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AMAZON TECHNOLOGIES, INC.  
7 and AMAZON CONTENT SERVICES, LLC

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**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**WESTERN DIVISION**

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AMAZON TECHNOLOGIES, INC., a ) Case No. 2:23-cv-6886  
Nevada corporation; and AMAZON )  
13 CONTENT SERVICES, LLC, a )  
Delaware limited liability company, )

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**COMPLAINT FOR DAMAGES AND  
EQUITABLE RELIEF**

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Plaintiffs, )

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vs. )

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DVD TRADE INT. LTD, an unknown )  
business entity d/b/a DVDSHELF; )  
18 MEDIA WHOLESALE UK, an )  
unknown business entity d/b/a )  
DVDSHELF; YANGCHUN ZHANG, )  
19 an individual d/b/a DVDSHELF; and )  
Does 1-10 d/b/a dvd-wholesale.com, )  
20 bilidvd.com, dvdshelf.com.au, )  
dddd.com.au, buydvds.com.au, dvds. )  
21 trade, and dvdwholesale.co.uk, )

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Defendants. )

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## I. INTRODUCTION

1  
2 1. Defendants own, operate, and control a global network of websites (the  
3 “Piracy Websites”) through which they sell digital versatile discs (“DVDs”) that  
4 infringe Amazon’s<sup>1</sup> most popular and acclaimed original, creative works, including  
5 *The Lord of the Rings: The Rings of Power* (together with the other television series  
6 listed in **Exhibit A**, the “Amazon Series”). Amazon has committed extensive  
7 resources to promote the Amazon Series, which have become hugely popular as a  
8 result, reaching millions of viewers across the globe. Defendants’ scheme to exploit  
9 the worldwide recognition of the Amazon Series is straightforward and blatant—  
10 through their Piracy Websites, Defendants openly sell pirated and infringing DVDs  
11 containing unauthorized copies of the Amazon Series. To date, Amazon has not  
12 released for sale or distribution the Amazon Series on DVD, and instead exclusively  
13 distributes such content via its streaming-video-on-demand (“SVOD”) platform,  
14 Amazon Prime Video (“Prime Video”). In addition to illegally reproducing and  
15 distributing Amazon’s copyrighted content, Defendants’ scheme infringes numerous  
16 other aspects of Amazon’s intellectual property (“IP”), including the use of Amazon’s  
17 registered trademarks and artwork on their pirated DVDs.

18 2. Amazon’s investigation reveals that Defendants’ global infringement  
19 scheme goes well beyond exploiting Amazon’s IP and entails widespread piracy.  
20 Amazon conducted multiple test purchases of non-Amazon DVDs from Defendants’  
21 Piracy Websites, and requested that the Motion Picture Association (“MPA”) examine  
22 the test-purchased DVDs. The MPA determined that every single sample was pirated,  
23 infringing, and not authorized for sale.

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<sup>1</sup> “Amazon” refers to Amazon Content Services, LLC (“Amazon Content”) and  
28 Amazon Technologies, Inc. (“Amazon Technologies”). Together, Amazon Content  
and Amazon Technologies shall also be referred to as “Plaintiffs.”



1 principal place of business in unknown. On further information and belief, DVD Trade  
2 personally participated in and/or had the right and ability to supervise, direct, and  
3 control the wrongful conduct alleged in this Complaint, and derived a direct financial  
4 benefit as a result of that wrongful conduct.

5 9. On information and belief, Defendant Media Wholesale UK (“Media  
6 Wholesale”) is a business organization doing business under the name DVD Shelf,  
7 whose principal place of business in unknown. On further information and belief,  
8 Media Wholesale personally participated in and/or had the right and ability to  
9 supervise, direct, and control the wrongful conduct alleged in this Complaint, and  
10 derived a direct financial benefit as a result of that wrongful conduct.

11 10. On information and belief, Does 1-10 are individuals or entities  
12 responsible for, or doing business as, the Piracy Websites—dvd-wholesale.com  
13 (“DVD Wholesale”), bilidvd.com, dvdshelf.com.au, ddddd.com.au, buydvds.com.au,  
14 dvds.trade, and dvdwholesale.co.uk—and working in active concert with each other  
15 and the named Defendants to knowingly and willfully manufacture, advertise, market,  
16 offer, distribute, and sell pirated and counterfeit DVDs through the Piracy Websites.  
17 The identities of these individuals or entities are presently unknown to Plaintiffs.

### 18 III. JURISDICTION AND VENUE

19 11. The Court has subject matter jurisdiction over Amazon’s claims for  
20 copyright infringement, trademark infringement and counterfeiting, and false  
21 designation of origin and false advertising, pursuant to 17 U.S.C. § 501(b), 15 U.S.C.  
22 § 1114, 15 U.S.C. § 1121, 15 U.S.C. § 1125, and 28 U.S.C. §§ 1331 and 1338(a). The  
23 Court has subject matter jurisdiction over Amazon’s claims under California’s Unfair  
24 Competition Law (Bus. & Prof. Code Section 17200, *et seq.*) (the “UCL”), pursuant  
25 to 28 U.S.C. §§ 1332 and 1367.

26 12. The Court has personal jurisdiction over Defendants because they  
27 transacted business and committed tortious acts within and directed to this judicial  
28 district, and Amazon’s claims arise from those activities. Specifically, Amazon’s

1 investigation indicates that, in fact, Defendants use a logistics hub located at 17256 S  
2 Main St, Gardena, CA 90243 (the “Gardena Address”) to warehouse and fulfill orders  
3 of their pirated and infringing DVDs for their U.S. customers. For instance, Amazon’s  
4 test purchases of pirated and infringing DVDs from Defendants’ DVD Wholesale and  
5 dvdshelf.com.au websites both displayed the Gardena Address as the return address  
6 on shipping labels for the products that Defendants delivered to Amazon’s  
7 investigator. In addition, the Terms of Service displayed on Defendants’ DVD  
8 Wholesale and bilidvd.com websites indicate Defendants ship some of their packages  
9 from a warehouse located in the U.S., presumably the Gardena Address.

10 13. Defendants’ infringement also targets U.S. companies and their IP, as the  
11 vast majority of film and television series that are offered for purchase on the Piracy  
12 Websites appear to be titles for an American audience offered by studios based in the  
13 U.S. Many of these studios are based in Los Angeles, California. In addition, certain  
14 of Defendants’ Piracy Websites advertise to customers in the U.S., including to  
15 customers in California, and ship infringing DVDs to customers in the U.S., including  
16 to customers in California, using U.S. shipping companies or entities.

17 14. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b) because a  
18 substantial part of the events giving rise to the claims occurred in the Central District  
19 of California, Western Division.

#### 20 IV. FACTS

##### 21 A. Amazon’s Copyrights and Trademarks




22 15. Amazon and/or its affiliates produce and distribute many of the world’s  
23 most buzzworthy, coveted, lauded, and award-winning television shows and motion  
24 pictures, including, but not limited to, the Amazon Series listed in **Exhibit A** attached  
25 to this Complaint. As of the date of this filing, Amazon does not sell or distribute  
26 DVDs of the Amazon Series, and instead exclusively offers these programs through  
27 Prime Video, its premium on-demand entertainment service.

28 16. Relevant to this Complaint, Amazon owns and/or controls, manages,

1 enforces, licenses, and maintains IP in connection with the Amazon Series.

2 17. Specifically, Amazon Content owns or co-owns and has exclusive rights  
 3 covered by the copyright registrations (the “Amazon Copyrights”) in connection with  
 4 certain Amazon Series. The Amazon Copyrights are attached together as **Exhibit B**  
 5 (collectively, the “Copyrighted Series”). The Amazon Copyrights cover all episodes  
 6 of the Copyrighted Series, and were duly and properly registered with the U.S.  
 7 Copyright Office prior to, or within three months of, the Copyrighted Series having  
 8 first aired on Prime Video.

9 18. Amazon Technologies also owns, manages, enforces, licenses, and  
 10 maintains the following registered trademarks (the “Amazon Trademarks”), which it  
 11 displays in connection with distribution of the Amazon Series.

<u>Mark</u>	<u>Registration No.</u> (International Classes)
	6,178,564 (IC 38, 41)
	5,775,763 (IC 9)
AMAZON STUDIOS	6,239,839 (IC 41)
prime video 	5,875,031 (IC 9, 38, 41)

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 22 19. True and correct copies of the registration certificates for each of the  
 23 Amazon Trademarks are attached together as **Exhibit C**. One or more of the Amazon  
 24 Trademarks is consistently placed within and visible within the content of each of the  
 25 Amazon Series to signify to consumers that the Amazon Series are produced,  
 26 distributed, and/or associated with Amazon. Moreover, the Amazon Series listed in  
 27 **Exhibit A** are offered exclusively on Prime Video, which is extensively branded with  
 28 one or more of the Amazon Trademarks.

1           20. By virtue of the significant time, money, and effort Amazon has  
2 expended creating, developing, advertising, and promoting the Amazon Series,  
3 millions of customers across the globe recognize Amazon as a leader in entertainment.  
4 For instance, one of the Amazon Series, *The Lord of the Rings: The Rings of Power*,  
5 which brings to screens for the first time stories of the Second Age of Middle-earth's  
6 history from J.R.R. Tolkien's *The Hobbit* and *Lord of the Rings*, attracted more than  
7 25 million viewers on its first day streaming on Prime Video, breaking all previous  
8 records.<sup>2</sup> The show has been nominated for multiple awards, including a Critic's  
9 Choice Award and a Screen Actors Guild Award.<sup>3</sup>

10           21. There is a close association among consumers between Amazon, the  
11 Amazon Trademarks, and all the products and services offered by Amazon. For  
12 hundreds of millions of consumers, the Amazon Trademarks have come to represent  
13 a wide selection of consumer products and services, outstanding customer service, and  
14 unsurpassed trust.

15           **B. Amazon's Efforts to Prevent Infringement of Its Entertainment**  
16           **Offerings**

17           22. Amazon goes to great lengths to prevent piracy and infringement of its  
18 entertainment offerings and creative works. Its robust and aggressive IP enforcement  
19 programs utilize both internal and external resources to detect and combat infringing  
20 products and services. Amazon's programs include trained internal staff who regularly  
21 monitor for IP infringements and for counterfeit sellers around the world.

22           23. When Amazon is alerted to suspected pirated, counterfeit, or infringing  
23 products, it promptly investigates and takes appropriate action.

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25           <sup>2</sup> [https://press.aboutamazon.com/2022/9/the-lord-of-the-rings-the-rings-of-power-](https://press.aboutamazon.com/2022/9/the-lord-of-the-rings-the-rings-of-power-attracts-more-than-25-million-global-viewers-on-its-first-day-marking-prime-videos-biggest-premiere-ever)  
26 [attracts-more-than-25-million-global-viewers-on-its-first-day-marking-prime-](https://press.aboutamazon.com/2022/9/the-lord-of-the-rings-the-rings-of-power-attracts-more-than-25-million-global-viewers-on-its-first-day-marking-prime-videos-biggest-premiere-ever)  
27 [videos-biggest-premiere-ever](https://press.aboutamazon.com/2022/9/the-lord-of-the-rings-the-rings-of-power-attracts-more-than-25-million-global-viewers-on-its-first-day-marking-prime-videos-biggest-premiere-ever) (aboutamazon.com) (last accessed August 18, 2023).

28           <sup>3</sup> [https://press.amazonstudios.com/us/en/original-series/the-lord-of-the-rings-](https://press.amazonstudios.com/us/en/original-series/the-lord-of-the-rings-amazon-original-series/1)  
[amazon-original-series/1](https://press.amazonstudios.com/us/en/original-series/the-lord-of-the-rings-amazon-original-series/1) (amazonstudios.com) (last accessed August 18, 2023).



1           24. In addition to its individual efforts to enforce its IP rights, Amazon sent  
2 test buys of DVDs purchased on Defendants’ Piracy Websites to the MPA. The MPA  
3 is a trade organization that serves as the voice and advocate for the film, home video,  
4 streaming, and television industries in the U.S. and across the globe, and investigates  
5 the unlawful duplication and distribution of various film and television content in  
6 order to protect content creators and reduce piracy. As discussed below, after review,  
7 the MPA determined that certain non-Amazon DVD titles sold by Defendants were  
8 also counterfeit.

9           **C. Defendants’ Piracy Scheme**

10           25. Defendants operate the Piracy Websites, through which they unlawfully  
11 advertise, market, and sell pirated DVDs that reproduce and distribute the content of  
12 the Amazon Series, thereby infringing the Amazon Copyrights, and that also bear and  
13 include depictions of the Amazon Trademarks without authorization, thereby  
14 infringing the Amazon Trademarks.

15           26. Amazon’s investigation started with DVD Wholesale, which targets U.S.  
16 customers. The DVD Wholesale website boasts that it is the “leading dvd distributor  
17 warehouse in the U.S.” and “sell[s] top quality DVDs at factory price.”<sup>4</sup>

18           27. Amazon’s investigation then revealed that DVD Wholesale is connected  
19 to a global operation controlled by DVD Trade, Zhang, and other unknown parties  
20 that sell pirated and infringing DVDs to customers around the world through the  
21 Piracy Websites, listed below.

<b>Piracy Websites</b>
www.dvd-wholesale.com
www.bilidvd.com
www.dvdshelf.com.au

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28 <sup>4</sup> <https://www.dvd-wholesale.com/> (last accessed August 18, 2023).



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<b>Piracy Websites</b>
www.ddddd.com.au
www.buydvds.com.au
www.dvds.trade
www.dvdwholesale.co.uk

28. Each of the Defendants’ Piracy Websites is accessible in the U.S.

29. The connections tying the Piracy Websites to Defendants Zhang and DVD Trade, as well as to each other, are extensive.

**1. Similarities of the Piracy Websites**

30. First, Defendants’ Piracy Websites are similar in layout and appearance, displaying similar home pages and “contact” pages, as well as similar website banners, fonts, colors, and typeface. The Piracy Websites also largely sell the same titles.

31. The similarities between the Piracy Websites are apparent from a review of the websites. Below are screenshots from certain Piracy Websites’ homepages, taken on or about March 7, 2023:

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## dvd-wholesale.com

New to DVD Trending Movies Box Set Blu-ray

DVD&BLU-RAY

**WHOLESALE**

Search products...

**0** Log In

Kids Contact

### DVD & Blu-ray Wholesale for TV Series & Movies

We're a leading [dvd distributor](#) company in the U.S., we sell top quality DVDs at factory price, offering the free shipping for every order within the United States. With the warehouse in the U.S. and China, you could expect an ETA 8-10 working days by USPS, UPS & Fedex with tracking. We guarantee you get the item you ordered or the full refund. Try a new order with us today, guarantee full refund if not satisfied and no returns necessary.

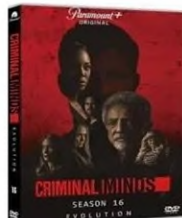
#### New to DVD Wholesale



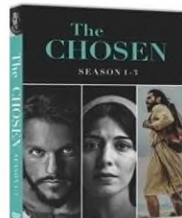
The Legend of Vox Machina Complete Season 1-2 DVD Wholesale (6-Disc 2022-2023)  
\$18.35



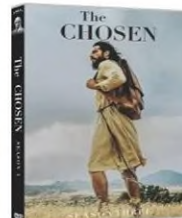
Criminal Minds Complete Series 1-16 DVD Wholesale (89-Disc 2005-2023)  
\$122.85



Criminal Minds Season 16 DVD Wholesale (3-Disc 2023)  
\$12.85



The Chosen Complete Series 1-3 DVD Wholesale (6-Disc 2017-2023)  
\$24.79



The Chosen Season 3 DVD Wholesale (2-Disc 2023)  
\$13.75



Animal Kingdom Season 6 DVD Wholesale (3-Disc 2022)  
\$13.85

## bilidvd.com

BILIDVD New to DVD New Movies Cheap DVDs

No.1 CHEAP DVDs

**BILIDVD**

Search DVDs...

**0** Log In

Kids DVD Contact Us

### Where to buy the new release dvds? We're the best online DVD retailer shop in the U.S.

BILIDVD sells new release DVDs & Blu-rays for tv series, movies and DVD box sets, all our DVDs are region 1 for the U.S. We guarantee you to get what you paid for or a full refund and PayPal covers you for upto 180 days for any issues that may occur.

#### New to DVD



Evil Complete Series 3 DVD  
\$16.85



Reacher Complete Series 1 DVD  
\$16.85



Yellowstone Complete Series 1-5 Part 1 DVD  
\$49.95



Yellowstone Series 5 Part 1 DVD (8 Episodes)  
\$16.45



Glass Onion A Knives Out Mystery DVD  
\$13.85



All Creatures Great and Small Complete Series 3 DVD  
\$14.45

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865 South Figueroa Street, Suite 2400  
Los Angeles, CA 90017-2566  
213.633.6800 main · 213.633.6899 fax

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# dvdshelf.com.au

New to DVD Movies Box Sets Star Wars

AUSTRALIA

## DVDSHELF

Search products... Log In

Popular BBC Shows Contact

### Latest DVD Releases

					
<b>The Legend of Vox Machina Complete Series 1-2 DVD</b> \$43.95	<b>Criminal Minds Complete Series 1-16 DVD</b> \$174.95	<b>Criminal Minds Season 16 DVD</b> \$36.90	<b>The Chosen Season 3 DVD</b> \$33.79	<b>The Chosen Complete Series 1-3 DVD</b> \$69.79	<b>Animal Kingdom Season 6 DVD</b> \$33.79

# dddd.com.au

Home New to DVD Sale Kids

AUSTRALIA



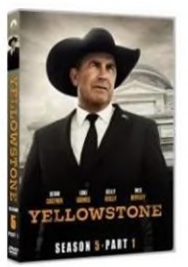



## 5D DVDS

Search DVDs... Log In

### Your one-stop DVD shop for the latest DVD releases

Online shopping for the *latest dvd releases* from *recently released dvds* to tv box sets and movie collection, free shipping over \$1 and 180 days money back guarantee. All our DVDs are region 4 PAL for Australia, you don't need a multi-region DVD player. Browse our great selection now: [Biography](#) | [Police Procedural](#) | [Ken Burns Documentary](#) | [Popular BBC Shows](#) | [War](#) | [Vampire](#) | [Zombie](#) | [Best Of All Time for Kids](#) | [Disney Classics](#) | [Body Workout](#) | [Animated Sitcom](#) | [DC Comics](#) | [Japanese Animation](#) | [Marvel Studios](#) | [Space Opera](#) | [TV Mini Series](#). TO know more about the DVDs? Check the ratings and reviews on [IMDb](#).

### Latest DVD Releases

					
<b>Evil Complete Series 3 DVD</b> \$32.95	<b>Yellowstone Complete Series 1-5 Part 1 DVD</b> \$89.95	<b>Yellowstone Series 5 Part 1 DVD (8 Episodes)</b> \$27.95	<b>All Creatures Great and Small Complete Series 3 DVD</b> \$29.95	<b>Fear the Walking Dead Complete Series 1-7 DVD Set</b> \$115.99	<b>Fear the Walking Dead Complete Series 7 DVD</b> \$29.99



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# buydvds.com.au

New to DVD Movies Best DVD Boxset Kids DVD

AUSTRALIA

## DVD SHOP

Search products...   Log In

Contact

### New to DVD



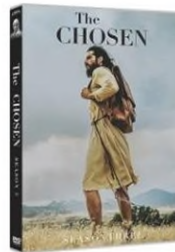
The Legend of Vox Machina Complete Season 1-2 DVD  
\$43.95



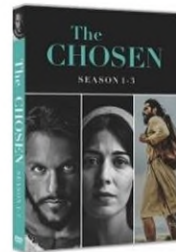
Criminal Minds Complete Series 1-16 DVD  
\$174.95



Criminal Minds Season 16 DVD  
\$36.95



The Chosen Season 3 DVD  
\$33.95



The Chosen Complete Series 1-3 DVD  
\$69.95



Animal Kingdom Season 6 DVD  
\$33.95

# dvdwholesale.co.uk

New Release DVDs Movies on DVD

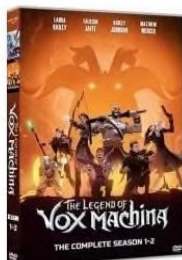
DVD&BLU-RAY

## WHOLESALE

Search products...   Log In

Wholesale DVD Box Sets Contact

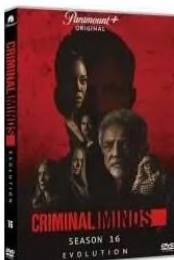
### New to DVD



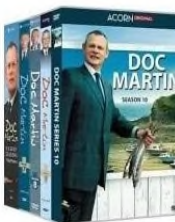
The Legend of Vox Machina Complete Season 1-2 DVD Wholesale UK  
£16.95



Criminal Minds Complete Series 1-16 DVD Wholesale UK  
£108.45



Criminal Minds Season 16 DVD Wholesale UK  
£12.65



Doc Martin Complete Series 1-10 DVD Set Wholesale UK  
£49.55



Fear the Walking Dead Complete Series 1-7 DVD Set Wholesale UK  
£53.25



Star Trek Prodigy Complete Series 1 DVD Wholesale UK  
£10.75

## 2. Defendants' Sale of Pirated DVDs

32. Second, each of the Piracy Websites offers pirated DVDs for the same collection of Amazon Series, which are listed in **Exhibit A**, and each of the Piracy Websites advertises these DVDs in a similar manner.

1           33. For example, below are screenshots from each of the Piracy Websites  
2 advertising the sale of *The Lord of the Rings: The Rings of Power*, taken on or about  
3 March 7, 2023.<sup>5</sup> Each of the Piracy Websites displays the same infringing DVD cover  
4 of *The Lord of the Rings: The Rings of Power*, which copies Amazon’s marketing  
5 posters for the series. Defendants also list the same payment methods from U.S.  
6 payment companies (Visa, MasterCard, American Express, and Discover), and each  
7 of the Piracy Websites lists identical categories of information, including “Item  
8 Condition,” “Shipping,” and “Payment.”

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27 <sup>5</sup> The screenshot for the dvds.trade website, shown below, was taken on or about May  
28 25, 2023.

# dvd-wholesale.com

New to DVD Trending Movies Box Set Blu-ray

DVD&BLU-RAY

**WHOLESALE**

Search products...



Log In

Kids Contact

Search a title..



## Genres of DVD

- Action (56)
- Adult Animated (1)
- Adventure (31)
- Animated Sitcom (10)
- Best of All the Time (4)
- British TV Series (44)
  - > BBC Shows (30)
  - > PBS (1)
- Comedy Drama (168)
  - > Black Comedy (13)
  - > Family Drama (56)
  - > Fantasy (42)
  - > Medical Drama (24)
  - > Romance (35)
  - > Teen Drama (3)
- Crime Drama (130)
  - > Detective (17)
  - > Legal Drama (14)
  - > Police Procedural (50)
  - > Political Drama (11)
- Historical (99)
  - > Biography (12)
  - > Christ Drama (2)
  - > Documentary (9)
  - > Ken Burns (12)
  - > War (10)
  - > Western (20)
- Horror (31)
  - > Vampire (7)
  - > Zombie (9)
- Kids DVD (77)
  - > Adventure for Kids (50)
  - > Animation (24)
  - > Best Of All the Time (26)
  - > Disney Animation (26)
  - > Disney Movie (5)



Home / Shop All DVDs / TV Series / The Lord of the Rings The Rings of Power Complete Series 1 DVD Wholesale (3-Disc 2022)

Action, Adventure, Shop All DVDs, TV Series

## The Lord of the Rings The Rings of Power Complete Series 1 DVD Wholesale (3-Disc 2022)

★★★★★ (87 customer reviews)

Buy The Lord of the Rings The Rings of Power Season 1 DVD 2022 IN BULK at the CHEAPEST wholesale price from the BEST United States DVD Distributor! Order the 3-Disc The Lord of the Rings TV series set from our DISCOUNT DVD Warehouse located in Oregon & HK. We're the reliable DVD, Blu-ray movies suppliers for this The Lord of the Rings The Rings of Power Complete Series 1 DVD In Stock, FREE SHIPPING by UPS | Fedex | USPS, TAX Free & we paid the Import Fee, ETA 8-12 Days.

**Attention:** We do not take orders less than 6 DVDs (can be different).

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Categories: Action, Adventure, Shop All DVDs, TV Series

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### Quantity discount

Quantity	1 - 2	3 - 9	10 - 19	20 - 49	50+
Price	\$12.95	\$11.01	\$10.36	\$9.71	\$9.07

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The Rings of Power Complete Series 1 DVD

Action, Adventure, Shop All DVDs, TV Series

### The Lord of the Rings The Rings of Power Complete Series 1 DVD

★★★★★ (3 customer reviews)

\$29.95 & Free Shipping

**Where to buy the lord of the rings the rings of power complete series 1 dvd in the United States? We have region 1 the lord of the rings the rings of power season 1 dvd on sale, buy the lord of the rings the rings of power season 1 on dvd from our online DVD shop.**

- & FREE Delivery within the United States.
- Item Condition: Brand New Sealed.
- Shipping: Send from the United States. [Read more](#) for ETA, return & refund
- Guarantee: 180 days money back for any reason, seller pays return shipping fee.

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  - > War (10)



Home / Shop All DVDs / TV Series / The Lord of the Rings The Rings of Power Season 1 DVD



Action, Adventure, Shop All DVDs, TV Series

## The Lord of the Rings The Rings of Power Season 1 DVD

★★★★★ (281 customer reviews)

**\$32.85** & Free Shipping

**The Lord of the Rings The Rings of Power Season 1 DVD FOR CHEAPEST SALE in Australia working with Region 4 DVD Players. This 3-Disc Brand New TV series set is released from 2022. INSTOCK SALE | Dispatch in 2-3 Days from Sydney, ETA 10+ Days | FREE SHIPPING by AU Post with Tracking | Quick Email Reply | 180-DAY Refund | Seller Pays Return Shipping Fee.**

Condition: Brand new and sealed.

Format: Region 1&0, PAL for AU & NZ

Shipping: Send by AUS Post in 2-3 days from NSW

ETA: Please check our [Must Read Re4 Ordering](#)

Returns & Refund: 180 days money back for quality issues, seller pays return postage.

- 1 +

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- No-Risk Money Back Guarantee!
- No Hassle Refunds
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SKU: D\_LordRingsPower1-25

Categories: Action, Adventure, Shop All DVDs, TV Series

Tags: Disc-3, The Lord of the Rings The Rings of Power Complete Series 1 DVD, The Lord of the Rings The Rings of Power Season 1 DVD, The Lord of the Rings The Rings of Power Season 1 on DVD

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### Description

### The Lord of the Rings The Rings of Power Complete Series 1 DVD for Sale in Australia

This epic drama is set thousands of years before the events of J.R.R. Tolkien's The Hobbit and The Lord of the Rings, and will take viewers back to an era in which great powers were forged, kingdoms rose to glory and fell to ruin, unlikely heroes were tested, hope hung by the finest of threads, and the greatest villain that ever flowed from Tolkien's pen threatened to cover all the

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  - Ken Burns (12)
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Home / Shop All DVDs / TV Series / Buy The Lord of the Rings The Rings of Power Complete Series 1 DVD

Action, Adventure, Shop All DVDs, TV Series

## Buy The Lord of the Rings The Rings of Power Complete Series 1 DVD

★★★★★ (5 customer reviews)

\$32.20 & Free Shipping

**Where to buy the lord of the rings the rings of power complete series 1 dvd in Australia? We have region 4 the lord of the rings the rings of power season 1 dvd on sale, buy the lord of the rings the rings of power season 1 on dvd from our online DVD shop.**

Item Condition: Brand New Sealed

Format: DVD region 1 on cover [plus 0](#) | working in Australia & worldwide

Number of Discs: 3

Shipping: With tracking by AU Post

Payment: PayPal

Read about [ALL YOU MUST KNOW](#) before placing orders. (shipping, return & refund policy)

Estimated delivery on 17 - 20 March, 2023

- 1 +

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SKU: DD\_LordRingsPower1

Categories: Action, Adventure, Shop All DVDs, TV Series

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Home / Shop All DVDs / TV Series / The Lord of the Rings  
The Rings of Power Complete Series 1 DVD for Sale AU

Action, Adventure, Shop All DVDs, TV Series

## The Lord of the Rings The Rings of Power Complete Series 1 DVD for Sale AU

★★★★★ (65 customer reviews)

**\$32.90** & Free Shipping

Buy The Lord of the Rings The Rings of Power Season 1 DVD 2022 from the BEST Australia DVD Online Shop! Order now and enjoy the 3-Disc The Lord of the Rings TV series set from Amazon Studios. This The Lord of the Rings The Rings of Power Complete Series 1 DVD is In Stock, send from SYDNEY by AU Post w/ TRACK, ETA 8-12 Days. 180 Days money back guarantee for any reason, we pay the return postage.

Product Condition: Brand new, factory sealed

Format: Region 1&0 for Australia DVD players

Item Location: Sydney, Australia

Shipping Charge: Free shipping

Read our: [Terms and Conditions](#) to know more about ETA.

Return & Refund

- 1 + **ADD TO CART**

Guaranteed Safe Checkout



- ✔ No-Risk Money Back Guarantee!
- ✔ No Hassle Refunds
- ✔ Secure Payments

SKU: B\_LordRingsPower1-25

Categories: Action, Adventure, Shop All DVDs, TV Series

Tags: Disc-3, The Lord of the Rings The Rings of Power Complete Series 1 DVD, The Lord of the Rings The Rings of Power Season 1 DVD, The Lord of the Rings The Rings of Power Season 1 on DVD

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Action, Adventure, Shop All DVDs, TV Series

## The Lord of the Rings The Rings of Power Complete Series 1 DVD on Sale #1

★★★★★ (5 customer reviews)

£18.19 & Free Shipping

Where to buy **the lord of the rings the rings of power complete series 1 dvd**? Shop the lord of the rings the rings of power season 1 dvd at the cheapest price and free shipping within UK.

Format: DVD working in UK

Genre: Action, Adventure

Release Year: 2022

- 1 +

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- Secure Payments

SKU: LordRingsPower1

Categories: Action, Adventure, Shop All DVDs, TV Series

Tags: Hobbit, Middle Earth, The Lord of the Rings The Rings of Power Complete Series 1 DVD, The Lord of the Rings The Rings of Power Season 1 DVD, The Lord of the Rings The Rings of Power Season 1 on DVD

**PayPal** Buy Now

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### Description

Buy the lord of the rings the rings of power complete series 1 dvd from dvds.trade online store, unbeatable lowest price and free delivery on every order.

## Storyline of The Lord of the Rings The Rings of Power Complete Series 1 DVD

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  - Spy Thriller (5)
  - Thrillers (36)
- Historical (98)
  - Biography (12)
  - Documentary (9)
  - Ken Burns (12)
  - War (9)
  - Western (20)



Home / Shop All DVDs / TV Series / The Lord of the Rings The Rings of Power Complete Series 1 DVD Wholesale UK

Action, Adventure, Shop All DVDs, TV Series

## The Lord of the Rings The Rings of Power Complete Series 1 DVD Wholesale UK

★★★★☆ (3 customer reviews)

Looking for the lord of the rings the rings of power complete series 1 dvd wholesalers UK? We are the lord of the rings the rings of power season 1 dvd wholesale distributor in the UK, buy the lord of the rings the rings of power season 1 on dvd in bulk with us.

Item Condition: Brand New Sealed

Format: DVD region 1 on cover plus\_0 | working in the UK, Euro & worldwide

Number of Discs: 3

Shipping: With tracking by Royal Mail or Fedex

Payment: PayPal

Min order: x6 pcs (can be different DVDs)

Read about [ALL YOU MUST KNOW](#) before placing orders. (shipping, return & refund policy)

Guaranteed Safe Checkout

- No-Risk Money Back Guarantee!
- No Hassle Refunds
- Secure Payments

**£15.95** & Free Shipping

- 1 + ADD TO BASKET

SKU: LordRingsPower1

Categories: Action, Adventure, Shop All DVDs, TV Series

Tags: Based On Film, Disc-3, Fight, Hobbit, Middle Earth, Ring, Sword

Quantity discount

Quantity	1 - 4	5 - 9	10 - 49	50 - 99	100+
Price	£15.95	£13.88	£13.24	£12.60	£11.96

### Description

**The Lord of the Rings The Rings of Power Complete Series**



1           34. Plaintiffs conducted test purchases of each of the Amazon Series offered  
2 for sale by the Piracy Websites. Defendants shipped DVDs that Amazon has  
3 confirmed contain pirated and infringing copies of the Amazon Series, and that bear  
4 infringing depictions of the Amazon Trademarks both on the DVD covers and within  
5 the audiovisual content of the DVDs. Amazon has never offered for sale, sold,  
6 licensed, or otherwise authorized the sale of any DVDs of any of the Amazon Series,  
7 which Amazon currently streams exclusively through Prime Video.

8           35. Amazon also amassed evidence to show that Defendants' global  
9 infringement scheme extends beyond infringement of Amazon's IP. In coordination  
10 with the MPA, Amazon conducted multiple test purchases from Defendants' Piracy  
11 Websites of DVDs bearing IP owned by other MPA members. Following delivery of  
12 those products, Amazon provided the DVDs to MPA for analysis. The MPA examined  
13 the DVDs and determined that every single sample, comprising more than 20 works,  
14 were infringing.

15           36. Moreover, Defendants' Piracy Websites target U.S. companies and their  
16 IP, as the vast majority of film and television series that are offered for purchase on  
17 the websites are titles for an American audience offered by studios based in the U.S.

18                   **3.     *The Interrelated WhoIs Information***

19           37. Third, Amazon located WhoIs<sup>6</sup> registrant information for each of the  
20 Piracy Websites. The WhoIs registrant information shows that six of the seven Piracy  
21 Websites either are, or have been, clearly affiliated with Defendant DVD Shelf or  
22 Defendant Zhang, as shown below:

23  
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27 \_\_\_\_\_  
28 <sup>6</sup> "WhoIs" refers to a widely used Internet record that identifies who owns a domain  
and how to get in contact with them.

Defendants' Website	Website WhoIs Registrant Information <sup>7</sup>
www.dvd-wholesale.com	DVDSHELF (Registrant Organization 2019-2022)
www.bilidvd.com	DVDSHELF (Registrant Organization 2020-2022)
www.dvdshelf.com.au	Yangchun Zhang (Registrant Name)
www.ddddd.com.au	Yangchun Zhang (Registrant Name)
www.buydvds.com.au	Yangchun Zhang (Registrant Name)
www.dvds.trade	DVDSHELF (Registrant Organization)

38. Public records also show that Defendant Zhang is the owner of a trademark registration filed in Australia for the mark “DVD Shelf.” Defendant Zhang’s address listed with “IP Australia,” the Australian Trademark Office, is Wanxiang 7, ZingYi Ave, Quingshen County Meishan Sichuan, CN 620460. Zhang filed the trademark on August 24, 2017 and claimed rights in Australian Trademark Class 35 (“Retail and wholesale of videos and DVDs; Sale of DVDs . . . movie DVDs, TV show DVDs”).

#### 4. *Payment Recipient Information*

39. Finally, Amazon’s investigation uncovered that each of the Defendants’ Piracy Websites uses the online payment system PayPal, Inc. (“PayPal”) to process payments related to the purchase of their DVDs. Amazon’s investigator conducted test purchases of the DVDs for the Amazon Series from each of the Piracy Websites using PayPal as the payment method. The PayPal receipts for five of the Websites—DVD Wholesale, dvdshelf.com.au, dddd.com.au, buydvds.com.au, and bilidvd.com—identify the same entity, DVD Trade, as the payment recipient. On information and belief, DVD Trade is an alias for Defendant DVD Shelf.

40. The PayPal recipient displayed on the receipts received from the other

<sup>7</sup> As of 2022 through the present, the registrant information for DVD Wholesale and bilidvd.com is privacy-protected and is no longer publicly available.



1 two Websites—dvdwholesale.co.uk and dvds.trade—is the same entity—Media  
 2 Wholesale. The receipts also bear the same contact email of “ltd.turing@gmail.com.”  
 3 Thus, although dvdwholesale.co.uk does not identify DVD Trade or Zhang as the  
 4 website registrant or PayPal merchant, its use of the same PayPal recipient (Media  
 5 Wholesale) and contact email as dvds.trade clearly establishes its connection to the  
 6 Piracy Websites.

7 41. The WhoIs registrant information, together with the PayPal recipient  
 8 information, for the Pirated DVD Websites are summarized below.

Pirated DVD Website	WhoIs Registration Information <sup>8</sup>	PayPal Recipient
www.dvd-wholesale.com	DVDSHELF (Registrant Organization 2019-2022)	DVD Trade Int. Ltd.
www.bilidvd.com	DVDSHELF (Registrant Organization 2020-2022)	DVD Trade Int. Ltd.
www.dvdshelf.com.au	Yangchun Zhang (Registrant Name)	DVD Trade Int. Ltd.
www.ddddd.com.au	Yangchun Zhang (Registrant Name)	DVD Trade Int. Ltd.
www.buydvds.com.au	Yangchun Zhang (Registrant Name)	DVD Trade Int. Ltd.
www.dvds.trade	DVDSHELF (Registrant Organization)	Media Wholesale UK (with contact email ltd.turing@gmail.com)
www.dvdwholesale.co.uk	Privacy-protected	Media Wholesale UK (with contact email ltd.turing@gmail.com)

27 <sup>8</sup> As of 2022 through the present, the registrant information for DVD Wholesale and  
 28 bilidvd.com is privacy-protected and is no longer publicly available.

1           **D. Defendants’ Mass Infringement Causes Plaintiffs Immediate and**  
2           **Irreparable Harm**

3           42. The scope of Defendants’ infringement of the Amazon Series is massive  
4 and ongoing. Defendants infringe the Amazon Series through their network of at least  
5 seven Piracy Websites, which ship to customers in the U.S. and abroad, twenty-four  
6 hours a day, seven days a week.

7           43. Amazon, not Defendants, has the right to decide where, when, and how  
8 its content will be distributed to the public. In the case of the Amazon Series, Amazon  
9 streams this content exclusively through its SVOD platform, Prime Video.

10          44. By selling pirated DVDs that infringe every aspect of Amazon’s IP, from  
11 the Amazon Copyrights to the Amazon Trademarks, Defendants illegally and unfairly  
12 compete with Amazon, divert sales and subscriptions from Prime Video, and usurp  
13 Amazon’s control over the Amazon Copyrights and Amazon Trademarks.

14          45. Defendants also jeopardize Amazon’s reputation for quality and  
15 unsurpassed customer service.

16          46. This threat is underscored by customer complaints concerning  
17 Defendants’ DVDs and their poor quality. For instance, a customer left a one-star  
18 review of DVD Shelf’s website in 2021 stating that despite the company’s “claim[] to  
19 only sell genuine products,” the customer found the DVDs were “of EXTREMELY  
20 poor quality” and are “absolutely pirated copies,” with, among other issues, episodes  
21 missing, sync problems, editing issues, and faulty discs.

22          47. Another customer, who claimed to be located in California, also  
23 complained about DVD Shelf’s products:

24                   This company is selling pirated versions of DVDs. I purchased two  
25                   sets, which were faulty. I contacted the actual production company  
26                   as I was told that they would have to replace the discs. The company  
27                   had me send them the dvds and they confirmed that they were pirated.

28          48. Defendants anticipate that their customers will have complaints

1 concerning their pirated DVDs and attempt to dissuade customers from contacting  
2 regulators. For instance, in or around November 2022, Defendants instructed their  
3 customers on the DVD Wholesale’s FAQ section to “submit a customer complaint to  
4 us before [contacting] FTC [the Federal Trade Commission]” if they experienced  
5 problems with the DVDs.

6 49. Defendants’ infringing conduct will continue if it is not enjoined.  
7 Defendants’ infringing conduct is causing immediate and irreparable harm to  
8 Amazon, and that harm will continue until Defendants are enjoined from engaging in  
9 their illegal conduct. Amazon now brings this action to protect its rights and put an  
10 end to Defendants’ harmful conduct.

11 **V. CLAIMS FOR RELIEF**

12 **FIRST CLAIM FOR RELIEF**

13 *(by Amazon Content Against All Defendants)*

14 **Copyright Infringement – 17 U.S.C. § 501**

15 50. Amazon Content incorporates by reference the allegations of the  
16 preceding paragraphs as though fully set forth herein.

17 51. Under Section 106 of the Copyright Act, Amazon Content owns,  
18 co-owns, or exclusively controls certain rights that are protected by copyright in  
19 connection with original audiovisual works, including the Copyrighted Series. The  
20 copyright registrations being asserted against the Defendants by Amazon Content are  
21 attached together in **Exhibit B**.

22 52. Defendants have infringed the Amazon Copyrights for the Copyrighted  
23 Series by reproducing, distributing copies of, publicly displaying, and/or creating  
24 derivative works of the copyrighted materials protected by the Amazon Copyrights  
25 without Amazon’s authorization.

26 53. Defendants’ conduct has been intentional, deliberate, and willful within  
27 the meaning of 17 U.S.C. § 504.

28 54. Defendants have committed acts which constitute infringement of the

1 Amazon Copyrights for the Copyrighted Series.

2 55. Defendants derive a financial benefit directly attributable to the  
3 infringement of the Amazon Copyrights for the Copyrighted Series.

4 56. As a result of Defendants' wrongful conduct, Amazon is entitled to  
5 recover its actual damages and Defendants' profits attributable to the infringement.  
6 Alternatively, Amazon is entitled to statutory damages under 17 U.S.C. § 504(c).

7 57. The award of statutory damages should be enhanced in accordance with  
8 17 U.S.C. § 504(c)(2).

9 58. Amazon is further entitled to its attorneys' fees and full costs pursuant to  
10 17 U.S.C. § 505.

11 59. In addition, Amazon is entitled to injunctive relief, including an order  
12 impounding all infringing materials. Amazon has no adequate remedy at law for  
13 Defendants' wrongful conduct because, among other things: (a) Amazon Copyrights  
14 and the works they protect are unique and valuable properties that have no readily  
15 determinable market value; (b) Defendants' infringement harms Amazon such that  
16 Amazon could not be made whole by any monetary award; and (c) Defendants'  
17 wrongful conduct, and the resulting harm to Amazon, is continuing.

18 **SECOND CLAIM FOR RELIEF**

19 *(by Amazon Technologies Against All Defendants)*

20 **Trademark Counterfeiting and Trademark Infringement – 15 U.S.C. § 1114**

21 60. Amazon Technologies incorporates by reference the allegations of the  
22 preceding paragraphs as though set forth herein.

23 61. Defendants' activities constitute counterfeiting and infringement of the  
24 Amazon Trademarks as described in the paragraphs above.

25 62. Amazon Technologies owns the Amazon Trademarks and advertises,  
26 markets, offers, distributes, and sells its products using the Amazon Trademarks  
27 described above and uses those trademarks to distinguish its products from the  
28 products and related items of others in the same or related fields.

1           63. Because of Amazon’s long, continuous, and exclusive use of the Amazon  
2 Trademarks identified in this Complaint, the trademarks have come to mean, and are  
3 understood by customers and the public, to signify products from Amazon.

4           64. Defendants unlawfully advertise, market, offer, distribute, and sell  
5 products bearing counterfeit versions of the Amazon Trademarks with the intent and  
6 likelihood of causing customer confusion, mistake, and deception as to the products’  
7 source, origin, and authenticity. Specifically, Defendants intend customers to believe,  
8 incorrectly, that the products originate from, are affiliated with, and/or are authorized  
9 by Amazon and likely cause such erroneous customer beliefs.

10           65. As of the date of the filing of this Complaint, Defendants continue to use  
11 the Amazon Trademarks in connection with their commercial sales in a manner that  
12 is likely to cause confusion, to cause mistake, or to deceive as to the source or origin  
13 of these counterfeit and infringing DVDs, and the sponsorship, affiliation, and  
14 approval by Amazon of these counterfeit and infringing DVDs.

15           66. Amazon has not consented to Defendants’ use of the Amazon  
16 Trademarks and has never authorized Defendants’ use of Amazon Trademarks.

17           67. Defendants’ infringement of the Amazon Trademarks is willful.

18           68. Amazon has been and continues to be damaged by Defendants’  
19 infringement.

20           69. As a result of Defendants’ wrongful conduct, Amazon is entitled to  
21 recover its actual damages, Defendants’ profits attributable to the infringement, treble  
22 damages, and attorneys’ fees pursuant to 15 U.S.C. § 1117(a) and (b). Alternatively,  
23 Amazon is entitled to statutory damages under 15 U.S.C. § 1117(c) for Defendants’  
24 use of counterfeit marks.

25           70. Amazon is further entitled to injunctive relief, including an order  
26 impounding all counterfeit and infringing products and promotional materials in  
27 Defendants’ possession. Amazon has no adequate remedy at law for Defendants’  
28 wrongful conduct because, among other things: (a) the Amazon Trademarks are

1 unique and valuable properties that have no readily determinable market value;  
2 (b) Defendants’ counterfeiting and infringement activities constitute harm to Amazon  
3 and Amazon’s reputation and goodwill such that Amazon could not be made whole  
4 by any monetary award; (c) if Defendants’ wrongful conduct is allowed to continue,  
5 the public is likely to become further confused, mistaken, or deceived as to the source,  
6 origin, or authenticity of the counterfeit and infringing materials; and (d) the resulting  
7 harm to Amazon, due to Defendants’ wrongful conduct, is likely to be continuing.

8 **THIRD CLAIM FOR RELIEF**

9 *(by Amazon Technologies Against All Defendants)*

10 **False Designation of Origin and False Advertising – 15 U.S.C. § 1125(a)**

11 71. Amazon Technologies incorporates by reference the allegations of the  
12 preceding paragraphs as though set forth herein.

13 72. Amazon’s reputation for trustworthiness is at the heart of its relationship  
14 with customers. Defendants’ actions in selling counterfeit and infringing DVDs pose  
15 a threat to Amazon’s reputation because they undermine and jeopardize customer trust  
16 in Amazon products and services.

17 73. Amazon Technologies owns the Amazon Trademarks and advertises,  
18 markets, offers, and sells its products using those trademarks described above and uses  
19 the trademarks to distinguish its products from the products and related items of others  
20 in the same or related fields.

21 74. Because of Amazon’s long, continuous, and exclusive use of the Amazon  
22 Trademarks, they have come to mean, and are understood by customers, end users,  
23 and the public, to signify products from Amazon.

24 75. Defendants’ wrongful conduct includes the infringement of the Amazon  
25 Trademarks in connection with Defendants’ commercial advertising, marketing,  
26 offering, distributing, and/or selling of counterfeit and infringing Amazon products in  
27 interstate commerce.

28 76. In advertising, marketing, offering, distributing, and selling products

1 bearing counterfeit and infringing versions of the Amazon Trademarks, Defendants  
2 have used, and on information and belief continue to use, the trademarks referenced  
3 above to compete unfairly with Amazon and to deceive customers. Upon information  
4 and belief, Defendants' wrongful conduct misleads and confuses customers and the  
5 public as to the origin and authenticity of the goods and services advertised, marketed,  
6 offered, distributed, or sold in connection with the Amazon Trademarks and  
7 wrongfully trades upon Amazon's goodwill and business reputation.

8         77. Defendants' conduct constitutes (a) false designation of origin, (b) false  
9 or misleading description, and (c) false or misleading representation that products  
10 originate from or are authorized by Amazon, all in violation of 15 U.S.C.  
11 § 1125(a)(1)(A).

12         78. Defendants' acts also constitute willful false statements in connection  
13 with goods and/or services distributed in interstate commerce in violation of 15 U.S.C.  
14 § 1125(a)(1)(B).

15         79. Amazon is entitled to an injunction against Defendants, their officers,  
16 agents, representatives, servants, employees, successors and assigns, and all other  
17 persons in active concert or participation with them, as set forth in the Prayer for Relief  
18 below. Defendants' acts have caused irreparable injury to Amazon. On information  
19 and belief, that injury is continuing. An award of monetary damages alone cannot fully  
20 compensate Amazon for its injuries, and thus Amazon lacks an adequate remedy at  
21 law.

22         80. Amazon is further entitled to recover Defendants' profits, Amazon's  
23 damages for its losses, and Amazon's costs to investigate and remediate Defendants'  
24 conduct and bring this action, including its attorneys' fees, in an amount to be  
25 determined. Amazon is also entitled to the trebling of any damages award as allowed  
26 by law.

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1 **FOURTH CLAIM FOR RELIEF**

2 *(by Amazon Content and Amazon Technologies Against All Defendants)*

3 **Violation of UCL, Bus. & Prof. Code § 17200, et seq.**

4 81. Plaintiffs incorporate by reference the allegations of the preceding  
5 paragraphs as though set forth herein.

6 82. Defendants' advertising, marketing, offering, distribution, and sale of  
7 DVDs that bear and/or include Amazon Trademarks without authorization constitute  
8 an unfair method of competition and unfair and deceptive acts or practices in the  
9 conduct of trade or commerce, in violation of the UCL.

10 83. Defendants' advertising, marketing, offering, distribution, and sale of  
11 counterfeit DVDs harm the public interest by deceiving customers about the  
12 authenticity, origins, and sponsorship of the products.

13 84. Defendants' advertising, marketing, offering, distribution, and sale of  
14 counterfeit DVDs directly and proximately cause harm to and tarnish Plaintiffs'  
15 reputations and brands, and damage their business and property interests and rights.

16 85. Accordingly, Plaintiffs seek to enjoin further violations of the UCL and  
17 recover from Defendants their attorneys' fees and costs.

18 **VI. PRAYER FOR RELIEF**

19 WHEREFORE, Plaintiffs respectfully pray for the following relief:

20 A. That the Court enter an order permanently enjoining Defendants, their  
21 officers, agents, representatives, servants, employees, successors, and assigns, and all  
22 others in active concert or participation with them, from:

- 23 (i) importing, manufacturing, producing, distributing, circulating,  
24 offering to sell, selling, advertising, promoting, or displaying any  
25 product or service using any simulation, reproduction, counterfeit,  
26 copy, or colorable imitation of the Amazon Copyrights or the  
27 Amazon Trademarks, or which otherwise infringes the Amazon  
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1 Copyrights or Amazon Trademarks, on any platform or in any  
2 medium; and

3 (ii) assisting, aiding, or abetting any other person or business entity in  
4 engaging in or performing any of the activities referred to in  
5 subparagraph (i) above;

6 B. That the Court enter an order requiring the respective registrars for the  
7 Piracy Websites' domains, as well as all others who receive notice of the Court's  
8 order, to transfer these domain names and any additional domain names found to be  
9 associated with Defendants' operation of the Piracy Websites to a registrar to be  
10 appointed by Plaintiffs to re-register the domain names in Plaintiffs' names, or the  
11 name(s) of their designee(s), and under Plaintiffs' ownership;

12 C. That the Court enter judgment in Plaintiffs' favor on all claims brought  
13 by them;

14 D. That the Court enter an order pursuant to 17 U.S.C. § 503 impounding  
15 and permitting destruction of all products infringing the Amazon Trademarks and/or  
16 Amazon Copyrights or that otherwise infringe Amazon's IP, and any related  
17 materials, including business records and materials used to reproduce any counterfeit  
18 and/or infringing products, in Defendants' possession or under their control,  
19 including, but not limited to, any infringing products and related materials identified  
20 during discovery and Amazon's continued investigation;

21 E. That the Court enter an order requiring Defendants to provide Plaintiffs  
22 a full and complete accounting of all amounts due and owing to Plaintiffs as a result  
23 of Defendants' unlawful activities;

24 F. That the Court enter an order requiring Defendants to pay all general,  
25 special, and actual damages which Amazon has sustained, or will sustain, as a  
26 consequence of Defendants' unlawful acts, plus Defendants' profits from the unlawful  
27 conduct described herein, together with its statutory damages, and that such damages  
28

1 be enhanced, doubled, or trebled as provided for by 15 U.S.C. § 1117, 17 U.S.C. §  
2 504, the UCL, or otherwise allowed by law;

3 G. That the Court enter an order requiring Defendants to pay the maximum  
4 amount of prejudgment interest authorized by law;

5 H. That the Court enter an order requiring Defendants to pay the costs of  
6 this action and Plaintiffs' reasonable attorneys' fees incurred in prosecuting this  
7 action, as provided for by 15 U.S.C. § 1117, 17 U.S.C. § 505, the UCL, or otherwise  
8 allowed by law;

9 I. That the Court enter an order requiring that financial institutions,  
10 including online payment systems and payment companies, restrain and transfer to  
11 Plaintiffs all amounts arising from Defendants' unlawful counterfeiting and infringing  
12 activities as set forth in this lawsuit, up to a total amount necessary to satisfy monetary  
13 judgment in this case;

14 J. That the Court grant Plaintiffs such other, further, and additional relief  
15 as the Court deems just and equitable.

16

17 DATED: August 22, 2023

DAVIS WRIGHT TREMAINE LLP  
SCOTT COMMERSON  
ADRIAN VALLENS

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By: /s/ Scott R. Commerson  
Scott R. Commerson

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*Attorneys for Plaintiffs*  
AMAZON TECHNOLOGIES, INC. and  
AMAZON CONTENT SERVICES, LLC

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