

DANIEL M. PETROCELLI (S.B. #097802)
dpetrocelli@omm.com
AMY R. LUCAS (S.B. #264034)
alucas@omm.com
MAYA ZAGAYER (S.B. #318080)
mzagayer@omm.com
O'MELVENY & MYERS LLP
1999 Avenue of the Stars, 8th Floor
Los Angeles, California 90067-6035
Telephone: +1 310 553 6700
Facsimile: +1 310 246 6779

Attorneys for Plaintiffs Ariana Grande-Butera
and GrandAri Inc.

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

**ARIANA GRANDE-BUTERA, p/k/a
ARIANA GRANDE**, an individual; and
GRANDARI, INC., a Florida
Corporation,

Plaintiffs,

v.

FOREVER 21, INC., a California
Corporation; **RILEY ROSE LLC**, a
California Company; and **DOES 1-10**,
inclusive,

Defendants.

Case No.

COMPLAINT FOR DAMAGES

1. VIOLATION OF CALIFORNIA
CIVIL CODE SECTION 3344
(CAL. CIV. CODE § 3344);
2. VIOLATION OF COMMON-
LAW RIGHT OF PUBLICITY;
3. FALSE ENDORSEMENT
UNDER THE LANHAM ACT
(15 U.S.C. § 1125(A));
4. TRADEMARK INFRINGEMENT
(15 U.S.C. § 1114(1)(A));
5. COMMON LAW TRADEMARK
INFRINGEMENT; AND
6. COPYRIGHT INFRINGEMENT
(17 U.S.C. § 501)

Unlimited Civil Case

DEMAND FOR JURY TRIAL

1 Plaintiffs Ariana Grande-Butera, p/k/a/ “Ariana Grande” and GrandAri Inc.
2 allege as follows:

3 **INTRODUCTION**

4 1. Ariana Grande is an internationally renowned singer, songwriter and
5 actress who, through years of hard work and dedication to her craft, has developed
6 a personal brand and global following unparalleled by any of her peers. Indeed,
7 Ms. Grande is one of the most successful artists in pop culture today, has the
8 largest social media following of *any* female celebrity in the world. Given her
9 stature and influence, Ms. Grande is highly sought after by companies hoping to
10 secure her endorsement of their products, and those companies are willing pay
11 enormous sums of money to engage Ms. Grande to help promote their brands.
12 Even a single social media post by Ms. Grande can garner fees of several hundred
13 thousand dollars, and her longer-term endorsement arrangements command fees in
14 the millions of dollars.

15 2. Hoping to benefit from Ms. Grande’s celebrity and influence, in or
16 around early 2019, Forever 21, Inc. (“Forever 21”) sought her endorsement of its
17 clothing and accessory products, which she explicitly declined due to Forever 21’s
18 unwillingness to pay the fair market value for a celebrity of Ms. Grande’s stature.
19 Fearing irrelevance in a rapidly evolving market with increasing competition from
20 other fast fashion brands, rather than pay Ms. Grande, Forever 21 and Riley Rose,
21 the beauty company started by the daughters of Forever 21’s founders
22 (collectively, “Defendants”), instead stole her name, likeness, and other intellectual
23 property to promote their brands for free.

24 3. Forever 21’s and Riley Rose’s unauthorized use of Ms. Grande’s
25 name, image, likeness, and music to promote their brands and products are blatant
26 and willful violations of her statutory and common law rights of publicity, and
27 constitute infringement of Plaintiffs’ copyrights and trademarks under the
28 Copyright Act and Lanham Act, respectively. By this action, Plaintiffs seek an

1 award of actual damages, the disgorgement of Forever 21's ill-gotten profits, and
2 an award of punitive damages to deter Forever 21 and Riley Rose from future
3 violations of Plaintiffs' personal and intellectual property rights.

4 **JURISDICTION AND VENUE**

5 4. The Court has original jurisdiction pursuant to 28 U.S.C. §§ 1331 and
6 1338(a). This is a civil action arising under federal law, the Lanham Act of 1946
7 as amended (codified at 15 U.S.C. §§ 1051, et seq.). The pendent state law claims
8 are so related to the federal claims that they form part of the same case or
9 controversy pursuant to Article III of the United States Constitution. The court
10 therefore has supplemental jurisdiction over those claims pursuant to 28 U.S.C.
11 § 1367(a).

12 5. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b)
13 for several independent reasons, including that: Defendants "reside" in this
14 judicial district for venue purposes under 28 U.S.C. § 1391(c)(2); a substantial part
15 of the events or omissions giving rise to the claims occurred in this district; and a
16 substantial part of property that is the subject of the action is situated in this
17 district.

18 **PARTIES**

19 6. Plaintiffs Ariana Grande-Butera is an individual and resident of Los
20 Angeles County, California.

21 7. Plaintiffs GrandAri Inc. is a Florida corporation with its principal place
22 of business in Los Angeles, California.

23 8. Plaintiffs are informed and believe, and based thereon allege, that
24 Defendant Forever 21 is a California corporation, with its principal place of
25 business in Los Angeles, California.

26 9. Plaintiffs are informed and believe, and based thereon allege, that
27 Defendant Riley Rose is a California-based limited liability company, with its
28 principal place of business in Los Angeles, California.

GENERAL ALLEGATIONS

I. Ms. Grande's Fame and Influence

10. Ariana Grande is one of the biggest stars in pop culture today. As a Grammy Award-winning singer, songwriter, and actor, Ms. Grande has not only performed at sold-out stadium tours all over the world, but her music and videos have amassed over 30 billion streams on platforms such as YouTube, Spotify, and Apple Music, making her the most listened-to female artist on the latter two.

11. Ms. Grande's career continues to defy norms and break records in the music industry. All five of Ms. Grande's full-length albums have been certified platinum by the Recording Industry Association of America ("RIAA"), and she is the first artist to have the lead singles from each studio album debut within the top ten in the United States.

12. Upon the release of her fifth album *Thank U, Next* in 2019, Ms. Grande again broke a string of records. The album's title track, *Thank U, Next*, debuted at number one on the US *Billboard* Hot 100, and held the record for the most-played song in a single day by a female artist on Spotify. The track was dethroned from the top spot by Ms. Grande's other singles, *7 Rings* and *Break Up with Your Girlfriend, I'm Bored*, making Ms. Grande the first female artist to replace herself at number one on the charts, and the first solo artist to simultaneously hold the top three spots on the *Billboard* Hot 100 chart.

13. Ms. Grande's fame, following, and social influence are equally unparalleled and record-breaking. As of February 2019, Ms. Grande became the most-followed woman on Instagram in the world, amassing more than 160 million Instagram followers; a title she continues to hold through the date of filing this Complaint. Ms. Grande has another 64 million followers on Twitter.

14. *TIME Magazine* named Ms. Grande one of "The 25 Most Influential People on the Internet" in 2019, and one of "The 100 Most Influential People in

1 the World” in both 2016 and 2019. *Billboard* recognized Ms. Grande as the
2 “Woman of the Year” in 2018 after she hosted the One Love Manchester benefit,
3 which helped raise \$29 million dollars for the victims of a suicide bombing attack
4 outside an arena in Manchester, England, where Ms. Grande had just finished
5 performing.

6 15. Ms. Grande’s success and star power have enabled her to expand her
7 career beyond the music industry through various commercial endorsement deals.
8 Still, Ms. Grande is selective of the brands with whom she chooses to partner, and
9 frequently turns down endorsement proposals. And when she does choose to
10 collaborate with a company or endorse its products or services, Ms. Grande often
11 works closely with third-parties to curate products and images that coincide with
12 her personal brand.

13 16. Ms. Grande’s control over the use of her name, image, likeness, and
14 intellectual property in promoting third-party products and services is critical to
15 safeguard her reputation, and to prevent the public from being misled into
16 believing that she has associated herself with a product or service that she does not,
17 in fact, endorse.

18 17. As alleged in further detail below, in complete disregard of Plaintiffs’
19 intellectual property rights and rights of publicity, Defendants have repeatedly and
20 willfully used Ms. Grande’s name, image, likeness, and music without
21 authorization to generate renewed interest in their brands and social media
22 platforms, and to elicit sales of their products.

23 **II. Forever 21’s Declining Success**

24 18. Plaintiffs are informed and believe, and based thereon allege, that
25 Forever 21 is a privately-owned clothing retailer with approximately 815 stores in
26 57 countries around the world. With over 30,000 employees, Forever 21 sells
27 clothing, shoes, handbags, and accessories, among other things, to mostly women
28 and girls ranging in age from 14 to 24.

19. Since being founded in 1984, Forever 21 has become a staple in nearly every shopping mall around the world by capitalizing on its then-revolutionary techniques of rapidly producing inexpensive clothing, making it one of the most well-known “fast fashion” brands in the world.

20. Indeed, Forever 21’s annual revenue totaled approximately \$3.4 billion in 2017. Recently, however, Forever 21 has faced competition from new online fast fashion companies which do not have the practical limitations and financial burdens that come with brick-and-mortar stores. As a result of Forever 21’s online competition, Defendant Forever 21 is reportedly experiencing a financial downturn and has been looking for ways to develop its business, including by expanding its brand into beauty products and cosmetics by launching the beauty boutique, Riley Rose in 2017.

21. Riley Rose founders Esther and Linda Chang, daughters of Forever 21 founder and CEO, Do Wan Chang, reportedly stated that “Forever 21 and Riley Rose have a similar customer base,” but that the goal when creating Riley Rose was to make something “very trendy and Instagram-worthy” as the ultimate “homage to millennials.”¹ The beauty boutique sells makeup, skincare, haircare and home décor through its website, www.rileyrose.com, and via 13 storefronts in shopping malls across the United States.

III. Defendants Resort to Unlawful Conduct as a Desperate Attempt to Stay Relevant and Profitable

22. Following the record-breaking release of Ms. Grande’s single *Thank U, Next* on or around November 3, 2018, and in anticipation of the album’s release in February 2019, Forever 21 contacted Ms. Grande’s representatives to discuss the possibility of having her endorse the fast fashion Forever 21 brand given that

¹ Mau, Dhani, *How New Beauty Store Riley Rose Was Designed to Be the Ultimate ‘Homage to Millennials,’* FASHIONISTA, Feb. 4, 2018, (last accessed Aug. 30, 2019 at <https://fashionista.com/2017/10/riley-rose-forever-21-beauty-store>).

1 Ms. Grande's fans are squarely within Forever 21's target market.

2 23. Notably, the endorsement deal Forever 21 sought with Ms. Grande
3 centered around social media marketing, including, but not limited to, Twitter
4 posts, Instagram posts, and Instagram stories.²

5 24. The importance and influence derived from social media marketing to
6 consumers in today's market cannot be overstated. Indeed, platforms such as
7 Instagram and Twitter are premier forms of marketing for most companies today,
8 and paying influential celebrities with large social media followings such as Ms.
9 Grande is the modern-day equivalent of buying television ads 20 years ago.

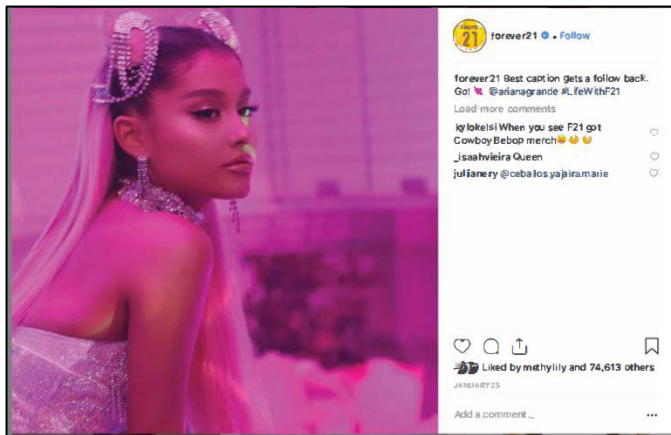
10 25. Given her stature, influence, and social media following, the market
11 value for even a single Instagram post by Ms. Grande is well into the six figures,
12 and she commands in the mid-seven figures to over eight figures for longer-term
13 endorsement deals, marketing campaigns, and/or licensing deals for use of her
14 name and likeness.

15 26. Negotiations between Forever 21 and Ms. Grande's representatives
16 took place in or around December 2018 and January 2019, but the proposed
17 endorsement deal never came to fruition because the amounts that Forever 21
18 offered to pay for the right to use Ms. Grande's name and likeness were
19 insufficient for an artist of her stature. Ms. Grande's representatives
20 communicated as much to Forever 21.

21 27. Rather than pay for that right as the law requires, Defendants simply
22 stole it by launching a misleading campaign across its website and social media
23 platforms primarily in January and February 2019. The campaign capitalized on
24 the concurrent success of Ms. Grande's album *Thank U, Next* by publishing at least
25 30 unauthorized images and videos misappropriating Ms. Grande's name, image,

26 ² An "Instagram story" is a picture and/or video, potentially set to music, posted
27 onto an Instagram account holder's page for up to 24 hours. Account holders can
28 also permanently archive Instagram stories by posting them onto their page as
"Highlights."

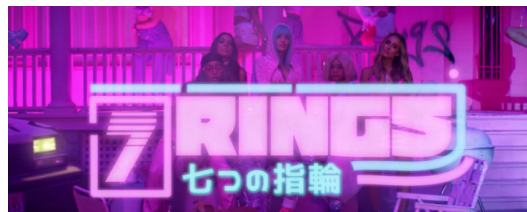
likeness, and music in order to create the false perception of her endorsement. A chart depicting Forever 21's and Riley Rose's unauthorized uses, and an explanation of why each is wrongful, is attached as **Exhibit 1**. Examples of the unauthorized posts depicting Ms. Grande published by Defendants Forever 21 and Riley Rose are included below, and a complete list is attached hereto as **Exhibit 2**:



28. As part of Defendants' unauthorized marketing campaign, Defendants also falsely suggested Ms. Grande's endorsement by hiring a look-alike model and posting photos of that model in clothing and accessories that resemble clothing worn in Ms. Grande's music videos and that the public immediately associates with Ms. Grande.³

29. Defendants did not simply use a model with a similar look and hairstyle; they used [1] a model who looks strikingly similar to Ms. Grande, [2] wearing a similar hairstyle to the one Ms. Grande wore in the *7 Rings* video, [3] dressed in a top designed to look like a top worn by Ms. Grande in numerous well-known photographs (including photographs of Ms. Grande that Forever 21 wrongfully posted on its Instagram feed, depicted above), [4] wearing a distinctive hair accessory worn by Ms. Grande in the *7 Rings* video and numerous well-known photographs, [5] using a pose that is virtually identical to the pose in which Ms. Grande was photographed, [6] in certain instances, with *7 Rings* audio played over the post, [7] in certain instances, with the distinctive "7" from the *7 Rings* video displayed in the background, [8] in certain instances intermixed with photographs of Ms. Grande herself (which photographs Forever 21 again had no authorization to post); and, [9] in certain instances, coupled with captions containing lyrics from Ms. Grande's song *7 Rings*.

30. Examples of Defendants' unauthorized posts depicting Ms. Grande's look-alike are included below, and attached hereto as **Exhibit 3**:



7 Rings logo from Ms. Grande's music video



Forever 21's look-alike model with identical "7" in the background

³ Videos of Defendants' alleged infringement of Ms. Grande's music and videos will be submitted to the Court separately.

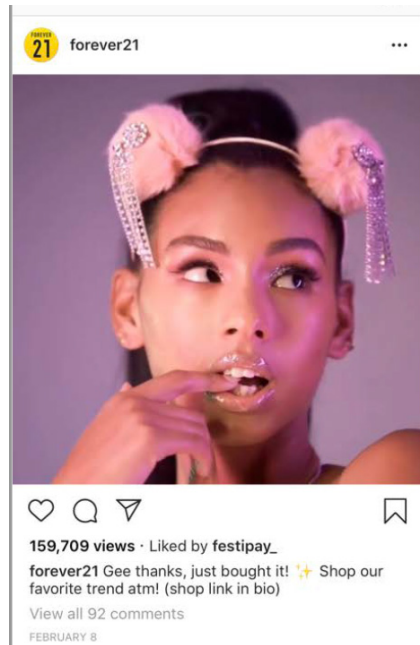


Image of Forever 21's
look-alike model with lyrics
from *7 Rings*



Images of Ms. Grande
from *7 Rings* video



Forever 21's look-alike model,
posted on Instagram



Image of Ms. Grande from *7 Rings* music video

1
2
3 31. The resemblance is uncanny and Forever 21's intent was clear: to
4 suggest to the viewing public that Ms. Grande endorsed Forever 21, its products,
5 and was affiliated with Forever 21.

6 32. When Ms. Grande discovered the infringement on or around February
7 23, 2019, she immediately contacted her attorneys and agents, including
8 representatives of Bravado International Group Merchandising Services, Inc.
9 ("Bravado"), her exclusive licensee for certain of her intellectual property in the
10 apparel industry. Shortly thereafter, Ms. Grande's representatives demanded that
11 Forever 21 take down all unauthorized uses of Ms. Grande's name, likeness, and
12 intellectual property.

13 33. Despite their stated agreement to do so, Defendants did not remove all
14 of the unauthorized content. Outside counsel for Ms. Grande contacted Forever 21
15 again on or around March 15, 2019 and on or around April 3, 2019 to demand that
16 that the unauthorized and infringing uses of Ms. Grande's name, image, likeness,
17 and music cease and desist immediately.

18 34. Defendants' infringing and unauthorized posts remained on Forever
19 21's and Riley Rose's social media accounts until at least April 17, 2019. As a
20 result, Defendants improperly misappropriated and profited from Ms. Grande's
21 influence and star-power for approximately 14 weeks.⁴
22
23
24
25
26

27 ⁴ Defendants began their use of Ms. Grande's name, image, likeness and music on
28 November 30, 2018, and failed to remove all unauthorized content until at least
April 17, 2019.

FIRST CLAIM FOR RELIEF

(Violation of Cal. Civ. Code § 3344 – Against All Defendants)

35. Ms. Grande incorporates all prior allegations of this Complaint by this reference.

36. Ms. Grande is the owner of the rights of publicity in her name, image, likeness, and persona necessary for endorsement deals.

37. Defendants have willfully and without authorization used Ms. Grande's name, image, likeness, and persona for commercial purposes, to advertise the Forever 21 and Riley Rose brands, and to promote the sale of clothing, accessories and beauty products on Forever 21's and Riley Rose's social media platforms and website.

38. Defendants' unauthorized use of Ms. Grande's name, image, likeness, and persona constitute a commercial misappropriation in violation of Section 3344 of the California Civil Code.

39. As a direct and proximate result of Defendants' wrongful conduct, Ms. Grande has suffered, and will continue to suffer, damages in an amount to be proven at trial, but in no event less than \$10 million.

40. Defendants have further been unjustly enriched by their misappropriation of Ms. Grande's statutory right of publicity. Accordingly, Ms. Grande is entitled to restitution of all income, profits, and other benefits resulting from Defendants' conduct, in an amount to be determined according to proof at trial.

41. Defendants' actions as alleged above were malicious, oppressive, and fraudulent, and done with the intent to injure Ms. Grande and with a willful and conscious disregard for Ms. Grande's rights. As a result, Ms. Grande is entitled to recover from Defendants punitive and exemplary damages in an amount sufficient to punish and deter them and others from engaging in such acts in the future.

SECOND CLAIM FOR RELIEF

(Violation of Common Law Right of Publicity – Against All Defendants)

42. Ms. Grande incorporates all prior allegations of this Complaint by this reference.

43. Ms. Grande is the owner of the common law rights of publicity in her name, image, likeness, and persona necessary for endorsement deals.

44. Defendants have willfully and without authorization used Ms. Grande's name, image, likeness, and persona for commercial purposes, to advertise the Forever 21 and Riley Rose brands, and to promote the sale of clothing, accessories, and beauty products on Defendants' social media platforms and websites.

45. The unauthorized use of Ms. Grande's likeness also includes at least 13 instances wherein Forever 21 falsely suggested Ms. Grande's endorsement by hiring a look-alike model and posting photos of that model in clothing and accessories that resemble clothing and accessories worn in Ms. Grande's music videos, and that the public immediately associates with Ms. Grande.

46. Defendants' unauthorized use of Ms. Grande's name, image, likeness, and persona constitutes a violation of California's common law right of publicity.

47. As a direct and proximate result of Defendants' wrongful conduct, Ms. Grande has suffered, and will continue to suffer, damages in an amount to be proven at trial, but in no event less than \$10 million.

48. Defendants have further been unjustly enriched by its infringement of Ms. Grande's common law right of publicity. Accordingly, Ms. Grande is entitled to restitution of all income, profits, and other benefits resulting from Forever 21's conduct, in an amount to be determined according to proof at trial.

49. Defendants' actions as alleged above were malicious, oppressive, and fraudulent, and done with the intent to injure Ms. Grande and with a willful and conscious disregard for Ms. Grande's rights. As a result, Ms. Grande is entitled to

1 recover from Defendants punitive and exemplary damages in an amount sufficient
2 to punish and deter Defendants and others from engaging in such acts in the future.

3 **THIRD CLAIM FOR RELIEF**

4 **(False Endorsement (15 U.S.C. § 1125(a)) – Against All Defendants)**

5 50. Ms. Grande incorporates all prior allegations of this Complaint by this
6 reference.

7 51. Ms. Grande is the owner of the statutory and common law rights
8 associated with Ms. Grande's name, image, likeness, and persona necessary for
9 endorsement deals, including her right to decide whether to associate her name,
10 image, likeness, or persona with any third-party for purposes relating to
11 sponsorship and/or endorsement.

12 52. Defendants' used distinctive attributes of Ms. Grande's persona,
13 including her name, image, and likeness without permission by posting onto
14 Defendants' website, www.forever21.com, and the Instagram accounts
15 @forever21 and @rileyrose, images of Ms. Grande and/or a look-alike model
16 dressed in clothing and accessories strikingly similar to the clothing and
17 accessories worn by Ms. Grande in her iconic *7 Rings* music video, and posed in
18 positions nearly identical to poses made by Ms. Grande in the *7 Rings* video, and
19 that the public readily associates with Ms. Grande.

20 53. Defendants' unauthorized uses constitute false or misleading
21 representations of fact to falsely imply the endorsement of Defendants' businesses
22 and products by Ms. Grande.

23 54. Defendants' unauthorized uses of Ms. Grande's persona are likely to
24 confuse and deceive consumers as to Ms. Grande's sponsorship and/or endorsement
25 of Forever 21's and Riley Rose's brands. Specifically, Defendants' use of Ms.
26 Grande's name, image, and likeness is likely to cause consumers to mistakenly
27 believe that Ms. Grande is associated with Forever 21 and Riley Rose, or that she
28 sponsors or endorses Defendants' products, websites, or social media accounts.

55. As a direct and proximate result of the acts of false endorsement set forth above, Ms. Grande has suffered actual damages in an amount to be proven at trial, but in no event less than \$10 million. Ms. Grande is entitled to the full range of relief available under the Lanham Act, 15 U.S.C. § 1117, including, without limitation, an award of actual damages and the disgorgement of Defendants' profits arising from their false or misleading acts. Defendants' conduct further renders this an "exceptional" case within the meaning of the Lanham Act, thus entitling Ms. Grande to an award of attorneys' fees and costs.

56. Ms. Grande is informed and believes, and based thereon alleges, that Defendants committed the unauthorized acts described above knowing that is likely to cause consumers to falsely believe that Ms. Grande endorses Defendants' brands and products. Defendants have thus willfully, knowingly, and maliciously deceived and confused the relevant consuming public, such that Ms. Grande is entitled to an award of treble damages.

FOURTH CLAIM FOR RELIEF

(Trademark Infringement (15 U.S.C. § 1114(1)) – Against All Defendants)

57. Plaintiffs incorporate all prior allegations of this Complaint by this reference.

58. Plaintiffs have extensively used the trademark ARIANA GRANDE in commerce in connection with a myriad of products and services, including Plaintiffs' advertising and promotion of Ms. Grande's fragrance line, as well as through endorsement of third-party products in the entertainment and fashion industries.

59. Plaintiffs own several federally registered trademarks in Ms. Grande's name, including without limitation: (1) U.S. Registration No. 4,965,758 for the use of ARIANA GRANDE in connection with "perfume" and "fragranced body care;" (2) Int'l Registration No. 1,477,022 for use of ARIANA GRANDE THANK U, NEXT in connection with "perfume" and "fragranced body care;" (3) U.S.

1 Registration No. 4,932,682 for the use of ARIANA GRANDE in connection with
2 clothing and apparel; (4) U.S. Registration No. 4,297,601 for the use of ARIANA
3 GRANDE in connection with “Entertainment services, namely, . . . musical
4 performances, musical videos, related film clips, photographs, and other
5 multimedia materials featuring Ariana Grande;” and (5) U.S. Serial No.
6 87,472,487 for the use of ARIANA GRANDE in connection with “the field of
7 music and entertainment,” “clothing,” handbags,” “jewelry accessories,” “licensing
8 of intellectual property,” and “entertainment services, namely, . . . music, film,
9 television, celebrity and popular culture provided over the internet,” (collectively,
10 the “Registered Marks”). True and correct copies of Plaintiffs’ Trademark
11 Certificates from the United States Patent and Trademark Office are attached
12 hereto as **Exhibit 4**.

13 60. The Registered Marks are valid trademarks owned by Plaintiffs.
14 Additionally, by virtue of Plaintiffs’ longstanding and continuous use of the
15 Registered Marks in commerce, Plaintiffs have acquired a valid common law
16 trademark in Ms. Grande’s name. The public has come to recognize the
17 Registered Marks as exclusively identifying Ms. Grande, and the marks are famous
18 worldwide.

19 61. Defendants infringed Plaintiffs’ registered and common law
20 trademarks by using these marks on their social media accounts, including the
21 Instagram accounts @forever21 and @rileyrose, to promote Defendants’ brands
22 and sale of clothing, accessories, and beauty products.

23 62. Defendants’ unauthorized use of Plaintiffs’ registered and common
24 law trademarks are likely to confuse and deceive consumers as to the origin,
25 sponsorship, and/or endorsement of the Forever 21 and Riley Rose brands and
26 products. Specifically, Defendants’ use of Ms. Grande’s name and Plaintiffs’ mark
27 are likely to cause consumers to mistakenly believe that Ms. Grande is associated
28 with Forever 21 and Riley Rose, or that she sponsors or endorses Defendants’

1 products, websites, or social media accounts.

2 63. As a direct and proximate result of the acts of trademark infringement
3 set forth above, Plaintiffs have suffered actual damages in an amount to be proven
4 at trial, but in no event less than \$10 million. Plaintiffs are entitled to the full range
5 of relief available under the Lanham Act, 15 U.S.C. § 1117, including, without
6 limitation, an award of actual damages and the disgorgement of Defendants' profits
7 arising from the acts of trademark infringement. Defendants' conduct further
8 renders this an "exceptional" case within the meaning of the Lanham Act, thus
9 entitling Plaintiffs to an award of attorneys' fees and costs.

10 64. Plaintiffs are informed and believe, and based thereon allege, that
11 Defendants committed the infringement described above knowing that its
12 unauthorized use of the ARIANA GRANDE and ARIANA GRANDE THANK U,
13 NEXT trademarks is likely to cause consumer confusion. Defendants have thus
14 willfully, knowingly, and maliciously deceived and confused the relevant
15 consuming public, such that Plaintiffs are entitled to an award of treble damages.

16 **FIFTH CLAIM FOR RELIEF**

17 **(Common Law Trademark Infringement – Against All Defendants)**

18 65. Plaintiffs incorporate all prior allegations of this Complaint by this
19 reference.

20 66. Plaintiffs own valid common law trademarks in ARIANA GRANDE
21 and ARIANA GRANDE THANK U, NEXT for use in connection with a wide
22 variety of products and services, including without limitation the promotion of
23 products and services in the entertainment, fashion, and beauty industries. The
24 Registered Trademarks are likewise valid trademarks owned by Plaintiffs.

25 67. The public has come to recognize the ARIANA GRANDE and
26 ARIANA GRANDE THANK U, NEXT marks as exclusively identifying Ms.
27 Grande, and the marks are famous worldwide.

28 68. Defendants have infringed Plaintiffs' trademarks by using these marks

1 on their social media platforms, including the Instagram accounts @forever21 and
2 @rileyrose, to promote Defendants' brands and products.

3 69. Defendants' unauthorized use of Plaintiffs' trademarks is likely to
4 confuse and deceive consumers as to the origin, sponsorship, and/or endorsement of
5 the Forever 21 and Riley Rose brands, websites, social media accounts, and
6 products. Specifically, Defendants' use of Plaintiffs' marks is likely to cause
7 consumers to mistakenly believe that Ms. Grande is associated with Forever 21
8 and/or Riley Rose, or that she sponsors or endorses Defendants' products.

9 70. As a direct and proximate result of the acts of trademark infringement
10 set forth above, Plaintiffs have suffered actual damages in an amount to be proven
11 at trial, but in no event less than \$10 million.

12 71. Plaintiffs are informed and believe, and based thereon allege, that
13 Defendants committed the infringement described above knowing that its
14 unauthorized use of the ARIANA GRANDE and ARIANA GRANDE THANK U,
15 NEXT marks is likely to cause consumer confusion. Defendants have thus
16 willfully, knowingly, and maliciously deceived and confused the relevant
17 consuming public, such that Plaintiffs are entitled to an award of treble damages.

18 72. Plaintiffs are further informed and believe, and based thereon allege,
19 that Defendants acted with fraud, oppression, or malice in infringing Plaintiffs'
20 marks as alleged above. As such, in addition to the other relief sought herein,
21 Plaintiffs are entitled to an award of punitive damages.

22 **SIXTH CLAIM FOR RELIEF**

23 **(Copyright Infringement – Against All Defendants)**

24 73. In addition to the wrongful use of Ms. Grande's right of publicity and
25 Plaintiffs' trademarks, Forever 21 and Riley Rose simultaneously infringed Ms.
26 Grande's copyrights by publishing images, lyrics, and audiovisual clips from Ms.
27 Grande's copyrighted songs: (1) *7 Rings*; (2) *Thank U, Next*; and (3) *Break Up With*
28 *Your Girlfriend, I'm Bored*.

74. Ms. Grande holds either the federally registered copyright or the beneficial interest and approval rights for each of the three songs infringed by Forever 21 and/or Riley Rose, including without limitation: (1) U.S. Registration No. PA0002154953 for the audio clip of song *Thank U, Next*; (2) U.S. Registration No. PA0002164214 for the audiovisual clip of *Thank U, Next*; (3) U.S. Registration No. PA0002191175 for the audio clip of song *7 Rings*; (4) U.S. Registration No. PA0002177521 for the audiovisual clip of *7 Rings*; and (5) U.S. Registration No. PA0002182759 for the audiovisual clip of *Break Up With Your Girlfriend, I'm Bored*, (collectively the "Copyrighted Works"). True and correct copies of Ms. Grande's Copyright Certificates from the United States Copyright Office are attached hereto as **Exhibit 5**.

75. Defendants unlawfully copied the Copyrighted Works by publishing (1) audio clips from Ms. Grande's song *7 Rings*; (2) audiovisual clips from her music videos for both *7 Rings* and *Thank U, Next*; and (3) song lyrics from Ms. Grande's songs *7 Rings*, *Thank U, Next*, and *Break Up With Your Girlfriend, I'm Bored*.

76. As a direct and proximate result of the acts of copyright infringement set forth above, Ms. Grande has suffered actual damages in an amount to be proven at trial, but in no event less than \$600,000 dollars. Ms. Grande is entitled to the full range of relief available under the Copyright Act, U.S.C. § 504(a)(1), (b), including, without limitation, an award of actual damages and the disgorgement of Defendants' profits arising from the acts of copyright infringement. Defendants' conduct entitles Ms. Grande to an award of attorneys' fees and costs. 17 U.S.C. § 505.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment as follows:

1. On all claims for relief, for an award of compensatory and treble damages in an amount to be proven, but in no event less than \$10 million;

1 2. On all claims for relief, for the disgorgement of Forever 21's and Riley
2 Rose's profits attributable to the infringement of Plaintiffs' intellectual property
3 rights and rights of publicity;

4 3. On the First and Second Claims for Relief, for an award of punitive
5 damages in an amount sufficient to deter unlawful conduct by Forever 21 and Riley
6 Rose in the future;

7 4. For a permanent injunction restraining and enjoining Defendants from
8 using Ms. Grande's name, images, likeness, persona, copyrights and Plaintiffs'
9 trademarks;

10 5. For pre-judgment and post-judgment interest according to proof and to
11 the maximum extent allowed by law;

12 6. For attorneys' fees and costs; and

13 7. For such other and further relief as the Court may deem just and
14 proper.

15
16 DATED: September 2, 2019

O'MELVENY & MYERS LLP

17
18 By: /s/ Daniel M. Petrocelli
19 Daniel M. Petrocelli
20 Attorney for Plaintiffs Ariana
21 Grande-Butera and GrandAri Inc.
22
23
24
25
26
27
28

DEMAND FOR JURY TRIAL

Pursuant to Local Rule 38-1, Plaintiffs hereby demand a trial by jury on all issues so triable.


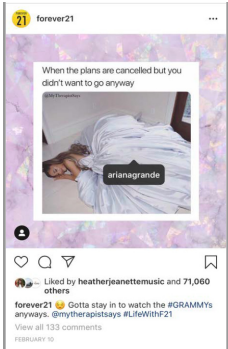


DATED: September 2, 2019

O'MELVENY & MYERS LLP


By: /s/ Daniel M. Petrocelli
Daniel M. Petrocelli
Attorney for Plaintiffs Ariana
Grande-Butera and GrandAri Inc.

EXHIBIT 1

EXHIBIT A

No.	Photo Description/PHOTO TITLE /CAPTION	IMAGE	LOCATION	TYPE OF WRONGFUL USE
1	Forever Female collage	 <p>Posted on 02/21/19, 9:20am</p>	Instagram	<ul style="list-style-type: none"> contains lyrics from "break up with your girlfriend, i'm bored"
2	When the plans are cancelled but you didn't want to go anyway MEME	 <p>forever21</p> <p>When the plans are cancelled but you didn't want to go anyway</p> <p>arianagrande</p> <p>Liked by heatherjeanettemusic and 71,060 others</p> <p>forever21 📸 Gotta stay in to watch the #GRAMMYS anyway. @mytherapistays #LifeWithF21</p> <p>View all 133 comments</p> <p>FEBRUARY 10</p>	Instagram	<ul style="list-style-type: none"> depicts Ariana Grande contains Ariana Grande Trademark
3	Photo of Ariana Grande; Caption: Alright bb's, drop your fave song off ariana's new album below! @sarashakeel #LifewithF21	 <p>Posted on 02/10/19, 6:01pm</p>	Instagram	<ul style="list-style-type: none"> depicts Ariana Grande contains "Ariana" Trademark in caption
4	Model with puffy ears holding hair	 <p>Posted on 02/07/18, 6:53am</p>	Instagram	<ul style="list-style-type: none"> depicts look-alike model




No.	Photo Description/PHOTO TITLE /CAPTION	IMAGE	LOCATION	TYPE OF WRONGFUL USE
5	Buy matching diamonds for 6 of my ... Follow our stories later today as we pick out some of our favorite looks from this iconic video @victoriamonet #LifeWithF21	 Posted on 02/05/19, 9:27am	Instagram	<ul style="list-style-type: none"> · depicts Ariana Grande · contains lyrics from "7 Rings" · depicts copyrighted image from "7 Rings" music video
6	Best Caption gets a follow back. Go! @arianagrande #LifeWithF21	 Posted on 01/25/19, 8:00am	Instagram	<ul style="list-style-type: none"> · depicts Ariana Grande · contains Ariana Grande Trademark · depicts copyrighted image from "7 Rings" music video
7	I see It, I Like It, I want it, I check the Price, I put it back/ Caption: I feel attacked @squaresayings #LifeWithF21	 Posted on 02/09/19, 12:49pm	Instagram	<ul style="list-style-type: none"> · image contains lyrics from "7 Rings"
8	Caption: How you & your girls gather around a phone after takin a group pic. @arianagrande #LifeWithF21	 Posted on 01/16/19, 2:00pm	Instagram	<ul style="list-style-type: none"> · depicts Ariana Grande · contains Ariana Grande Trademark · depicts copyrighted image from "7 Rings" music video
9	Caption: Friday function vibe, Tag your squad @arianagrande #LifeWith21	 Posted on 11/20/18, 9:01am	Instagram	<ul style="list-style-type: none"> · depicts Ariana Grande · contains Ariana Grande Trademark · depicts copyrighted image from "thank u, next" music video

No.	Photo Description/PHOTO TITLE /CAPTION	IMAGE	LOCATION	TYPE OF WRONGFUL USE
10	Caption: Gee thanks, just bought it! Shop our favorite trend atm ! (shop link in bio)	 Posted on 02/08/19, 10:46am	Instagram	<ul style="list-style-type: none"> · depicts look-alike model · caption contains lyrics from "7 Rings"
11	Video clip of "thank u, next." Caption: thank you, next szn #LifeWithF21	 Posted on 11/30/18, 6:51pm	Instagram	<ul style="list-style-type: none"> · depicts Ariana Grande · depicts copyrighted video clip of "thank u, next" music video · caption contains lyrics from "thank u, next" · contains Thank U, Next Trademark
12	Video clip with meme stating: Bank account: -107, also me: /Caption I want it, I got it! #LifeWith F21	 Posted on 01/22/19, 7:43pm	Instagram	<ul style="list-style-type: none"> · depicts Ariana Grande · video clip of "7 Rings" · caption contains lyrics from "7 Rings" · depicts copyrighted image from "7 Rings" music video
13	You Want it, we got it. We're all about the bright neons + bright metallics. Shop this trend now.		Instagram	<ul style="list-style-type: none"> · depicts look-alike model
14	Girls Night Out Anyone	 Posted on 02/07/19, 4:32pm	Instagram	<ul style="list-style-type: none"> · depicts Ariana Grande · depicts copyrighted image from "7 Rings" music video

No.	Photo Description/PHOTO TITLE /CAPTION	IMAGE	LOCATION	TYPE OF WRONGFUL USE
15	Tag your squad for the night		Instagram	<ul style="list-style-type: none"> · depicts Ariana Grande · depicts copyrighted image from "7 Rings" music video
16	Photos of Ariana Grande		Instagram	<ul style="list-style-type: none"> · depicts Ariana Grande
17	Swipe Up to Shop		Instagram	<ul style="list-style-type: none"> · depicts look-alike model
18	Swipe Up to Shop		Instagram	<ul style="list-style-type: none"> · depicts look-alike model

No.	Photo Description/PHOTO TITLE /CAPTION	IMAGE	LOCATION	TYPE OF WRONGFUL USE
19	Model photo		Instagram	· depicts look-alike model
20	Swipe up to Shop /Model Photo			· depicts look-alike model
21	Model photo		Instagram	· depicts look-alike model

No.	Photo Description/PHOTO TITLE /CAPTION	IMAGE	LOCATION	TYPE OF WRONGFUL USE
22	Swipe Up to Shop		Instagram	· depicts look-alike model
23	to Shop the trend		Instagram	· depicts look-alike model
24	Promo in the Bag		Forever 21.com (Desktop and Mobile)	· depicts look-alike model
25	Promo in the Bag		Forever 21 App	· depicts look-alike model

No.	Photo Description/PHOTO TITLE /CAPTION	IMAGE	LOCATION	TYPE OF WRONGFUL USE
26	Promo in the Bag		Email Distribution	· depicts look-alike model
27	Ariana Grande's image		Riley Rose Instagram	· depicts Ariana Grande · depicts copyrighted image from "7 Rings" music video
28	Ariana Grande's image as meme/bank account: \$107 /also me:		Riley Rose Instagram	· depicts Ariana Grande · depicts copyrighted image from "7 Rings" music video

No.	Photo Description/PHOTO TITLE /CAPTION	IMAGE	LOCATION	TYPE OF WRONGFUL USE
29	Caption: How you & your girls gather around a phone after takin a group pic. @arianagrande #LifeWithF21		Riley Rose Instagram	<ul style="list-style-type: none"> · depicts Ariana Grande · contains Ariana Grande Trademark · depicts copyrighted image from "7 Rings" music video
30	thank you, next szn		Riley Rose Instagram	<ul style="list-style-type: none"> · depicts Ariana Grande · depicts copyrighted video clip of "thank u, next" · caption contains lyrics from "thank u, next" · contains Thank U, Next Trademark

EXHIBIT 2

Trending Tuesday.



AS SOON AS THE CLOCK STRIKES MIDNIGHT ON DECEMBER 1



forever21 • Follow

forever21 thank u, next szn 🍷 🌲
#LifeWithF21

Load more comments

jajjanajm @jxsefab

andriacristiny1 @ingrid.caroline25
@layslins

ineddedthisusername me when the
clock strikes midnight on November 1
avacadosfrommexico lol no mean girls is
better



704,134 views

NOVEMBER 30, 2018

Add a comment...



forever21 • Follow


forever21 Friday function vibe 🍷 Tag your squad 💕 @arianagrande #LifeWithF21

Load more comments

its_ellena_stokman Lucky my squad are OriGinal..not copycat. ❤️

iamtiinnaa What's the name of the app (theme of the pic) ❤️

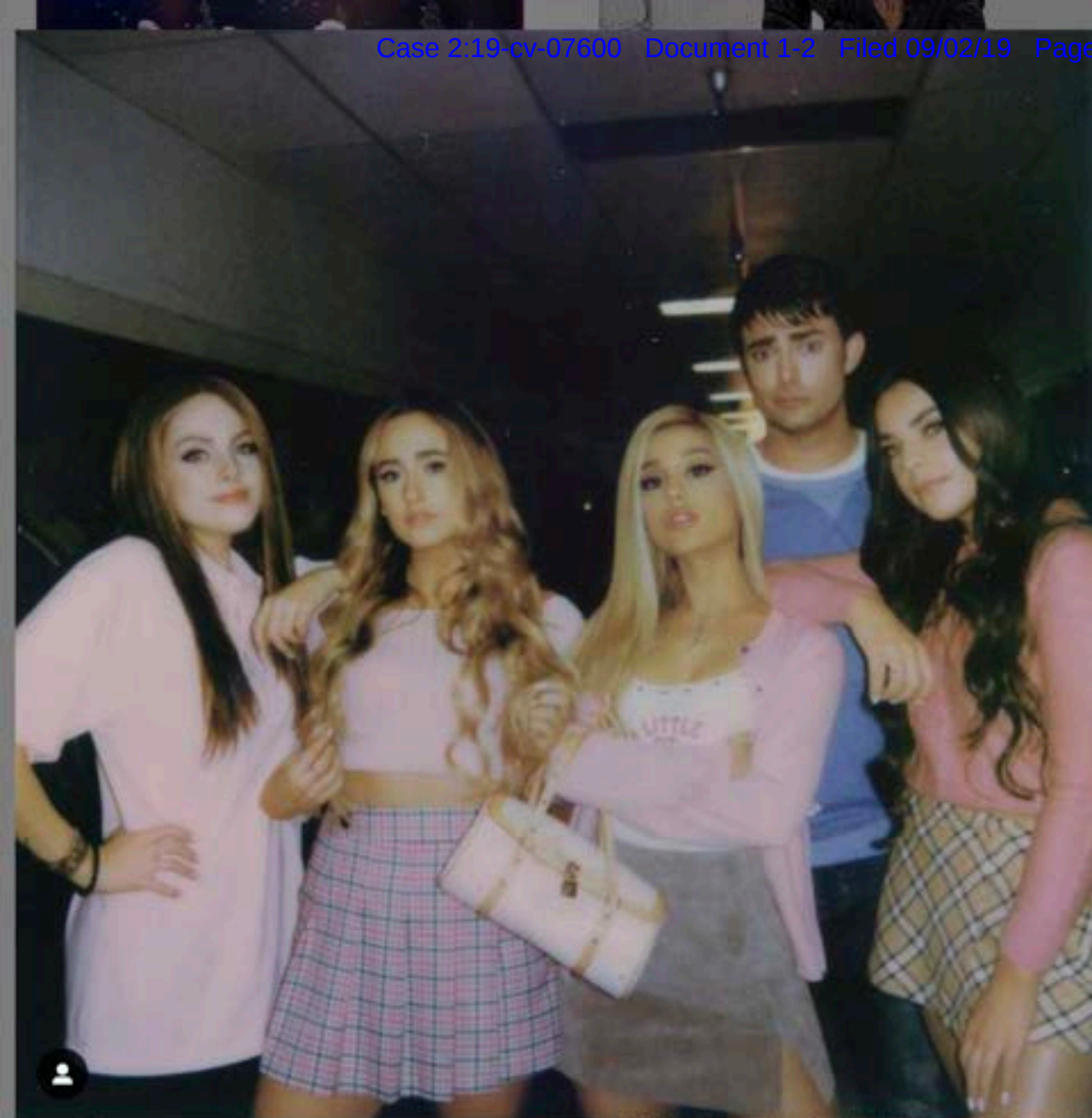


 Liked by yenirevs and 136,844 others

NOVEMBER 30, 2018

Add a comment...

34





forever21 • Follow

forever21 How you & your girls gather around a phone after taking a group pic. 📸
💖 @arianagrande #LifeWithF21

Load more comments

pablojvpz @ketodanext ❤️ 🤔

meliesingss Yep so meeeeeee 🍷 🍷 🍷



👤 Liked by cre8cg and 32,076 others

JANUARY 16

Add a comment...

35





forever21 • Follow

forever21 Best caption gets a follow back.
Go! 🍷 @arianagrande #LifeWithF21

Load more comments

kylokelsi When you see F21 got
Cowboy Bebop merch 🤔 🤔 🤔

_isaahvieira Queen

julianery @ceballos.yajaira.marie



Liked by methylily and 74,613 others

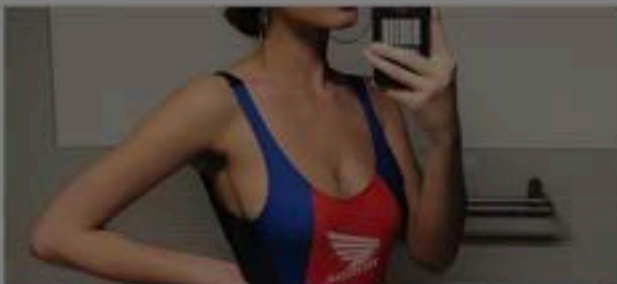
JANUARY 25

Add a comment...

36



Search



forever21 • Follow

forever21 🎵 Buy matching diamonds for 6 of my... 💎 Follow our stories later today as we pick out some of our favorite looks from this iconic video 📺 ✨ @victoriamonet #LifeWithF21

Load more comments

misslady_purple @berta.s te pareces a la de rosa 🍷

berta.s @misslady_purple jajajajajaja me encanta su look 🍷 💎

ohsweetbones 💎



Liked by yenirevs and 67,803 others

FEBRUARY 5

Add a comment...

37 ...

4:31

LTE



Photo



forever21



Liked by **yenirevs** and **71,738** others

forever21 Girl's night out, anyone? 🍷 💋
[@arianagrande](#) [#LifeWithF21](#)

[View all 94 comments](#)

FEBRUARY 7



4:33

LTE



Photo



forever21



When the plans are cancelled but you didn't want to go anyway

@MyTherapistSays



arianagrande



Liked by heatherjeanettemusic and 71,060 others

forever21 🙄 Gotta stay in to watch the #GRAMMYs anyways. @mytherapistsays #LifeWithF21

View all 133 comments

FEBRUARY 10



4:33

LTE



forever21



Liked by methylily and 114,551 others

forever21 Alright bb's, drop your fave song off ariana's new album below! 💕👉 @sarashakeel #LifeWithF21

View all 900 comments

FEBRUARY 10

4:31

LTE



Photo



forever21



Liked by **yenirevs** and **97,484** others

forever21 Tag your squad for the night. 💖
[@arianagrande](#) [#LifeWithF21](#)

[View all 313 comments](#)

22 HOURS AGO





forever21 • Follow

AS SOON AS THE CLOCK STRIKES MIDNIGHT ON DECEMBER 1



forever21 thank u, next szn 🍷 🌲
#LifeWithF21

Load more comments

jajjanajm @jxsefab



andriacristiny1 @ingrid.caroline25
@layslins



ineddedthisusername me when the
clock strikes midnight on November 1
avacadosfrommexico lol no mean girls is
better



704,134 views

NOVEMBER 30, 2018

Add a comment...

bank account: -\$107

also me:



bank account: -\$107
also me:



forever21

forever21 i want it, i g
#LifeWithF21

Load more comments

dionnevosx @suzang

suzangruithuijzen @c

milyrodriguez @prisc



priscillakopper @mily



875,854 views

JANUARY 22

Add a comment...

Click to go to fullscreen, ctrl+click to snap to video size

bank account: -\$107
also me:



forever21 • Follow

forever21 i want it, i got it!
#LifeWithF21

Load more comments

dionnevosx @suzangruihu

suzangruihuizen @dionne

milyrodriguez @priscillakop



priscillakopper @milyrodrig



875,854 views

JANUARY 22

Add a comment...

EXHIBIT 3



swipe up to shop



swipe up to shop





swipe up to shop



4:32

LTE



Video



forever21



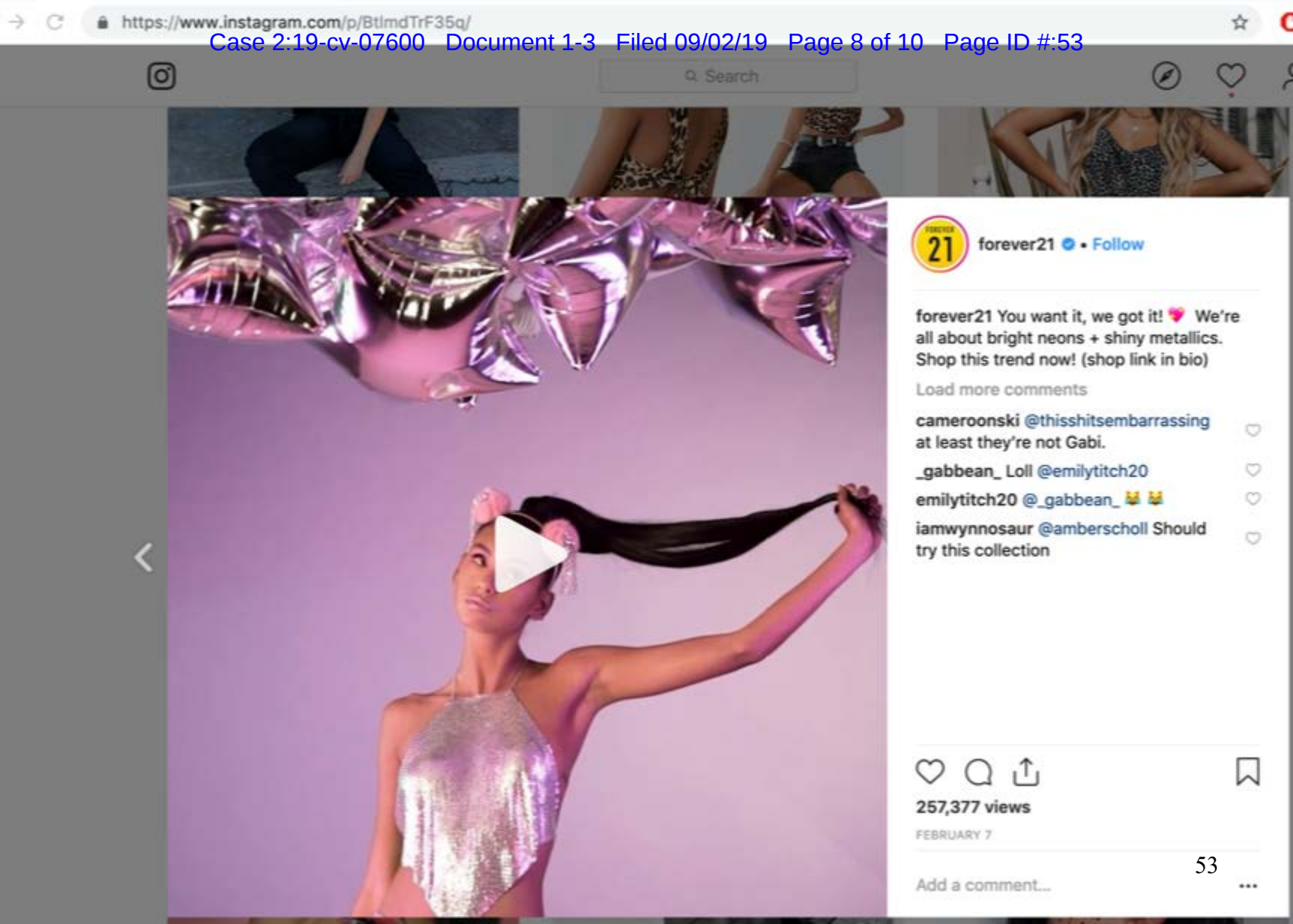
257,356 views · Liked by festipay_ and freddy_dez_02

forever21 You want it, we got it! 💖 We're all about bright neons + shiny metallics. Shop this trend now! (shop link in bio)

[View all 159 comments](#)

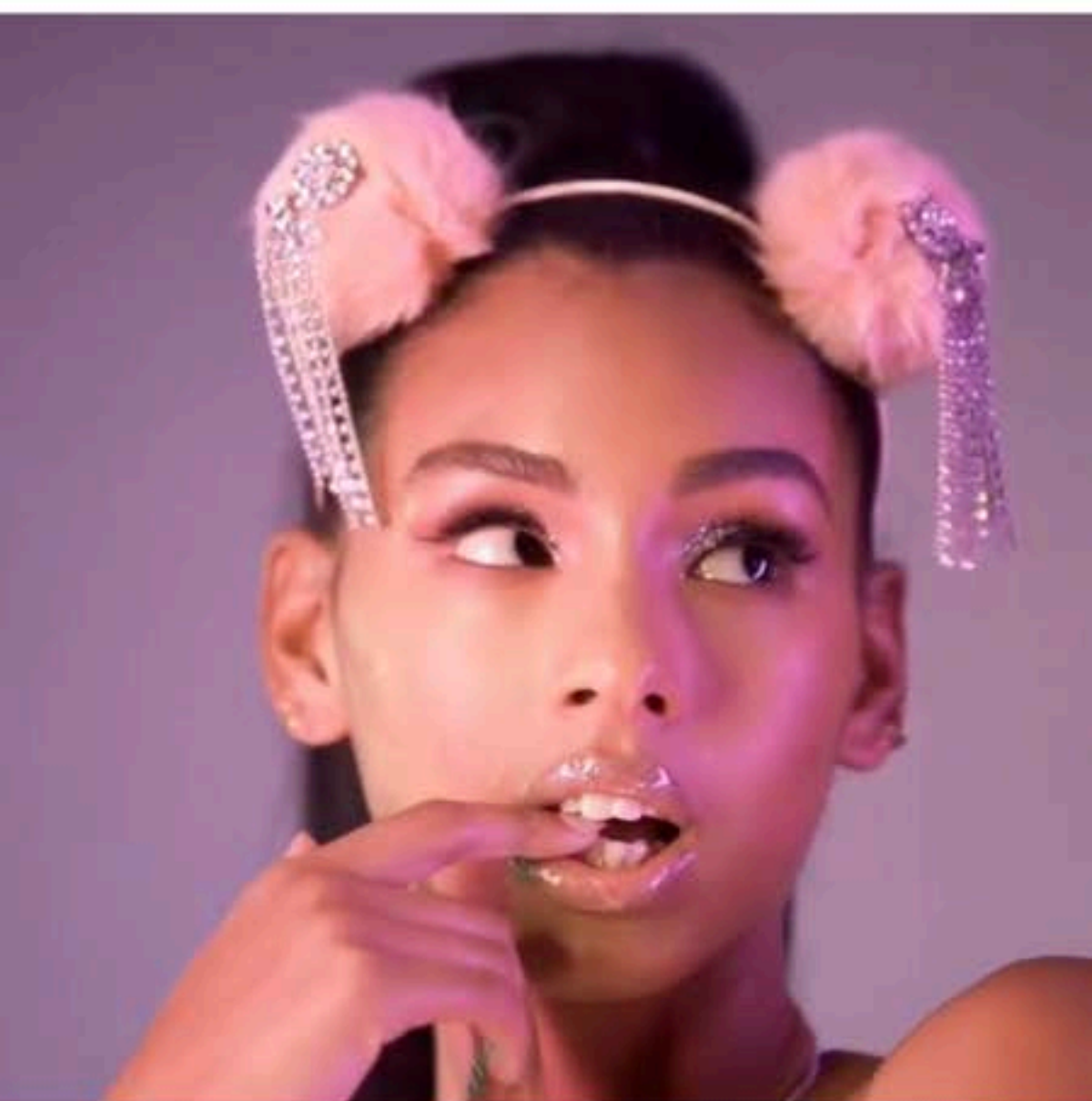
FEBRUARY 7





 forever21

...





...

159,709 views · Liked by **festipay_**

forever21 Gee thanks, just bought it! ✨ Shop our favorite trend atm! (shop link in bio)

[View all 92 comments](#)

FEBRUARY 8



IN THE BAG

Shop bright neon and shiny metallics.

SHOP HEADER
2/11



EXHIBIT 4

United States of America

United States Patent and Trademark Office

ARIANA GRANDE

Reg. No. 4,965,758

Registered May 24, 2016

Int. Cl.: 3

TRADEMARK

PRINCIPAL REGISTER

GRANDARI, INC. (DELAWARE CORPORATION)
1453 3RD STREET PROMENADE, SUITE 310
C/O STUBBS ALDERTON & MARKILES, LLP
SANTA MONICA, CA 90401

FOR: PERFUME; EAU DE PARFUM; FRAGRANCED BODY CARE PREPARATIONS, NAMELY, BODY LOTIONS, BODY SCRUBS , IN CLASS 3 (U.S. CLS. 1, 4, 6, 50, 51 AND 52).

FIRST USE 9-16-2015; IN COMMERCE 9-16-2015.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

OWNER OF U.S. REG. NO. 4,297,601.

THE NAME(S), PORTRAIT(S), AND/OR SIGNATURE(S) SHOWN IN THE MARK IDENTIFIES ARIANA GRANDE-BUTERA, WHOSE CONSENT(S) TO REGISTER IS MADE OF RECORD.

SN 86-526,605, FILED 2-6-2015.

REBECCA SMITH, EXAMINING ATTORNEY



Michelle K. Lee

Director of the United States
Patent and Trademark Office

**REQUIREMENTS TO MAINTAIN YOUR FEDERAL
TRADEMARK REGISTRATION**

**WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE
DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.**

Requirements in the First Ten Years*

What and When to File:

First Filing Deadline: You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. *See* 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.

Second Filing Deadline: You must file a Declaration of Use (or Excusable Nonuse) **and** an Application for Renewal between the 9th and 10th years after the registration date.*
See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*

What and When to File:

You must file a Declaration of Use (or Excusable Nonuse) **and** an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the United States Patent and Trademark Office (USPTO). The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. *See* 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. *See* 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at <http://www.uspto.gov>.

NOTE: A courtesy e-mail reminder of USPTO maintenance filing deadlines will be sent to trademark owners/holders who authorize e-mail communication and maintain a current e-mail address with the USPTO. To ensure that e-mail is authorized and your address is current, please use the Trademark Electronic Application System (TEAS) Correspondence Address and Change of Owner Address Forms available at <http://www.uspto.gov>.

United States of America

United States Patent and Trademark Office

ARIANA GRANDE

Reg. No. 4,932,682

Registered Apr. 5, 2016

Int. Cl.: 25

TRADEMARK

PRINCIPAL REGISTER

GRANDARI, INC. (FLORIDA CORPORATION)
C/O STUBBS ALDERTON & MARKILES, LLP
1453 3RD STREET PROMENADE, SUITE 310
SANTA MONICA, CA 90401

FOR: CLOTHING, NAMELY, T-SHIRTS, SHIRTS, SWEATSHIRTS, TANK TOPS, SHORTS, HOODED SWEATSHIRTS, WRISTBANDS; HEADWEAR, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 8-0-2013; IN COMMERCE 8-0-2013.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

THE NAME(S), PORTRAIT(S), AND/OR SIGNATURE(S) SHOWN IN THE MARK IDENTIFIES "ARIANA GRANDE"-BUTERA, WHOSE CONSENT(S) TO REGISTER IS MADE OF RECORD.

SN 85-625,398, FILED 5-15-2012.

CHARLOTTE CORWIN, EXAMINING ATTORNEY



Michelle K. Lee

Director of the United States
Patent and Trademark Office

**REQUIREMENTS TO MAINTAIN YOUR FEDERAL
TRADEMARK REGISTRATION**

**WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE
DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.**

Requirements in the First Ten Years*

What and When to File:

First Filing Deadline: You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. *See* 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.

Second Filing Deadline: You must file a Declaration of Use (or Excusable Nonuse) **and** an Application for Renewal between the 9th and 10th years after the registration date.*
See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*

What and When to File:

You must file a Declaration of Use (or Excusable Nonuse) **and** an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the United States Patent and Trademark Office (USPTO). The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. *See* 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. *See* 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at <http://www.uspto.gov>.

NOTE: A courtesy e-mail reminder of USPTO maintenance filing deadlines will be sent to trademark owners/holders who authorize e-mail communication and maintain a current e-mail address with the USPTO. To ensure that e-mail is authorized and your address is current, please use the Trademark Electronic Application System (TEAS) Correspondence Address and Change of Owner Address Forms available at <http://www.uspto.gov>.

United States of America

United States Patent and Trademark Office

ARIANA GRANDE

Reg. No. 4,297,601

Registered Mar. 5, 2013

Int. Cl.: 41

SERVICE MARK

PRINCIPAL REGISTER

GRANDARI, INC. (FLORIDA CORPORATION)
9720 WILSHIRE BLVD., FIFTH FLOOR
C/O RAINES FELDMAN LLP
BEVERLY HILLS, CA 90212

FOR: ENTERTAINMENT SERVICES, NAMELY, PROVIDING A WEBSITE FEATURING NON-DOWNLOADABLE MUSICAL PERFORMANCES, MUSICAL VIDEOS, RELATED FILM CLIPS, PHOTOGRAPHS, AND OTHER MULTIMEDIA MATERIALS FEATURING ARIANA GRANDE; ENTERTAINMENT IN THE NATURE OF LIVE MUSICAL PERFORMANCES, DRAMATIC PERFORMANCES AND COMEDIC PERFORMANCES, IN CLASS 41 (U.S. CLS. 100, 101 AND 107).

FIRST USE 7-10-2008; IN COMMERCE 7-10-2008.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

THE NAME(S), PORTRAIT(S), AND/OR SIGNATURE(S) SHOWN IN THE MARK IDENTIFIES "ARIANA GRANDE"-BUTERA, WHOSE CONSENT(S) TO REGISTER IS MADE OF RECORD.

SER. NO. 85-625,385, FILED 5-15-2012.

ERNEST SHOSHO, EXAMINING ATTORNEY



Lisa Street Liu

Acting Director of the United States Patent and Trademark Office

**REQUIREMENTS TO MAINTAIN YOUR FEDERAL
TRADEMARK REGISTRATION**

**WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE
DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.**

Requirements in the First Ten Years*
What and When to File:

First Filing Deadline: You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. *See* 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.

Second Filing Deadline: You must file a Declaration of Use (or Excusable Nonuse) **and** an Application for Renewal between the 9th and 10th years after the registration date.*
See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*
What and When to File:

You must file a Declaration of Use (or Excusable Nonuse) **and** an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

The United States Patent and Trademark Office (USPTO) will NOT send you any future notice or reminder of these filing requirements.

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the USPTO. The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. *See* 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. *See* 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at <http://www.uspto.gov>.



UNITED STATES PATENT AND TRADEMARK OFFICE (USPTO)

Commissioner for Trademarks
www.uspto.gov

OFFICIAL USPTO NOTICE OF PUBLICATION UNDER 12(a)

U.S. Application Serial No. 88368432
Mark: ARIANA GRANDE THANK U, NEXT
International Class(es): 003
Owner: GrandAri, Inc.
Docket/Reference No. TM-11383

Issue Date: July 3, 2019

Your mark is scheduled to publish in the *Trademark Official Gazette (TMOG)* on July 23, 2019.

Your mark appears to be entitled to register on the Principal Register upon the acceptance of a statement of use, subject to any claims of concurrent use.

What happens when your mark publishes. Within 30 days of the publication date, any party who believes it will be damaged by the registration of the mark may file a notice of opposition (or extension of time) with the Trademark Trial and Appeal Board. If no objection is filed, we will issue a Notice of allowance.

View your mark in the TMOG after the publication date at <https://tmog.uspto.gov/> by selecting your publication date in the "issues" field, entering your serial number in the "search by" field, and clicking on the magnifying glass.

Ensure that the information in the TMOG is correct. If any information is incorrect, promptly request correction using the "Post-Approval/Publication/Post-Notice of Allowance (NOA) Amendment" form at <https://teas.uspto.gov/office/ppa/>. For more information, see <https://www.uspto.gov/trademark/trademark-updates-and-announcements/procedures-submitting-amendmentscorrections-trademark>.

Direct questions about this notice to the Trademark Assistance Center (TAC) at 1-800-786-9199 (select option 1) or TrademarkAssistanceCenter@uspto.gov.

Email Address(es):

rshapiro@sasiplaw.com

Under the Paperwork Reduction Act of 1995 no persons are required to respond to a collection of information unless it displays a valid OMB control number.

PTO Form 1478 (Rev 09/2006)

OMB No. 0651-0009 (Exp 02/28/2018)

Trademark/Service Mark Application, Principal Register

Serial Number: 87472487

Filing Date: 06/01/2017

To the Commissioner for Trademarks:

MARK: ARIANA GRANDE (Standard Characters, see [mark](#))

The literal element of the mark consists of ARIANA GRANDE.

The mark consists of standard characters, without claim to any particular font style, size, or color.

The applicant, GrandAri, Inc., a corporation of Delaware, having an address of
c/o 7190 Sunset Blvd Suite 116
Los Angeles, California 90046
United States

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

International Class 014: JEWELRY, JEWELRY CASES, JEWELRY ACCESSORIES, CLOCKS, WATCHES, CHRONOGRAPHS AND TIMEPIECES, AND ALL OTHER GOODS IN INT. CLASS 14; SOFTWARE APPLICATIONS, DOWNLOADABLE AUDIOVISUAL MEDIA AND BOOKS; HEADPHONES; CARRYING CASES AND ACCESSORIES FOR CELLPHONES AND PERSONAL ELECTRONIC DEVICES, AND ALL OTHER GOODS IN INT. CLASS 9; BAGS, BAGGAGE, WALLET, PURSES, LEATHER AND NON-LEATHER GOODS, AND ALL OTHER GOODS IN INT. CLASS 18; CLOTHING AND WEARING APPAREL, NAMELY, SHIRTS, SHORTS, JEANS, JACKETS, SKIRTS, SLACKS, BLOUSES, DRESSES, VESTS, COATS, SWEATERS, SCARVES, SWIMSUITS, UNDERWEAR, UNDERPANTS, SLIPS, CAMISOLES, BRAS, NIGHTGOWNS, ROBES, T-SHIRTS, LONG SLEEVED SHIRTS, SHORTS, PANTS, JUMPERS, JUMPSUITS, OVERALLS, ONE-PIECE PLAYSUITS, PAJAMAS, DRESSES, LINGERIE; MEN'S, WOMEN'S, CHILDREN'S AND INFANT'S HEADGEAR, NAMELY, HATS, CAPS AND VISORS; BELTS; KERCHIEFS, AND ALL OTHER GOODS IN INT. CLASS 25; PAPER AND PAPER GOODS; BOOKS, MAGAZINES AND PUBLICATIONS; STATIONERY PRODUCTS, PENS AND PENCILS, SCHOOL SUPPLIES, AND ALL OTHER GOODS IN INT. CLASS 16; TOYS, GAMES SPORTING GOODS AND PLAYTHINGS, AND ALL OTHER GOODS IN INT. CLASS 28; SOFTWARE APPLICATIONS, VIDEO GAMES, VIDEO GAME PRODUCTION SERVICES; DOWNLOADABLE AND NON-DOWNLOADABLE SOFTWARE APPLICATIONS; ENTERTAINMENT SERVICES; INFORMATION SERVICES IN THE FIELD OF ENTERTAINMENT, NAMELY, INFORMATION ABOUT MUSIC, FILM, TELEVISION, CELEBRITY AND POPULAR CULTURE PROVIDED OVER THE INTERNET; FAN CLUB SERVICES, AND ALL OTHER SERVICES IN INT. CLASS 41; LICENSING OF INTELLECTUAL PROPERTY AND ALL OTHER SERVICES IN INT. CLASS 42; FOOD PRODUCTS; ALCOHOLIC AND NON-ALCOHOLIC BEVERAGES; ENERGY DRINKS; PRODUCTION OF VIRTUAL REALITY AND AUGMENTED REALITY ENTERTAINMENT

Intent to Use: The applicant has a bona fide intention, and is entitled, to use the mark in commerce on or in connection with the identified goods/services.

Name(s), Portrait(s), Signature(s) of individual(s)

The name(s), portrait(s), and/or signature(s) shown in the mark identifies Ariana Grande-Butera, whose consent(s) to register is made of record.

Original PDF file:

[consent-7621917681-224954605 . AG consent to register.pdf](#)

Converted PDF file(s) (1 page)

[Consent File1](#)

The applicant's current Attorney Information:

Victor K. Sapphire, Esq. of Law Office of Victor Sapphire, Inc. 7190 Sunset Blvd #116
Los Angeles, California 90046
United States
3234497872(phone)
vic@brandidentitylawyer.com (authorized)

The attorney docket/reference number is AG-AGmultcls.

The applicant's current Correspondence Information:

Victor K. Sapphire, Esq.

Law Office of Victor Sapphire, Inc.

7190 Sunset Blvd #116

Los Angeles, California 90046

3234497872(phone)

vic@brandidentitylawyer.com;vixapphire@gmail.com; trademarks@brandidentitylawyer.com (authorized)

E-mail Authorization: I authorize the USPTO to send e-mail correspondence concerning the application to the applicant, the applicant's attorney, or the applicant's domestic representative at the e-mail address provided in this application. I understand that a valid e-mail address must be maintained and that the applicant or the applicant's attorney must file the relevant subsequent application-related submissions via the Trademark Electronic Application System (TEAS). Failure to do so will result in the loss of TEAS Reduced Fee status and a requirement to submit an additional processing fee of \$125 per international class of goods/services.

A fee payment in the amount of \$275 has been submitted with the application, representing payment for 1 class(es).

Declaration☒ **Basis:**

If the applicant is filing the application based on use in commerce under 15 U.S.C. § 1051(a):

- The signatory believes that the applicant is the owner of the trademark/service mark sought to be registered;
- The mark is in use in commerce on or in connection with the goods/services in the application;
- The specimen(s) shows the mark as used on or in connection with the goods/services in the application; and
- To the best of the signatory's knowledge and belief, the facts recited in the application are accurate.

And/Or

If the applicant is filing the application based on an intent to use the mark in commerce under 15 U.S.C. § 1051(b), § 1126(d), and/or § 1126(e):

- The signatory believes that the applicant is entitled to use the mark in commerce;
- The applicant has a bona fide intention to use the mark in commerce on or in connection with the goods/services in the application; and
- To the best of the signatory's knowledge and belief, the facts recited in the application are accurate.

☒ To the best of the signatory's knowledge and belief, no other persons, except, if applicable, concurrent users, have the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other persons, to cause confusion or mistake, or to deceive.

☒ To the best of the signatory's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances, the allegations and other factual contentions made above have evidentiary support.

☒ The signatory being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001, and that such willful false statements and the like may jeopardize the validity of the application or submission or any registration resulting therefrom, declares that all statements made of his/her own knowledge are true and all statements made on information and belief are believed to be true.

Declaration Signature

Signature: /victor sapphire/ Date: 06/01/2017

Signatory's Name: Victor K. Sapphire, Esq.

Signatory's Position: Attorney for Applicant

Payment Sale Number: 87472487

Payment Accounting Date: 06/02/2017

Serial Number: 87472487

Internet Transmission Date: Thu Jun 01 23:30:10 EDT 2017

TEAS Stamp: USPTO/BAS-XX.XXX.XXX.XX-2017060123301037

5945-87472487-59072bb19fa3a83816a2bba89e

ecad1ee29406e88ce1a67a477ee4d227b9ccc5a-

CC-6716-20170601224954605259

ARIANA GRANDE

CONSENT TO REGISTER

I, the undersigned, Ariana Grande-Butera, hereby grant consent to GrandAri, Inc., and its duly appointed agents, attorneys, successors and assigns, permission to register with the United States Patent and Trademark Office the marks ARIANA GRANDE and ARIANA ARMY as a trademark for use in connection with goods and services in each and every International Class for the purpose of using such mark in interstate commerce in connection with the applied for goods and/or services.


Ariana Grande-Butera

EXHIBIT 5

Copyright

United States Copyright Office

[Help](#)

[Search](#)

[History](#)

[Titles](#)

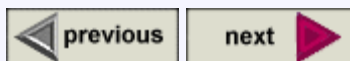
[Start Over](#)

Public Catalog

Copyright Catalog (1978 to present)

Search Request: Left Anchored Title = Thank U, next

Search Results: Displaying 1 of 9 entries



Labeled View

Thank U, Next.

Type of Work: Music

Registration Number / Date: PA0002154953 / 2018-11-20

Application Title: Thank U, Next.

Title: Thank U, Next.

Description: Electronic Deposit.

Copyright Claimant: Tommy Brown, Transfer: By written agreement. Address: street not known, city not known.

Michael Foster, Transfer: By written agreement. Address: street not known, city not known.

Ariana Grande, Transfer: By written agreement. Address: street not known, city not known.

Victoria Monet, Transfer: By written agreement. Address: street not known, city not known.

Taylor Monet Music, Transfer: By written agreement. Address: c/o Warner-Tamerlane Publishing Corp., 10585 Santa Monica Blvd., Los Angeles, CA, 90025, United States.

Warner-Tamerlane Publishing Corp, Transfer: By written agreement. Address: 10585 Santa Monica Blvd, Los Angeles, CA, 90025, United States.

Charles Anderson, Transfer: By written agreement. Address: street not known, city not known.

Date of Creation: 2018

Date of Publication: 2018-11-03

Nation of First Publication: United States

Authorship on Application: Tayla Parx; Domicile: United States; Citizenship: United States. Authorship: music, lyrics.

Charles Michael Anderson; Domicile: not known; Citizenship: not known. Authorship: music, lyrics.

Tommy Brown; Domicile: not known; Citizenship: not known. Authorship: music, lyrics.

Michael Foster; Domicile: not known; Citizenship: not known. Authorship: music,

lyrics.
Ariana Grande; Domicile: not known; Citizenship: not known. Authorship: music,
lyrics.
Victoria Monet; Domicile: not known; Citizenship: not known. Authorship: music,
lyrics.

- Names:** [Parx, Tayla](#)
[Anderson, Charles Michael](#)
[Brown, Tommy](#)
[Foster, Michael](#)
[Grande, Ariana](#)
[Monet, Victoria](#)
[Taylor Monet Music](#)
[Warner-Tamerlane Publishing Corp](#)
[Charles Anderson](#)



Save, Print and Email (Help Page)
Select Download Format Full Record
Enter your email address:

[Help](#) [Search](#) [History](#) [Titles](#) [Start Over](#)

[Contact Us](#) | [Request Copies](#) | [Get a Search Estimate](#) | [Frequently Asked Questions \(FAQs\) about Copyright](#) |
[Copyright Office Home Page](#) | [Library of Congress Home Page](#)

Copyright

United States Copyright Office

[Help](#)

[Search](#)

[History](#)

[Titles](#)

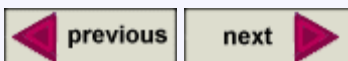
[Start Over](#)

Public Catalog

Copyright Catalog (1978 to present)

Search Request: Left Anchored Title = Thank U, next

Search Results: Displaying 2 of 9 entries



Labeled View

thank u, next.

Type of Work: Motion Picture

Registration Number / Date: PA0002164214 / 2019-02-05

Application Title: thank u, next, Artist: Ariana Grande, USUV71804361 (eSingle Video)

Title: thank u, next.

Description: Electronic file (eService)

Copyright Claimant: Republic Records, A Div. of UMG Recordings, Inc. Address: 2220 Colorado Ave., Santa Monica, CA, 90404, United States.

Date of Creation: 2018

Date of Publication: 2018-11-30

Nation of First Publication: United States

Authorship on Application: Republic Records, A Div. of UMG Recordings, Inc., employer for hire; Domicile: United States. Authorship: entire motion picture.

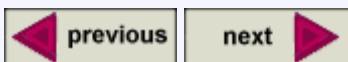
Pre-existing Material: Sound Recording: "thank u, next" (00602577298363)

Basis of Claim: Motion Picture.

Rights and Permissions: Universal Music Group

Names: [UMG Recordings, Inc.](#)

[Republic Records](#)



Save, Print and Email ([Help Page](#))

Select Download Format Full Record

Enter your email address:

[Help](#) [Search](#) [History](#) [Titles](#) [Start Over](#)

Copyright

United States Copyright Office

[Help](#)

[Search](#)

[History](#)

[Titles](#)

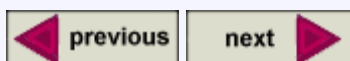
[Start Over](#)

Public Catalog

Copyright Catalog (1978 to present)

Search Request: Left Anchored Title = Thank U, next

Search Results: Displaying 8 of 9 entries



Labeled View

"7 Rings".

Type of Work: Music

Registration Number / Date: PA0002191175 / 2019-03-27

Application Title: "7 Rings".

Title: "7 Rings".

Appears in: ["Thank U, Next" by Ariana Grande](#)

Description: Electronic file (eService)

Copyright Claimant: Ariana Grande, Transfer: By written agreement. Address: street not known, city not known.

Kimberly Krysiuk, Transfer: By written agreement. Address: street not known, city not known.

Victoria Monet, Transfer: By written agreement. Address: street not known, city not known.

Njomza Vitia, Transfer: By written agreement. Address: street not known, city not known.

Taylor Monet Music, Transfer: By written agreement. Address: c/o Warner-Tamerlane Publishing Corp, 777 S Santa Fe Ave, Los Angeles, CA, 90021, United States.

Warner-Tamerlane Publishing Corp, Transfer: By written agreement. Address: 777 S Santa Fe Ave, Los Angeles, CA, 90021, United States.

Date of Creation: 2019

Date of Publication: 2019-01-18

Nation of First Publication: United States

Authorship on Application: Tayla Parx; Domicile: United States; Citizenship: United States. Authorship: music, lyrics.

Ariana Grande; Domicile: not known; Citizenship: not known. Authorship: music, lyrics.

Kimberly Krysiuk; Domicile: not known; Citizenship: not known. Authorship: music, lyrics.

Victoria Monet; Domicile: not known; Citizenship: not known. Authorship: music, lyrics.

Njomza Vitia; Domicile: not known; Citizenship: not known. Authorship: music, lyrics.

Pre-existing Material: portions of My Favorite Things by Rodgers and Hammerstein.

Basis of Claim: music and lyrics.

Copyright Note: C.O. correspondence.

Names: [Parx, Tayla](#)
[Grande, Ariana](#)
[Krysiuk, Kimberly](#)
[Monet, Victoria](#)
[Vitia, Njomza](#)
[Taylor Monet Music](#)
[Warner-Tamerlane Publishing Corp](#)



Save, Print and Email (Help Page)
Select Download Format Full Record
Enter your email address:

[Help](#) [Search](#) [History](#) [Titles](#) [Start Over](#)

[Contact Us](#) | [Request Copies](#) | [Get a Search Estimate](#) | [Frequently Asked Questions \(FAQs\) about Copyright](#) | [Copyright Office Home Page](#) | [Library of Congress Home Page](#)

Copyright

United States Copyright Office

[Help](#)

[Search](#)

[History](#)

[Titles](#)

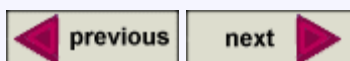
[Start Over](#)

Public Catalog

Copyright Catalog (1978 to present)

Search Request: Left Anchored Title = 7 rings

Search Results: Displaying 7 of 13 entries



Labeled View

7 rings (eSingle Video)

Type of Work: Motion Picture

Registration Number / Date: PA0002177521 / 2019-03-21

Application Title: 7 rings, Artist: Ariana Grande, USUV71900118 (eSingle Video)

Title: 7 rings (eSingle Video)

Description: Electronic file (eService)

Copyright Claimant: Republic Records, A Div. of UMG Recordings, Inc. Address: 2220 Colorado Ave., Santa Monica, CA, 90404, United States.

Date of Creation: 2019

Date of Publication: 2019-01-18

Nation of First Publication: United States

Authorship on Application: Republic Records, A Div. of UMG Recordings, Inc., employer for hire; Domicile: United States. Authorship: entire motion picture.

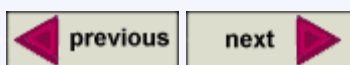
Pre-existing Material: Motion Picture Sounds (00602577432804)

Basis of Claim: Motion Picture.

Rights and Permissions: Universal Music Group

Names: [Republic Records](#)

[UMG Recordings, Inc.](#)



Save, Print and Email ([Help Page](#))

Select Download Format Full Record

Enter your email address:

[Help](#) [Search](#) [History](#) [Titles](#) [Start Over](#)

Copyright

United States Copyright Office

[Help](#)

[Search](#)

[History](#)

[Titles](#)

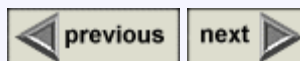
[Start Over](#)

Public Catalog

Copyright Catalog (1978 to present)

Search Request: Left Anchored Title = break up with your girlfriend, I'm bored

Search Results: Displaying 1 of 1 entries



Labeled View

break up with your girlfriend, i'm bored.

Type of Work: Motion Picture

Registration Number / Date: PA0002182759 / 2019-04-02

Application Title: break up with your girlfriend, i'm bored, Artist: Ariana Grande, USUV71900275 (eSingle Video)

Title: break up with your girlfriend, i'm bored.

Description: Electronic file (eService)

Copyright Claimant: Republic Records, A Div. of UMG Recordings, Inc. Address: 2220 Colorado Ave., Santa Monica, CA, 90404, United States.

Date of Creation: 2019

Date of Publication: 2019-02-08

Nation of First Publication: United States

Authorship on Application: Republic Records, A Div. of UMG Recordings, Inc., employer for hire; Domicile: United States. Authorship: entire motion picture.

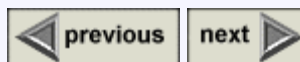
Pre-existing Material: Motion Picture Sounds (00602577378034)

Basis of Claim: Motion Picture.

Rights and Permissions: Universal Music Group

Names: [UMG Recordings, Inc.](#)

[Republic Records](#)



Save, Print and Email ([Help Page](#))

Select Download Format Full Record

Enter your email address: