

FILED

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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY _____

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**12 L.A. PRINTEX INDUSTRIES, INC., a
13 California Corporation,

14 Plaintiff,

15 vs.

16 CHARLOTTE RUSSE, INC., a California
17 Corporation; and DOES 1 through 10,

18 Defendants.

Case No.:

CV08-04793 RSWL (MAX)

PLAINTIFF'S COMPLAINT FOR:

1. COPYRIGHT
INFRINGEMENT;

AND

2. VICARIOUS AND/OR
CONTRIBUTORY COPYRIGHT
INFRINGEMENT.Jury Trial Demanded19 L.A. Printex Industries, Inc. ("Plaintiff"), by and through its undersigned
20 attorneys, hereby prays to this honorable Court for relief based on the following:21 **INTRODUCTION**22 Plaintiff is a Los Angeles based company that creates unique two-dimensional
23 graphic designs and manufactures textiles, primarily for use in the garment industry.
24 This action is brought to recover damages for direct, vicarious and contributory
25 copyright infringement arising out of the misappropriation of Plaintiff's intellectual
26 property by the above-named Defendants, and each of them.
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28

JURISDICTION AND VENUE

1
2 1. This action arises under the Copyright Act of 1976, Title 17 U.S.C., § 101
3 et seq.

4 2. This Court has federal question jurisdiction under 28 U.S.C. § 1331 and
5 1338 (a) and (b).

6 3. Venue in this judicial district is proper under 28 U.S.C. § 1391(c) and
7 1400(a) in that this is the judicial district in which a substantial part of the acts and
8 omissions giving rise to the claims occurred.

9
10 **PARTIES**

11 4. Plaintiff L.A. PRINTEX INDUSTRIES, INC. ("LAP") is a corporation
12 organized and existing under the laws of the State of California with its principal
13 place of business located at 3270 East 26th Street, Vernon, California 90023.

14 5. Plaintiff is informed and believes and thereon alleges that Defendant
15 CHARLOTTE RUSSE, INC. ("CHARLOTTE") is a corporation organized and
16 existing under the laws of the State of California and doing business in and with the
17 State of California.

18 6. Plaintiff is informed and believes and thereon alleges that some of
19 Defendants DOES 1 through 3, inclusive, are manufacturers and/or vendors of
20 garments to Defendant, which DOE Defendants have manufactured and/or supplied
21 and are manufacturing and/or supplying garments comprised of fabric printed with
22 Plaintiff's copyrighted Design Nos. **C30114**, **D40354** and **D40403** (as hereinafter
23 defined) without Plaintiff's knowledge or consent or have contributed to said
24 infringement. The true names, whether corporate, individual or otherwise of
25 Defendants DOES 1-3, inclusive, are presently unknown to Plaintiff, which therefore
26 sues said Defendants by such fictitious names and will seek leave to amend this
27 complaint to show their true names and capacities when same have been ascertained.
28

1 7. Defendants DOES 4 through 10, inclusive, are other parties not yet
2 identified who have infringed Plaintiff's copyrights, have contributed to the
3 infringement of Plaintiff's copyrights, or have engaged in one or more of the
4 wrongful practices alleged herein. The true names, whether corporate, individual or
5 otherwise, of Defendants 4 through 10, inclusive, are presently unknown to Plaintiff,
6 which therefore sues said Defendants by such fictitious names, and will seek leave to
7 amend this Complaint to show their true names and capacities when same have been
8 ascertained.

9 8. Plaintiff is informed and believes and thereon alleges that at all times
10 relevant hereto each of the Defendants was the agent, affiliate, officer, director,
11 manager, principal, alter-ego, and/or employee of the remaining Defendants and was
12 at all times acting within the scope of such agency, affiliation, alter-ego relationship
13 and/or employment; and actively participated in or subsequently ratified and
14 adopted, or both, each and all of the acts or conduct alleged, with full knowledge of
15 all the facts and circumstances, including, but not limited to, full knowledge of each
16 and every violation of Plaintiff's rights and the damages to Plaintiff proximately
17 caused thereby.

18 **CLAIMS RELATED TO DESIGN NO. C30114**

19 9. Prior to the conduct complained of herein, Plaintiff composed an original
20 two-dimensional artwork for purposes of textile printing. It allocated this design
21 Plaintiff's Internal Design Number C30114 ("Subject Design"). A true and correct
22 image of the Subject Design has been attached hereto as Exhibit One.

23 10. Plaintiff applied for and received copyright registration for the Subject
24 Design on September 23, 2005, with the Subject Design being granted the
25 assignment of Registration No. VA 1-334-155. A copy of said registration is
26 attached hereto as Exhibit Two.
27
28

1 11. Prior to the acts complained of herein, Plaintiff sampled and sold fabric
2 bearing the Subject Design to numerous parties in the fashion and apparel industries.

3 12. Following this distribution of product bearing the Subject Design,
4 Plaintiff's investigation revealed that certain entities within the fashion and apparel
5 industries had misappropriated the Subject Design, and were selling fabric and
6 garments bearing illegal reproductions and derivations of the Subject Design.

7
8 **CLAIMS RELATED TO DESIGN NO. D40354**

9 13. Prior to the conduct complained of herein, Plaintiff composed an original
10 two-dimensional artwork for purposes of textile printing. It allocated this design
11 Plaintiff's Internal Design Number D40354 ("Subject Design"). A true and correct
12 image of the Subject Design has been attached hereto as Exhibit Three.

13 14. Plaintiff applied for and received copyright registration for the Subject
14 Design on July 20, 2006, with the Subject Design being granted the assignment of
15 Registration No. VA 1-380-034. A copy of said registration is attached hereto as
16 Exhibit Four.

17 15. Prior to the acts complained of herein, Plaintiff sampled and sold fabric
18 bearing the Subject Design to numerous parties in the fashion and apparel industries.

19 16. Following this distribution of product bearing the Subject Design,
20 Plaintiff's investigation revealed that certain entities within the fashion and apparel
21 industries had misappropriated the Subject Design, and were selling fabric and
22 garments bearing illegal reproductions and derivations of the Subject Design.

23
24 **CLAIMS RELATED TO DESIGN NO. D40403**

25 17. Prior to the conduct complained of herein, Plaintiff composed an original
26 two-dimensional artwork for purposes of textile printing. It allocated this design

1 Plaintiff's Internal Design Number D40403 ("Subject Design"). A true and correct
2 image of the Subject Design has been attached hereto as Exhibit Five.

3 18. Plaintiff applied for and received copyright registration for the Subject
4 Design on December 29, 2006, with the Subject Design being granted the
5 assignment of Registration No. VA 1-394-211. A copy of said registration is
6 attached hereto as Exhibit Six.

7 19. Prior to the acts complained of herein, Plaintiff sampled and sold fabric
8 bearing the Subject Design to numerous parties in the fashion and apparel industries.
9 Following this distribution of product bearing the Subject Design, Plaintiff's
10 investigation revealed that certain entities within the fashion and apparel industries
11 had misappropriated the Subject Design, and were selling fabric and garments
12 bearing illegal reproductions and derivations of the Subject Design.

13 20. The **CHARLOTTE** Garments: Plaintiff is informed and believes and
14 thereon alleges that, without Plaintiff's authorization, CHARLOTTE, created,
15 manufactured, caused to be manufactured, imported, distributed, and/or sold fabric
16 and/or garments comprised of fabric featuring a design which is identical, or
17 substantially similar, to the Subject Design. (hereinafter "CHARLOTTE
18 Garment(s)").

19 21. Plaintiff is informed and believes and thereon alleges that the
20 CHARLOTTE Garments were created by one of the DOE 1-10 defendants, and sold
21 through CHARLOTTE retail outlets, catalogues and on-line stores. One exemplar of
22 a CHARLOTTE Garment is attached hereto as Exhibit Seven.

23 22. The CHARLOTTE Garments will be collectively referred to as "Subject
24 Garments."

25 23. Plaintiff's investigators located and purchased Subject Garments at the
26 retail stores of various Defendants. These sales by Defendants, and each of them, of
27
28

1 said garments constituted an infringement of Plaintiff's exclusive rights under 17
2 U.S.C. 106 et seq.

3 24. Plaintiff issued cease and desist letters to Defendants, and each of them,
4 and is informed and believes and thereon alleges that, in spite of their receipt of the
5 aforementioned cease and desist demand letters, Defendants, and each of them,
6 continued to sell Subject Garments in violation of Plaintiff's rights as the copyright
7 proprietor and owner of the Subject Designs.

8
9 **FIRST CLAIM FOR RELIEF**

10 (For Copyright Infringement - Against All Defendants, and Each)

11 25. Plaintiff repeats, realleges and incorporates herein by reference as though
12 fully set forth the allegations contained in Paragraphs 1 through 24, inclusive, of this
13 Complaint.

14 26. Plaintiff is informed and believes and thereon alleges that Defendants, and
15 each of them, had access to the Subject Design, including, without limitation,
16 through (a) access to Plaintiff's showroom and/or design library; (b) access to
17 illegally distributed copies of the Subject Design by third-party vendors and/or DOE
18 Defendants, including without limitation international and/or overseas converters
19 and printing mills; and (c) access to Plaintiff's strike-offs and samples.

20 27. Plaintiff is informed and believes and thereon alleges that one or more of
21 the Defendants manufactures garments and/or is a garment vendor. Plaintiff is
22 further informed and believes and thereon alleges that said Defendant(s), and each of
23 them, has an ongoing business relationship with Defendant retailers, and each of
24 them, and supplied garments to said retailers, which garments infringed the Subject
25 Design in that said garments were composed of fabric which featured unauthorized
26 print designs that were identical or substantially similar to the Subject Design, or
27 were an illegal modification thereof.

1 28. Plaintiff is informed and believes and thereon alleges that Defendants, and
2 each of them, infringed Plaintiff's copyright by creating, making and/or developing
3 directly infringing and/or derivative works from the Subject Design and by
4 producing, distributing and/or selling Subject Garments through a nationwide
5 network of retail stores, catalogues, and through on-line websites.

6 29. Due to Defendants' acts of infringement, Plaintiff has suffered substantial
7 damages to its business in an amount to be established at trial.

8 30. Due to Defendants' acts of infringement, Plaintiff has suffered general and
9 special damages in an amount to be established at trial.

10 31. Due to Defendants' acts of copyright infringement as alleged herein,
11 Defendants, and each of them, have obtained direct and indirect profits they would
12 not otherwise have realized but for their infringement of the Subject Design. As
13 such, Plaintiff is entitled to disgorgement of Defendant's profits directly and
14 indirectly attributable to Defendant's infringement of the Subject Design in an
15 amount to be established at trial.

16 32. Plaintiff is informed and believes and thereon alleges that Defendants, and
17 each of them, have continued to import, manufacture, cause to be manufactured
18 and/or sell Subject Garments after Plaintiff demanded that they cease and desist from
19 engaging in same. Therefore, Defendants' acts of copyright infringement as alleged
20 above were, and continue to be, willful, intentional and malicious, subjecting
21 Defendants, and each of them, to liability for statutory damages under Section
22 504(c)(2) of the Copyright Act in the sum of up to one hundred fifty thousand dollars
23 (\$150,000) per infringement. Further, Defendants', and each of their, willful and
24 intentional misappropriation and/or infringement of Plaintiff's copyrighted Subject
25 Design renders Defendants, and each of them, liable for statutory damages as
26 described herein. Within the time permitted by law, Plaintiff will make its election
27 between actual damages and statutory damages.

SECOND CLAIM FOR RELIEF

(For Vicarious and/or Contributory Copyright Infringement - Against All Defendants, and Each)

33.Plaintiff repeats, realleges and incorporates herein by reference as though fully set forth the allegations contained in Paragraphs 1 through 32, inclusive, of this Complaint.

34.Plaintiff is informed and believes and thereon alleges that Defendants knowingly induced, participated in, aided and abetted in and profited from the illegal reproduction and/or subsequent sales of garments featuring the Subject Design as alleged herein.

35.Plaintiff is informed and believes and thereon alleges that Defendants, and each of them, are vicariously liable for the infringement alleged herein because they had the right and ability to supervise the infringing conduct and because they had a direct financial interest in the infringing conduct.

36.By reason of the Defendants', and each of their, acts of copyright infringement as alleged above, Plaintiff has suffered and will continue to suffer substantial damages to its business in an amount to be established at trial, as well as additional general and special damages in an amount to be established at trial.

37.Due to Defendants', and each of their acts of copyright infringement as alleged herein, Defendants, and each of them, have obtained direct and indirect profits they would not otherwise have realized but for their infringement of the Subject Design. As such, Plaintiff is entitled to disgorgement of Defendants' profits directly and indirectly attributable to Defendants' infringement of the Subject Design, in an amount to be established at trial.

38.Plaintiff is informed and believes and thereon alleges that Defendants, and each of them, have continued to manufacture and/or sell Subject Garments after

1 Plaintiff demanded that they cease and desist from engaging in same. Therefore,
2 Defendants' acts of copyright infringement as alleged above were, and continue to
3 be, willful, intentional and malicious, subjecting Defendants, and each of them, to
4 liability therefore, including statutory damages under Section 504(c)(2) of the
5 Copyright Act in the sum of one hundred fifty thousand dollars (\$150,000) per
6 infringement. Further, Defendants', and each of their, willful and intentional
7 misappropriation and/or infringement of Plaintiff's copyrighted Subject Design
8 renders Defendants, and each of them, liable for statutory damages as described
9 herein. Within the time permitted by law, Plaintiff will make its election between
10 actual damages and statutory damages.

11 **PRAAYER FOR RELIEF**

12 Wherefore, Plaintiff prays for judgment as follows:

13 **Against All Defendants**

14 1. **With Respect to Each Claim for Relief**

- 15 a. That Defendants, their agents and servants be enjoined from importing,
16 manufacturing, distributing, offering for sale, selling or otherwise
17 trafficking in any product that infringes Plaintiff's copyrights in the
18 Subject Design;
- 19 b. That Plaintiff be awarded all profits of Defendants plus all losses of
20 Plaintiff, the exact sum to be proven at the time of trial, or, if elected
21 before final judgment, statutory damages as available under the
22 Copyright Act, 17 U.S.C. § 101 et seq.;
- 23 c. That Plaintiff be awarded its attorneys' fees as available under the
24 Copyright Act U.S.C. § 101 et seq.;
- 25 d. That Defendants, and each of them, account to Plaintiff for their profits
26 and any damages sustained by Plaintiff arising from the foregoing acts
27 of infringement;
- 28

- e. That Plaintiff be awarded pre-judgment interest as allowed by law;
- f. That Plaintiff be awarded the costs of this action; and
- g. That Plaintiff be awarded such further legal and equitable relief as the Court deems proper.

Plaintiff demands a jury trial on all issues so triable pursuant to Fed. R. Civ. P. 38 and the 7th Amendment to the United States Constitution.

Dated: July 17, 2008

DONIGER LAW FIRM APC

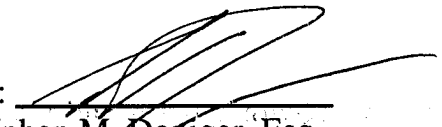
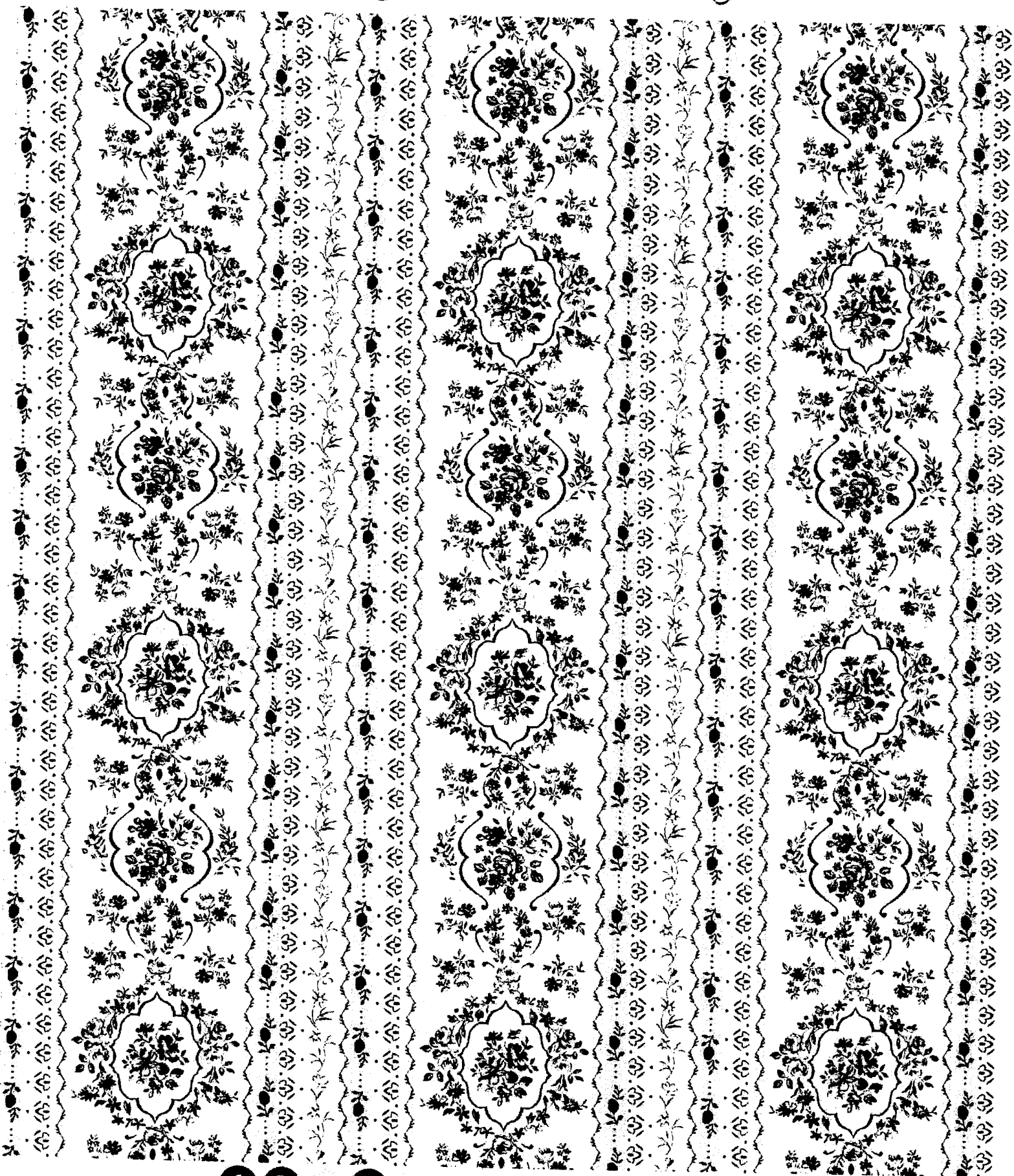
By: 
Stephen M. Doniger, Esq.
Attorneys for Plaintiff
L.A. PRINTEX INDUSTRIES, INC.

Exhibit 1



1 2 4

C30114

Exhibit 2

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 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.

Marybeth Peters

Register of Copyrights, United States of America

Form VA
For a Work of the Visual Arts
Under the Copyright Act of 1976
VA 1-334-155

EFFECTIVE DATE OF REGISTRATION

9 23 05
Month Day Year

1 **Title of This Work** ETHNIC (GROUP 10) **NATURE OF THIS WORK** TEXTILE DESIGN

Product or Alternative Title C30114, R50184

Publication as a Contribution If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work

Published in a periodical or serial Volume Number Issue Date On Page

2 **NAME OF AUTHOR** LA PRINTEX INDUSTRIES, INC. **DATES OF BIRTH AND DEATH**
Your Born Year Died

NOTE Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instruction 10). For any part of the work that was "made for hire" check "Yes" in the space provided, give the employer's name for whom the work was prepared in "Author" of that part, and leave the space for date of birth and death blank.

Was this contribution to the work a "work made for hire"? ☐ Yes ☒ No

Author's Nationality or domicile Name of Country USA Claim of Domiciled in USA

Was This Author's Contribution to the Work Anonymous? ☐ Yes ☒ No If the answer to either of these questions is "Yes," see detailed instructions.

Publication? ☐ Yes ☒ No

Feature of Authorship Check appropriate boxes (see instructions)
☐ 3-Dimensional sculpture ☐ Map ☐ Technical drawing
☒ 2-Dimensional artwork ☐ Photograph ☐ Text
☐ Reproduction of work of art ☐ Jewelry design ☐ Architectural work

3 **Name of Author** LA PRINTEX INDUSTRIES, INC. **Dates of Birth and Death**
Your Born Year Died

Was this contribution to the work a "work made for hire"? ☐ Yes ☒ No

Author's Nationality or domicile Name of Country USA Claim of Domiciled in USA

Was This Author's Contribution to the Work Anonymous? ☐ Yes ☒ No If the answer to either of these questions is "Yes," see detailed instructions.

Publication? ☐ Yes ☒ No

Feature of Authorship Check appropriate boxes (see instructions)
☐ 3-Dimensional sculpture ☐ Map ☐ Technical drawing
☒ 2-Dimensional artwork ☐ Photograph ☐ Text
☐ Reproduction of work of art ☐ Jewelry design ☐ Architectural work

4 **Year in Which Creation of This Work Was Completed** 2005 **Date and Month of First Publication of This Particular Work**
Complete this information only if the work has been published. Month AUGUST Day 31 Year 2005

COUNTRY CLAIMANT'S Name and address must be given even if the claimant is the work or the author (see instruction 10)
LA PRINTEX INDUSTRIES, INC.
3270 E. 26TH ST.
VERNON, CA 90023

APPLICATION RECEIVED
COPIES RECEIVED
TWO DEPOSITS RECEIVED
FUNDS RECEIVED

Transfer If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright.

MOVE ON BACK • Check any of applicable options (numbers 1-4) on the reverse side of this page. • See detailed instructions. • Sign the back of back.

DO NOT WRITE HERE
Page 1 of 2 pages

EXAMINED BY	STI	FORM VA
CHECKED BY		
<input type="checkbox"/> CORRESPONDENCE		FOR COPYRIGHT OFFICE USE ONLY
Yes		

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has application for this work, or for an earlier version of this work, already been made in the Copyright Office?

☐ Yes ☐ No If your answer is "Yes," why is another registration being sought? (Check appropriate box.) ☐ V

a. ☐ This is the first published edition of a work previously registered in unpublished form.

b. ☐ This is the first application submitted by the author to register a claim.

c. ☐ This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give Previous Registration Number ☐ V

Year of Registration ☐ V

DERIVATIVE WORK OR COMPILATION Complete both space 6 and 6b for a derivative work; complete only 6b for a compilation.

a. Providing Material: Identify any preexisting work or works that this work is based on or incorporates. ☐ V

b. Material Added to This Work: Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ☐ V

DEPOSIT ACCOUNT This application fee is to be deposited in a Deposit Account established in the Copyright Office; give name and number of Account.

Name ☐ V

Account Number ☐ V

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. (Name and Address of Copyright Office.) ☐ V

LA PRINTEX INDUSTRIES, INC.
3270 E. 26TH ST. VERNON, CA 90023

Area code and telephone number: 323, 269-0100

Fax number: 323, 269-0190

E-mail:

CERTIFICATION I, the undersigned, hereby certify that I am the

check only one ☐ V

☐ author

☐ other copyright claimant

☒ owner of exclusive right(s)

☐ authorized agent of

Name of author or other copyright claimant or owner of exclusive right(s)

of the work identified in this application, and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date ☐ V If this application given a date of publication in space 7, do not sign and submit it before that date.

SAR SOON, NAB

Date: AUGUST 31, 2003

Handwritten signature (SAR SOON, NAB)

Copyrights will be mailed in return for this application.

LA PRINTEX INDUSTRIES, INC.

Handwritten signature (SAR SOON, NAB)

3270 E. 26TH ST.

Copyright ©

VERNON, CA 90023

NOTE: (1) This application is subject to the provisions of the Copyright Act of 1909, as amended, and the Copyright Act of 1976, as amended, and the Copyright Regulations thereunder. (2) This application is subject to the provisions of the Copyright Act of 1909, as amended, and the Copyright Act of 1976, as amended, and the Copyright Regulations thereunder. (3) This application is subject to the provisions of the Copyright Act of 1909, as amended, and the Copyright Act of 1976, as amended, and the Copyright Regulations thereunder.

Form Copyright 2003-03/2004 1000 Form Copyright 2003-03/2004 1000 Printed on recycled paper

U.S. Government Printing Office: 2003-000-000/100,000

Exhibit 3

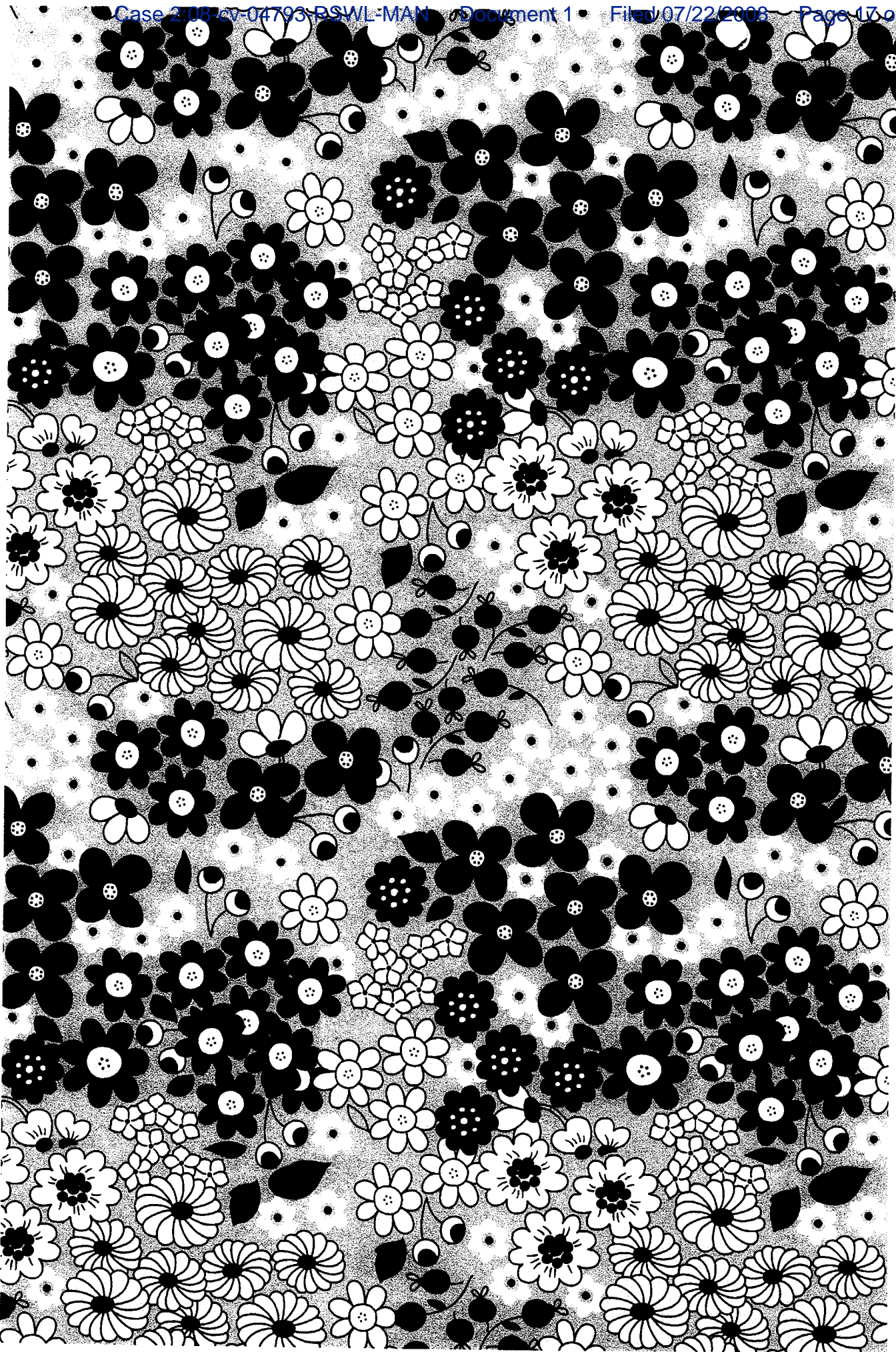


Exhibit 4

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 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.

Marybeth Peters

Register of Copyrights, United States of America



Form VA

For a Work of the Visual Arts
UNITED STATES PATENT AND TRADEMARK OFFICE

VA 1-380-034

REGISTERED

EFFECTIVE DATE OF REGISTRATION

7-20-06

RATE CONTINUATION SHEET.

1

Title of This Work ▼

LAP 06-D4

NATURE OF THIS WORK ▼ See Instructions

TEXTILE DESIGN

Previous or Alternative Titles ▼

D40347, D40348, D40349, D40350, D40351, D40352, D40353, D40354, D40355, D40356

Publication as a Contribution If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼

Number ▼

Issue Date ▼

On Page ▼

2

NAME OF AUTHOR ▼

a LA PRINTEX INDUSTRIES, INC.

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"? ☐ Yes ☐ No

Author's Nationality or Domicile
Name of Country

OR: ☐ Citizen of ☐ Domiciled in USA

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☐ No

Pseudonym? ☐ Yes ☐ No

If the answer to either of these questions is "Yes," see detailed instructions.

Nature of Authorship Check appropriate box(es). See Instructions

☐ 3-Dimensional sculpture

☐ Map

☐ Technical drawing

☐ 2-Dimensional artwork

☐ Photograph

☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

Name of Author ▼

b LA PRINTEX INDUSTRIES, INC.

Dates of Birth and Death

Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"? ☐ Yes ☐ No

Author's Nationality or Domicile
Name of Country

OR: ☐ Citizen of ☐ Domiciled in USA

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☐ No

Pseudonym? ☐ Yes ☐ No

If the answer to either of these questions is "Yes," see detailed instructions.

Nature of Authorship Check appropriate box(es). See Instructions

☐ 3-Dimensional sculpture

☐ Map

☐ Technical drawing

☐ 2-Dimensional artwork

☐ Photograph

☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

3

Year in Which Creation of This Work Was Completed

2006

This information may be given Year in all cases.

Date and Month of First Publication of This Particular Work

Complete this information ON YR this work has been published.

Month JULY

Day 15

Year 2006

USA

Nation

4

COPYRIGHT CLAIMANT(s) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

LA PRINTEX INDUSTRIES, INC.
3270 E. 26TH ST. VERNON, CA 90023

Transfer If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

APPLICATION RECEIVED

JUL 20 2006

ONE DEPOSIT RECEIVED

JUL 20 2006

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

MORE ON BACK ►

• Complete all applicable spaces (numbers 1-4) on the reverse side of this page.
• See detailed instructions.

• Sign the form at line 5.

DO NOT WRITE HERE

Page 1 of 2 pages

EXAMINED BY JAB

FORM VA

CHECKED BY JAB

CORRESPONDENCE

☐ YesFOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

☐ Yes ☐ No If your answer is "Yes," why is another registration being sought? (Check appropriate box.) ☐a. ☐ This is the first published edition of a work previously registered in unpublished form.b. ☐ This is the first application submitted by this author as copyright claimant.c. ☐ This is a changed version of the work, as shown by space 6 on this application.If your answer is "Yes," give: Previous Registration Number ☐Year of Registration ☐

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation.

a. ☐ Derivative Work Identify any preexisting work or works that this work is based on or incorporates. ☐b. ☐ Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ☐

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name ☐Account Number ☐CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/Zip ☐LA PRINTEX INDUSTRIES, INC.
3270 E. 26TH ST. VERNON, CA 90023

Area code and daytime telephone number (323) 269-0100

Fax number (323) 269-0190

Email ☐

CERTIFICATION I, the undersigned, hereby certify that I am the

check only one ☐☐ author☐ other copyright claimant☐ owner of exclusive right(s)☐ authorized agent of

Name of author or other copyright claimant, or owner of exclusive right(s)

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date ☐ If this application gives a date of publication in space 3, do not sign and submit it before that date.

JAB SOON, NAH

Date JULY 15, 2006

Handwritten signature (X) ☐x JAB SOON NAHCertificate
will be
mailed in
window
envelope
to this
address:Name ☐

LA PRINTEX INDUSTRIES, INC.

Number/Address/Apt ☐

3270 E. 26TH ST.

City/State/Zip ☐

VERNON, CA 90023

• Complete all necessary sections
• Sign your application in space 81. Application fee
2. Payment of fee by check or money
order payable to Registrar of Copyrights
3. Payment of feeLibrary of Congress
Copyright Office
101 Independence Avenue SE
Washington, DC 20540-4000

47 USC 102: Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 402, or in any written statement filed in connection with the application, shall be fined not more than \$2,000.

Exhibit 5

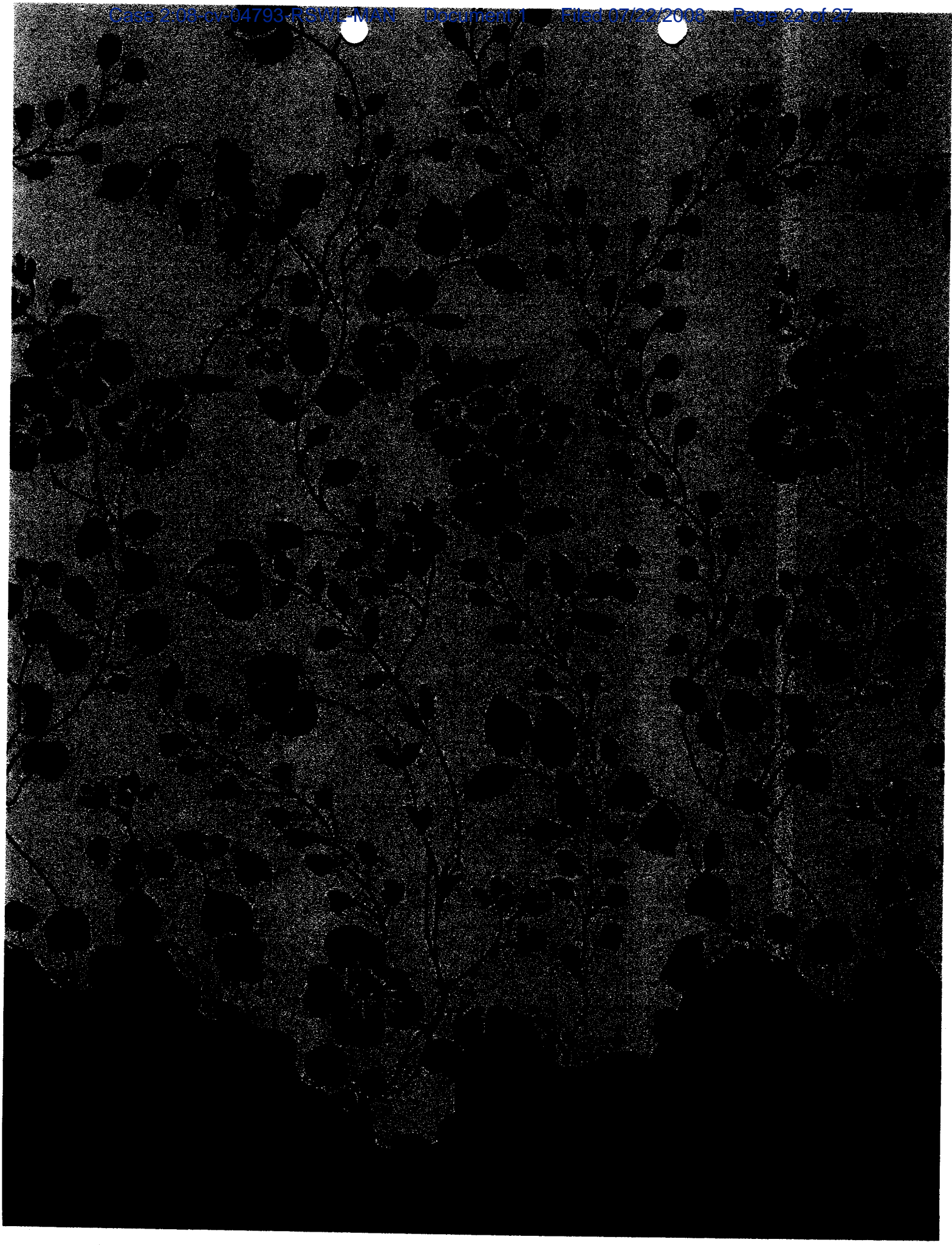


Exhibit 6



This Certificate issued under the seal of the Copyright Office in accordance with title 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.

Marybeth Peters

Register of Copyrights, United States of America

Form VA
 For a Work of the Visual Arts
 UNITED STATES COPYRIGHT OFFICE

REGS. VA 1-394-211
 [Barcode]

EFFE. 12-29-06
 Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE USE A SEPARATE CONTINUATION SHEET

1

Title of This Work

LAP 06-D11

NATURE OF THIS WORK See Instructions

TEXTILE DESIGN

Previous or Alternative Titles

D40403 D40407 D40408 D40409 D40411 D40418 D40430

Publication as a Contribution If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work

If published in a periodical or serial give Volume

Number

Issue Date

On Pages

2

NAME OF AUTHOR

a BLUE STUDIO

DATES OF BIRTH AND DEATH

Year Born

Year Died

Was this contribution to the work a "work made for hire"?

☐ Yes

☐ No

Author's Nationality or Domicile

Name of Country

OR Cause of

Domiciled in ITALY

Was This Author's Contribution to the Work

Anonymous?

☐ Yes ☐ No

Pseudonymous?

☐ Yes ☐ No

If the answer to either of these questions is "Yes" see detailed instructions

Nature of Authorship Check appropriate box(es) See Instructions

☐ 3 Dimensional sculpture

☐ Map

☐ Technical drawing

☒ 2 Dimensional artwork

☐ Photograph

☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

Name of Author

b LA PRINTEX INDUSTRIES INC

Date of Birth and Death

Year Born

Year Died

Was this contribution to the work a "work made for hire"?

☐ Yes

☐ No

Author's Nationality or Domicile

Name of Country

OR Cause of

Domiciled in USA

Was This Author's Contribution to the Work

Anonymous?

☐ Yes ☐ No

Pseudonymous?

☐ Yes ☐ No

If the answer to either of these questions is "Yes" see detailed instructions

Nature of Authorship Check appropriate box(es) See Instructions

☐ 3 Dimensional sculpture

☐ Map

☐ Technical drawing

☒ 2 Dimensional artwork

☐ Photograph

☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

3

a

Year in Which Creation of This Work Was Completed

2006

This information must be given

Year in all cases.

b

Date and Place of First Publication of This Work

Complete this information ONLY if this work has been published.

Month

NOVEMBER

Day

30

Year

2006

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2.

LA PRINTEX INDUSTRIES INC

3270 E 26TH ST VERNON CA 90023

Transfer If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright.

BY WRITTEN CONTRACT

APPROPRIATION RECEIVED

DEC 29 2006

ONE DEPOSIT RECEIVED

DEC 29 2006

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

MORE ON BACK

Complete all applicable spaces (numbers 5-6) on the reverse side of this page. See detailed instructions. Sign the form at line 8.

DO NOT WRITE HERE
 Page 1 of 2 pages

EXAMINED BY

RLH

FORM VA

CHECKED BY

CORRESPONDENCE

☐ YesFOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE IF YOU NEED MORE SPACE USE A SEPARATE CONTINUATION SHEET

PREVIOUS REGISTRATION Has registration for this work or for an earlier version of this work already been made in the Copyright Office?

☐ Yes ☐ No If your answer is Yes why is another registration being sought? (Check appropriate box) ▾a. ☐ This is the first published edition of a work previously registered in unpublished formb. ☐ This is the first application submitted by this author as copyright claimantc. ☐ This is a changed version of the work as shown by space 6 on this application

If your answer is Yes give Previous Registration Number ▾

Year of Registration ▾

5

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work complete only 6b for a compilation

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates ▾

6

a

See instructions
before completing
this space

b. Material Added to This Work Give a brief general statement of the material that has been added to this work and in which copyright is claimed ▾

b

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office give name and number of Account
Name ▾ Account Number ▾

7

a

CORRESPONDENCE Give name and address to which correspondence about this application should be sent Name/Address/Apt/City/State/Zip ▾

b

LA PRINTEX INDUSTRIES INC
3270 E 26TH ST VERNON CA 90023

Area code and daytime telephone number (323) 269 0100

Fax number (323) 269 0190

Email

CERTIFICATION* I the undersigned hereby certify that I am the

check only one ▸

- ☐ author
☐ other copyright claimant
☒ owner of exclusive right(s)
☐ authorized agent of

Name of author or other copyright claimant or owner of exclusive right(s) ▾

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge

8

Typed or printed name and date ▾ If this application gives a date of publication in space 3 do not sign and submit it before that date

JAE SOON NAH

Date DECEMBER 18 2006

Handwritten signature (X) ▾

X

Certificate
will be
mailed in
window
envelope to
this
address

Name ▾
 LA PRINTEX INDUSTRIES INC
 Number/Street/Apt ▾
 3270 E 26TH ST
 City/State/ZIP ▾
 VERNON CA 90023

Complete all necessary spaces
Sign your application in space 8

1. Application form
 2. Nonrefundable filing fee in check or money
 order payable to Registrar of Copyrights
 3. Deposit material

Library of Congress
 Copyright Office
 101 Independence Avenue SE
 Washington DC 20540-6000

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Exhibit 7



D40403