IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

JAMES "JIM" CORNETTE, individually

Plaintiff,

v. **CASE NO.** 3:19-cv-219

BRANDON GRAVER, individually,
WILLIAM J. MOLNAR, JR., individually,
and d/b/a THE INDY CONNECTION,
THE INDY CONNECTION, INC.,
SHOPIFY, INC., a Canadian Corporation,
SHOPIFY (USA), INC., a Delaware Corporation

Defendant.

COMPLAINT

JURISDICTION AND VENUE

1. This is a civil action seeking damages and injunctive relief for trademark infringement under the Lanham Act, 15 U.S.C. § 1051 *et seq.* and supplemental jurisdiction under 28 U.S.C. § 1367(a) for the claims arising under Pennsylvania Law.

2. This Court has jurisdiction of this action under15 U.S.C. § 1121, 28 U.S.C. § 1331, and 28 U.S.C. § 1338.

3. This Court also has jurisdiction of this action under 28 U.S.C. § 1332(a). Plaintiff James "Jim" Cornette is a citizen of the State of Kentucky. None of the Defendants are citizens of the State of Kentucky. The amount in controversy is in excess of $75,000 (Seventy-Five Thousand Dollars), exclusive of interest and costs.

4. This Court has personal jurisdiction over defendants in that they have the requisite minimum contacts under the Pennsylvania Long-Arm Statute 42 Pa. C.S. § 5322 and/or personal

jurisdiction is otherwise proper under the laws of Pennsylvania and the constitutional requirements of due process under the Constitution of the United States.

5. Venue is proper pursuant to 28 U.S.C. § 1391(b)(2).

THE PARTIES

6. Plaintiff James "Jim" Cornette (hereinafter referred to as "Jim Cornette") is a resident and citizen of Louisville, Jefferson County, Kentucky.

7. Plaintiff Jim Cornette is a professional wrestling living legend and believed by many to be the world's leading expert on all matters having in any way to do with the sport of professional wrestling.

8. Jim Cornette is an avid life-long fan and fixture in the professional wrestling world. When Jim Cornette was 14, he began working as a photographer, time keeper, and magazine correspondent, and public relations correspondent in the wrestling venue. Jim Cornette progressed to become a permanent fixture in the world of professional wrestling.

9. Jim Cornette was writing programs for arena shows, having photos published in wrestling magazines, and contributing to Championship Wrestling Magazine by 1982.

10. In 1982, Jim Cornette also became a manager on television and managed various wrestlers for the Continental Wrestling Association. This new facet of his long career was at the request of the association's promoter, Jerry Jarrett.

11. The next year, Jim Cornette moved on to Mid-South Wrestling and managed a new wrestling tag team owned by Promoter Bill Watts, The Midnight Express. During his time with Mid-South Wrestling, many attendance records were broken.

12. After leaving Mid-South, Jim Cornette became a nationally known wrestling personality on cable television's highest rated program, World Championship Wrestling.

13. Plaintiff Jim Cornette subsequently owned and operated two of his own wrestling companies, as well as served in chief creative positions in WWE, Ring of Honor Wrestling, and other wrestling promotions.

14. In 1993, Jim Cornette became employed by the World Wrestling Federation. He held many positions from 1993 through 1997, including manager, color commentator, member of the booking committee, and scouting and developing new talent. He continued managing professional wrestlers.

15. Jim Cornette became a household name and his persona was easily recognized by wrestling fans. He was part of television production teams and because a Management Director for TNA (Total Nonstop Action) Wrestling in the early 2000s.

16. In 2009, Jim Cornette became the executive producer for the Ring of Honor Wrestling Show and remained with the show until 2012.

17. In recent years, Jim Cornette has continued to provide color commentary for professional wrestling, including "What Culture Pro Wrestling," "National Wrestling Alliance," and "Major League Wrestling.

18. Jim Cornette is considered one of professional wrestling's foremost historians, and is often the go-to for television productions looking for historians.

19. Jim Cornette's skills as a talent evaluator and developer are renowned throughout wrestling, having developed some of the biggest stars in the history of the wrestling business.

20. Between Jim Cornette's on-screen performances, creative roles in wrestling's biggest companies, and thorough research of wrestling's history, he developed opinions and critiques of certain types of wrestling. 1

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1 Plaintiff Cornette is so good at his job, that in prior litigation involving plaintiff, witnesses do not

21. Jim Cornette currently hosts two podcasts, "The Jim Cornette Experience" and "Jim Cornette's Drive-Thru."

22. Jim Cornette also owns and operates a web site, www.jimcornette.com, which was created on June 2, 2008.His site offers merchandise for sale, including T-Shirts, books, and wrestling memorabilia. The site also contains commentary, podcasts, and other information related to professional wrestling. (Exhibit A.)

23. Defendant Brandon Graver (hereinafter "Graver") is a resident and citizen of Altoona, Pennsylvania, who wrestles under the ring name of G-Raver.

24. Defendant Graver debuted on September 8, 2007, but upon information and belief, has never held any championship titles or championship belts.

25. Defendant Graver engages in what is commonly known as "Death Matches," wherein, individuals such as Defendant Graver beat each other with weapons such as, tables, ladders, barbed wire, panes of glass, fluorescent light tubes, usually resulting in both performers injured and covered in blood. Plaintiff Cornettehas been and continues to be a vocal opponent of "Death Matches."

26. Defendant William J. Molnar, Jr. (hereinafter "Molnar") is a resident at 424 Thornton Road, Brownsville, Pennsylvania 15417.

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know where the character begins and the "real person" ends. Plaintiff avers that there is no distinction and has not been for over 30 years. See, e.g., Massey et ux v. Jim Crockett Promotions, et al, 400 S.E.2d 876 (W. Va. 1990) fn 8, "There was evidence which indicated that the wrestlers and their manager were to provoke the crowd as part of their performance. For example, Edward Vaught, one of the security guards who was working at the armory the night of the incident, gave the following testimony at a deposition regarding Mr. Cornette's conduct toward Mr. Massey after "Sweet Stan" had assaulted him. He stated: **"Mr. Cornette, I don't know, whether it's just something to build up for his reputation, his image he's suppose to hold or what. If you watch the program, *he's all the time running his mouth*, so I just gathered that this was something that he was supposed to do in this incident." (emphasis added)**

27. Molnar is, upon information and belief, the principal owner and operator of The Indy Connection, Inc., an online, e-commerce store, selling merchandise, including, but not limited to, T-Shirts, key chains, stickers, and other items. The web site offering these items for sale is https://theindyconnection.com/.

28. Defendant The Indy Connection, Inc. (hereinafter "Indy Connection") was incorporated on September 11, 2019 as a Pennsylvania Non-Stock Corporation. Indy Connection is located at 500 Front Street, Brownsville, Pennsylvania. Based upon information and belief, Defendant Indy Connection is a continuation of the business owned and operated by Defendant Molnar, offering items for sale online at https://theindyconnection.com/. (Exhibit B.)

29. On September 12, 2019, the domain name "fuckjimcornette.com" was registered. (Exhibit C.)

30. On September 27, 2019, Defendant Indy Connection filed an application to trademark the word mark "Fuck Jim Cornette," which was to be used for clothing. (Exhibit D.)

31. The principal place of business of Defendant, Shopify, Inc., a Canadian Corporation, is Ottawa, Ontario, Canada.

32. Shopify, Inc. is a cloud-based, multi-channel commerce platform designed for small and medium-sized businesses. Merchants can use the software to design, set up, and manage their stores across multiple sales channels, including web, mobile, social media, marketplaces, brick-and-mortar locations, and pop-up shops. The platform also provides merchants with a powerful back-office and a single view of their business.

33. Upon information and belief, Defendant Shopify hosts hundreds of retail websites owned and operated by Pennsylvania residents and businesses, including the one owned and operated by Defendant Molnar and Defendant Indy Connection.

34. Pennsylvania is one of the states in which merchants have access to the Shopify Fulfillment Center, which provides two-day shipping to a merchant's customers. (*See*, https://venturebeat.com/2019/06/19/shopify-announces-new-partner-and-developer-tools-plus-an-ai-powered-fulfillment-network/.)

35. Defendant Shopify (USA), Inc. (hereinafter "Shopify (USA)") is a Delaware corporation, with its principal place of business in San Francisco, California.

36. Shopify (USA) provides Kit and Ping applications for use by the Shopify merchants. Shopify (USA) describes the Kit app as "a proactive, artificially-intelligent assistant" used for marketing; and, describes the Ping app as "a free messaging app that lets you spend more time with customers and attract new shoppers." (*See,* https://apps.shopify.com/kit and https://www.shopify.com/ping.)

37. Upon information and belief, Defendants Molnar and Indy Connection use the services of Defendants Shopify and Shopify (USA) in the marketing and sale of the products on the Indy Connection web site.

FACTUAL ALLEGATIONS OF CONDUCT RESULTING IN CLAIMS

38. On or about August 31, 2019, a fan tweeted Plaintiff Jim Cornette via Twitter a video of a recent "Death Match" between Defendant Graver and another wrestler in which Defendant Graver was injured when a fluorescent tube that had been affixed to a ladder used in the match broke, slicing his arm.

39. Plaintiff Jim Cornette, a long-time protestor against matches of this nature, re-tweeted the tweet, saying, "That's a nasty little nick the guy got on his arm there at the end, if fans were lucky they probably stopped the show so everyone could watch this idiot bleed out."

40. Defendant Graver replied to Plaintiff Cornette's tweet, saying, "Hey @TheJimCornette, let me see you at a convention. I'll spit in your fucking mouth. You've done nothing to me. Now you're an advocate for death?"

41. Plaintiff Jim Cornette replied to Defendant Graver's tweet, saying, "No, I treated it as they were both stupid dumb fucks doing something stupid they shouldn't have been doing and that even a blind man could have seen was going to cause serious injury, all to pretend to be 'pro wrestlers' in front of a handful of idiots who like that kinda thing."

42. Defendant Graver replied to Plaintiff Jim Cornette's tweet, saying, "You prob didn't expect this 'pro wrestler' would grab any attention whatsoever right? When you die from old age, I'll be there to piss all over you. Can't wait."

43. Plaintiff JimCornette was made aware of a t-shirt being made, sold and distributed via the e-commerce site, The Indy Connection, Inc. The t-shirt depicted Plaintiff Jim Cornette's likeness, specifically; his head, with tattoo needles protruding from his forehead, his eyes covered with bloody Xs and his mouth gagged. The words, "Fuck Jim Cornette" were printed around the image. Plaintiff did not consent to the use of his name or image.

44. Upon discovery of the t-shirt Defendants Shopify and/or Shopify (USA) were notified of the offending t-shirt and it was removed from the web site.

45. Subsequently, the t-shirt was offered for sale on the web site under the description "Plain Black Tee."

46. Another complaint was made to Defendants Shopify and/or Shopify (USA) and the "Plain Black Tee" was removed from the web site.

47. A different t-shirt began being offered for sale on The Indy Connection web site. This t-shirt depicted Plaintiff Jim Cornette's likeness, specifically; his head, with tattoo needles

protruding from his forehead, his eyes covered with bloody Xs and his mouth gagged. The words, "Mother Fucker" were printed around the image. Plaintiff did not consent to the use of his name or image.

48. Purchasers can reach the t-shirt by typing www.fuckjimcornette.com and the URL is https://theindyconnection.com/products/back-from-the-dead-tee. The price of the t-shirt is $24.99.

49. On or about October 8, 2019, Defendant Graver broadcast a tweet promoting the t-shirt: "Get your spooky on over at Fuckjimcornette.com."

50. Defendants Shopify and Shopify (USA) transacted business in the Commonwealth of Pennsylvania by providing an e-commerce platform and accompanying applications for use with the platforms to individuals and corporations, specifically Defendant Molnar and Defendant Indy Connection thereby realizing pecuniary benefit in the form of fees for the services provided.

51. Defendants Shopify and Shopify (USA) contracted to supply services or things in the Commonwealth of Pennsylvania, specifically e-commerce platforms and accompanying applications for use with the platforms and did provide the services or things to Defendant Molnar and Defendant Indy Connection.

52. Defendants Shopify and Shopify (USA) caused harm or tortious injury to Plaintiff Jim Cornette by acts and omissions that occurred both in and out of the Commonwealth of Pennsylvania. Defendants provided e-commerce platforms and accompanying applications for use with the platforms to Defendant Molnar and Defendant Indy Connection, which were used in violation of 42 Pa.Cons.Stat. Ann. §8316 with the knowledge and consent of Defendants Shopify and Shopify (USA).

FIRST CLAIM-UNFAIR COMPETITION
(LANHAM ACT § 43(a), 15 U.S.C. § 1125(a))

53. For his First Claim, Plaintiff Jim Cornette incorporates the allegations of Paragraphs 1 (One) through 52 (Fifty-Two) of this Complaint as if fully restated herein.

54. Plaintiff Jim Cornette has been involved in professional wrestling for over three decades and his name has become synonymous with his extensive experience, knowledge, and commentary. Plaintiff utilizes his persona, in part, for economic benefit to him by operating a web site, selling merchandise, and producing podcasts in interstate commerce.

55. Plaintiff has invested significant resources to develop and promote his skills related to professional wrestling and has been successful in this endeavor. Over the decades, Plaintiff has acquired a reputation of being knowledge about every aspect of professional wrestling. He is respected and has generated goodwill associated with his name.

56. Plaintiff Jim Cornette's name is widely recognized throughout the United States and overseas in conjunction with professional wrestling. In fact, he writes a monthly column for Spirit Fighting Magazine, the United Kingdom's largest pro wrestling/MMA magazine.

57. Plaintiff Jim Cornette's name has acquired a secondary meaning.

58. Defendant Molnar and Defendant Indy Connection intentionally offered for sale t-shirts with Plaintiff Jim Cornette's likeness and/or name; intentionally applied for a trademark containing Plaintiff Jim Cornette's name; and, intentionally registered and used a domain name with Plaintiff Jim Cornette's name.

59. These Defendants unauthorized use of Plaintiff's name is likely to cause confusion, to cause mistake, and/or to deceive customers and potential customers of the parties, as to the origin, sponsorship, or approval of Defendant's products and services, or as to some affiliation, connection, or association of Defendant with Plaintiff Jim Cornette.

60. Plaintiff Jim Cornette is a blunt and colorful speaker. In fact, one of the t-shirts offered for sale by Plaintiff contains the words: "Thank You, Fuck You, Bye." Therefore, while initially it may seem that no confusion can occur with the phrase "Fuck Jim Cornette," the nature of the commentary by Plaintiff and the merchandise for sale on the web site render what may otherwise be viewed as an unrelated phrase, would, in fact, be a phrase that is consistent with the merchandise of Plaintiff Jim Cornette.2

61. Defendants Molnar and Indy Connection's unauthorized use allows the Defendants to trade on and receive the benefit of goodwill Plaintiff, which was generated with a great expenses of labor, time, and money over three plus decades, and to generate income for Defendants' t-shirts and apparently planned clothing line on the reputation and goodwill of Plaintiff Jim Cornette, his web site, his products, and his commentary.

62. Defendants Molnar and Indy Connection's actions prevent Plaintiff Jim Cornette from controlling the nature and quality of his products and services permits Defendants to economically benefit from the goodwill and valuable reputation of Plaintiff Jim Cornette.

63. Defendants Molnar and Indy Connection's use of Plaintiff's name is misleading and/or causes actual confusion.

64. On information and belief, Defendants' unlawful conduct as set forth herein is willful, deliberate, and in bad faith.

2Massey, supra; "Mr. Clark also escorted Mr. Massey back to the wrestlers' dressing room under the belief that they intended to apologize to Mr. Massey. Mr. Clark stated that **Mr. Cornette used obscene language and stated that Mr. Massey "was a dirty son-of-a-bitch and ought to be kicked off the face of the earth."** (emphasis added) Mr. Clark stated, however, that neither "Beautiful Bobby" nor "Sweet Stan" made any statements to Mr. Massey.See, also, https://www.youtube.com/watch?v=WngpAHJNDhQ, commonly referred to as the "Dairy Queen incident."

65. The acts of Defendants complained of herein constitute a false designation of origin, in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

66. The acts of Defendants Molnar and Indy Connection as described herein constitute unfair competition in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

67. Plaintiff Jim Cornette has been, and continues to be, irreparably damaged by the violation of this statute, and has no adequate remedy at law. Unless enjoined, Defendants will continue to use Plaintiff's name, image, and domain name, further injuring Plaintiff and confusing the public. Unless the foregoing alleged actions of Defendants are enjoined, Plaintiff Jim Cornette will suffer injury and damage.

SECOND CLAIM-FEDERAL TRADEMARK DILUTION
(LANHAM ACT § 43(c), 15 U.S.C. § 1125(c))

68. For his Second Claim, Plaintiff Jim Cornette incorporates the allegations of Paragraphs 1 (One) through 67 (Sixty-Seven) of this Complaint as if fully restated herein.

69. Defendants Molnar and Indy Connection's unauthorized use of the name, image, and domain name of Plaintiff Jim Cornette violate Section 43(c) of the Lanham Act, 15 U.S.C. § 1125(c). Plaintiff's name, image, and domain name are famous.

70. Defendants have made and continue to make commercial use of the name, image, and domain name in interstate commerce. This use started long after Plaintiff's name and image became famous. The use is likely to cause, and in fact has caused, dilution of the distinctive quality of Plaintiff's name and image by impairing the distinctiveness, and harming and tarnishing the reputation, of the Plaintiff's marks.

71. On information and belief, Defendants Molnar and Indy Connection's unlawful conduct as described herein is willful, deliberate, and in bad faith.

72. These violations have irreparably damaged Plaintiff Jim Cornette, and he has no adequate remedy at law. Unless enjoined, Defendants' unlawful conduct will continue, further injuring Plaintiff Jim Cornette and confusing the public.

THIRD CLAIM-FEDERAL TRADEMARK CYBERPIRACY
(LANHAM ACT § 43(c), 15 U.S.C. § 1125(d))

73. For his Third Claim, Plaintiff Jim Cornette incorporates the allegations of Paragraphs 1 (One) through 72 (Seventy-Two) of this Complaint as if fully restated herein.

74. Defendants Molnar and Indy Connection's unauthorized registration and use of the fuckjimcornette.com domain name constitutes cyberpiracy and violates Plaintiff Jim Cornette's rights under Section 43(d) of the Lanham Act, 15 U.S.C. § 1125(d).

75. Plaintiff's name and domain name, having been registered since 2008, was distinctive and famous at the time of the registration of the offending domain name by Defendants, which domain name is identical or confusingly similar to Plaintiff's name and domain name and dilutive of Plaintiff's name and domain name.

76. Defendants registeredand/or used (and continue to use) Plaintiff's name and domain name in commerce and have done so with a bad faith intent to profit from Plaintiff's famous and distinctive name and domain name.

77. These violations have irreparably damaged Plaintiff Jim Cornette, and he has no adequate remedy at law. Unless enjoined, Defendants' unlawful conduct will continue, further injuring Plaintiff Jim Cornette and confusing the public.

78. On information and belief, Defendants have received revenues and profits as a result of their use of the offending domain name. Defendants are not entitled to these revenues and profits and Plaintiff has suffered other damages as a result of the infringing uses, for which Defendants are responsible.

FOURTH CLAIM-COMMON LAW TRADEMARK INFRINGEMENT UNFAIR COMPETITION, AND DILUTION

79. For his Fourth Claim, Plaintiff Jim Cornette incorporates the allegations of Paragraphs 1 (One) through 78 (Seventy-Eight) of this Complaint as if fully restated herein.

80. Defendant Molnar and The Indy Connection's foregoing registration and use of the name, image, and domain name are in violation of the common law, including the common law of the Commonwealth of Pennsylvania.

81. The use constitutes willful and deliberate trademark infringement and unfair competition. In particular, Defendants are using the name, image, and domain name in commerce for their own commercial benefit in a manner that is likely to and in fact has caused confusion or mistake among consumers in the marketplace, is misleading, and is likely to cause dilution of Plaintiff's name, image, and domain name.

82. On information and belief, Defendants' unlawful conduct as set forth herein is willful, deliberate, and in bad faith.

83. Plaintiff Jim Cornette has been, and continues to be, irreparably damaged by the violation of this statute, and has no adequate remedy at law. Unless enjoined, Defendants will continue to use Plaintiff's name, image, and domain name, further injuring Plaintiff and confusing the public. Unless the foregoing alleged actions of Defendants are enjoined, Plaintiff Jim Cornette will suffer injury and damage.

84. On information and belief, Defendants Molnar and Indy Connection have received revenues and substantial profits as a result of their unauthorized uses, to which they are not entitled, and Plaintiff Jim Cornette has suffered other damages as a result of the unauthorized uses, for which these Defendants are responsible.

FIFTH CLAIM-UNAUTHORIZED USE OF PLAINTIFF'S NAME AND LIKENESS (42 Pa. C.S.A. § 8316)

85. For his Fifth Claim, Plaintiff Jim Cornette incorporates the allegations of Paragraphs 1 (One) through 84 (Eighty-Four) of this Complaint as if fully restated herein.

86. Defendants Molnar, Indy Connection, Garner, Shopify, and Shopify (USA) used Plaintiff Jim Cornette's name and/or likeness for commercial and/or advertising purposes.

87. Plaintiff Jim Cornette's image and name have commercial value, which Plaintiff has expended time, money, and labor establishing.

88. Plaintiff did not give any Defendant permission to use his image and/or name.

89. Plaintiff informed all of the Defendants that he objected to the use of his name and/or image on the offending t-shirt containing the phrase "Fuck Jim Cornette."

90. As a result of Defendants' violation of 42 Pa. C.S.A. § 8316, Plaintiff Jim Cornette has suffered and will continue to suffer damages for which the Defendants are responsible.

SIXTH CLAIM-CONSPIRACY UNDER PENNSYLVANIA LAW (IN THE ALTERNATIVE)

91. For his Sixth Claim (in the alternative), Plaintiff Jim Cornette incorporates the relevant allegations of Paragraphs 1 (One) through 90 (Ninety) as if fully restated herein.

92. If Defendants Molnar, Indy Connection, and Graver did not gain or intend to gain any economic benefit, then Defendants acted solely to injure Plaintiff Jim Cornett by using his name and/or likeness without his permission on t-shirts, a domain name, and applying for a trademark.

93. By their actions described herein, these Defendants acted with a common purpose to do unlawful acts and/or to do a lawful act by unlawful means or for an unlawful purpose.

94. These Defendants acted together with actual malice to attempt to use Plaintiff's name and/or likeness for the sole purpose of harming Plaintiff. Defendants' intent is evident from the domain name registered, the nature of the t-shirts, the intent to develop an entire line of clothing, and the statements of the Defendants.

95. As a direct result of Defendants' malicious acts, Plaintiff Jim Cornette suffered damages as heretofore alleged.

WHEREFORE, Plaintiff James "Jim" Cornette demands judgment of the said Defendants as follows:

(A) Preliminarily and permanently enjoining and restraining Defendants, their officers, agents, subsidiaries, servants, partners, employees, attorneys, assigns and affiliates, and all others in active concert or participation with Defendants from:

1. using Plaintiff's name, image, or any colorable imitation thereof, on or in connection with the manufacture, importation, advertisement, publicity, promotion, marketing, sale, purported licensing, or other distribution of any product;

2. doing any other act or thing likely to confuse, mislead, or deceive others into believing that Defendants or their products emanate from, or are affiliated or connected with, or sponsored or approved by Plaintiff;

3. making misleading statements in any way related to Plaintiff;

4. further infringing or using Plaintiff's name or likeness;

5. otherwise unfairly competing with Plaintiff in any manner;

6. acting in any manner which dilutes Plaintiff's name or image;

7. using any domain name containing Plaintiff's name; and,

8. assisting, aiding or abetting any other person or business entity in engaging in or performing any of the activities referred to in subparagraphs 1 (One) through 7 (Seven) above.

(B) An order requiring Defendant The Indy Connection, Inc. to transfer to Plaintiff its registration for the domain name fuckjimcornette.com and any registrations for other domain names confusingly similar to Plaintiff's.

(C) An order requiring Defendant The Indy Connection, Inc. to withdraw its application for the trademark "Fuck Jim Cornette."

(D) Damages in excess of $75,000 (Seventy-Five Thousand Dollars) in an amount to be determined at trial.

(E) An award of Defendants' profits wrongfully derived from Defendants' unauthorized use of the Plaintiffs' name and image and the fuckjimcornette.com domain name and from Defendants' unlawful trafficking in the offending domain name.

(F) Plaintiff's attorney fee incurred in prosecuting this action;

(G) Prejudgment and post judgment interest.

(H) Punitive damages.

(I) An order requiring Defendants to file with the Court and serve on Plaintiff's counsel within thirty (30) days after entry of an injunction, a report in writing, under oath, setting forth in detail the manner in which Defendants have complied with the Court's orders.

(J) Such other and further relief as the Court shall deem appropriate.

PLAINTIFF DEMANDS A JURY TRIAL ON ALL ISSUES SO TRIABLE.

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