Name Systems regularly conducts business in this
6 judicial district, including the infringing activities at issue in this Complaint. Domain Name Systems
7 is directly and indirectly responsible for the wrongful conduct alleged herein and, on information and
8 belief, has conspired with the other defendants to engage in such wrongful conduct.

9 h. WSI is informed and believes that defendant Ford Jeske is an individual who
10 resides in or near Englewood, Florida, and owns and/or operates defendant Domain Name Systems,
11 Inc. Jeske owns and operates graphic sex-oriented, pornographic web sites, including a variety of web
12 sites with the extension <dirtyteen.com >. Jeske regularly conducts business in this judicial district,
13 including the infringing activities at issue in this Complaint. Jeske is directly and indirectly
14 responsible for the wrongful conduct alleged herein and, on information and belief, has conspired with
15 the other defendants to engage in such wrongful conduct.

16 i. WSI is informed and believes that defendant John Salmond is an individual
17 who resides in Arlington, Kansas. Salmond owns and operates graphic sex-oriented, pornographic
18 web sites, including <www.wacas.org>. Salmond regularly conducts business in this judicial district,
19 including the infringing activities at issue in this Complaint. Salmond is directly and indirectly
20 responsible for the wrongful conduct alleged herein and, on information and belief, has conspired with
21 the other defendants to engage in such wrongful conduct.

22 j. WSI is informed and believes that defendant Virtual World Holdings AVV is a
23 corporation with a business address in Willemstad, Curacao. Virtual World Holdings AVV owns and
24 operates graphic sex-oriented, pornographic web sites, including a variety of web sites with the
25 extension <realitypassplus.com >. Virtual World Holdings AVV regularly conducts business in this
26 judicial district, including the infringing activities at issue in this Complaint. Virtual World Holdings
27 is directly and indirectly responsible for the wrongful conduct alleged herein and, on information and
28 belief, has conspired with the other defendants to engage in such wrongful conduct.

1 k. Defendant FriendFinder, Inc. ("FFI"), is a corporation in this judicial district
2 with a business located at 445 Sherman Avenue, Palo Alto, California. FFI owns and operates web
3 sites offering sexually-explicit adult personal advertisements including the site
4 <www.adultfriendfinder.com>. FFI regularly conducts business in this judicial district, including the
5 wrongful activities at issue in this Complaint. FFI is directly and indirectly responsible for the
6 wrongful conduct alleged herein and, on information and belief, has conspired with the other
7 defendants to engage in such wrongful conduct.

8 l. FFI describes its web site as the "World's largest sex personals and swingers
9 site," and the site contains many millions of sexually-explicit personal ads. It is one of the more
10 highly-trafficked web sites on the worldwide web. According to one published report, FFI has more
11 than 89 million users.

12 m. FFI engineers such a high volume of consumer traffic in part through an
13 "affiliate partner" program with other adult-oriented web sites, including, on information and belief,
14 the sites operated by the other defendants. FFI pays out over \$500,000 each month to its affiliate
15 partner sites to place banner ads on the affiliate sites and to direct consumer traffic to FriendFinder,
16 Inc.'s web sites. FriendFinder, Inc. pays some of its affiliate partners more than \$30,000 each per
17 month. In addition to click-through consumer traffic from FFI advertising links on the other
18 defendants' sites, FFI also directly and indirectly uses Plaintiff's trademarks via web links that use
19 WSI's trademarks to generate high placement in internet search results and divert customers directly to
20 FFI's sites.

21 n. WSI is informed and believes that defendant Moniker Privacy Services, Inc. is a
22 corporation with a business address located in Pompano Beach, Florida. Moniker Privacy Services,
23 Inc., owns and operates graphic sex-oriented, pornographic web sites, including a variety of web sites
24 with the extension <sapphicerotica.com>. Moniker Privacy Services, Inc., regularly conducts
25 business in this judicial district, including the infringing activities at issue in this Complaint. It is
26 directly and indirectly responsible for the wrongful conduct alleged herein and, on information and
27 belief, has conspired with the other defendants to engage in such wrongful conduct.

28 o. WSI is informed and believes that defendant Dorothy Simpson is an individual

1 residing in either Maryland or Virginia. She owns and operates graphic sex-oriented, pornographic
2 web sites, including a variety of web sites with the extension <lesblife.info>. Simpson regularly
3 conducts business in this judicial district, including the infringing activities at issue in this Complaint.
4 She is directly and indirectly responsible for the wrongful conduct alleged herein and, on information
5 and belief, has conspired with the other Defendants to engage in such wrongful conduct.

6 p. WSI is informed and believes that defendant John Salmond is an individual
7 who resides in Arlington, Kansas. Salmond owns and operates graphic sex-oriented, pornographic
8 web sites, including <www.wacas.org>. Salmond regularly conducts business in this judicial district,
9 including the infringing activities at issue in this Complaint. Salmond is directly and indirectly
10 responsible for the wrongful conduct alleged herein and, on information and belief, has conspired with
11 the other defendants to engage in such wrongful conduct.

12 q. WSI alleges on information and belief that Defendants Does 1 through 20 have
13 engaged in the wrongful conduct described herein in concert with the other Defendants and are jointly
14 and severally liable for Defendants' conduct. WSI is uninformed concerning the true identities of
15 Does 1 through 20 and, once they become known, will seek to substitute them as defendants.

16 r. The web sites with addresses containing extensions <filthserver.com>, <just-a-
17 porn.com>, <sexcountry.net>, <dirtyteen.com>, <realitypassplus.com>, <wacas.org>, <porn-
18 host.org>, <onlinemarketingservices.biz>, <adultfriendfinder.com>, <lesblife.info>,
19 <sapphicerotica.com>, as well as other web sites that may be identified in the course of further
20 investigation and discovery, are referred to collectively in this Complaint as "Infringing Portals"
21 and/or "Infringing Sites."

22 JURISDICTION AND VENUE

23 4. Plaintiff's first, second and third claims arise under the Lanham Act, for which
24 jurisdiction is conferred under 28 U.S.C. § 1338(a) and (b), 28 U.S.C. § 1331 and 15 U.S.C. § 1121.
25 The Court has supplemental jurisdiction over all other claims under U.S.C. § 1367.

26 5. Venue is proper in this Court under 28 U.S.C. §§ 1391(a) and (b) because the
27 defendants transact business in this Judicial District or are headquartered here, they solicit
28 subscriptions to their adult services in this Judicial District in the course of using WSI's marks and

1 because a substantial part of the events giving rise to WSI's claims arose here.

2 6. Intradistrict assignment to any division is proper under Local Rule 3-5(b) and 3-2(c)
3 because a substantial part of the alleged events, occurred in one or more of the counties listed in Local
4 Rule 3-2(d).

5 WSI'S TRADEMARKS

6 7. The Pottery Barn business began in 1949 with a single retail store in Manhattan. The
7 business grew steadily, additional stores were opened and the business and the related trademarks
8 were acquired by WSI in 1986. After that time, the business experienced significant growth and it
9 now includes nearly 200 retail stores nationwide, plus a vibrant catalog and internet business under the
10 POTTERY BARN® brand. Many additional stores as well as catalogs and a large on-line business
11 are operated under the pottery barn kids® (since 1999) and PBteen® (since 2002) brands. WSI (or its
12 predecessor-in interest) has used the POTTERY BARN®, pottery barn kids®, PBteen® trademarks in
13 commerce continuously since each brands' inception.

14 8. WSI owns federal trademark registrations pertaining to each of these brands. Examples
15 include as follows:

16 a. THE POTTERY BARN, registration number 655819 (filed 8/02/1956,
17 registered 12/17/1957);

18 b. THE POTTERY BARN, registration number 976194 (filed 1/05/1973,
19 registered 1/08/1974);

20 c. THE POTTERY BARN, registration number 976344 (filed 1/05/1973,
21 registered 1/08/1974);

22 d. THE POTTERY BARN, registration number 959383 (filed 5/12/1972,
23 registered 5/22/1973);

24 e. POTTERY BARN, registration number 2021077 (filed 2/12/1996, registered
25 12/03/1996);

26 f. POTTERY BARN KIDS, registration number 2383910 (filed 7/16/1998,
27 registered 9/05/2000);

28 g. PBteen, registration number 2972766 (filed 8/12/2002, registered 7/19/2005);

1 and

2 h. P.B.KIDS, registration number 3076971 (filed 7/16/1998, registered
3 5/13/2003).

4 9. The sales volume, catalog recipients and web site visits under WSI's "Pottery Barn"
5 divisions are proprietary figures. It is permissible to state publicly, however, that over the last several
6 years, billions of dollars of products have been sold by WSI's "Pottery Barn" divisions.

7 **DEFENDANTS' MISAPPROPRIATION OF WSI'S TRADEMARKS.**

8 10. Beginning at a time unknown, Defendants -- separately and in concert -- began using
9 WSI's trademarks to promote, identify, and divert customer traffic to the Infringing Portals and
10 Infringing Sites. In general, one or more of the Defendants will host a web page that consists entirely
11 of banner advertisements for various web sites. Through a variety of techniques, these web portals
12 ("Infringing Portals") are identified in response to consumer searches on well known search engines
13 such as google.com and yahoo.com. Among the search terms that will generate links to the Infringing
14 Portals and Sites are "potterybarnteens," "potterybarnteen," "pottery-barn-teens" and "pottery-barn-
15 teen." WSI is informed and believes that other as-yet-undiscovered derivations of its marks also will
16 produce links to the Infringing Portals and Infringing Sites.

17 11. Defendants generate the links in response to consumer searches in a variety of ways,
18 including as follows:

19 a. Using the WSI trademark on the Infringing Portals and/or Infringing Sites. For
20 example, one Infringing Portal and Infringing Site is captioned "POTTERYBARNTEENS;
21 potterybarnteens official website!"

22 b. Embedding the term, e.g. "potterybarnteen" in source code or metadata that is
23 used to generate search priority.

24 c. Using the term, e.g. "potterybarnteens," as a domain extension.

25 d. Repeatedly using the term, e.g. "potterybarnteen," as an element of a graphic,
26 sexually explicit narrative that is interspersed with links to Infringing Portals Sites such as ". . . who
27 then removed her top revealing her braless breasts to her potterybarnteen."

28 e. Conspiring, on information and belief, with operators of the Infringing Portal

1 Sites to use WSI's in various ways to drive customer traffic to Infringing Sites.

2 f. Using other, as yet unidentified means to generate search priority using WSI's
3 marks.

4 12. As used in this Complaint, Infringing Portals and Infringing Sites are not mutually
5 exclusive as many Infringing Sites appear to offer little more than links to other adult web sites and,
6 therefore, primarily serve as Infringing Portals.

7 13. Each Defendant's Infringing Portal or Infringing Site may be reached directly by
8 clicking on search results from google.com or yahoo.com that were identified in response to search
9 terms that incorporate the term "pottery barn teen."

10 14. All of the Infringing Portals and Infringing Sites contain egregiously graphic, sex-
11 oriented images and language that are extremely offensive to many. Indeed, the images and language
12 are so debased that discretion compels that the specific content of these sites not be identified in a
13 public complaint. Reviewing the content of the offending sites themselves -- such as the content of
14 <pornsites.just-a-porn.com/potterbarnteens.html>, <www.sexcountry.net>,
15 <platinumporn.filthserver.com>, <dirtyteen.com>, <www.realitypassplus.com>, and
16 <adultfriendfinder.com> -- shows their extremely debased content. Defendants, by using WSI's
17 trademarks in connection with these web sites, are seeking to debase and pervert the wholesome image
18 of the "Pottery Barn" family of marks for Defendants' salacious purposes.

19 15. WSI is informed and believes that Defendants are using WSI's trademarks deliberately
20 and intentionally in order to drive consumers to their websites and banner advertisements and to
21 capture and trade upon the goodwill and reputation of WSI and its famous "Pottery Barn" brands.
22 WSI is informed and believes that each Defendant knows that Infringing Portals displaying banner ads
23 for and links to their Infringing Sites are misappropriating WSI's trademarks (and other well known
24 trademarks) to attract consumer traffic.

25 16. Not surprisingly, consumers have complained to WSI that, when searching for WSI's
26 websites using common search terms incorporating WSI's marks, they have been directed to
27 Defendants' offensive porn sites.

28

FIRST CLAIM
(Trademark Infringement - Lanham Act)

17. WSI incorporates the allegations of paragraphs 1 - 16 as if each were fully set forth here.

18. WSI's trademarks are strong, inherently distinctive and arbitrary.

19. Through extensive use, WSI's Pottery Barn® family of trademarks has become secondarily associated by consumers with WSI and its brands.

20. Defendants' illicit use of WSI's trademarks and derivatives of them are likely to create consumer confusion and constitutes trademark infringement under the Federal Lanham Act, 15 U.S.C. §§ 1114 and 1125(a).

21. Defendants adopted WSI's trademarks willfully and in bad faith in order to appropriate WSI's goodwill. WSI is entitled to compensatory damages in the form of actual damages, Defendants' profits resulting from the infringing acts, treble damages, and an award of attorneys' fees under 15 U.S.C. §§ 1117(a) and (b).

22. The specific acts of trademark infringement identified above, as well as Defendants' entire course of conduct, have caused and are causing WSI great and incalculable damage. Defendants threaten to continue infringing WSI's trademarks and, unless this Court restrains them, WSI will suffer irreparable injury for which it has no adequate remedy of law.

SECOND CLAIM
FEDERAL UNFAIR COMPETITION
(False Designation of Origin and False Description)
(15 U.S.C. § 1125; Lanham Act § 43(a))

23. WSI realleges and incorporates by reference each of the allegations contained in paragraphs 1 through 22 of this Complaint.

24. Defendants' use of "potterybarnteens" or similar variants tends falsely to describe its infringing services, within the meaning of 15 U.S.C. § 1125(a)(1). Defendants' conduct is likely to cause confusion, mistake, or deception by or in the public as to the affiliation, connection, association, origin, sponsorship or approval of the infringing services to the detriment of WSI and in violation of 15 U.S.C. § 1125(a)(1).

1 unauthorized and illicit use of Plaintiff's marks. Defendants knowingly induce the infringement of
2 WSI's trademarks by offering advertising and other revenue in order to drive high volumes of
3 customer traffic to the Infringing Sites.

4 34. Defendants directly benefit from the Infringing Portals' infringement of Plaintiff's
5 trademarks because such infringement directly increases the volume of customer traffic to the
6 Infringing Sites and results in Defendants' increased business from such customers.

7 35. Some Defendants, WSI is informed and believes, enter formal written contracts with
8 the Infringing Sites, establishing them as formal affiliates. These contracts grant Defendants the right
9 to monitor and control unlawful content on the Infringing Portals and Infringing Sites, including the
10 right to monitor and control their trademark violations.

11 36. By providing the Infringing Portals and Sites with money, advertising links, and
12 connections to an extensive network of advertisers on the worldwide web, Defendants substantially
13 support and contribute to the infringement of Plaintiff's trademarks.

14
15 **FIFTH CLAIM**
16 **EQUITABLE ACCOUNTING/CONSTRUCTIVE TRUST**
(15 U.S.C. 1117, Common Law)

17 37. The allegations of paragraphs 1 through 36 are incorporated by reference as if each
18 were fully set forth here.

19 38. Defendants wrongfully and intentionally have used WSI's trademarks to create
20 economic value in the domain names of the Infringing Portals and Infringing Sites. One way to
21 measure such economic value is through the high volume of computer user traffic that visits the
22 Infringing Portals and Infringing Sites.

23 39. In addition, Defendants' intentional, wrongful conduct has generated substantial sums
24 of money through advertising revenues, customer payments, subscription fees, and other forms of
25 payment, and such payments are directly attributable to Defendants' illicit use of WSI's trademarks
26 and their having traded on the reputation of WSI's brands. Such assets -- the domain names of the
27 Infringing Portals and Sites and the revenues generated for Defendants -- constitute assets which could
28 be used to satisfy an equitable award.

1 this Complaint;

2 (3) Order that, during the pendency of this Action, all the domain names associated with
3 the Infringing Portals and/or Infringing Sites be seized, sequestered, or frozen and that any sale or
4 transfer of the domain names be prohibited;

5 (4) Order that WSI recover from Defendants for their trademark infringement and dilution
6 WSI's actual damages and lost profits in an amount to be proven at trial, that Defendants be required
7 to account for any profits that are attributable to their illegal acts, and that WSI be awarded the greater
8 of either three times Defendants' profits or three times any damages it has sustained, under 15 U.S.C.
9 §1117, plus prejudgment interest;

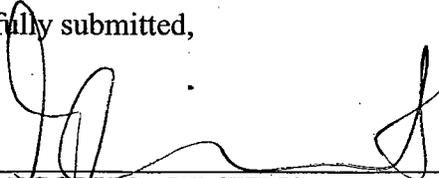
10 (5) Order that Defendants cease all use of any domain name or web site that contains the
11 term "pottery barn" or any derivative or similar term pending full compliance with this injunction and,
12 if necessary, Order that the third parties with control over the registration of such domain names
13 deposit documents with the Court to establish the Court's control over the domain names, cancel any
14 domain names whose owners are not in compliance with such injunction, and prohibit reacquisition by
15 such Defendants, or the agents, of any such domain names;

16 (6) Order that Defendants pay all of WSI's costs of suit, including its reasonable attorneys'
17 fees; and

18 (7) Award WSI such other and further preliminary and permanent relief as is just and
19 equitable.

20
21 DATED: October 20, 2006

Respectfully submitted,

22
23 By: 

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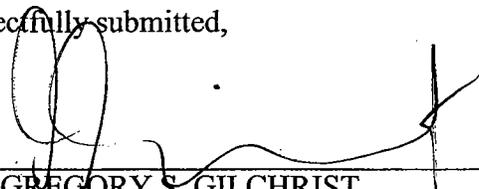
Attorneys for Plaintiff
WILLIAMS-SONOMA, INC.

DEMAND FOR JURY TRIAL

Plaintiff WILLIAMS-SONOMA, INC. hereby demands that this action be tried to a jury.

DATED: October 20, 2006

Respectfully submitted,

By: 

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