

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TRUE RELIGION APPAREL, INC.; GURU DENIM,
INC.,

Plaintiffs,

v.

XIAOKANG LEI D/B/A
TRUERELIGIONJEANS4OUTLET.COM; LIN JIANYU
D/B/A TRUERELIGIONJEANSOUTLET8.COM; ZHAO
YANG QU D/B/A TRUERELIGION2CHEAP.COM;
RONGLIAN LU D/B/A/ TOPTRJEANS.COM;
FORTRUERELIGIONJEANS.COM D/B/A
FASHIONJEANSHOP@GMAIL.COM; XIN JIE KOU
D/B/A TRUERELIGIONSALE.CO.UK; JIAQIAO LV
D/B/A TRUERELIGION2CHEAP.COM; ZHAO YANG
QU D/B/A TRUERELIGION2CHEAP.COM;
WANGMING D/B/A JEANSWHOLESALING.COM;
SERVICE@TRUERELIGIONLIKE.COM D/B/A
OBCS001@HOTMAIL.COM D/B/A
TRUERELIGIONLIKE.COM;
CHEAPERTRUERELIGIONJEANS.NET D/B/A
JACKROSEGATES@GMAIL.COM; XIAOYU CHEN
D/B/A SH12345602@HOTMAIL.COM D/B/A
CHEAPTRUERELIGIONJEANSOUTLETS.COM; LUCY
KING D/B/A LUCYKING88@YAHOO.COM D/B/A
MYFASHIONJEANS.COM; TOM SMITH D/B/A
KICKSONFOOT@GMAIL.COM D/B/A
BUYTRUERELIGIONJEANS.NET D/B/A
QIQUWANG.NET; QIN KE D/B/A
CHEAPTRUERELIGIONJEANS@HOTMAIL.COM
D/B/A MRSHUANG123@HOTMAIL.COM; TAN JUN
D/B/A WORLD203@HOTMAIL.COM D/B/A
BTWGOLD4@HOTMAIL.COM; JINGSHUN HUANG
D/B/A HAOTIAN INTERNATIONAL INDUSTRIAL
CO., LTD. D/B/A NIKECOOL.COM; CHEN JINSHAN
D/B/A HONG KONG TIMES SQUARE TRADING CO.,
LTD. D/B/A V9MAIL.COM; CHEN ZHIFENG D/B/A
ZHIF_CHEN@163.COM D/B/A HONG KONG JAVON
TRADE LTD. D/B/A TINRUI.COM; LI FENGNIAN
D/B/A FENG08183@SOHU.COM D/B/A CHEAP SKYS
CO. LTD. D/B/A CHEAP-SKYS.COM; SHOES-GOOGLE
CO., LTD. D/B/A GOTRADINGZONE.COM D/B/A
GOTRADINGZONE@HOTMAIL.COM; GUOFANG

CIVIL ACTION NO. _____

COMPLAINT

**[FILED UNDER SEAL
PURSUANT TO 15 U.S.C. § 1116]**

XIAO D/B/A EMAIL598269039@QQ.COM D/B/A
TONGHE TRADE CO., LTD. D/B/A
THE9THSTREET.COM; BRANDSTRIBE CO., LTD.
D/B/A BRANDSTRIBE.COM D/B/A
ALICEWENNE@HOTMAIL.COM D/B/A
SALES@BRANDSTRIBE.COM D/B/A
BRANDSTRIBE@HOTMAIL.COM D/B/A
BRANDSTRIBEINFO@YAHOO.COM; XUBEICHAO
D/B/A TRADEMEMOMENT CO. LTD. D/B/A
TRADEMOMENT.COM; YEMAO D/B/A SHUNYUAN
INTERNATIONAL EXPORT CO. D/B/A
TRADE88N.COM D/B/A
TRADE88CN@HOTMAIL.COM; WANG FOYUN D/B/A
FASHIONCHOOSE TRADE CO., LTD. D/B/A
FASHIONCHOOSE.COM D/B/A
WYZSHOES@HOTMAIL.COM; WWW.BESTKF.COM
D/B/A WZJ886@LIVE.CN D/B/A
WUQIUPING2004@163.CN; CHENZHONG D/B/A
FASHION TRADING COMPANY D/B/A
FASHION2011STORE.COM D/B/A
ZOU1973@HOTMAIL.COM; ALLEN IEE D/B/A CHEER
TRADE COMPANY D/B/A CHEERWHOLESALE.COM;
LIN HAO D/B/A HONG KONG FAIRY
INTERNATIONAL, LTD. D/B/A MORIVER-
TRADE.COM D/B/A MOONRIVER-
TRADE@HOTMAIL.COM; XIAO XU D/B/A
TRADEVOID SHOES TRADING CO., LTD. D/B/A
TRADEVOID.COM; HUANG JINFENG D/B/A HAPPY
SPORTS INDUSTRY CO., LTD. D/B/A
PENGFAHSHOES.COM; WEI JIANGGUANG
D/B/A CHINARG002@126.COM D/B/A LONGFENG
INDUSTRY CO., LTD. D/B/A
LONGFENGTRADE.COM; XIAOFANG NI D/B/A WIWI
TRADE CO., LTD. D/B/A WIWITRADE.COM D/B/A
WIWITRADE@HOTMAIL.COM; CHEN ZIU SONG
D/B/A LRGJEANS008@HOTMAIL.COM D/B/A
JERSEY TRADE CO. LTD. D/B/A
AAANBAJERSEY.COM; HONEST99896 D/B/A
DAJIAHAO662009@HOTMAIL.COM;
FERSHOUHELLO D/B/A
XUHUAN0123@YAHOO.COM.CN; ZHAOMIN8898
D/B/A ZHAOMIN82@YAHOO.COM; TUNIAN1 D/B/A
402590112@QQ.COM; LINA669925 D/B/A
YANGYINGHUI0123@YAHOO.COM.CN; AND
TRUEYES85 D/B/A LYGANG2010@YAHOO.COM.CN,

XYZ COMPANIES, AND JOHN AND JANE DOES,

Defendants.

Plaintiffs TRUE RELIGION APPAREL, INC. and GURU DENIM, INC. (collectively, “True Religion” or “Plaintiffs”) hereby file this Complaint for *inter alia* trademark counterfeiting, cybersquatting, copyright infringement and related claims against Defendants XIAOKANG LEI d/b/a TRUERELIGIONJEANS4OUTLET.COM; LIN JIANYU d/b/a TRUERELIGIONJEANSOUTLET8.COM; ZHAO YANG QU d/b/a TRUERELIGION2CHEAP.COM; RONGLIAN LU d/b/a TOPTRJEANS.COM; FORTRUERELIGIONJEANS.COM d/b/a FASHIONJEANSHOP@GMAIL.COM; XIN JIE KOU d/b/a TRUERELIGIONSALE.CO.UK; JIAQIAO LV d/b/a TRUERELIGION2CHEAP.COM; ZHAO YANG QU d/b/a TRUERELIGION2CHEAP.COM; WANGMING d/b/a JEANSWHOLESALE.COM; SERVICE@TRUERELIGIONLIKE.COM d/b/a OBCS001@HOTMAIL.COM d/b/a TRUERELIGIONLIKE.COM; CHEAPERTRUERELIGIONJEANS.NET d/b/a JACKROSEGATES@GMAIL.COM; XIAOYU CHEN d/b/a SH12345602@HOTMAIL.COM d/b/a CHEAPTRUERELIGIONJEANSOUTLETS.COM; LUCY KING d/b/a LUCYKING88@YAHOO.COM d/b/a MYFASHIONJEANS.COM; TOM SMITH d/b/a KICKSONFOOT@GMAIL.COM d/b/a BUYTRUERELIGIONJEANS.NET d/b/a QIQUWANG.NET; QIN KE d/b/a CHEAPTRUERELIGIONJEANSSALE@HOTMAIL.COM d/b/a MRSHUANG123@HOTMAIL.COM; TAN JUN d/b/a WORLD203@HOTMAIL.COM d/b/a BTWGOLD4@HOTMAIL.COM; JINGSHUN HUANG d/b/a HAOTIAN INTERNATIONAL INDUSTRIAL CO., LTD. d/b/a NIKECOOL.COM; CHEN JINSHAN d/b/a HONG KONG TIMES SQUARE TRADING CO., LTD. d/b/a V9MAIL.COM; CHEN

ZHIFENG d/b/a ZHIF_CHEN@163.COM d/b/a HONG KONG JAVON TRADE LTD. d/b/a
TINRUI.COM; LI FENGNIAN D/B/A FENG08183@SOHU.COM D/B/A CHEAP SKYS CO.
LTD. d/b/a CHEAP-SKYS.COM; SHOES-GOOGLE CO., LTD. d/b/a
GOTRADINGZONE.COM d/b/a GOTRADINGZONE@HOTMAIL.COM; GUOFANG XIAO
d/b/a EMAIL598269039@QQ.COM d/b/a TONGHE TRADE CO., LTD. d/b/a
THE9THSTREET.COM; BRANDSTRIBE CO., LTD. d/b/a BRANDSTRIBE.COM d/b/a
ALICEWENNE@HOTMAIL.COM D/B/A SALES@BRANDSTRIBE.COM d/b/a
BRANDSTRIBE@HOTMAIL.COM D/B/A BRANDSTRIBEINFO@YAHOO.COM;
XUBEICHAO d/b/a TRADEMEMOMENT CO. LTD. d/b/a TRADEMOMENT.COM; YEMAO
d/b/a SHUNYUAN INTERNATIONAL EXPORT CO. d/b/a TRADE88N.COM d/b/a
TRADE88CN@HOTMAIL.COM; WANG FOYUN D/B/A FASHIONCHOOSE TRADE CO.,
LTD. d/b/a FASHIONCHOOSE.COM d/b/a WYZSHOES@HOTMAIL.COM;
WWW.BESTKF.COM d/b/a WZJ886@LIVE.CN d/b/a WUQIUPING2004@163.CN;
CHENZHONG d/b/a FASHION TRADING COMPANY d/b/a FASHION2011STORE.COM
D/B/A ZOU1973@HOTMAIL.COM; ALLEN IEE d/b/a CHEER TRADE COMPANY d/b/a
CHEERWHOLESALE.COM; LIN HAO d/b/a HONG KONG FAIRY INTERNATIONAL,
LTD. d/b/a MORIVER-TRADE.COM d/b/a MOONRIVER-TRADE@HOTMAIL.COM; XIAO
XU d/b/a TRADEVOID SHOES TRADING CO., LTD. d/b/a TRADEVOID.COM; HUANG
JINFENG d/b/a HAPPY SPORTS INDUSTRY CO., LTD. d/b/a
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LONGFENG INDUSTRY CO., LTD. d/b/a LONGFENGTRADE.COM; XIAOFANG NI d/b/a
WIWI TRADE CO., LTD. d/b/a WIWITRADE.COM d/b/a WIWITRADE@HOTMAIL.COM;
CHEN ZIU SONG D/B/A LRGJEANS008@HOTMAIL.COM d/b/a JERSEY TRADE CO.

LTD. d/b/a AAANBAJERSEY.COM; HONEST99896 d/b/a
DAJIAHAO662009@HOTMAIL.COM; FERSHOUHELLO d/b/a
XUHUAN0123@YAHOO.COM.CN; ZHAOMIN8898 d/b/a ZHAOMIN82@YAHOO.COM;
TUNIAN1 d/b/a 402590112@QQ.COM; LINA669925 d/b/a
YANGYINGHUI0123@YAHOO.COM.CN; AND TRUEYES85 d/b/a
LYGANG2010@YAHOO.COM.CN, XYZ COMPANIES, AND JOHN AND JANE DOES
(collectively, "Defendants"), on personal knowledge as to Plaintiffs' own activities and on
information and belief as to the activities of others:

THE PARTIES

1. Plaintiff TRUE RELIGION APPAREL, INC. is a corporation duly organized and existing under the laws of the State of California with its principal place of business at 2263 E. Vernon Avenue, Vernon, California 90058.
2. Plaintiff GURU DENIM, INC. is a corporation duly organized and existing under the laws of the State of California with its principal place of business at 2263 E. Vernon Avenue, Vernon, California 90058. GURU DENIM, INC. is a wholly-owned subsidiary of TRUE RELIGION APPAREL, INC.
3. Defendant Xiaokang Lei d/b/a truereligionjeans4outlet.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.
4. Defendant Lin Jianyu d/b/a truereligionjeansoutlet8.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.
5. Defendant Zhao Yang Qu d/b/a truereligion2cheap.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

6. Defendant Ronglian Lu d/b/a toptrjeans.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

7. Defendant fortruereigionjeans.com d/b/a fashionjeanshop@gmail.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

8. Defendant Xin Jie Kou d/b/a truereligionale.co.uk is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

9. Defendant Jiaqiao Lv d/b/a truereligion2cheap.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

10. Defendant Zhao Yang Qu d/b/a truereligion2cheap.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

11. Defendant WangMing d/b/a jeanswholesaling.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

12. Defendant service@truereigionlike.com d/b/a obcs001@hotmail.com d/b/a truereligionlike.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

13. Defendant cheapertruereigionjeans.net d/b/a jackrosegates@gmail.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

14. Defendant Xiaoyu Chen d/b/a sh12345602@hotmail.com d/b/a cheaptruereigionjeansoutlets.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

15. Defendant Lucy King d/b/a lucyking88@yahoo.com d/b/a myfashionjeans.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

16. Defendant Tom Smith d/b/a kicksonfoot@gmail.com d/b/a buytruereligionjeans.net d/b/a qiquwang.net is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

17. Defendant Qin Ke d/b/a cheaptruereligionjeanssale@hotmail.com d/b/a mrshuang123@hotmail.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

18. Defendant Tan Jun d/b/a world203@hotmail.com d/b/a btwgold@@hotmail.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

19. Defendant Jingshun Huang d/b/a Haotian International Industrial Co., Ltd. d/b/a nikecool.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

20. Defendant Chen Jinshan d/b/a Hong Kong Times Square Trading Co., Ltd. d/b/a v9mail.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

21. Defendant Chen Zhifeng d/b/a zhif_chen@163.com d/b/a Hong Kong Javon Trade Ltd. d/b/a tinrui.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

22. Defendant Li FengNian d/b/a Feng08183@sohu.com d/b/a Cheap Skys Co. Ltd. d/b/a cheap-skys.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

23. Defendant Shoes-Google Co., Ltd. d/b/a gotradingzone.com d/b/a gotradingzone@hotmail.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

24. Defendant Guofang Xiao d/b/a email598269039@qq.com d/b/a TongHe Trade Co., Ltd. d/b/a the9thstreet.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

25. Defendant Brandstribе Co., Ltd. d/b/a brandstribе.com d/b/a alicewenne@hotmail.com d/b/a sales@brandstribе.com d/b/a brandstribе@hotmail.com d/b/a brandstribеinfo@yahoo.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

26. Defendant Xubeichao d/b/a Tradememoment Co. Ltd. d/b/a trademoment.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

27. Defendant Yemao d/b/a Shunyuan International Export Co. d/b/a trade88n.com d/b/a trade88cn@hotmail.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

28. Defendant Wang Foyun d/b/a Fashionchoose Trade Co., Ltd. d/b/a fashionchoose.com d/b/a wyzshoes@hotmail.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

29. Defendant www.bestkf.com d/b/a wzj886@live.cn d/b/a wuqiuping2004@163.cn is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

30. Defendant Chenzhong d/b/a Fashion Trading Company d/b/a fashion2011store.com d/b/a zou1973@hotmail.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

31. Defendant Allen Iee d/b/a Cheer Trade Company d/b/a cheerwholesale.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

32. Defendant Lin Hao d/b/a Hong Kong Fairy International, Ltd. d/b/a moriver-trade.com d/b/a moonriver-trade@hotmail.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

33. Defendant Xiao Xu d/b/a Tradevoid Shoes Trading Co., Ltd. d/b/a tradevoid.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

34. Defendant Huang Jinfeng d/b/a Happy Sports Industry Co., Ltd. d/b/a pengfashionshoes.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

35. Defendant Wei Jiangguang d/b/a chinarg002@126.com d/b/a LongFeng Industry Co. Ltd. d/b/a longfengtrade.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

36. Defendant Xiaofang Ni d/b/a WiWi Trade Co., Ltd. d/b/a wiwitrade.com d/b/a wiwitrade@hotmail.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

37. Defendant Chen Ziu Song d/b/a JIrgjeans008@hotmail.com d/b/a Jersey Trade Co. Ltd. d/b/a aanbajersey.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

38. Defendant honest99896 d/b/a dajiahao662009@hotmail.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

39. Defendant fershohello d/b/a xuhuan0123@yahoo.com.cn is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

40. Defendant zhaomin8898 d/b/a zhaomin82@yahoo.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

41. Defendant tunian1 d/b/a 402590112@qq.com is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

42. Defendant lina669925 d/b/a yangyinghui0123@yahoo.com.cn is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

43. Defendant trueyes85 d/b/a lygang2010@yahoo.com.cn is a business or an individual whose actual name is currently unconfirmed and true address currently unknown.

44. The preceding named Defendants are acting in conjunction with various Defendant XYZ Companies, John Does and Jane Does whose identities are not presently known (hereinafter, collectively referred to as "Defendants"). If Defendants' identities become known, the Complaint herein will be amended to include such names of these individuals and corporations.

JURISDICTION AND VENUE

45. This is an action for trademark counterfeiting and trademark infringement, cybersquatting and unfair competition and false designation of origin arising under the Trademark Act of 1946, 15 U.S.C. §§ 1051, *et seq.*, as amended by the Trademark Counterfeiting Act of 1984, Public Law 98-473 (October 12, 1984), the Anticybersquatting Consumer Protection Act of 1996, Pub. L. 104-153 (July 2, 1996), and the Prioritizing Resources and Organization for Intellectual Property Act of 2007, H.R. 4279 (October 13, 2008) (the “Lanham Act”); for design patent infringement under 35 U.S.C. §§ 271, *et seq.*, for copyright infringement in violation of the Copyright Act, 17 U.S.C. §§ 501, 17 U.S.C. § 106, *et seq.*; and for unlawful and deceptive acts and practices under the laws of the State of New York.

46. This Court has original jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1332 and 1338(a) and (b); 15 U.S.C. §§ 1116, 1121; 35 U.S.C. § 271; 17 U.S.C. §§106, 501 and 15 U.S.C. § 1125(a). This Court has jurisdiction, pursuant to the principles of supplemental jurisdiction and 28 U.S.C. § 1367, over Plaintiffs’ claims for unlawful and deceptive acts and practices under the laws of the State of New York because these claims form part of the same case or controversy as the claims for trademark infringement.

47. This Court has personal jurisdiction over Defendants in that each Defendant transacts business in the State of New York and in this Judicial District. This Court has personal jurisdiction over each Defendant pursuant to N.Y.C.P.L.R. § 301. By continuously soliciting business from New York residents on the Internet through one or more fully interactive web sites, accepting payment from New York residents, and by delivering counterfeit goods to residents of New York, each Defendant has transacted business in New York and interstate commerce and has wrongfully caused True Religion substantial injury in the State of New York.

48. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391 and 1400(a) in that the Defendants are entities or individuals subject to personal jurisdiction in this District. Further, venue is appropriate since a substantial portion of the acts complained of herein were committed by Defendants within this District.

BACKGROUND FACTS

TRUE RELIGION BRAND AND INTELLECTUAL PROPERTY

49. True Religion is a leading designer of popular, high-quality, designer goods, including jeanswear, sportswear, accessories and other products under the trademark and trade name TRUE RELIGION, which it displays prominently on all of its products (the “True Religion Products”).

50. The TRUE RELIGION Brand was founded in 2002, by entrepreneur Jeffrey Lubell when he sought to redefine the premium denim category. Mr. Lubell’s vision was to make quality, American-made, authentic, timeless, great fitting, 1970s inspired jeans wear, with a trendsetting appeal for today’s consumer. Today, True Religion is known not only for its premium jeanswear, but also for its knit and woven sportswear, such as t-shirts, western shirts, sweatshirts and sweatpants that all have a vintage feel. Mr. Lubell currently serves as True Religion’s Chief Executive Officer (CEO) and Chairman of the Board of Directors.

51. Among the most well-known and popular of the True Religion Products are its iconic True Religion brand jeans bearing True Religion’s famous logo (the “True Religion Design Label”):



52. True Religion Products have become known for their distinctive styles and high-quality materials and workmanship. True Religion Products are regularly the subject of much unsolicited, laudatory press coverage in various media, including editorial coverage in fashion and lifestyle magazines such as *Vanity Fair*, *People*, *Lucky*, *US Weekly*, *Nylon*, *Women's Wear Daily*, *Vogue*, and *In Style* in addition to numerous magazines in several other countries worldwide.

53. Genuine True Religion jeanswear and many of the other True Religion Products are manufactured in the United States.




54. True Religion maintains strict quality control standards for all of its True Religion Products. Genuine True Religion Products are inspected and approved by True Religion or its agents prior to distribution and sale.

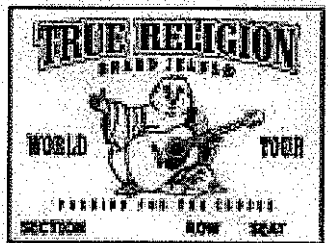
55. Genuine True Religion Products are distributed in over one hundred (100) True Religion owned boutiques in the United States, as well as internationally in True Religion boutiques located in Canada, Japan, Germany and the United Kingdom and through True Religion's Internet web store located at www.truereligionbrandjeans.com (the "True Religion Web Store"), which it launched in 2003. Genuine True Religion Products are also distributed through a worldwide network of authorized licensees, distributors, and retailers, including high-end department stores such as Neiman Marcus, Nordstrom, Saks Fifth Avenue and Bloomingdale's and numerous high-end specialty boutiques.

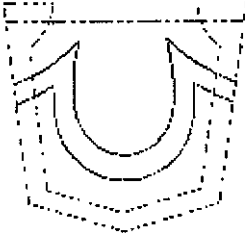
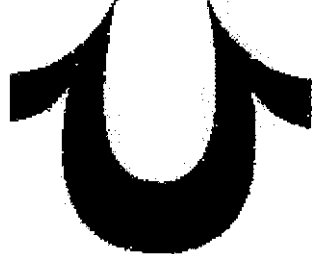

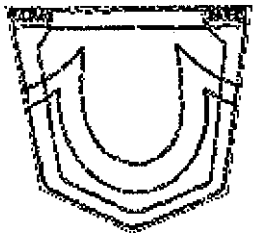
56. The True Religion Web Store features True Religion's proprietary images and designs, including images of the True Religion Products. True Religion has devoted and continues to devote a great deal of time and resources to creating these images and designs as part of its seasonal ad campaigns and to maintaining its True Religion Web Store. The True

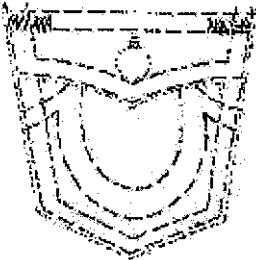
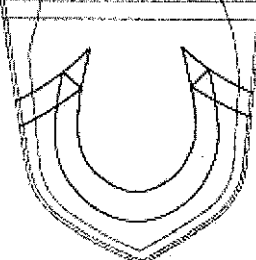
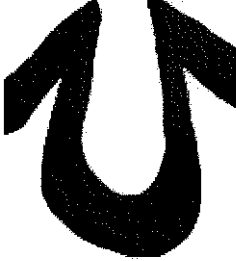

Religion Web Store features music, video, and regular updates from True Religion's Facebook page (which is "Liked" by over 520,000 fans) and Twitter feed (which is "Followed" by more than 11,000 fans). The True Religion Web Store is extremely popular, enjoying more than 500,000 unique visitors per month. A significant portion of True Religion's sales of True Religion Products are made on the True Religion Web Store.


57. True Religion is the owner of a well-established family of famous trademarks,

including, *inter alia*, TRUE RELIGION, ,  and  (collectively, the "TRUE RELIGION Marks"), for use with its collection of jeanswear, sportswear, accessories and other products and services. True Religion has developed in the TRUE RELIGION Marks, True Religion is the owner of numerous federal trademark and service mark registrations with the U.S. Patent and Trademark Office for the TRUE RELIGION Marks, including, *inter alia*, the following federal registrations:

Registration Number	Trademark	Goods and Services
2,917,187		LABEL FOR CLOTHING, NAMELY, MEN'S, WOMEN'S, AND CHILDREN'S PANTS, SLACKS, JEANS, SHORTS, OVERALLS, SHIRTS, T-SHIRTS, BLOUSES, VESTS, SKIRTS, JACKETS, SWEATERS, SWEATSHIRTS, SWEATPANTS, AND HATS, CLASS 25.

Registration Number	Trademark	Goods and Services
3,162,615	TRUE RELIGION	ON-LINE RETAIL STORE SERVICES FEATURING CLOTHING; RETAIL STORE SERVICES FEATURING CLOTHING, CLASS 35.
3,120,798	TRUE RELIGION BRAND JEANS	ON-LINE RETAIL STORE SERVICES FEATURING CLOTHING; RETAIL STORE SERVICES FEATURING CLOTHING, CLASS 35.
3,147,244		PANTS, JEANS, JACKETS, SHORTS AND SKIRTS, CLASS 25.
3,482,001		CLOTHING, NAMELY, MEN'S, WOMEN'S, AND CHILDREN'S PANTS, JEANS, SHORTS, OVERALLS, SHIRTS, T-SHIRTS, BLOUSES, VESTS, SKIRTS, JACKETS, COATS, SWEATERS, SWEATSHIRTS, SWEATPANTS, HATS, BELTS AND SHOES, CLASS 25.
3,490,283		PANTS, JEANS, SHORTS, OVERALLS, SHIRTS, T-SHIRTS, VESTS, SKIRTS, JACKETS, SWEATSHIRTS, SWEATPANTS, DRESSES, HOODED SWEATSHIRTS, TOPS, BLOUSES AND FOOTWEAR, CLASS 25.
3,561,465		PANTS, JEANS, CLASS 25.

Registration Number	Trademark	Goods and Services
3,561,466		PANTS, JEANS AND JACKETS AND SHORTS, CLASS 25.
3,561,705		APPAREL, NAMELY, JEANS, PANTS, SKIRTS, SHORTS, JACKETS, CLASS 25.
3,561,710		APPAREL, NAMELY, JEANS, PANTS, SKIRTS, SHORTS, HATS, FOOTWEAR, CLASS 25.
3,607,799		BATHING SUITS, BATHING TRUNKS, BEACHWEAR, BIKINIS, BLOUSES, BOOTS, CAPS, COATS, DRESSES, FOOTWEAR, HATS, HEADWEAR, JACKETS, JEANS, NECKWEAR, PANTS, SANDALS, SCARVES, SHAWLS, SHIRTS, SHOES, SHORTS, SKIRTS, SNEAKERS, SWEAT PANTS, SWEATSHIRTS, SWIMWEAR, T-SHIRTS, TOPS, TANK TOPS, VESTS, CLASS 25.

Registration Number	Trademark	Goods and Services
3,978,250		ADVERTISING VIA ELECTRONIC MEDIA AND SPECIFICALLY THE INTERNET; ON-LINE RETAIL STORE SERVICES FEATURING APPAREL, FOOTWEAR AND FASHION ACCESSORIES; WHOLESALE AND RETAIL STORE SERVICES FEATURING APPAREL, FOOTWEAR AND FASHION ACCESSORIES, CLASS 35.

All of the registrations listed above are valid, subsisting, unrevoked and uncanceled. True Religion also owns common law rights in these and other marks. True and correct copies of the federal trademark registrations for the TRUE RELIGION Marks are attached hereto as **Exhibit A**.

58. True Religion has used and is currently using the TRUE RELIGION Marks and Designs in commerce on or in connection with its sale of True Religion Products, and plans to continue such use in the future.

59. True Religion prominently displays the TRUE RELIGION Marks in its advertising and promotional materials. True Religion has spent substantial amounts in advertising and promoting the TRUE RELIGION Marks and True Religion Products. The continuous and broad use of the TRUE RELIGION Marks in connection with True Religion Products has enabled True Religion to achieve widespread fame, and has made the TRUE RELIGION Marks themselves among the most famous and widely-recognized marks in the fashion industry.

60. Consumers, potential consumers and other members of the public not only associate True Religion Products with exceptional materials, style and workmanship, but also

recognize that True Religion Products originate exclusively with True Religion. Consequently, True Religion has acquired and enjoys an outstanding reputation and significant goodwill associated with the TRUE RELIGION Marks on the True Religion Products.

61. In addition to the TRUE RELIGION Marks, True Religion owns copyright in numerous original visual arts and text works, many of which have been registered with the United States Copyright Office. The TRUE RELIGION Design Label, subject of federal trademark Registration 2,917,187 also constitutes copyrightable subject matter and has been registered with the United States Copyright Office, which issued its Certificate of Registration on or about February 5, 2009 (Copyright Reg. No. VA 1,698,310). The TRUE RELIGION Design Label was created by Jeffrey Lubell in 2002, who assigned the entire right in and to the work to True Religion. In addition, True Religion has applied for and received Certificates of Registration with the United States Copyright Office (Copyright Reg. Nos. TX 6,236,806 and TX 7,243,590) for the True Religion Web Store., including proprietary text, images and layout. (collectively, with the True Religion Design Label, the "True Religion Copyrights") True and correct records of these copyright registrations with the United States Copyright Office are attached hereto as **Exhibit B**.

62. True Religion is also the owner of the entire right, title and interest in and to four (4) separate United States Design Patents: (1) Design Patent Number D547,530 for the ornamental stitch pattern applied to jeanswear, sportswear, accessories, or other products registered with the USPTO on or about July 31, 2007, (2) Design Patent Number D620,687 for pants with double stitching registered with the USPTO on or about August 3, 2010, (3) Design Patent Number 620,684 for bottom garment with double stitching registered with the USPTO on or about August 3, 2010, and (4) Design Patent Number D620,685 for bottom garment back with

double stitching registered with the USPTO on or about August 3, 2010 (collectively, the “True Religion Design Patents.”) All of the foregoing patents constitute patentable subject matter. Each of the foregoing was invented by Jeffrey Lubell, who assigned the entire right in and to each patent to True Religion. True and correct copies of the registrations for the foregoing design patents are attached hereto as **Exhibit C**.

63. The TRUE RELIGION Marks, True Religion Copyrights and True Religion Design Patents are thus invaluable assets to True Religion.

DEFENDANTS’ UNLAWFUL ACTS

64. Defendants are an interrelated group of counterfeiters knowingly and willfully manufacturing, importing, distributing, offering for sale and selling products designed to look like genuine True Religion Products bearing counterfeits of the TRUE RELIGION Marks (“Counterfeit Products”). The Counterfeit Products also infringe True Religion’s copyright in its the True Religion Design Label as well as the True Religion Design Patents.

65. Defendants, without any authorization from True Religion, are knowingly and willfully using the TRUE RELIGION Marks in connection with the advertisement, offer for sale and sale of the Counterfeit Products on the Internet, including, on dozens of ‘rogue’ web sites and selling pages on business-to-business and business-to-consumer web sites (collectively, the “Infringing Web Sites”).

66. In order to deceive consumers into buying the Counterfeit Products, Defendants have designed the Infringing Web Sites to resemble legitimate web stores authorized to sell genuine True Religion Products. These Infringing Web Sites are in English, accept payment in U.S. dollars through PayPal and/or major credit card, claim to provide superior customer service and conceal the fact they are not located in the U.S. Defendants have copied the True Religion

Copyrights, namely proprietary web designs, photographs of genuine products and detailed product descriptions directly from the True Religion Web Store to further appear as legitimate web stores.

67. To perpetuate this scheme, Defendants have registered and are using a large number of domain names containing the TRUE RELIGION Marks including, without limitation, the following fifty-eight (58) domain names (collectively, the “Infringing Domain Names”):

1. truereligionjeans4outlet.com
2. cheapertruereligionjeans.com
3. truereligionjeans2sale.com
4. truereligionoutlet-sale.com
5. truereligion4outlet.com
6. truereligionoutlets2011.net
7. truereligionjeansoutlet8.com
8. jeans-true-religions.com
9. cheaptruereligionjeanssale.org
10. truereligionjeansbox.com
11. cheaptruereligionjeans2.com
12. truereligionjeans-outlets1.info
13. truereligionoutlet3.com
14. cheaptrue-religionjeans.com
15. truereligionoutlet8.com
16. cheaptruereligionjeanssale.net
17. truereligionjeanssales.com
18. true-religion-jeans-outlet.com
19. cheaptruereligion8.com
20. cheapjeanstruereligion.info
21. toptruereligionjeans.com
22. cheaptruereligionjeans.info
23. fortruereligionjeans.com
24. saletruereligionjeans.info
25. truereligionjeans.co.uk
26. truereligionjeans-outlet.cc
27. cheaptruereligion.co.uk
28. truereligionjeans-outlet.info
29. truereligion2cheap.com
30. truereligionjeans-outlets1.info
31. truereligion-cheap.com
32. truereligion-outlet.cc
33. truereligion2sale.com
34. truereligionoutletjeans.info
35. truereligionlike.com
36. truereligion-outletjeans.info
37. cheapertruereligionjeans.net
38. truereligionoutletjeans.cc
39. cheaptruereligionjeans2u.com
40. truereligionjeanssale.cc
41. cheaptruereligionjeans2011.com
42. truereligionoutlet.cc
43. truereligionoutletusa.com
44. jeans-true-religion.com
45. cheaptruereligionjeans-sale.com
46. truereligionoutletjeans-new.info
47. truereligionjeansbox.com
48. jeans-true-religions.com
49. truereligionjeans4sale.com
50. truereligionbrandjeansstore.com
51. mycheaptruereligionjeans.com
52. cheaptruereligionjeanssale.net
53. cheaptruereligionjeansoutlets.com
54. cheaptrue-religionjeans.com
55. cheaptruereligionjeansoutlets.net
56. cheap-true-religion-jeans.com
57. buytruereligionjeans.net
58. truereligion4sale.com

68. Defendants have registered and are using the Infringing Domain Names as locations for the Infringing Web Sites with a bad-faith intent to profit from TRUE RELIGION Marks.

69. By locating the Infringing Web Sites at the Infringing Domain Names, Defendants deceive consumers into believing that the Infringing Web Sites are selling genuine True Religion Products, when in fact they are selling low-quality counterfeits.

70. The Counterfeit Products are not genuine True Religion Products, and Defendants are in no way authorized to sell the Counterfeit Products or operate the Infringing Web Sites. True Religion did not manufacture, inspect or package the Counterfeit Products and did not approve the Counterfeit Products for sale or distribution. The Counterfeit Products are so similar in appearance to genuine True Religion Products that consumers are being deceived, just as Defendants intend, into believing the Counterfeit Products are genuine.

71. Defendants' use of the TRUE RELIGION Marks on or in connection with the advertising, marketing, distribution, offering for sale and sale of the Counterfeit Products and in conjunction with the Infringing Web Sites and Infringing Domain Names, is likely to cause and has caused confusion, mistake and deception by and among consumers and is irreparably harming True Religion and its TRUE RELIGION Marks, True Religion Copyrights and True Religion Design Patents.

COUNT ONE

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

72. Plaintiffs repeat and reallege the allegations above as if fully set forth herein.

73. The TRUE RELIGION Marks and the goodwill of the businesses associated with them in the United States are of great and incalculable value, are highly distinctive, and have

become universally associated in the public mind with True Religion Products and related services of the highest quality and reputation finding their source from True Religion.

74. Without True Religion's authorization or consent, and having knowledge of both True Religion's well-known and prior rights in the TRUE RELIGION Marks and the fact that Defendants' Counterfeit Products bear marks which are intentionally identical to the TRUE RELIGION Marks, Defendants have manufactured, distributed, offered for sale and/or sold the Counterfeit Products to the consuming public in direct competition with True Religion's sale of genuine True Religion Products, in or affecting interstate commerce.

75. Defendants' use of copies or simulations of the TRUE RELIGION Marks on Counterfeit Products and in conjunction with Defendants' Infringing Web Sites is likely to cause and is causing confusion, mistake and deception among the general purchasing public as to the origin of the Counterfeit Products, and is likely to deceive the public into believing the Counterfeit Products being sold by Defendants originate from, are associated with or are otherwise authorized by True Religion, all to the damage and detriment of True Religion's reputation, goodwill and sales. Accordingly, Defendants are using reproductions, counterfeits, and copies of True Religion's federally registered marks in violation of 15 U.S.C. § 1114.

76. True Religion has no adequate remedy at law and, if Defendants' activities are not enjoined, True Religion will continue to suffer irreparable harm and injury to its goodwill and reputation.

77. Defendants' actions demonstrate an intentional, willful, and malicious intent to trade on the goodwill associated with the TRUE RELIGION Marks to True Religion's great and irreparable injury.

78. Defendants are causing and will continue to cause substantial injury to the public and to True Religion, and True Religion is entitled to injunctive relief and to recover Defendants' profits, treble damages, or, in the alternative, maximum statutory damages as well as costs, and reasonable attorneys' fees under 15 U.S.C. §§ 1114, 1116 and 1117.

COUNT TWO

**CYBERSQUATTING UNDER THE ANTICYBERSQUATTING
CONSUMER PROTECTION ACT
(15 U.S.C. § 1125(d)(1))**

79. Plaintiffs repeat and reallege the allegations above as if fully set forth herein.

80. The Infringing Domain Names are identical or confusingly similar to one or more of the TRUE RELIGION Marks, which were distinctive and/or famous at the time Defendants registered each of the Infringing Domain Names.

81. Defendants have registered and used the Infringing Domain Names with a bad-faith intent to profit from the TRUE RELIGION Marks, namely by using the Infringing Domain Names to host the Infringing Web Sites where Defendants sell Counterfeit Products.

82. Defendants have no trademark or other intellectual property rights in the Infringing Domain Names.

83. Defendants' activities as alleged herein violate the federal Anticybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d)(1).

84. True Religion has no adequate remedy at law and, if the Defendants' activities are not enjoined, True Religion will continue to suffer irreparable harm and injury to its goodwill and reputation.

85. Defendants are causing and will continue to cause substantial injury to the public and to True Religion, and True Religion therefore is entitled to injunctive relief, including an

order requiring transfer of the Infringing Domain Names to True Religion and to recover maximum statutory damages.

COUNT THREE

COPYRIGHT INFRINGEMENT
(17 U.S.C. § 106, *et seq.*)

86. Plaintiffs repeat and reallege the allegations above as if fully set forth herein.

87. Plaintiffs are the owner of all right, title and interest in and to the True Religion Copyrights.

88. Defendants have copied the True Religion Copyrights by (a) manufacturing, distributing, offering for sale and selling Counterfeit Products, containing designs identical to the True Religion Copyrights and (b) publishing the Infringing Web Sites containing proprietary text, images and layout identical to the True Religion Copyrights.

89. The Defendants' acts violate True Religion's' exclusive rights in the True Religion Copyrights under Section 106 of the Copyright Act of 1976, 17 U.S.C. § 106, and constitute willful infringement of the True Religion Copyrights.

90. The Defendants have realized unjust profits, gains and advantages as a proximate result of their infringement and will continue to do so as long as such infringement is permitted to continue.

91. Unless the Defendants are immediately enjoined and prohibited from copying True Religion Copyrights, the Defendants will continue to intentionally infringe True Religion's Copyrights.

92. As a direct and proximate result of the Defendants' copyright infringement, Plaintiffs have suffered, and will continue to suffer, monetary loss to its business, reputation and goodwill.

COUNT FOUR

UNFAIR COMPETITION AND FALSE DESIGNATION OF ORIGIN

(15 U.S.C. § 1125(a))

93. Plaintiffs repeat and reallege the allegations above as if fully set forth herein.

94. Defendants' knowing use of reproductions or confusingly similar imitations of the TRUE RELIGION Marks in connection with the Counterfeit Products is causing and will continue to cause confusion, deception, and mistake among the general purchasing public, by creating the false and misleading impression that Defendants' goods are manufactured or distributed by True Religion, or are affiliated, connected, or associated with True Religion, or have the sponsorship, endorsement, or approval of True Religion.

95. By misappropriating and using the TRUE RELIGION Marks and trade name, Defendants misrepresent and falsely describe to the general public the origin and source of the Counterfeit Products and create a likelihood of confusion by consumers as to the source of such merchandise.

96. Defendants' unlawful, unauthorized and unlicensed manufacture, distribution, offer for sale and/or sale of the Counterfeit Products creates express and implied misrepresentations that the Counterfeit Products were created, authorized or approved by True Religion, all to Defendants' profit and to True Religion's great damage and injury.

97. Defendants' aforesaid acts are in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), in that Defendants' use of the TRUE RELIGION Marks, in connection with their goods and services, in interstate commerce constitutes a false designation of origin and unfair competition.

98. True Religion has no adequate remedy at law and, if the Defendants' activities are not enjoined, True Religion will continue to suffer irreparable harm and injury to its goodwill and reputation.

99. Defendants' actions demonstrate an intentional, willful, and malicious intent to trade on the goodwill associated with the TRUE RELIGION Marks to True Religion's great and irreparable injury.

COUNT FIVE

DESIGN PATENT INFRINGEMENT **(35 U.S.C. §271, *et seq.*)**

100. Plaintiffs repeat and reallege the allegations above as if fully set forth herein.

101. Defendants are manufacturing, advertising, distributing, offering to sell and/or selling Counterfeit Products that infringe the claims of the True Religion Design Patents. Such sales have taken place in this District and elsewhere in the United States.

102. Defendants have no license to conduct the infringing activities specified herein.

103. Defendants have willfully infringed the True Religion Design Patents in violation of 35 U.S.C. § 271, *et seq.*

104. The infringement of the True Religion Design Patents by Defendants has and will irreparably damage True Religion and deprive True Religion of sales, profits and royalties that True Religion would have made or could enjoy in the future, and has in other respects injured True Religion and will continue to injure and damage True Religion, including by loss of future profits and royalties, unless Defendants are enjoined from infringing the True Religion Design Patents.

105. Defendants' infringement will continue unless enjoined by this Court, as True Religion lacks an adequate remedy at law.

COUNT SIX

UNLAWFUL DECEPTIVE ACTS AND PRACTICES
(New York General Business Law § 349)

106. Plaintiffs repeat and reallege the allegations above as if fully set forth herein.

107. Defendants, without True Religion's authorization or consent, and having knowledge of True Religion's well-known and prior rights in the TRUE RELIGION Marks, have manufactured, imported, distributed, offered for sale and/or sold the Counterfeit Products bearing marks which are identical to the TRUE RELIGION Marks to the consuming public in direct competition with True Religion's sale of genuine True Religion Products in violation of New York General Business Law § 349.

108. Defendants' use of copies or simulations of the TRUE RELIGION Marks is likely to cause and is causing confusion, mistake and deception among the general purchasing public as to the origin of Defendants' Counterfeit Products, and is deceiving the public into believing the Counterfeit Products being sold by Defendants originate from, are associated with, or are otherwise authorized by True Religion.

109. Defendants' deceptive acts and practices involve public sales activities of a recurring nature.

110. True Religion has no adequate remedy at law and, if Defendants' activities are not enjoined, True Religion will continue to suffer irreparable harm and injury to its goodwill and reputation.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment against Defendants as follows:

1. That Defendants, their officers, agents, servants, employees, confederates, and all persons acting for, with, by, through or under them be permanently enjoined and restrained from:

- (a) using the TRUE RELIGION Marks, including any trademark, service mark, name, logo, design or source designation of any kind owned by True Religion, or any reproduction, counterfeit, copy or colorable imitation of the TRUE RELIGION Marks in connection with the distribution, advertising, offer for sale and/or sale of merchandise not the genuine products of True Religion; and
- (b) passing off, inducing or enabling others to sell or pass off any Counterfeit Products as and for True Religion Products; and
- (c) shipping, delivering, holding for sale, distributing, returning, transferring or otherwise moving, storing or disposing of in any manner jeanswear, sportswear, accessories, and/or other products falsely bearing the TRUE RELIGION Marks, True Religion Copyrights, True Religion Design Patents or any reproduction, counterfeit, copy or colorable imitation of same; and
- (d) directly or indirectly infringing True Religion Copyrights in any manner throughout the world, including, but not limited to, reproducing, adapting, and/or displaying True Religion Copyrights by distributing, importing, exporting, advertising, selling, and/or offering for sale, or causing others to do so, any product, including without limitation, products bearing designs substantially similar to True Religion Copyrights;
- (e) directly or indirectly infringing True Religion Design Patents in any manner throughout the world, including, but not limited to, reproducing, adapting, and/or displaying True Religion Design Patents by distributing, importing, exporting, advertising, selling, and/or offering for sale, or causing others to do so, any product, including without limitation, clothing bearing designs substantially similar to True Religion Design Patents;
- (f) from committing any acts calculated to cause purchasers to believe that Defendants' products are those sold under the control and supervision of True Religion, or sponsored or approved by, or connected with, or guaranteed by, or produced under the control and supervision of True Religion;
- (g) utilizing the Infringing Domain Names and registering, trafficking in, or using any additional domain names that use or incorporate any of the TRUE RELIGION Marks, or any colorable imitation thereof; and
- (h) using the TRUE RELIGION Marks, including any trademark, service mark, name, logo, design or source designation of any kind owned by True Religion, or any reproduction, counterfeit, copy or colorable imitation of the TRUE RELIGION Marks in connection with Defendants' domain names, websites, other online services or activities, or any other goods or services, that is likely to cause confusion, mistake, deception, or public misunderstanding that such domain names, websites, other online services or activities, or other goods or services are produced or provided by True Religion, or are sponsored or authorized by or in any way connected or related to True Religion; and

- (i) operating the Infringing Web Sites; and
- (j) from further infringing any of the TRUE RELIGION Marks, True Religion Copyrights, True Religion Design Patents or damaging True Religion's goodwill; and
- (k) from otherwise competing unfairly with True Religion in any manner.

2. That Defendants, within thirty (30) days after service of judgment with notice of entry thereof upon it, be required to file with the Court and serve upon True Religion a written report under oath setting forth in detail the manner in which Defendants have complied with paragraphs (a) through (k), *supra*.

3. That the domain name registries, including but not limited to VeriSign, Inc., Neustar, Inc., and the Public Interest Registry, and/or the individual registrars holding or listing one or more of the domain names used in conjunction with Defendants' Infringing Web Sites, including the Infringing Domain Names, shall, disable and/or continue to disable these domain names, through a registry hold or otherwise, and make them inactive and non-transferable.

4. That VeriSign, Inc., NeuStar, Inc., and the Public Interest Registry, and/or the individual registrars holding or listing one or more of the domain names cooperate with a registrar to be appointed by True Religion to re-register the Infringing Domain Names in True Religion's name and under True Religion's ownership.

5. That Defendants account for and pay over to True Religion profits realized by Defendants and damages caused to True Religion, by reason of Defendants' unlawful acts herein alleged and, that the amount of damages for infringement of True Religion's registered trademarks be increased by a sum not exceeding three times the amount thereof as provided by law.

6. In the alternative, that True Religion be awarded statutory damages of \$2 million for each and every TRUE RELIGION Mark counterfeited by each Defendant, \$250,000 for each and every Infringing Domain Name used in the context of Defendants' willful counterfeiting and cybersquatting, and \$150,000 for each and every True Religion Copyright counterfeited by each Defendant.

7. That True Religion be awarded reasonable attorneys fees and have such other and further relief as the Court may deem equitable including, but not limited to, any relief set forth under Sections 34-39 of the 1946 Trademark Act.

8. That True Religion be granted such other and further relief as the Court may deem just.

Dated: November 14, 2011
New York, NY

Respectfully submitted,

By: 
Scott Geln (geln@gtlaw.com)
Scott E. Thompson (thompsonse@gtlaw.com)
Bryn K. Haffey (haffeyb@gtlaw.com)
MetLife Building
200 Park Avenue, 34th Floor
New York, NY 10166
Telephone: (212) 801-9200
Facsimile: (212) 801-6400

*Attorneys for Plaintiffs TRUE RELIGION
APPAREL, INC.; GURU DENIM, INC.*