

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
IN NASHVILLE**

TAYLOR SWIFT,

Plaintiff

v.

MALCOLM MATTHEWS, RENEE SUSAN MITCHELL, LOUIS MOORE, MARTIN D. QUATTLEBAUM, MARSHA DYONNE TYLER, VARIOUS JOHN DOES, VARIOUS JANE DOES, and VARIOUS XYZ CORPORATIONS,

Defendants

Civil Action No. _____

**JURY DEMAND
FILED UNDER SEAL**

***EX PARTE* MOTION FOR TEMPORARY RESTRAINING ORDER,
MOTION FOR PRELIMINARY INJUNCTION AND
APPLICATION FOR ORDER OF SEIZURE OF COUNTERFEIT GOODS**

Plaintiff Taylor Swift (“Plaintiff”), by and through her undersigned counsel and pursuant to the Trademark (Lanham) Act, 15 U.S.C. § 1051 *et seq.* and §§ 1116(a) and (d), Tennessee Personal Rights Protection Act of 1984, Tenn. Code Ann. § 47-25-1101 *et seq.*, and Rule 65(b) of the Federal Rules of Civil Procedure, moves this Court for an Order restraining Defendants’ infringement on Plaintiff’s trademarks TAYLOR SWIFT, TAYLOR SWIFT (Stylized) and FEARLESS (“Plaintiff’s Trademarks”), Defendants’ use of counterfeits of Plaintiff’s Trademarks, Defendants’ use of Plaintiff’s name and likeness, and Defendants’ violation of Plaintiff’s personal rights, and for an order of seizure of goods bearing counterfeits of Plaintiff’s Trademarks.

Plaintiff accompanies this Motion by the contemporaneously-filed:

1. Verified Complaint;
2. Memorandum of Law in Support of *Ex Parte* Motion for Temporary Restraining Order, Motion for Preliminary Injunction and Application for Order of Seizure of Counterfeit Goods;
3. Attorney Certification in Support of Plaintiff's *Ex Parte* Motion for Temporary Restraining Order, Motion for Preliminary Injunction and Application for Order of Seizure of Counterfeit Goods;
4. Declaration of Francisco Javier Dominguez in support of Plaintiff's *Ex Parte* Motion for Temporary Restraining Order, Motion for Preliminary Injunction and Application for Order of Seizure of Counterfeit Goods (attached hereto as Exhibit A);
5. Declaration of Crom Tidwell in support of Plaintiff's *Ex Parte* Motion for Temporary Restraining Order, Motion for Preliminary Injunction and Application for Order of Seizure of Counterfeit Goods (attached hereto as Exhibit B);
6. Proposed Notice to Defendants to accompany the execution of the Court's seizure order (attached hereto as Exhibit C);
7. Proposed Temporary Restraining Order and Order of Seizure of Counterfeit Goods (attached hereto as Exhibit D); and
8. A true and correct copy of Plaintiff's notice of this application to Edward M. Yarbrough, the United States Attorney for the Middle District of Tennessee, as required by 15 U.S.C. § 1116(d)(2) (attached hereto as Exhibit E).

Respectfully submitted,

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