

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JUDGE CASEY

-----X  
GALBRAITH & PAUL, INC.,

Plaintiff,

v.

TARGET CORPORATION, and  
PEKING HANDICRAFT, INC.,

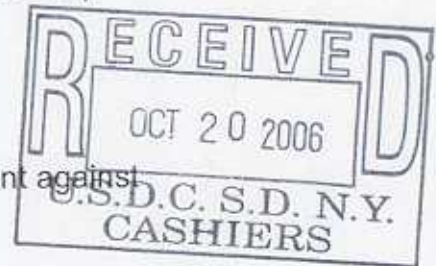
Defendants  
-----X

**06 CV 10177**

Civil Action No.

COMPLAINT

(JURY DEMANDED)



Plaintiff Galbraith & Paul, Inc., by its attorneys, for its Complaint against  
Defendant Target Corporation, alleges as follows:

JURISDICTION AND VENUE

1. This complaint alleges causes of action for copyright infringement under the Copyright Laws of the United States, 17 U.S.C. §101 et seq.
2. This Court has subject matter jurisdiction in this action pursuant to 28 U.S.C. §1331.
3. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b)-(d) and 1400(a).

THE PARTIES

4. Plaintiff Galbraith & Paul, Inc. (hereinafter "Plaintiff" or "G&P") is a corporation organized and existing under the laws of the State of Pennsylvania.
5. G&P is a well known designer of original textile products which are sold throughout the United States and the world. G&P conducts a significant amount of its business in this judicial district.

6. Upon information and belief, Defendant Target Corporation (hereinafter "Target") is a Minnesota corporation with its headquarters located at 1000 Nicollet Mall, Minneapolis, Minnesota 55403.

7. Upon information and belief, Defendant Target sells many different products, including the products at issue herein, in stores that it operates throughout the United States, including stores in New York.

8. Upon information and belief, Defendant Target operates at least one retail store in this judicial district.

9. Upon information and belief, Defendant Target has conducted business and otherwise sold said products in this judicial district .

10. Upon information and belief, Defendant Peking Handicraft, Inc. (hereinafter "PHI") is a corporation of the State of California with offices at 1388 San Mateo Avenue, South San Francisco, CA 94080 and in New York, New York, and otherwise carries out business activities in this district.

**COUNT I**  
**(COPYRIGHT INFRINGEMENT )**

11. This cause of action arises under the Copyright Laws of the United States, Title 17 United States Code Sec. 101 et seq.

12. One of G&P's popular designs is a design that G&P identifies as "Hive" (hereinafter "G&P's Hive design"). G&P's Hive design has achieved significant notoriety. A copy of the Hive design is attached hereto as **Exhibit A**.



13. G&P's Hive design consists of material which is wholly original and is copyrightable subject matter under the Copyright Laws of the United States, 17 U.S.C. Sec. 101, et seq.

14. G&P has previously duly complied with the provisions of the Copyright Laws of the United States, and has secured rights and privileges in and to its Hive design, and has duly requested from the Register of Copyrights a Certificate of Registration pertaining to said design, identified as, "Hive", Copyright Registration VA 1-260-943. A copy of said issued Certificate of Copyright Registration is attached hereto as **Exhibit B.**

15. All copies of G&P's Hive design have been sold and/or used in conformity with the provisions of the Copyright Laws of the United States.

16. Upon information and belief, Defendant Target obtained genuine products utilizing G&P Hive design, from retailers carrying G&P's products.

17. Upon information and belief, Defendant Target having full knowledge of the copyright rights of G&P in the Hive design as alleged herein, have infringed the aforesaid copyright of G&P by manufacturing, importing, publishing, displaying, vending, distributing, selling, promoting and/or advertising sheets containing substantial material copied from G&P's Hive design. A photograph of one example of such a sheet imported and sold by the Defendant Target and advertised on the Target website is attached hereto as **Exhibit C.**

18. All of the acts of Defendant Target as set forth in the preceding paragraph, were undertaken without the permission, license, or consent of G&P, and

are irreparably damaging G&P.

19. Upon information and belief, the activities of Defendant Target have diminished and will continue to diminish the inherent value and marketability of G&P's Hive design.

20. G&P has been damaged by the acts of the Defendant as alleged in this Court, in an amount as yet unknown, but if continued will be in excess of \$500,00.00.

## COUNT II

### (COPYRIGHT INFRINGEMENT)

21. This cause of action arises under the Copyright Laws of the United States Title 17 United States Code Sec. 101 et seq.

22. Another of G&P's popular designs is a design that G&P identifies as "Valise" (hereinafter "G&P's Valise design"). G&P's Valise design has achieved significant notoriety. A copy of the Valise design is attached hereto as **Exhibit D**.

23. G&P's Valise design consists of material which is wholly original and is copyrightable subject matter under the Copyright Laws of the United States, 17 U.S.C. Sec. 101, et seq.

24. G&P has previously duly complied with the provisions of the Copyright Laws of the United States, and has secured rights and privileges in and to its Valise design, and has duly requested from the Register of Copyrights a Certificate of Registration pertaining to said design, identified as, "Valise", Copyright Registration VA 1-



351-140. A copy of said issued Certificate of Copyright Registration is attached hereto as **Exhibit E**.

25. All copies of G&P's Valise design have been sold and/or used in conformity with the provisions of the Copyright Laws of the United States.

26. Upon information and belief, Defendant Target obtained genuine products utilizing G&P's Valise design, from retailers carrying G&P's products.

27. Upon information and belief, Defendant Target having full knowledge of the copyright rights of G&P in the Valise design as alleged herein, have infringed the aforesaid copyright of G&P by manufacturing, importing, publishing, displaying, vending, distributing, selling, promoting and/or advertising pillows containing substantial material copied from G&P's Valise design. A photograph of one example of such a product imported and sold by the Defendant Target is attached hereto as **Exhibit F**.

28. All of the acts of Defendant Target as set forth in the preceding paragraph, were undertaken without the permission, license, or consent of G&P, and are irreparably damaging G&P.

29. Upon information and belief, the activities of Defendant Target have diminished and will continue to diminish the inherent value and marketability of G&P's Valise design.

30. G&P has been damaged by the acts of the Defendant Target as alleged in this Court, in an amount as yet unknown, but if continued will be in excess of \$500,00.00.

**COUNT III**

**(COPYRIGHT INFRINGEMENT)**

31. This cause of action arises under the Copyright Laws of the United States Title 17 United States Code Sec. 101 et seq.

32. As noted above, one of G&P's popular designs is a design that G&P identifies as "Valise" (hereinafter "G&P's Valise design"). G&P's Valise design has achieved significant notoriety. A copy of the Valise design is attached hereto as **Exhibit D.**

33. G&P's Valise design consists of material which is wholly original and is copyrightable subject matter under the Copyright Laws of the United States, 17 U.S.C. Sec. 101, et seq.

34. G&P has previously duly complied with the provisions of the Copyright Laws of the United States, and has secured rights and privileges in and to its Valise design, and has duly requested from the Register of Copyrights a Certificate of Registration pertaining to said design, identified as, "Valise", Copyright Registration VA 1-351-140. A copy of said issued Certificate of Copyright Registration is attached hereto as **Exhibit E.**

35. All copies of G&P's Valise design have been sold and/or used in conformity with the provisions of the Copyright Laws of the United States.

36. Upon information and belief, Defendant PHI having full knowledge of the copyright rights of G&P in the Valise design as alleged herein, have infringed the aforesaid copyright of G&P by manufacturing, importing, publishing, displaying, vending, distributing, selling, promoting and/or advertising pillows containing substantial



material copied from G&P's Valise design. A photograph of one example of such a product imported and sold by the Defendant PHI is attached hereto as **Exhibit F**.

37. All of the acts of Defendant PHI as set forth in the preceding paragraph, were undertaken without the permission, license, or consent of G&P, and are irreparably damaging G&P.

38. Upon information and belief, Defendant PHI has imported and sold the infringing pillows to Defendant Target.

39. Upon information and belief, the activities of Defendant PHI have diminished and will continue to diminish the inherent value and marketability of G&P's Valise design.

40. G&P has been damaged by the acts of the Defendant PHI as alleged in this Court, in an amount as yet unknown, but if continued will be in excess of \$500,00.00.

WHEREFORE, Plaintiff demands:

A. That Defendants, their agents, servants, related companies, and all parties in privity with them, or any one of them, be enjoined preliminarily and permanently from infringing the copyright of Plaintiff either by selling, advertising, manufacturing, illustrating, publishing, displaying, vending, distributing, offering to sell, shipping, delivering, or promoting products that are substantially similar to Plaintiff's Hive design;

B. That Defendants, their agents, servants, related companies, and all

parties in privity with them, or any one of them, be enjoined preliminarily and permanently from infringing the copyright of Plaintiff either by selling, advertising, manufacturing, illustrating, publishing, displaying, vending, distributing, offering to sell, shipping, delivering, or promoting products that are substantially similar to Plaintiff's Valise design

C. That Defendants be required to deliver up to be impounded during the pendency of this action all infringing copies of Plaintiff's said copyrighted items in the possession or under the control of said Defendants.

D. That Defendants be required to pay to Plaintiff such damages as Plaintiff has sustained in consequence of Defendant's willful infringement of Plaintiff's copyrights.

E. That Defendants pay to Plaintiff the costs of this action and Plaintiff's reasonable attorneys' fees, as the court may allow Plaintiff.



F. That Plaintiff has such other and further relief as the Court may deem just.

JURY DEMAND

Plaintiff demands a trial by jury.

**GOTTLIEB, RACKMAN & REISMAN, P.C.**

Attorneys for Plaintiff

270 Madison Avenue, 8<sup>th</sup> Floor

New York, New York 10016-0601

(212) 684-3900

By: 

George Gottlieb (GG 5761)

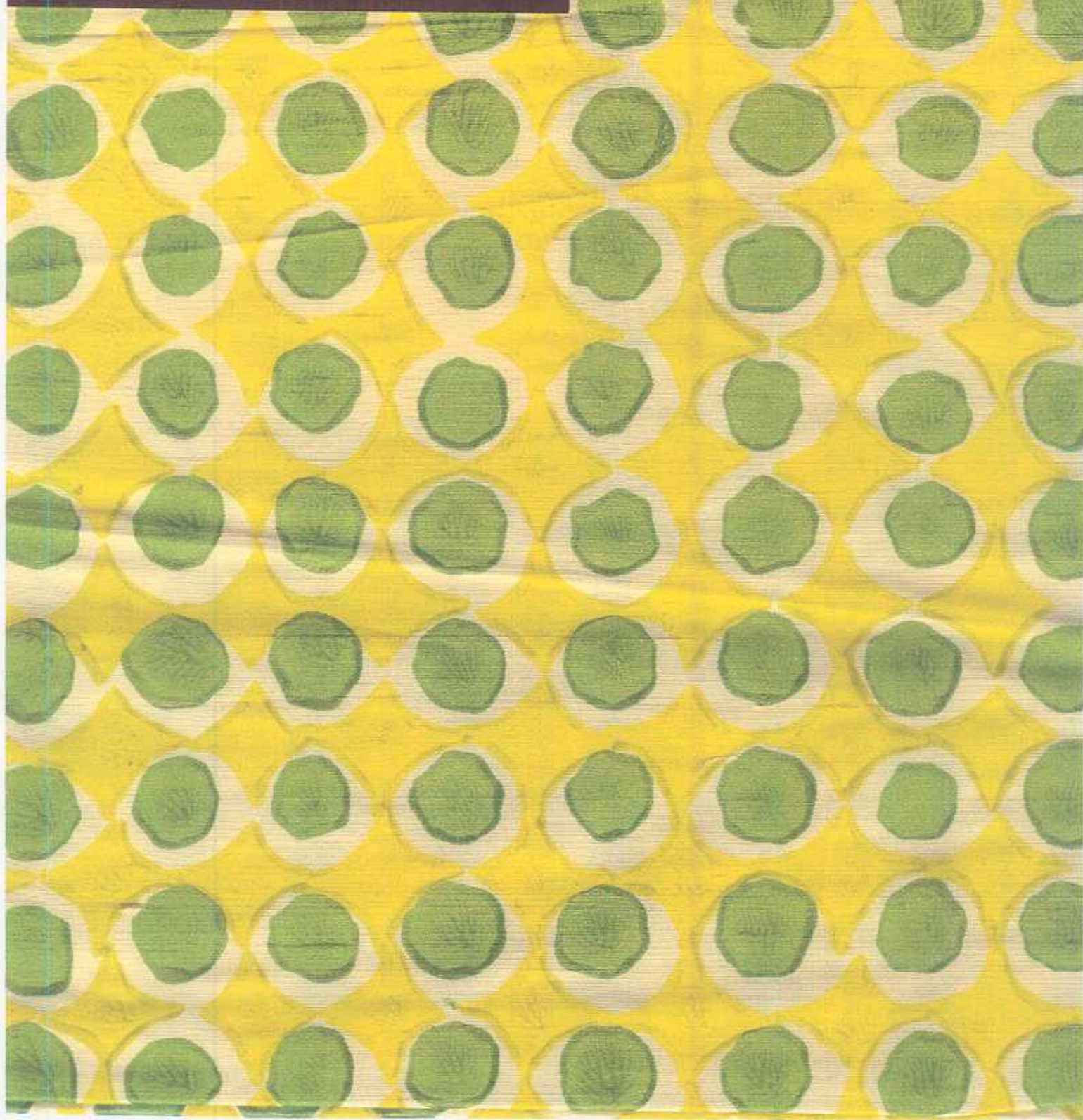
Richard Schurin (RS 0199)

Dated: New York, New York  
October 18, 2006

**“EXHIBIT A”**

# Galbraith & Paul

Lighting + Textiles



GALBRAITH & PAUL, INC.

• HIVE



**“EXHIBIT B”**

# 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

VA 1-260-943



EFFECTIVE DATE OF REGISTRATION

Month MAR Day 26 Year 2004

LATE CONTINUATION SHEET.

**1** Title of This Work Hive NATURE OF THIS WORK Textile Design

Previous or Alternative Titles

Publication as a Contribution: If this work was published as a contribution in 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 Galbraith & Paul Inc DATES OF BIRTH AND DEATH

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

☒ Yes  
☐ No

Author's Nationality or Domicile

Name of Country USA  
OR Citizen of USA  
Domiciled in

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☒ No  
Pseudonymous? ☐ Yes ☒ No

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

Dates of Birth and Death  
Year Born Year Died

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

☐ Yes  
☐ No

Author's Nationality or Domicile

Name of Country  
OR Citizen of  
Domiciled in

Was This Author's Contribution to the Work

Anonymous? ☐ Yes ☒ No  
Pseudonymous? ☐ Yes ☒ No

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 a 2004 Date and Nation of First Publication of This Particular Work

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

Galbraith & Paul Inc. 116 Shurs Ln.  
Phila., PA 19127

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

MAR 26 2004

ONE DEPOSIT RECEIVED

TWO DEPOSITS RECEIVED

MAR 26 2004

FUNDS RECEIVED

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

DO NOT WRITE HERE  
OFFICE USE ONLY  
Page 1 of 2 pages



EXAMINED BY

FORM VA

CHECKED BY

☐ CORRESPONDENCE

Yes

FOR  
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 ▼

5

DERIVATIVE WORKS OR COMPILATIONS 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 ▼

Ephraim Paul  
Galbraith & Paul116 Shurs Ln.  
Phila., PA 19127

b

Area code and daytime telephone number (215) 508-0800

Fax number (215) 508-0866

E-mail ep@galbraithandpaul.com

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)

Galbraith &amp; Paul, Inc.

8

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.

Ephraim Paul, Treasurer

Date 3/24/04

Handwritten signature (X) ▼

X

Certificate  
will be  
mailed in  
window  
envelope  
to this  
address:

Name ▼

Galbraith &amp; Paul

Number/Street/Apt ▼

116 Shurs Lane

City/State/ZIP ▼

Philadelphia PA 19127

• Complete all necessary spaces  
• Sign your application in space 81. Application form  
2. Nonrefundable filing fee in check or money  
order payable to Register of Copyrights  
3. Deposit materialLibrary of Congress  
Copyright Office  
101 Independence Avenue, S.E.  
Washington, D.C. 20559-6000Form can be ordered to  
change. For current  
form, check the  
Copyright Office  
website at  
www.copyright.gov  
with the Copyright  
Office, or call  
800-771-0700.

9



**“EXHIBIT C”**

GLOBAL

home



queen  
sheet set

ipanema  
100% cotton

DW 14 0056

MH 111B06

ON SHEET SET PRINTED GREEN CIRCLE



P109613  
CNP:38 C411239012 SFC:148 7112

Items:  
Chute:  
Wave:



CART

MY ACCOUNT

REDCARDS

HELP

HOME & LIVING | KIDS | BED & BATH | FURNITURE | PATIO & GARDEN | SPORTS & TOYS | ELECTRONICS & ENTERTAINMENT

WOMEN'S CLOTHING | MEN'S CLOTHING | BABY | HOME DECOR | GARDEN & OUTDOOR | TOYS & GAMES | VIDEO & MUSIC | BOOKS & MEDIA

Women - Men - Baby - Kids - Home - Bed & Bath - Furniture - Patio & Garden - Sports - Toys - Electronics - Entertainment

Can we help you find something? **Search**

All Products **GO**

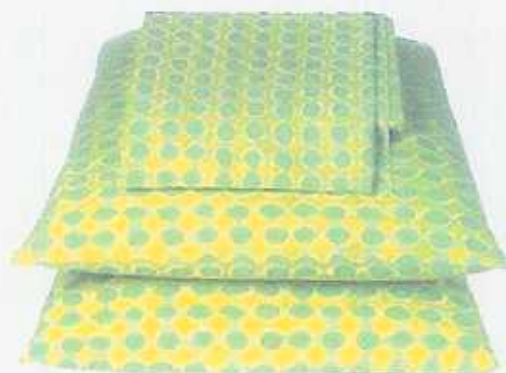
**Shop All Departments**

### Browse Similar Items

All Sheets

Print

Ipanema



## Ipanema Print Sheet Set - Green Circle

**\$29.99 - \$39.99**

King: \$39.99

**0** **ADD TO CART**

Quantity: 1

**ADD TO CART**

Sign-in for 1-Click

**1** **ADD TO CART**

**2** **ADD TO CART**

**3** **ADD TO CART**

**VIEW LARGER IMAGE**

**VIEW COLLECTION**

**Availability :**

Usually ships within 1 to 2 days.

- 220-thread-count weave set includes flat and fitted sheets and pillowcases with a funky green circle print
- Part of the Ipanema Bedding Collection
- Made of 100% cotton
- Machine wash

### Guest Reviews

Write an online review and share your thoughts with other guests.

### The REDcards



- > Apply for a Card
- > Target Business Card



### Help

- > Shipping Rates + Policies
- > Track an Order
- > Update an Order
- > Return an Item
- > Product Rebates
- > Product Recalls
- > Contact Us
- > Shopping Directory
- More>



### Target Stores

- > Store Locator
- > Grocery Coupons
- > Photo Center
- > Portrait Studio
- > Weekly Ad
- > Optical
- > Pharmacy
- > Promotions
- More>



**“EXHIBIT D”**

# Galbraith & Paul

Lighting + Textiles

GALBRAITH & PAUL, INC.

**“EXHIBIT E”**



## 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

VA 1-351-140



EFFECTIVE DATE OF REGISTRATION

2-10-06

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

1

Title of This Work

"Valise"

NATURE OF THE WORK See instructions

Textile Design

Previous or Alternative Title

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 Galbraith & Paul 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

Country

USA

OR

Citizen of

Domiciled in

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

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

Country

OR

Citizen of

Domiciled in

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

Year in Which Creation of This Work Was Completed

a 2004

This information must be given in all cases.

Date and Nation of First Publication of This Particular Work

b Complete this information only if the work has been published.

May 27, 2004

USA

2004

4

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

Galbraith & Paul Inc.

116 Shores Lane  
Phila, PA 19127

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

FEB 10 2006

ONE DEPOSIT RECEIVED

TWO DEPOSITS RECEIVED

FEB 10 2006

FUNDS RECEIVED

WORK ON BACK

• Completion of application requires payment of fee 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 <i>John</i>	FORM VA
CHECKED BY <i>John</i>	
<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 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 a further 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

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

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

7

**CORRESPONDENCE** Give name and address to which correspondence about this application should be sent. (Name/Address/Apt/City/State/ZIP)

Ephraim Paul  
Galbraith & Paul Inc.

116 Shurs Lane  
Phila., PA 19127

Area code and daytime telephone number (215) 509-0800

Fax number (215) 509-0866

Postal

**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 Galbraith & Paul Inc.

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.

Ephraim Paul, Treasurer

Date February 9, 2006

Handwritten signature (X) *Ephraim Paul*

Certificate will be mailed in window envelope to this address:

Name Galbraith & Paul Inc.  
Address 116 Shurs Lane  
City/State/ZIP Philadelphia, PA 19127

Complete all necessary steps - Sign your application in space 6

1. Application fees  
2. Recordation filing fee in check or money order payable to Registrar of Copyrights  
3. Deposit material  
Library of Congress  
Copyright Office  
101 Independence Avenue, S.E.  
Washington, D.C. 20540-0000

9

U.S.C. § 109: Any person who knowingly makes a false representation of a material fact in this application for copyright registration provided for by section 408, or in any written statement filed in connection with the application, shall be fined not more than \$10,000.

**“EXHIBIT F”**





TARGET CORPORATION  
VALISE



UNDER PENALTY OF LAW  
THIS TAG NOT TO BE REMOVED  
EXCEPT BY THE CONSUMER

ALL NEW MATERIAL  
CONSISTING OF  
95% WATERFOWL FEATHER  
AND 5% WATERFOWL DOWN  
CONTENTS STERILIZED

REG. NO. CA39211 (CN)  
PERMIT NO. PA9775

CERTIFICATION IS MADE BY THE  
MANUFACTURER THAT THE MATERIALS IN  
THIS ARTICLE ARE DESCRIBED IN  
ACCORDANCE WITH LAW

MADE BY  
PEKING HANDICRAFT, INC.  
1388 SAN MATEO AVENUE,  
SOUTH SAN FRANCISCO, CA 94080 USA

DATE OF DELIVERY: NOV, 2005  
ITEM NO: 99PHS33804C2416  
ITEM SIZE: 16"x16"  
ITEM WEIGHT: 22.40OZ/1.4LB  
ITEM RN: 17730

MADE IN CHINA

FABRIC CONTENT  
PILLOW COVER: 100% POLYESTER  
INSERT SHELL: 100% COTTON  
INSERT FILL: 95% FEATHER, 5% DOWN

MADE IN CHINA

RN#17730

VN#1146772

CARE INSTRUCTION

PILLOW COVER: MACHINE WASH COOL  
GENTLE CYCLE  
TUMBLE DRY LOW  
ONLY NON CHLORINE BLEACH  
WHEN NEEDED

PILLOW INSERT: SPOT CLEAN

GLOBAL  
BAZAAR

ASIA

\$19.99  
236-02-0009

TARGET CORPORATION  
VALISE

236 0210309 10396408-V  
Distributed by Target Corporation  
Minneapolis, MN 55403  
Made in China  
©2005 Target Brands, Inc.  
All Rights Reserved  
Shop Target.com

\$19.99



4 92360 20309 0

**STRIPE PILLOW**

16 in x 16 in (40.6 cm x 40.6 cm)

**TARGET CORPORATION**

**VALISE**