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9

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA
12

13 Dua Lipa,

14 Plaintiff,

15 v.

16 Samsung Electronics America, Inc.;
17 Samsung Electronics Co., Ltd.; and
Does 1-10, inclusive,

18 Defendants.
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CASE NO. 2:26-cv-05019

COMPLAINT

Demand For Jury Trial

1 Plaintiff Dua Lipa (“Ms. Lipa” or “Plaintiff”), by and through her
2 undersigned attorneys, hereby brings this Complaint against Defendants Samsung
3 Electronics America, Inc. and Samsung Electronics Co., Ltd. (collectively,
4 “Samsung” or “Defendants”), as follows:

5 **NATURE OF THE ACTION**

6 1. Ms. Lipa brings this action against Samsung for copyright
7 infringement, trademark infringement, and violation of her right of publicity in
8 order to obtain redress for the massive, continuing, unauthorized commercial
9 exploitation of her valuable image and likeness by Samsung on cardboard
10 television boxes.

11 2. Ms. Lipa is a hugely successful, Grammy-award winning singer,
12 songwriter, recording and performing artist, and model. Over the last decade, Ms.
13 Lipa has created one of the most successful and recognizable artist brands in the
14 world. Her 2020 album, *Future Nostalgia*, was certified Diamond; it was the
15 number one album in the UK and peaked at number three in the United States. Her
16 2024 album, *Radical Optimism*, debuted at number one on the UK Albums Chart
17 and number two on the Billboard 200. She has toured extensively and
18 internationally, selling out stadiums across the globe, and playing hundreds of sold
19 out shows in the last several years. She has won three Grammy Awards, as well as
20 several other prestigious awards including seven Brit Awards. Ms. Lipa has been
21 prominently featured on the cover of many popular magazines, including *Time*,
22 *British GQ*, *Vogue*, *Elle*, and *Rolling Stone*.

23 3. Ms. Lipa holds highly valuable copyright, trademark and publicity
24 rights in her name, image and likeness, including in the image exploited by
25 Samsung without authorization. Ms. Lipa has developed substantial commercial
26 value in her name, image, and likeness, which she has successfully monetized
27 through brand sponsorships, endorsements, and related promotional partnerships.
28 As a direct result of such reputation, recognition, and goodwill, Ms. Lipa has

1 earned significant revenue in exchange for offering limited rights to use her name,
2 image and/or likeness in connection with such campaigns.

3 4. Reflecting the premium value of her brand identity, Ms. Lipa has
4 entered into a number of substantial commercial partnerships with highly
5 prestigious businesses, organizations, and luxury brands. Representative examples
6 of these commercial partnerships include: (i) in 2020, Ms. Lipa became a global
7 ambassador for Puma; (ii) Ms. Lipa co-created a fashion line with Donatella
8 Versace and was a brand ambassador for Versace's Fall-Winter 2021 campaign;
9 (iii) Ms. Lipa partnered with Yves Saint Laurent in connection with its "Libre"
10 perfume, and later became a global ambassador for YSL Beauty; (iv) Ms. Lipa has
11 collaborated with Porsche, Apple, Chanel, Tiffany & Co., and many other high
12 luxury and fashion houses; and (v) most recently, Ms. Lipa starred in a widely
13 marketed commercial campaign promoting the 2026 Winter Olympics in Milan,
14 and agreed to global ambassador roles with Bvlgari and Nespresso.

15 5. Defendants are companies within the umbrella of the behemoth global
16 brand "Samsung," namely, Samsung Electronics Co., Ltd. based in Korea, and its
17 United States affiliate, Samsung Electronics America, Inc. On information and
18 belief, Defendants are engaged in the manufacturing and distribution of a wide
19 range of consumer electronics, including the Infringing Products (defined below) at
20 issue in this case.

21 6. Recognizing Ms. Lipa's notoriety and goodwill, Samsung used a
22 copyrighted image of Ms. Lipa (the "DL Image") without authority or license and
23 prominently featured it on the front of cardboard boxes containing Samsung
24 manufactured televisions for retail sale (the "Infringing Products") such as the one
25 pictured below:



7. Ms. Lipa is the sole owner of the copyright in the DL image, as reflected in Copyright Registration No. VA 2-479-685.

8. Samsung mass-manufactured, distributed (or caused to be distributed) marketed, and sold in interstate commerce across the United States a vast number of its televisions in various sizes in these cardboard boxes containing the DL Image.

9. Samsung's copying and distribution of the DL Image constitutes willful copyright and trademark infringement, and a violation of Ms. Lipa's right of publicity, designed to improperly capitalize on Ms. Lipa's hard-earned success to promote and sell Samsung's products.

10. Samsung has refused to comply with Ms. Lipa's repeated demands that it cease and desist from infringing on her rights by the continued exploitation of the Infringing Products. Samsung's response has been dismissive and callous, and the Infringing Products remain on the market to this day, still being sold throughout the country in ongoing acts of willful infringement.

11. Samsung's arrogance in refusing to stop its infringement confirms its conscious disregard of Ms. Lipa's intellectual property and personal identity rights,

1 intent on monetizing its products for its own benefit by capitalizing on the implied
2 (false) association with Ms. Lipa as a sponsor of Samsung's mass-marketed
3 television sets in the boxes on which she is prominently featured.

4 12. Samsung's infringing conduct—using Ms. Lipa's assets for zero
5 consideration—makes a mockery of her hard work in establishing a successful
6 brand and has deprived her of the ability to control and monetize her assets. This
7 misconduct thus dilutes the value of her intellectual property and personal identity
8 rights in connection with legitimate brand deals and sponsorship opportunities.

9 13. For its part, Samsung has profited, and continues to profit, immensely
10 from its unauthorized use of the DL Image. On information and belief, a
11 significant portion of the televisions sold by Samsung in the United States in 2025
12 and to date bear the DL Image on their boxes, the use of which has contributed in
13 no insignificant way to the enormous revenue generated for Samsung by the sales
14 of these televisions.

15 14. Samsung is surely aware that its conduct constitutes copyright and
16 trademark infringement, and that it violates Ms. Lipa's right of publicity. Samsung
17 is a sophisticated entity that, upon information and belief, regularly negotiates,
18 executes, and enforces licensing agreements. As such, Samsung is well aware of
19 industry standards and legal requirements governing the use of third parties'
20 copyrighted materials and trademarks, and their names, images, likenesses.
21 Despite this knowledge and experience, Samsung proceeded to use and continues
22 to use the DL Image to sell its televisions without authorization, in willful
23 disregard of Ms. Lipa's rights.

24 15. Samsung's willful and deliberate misconduct has caused, and
25 continues to cause, substantial, manifest, and irreparable harm to Ms. Lipa, while
26 enriching Samsung at her expense. By this lawsuit, Ms. Lipa seeks to bring
27 Samsung's conduct to a stop and to obtain damages for Samsung's theft of her
28 intellectual and personal identity assets.

THE PARTIES

16. Dua Lipa is an individual residing outside of the United States.

17. Samsung Electronics America, Inc. (“SEA, Inc.”) is a New York corporation with its principal place of business in Englewood Cliffs, New Jersey. On information and belief, SEA, Inc. is the United States sales and marketing subsidiary of Samsung Electronics Co. Ltd., and is engaged in the business of, among other things, the manufacturing, distribution, marketing and sale of televisions and other consumer products, including the Infringing Products, throughout California, including in this judicial district.

18. Samsung Electronics Co., Ltd. (“SEC, Ltd.”) is the parent company of SEA, Inc., with its principal place of business in Seoul, Republic of Korea. On information and belief, SEC, Ltd. is, through its subsidiaries and otherwise, engaged in the business of, among other things, the manufacturing, distribution, marketing and sale of televisions and other consumer products, including the Infringing Products, through Samsung.com.

19. On information and belief, SEC, Ltd. exercises substantial control over the operations and policies of SEA, Inc. and directly participates in and influences key business decisions of SEA, Inc., including with respect to the creation, approval, licensing, and distribution of the Infringing Products. On information and belief, SEC, Ltd. has instructed SEA, Inc. to continue the sale of the Infringing Products and has refused to cease and desist from the unauthorized use of the DL Image on the Infringing Products.

20. The true names and capacities, whether individual, corporate, associate, or otherwise, of defendants sued herein as Does 1 through 10, inclusive, are unknown to Plaintiff, who sued said defendants by such fictitious names (the “Doe Defendants”). If necessary, Plaintiff will seek leave to amend this Complaint to state their true names and capacities. Plaintiff is informed and believes, and on that basis alleges, that the Doe Defendants are liable to Plaintiff as a result of their

1 participation in some or all of the acts hereinafter set forth. Samsung and the Doe
2 Defendants are referred to collectively herein as “Defendants.”

3 21. Plaintiff is informed and believes, and on that basis avers, that at all
4 times mentioned in this Complaint, each of the Defendants acted in concert with
5 each other, and was the agent, affiliate, officer, director, manager, principal, alter-
6 ego, and/or employee of the remaining Defendants, and, in doing the things
7 averred in this Complaint, was at all times acting within the course and scope of
8 such agency, affiliation, alter-ego relationship and/or employment; and actively
9 participated in or subsequently ratified and adopted, or both, each and all of the
10 acts or conducts alleged with full knowledge of all the facts and circumstances.

11 **JURISDICTION AND VENUE**

12 22. This is a civil action seeking damages and injunctive relief for
13 copyright infringement under the Copyright Act, 17 U.S.C. § 101 *et seq.*, for
14 trademark infringement under the Lanham Act, Section 43(a) *et seq.*, for violation
15 of Ms. Lipa’s right of publicity and for redress under other related common law
16 and state claims.

17 23. This Court has subject matter jurisdiction over the claims asserted
18 under the Copyright Act and the Lanham Act pursuant to 28 U.S.C. §§ 1331 and
19 1338.

20 24. This Court has supplemental jurisdiction over the remainder of
21 Plaintiff’s claims pursuant to 28 U.S.C. § 1367.

22 25. This Court has personal jurisdiction over SEA, Inc. because SEA, Inc.
23 has continuous and systematic contacts within California, which include, without
24 limitation:

25 a. SEA, Inc. is qualified to do business in California and is
26 registered as a foreign corporation with the California Secretary of State.

1 b. SEA, Inc. maintains a strong physical presence in California,
2 including maintaining an office in San Jose, California where it employs California
3 residents.

4 c. On information and belief, SEA, Inc. operates its own
5 “Samsung Experience” storefronts in California, including in Glendale.

6 d. SEA, Inc. has consented to jurisdiction in California in prior
7 actions and has previously admitted in prior filings that it regularly conducts
8 business in California. *Golden Bridge Technology, Inc. v. Apple, Inc., et al.*, Case
9 No. 5:12-cv-04882-PSG (C.D. Cal.), ECF 88 (SEA, Inc.’s Answer), ¶¶ 40-41
10 (“Samsung admits that it sells or offers for sale products in this district and derives
11 revenue from goods and services provided to consumers in the State of California
12 ... Samsung admits that this Court has personal jurisdiction over Samsung.”);
13 *Rambus, Inc. v. Samsung Electronics Co., Ltd., et al.*, Case No. 5:05-cv-02298-
14 RMW (N.D. Cal.), ECF 87, ¶ 7 (SEA, Inc.’s Answer) (“Defendants do not contest
15 personal jurisdiction in this Court.”).

16 e. SEA, Inc. has affirmatively invoked the jurisdiction of this
17 state’s courts by filing and prosecuting numerous lawsuits in California. *See, e.g.,*
18 *Samsung Electronics America, Inc. v. Samsungtonersupply.com*, Case No. 8:08-cv-
19 00234 (C.D. Cal.); *Samsung Electronics America, Inc. v. New Century Imaging,*
20 *Inc.*, Case No. 2:10-cv-00623 (C.D. Cal.); *Samsung Electronics Co., Ltd., et al. v.*
21 *Ixi Mobile (R&D) Ltd.*, Case No. 5:20-cv-004047 (N.D. Cal.).

22 f. SEA, Inc. distributes its products, including the Infringing
23 Products, throughout California to stores such as Best Buy and Target, including in
24 Los Angeles.

25 g. SEA, Inc. actively and intentionally does business in California,
26 as evidenced by its (i) brick and mortar storefronts in California; (ii) contracts and
27 other transactions it has entered in California; (iii) revenue generated from
28 California residents in connection with its goods and services sold here; and (iv)

1 advertisements and/or promotional videos that target California residents,
2 including those in Los Angeles.

3 h. SEA, Inc. has purposefully availed itself of California law and
4 could and did reasonably anticipate being brought into this Court because, among
5 other reasons, (i) it specifically targets residents of California through its
6 distribution of products, including via its brick-and-mortar location(s) and other
7 stores and distributors throughout the district; and (ii) it has engaged, and is
8 engaging in infringing conduct within the State of California and this District,
9 including by knowingly, intentionally, and repeatedly exploiting Ms. Lipa's image,
10 trademark, and copyright within this district and to California residents.

11 26. This Court has personal jurisdiction over SEC, Ltd. because SEC, Ltd.
12 has continuous and systematic contacts within the Central District of California,
13 which include, without limitation:

14 a. SEC, Ltd. operates and sells televisions and other products
15 through the website www.samsung.com, which is available throughout California.
16 The website specifically targets California residents, as evidenced by the
17 instruction on its privacy policy directing "California Residents: click here to view
18 our California Privacy statement" which expressly "applies solely to California
19 residents."

20 b. SEC, Ltd. has consented to jurisdiction in California in prior
21 actions and has previously admitted in prior filings that it regularly conducts
22 business in California. *Golden Bridge Technology, Inc. v. Apple, Inc., et al.*, Case
23 No. 5:12-cv-04882-PSG (C.D. Cal.), ECF 88 (SEC, Ltd.'s Answer), ¶¶ 40-41
24 ("Samsung admits that it sells or offers for sale products in this district and derives
25 revenue from goods and services provided to consumers in the State of California
26 ... Samsung admits that this Court has personal jurisdiction over Samsung.");
27 *Rambus, Inc. v. Samsung Electronics Co., Ltd., et al.*, Case No. 5:05-cv-02298-

1 RMW (N.D. Cal.), ECF 87, ¶ 7 (SEC, Ltd.’s Answer) (“Defendants do not contest
2 personal jurisdiction in this Court.”).

3 c. SEC, Ltd. has affirmatively invoked the jurisdiction of this
4 state’s courts by filing and prosecuting numerous lawsuits in California. *See, e.g.,*
5 *Samsung Electronics Co., Ltd., et al. v. Ixi Mobile (R&D) Ltd.*, Case No. 5:20-cv-
6 004047 (N.D. Cal.); *Samsung Electronics Co., Ltd., et al. v. Early Bird Savings, et*
7 *al.*, Case No. 3:13-cv-003105 (S.D. Cal.); *Samsung Electronics Co., Ltd. v.*
8 *Panasonic Corp., et al.*, Case No. 3:10-cv-003098 (N.D. Cal.).

9 d. SEC, Ltd. actively and intentionally does business in California,
10 as evidenced by its (i) contracts and other transactions it has entered in California;
11 (ii) revenue generated from California residents in connection with its goods and
12 services sold here through the www.samsung.com website or otherwise; and (iii)
13 advertisements and/or promotional videos that target California residents,
14 including those in Los Angeles.

15 e. SEC, Ltd. has purposefully availed itself of California law and
16 could and did reasonably anticipate being brought into this Court because, among
17 other reasons, (i) it specifically targets residents of California through its website
18 www.samsung.com, as evidenced by its California-specific privacy policy; and (ii)
19 it has been engaged and is engaging in infringing conduct within the State of
20 California and this District, including by knowingly, intentionally, and repeatedly
21 exploiting Ms. Lipa’s image, trademark, and copyright within this district and to
22 California residents and/or by directing SEA, Inc. to exploit the same.

23 27. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b), (c)
24 and/or § 1400(a).

FACTS APPLICABLE TO ALL CLAIMS

28. Ms. Lipa is the owner of all rights, title and interest in the image titled “Dua Lipa - Backstage at Austin City Limits, 2024” (the “DL Image”):



29. The DL Image features Ms. Lipa, backstage at the Austin City Limits Festival, before going on stage. It is registered with the United States Copyright Office, bearing Registration No. VA 2-479-685.

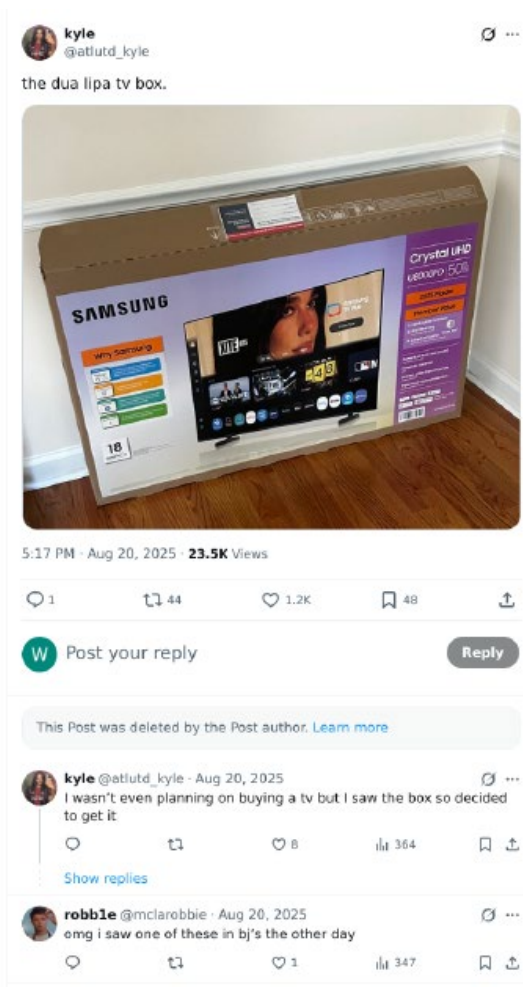
30. Ms. Lipa also holds highly valuable commercial publicity rights and trademark rights in her image, both of which are highlighted in the DL Image.

31. Samsung exploited Ms. Lipa’s carefully curated and extremely valuable brand identity to sell televisions, by using, without authorization, Ms. Lipa’s copyrighted image on the front of cardboard boxes offering Samsung televisions for sale (the “Infringing Products”). Ms. Lipa’s face was prominently used for a mass marketing campaign for a consumer product without her knowledge, without consideration, and as to which she had no say, control, or input whatsoever. Ms. Lipa did not allow and would not have allowed this use.

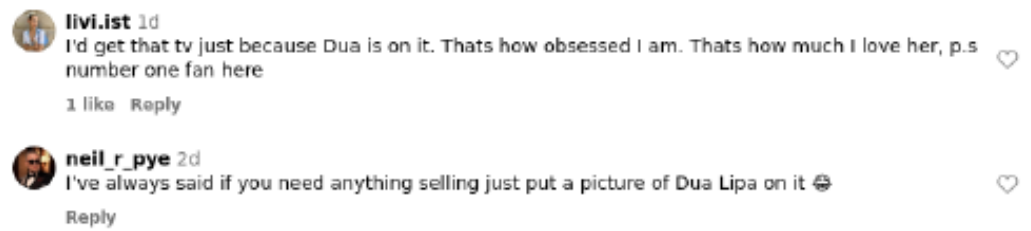
32. Samsung did not have, and does not have, any license, authorization, permission, or consent to use the DL Image, or Ms. Lipa's brand, image, or likeness, on the Infringing Products, and it is well aware that it has no such right.

33. Samsung has benefitted substantially from the unauthorized copying and distribution of the DL Image on its Infringing Products. The substantial revenue that it has made on the sale of the Infringing Products is inextricably tied to the false message conveyed to consumers that Ms. Lipa has endorsed the Infringing Products when she has not.

34. On information and belief, and as reflected in social media postings, the use of the DL Image on the Infringing Products induced potential consumers to buy them because it featured Ms. Lipa, with one fan noting "I wasn't even planning on buying a tv but I saw the box so I decided to get it":



35. Indeed, another fan commented that they would “get that tv just because Dua is on it.” Yet another aptly noted, “if you need anything selling just put a picture of Dua Lipa on it.”



1 36. Ms. Lipa became aware of Samsung's infringement and violation of
2 her right of publicity in or about June 2025, and immediately demanded that
3 Samsung cease and desist from the infringement.

4 37. Samsung has repeatedly refused to do so, and instead has continued to
5 willfully, intentionally, and purposefully infringe on Ms. Lipa's rights for its
6 financial benefit, maintaining for sale the Infringing Products bearing the DL
7 Image.

8 38. Ms. Lipa has developed substantial commercial value in her name,
9 image, and likeness, which she has successfully monetized through brand
10 sponsorships, endorsements, and related promotional partnerships. As a direct
11 result of this reputation, recognition, and goodwill, Ms. Lipa has earned—and
12 continues to earn—significant revenue in exchange for limited rights to use her
13 image and likeness in connection with such campaigns.

14 39. Ms. Lipa is highly selective in her commercial partnerships and has
15 cultivated a premium brand through carefully curated, high-end sponsorships and
16 endorsements. Consistent with this deliberate strategy, Plaintiff would not have
17 agreed to license her name, image or likeness in connection with the sale of the
18 Infringing Products.

19 40. Samsung's unauthorized use of the DL Image has thus caused and
20 continues to cause dilution of Plaintiff's valuable brand identity and commercial
21 goodwill by falsely conveying to the consuming public that she approves of and
22 endorses the Infringing Products.

23 **FIRST CAUSE OF ACTION**

24 **COPYRIGHT INFRINGEMENT**

25 **(Against All Defendants)**

26 41. Plaintiff incorporates by this reference each and every averment
27 contained in Paragraphs 1 through 40, inclusive, as though fully set forth herein.

1 42. Plaintiff is the owner of all rights, title, and interest in the DL Image,
2 which has been registered with the United States Copyright Office, bearing
3 Registration No. VA 2-479-685.

4 43. Defendants have infringed, and are continuing to infringe, Plaintiff's
5 copyright interests in the DL Image by reproducing, distributing, and/or displaying
6 the DL Image on the Infringing Products without authorization, in violation of the
7 Copyright Act, 17 U.S.C. §§106 and 501.

8 44. Each such infringement by Defendants of the DL Image is a separate
9 and distinct act of infringement.

10 45. Defendants' acts of infringement are willful, intentional, and
11 purposeful, in disregard of and with complete indifference to Plaintiff's rights.

12 46. As a direct and proximate result of Defendants' willful infringement,
13 Plaintiff is entitled to damages and to Defendants' profits attributable to the
14 infringement, in an amount to be proven at trial, and which are not currently
15 ascertainable.

16 47. Plaintiff is additionally entitled to recover her full costs incurred in
17 this action pursuant to 17 U.S.C. § 505.

18 48. As a direct and proximate result of Defendants' acts and conduct,
19 Plaintiff has sustained and will continue to sustain substantial, immediate and
20 irreparable injury, for which there is no adequate remedy at law. Plaintiff is
21 informed and believes, and on that basis avers, that unless enjoined by this Court,
22 Defendants will continue to infringe her rights in the DL Image. Plaintiff is
23 entitled to permanent injunctive relief to restrain and enjoin Defendants'
24 continuing infringing conduct.

SECOND CAUSE OF ACTION

VICARIOUS COPYRIGHT INFRINGEMENT

(Pled in the Alternative against SEC, Ltd.)

49. Plaintiff incorporates by this reference each and every averment contained in Paragraphs 1 through 48, inclusive, as though fully set forth herein.

50. Plaintiff is the owner of all rights, title, and interest in the DL Image, which has been registered with the United States Copyright Office, as set forth above.

51. Defendants have directly and willfully infringed Plaintiff's copyrights in the DL Image through their unauthorized reproduction, distribution and/or display of the DL Image on the Infringing Products. Additionally, or alternatively, on information and belief, SEC, Ltd. is vicariously liable for the infringing acts of Defendants due to its substantial control over and direct participation and influence over key business decisions of its subsidiary SEA, Inc., including with respect to the creation, approval, licensing, and distribution of the Infringing Products. On information and belief, officers of SEC, Ltd. have instructed SEA, Inc. to continue the sale of the Infringing Products and have refused to cease and desist from the unauthorized use of the DL Image on the Infringing Products.

52. Each underlying infringement by Defendants of the DL Image is a separate and distinct act of infringement.

53. On information and belief, SEC, Ltd. had the right, authority and ability to control the infringing activities of Defendants, including the sale and distribution of the Infringing Products.

54. On information and belief, SEC, Ltd. derived a direct financial benefit from the infringement and has profited from Defendants' infringement of the DL Image.

55. SEC, Ltd.'s acts of infringement were knowing, willful, and in disregard of and with indifference to Plaintiff's rights.

56. Thus, because of SEC, Ltd.'s dominion and control of SEA, Inc., as well as the direct financial benefit SEC, Ltd. receives by virtue of the acts alleged herein, SEC, Ltd. is liable for vicarious copyright infringement.

57. As a direct and proximate result of SEC, Ltd.'s vicarious infringement of Plaintiff's copyright in the DL Image, Plaintiff is entitled to damages, and any profits of SEC, Ltd. that are attributable to the infringement, in an amount to be proven at trial, and which are not currently ascertainable.

58. Plaintiff is additionally entitled to recover her full costs incurred in this action pursuant to 17 U.S.C. § 505.

59. As a direct and proximate result of SEC, Ltd.'s acts and conduct, Plaintiff has sustained and will continue to sustain substantial, immediate, and irreparable injury, for which there is no adequate remedy at law. Plaintiff is informed and believes, and on that basis avers, that unless enjoined by this Court, SEC, Ltd. will continue to infringe her rights in the DL Image. Plaintiff is entitled to permanent injunctive relief to restrain and enjoin SEC, Ltd.'s continuing infringing conduct.

THIRD CAUSE OF ACTION

FALSE ENDORSEMENT AND TRADEMARK INFRINGEMENT

(Lanham Act § 43(a), 15 U.S.C. § 1125(a))

(Against All Defendants)

60. Plaintiff incorporates by this reference each and every averment contained in Paragraphs 1 through 59, inclusive, as though fully set forth herein.

61. Plaintiff holds valid and protectable trademark rights in her brand, image, and likeness, as contained in the DL Image, which are inherently distinctive and recognizable to consumers.

62. Defendants' unauthorized use of the DL Image, as described above, constitutes false endorsement and trademark infringement of Plaintiff's trademark rights in her brand, image, and likeness in violation of 15 U.S.C. § 1125(a).

1 63. Defendants' unauthorized use of the DL Image has caused, and is
2 likely to continue to cause, confusion, mistake, or deception as to Plaintiff's
3 sponsorship of the Infringing Products. Consumers have believed and will
4 continue to mistakenly believe that Plaintiff endorses, approves, recommends, or is
5 affiliated or associated with the Infringing Products as a direct result of
6 Defendants' unauthorized use of the DL Image.

7 64. Defendants' wrongful acts have permitted and will permit Defendants
8 to receive substantial profits based on the strength of Plaintiff's reputation and the
9 substantial goodwill she has built in her brand, image, and likeness.

10 65. As a direct and proximate result of Defendants' infringement, Plaintiff
11 has been damaged and will continue to be damaged. Plaintiff is entitled to
12 damages for the unlawful use of her brand and image, and to Defendants' profits in
13 an amount to be proven at trial, and which is not currently ascertainable.

14 66. Defendants knew of Plaintiff's rights, and their infringement has been
15 knowing, willful, and deliberate, such that the Court should award Plaintiff her
16 attorneys' fees pursuant to 15 U.S.C. § 1117. Plaintiff is also entitled to the costs
17 of this action.

18 67. On information and belief, unless an injunction is issued enjoining
19 any continuing or future use of the DL Image by Defendants, such use is likely to
20 continue to cause confusion and Plaintiff will continue to sustain substantial and
21 irreparable harm, for which there is no adequate remedy at law. Plaintiff is thus
22 entitled to permanent injunctive relief to restrain and enjoin Defendants'
23 continuing infringing conduct.

FOURTH CAUSE OF ACTION
TRADEMARK INFRINGEMENT
(Common Law)
(Against All Defendants)

68. Plaintiff incorporates by this reference each and every averment contained in Paragraphs 1 through 67, inclusive, as though fully set forth herein.

69. Plaintiff holds valid and protectable common law trademark rights in her brand, image, and likeness, which are inherently distinctive and recognizable to consumers.

70. Defendants' unauthorized use of the DL Image, as described above, constitutes infringement of Plaintiff's common law trademark rights in her brand, image, and likeness.

71. Defendants' unauthorized use of the DL Image has caused, and is likely to continue to cause, confusion, mistake, or deception as to Plaintiff's sponsorship of the Infringing Products. Consumers have believed and will continue to mistakenly believe that Plaintiff endorses, approves, recommends, or is affiliated or associated with the Infringing Products as a direct result of Defendants' unauthorized use of the DL Image.

72. Defendants' wrongful acts have permitted and will permit Defendants to receive substantial profits based on the strength of Plaintiff's reputation and the substantial goodwill she has built up in her brand, image, and likeness.

73. As a direct and proximate result of Defendants' infringement, Plaintiff has been damaged and will continue to be damaged. Plaintiff is entitled to damages for the unlawful use of her brand and image, and to Defendants' profits in an amount to be proven at trial, and which are not currently ascertainable.

74. On information and belief, unless an injunction is issued enjoining any continuing or future use of the DL Image by Defendants, such use is likely to continue to cause confusion and Plaintiff will continue to sustain substantial and

1 irreparable harm, for which there is no adequate remedy at law. Plaintiff is thus
 2 entitled to permanent injunctive relief to restrain and enjoin Defendants'
 3 continuing infringing conduct.

4 75. Defendants have acted willfully, intentionally and maliciously, in
 5 direct violation of and with complete indifference to Plaintiff's rights. Therefore,
 6 Plaintiff is entitled to an award of punitive damages as a result of Defendants'
 7 infringement.

8 **FIFTH CAUSE OF ACTION**
 9 **CONTRIBUTORY TRADEMARK INFRINGEMENT**
 10 **(Lanham Act and Common Law)**
 11 **(Pled in the Alternative against SEC, Ltd.)**

12 76. Plaintiff incorporates by this reference each and every averment
 13 contained in Paragraphs 1 through 75, inclusive, as though fully set forth herein.

14 77. Defendants have directly and willfully infringed Plaintiff's trademark
 15 rights in her name, image, and likeness through its use of the DL Image in
 16 connection with the sale of the Infringing Products, which has caused, and is likely
 17 to cause, mistake, or confuse or deceive the general public as to the endorsement,
 18 affiliation, connection or association of Plaintiff with the Infringing Products, as
 19 set forth above.

20 78. Alternatively, on information and belief, SEC, Ltd. had knowledge of,
 21 controlled, authorized, directly participated in, intentionally induced and materially
 22 contributed to the infringement of Plaintiff's trademark rights by Defendants by,
 23 among other things, participating and influencing key business decisions of its
 24 subsidiary SEA, Inc., including with respect to the creation, approval, licensing,
 25 and distribution of the Infringing Products. On information and belief, officers of
 26 SEC, Ltd. have also instructed SEA, Inc. to continue the sale of the Infringing
 27 Products and have refused to cease and desist from the unauthorized use of the DL
 28 Image on the Infringing Products.

1 79. SEC, Ltd. knew or should have known of the infringement of
2 Plaintiff's trademark rights. At a minimum, SEC, Ltd. was put on notice of the
3 infringement by Plaintiff, and therefore has actual knowledge of the continuing
4 infringement.

5 80. On information and belief, SEC, Ltd. had the right and ability to
6 control the actions of Defendants and stop the distribution of the Infringing
7 Products.

8 81. On information and belief, SEC, Ltd. has profited from Defendants'
9 infringement of Plaintiff's trademark rights in her name, image, and likeness.

10 82. The aforesaid acts of SEC, Ltd. constitutes contributory trademark
11 infringement in violation of Sections 32(1) and 43(a) of the Lanham Act and
12 California common law.

13 83. As a direct and proximate result of SEC, Ltd.'s infringement, Plaintiff
14 has been damaged and will continue to be damaged. Plaintiff is entitled to
15 damages for the unlawful use of her brand, image, and likeness, and to SEC, Ltd.'s
16 profits in an amount to be proven at trial, and which are not currently ascertainable.

17 84. As a direct and proximate result of SEC, Ltd.'s acts and conduct,
18 Plaintiff has sustained and will continue to sustain substantial, immediate, and
19 irreparable injury, for which there is no adequate remedy at law. Plaintiff is
20 informed and believes, and on that basis avers, that unless enjoined by this Court,
21 SEC, Ltd. will continue to infringe her trademark rights. Plaintiff is entitled to
22 permanent injunctive relief to restrain and enjoin SEC, Ltd.'s continuing infringing
23 conduct.

24 85. SEC, Ltd. knew of Plaintiff's rights, and its infringement has been
25 knowing, willful, and deliberate, such that the Court should award Plaintiff her
26 attorneys' fees pursuant to 15 U.S.C. § 1117. Plaintiff is also entitled to her costs
27 of this action.

SIXTH CAUSE OF ACTION
VICARIOUS TRADEMARK INFRINGEMENT
(Lanham Act and Common Law)
(Pled in the Alternative against SEC, Ltd.)

86. Plaintiff incorporates by this reference each and every averment contained in Paragraphs 1 through 85, inclusive, as though fully set forth herein.

87. Defendants have directly and willfully infringed Plaintiff's trademark rights in her name, image, and likeness through its use of the DL Image in connection with the sale of the Infringing Products, which has caused, and is likely to cause, mistake, or confuse or deceive the general public as to the endorsement, affiliation, connection or association of Plaintiff with the Infringing Products, as set forth above.

88. Additionally, or alternatively, on information and belief, SEC, Ltd. is vicariously liable for the infringing acts of Defendants because at all relevant times, including in connection with the development and distribution of the Infringing Products, SEA, Inc. was acting as SEC, Ltd.'s agent and within the scope of its authority as an agent of SEC, Ltd. On information and belief, SEA, Inc. and SEC, Ltd. exercise joint ownership and control over the Infringing Products.

89. On information and belief, SEC, Ltd. had, and continues to have, substantial control over and direct participation and influence over key business decisions of its subsidiary and agent SEA, Inc., including with respect to the creation, approval, licensing, and distribution of the Infringing Products.

90. SEC, Ltd. knew or should have known of the infringement of Plaintiff's trademark rights. At a minimum, SEC, Ltd. was put on notice of the infringement by Plaintiff, and therefore has actual knowledge of the continuing infringement. On information and belief, officers of SEC, Ltd. have instructed

1 SEA, Inc. to continue the sale of the Infringing Products and have refused to cease
2 and desist from the unauthorized use of the DL Image on the Infringing Products.

3 91. On information and belief, SEC, Ltd. has profited from SEA, Inc.'s
4 infringement of Plaintiff's trademark rights in her name, image, and likeness.

5 92. The aforesaid acts of SEC, Ltd. constitutes vicarious trademark
6 infringement.

7 93. As a direct and proximate result of SEC, Ltd.'s infringement, Plaintiff
8 has been damaged and will continue to be damaged. Plaintiff is entitled to
9 damages for the unlawful use of her brand, image, and likeness, and to SEC, Ltd.'s
10 profits in an amount to be proven at trial, and which are not currently ascertainable.

11 94. As a direct and proximate result of SEC, Ltd.'s acts and conduct,
12 Plaintiff has sustained and will continue to sustain substantial, immediate, and
13 irreparable injury, for which there is no adequate remedy at law. Plaintiff is
14 informed and believes, and on that basis avers, that unless enjoined by this Court,
15 SEC, Ltd. will continue to infringe her trademark rights. Plaintiff is entitled to
16 permanent injunctive relief to restrain and enjoin SEC, Ltd.'s continuing infringing
17 conduct.

18 95. SEC, Ltd. knew of Plaintiff's rights, and its infringement has been
19 knowing, willful, and deliberate, such that the Court should award Plaintiff her
20 attorneys' fees pursuant to 15 U.S.C. § 1117. Plaintiff is also entitled to the costs
21 of this action.

22 **SEVENTH CAUSE OF ACTION**

23 **VIOLATION OF RIGHT OF PUBLICITY**

24 **(Cal. Civ. Code § 3344)**

25 **(Against All Defendants)**

26 96. Plaintiff incorporates by this reference each and every averment
27 contained in Paragraphs 1 through 95, inclusive, as though fully set forth herein.

1 97. Plaintiff is the owner of the rights of publicity in her identity, persona,
2 image, and likeness.

3 98. Defendants have willfully and knowingly used, and continue to use,
4 the DL Image featuring Plaintiff's likeness on the Infringing Products for the
5 commercial purposes of advertising, selling, or soliciting purchases of the
6 Infringing Products, without Plaintiff's authorization.

7 99. Plaintiff is informed and believes, and on that basis avers, that the
8 Infringing Products are distributed and sold throughout the United States, including
9 in the State of California.

10 100. Defendants' unauthorized use of Plaintiff's image and likeness for
11 commercial purposes, as averred herein, constitutes a violation of Plaintiff's
12 statutory right of publicity as set forth in California Civil Code § 3344.

13 101. As a direct and proximate result of Defendants' wrongful conduct,
14 Plaintiff has suffered, and will continue to suffer, damages in an amount to be
15 proven at trial. Plaintiff is entitled to damages for the unlawful use of her image
16 and likeness, and to Defendants' profits in an amount to be proven at trial, and
17 which are not currently ascertainable.

18 102. Plaintiff is additionally entitled to recover her full costs and attorneys'
19 fees incurred in this action pursuant to California Civil Code § 3344(a).

20 103. Defendants have acted willfully, maliciously, in direct violation of
21 and with complete indifference to Plaintiff's rights. Therefore, Plaintiff is
22 additionally entitled to an award of punitive damages.

23 104. On information and belief, unless an injunction is issued enjoining
24 any continuing or future use of the DL Image by Defendants, such use is likely to
25 continue and Plaintiff will continue to sustain substantial and irreparable harm, for
26 which there is no adequate remedy at law. Plaintiff is thus entitled to permanent
27 injunctive relief to restrain and enjoin Defendants' continuing wrongful conduct.

EIGHTH CAUSE OF ACTION
VIOLATION OF RIGHT OF PUBLICITY
(Common Law)
(Against All Defendants)

105. Plaintiff incorporates by this reference each and every averment contained in Paragraphs 1 through 104, inclusive, as though fully set forth herein.

106. Plaintiff is the owner of the common law rights of publicity in her identity, persona, image, and likeness.

107. Defendants have willfully and knowingly used and continue to use the DL Image featuring Plaintiff's likeness on the Infringing Products for the commercial purposes of advertising, selling, or soliciting purchases of the Infringing Products, without Plaintiff's authorization.

108. Plaintiff is informed and believes, and on that basis avers, that the Infringing Products are distributed and sold throughout the United States, including in the State of California.

109. Defendants' unauthorized use of Plaintiff's image and likeness for commercial purposes and commercial advantage, as averred herein, constitutes an invasion and violation of Plaintiff's right of publicity under common law.

110. As a direct and proximate result of Defendants' wrongful conduct, Plaintiff has suffered, and will continue to suffer, damages in an amount to be proven at trial. Plaintiff is entitled to damages for the unlawful use of her image and likeness, and to Defendants' profits in an amount to be proven at trial, and which are not currently ascertainable.

111. Defendants have acted willfully, maliciously, in direct violation of and with complete indifference to Plaintiff's rights. Therefore, Plaintiff is additionally entitled to punitive damages.

112. On information and belief, unless an injunction is issued enjoining any continuing or future use of the DL Image by Defendants, such use is likely to

1 continue and Plaintiff will continue to sustain substantial and irreparable harm, for
 2 which there is no adequate remedy at law. Plaintiff is thus entitled to permanent
 3 injunctive relief to restrain and enjoin Defendants' continuing wrongful conduct.

4 **PRAYER FOR RELIEF**

5 WHEREFORE, Plaintiff prays for judgment against Defendants, as follows:

- 6 1. For a permanent injunction prohibiting Defendants, and their
 7 respective representatives, agents, servants, directors, officers,
 8 principals, employees, representatives, subsidiaries and affiliated
 9 companies, successors, assigns, and those acting in concert with
 10 Defendants or at their direction from directly or indirectly infringing
 11 and/or misappropriating Plaintiff's copyright, trademark and publicity
 12 rights in the DL Image in any manner, including, without limitation,
 13 by directly or indirectly copying, distributing, displaying, or otherwise
 14 exploiting the DL Image and/or Plaintiff's image and likeness in any
 15 manner.
- 16 2. For an award of Plaintiff's actual damages arising from Defendants'
 17 copyright infringement, trademark infringement and misappropriation
 18 of Plaintiff's likeness and image in such amount as may be
 19 determined at trial, but no less than \$15 million, and Defendants'
 20 profits attributable to their unauthorized use of the DL Image and
 21 Plaintiff's image and likeness;
- 22 3. For an award of punitive damages, in such amount as may be
 23 determined at trial;
- 24 4. For attorneys' fees and costs in this action;

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27 ///

28 ///

5. Pre- and post-judgment interest to the extent allowable; and
6. Such other and further relief that the Court may deem just and proper.

DATED: MAY 8, 2026

CHRISTINE LEPERA
GABRIELLA N. ISMAJ
ALEXANDRA L. ANFUSO
MITCHELL SILBERBERG & KNUPP LLP

By: /s/ Gabriella N. Ismaj

Christine Lepera
Gabriella N. Ismaj
Alexandra L. Anfuso
Attorneys for Plaintiff Dua Lipa

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury on all matters and issues so triable.

DATED: MAY 8, 2026

CHRISTINE LEPERA
GABRIELLA N. ISMAJ
ALEXANDRA L. ANFUSO
MITCHELL SILBERBERG & KNUPP LLP

By: /s/ Gabriella N. Ismaj

Christine Lepera
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Attorneys for Plaintiff Dua Lipa