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8 Attorney for Plaintiffs

9 **UNITED STATES DISTRICT COURT**
10 **FOR THE CENTRAL DISTRICT**
11 **OF CALIFORNIA**

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15 BRAVADO INTERNATIONAL GROUP
16 MERCHANDISING SERVICES, INC. and
17 ZION ROOTSWEAR, LLC,

18 Plaintiffs,

19
20 SKREENED, LTD, DANIEL FOX, THE
21 DREAM JUNCTION LLC and BLAIR
22 DORSEY,

23 Defendants.

24 -----X

CIVIL ACTION NO.

**COMPLAINT FOR
TRADEMARK AND
RIGHT OF PUBLICITY
INFRINGEMENT AND
UNFAIR COMPETITION**

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JURISDICTION AND VENUE

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2 1. Plaintiff BRAVADO INTERNATIONAL GROUP
3 MERCHANDISING SERVICES, INC. (“Bravado”) is a corporation duly
4 organized under the laws of the State of California with a place of business in Los
5 Angeles, California. Plaintiff ZION ROOTSWEAR, LLC (“Zion”) is a limited
6 liability corporation duly organized under the laws of the State of Florida with a
7 place of business in Los Angeles, California.
8

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10 2. Upon information and belief, at all relevant times herein, Defendants
11 SKREENED, LTD, DANIEL FOX, THE DREAM JUNCTION LLC and BLAIR
12 DORSEY have transacted business in and/or have committed their infringing
13 activities alleged below in the Central District of California, including selling
14 infringing goods in and/or transporting infringing goods and/or causing or
15 directing the transport of goods into the Central District of California, and/or
16 knowing that said activities would affect Bravado, a California corporation,
17 and/or would have an effect in the Central District of California. Upon
18 information and belief, Defendants DANIEL FOX and BLAIR DORSEY
19 authorized and/or directed and/or participated in the infringement alleged herein.
20

21 3. This action arises under the Lanham Trademark Act (15 U.S.C. 1051
22 et seq). This Court has jurisdiction over this action under 28 U.S.C. 1331, 28
23 U.S.C. 1338(a) and 15 U.S.C. 1125(a). This Court also has supplemental
24 jurisdiction over the Second, Third, Fourth, Sixth, Seventh, Eighth and Ninth
25 Causes of Action because they arise out of a common nucleus of operative facts
26 as the First Cause of Action.
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PARTIES

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4. The Doors, Five Seconds of Summer, The Weeknd, Kanye West, Tupac Shakur, Nicki Minaj, Black Sabbath, Guns N’ Roses, Ozzy Osbourne, Justin Bieber, Ariana Grande, Slipknot and Bob Marley (the “Musical Performers”) are world famous performers who have used their respective names, trademarks and likenesses to identify themselves in all phases of the entertainment industry to distinguish themselves from other professional entertainers.

5. Bravado has been, at all times relevant herein, engaged in the business of marketing and selling merchandise bearing the names, trade names, trademarks, logos and/or likenesses of the Musical Performers throughout the United States pursuant to agreements between Bravado and the Musical Performers that grant to Bravado the exclusive right to sell products bearing said parties’ names, trademarks and likenesses and/or the right to commence lawsuits regarding infringement of their rights. Zion has been, at all times relevant herein, engaged in the business of marketing and selling merchandise bearing the name, trade name, trademark, logo and/or likeness of Bob Marley throughout the United States and has been granted the exclusive right to sell products bearing the Bob Marley name, trademark and likeness and/or the right to commence lawsuits regarding infringement of the Bob Marley rights.

6. Defendants are or were distributing, advertising and selling unauthorized shirts and/or other items embodying the names, trademarks and/or likenesses of the Musical Performers (collectively the “Infringing Merchandise”)

1 and/or using the names, trademarks and/or likenesses to sell and/or distribute
2 products throughout the United States by various means of interstate transport and
3 delivery in violation of the rights of Plaintiffs and the Musical Performers under
4 the Lanham Act.

5
6 **BACKGROUND**
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8 7. Each of the Musical Performers has achieved nationwide fame and
9 notoriety.

10
11 8. Since the dates set forth below, the Musical Performers have
12 identified themselves with each party's respective name and trademark as set
13 forth below. Separately, and/or in conjunction with the likenesses of the Musical
14 Performers, the Musical Performers' trademarks and/or likenesses have been
15 used to distinguish merchandise pertaining to the Musical Performers from other
16 parties.
17

<u>Trademark</u>	Trademark Used By Musical Performer As Early As Following Date
The Doors	1967
Black Sabbath	1969
Guns N' Roses	1984
Ozzy Osbourne	1980
Slipknot	1996
Justin Bieber	2008
Five Seconds of	
Summer	2013
Bob Marley	1976
Tupac Shakur	1996
Nicki Minaj	2010

1	Ariana Grande	2000
2	Kanye West	2002
3	The Weeknd	2011

4 9. Each of the Musical Performers has sold and/or has had licensed
5 sales of tens of thousands of dollars worth of merchandise bearing each party's
6 respective name, trademark and/or likeness. Defendants' sale of the Infringing
7 Merchandise is and will be without permission or authority of Plaintiffs or any of
8 the Musical Performers.

9
10 10. Defendants' unlawful activity results in irreparable harm and injury
11 to Plaintiffs and the Musical Performers in that, among other things, it deprives
12 Plaintiffs and the Musical Performers of their absolute right to determine the
13 manner in which their images are presented to the general public through
14 merchandising; deceives the public as to the origin and sponsorship of such
15 merchandise; wrongfully trades upon and cashes in on the Musical Performers'
16 reputations, commercial value and exclusive rights and it irreparably harms and
17 injures the reputations of Plaintiffs and the Musical Performers.

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20 **AS AND FOR A FIRST CAUSE OF ACTION**
21 **Violation of 15 U. S. C. 1125(a)**

22 11. Plaintiffs repeat and reallege paragraphs 1 through 10 of this
23 Complaint as if fully set forth herein.

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25 12. This cause arises under 15 U.S.C. 1125(a) relating to trademarks,
26 trade names and unfair competition and involves false designations in commerce.

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1 13. The names, trademarks and likenesses of the Musical Performers
2 including all of the names of the Musical Performers as well as other trademarks
3 owned by the Musical Performers including The Weeknd’s XO mark and Five
4 Seconds of Summer’s 5SOS mark, (hereinafter collectively referred to as the
5 “Musical Performers’ Marks”) have been used as marks to identify the respective
6 Musical Performers and have been used in connection with their performing
7 services and the sale of various types of merchandise throughout the United
8 States. As a result of same, the Musical Performers’ Marks have developed and
9 now have a secondary and distinctive trademark meaning to purchasers of
10 merchandise.

11
12 14. Infringing Merchandise has been advertised, manufactured and/or
13 sold by Defendants, containing and/or using the names, trademarks, and/or
14 likenesses of the Musical Performers. By misappropriating and using the
15 Musical Performers’ Marks in advertising and/or on the goods that Defendants
16 have sold, Defendants have misrepresented and falsely described to the general
17 public the origin and source of the Infringing Merchandise so as to create the
18 likelihood of confusion by the ultimate purchaser as to both the source and
19 sponsorship of the Infringing Merchandise.

20
21
22 15. Defendants’ advertising, distributing, manufacturing and sale of the
23 Infringing Merchandise has infringed and will infringe upon and dilute the
24 trademarks, names and likenesses of the Musical Performers.

25
26 16. Defendants’ advertising, manufacturing and/or sale of the Infringing
27 Merchandise will be damaging to and will dilute the good will generated by each
28 of the Musical Performers and the reputations which all of the Musical Performers

1 have developed in connection with the sale of legitimate, authorized and high
2 quality merchandise.

3
4 17. Defendants' unlawful merchandising activities are without permission
5 or authority of Plaintiffs or any of the Musical Performers and constitute express
6 and implied misrepresentations that the Infringing Merchandise was created,
7 authorized or approved by Plaintiffs and/or the Musical Performers.

8
9 18. Defendants' aforesaid acts are willful violations of 15 U.S.C. 1125(a)
10 in that Defendants used, in connection with goods and services, a false designation
11 of origin and have caused and will continue to cause said goods (the Infringing
12 Merchandise) to enter into interstate commerce.

13
14 19. Plaintiffs and the Musical Performers will have no adequate remedy at
15 law if Defendants' activities are not enjoined and will suffer irreparable harm and
16 injury to their images and reputations as a result thereof.

17
18 20. As a result of Defendants' activities, Plaintiffs and the Musical
19 Performers have been damaged in an amount not yet determined or ascertainable.
20

21 **AS AND FOR A SECOND CAUSE OF ACTION**
22 **Violation of Section 3344 of the California Civil Code**

23
24 21. Plaintiffs repeat and reallege paragraphs 1 through 10 and 12
25 through 20 of this Complaint as if fully set forth herein.

1 22. Each Musical Performer is a celebrated musical performer with a
2 proprietary interest, inter alia, in the use in public of each party's respective name
3 and/or likeness.

4
5 23. Upon information and belief, Defendants have sold, manufactured
6 and/or distributed the Infringing Merchandise bearing the names and/or
7 likenesses of the Musical Performers and/or have used said names and/or
8 likenesses in advertising for Defendants' goods.

9
10 24. Neither Plaintiffs nor any of the Musical Performers or any party
11 acting on their behalf has given oral or written consent to Defendants for the use
12 of said names and/or likenesses on any items and/or in connection with
13 advertising for any goods.

14
15 25. Defendants have violated California Civil Code Section 3344 by
16 knowingly appropriating, using and exploiting the names and/or likenesses of the
17 Musical Performers on the Infringing Merchandise that they distribute or in
18 advertising for any goods for their commercial benefit without the consent of
19 Plaintiffs or the Musical Performers.

20
21
22 26. As a result of their infringing activities, Defendants have deprived
23 Plaintiffs and the Musical Performers of the right to control the time, place, terms
24 and manner by which to publicize said parties' special talents.

25
26 27. Plaintiffs and the Musical Performers will have no adequate remedy at
27 law if Defendants' activities are not enjoined and will suffer irreparable harm and
28 injury to their images and reputations as a result thereof.

1 28. As a result of Defendants' activities, Plaintiffs and the Musical
2 Performers have been damaged in an amount not yet determined or ascertainable.

3
4 **AS AND FOR A THIRD CAUSE OF ACTION**
5 **Violation of Common Law Unfair Competition**

6 29. Plaintiffs repeat and reallege paragraphs 1 through 10, 12 through 20
7 and 22 through 28 of this Complaint as if fully set forth herein.

8
9 30. The marks used on the Infringing Merchandise are identical to the
10 Musical Performers' Marks and Defendants' use thereof is likely to, and is
11 certainly intended to, cause confusion to purchasers.

12
13 31. Defendants, by misappropriating and using the Musical Performers'
14 Marks, have utilized unfair means to usurp the good will and distinctive attributes
15 of the Musical Performers' Marks.

16
17 32. Defendants have misrepresented and falsely described to the general
18 public the origin and source of the Infringing Merchandise so as to cause
19 confusion by the ultimate purchaser as to both the source and sponsorship of the
20 Infringing Merchandise.

21
22 33. Plaintiffs and the Musical Performers will have no adequate remedy
23 at law if Defendants' activities are not enjoined and will suffer irreparable harm
24 and injury to their images and reputations as a result thereof.
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1 34. As a result of Defendants’ activities, Plaintiffs and the Musical
2 Performers have been damaged in an amount not yet determined or ascertainable.

3
4 **AS AND FOR A FOURTH CAUSE OF ACTION**
5 **Violation of Common Law Right of Publicity**

6 35. Plaintiffs repeat and reallege paragraphs 1 through 10, 12 through
7 20, 22 through 28 and 30 through 34 of this Complaint as if fully set forth herein.

8
9 36. Defendants’ unauthorized use of the Musical Performers’ names
10 and/or likenesses constitutes common law right of publicity violations.

11
12 37. Plaintiffs and the Musical Performers will have no adequate remedy
13 at law if Defendants’ activities are not enjoined and will suffer irreparable harm
14 and injury to their images and reputations as a result thereof.

15
16 38. As a result of Defendants’ activities, Plaintiffs and the Musical
17 Performers have been damaged in an amount not yet determined or ascertainable.

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19 **AS AND FOR A FIFTH CAUSE OF ACTION**
20 **Trademark Dilution Under 15 U.S.C. 1125(c)**

21
22 39. Plaintiffs repeat and reallege paragraphs 1 through 10, 12 through
23 20, 22 through 28, 30 through 34 and 36 through 38 of this Complaint as if fully
24 set forth herein.

25
26 40. By virtue of the Musical Performers’ long and continuous use of the
27 Musical Performers’ Marks in interstate commerce, said marks have become and
28

1 continue to be famous within the meaning of 15 U.S.C. 1125(c). As such, said
2 marks are eligible for protection against dilution pursuant to 15 U.S.C. 1125(c).

3
4 41. Defendants' use of the Musical Performers' Marks in connection with
5 the merchandise that they are selling has threatened to cause and is causing dilution
6 of the distinctive quality of the famous Musical Performers' Marks by lessening
7 Plaintiffs' and the Musical Performers' capacity to identify the goods in violation
8 of 15 U.S.C. 1125(c).

9
10 42. Plaintiffs and the Musical Performers will have no adequate remedy at
11 law if Defendants' activities are not enjoined and will suffer irreparable harm and
12 injury to their images and reputations as a result thereof.

13
14 43. As a result of Defendants' activities, Plaintiffs and the Musical
15 Performers have been damaged in an amount not yet determined or ascertainable.

16
17 **AS AND FOR A SIXTH CAUSE OF ACTION**
18 **Violation of Section 3344.1 of the California Civil Code**

19
20 44. Plaintiffs repeat and reallege paragraphs 1 through 10, 12 through
21 20, 22 through 28, 30 through 34, 36 through 38 and 40 through 43 of this
22 Complaint as if fully set forth herein.

23
24 45. Jim Morrison was a celebrated musical performer with a proprietary
25 interest, inter alia, in the use in public of his name and likeness. Jim Morrison
26 died on July 3, 1971. On February 2, 2009, Anne R. Chewing, managing partner
27 of the George Morrison Family Partnership, L.P. ("GMFP"), registered a claim
28 pursuant to California Civil Code Section 3344.1. Bravado has been granted the

1 exclusive right to use the Jim Morrison likeness in connection with merchandise
2 including shirts.

3
4 46. Defendants have used the Jim Morrison name and likeness in
5 connection with the advertising, sale and/or distribution of the Infringing
6 Merchandise.

7
8 47. Neither Bravado nor any party acting on behalf of GMFP has given
9 oral or written consent to Defendants for the use of Jim Morrison's name and/or
10 likeness.

11
12 48. Defendants have violated California Civil Code Section 3344.1 by
13 knowingly appropriating, using and exploiting the Jim Morrison name and
14 likeness in connection with commercial exploitation and/or advertisement of the
15 merchandise that they have distributed for their commercial benefit without the
16 consent of Bravado or any party authorized to give such consent.

17
18
19 49. As a result thereof, Defendants have deprived Bravado and GMFP
20 of the right to control the time, place, terms and manner by which to publicize
21 Jim Morrison's special talents.

22
23 50. Defendants' use of the Jim Morrison name and likeness in
24 connection with the sale and distribution of the Infringing Merchandise has
25 caused, is causing and will continue to cause Bravado and/or GMFP irreparable
26 harm and injury. If Defendants' activities are not enjoined, Bravado and/or
27 GMFP will suffer irreparable harm and injury.

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1 51. As a result of Defendants' activities, Bravado and GMFP have been
2 damaged in an amount not yet determined or ascertainable.

3
4 **AS AND FOR A SEVENTH CAUSE OF ACTION**
5 **Violation of Washington Code Section 63.60.010 et seq.**
6

7 52. Plaintiffs repeat and reallege paragraphs 1 through 10, 12 through
8 20, 22 through 28, 30 through 34, 36 through 38, 40 through 43 and 45 through
9 51 of this Complaint as if fully set forth herein.

10
11 53. The Musical Performers are celebrated musical performers and
12 groups with a proprietary interest, *inter alia*, in the use in public of their
13 respective names and/or the likenesses of the individual members thereof.
14

15 54. Defendants have sold, manufactured, advertised and distributed
16 and/or caused the sale and distribution of the Infringing Merchandise bearing the
17 names and/or likenesses of at least some of the Musical Performers into the State
18 of Washington and/or have used said names and likenesses in advertising the sale
19 of said goods.
20

21
22 55. Neither Plaintiffs nor the Musical Performers or any party acting on
23 their behalf has given oral or written consent to Defendants for the use of said
24 names and/or likenesses on any items and/or in connection with any advertising.
25

26 56. Defendants have violated the Washington Right of Publicity Statute,
27 Washington Code Section 63.60.010 et seq., by appropriating, using and
28 exploiting the names and/or likenesses of the Musical Performers on the

1 Infringing Merchandise that they have manufactured, distributed and/or
2 transported and/or caused the Infringing Merchandise to be distributed and/or
3 transported into Washington and/or by advertising said products for their
4 commercial benefit without the consent of Plaintiffs or the Musical Performers.

5
6 57. As a result thereof, Defendants have deprived Plaintiffs and the
7 Musical Performers of the right to control the time, place, terms and manner by
8 which to publicize said parties' special talents.

9
10 58. Plaintiffs and the Musical Performers will have no adequate remedy
11 at law if Defendants' activities are not enjoined and will suffer irreparable harm
12 and injury to their images and reputations as a result thereof.

13
14 59. As a result of Defendants' activities, Plaintiffs and the Musical
15 Performers have been damaged in an amount not yet determined or ascertainable.

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18 **AS AND FOR AN EIGHTH CAUSE OF ACTION**
19 **Violation of Section 3344.1 of the California Civil Code**

20 60. Plaintiffs repeat and reallege paragraphs 1 through 10, 12 through
21 20, 22 through 28, 30 through 34, 36 through 38, 40 through 43, 45 through 51
22 and 53 through 59 of this Complaint as if fully set forth herein.

23
24 61. Bob Marley was a celebrated musical performer with a proprietary
25 interest, *inter alia*, in the use in public of his name and likeness. Bob Marley
26 died on May 11, 1981. On April 19, 1990, Bob Marley Music, Inc. ("Bob
27
28

1 Marley Music”) registered a claim pursuant to California Civil Code Section
2 3344.1. Zion has been granted the exclusive right to use the Bob Marley name
3 and likeness in connection with merchandise including apparel.
4

5 62. Defendants have used the Bob Marley name and likeness in
6 connection with the advertising, sale, manufacture and/or distribution of the
7 Infringing Merchandise.
8

9 63. Neither Zion nor any party acting on its behalf has given oral or
10 written consent to Defendants for the use of Bob Marley’s name and/or likeness.
11

12 64. Defendants have violated California Civil Code Section 3344.1 by
13 knowingly appropriating, using and exploiting the Bob Marley name and likeness
14 in connection with commercial exploitation and/or advertisement of the
15 merchandise that they have distributed for their commercial benefit without the
16 consent of Zion or any party authorized to give such consent.
17

18 65. As a result thereof, Defendants have deprived Zion of the right to
19 control the time, place, terms and manner by which to publicize Bob Marley’s
20 special talents.
21

22 66. The use of the Bob Marley name and likeness in connection with the
23 sale and distribution of the Infringing Merchandise by Defendants has caused, is
24 causing and will continue to cause Zion irreparable harm and injury. If
25 Defendants’ activities are not enjoined, Zion will suffer irreparable harm and
26 injury.
27
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1 67. As a result of Defendants’ activities, Zion has been damaged in an
2 amount not yet determined or ascertainable.

3
4 **AS AND FOR A NINTH CAUSE OF ACTION**
5 **Violation of Section 3344.1 of the California Civil Code**

6
7 68. Plaintiffs repeat and reallege paragraphs 1 through 10, 12 through
8 20, 22 through 28, 30 through 34, 36 through 38, 40 through 43, 45 through 51,
9 53 through 59 and 61 through 67 of this Complaint as if fully set forth herein.

10
11 69. Tupac Shakur was a celebrated musical performer with a proprietary
12 interest, *inter alia*, in the use in public of his name and likeness. Tupac Shakur
13 died on September 2, 1996. On September 27, 2004, Amaru Entertainment, Inc.
14 (“Amaru”) registered a claim pursuant to California Civil Code Section 3344.1.
15 Bravado has been granted the exclusive right to use the Tupac Shakur likeness in
16 connection with merchandise including shirts.

17
18 70. Defendants have used the Tupac Shakur name and likeness in
19 connection with the advertising, sale and/or distribution of the Infringing
20 Merchandise.

21
22 71. Neither Bravado nor any party acting on behalf of Amaru has given
23 oral or written consent to Defendants for the use of Tupac Shakur’s name and/or
24 likeness.

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1 72. Defendants have violated California Civil Code Section 3344.1 by
2 knowingly appropriating, using and exploiting the Tupac Shakur name and
3 likeness in connection with commercial exploitation and/or advertisement of the
4 merchandise that they have distributed for their commercial benefit without the
5 consent of Bravado or any party authorized to give such consent.

6
7 73. As a result thereof, Defendants have deprived Bravado and Amaru
8 of the right to control the time, place, terms and manner by which to publicize
9 Tupac Shakur's special talents.

10
11 74. Defendants' use of the Tupac Shakur name and likeness in
12 connection with the sale and distribution of the Infringing Merchandise has
13 caused, is causing and will continue to cause Bravado and/or Amaru irreparable
14 harm and injury. If Defendants' activities are not enjoined, Bravado and/or
15 Amaru will suffer irreparable harm and injury.

16
17 75. As a result of Defendants' activities, Bravado and Amaru have been
18 damaged in an amount not yet determined or ascertainable.

19
20
21 WHEREFORE, Plaintiffs respectfully pray that this Court grant the
22 following relief:

23
24 A. A Preliminary Injunction restraining, enjoining and prohibiting each
25 of the Defendants from manufacturing, distributing, advertising or selling any
26 and all merchandise bearing the names, trademarks and/or the likenesses of any
27 of the Musical Performers or any one or more of them and/or anything
28 confusingly similar thereto and/or any mark or designation that would cause

1 consumers to believe that Defendants' merchandise was sponsored and/or
2 authorized by Plaintiffs and/or any of the Musical Performers;

3
4 B. A Permanent Injunction restraining, enjoining and prohibiting each
5 of the Defendants from manufacturing, distributing, advertising or selling any
6 and all merchandise bearing the names, trademarks and/or the likenesses of any
7 of the Musical Performers or any one or more of them and/or anything
8 confusingly similar thereto and/or any mark or designation that would cause
9 consumers to believe Defendants' merchandise was sponsored and/or authorized
10 by Plaintiffs and/or any of the Musical Performers;

11
12 C. Three times Defendants' profits or three times the damages suffered
13 by Plaintiffs or the Musical Performers, whichever is greater, and reasonable
14 attorneys' fees and costs pursuant to the First and Fifth Causes of Action;

15
16 D. Defendants' profits and/or the damages suffered by Plaintiffs or the
17 Musical Performers and/or statutory damages of no less than \$750.00 for each
18 name and/or likeness that Defendants have used on each different product and/or
19 in advertising plus punitive damages and attorneys' fees pursuant to California
20 Civil Code Sections 3344 and 3344.1 (the Second, Sixth, Eighth and Ninth
21 Causes of Action);

22
23 E. Defendants' profits or damages suffered by Plaintiffs or the Musical
24 Performers, whichever is greater, plus punitive damages pursuant to the Third
25 and Fourth Causes of Action;

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1 F. Statutory damages of \$2,000,000.00 pursuant to 17 U.S.C. 1117(c)
2 for each of the trademarks that Defendants have used in connection with the sale
3 of their counterfeit products;
4

5 G. Defendants' profits and/or the damages suffered by Plaintiffs or the
6 Musical Performers and/or statutory damages of no less than \$1,500.00 for each
7 name and/or likeness that Defendants have used on each different product and/or
8 in advertising in Washington plus punitive damages and attorneys' fees pursuant
9 to Washington Code Section 63.60.060 (the Seventh Cause of Action);
10

11 H. An award of interest, including pre-judgment interest, on the
12 foregoing sums; and
13

14 I. Such other and further relief that this Court deems to be just and
15 proper.
16

17
18 Dated: March 29, 2017
19 Culver City, CA

Respectfully submitted,

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