08 CV 01159

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	NECETVEN
ANDIN INTERNATIONAL, INC.	FEB 0 5 2008 JU
Plaintiff,	CIVIL ACTION NO.
$\mathbb{V}.$	ECF CASE
YURMAN STUDIO, INC.,	
Defendant.	

COMPLAINT FOR DECLARATORY JUDGMENT OF NON-COPYRIGHT INFRINGEMENT

Plaintiff Andin International, Inc. (hereinafter "Andin"), by and through its undersigned attorneys, for its Complaint against Defendant Yurman Studio, Inc. (hereinafter "Defendant Yurman"), alleges as follows:

- 1. This declaratory judgment action arises under the copyright laws of the United States, 17 U.S.C. § 101, et seq. and seeks a declaration that Andin has not infringed upon any claimed copyright rights of Defendant Yurman in its Pave Collection Enhancer D06384.
- 2. This is also an action under New York State Common Law for tortious interference with contractual relations.

JURISDICTION AND VENUE

- 3. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338 with respect to the claims arising under the Copyright Act, 17 U.S.C. §101, et seq. and pursuant to the Declaratory Judgment Act, 28 U.S.C. § 2201, et seq. Jurisdiction over the New York State Common Law claim is proper pursuant to 28 U.S.C. § 1367.
 - 4. Venue is proper in this district pursuant to 28 U.S.C. § 1391 (b) and (c)

because this is an action brought pursuant to the Copyright Act, because Defendant Yurman resides and/or conducts business in this judicial district, and because a substantial part of the events giving rise to the claims occurred in this district.

PARTIES AND FACTS COMMON TO ALL COUNTS

- 5. Andin is a corporation organized and existing under the laws of the State of New York, located and doing business at 609 Greenwich Street, New York, New York 10014.
- 6. Andin designs, manufactures, markets and distributes in the United States a wide variety of jewelry items, from rings to necklaces to pendants. Andin employs an in-house design team to create its jewelry designs, and it is a major marketer of jewelry in this country.
- 7. Defendant Yurman is a New York corporation that, upon information and belief, has an office in New York City, is doing business in this district, transacts business within this district, derives revenue from intrastate and interstate commerce, and Defendant Yurman is otherwise within the jurisdiction of this Court.
 - 8. David Yurman is the chief executive officer of Defendant Yurman.
- 9. In early 2007, Andin created a pave ring (the "Andin Ring"), an image of which is attached as Exhibit A, that was inspired by a ring, an image of which is attached as Exhibit B, which was in Andin's possession. This prior ring was in the marketplace as early as October 2006 and was marketed by a company known as Vardi Gem Lustre LLC.
- 10. The ring used by Andin as inspiration had a North/South orientation of the rectangular band that surrounded the pave field on the ring when worn on a wearer's finger (the "North/South Ring").

- 11. On information and belief, Yurman was aware that the North/South Ring was in the marketplace and took no legal action with respect thereto.
- 12. The Andin Ring was shown to customers and presented to the marketplace at the Las Vegas JCK Show in June 2007.
- 13. Subsequently, due to customers' requests, and utilizing the design of the Andin Ring, Andin created a pendant (the "Andin Pendant"), an image of which is attached as Exhibit C, and a pair of earrings (the "Andin Earrings"), an image of which is attached as Exhibit D.
- 14. On or about January 16, 2008, Andin received notice that cease and desist letters from attorneys for Defendant Yurman had previously been sent to Sam's Club/Wal-Mart, Andin's customer, alleging that the Andin Ring, as well as the Andin Pendant and the Andin Earrings, infringed Defendant Yurman's purported copyright rights in its Copyright Registration No.VA1–024-276, issued August 21, 2000, entitled Pave Collection Enhancer D06384. A copy of Copyright Registration No. VA1–024-276 is attached as Exhibit E.
- 15. The letters from Defendant Yurman's attorneys further demanded that Sam's Club/Wal-Mart immediately cease and desist all marketing and sales of the allegedly infringing Andin Ring, Andin Pendant and Andin Earrings. After receiving these letters, Sam's Club/Wal-Mart took the Andin Ring, Andin Pendant and Andin Earrings off sale.
- 16. Sam's Club/Wal-Mart was and is fully indemnified by Andin with respect to its sales of the Andin Ring, Andin Pendant and Andin Earrings. Notwithstanding this full indemnity, Sam's Club/Wal-Mart continues to hold the Andin Ring, Andin Pendant and Andin Earrings off sale.

Andin, and complained that the Andin Pendant and the Andin Earrings infringed Defendant Yurman's alleged rights in the Pave Collection Enhancer D06384. When the conversation turned to the Andin Ring, Mr. Yurman indicated that he did not have an issue with the Andin Ring and stated that the Andin Ring had been included in the cease and desist letters because of an error by Defendant Yurman's in-house counsel. Subsequently, however, counsel for Defendant Yurman maintained the position that the Andin Ring infringed Defendant Yurman's alleged rights in the Pave Collection Enhancer D06384.

COUNT I

<u>YURMAN'S PURPORTED COPYRIGHT RIGHTS IN ITS PAVE COLLECTION</u> ENHANCER D06384

- 18. Andin repeats and realleges each allegation in paragraphs 1 through 17 as if set forth in full herein.
- 19. Andin has sold and intends to continue to sell the Andin Ring to the jewelry trade.
- 20. Defendant Yurman, through its counsel, has asserted that the Andin Ring infringes its alleged copyright rights in the Pave Collection Enhancer D06384.
- 21. Sam's Club/Wal-Mart has informed Andin that in view of Defendant Yurman's demand, it has taken the Andin Ring off sale.
- 22. Andin believes and alleges that its Andin Ring does not infringe any valid copyright rights of Defendant Yurman in the Pave Collection Enhancer D06384.

- 23. Andin believes and alleges that the Andin Ring was created independently of Defendant Yurman's Pave Collection Enhancer D06384 and rather was inspired by the North/South Ring, which was already in the marketplace.
- 24. Andin believes and alleges that it had no access to Defendant Yurman's Pave Collection Enhancer D06384.
- 25. Andin believes and alleges that the Andin Ring has not been copied from and is not substantially similar to Defendant Yurman's Pave Collection Enhancer D06384.
- 26. The holding off sale by Sam's Club/Wal-Mart of the Andin Ring will cause and has caused significant financial damage to Andin.
- 27. Andin's reputation for the sale of legitimate non-infringing jewelry products has been and will be substantially harmed by Defendant Yurman's claims of copyright infringement.
- 28. In view of the foregoing, there has been and now is an actual controversy between Andin and Defendant Yurman regarding the non-infringement of Defendant Yurman's purported copyright rights in the Pave Collection Enhancer D06384.

COUNT II

DECLARATION THAT THE ANDIN PENDANT AND ANDIN EARRINGS DO NOT INFRINGE DEFENDANT YURMAN'S PURPORTED COPYRIGHT RIGHTS IN ITS PAVE COLLECTION ENHANCER D06384

- 29. Andin repeats and realleges each allegation in paragraphs 1 through 28 as if set forth in full herein.
 - 30. Andin has sold and intends to continue to sell the Andin Pendant and

Andin Earrings to the jewelry trade.

- 31. Defendant Yurman, through its counsel, has asserted that the Andin Pendant and Andin Earrings infringe its alleged copyright rights in the Pave Collection Enhancer D06384.
- 32. Sam's Club/Wal-Mart has informed Andin that in view of Defendant Yurman's demands, it has taken the Andin Pendant and Andin Earrings off sale.
- 33. Andin believes and alleges that the Andin Pendant and Andin Earrings, which were modeled on the Andin Ring, do not infringe Defendant Yurman's alleged copyright rights in the Pave Collection Enhancer D06384.
- 34. Andin believes and alleges that the Andin Pendant and Andin Earrings were created independently of Defendant Yurman's Pave Collection Enhancer D06384 and were modeled on the Andin Ring.
- 35. Andin believes and alleges that it had no access to Defendant Yurman's Pave Collection Enhancer D06384.
- 36. Andin believes and alleges that the Andin Pendant and Andin Earrings have not been copied from and are not substantially similar to Defendant Yurman's Pave Collection Enhancer D06384.
- 37. The holding off sale by Sam's Club/Wal-Mart of the Andin Pendant and Andin Earrings will cause and has caused financial damage to Andin.
- 38. Andin's reputation for the sale of legitimate non-infringing jewelry products has been and will be substantially harmed by Defendant Yurman's claims of copyright infringement.

39. In view of the foregoing, there has been and now is an actual controversy between Andin and Defendant Yurman regarding the non-infringement of Defendant Yurman's purported copyright rights in the Pave Collection Enhancer D06384.

COUNT III

TORTIOUS INTERFERENCE WITH CONTRACTUAL RELATIONS

- 40. Andin repeats and realleges each allegation in paragraphs 1 through 39 as if set forth in full herein.
- 41. This count for tortious interference with contractual relations is brought under the common law of the State of New York.
- 42. Sam's Club/Wal-Mart is a customer of Andin for the Andin Ring, Andin Pendant and Andin Earrings pursuant to various contracts, and contractual relationships exist between Andin and Sam's Club/Wal-Mart with respect to the Andin Ring, Andin Pendant and Andin Earrings.
- 43. As noted, Sam's Club/Wal-Mart has placed its inventory of the Andin Ring, Andin Pendant and Andin Earrings off sale, due its receipt of the cease and desist letters referred to in paragraph 14 hereof. This was Defendant Yurman's intention.
- 44. As a result of the aforementioned notice letters, Sam's Club/Wal-Mart is now declining and may in the future decline to sell the Andin Ring, Andin Pendant and Andin Earrings to the public.
- 45. Defendant Yurman knew or should have known of the contractual relationship between Sam's Club/Wal-Mart and Andin.
 - 46. Defendant Yurman knew or should have known that the Andin Ring,

Andin Pendant and Andin Earrings, as being sold by Sam's Club/Wal-Mart, did not infringe any of Defendant Yurman's alleged copyright rights in the Pave Collection Enhancer D06384.

- 47. As stated in paragraph 17 hereof, David Yurman of Defendant Yurman informed Ofer Azrielant of Andin that the Andin Ring was not a subject of the present controversy. Notwithstanding this position, Defendant Yurman refused to communicate this position regarding the Andin Ring to Sam's Club/Wal-Mart.
- 48. Based upon the foregoing, Defendant Yurman wrongfully interfered with contractual relationships between Andin and Sam's Club/Wal-Mart to Andin's substantial detriment.
- 49. Andin has suffered substantial financial harm and loss of reputation from Defendant Yurman's activities, in an amount not yet specifically determined.

WHEREFORE, Andin prays for a judgment against Defendant Yurman as follows:

- A. For judgment declaring that Defendant Yurman's copyright rights in the Pave Collection Enhancer D06384 are not infringed by the Andin Ring sold by Andin;
- B. For judgment declaring that Defendant Yurman's copyright rights in the Pave Collection Enhancer D06384 are not infringed by the Andin Pendant and Andin Earrings sold by Andin;
- C. Awarding Andin its damages from Defendant Yurman's wrongful acts in view of Defendant Yurman's tortious interference with Andin's contractual relationship with its customers;
 - D. Awarding Andin its costs, expenses and reasonable attorney fees as

permitted by law; and

E. Awarding Andin such other and further relief as the Court may deem just and proper.

Dated: New York, New York February 5, 2008

GOTTLIEB, RACKMAN & REISMAN, P.C.

Attorneys for Plaintiff

270 Madison Avenue, 8th Floor New York, New York 10016

Tel. (212) 684-3900

By:

George Gottlieb (GG-5761)

ggottlieb@grr.com

Marc P. Misthal (MPM-6636)

mmisthal@grr.com

EXHIBIT A



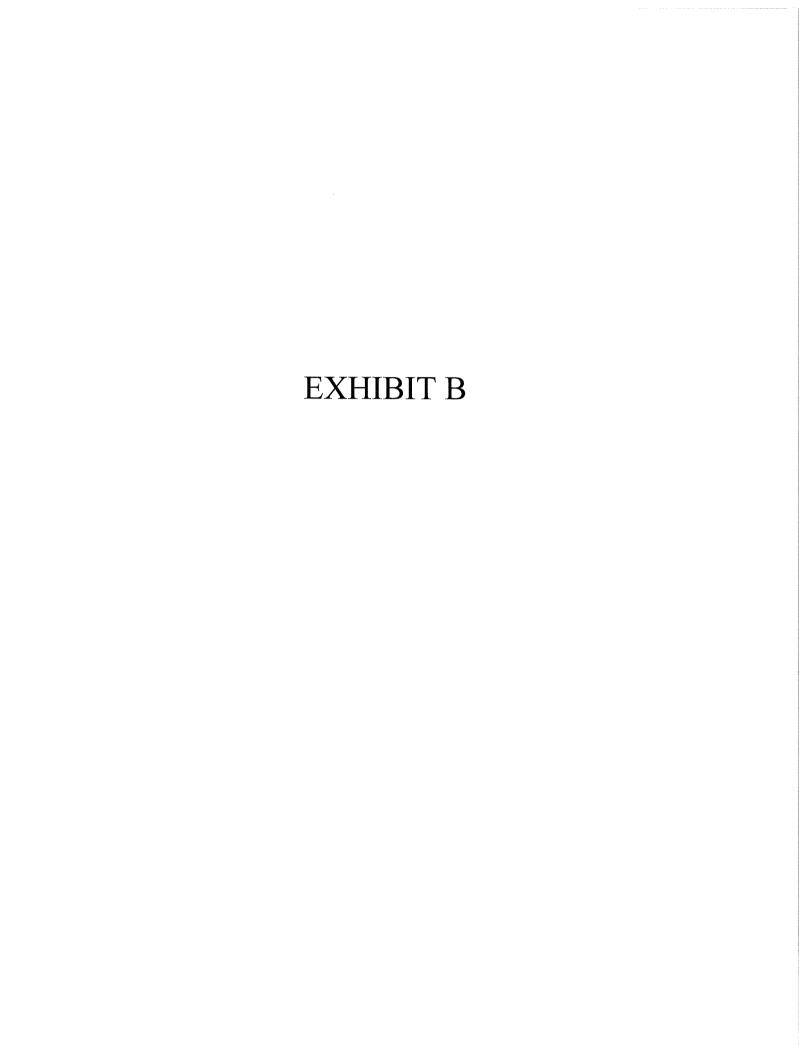






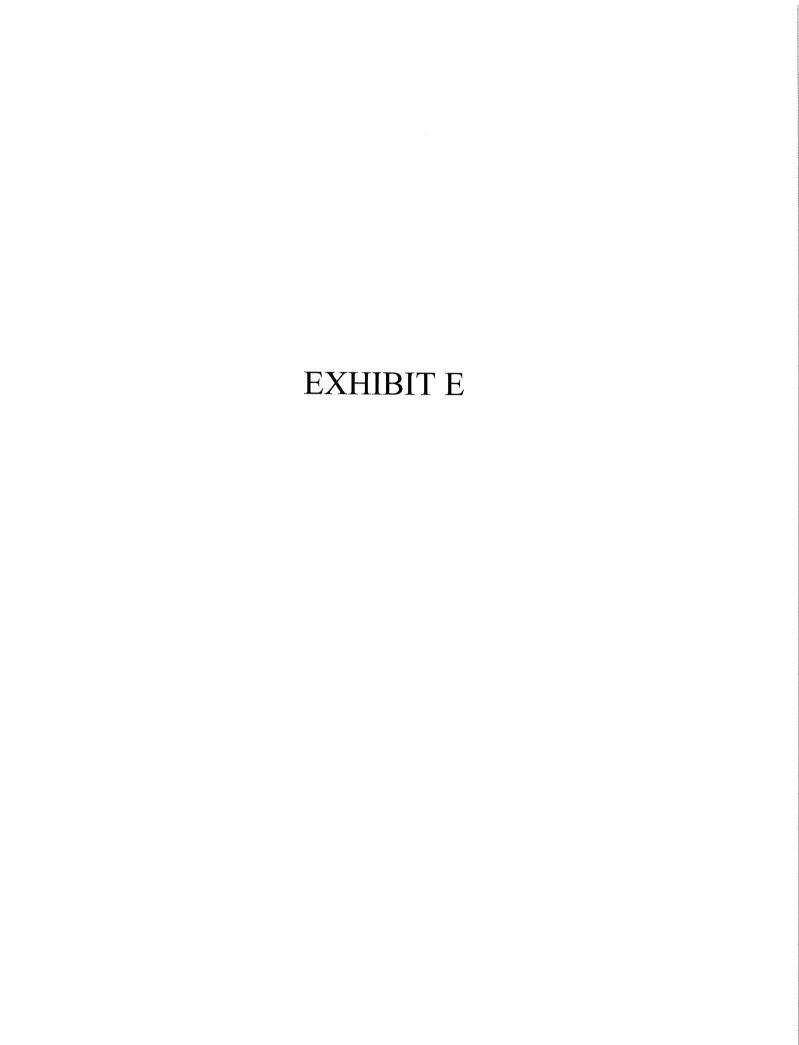
EXHIBIT C











CERTIFICATE OF REGIS. AATION





This Certificate issued under the seal of the Copyright office in accordance-with the 17. United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

EFFECTIVE QUIE OF REGISTRATION

REGISTER OF COPYRIGHTS

Aug 2000

Orric	do not write above this line if you need more of itsees seem	REFE CONTINUATION SHEET.
A	TITLE OF THIS WORK V	NATURE OF THIS WORK Y See Management
1	Pave Collection Enhancer D06384	Jewelry Design
,	PREVIOUS OR ALTERNATIVE TITLES Y	The state of the s
	Publication as a Contribution II this work was published as a coordinates to a pariedical, serial, or contribution appeared. Title of Collective Work ?	r solicains, give information about the endemive which the
	If published in a percelectal of serial give: Volumes ♥ Number ♥	State Bate A Ou baken A
2	NAME OF AUTHOR V David Yurman	DATES OF SIRTH AND DEATH Year Born V You Died V 1942
NOTE	Was this conclusion to the work's Author's Nationality or Demicile solution of Courts	Was Tale Author's Castribution to the Work Assurances O'Yes Sto
report made for his 's particly his indicately his indicately his indicate for the true one). For any art is the rest	NATURE OF AUTHORSKIP Check appropriate bodies, Son instructions O I-Observational scalegare O Map O Technics I I-Observational screens O Phospagash O Technics O Reproduction of work of an Onewelry design O Architect	
made for hive" Necti "Yes" in 1 no operio ruvidad, giva in no omptoper	NAME OF AUTHOR Y	DATES OF BIRTH AND DEATH Year Dead W
e ciaer (men tu hom tu cark as protectal) I "Adher" el un ser aca ava lles	Was this contribution to the work a Author's Machanelity or Depaidle from Country Ci Yes OR Chimn of Demanded in	Was Tale Author's Contribution to the Werk Acceptant I Yes I No State count in the Proofstynates? I Yes I No Tale or obtain
shun stern pung bern pang pengenan	NATURE OF AUTHORSHIP Check supropriors bealin), See Instructions: C 5-Dimensional accepture: C 5-Dimensional accepture: C 5-Dimensional accepture: C 7-Dimensional acc	~ .
3 a	Veur I: Which Creation of This Work Wen Complessed 2007 4 year in 66 case. Date and Kathan of First Publication of The Statements of Th	This Perdentar Work HER Perdentar Work 12 Years 1997
Æ	COPY! IGST CLAIMANT(S) Name and address quantize given room if one delicate to use states at 8 author given in march 1. T	APPLICATION RECEIVED

Yerma: Pesign Inc. 50. Maction Avenue Fan Yon: NY 10022 Transita. If one cannotes, several bose in space . In tarth different from the "America at most in open in space in starth of the supporting of America at most in open in ope ASSIGNMENT from David Yurman

MORE ON BACK >

to province 6-60 or the covers size of the sector.
• Eight are some at Each E.

DE NOT WATER HOLE

TWO DEPOSITS RECEIVED AUG 21, 2000 PUNDS RECEIVED

			CONTRACTOR OF THE PARTY OF THE	THE RESERVE TO SERVE THE PARTY OF THE PARTY
		EXAMINED BY OIA		FORM V
	,	CHECKED BY	imposition disconnection	,
	•		- Control of the Cont	
		CORRESPONDENCE	(FOR COPYRIG
	. ¹⁴			OFFICE
	, '	Security of content of the content o		ONLY
	DO HOT WRITE ABOVE THIS LINE IF YOU NEED HO	RE SPACE, USE A SEPARATE CONTINUATION SHEET.	Make the same of t	
PREVIO	UE RECUSTRATION has registration for this work, or for on entite ven the Hyper snewer is "Yex," why is another registration being sought? (Che	tion of this work, abrusty been made to the Copyright Office?		
a. O Tale	is the first published edition of a work previously reglescred in unpublished to	ere uppropriate Boz.) V		A.
b. O This	is the first application submitted by this earther as copyright claimant.	,		
a O This	is a changed various of the work, as shows by space 6 on this application.	•		-
or year core	or is "Yes." give: Freview Registration Number V	the of Registration V		
DERIVA'	TIVE WORK OR COMPILATION Complete both upper 6a and 6b & mg Material Identify any preciping work as made the deep the proof to		Altanca de	
a, Prozist	ed process security any decerning many in mouse was his made is posed a poly	or a convenies work consider only so for a compilation. A or incorporates. V		P
		•		
	•		a .	
· Adversal 4			is di	ra krabtyckoni Poka completi
- presseriei	Added to This Work Green brief, general substant of the material the has	been added to this peak and in which copyright is claimed. W	The second	a speca.
	•		ħ	
in part of the same of the		• •	Brade.	
PEFOSIT	ACCOUNT If the registration fee is to be charged to a Deposit Account of	Rabinard is the Convista Office when and and and		MENORS OF THE PERSON
ARRESTS AL	•	Account Number V		
		Specialist Language A.	*	Sec.
pposepal/Zeromenan	,	Services Landsh A	¥	
and entitle of the production		Account and American A		
ORESP	ONDENCE Give name and address so which correspondence about his as	Account and American A	·	
Joseph F	ONDENCE Give name and address to which correspondence about this ag	Account and American A	i d	
Joseph F 501 Mad	terirez/Yurman Design Inc. lison Avenue	Account and American A	a d	Ē
Joseph F 501 Mad New Yo	temirez/Yurman Design Inc. lison Avenue rk, NY 10022	Account and American A	a b	É
Joseph F 501 Mad New Yo	teminez/Yurman Design Inc. lison Avenue rk, NY 10022 daytan temphane aurbar > (212) \$96-1550	epitestien clouds be cost. Natur/Addrass/Apt/City/State/ZIP V	b	É
Joseph F 501 Mad New Yo	temirez/Yurman Design Inc. lison Avenue rk, NY 10022	epitestien clouds be cost. Natur/Addrass/Apt/City/State/ZIP V		
Joseph F 501 Mad New Yo to cate and mad by jun	temirez/Yurman Design Inc. lison Avenue rk, NY 10022 daylan temper > (212) 896-1550 mirez@davidyurman.com	epitestien clouds be cost. Natur/Addrass/Apt/City/State/ZIP V		
Joseph F 501 Mad New Yo no cests and mad by jun	teminez/Yurman Design Inc. lison Avenue rk, NY 10022 daytan temphane aurbar > (212) \$96-1550	For number > (212) 593-1597	a language b	
Joseph F 501 Mad New You so seek and mad by jra	temirez/Yurman Design Inc. lison Avenue rk, NY 10022 daylan temper > (212) 896-1550 mirez@davidyurman.com	Polication should be cont. Name/Addrons/Ap/City/State/ZIF V For number > (212) 593-1597	a languages by	£
Joseph F 501 Mad New Yo no cests and mad by jun	terrinez/Yurman Design Inc. lison Avenue rk, NY 10022 chydra templane combar > 1212 896-1550 mirez@davidyurman.com ATION* 1. the undersigned, hereby certify that I sen the	Par number > (212) 593-1597 O maker O states copyright claimant		8
Joseph F 501 Mai New Yo 50 855 856 Red P jre ERTIFIC	terrirez/Yurman Design Inc. lison Avenue rk, NY 10022 daylen templane content > 1212 896-1550 mirez@davidyurman.com ATION* 1. the undersigned, hereby certify that I am the sheet only one 3	Far sumber (212) 593-1597 Databar Copyright claimant Downer of archester tegling Databar copyright claimant Downer of archester tegling Databar copyright claimant		8
Joseph F 501 Mai New Yo 50 855 856 Red P jre ERTIFIC	terrirez/Yurman Design Inc. lison Avenue rk, NY 10022 daylen templane content > 1212 896-1550 mirez@davidyurman.com ATION* 1. the undersigned, hereby certify that I am the sheet only one 3	Far sumber (212) 593-1597 Databar Copyright claimant Downer of archester tegling Databar copyright claimant Downer of archester tegling Databar copyright claimant	20 (100 (100 (100 (100 (100 (100 (100 (1	8
Joseph F 501 Mai Now Yo TO STATE STATE ERTIFIC The work to	ternine2/Yurman Design Inc. lison Avenue rk, NY 10022 daythm temphane turner > (212) 896-1550 mirez@davidyurman.com ATION* I, the undersigned, hereby certify that I am the sheck only one > femtified is this application and that the statements made by me in this	For number > (212) 593-1597 For number > (212) 593-1597 O anchor O average of exclusive right(s) Cowner of exclusive right(s) Countertied agent of Turnian Design Inc. Name of authorized agent of a for a some of other copyright channels supplication are correct to the best of my innoviedge.	A Constitution of the Cons	8
Joseph F 501 Mai New Yo we will be just ERTIFIC. the work is	ison Avenue rk, NY 10022 daythm touchane number > (212) 896-1550 mirez@davidyurman.com ATION* I, the undersigned, hereby certify that I am the sheck only one > dentified in this application and that the statements made by me in the stantified in this application and that the statements made by me in the stantified and date V if this application gives a date of guidification in	For number > (212) 593-1597 For number > (212) 593-1597 O anchor O average of exclusive right(s) Cowner of exclusive right(s) Countertied agent of Turnian Design Inc. Name of authorized agent of a for a some of other copyright channels supplication are correct to the best of my innoviedge.	A CONTROLLERS SAN A CONTROL OF	8
Joseph I 501 Main Now You would be just the work to the work to ped or prisoned by Ramond State of the work to the work to ped or prisoned by Ramond State of the work to the	terrine2/Yurman Design Inc. lison Avenue rk, NY 10022 dayton telephone survive > (212) \$96-1550 mirez@davidyurman.com ATTON* 1. the sudersignand, hereby certify that I am the check only one > designed in this application and that the statements made by one in the stated same and date V if this application gives a date of publication in timinez.	For number > (212) 593-1597 For number > (212) 593-1597 O anchor O average of exclusive right(s) Cowner of exclusive right(s) Countertied agent of Turnian Design Inc. Name of authorized agent of a for a some of other copyright channels supplication are correct to the best of my innoviedge.	A CONTROLLERS SAN A CONTROLLERS OF THE PARTY	8
Joseph F JOI Mai Now Yo To content and THE TOPIC The work to The w	ison Avenue rk, NY 10022 daythm touchane number > (212) 896-1550 mirez@davidyurman.com ATION* I, the undersigned, hereby certify that I am the sheck only one > dentified in this application and that the statements made by me in the stantified in this application and that the statements made by me in the stantified and date V if this application gives a date of guidification in	Par number > (212) 593-1597 For number > (212) 593-1597 O assing: O action copyright claimant O owner of exclusive right(s) O authorized agent of YURTISH Design face. Name of such of the best of my knowledge. Supplication are correct to the best of my knowledge.	A CONTRACTOR OF THE CONTRACTOR	8
Joseph I 501 Main Now You would be just the work to the work to ped or prisoned by Ramond State of the work to the work to ped or prisoned by Ramond State of the work to the	terrine2/Yurman Design Inc. lison Avenue rk, NY 10022 dayton telephone survive > (212) \$96-1550 mirez@davidyurman.com ATTON* 1. the sudersignand, hereby certify that I am the check only one > designed in this application and that the statements made by one in the stated same and date V if this application gives a date of publication in timinez.	Par number > (212) 593-1597 For number > (212) 593-1597 O assing: O action copyright claimant O owner of exclusive right(s) O authorized agent of YURTISH Design face. Name of such of the best of my knowledge. Supplication are correct to the best of my knowledge.	A TOTAL CONTRACTOR OF THE PARTY	8
Joseph I Sol Main Now You are own and mail by just sent the work to ped or prisoned by the work to ped or ped or prisoned by the work to ped or pe	terrine2/Yurman Design Inc. lison Avenue rk, NY 10022 dayton telephone survive > (212) \$96-1550 mirez@davidyurman.com ATTON* 1. the sudersignand, hereby certify that I am the check only one > designed in this application and that the statements made by one in the stated same and date V if this application gives a date of publication in timinez.	Par number > (212) 593-1597 For number > (212) 593-1597 O assing: O action copyright claimant O owner of exclusive right(s) O authorized agent of YURTISH Design face. Name of such of the best of my knowledge. Supplication are correct to the best of my knowledge.	northodologica new	8
Joseph F Joseph Mac Now You work and D jrus ERTIFIC. the work is ped or prisoned by the work is work to be a period of the work is the work is the work in the work is the work in the work is the work in the work in the work is the work in the wo	ison Avenue its, NY 10022 daythm telephone number > (212) \$96-1550 mirez@davidyurman.com ATION* 1. the sudersigned, hereby certify that I am the sheek only one > dentified in this application and that the statements made by main the strated name and date V if this application gives a date of publication in timirez asterities algorithm 30 V	For number 1212) 593-1597 For number 1212) 593-1597 O statuer O statuer copyright elalmant O swater of archaster right(s) However of archaster right(s) Supplication are correct to the best of my innerviedge. Spece 1, do not sign and submit it before that date. Date July 28, 2000	PART OF THE STATE	8
Joseph I Joseph I Sol Mac Vo Sol	ison Avenue riz, NY 10022 chylina (chiphone aumbor) (212) 896-1550 mirez@da.vidyurman.com ATION* I, the undersigned, hereby certify that I am the check only one is destified in this application and that the statements made by me in the mirez arms and date V if this application gives a date of publication in timirez	Fan number (212) 593-1597 Fan number (212) 593-1597 O makes O dian copyright claimant O owner of exclusive right(s) O surherized agent of Virtuan Design Inc. Name of each or other copyright change, or some of an application are correct to the best of my innowledge. I pace 1. do not sign and submit it before that date. Date 1. July 28, 2000	PART OF THE STATE	8
Joseph I Joseph I Now You would be just said be just seed on put on the work to work to work to be just seed on put on the work to wor	ison Avenue its, NY 10022 daythm telephone number > (212) \$96-1550 mirez@davidyurman.com ATION* 1. the sudersigned, hereby certify that I am the sheek only one > dentified in this application and that the statements made by main the strated name and date V if this application gives a date of publication in timirez asterities algorithm 30 V	Far number 1 (212) 593-1597 Far number 1 (212) 593-1597 O makes O state copyright elalmant O wher of archester right(s) Here of Wilman Design Inc. Name of sures of the copyright design, or owner of archester to the best of my knowledge. Space 1, do not sign and submit it before that date. Date July 28, 2000	harmonical and the second seco	8
Joseph I Joseph I Mac New You would be just the work to ped or prisoner to be the work to be the	ison Avenue riz, NY 10022 daytina temphane number > (212) 896-1550 mirez@davidyurman.com ATION* I, the undersigned, hereby certify that I am the check only one > dentified in this application and that the statements made by me in the mirez contention of guidication in trainez contention of guidication in trainez vurman Design inc. / Joseph Ramirez have estimated.*	Fan number > 1/212) 593-1597 Fan number > 1/212) 593-1597 O makes O state copyright elalmant O switer of architekte right(s) Hears of sumer or other copyright delating, or owner of an application are correct to the best of my innoviedge. Space 1, do not sign and submit it before that date. Date > July 28, 2000	POPULATION AND ADMINISTRATION AN	9
the work to the wo	ison Avenue riz, NY 10022 daytima temphane aumbar > (212) 896-1550 mirez@da.vidyurman.com ATION* I, the undersigned, hereby certify that I am the sheck only one > dentified in this application and that the statements made by me in the mirez contention of guidication in trairez contention of guidication in trairez contention of guidication in trairez	Par number > (212) 593-1597 Far number > (212) 593-1597 O makes O steins copyright elalmant O switer of architekte right(s) Here of where of architekte right(s) a application are correct to the best of my innowledge. I pace 1, do not sign and submit it before that date. Date July 28, 2000 NOTICE I DISTILLATION IN SECTION IN SECTIO	Parameters of the second secon	Same and the same
the work to the wo	ison Avenue riz, NY 10022 daytima temphane number > (212) 896-1550 mirez@davidyurman.com ATTON* I, the undersigned, hereby certify that I am the check only one > dentified in this application and that the statements made by me in the mirez contention of guidication in the statements of guidication in thirez contention of granture 20 y Vurman Design inc. / Joseph Ramirez Name Vurman Design inc. / Joseph Ramirez Name Some Some Some 301 Madison Avenue	Fan number 1212 593-1597 Fan number 1212 593-1597 O makes O state copyright elalmant O switer of architekte right(s) Hence of survey of the copyright desired, or some of an application are correct to the best of my innoviering. Space 1, do not sign and submit it before that date. Date July 28, 2000 NORUM NO	habertanian	9
Joseph I Joseph I Sol Mac Now You are sent and mad by jung the work to the work to ped or prisocoph R: You will be like to the work to th	Som Avenue riz, NY 10022 styling temphrane number > (212) 896-1550 mirez@da vidyurman.com ATTON* I. the undersigned, hereby certify that I am the sheek only one is described in this application and that the statements made by me in the mirez and date V if this application gives a date of publication in mirez potential or signature (2) your man Design inc. / Joseph Ramires and state of substantial inc. / Joseph Ramires are signature (2) your resinceracy. Some and addison Avenue A Sana 2P V New York, NY 10022	For number > (212) 593-1597 For number > (212) 593-1597 Jacktor Jacktor Jacktor (2004) State (2004) Journal of Exclusive right(s) Journal of Exclusive right(s) Pero " number of other copying definers, or sonor of and application are correct to the best of my knowledge. Legace 1. do not sign and submit it before that date. Date July 28, 2000 Date July 28, 2000 The Control of Exclusion in special control of the post of the post of the control of the post of the	And the second s	2 Apr. 1, 100; Speri Sta 2; 1 104 . 1 10.

BLLI. GOVE-MMENT PROJUCE OPPICE 199645-17871

D06384



PAVE