

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

Union Imagination Tech. Co. Ltd.,	)	
	Plaintiff,	)
		) Case No. 1:26-cv-05537
v.		)
		)
John Doe,		)
	Defendant	)

Complaint

NOW COMES Union Imagination Tech. Co. Ltd. (“Plaintiff”), by and through its undersigned counsel and hereby brings its case against the John Doe identified on Schedule A attached hereto (“Defendant”), and alleges as follows:

Introduction

1. This action has been filed by Plaintiff to combat an online copyright infringer who offers for sale products, including home goods, using unauthorized copies and/or derivative versions of Plaintiff’s copyrighted works.
2. Defendant has traded and continues to trade upon Plaintiff’s commercial reputation and goodwill by offering for sale and/or selling unlicensed products using pirated copies of Plaintiff’s registered copyrights to consumers within the United States, including the State of Illinois and this Judicial District.
3. Defendant has created a fully interactive, commercial internet stores operating under at least the online marketplace account identified in **Schedule A** attached hereto (the “Defendant Online Store”) and intentionally designed it to appear to be selling genuine Plaintiff products, while actually selling Defendant’s own products to unknowing consumers.
4. Defendant attempts to avoid liability by going to lengths to conceal both its identity and the full scope and interworking of its infringing operation. Plaintiff is forced to file this action to

combat Defendant's unauthorized use of Plaintiff's copyrighted works, as well as to protect unknowing consumers from purchasing unauthorized products over the Internet.

5. Plaintiff has been and continues to be irreparably damaged through the piracy of the Plaintiff Works as a result of Defendant's actions and accordingly seeks injunctive and monetary relief.

Jurisdiction and Venue

6. This Court has original subject matter jurisdiction over the claims in this action pursuant to 17 U.S.C. § 501, *et seq.*, and 28 U.S.C. §§ 1331, 1338(a)-(b).
7. Venue is proper in this Court pursuant to 28 U.S.C. § 1391, and this Court may properly exercise personal jurisdiction over Defendant because Defendant directly targets its business activities toward consumers in the United States, including Illinois and this Judicial District, through at least the Defendant Online Store. Specifically, Defendant is reaching out to do business with residents of Illinois and this Judicial District by operating at least one commercial, fully-interactive Defendant Online Stores through which residents of Illinois and this Judicial District can purchase and/or have purchased products being offered for sale and sold using unauthorized reproductions of the Plaintiff Works. Defendant has targeted sales from residents of Illinois and this Judicial District by operating the Defendant Online Store that accepts payment in U.S. dollars and offers shipping to addresses within Illinois and this Judicial District for products offered using and with pirated copies of Plaintiff's copyrighted works. Defendant has committed and is committing tortious acts in Illinois and this Judicial District, is engaging in interstate commerce, and has wrongfully caused Plaintiff substantial injury in the State of Illinois.

Parties

8. Plaintiff specializes in the creation, manufacture, marketing, and sale of home good products (collectively, the "Plaintiff Products").

9. In the interest of promoting the Plaintiff Products, Plaintiff created and produced photos of the Plaintiff Products and their characteristics (the “Plaintiff Works”). A true and correct copy of the federal copyright registrations certificates of the Plaintiff Works are attached hereto as **Exhibit 1**.
10. Plaintiff’s federal registrations for the Plaintiff Works are valid, subsisting, and in full force and effect.
11. Plaintiff owns all rights, including without limitation, the rights to reproduce the Plaintiff Works in copies, to prepare derivative works based upon the Plaintiff Works, to distribute copies of the Plaintiff Works to the public, and to display the Plaintiff Works publicly.
12. Plaintiff has continuously used the Plaintiff Works in connection with the sale, distribution, promotion, and advertising of genuine Plaintiff Products and consumers associate the Plaintiff Works with Plaintiff and their authorized Plaintiff Products.
13. Genuine Plaintiff Products have become very popular, driven by Plaintiff’s elevated quality standards and innovative designs.
14. Genuine Plaintiff Products have been distributed, promoted and sold through distributors throughout the world, including the United States and on Amazon.com. Plaintiff’s sales of authorized Plaintiff Products have been substantial.
15. The success of Plaintiff’s business enterprise is dependent and a result of its effort to market and advertise online via e-commerce, including the use of the Plaintiff Works to offer to sell the Plaintiff Products.
16. Plaintiff has made efforts to protect its interests in and to the Plaintiff Works. Plaintiff’s is the only business authorized to reproduce or display the Plaintiff Works or prepare derivative works thereof. Plaintiff has not licensed or authorized Defendant to exploit the Plaintiff Works in any way.

17. Defendant is an individual or business entity who, upon information and belief, resides in the People's Republic of China or another foreign jurisdiction. Defendant conducts business throughout the United States, including within the State of Illinois and this Judicial District, through the operation of the fully interactive Defendant Online Store which operates on the commercial online marketplace Amazon.com. Defendant targets the United States, including Illinois and this Judicial District, and has offered to sell and, on information and belief, has sold and continues to sell Infringing Products to consumers within the United States, including the State of Illinois and this Judicial District.

Defendant's Unlawful Conduct

18. Marketplaces like eBay and Amazon, among others, allow merchants to quickly “set up shop” and flood the market with unauthorized goods which displace actual sales manufacturers would otherwise enjoy.
19. It has been estimated that e-commerce intellectual property infringement costs merchants in the U.S. alone nearly \$41 billion¹ with Department of Homeland Security seizures of infringing goods increasing more than 10-fold between 2000 and 2018² and a street value of seized goods increasing 246% from 2017 to 2022.³
20. U.S. Customs and Border Protection (“CBP”) reported that for Fiscal Year 2023, it seized nearly 23 million counterfeit goods with a collective manufacturer's suggested retail price of over \$2.7

¹ The National Bureau of Asian Research, The Report of the Commission on the Theft of American Intellectual Property, at 9, Pub. The Commission on the Theft of American Intellectual Property 2017, available at http://www.ipcommission.org/report/IP_Commission_Report_Update_2017.pdf.

² U.S. Department of Homeland Security, *Combating Trafficking in Counterfeit and Pirated Goods Report to the President of the United States*, January 24, 2020.

³ U.S. Customs and Border Protection Office of Trade, FY 2022 Fact Sheet Intellectual Property Rights, available at <https://www.cbp.gov/sites/default/files/assets/documents/2023-Mar/IPR%20Fact%20Sheet%20FY2022%20Final%20Draft%20%28508%29%20%28004%29%20%282%29.pdf>

billion (USD), with 46% of those seizures and 84% of the value coming from China and Hong Kong.⁴

21. Legislation was recently introduced in the U.S. Senate that would allow CBP to seize articles that infringe design patents, thus closing a loophole currently exploited by infringers.⁵
22. Infringing and pirated products account for billions in economic losses, resulting in thousands of lost jobs for legitimate businesses and broader economic losses, including lost tax revenue.⁶
23. Third party service providers like those used by Defendant do not robustly 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.”⁷
24. DHS has observed that “at least some e-commerce platforms, little identifying information is necessary for [an infringer] to begin selling” and recommending that “[s]ignificantly enhanced vetting of third-party sellers” is necessary. Infringers hedge against the risk of being caught and having their websites taken down from an e-commerce platform by preemptively establishing multiple virtual storefronts.⁸
25. 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.⁹

⁴ U.S. Customs and Border Protection FY 2023 FACT SHEET Intellectual Property rights, available at https://www.cbp.gov/sites/default/files/2024-05/IPR%20FACT%20SHEET%20FISCAL%20YEAR%202023%20PBRB%20APPROVED%20%28508%29_5.29.pdf.

⁵ Press Release, U.S. Senator Thom Tillis, Tillis, Coons, Cassidy & Hirono Introduce Bipartisan Legislation to Seize Counterfeit Products and Protect American Consumers and Businesses (Dec. 5, 2019).

⁶ OECD, *The Economic Impact of Counterfeiting and Piracy* 2008, Available at https://www.oecd.org/content/dam/oecd/en/publications/reports/2008/06/the-economic-impact-of-counterfeiting-and-piracy_g1gh906c/9789264045521-en.pdf

⁷ Daniel C.K. Chow, *Alibaba, Amazon, and Counterfeiting in the Age of the Internet*, 40 NW. J. INT’L L. & BUS. 157, 186 (2020).

⁸ *Combating Trafficking in Counterfeit and Pirated Goods Report to the President of the United States*, at p. 22.

⁹ *Id.*, at p. 39.

26. Further, “E-commerce platforms create bureaucratic or technical hurdles in helping brand owners to locate or identify sources of [infringement].”¹⁰
27. Defendant takes pains to conceal its identity from the public, using a meaningless store name and address which do not identify Defendant. Moreover, infringers like Defendant will often register new store accounts under new fictitious names when it receives notice that one or more stores have been the subject of a lawsuit. The use of these store registration schemes is one of several ways in which Defendant may avoid being shut down and conceal its true identity and the inner workings of its infringement operations.
28. Infringers like Defendant will typically ship infringing products in small quantities via international mail to mitigate detection by U.S. Customs and Border Protection. Further, it will typically operate multiple credit card merchant accounts or use layers of payment gateways to forestall their cashflow being interrupted due to trademark enforcement efforts. On information and belief, Defendant utilizes offshore bank accounts and routinely move funds from U.S.-based merchant accounts (*e.g.*, within China) outside the jurisdiction of this Court.
29. Defendant, without any authorization or license from Plaintiff, has knowingly and willfully copied, reproduced, displayed, and otherwise exploited the Plaintiff Works in connection with the advertisement, distribution, offering for sale, and sale of products into the United States and into Illinois over the Internet.
30. The Defendant Online Store offers shipping to the United States, including, specifically Illinois, and, on information and belief, Defendant has offered to sell or/or sold Infringing Products into the United States and the state of Illinois.
31. Plaintiff has been and continues to be irreparably harmed through loss of control over Plaintiff’s reputation, goodwill, and exclusive rights in and to the Plaintiff Works.

¹⁰ *Alibaba, Amazon, and Counterfeiting in the Age of the Internet*, 40 NW. J. INT’L L. & BUS. at 186-187.

Count I - Copyright Infringement (17 U.S.C. § 501)

32. Plaintiff repeats, re-alleges, and incorporates by reference the allegations set forth in Paragraphs 1 through 31.
33. Plaintiff is the owner of the original Plaintiff Works registered and contained in **Exhibit 1**.
34. The Plaintiff Works have significant value and have been produced and created at considerable expense.
35. Among the rights granted to Plaintiff is the exclusive right to reproduce and display the Plaintiff Works and make derivative works thereof.
36. Upon information and belief, Defendant had access to the work in **Exhibit 1** through viewing Plaintiff's sale of its genuine Plaintiff Products which were advertised and sold in association with the Plaintiff Works, including also on Amazon.com. After accessing the Plaintiff Works, Defendant wrongfully created copies of the copyrighted Plaintiff Works without Plaintiff's consent and engaged in acts of widespread infringement through the reproduction and display of images containing the Plaintiff Works, posting the images via online websites and digital markets, and the sale of home goods-type item product listings using the Plaintiff Works without authorization.
37. Defendant, without the permission or consent of the Plaintiff, has offered to sell, sold and continues to sell products advertised by and with the Plaintiff Works, and itemized in **Schedule A** hereto, and reproduces, displays, and/or distributes the Plaintiff Works or derivative versions thereof without authorization from Plaintiff and in violation of Plaintiff's exclusive rights under 17 U.S.C. § 106.
38. As a direct result of their acts of copyright infringement, Defendant has obtained direct and indirect profits it would not otherwise have realized but for their infringement of the copyrighted Plaintiff Works.

39. Defendant knew their acts constituted copyright infringement and Defendant's conduct was willful within the meaning of the Copyright Act.
40. As a result of their wrongful conduct, Defendant is liable to Plaintiff for copyright infringement pursuant to 17 U.S.C. § 501.
41. Plaintiff has suffered, and will continue to suffer, substantial losses, including but not limited to damage to its business reputation and goodwill as a direct result of Defendant's infringements.
42. Plaintiff is entitled to recover damages, which include its losses and any and all profits Defendant has made as a result of its wrongful conduct.
43. As a result of Defendant's infringement of Plaintiff's exclusive rights under copyright, Plaintiff is entitled to relief pursuant to 17 U.S.C. § 504 and to Plaintiff's attorneys' fees and costs pursuant to 17 U.S.C. § 505.
44. The conduct of Defendant is causing and, unless enjoined and restrained by this Court, will continue to cause Plaintiff great and irreparable injury that cannot fully be compensated or measured in money. Plaintiff has no adequate remedy at law. Pursuant to 17 U.S.C. §§ 502, 503, Plaintiff is entitled to injunctive relief prohibiting Defendant from further infringing Plaintiff's copyrights and ordering that Defendant destroy all unauthorized copies.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendant as follows:

- 1) That Defendant, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under, or in concert with them be temporarily, preliminarily, and permanently enjoined and restrained from:
 - a. reproducing, distributing copies of, making derivative works of, or publicly displaying the Plaintiff Works in any manner without the express authorization of Plaintiff; and

- b.** 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 or authorized by or for Plaintiff and which bear any of the Plaintiff Works.
- 2)** Entry of an Order that, upon Plaintiff's request, those in privity with Defendant and those with notice of the injunction, including, without limitation, any online marketplace platforms such as Amazon, eBay and Walmart, sponsored search engine or ad-word providers, credit cards, banks, merchant account providers, third party processors and other payment processing service providers, and Internet search engines such as Google, Bing and Yahoo (collectively, the "Third Party Providers") shall:
 - a.** disable and cease providing services being used by Defendant, currently or in the future, to engage in the sale of products not authorized by Plaintiff which reproduce the Plaintiff Works or are derived from the Plaintiff Works;
 - b.** disable and cease displaying any advertisements used by or associated with Defendant in connection with the sale of products not authorized by Plaintiff which are using or derived from the Plaintiff Works; and
 - c.** take all steps necessary to prevent links to the products associated with Defendant Online Store identified on Schedule A from displaying in search results, including, but not limited to, removing links to the Defendant Online Store from any search index.
- 3)** For Judgment in favor of Plaintiff against Defendant that it has: (i) willfully infringed Plaintiff's rights in its federally registered copyright pursuant to 17 U.S.C. § 501; and (ii) otherwise injured the business reputation and business of Plaintiff by Defendant's acts and conduct set forth in this Complaint;

- 4) For Judgment in favor of Plaintiff against Defendant for actual damages or other available damages pursuant to 17 U.S.C. § 504, at the election of Plaintiff, in an amount to be determined at trial;
- 5) That Defendant accounts for and pays to Plaintiff all profits realized by Defendant by reason of Defendant's unlawful acts herein alleged;
- 6) That Plaintiff be awarded its reasonable attorneys' fees and costs under 17 U.S.C. § 505 as may be allowable; and
- 7) Award any and all other relief that this Court deems just and proper.

Dated: May 13, 2026

Respectfully submitted,

/s/Adam E. Urbanczyk
Adam E. Urbanczyk
AU LLC
444 W. Lake St. 17th Floor
Chicago, IL 60606
(312) 715-7312
adamu@au-llc.com
Counsel for Plaintiff

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

Union Imagination Tech. Co. Ltd.,	)	
	)	Case No. 1:26-cv-05537
	)	
v.	)	Dist. Judge John J. Tharp Jr.
	)	
John Doe,	)	Mag. Judge Beth W. Jantz
	)	

Corrected Schedule A to the Complaint

Store	Store URL	Listing URL	ASIN	Infringed Copyright Reg. No.
<u>MHBEST</u>	https://www.amazon.com/sp?ie=UTF8&seller=A2YA3PLVGN-D5MC&asin=B0CB33FL5J&ref=dp_merchant_link&isAmazonFulfilled=1	https://www.amazon.com/dp/B0DXVSWL2L/	B0DXVSWL2L	VA 2-497-331
		https://www.amazon.com/dp/B0F7RTQTV2/	B0F7RTQTV2	VA 2-497-329
		https://www.amazon.com/dp/B0FJSKGX6Q/	B0FJSKGX6Q	VA 2-497-325
		https://www.amazon.com/dp/B0FNX3YNNM/	B0FNX3YNNM	VA 2-497-003
		https://www.amazon.com/dp/B0FFBJ5TWN/	B0FFBJ5TWN	VA 2-497-324

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

Union Imagination Tech. Co. Ltd.,	)	
	)	
	)	Case No. 1:26-cv-05537
v.	)	
	)	
John Doe,	)	
	)	
	)	

Exhibit 1 to the Complaint

Exhibit 1

Registration #: VA0002497003
Service Request #: 1-15143846701

Mail Certificate

Xingyi Tao
10685-B Hazelhurst Dr. #29808
Houston, TX 77043 United States

Priority: Special Handling

Application Date: April 17, 2026

Correspondent

Name: Xingyi Tao
Email: taoxingyi@daoleerlaw.com
Address: 10685-B Hazelhurst Dr. #29808
Houston, TX 77043 United States

Registration Number
VA 2-497-003
Effective Date of Registration:
April 17, 2026
Registration Decision Date:
April 17, 2026

Copyright Registration for a Group of Published Photographs

Registration issued pursuant to 37 C.F.R. § 202.4(i)

For Photographs Published: November 14, 2024 to November 14, 2024

Title

Title of Group: Hole Pumpkin Fish Hideout
Number of Photographs in Group: 10

- Individual Photographs:** Hole Pumpkin Fish Hideout 1,
Hole Pumpkin Fish Hideout 2,
Hole Pumpkin Fish Hideout 3,
Hole Pumpkin Fish Hideout 4,
Hole Pumpkin Fish Hideout 5,
Hole Pumpkin Fish Hideout 6,
Hole Pumpkin Fish Hideout 7,
Hole Pumpkin Fish Hideout 8,
Hole Pumpkin Fish Hideout 9,
Hole Pumpkin Fish Hideout 10

Published: November 2024

Completion/Publication

Year of Completion: 2024
Earliest Publication Date in Group: November 14, 2024
Latest Publication Date in Group: November 14, 2024
Nation of First Publication: United States

Author

- Author:** UNION IMAGINATION TECHNOLOGY LIMITED
Author Created: photographs
Work made for hire: Yes
Citizen of: Hong Kong

Copyright Claimant

Copyright Claimant: UNION IMAGINATION TECHNOLOGY LIMITED
FLAT/RM 511 5/F MING SANG IND BLDG 19-21 HING YIP ST KWUN
TONG, HONG KONG, China

Rights and Permissions

Organization Name: UNION IMAGINATION TECHNOLOGY LIMITED
Email: qiuhuab@zrkgq.com

Certification

Name: Dantong Chen
Date: April 17, 2026

Copyright Office notes: Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.





















Registration #: VA0002497324
Service Request #: 1-15143774231

Mail Certificate

Xingyi Tao
10685-B Hazelhurst Dr. #29808
Houston, TX 77043 United States

Priority: Special Handling

Application Date: April 20, 2026

Correspondent

Name: Xingyi Tao
Email: taoxingyi@daoleerlaw.com
Address: 10685-B Hazelhurst Dr. #29808
Houston, TX 77043 United States

Registration Number
VA 2-497-324
Effective Date of Registration:
April 20, 2026
Registration Decision Date:
April 20, 2026

Copyright Registration for a Group of Published Photographs

Registration issued pursuant to 37 C.F.R. § 202.4(i)

For Photographs Published: July 04, 2024 to July 04, 2024

Title

Title of Group: Devil Horn Hair Clip
Number of Photographs in Group: 10

- Individual Photographs:** Devil Horn Hair Clip 1,
Devil Horn Hair Clip 2,
Devil Horn Hair Clip 3,
Devil Horn Hair Clip 4,
Devil Horn Hair Clip 5,
Devil Horn Hair Clip 6,
Devil Horn Hair Clip 7,
Devil Horn Hair Clip 8,
Devil Horn Hair Clip 9,
Devil Horn Hair Clip 10

Published: July 2024

Completion/Publication

Year of Completion: 2024
Earliest Publication Date in Group: July 04, 2024
Latest Publication Date in Group: July 04, 2024
Nation of First Publication: United States

Author

- Author:** UNION IMAGINATION TECHNOLOGY LIMITED
Author Created: photographs
Work made for hire: Yes
Citizen of: Hong Kong

Copyright Claimant

Copyright Claimant: UNION IMAGINATION TECHNOLOGY LIMITED
FLAT/RM 511 5/F MING SANG IND BLDG 19-21 HING YIP ST KWUN
TONG, HONGKONG, China

Rights and Permissions

Organization Name: UNION IMAGINATION TECHNOLOGY LIMITED
Email: qiuhuab@zrkgq.com

Certification

Name: Dantong Chen
Date: April 20, 2026

Copyright Office notes: Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.





















Registration #: VA0002497325
Service Request #: 1-15143846725

Mail Certificate

Xingyi Tao
10685-B Hazelhurst Dr. #29808
Houston, TX 77043 United States

Priority: Special Handling

Application Date: April 20, 2026

Correspondent

Name: Xingyi Tao
Email: taoxingyi@daoleerlaw.com
Address: 10685-B Hazelhurst Dr. #29808
Houston, TX 77043 United States

Registration Number
VA 2-497-325
Effective Date of Registration:
April 20, 2026
Registration Decision Date:
April 20, 2026

Copyright Registration for a Group of Published Photographs

Registration issued pursuant to 37 C.F.R. § 202.4(i)

For Photographs Published: August 13, 2024 to August 13, 2024

Title

Title of Group: Eight-tube Culture Plate
Number of Photographs in Group: 10

- Individual Photographs:** Eight-tube Culture Plate 1,
Eight-tube Culture Plate 2,
Eight-tube Culture Plate 3,
Eight-tube Culture Plate 4,
Eight-tube Culture Plate 5,
Eight-tube Culture Plate 6,
Eight-tube Culture Plate 7,
Eight-tube Culture Plate 8,
Eight-tube Culture Plate 9,
Eight-tube Culture Plate 10

Published: August 2024

Completion/Publication

Year of Completion: 2024
Earliest Publication Date in Group: August 13, 2024
Latest Publication Date in Group: August 13, 2024
Nation of First Publication: United States

Author

- Author:** UNION IMAGINATION TECHNOLOGY LIMITED
Author Created: photographs
Work made for hire: Yes
Citizen of: Hong Kong

Copyright Claimant

Copyright Claimant: UNION IMAGINATION TECHNOLOGY LIMITED
FLAT/RM 511 5/F MING SANG IND BLDG 19-21 HING YIP ST KWUN
TONG, HONG KONG, China

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Organization Name: UNION IMAGINATION TECHNOLOGY LIMITED
Email: qiuhuab@zrkgq.com

Certification

Name: Dantong Chen
Date: April 20, 2026

Copyright Office notes: Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

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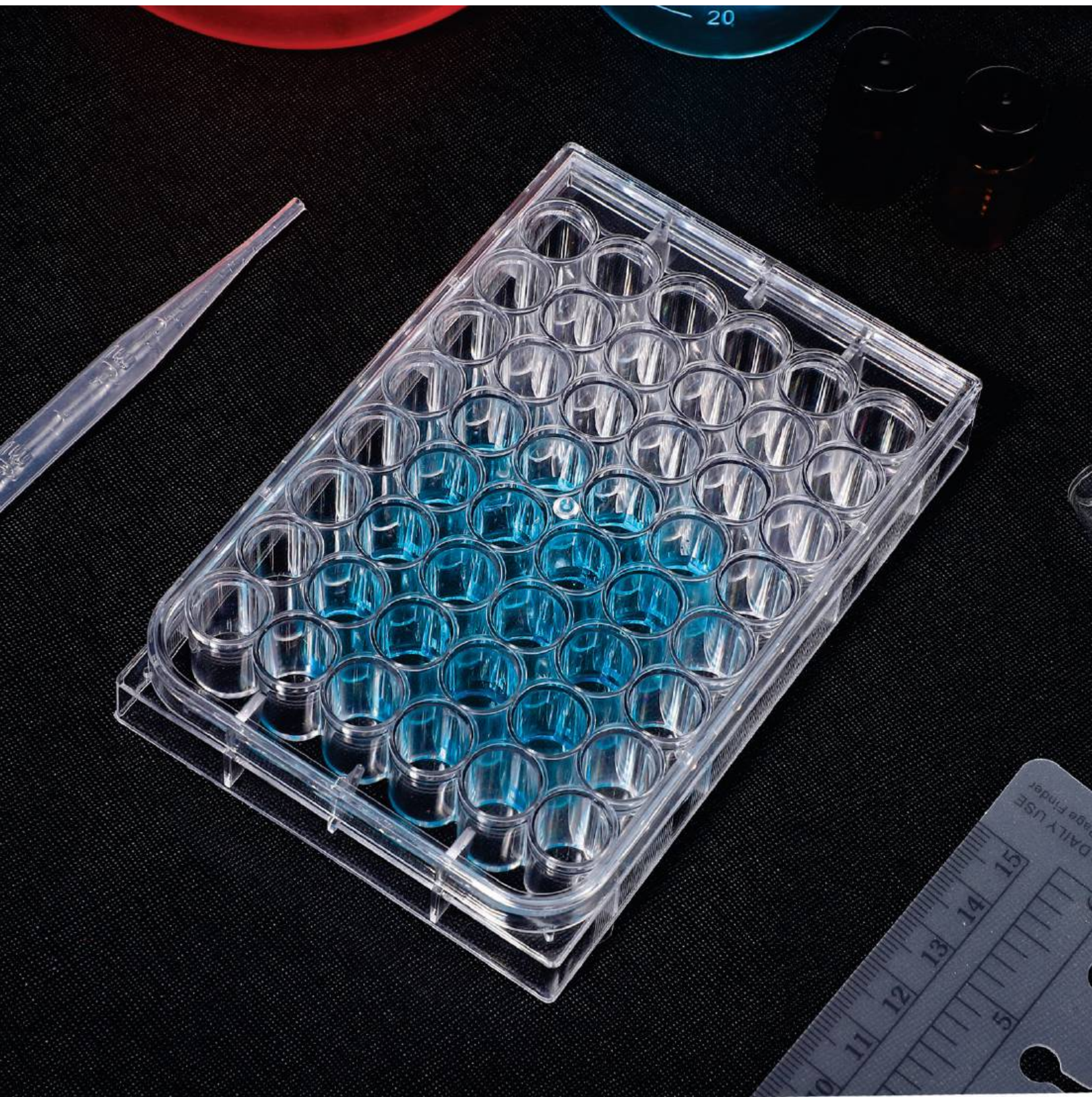


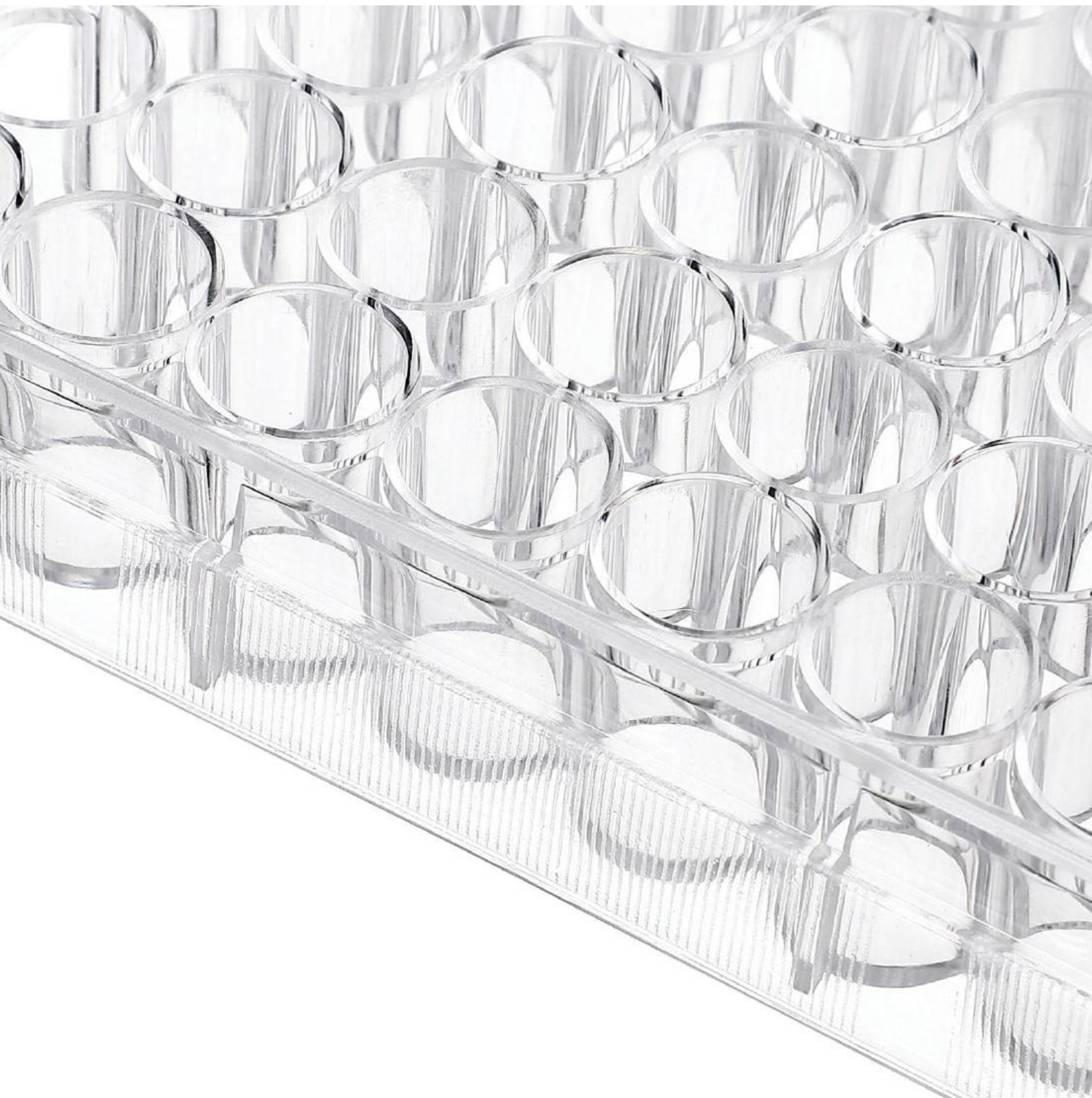












Registration #: VA0002497329
Service Request #: 1-15143846769

Mail Certificate

Xingyi Tao
10685-B Hazelhurst Dr. #29808
Houston, TX 77043 United States

Priority: Special Handling

Application Date: April 20, 2026

Correspondent

Name: Xingyi Tao
Email: taoxingyi@daoleerlaw.com
Address: 10685-B Hazelhurst Dr. #29808
Houston, TX 77043 United States

Registration Number
VA 2-497-329
Effective Date of Registration:
April 20, 2026
Registration Decision Date:
April 20, 2026

Copyright Registration for a Group of Published Photographs

Registration issued pursuant to 37 C.F.R. § 202.4(i)

For Photographs Published: January 02, 2025 to January 02, 2025

Title

Title of Group: Alien Tentacle Headband
Number of Photographs in Group: 10

- Individual Photographs:** Alien Tentacle Headband 1,
Alien Tentacle Headband 2,
Alien Tentacle Headband 3,
Alien Tentacle Headband 4,
Alien Tentacle Headband 5,
Alien Tentacle Headband 6,
Alien Tentacle Headband 7,
Alien Tentacle Headband 8,
Alien Tentacle Headband 9,
Alien Tentacle Headband 10

Published: January 2025

Completion/Publication

Year of Completion: 2024
Earliest Publication Date in Group: January 02, 2025
Latest Publication Date in Group: January 02, 2025
Nation of First Publication: United States

Author

- Author:** UNION IMAGINATION TECHNOLOGY LIMITED
Author Created: photographs
Work made for hire: Yes
Citizen of: Hong Kong

Copyright Claimant

Copyright Claimant: UNION IMAGINATION TECHNOLOGY LIMITED
FLAT/RM 511 5/F MING SANG IND BLDG 19-21 HING YIP ST KWUN
TONG, HONG KONG, China

Rights and Permissions

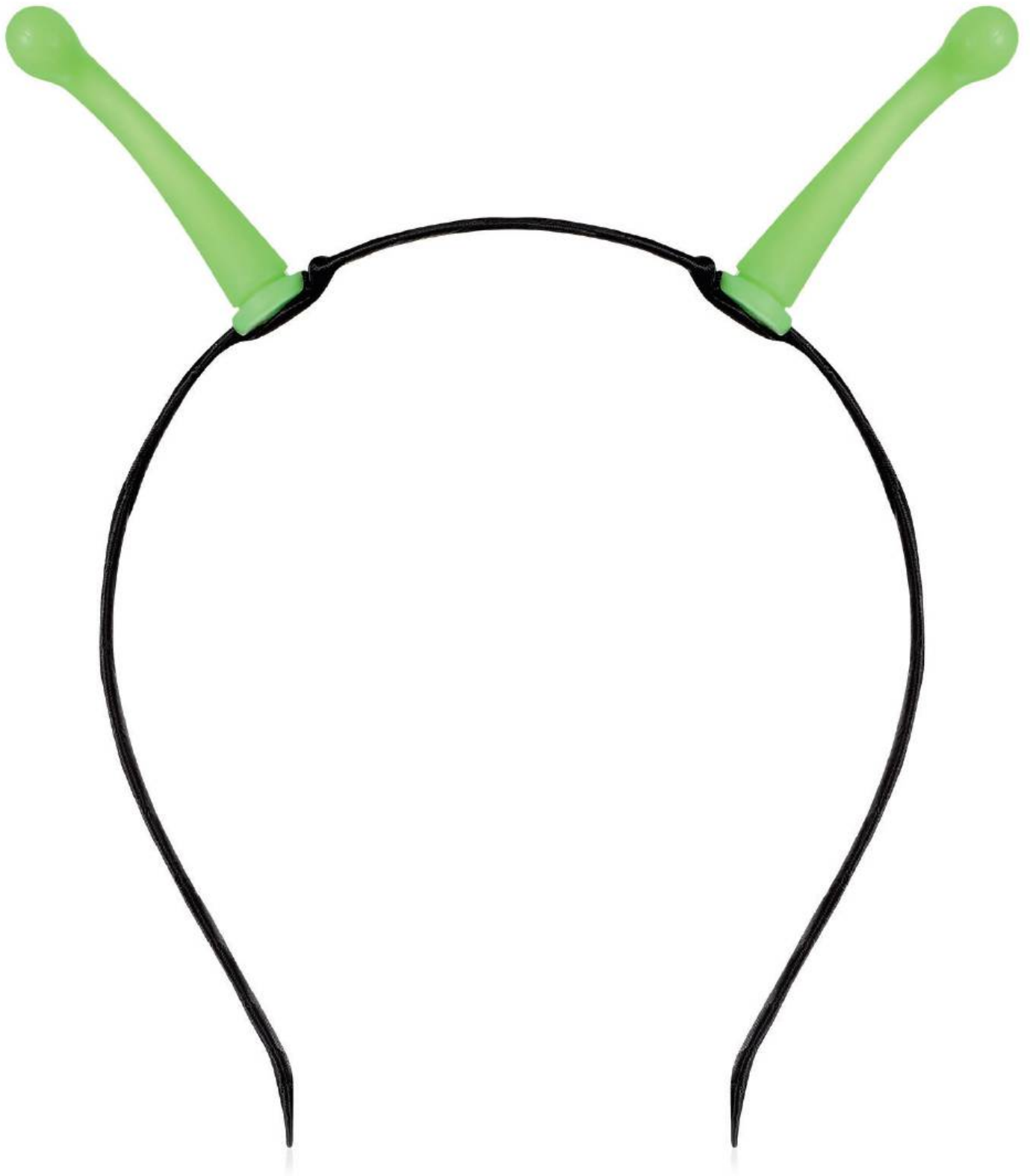
Organization Name: UNION IMAGINATION TECHNOLOGY LIMITED
Email: qiuhuab@zrkgq.com

Certification

Name: Dantong Chen
Date: April 20, 2026

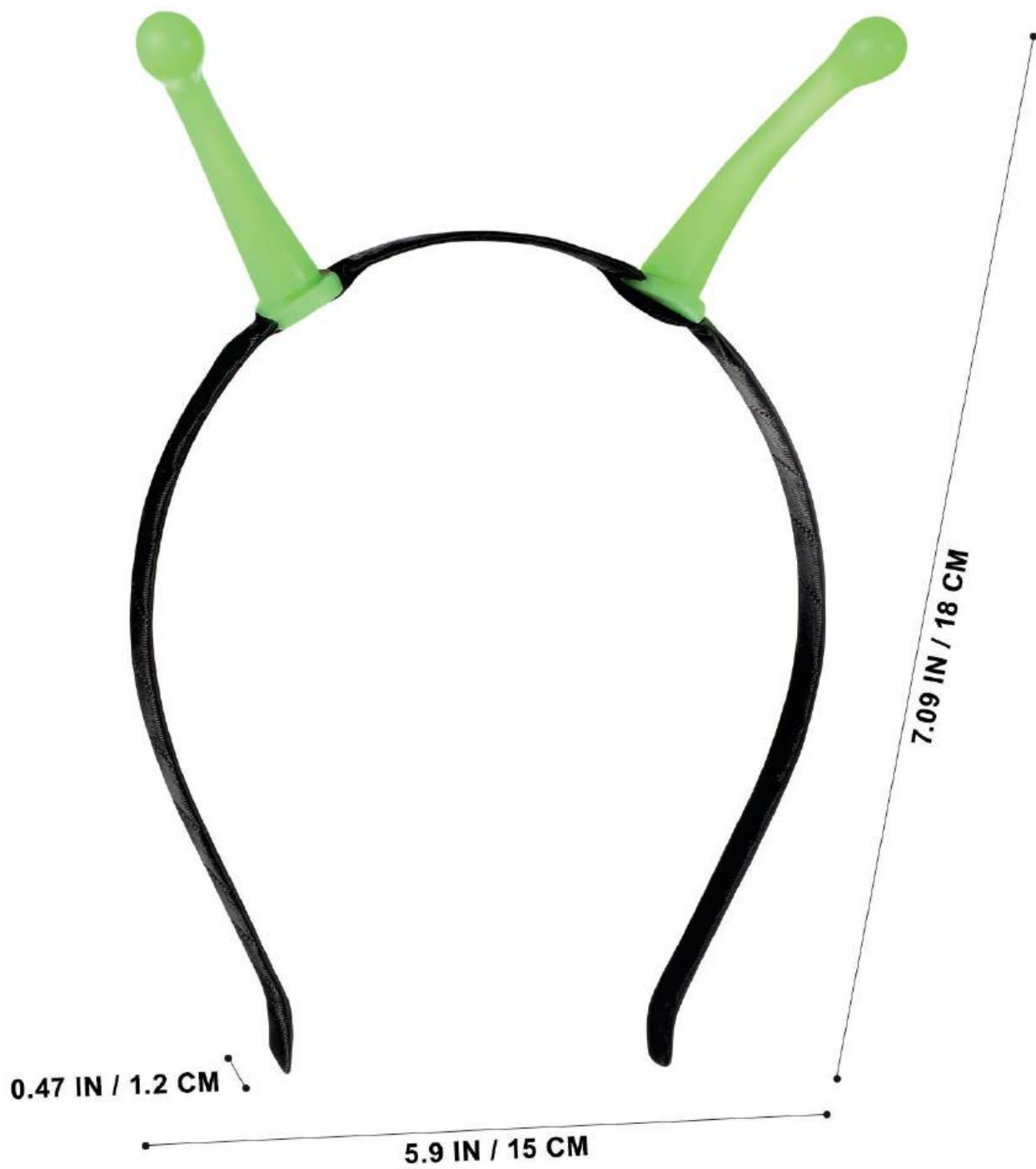
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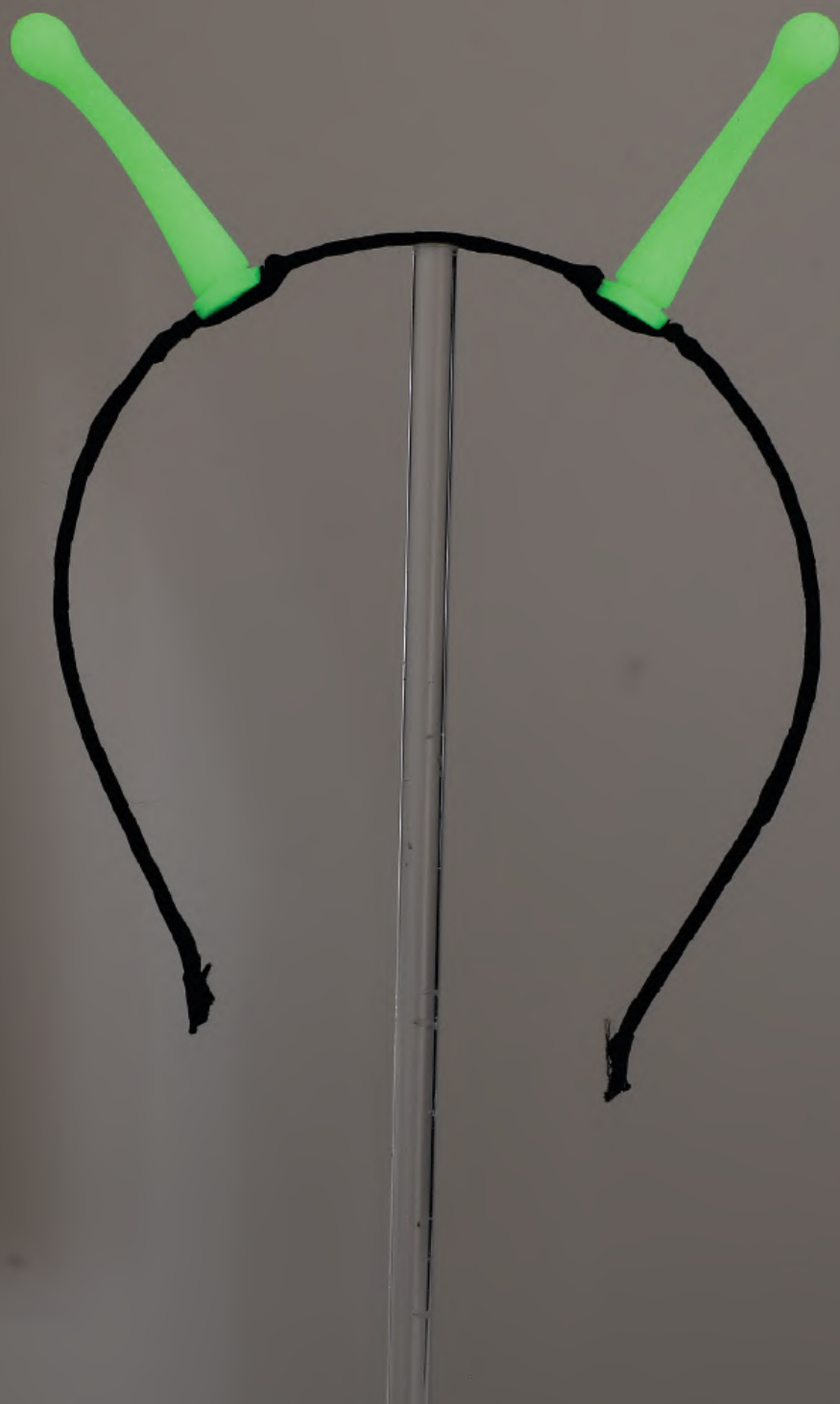




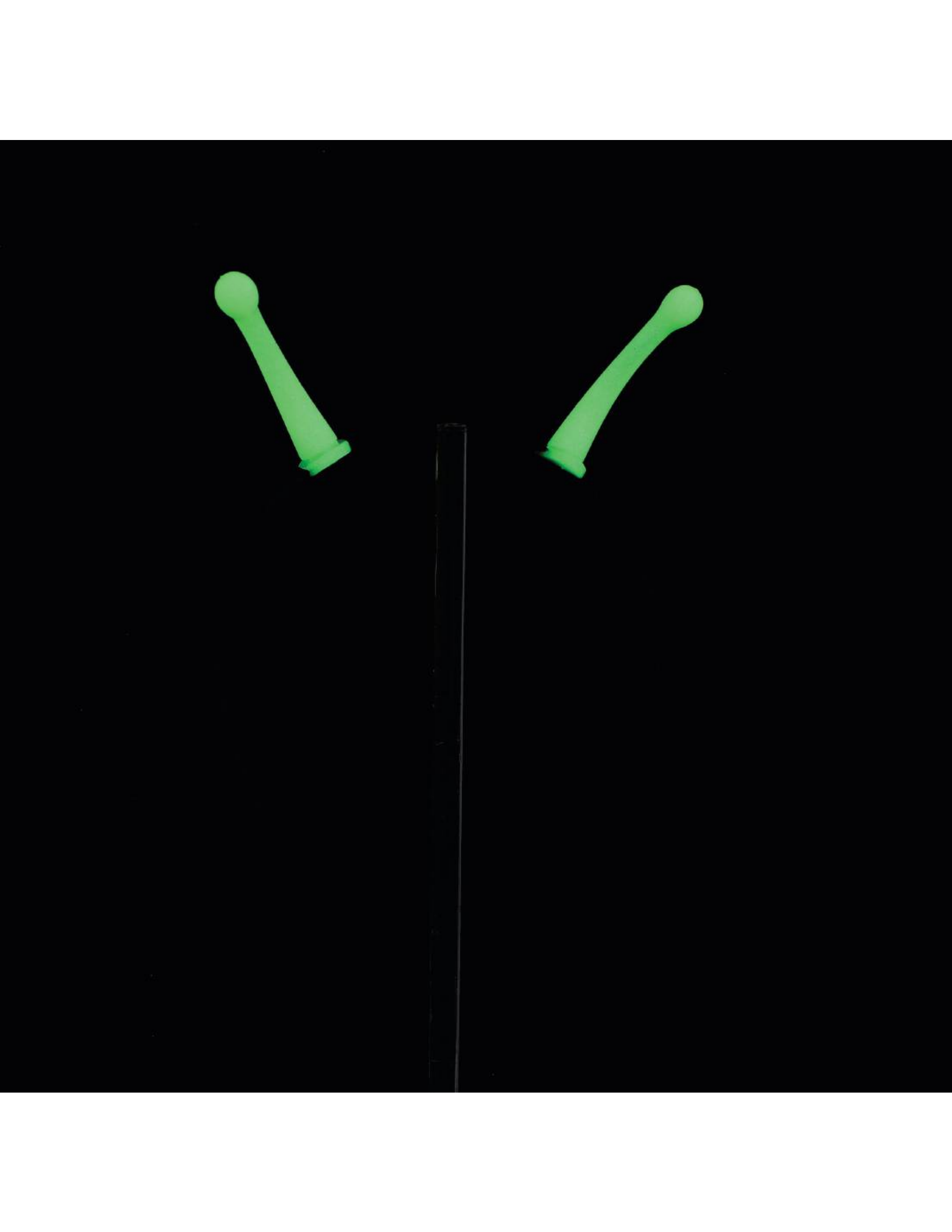












Registration #: VA0002497331
Service Request #: 1-15143846803

Mail Certificate

Xingyi Tao
10685-B Hazelhurst Dr. #29808
Houston, TX 77043 United States

Priority: Special Handling

Application Date: April 20, 2026

Correspondent

Name: Xingyi Tao
Email: taoxingyi@daoleerlaw.com
Address: 10685-B Hazelhurst Dr. #29808
Houston, TX 77043 United States

Registration Number

VA 2-497-331

Effective Date of Registration:

April 20, 2026

Registration Decision Date:

April 20, 2026

Copyright Registration for a Group of Published Photographs

Registration issued pursuant to 37 C.F.R. § 202.4(i)

For Photographs Published: February 24, 2025 to February 24, 2025

Title

Title of Group: Straw Hat Glass Aroma Dish
Number of Photographs in Group: 10

- **Individual Photographs:** Straw Hat Glass Aroma Dish 1,
Straw Hat Glass Aroma Dish 2,
Straw Hat Glass Aroma Dish 3,
Straw Hat Glass Aroma Dish 4,
Straw Hat Glass Aroma Dish 5,
Straw Hat Glass Aroma Dish 6,
Straw Hat Glass Aroma Dish 7,
Straw Hat Glass Aroma Dish 8,
Straw Hat Glass Aroma Dish 9,
Straw Hat Glass Aroma Dish 10

Published: February 2025

Completion/Publication

Year of Completion: 2025
Earliest Publication Date in Group: February 24, 2025
Latest Publication Date in Group: February 24, 2025
Nation of First Publication: United States

Author

- **Author:** UNION IMAGINATION TECHNOLOGY LIMITED
Author Created: photographs
Work made for hire: Yes
Citizen of: Hong Kong

Copyright Claimant

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Rights and Permissions

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Certification

Name: Dantong Chen
Date: April 20, 2026

Copyright Office notes: Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.



















