IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SEGA CORPORATION and SEGA OF AMERICA, INC., Plaintiffs, v. THE PARTNERSHIPS and UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE "A," Defendants.	Case No. 26-cv-12177

COMPLAINT

Plaintiffs Sega Corporation and Sega of America, Inc. (collectively, "Sega" or "Plaintiffs") hereby bring the present action against the Partnerships and Unincorporated Associations Identified on Schedule A attached hereto (collectively, "Defendants") and allege as follows:

I. JURISDICTION AND VENUE

1. This Court has original subject matter jurisdiction over Sega's claims pursuant to the provisions of the Lanham Act, 15 U.S.C. § 1051, *et seq.*, the Copyright Act 17 U.S.C. § 501, *et seq.*, 28 U.S.C. § 1338(a)-(b), and 28 U.S.C. § 1331.

2. Venue is proper in this Court pursuant to 28 U.S.C. § 1391, and this Court may exercise personal jurisdiction over Defendants because Defendants structure their business activities to target consumers in the United States, including Illinois, through at least the fully interactive e-commerce stores operating under the aliases identified on Schedule A attached hereto (the "Seller Aliases"). Specifically, Defendants have targeted sales to Illinois residents by setting up and operating e-commerce stores that target United States consumers; offer shipping to the United States, including Illinois; accept payment in U.S. dollars; and, on information and belief,

sell products using infringing and counterfeit versions of Sega's federally registered trademarks and/or unauthorized copies of Sega's federally registered copyrighted works, including the distinctive characters embodied therein (collectively, the "Unauthorized Products") to residents of Illinois. Each of the Defendants is committing tortious acts in Illinois, is engaging in interstate commerce, and has wrongfully caused Sega substantial injury in the state of Illinois.

II. INTRODUCTION

3. Sega filed this case to prevent e-commerce store operators who trade upon Sega's reputation and goodwill from further selling and/or offering for sale Unauthorized Products. Defendants create e-commerce stores under one or more Seller Aliases and then advertise, offer for sale, and/or sell Unauthorized Products to unknowing consumers. Defendants' activities, occurring at the same time and in the same retail space and manner as one another, blend together to create a single negative impression on consumers such that they constitute the same occurrence or series of occurrences. Defendants take advantage of a set of circumstances, including the anonymity and mass reach afforded by the Internet and the cover afforded by international borders, to violate Sega's intellectual property rights with impunity. Defendants attempt to avoid liability by operating under one or more Seller Aliases to conceal their identities, locations, and the full scope and interworking of their operation. Sega is forced to file this action to combat Defendants' counterfeiting of its registered trademarks and infringement of its registered copyrighted works, as well as to protect consumers from purchasing Unauthorized Products over the Internet. Sega has been, and continues to be, irreparably damaged through consumer confusion and dilution of its valuable trademarks and infringement of its copyrighted works because of Defendants' actions and therefore seeks injunctive and monetary relief.

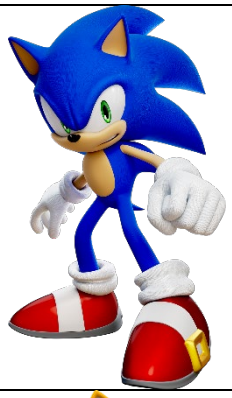
III. THE PARTIES

4. Plaintiff Sega Corporation is a Japanese corporation having its principal place of business at Sumitomo Fudosan Osaki Garden Tower, 1-1-1 Nishi-Shinagawa, Shinagawa-ku, Tokyo 141-0033, Japan. Plaintiff Sega of America, Inc. is a California corporation having its principal place of business at 6400 Oak Canyon, Suite 100, Irvine, California 92618. Plaintiffs are wholly owned subsidiaries of Sega Sammy Holdings, Inc., a publicly traded company on the Tokyo Stock Exchange. Sega Corporation and/or Sega of America, Inc. own the trademarks and copyrights asserted in this action. Plaintiff Sega Corporation, Plaintiff Sega of America, Inc. and Sega Sammy Holdings, Inc. are referred to herein together or individually as "Sega."

5. Sega is a multinational video game, entertainment, and animation company, as well as a former manufacturer of home computers and video game consoles. Sega has developed and manufactured numerous video game consoles, including the famous video game consoles Sega Genesis and Sega Dreamcast, and also provides software as a third-party developer. Known as one of the most iconic developers in the video game industry, Sega has successfully developed and launched multiple video game franchises including *Sonic the Hedgehog*.

6. Sonic the Hedgehog, pictured below, is Sega's most famous video game character. Since the 1991 release of the first *Sonic the Hedgehog* game, the *Sonic the Hedgehog* video game series has gained worldwide popularity, with Sega generating approximately 1.77 billion unit sales and downloads of the series as of March 31, 2024. The *Sonic the Hedgehog* video game series includes *Sonic the Hedgehog*, *Sonic the Hedgehog 2*, *Sonic Chaos*, *Sonic Mania*, and many others. In addition to the *Sonic the Hedgehog* video game series, Sega has developed a variety of Sonic the Hedgehog initiatives globally, including movies, animation, music, and merchandising. Some

of the characters and character names made famous by the Sonic the Hedgehog franchise include, but are not limited to: [1]

Sonic the Hedgehog	
Miles "Tails" Prower	
Knuckles the Echidna	

[1] The characters contained within the table are not an exhaustive list of the characters embodied in Sega's copyrighted works. This table is included only to provide examples of the characters found on the infringing products offered for sale or sold by Defendants. Regardless of any changes in their design, each of these characters, among others contained within Sega's copyrighted works, has always maintained its distinctive qualities and unique elements of expression.

Shadow the Hedgehog	
Dr. Robotnik/ Dr. Eggman	
Jet the Hawk	
Silver the Hedgehog	

Amy Rose	
Metal Sonic	
Chao	
Rouge the Bat	

Blaze the Cat	
Big the Cat	
Tangle the Lemur	
Cream the Rabbit	

Sonic the Werehog	

7. Since the release of the first *Sonic the Hedgehog* game in 1991, Sega has released over twenty *Sonic the Hedgehog* video games and has developed numerous spin-off TV shows, comic books, and movies.

8. In 2019, Sega released the Sega Genesis Mini – a slick, miniaturized version of its famous Genesis video game console that was first released in the 1980s. Due to the success of the Sega Genesis Mini, Sega released the Sega Genesis Mini 2 in October 2022.[2] The Sega Genesis Mini 2 is based on the Sega Genesis Model 2, a smaller version of the original Sega Genesis that was released in 1994. The Genesis Mini 2, designed to be ready to plug and play right out of the box, comes pre-loaded with 60 legendary Genesis games, including *Sonic the Hedgehog*, *Sonic the Hedgehog 2*, *Sonic CD*, and *Shining Force II*.

9. In 2020, Sega partnered with Paramount Pictures Corporation to produce the feature film *Sonic The Hedgehog*. The movie grossed nearly $320 million worldwide and became the domestic top-grossing video game adaptation film at the time. A second film, *Sonic the Hedgehog 2*, was released in 2022. A third film, *Sonic the Hedgehog 3*, was released in late 2024.

[2] *See* https://sega.jp/genesismini2/.



Figure 1

10. Before Defendants' acts described herein, Sega launched the *Sonic the Hedgehog* video game franchise and its related line of products bearing its famous SONIC THE HEDGEHOG mark. Sega has also registered a multitude of works related to the Sonic the Hedgehog franchise and the characters embodied therein with the United States Copyright Office, including at least: (1) episodes of animated television shows based on the *Sonic the Hedgehog* video game series, including *Adventures of Sonic the Hedgehog* and *Sonic Boom*; (2) *Sonic the Hedgehog* video games; (3) *Sonic the Hedgehog* comic books; and (4) the two *Sonic the Hedgehog* films produced in 2020 and 2022, respectively (the "Sega Copyrighted Works").

11. The Sega Copyrighted Works are registered with the United States Copyright Office. True and correct copies of the records from the U.S. Copyright Office website for the Sega Copyrighted Works are attached hereto as **Exhibit 1**. The Sega Copyrighted Works embody the distinctive characters found in paragraph 6 above.

12. Among the exclusive rights granted to Sega under the U.S. Copyright Act are the exclusive rights to reproduce, prepare derivative works of, distribute copies of, and display the Sega Copyrighted Works to the public. Since first publication, the Sega Copyrighted Works have been used on Sega's products and are featured on Sega's official websites.

13. Sega markets and sells a variety of products, including video games and video game consoles; accessories like key chains; backpacks; face masks; cell phone covers; apparel including t-shirts and sweatshirts; household items such as water bottles, mugs, blankets, and pillows; and other collectibles such as plush toys, comics, and toys (collectively, "Sega Products").

14. Sega Products have become enormously popular and even iconic, driven by Sega's quality standards and innovative designs. Among the purchasing public, Sega Products are instantly recognizable as such. The Sega and Sonic the Hedgehog brands have become global successes and Sega Products are among the most recognizable in the world. Sega Products are distributed and sold to consumers through retailers throughout the United States, including through authorized retailers in Illinois such as Amazon, Old Navy, Target, Walmart, Best Buy, GameStop, and Kohl's, and through the official shop.sega.com website.

15. Sega has used the SEGA and SONIC THE HEDGEHOG trademarks, and other trademarks, for many years and has continuously sold products under its trademarks (collectively, the "Sega Trademarks"). As a result of this long-standing use, strong common law trademark rights have amassed in the Sega Trademarks. Sega's use of the marks has also built substantial goodwill in the Sega Trademarks. The Sega Trademarks are famous marks and valuable assets of Sega. Sega Products typically include at least one of the Sega Trademarks and/or Sega Copyrighted Works.

16. The Sega Trademarks are registered with the United States Patent and Trademark Office, a non-exhaustive list of which is included below.

Registration Number	Trademark	Registration Date	Goods and Services
3,009,472	SONIC THE HEDGEHOG	Oct. 25, 2005	For: Video game software in class 009.
4,673,369	SONIC THE HEDGEHOG	Jan. 20, 2015	For: Key rings of precious metals; badges of precious metal; wristwatches; watches; clocks in

			class 014. For: Printed matter, namely, books, magazines and newsletters featuring animation, video games, computer games, arcade games, posters; comic books; note books in class 016. For: Bags, namely, backpacks, shoulder bags in class 018. For: Cups; bottles, sold empty in class 021. For: Quilts; quilt covers; pillowcases; bed blankets in class 024. For: Clothing, namely, t-Shirts, shirts, socks, underwear, sweaters, parkas, head wear, pajamas; shoes in class 025. For: Amusement game machines and coin-operated amusement machines for use in amusement parks; toys, namely, electronic action toys, inflatable toys, mechanical action toys puzzles, toy building blocks, board games; action figures; electronic action toys; dolls; stuffed toys; playing cards; sports equipment, namely, skateboards in class 028. For: Confectionery made of sugar; ice cream in class 030. For: Carbonated soft drinks; non-alcoholic beverages, namely, fruit-flavored soft drinks and soda water in class 032.
6,358,553	SONIC THE HEDGEHOG	May 25, 2021	For: Recorded videotapes and videodiscs featuring animation, action, adventure and comedy

			films; downloadable films and movies featuring animation, action, adventure and comedy provided via a video-on-demand service; motion picture films featuring animation, action, adventure and comedy; downloadable graphics for computers, video game machines and mobile phones featuring scenes and characters based on animated cartoons, computer games and video games; electronic publications, namely, downloadable electronic books and magazines in the field of motion pictures, cartoons, music, computer games and video games; phonograph records featuring music; downloadable music files via a global computer network and wireless devices; recorded compact discs featuring music, video game sounds and dialogues; compact discs, prerecorded audio tapes, and downloadable files featuring musical sound recordings; mobile phone straps; protective cases for cell phones; downloadable computer game programs; recorded computer game programs; downloadable computer game software; recorded computer game software; downloadable video game software; recorded video game software; downloadable video game programs; recorded video game programs; video game discs and cartridges; downloadable computer game software for use on mobile and cellular phones in class 009.
3,584,384	SONIC UNLEASHED	Mar. 3, 2009	For: Video game software in class 009.
5,024,565	SONIC RUNNERS	Aug. 23, 2016	For: Computer game programs; computer game software; computer game software for use on mobile and cellular phones in class 009.

			For: Providing information on on-line games in class 041.
5,268,608	SONIC MANIA	Aug. 22, 2017	For: Computer game programs; computer game software; video game software; video game programs; video game discs and video game cartridges; computer game software for use on mobile and cellular phones; protective cases for cell phones; downloadable graphics, images and moving images for computers, video game machines or mobile phones featuring scenes and characters based on computer and video games; downloadable computer and video game software; downloadable music files via a global computer network and wireless devices; musical sound recordings; prerecorded video discs and tapes featuring music, comedy, drama, action, adventure and animation in class 009. For: Entertainment services, namely, providing on-line video games and on-line computer games in class 041.
5,619,845	SONIC BOOM	Dec. 4, 2018	For: Computer game programs for home video consoles; disks, optical disks, ROM cartridges and other recording media, namely, computer cartridges all containing video game programs for use with home video game consoles; ROM cartridges and other recording media, namely, computer cartridges all containing video game programs for use with hand-held games with liquid crystal displays; video game software for home video game consoles; video game program; video game software; recorded compact discs featuring music,

			animated cartoons; video games and animated cartoons; recorded video discs featuring movies, cartoons, video games; videodiscs recorded with animation in class 009. For: toys, namely, plastic character toys, electronic character toys; action figures in class 028. For: movie showing, movie film production, or movie film distribution; providing on-line images, movies, moving images and graphics in the field of animated cartoons; providing on-line images, movies, moving images and graphics by computer terminals or mobile phones; providing on-line music, not downloadable, via computer terminals or mobile phones; production of television programs; television entertainment, namely, a continuing animated cartoons, broadcast over television; production of television programs in class 041.
2,892,207	SONIC TEAM	Oct. 12, 2004	For: Video game software; computer game programs; computer game discs video computer game programs; home video computer game discs game discs containing game programs for use with hand-held video game machines with built-in screens; musical sound recordings; in class 009.
4,366,529	SONIC & ALL-STARS RACING TRANSFORMED	Jul. 16, 2013	For: Computer game programs; computer game software; video game software; video game programs; video game discs and cartridges; computer game software for use on mobile and cellular phones; downloadable graphics and

			images featuring fictional characters or video games, and music via a global computer network; downloadable graphics and moving images for mobile phones featuring fictional characters or video games in class 009.
3,972,721		Jun. 7, 2011	For: Computer game programs; video game software; video game programs in class 009.
6,187,305	SONIC RACING	Nov. 3, 2020	For: Downloadable computer game programs; recorded computer game programs; downloadable computer game software; recorded computer game software; downloadable video game software; recorded video game software; downloadable video game programs; recorded video game programs; video game discs and cartridges; downloadable computer game software for use on mobile and cellular phones; mobile phone straps; protective cases for cell phones; downloadable graphics, images and moving images for computers, video game machines or mobile phones featuring scenes and characters based on computer and video games; downloadable computer game and video game software; downloadable music files via a global computer network and wireless devices; sound recorded compact discs featuring music, video game sounds and dialogues; compact discs, magnetic tapes, and downloadable files featuring musical sound recordings; prerecorded video discs and tapes featuring music, comedy, drama, action, adventure and animation; electronic publications, namely, downloadable books and magazines

			in the field of computer games, video games, cartoons and music; phonograph records featuring music in class 009. For: Entertainment services, namely, providing on-line video games and on-line computer games; providing entertainment information on on-line games; providing non-downloadable on-line computer graphics, moving images and images featuring scenes and characters based on computer and video games by computer networks, video game machines or mobile phones; providing amusement facilities; providing amusement arcade services; providing amusement parks; organization, production and presentation of video and computer game contests and tournaments; providing entertainment information about amusement facilities; providing on-line music, not downloadable in class 041.
6,263,485	TEAM SONIC RACING	Feb. 9, 2021	For: Downloadable computer game programs; recorded computer game programs; downloadable computer game software; recorded computer game software; downloadable video game software; recorded video game software; downloadable video game programs; recorded video game programs; video game discs and cartridges; downloadable computer game software for use on mobile and cellular phones; downloadable computer game and video game software in class 009. For: Pastes and other adhesives for stationery or household purposes; hygienic hand towels of paper; table napkins of paper; hand towels

			of paper; handkerchiefs of paper; stationery; stickers; printed matter, namely, comic books, instruction manuals in the field of computer games and video games, children's books, children's activity books, songbooks, children's magazines and magazines in the field of computer games, video games, cartoons and music; picture books, reference books in the field of computer games, video games, cartoons and music; catalogues in the field of computer games, video games, cartoons and music; calendars; general feature magazines in the field of computer games, video games, cartoons and music; books, namely, coloring books, date books; pamphlets in the field of computer games, video games, cartoons and music; trading cards other than for games; printed instructional and teaching material in the field of computer games, video games, cartoons and music; photographs; photograph stands in class 016. For: Clothing, namely, t-shirts, shirts, sweaters, sweatshirts, jackets, pajamas, coats, swimwear, mufflers as neck scarves, gloves, scarves, neck ties, socks, underwear, pants, jeans, shorts, skirts, underpants, robes; shoes; boots; footwear; beach shoes; galoshes; half-boots; lace boots; sandals; sneaker; sports shoes; wooden shoes; heels, namely, high-heel shoes; masquerade costumes; play costumes, namely, costumes for use in children's dress up play, costumes for use in role-playing games; clothes for sports, namely, sports jerseys and breeches for

			sports; boots for sports; headwear, namely, hats and caps in class 025. For: Coin-operated video games; arcade game machines; arcade video game machines; amusement game machines with built-in screens; toy vehicles; dolls; stuffed toys; toy action figures; trading card games; playing cards; arcade redemption game machines which dispense tickets or tokens to successful players; arcade crane game machines which dispense tickets or tokens to successful players; gaming machines, namely, slot machines in class 028. For: Tea; prepared coffee and coffee-based beverages; prepared cocoa and cocoa-based beverages; almond confectionery, namely, almond cookies, chocolate confectionery, namely, chocolate mousses, chocolate cakes and chocolate chips, confectionery fondants, namely, rolled fondant, confectionery fruits jellies, namely, fruit jelly candy, confectionery fruits pastes, namely, fruit paste for flavoring of food, peanut confectionery, namely, peanut brittle and peanut butter confectionery chips, fruits-based confectionery, namely, fruit coulis, fruit turnovers and fruit cobblers; bread and buns; sandwiches; hamburgers sandwiches; pizzas; hot dog sandwiches; meat pies; ice cream; preparations made from cereals, namely, cereal-based snack bars; sushi; ravioli; instant confectionery mixes, namely, cappuccino mixes, hot chocolate mixes and biscuit mixes; crepes; pasta sauce; biscuits; cookies in

			class 030. For: Beer; fruit-flavored carbonated drinks; fruit juices; vegetable juices; extracts of hops for making beer; whey beverages in class 032. For: Entertainment services, namely, providing on-line video games and on-line computer games; organization, production and presentation of video and computer game contests and tournaments in class 041.
7,002,602	SONIC PRIME	Mar. 21, 2023	For: Downloadable computer game programs; recorded computer game programs; downloadable computer game software; recorded computer game software; downloadable video game software; recorded video game software; downloadable video game programs; recorded video game programs; video game discs and cartridges; downloadable computer game software for use on mobile and cellular phones; mobile phone straps; protective cases for cell phones; downloadable graphics, images, and video recordings for computers, video game machines and mobile phones featuring scenes and characters based on computer and video games; downloadable computer game and video game software; downloadable music files via a global computer network and wireless devices; sound recordings recorded on compact discs featuring music, video game sounds and dialogues; prerecorded compact discs, magnetic audio tapes, and downloadable files featuring music; prerecorded video discs and magnetic audio tapes featuring music, comedy, drama, action,

			adventure and animation; electronic publications, namely, downloadable books and magazines in the field of computer games, video games, cartoons and music; phonograph records featuring music; animated cartoons, namely, videotapes and videodiscs recorded with animation; downloadable electronic publications in the nature of books, manuals, catalogs, pamphlets, and magazines in the field of computer games, video games, cartoons and music; pedometers; scales; bathroom scales in class 009. For: Pastes and other adhesives for stationery or household purposes; hygienic hand towels of paper; towels of paper; table napkins of paper; hand towels of paper; handkerchiefs of paper; stationery; seals being stationery; stickers being stationery; blank notepads; decorative stickers for portable game machines; printed instruction manuals in the field of computer games, video games, cartoons and music; printed picture books; printed reference books in the field of computer games, video games, cartoons and music; printed catalogues in the field of computer games, video games, cartoons and music; printed calendars; printed magazine publications in the field of computer games, video games, cartoons and music; printed books in the field of computer games, video games, cartoons and music; printed pamphlets in the field of computer games, video games, cartoons and music; printed trading cards, other than for games; printed game hint books and manuals; printed photographs; photograph

			stands in class 016. For: Clothing for domestic pets; bags, namely, carry-on bags; shoulder bags; school bags; traveling bags; pouches of leather; boston bags; rucksacks; key cases; wallets; credit card cases; vanity cases, not fitted; umbrellas and their parts; walking sticks; canes; metal parts of canes and walking-sticks; handles for canes and walking-sticks; saddlery in class 018. For: Clothing, namely, t-shirts, shirts, sweaters, sweatshirts, jackets, pajamas, coats, swimwear, mufflers, gloves, scarves, neck ties, socks, underwear, pants, jeans, shorts, skirts, underpants, robes; footwear; beach shoes; boots; galoshes; half-boots; lace boots; sandals; sneakers; shoes; sports shoes; wooden shoes; high-heeled shoes; masquerade costumes; play costumes, namely, costumes for use in children's dress up play, costumes for use in role-playing games; clothes for sports namely, sports jerseys and breeches for sports; boots for sports; headwear, namely hats and caps in class 025. For: Toy vehicles; dolls; plush dolls; stuffed toys; toy action figures; toy for pets; toy jewelry; bath toys; electronic action toys; plastic character toys; children's educational toys for developing cognitive skills; construction toys; puzzles; children's multiple activity toys; toy building sets comprised of toy building blocks; novelty toy face masks; trading card games; playing cards; coin-operated video games; arcade game machines;

			arcade video game machines; amusement game machines with built-in screens; arcade redemption game machines which dispense tickets or tokens to successful players; arcade crane game machines which dispense tickets or tokens to successful players in class 028. For: Tea; prepared coffee and coffee-based beverages; prepared cocoa and cocoa-based beverages; almond confectionery, namely, cookies; chocolate confectionery; confectionery fondants; confectionery fruit jellies, namely, fruit jelly candy; confectionery fruit pastes for flavouring of food; peanut confectionery, namely, peanut brittle and peanut butter confectionery chips; fruit-based confectionery, namely, hollow candy forms filled with fruit; bread and buns; steamed buns stuffed with minced meat; meat pies; ice cream; cereal preparations¸, namely, cereal-based snack bars; Chinese stuffed dumplings; Chinese steamed dumplings; sushi; pre-packaged boxed lunches consisting of rice, with added meat, fish or vegetables; ravioli; instant confectionery mixes¸, namely, cappuccino mixes, hot chocolate mixes, cocoa mixes, cake mixes, cookie mixes, pastry mixes, crepe mixes, mixes for bakery goods, biscuit mixes, instant pudding mixes, mixes for candy making, frosting mixes, frozen yogurt mixes, pre-processed mixes for making non-dairy frozen confections; crepes; pasta sauce; biscuits; cookies in class 030.

			For: Entertainment services, namely, providing on-line video games and on-line computer games; providing information on on-line games; providing non-downloadable on-line computer graphics, videos and images featuring scenes and characters based on computer and video games by computer networks, video game machines or mobile phones; providing amusement facilities; organization, production and presentation of video and computer game events; arranging and conducting of video game and computer game events for entertainment purposes; organization or arrangement of game tournaments; providing information about amusement facilities; providing on-line music, not downloadable; providing electronic publications in the nature of books, manuals, catalogs, pamphlets, and magazines in the field of computer games, video games, cartoons and music; services of reference libraries for literature and documentary records; book rental; planning, management or arrangement of showing movies, theatrical shows, plays or musical performances; providing information relating to planning, management or arrangement of showing movies, theatrical shows, plays or musical performances; movie showing, movie film production, or movie film distribution; providing information relating to providing on-line graphics, movies showing, moving images, images, music and publishing of electronic publications; providing on-line

			graphics, movies showing, moving images, images, music and text information by computer terminals or mobile phones; providing information relating to providing on-line graphics, movies showing, moving images, images, music and publishing of electronic publications by computer terminals or mobile phones; providing on-line graphic novels, not downloadable, relating to characters of books, animated cartoons, toys, games; images showing; presentation of live show performances; direction or presentation of theatrical plays; presentation of musical performances; on-line presentation of shows, theatrical plays or musical performances; providing information relating to on-line presentation of shows, theatrical plays or musical performances; provision of shows, theatrical plays or musical performances by computer terminals or mobile phones; providing information relating to provision of shows, theatrical plays or musical performances by computer terminals or mobile phones; production of theatrical shows; production of live theatrical and musical shows; presentation of musical performances, direction or presentation of theatrical plays and presentation of musical performances provided on-line from a computer network; production of moving images and music using the internet via streaming; production of moving images and music relating to animated cartoons using the internet via streaming; on-line production of radio or television programs;

			production of radio or television programs and production of broadcast programs, using computer graphics; directing of radio and television programs; providing information relating to direction of radio and television programs; organization of sporting events; providing sports information; organization and provision of games and competitions via the internet; organization, arranging and conducting of computer game and video game tournaments; organization, arranging and conducting of photo sessions; providing information relating to sports and sporting events; organizing and conducting of sporting and cultural events; rental of game machines and apparatus; providing exercise facilities; rental of sports equipment; photography in class 041.
1,566,116	SEGA	Nov. 14, 1989	For: Video game attachments for television sets, namely, video game control sticks, video game programs recorded on integrated circuits in the form of cartridges and cards in class 028.
5,808,893	SEGA	Jul. 23, 2019	For: Apparatus and instruments for conducting, switching, transforming, accumulating, regulating or controlling electricity; apparatus for recording, transmission or reproduction of sound or images; prerecorded magnetic data carriers, recording discs, compact discs, DVDs and computer media featuring scenes and characters from computer and video games; mechanisms for coin-operated apparatus; cash registers, calculating machines, data processing equipment, computers;

			computer software for playing video games; computer software for database management; computer software for controlling and managing business data; fire-extinguishing apparatus; computer software development tools; downloadable computer file sharing software to enable uploading, downloading, accessing, posting, displaying, tagging, blogging, streaming, linking, sharing or otherwise providing electronic media or information via computer and communication networks; computer programs, namely, downloadable software for playing video games; programs for cell phones, namely, downloadable software for playing video games; game programs for smartphones, namely, downloadable computer game software; programs for smartphones, namely, downloadable software for playing video games; downloadable computer game programs for handheld terminals; coils, electric; particle accelerators; reflecting discs for wear, for the prevention of traffic accidents; clothing for protection against accidents, irradiation and fire; accumulator jars; battery boxes; acidimeters for batteries; hydrometers; plates for batteries; whistle alarms; acoustic sound alarms; acoustic conduits; speaking tubes; actinometers; adding machines; aerometers; enlarging apparatus for photography; electro-dynamic apparatus for the remote control of railway points; magnets; electromagnetic coils; air analysis apparatus; alcoholmeters; alidades; igniting apparatus, electric, for

			igniting at a distance, namely, remote control starters for vehicles; batteries for lighting; altimeters; asbestos gloves for protection against accidents; asbestos clothing for protection against fire; ammeters; amplifiers; amplifying tubes for amplifiers; anemometers; fire extinguishers; anodes; anode batteries; electrical transformers; optical apertometers; money counting and sorting machines; surveying instruments; surveying chains; lenses for astrophotography; mechanisms for coin-operated apparatus; comparators; fire alarms; automatic indicators of low pressure in vehicle tires; protective suits for aviators; alarm bells, electric for use with burglar alarms; rods for water diviners; life-saving rafts; scales; meteorological balloons; demagnetizing apparatus for magnetic tapes; tape recorders; blank magnetic computer tapes; barometers; weighing machines; weighbridges; fire beaters; chargers for electric batteries; betatrons; ticket dispensers, namely, video lottery ticket terminals, electronic parking lot ticket dispensers; cabinets for loudspeakers; close-up lenses; electricity terminals; pressure indicator plugs for valves; galvanometers; electrical push buttons for door bells; electrical branch distribution boxes; tone arms for record players; spirit levels; punched card machines for offices; sheaths for electric cables; frames for photographic transparencies; circular slide rules; slide-rules; slide calipers; blueprinting machines; cinematographic cameras; capillary tubes for laboratory research use;

			protective helmets; respiratory masks, other than for artificial respiration or medical purposes; solderers' helmets; eyeglass chains; photography darkroom equipment, namely, lamps; boiler control instruments; drying racks for photography; editing appliances for cinematographic films; printed circuits; blinkers being traffic light signaling lights; signal bells; containers for microscope slides; electric installations for the remote control of industrial operations; switchboxes for electricity; commutators; marine compasses; eyepieces, namely, spectacles; thread counters; pedometers; metronomes; condensers; conductors, electric; electricity conduits; circuit closers; electrical connectors; junction boxes; contacts, electric; regulating apparatus, electric; speed checking apparatus for vehicles, namely, laser speed detectors; converters, electric; photographic, electrostatic, and thermic photocopiers; eyeglass cords; correcting lenses; objectives lenses; diving suits; electric apparatus for commutation, namely, commutators; switches, electric; electricity limiters; electrical connections, namely, sockets, plugs and other contacts; current rectifiers; cell switches for electricity; dressmakers' tape measures; crucibles for laboratory use; appliances for measuring the thickness of leather; cyclotrons; counterfeit false coin detectors; shutter release; densimeters; video disks and tapes with recorded animated cartoons; laboratory trays; metal detectors for industrial or military purposes; sonars; shutters

			for cameras; acoustics diaphragms for use in sound recording; centering apparatus for photographic transparencies; cameras; photographic transparencies; slide projectors; dictating machines; diffraction apparatus for use in microscopy; loudspeakers; circuit breakers; record players; microscopes; distance recording apparatus; range finders; distribution boards for use with electricity; distribution consoles for use with electricity; compasses being measuring instruments; tape measures; dynamometers; water level indicators; fire escapes, namely, ladders; flash-bulbs for photography; telephone receivers; fluorescent screens; projection screens; workmen's protective face-shields; screens for photography; drainers for use in photography; electric loss indicators; cables, electric; electricity ducts; control panels for use in electricity; connections for electric lines; couplings, electric; relays, electric; electrolysers; transmitters of electronic signals; transmitting sets comprising transmitters for use in telecommunication; blank sound recording magnetic strips; spools for cameras; mechanical signs; epidiascopes; test tubes for laboratory use; balancing apparatus namely, balances; thermostats; egg-candlers; fuel gauges; gasoline gauges; spark-guards for protection against injury; cases especially made for photographic apparatus and instruments, namely, video cameras; refractometers; exposure meters being light meters; invoicing machines, namely, printers;

			apparatus for fermentation being laboratory apparatus; wires, electric; magnetic wires; plumb bobs; plumb lines; nets for protection against accidents; safety nets; safety tarpaulins; film cutting apparatus; filters for respiratory masks for laboratory use; camera filters for use in photography; battery chargers; frequency meters; fuses; radios; galena crystals detectors for use in electronics; galvanic batteries; gloves for protection against accidents; gloves for divers; gloves for protection against X-rays for industrial purposes; gas testing instruments; gasometers being measuring instruments; surveying apparatus and instruments; leveling staffs being surveying instruments; drying apparatus for photographic prints; glazing apparatus for photographic prints; rulers being measuring instruments; measuring glassware; screens for photoengraving; grids for batteries; clothing for protection against fire; audio- and video-receivers; heliographic apparatus; hygrometers; identification threads for electric wires; identification sheaths for electric wires; life saving apparatus and equipment, namely, flotation vests; fire hose nozzles; fire engines; fire trucks; slope indicators; taximeters; quantity indicators; vacuum gauges; speed indicators; electricity inductors; armatures for use in electricity apparatus; data processing apparatus; mirrors for inspecting work; carriers for dark plates in photography; electricity inverters; ionizers for scientific or laboratory use; peepholes, namely, magnifying lenses for doors;

			furniture especially made for laboratories; lactodensimeters; lactometers; darkroom lamps for photography; magic lanterns; signal lanterns for safety purposes; lasers, not for medical purposes; optical lenses; letter scales; magnifying glasses; signs, luminous; neon signs; spectacles; surveyors' levels; spectacle lenses; pressure gauges; periscopes; coin-operated mechanisms for television sets; megaphones; computer memory devices; carpenters' rules; mercury levels; speed measuring apparatus for use in photography; microphones; microtomes; time switches, automatic; optical mirrors; breathing apparatus for underwater swimming; electric navigational instruments; spectacle frames; batteries, electric; accumulators, electric; optical prisms for scientific purposes; octants; ohmmeters; wavemeters; optical glass for use with spectacles; computers; oscillographs; oxygen transvasing apparatus; ozonisers; micrometers; signaling panels, luminous or mechanical for traffic purposes; lightning conductors being rods; parking meters; apparatus for measuring the thickness of skins for laboratory use; acid hydrometers; weighing apparatus and instruments; salinometers; washing trays for use in photography; stands for photographic apparatus; viewfinders, photographic; photometers; phototelegraphy apparatus; pince-nez; pipettes; plane tables being surveying instruments; planimeters; ear plugs for divers; bells for use as warning devices; test weights; polarimeters;

			radiotelephony sets; radiotelegraphy sets; pressure measuring apparatus; pressure indicators; mouth guards for athletic use; pyrometers; radar apparatus; vehicle radios; protractors being measuring instruments; apparatus and installations for the production of X-rays, not for medical purposes; X-ray tubes not for medical purposes; protection devices against X-rays, not for medical purposes; telephone apparatus; refractors for laboratory use; X-ray apparatus not for medical purposes; spectroscopes; resistances, electric; thermometers, not for medical purposes; respirators for filtering air other than for artificial respiration; breathing apparatus, except for artificial respiration for underwater use; rheostats; balances for use in steelyards; emergency signals, luminous or mechanical; saccharometers; electrical probes for scientific purposes; satellites for scientific purposes; choking coils for electrical impedance; electricity wire connectors; locks, electric; sextants; signaling whistles; vehicle breakdown warning triangles; electro-dynamic apparatus for the remote control of signals; simulators for the steering and control of vehicles; sirens; sound transmitting apparatus; sound recording apparatus; sound reproduction apparatus; spherometers; stereoscopes; needles for record players; sulfitometers; teleprinters; tachometers; screw-tapping gauges; telegraph transmitting apparatus; television apparatus for projection purposes; telegraph wires; masts for wireless

			aerials; teleprompters; telephone transmitters; teleruptors; binoculars; telescopes; temperature indicators; time recording apparatus; theodolites; thermostats for vehicles; revolution counters; speed regulators for record players; television transmitters; radio transmitters; precision balances; marking gauges for joinery; vacuum tubes for radios; urinometers; variometers; verniers; blank videotapes; viscosimeters; voltage regulators for vehicles; voting machines; voltmeters; apparatus for changing record player needles; stills for laboratory experiments; fuse wire; anticathodes; dog whistles; electrical anti-theft warning apparatus for personal use; beacons, luminous; holders for electric coils; photographic films, exposed; road signs, luminous or mechanical; life buoys; signaling buoys; electric buzzers; directional compasses; fog signals, non-explosive; cash registers; radiology screens for industrial purposes; identity cards, magnetic; photovoltaic cells; densitometers not for medical use; blank disks, magnetic; blank floppy disks; head cleaning tapes for use in recording sound and video; video recorders; computer keyboards; integrated circuits; semi-conductors; integrated circuit chips; cathodes; life jackets; life belts; cinematographic film, exposed; materials for electricity mains, namely, wires, cables; contact lenses; containers for contact lenses; incubators for bacteria culture; solar batteries; copper wire, insulated; discharge tubes, electric, other than for lighting; diaphragms

			for use in photography; distillation apparatus for scientific purposes; dosage dispensers, namely, machines for dispensing pre-determined dosages of medication; electric door bells; spectacle cases; furnaces for laboratory use; optical fibers, namely, fibers being light conducting filaments; telephone wires; x-ray films, exposed; filters for ultraviolet rays, for photography; horns for loudspeakers; tripods for cameras; bar code readers; bullet-proof waistcoats and vests; marking buoys; wafers for integrated circuits; chromatography apparatus for laboratory use; chronographs being time recording apparatus; blank compact discs for audio-video; blank compact discs for read-only memory; computer peripheral devices; optical condensers; acoustic couplers; couplers being data processing equipment; decompression chambers; plotters; divers' masks; electronic pens with visual display units; encoded magnetic cards, namely, charge cards, debit cards, identify cards; facsimile machines; fire boats; interfaces for computers; juke boxes for computers; knee-pads for workers; light dimmers being electric regulators; magnetic encoders; magnetic tape units for computers; microprocessors; modems; monitors being computer hardware; computer monitors; mouse being a computer peripheral; optical character readers; printers for use with computers; processors being central processing units; readers being data processing equipment; scanners being data processing equipment; smoke

			detectors; electronic transistors; x-ray photographs, other than for medical purposes; junction sleeves for electric cables; abacuses; electronic agendas; answering machines; camcorders; cassette players; compact disc players; disk drives for computers; electrified rails for mounting spot lights for emergency use; electronic pocket translators; electronic tags for goods; fire blankets; flashlights for use in photography; integrated circuit cards, namely, blank smart cards; measuring spoons; notebook computers; electronic notice boards; pocket calculators; shoes for protection against accidents, irradiation and fire; sprinkler systems for fire protection; battery starter cables for motors; sunglasses; time clocks being time recording devices; blank video cassettes; video game cartridges; video screens; video telephones; goggles for sports; nose clips for divers and swimmers; protective helmets for sports; downloadable electronic publications, namely, books featuring scenes and characters from computer and video games; navigation apparatus for vehicles being on-board computers; decorative magnets; cordless telephones; mouse pads; personal stereos; wrist rests for use with computers; coaxial cables; fiber optic cables; covers for electric outlets; marine depth finders; electrified fences; computer game software; headphones; lighting ballasts; radio pagers; satellite navigational apparatus, namely, GPS; solenoid valves being electromagnetic switches; voltage surge protectors; walkie-talkies;

			wind socks for indicating wind direction; light-emitting electronic pointers; resuscitation mannequins being teaching apparatus; stage lighting electrical regulators; egg timers, namely, sandglasses; DNA chips; DVD players; automated teller machines (ATM); traffic-light apparatus being signaling devices; hands free kits for phones; asbestos screens for firemen; riding helmets; clothing especially made for laboratories; encoded identification bracelets, magnetic; transponders; downloadable ring tones for mobile phones; downloadable music files; downloadable image files; crash test dummies; laboratory centrifuges; printed circuit boards; blank USB flash drives; global positioning system (GPS) apparatus; portable media players; cell phone straps; light emitting diodes (LEDs); triodes; step-up transformers; laptop computers; fire hose; bags adapted for laptops; sleeves for laptops; digital photo frames; petri dishes; pitot tubes; stroboscopes; safety traffic cones; temperature indicator labels, not for medical purposes; electronic book readers; smartphones; toner cartridges, unfilled, for printers and photocopiers; baby monitors; video baby monitors; lens hoods; tablet computers; encoded key cards; 3D spectacles; memory cards for video game machines; bullet-proof clothing; accelerometers; electrical adapters; life-saving capsules for natural disasters; computer hardware; solar panels for the production of electricity; telescopic sights for artillery; digital signs; electronic sports training simulators; computer game

			cartridges; computer game programs; computer game software downloadable from a global computer network; computer programs for video and computer games; interactive multimedia computer game programs; computer game discs; downloadable computer game programs; electronic game programs; electronic game software; interactive video game programs; recorded computer game programs; video game discs; video game programs; video games software; virtual reality game software; audio tapes featuring music; cases for telephones; cellular phones; compact discs featuring music; prerecorded audio tapes featuring music; prerecorded video cassettes featuring music in class 009. For: Printed matter namely, comic books, video game instruction manuals, children's books, children's activity books, songbooks, children's magazines, magazines and pamphlets featuring information and articles about fashion and games; bookbinding material; photographs; stationery; adhesives for stationery or household purposes; paint brushes; printers' type; printing blocks; steel letters for use in printing; steel pens; adhesive tape dispensers being office requisites; address stamps; addressing machines; paper; posters; printed advertisement boards of paper or cardboard; franking machines for office use; clips for letters; paper clips; binder clips; clips for name badge holders; pen clips; stapling

			presses; photo albums; pictures; print engravings; cigar bands; pencil sharpening machines, electric or non-electric; bookends; hand-rests for painters; aquarelles; architects' models; document files being stationery; writing slates; slate pencils; silver paper; modelling clay; printed arithmetical tables; print engravings; lithographic works of art; paintings and pictures, framed or unframed; pencils; newspapers; atlases; loose-leaf binders; gummed tape; place mats of paper for beer glasses; printed tickets; printing blocks; drawing pads; pads for writing being stationery; spools for inking ribbons; wristbands for the retention of writing instruments; pamphlets in the field of computer games, video games, animated films and animated cartoons; embroidery designs being printed patterns; drawing pins; moisteners being office requisites; painters' brushes; blotters; stamps seals; sealing stamps; inking pads; sealing wax; envelope sealing machines for offices; sealing compounds for stationery purposes; writing or drawing books; trays for sorting and counting money; tracing patterns; tracing paper; tracing cloth; finger-stalls being office requisites; printing type; carbon paper; paper for recording machines; note books; square rulers for drawing; greeting cards; index cards; paper sheets for note taking; cardboard; hat boxes of cardboard; perforated cards for jacquard looms; cardboard tubes; catalogs in the field of computer games, video games, animated films and animated cartoons; tags for index

			cards; song books; composing frames for printing; folders for papers; painters' easels; numbers for printing type; Indian inks; chromolithographs; modelling wax, not for dental purposes; paper files; office perforators; toilet paper; books in the field of computer games, video games, animated films and animated cartoons; compasses for drawing; printers' type numerals and letters; letter trays; conical paper bags; correcting fluids for type; correcting ink for use in heliography; pencil leads; histological sections for teaching purposes; French curves; book covers; writing chalk; chalk for lithography; tailors' chalk; writing chalk and marking chalk holders; pencil holders; pencil lead holders; cream containers of paper, namely, paper boxes for use as food packaging; paper clasps; rollers for typewriters; transfers being decalcomanias; graphic prints; graining combs; drawing boards; drawing instruments; diagrams for building computer circuits; envelopes for use as stationery; duplicators, namely, duplicating paper, machines, ink; etchings; packing paper; pen nibs; typewriters, electric or non-electric; pen cases; nibs of gold for pens; erasing products, namely, erasers; drawing shields; erasing shields; rubber erasers; electrocardiograph paper; hand-operated and electric hole punches being office requisites; writing and drawing ink; inking ribbons; inkwells; envelope sealing machines for offices; printed, photographs; pen wipers; sealing stamps; fabrics for bookbinding; ledger books;

			telephone indexes; figurines being statuettes of papier mâché; filter paper; filtering materials in the nature of paper; forms, printed; charcoal pencils; stencils; galley racks for printing; electrotypes; geographical maps; terrestrial globes; artists' watercolor saucers; graphic art reproductions; graphic representations; scrapers being erasers for offices; engraving plates; hectographs; printed timetables; moisteners for gummed surfaces being office requisites; postcards; hand labeling appliances, namely, label printing machines; printers' blankets, not of textile; manuals being handbooks in the field of computer games, video games, animated films and animated cartoons; writing paper; paperweights; tracing needles for drawing purposes; drawing pens; table linen of paper; lithographs; lithographic stones; booklets in the field of computer games, video games, animated films and animated cartoons; luminous paper; papier mâché; manifold paper; marking chalk; plastics for modeling, namely, polymer modelling clay; modelling compounds; modelling paste; handkerchiefs of paper; inking sheets for duplicators; tablecloths of paper; blackboards; paper-clips; oleographs; binding strips for use in bookbinding; sealing wafers for stationery purposes; palettes for painters; pantographs being drawing instruments; stationery; parchment paper; pastels being crayons; printed sewing patterns; stencil cases; house painters' rollers; canvas for painting; paint boxes being articles for use in school;

			plastic film for wrapping; apparatus for mounting photographs, namely, photograph mounts; photograph stands; photo-engravings; blueprints; stationery folders; fountain pens; stencil plates; stencils; portraits; flower-pot covers of paper; mimeograph apparatus and machines; paper tapes and cards for the recordal of computer programs; printed prospectuses in the field of computer games, video games, animated films and animated cartoons; paper for radiograms; drawing rulers; printers' reglets; bookbinding material; bookbindings; cloth for bookbinding; cords for bookbinding; inking sheets for document reproducing machines; pens being office requisites; magazines in the field of computer games, video games, animated films and animated cartoons; paper ribbons; typewriter ribbons; bags of paper or plastics, for merchandise packaging; stamp pads; school supplies, namely, stationery; bookmarkers; greeting cards; steatite tailor's chalk; balls for ball-point pens; tablemats of paper; desk mats; typewriter keys; holders for stamping seals; cases for stamping seals; postage stamps; stamp stands; paper transparencies; gluten glue for stationery or household purposes; adhesives glues for stationery or household purposes; adhesive tapes for stationery or household purposes; adhesive bands for stationery or household purposes; address plates for addressing machines; almanacs; calendars; starch paste adhesive for stationery or household purposes; paintbrushes; self-adhesive tapes

			for stationery or household purposes; elastic bands for offices; bibs of paper; wood pulp paper board for stationery purposes; wood pulp paper; boxes of cardboard or paper; stands for pens and pencils; bottle envelopes of cardboard or paper; coasters of paper; announcement cards; plastic bubble packs for wrapping or packaging; flags of paper; paper shredders for office use; sheets of reclaimed cellulose for wrapping; desktop cabinets for stationery; glue for stationery or household purposes; paper knives being letter openers; garbage bags of paper or of plastics; pencil sharpeners, electric or non-electric; tissues of paper for removing make-up; table napkins of paper; place mats of paper; drawing squares; drawing t-squares; penholders; inkstands; writing cases, namely, sets of pencils; bottle wrappers of cardboard or paper; placards of paper or cardboard; towels of paper; face towels of paper; labels of paper, cardboard; etching needles; viscose sheets for wrapping; gums being adhesives for stationery or household purposes; gummed cloth for stationery purposes, namely, bookbinding; isinglass for making glue for stationery or household purposes; bags for microwave cooking; paper coffee filters; plastic cling film, extensible, for palletization; inking ribbons for computer printers; signboards of paper or cardboard; stickers; bookbinding apparatus in the nature of machines being office equipment; comic books; copying paper; holders for checkbooks; ink sticks; ink stones; musical greeting

			cards; newsletters in the field of computer games, video games, animated films and animated cartoons; packaging material made of paper based starches; waxed paper; passport holders; writing brushes; writing instruments; drawer liners of paper, perfumed or not; credit card imprinters, non-electric; document laminators for office use; Xuan paper for Chinese painting and calligraphy; writing board erasers; clipboards; chart pointers, non-electronic; paper bows for gift wrapping; moulds for modeling clays being artists' materials; money clips; trading cards other than for games; absorbent sheets of paper or plastic for foodstuff packaging; humidity control sheets of paper or plastic for foodstuff packaging; correcting tapes being office requisites; paint trays; marking pens; informational flyers in the field of computer games, video games, animated films and animated cartoons; document holders; page holders; polymer modelling clay; packing, cushioning, and stuffing materials of paper or cardboard; stuffing of paper or cardboard; paper tags; printed lottery tickets other than toys; computer game instruction manuals; computer user manuals in class 016. For: Clothing, namely, tops, bottoms, shirts; footwear other than special footwear for sports; headwear; non-slipping devices for footwear, namely, soles; motorists' clothing, namely, tops, bottoms, shirts; bath sandals; bath slippers; stockings; sweat-absorbent stockings; heelpieces for stockings;

			berets; overalls; boas being necklets; caps being headwear; hosiery; half-boots; tips for footwear; dress shields; lace boots; collars as clothing; camisoles; boxer shorts; skull caps; bodices being lingerie; underwear; hoods as clothing; hat frames; cap peaks; belts; shawls; dressing gowns; sweaters; chasubles; socks; sock suspenders; garters; stocking suspenders; boot uppers; inner soles; shirts; shirt fronts; short-sleeve shirts; hats; head wear; fittings of metal for footwear; furs being clothing; detachable collars; tights; wet suits for water-skiing; combinations; corselets; suits; ready-made clothing, namely, tops, bottoms, shirts; babies' pants; ear muffs; neckties; footwear uppers; breeches for wear; trousers; cyclists' clothing, namely, tops, bottoms, shirts; outer clothing, namely, tops, bottoms, shirts; gloves; ready-made linings being parts of clothing; sashes for wear; knitwear clothing, namely, shirts, dresses, sweaters; shirt yokes; esparto shoes or sandals; fur stoles; top hats; gabardines; corsets being clothing; corsets being foundation clothing; girdles; galoshes; wimples; gymnastic shoes; coats; waterproof clothing, namely, tops, bottoms, shirts; leggings, namely, leg warmers; jerseys; skirts; clothing layettes; liveries; sports jerseys not for athletic purposes; cuffs; aprons being clothing; muffs; maniples; mittens; slippers; pelerines; pelisses; beach clothes, namely, tops, bottoms, shirts; beach shoes; pockets for clothing; dresses; wooden shoes; sandals; underpants; brassieres; overcoats; heelpieces for

			footwear; togas; welts for footwear; uniforms; stuff jackets; jackets; paper clothing, namely, tops, bottoms, shirts; veils; bathing caps; bathing trunks; bathing suits; bath robes; bibs, not of paper; soles for footwear; heels; footmuffs, not electrically heated, for use as clothing; studs for football boots; headbands; parkas; petticoats; ski boots; slips as undergarments; teddies as undergarments; bandanas being neckerchiefs; clothing for gymnastics, namely, tops, bottoms, shirts; clothing of imitations of leather, namely, tops, bottoms, shirts; clothing of leather, namely, tops, bottoms, shirts; mantillas; masquerade costumes; saris; tee-shirts; turbans; ascots; shower caps; fishing vests; money belts as clothing; pocket squares; paper hats as clothing; sleep masks; skorts; ponchos; sarongs; ski gloves; leggings in the nature of trousers; jumper dresses; visors being headwear; sports singlets; valenki being felted boots; albs in class 025. For: Decorations for Christmas trees; bladders of balls for games; artificial fishing bait; caps for toy pistols; toys for domestic pets; ring games; Christmas trees of synthetic material; bows for archery; archery implements; edges of skis; swings; balls for games; play balloons; billiard table cushions; rocking horses; batting gloves; dolls' feeding bottles; stationary exercise bicycles; billiard balls; chalk for billiard cues; billiard markers; skittles; marbles for games; building blocks as toys; bob-sleighs; explosive bonbons, namely,

			Christmas crackers; skating boots with skates attached; candle holders for Christmas trees; balls for playing games and sports; bowling apparatus and machinery; boxing gloves; gut for rackets; golf clubs; rods for fishing; kites; kite reels; targets; bells for Christmas trees; counters being discs for games; building games; strings for rackets; machines for physical exercises; body-building apparatus; novelties for parties and dances in the nature of paper party favors; shin guards being sports articles; cricket bags, namely, bags specially designed to hold cricket equipment; hockey sticks; dice; chest expanders being exercisers; discuses for sports; dominoes; chess games; chessboards; toy pistols; rollers for stationary exercise bicycles; landing nets for anglers; golf bags, with or without wheels; nets for sports; tennis nets; ski bindings; darts; floats for fishing; foosball tables; harpoon guns; gloves for games; cups for dice; bar-bells; fish hooks; baby rattles; clay pigeon traps; rackets; decoys for hunting or fishing; fishing tackle; lines for fishing; dolls' beds; dolls' houses; puppets; dolls; theatrical masks; carnival masks; scale model vehicles; reels for fishing; flippers for swimming; creels as fishing traps; swimming pools being play articles; artificial snow for Christmas trees; quoits; roller skates; ice skates; seal skins being coverings especially adapted for skis; clay pigeons as targets; surfboards; dolls' clothes; dolls' rooms; Playing cards for use in magic tricks; skittles games; gut for fishing; sole coverings for skis;

			skis; tables for table tennis; spinning tops as toys; sleds being sports articles; backgammon games; scooters as toys; shuttlecocks; air pistols being toys; percussion caps being toys; ornaments for Christmas trees, except illumination articles and confectionery; Christmas tree stands; billiard cues; billiard cue tips; billiard tables; coin-operated billiard tables; surf skis; sailboards; hang gliders; appliances for gymnastics; fencing weapons; fencing masks; fencing gauntlets; baseball gloves; climbers' harness; elbow guards being sports articles for athletic use; knee guards being sports articles for athletic use; mobiles as toys; paragliders; protective paddings being parts of sports suits for athletic use; skateboards; toy slides; spring boards; teddy bears; water skis; golf gloves; bite indicators as fishing tackle; bite sensors as fishing tackle; board games; fairground ride apparatus; flying discs toys; horseshoe games; mah-jong; plush toys; soap bubble making wand and solution sets; toy vehicles; twirling batons; butterfly nets; bags especially designed for skis and surfboards; harness for sailboards; jigsaw puzzles; masts for sailboards; paintball guns; paintballs ammunition for paintball guns; surfboard leashes; tennis ball throwing apparatus; starting blocks for sports; snow globes; weight lifting belts; bodyboards; bingo cards; divot repair tools as golf accessories; hunting game calls; roulette wheels; in-line roller skates; pinatas; punching bags; radio-controlled toy vehicles; rosin

			used by athletes; snowshoes; sling shots being sports articles; amusement machines, automatic and coin-operated; kaleidoscopes; playing cards; confetti; electronic targets for sports; scent lures for hunting or fishing; camouflage screens; men's athletic supporters; snowboards; scale model kits as toys; pachinkos; ascenders being mountaineering equipment; slot machines being gaming machines; paper party hats; swimming kick boards; chips for gambling; scratch cards for playing lottery games; stuffed toys; trampolines; poles for pole vaulting; water wings; swimming belts; swimming jackets; video game machines; portable games with liquid crystal displays; arcade video game machines; controllers for game consoles; toy models; toy figures; ball pitching machines; dumb-bells; masks as playthings; matryoshka dolls being wooden nested Russian dolls; controllers for toys, namely, cars, robots, and planes; action figure toys; electronic action toys; mechanical and electronic action toys; amusement park rides in class 028. For: Advertising services; business management; business administration; providing office functions; business management assistance; business inquiries; bill-posting; import-export agencies; commercial information agencies; cost price analysis; dissemination of advertising matter; photocopying services; employment agencies; book-keeping; drawing up of statements of accounts, namely, administration, billing and

			reconciliation of accounts on behalf of others; business auditing; business management and organization consultancy; personnel management consultancy; business management consultancy; typing; demonstration of goods; direct mail advertising services; commercial and industrial management assistance; document reproduction; updating of advertising material; distribution of samples; business efficiency expert services; auctioneering; conducting marketing studies; business appraisals; business investigations; publicity material rental; business organization consultancy; publication of publicity texts; radio advertising; business research; public relations; shorthand services; television advertising; transcription of communications; shop window dressing; services of advertising agencies; advisory services for business management; modelling for advertising or sales promotion; marketing research; computerized file management; professional business consultancy; economic forecasting services; organization of exhibitions for commercial or advertising purposes; business information; public opinion polling; payroll preparation; personnel recruitment; relocation services for businesses; rental of advertising space; sales promotion for others; secretarial services; tax preparation; telephone answering for unavailable subscribers; word processing; arranging newspaper subscriptions for others; advertising by mail order; business management of hotels; business management of performing artists;

			compilation of information into computer databases; systemization of information into computer databases; organization of trade fairs for commercial or advertising purposes; rental of photocopying machines; on-line advertising on a computer network; rental of advertising time on communication media; news clipping services; rental of vending machines; psychological testing for the selection of personnel; price comparison services; presentation of goods on communication media, for retail purposes, namely, television home shopping services; commercial information and advice for consumers in the nature of a consumer advice shop; arranging subscriptions to telecommunication services for others; administrative processing of purchase orders; commercial administration of the licensing of the goods and services of others; outsourcing services, namely, business management, administration and consultancy; invoicing; writing of publicity texts; compilation of statistics; layout services for advertising purposes; sponsorship search; organization of fashion shows for promotional purposes; production of advertising films; business management of sports people; marketing services; telemarketing services; retail store and wholesale store services featuring pharmaceutical, veterinary and sanitary preparations and medical supplies; rental of sales stands; provision of commercial and business contact information; search engine optimization for sales promotion; web site traffic optimization; pay per click

			advertising; business management for freelance service providers; negotiation and conclusion of commercial transactions for third parties; updating and maintenance of data in computer databases; business project management services for construction projects; providing business information via a web site; provision of an on-line marketplace for buyers and sellers of goods and services; design of advertising materials; outsourced administrative management for companies; tax filing services; rental of billboards; career planning services; presentation of companies and their goods and services on the Internet for promotional purposes; presentation of companies on the Internet and other media for promotional purposes; providing employment information; providing employment information via a global computer network in class 035. For: Accident insurance underwriting services; issue of tokens of value; processing electronic payments made through prepaid cards; issue of tokens of value for payment of transportation expenses; electronic payment, namely, providing electronic processing and transmission of credit card transaction wireless wallets, mobile wallets, electronic wallets, debit and prepaid card transactions; charge card and stored value prepaid card services, namely, processing electronic payments; pre-paid purchase card services namely, processing electronic payments made through prepaid cards; accident insurance

			underwriting; instalment loans; actuarial services; leasing of real estate; credit bureaus; real estate agency services; real estate brokerage; debt collection agency services; insurance brokerage; financial customs brokerage services; insurance underwriting for all types of insurance; banking; real estate appraisal; charitable fund raising; mutual funds investment, distribution and advisory services; capital investment; exchanging money; financial clearing-houses; safe deposit box services; loans financing; fiscal assessments; financial evaluation for insurance, banking, and real estate purposes; factoring agency services; trusteeship representatives; financing services; financial management; pawn brokerage; real estate management services; apartment house management; fire insurance underwriting; rental of apartments; leasing of farms; health insurance underwriting; marine insurance underwriting; mortgage banking; savings bank services; securities brokerage; life insurance underwriting; financial analysis; antique appraisal; art appraisal; check verification; financial consultancy; insurance consultancy; credit card transaction processing services; debit card transaction processing services; electronic funds transfer; financial information; insurance information; jewelry appraisal; numismatic appraisal; rent collection; stamp appraisal; issuance of tokens of value; deposits of valuables, namely, safety deposit box services; stock exchange quotations; issuance of credit cards; real estate services,

			namely, rental of offices; financial sponsorship of sports competitions and special events related thereto; online banking; business liquidation services, financial; repair costs evaluation; brokerage of carbon credits; financial evaluation of standing timber; financial evaluation of wool; stock brokerage services; debt advisory services; arranging finance for construction projects; providing financial information via a web site; financial management of reimbursement payments for others; investment of funds; stocks and bonds brokerage; agencies for trading of commodity futures; brokerage of futures; futures commission merchant services, namely, clearing trades for commodities, futures and foreign exchange; financial services, namely, gold trading; providing information on options markets via a web site; providing information relating to the trading of commodity futures; securities arbitrage services; appraisal of second-hand automobiles; automobile appraisal; consultancy relating to the appraisal of goods; providing information relating to the appraisal of second-hand automobiles in class 036. For: Radio broadcasting; electronic message sending; television broadcasting; transmission of telegrams; telegraph services; communications by telegrams; telephone communication services; communications by telephone; communications through an international system of telegraphy with printed messages transmitted and received by teleprinters using

			the public telecommunications network; news agencies, namely, the transmission of news items to news reporting organizations; cable television broadcasting; communications by cellular phones; communications by computer terminals; computer aided transmission of messages and images; electronic transmission of e-mail; facsimile transmission; information about telecommunication; paging services for radio, telephone or other means of electronic communication; rental of message sending apparatus for communications purposes; rental of facsimile apparatus; rental of modems; rental of telecommunication equipment; rental of telephones; satellite transmission; electronic bulletin board services; providing telecommunications connections to a global computer network; telecommunications routing and junction services; teleconferencing services; providing user access to global computer networks; rental of access time to global computer networks; providing telecommunication channels for teleshopping services; providing Internet chatrooms; providing access to databases; voice mail services; transmission of greeting cards online; transmission of digital files; wireless broadcasting; videoconferencing services; providing online forums for transmission of messages among computer users; streaming of data; radio communications in class 038. For: Education services, namely, providing classes of instruction in

			the field of video games; organizing community sporting activities; providing online non-downloadable software for playing games, namely, providing on-line computer games; game cafe services, namely, providing facilities for playing computer games with installed video game machines in an Internet cafe environment; providing on-line journals, namely, blogs featuring user-defined content in the field of social-networking; providing information about computer games using communication by an electronic computer terminal; providing information about computer games via a cellular phone; providing information via the Internet about computer games using communication by hand-held games with liquid crystal displays; providing games using communication by an electronic computer terminal, namely, providing on-line computer games; providing on-line computer games using communication by a cellular phone; providing on-line computer games using communication by hand-held games with liquid crystal displays; providing on-line non-downloadable consumer video games; providing non-downloadable music, sound and image data using Internet; computer game services provided on-line from a computer network; amusement park services; animal training; rental of movie projectors and accessories; movie studios services; circuses; Providing education in the field of computers, music, art rendered through correspondence courses; physical education; rental of show scenery;

			providing recreation facilities; radio entertainment production; publication of texts, other than publicity texts; rental of sound recordings; rental of cine-films; film production, other than advertising films; gymnastic instruction; lending libraries; publication of books; rental of radio and television sets; production of radio and television programmes; music-halls; orchestra services; entertainment in the nature of theatre productions; production of television shows; television entertainment, namely, ongoing television programs in the field of computer games, video games, animated films and animated cartoons; rental of stage scenery; zoological garden services; providing sports facilities; modelling for artists; mobile library services; providing casino facilities for gambling; entertainment and education club services, namely, after-hours night club services; arranging and conducting of educational conferences; arranging and conducting of educational congresses in the field of business; discotheque services; information about education; educational examination services; entertainment information; organization of exhibitions for cultural or educational purposes; gambling services; providing golf facilities; health club services, namely, providing health and fitness training; holiday camp services; presentation of live show performances; cinema theater presentations; nursery schools; organization of sports competitions; party planning; providing museum

			facilities presentation and exhibitions; recording studio services; recreation information; rental of skin diving equipment; rental of sports equipment, except vehicles; rental of stadium facilities; rental of video cassette recorders; rental of videotapes; sport camp services; timing of sports events; boarding school education; arranging of beauty contests; booking of seats for shows; dubbing; providing classes of instruction in the field of religious education; operating lotteries; organization of balls; organization of live music shows, namely, impresario services; providing amusement arcade services; rental of audio equipment; rental of lighting apparatus for theatrical sets or television studios; rental of tennis courts; rental of video cameras; scriptwriting services for non-advertising purposes; videotape editing; publication of electronic books and journals on-line; electronic desktop publishing; subtitling; electronic game services provided on-line from a computer network; providing karaoke facility services; music composition services; night clubs; providing on-line non-downloadable electronic publications in the nature of books and journals in the field of business; publication of electronic books and journals in the field of business; photographic reporting; photography; vocational guidance; news reporters services; translation; sign language interpretation; videotaping; microfilming; ticket agency services for entertainment events; writing of texts, other than

			publicity texts, namely, writing of articles for professional journals other than for advertising or publicity; arranging and conducting of concerts; calligraphy services; layout services, other than for advertising purposes; organization of fashion shows for entertainment purposes; coaching in the field of sports; rental of sports grounds; disc jockey services; language interpreter services; personal trainer services fitness training; conducting fitness classes; production of music; toy rental; games equipment rental; providing on-line music, not downloadable; providing on-line videos, namely, providing a web site featuring non-downloadable instructional videos in the field of computer games, video games, animated films and animated cartoons; rental of cameras; rental of musical instruments; rental of paintings and calligraphic works; rental of film negatives; operation of audio equipment for production of radio programs; operation of video and audio equipment for production of television programs; providing information on-line relating to computer games and computer enhancements for games; providing on-line computer games; providing on-line information and news in the field of employment training; providing zip line rides for recreational purposes; amusement arcade services; amusement park and theme park services; entertainment in the nature of a water park and amusement center; entertainment in the nature of an amusement park ride; providing amusement facilities in class 041.

			For: Design and development of computer hardware and software; Software as a service, namely, providing non-downloadable operating system software with regard to infrastructures on the Internet, intranet and extranet in the fields gaming and wagering; providing temporary use of non-downloadable software for the operation of gaming and wagering websites on the Internet; design, development and maintenance of computer software and online game websites for others; design, development and maintenance of computer software and online game sites; chemical analysis; analysis for oil-field exploitation; architectural services; bacteriological research; chemistry services, namely, research in the field of chemistry; chemical research; architectural consultation; construction drafting; oil-well testing; cosmetics research; design of interior decor; industrial design; packaging design; material testing; geological surveys; oil-field surveys; engineering; meteorological information; land surveying; computer rental; computer programming; oil prospecting; physics research; mechanical research; textile testing; geological prospecting; geological research; authenticating works of art; calibration; computer software design; updating of computer software; consultancy in the design and development of computer hardware; dress designing; graphic arts design; quality control for others; rental of computer software; research and development of new products for others; styling, namely,

			industrial design; underwater exploration; recovery of computer data; maintenance of computer software; computer system analysis; biological research; urban planning; surveying; computer system design services; vehicle roadworthiness testing; duplication of computer programs; conversion of data or documents from physical to electronic media; creating and maintaining web sites for others; hosting the computer sites on a computer server for a global computer network; installation of computer software; cloud seeding; data conversion of computer programs and data not physical conversion; computer software consultancy; rental of web servers; computer virus protection services; consultancy in the field of energy-saving for scientific research purposes; research in the field of environmental protection; providing search engines for the Internet; digitization of documents; handwriting analysis, namely, graphology; provision of scientific information, advice and consultancy in relation to carbon offsetting; quality evaluation of standing timber; quality evaluation of wool; monitoring of computer systems by remote access for detecting unauthorized access or data breach; water analysis; scientific laboratory services; energy auditing; web site design consultancy; consulting services in the field of software as a service (SaaS); information technology consultancy; scientific research; server hosting; conducting clinical trials for others; off-site data backup; electronic data storage;

			providing information on computer technology and programming via a web site; cartography services; cloud computing consultancy; technological consultancy in the field of computer systems; telecommunications technology consultancy; weather forecasting; technical advice relating to operation of computers; rental of measuring apparatus; rental of laboratory apparatus and instruments; rental of technical drawing instruments; development of computer game software; development of computer hardware; development of computer software; development of computer software application solutions; development of computer systems in class 042. For: Services for providing food and drink in restaurants; providing temporary accommodation; accommodation bureau, namely, providing services of hotels and boarding houses; food and drink catering; retirement home services; cafes; cafeterias; providing campground facilities; canteen services; rental of temporary accommodation; boarding house services; tourist home services; hotels; day-nurseries in the nature of creches; restaurants; boarding house bookings; making hotel reservations for others; self-service restaurants; snack-bars; boarding for animals; bar services; providing temporary lodging for holiday camp services; temporary accommodation reservations; motel services; rental of chairs, tables, table linen, glassware; rental of meeting rooms; rental of tents; rental of cooking

			apparatus; rental of drinking water dispensers; food sculpting; rental of futon and quilts for hotels; rental of towels for hotels in class 043. For: Legal services; security services for the protection of property and individuals, namely, surveillance services; personal body guarding; detective agency services; dating services; night guard services; locksmithing, namely, opening of security locks; evening dress rental; crematorium services; missing person investigations; funeral arrangement services; funerary service undertaking; clothing rental; guard services; marriage agencies, namely, conducting civil marriage ceremony services; physical security consultancy; horoscope casting; fire-fighting; organization of religious prayer meetings; adoption agency services; monitoring of burglar and security alarms; babysitting; baggage handling inspections for airlines; house sitting; pet sitting; personal background investigations; lost property return; mediation; inspection of factories for safety purposes; rental of fire alarms; rental of fire extinguishers; arbitration services; intellectual property consultancy; copyright management; licensing of intellectual property; monitoring intellectual property rights for legal advisory purposes; legal research; litigation services; licensing of computer software; registration of domain names; alternative dispute resolution services; rental of safes; genealogical research; planning and arranging of wedding ceremonies;

			on-line social networking services; releasing doves for special occasions; embalming services; legal document preparation services; tracking of stolen property; legal administration of licenses; consultancy services in the field of personal fashion; information about personal wardrobe styling services; information relating to fashion coordination services for individuals; personal styling services consisting of bra measuring and fitting services; personal styling services consisting of measuring and fitting services for ladies' lingerie; personal wardrobe styling services; providing grave spaces or charnel houses; legal services relating to social insurance claims; rental of altars; rental of jewelry; licensing of computer software via networks in class 045.
6,039,333		Apr. 28, 2020	For: Dolls; stuffed toys; toy action figures; trading card games in class 028.
2,315,166	SEGA	Feb. 8, 2000	For: Video game machines for use with televisions; electronic gaming machines; video game software; computer game software in class 009.
3,245,697	SEGA	May 29, 2007	For: T-shirts; shirts in class 025.
3,491,509	DREAMCAST	Aug. 26, 2008	For: Video game software, computer game programs in class 009.

1,690,329	GENESIS	Jun. 2, 1992	For: Video output game machines; software for video output game machines; attachments for video output game machines; namely, joystick controllers and joypad controllers; and carrying cases and storage containers for the foregoing in class 028.
3,358,022	SEGA GENESIS COLLECTION	Dec. 18, 2007	For: Home video game software, video game software for hand-held game machines in class 009.
3,713,204	SONIC'S ULTIMATE GENESIS COLLECTION	Nov. 17, 2009	For: Video game software in class 009.
8,131,860		Feb. 10, 2026	For: Downloadable computer game programs; recorded computer game programs; downloadable computer game software; recorded computer game software; downloadable video game software; recorded video game software; downloadable video game programs; recorded video game programs; video game discs and cartridges; downloadable computer game software for use on mobile and cellular phones; mobile phone straps; protective cases for cell phones; downloadable multimedia files featuring graphics, images, and video recordings for computers, video game machines and mobile phones featuring scenes and characters based on computer and video games; downloadable computer game and video game software; downloadable music files via a global computer network and wireless devices; sound recordings recorded on compact discs featuring music, video game sounds and dialogues; prerecorded compact

			discs, magnetic audio tapes, and downloadable multimedia files featuring music; prerecorded video discs and magnetic audio tapes featuring music, comedy, drama, action, adventure and animation; electronic publications, namely, downloadable books and magazines in the field of computer games, video games, cartoons and music; audio recordings featuring music; downloadable software for generating cryptographic keys for receiving and spending crypto assets; downloadable computer software for managing crypto asset transactions using blockchain technology; downloadable or recorded application software for operating and managing blockchain technology; downloadable virtual reality game software; downloadable multimedia files containing texts, image files of accessories for computer game and video game avatars, video recordings featuring movie clips and memes, music files, and audio files featuring music and dialogue related to computer games and video games authenticated by non-fungible tokens (NFTs); downloadable image files containing trading cards authenticated by non-fungible tokens (NFTs); sunglasses; rechargeable batteries in Class 009. For: Key rings; key chains; jewelry boxes; ornaments of precious metal

			in the nature of jewelry; badges of precious metal; charms for key rings or key chains; jewelry charms; clocks and watches in Class 014. For: Pastes and other adhesives for stationery or household purposes; hygienic hand towels of paper; table napkins of paper; hand towels of paper; handkerchiefs of paper; stationery; stickers being stationery; printed matter, namely, comic books, instruction manuals, children's books, children's activity books, songbooks, children's magazines and magazines in the field of computer games, video games, cartoons and music; printed picture books and printed reference books in the field of computer games, video games, cartoons and music; printed catalogues in the field of computer games, video games, cartoons and music; printed calendars; printed general feature magazines in the field of computer games, video games, cartoons and music; printed books, namely, coloring books, date books; printed pamphlets in the field of computer games, video games, cartoons and music; printed trading cards other than for games; printed instructional and teaching material in the field of computer games, video games, cartoons and music; printed photographs; paper party decorations in Class 016.

			For: Clothing for pets; bags, namely, book bags, sports bags, all-purpose reusable carrying bags; carry-on bags; shoulder bags; school bags; travelling bags; pouches, namely, leather pouches, coin pouches, pouches for holding keys; boston bags; rucksacks; card cases, namely, business card cases, credit card cases; key cases; wallets; purses; commutation ticket holders of leather in the nature of leather wallets; business card cases; unfitted vanity cases; umbrellas; walking sticks; canes; handles for canes and walking sticks; saddlery in Class 018. For: Clothing, namely, t-shirts, shirts, sweaters, sweatshirts, jackets, pajamas, coats, swimwear, mufflers as neck scarves, gloves, scarves, neck ties, socks, underwear, pants, jeans, shorts, skirts, underpants, robes; shoes; footwear; beach shoes; boots; galoshes; half-boots; lace boots; sandals; sneaker; sports shoes; wooden shoes; heels, namely, high-heel shoes; masquerade costumes; play costumes, namely, costumes for use in children's dress up play, costumes for use in role-playing games; clothes for sports, namely, sports jerseys and breeches for sports; boots for sports; headwear, namely hats and caps in Class 025. For: Coin-operated video games; arcade game machines; arcade

			video game machines; amusement game machines with built-in screens; toy vehicles; dolls; stuffed toys; toy figures; toy action figures; trading card games; playing cards; arcade redemption game machines which dispense tickets or tokens to successful players; arcade crane game machines which dispense tickets or tokens to successful players; gaming machines, namely, slot machines; amusement park rides; ornaments for Christmas trees, except lights, candles and confectionery; swimming jackets; sporting articles, namely, balls for sports in Class 028. For: Beer; fruit-flavored carbonated drinks; fruit juices; vegetable juice beverages; extracts of hops for making beer; whey beverages; soft drinks in Class 032. For: Entertainment services, namely, providing on-line video games and on-line computer games; providing entertainment information in the field of on-line games; entertainment services, namely, providing non-downloadable on-line computer graphics presented to mobile communications devices via a global computer network and wireless networks, non-downloadable on-line videos and images featuring scenes and characters based on computer and video games by computer networks,

			video game machines and mobile phones; providing amusement facilities; providing amusement arcade services; providing amusement parks; entertainment services, namely, organization, production and presentation of video and computer game contests and tournaments; providing entertainment information about amusement facilities; providing on-line music, not downloadable; providing recreation facilities; presentation of live show performances in Class 041.
8,330,234	SHADOW THE HEDGEHOG	Jul. 7, 2026	For: Electronic publications, namely, downloadable books and magazines in the field of computer games, video games, cartoons and music, none of the foregoing in relation to educational goods; downloadable computer game programs; recorded computer game programs; downloadable computer game software; recorded computer game software; downloadable video game software; recorded video game software; downloadable video game programs; recorded video game programs; video game discs and cartridges; downloadable computer game software for use on mobile and cellular phones; mobile phone straps; protective cases for cell phones; downloadable multimedia files featuring graphics, images, and video recordings for computers, video game machines and mobile phones featuring scenes and characters based on computer

			and video games; downloadable computer game and video game software; downloadable music files via a global computer network and wireless devices; sound recordings recorded on compact discs featuring music, video game sounds and dialogues; prerecorded compact discs and downloadable multimedia files containing audio, both featuring music; prerecorded video discs featuring music, comedy, drama, action, adventure and animation; downloadable music files featuring musical audio recordings; downloadable software for generating cryptographic keys for receiving and spending crypto assets in the nature of cryptocurrency; downloadable computer software for managing crypto asset in the nature of cryptocurrency transactions using blockchain technology; downloadable virtual reality game software; downloadable multimedia files containing texts, image files of accessories for computer game and video game avatars, video recordings featuring movie clips and memes, music files, and audio files featuring music and dialogue related to computer games and video games authenticated by non-fungible tokens (NFTs); downloadable image files containing trading cards authenticated by non-fungible tokens (NFTs) in Class 009.

			For: Pastes and other adhesives for stationery or household purposes; hygienic hand towels of paper; table napkins of paper; hand towels of paper; handkerchiefs of paper; stationery; stickers being stationery; printed matter, namely, comic books, instruction manuals, children's books, children's activity books, songbooks, children's magazines and magazines in the field of computer games, video games, cartoons and music; printed picture books and printed reference books in the field of computer games, video games, cartoons and music; printed catalogues in the field of computer games, video games, cartoons and music; printed calendars; printed general feature magazines in the field of computer games, video games, cartoons and music; printed books, namely, coloring books, date books; printed pamphlets in the field of computer games, video games, cartoons and music; printed trading cards other than for games; printed instructional and teaching material in the field of computer games, video games, cartoons and music; printed photographs; none of the foregoing in relation to educational goods in Class 016. For: Clothing for pets; all-purpose carrying bags; carry-on bags; shoulder bags; school bags; travelling bags; waist pouches; boston bags; rucksacks; card cases

			being notecases; key cases; wallets; purses; commutation ticket holders of leather, namely, ticket pouches; business card cases; unfitted vanity cases; umbrellas; walking sticks; canes; handles for canes and walking sticks; saddlery in Class 018. For: Clothing, namely, t-shirts, shirts, sweaters, sweatshirts, jackets, pajamas, coats, swimwear, mufflers as neck scarves, gloves, scarves, neckties, socks, underwear, pants, jeans, shorts, skirts, underpants, robes; shoes; footwear; beach shoes; boots; galoshes; half-boots; lace boots; sandals; sneaker; sports shoes; wooden shoes; heels, namely, high-heel shoes; masquerade costumes; play costumes, namely, costumes for use in children's dress up play, costumes for use in role-playing games; clothes for sports, namely, sports jerseys and breeches for sports; boots for sports; headwear, namely hats and caps in Class 025. For: Coin-operated video games; arcade game machines; arcade video game machines; amusement game machines with built-in screens; toy vehicles; dolls; stuffed toys; toy figures; toy action figures; trading card games; playing cards; arcade redemption game machines which dispense tickets or tokens to successful players; arcade crane game machines which dispense

			tickets or tokens to successful players; gaming machines, namely, slot machines in Class 028. For: Entertainment services, namely, providing on-line video games and on-line computer games; providing entertainment information in the field of on-line games; entertainment services, namely, providing temporary use of non-downloadable on-line interactive games featuring graphics, videos, and images featuring scenes and characters based on computer and video games by computer networks, video game machines and mobile phones; providing amusement facilities; providing amusement arcade services; providing amusement parks; entertainment services, namely, organization, production and presentation of video and computer game contests and tournaments; providing entertainment information about amusement facilities; providing on-line music, not downloadable in Class 041.

17. The U.S. registrations for the Sega Trademarks are valid, subsisting, and in full force and effect, and some are incontestable pursuant to 15 U.S.C. § 1065. The registrations for the Sega Trademarks constitute *prima facie* evidence of their validity and of Sega's exclusive right to use the Sega Trademarks pursuant to 15 U.S.C. § 1057(b). True and correct copies of the United States Registration Certificates for the Sega Trademarks are attached hereto as **Exhibit 2**.

18. The Sega Trademarks are exclusive to Sega and are displayed extensively on Sega Products and in marketing and promotional materials. The Sega Trademarks are also distinctive when applied to Sega Products, signifying to the purchaser that the products come from Sega and are manufactured to Sega's quality standards. Whether Sega manufactures the products itself or contracts with others to do so, Sega has ensured that its products bearing the Sega Trademarks are manufactured to the highest quality standards.

19. The Sega Trademarks are famous marks, as that term is used in 15 U.S.C. § 1125(c)(1) and have been continuously used and never abandoned. The innovative marketing and product designs of Sega Products have enabled the Sega and Sonic the Hedgehog brands to achieve widespread recognition and fame and have made the Sega Trademarks some of the most well-known marks in the video game and entertainment industries. The widespread fame, outstanding reputation, and significant goodwill associated with the Sega and Sonic the Hedgehog brands have made the Sega Trademarks valuable assets of Sega.

20. The Sega Trademarks have been the subject of substantial and continuous marketing and promotion by Sega. Sega has and continues to market and promote the Sega Trademarks in the industry and to consumers through traditional print media, authorized retailers, the official Sega website shop.sega.com, social media sites, and point of sale material.

21. Sega has expended substantial time, money, and other resources in advertising and promoting the Sega Trademarks. Specifically, Sega has expended substantial resources in advertising, promoting, and marketing featuring the Sega Trademarks. Sega Products have also been the subject of extensive unsolicited publicity resulting from their high-quality, innovative designs. As a result, products bearing the Sega Trademarks are widely recognized and exclusively associated by consumers as being high-quality products sourced from Sega. Sega Products have

become among the most popular of their kind in the world. The Sega Trademarks have achieved tremendous fame and recognition, adding to the inherent distinctiveness of the marks. As such, the goodwill associated with the Sega Trademarks is of immeasurable value to Sega.

22. Sega Products are sold only through authorized retail channels and are recognized by the public as being exclusively associated with the Sega and Sonic the Hedgehog brands.

23. Defendants are unknown individuals and business entities who own and/or operate one or more of the e-commerce stores under the Seller Aliases identified on Schedule A and/or other seller aliases not yet known to Sega. On information and belief, Defendants reside and/or operate in foreign jurisdictions and redistribute products from the same or similar sources in those locations. Defendants have the capacity to be sued pursuant to Federal Rules of Civil Procedure 17(b).

24. On information and belief, Defendants, either individually or jointly, operate one or more e-commerce stores under the Seller Aliases listed in Schedule A attached hereto. Tactics used by Defendants to conceal their identities and the full scope of their operation make it virtually impossible for Sega to learn Defendants' true identities and the exact interworking of their network. If Defendants provide additional credible information regarding their identities, Sega will take appropriate steps to amend the Complaint.

IV. DEFENDANTS' UNLAWFUL CONDUCT

25. The success of the Sega and Sonic the Hedgehog brands has resulted in significant counterfeiting of the Sega Trademarks and infringement of the Sega Copyrighted Works. Because of this, Sega has implemented a brand protection program by investigating suspicious websites and online marketplace listings identified in proactive Internet sweeps. Recently, Sega has identified many fully interactive e-commerce stores offering Unauthorized Products on online

marketplace platforms like Amazon.com, Inc. ("Amazon"), eBay, Inc. ("eBay"), and Walmart, Inc. ("Walmart"), including the e-commerce stores operating under the Seller Aliases. The Seller Aliases target consumers in this Judicial District and throughout the United States. According to a report prepared for The Buy Safe America Coalition, most infringing products now come through international mail and express courier services because of increased sales from foreign online infringers. *The Counterfeit Silk Road: Impact of Counterfeit Consumer Products Smuggled Into the United States*, prepared by John Dunham & Associates (**Exhibit 3**).

26. Because the infringing products sold by offshore online infringers do not enter normal retail distribution channels, the US economy lost an estimated 300,000 or more full-time jobs in the wholesale and retail sectors alone in 2020. *Id.* When accounting for lost jobs from suppliers that would serve these retail and wholesale establishments, and the lost jobs that would have been induced by employees re-spending their wages in the economy, the total economic impact resulting from the sale of infringing products was estimated to cost the United States economy over 650,000 full-time jobs that would have paid over $33.6 billion in wages and benefits. *Id.* Additionally, it is estimated that the importation of infringing goods cost the United States government nearly $7.2 billion in personal and business tax revenues in the same period. *Id.*

27. Furthermore, online marketplace platforms like those used by Defendants do not adequately subject new sellers to verification and confirmation of their identities, allowing infringers to "routinely use false or inaccurate names and addresses when registering with these e-commerce platforms." **Exhibit 4**, Daniel C.K. Chow, *Alibaba, Amazon, and Counterfeiting in the Age of the Internet*, 40 NW. J. INT'L L. & BUS. 157, 186 (2020); *see also* report on "Combating Trafficking in Counterfeit and Pirated Goods" prepared by the U.S. Department of Homeland

Security's Office of Strategy, Policy, and Plans (Jan. 24, 2020), attached as **Exhibit 5**, and finding that on "at least some e-commerce platforms, little identifying information is necessary for a counterfeiter to begin selling" and that "[t]he ability to rapidly proliferate third-party online marketplaces greatly complicates enforcement efforts, especially for intellectual property rights holders." Infringers hedge against the risk of being caught and having their websites taken down from an e-commerce platform by establishing multiple virtual storefronts. **Exhibit 5** at p. 22. Since platforms generally do not require a seller on a third-party marketplace to identify the underlying business entity, infringers can have many different profiles that can appear unrelated even though they are commonly owned and operated. **Exhibit 5** at p. 39. Further, "[e]-commerce platforms create bureaucratic or technical hurdles in helping brand owners to locate or identify sources of [infringing products] and [infringers]." **Exhibit 4** at 186-187. Specifically, brand owners are forced to "suffer through a long and convoluted notice and takedown procedure only [for the infringer] to reappear under a new false name and address in short order." *Id.* at p. 161.

28. Defendants have targeted sales to Illinois residents by setting up and operating e-commerce stores that target United States consumers using one or more Seller Aliases; offer shipping to the United States, including Illinois; accept payment in U.S. dollars; and, on information and belief, sell Unauthorized Products to residents of Illinois. **Exhibit 6** attached hereto is evidence of the Defendants offering for sale and/or selling Unauthorized Products to Illinois.

29. Defendants concurrently employ and benefit from similar advertising and marketing strategies. For example, Defendants facilitate sales by designing the e-commerce stores operating under the Seller Aliases so that they appear to unknowing consumers to be authorized online retailers, outlet stores, or wholesalers. E-commerce stores operating under the Seller Aliases

appear sophisticated and accept payment in U.S. dollars via numerous methods, including credit cards, Amazon Pay, PayPal, and/or Stripe. E-commerce stores operating under the Seller Aliases often include content and images that make it very difficult for consumers to distinguish such stores from an authorized retailer. Sega has not licensed or authorized Defendants to use any of the Sega Trademarks and/or to copy or distribute the Sega Copyrighted Works, and none of the Defendants are authorized retailers of Sega Products.

30. Many Defendants also deceive unknowing consumers by using the Sega Trademarks without authorization within the content, text, and/or meta tags of their e-commerce stores to attract consumers using search engines to find websites relevant to Sega Products. Other e-commerce stores operating under the Seller Aliases omit using the Sega Trademarks in the item title to evade enforcement efforts while using strategic item titles and descriptions that will trigger their listings when consumers are searching for Sega Products.

31. E-commerce store operators like Defendants commonly engage in fraudulent conduct when registering the Seller Aliases by providing false, misleading and/or incomplete information to e-commerce platforms to prevent discovery of their true identities and the scope of their e-commerce operation.

32. E-commerce store operators like Defendants regularly register or acquire new seller aliases for the purpose of offering for sale and selling Unauthorized Products. Such seller alias registration patterns are one of many common tactics used by e-commerce store operators like Defendants to conceal their identities and the full scope and interworking of their operation, and to avoid being shut down.

33. Defendants are collectively causing harm to Sega's goodwill and reputation because the effect of their unlawful actions taken together amplifies each harm and creates a single

negative consumer impression. Defendants' activities, occurring at the same time and in the same retail space and manner as one another, blend together to create a single negative impression on consumers such that they constitute the same occurrence or series of occurrences. The combination of all Defendants engaging in the same illegal activity in the same time span causes collective harm to Sega in a way that individual actions, occurring alone, might not.

34. E-commerce store operators like Defendants communicate with each other through QQ.com chat rooms and utilize websites, like sellerdefense.cn, that provide tactics for operating multiple online marketplace accounts and evading detection by brand owners. Websites like sellerdefense.cn also tip off e-commerce store operators like Defendants of new intellectual property infringement lawsuits filed by brand owners, such as Sega, and recommend that e-commerce operators cease their infringing activity, liquidate their associated financial accounts, and change the payment processors that they currently use to accept payments in their online stores.

35. Infringers, such as Defendants, typically operate under multiple seller aliases and payment accounts so that they can continue operation despite Sega's enforcement. E-commerce store operators like Defendants maintain off-shore bank accounts and regularly move funds from their financial accounts to off-shore accounts outside the jurisdiction of this Court to avoid payment of any monetary judgment awarded to Sega.

36. Defendants are working to knowingly and willfully manufacture, import, distribute, offer for sale, and/or sell Unauthorized Products in the same transaction, occurrence, or series of transactions or occurrences. Defendants, without any authorization or license from Sega, have knowingly and willfully used, and continue to use, the Sega Trademarks and/or copies of the Sega Copyrighted Works in connection with the advertisement, distribution, offering for sale, and/or sale of Unauthorized Products into the United States and Illinois over the Internet.

37. Defendants' unauthorized use of the Sega Trademarks and/or Sega Copyrighted Works in connection with the advertising, distribution, offering for sale, and/or sale of Unauthorized Products into the United States, including Illinois, is likely to cause, and has caused, confusion, mistake, and deception by and among consumers and is irreparably harming Sega.

COUNT I
TRADEMARK INFRINGEMENT AND COUNTERFEITING (15 U.S.C. § 1114)

38. Sega hereby re-alleges and incorporates by reference the allegations set forth in the preceding paragraphs.

39. This is a trademark infringement action against certain Defendants[3] based on their unauthorized use in commerce of counterfeit imitations of the Sega Trademarks in connection with the sale, offering for sale, distribution, and/or advertising of infringing goods. The Sega Trademarks are highly distinctive marks. Consumers have come to expect the highest quality from Sega Products offered, sold, or marketed under the Sega Trademarks.

40. Certain Defendants have offered to sell, sold, marketed, distributed, and/or advertised, and are still offering for sale, selling, marketing, distributing, and/or advertising products using counterfeit reproductions of the Sega Trademarks without Sega's permission.

41. Sega owns the Sega Trademarks. Sega's United States registrations for the Sega Trademarks are in full force and effect. Upon information and belief, certain Defendants have knowledge of Sega's rights in the Sega Trademarks and are willfully infringing and intentionally using infringing and counterfeit versions of the Sega Trademarks. Those Defendants' willful, intentional, and unauthorized use of the Sega Trademarks is likely to cause, and is causing,

[3] Count I applies to all Defendants who infringed the Sega Trademarks, as outlined in Schedule A attached hereto.

confusion, mistake, and deception as to the origin and quality of the Unauthorized Products among the general public.

42. Certain Defendants' activities constitute willful trademark infringement and counterfeiting under Section 32 of the Lanham Act, 15 U.S.C. § 1114.

43. Sega has no adequate remedy at law, and if certain Defendants' actions are not enjoined, Sega will continue to suffer irreparable harm to its reputation and the goodwill of the Sega Trademarks.

44. The injuries and damages sustained by Sega have been directly and proximately caused by certain Defendants' wrongful reproduction, use of advertisement, promotion, offering to sell, and/or sale of Unauthorized Products.

COUNT II
FALSE DESIGNATION OF ORIGIN (15 U.S.C. § 1125(a))

45. Sega hereby re-alleges and incorporates by reference the allegations set forth in the preceding paragraphs.

46. Certain Defendants'[4] promotion, marketing, offering for sale, and/or sale of Unauthorized Products has created and is creating a likelihood of confusion, mistake, and deception among the general public as to the affiliation, connection, or association with Sega or the origin, sponsorship, or approval of the Unauthorized Products by Sega.

47. By using the Sega Trademarks in connection with the offering for sale and/or sale of Unauthorized Products, certain Defendants create a false designation of origin and a misleading representation of fact as to the origin and sponsorship of the Unauthorized Products.

[4] Count II applies to all Defendants who infringed the Sega Trademarks, as outlined in Schedule A attached hereto.

48. Certain Defendants' false designation of origin and misrepresentation of fact as to the origin and/or sponsorship of the Unauthorized Products to the general public involves the use of counterfeit marks and is a willful violation of Section 43 of the Lanham Act, 15 U.S.C. § 1125(a).

49. Sega has no adequate remedy at law and will continue to suffer irreparable harm to its reputation and the associated goodwill of the Sega and Sonic the Hedgehog brands if certain Defendants' actions are not enjoined.

COUNT III
COPYRIGHT INFRINGEMENT OF UNITED STATES COPYRIGHT REGISTRATIONS (17 U.S.C. §§ 106 and 501)

50. Sega hereby re-alleges and incorporates by reference the allegations set forth in the preceding paragraphs.

51. The Sega Copyrighted Works constitute original works and copyrightable subject matter pursuant to the Copyright Act, 17 U.S.C. § 101, *et seq*.

52. Sega owns the Sega Copyrighted Works. Sega has complied with the registration requirements of 17 U.S.C. § 411(a) for the Sega Copyrighted Works. The Sega Copyrighted Works are protected by copyright registration numbers which were duly issued to Sega by the United States Copyright Office. At all relevant times, Sega has been, and still is, the owner of all rights, title, and interest in the Sega Copyrighted Works, which have never been assigned, licensed, or otherwise transferred to Defendants.

53. The Sega Copyrighted Works are published on the internet and available to Defendants online. As such, Defendants had access to the Sega Copyrighted Works via the internet.

54. Without authorization from Sega, or any right under the law, certain Defendants[5] have deliberately copied, displayed, distributed, reproduced, and/or made derivative works incorporating the Sega Copyrighted Works on e-commerce stores operating under the Seller Aliases and the corresponding Unauthorized Products. Certain Defendants' derivative works are virtually identical to and/or are substantially similar to the look and feel of the Sega Copyrighted Works. Such conduct infringes and continues to infringe the Sega Copyrighted Works in violation of 17 U.S.C. § 501(a) and 17 U.S.C. §§ 106(1)–(3), (5).

55. Certain Defendants reap the benefits of the unauthorized copying and distribution of the Sega Copyrighted Works in the form of revenue and other profits that are driven by the sale of Unauthorized Products.

56. Certain Defendants have unlawfully appropriated Sega's protectable expression by taking material of substance and value and creating Unauthorized Products that capture the total concept and feel of the Sega Copyrighted Works, including the distinctive characters embodied therein.

57. On information and belief, certain Defendants' infringement has been willful, intentional, purposeful, and in disregard of and with indifference to Sega's rights.

58. Certain Defendants, by their actions, have damaged Sega in an amount to be determined at trial.

59. Certain Defendants' conduct is causing and, unless enjoined and restrained by this Court, will continue to cause Sega great and irreparable injury that cannot fully be compensated or measured in money. Sega has no adequate remedy at law. Pursuant to 17 U.S.C. § 502, Sega is

[5] Count III applies to all Defendants who infringed the Sega Copyrighted Works, as outlined in Schedule A attached hereto.

entitled to a preliminary and permanent injunction prohibiting further infringement of the Sega Copyrighted Works.

PRAYER FOR RELIEF

WHEREFORE, Sega prays for judgment against Defendants as follows:

1) That Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under, or in active concert with them be temporarily, preliminarily, and permanently enjoined and restrained from:

    a. using the Sega Trademarks or any reproductions, counterfeit copies or colorable imitations thereof in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a Sega Product or is not authorized by Sega to be sold in connection with the Sega Trademarks;

    b. reproducing, distributing copies of, making derivative works of, or publicly displaying the Sega Copyrighted Works in any manner without the express authorization of Sega;

    c. passing off, inducing, or enabling others to sell or pass off any products as Sega Products or any other product produced by Sega, that is not Sega's or not produced under the authorization, control, or supervision of Sega and approved by Sega for sale under the Sega Trademarks and/or Sega Copyrighted Works;

    d. committing any acts calculated to cause consumers to believe that Defendants' Unauthorized Products are those sold under the authorization, control, or supervision of Sega, or are sponsored by, approved by, or otherwise connected with Sega;

e. further infringing the Sega Trademarks and/or Sega Copyrighted Works and damaging Sega's goodwill; and

f. manufacturing, shipping, delivering, holding for sale, transferring, or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for Sega, nor authorized by Sega to be sold or offered for sale, and which bear any of the Sega Trademarks, or any reproductions, counterfeit copies or colorable imitations thereof and/or which bear the Sega Copyrighted Works;

2) Entry of an Order that, upon Sega's request, those with notice of the injunction, including without limitation, any websites and/or online marketplace platforms like Amazon, eBay, and Walmart shall disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of counterfeit and infringing goods using the Sega Trademarks and/or Sega Copyrighted Works;

3) That certain Defendants account for and pay to Sega all profits realized by those Defendants by reason of those Defendants' unlawful acts herein alleged, and that the amount of damages for infringement of the Sega Trademarks be increased by a sum not exceeding three times the amount thereof as provided by 15 U.S.C. § 1117;

4) In the alternative, that Sega be awarded statutory damages for willful trademark counterfeiting pursuant to 15 U.S.C. § 1117(c)(2) of $2,000,000 for each and every use of the Sega Trademarks;

5) As a direct and proximate result of certain Defendants' infringement of the Sega Copyrighted Works, Sega is entitled to damages as well as those Defendants' profits, pursuant to 17 U.S.C. § 504(b);

6) Alternatively, and at Sega's election prior to any final judgment being entered, Sega is entitled to the maximum amount of statutory damages provided by law, $150,000 per work infringed pursuant to 17 U.S.C. § 504(c), or for any other such amount as may be proper pursuant to 17 U.S.C. § 504(c);
7) Sega is further entitled to recover its attorneys' fees and full costs for bringing this action pursuant to 17 U.S.C. § 505 and 15 U.S.C. § 1117(a); and
8) Award any and all other relief that this Court deems just and proper.

Dated this 5th day of October 2026.

Respectfully submitted,

/s/ Martin F. Trainor

Martin F. Trainor
Sydney Fenton
Alexander Whang
Victor B. Chahin
TME Law, P.C.
10 S. Riverside Plaza
Suite 875
Chicago, Illinois 60606
708.475.1127
martin@tme-law.com
sydney@tme-law.com
alexander@tme-law.com
victor@tme-law.com

Counsel for Plaintiffs Sega Corporation and Sega of America, Inc.