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CLERK U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIF.
LOS ANGELES, CA

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7

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10

11 MANWIN LICENSING
12 INTERNATIONAL SARL, a
Luxembourg Limited Liability
13 Company,

14 Plaintiff,

15 v.

16 NICHOLAS BULGIN, a/k/a "Gill
Manwinder," "Yi Weng," "Chris Hill,"
17 "contact@Manwinsucks.com," "Jim
Jagen," and "Radishdreams", an
18 individual, JAMES MARTIN, an
individual, and Does 1-10, inclusive
19

20 Defendant.
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CASE NO. 12-02484 GW (SHx)

**FIRST AMENDED COMPLAINT
FOR:**

- (1) VIOLATION OF THE ANTI-
CYBERSQUATTING CONSUMER
PROTECTION ACT
(2) DEFAMATION
(3) INTENTIONAL INTERFERENCE
WITH PROSPECTIVE ADVANTAGE
(4) UNFAIR COMPETITION

JURY DEMAND

Mitchell
Silberberg &
Knupp LLP

1 Plaintiff Manwin Licensing International S.à.r.l. ("Manwin") avers as
2 follows:

3 **PRELIMINARY STATEMENT**

4 1. Manwin owns and licenses the trademarks and domain names used for
5 many of the most popular adult-oriented websites, including YouPorn.com, the
6 single most popular free adult video website on the Internet, as well as xTube.com,
7 Pornhub.com, and Brazzers.com, to cite only a few examples. Manwin also
8 manages worldwide online content under the "Playboy" trademark and runs
9 Playboy TV, which has its principal place of business in this judicial district, under
10 license from Playboy Enterprises, Inc. Manwin and its brands are known
11 throughout the world as signifiers of high-quality adult-oriented content. By this
12 action, Manwin seeks to put an immediate stop to, as well as obtain redress for, a
13 campaign of harassment, defamation, and trademark infringement propagated by
14 Defendants that was designed to extort hundreds of thousands of dollars from
15 Manwin.

16 2. Defendants are in the "business" of registering Internet domain names
17 incorporating trademarks owned by others (a practice known as "cybersquatting").
18 Cybersquatters, in general, seek to obtain unjustified payments from trademark
19 owners who recognize that the cost of pursuing such infringers often is greater than
20 purchasing the domain name from the cybersquatter. Defendants, however, have
21 taken this concept to a new level. As part of an elaborate scheme to extort a
22 payment from Manwin, Defendants selected Manwin as the target of a massive,
23 ongoing harassment campaign. In furtherance of this campaign, Defendants:

- 24 ● Registered dozens of domain names incorporating Manwin's
25 trademarks (the "Manwin Domains").
- 26 ● Created a Twitter account (using the handle @ManwinSucks) and
27 Blogspot Page (manwinsucks.blogspot.com) for the purpose of disseminating false
28 and defamatory material about Manwin and launch public campaigns to harm

1 Manwin's business interests (including unfounded allegations of involvement in
2 child pornography).

3 • Created a slew of fake names and "personas" who purported to own
4 each of the infringing Manwin Domains; publicly claimed that they were being
5 "harassed" by Manwin over their "legitimate" domain names; contacted Manwin's
6 business partners; and then made exorbitant monetary demands on Manwin for sale
7 of the infringing Manwin Domains.

8 • Invented a nonexistent individual, "Gill Manwinder," and then used
9 that fake name in an attempt to interfere with Manwin's trademark application by
10 claiming that the "Manwinder" family name was being tarnished by Manwin.

11 • Sent dozens of e-mails to Manwin and its employees threatening to
12 dilute the Manwin trademark and divert Manwin's traffic to Defendants' own
13 websites and the infringing Manwin Domains.

14 3. The purpose of the foregoing conduct was to so annoy and harass
15 Manwin, and to cause such harm and disruption to Manwin's brand, its public
16 image, and its business relationships, that Manwin would pay Defendants to
17 purchase the infringing Manwin Domains and cease their activities. Indeed,
18 Defendants' conduct described herein is merely the latest in an ongoing pattern of
19 conduct targeted at a variety of other entities. Since filing its Complaint, Manwin
20 has learned that Defendants have registered hundreds or thousands of infringing
21 domain names, including dozens of domain names using Manwin's trademarks.
22 Defendant Bulgin recently attempted to extort payments from the company
23 Imperial Tobacco by purchasing the domain name "imperialtobacco.co" and then
24 using fake names in order to defraud the World Intellectual Property Organization
25 ("WIPO") Arbitration Panel. The WIPO Panel found that Defendant Bulgin's
26 conduct was a "calculated scam, designed to extract from the Complainant as much
27 money for the transfer of the Domain Name as possible."

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1 10. Manwin is informed and believes, and on that basis avers, that at all
2 times relevant herein, Defendant Nicholas Bulgin is and was a resident of the State
3 of Georgia. Manwin is informed and believes, and on that basis avers, that
4 Defendant Bulgin has registered and owned hundreds of unauthorized, infringing
5 domain names, including but not limited to the infringing Manwin Domains.
6 Manwin is informed and believes, and on that basis avers, that Bulgin has used the
7 false names "Gill Manwinder," "Yi Weng," "Chris Hill,"
8 "contact@Manwinsucks.com," "Jim Jagen," and "Radishdreams."

9 11. Manwin is informed and believes, and on that basis avers, that at all
10 times relevant herein, Defendant James Martin is and was a resident of the State of
11 Florida. Manwin is informed and believes, and on that basis avers, that Defendant
12 Martin has registered and owned hundreds of unauthorized, infringing domain
13 names, including but not limited to the infringing Manwin Domains. Manwin is
14 informed and believes, and on that basis avers, that as of the date of this First
15 Amended Complaint, Martin is the holder of the infringing Manwin Domain
16 www.manwin.us. Manwin is informed and believes, and on that basis avers, that,
17 at all times relevant herein, Defendant Martin was acting in concert with Defendant
18 Bulgin. Manwin is further informed and believes, and on that basis avers, that
19 Defendant Martin and Defendant Bulgin transferred the infringing Manwin
20 Domains between each other to conceal their ownership.

21 12. Plaintiff is unaware of the true names or capacities of the Defendants
22 sued herein under the fictitious names DOES 1 through 10, inclusive. Plaintiff is
23 informed and believes, and on that basis avers, that DOES 1 through 10, and each
24 of them, either directly performed the acts alleged herein or were acting as the
25 agent, principal, alter ego, employee, representative, or otherwise participated in
26 the acts alleged herein with other Defendants. Accordingly, Defendants DOES 1
27 through 10 are each liable for all of the acts alleged herein because they were the

1 cause in fact and proximate cause of all injuries suffered by Plaintiff as alleged
2 herein. Plaintiff will amend the Complaint to state the true names of Defendants
3 DOES 1 through 10 when their identity is discovered.

4 13. Plaintiff is informed and believes, and on that basis avers, that at all
5 times relevant herein, each of the Defendants was the agent of each of the other
6 Defendants and, in doing the things averred in this First Amended Complaint, was
7 acting within the course and scope of such agency.

8
9 **PLAINTIFF AND ITS TRADEMARKS**

10 14. Manwin owns and licenses one of the largest portfolios of premium
11 adult-oriented website domain names and trademarks. Manwin's websites, which
12 include pornhub.com, youporn.com, brazzers.com, tube8.com, and webcams.com,
13 are among the most visited websites on the Internet, and millions of people
14 throughout the world visit Manwin's websites each day. In addition, under license
15 from Playboy Enterprises, Inc., Manwin operates and manages all "Playboy"
16 online content and runs Playboy Television worldwide, using the "Playboy
17 Premium Entertainment" label.

18 15. Manwin has invested millions of dollars and countless employee
19 hours to develop its reputation in the adult content industry. As a result of that
20 effort and expense, the Manwin name and those of its brands, including its brand
21 "BRAZZERS," have come to be associated in the minds of the public with high-
22 quality adult-oriented content. Accordingly, Manwin owns valid and enforceable
23 trademarks in the names "MANWIN" and "BRAZZERS," among others (the
24 "Manwin Marks"). Each of the Manwin Marks is the subject of a pending
25 trademark application before the United States Patent and Trademark Office.
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1 **DEFENDANTS AND THEIR UNLAWFUL CONDUCT**

2 16. Commencing in or about July 2011, Defendants engaged in a ruthless
3 and unrelenting campaign of unlawful and harassing conduct against Manwin and
4 its trademarks. Manwin is informed and believes, and on that basis avers, that this
5 campaign was undertaken for the express purpose of coercing Manwin to pay
6 substantial sums to Defendants to stop their unlawful conduct and to purchase a
7 number of unlawfully acquired, infringing domain names.

8 17. Manwin is informed and believes, and on that basis avers, that
9 between July and August 2011, one or more of Defendants, including Defendants
10 Bulgin and Martin, registered or acquired (or caused to be registered or acquired)
11 numerous domain names containing Manwin trademarks, including but not limited
12 to the domain names www.manwin.net, www.manwin.co,
13 www.manwinsucks.com, and www.manwin.us (the "Manwin Domains"). Each of
14 these domain names was registered by in bad faith, with the intent to trade off or
15 profit from the Manwin Marks.

16 18. Shortly after acquiring the Manwin Domains, one or more of
17 Defendants, using the alias "Chris Hill" (at e-mail address chrisH@manwin.net),
18 offered to sell the domain name www.manwin.net to Manwin for \$100,000. When
19 Manwin rejected that offer, "Chris Hill" advised Manwin that it can "kiss [my]
20 rear" and threatened to sell the domain name to another cybersquatter to "get
21 massive traffic and blow you off the #1 spot in search engines." For the following
22 three months, Defendants, acting individually or in concert, undertook a
23 coordinated campaign intended to force Manwin into purchasing the Manwin
24 Domains.

25 19. First, Manwin is informed and believes, and on that basis avers, that
26 to conceal their cybersquatting activities and defend their registrations from
27 challenge (including before a domain name arbitration under the Uniform Dispute

1 Resolution Procedure (“UDRP”)), Defendants registered and operated the
 2 infringing Manwin Domains using various aliases and fake personas. For example,
 3 Defendants re-registered the domain name www.manwin.net using the fake name
 4 “Gill Manwinder,” a purported businessman from the United Kingdom who was in
 5 the process of setting up various businesses using his family name (“Manwinder”).
 6 Similarly, Defendants registered the domain name www.manwin.co using the fake
 7 name “Yi Weng,” who purported to be a Chinese woman who maintains a weblog
 8 (“blog”) to discuss issues of spirituality and charity. In an attempt to justify use of
 9 the Manwin trademark, Defendants titled this website “ManWin – the huMAN
 10 WINDow to the Soul.”

11 20. Second, Manwin is informed and believes that to cause Manwin to
 12 believe that harm would befall Manwin and its trademarks if it failed to
 13 immediately purchase the Manwin Domains, Defendants sent fabricated e-mails
 14 between their fake personas, or to each other, with a copy to Manwin. In those e-
 15 mails, Defendants pretended these various “individuals” were communicating
 16 about collective action against Manwin. For example, on September 13, 2011,
 17 “Chris Hill” wrote an e-mail to “contact@manwinsucks.com,” purporting to
 18 suggest that Hill and the administrator of manwinsucks.com “compare notes” and
 19 take action to “dilute” the Manwin name.

20 21. Third, Manwin is informed and believes, and on that basis avers, that
 21 one or more of Defendants created a website www.manwinsucks.com to
 22 disseminate false, misleading, and defamatory statements about Manwin’s
 23 purported business practices. Among the false and defamatory statements
 24 published by on this website were the following purported “facts” about Manwin:

- 25 ● Manwin “create[s] user accounts at their free porn websites and
 26 upload[s] illegal content found all over the net that they didnt [sic] pay for.”
- 27 ● Manwin “use[s] illegal content to make money.”

1 • Manwin “own[s] a shitload or[sic] websites that are Adult oriented
2 and they push traffic to these sites using Pirate Bay....”

3 • Manwin’s websites are “a messed up scam but they like it and are
4 completely fine in using illegal tube sites that use peoples private adult videos to
5 sell their own products. If that is not a illegal scam i don’t[sic] know what is.”

6 • “Manwin...recently had assets seized by the US government since
7 they were said to be doing illegal financial schemes through the state of Georgia.”

8 Manwin is informed and believes, and on that basis avers, that Defendants
9 knew that the foregoing statements were false and misleading. Nevertheless,
10 Defendants published them with the deliberate intent to harm Manwin.

11 Specifically, Defendants’ intent in posting these defamatory statements was to
12 cause those seeking information about Manwin via search engines to instead
13 retrieve the defamatory material, along with links to Defendants’
14 “manwinsucks.com” domain name. By doing so, Defendants hoped to drive up the
15 value of their website and then sell that website to Manwin at a profit.

16 22. Third, Manwin is informed and believes, and on that basis avers, that
17 Defendants engaged in a variety of activities that were designed to interfere with
18 Manwin’s business relationships and other activities. For example:

19 (a) On or about October 18, 2011, one or more of the Defendants,
20 again using the “Gill Manwinder” name, filed a fraudulent “letter of protest,” in
21 connection with Manwin’s trademark application pending before the United States
22 Patent and Trademark Office (“USPTO”). In this “letter of protest,” “Gill
23 Manwinder” claimed that Manwin’s trademark registration would harm his
24 purported “family name” and “family started company.” Additionally, the letter
25 advised the USPTO to evaluate Manwin’s “actions as depicted on website [sic]
26 such as ManwinSucks.com. This site shows their [sic] is someone or a group who
27 opposes their company so much they created an entire website.”

1 (b) On or about August 18, 2011, a user going by the alias
2 “Radishdreams” began posting on a variety of popular websites frequented by
3 those working in the adult industry that Manwin was attempting to strongarm “Yi
4 Weng” (the purported owner) into relinquishing her domain name. Manwin is
5 informed, believes, and on that basis avers that “Radishdreams” is one or more of
6 the Defendants.

7 (c) In or about the end of 2011, after learning that Manwin was
8 engaged in litigation against ICM (the entity that controls the registry for the .xxx
9 top-level domain), one or more of the Defendants exhorted members of the public
10 to register infringing Manwin-related domain names and then re-direct those
11 domains to ICM.

12 (d) On or about August 22, 2011, using the fake name “Jim Jagen,”
13 one or more of the Defendants contacted Manwin’s business partners at Playboy
14 and accused Manwin of using “stolen property” and not “car[ing] much for the law
15 or about how things should be done.”

16 (e) On or about October 23, 2011, using the anonymous e-mail
17 address contact@manwinsucks.com, one or more of the Defendants threatened to
18 obtain and publish Manwin’s confidential and proprietary documents and financial
19 information.

20 23. In January 2012, after an extensive investigation, Manwin discovered
21 that “Gill Manwinder,” “Yi Weng,” “Chris Hill,” “contact@Manwinsucks.com,”
22 and “Jim Jagen” were all aliases of Defendant Bulgin, and that all e-mail
23 correspondence from these individuals originated from Bulgin. Upon information
24 and belief, “Radishdreams” also is Bulgin. Manwin’s investigation revealed that
25 Bulgin and the other Defendants were engaged in an elaborate scam to force
26 Manwin to purchase the Manwin Domains. Accordingly, on or about January 12,
27 2012, Manwin served Bulgin with a formal demand to cease his activity and

1 immediately transfer the Manwin Domains. Bulgin acknowledged his activities,
2 claimed that he had purchased the names in order to “secure” them for Manwin,
3 and agreed to transfer the Manwin Domains. However, a few days later, Bulgin
4 reneged on his agreement and claimed that his “associates” would not transfer the
5 domain names. And, on January 31, 2012, “Gill Manwinder” contacted Manwin,
6 demanding that Manwin pay him \$4,300 to transfer the domain name
7 www.manwin.net.

8 24. On April 5, 2012, after Manwin had served Defendant Bulgin with the
9 original complaint in this action, Bulgin insisted that the owner of the infringing
10 Manwin Domains was James Martin. Manwin is informed and believes, and on
11 that basis avers, that in fact Defendant Bulgin transferred to Defendant Martin the
12 infringing Manwin Domains www.manwin.net, www.manwin.co, and
13 www.manwinsucks.com. Manwin is also informed and believes, and on that basis
14 avers, that, as of the date of this First Amended Complaint, Defendant Martin was
15 the owner of the infringing Manwin Domain www.manwin.us. Manwin is
16 informed and believes, and on that basis avers, at all times relevant herein,
17 Defendant Martin was and was acting in concert with Defendant Bulgin.

18 25. On April 20, 2012, Manwin was contacted by another individual
19 calling himself “Gill Stevens.” This individual purported to be acting on behalf of
20 defendant Martin and transferred to Manwin the infringing Manwin Domains
21 www.manwin.net, www.manwin.co, and www.manwinsucks.com. Manwin is
22 informed and believes, and on that basis avers, that “Mr. Stevens” is a false name
23 and in fact is either Bulgin or Martin. Additionally, Mr. “Stevens” did not reveal
24 that in fact many other infringing domain names were registered to Mr. Martin but
25 were not being transferred to Manwin.

26 26. However, on or about May 15, 2012, Manwin discovered that
27 Defendants had apparently shifted their infringing and defamatory activities to

1 Twitter and Blogspot. Specifically, an individual using the handle
 2 @ManwinSucks made defamatory postings on Twitter (hereinafter the "Twitter
 3 Account"). Many of these Twitter postings, in turn, linked to one or more
 4 BlogSpot pages which feature defamatory posts about Manwin, including serious,
 5 unfounded accusations that Manwin was involved in child pornography
 6 (hereinafter the "Blogspot Pages"). Manwin is informed and believes, and on that
 7 basis avers, that Defendants are the owners and operators of the Twitter Account
 8 and Blogspot Pages.

10 **FIRST CLAIM FOR RELIEF**

11 [Violation of the Anti-Cybersquatting Act – 15 U.S.C. § 1125(d)]

12 27. Manwin realleges each and every allegation set forth in Paragraphs 1
 13 through 26, inclusive, and incorporates them by reference herein.

14 28. Manwin owns all rights in and to the Manwin Marks. The Manwin
 15 Marks are distinctive and famous.

16 29. Defendants have registered, trafficked in, and/or used the infringing
 17 Manwin Domains and Blogspot page, which are identical or confusingly similar to
 18 the Manwin Marks. Indeed, the infringing Manwin Domains and Blogspot Page
 19 each incorporate the Manwin Marks.

20 30. Defendants' use of the infringing Manwin Domains and Blogspot
 21 Page has at all times been an intentional and willful attempt to profit, in bad faith,
 22 from the Manwin Marks. Among other things, (a) Defendants have no trademark
 23 or other intellectual property rights in the Manwin Marks or the infringing Manwin
 24 Domains; (b) Defendants are not making any *bona fide* noncommercial or fair use
 25 of the Manwin Marks; (c) Defendants intend to divert traffic from the official
 26 Manwin websites, or otherwise attract users looking for information concerning
 27 Manwin; (d) the Manwin Marks are well-known marks, associated throughout the

1 world with Manwin and its websites and adult entertainment services; (e)
2 Defendants at all times knew that they do not possess any trademark, other
3 intellectual property rights, or any other rights whatsoever in the Manwin Marks,
4 and registered the infringing Manwin Domains and Blogspot Page with (and
5 despite) that knowledge.

6 31. As a direct and proximate result of Defendants' conduct, Manwin is
7 entitled to damages and to Defendants' profits in amounts to be proven at trial,
8 which are not currently ascertainable. Alternatively, Manwin is entitled to
9 maximum statutory damages of \$100,000 pursuant to 15 U.S.C. § 1117(d).

10 32. Manwin further is entitled to its attorneys' fees and costs pursuant to
11 15 U.S.C. § 1117(a).

12 33. As a result of Defendants' acts and conduct, Manwin has sustained
13 and will continue to sustain substantial, immediate, and irreparable injury, for
14 which there is no adequate remedy at law. Manwin is informed and believes, and
15 on that basis avers, that, unless enjoined and restrained by this Court, Defendants
16 will continue to infringe Manwin's valuable trademarks. Manwin is entitled to
17 temporary, preliminary, and permanent injunctive relief to restrain and enjoin
18 Defendants' continuing infringing conduct.

19 20 **SECOND CLAIM FOR RELIEF**

21 [Defamation]

22 34. Manwin realleges each and every allegation set forth in Paragraphs 1
23 through 33, inclusive, and incorporates them by reference herein.

24 35. Each of the statements made by Defendants and quoted in paragraph
25 21 above is false. Likewise, Defendants made false postings using the Twitter
26 Account and on the Blogspot page, including serious, unfounded allegations that
27 Manwin was involved in child pornography. These statements have created false

1 and defamatory impressions and, therefore, have damaged Manwin's reputation
2 and caused economic harm.

3 36. Defendants had knowledge of the statements' falsity or acted with
4 malice and/or reckless disregard for their falsity when they were made.

5 37. The defamatory statements were published on websites available
6 worldwide, including in this judicial district.

7 38. By reason of the false and defamatory statements published by
8 Defendants, Manwin has been injured in its good name, reputation and business,
9 portrayed in a false light and has been brought into disgrace and disrepute.

10 39. As a direct and proximate result of Defendants' above-described
11 defamatory publications, Manwin has sustained damages in an amount to be
12 determined at trial.

13 40. Defendants' above-described publications were done with fraud and
14 malice and were intended to cause injury to Manwin. Manwin is, therefore,
15 entitled to an award of punitive damages.

16 41. Defendants' acts have caused, and will continue to cause, irreparable
17 injury to Manwin. Manwin has no adequate remedy at law and thus is damaged in
18 an amount not yet determined.

19
20 **THIRD CLAIM FOR RELIEF**

21 [Intentional Interference with Prospective Advantage]

22 42. Manwin realleges each and every allegation set forth in Paragraphs 1
23 through 41, inclusive, and incorporates them by reference herein.

24 43. As alleged herein, Manwin has enjoyed existing business and
25 economic relations Playboy, whereby Manwin manages worldwide online content
26 under the "Playboy" trademark and runs Playboy TV, under license from Playboy
27 Enterprises, Inc.

1 44. Defendants knew of the relationship between Manwin and Playboy,
2 and intended to disrupt that relationship.

3 45. Defendants engaged in wrongful conduct by e-mailing Playboy using
4 the alias "Jim Jagen" and falsely accused Manwin of using "stolen property," and
5 not "car[ing] much for the law or about how things should be done."

6 46. Defendants' intentionally wrongful actions disrupted Manwin's
7 relationship with Playboy, and Manwin suffered harm to its reputation, in an
8 amount to be determined at trial.

9
10 **FOURTH CLAIM FOR RELIEF**

11 [Unfair Competition – Cal. Bus. & Prof. Code § 17200 and Common Law]

12 47. Manwin realleges each and every allegation set forth in Paragraphs 1
13 through 46, inclusive, and incorporates them by reference herein.

14 48. The Manwin Marks are wholly associated with Manwin due to
15 Manwin's extensive use and promotion in connection with its website and adult
16 entertainment services. Therefore, and as such, Manwin is deserving of having its
17 marks adequately protected with respect to the conduct of its business.

18 49. Based on the acts described herein, Defendants have engaged in
19 wrongful, unfair and unlawful business practices, including in violation of
20 California Business and Professions Code Section 17200 and California common
21 law.

22 50. As a result of Defendants' aforesaid conduct, Manwin has suffered
23 substantial damage and irreparable harm constituting an injury for which Manwin
24 has no adequate remedy at law. Unless this Court enjoins Defendants' conduct,
25 Manwin will continue to suffer irreparable harm. Manwin also has suffered loss of
26 profits and other damages as a result of Defendants' aforesaid conduct. On the
27

1 statutory unfair competition claim, Manwin seeks only disgorgement of profits and
2 does not seek damages at law.

3
4 **PRAYER FOR RELIEF**

5 WHEREFORE, Manwin respectfully requests judgment against Defendants
6 as follows:

7 1. Preliminarily and permanently enjoining Defendants, their agents,
8 representatives, employees, assigns and suppliers, and all persons acting in concert
9 or privity with them, from using the Manwin Marks, or the infringing Manwin
10 Domains, or any other name or mark or domain name that is likely to cause
11 confusion, to cause mistake, or to deceive with respect to Manwin's trademarks or
12 service marks, or from competing unfairly with Manwin;

13 2. Preliminarily and permanently enjoining Defendants, their agents,
14 representatives, employees, assigns and suppliers, and all persons acting in concert
15 or privity with them, from registering or using any domain name containing any of
16 Manwin's trademarks or service marks, including but not limited to the Manwin
17 Marks; from making any use of Manwin's trademarks or service marks that is
18 likely to cause confusion, to cause mistake, or to deceive; and from using any of
19 Manwin's trademarks or service marks to compete unfairly with Manwin.

20 3. Preliminarily and permanently enjoining Defendants, their agents,
21 representatives, employees, assigns and suppliers, and all persons acting in concert
22 or privity with them, from disseminating false, defamatory, or misleading
23 statements concerning Manwin, including but not limited to statements made via
24 Blogspot or Twitter.

25 4. Directing Defendants to transfer to Manwin all infringing domain
26 names, including but not limited to the domain name www.manwin.us;

27 5. Awarding Manwin statutory damages under 15 U.S.C. § 1117(d);

1 6. Awarding Manwin its damages and Defendants' profits derived by
2 reason of the unlawful acts complained of herein as provided by law;

3 7. Awarding Manwin its reasonable attorneys' fees, prejudgment
4 interest, and costs of suit as provided by law;

5 8. Such other relief as the Court may deem just and proper.

6
7 DATED: June 6, 2012

MARC E. MAYER
EMILY F. EVITT
MITCHELL SILBERBERG & KNUPP LLP

8
9
10 By: _____

Marc E. Mayer
Attorneys for Plaintiff

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury of all issues triable of right by jury.

DATED: June 6, 2012

MARC E. MAYER
EMILY F. EVITT
MITCHELL SILBERBERG & KNUPP LLP

By: 

Marc E. Mayer
Attorneys for Plaintiff