

FROSS ZELNICK LEHRMAN & ZISSU, P.C.

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07 CV 2316

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

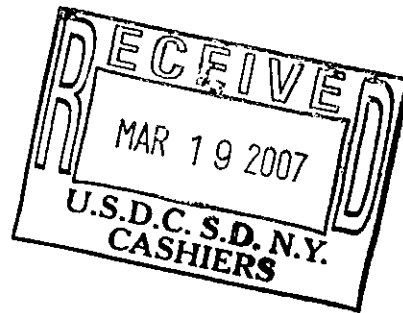
KAM HING ENTERPRISES, INC.,

Plaintiff,

--against--

WAL-MART STORES, INC.

Defendants.



COMPLAINT

Plaintiff, Kam Hing Enterprises, Inc. ("Kam Hing" or "plaintiff"), by its attorneys, Fross Zelnick Lehrman & Zissu, P.C., for its complaint against defendant Wal-Mart Stores, Inc. ("defendant" or "Wal-Mart"), alleges:

NATURE OF THE ACTION

1. Plaintiff Kam Hing, through its subsidiary Sunham Home Fashions, LLC (collectively hereinafter "Kam Hing"), is one of the largest importers of bedding products in the United States. Formed in 1974 to import and sell table linens from China, Kam Hing has since concentrated on the manufacture, importation and sale of top-of-the-bed bedding products such

as quilts, comforters, duvets and sheets. Kam Hing is now widely considered an industry leader in this area. Kam Hing's top-of-the-bed bedding products are for sale throughout the United States in nearly every major retail store; including Macy's, Bed Bath & Beyond, Kohl's, Target, JCPenny and Sears, among others.

2. In or around July 2004 Kam Hing created its Clarissa Quilt, a multi-colored quilt with a stitched patchwork design combining several print fabrics (the "Clarissa Quilt Design"). Since its introduction of the Clarissa Quilt, Kam Hing has also sold a sham featuring the same design. Kam Hing has sold hundreds of thousands of dollars of products bearing the Clarissa Quilt Design. Kam Hing owns a federal registration for the Clarissa Quilt Design, which it obtained on February 12, 2007. A copy of the registration is attached as Exhibit A.

3. All of the claims asserted herein arise out of and are based on defendant's manufacture, importation, distribution, advertising and sale of quilts that copy Ham King's copyrighted Clarissa Quilt Design. Plaintiff sues for copyright infringement under the Copyright Act of 1976 (the "Copyright Act"), 17 U.S.C. § 101 et seq. Plaintiff seeks to permanently enjoin defendants' use of the Clarissa Quilt Design, including the sale by defendants of quilts and other bedding products bearing the Clarissa Quilt Design. Plaintiff also seeks damages and an award of defendant's profits generated from their infringing activities.

JURISDICTION AND VENUE

4. Jurisdiction over plaintiff's claim under the Copyright Act is based upon Section 501 of the Copyright Act, 17 U.S.C. §501 and 28 U.S.C. § 1331 and 1338(a).

5. Venue arises under 28 U.S.C. § 1391(b), and 1400(a), because plaintiff is located in the Southern District of New York, a substantial part of the events giving rise to the claim

occurred in the Southern District of New York and defendants have substantial contacts with Southern District of New York and, on information and belief, their products, including their products that infringe plaintiff's copyright as set forth herein, may be found in the Southern District of New York. On further information and belief, defendant Wal-Mart operates several retail stores in the Southern District of New York, including a retail location at 275 Main Street, White Plains, New York 10601. A list of Wal-Mart's retail locations in the New York area is attached as Exhibit B.

PARTIES

6. Kam Hing is a New York corporation with a principal place of business at 308 Fifth Avenue, New York, New York 10001.

7. Wal-Mart is an Arkansas company with a principal place of business at 702 S.W. Street, Bentonville, Arkansas 72716 and thousands of retail locations throughout the United States, including a retail store at 275 Main Street, White Plains, New York 10601. Wal-Mart manufactures, imports and distributes bedding and other home furnishings and sells these products in its retail stores.

FACTS COMMON TO ALL CLAIMS FOR RELIEF

Plaintiff's Ownership of Rights Under Copyright in the Clarissa Quilt Design

8. In or around July 2004, Kam Hing created the Clarissa Quilt, a photograph of which is attached hereto as Exhibit C. The Clarissa Quilt Design is comprised of square patches of varied fabric prints, stitched together in a grid pattern, with a single print border around the entire patchwork. The patchwork grid is comprised of seven different alternating fabric prints. They include a multicolored flower print on an off-white background; a green and off-white

flower print; a print of off-white leaves on a green background; a print of light blue leaves on a vine over a lighter blue background; a repeated red rose-bud and green leaf and vine print on an off-white background; a green, pink, and yellow plaid print; and a blue and beige plaid print.

The blue and beige plaid print fabric is also used as a border that frames the entire patchwork at edges of the quilt. Kam Hing has sold the Clarissa Quilt since 2004 and continues to offer it for sale. The Clarissa Quilt has long been a top-selling product of Kam Hing.

10. Kam Hing owns a U.S. Registration No. VA 1-394-928 for the Clarissa Quilt Design, which issued on February 12, 2007. A copy of the registration is attached as Exhibit A.

11. The copyrighted Clarissa Quilt Design is wholly original to Kam Hing, and Kam Hing is the exclusive owner of all right, title and interest, including all rights under copyright, in and to the Clarissa Quilt Design.

The Unlawful Activities of Defendant Wal-Mart

12. On information and belief, defendant Wal-Mart, or a third party at Wal-Mart's instruction or request, without the authorization, consent or knowledge of plaintiff, and without any remuneration to plaintiff, obtained physical possession of or otherwise viewed plaintiff's original Clarissa Quilt Design, and copied and reproduced the design in a Quilt Set (hereinafter, the "Infringing Product"). The Infringing Product, Wal-Mart's "Morning Dew" Quilt Set, includes a quilt and pillow shams and is sold under Wal-Mart's MAINSTAYS mark.¹ Attached hereto as Exhibit D is a photograph of the Infringing Product and a product insert sold with and depicting the Infringing Product.

¹ Wal-Mart owns United States Trademark Registration No. 2,801,263 for the mark MAINSTAYS for use in connection with bed linens and other goods.

13. As can be seen from viewing Exhibit D, the Infringing Product is identical or nearly identical in design to the Clarissa Quilt Design. Like plaintiff's Clarissa Quilt, defendant's quilt and pillow shams feature a patchwork grid of four-by-four inch squares of varied fabric, framed by a print fabric border. Like the Clarissa Quilt Design, the Infringing Product's patchwork grid is comprised of seven different alternating fabric prints. Each individual fabric print in the Infringing Product is nearly identical to a corresponding print in Kam Hing's Clarissa Quilt Design. Like Kam Hing's copyrighted design, the Infringing Product incorporates a multicolored flower print on an off-white background; a green and off-white flower print; a print of off-white leaves on a green background; a print of light blue leaves on a vine over a lighter blue background; a repeated red rose-bud and green leaf and vine print on an off-white background; a green, pink, and yellow plaid print; and a blue and beige plaid print that is also used as the fabric border framing the entire patchwork at the edges of the quilt. The Infringing Product is indistinguishable from Kam Hing's Clarissa Quilt in overall appearance.

14. On information and belief, Wal-Mart is manufacturing or causing to be manufactured, importing, distributing, advertising and selling the Infringing Product, including through its retail stores in New York. On information and belief, Wal-Mart only recently commenced offering the Infringing Product for sale to retailers and to the general public, long after plaintiff created the Clarissa Quilt Design and began offering it for sale.

15. As a result of Wal-Mart's actions described above, plaintiff has been directly damaged, and is continuing to be damaged, by the unauthorized use and distribution of the Infringing Product.

16. Wal-Mart has never accounted to or otherwise paid plaintiff for their use of the Clarissa Quilt Design, including the reproduction, importation, distribution and sale, of the Infringing Product.

FIRST CLAIM FOR RELIEF -
FEDERAL COPYRIGHT INFRINGEMENT
(17 U.S.C. § 501)

17. Plaintiff repeats and realleges each of the allegations set forth in paragraphs 1-16 above.

18. The Clarissa Quilt Design is an original work of visual art containing copyrightable subject matter for which copyright protection exists under the Copyright Act, 17 U.S.C. § 101, et seq. Plaintiff is the exclusive owner of rights under copyright in and to the Clarissa Quilt Design. Plaintiff owns a valid federal copyright registration for the Clarissa Quilt Design, attached as Exhibit A hereto.

19. Defendant has designed, manufactured or caused to be manufactured, imported or caused to be imported, distributed or caused to be distributed and/or sold bedding products embodying a copy of the Clarissa Quilt Design without authority or consent from plaintiff as alleged above, thereby infringing plaintiff's exclusive rights under copyright in violation of Section 501 of the Copyright Act, 17 U.S.C. § 501.

20. On information and belief, defendant designed, manufactured or caused to be manufactured, imported or caused to be imported, distributed or caused to be distributed and/or sold the Infringing Product without authority or consent from plaintiff as alleged above, thereby infringing plaintiff's exclusive rights under copyright in violation of Section 501 of the Copyright Act, 17 U.S.C. § 501.

21. Defendant's infringement of plaintiff's rights under copyright is knowing and willful, has caused plaintiff damage, and has enabled defendants illegally to obtain profit therefrom.

22. Defendant's conduct has caused and will continue to cause irreparable injury to plaintiff unless enjoined by this Court. Plaintiff has no adequate remedy at law.

WHEREFORE, plaintiff demands judgment against defendants as follows:

A. That defendant, and its officers, directors, servants, employees, agents, licensees, attorneys, successors, affiliates, parents, subsidiaries and assigns, and any and all persons in active concert or participation with them who receive notice of such judgment, directly or otherwise, be temporarily, preliminarily and permanently enjoined from:

(i) infringing plaintiff's Clarissa Quilt Design, including without limitation by manufacturing, importing, distributing, advertising, promoting and/or selling the Infringing Product or any other materials embodying copies of the Clarissa Quilt Design or that are substantially similar to the Clarissa Quilt Design;

(ii) assisting or authorizing any third party to engage in any of the actions prohibited by paragraph (i) above;

B. That defendant be ordered to deliver up for destruction all materials in their possession or control, including without limitation all remaining inventory of the Infringing Product and any works that embody any reproduction or other copy or colorable imitation of the Clarissa Quilt Design, as well as all means for manufacturing them;

C. That defendant, at their own expense, be directed to recall from any distributors, retailers, vendors or others to whom they have distributed the Infringing Product and any other

materials that include, copy, are derived from or otherwise embody the Clarissa Quilt Design, and that defendant destroy or deliver up to plaintiff for destruction all materials returned to them;

D. That plaintiff recover from defendant all damages sustained by plaintiff, in consequence of defendant's copyright infringement described above, together with appropriate interest on such damages;

E. That defendant be ordered to account to plaintiff and to pay plaintiff for all the gains, profits, savings, and advantages realized by defendant from its acts of copyright infringement described above;

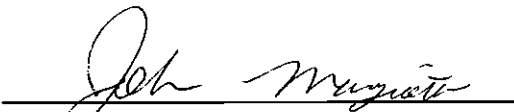
F. That, should plaintiff so elect, it be awarded statutory damages within the provisions of Section 504(c) of the Copyright Act, 17 U.S.C. § 504(c), instead of an award of actual damages or profits;

G. That plaintiff be awarded its full costs, including, as part of such costs, reasonable attorney's fees pursuant to 17 U.S.C. § 505; and

H. That plaintiff be granted such other and further relief as may be equitable and just.

Dated: New York, NY
March 19, 2007

FROSS ZELNICK LEHRMAN & ZISSU, P.C.

By: 

John P. Margiotta (JM 7356)
Michael Chiappetta (MC 7644)
Aimee Allen (AA 1092)
866 United Nations Plaza
New York, NY 10017
(212) 813-5900
Attorneys for Plaintiff
Kam Hing Enterprises, Inc.

EXHIBIT A



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 1-394-928



EFFECTIVE DATE OF REGISTRATION

2 . 12 . 07
Month Day Year

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

1

Title of This Work ▼

NATURE OF THIS WORK ▼ See Instructions

CLARISSA

DESIGN ON TEXTILE FABRIC

Previous or Alternative Titles ▼

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 ▼

DATES OF BIRTH AND DEATH

a KAM HING ENTERPRISES INC

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

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
Name of 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

2004

This information must be given in all cases.

Date and Nation of First Publication of This Particular Work

Complete this information ONLY if this work has been published.

Month 7 Day 28 Year 2004

UNITED STATES

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. ▼

KAM HING ENTERPRISES INC
308 FIFTH AVENUE
NEW YORK NY 10001

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 12 2007

ONE DEPOSIT RECEIVED

FEB 12 2007

TWO DEPOSITS RECEIVED

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

Page 1 of 2 pages

*Amended by C.O. from phone call
to Steven Leib on March 14, 2007.

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 ▼

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. ▼

* pre-existing fabric

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. ▼

* new patched artwork design

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 ▼

SUNHAM HOME FASHIONS

DA 92762

a

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

SUNHAM HOME FASHIONS

700 CENTRAL AVE

NEW PROVIDENCE, NJ 07974

ATT: STEVEN LEIB

Area code and daytime telephone number (908) 363-1100 EXT 127

Fax number (908) 363-1111

Email

STEVENLEIB@SUNHAM.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 KAM HING ENTERPRISES INC

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

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.

STEVEN LEIB

Date 2/9/07

Handwritten signature (X) ▼

X

Certificate
will be
mailed in
window
envelope
to this
address:

Name ▼

SUNHAM HOME FASHIONS

Number/Street/Apt ▼

700 CENTRAL AVENUE

City/State/Zip ▼

NEW PROVIDENCE NJ 07974

• Complete all necessary spaces
• Sign your application in space 9

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

Library of Congress
Copyright Office
101 Independence Avenue SE
Washington, DC 20540-8000


*17 USC §506(e). Any person who knowingly makes a false representation of a material fact in the 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 \$2,500.

EXHIBIT B


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FOR
FIND
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FIND IT AT YOUR STORE



More Choices, More Control

[Free Sample >](#)



Two Ways to Beat Heartburn

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STORE FINDER

Search Results

We found 20 stores near new york, NY :

1. Secaucus, NJ 07094
2. Kearny, NJ 07032
3. Saddle Brook, NJ 07663
4. Valley Stream (Li), NY 11581
5. Linden, NJ 07036
6. Union, NJ 07083
7. Woodbridge, NJ 07095
8. Westbury (Li), NY 11590
9. Uniondale, NY 11553
10. Watchung, NJ 07069
11. East Meadow, NY 11554
12. Old Bridge, NJ 08857
13. White Plains, NY 10601
14. Riverdale, NJ 07457
15. Cedar Knolls, NJ 07927
16. Boonton, NJ 07005
17. Piscataway, NJ 08854
18. Airmont, NY 10901
19. North Brunswick, NJ 08902
20. Neptune, NJ 07753



ZOOM IN

ZOOM

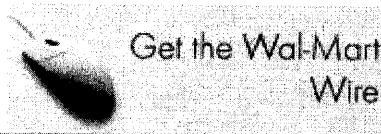
Please note: Store hours are subject to change. Please contact the store for their current hours of operation.

Store Name and Address	Distance	Hours	Other
1. Wal-Mart Store #3520 400 Park Place Secaucus, NJ 07094 (201) 325-9280	5.59 miles		<ul style="list-style-type: none"> • Store Details • Directions • View Advertised Va for this store.

2. Wal-Mart Store #5447 150 Harrison Ave Kearny, NJ 07032 (201) 955-0280	7.61 miles	<ul style="list-style-type: none">• Store Details• Directions• View Advertised Va for this store.
3. Wal-Mart Store #3562 189 Route 46 West Saddle Brook, NJ 07663 (201) 226-0575	12.99 miles	<ul style="list-style-type: none">• Store Details• Directions• View Advertised Va for this store.
4. Wal-Mart Store #5293 77 Green Acres Road Valley Stream (Li), NY 11581 (516) 887-0127	14.67 miles	<ul style="list-style-type: none">• Store Details• Directions• View Advertised Va for this store.
5. Wal-Mart Store #3469 1601 West Edgar Road Linden, NJ 07036 (908) 474-9055	15.48 miles	<ul style="list-style-type: none">• Store Details• Directions• View Advertised Va for this store.
6. Wal-Mart Store #3292 900 Springfield Road Union, NJ 07083 (908) 624-0644	16.18 miles	<ul style="list-style-type: none">• Store Details• Directions• View Advertised Va for this store.
7. Wal-Mart Store #5281 306 Us Highway 9 North Woodbridge, NJ 07095 (732) 826-4652	20.24 miles	<ul style="list-style-type: none">• Store Details• Directions• View Advertised Va for this store.
8. Wal-Mart Store #3420 1220 Old Country Road Westbury (Li), NY 11590 (516) 794-7280	20.47 miles	<ul style="list-style-type: none">• Store Details• Directions• View Advertised Va for this store.
9. Wal-Mart Store #2583 1123 Jerusalem Avenue Uniondale, NY 11553 (516) 505-1508	21.89 miles	<ul style="list-style-type: none">• Store Details• Directions• View Advertised Va for this store.
10. Wal-Mart Store #5111 1501 Route 22 West Watchung, NJ 07069 (908) 756-1925	23.07 miles	<ul style="list-style-type: none">• Store Details• Directions• View Advertised Va for this store.
11. Wal-Mart Store #2916 2465 Hempstead Turnpike East Meadow, NY 11554 (516) 579-3307	23.60 miles	<ul style="list-style-type: none">• Store Details• Directions• View Advertised Va for this store.

12. Wal-Mart Store #2825 1126 Route 9 Old Bridge, NJ 08857 (732) 525-8030	24.59 miles	<ul style="list-style-type: none">• Store Details• Directions• View Advertised Va for this store.
13. Wal-Mart Store #3441 275 Main Street White Plains, NY 10601 (914) 285-1070	24.76 miles	<ul style="list-style-type: none">• Store Details• Directions• View Advertised Va for this store.
14. Wal-Mart Store #3443 48 Route 23 North Riverdale, NJ 07457 (973) 835-5812	24.81 miles	<ul style="list-style-type: none">• Store Details• Directions• View Advertised Va for this store.
15. Wal-Mart Store #3598 235 Ridgedale Avenue Cedar Knolls, NJ 07927 (973) 889-8646	24.85 miles	<ul style="list-style-type: none">• Store Details• Directions• View Advertised Va for this store.
16. Wal-Mart Store #5077 300 Wootton Street Boonton, NJ 07005 (973) 299-3943	25.03 miles	<ul style="list-style-type: none">• Store Details• Directions• View Advertised Va for this store.
17. Wal-Mart Store #2633 1303 Centennial Ave. Piscataway, NJ 08854 (732) 562-1771	26.22 miles	<ul style="list-style-type: none">• Store Details• Directions• View Advertised Va for this store.
18. Wal-Mart Store #2905 250 Rt 59 Airmont, NY 10901 (845) 368-4705	27.71 miles	<ul style="list-style-type: none">• Store Details• Directions• View Advertised Va for this store.
19. Wal-Mart Store #2003 979 Route#1 South North Brunswick, NJ 08902 (732) 545-4499	30.16 miles	<ul style="list-style-type: none">• Store Details• Directions• View Advertised Va for this store.
20. Wal-Mart Store #5142 3575 Route 66 West Neptune, NJ 07753 (732) 922-8084	34.66 miles	<ul style="list-style-type: none">• Store Details• Directions• View Advertised Va for this store.

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Your email address will never be sold to a third party.

Do you have questions?

Please [contact us](#), and a knowledgeable Customer Service Associate will be happy to help you. We're happy to serve you 24 hours a day, 7 days a week!

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- [Track Your Order](#)
- [Questions About Your Order](#)
- [Shipping Costs & Times](#)
- [Our Return Policy](#)
- [Return an Item](#)
- [Product Recall Info](#)
- [MSDS](#)

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ndc-www89.walmart.com
/storeLocator/ca_storefinder_results.do
/storeLocator/ca_storefinder_results.jsp

EXHIBIT C









UNDER PENALTY OF LAW
THIS TAG MAY NOT BE REMOVED
EXCEPT BY THE CONSUMER
CONFORME À LA LOI CETTE ÉTIQUETTE
NE PEUT ÊTRE ENLEVÉE QUE PAR
LE CONSOMMATEUR

ALL NEW MATERIAL CONSISTING OF
100% POLYESTER
CET ARTICLE CONTIENT UNIQUEMENT
100% POLY

REG. NO. PA-24262(RC)

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

THIS LABEL IS AFFIXED IN COMPLIANCE
WITH PROVINCIAL LAW
CETTE ÉTIQUETTE EST APPOSÉE
CONFORMÉMENT À LA LOI DE LA PROVINCE

IMPORTED BY FABRIQUE PAR
SUNHAM HOME FASHIONS
308 5TH AVE NY, NY 10001

REG. NO. NO. DE PERMIS
RN 82817 CA 05T-04401

MADE IN CHINA FABRIQUE EN CHINE

CONTENT CONTENU
50% COTTON HOUSSE 50% COTON,
50% POLYESTER COVER, 50% POLY
100% POLY FILL REMBOURRAGE 100% POLY

SIZE GRANDEUR
104"x56" 264x218CM

DATE OF DELIVERY:

**50% Cotton / 50% Polyester Cover,
100% Polyester Fill**

**Housse 50% Coton / 50% Poly,
Rembourrage 100% Poly**

Machine Wash Cold, Delicate Cycle,

Do Not Bleach, For best results, line dry,

or Tumble Dry Low Heat, Remove Promptly

**Lavar à la machine en eau froide au cycle délicat, Ne
blanchissez pas. Ligne sèche ou sécher par culburage
à basse température. Retirer rapidement.**

Made in China RN82817

EXHIBIT D

mainSTAYS™
home



Decorative items used as photo props not included.

Quilt Set

Quilt and standard pillow shams

60% cotton/40% polyester
Cotton Rich

Morning Dew

FULL/QUEEN







FRONT & BACK FABRIC:

60% COTTON 40% POLYESTER

FILLING:

100% POLYESTER

**Marketed by Wal-Mart Stores, Inc.
Bentonville, AR 72716**

mainSTAYS®
home

**WAL-MART STORES, INC.
BENTONVILLE, AR 72716**

Date of Delivery:
Finished Size: 86" X 90"
Federal RN# 52469

Made in China

MACHINE WASH COLD. DO NOT
BLEACH. TUMBLE DRY. IF THERE IS NOT
FREE MOVEMENT IN THE WASHER OR
DRYER, USE LARGE CAPACITY
COMMERCIAL MACHINE.

LAVADO A MÁQUINA CON
AGUA FRÍA. NO UTILIZE BLANQUEADOR.
SECADO A MÁQUINA. SI NO EXISTE
SUFICIENTE ESPACIO EN LA LAVADORA O
SECADORA, UTILIZAR UNA MÁQUINA
COMERCIAL DE MAYOR CAPACIDAD.



THIS TAG NOT TO BE REMOVED
EXCEPT BY THE CONSUMER

ALL NEW MATERIAL
CONSISTING OF

POLYESTER FIBER: 100%

REG. NO. CA 35992(RC)

Certification is made by the manufacturer
that the materials in this article are
described in accordance with law

Imported by

**WAL-MART STORES, INC.
BENTONVILLE, AR 72716**

Date of Delivery:
Finished Size: 86" X 90"
Federal RN# 52469

Made in China