

HON. RICARDO S. MARTINEZ

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DALI-USA, Inc., a Washington corporation,

Plaintiff,

vs.

ILONA KUCHERENKO, a person of unknown origin, d/b/a AUDIOPHILE LIQUIDATOR; and JOHN DOES 1-5, persons or entities of unknown origin,

Defendants.

NO. 2:06-CV-01811-RSM

FIRST AMENDED COMPLAINT

JURY DEMAND

DALI-USA, INC., a Washington corporation, upon personal information as to its own activities, and upon information and belief as to the activities of others, hereby alleges for its complaint against Ilona Kucherenko ("*Kucherenko*"), and John Does (1-5) ("*John Does*"), as follows:

I. NATURE OF THE CASE

1.1. This is an action for trademark and copyright infringement.

1.2. Plaintiff DALI-USA, Inc. ("*DALI*") is an indirect subsidiary, and exclusive United States licensee, of AudioNord Danmark, owner of the valuable DALI™ trademark for home audio goods and services. DALI also owns the copyrights in photographs of its products and the descriptions and specifications of those products.

1 marketing materials are crafted in a manner that accentuates the features of the
2 products, consistent with the overall marketing message.

3 4.7. DALI owns the copyrights in the Materials, and licenses the Materials
4 to authorized dealers and distributors. True and correct copies of copyright
5 registrations in the Materials are attached hereto as *Exhibit A*.

6 **B. Acts of Infringements Perpetrated Via the Infringing Sites**

7 4.8. In 2006, DALI began receiving complaints from customers and
8 authorized distributors regarding various web sites which purported to offer DALI
9 products at heavily discounted prices (the Infringing Sites).

10 4.9. Numerous customers have complained to DALI and DALI's authorized
11 distributors that they ordered the DALI products advertised on the Infringing Sites
12 only to have the Infringing Sites either ship a replacement non-DALI product, or
13 "suggest an alternative".

14 4.10. Dealers have similarly complained that customers have inquired with
15 them as to the availability of DALI products at the pricing listed on the Infringing
16 Sites when no such products are offered at the Infringing Sites (either at that price
17 or otherwise).

18 4.11. In short, the Infringing Sites do not actually offer DALI products, but
19 advertise that they do.

20 4.12. The Infringing Sites all appear to be operated by the same individuals.
21 The Infringing Sites contain the name "Audiophile Liquidator" (or some variant) in
22 their text somewhere, and sell virtually the same products.

23 4.13. The Infringing Sites do not list a street address anywhere on the
24 Infringing Sites.

25 4.14. The domain names (the "*Infringing Domains*") through which the
26 Infringing Sites are made available are all registered to Kucherenko. The
27 Infringing Domains were registered on an anonymous basis by Kucherenko through
28

1 “proxy registration services” provided by Domains By Proxy, Inc. (“DBP”).²

2 4.15. Screenshots of one of the Infringing Sites, which purports to offer
3 DALI products are attached hereto as *Exhibit B*.

4 4.16. Defendants used, and continue to use, DALI’s trademarked and
5 copyrighted materials (the Mark and the Materials) in the context of a classic “bait
6 and switch” scheme.

7 4.16. The Infringing Sites are not operated by authorized retailers of DALI
8 products, and do not have a license to use the Mark or the Materials.

9 4.17. In engaging in this bait and switch scheme, Defendants materially
10 injured, and continue to injure, DALI’s brand and goodwill in the Mark, and its
11 rights in the Materials.

12
13 **V. FIRST CAUSE OF ACTION:
FALSE DESIGNATION OF ORIGIN AND UNFAIR COMPETITION
14 (15 U.S.C. § 1125)**

15 5.1. DALI incorporates the allegations set forth in paragraphs 1.1 through
16 4.17 above as though fully set forth herein.

17 5.2. By their use of the DALI™ Mark on the Infringing Sites, Defendants
18 used and continue to use DALI™ as a false designation of origin in such a manner
19 which is likely to cause confusion, or to cause mistake, or to deceive as to the
20 affiliation, connection, or association of Defendants with DALI.

21 5.3. By their use of the DALI™ Mark, Defendants used and continue to use
22 DALI™ as a false designation of origin in such a manner which is likely to cause
23 confusion, or to cause mistake, or to deceive as to the origin, sponsorship, or
24 approval of Defendants’ goods or services, or commercial activities, by DALI.

25 5.4. Defendants’ actions violate DALI’s rights under 15 U.S.C. § 1125(a).

26 5.5. Defendants’ actions, as described herein, caused, and continue to

27
28

² Dali originally named DBP as a party. DBP divulged the identity of the registrant for all of the Infringing Domains (Kucherenko) and placed the Infringing Domains on hold. Consequently, DBP is no longer named as a party in the lawsuit.

1 cause, substantial damages to DALI and its interest in the Mark.

2
3 **VI. SECOND CAUSE OF ACTION:**
4 **FALSE ADVERTISING**
5 **(15 U.S.C. § 1125)**

6 6.1. DALI incorporates the allegations set forth in paragraphs 1.1 through
7 5.5 above as though fully set forth herein.

8 6.2. Defendants made false or misleading statements (via the Infringing
9 Sites) regarding DALI and its products and services, and regarding the Mark.

10 6.3. Defendants' statements actually deceive or are likely to deceive a
11 substantial segment of the advertisement's audience.

12 6.4. Defendants' statements concerned a subject material to the decision of
13 consumers to purchase the goods.

14 6.5. Defendants' statements relate to goods and services entering interstate
15 commerce.

16 6.6. Defendants' statements resulted in actual or probable injury to DALI.
17 The statements violate DALI's rights under 15 U.S.C. § 1125.

18 **VII. THIRD CAUSE OF ACTION:**
19 **COPYRIGHT INFRINGEMENT**
20 **(17 U.S.C. § 101)**

21 7.1. DALI incorporates the allegations set forth in paragraphs 1.1 through
22 6.6 above as though fully set forth herein.

23 7.2. DALI has registered copyrights in the photographs of its products, and
24 in marketing brochures and product libraries, which are displayed on Dali's website
25 (the "*Dali Site*") and the descriptions of the products (*i.e.*, the Materials).

26 7.3. Defendants had access to the Dali Site, including the Materials.

27 7.4. Defendants copied and/or created derivative works of the photographs
28 and the Materials.

7.5. Defendants are not licensed or authorized by DALI to use Dali's
copyrighted materials.

1 9.4. Defendants' actions affect the public interest – there is a strong public
2 interest in a marketplace which is free of misleading information. Defendants'
3 actions contravene this public interest.

4 9.5. DALI has been injured in its business or property as a result of
5 Defendants' actions. Defendants' misappropriates DALI's goodwill and customer
6 base.

7 9.6. Defendants' actions caused DALI's injury.

8 9.7. Pursuant to RCW § 19.86.090, therefore, DALI is entitled to actual
9 damages in amount to be factually determined, treble damages, and costs of suit,
10 including reasonable attorneys' fees.

11 X. JURY DEMAND

12 Pursuant to Federal Rule of Civil Procedure Rule 38(b), DALI demands a
13 trial by jury as to all issues so triable in this action.

14 XI. RELIEF REQUESTED

15 WHEREFORE, DALI prays for the following relief:

16 1. Injunctive Relief That this Court grant an injunction enjoining and
17 restraining Defendants, as well as their partners, agents, servants, employees, and
18 attorneys, and those persons in active concert or participation with them who
19 receive actual notice of the order by personal service or otherwise from: (1) directly
20 or indirectly using the Mark, or any other trademark or any other mark, symbol,
21 device, word, domain name, fictitious business name, or name similar to the Mark
22 (DALI™) which is likely to cause confusion or in a manner that violates DALI's
23 rights under the Lanham Act; (2) reproducing, displaying, broadcasting,
24 distributing, performing, or taking any other action reserved for the copyright
25 owner of any of the Materials; and (3) continuing any and all acts of unfair
26 competition as herein alleged.

27 2. Money Damages in the Amount of the Losses of DALI. That
28 Defendants be required to pay DALI for all damages sustained by DALI by reason

1 of Defendants' improper acts complained herein.

2 3. Money Damages in the Amount of the Profits of Defendants. That
3 Defendants be required to pay DALI for all revenue Defendants or their agents or
4 licensees generated by reason of Defendants' improper acts complained herein.

5 4. Statutory Damages. That, pursuant to the Lanham Act, and
6 Copyright Act, and Washington Consumer Protection Act, the Court award DALI
7 statutory damages (to the extent available).

8 5. Costs. That, pursuant to the Lanham Act, Copyright Act, and
9 Washington Consumer Protection Act, and the principles of equity, the Court award
10 costs of this action to DALI.

11 6. Infringing Domains. That Defendants be required to disgorge the
12 Infringing Domains to DALI.

13 7. Attorney's Fees. That, pursuant to the Lanham Act, Copyright Act,
14 and Washington Consumer Protection Act, the Court award DALI its reasonable
15 attorney's fees incurred.

16 8. Other Equitable Relief. That the Court grant such other and further
17 relief as it shall deem just.

18
19 DATED this 26th day of February, 2007.

20 **BALASUBRAMANI LAW**

21
22 By: 

23 Venkat Balasubramani (WSBA # 28269)
24 8426 40th Ave SW
25 Seattle WA, 98136
26 venkat@balasubramani.com
27 Fax: 206 260-3966

28 Attorneys for Plaintiff
DALI-USA, INC.

EXHIBIT A

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Form TX
 For a Nondramatic Literary Work
 UNITED STATES COPYRIGHT OFFICE

REGISTRATION NUMBER

TX 6-493-458



EFFECTIVE DATE OF REGISTRATION

Dec 19 2006
 Month Day Year

RATE CONTINUATION SHEET.

1 **TITLE OF THIS WORK ▼**
 DALI SPEAKER LIBRARY COPYRIGHT REGISTRATION

PREVIOUS OR ALTERNATIVE TITLES ▼

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. **Title of Collective Work ▼**

If published in a periodical or serial give: **Volume ▼** **Number ▼** **Issue Date ▼** **On Pages ▼**

2 a **NAME OF AUTHOR ▼**
 AUDIONORD

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
 Name of Country
 OR { Citizen of ► DENMARK
 Domiciled in ► DENMARK

DATES OF BIRTH AND DEATH
 Year Born ▼ Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
 If the answer to either of these questions is "Yes," see detailed instructions.
 Anonymous? Yes No
 Pseudonymous? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. **short terms - & phra**
COMPILATION OF TEXT AND DIGITAL IMAGES REPRESENTING A LIBRARY OF AUDIO SPEAKERS & ses.

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

b **NAME OF AUTHOR ▼**

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
 Name of Country
 OR { Citizen of ►
 Domiciled in ►

DATES OF BIRTH AND DEATH
 Year Born ▼ Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
 If the answer to either of these questions is "Yes," see detailed instructions.
 Anonymous? Yes No
 Pseudonymous? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

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 No

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 Name of Country
 OR { Citizen of ►
 Domiciled in ►

DATES OF BIRTH AND DEATH
 Year Born ▼ Year Died ▼

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 If the answer to either of these questions is "Yes," see detailed instructions.
 Anonymous? Yes No
 Pseudonymous? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

3 a **YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED** This information must be given in all cases. **2006** Year

b **DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK** Complete this information ONLY if this work has been published. Month ► **JANUARY** Day ► **1** Year ► **2006**
UNITED STATES Nation

4 **COPYRIGHT CLAIMANT(S)** Name and address must be given even if the claimant is the same as the author given in space 2. ▼
 DALI USA
 3957 IRONGATE ROAD
 BELLINGHAM, WA 98226

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼
 DALI USA is the exclusive US entity of AUDIONORD

APPLICATION RECEIVED
DEC 19 2006

DO NOT WRITE HERE OFFICE USE ONLY

ONE DEPOSIT RECEIVED

TWO DEPOSITS RECEIVED

DEC 19 2006

FUNDS RECEIVED

EXAMINED BY DJO

CHECKED BY

*Corrected by C.O. from phone call to Matthew Jellett on 19 Jan 2007.

CORRESPONDENCE
Yes

FOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

Yes No If your answer is "Yes," why is another registration being sought? (Check appropriate box.) ▼

- a. This is the first published edition of a work previously registered in unpublished form.
- b. This is the first application submitted by this author as copyright claimant.
- c. This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number ►

Year of Registration ►

5

DERIVATIVE WORK OR COMPILATION

Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼

Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

*compilation of digital images and short terms and phrases.

a 6

See instructions before completing this space.

b

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.
Name ▼ Account Number ▼

a 7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/Zip ▼

MATTHEW W. JELLETT, HUGHES LAW FIRM, PLLC
4164 MERIDIAN STREET, SUITE 302
BELLINGHAM, WA 98226

Area code and daytime telephone number ► 360-647-1296

Fax number ► 360-671-2489

Email ► mjellett@inventionlaw.com

CERTIFICATION* I, the undersigned, hereby certify that I am the

Check only one ►

- author
- other copyright claimant
- owner of exclusive right(s)
- authorized agent of DALI USA

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

MATT JELLETT, Esq.

Date ► DECEMBER 18, 2006

Handwritten signature ▼

8

Certificate will be mailed in window envelope to this address:

Name ▼
HUGHES LAW FIRM, PLLC

Number/Street/Apt ▼
4164 MERIDIAN STREET, SUITE 302

City/State/Zip ▼
BELLINGHAM, WA 98226

YOU MUST:
• Complete all necessary spaces
• Sign your application in space 8

SEND ALL 3 ELEMENTS IN THE SAME PACKAGE:

1. Application form
2. Nonrefundable filing fee in check or money order payable to Register of Copyrights
3. Deposit material

MAIL TO:

Library of Congress
Copyright Office
101 Independence Avenue SE
Washington, DC 20559-6222

9

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Form TX
 For a Nondramatic Literary Work
 UNITED STATES COPYRIGHT OFFICE

RE TX 6-493-456

EFFECTIVE DATE OF REGISTRATION
 Dec 19 2006
 Month Day Year

STATE CONTINUATION SHEET.

1 TITLE OF THIS WORK ▼
 DALI BROCHURE LIBRARY COPYRIGHT REGISTRATION

PREVIOUS OR ALTERNATIVE TITLES ▼

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼ Number ▼ Issue Date ▼ On Pages ▼

2 a NAME OF AUTHOR ▼
 AUDIONORD

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
 Name of Country
 OR { Citizen of ► DENMARK
 Domiciled in ► DENMARK

DATES OF BIRTH AND DEATH
 Year Born ▼ Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
 If the answer to either of these questions is "Yes," see detailed instructions.
 Anonymous? Yes No
 Pseudonymous? Yes No

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. **Text, photographs & compilation of text and artwork embodied in an Adobe PDF format**

b NAME OF AUTHOR ▼

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
 Name of Country
 OR { Citizen of ►
 Domiciled in ►

DATES OF BIRTH AND DEATH
 Year Born ▼ Year Died ▼

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3 a YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED
 2006 This information must be given in all cases. **b** DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK
 Complete this information ONLY if this work has been published. Month ► JANUARY Day ► 1 Year ► 2006
 UNITED STATES Nation

4 COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼
 DALI USA
 3957 IRONGATE ROAD
 BELLINGHAM, WA 98226

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

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APPLICATION RECEIVED
DEC 19 2006
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 TWO DEPOSITS RECEIVED
DEC 19 2006
 FUNDS RECEIVED

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EXAMINED BY DBW

CHECKED BY

*Amended by C.O. from phone call to Matthew Jellett on 19 January 2007

CORRESPONDENCE
Yes

FOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

Yes No If your answer is "Yes," why is another registration being sought? (Check appropriate box.) ▼

- a. This is the first published edition of a work previously registered in unpublished form.
- b. This is the first application submitted by this author as copyright claimant.
- c. This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number ►

Year of Registration ►

5

DERIVATIVE WORK OR COMPILATION

Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼

Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

*text, photographs and compilation of text and photographs.

a 6

See instructions before completing this space.

b

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.
Name ▼ Account Number ▼

a 7

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- author
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- authorized agent of DALI USA

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MATT JELLETT, ESQ
Handwritten signature ▼

Date ► DECEMBER 18, 2006

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4164 MERIDIAN STREET, SUITE 302

City/State/Zip ▼
BELLINGHAM, WA 98226

YOU MUST

- Complete all necessary spaces
- Sign your application in space B

SEND ALL 3 ELEMENTS IN THE SAME PACKAGE.

1. Application form
2. Nonrefundable filing fee in check or money order payable to Register of Copyrights
3. Deposit material

MAIL TO:
Library of Congress
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101 Independence Avenue SE
Washington, DC 20559-6222

9

*17 USC §508(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America



REI TX 6-493-457



EFFECTIVE DATE OF REGISTRATION

Dec 19 2006
Month Day Year

STATE CONTINUATION SHEET.

1

TITLE OF THIS WORK ▼
DALI SITE COPYRIGHT REGISTRATION

PREVIOUS OR ALTERNATIVE TITLES ▼

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼ Number ▼ Issue Date ▼ On Pages ▼

2

a NAME OF AUTHOR ▼
AUDIONORD

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR { Citizen of ► DENMARK
Domiciled in ► DENMARK

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No
If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼ *text and
COMPILATION OF TEXT AND ARTWORK EMBODIED ON A WEBSITE

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

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DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

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Domiciled in ►

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3

a YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED
2006
This information must be given in all cases.

b DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK
Month ► JANUARY Day ► 1 Year ► 2006
UNITED STATES
Complete this information ONLY if this work has been published.

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

DALI USA
3957 IRONGATE ROAD
BELLINGHAM, WA 98226

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

DALI USA is the exclusive US entity of AUDIONORD

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DEC 19 2006

ONE DEPOSIT RECEIVED

TWO DEPOSITS RECEIVED
DEC 19 2006

FUNDS RECEIVED

DO NOT WRITE HERE OFFICE USE ONLY

EXAMINED BY

CHECKED BY

*Amended by C.O. from phone call to Matthew W. Jellett on 20 Jan 2007.

CORRESPONDENCE
Yes

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COPYRIGHT
OFFICE
USE
ONLY

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b. This is the first application submitted by this author as copyright claimant.

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If your answer is "Yes," give: Previous Registration Number ►

Year of Registration ►

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DERIVATIVE WORK OR COMPILATION

Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼

a 6

See instructions before completing this space.

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Name ▼ Account Number ▼

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MATTHEW W. JELLETT, HUGHES LAW FIRM, PLLC
4164 MERIDIAN STREET, SUITE 302
BELLINGHAM, WA 98226

Area code and daytime telephone number ► 360-647-1296

Fax number ► 360-671-2489

Email ► mjellett@inventionlaw.com

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of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

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MATTHEW W. JELLETT

Date ► DECEMBER 18, 2006

Handwritten signature ▼

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	Dali Elegance 5.1 satellite System (each) silver	\$1,359.00	<input type="button" value="Buy Now!"/>
	Dali Euphonia AS2 subwoofer (each) api	\$4,229.00	<input type="button" value="Buy Now!"/>
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\$2,999.00

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Dali Euphonia AS2 subwoofer (each) ~~\$3,949.00~~
http://www.jdsupra.com/advanced_search_result.php?keywords=...
maple



Dali Euphonia CS4 Alpi (each) \$2,899.00



Dali Euphonia CS4 Cherry/Maple(SHOWN) (each) \$2,799.00



Dali Euphonia MS4 loudspeakers (pair) alpi \$6,379.00



Dali Euphonia MS4 loudspeakers (pair) cherry \$6,049.00



Dali Euphonia MS4 loudspeakers (pair) maple \$6,049.00



Dali Euphonia MS4 loudspeakers (pair) rouge \$6,379.00



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Dali Evidence 870 loudspeakers (pair) black ash \$1,969.00

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Dali Evidence C70 center speaker (each) black ash

\$549.00 **Buy Now!**



Dali Evidence C70 center speaker (each) cherry

\$549.00 **Buy Now!**



Dali Evidence C70 center speaker (each) maple

\$559.00 **Buy Now!**



Dali Helicon 300 loudspeakers (pair) cherry

\$2,109.00 **Buy Now!**



Dali Helicon 300 loudspeakers (pair) rose nut

\$2,109.00 **Buy Now!**



Dali Helicon 400 loudspeakers (pair) cherry

\$3,019.00 **Buy Now!**



Dali Helicon 400 loudspeakers (pair) rosenut

\$3,019.00 **Buy Now!**

	Dali Helicon 800 loudspeakers (pair) cherry	\$4,569.00	Buy Now!
	Dali Helicon 800 loudspeakers (pair) rosenut	\$4,569.00	Buy Now!
	Dali Helicon C200 speaker (each) cherry	\$1,359.00	Buy Now!
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	Dali Helicon S600 subwoofer (each) rosenut	\$1,549.00	Buy Now!
	Dali Helikon Phantom speaker (each) white paintable	\$809.00	Buy Now!
	Dali Helikon W200 speakers (pair) cherry	\$1,739.00	Buy Now!

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Earthquake Sound Platine Noiree (two-tone)
\$3,299.00
\$2,999.00

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Dali Helikon W200 speakers (pair) ~~\$1,729.00~~
<http://www.jdsupra.com/products/audiophile/rosenut> [Viewer.aspx?id=100000d-3ad9-4218-a8f4-398f8fc546a3](#)



Dali Ikon On-Wall speakers (pair) light oak \$669.00



Dali Ikon On-Wall speakers (pair) light walnut \$669.00



Dali Ikon Phantom speaker (each) \$339.00



Dali Ikon Sub (each) black \$699.00



Dali Ikon Sub (each) light oak \$699.00



Dali Ikon Sub (each) light walnut \$699.00



Dali Ikon Vokal One speaker (each) light oak \$279.00



Dali Ikon Vokal One speaker (each) light walnut \$279.00



Dali Ikon Vokal Two speaker (each) light oak \$419.00

	http://www.jdsupra.com/product/under-lewer.aspx?file=0000d-3ad9-4218-a8f4-398f8fc546a3 Dali Ikon1 Two speaker (each) light walnut	\$719.00	Buy Now!
	Dali Ikon1 loudspeakers (pair) light oak	\$559.00	Buy Now!
	Dali Ikon1 loudspeakers (pair) light walnut	\$559.00	Buy Now!
	Dali Ikon2 loudspeakers (pair) light oak	\$739.00	Buy Now!
	Dali Ikon2 loudspeakers (pair) light walnut	\$739.00	Buy Now!
	Dali Ikon5 loudspeakers (pair) light oak	\$949.00	Buy Now!
	Dali Ikon5 loudspeakers (pair) light walnut	\$949.00	Buy Now!
	Dali Ikon6 loudspeakers (pair) light oak	\$1,120.00	Buy Now!



[Dali Ikon6 loudspeakers \(pair\) light walnut](#) \$1,429.00

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[Dali Piano Noble loudspeakers \(pair\) aluminum](http://audiophileliquidator.com/advanced_search_result.php?keywords=Dali+Piano+Noble+loudspeakers+(pair)+aluminum) \$1,749.00

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[Dali Royal Menuet II loudspeakers \(pair\) cherry](#)

\$659.00

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Dali Royal Menuet II loudspeakers (pair) gloss black

\$699.00

Buy Now!



Dali Royal Menuet II loudspeakers (pair) gloss white

\$699.00

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Dali Royal Scepter loudspeakers (pair) cherry

\$769.00

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Dali Royal Scepter loudspeakers (pair) gloss black

\$879.00

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Dali Royal Tower loudspeakers (pair) cherry

\$909.00

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[Dali Royal Tower loudspeakers \(pair\) gloss black](#) \$1,029.00

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	Dali Royal Vocal center speaker (each) cherry	\$389.00	Buy Now!
	Dali Royal Vocal center speaker (each) gloss black	\$419.00	Buy Now!
	Dali Royal Vocal center speaker (each) gloss white	\$419.00	Buy Now!

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Sonance Virtuoso V834DR pair
~~\$1,099.00~~
\$899.00

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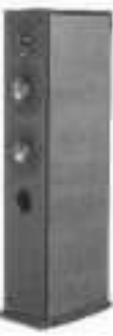
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Dali Suite 1.7 loudspeakers (pair)
[golden cherry](#) [Viewer.aspx?id=9000d-2ad9-4218-a8f4-398f8fc546a3](#) \$739.00



Dali Suite 1.7 loudspeakers (pair)
[silver](#) \$739.00



Dali Suite 2.8 loudspeakers (pair)
[golden cherry](#) \$949.00



Dali Suite C0.7 center speaker (each)
[golden cherry](#) \$329.00



Dali Suite C0.7 center speaker (each)
[silver](#) \$329.00



Dali Suite C0.8 center speaker (each)
[golden cherry](#) \$389.00





<http://www.jdsupra.com/product/index.cfm?productid=100000d-3ad9-4218-a8f4-398f8fc546a3>
Dali Suite C0.8 center speaker (each) silver

\$389.00

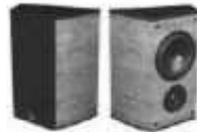
Buy Now!



Dali Suite R 0.7 speakers (pair) golden cherry

\$419.00

Buy Now!



Dali Suite R 0.7 speakers (pair) silver

\$419.00

Buy Now!



Dali Suite R 0.8 speakers (pair) golden cherry

\$459.00

Buy Now!



Dali Suite R 0.8 speakers (pair) silver

\$459.00

Buy Now!



Dali Suite Sub 1.2 (each) black

\$559.00

Buy Now!

	http://www.jdsupra.com/productviewer.asp?id=10000d-3ad9-4218-a8f4-398f8fc546a3 Dali Suite Sub 1.2 (each) golden cherry	\$559.00	Buy Now!
	Dali Suite Sub 1.2 (each) silver	\$559.00	Buy Now!
	Dali SWA-15 subwoofer (each) black	\$1,120.00	Buy Now!
	Dali SWA-15 subwoofer (each) golden cherry	\$1,120.00	Buy Now!
	Dali SWA-8 subwoofer (each) black	\$459.00	Buy Now!
	Dali SWA-8 subwoofer (each) golden cherry	\$459.00	Buy Now!

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