

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS

**SYDNEY NICOLE LLC
AND SYDNEY NICOLE
GIFFORD,**

Plaintiffs,

v.

**ALYSSA SHEIL LLC AND
ALYSSA SHEIL,**

Defendants.

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§
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§

CIVIL ACTION NO.:

1:24-cv-423

JURY

**EXHIBIT
A
TO
COMPLAINT**

EXHIBIT A

Side-by-Side Comparison of Plaintiffs' Posts and Infringing Material Posted by Defendants*


*Since Defendants' posting of some of the content herein, some posts have been removed by the respective site moderators pursuant to copyright infringement reports.

Amazon Photo Posts

Plaintiffs:

 **Sydney Nicole**
Earns Commissions



 8
my must have lounge set + arched mirror <3 size reference: I'm 5'2" and 115 and size up to M in this set for a comfy fit!
Posted 24 days ago



ANRABESS
ANRABESS Women's 2 Piece Outfits Long Sleeve Cable...
\$55.99
FREE delivery Wednesday, December 20



CASSILANDO
CASSILANDO Arched Full Length Mirror 64" x 21"...
\$64.99
FREE delivery Wednesday, December 20

Defendants:

 **Alyssa Shell**
Earns Commissions

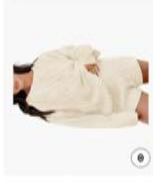
Follow



 0
cutest sweater set #Holiday2023
Posted 19 days ago



FLYDO
FLYDO Womens Slouch Sock Scrunch Socks Soft Long...
\$25.99
FREE delivery Wednesday, December 20 on orders shipped by Amazon over \$35



ANRABESS
ANRABESS Women's 2 Piece Outfits Long Sleeve Cable...
\$55.99



CUSHIONAIRE
CUSHIONAIRE Women's Hippy Genuine Suede pull...
\$79.99
FREE delivery Wednesday, December 20

URL:

https://www.amazon.com/shop/sydneynicole/photo/amzn1.shoppablemedia.v1.14eb4b38-28db-4299-8129-b90580162959?ref=aip_sf_photo_spv_ofs_photo

"KnitSet.2023.11.17" in U.S. Copyright Reg. No. VA0002380575

URL:

https://www.amazon.com/shop/alyssasheill/photo/amzn1.shoppablemedia.v1.06cfd37-8cdc-4159-8c46-178f6b5fc67c?ref=aip_sf_photo_spv_ofs_photo

Amazon Photo Posts

Plaintiffs:



Sydney Nicole
Earns Commissions

Following



♡ 8

an active set i'm drooling over + accessories that make it all a 10/10 ♡ size reference: wearing size xs top and shorts 5'2", 115lbs, 32C

Defendants:



Alyssa Sheil
Earns Commissions

Follow



♡ 3

neutral pilates look
Posted 10 days ago

URL:

https://www.amazon.com/shop/alyssasheill/photo/amzn1.shopablemedia.v1.95670b7b-6394-4cb8-980e-fa7b7e120050?ref=aip_sf_photo_spv_ofs_photo_d

URL:

https://www.amazon.com/shop/sydneynicole/photo/amzn1.shopablemedia.v1.f80fd2b0-a255-41cd-a447-7a3862f95ce0?ref=aip_sf_photo_spv_ofs_photo_d

“ActivewearSelfie.2023.01.30” in U.S. Copyright Reg. No. VA0002380575

Screencaptures taken December 15, 2023

Amazon Photo Posts

Plaintiffs:



Sydney Nicole
Earns Commissions



Alyssa Shell
Earns Commissions



17

so many of my amazon home favs in one pic 😍 these stacking tables turned out to be the perfect coffee table even though I was planning to use them as side tables! I'm in love. PS the rug is also one of my fav home finds literally ever 1000/10 recommend

Posted 6 months ago



Kevinplus
Kevinplus Wood Side Table Round Small Coffee Tables...
15% off Deal
\$141.09
List Price: \$165.99
\$31 delivery December 29 - January 2. Details



Soho House
Eat Drink Nap: Bringing the House Home
\$54.98
FREE delivery January 3 - 19. Details



Stassie
Stassie Faux Fur Throw Blanket - Soft and Elegant...
\$39.99
FREE delivery Wednesday, December 20. Details



LUXE WEAVERS
LUXE WEAVERS Modern Geometric Wave Gray 9x12...
\$270.00
FREE delivery Tuesday, December 26. Details



4

obsessed with my nesting coffee table set up
Posted 20 days ago



Kevinplus
Kevinplus Wood Side Table Round Small Coffee Tables...
15% off Deal
\$141.09
List Price: \$165.99
\$31 delivery December 29 - January 2. Details

2 of 2

Defendants:

URL:

https://www.amazon.com/shop/sydneynicole/photo/amzn1.shopablemedia.v1.80cd49345-279b-48f0-9f2a-16d0312fb6ef?ref=aip_sf_photo_ons_photo_d

"Coffee Tables.2023.06.14" in U.S. Copyright Reg. No. VA0002380575

URL:

https://www.amazon.com/shop/alyssasheill/photo/amzn1.shopablemedia.v1.201896e6-d2c8-465a-aa53-bd040f7e6ed1?ref=aip_sf_photo_ufs_photo_d

Amazon Photo Posts

Plaintiffs:



Sydney Nicole
Earns Commissions



Alyssa Sheil
Earns Commissions



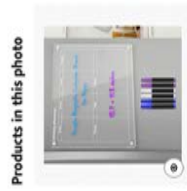
Defendants:



25

my essential acrylic calendars for meal planning!!! available in weekly or monthly styles

Posted 24 days ago



NPPLUS
NPPLUS Acrylic Magnetic Dry Erase Board Calendar for...
\$14.98
FREE delivery Wednesday, December 20 on orders shipped by Amazon over \$35



9

acrylic fridge calendar

Posted 15 days ago



AITEE
AITEE Acrylic Magnetic Weekly Calendar for Fridge...
25% off Deal
\$14.24
List Price: \$18.99
FREE delivery Wednesday, December 20 on orders shipped by Amazon over \$35

URL:

https://www.amazon.com/shop/sydneynicole/photo/amzn1.shoppablemedia.v1.ce629fbc-4109-4382-9acb-e2fbee9f4c8?ref=aip_sf_photo_spv_ons_photo_d

“FridgePlanner.2023.11.21” in U.S. Copyright Reg. No. 0002380575

URL:


https://www.amazon.com/shop/alyssasheil/photo/amzn1.shoppablemedia.v1.a4529448-fe18-4fe3-af11-60f260dca3ad?ref=aip_sf_photo_spv_ofs_photo_d

Amazon Photo Posts

Plaintiffs:

Sydney Nicole
Exams Commissioners

1 of 2



Living room favorites 🏡 this rug is a MUST. It's not too fluffy, easy to clean, and super durable even with pets! Plus the wave design is perfection. #inspire #home
Posted 5 months ago

Products in this photo

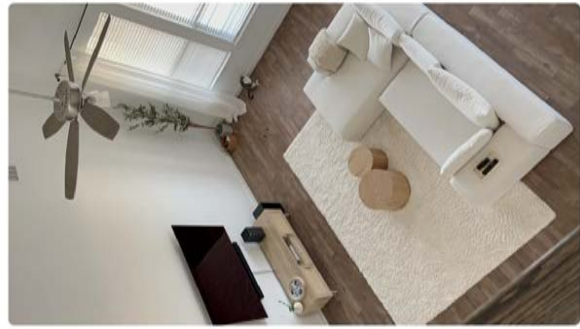
- kevinplus** Kevinplus Wood Side Table Round Small Coffee Tables...
\$141.09
15% off Deal
List Price: \$165.00
FREE delivery December 29 - January 2. Details
- DCLRN** DCLRN Small End Table, c Table End Table for...
\$35.99
FREE delivery Wednesday, December 20
- Soho House** Eat Drink Nap: Bringing the House Home.
\$54.98
FREE delivery January 3 - 19. Details
- Stassie** Stassie Faux Fur Throw Blanket - Soft and Elegant...
\$39.99
FREE delivery Wednesday, December 20

URL: https://www.amazon.com/shop/sydneynicole/photo/amzn1.shoppablemedia.v1.d15a1135-f077-4acd-b934-401e5b70a899?ref=aip_sf_photo_spv_ons_photo_d
 "LivingRoomOverview.2023.06.17" in U.S. Copyright Reg. No. VA0002380575

Defendants:

Alyssa Sheil
Exams Commissioners

1 of 4



Products in this photo

- Santa Barbara Design...** Santa Barbara Design Studio Wood Serving Bowl, Hand...
\$24.99
FREE delivery Wednesday, December 20 on orders shipped by Amazon over \$35
- DUANYAN** Real Luxurious Natural Marble Vanity Tray Genuin...
\$69.50
FREE delivery Wednesday, December 20
- Acarya** Acarya Modern Minimalist Sofa with Extra Deep Seats...
See all buying options
- kevinplus** Kevinplus Wood Side Table Round Small Coffee Tables...
\$141.09
15% off Deal
List Price: \$165.00
FREE delivery December 29 - January 2. Details

451
my living room 🏡
Posted 2 months ago

URL: https://www.amazon.com/shop/alyssasheill/photo/amzn1.shoppablemedia.v1.5480e6e0-e22e-45d6-af90-50ed5092f096?ref=aip_sf_photo_spv_ofs_photo_d

Amazon Photo Posts

Plaintiffs:

Sydney Nicole
Earnings Commission

Following

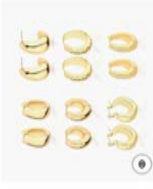


18
my favorite sweats!!! the quality is thick and lined... i swear by these!!! Size reference: I'm 5'2" and 115lbs and love and oversized fit so i grab L in the sweatpants and XL in this hoodie
Posted 2 months ago



Products in this photo

ANRABESS
ANRABESS Women Hoodies
Fleece Oversized Sweatshirt...
\$39.99
prime
FREE delivery Friday, January 26.
Order within 5 hrs 20 mins



wgoud
Wgoud Chunky Hoop
Earrings Set 14K Gold Hoo...
\$11.19
prime One-Day
FREE delivery Tomorrow, January 25



AUTOMET
AUTOMET Womens Cargo
Sweatpants Casual Baggy...
\$38.99
prime Overnight
FREE delivery Overnight
7 AM - 11 AM. Order within 5 hrs
20 mins



66
the best oversized hoodie
Posted 13 days ago



Products in this photo

AUTOMET
AUTOMET Womens Cargo
Sweatpants Casual Baggy...
\$38.99
prime
FREE delivery Saturday, January 27.
Order within 5 hrs 21 mins



Orchidays
Orchidays Women's Basic
Long Sleeve Hoodies Relax...
See all buying options

Defendants:

Alyssa Streit
Earnings Commission

Follow

URL:

https://www.amazon.com/shop/alyssasheill/photo/amzn1.shop.pablemedia.v1.5c88a484-05c4-4072-97a9-5932ac4135af?ref=aip_sf_photo_spv_ofs_photo_d

URL:
https://www.amazon.com/shop/sydneynicole/photo/amzn1.shoppablemedia.v1.dd2b5db9-faa2-45eb-9809-8d31d9ee3cfb?ref=aip_sf_photo_spv_ofs_photo_d
"HoodieSet.2023.11.23" in U.S. Copyright Reg. No. VA0002380575

Amazon Photo Posts

Plaintiffs:



Sydney Nicole
Earnings Commissions



Alyssa Sheil
Earnings Commissions



Defendants:



♥ 11

PRIME DEAL 🌟 these matching sets are antizla quality loungewear and my #1 recommended sweats!!!! I size up for an oversized comfy fit! I'm 5'2" and 115lbs wearing size L

Posted 2 months ago



ANRABESS
ANRABESS Women 2 Piece Outfits Sweatsuit Oversize...
20% off Deal
\$31.99
List Price: \$39.99
FREE delivery Wednesday, December 20 on orders shipped by Amazon over \$35



ANRABESS
ANRABESS Women 2 Piece Outfits Sweatsuit Oversize...
20% off Deal
\$31.99
List Price: \$39.99
FREE delivery Wednesday, December 20 on orders shipped by Amazon over \$35



ANRABESS
ANRABESS Women 2 Piece Outfits Sweatsuit Oversize...
20% off Deal
\$31.99
List Price: \$39.99
FREE delivery Wednesday, December 20 on orders shipped by Amazon over \$35



♥ 4

the perfect lounge set (wearing a medium)

Posted 1 month ago



AUTOMET
AUTOMET Women 2 Piece Outfits Oversized Hoodies...
15% off Top deal
\$31.99
List Price: \$36.99
FREE delivery Wednesday, December 20 on orders shipped by Amazon over \$35

URL:

https://www.amazon.com/shop/sydneynicole/photo/amzn1.shoppablemedia.v1.9eaa0227-39fe-4e27-abb6-afe8c379ee63?ref=aip_sf_photo_spv_ons_photo_d

“GreyShortsSet.2023.10.10” in U.S. Copyright Reg. No. VA0002380575

URL:

https://www.amazon.com/shop/alyssasheill/photo/amzn1.shoppablemedia.v1.5ce28d86-ba79-4dbd-bf67-8ae0d68f462e?ref=aip_sf_photo_spv_ofs_photo_d

Amazon Photo Posts

Plaintiffs:



Sydney Nicole
Earnings Commissions



♡ 7

aritzia quality sweats seriously recommend SO MUCH. I love an oversized sweat fit so I grab L in the sweatpants and XL in this sweatshirt (I'm 5'2" and 115lbs)

Posted 22 days ago



ANRABESS
ANRABESS Women Hoodies Fleece Oversized Sweatshirt...
See all buying options



AUTOMET
AUTOMET Women's Cargo Sweatpants Casual Baggy...
\$38.99
FREE delivery Wednesday, December 20

Products in this photo



♡ 6

better than aritzia loungewear #Holiday2023

Posted 19 days ago



ANRABESS
ANRABESS Women Hoodies Fleece Oversized Sweatshirt...
\$39.99
FREE delivery Wednesday, December 20

Products in this photo



AUTOMET
AUTOMET Women's Cargo Sweatpants Casual Baggy...
\$38.99

Defendants:



Alyssa Sheil
Earnings Commissions

Follow



URL:

https://www.amazon.com/shop/sydneynicole/photo/amzn1.shoppable-media.v1.eec0d8ab-3e4a-47a3-8231-820071e4ab7c?ref=aip_sf_photo_spv_ofs_photo_d

"CargoSweats.2023.11.23" in U.S. Copyright Reg. No. VA0002380575

Screencaptures taken December 15, 2023

https://www.amazon.com/shop/alyssasheill/photo/amzn1.shoppable-media.v1.5c88a484-05c4-4072-97a9-5932ac4135af?ref=aip_sf_photo_spv_ofs_photo_d

Amazon Photo Posts

Plaintiffs:



Sydney Nicole
Earns Commissions



♡ 28

home office of my dreams 🥰👏🏠 i can't believe every single thing is from amazon!!! this came together so perfectly and i recommend these amazon home finds SO much #inspire
Posted 2 months ago



Alyssa Sheil
Earns Commissions

Follow

1 of 4



LEMBERI
LEMBERI PU Leather Armless Office Desk Chair No...
\$109.99
FREE delivery December 22 - 26.
Details



Convenience Concepts
Convenience Concepts Northfield Hall Console De...
\$98.79
FREE delivery Friday, December 22
Details



nuLOOM
nuLOOM Penelope Braided Wool Area Rug, 4x6, Off-...
See all buying options



CASSILANDO
CASSILANDO Full Length Mirror 65" x 24", Floor-...
See all buying options

Products in this photo



Amazon Renewed
Apple 2022 MacBook Pro M2 Chip (13-inch, 8GB RAM, ...
\$949.00
FREE delivery Wednesday, December 20



EMIAH
EMIAH Armless Office Desks Chair with Wheels PU-...
\$229.99
FREE delivery Wednesday, December 20



SONY
Sony WH-1000XM5 The Best Wireless Noise Cancelling-...
\$322.00
FREE delivery December 21 - 27.
Details



Aotlia
Aotlia Office Desk Pad, Natural Cork & PU Leather-...
\$16.99
FREE delivery Wednesday, December 20 on orders shipped by Amazon over \$35



♡ 1

desk set up on deal #holiday2023
Posted 21 days ago

URL:

https://www.amazon.com/shop/sydneynicole/photo/amzn1.shoppablemedia.v1.3dbc480-5b5g-4277-869b-e4627c6d5305?ref=aip_sf_photo_spv_ons_photo_d

"OfficeDesk.2023.09.19" in U.S. Copyright Reg. No. VA0002380575

Screencaptures taken December 15, 2023

URL:

https://www.amazon.com/shop/alyssasheill/photo/amzn1.shoppablemedia.v1.89ba9d72-43b9-49a6-a1ce-0d2123be7f60?ref=aip_sf_photo_d

Amazon Photo Posts

Plaintiffs:



Sydney Nicole
Earns Commissions



Alyssa Sheil
Earns Commissions



♡ 4

my favorite affordable pans!!! have had these over a year now and they've held up sooooooongously
Posted 24 days ago



Products in this photo

Best Seller

CAROTE
CAROTE Pots and Pans Set
Nonstick, White Granite...
\$79.99 **45% off** **Red**
Last Shown: \$46.49
FREE delivery Wednesday,
December 20



Country Kitchen
Country Kitchen 16 Piece
Pots and Pans Set - Safe...
\$89.99



♡ 2

cookware set on deal #holiday2023
Posted 21 days ago



Products in this photo

Best Seller

CAROTE
CAROTE Nonstick Cookware
Sets, Pots and Pans Set...
\$119.99
FREE delivery Wednesday,
December 20. Order within 7 hrs 41
mins.

Defendants:

URL:

https://www.amazon.com/shop/sydneynicole/photo/amzn1.shoppablemedia.v1.5dab3fe3-7fc9-4c3d-ae47-154a5595843f?ref=aip_sf_photo_spv_ons_photo

"CreamPots.2023.11.21" in U.S. Copyright Reg. No. 0002380575

URL:

https://www.amazon.com/shop/alyssasheill/photo/amzn1.shoppablemedia.v1.9a7dc580-9601-47c5-b882-8df8aa303328?ref=ai_p_sf_photo_spv_ofs_photo_d

Amazon Photo Posts

Plaintiffs:



Sydney Nicole
Earns Commissions



♡ 28

THIS DRESS !!! absolutely unreal how well this dress hugs the right places and the ribbed material is thick, stretchy, and way comfier than I would've imagined!! I immediately ordered this dress in black too 10/70 Size ref: r'n 52" and 115lbs wearing an XS #inspire
Posted 7 months ago

Products in this photo



Caseative
Caseative Water Ripple
Pattern Curly Wave Frame...
\$12.99
FREE delivery Wednesday,
December 20 on orders shipped by
Amazon over \$35



REORIA
REORIA Women's Sexy
Lounge Slip Long Dress...
\$34.99
FREE delivery Wednesday,
December 20 on orders shipped by
Amazon over \$35

Defendants:



Alyssa Sheil
Earns Commissions

Follow



♡ 5

the iconic skims inspired maxi on deal #founditonamazon
Posted 18 days ago

Products in this photo



PUMIEY
PUMIEY Women's Slip Maxi
Dress Sexy Ribbed Bodyco...
\$34.99
FREE delivery Wednesday,
December 20 on orders shipped by
Amazon over \$35

URL:

https://www.amazon.com/shop/sydneynicole/photo/amzn1-shoppablemedia.v1.13c9a71e-3d23-4f63-82d9-15ffe8519fa8?ref=aip_sf_photo_spv_ons_photo_d

"TankDress.2023.05.4" in U.S. Copyright Reg. No. VA0002380575

URL:

https://www.amazon.com/shop/alyssasheill/photo/amzn1-shoppablemedia.v1.67ba3ffc-8afc-4d41-af5c-6d982102e5c2?ref=aip_sf_photo_spv_of_s_photo_d

Screencaptures taken December 15, 2023

Amazon Photo Posts

Plaintiffs:

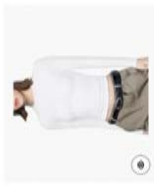
 **Sydney Nicole**
Earnings Commissions



♡ 7
this jacket!!!! 🙄🙄🙄 a winter must have to grab on sale!!!! size reference: I'm 5'2" and 115lbs wearing size S jacket, XS top, and sized up to L in the sweatpants for an oversized fit.
Posted 22 days ago



Orolay
Orolay Women's Fuzzy Fleece Jacket Fluffy Shaggy...
\$89.99
FREE delivery Wednesday, December 20



PUMIKEY
PUMIKEY Women's Long Sleeve T Shirts Crew Neck...
\$26.99
FREE delivery Wednesday, December 20 on orders shipped by Amazon over \$35



AUTOMET
AUTOMET Women's Cargo Sweatpants Casual Baggy...
\$38.99
FREE delivery Wednesday, December 20

Defendants:

 **Alyssa Shell**
Earnings Commissions

Follow



♡ 4
teddy jacket i LOVE #holiday2023
Posted 17 days ago



Orolay
Orolay Women's Fuzzy Fleece Jacket Fluffy Shaggy...
\$89.99

URL:
https://www.amazon.com/shop/sydneynicole/photo/amzn1.shoppablemedia.v1.fde435bd-0edb-4999-8191-86f57d6b8fda?ref=aip_sf_photo_spv_ofs_photo_d

"White Teddy Jacket.2023.11.23" in U.S. Copyright Reg. No. VA0002380575

Screencaptures taken December 15, 2023

URL:
https://www.amazon.com/shop/alyssasheill/photo/amzn1.shoppablemedia.v1.519c959c-6493-4984-83cb-47d5d8f05d7d?ref=aip_sf_photo_spv_ofs_photo_d

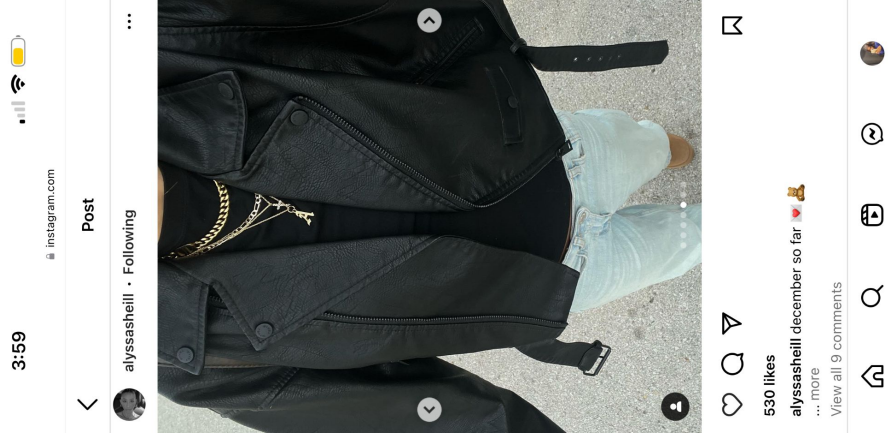
Instagram Content

Plaintiffs:



Posted 12/7/2023
"BlackOutfit.2023.12.07" in
U.S. Copyright Reg. No.
VA0002380575

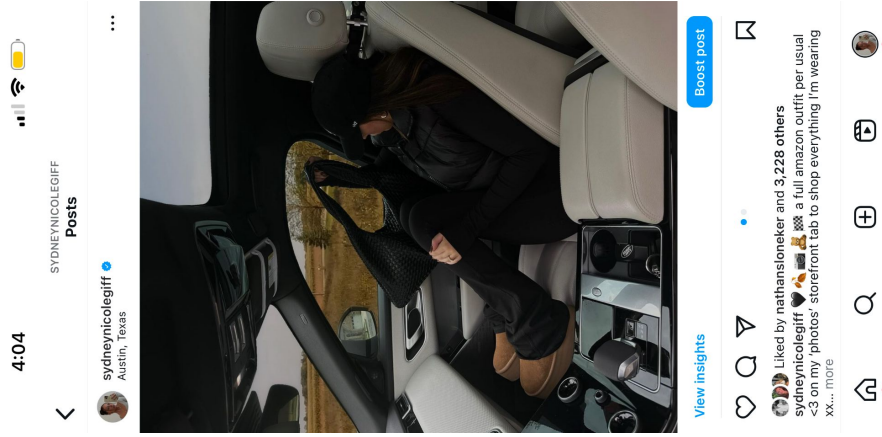
Defendants:



Posted 12/11/2023

Instagram Content

Plaintiffs:



Posted 10/27/2023
"CarSitting.2023.10.27" in
U.S. Copyright Reg. No.
VA0002380575

Defendants:



Posted 12/21/2023

Instagram Content

Plaintiffs:



URL:

https://www.instagram.com/p/Cnzh2nSuOJb/?img_index=2

Posted 1/24/2023

Photos registered as

"WhiteBodysuitOutfit.2023.01.24"

and

"WhiteBodysuitSelfie.2023.01.24"

under U.S. Copyright Reg. No.

VA0002380575



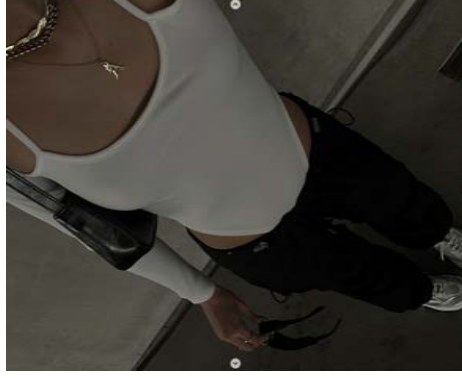
Defendants:



URL:

https://www.instagram.com/p/CoalgJypZBI/?img_index=2

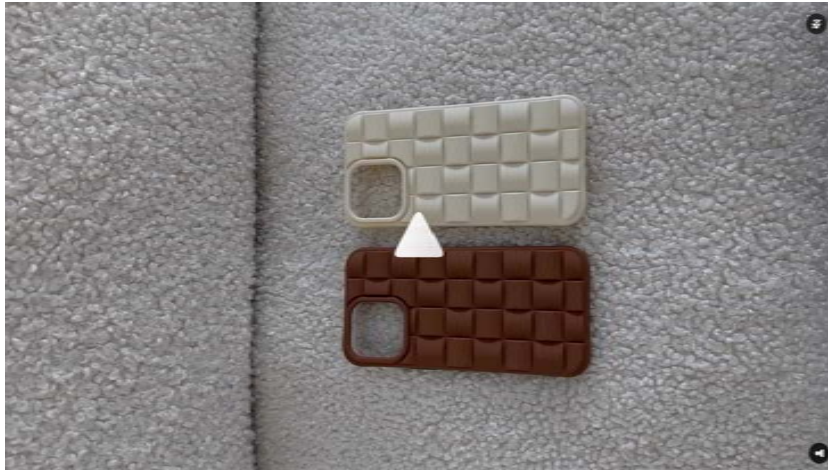
Posted 2/8/2023



Instagram Content

Plaintiffs:

@sydneynicolegiff



URL:

<https://www.instagram.com/reel/CytzXCJvPJK/>

Posted 10/22/2023

Reg. No. PA 2-462-362,
"PhoneCases.2023.10.22"

Defendants:

@alyssasheill



URL:

<https://www.instagram.com/p/C1N-HU0Ns1y/>

Posted 12/23/2023

Instagram Content

Plaintiffs:

@sydneynicolegiff



URL:

<https://www.instagram.com/reel/CrJGIY1AQ2P/>

Posted 4/17/2023

Reg. No. PA 2-462-341,

"AcrylicPanner.2023.04.17"

Defendants:

@alyssasheill



URLs:

<https://www.instagram.com/reel/CORuwUHgnl-/>

<https://www.tiktok.com/@alyssasheill/video/7307280176403057963>

Posted 11/30/2023



im SO obsessed 🥰 link...

Instagram Content

Plaintiffs:

@sydneynicolegiff



URL:

<https://www.instagram.com/reel/C0Ag774u75Z/>

Reg. No. VA 2380575

"TeddyChair.2023.10.10",

"CreamPots.2023.11.21",

"DetachablePans.2023.10.10",

"BedBench.2023.12.12",

"WaveMirror.2023.11.21",

etc.

Posted: 11/23/2023

Defendants:

@alyssasheil

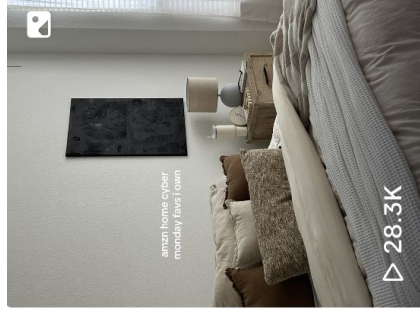


URLs:

<https://www.instagram.com/reel/C0C239qJyPq/>

<https://www.tiktok.com/@alyssasheil/photo/7305488401543728427>

Posted 11/24/2023



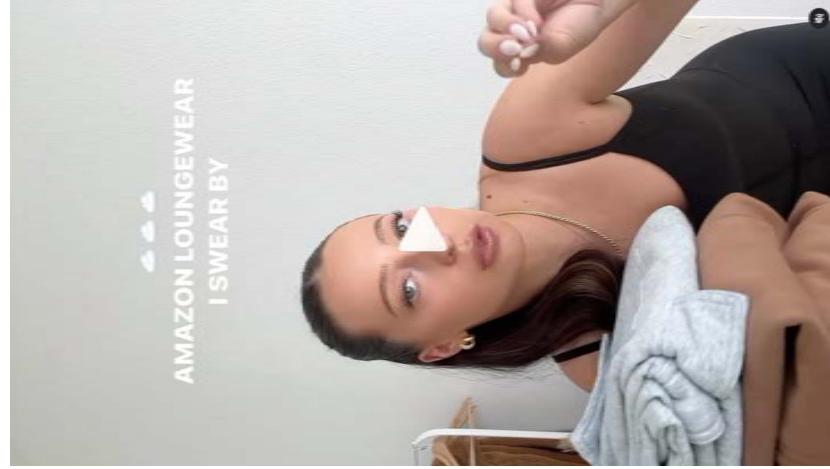
▶ 28.3K

all linked on my amzn

Instagram Content

Plaintiffs:

@sydneynicolegiff



URL:

<https://www.instagram.com/reel/CyR12FJOfpK/>

Posted 10/11/2023

Reg. No. PA 2-462-357, "Loungewear.2023.10.11"

Defendants:

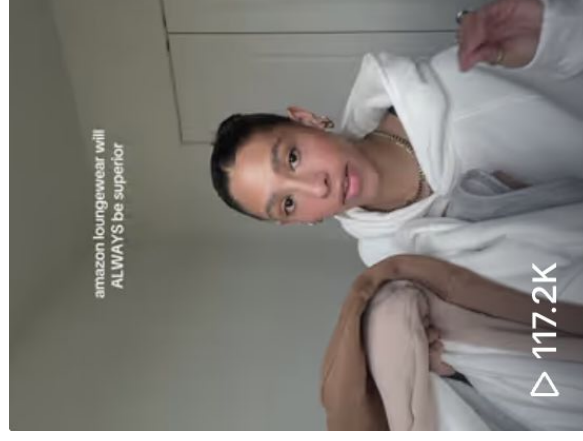
URLs:

<https://www.instagram.com/reel/Cz9He2dA9vc/>

<https://www.tiktok.com/@alyssasheil/video/7303265638527569194>

Posted 11/22/2023

@alyssasheil



the highest quality & mo...

Instagram Content

Plaintiffs:

@sydneynicolegiff



URL: <https://www.instagram.com/reel/Cp8KPYGgJNO/>
Posted: 3/18/2023
Reg. No. PA 2-462-360,
"MakeupBag.2023.03.18"

Defendants:

@alyssasheill



URL: https://www.instagram.com/reel/CznD8_WtBQI/
Posted 11/13/2023

Instagram Content

Plaintiffs:

@sydneynicolegiff



URL:

<https://www.instagram.com/reel/Cy1lBztOZeg/>

Posted: 10/10/2023

Reg. No. PA 2-462-375,

"TheTox.2023.10.19"

Defendants:

@alyssasheill



URLs:

<https://www.instagram.com/reel/CzMwfXcp4Ab/>

<https://www.tiktok.com/@alyssasheill/video/7297352892573338926>

Posted 11/3/2023

Instagram Content

Plaintiffs:

@sydneynicolegiff



URL:

<https://www.instagram.com/reel/Cs9lfPCgc84/>

Reg. No. PA 2-462-364,
"Olive Tree: 2023.06.01"

Posted: 6/1/2023

Defendants:

@alyssasheil

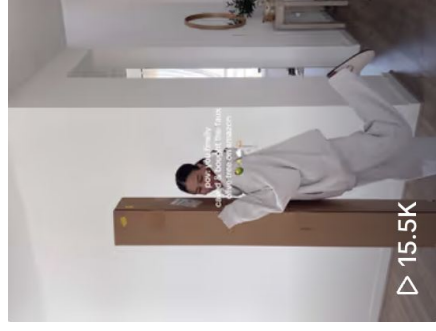


URLs:

<https://www.instagram.com/reel/CwxILbAq0Lp/>

<https://www.tiktok.com/@alyssasheil/video/727499024098350212>

Posted 9/4/2023



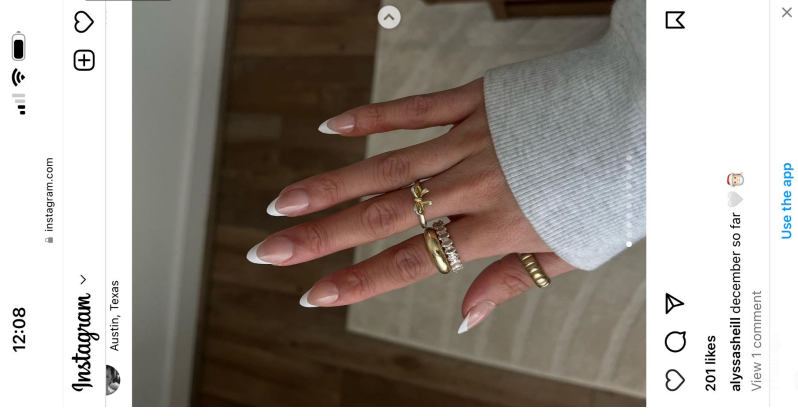
on my amazon sf ! 🍌 ...

Instagram Content

Plaintiffs:



Defendants:

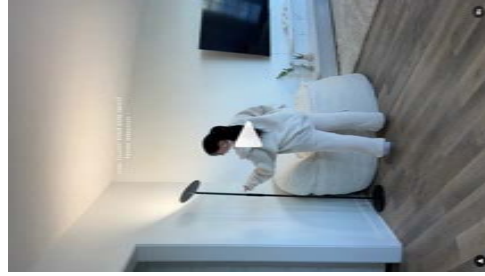


Posted 12/17/2023
"BowNails.2023.12.16" in U.S. Copyright Reg. No.
VA0002380575

Posted 12/21/2023

Instagram Content

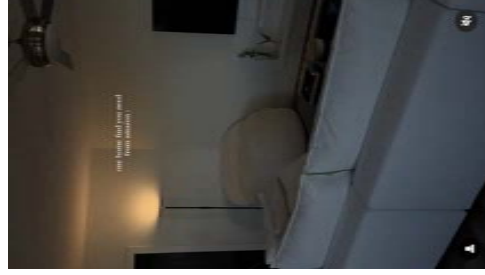
Plaintiffs:



Defendants:



Plaintiffs:



Defendants:



Plaintiffs:



Defendants:



Plaintiffs' URL:

<https://www.instagram.com/reel/CoGDX2AgZ1E/>

Posted 1/31/2023

Reg. No. PAu-4-211-810, "One Home Find You Need From Amazon"

Defendants' URL:

<https://www.instagram.com/reel/CyRYnDypxCk/>
Posted 10/11/2023

TikTok Content

Plaintiffs:

@sydneynicolegiff



URL:

<https://www.instagram.com/reel/C0Ag774u75Z/>

Posted 11/23/2023

Reg. No. VA 2380575

"TeddyChair.2023.10.10",

"CreamPots.2023.11.21",

"DetachablePans.2023.10.10",

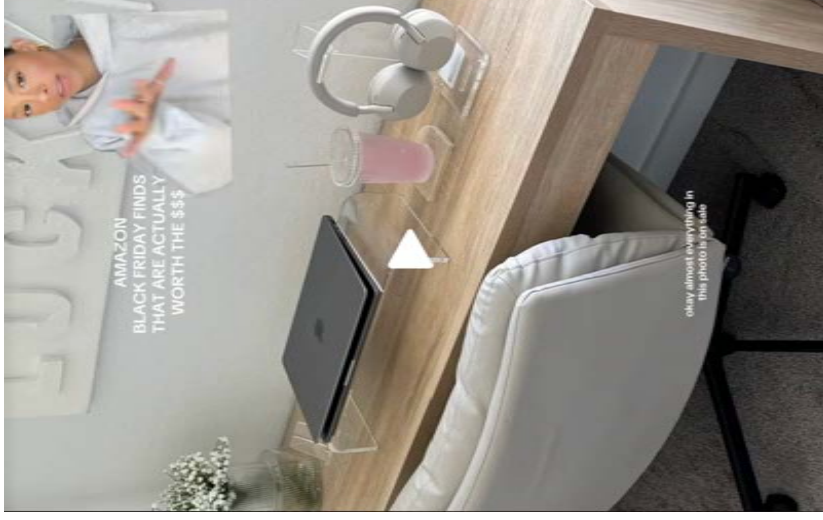
"BedBench.2023.12.12",

"WaveMirror.2023.11.21",

etc.

Defendants:

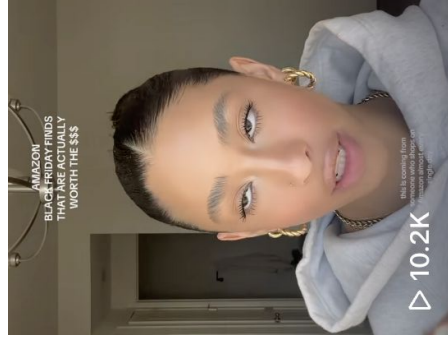
@alyssasheil



URL:

<https://www.tiktok.com/@alyssasheil/video/73045137818223873322>

Posted 11/24/2023

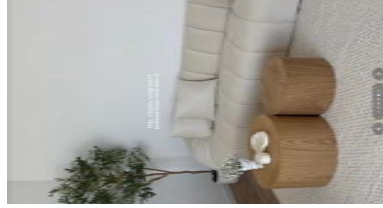
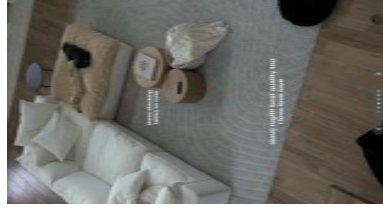
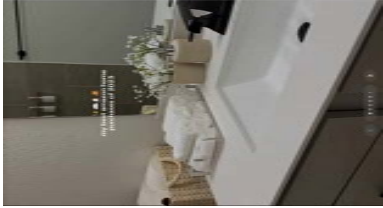


allll linked on my amazon ...

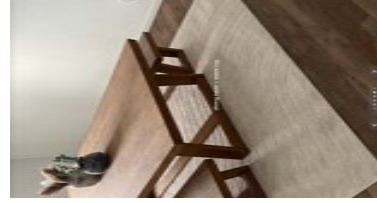
10.2K

TikTok Content

Plaintiffs:



Defendants:



URL: <https://www.tiktok.com/@sydneynicolegiff/photo/7311855271507283231>

Posted 12/12/2023

Reg. No. VA0002380575, BestHomePurchases.2023.12.12,
GuestBathroom.2023.06.05, CoffeeTumbler.2023.12.12, CreamPots.2023.11.21,
FridgePlanner.2023.11.21, LivingRoomOverview.2023.06.17,
OfficeCouch.2023.12.12, OfficeTeddyChair.2023.11.23

URL: <https://www.tiktok.com/@alyssasheil/photo/7312484543901060394>

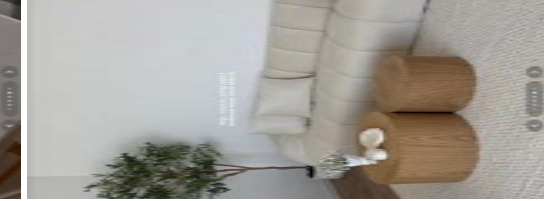
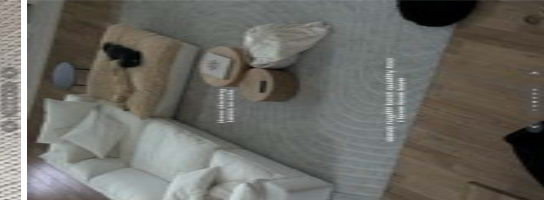
Posted 12/14/2023

TikTok Content

Plaintiffs:



Defendants:



URL: <https://www.tiktok.com/@alyssasheil/photo/7315864448411979054>
Posted 12/23/2023

URL: <https://www.tiktok.com/@sydneynicolegiff/photo/7311855271507283231>
Posted 12/12/2023

Reg. No. VA0002380575, BestHomePurchases.2023.12.12,
GuestBathroom.2023.06.05, CoffeeTumbler.2023.12.12, CreamPots.2023.11.21,
FridgePlanner.2023.11.21, LivingRoomOverview.2023.06.17,
OfficeCouch.2023.12.12, OfficeTeddyChair.2023.11.23

TikTok Content

Plaintiffs:



Sydney Nicole
Etern Commissionnaire

Following



444

entryway set up the exact storage ottoman stools are linked and from the brand Cortesi but I also included a few similar ones linked as well since they tend to go out of stock frequently! This set up turned out so dreamy #amazonhome

Posted 7 months ago

Defendants:



Products in this photo

1 of 3



ONEVOG
ONEVOG Bourle Storage Ottoman, Round Foot Rest...
\$109.99
FREE delivery February 7 - 8.
Details



Meridian Furniture
Meridian Furniture 153 Cream Aphia Collectio...
\$106.90
FREE Prime delivery Thursday, February 8. Order within 2 hrs 11 mins



Convenience Concepts
Convenience Concepts Northfield Hall Console De...
\$85.99
Prime
FREE delivery Saturday, February 3. Order within 13 hrs 56 mins



Cortesi Home
Cortesi Home Moroccan Cylindrical Storage Ottom...
\$149.99
Prime
FREE delivery Saturday, February 3. Order within 13 hrs 26 mins

URLs:

<https://www.tiktok.com/@alyssasheil/video/732582081770987857>

857

<https://www.tiktok.com/@alyssasheil/photo/7327789446294670634>

URL: <https://www.tiktok.com/@sydneynicolegiff/video/7243837431005465902>

Posted 6/12/2023

“EntryWay.2023.06.12” in U.S. Copyright Reg. No. VAu0002380575

Posted 1/19/2024, 1/25/2024

TikTok Content

Plaintiffs:



Defendants:

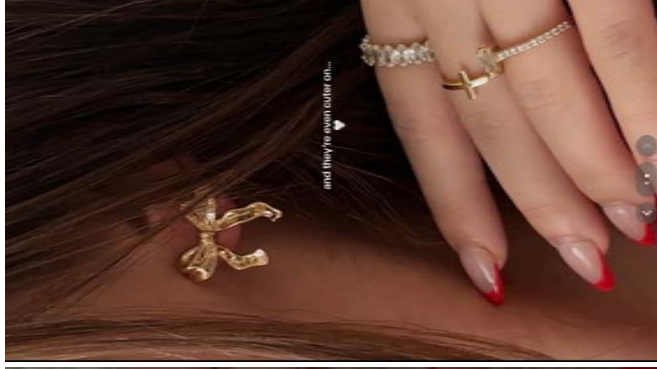


URL: <https://www.tiktok.com/@sydneynicolegiff/video/7313952802982661406>
Posted 12/18/2023
"BagandDecor.2023.12.18" in U.S. Copyright Reg. No. VA0002380575; Reg. No. PA 2-462-344, "BagsHaul.2023.12.18"

URL: <https://www.tiktok.com/@alyssasheil/video/7324469924951379243>
Posted 1/15/2024
https://www.tiktok.com/@alyssasheil/video/7348885863029427502_30
Posted 3/21/2024

TikTok Content

Plaintiffs:



URL:

<https://www.tiktok.com/@sydneynicolegiff/photo/7314461964829330719>

Posted 12/20/2023

Reg. No. VA0002380575,

"BowEarringsLayout.2023.12.19",

"BowEarringsOn.2023.10.19"

Defendants:



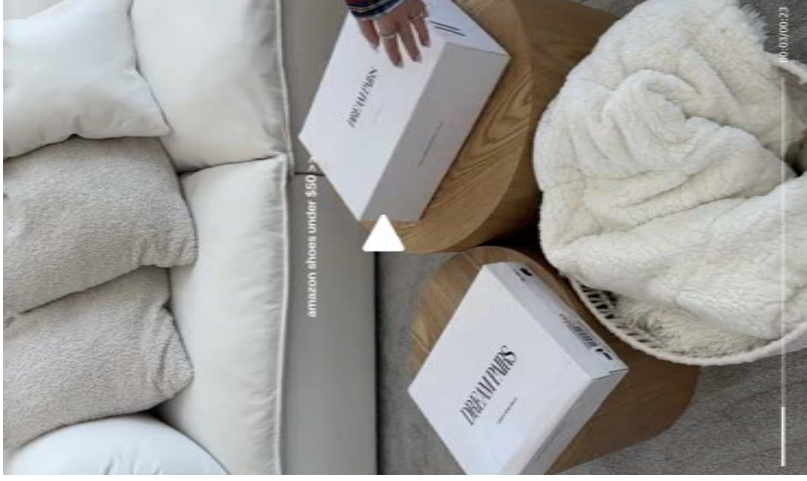
URL:

<https://www.tiktok.com/@alyssasheil/photo/7316282558306716974>

Posted 12/23/2023

TikTok Content

Plaintiffs:



URL:
<https://www.tiktok.com/@sycneynicolegiff/video/7307750514907991342>
Posted 12/1/2023
Reg. No. PA 2-462-380, "DreamPairs.2023.12.01"

Defendants:



URL:
<https://www.tiktok.com/@alyssasheil/video/7311500978111434026>
Posted 12/11/2023

TikTok Content

Plaintiffs:



URL:
<https://www.tiktok.com/@sydneynicolegiff/video/7309223406325566763>

Posted 12/5/2023
Reg. No. PA 2-462-366, "GiftsUnder50.2023.12.05"

Defendants:

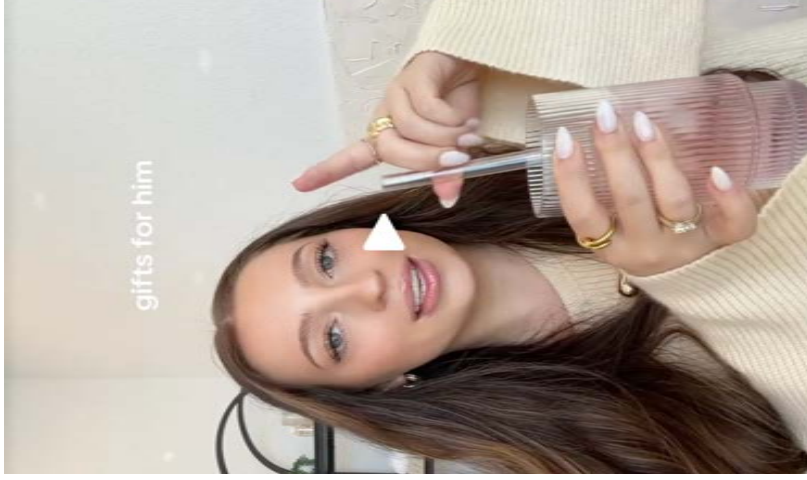
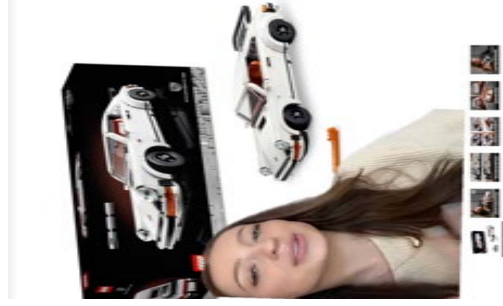


URL:
<https://www.tiktok.com/@alyssasheil/video/7309882525533408558>

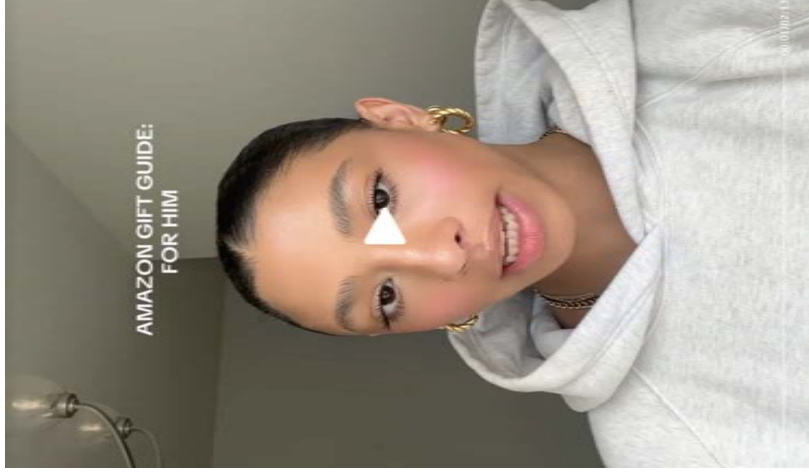
Posted 12/7/2023

TikTok Content

Plaintiffs:



Defendants:



URL: <https://www.tiktok.com/@sydneynicolegiff/video/7299960675462483246>

Posted 11/10/2023
Reg. No. PA 2-462-378, "GiftsforHim.2023.11.10"

URL: <https://www.tiktok.com/@alyssasheil/video/7308821641839103274>

Posted 12/4/2023

TikTok Content


Plaintiffs:




URL:

<https://www.tiktok.com/@sydneynicolegiff/photo/7290975812864445738>

Posted 10/17/2023
Reg. No. VA0002380575,
HoodiesLayout.2023.10.17,
KnitSetsLayout.2023.10.17,
PrimeDayOrder.2023.10.17,
PrimeOrder.2023.10.17,
RomperLayout.2023.10.17

 **sydneynicolegiff**
sydney nicole · 10-17

everything under ~recent orders<3~ on my sf 🍷🍷

 Friends

Defendants:




URL:


<https://www.tiktok.com/@alyssasheil/photo/7306964797533310250>

Posted 11/29/2023



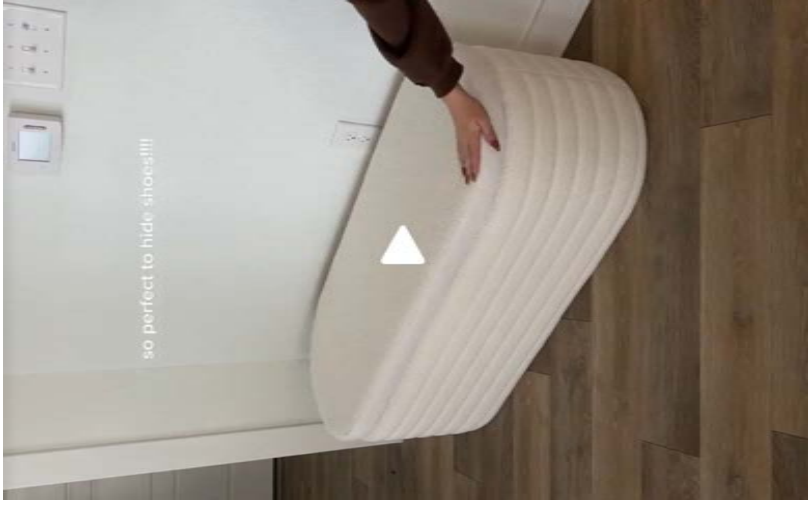
 **alyssasheil**
ALYSSA SHEIL · 11-29

under my recent orders 🍷🍷

 Follow

TikTok Content

Plaintiffs:



URL:

<https://www.tiktok.com/@sydneynicolegiff/video/71633305199489010987>

Posted 11/7/2022

Reg. No. PA 2-462-377, "TeddyBench.2022.11.07"

Defendants:



URL:

<https://www.tiktok.com/@alyssasheil/video/7301367167172250923>

Posted 11/14/2023

TikTok Content

Plaintiffs:



URL:
<https://www.tiktok.com/@sydneynicolegiff/video/71937364000666383150>

Posted 1/28/2023
Reg. No. 2-462-383, "LampSetUp.2023.01.28"

Defendants:



URL:
<https://www.tiktok.com/@alyssasheil/video/72899329444934751531>

Posted 10/14/2023

TikTok Content

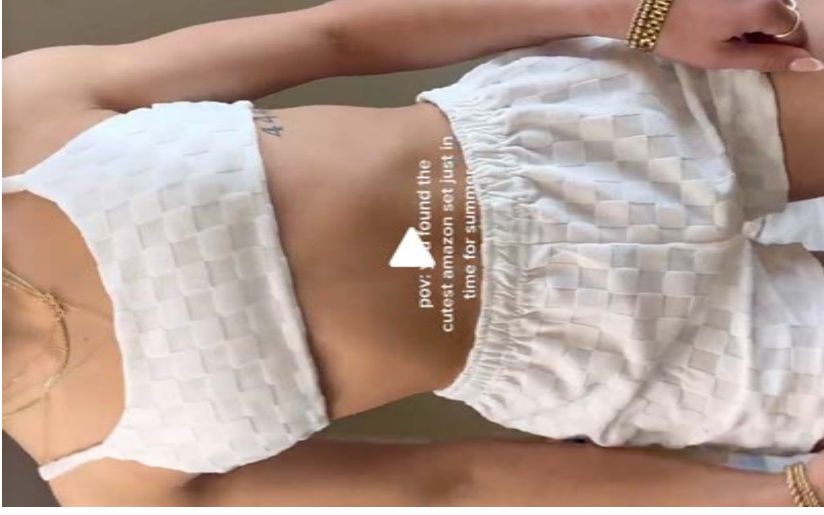
Plaintiffs:



URL: <https://www.tiktok.com/@sydneynicolegiff/video/7206330999926574378>

Posted 3/3/2023
Reg. No. PA 2-462-346, "CheckedSet.2023.03.03"

Defendants:



URL: <https://www.tiktok.com/@alyssasheil/video/7215236288507661611>

Posted 3/27/2023

TikTok Content

Plaintiffs:

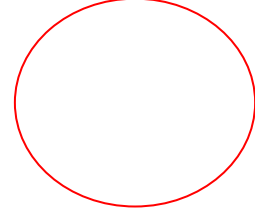


URL: https://www.instagram.com/p/CpQ8kmNunEv/?img_index=2
Posted 3/1/2023
"SkirtOutfit2.2023.03.01" in U.S. Copyright Reg. No. VA0002380575

Defendants:



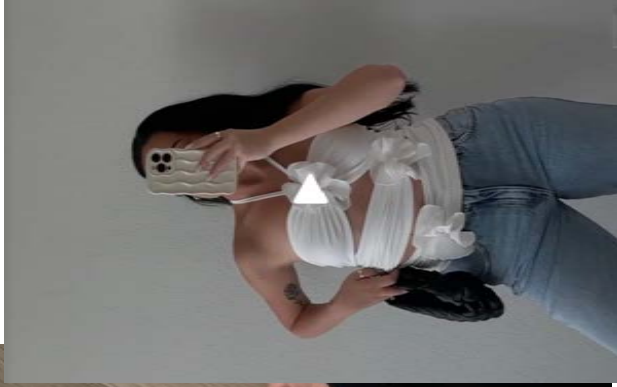
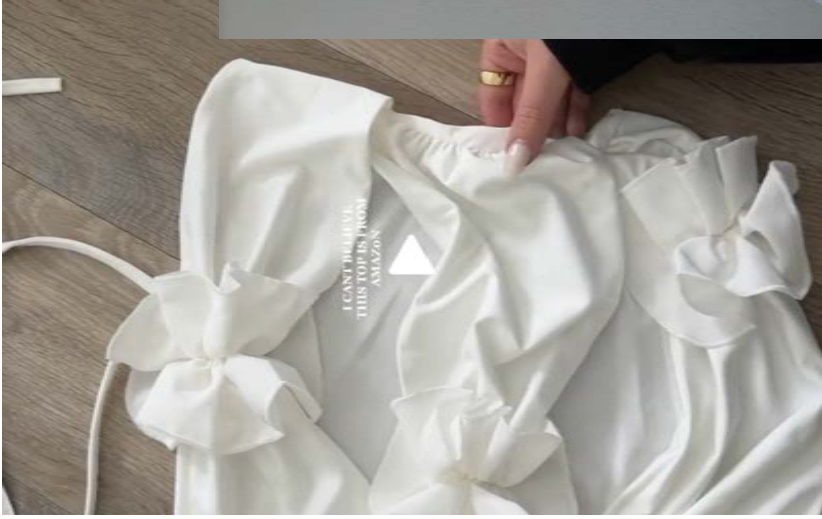
Flower clip and white boots do not come with the featured skirt and shirt set.



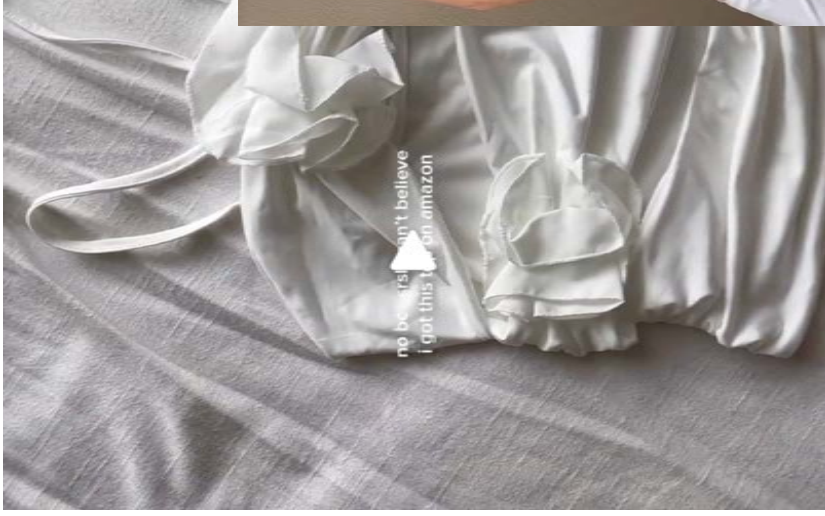
URL: <https://www.tiktok.com/@alysasheil/video/7211549035361045803>
Posted 3/17/2023

TikTok Content

Plaintiffs:



Defendants:



URL: <https://www.tiktok.com/@sydneynicolegiff/video/7235314719698160942>

Posted 5/20/2023
Reg. No. PA 2-462-385, "FlowerTop.2023.05.20"

URL: <https://www.tiktok.com/@alyssasheil/video/7236430934323547434>

Posted 5/23/2023

TikTok Content

Plaintiffs:



URL:

<https://www.tiktok.com/@sydneynicolegiff/photo/7304691302979980587>

Posted 11/23/2023

Reg. No. VA0002380575,

“KnitSet.2023.11.17”,

“HoodieSet.2023.11.23”,

“CargoSweats.2023.11.2

3”,

“BlackJacket.2023.11.23”

Defendants:



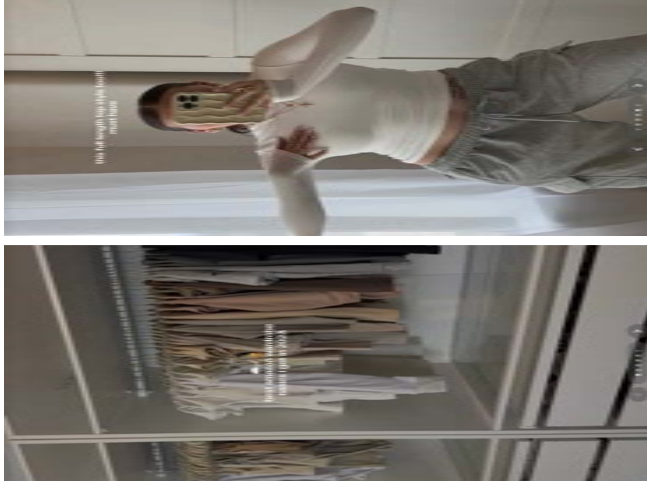
URL:

<https://www.tiktok.com/@ayssasheil/photo/7305787712320195882>

Posted 11/26/2023

TikTok Content

Plaintiffs:



URL:

<https://www.tiktok.com/@sydneynicolegiff/photo/7313213829599595807>

Posted 12/16/2023, circa 10 a.m. CT,

Reg. No. VA0002380575, "ClosetBasics.2023.12.16", "GreyDress.2023.11.17", "WhiteBag.2023.12.16", "WhiteLongSleeve.2023.11.23"

Defendants:



URL:

<https://www.tiktok.com/@alyssasheil/photo/731330577716523595051>

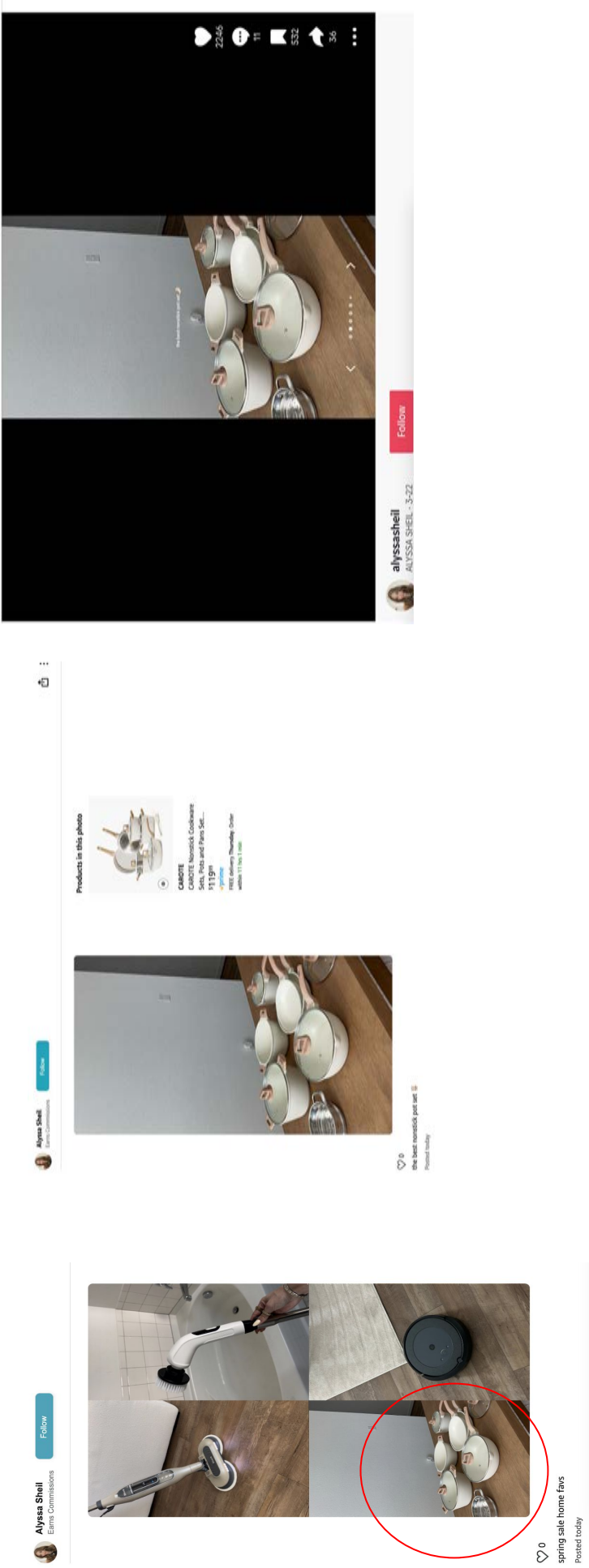
Posted 12/16/2023, circa 3 p.m. CT



Infringing Content Re-posted After Removal

Defendants posted a photo that infringes upon Plaintiffs' "CreamPots.2023.11.21" work protected by VA 0002380575 on at least seven occasions *after* the original content was removed pursuant to copyright infringement reports. The photo was reposted by Defendants on Amazon on 3/19 and 3/20 and on TikTok on 3/20, 3/21, 3/22, 3/30, and 4/15 of 2024. Original photo posts were posted 11/24/2023 and removed by on or around 2/5/2024 pursuant to copyright infringement notice.

Sample Screenshots:



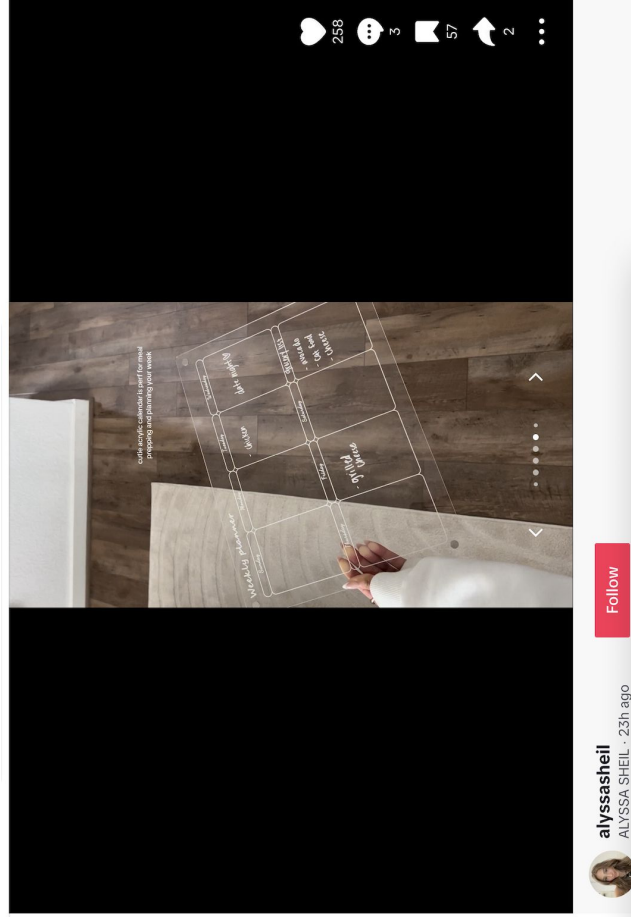
URLS:

- (1) https://www.amazon.com/shop/alyssasheill/photo/amzn1.shoppablemedia.v1.37412140-6603-408c-8851-25c89e733689?ref=aip_sf_photo_spv_ofs_mixed_d
- (2) https://www.amazon.com/shop/alyssasheill/photo/amzn1.shoppablemedia.v1.c79a8450-00da-43f2-80d2-19583924d72b?ref=aip_sf_photo_spv_ofs_photo_d
- (3) <https://www.tiktok.com/@alyssasheill/photo/7348995278285868330>
- (4) <https://www.tiktok.com/@alyssasheill/photo/7349298154615016750>
- (5) <https://www.tiktok.com/@alyssasheill/photo/7352217465255906602>
- (6) <https://www.tiktok.com/@alyssasheill/photo/7357863799107407146>
- (7) <https://www.tiktok.com/@alyssasheill/photo/7348452919420701998>

Infringing Content Re-posted After Removal

Defendants posted a photo that infringes upon Plaintiffs' "FridgePlanner.2023.11.21" work protected by VA 0002380575 on at least three occasions *after* substantially similar original content was removed pursuant to copyright infringement reports. The photos were posted by Defendants on TikTok on 3/30, 4/15, and 4/17 of 2024. Original photo post was posted 12/1/2023 and removed by on or around 2/5/2024 pursuant to copyright infringement notice.

Sample Screenshot:



URLs:

- (1) <https://www.tiktok.com/@alyssasheil/photo/7352217465255906602>
- (2) <https://www.tiktok.com/@alyssasheil/photo/7357863799107407146>
- (3) <https://www.tiktok.com/@alyssasheil/photo/7358891500744297770>

Infringing Content Re-posted After Removal

Defendants posted a photo that infringes upon Plaintiffs' "EntryWay.2023.06.12" work protected by VA 0002380575 on at least two occasions *after* substantially similar original content was removed pursuant to copyright infringement reports. The photos were posted by Defendants on TikTok on 3/30 and 4/17 of 2024. Original photo post was posted 1/19/2024 and removed by on or around 2/5/2024 pursuant to copyright infringement notice.

Screenshots:

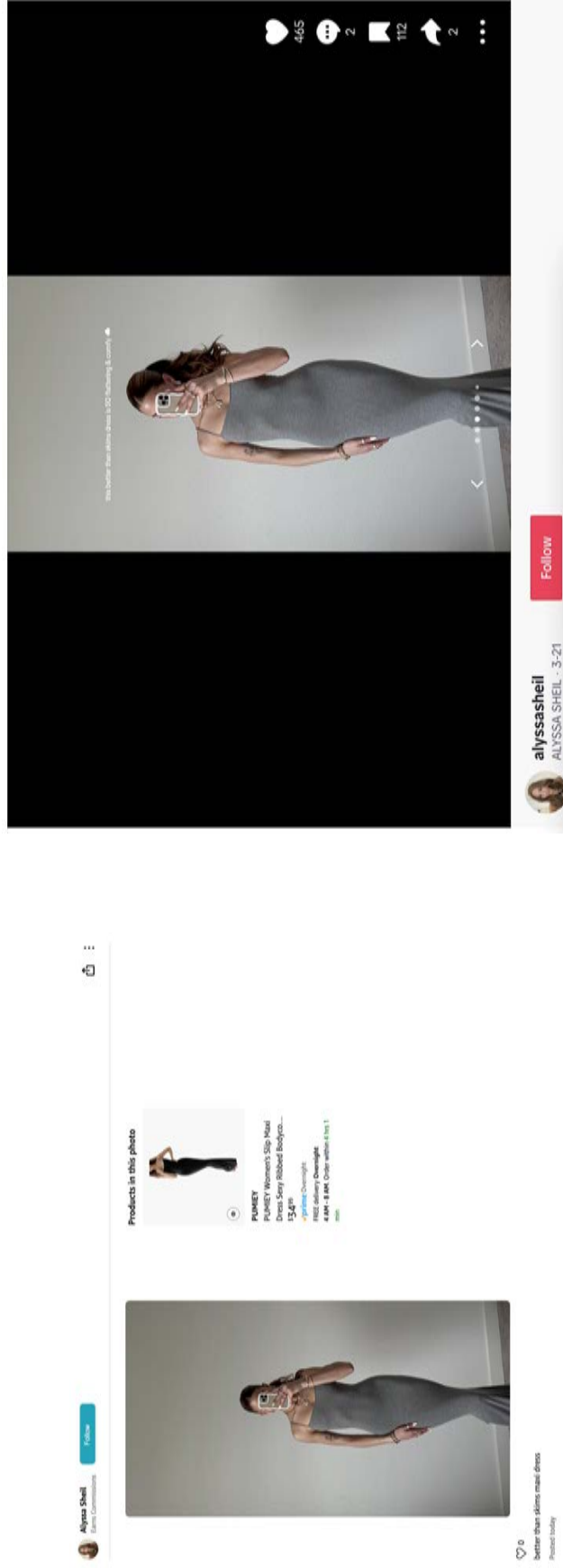


- URLs:
- (1) <https://www.tiktok.com/@alyssasheil/photo/7358891500744297770>
 - (2) <https://www.tiktok.com/@alyssasheil/photo/7352217465255906602>

Infringing Content Re-posted After Removal

Defendants posted photos that infringe upon Plaintiffs' "TankDress.2023.05.4" work protected by VA 0002380575 on at least four occasions *after* substantially similar original content was removed pursuant to copyright infringement reports. The photos were posted by Defendants on Amazon on 3/19 and on TikTok on 3/20, 3/21, and 3/31 of 2024. Original photo post was posted 12/3/2023 and removed by on or around 2/5/2024 pursuant to copyright infringement notice.

Sample Screenshots:



URLs:

- (1) https://www.amazon.com/shop/alyssasheil/photo/amzn1.shoppablemedia.v1.e4216cda-bd71-4dea-be57-2c758875b6bd?ref=aip_sf_photo_spv_ofs_photo_d
- (2) <https://www.tiktok.com/@alyssasheil/photo/7348627874930281770>
- (3) <https://www.tiktok.com/@alyssasheil/photo/7348995278285868330>
- (4) <https://www.tiktok.com/@alyssasheil/photo/7352681409393331499>

Infringing Content Re-posted After Removal

Defendants posted a photo that infringes upon Plaintiffs' "Coffee Tables.2023.06.14" work protected by VA 0002380575 after substantially similar original content was removed pursuant to a copyright infringement report. The photo was posted by Defendants on TikTok on 3/30/2024. The original photo post was posted 11/25/2023 and removed by on or around 2/5/2024 pursuant to copyright infringement notice.

Screenshot:

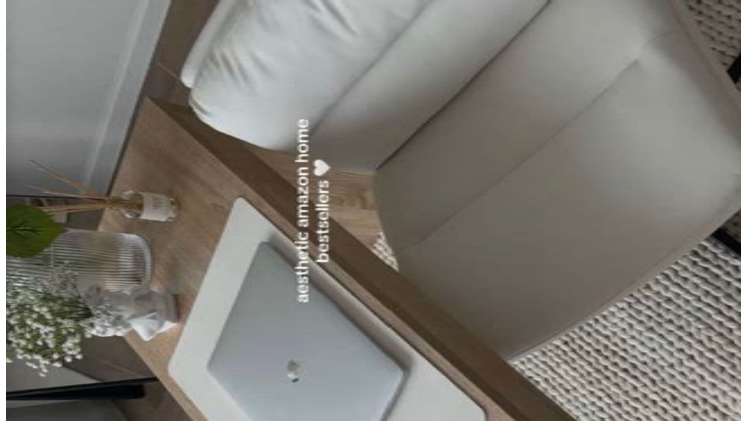


URL:
<https://www.tiktok.com/@alyssasheil/photo/7352217465255906602>

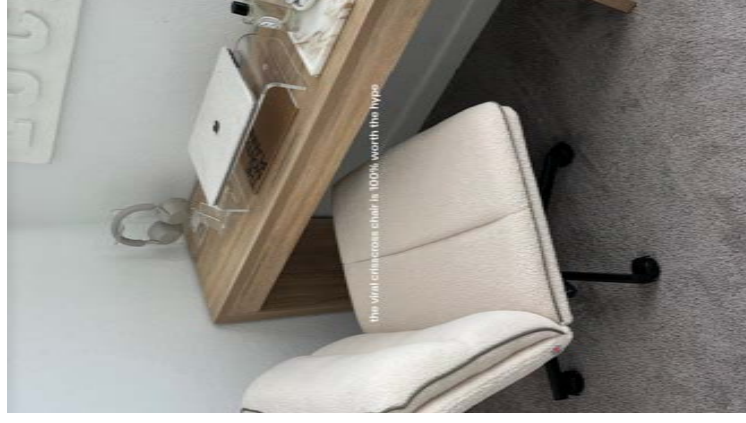
Infringing Content Re-posted After Removal

Defendants posted a photo that infringes upon Plaintiffs' "AestheticBestsellers.2023.10.30" work protected by VA 0002380575 after substantially similar original content was removed pursuant to a copyright infringement report. The photo was posted by Defendants on TikTok on 3/22/2024. The original photo post was posted 11/24/2023 and removed by on or around 2/5/2024 pursuant to copyright infringement notice.

Plaintiffs' Photo:



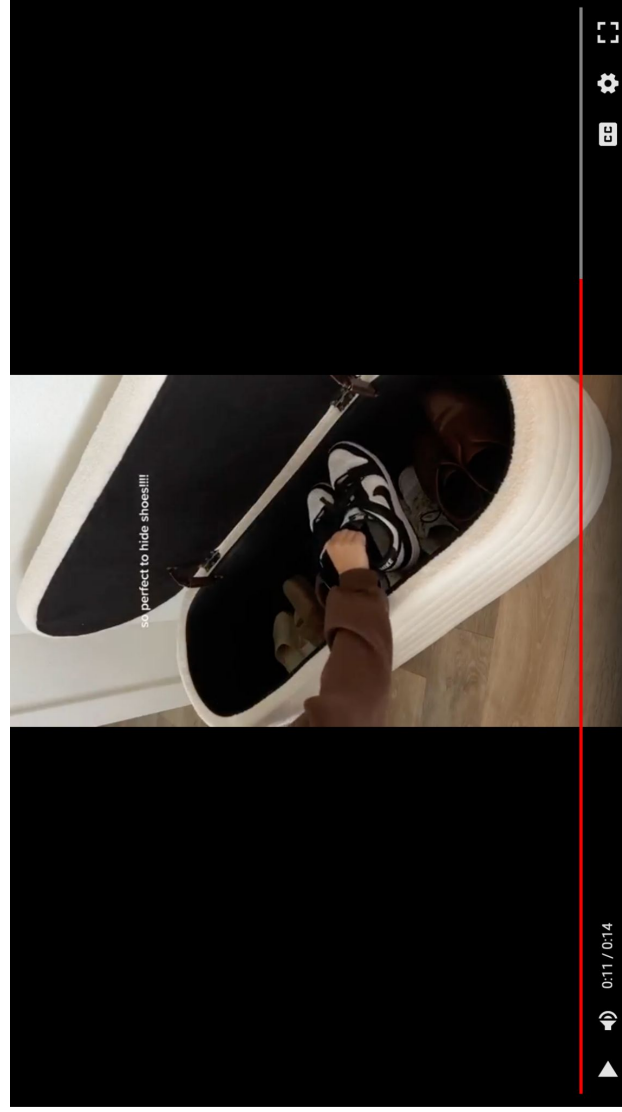
Defendants' Post:



Infringing Content Re-posted After Removal

Defendants posted a photo that infringes upon Plaintiffs' "TeddyBench.2022.11.07" work protected by PA-462-377 and two works protected by VA 0002380575 *after* substantially similar video content was removed pursuant to a copyright infringement report. The photo was posted by Defendants on TikTok on 4/17/2024. The original video post was posted 11/14/2023 and removed by on or around 2/5/2024 pursuant to copyright infringement notice.

Plaintiffs' Video:



Defendants' Post:



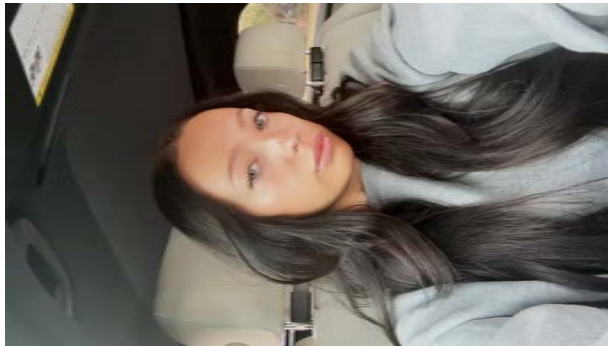
URL:
<https://www.tiktok.com/@alyssasheil/photo/7358891500744297770>

Defendants' posts before infringement of Plaintiffs:

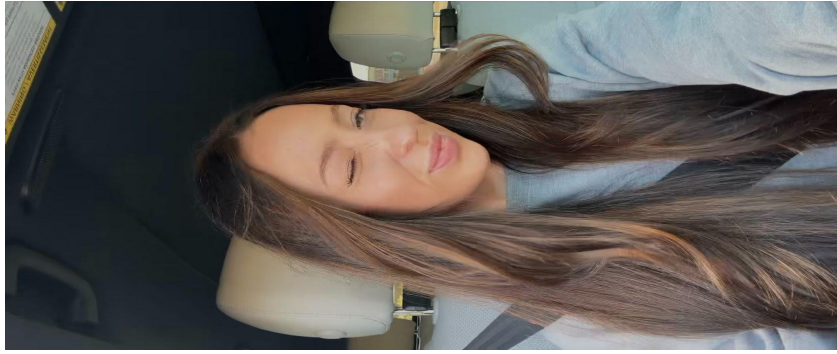


Misappropriation

Plaintiffs



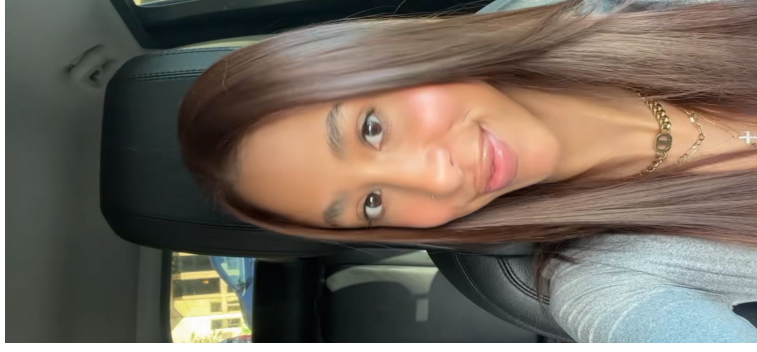
Sydney dyed her hair from black to brown on 9/27/2023 and posted the same on social media platforms



Defendants

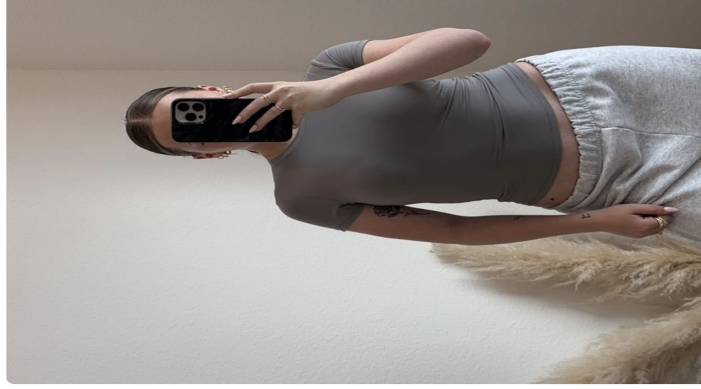


Alyssa dyed her hair from black to brown on 12/2/2023 and posted the same on social media platforms



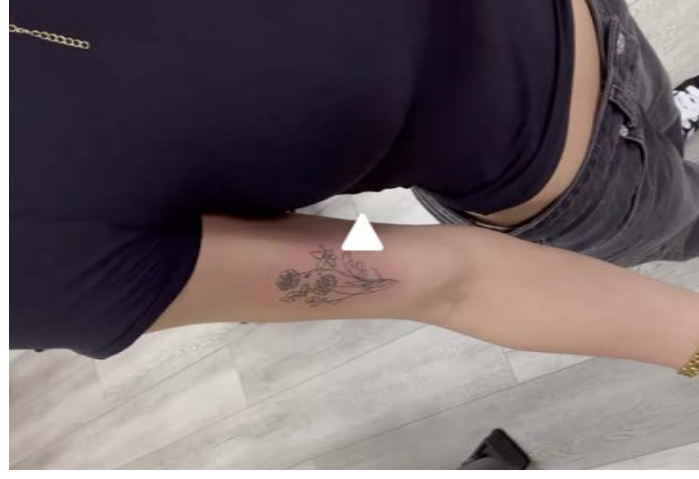
Misappropriation

Plaintiffs



Sydney posted a photo showing her flower tattoo for the first time in over six months on 1/29/2024.

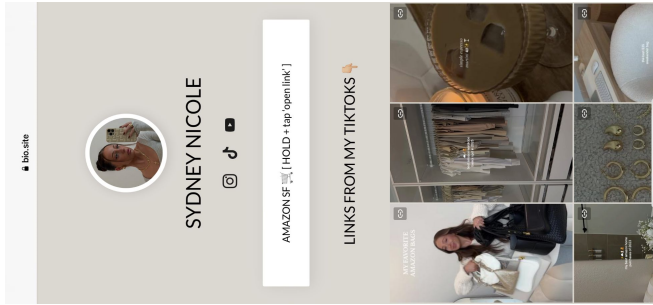
Defendants



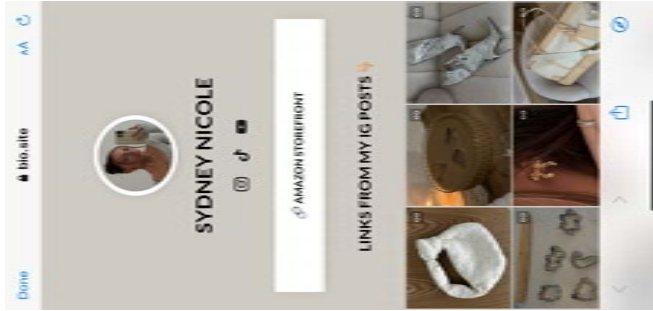
Alyssa posted a video showing a new flower tattoo she obtained on 2/9/2024.

Website

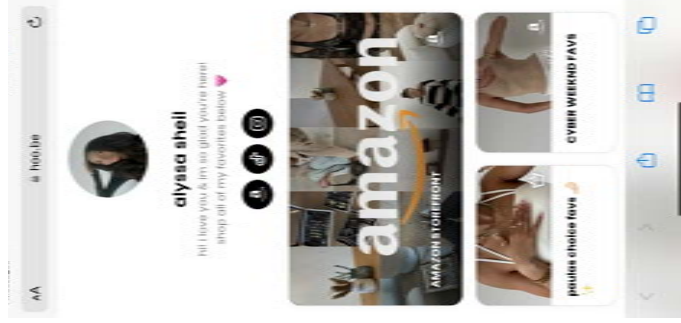
Plaintiffs' TikTok website since 5/27/2022



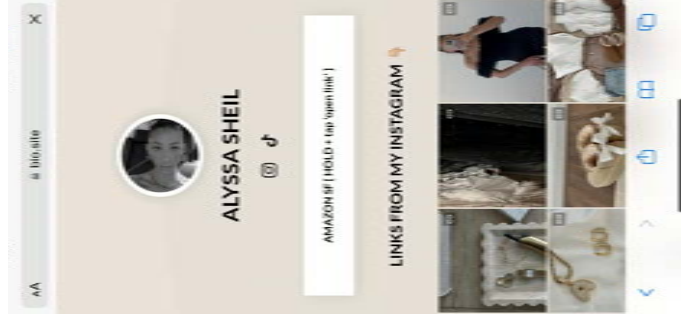
Plaintiffs' Instagram website since 5/27/2022



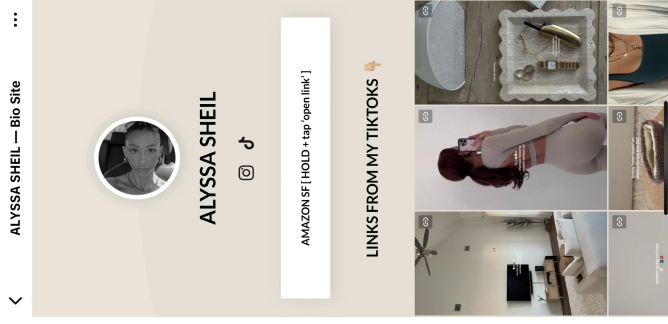
Defendants' TikTok and Instagram website until 12/15/2023



Defendants' Instagram website starting 12/15/2023



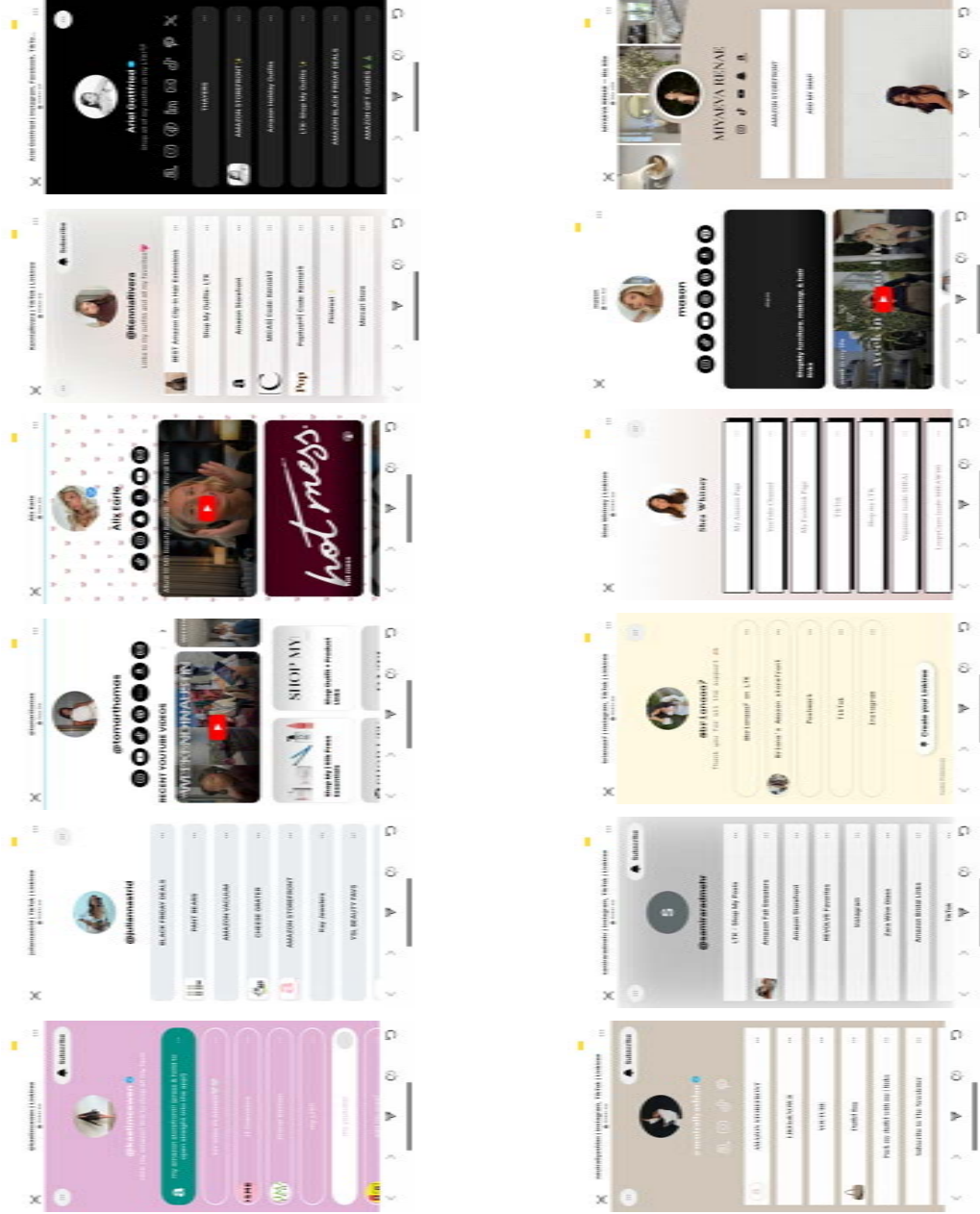
Defendants' TikTok website starting 12/15/2023



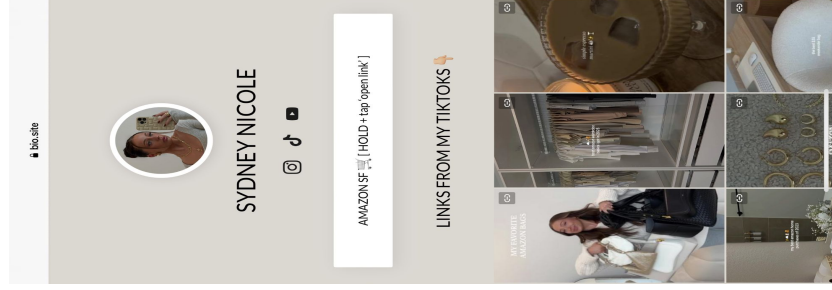
Website

Below is a sample of 12 random influencer's websites. Text, profile picture, font, background, and color scheme are all completely customizable.

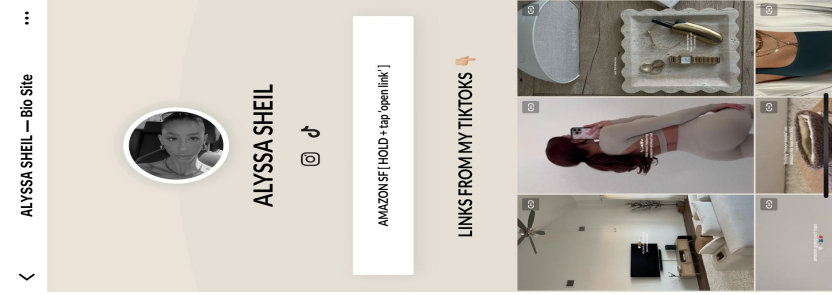
Samples:



Plaintiffs:

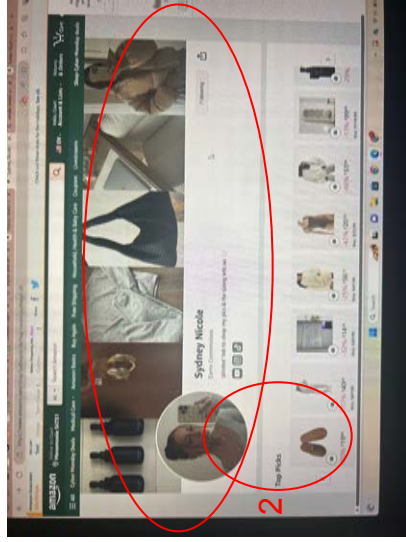


Defendants:

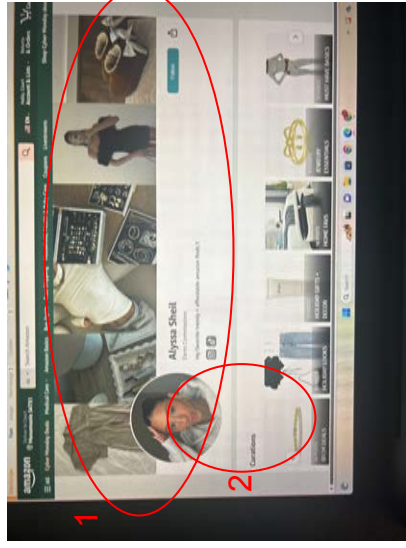


Amazon Storefront

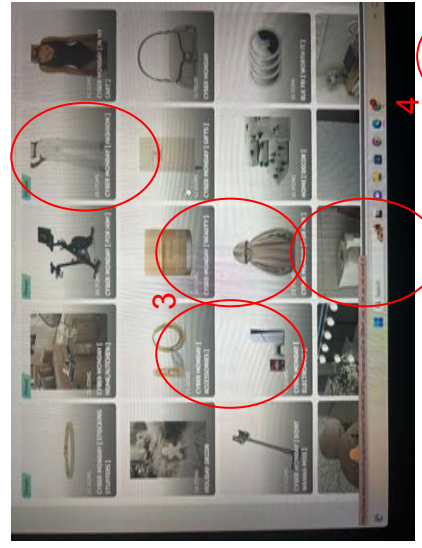
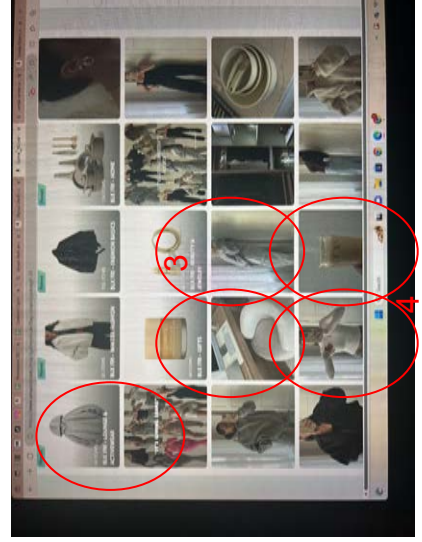
Every element on an Amazon Storefront is customizable. In the photos of Sydney's and Alyssa's storefronts taken on November 25, 2023, Defendants' Storefront includes (1) a duplicated banner, (2) profile picture (3) idea lists, and (4) posted photos.



Plaintiffs' Amazon Storefront on November 25, 2023

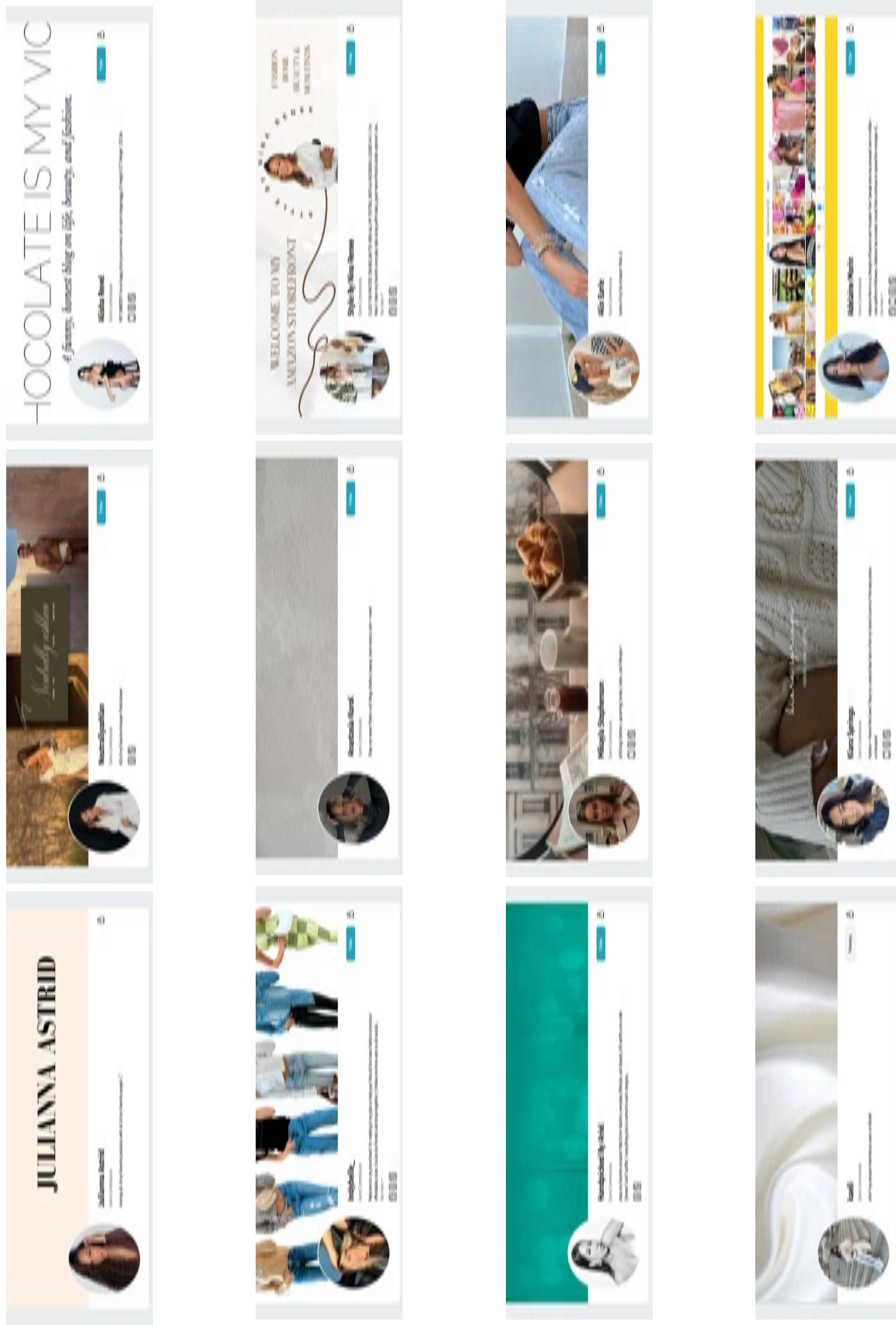


Defendants' Amazon Storefront on November 25, 2023



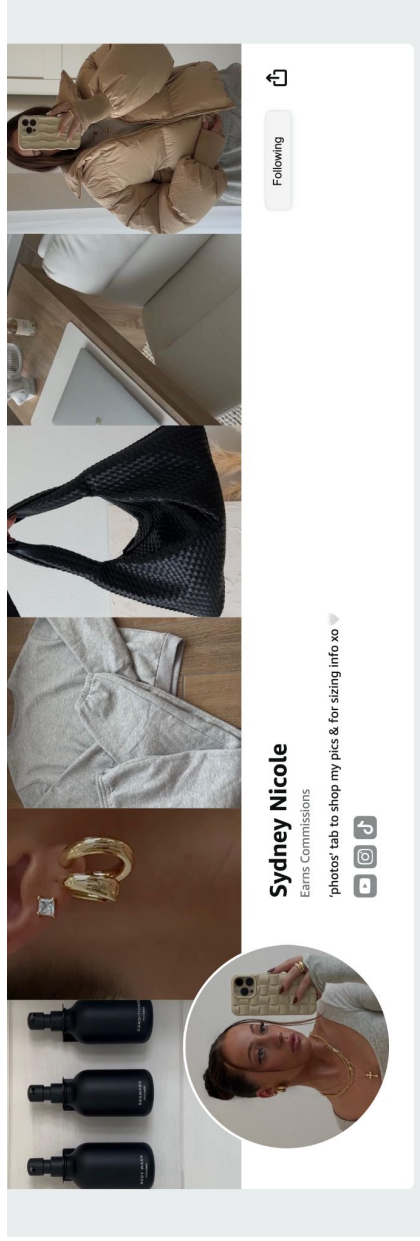
Amazon Storefront - Banner & Style

Sample of 12 random influencer's Amazon Storefront Banners. Banners can be any photo and are customizable as photos or designs with text:

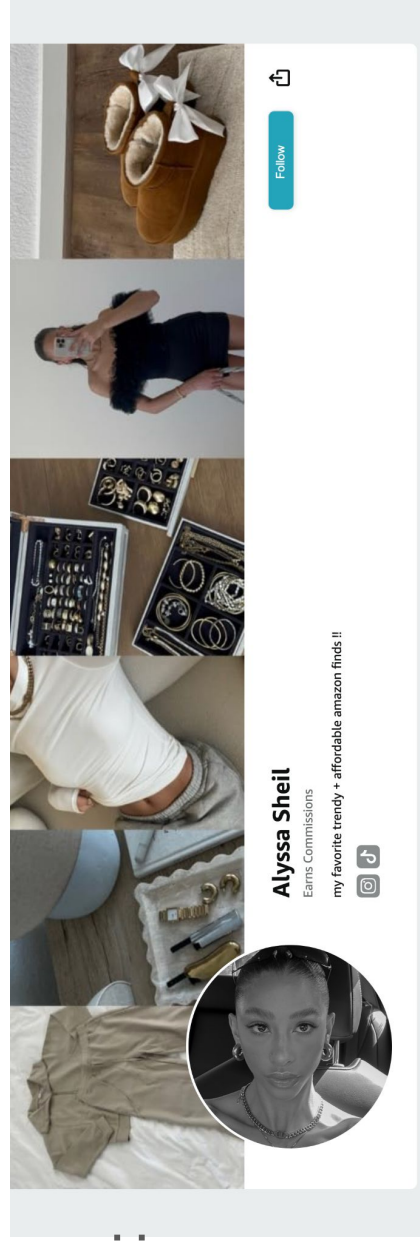


Amazon Storefront - Banner & Style

Plaintiffs:



Defendants:



Amazon Storefront - Banner & Style

Sydney changed her profile picture on 02/11/2024



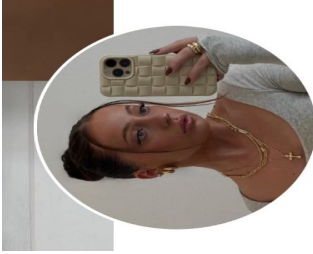
Sydney Nicole

Earns Commissions

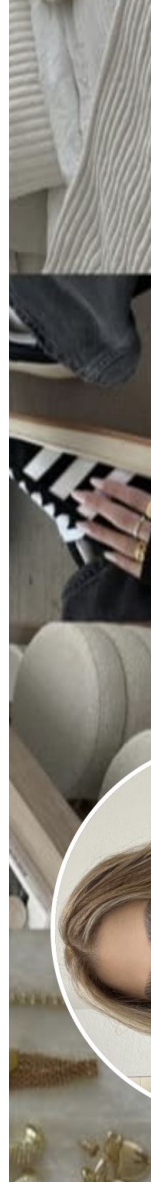
'photos' tab to shop my pics & for sizing info xo



Previous:



Alyssa changed profile picture on 02/13/2024



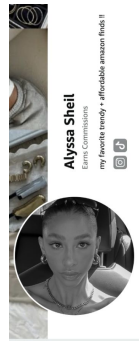
Alyssa Sheil

Earns Commissions

your amazon bff! all of the photos below are shoppable!



Previous:



Amazon Storefront - Idea Lists

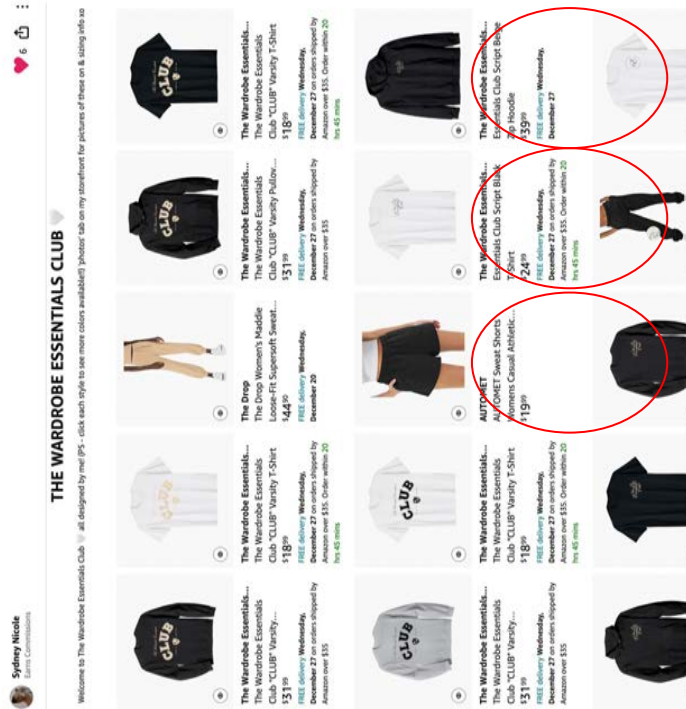


Plaintiffs' Amazon Storefront
Idea
List on November 28, 2023

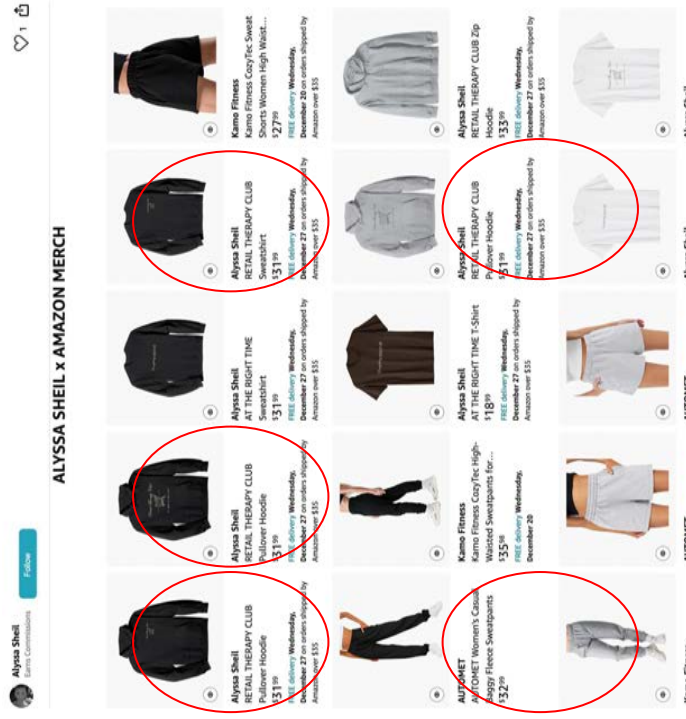
Defendants' Amazon Storefront
Idea List on November 28,
2023

Amazon Merch on Demand

Plaintiffs:



Defendants:



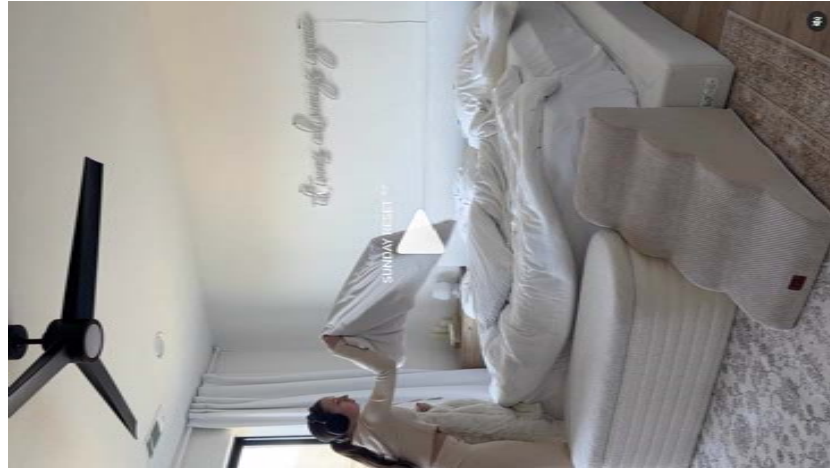
Posted 9/20/2023

Posted 10/26/2023

Defendants' Pattern of Copying

Plaintiffs:

@sydneynicolegiff



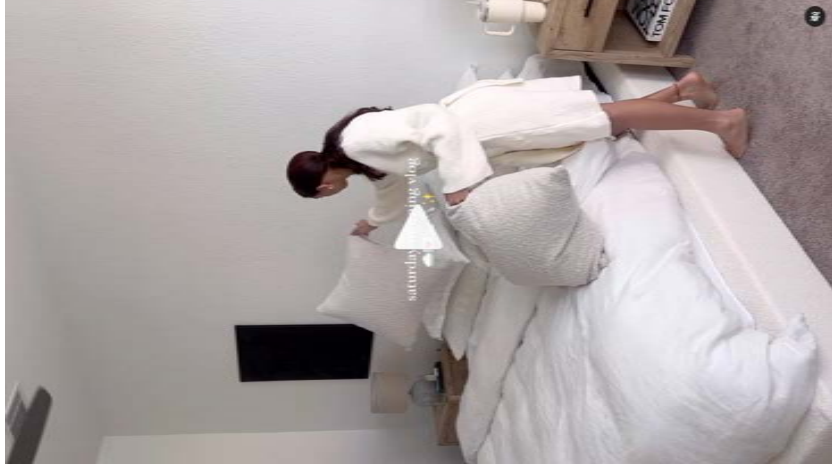
URL:

<https://www.instagram.com/reel/C0ZXb0xudCD/>

Posted 12/3/2023

Defendants:

@alyssasheill



URL:

https://www.instagram.com/reel/C0o6dXpAU_D/

Posted 12/9/2023

Defendants' Pattern of Copying

Plaintiffs:



URL:

<https://www.instagram.com/reel/C0KlqicOFRF/>

Posted 11/27/2023

Reg. No. VA 2380575

“CargoSweats.2023.11.23” ,

“BlackOutfit.2023.12.07” ,

“BlackJacket.2023.11.23” ,

“WhiteLongSleeve.2023.11.23”

Defendants:

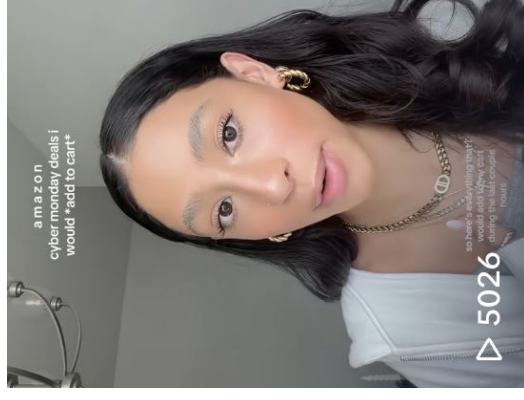


URLs:

<https://www.instagram.com/reel/C0LBldVtbUx/>

<https://www.tiktok.com/@ayvssashei/video/7306327426013859118>

Posted 11/27/2023

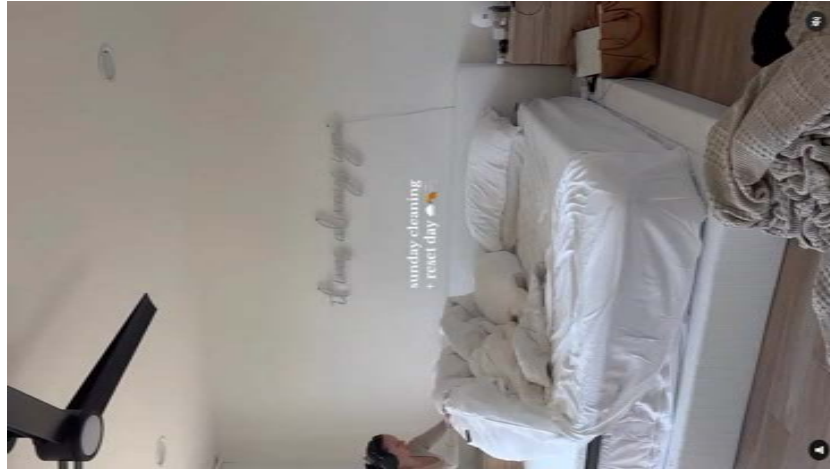


last minutes deal im lovin...

Defendants' Pattern of Copying

Plaintiffs:

@sydneynicolegiff



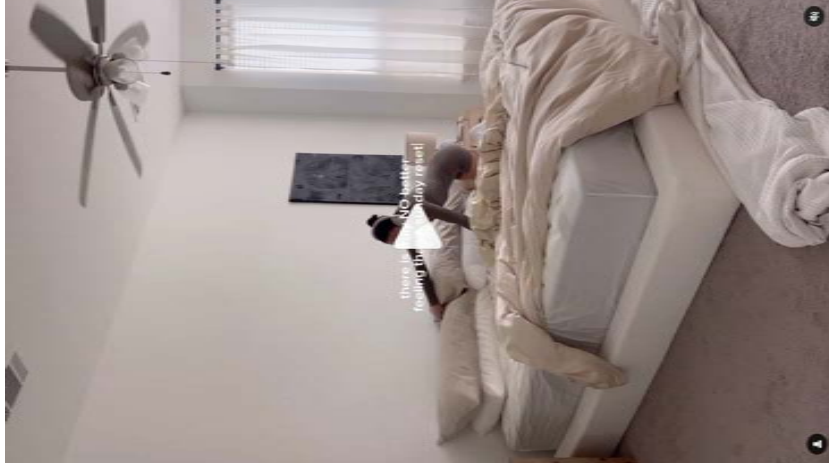
URL:

<https://www.instagram.com/reel/CxBMeAPukK1/>

Posted 9/10/2023

Defendants:

@alyssasheill



URLs:

<https://www.instagram.com/reel/Cz2IqHtdJ/>

<https://www.tiktok.com/@alyssasheill/video/7303359241178434859>

Posted 11/19/2023

Defendants' Pattern of Copying

Plaintiffs:

@sydneynicolegiff



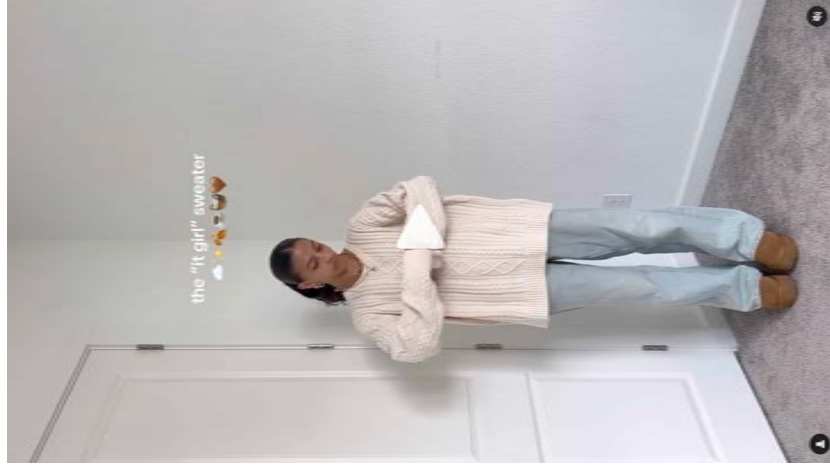
URL:

<https://www.instagram.com/reel/Cwlv5SpAQFu/>

Posted: 8/30/2023

Defendants:

@alysasheil



URLs:

<https://www.instagram.com/reel/Cw5U-rrcKJ/>

<https://www.tiktok.com/@alysasheil/video/7275360074351119659>

Posted 9/7/2023



> 236.7K

speechless !! sweater on ...

Defendants' Pattern of Copying

Plaintiffs:

@sydneynicolegiff



URL:

<https://www.instagram.com/reel/CuAu6F-gxBb/>

Posted: 6/27/2023

Defendants:

@alysasheill



URL:

<https://www.instagram.com/reel/Cuaz89wN9XW/>

Posted 7/7/2023

Defendants' Pattern of Copying

Plaintiffs:

@sydneynicolegiff



URL:

https://www.instagram.com/reel/CrtZq_TAK-7I/

Posted: 5/1/2023

Defendants:

@alysasheill



URL:

<https://www.instagram.com/reel/CuPdHxJAoEL/>

Posted 7/3/2023

Defendants' Pattern of Copying

Plaintiffs:



URL:
<https://www.tiktok.com/@sydneynicolegiff/video/7208612030301981994>
Posted 3/9/2023

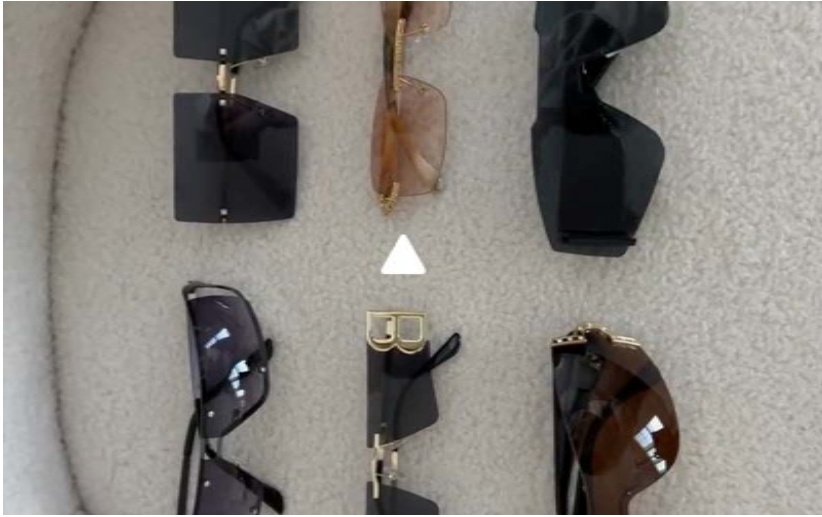
Defendants:



URL:
<https://www.tiktok.com/@alyssasheil/video/7210933849147165994>
Posted 3/15/2023

Defendants' Pattern of Copying

Plaintiffs:



Defendants:



URL:

<https://www.tiktok.com/@sydneynicolegiff/video/7185262079241129258>

Posted 1/5/2023

URL:

<https://www.tiktok.com/@alyssasheil/video/7200433934545538347>

Posted 2/15/2023