

1 COOLEY LLP
2 TIANA A. DEMAS (*pro hac vice forthcoming*)
3 tdemas@cooley.com
4 110 N. Wacker Drive, Suite 4200
5 Chicago, Illinois 60606-1511
6 Telephone: +1 312-881-6500
7 Facsimile: +1 312-881-6598

8 REBECCA GIVNER-FORBES (*pro hac vice forthcoming*)
9 rgf@cooley.com
10 1299 Pennsylvania Avenue, NW, Suite 700
11 Washington, DC 20004-2400
12 Telephone: (202) 842-7800
13 Facsimile: (202) 842-7899

14 JUDD D. LAUTER (CA Bar No. 290945)
15 jlauter@cooley.com
16 3 Embarcadero Center, 20th Floor
17 San Francisco, CA 94111-4004
18 Telephone: (415) 693-2000
19 Facsimile: (415) 693-2222

20 Attorneys for Plaintiff
21 GOOGLE LLC

22 UNITED STATES DISTRICT COURT
23 NORTHERN DISTRICT OF CALIFORNIA
24 SAN JOSE DIVISION

25 GOOGLE LLC, a Delaware limited liability
26 company,

27 Plaintiff,

28 v.

DOES 1–3,

Defendants.

Case No.

COMPLAINT FOR:

- I. **TRADEMARK INFRINGEMENT UNDER 15 U.S.C. § 1114**
- II. **UNFAIR COMPETITION AND FALSE DESIGNATION OF ORIGIN UNDER 15 U.S.C. § 1125(a)(1)(A)**
- III. **BREACH OF CONTRACT**

JURY TRIAL DEMANDED

Plaintiff Google LLC (“**Google**”) complains and alleges against defendants, Does 1-3 (“**Defendants**”), as follows:

INTRODUCTION

1
2 1. Artificial intelligence (“AI”) is a transformational technology with the potential to
3 contribute to tackling some of society’s most pressing challenges and opportunities.

4 2. Google’s approach to developing and harnessing the potential of AI is grounded in its
5 founding mission—to organize the world’s information and make it universally accessible and
6 useful—and it is shaped by the company’s commitments to developing technology responsibly and to
7 improving the lives of as many people as possible.

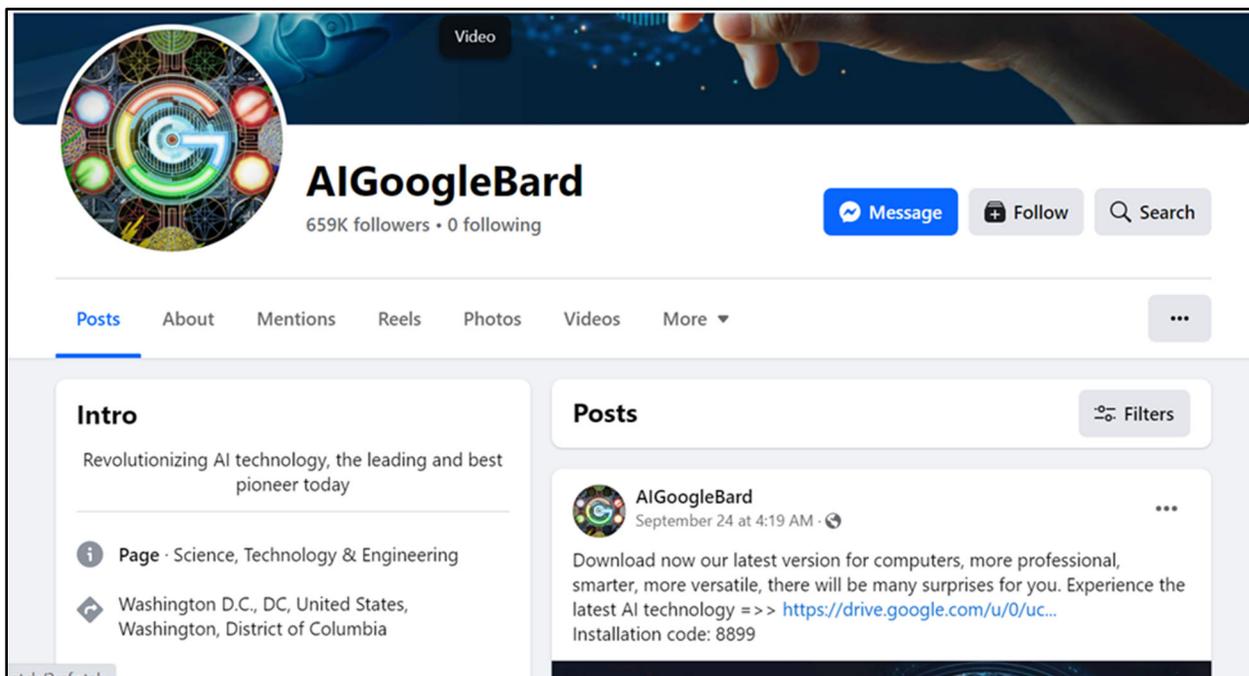
8 3. Google is at the forefront of recent advances in AI and has long been a trusted leader
9 in the field. Going back to its earliest days, Google has developed and leveraged AI to improve Google
10 search, enable the rapid translation of text across a wide variety of languages, and, more recently,
11 empower scientists to solve protein folding problems that will lead to advances in medical research
12 and treatments. Google’s landmark 2017 research paper “Attention is All You Need,” introduced a
13 new neural network architecture, which became the bedrock of today’s most impressive language
14 understanding and generative AI systems, including Google’s flagship conversational AI, Bard.

15 4. Released in early 2023, Bard is an advanced generative artificial intelligence tool based
16 on Google’s Pathways Language Model (or “PaLM”) family of large language models. It is capable
17 of generating text, translating languages, writing different kinds of creative content and more, all in
18 response to natural language user prompts or queries.

19 5. Defendants are three individuals whose identities are unknown who claim to provide,
20 among other things, “the latest version” of Google Bard for download. Defendants are not affiliated
21 with Google in any way, though they pretend to be. They have used Google trademarks, including
22 GOOGLE, GOOGLE AI, and BARD to lure unsuspecting victims into downloading malware onto
23 their computers.

24 6. Here is how Defendants’ scheme works: using social media pages, posts, and ads with
25 Google trademarks and designed to look like they originate from Google, Defendants exploit the
26 public’s interest in Google’s AI products, and invite them to download free versions of Bard and other
27
28

1 Google AI products via links to Google Drive or Google Sites, among other methods (see Figure 1).



13 Figure 1¹

14 7. Downloading the file at the link causes malware to install on the user's device. The
15 malware is designed to access and send the users' social media login credentials to Defendants, who
16 then access the social media accounts using the stolen credentials. As explained below, Defendants
17 target users with business and advertiser accounts on a large social media platform, often small
18 businesses.

19 8. Google brings this action for trademark infringement and breach of contract to disrupt
20 Defendants' fraudulent scheme, prevent Defendants from causing further harm to Google's users, and
21 raise public awareness about Defendants' misconduct so users can protect themselves.

22 PARTIES

23 9. Plaintiff Google LLC is a limited liability company organized under the laws of the
24 state of Delaware with its principal place of business located at 1600 Amphitheatre Parkway, Mountain
25 View, California 94043.

26 10. Defendants are unknown individuals who appear to be based in Vietnam that have
27

28 ¹ <https://www.facebook.com/newsAI.Future>.

1 orchestrated a prevalent malware campaign designed to steal social media login credentials from
2 unsuspecting victims. Defendants deceptively hold themselves out as “Google AI,” “AIGoogle,”
3 “AiGoogle,” “AIGoogle.Plus,” “AIGoogle Bard FB,” “AIGoogleBard” on Facebook. Defendants
4 control the Facebook pages, advertisements, and email addresses listed in **Exhibit A**.

5 11. Google does not know the true names and capacities of Defendants and therefore sues
6 them under fictitious names. Google will amend this Complaint to allege the true names and capacities
7 of Defendants if and when they are discovered.

8 **JURISDICTION, VENUE, AND DIVISIONAL ASSIGNMENT**

9 12. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331 and 15 U.S.C.
10 § 1121, as this action arises under the federal Lanham Act, as amended, 15 U.S.C. § 1051 *et seq.* (the
11 “**Lanham Act**”). The Court has supplemental jurisdiction over Google’s claim for breach of contract
12 under California law pursuant to 28 U.S.C. § 1367 because the claims herein form part of the same
13 case or controversy under Article III of the United States Constitution.

14 13. This Court has personal jurisdiction over Defendants in California because: (i)
15 Defendants knowingly targeted individuals and businesses in the State of California, including Google
16 and Meta, both of which have their principal places of business in this State; (ii) a substantial number
17 of acts and omissions that make up Defendants’ tortious conduct occurred in this State; and (iii)
18 Defendants consented to the jurisdiction of the federal or state courts of Santa Clara County,
19 California, by agreeing to Google’s Terms of Service and the forum selection clause therein.

20 14. Venue is proper in this District under 28 U.S.C. § 1391(b)(2) because: (i) Google is
21 headquartered in this District; (ii) Defendants’ conduct is causing injury in this District; and/or (iii) a
22 substantial part of the events or omissions giving rise to Google’s claims occurred in this District. In
23 addition, Defendants consented to venue in this District by agreeing to Google’s Terms of Service, as
24 discussed in more detail below.

25 15. This action is properly assigned to the San Jose Division of this District under Civil
26 Local Rule 3-2(c) because Plaintiff Google is headquartered in Santa Clara County, which is served
27 by the San Jose Division.

28

GOOGLE AI AND BARD

1
2 16. On February 6, 2023, Google announced that it would soon launch Bard, its
3 experimental conversational AI tool. Bard was launched in a limited release on March 21, 2023, before
4 becoming more widely available in May 2023.

5 17. Bard seeks to combine the breadth of the world’s knowledge with the power,
6 intelligence, and creativity of Google’s large language models.

7 18. Powered by Google’s next generation language model, PaLM 2, Bard learns by reading
8 trillions of words in order to pick up on the patterns that make up language and absorb information so
9 that it can respond to user prompts or queries by predicting what language combinations would be
10 responsive. Today, Bard can generate creative text content, translate languages, write computer code,
11 and answer user questions in a natural and informative way. It is currently available in over 40
12 languages, in numerous countries worldwide, with rollouts in additional languages and countries
13 forthcoming.

14 19. Bard is a web-based platform accessible exclusively at bard.google.com; it is not
15 available via download. To access Bard in the regions where it is currently available, a user need only
16 sign into either a personal Google Account or a Google Workspace account with Bard access enabled.
17 Access to Bard is free.

18 20. Google is engaged in advanced research and development around new AI technologies,
19 including in the fields of quantum computing and medicine. Google publishes information and updates
20 about AI-related Google projects at the domain **ai.google**.

21 21. Google uses a variety of channels to create awareness of Bard and other Google AI
22 products and initiatives, including promoting them through Facebook ads that link to ai.google or to
23 other sources of information. On information and belief, Defendants deliberately use this same
24 platform for their own ads, to increase confusion among users who are accustomed to seeing legitimate
25 Google AI ads on Facebook.

26 22. As further described below, Google owns valuable trademark rights for marks used in
27 connection with its AI offerings. Defendants have deliberately misused these trademarks in their
28 efforts to exploit public interest about Google’s AI projects to deceive victims into downloading

1 Defendants' malicious code.

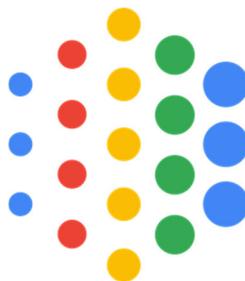
2 **THE GOOGLE, GOOGLE AI, G LOGO, AND BARD TRADEMARKS**

3 23. Since its inception in 1998, Google has devoted substantial time, effort, and resources
4 to the development and promotion of its highly regarded goods and services under the GOOGLE
5 trademark. As a result, the GOOGLE mark has acquired significant recognition in the marketplace
6 and has come to embody the substantial and valuable goodwill of Google.

7 24. To protect the GOOGLE mark for its exclusive use and as notice to the public of its
8 claim of ownership therein, Google owns numerous trademark registrations for the GOOGLE mark
9 and variations thereof, including but not limited to: U.S. Registration Nos. 2,806,075; 2,884,502;
10 4,058,966; 4,120,012; 4,123,471; 4,168,118; 4,202,570; 4,217,894; 4,525,914; 5,324,609; 5,324,610;
11 and 6,373,292. Copies of these registrations are attached as **Exhibit B**.

12 25. Among many other uses, Google uses its famous GOOGLE mark as part of its
13 composite mark GOOGLE AI. Google has acquired common law rights in the GOOGLE AI word
14 mark and associated logo through use of the marks in commerce since at least as early as 2017.

15 26. In conjunction with the GOOGLE AI mark, and since at least as early as May 2018,
16 Google uses a "design mark" – more commonly known as a logo – that consists of columns of multi-
17 colored dots of different sizes in red, yellow, green, and blue (the color sequence Google has come to
18 be associated with given its consistent incorporation into many trademarks in its portfolio), which are
19 arranged in the shape of a hexagon (the "Google AI Logo," displayed below).



25 As a result of Google's widespread and exclusive use of the Google AI Logo for several years, the
26 Google AI Logo has come to embody the substantial and valuable reputation and goodwill that Google
27 has earned in the marketplace for its AI-related products and services.

28

1 27. In addition, Google also uses a design mark that consists of the letter “G” drawn in
2 Google’s proprietary logotype similarly featuring Google’s distinct multi-color sequence of red,
3 yellow, green, and blue (the “**G Logo**,” displayed below).



8 28. The G Logo is used to signify and represent Google in compact or space constrained
9 contexts. Google has used the G Logo in U.S. commerce since at least as early as 2015, and owns
10 federal trademark registrations for the logo, including but not limited to U.S. Registration Nos.
11 5,365,541; 5,520,292; and 5,520,297.² Copies of these registrations are attached as **Exhibit C**.

12 29. Due to its widespread and extensive use of the G Logo for eight years, the mark enjoys
13 widespread recognition among consumers as a symbol of Google and its services.

14 30. Google also owns rights in the trademark BARD (together with the GOOGLE and
15 GOOGLE AI marks, Google AI Logo, and G Logo, the “**Google Marks**”). On February 3, 2023, a
16 few days before announcing Bard, Google filed an application to register the BARD mark in the United
17 States. *See* U.S. Serial No. 97/780,614 (Details attached as **Exhibit D**). The BARD mark has been in
18 use in commerce since at least as early as March 21, 2023.³ Due to extensive media coverage and
19 Google’s promotional efforts, Google’s BARD mark quickly became well-known among consumers.

20 31. As a result, consumers associate the BARD mark with Google and conversational AI
21 tools.

22 **DEFENDANTS’ SCHEME & MISUSE OF GOOGLE’S TRADEMARKS**

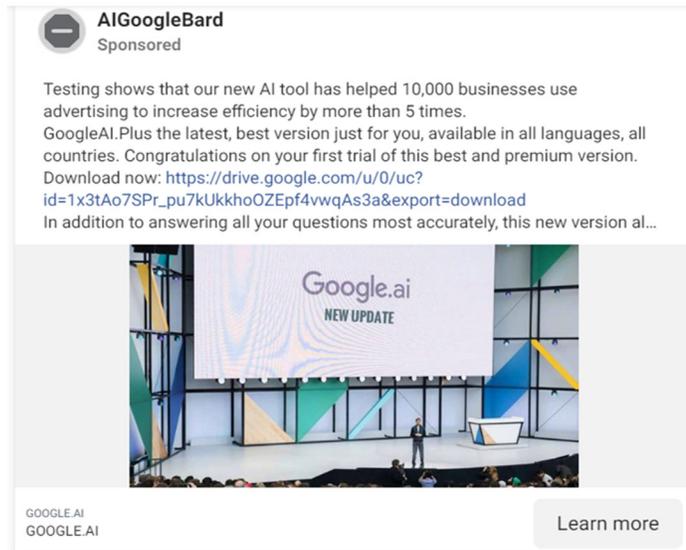
23 32. Defendants distribute links to their malware through social media posts, ads (i.e.,
24 sponsored posts), and pages, each of which purport to offer downloadable versions of Bard or other
25

26 ² Google’s priority date in the G Logo, based on its claim of foreign priority under Section 44(d) of
the Lanham Act in U.S. Registration No. 5,365,541, is August 24, 2015.

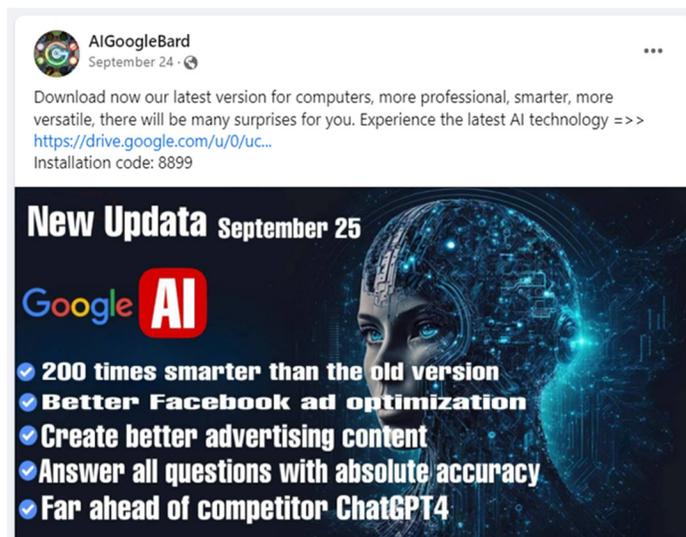
27 ³ Google’s common law rights in the BARD mark may date even earlier than this launch, based on its
28 acquisition of rights through use analogous to trademark use occurring as of February 6, 2023, when
it widely announced the launch of BARD.

1 Google AI products.

2 33. In these posts, ads, and pages, Defendants hold themselves out under “GOOGLE”-
 3 formative names such as “Google AI,” “AIGoogle,” “AiGoogleBard,” and “AIGoogle.Plus,” among
 4 others, to make viewers believe that Google is offering the download. These spurious marks appear
 5 in the upper left hand corner, in the field where the owner of a page, ad, or post is displayed (*See*
 6 *Figures 2-3*).



7
8
9
10
11
12
13
14
15
16 Figure 2⁴



17
18
19
20
21
22
23
24
25
26 Figure 3⁵

27
28 ⁴ www.facebook.com/ads/library/?id=709657731179392

⁵ *See* <https://www.facebook.com/newsAI.Future> (post dated September 24,2023).

1 Additional examples are shown on **Exhibit E**.

2 34. Defendants’ use of the Google Marks pervades their posts, ads, and pages. The
 3 GOOGLE, GOOGLE AI, G LOGO, and BARD marks, or confusingly similar variations thereof,
 4 feature prominently in Defendants’ social media cover photos, profile pictures, and other visual
 5 content.



6
7
8
9
10
11
12
13
14
15
16 Figure 4⁶



17
18
19
20
21
22
23
24
25
26
27
28 Figure 5⁷

⁶ See www.facebook.com/AIGoogleweb

⁷ See www.facebook.com/sumaprothomlight

1 38. On information and belief, Defendants’ ads that contain malicious links and infringe
2 Google’s trademarks are targeted to, and accessed by, persons in the United States, including
3 California residents. Publicly-available information about some of Defendants’ ads from Facebook’s
4 Ad Library shows they direct their ads to US-based users, the ads are accessible in the US, and US-
5 based users (including a California user) have interacted with the ads.

6 39. Defendants also characterize their downloads as a “Free Trial” of Google’s AI
7 offerings, or tout “Free installation codes.” The “Free” installation codes in Defendants’ ads and posts
8 are actually passwords that open files containing malware payloads.

9 40. When a user logged into a social media account clicks the links displayed in
10 Defendants’ ads or on their pages, the links redirect to an external website from which a RAR archive,
11 a type of file, downloads to the user’s computer. The RAR archive is encrypted with a password
12 provided in the corresponding post or ad, which Defendants characterize as an installation code. Once
13 a user enters the installation code, the RAR archive opens and delivers a Windows Installer package
14 file, ending with the extension “.msi” (“**.msi file**”). This msi file contains a Javascript payload and
15 accompanying installation scripts and metadata for a malicious browser extension, which installs
16 automatically on the user’s device.

17 41. Once installed, the malicious browser extension collects sensitive data from the
18 victim’s social media account and sends it to a remote server controlled by Defendants. Based on a
19 forensic investigation performed on Google’s behalf, this remote server is located in or around Los
20 Angeles, California, at the IP address 198.252.99.154.

21 42. The sensitive social media account data collected by Defendants includes login credentials,
22 which, once used, allow Defendants to identify accounts with large followings and/or associated advertiser
23 or business accounts. Specifically, Defendants use the victims’ stolen authentication tokens to query social
24 media account data including the fields “fan_count,” “business,” “verification_status,”
25 “can_create_ad_account,” “sharing_eligibility_status,” “created_time,” “is_prepay_account,”
26 “adspaymentcycle,” and various others. This information is encoded and sent to Defendants, who, on
27 information and belief, use the information to prioritize valuable accounts for takeover.

28 43. Based on a review of social media accounts that have run or are running Defendants’

1 pages, posts and ads, Defendants appear to take over the accounts, then they change the account name
 2 to an alias related to Google or Google products, create additional malicious advertisements that
 3 include links to Defendants' malware, and post those ads using the victim's advertising account.

4 44. On information and belief, Defendants' intended victims include small businesses with
 5 business or advertiser accounts that Defendants redirect for their own purposes. In addition to
 6 including code that allows Defendants to identify which of their victims are likely to have such
 7 resources, some of Defendants' ads expressly target small businesses by claiming that Defendants'
 8 fake AI downloads can aid in marketing.

- 9 • "Testing shows that our new AI tool has helped 10,000 businesses use advertising to
 10 increase efficiency by more than 5 times. GoogleAI.Plus [is] the latest, best
 11 version...Congratulations on your first trial of this best and premium version."⁹
- 12 • Inviting users to download the software to use for "better [] ad optimization" and to
 13 "create better advertising content."¹⁰

14 45. Some of Defendants' ads display a "Learn More" button at the bottom, with text
 15 suggesting that the button links to the domain "google.ai." or "ai.google."¹¹ Selecting "Learn More"
 16 does not lead to google.ai, but to links for Defendants' malware. Because Google's own AI-related
 17 social media ads often include a link to google.ai, users exposed to such ads are even more likely to
 18 mistakenly believe that Defendants' ads originate from Google.

19 **DEFENDANTS' VIOLATIONS OF GOOGLE'S TERMS OF SERVICE**

20 46. In addition to misrepresenting their malicious links as Google AI or Bard downloads,
 21 Defendants misuse other Google services to execute their scheme, including Google Sites and Google
 22 Drive, which Defendants use to host links to the RAR archive files containing their malware.

23 47. Google Sites and Google Drive are Google services through which a user may upload,
 24 store, and distribute their own content; Google does not use Google Sites or Google Drive to distribute
 25 its own content and services to users. Nevertheless, Defendants' links, which contain "Google" in the
 26

27 ⁹ <https://www.facebook.com/ads/library/?id=665504448883516>

28 ¹⁰ <https://www.facebook.com/ads/library/?id=325977226691811>

¹¹ <https://www.facebook.com/ads/library/?id=709657731179392>

1 text, make it even more likely that some users will believe that the content originates from Google.
2 On information and belief, Defendants utilize these platforms for this reason.

3 48. In order to upload content to Google Sites or Google Drive, users must either create or
4 use an existing Google account (“Google Account”). By creating a Google Account, each user
5 expressly agrees to Google’s Terms of Service (“TOS”).

6 49. Google’s TOS varies by the country where the user’s IP address is located at account
7 creation. For example, a user creating a Google Account from a United States IP address must agree
8 to Google’s United States TOS (<https://policies.google.com/terms?hl=en-US>). A user accessing
9 Google from an IP address in Vietnam must agree to Google’s Vietnam TOS (located in English here:
10 <https://policies.google.com/terms?hl=en&gl=vn>). Much of the TOS content is the same across country
11 versions, however.

12 50. At all relevant times, both the U.S. and Vietnam versions of the TOS have provided
13 that:

14 California law will govern all disputes arising out of or relating to these terms,
15 service-specific additional terms, or any related services.... These disputes will be
16 resolved exclusively in the federal or state courts of Santa Clara County,
California, USA, and you and Google consent to personal jurisdiction in those
courts.¹²

17 51. While many Google Drive links involved in the scheme were created by users who
18 agreed to the Vietnam TOS, some belonged to users who accepted Google’s TOS in the U.S. and
19 India. The choice of law and choice of forum provision in Google’s India TOS is substantially the
20 same as that set forth above.¹³

21 52. All versions of the TOS prohibit users from “abus[ing], harm[ing], interfer[ing] with,
22 or disrupt the services — for example, by accessing or using them in fraudulent or deceptive ways,
23 introducing malware, or spamming, hacking, or bypassing our systems or protective measures.”

24 53. All versions of the TOS also incorporate by reference certain “service-specific
25 additional terms and policies.” As is relevant here, the TOS incorporate by reference Google’s “Abuse
26

27 ¹² Vietnam TOS: <https://policies.google.com/terms?hl=en&gl=vn#toc-problems>; US TOS:
<https://policies.google.com/terms#toc-problems>

28 ¹³ India TOS: <https://policies.google.com/terms?gl=IN&hl=en-GB&pli=1#toc-problems>

1 Program Policies & Enforcement” (“**Abuse Policies**”) for all users of Google Drive or Google Sites.¹⁴

2 54. At all relevant times, the Abuse Policies have included the following provisions:

3 Do not transmit malware or any content that harms or interferes with the operation
4 of the networks, servers, end user devices, or other infrastructure. This includes
5 the direct hosting, embedding, or transmission of malware, viruses, destructive
6 code, or other harmful or unwanted software or similar content. This also includes
7 content that transmits viruses, causes pop-ups, attempts to install software without
8 the user’s consent, or otherwise impacts users with malicious code...

9 ...Do not use this product for phishing. This includes soliciting or collecting
10 sensitive data such as passwords, financial details, and social security numbers.¹⁵

11 55. Google’s policies also prohibit impersonation of others.

12 56. The Abuse Policies are the same in every country, with translations to other languages
13 provided for convenience.

14 57. By using Google Sites and Google Drive to impersonate Google, and to host and push
15 downloads of their malware to users, Defendants agreed to, and then violated, Google’s TOS and
16 Abuse Policies (which are incorporated by reference into the TOS).

17 58. Google has expended substantial time and resources to identify and prevent
18 Defendants’ abuses of Google’s services.

19 59. By utilizing Google Sites and Google Drive for malicious purposes, namely as
20 infrastructure to support Defendants’ unlawful malware scheme, Defendants’ conduct threatens to
21 harm Google’s reputation and the reputation of those Google services.

22 **FIRST CLAIM FOR RELIEF**

23 **INFRINGEMENT OF A REGISTERED TRADEMARK, 15 U.S.C. § 1114**

24 60. Google realleges and incorporates by reference the allegations of each and every one
25 of the preceding paragraphs as though fully set forth herein.

26 61. The registered Google Marks are all valid trademarks entitled to protection under the
27 Lanham Act and are registered on the principal register at the United States Patent & Trademark
28

¹⁴ See, e.g., Vietnam: <https://policies.google.com/terms/service-specific?hl=en&gl=vn> (scroll to “Drive” and click arrow to expand and view applicable policies; scroll to “Sites” and click arrow to view applicable policies).

¹⁵ <https://support.google.com/docs/answer/148505?hl=en#zippy=%2Cmalware-and-similar-malicious-content%2Cphishing>

1 Office. The trademark registrations reflected in Exhibits B and C hereto are in full force and effect.

2 62. Defendants have used the registered Google Marks in interstate commerce.
3 Defendants' use of the registered Google Marks is likely to cause confusion, mistake, or deception as
4 to the origin, sponsorship, or approval of Defendants' unauthorized use of the registered Google Marks
5 on the content, including advertising and downloads, controlled by Defendants.

6 63. The above-described acts of Defendants constitute trademark infringement in violation
7 of 15 U.S.C. § 1114(1) and entitle Google to relief.

8 64. Defendants have unlawfully profited from the infringement of the registered Google
9 Marks detailed herein.

10 65. Because of Defendants' acts of trademark infringement, Google has suffered damage
11 to the goodwill associated with the registered Google Marks.

12 66. Defendants have irreparably harmed Google and, if not enjoined, will continue to
13 irreparably harm Google and its federally registered trademarks.

14 67. Defendants have irreparably harmed the general public and, if not enjoined, will
15 continue to irreparably harm the general public, which has an interest in being free from confusion,
16 mistake, and deception.

17 68. Google's remedy at law is not adequate to compensate it for the injuries inflicted by
18 Defendants. Accordingly, Google is entitled to the entry of permanent injunctive relief pursuant to 15
19 U.S.C. § 1116.

20 69. Google is entitled to damages, and Google is further entitled to have those damages
21 trebled under 15 U.S.C. § 1117.

22 70. This is an exceptional case making Google eligible for an award of attorneys' fees
23 pursuant to 15 U.S.C. § 1117.

24 **SECOND CLAIM FOR RELIEF**

25 **UNFAIR COMPETITION AND FALSE DESIGNATION OF ORIGIN, 15 U.S.C. § 1125(a)(1)(A)**

26 71. Google realleges and incorporates by reference the allegations of each and every one
27 of the preceding paragraphs as though fully set forth herein.

28 72. The Google Marks are distinctive marks that are associated with Google and

1 exclusively identify its business, products, and services.

2 73. Defendants' use of the Google Marks, and variations thereof, in interstate commerce is
3 likely to cause confusion, or to cause mistake, or to deceive the relevant public concerning the source
4 or origin of Defendants' malware. Indeed, that is Defendants' intent. Defendants pass themselves off
5 as Google and pretend to promote genuine Google products, in order to trick victims into downloading
6 malware.

7 74. Defendants' acts constitute trademark infringement of the Google Marks, as well as
8 false designation of origin, in violation of 15 U.S.C. § 1125(a), entitling Google to relief.

9 75. Defendants have unlawfully profited from the trademark infringement described
10 herein.

11 76. Because of the above-described acts of Defendants, Google has suffered damage to the
12 goodwill associated with the Google Marks.

13 77. Defendants have irreparably harmed Google, and if they are not enjoined, they will
14 continue to irreparably harm Google and the Google Marks.

15 78. Defendants have irreparably harmed the general public who are exposed to Defendants'
16 ads and other content promoting downloads of Defendants' malware, and if the Defendants are not
17 enjoined, they will continue to irreparably harm the general public, which has an interest in being free
18 from confusion, mistake, and deception.

19 79. Google's remedy at law is not adequate to compensate it for the injuries inflicted by
20 Defendants. Accordingly, Google is entitled to the entry of permanent injunctive relief pursuant to 15
21 U.S.C. § 1117.

22 80. This is an exceptional case making Google eligible for an award of attorneys' fees
23 pursuant to 15 U.S.C. § 1117.

24 **THIRD CLAIM FOR RELIEF**

25 **BREACH OF CONTRACT UNDER CALIFORNIA LAW**

26 81. Google realleges and incorporates by reference the allegations of each and every one
27 of the preceding paragraphs as though fully set forth herein.

28 82. Defendants entered into a valid, binding, and enforceable written contract with Google

1 by expressly agreeing to Google’s TOS, as set forth above.

2 83. Defendants breached the TOS by, among other things: (a) distributing malware; and
3 (b) impersonating Google.

4 84. Google has at all times complied with and performed all of its obligations under the
5 TOS. There are no unsatisfied conditions for Defendants’ performance under the TOS.

6 85. As set forth above, as a result of Defendants’ breach of the TOS, Defendants have
7 caused Google to be damaged in an amount to be determined at trial, including by forcing Google to
8 incur expenses to investigate and address Defendants’ breach.

9 **PRAYER FOR RELIEF**

10 WHEREFORE, Google respectfully requests the following relief:

- 11 1) That the Court enter a judgment against Defendants that Defendants have:
- 12 a) Infringed the rights of Google in the Registered Google Marks in violation of
13 15 U.S.C. § 1114(1);
- 14 b) Infringed the rights of Google in the Google Marks in violation of 15 U.S.C. §
15 1125(a); and
- 16 c) Breached their contracts with Google in violation of California law.
- 17 2) That each of the above acts was willful.
- 18 3) That the Court issue a permanent injunction enjoining and restraining Defendants and
19 their agents, servants, employees, successors and assigns, and all other persons acting
20 in concert with or in conspiracy with or affiliated with Defendants, from:
- 21 a) Engaging in any infringing activity including advertising, selling, and offering
22 for sale any goods or services in connection with the Google Marks or any
23 confusingly similar mark, whether occurring online or in connection with
24 physical advertising, products, and services;
- 25 b) Creating or maintaining any social media accounts, including any Facebook
26 accounts, that incorporate the Google Marks in their profile names, handles, and
27 profile images, or otherwise display the Google Marks in a manner likely to
28 cause confusion about the source of the account or any of its posts or

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- advertisements;
 - c) Registering, using, or trafficking in any domain name that is identical or confusingly similar to any of the Google Marks;
 - d) Operating or maintaining any websites that display content that infringes the Google Marks; and
 - e) Creating or maintaining any Google accounts or otherwise accessing Google services in violation of Google’s TOS.
- 4) That Google be awarded damages for Defendants’ trademark infringement and that these damages be trebled due to Defendants’ willfulness, in accordance with 15 U.S.C. § 1117.
 - 5) That Google be awarded all profits resulting from Defendants’ infringement of Google’s rights and by means of Defendants’ illegal acts.
 - 6) That Defendants be ordered to account for and disgorge to Google all amounts by which Defendants have been unjustly enriched by reason of the unlawful acts complained of herein.
 - 7) That Google be awarded pre-judgment and post-judgment interest; and
 - 8) That Google be granted such further relief as the Court may deem just and equitable.

JURY TRIAL DEMAND

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Google respectfully demands a jury trial of all issues so triable.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: November 13, 2023

Respectfully submitted,

By: /s/ Judd D. Lauter
Judd D. Lauter (290945)

COOLEY LLP
JUDD D. LAUTER (290945)
jlauter@cooley.com
3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
Telephone: (415) 693-2000
Facsimile: (415) 693-2222

TIANA DEMAS (*pro hac vice forthcoming*)
tdemas@cooley.com
110 N. Wacker Drive, Suite 4200
Chicago, Illinois 60606-1511
Telephone: +1 312-881-6500
Facsimile: +1 312-881-6598

REBECCA GIVNER-FORBES (*pro hac vice forthcoming*)
rgf@cooley.com
1299 Pennsylvania Avenue, NW, Suite 700
Washington, DC 20004-2400
Telephone: (202) 842-7800
Facsimile: (202) 842-7899

Attorneys for Plaintiff
GOOGLE LLC

EXHIBIT A

<u>Facebook Pages and Ads Controlled by Defendants</u>	
1.	facebook.com/Ai.Google.999
2.	facebook.com/AiGG.v3
3.	facebook.com/AiGoogle.Mkt2
4.	facebook.com/AIGoogleweb
5.	facebook.com/BardAIInsights
6.	facebook.com/CGGAI
7.	facebook.com/CinebolElAlto
8.	facebook.com/D2GgAi
9.	facebook.com/DhanishGopiPolitician
10.	facebook.com/googleaicom.io
11.	facebook.com/GoogleAIweb
12.	facebook.com/iinfo.googleai
13.	facebook.com/info.ai.google
14.	facebook.com/JuancitoPiratexAudiovisuales
15.	facebook.com/mktchatrobot
16.	facebook.com/newsAI.Future
17.	facebook.com/profile.php?id=61552052482077
18.	facebook.com/sumaprothomlight
19.	https://www.facebook.com/ads/library/?id=626911742949786
20.	https://www.facebook.com/ads/library/?id=6636108133103762
21.	https://www.facebook.com/ads/library/?id=279629991587747
22.	https://www.facebook.com/ads/library/?id=2014813425533700
23.	https://www.facebook.com/ads/library/?id=676720617728286
24.	https://www.facebook.com/ads/library/?id=709657731179392
25.	https://www.facebook.com/ads/library/?id=683625273698027
26.	https://www.facebook.com/ads/library/?id=325977226691811
27.	https://www.facebook.com/ads/library/?id=310146194877150
28.	https://www.facebook.com/ads/library/?id=3575044486052016
29.	https://www.facebook.com/ads/library/?id=2040383232976585
30.	https://www.facebook.com/ads/library/?id=1040608087272704
<u>Email Addresses Controlled by Defendants</u>	
1.	caldwellroxie27@gmail.com
2.	shubhamkumar40469@gmail.com
3.	marketingmymine@gmail.com
4.	nguyentshoppi1@gmail.com
5.	nguyenthianhquyen071992@gmail.com

EXHIBIT B

Int. Cls.: 38 and 42

Prior U.S. Cls.: 100, 101 and 104

Reg. No. 2,806,075

United States Patent and Trademark Office

Registered Jan. 20, 2004

**SERVICE MARK
PRINCIPAL REGISTER**

GOOGLE

GOOGLE INC. (CALIFORNIA CORPORATION)
2400 BAYSHORE PARKWAY
MOUNTAIN VIEW, CA 94043

FOR: PROVIDING ELECTRONIC MAIL AND WORKGROUP COMMUNICATIONS SERVICES OVER COMPUTER NETWORKS; PROVIDING MULTIPLE USER ACCESS TO PROPRIETARY COLLECTIONS OF INFORMATION BY MEANS OF GLOBAL COMPUTER INFORMATION NETWORKS, IN CLASS 38 (U.S. CLS. 100, 101 AND 104).

FIRST USE 9-0-1997; IN COMMERCE 9-0-1997.

FOR: COMPUTER SERVICES, NAMELY, PROVIDING SOFTWARE INTERFACES AVAILABLE OVER A NETWORK IN ORDER TO CREATE A PERSONALIZED ON-LINE INFORMATION SERVICE; EXTRACTION AND RETRIEVAL OF INFOR-

MATION AND DATA MINING BY MEANS OF GLOBAL COMPUTER NETWORKS; CREATING INDEXES OF INFORMATION, INDEXES OF WEB SITES AND INDEXES OF OTHER INFORMATION SOURCES IN CONNECTION WITH GLOBAL COMPUTER NETWORKS; PROVIDING INFORMATION FROM SEARCHABLE INDEXES AND DATABASES OF INFORMATION, INCLUDING TEXT, ELECTRONIC DOCUMENTS, DATABASES, GRAPHICS AND AUDIO VISUAL INFORMATION, BY MEANS OF GLOBAL COMPUTER INFORMATION NETWORKS, IN CLASS 42 (U.S. CLS. 100 AND 101).

FIRST USE 9-0-1997; IN COMMERCE 3-0-1997.

SER. NO. 75-978,469, FILED 9-16-1999.

APRIL L. RADEMACHER, EXAMINING ATTORNEY

Int. Cl.: 9

Prior U.S. Cls.: 21, 23, 26, 36, and 38

Reg. No. 2,884,502

United States Patent and Trademark Office

Registered Sep. 14, 2004

**TRADEMARK
PRINCIPAL REGISTER**

GOOGLE

GOOGLE INC. (DELAWARE CORPORATION)
BUILDING 41
160 AMPITHEATRE PARKWAY
MOUNTAIN VIEW, CA 94043

FOR: COMPUTER HARDWARE; COMPUTER
SOFTWARE FOR CREATING INDEXES OF INFOR-
MATION, INDEXES OF WEB SITES AND INDEXES

OF OTHER INFORMATION RESOURCES , IN
CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 1-26-2000; IN COMMERCE 1-26-2000.

SN 75-554,461, FILED 9-16-1998.

KELLY BOULTON, EXAMINING ATTORNEY

United States of America
United States Patent and Trademark Office

Google

Reg. No. 4,058,966

Registered Nov. 22, 2011

Amended Oct. 03, 2017

Int. Cl.: 9, 35, 36, 42

Service Mark

Trademark

Principal Register

Google Inc. (DELAWARE CORPORATION)
1600 Amphitheatre Parkway
Mountain View, CALIFORNIA 94043

CLASS 9: mobile phones; [computer software used to create visualizations of multi-dimensional designs in the fields of architecture, engineering, interior design, landscaping, game development and graphic arts;] computer software for accessing browsing over computer networks and secure private networks, also known as, communication software for providing access to the Internet; computer software for sharing of data and information over computer networks and secure private networks; computer software for communicating over computer networks and secure private networks, also known as, voice-over Internet protocol (VOIP) software, software for instant messaging, and software for reading and sending emails; computer software for use in connecting to and searching the contents of remote computers, computer networks, and secure private networks; computer software for running web applications; computer search engine software [; computer storage devices, namely, blank flash drives; computer mice and electric adapters]

FIRST USE 11-1-2000; IN COMMERCE 11-1-2000

CLASS 35: computerized on-line retail store services in the field of software applications for use on computers, mobile phones, and other electronic devices; computerized on-line ordering services in the field of books

FIRST USE 3-1-2010; IN COMMERCE 3-1-2010

CLASS 36: electronic commerce payment services

FIRST USE 6-29-2006; IN COMMERCE 6-29-2006

CLASS 42: application service provider (ASP) services, namely, hosting computer software applications of others; computer services, namely, providing search engines to allow users to find blogs on a wide variety of topics; computer services, namely, providing a search engine to allow users to search full texts of books, find reviews and other information on books, search for magazine content, and find references books on other wide sites; provision of customized search engines for others; providing technical information in the field of computer software development; providing a web site featuring software development tools and API's (application program interface) for developers

FIRST USE 5-1-2002; IN COMMERCE 5-1-2002

The mark consists of the word "GOOGLE" in a stylized font.

SER. NO. 85-222,261, FILED 01-20-2011



Joseph Matal

Performing the Functions and Duties of the
Under Secretary of Commerce for
Intellectual Property and Director of the
United States Patent and Trademark Office

United States of America
United States Patent and Trademark Office

GOOGLE

Reg. No. 4,120,012

Registered Apr. 3, 2012

Int. Cl.: 38

SERVICE MARK

PRINCIPAL REGISTER

GOOGLE INC. (DELAWARE CORPORATION)
1600 AMPHITHEATRE PARKWAY
MOUNTAIN VIEW, CA 94043

FOR: TELECOMMUNICATION SERVICES, NAMELY, COMMUNICATIONS VIA MULTINATIONAL TELECOMMUNICATION NETWORKS; TELECOMMUNICATIONS SERVICES, NAMELY, TELECOMMUNICATIONS ACCESS SERVICES; DATA TRANSMISSION AND RECEPTION SERVICES VIA TELECOMMUNICATION MEANS; ELECTRONIC EXCHANGE OF VOICE, DATA, AND GRAPHICS ACCESSIBLE VIA COMPUTER AND TELECOMMUNICATION NETWORKS; PROVIDING MULTIPLE-USER ACCESS TO A GLOBAL COMPUTER INFORMATION NETWORK; INTERNET CAFE SERVICES, NAMELY, PROVIDING TELECOMMUNICATIONS CONNECTIONS TO THE INTERNET IN A CAFE ENVIRONMENT; PROVIDING ONLINE BULLETIN BOARDS FOR TRANSMISSION OF MESSAGES AMONG USERS IN THE FIELD OF GENERAL INTEREST; PROVIDING ONLINE DISCUSSION GROUPS FOR TRANSMISSION OF MESSAGES AMONG USERS IN THE FIELD OF GENERAL INTEREST; ELECTRONIC MAIL SERVICES; WORKGROUP COMMUNICATIONS SERVICES OVER COMPUTER NETWORKS; INSTANT MESSAGING SERVICES; VOICE OVER IP SERVICES; COMMUNICATIONS BY COMPUTER TERMINALS; WIRELESS BROADBAND COMMUNICATION SERVICES; MOBILE PHONE COMMUNICATION SERVICES, IN CLASS 38 (U.S. CLS. 100, 101 AND 104).

FIRST USE 2-12-2001; IN COMMERCE 2-12-2001.

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

OWNER OF U.S. REG. NOS. 2,806,075, 2,884,502, AND 2,954,071.

SER. NO. 78-828,042, FILED 3-2-2006.

COLLEEN KEARNEY, EXAMINING ATTORNEY



David J. Kyfos

Director of the United States Patent and Trademark Office

United States of America
United States Patent and Trademark Office

Google

Reg. No. 4,123,471

Registered Apr. 10, 2012

Int. Cl.: 35

SERVICE MARK

PRINCIPAL REGISTER

GOOGLE INC. (DELAWARE CORPORATION)
2400 BAYSHORE PARKWAY
TRADEMARK DEPT
MOUNTAIN VIEW, CA 94043

FOR: DISSEMINATION OF ADVERTISING FOR OTHERS VIA THE INTERNET, IN CLASS 35 (U.S. CLS. 100, 101 AND 102).

FIRST USE 10-0-2000; IN COMMERCE 10-0-2000.

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

OWNER OF U.S. REG. NOS. 2,806,075 AND 2,884,502.

SER. NO. 78-433,507, FILED 6-10-2004.

PATRICIA EVANKO, EXAMINING ATTORNEY

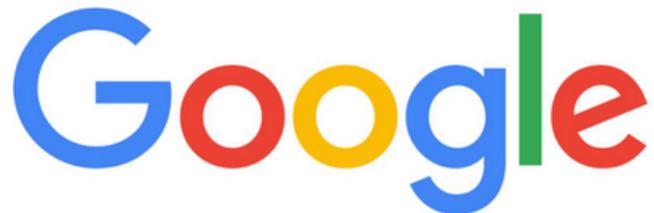


David J. Kyffers

Director of the United States Patent and Trademark Office

United States of America

United States Patent and Trademark Office



Reg. No. 4,168,118

Registered Jul. 03, 2012

Amended Oct. 24, 2017

Int. Cl.: 42

Service Mark

Principal Register

Google Inc. (DELAWARE CORPORATION)
1600 Amphitheatre Pkwy.
Mountain View, CALIFORNIA 94043

CLASS 42: Provision of Internet search engines

FIRST USE 4-1-2000; IN COMMERCE 4-1-2000

The color(s) blue, red, yellow, and green is/are claimed as a feature of the mark.

The mark consists of the first letter "G" which is blue; the second letter "O" is red; the third letter "O" is yellow; the fourth letter "G" is blue; the fifth letter "L" is green; and the sixth letter "E" is red.

OWNER OF U.S. REG. NO. 2954071, 2884502, 2806075

SER. NO. 85-531,517, FILED 02-01-2012



Joseph Matal

Performing the Functions and Duties of the
Under Secretary of Commerce for
Intellectual Property and Director of the
United States Patent and Trademark Office

United States of America
United States Patent and Trademark Office

GOOGLE

Reg. No. 4,202,570

Registered Sep. 4, 2012

Int. Cl.: 42

SERVICE MARK

PRINCIPAL REGISTER

GOOGLE INC. (DELAWARE CORPORATION)
1600 AMPHITHEATRE PARKWAY
MOUNTAIN VIEW, CA 94043

FOR: COMPUTER SERVICES, NAMELY, SEARCH ENGINE SERVICES; COMPUTER SERVICES, NAMELY, ACTING AS AN APPLICATION SERVICE PROVIDER TO HOST THE APPLICATIONS OF OTHERS; COMPUTER SERVICES, NAMELY, ACTING AS AN APPLICATION SERVICE PROVIDER TO HOST, MANAGE, DEVELOP, AND MAINTAIN APPLICATIONS, SOFTWARE, WEBSITES, AND DATABASES IN THE FIELD OF IN PERSONAL PRODUCTIVITY, COLLABORATION, COMMUNICATION, AND PUBLISHING; COMPUTER SERVICES, NAMELY, MONITORING, TRACKING AND REPORTING ON THE PERFORMANCE OF THE WEBSITE AND ONLINE CONTENT OF OTHERS; COMPUTER SERVICES IN THE NATURE OF CUSTOMIZED WEB PAGES FEATURING USER DEFINED INFORMATION, PERSONAL PROFILES, AND INFORMATION; PROVIDING ON-LINE NON-DOWNLOADABLE SOFTWARE FOR USE IN PERSONAL PRODUCTIVITY, COLLABORATION, COMMUNICATION, AND PUBLISHING; PROVIDING ON-LINE NON-DOWNLOADABLE SOFTWARE FOR USE IN DATABASE MANAGEMENT, FOR USE AS A SPREADSHEET, AND FOR WORD PROCESSING; PROVIDING ON-LINE NON-DOWNLOADABLE COMPUTER SOFTWARE FOR TRACKING DOCUMENTS OVER COMPUTER NETWORKS, INTRANETS AND THE INTERNET; PROVIDING ON-LINE NON-DOWNLOADABLE SOFTWARE FOR CREATING AND MAINTAINING WEBSITES AND BLOGS; PROVIDING ON-LINE NON-DOWNLOADABLE SOFTWARE FOR DOCUMENT COLLABORATION AND REVISION TRACKING; PROVIDING ON-LINE NON-DOWNLOADABLE SOFTWARE FOR GRANTING AND CONTROLLING ACCESS TO DOCUMENTS; PROVIDING ON-LINE NON-DOWNLOADABLE SOFTWARE FOR MANAGING INDIVIDUAL AND GROUP CALENDARS AND SCHEDULES; PROVIDING ON-LINE NON-DOWNLOADABLE SOFTWARE FEATURING ONLINE STORAGE OF DOCUMENTS AND DATABASES; PROVIDING ON-LINE NON-DOWNLOADABLE SOFTWARE FOR LANGUAGE TRANSLATION; PROVIDING ON-LINE COMPUTER MAPPING SERVICES; MAPPING SERVICES, NAMELY, PROVIDING A WEBSITE AND WEBSITE LINKS TO GEOGRAPHIC INFORMATION, MAP IMAGES, AND TRIP ROUTING; PROVIDING ONLINE NON-DOWNLOADABLE SOFTWARE FOR TRACKING, MANAGING, AND OPTIMIZING ADVERTISING AND PROMOTIONAL CAMPAIGNS, AND CALCULATING RETURN ON INVESTMENT IN CONNECTION WITH THE SAME; PROVIDING ONLINE NON-DOWNLOADABLE SOFTWARE FOR TRACKING WEBSITE TRAFFIC, E-COMMERCE ACTIVITY, CUSTOMER LOYALTY, AND SALES CONVERSION RATES; PROVIDING ONLINE NON-DOWNLOADABLE SOFTWARE FOR OPTIMIZING WEBSITE NAVIGATION; PROVIDING ONLINE NON-DOWNLOADABLE



David J. Kappas

Director of the United States Patent and Trademark Office

Reg. No. 4,202,570 SOFTWARE FOR MANAGING, COLLECTING, MONITORING AND ANALYZING WEB, BLOG AND OTHER ONLINE SITE TRAFFIC, USER PREFERENCES AND LINKS IN REAL TIME; TECHNICAL SUPPORT SERVICES, NAMELY, TROUBLESHOOTING OF PROBLEMS OF SOFTWARE FOR MANAGING, COLLECTING, MONITORING AND ANALYZING WEB, BLOG AND OTHER ONLINE SITE TRAFFIC, USER PREFERENCES AND LINKS; TECHNICAL SUPPORT SERVICES, NAMELY, TROUBLESHOOTING OF COMPUTER HARDWARE, COMPUTER SOFTWARE, AND NETWORK PROBLEMS; COMPUTER AND COMPUTER SOFTWARE CONSULTATION SERVICES, IN CLASS 42 (U.S. CLS. 100 AND 101).

FIRST USE 9-0-1997; IN COMMERCE 9-0-1997.

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

OWNER OF U.S. REG. NOS. 2,806,075, 3,140,793, AND OTHERS.

SN 77-082,272, FILED 1-12-2007.

JANICE L. MCMORROW, EXAMINING ATTORNEY

United States of America
United States Patent and Trademark Office

GOOGLE

Reg. No. 4,217,894

Registered Oct. 2, 2012

Int. Cl.: 39

SERVICE MARK

PRINCIPAL REGISTER

GOOGLE INC. (DELAWARE CORPORATION)
1600 AMPHITHEATRE PARKWAY
MOUNTAIN VIEW, CA 94043

FOR: ELECTRONIC STORAGE OF DIGITAL MEDIA, NAMELY, DATA, DOCUMENTS, TEXT, PHOTOGRAPHS, IMAGES, MUSIC, GRAPHICS, AUDIO, VIDEO, AND MULTIMEDIA CONTENT, IN CLASS 39 (U.S. CLS. 100 AND 105).

FIRST USE 1-1-2012; IN COMMERCE 1-1-2012.

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

OWNER OF U.S. REG. NOS. 2,806,075, 2,954,071 AND OTHERS.

SER. NO. 85-569,725, FILED 3-14-2012.

DANIEL CAPSHAW, EXAMINING ATTORNEY



David J. Kyffers

Director of the United States Patent and Trademark Office

United States of America
United States Patent and Trademark Office

GOOGLE

Reg. No. 4,525,914

Registered May 6, 2014

Int. Cl.: 35

SERVICE MARK

PRINCIPAL REGISTER

GOOGLE INC. (DELAWARE CORPORATION)
1600 AMPHITHEATRE PARKWAY
MOUNTAIN VIEW, CA 94043

FOR: ON-LINE RETAIL STORE SERVICES FEATURING CONSUMER GOODS OF OTHERS; ADVERTISING AND PROMOTING THE GOODS AND SERVICES OF OTHERS VIA A GLOBAL COMPUTER NETWORK; PROMOTING THE GOODS AND SERVICES OF OTHERS BY PROVIDING A WEBSITE FEATURING COUPONS, OFFERS, REBATES, REWARD CARDS, CONSUMER REVIEWS, LINKS TO THE RETAIL WEBSITES OF OTHERS, ONLINE CATALOGS FEATURING A WIDE VARIETY OF CONSUMER GOODS OF OTHERS, COMPARISON SHOPPING, AND DISCOUNT INFORMATION; PROVIDING COMMERCIAL ASSISTANCE TO ADVERTISERS IN CREATING, MANAGING, AND ORGANIZING ONLINE ADVERTISING AND ONLINE PRODUCT LISTINGS, IN CLASS 35 (U.S. CLS. 100, 101 AND 102).

FIRST USE 5-0-2011; IN COMMERCE 5-0-2011.

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

SER. NO. 86-116,485, FILED 11-12-2013.

KRISTIN CARLSON, EXAMINING ATTORNEY



Michelle K. Lee

Deputy Director of the United States
Patent and Trademark Office

United States of America

United States Patent and Trademark Office

Google

Reg. No. 5,324,609

Registered Oct. 31, 2017

Int. Cl.: 9, 25, 35, 36, 38, 39, 42

Service Mark

Trademark

Principal Register

Google Inc. (DELAWARE CORPORATION)
1600 Amphitheatre Parkway
Mountain View, CALIFORNIA 94043

CLASS 9: Downloadable software for creating indexes of information, indexes of web sites, and indexes of other information resources; downloadable software for mobile phones and mobile devices for detecting a user's location and displaying relevant local information of general interest; downloadable software for mobile phones and mobile devices that allows the user to search the phone or device's content for information, contacts, and applications; downloadable software for mobile phones and mobile devices that allows the user to search the Internet for information of general interest; computer hardware; battery chargers; power adapters

FIRST USE 9-1-2015; IN COMMERCE 9-1-2015

CLASS 25: Clothing, namely, shirts, T-shirts, hats, and caps; children's clothing, namely, t-shirts

FIRST USE 9-1-2015; IN COMMERCE 9-1-2015

CLASS 35: Dissemination of advertising for others via the Internet; on-line retail store services featuring consumer goods of others; advertising and promoting the goods and services of others via a global computer network; promoting the goods and services of others by providing a website featuring coupons, offers, rebates, reward cards, consumer reviews, links to the retail websites of others, online catalogs featuring a wide variety of consumer goods of others, comparison shopping, and discount information; providing commercial assistance to advertisers in creating, managing, and organizing online advertising and online product listings

FIRST USE 9-1-2015; IN COMMERCE 9-1-2015

CLASS 36: Charitable fundraising; providing grants to charitable organizations; financial services, namely, providing stock, bond, commodity, index, futures, options, securities, and currency prices and market information; financial services, namely, providing a web site with information concerning stocks, bonds, commodities, indexes, futures, options, securities, and currency prices, and where users can post ratings, reviews and recommendations on the same; financial transaction processing services, namely, clearing and reconciling financial transactions via a global computer network; bill payment services

FIRST USE 9-1-2015; IN COMMERCE 9-1-2015

CLASS 38: Telecommunication services, namely, communications via multinational telecommunication networks; telecommunications services, namely, telecommunications access services; data transmission and reception services via telecommunication means; electronic exchange of voice, data, and graphics accessible via computer and telecommunication networks; providing multiple-user access to a global computer



Joseph Matal

Performing the Functions and Duties of the
Under Secretary of Commerce for
Intellectual Property and Director of the
United States Patent and Trademark Office

information network; providing online bulletin boards for transmission of messages among users in the field of general interest; providing online discussion groups for transmission of messages among users in the field of general interest; electronic mail services; workgroup communications services over computer networks; instant messaging services; voice over ip services; communications by computer terminals; wireless broadband communication services; mobile phone communication services

FIRST USE 9-1-2015; IN COMMERCE 9-1-2015

CLASS 39: Electronic storage of digital media, namely, data, documents, text, photographs, images, music, graphics, audio, video, and multimedia content

FIRST USE 9-1-2015; IN COMMERCE 9-1-2015

CLASS 42: Provision of search engines for the Internet; providing e-mail authentication services, namely, providing an online service that allows users to sign on to multiple third party websites using a single user name and password; computer services in the nature of customized web pages featuring user defined information, personal profiles, and information; providing on-line non-downloadable software for use in database management, for use as a spreadsheet, and for word processing; providing on-line non-downloadable computer software for tracking documents over computer networks, intranets and the Internet; providing on-line non-downloadable software for creating and maintaining websites and blogs; providing on-line non-downloadable software for document collaboration and revision tracking; providing on-line non-downloadable software for granting and controlling access to documents; providing on-line non-downloadable software for managing individual and group calendars and schedules; providing on-line non-downloadable software featuring online storage of documents and databases; providing on-line non-downloadable software for language translation; providing on-line computer mapping services; mapping services, namely, providing a website and website links to geographic information, map images, and trip routing; providing online non-downloadable software for tracking, managing, and optimizing advertising and promotional campaigns, and calculating return on investment in connection with the same; providing online non-downloadable software for tracking website traffic, e-commerce activity, customer loyalty, and sales conversion rates; providing online non-downloadable software for optimizing website navigation; providing online non-downloadable software for managing, collecting, monitoring and analyzing web, blog and other online site traffic, user preferences and links in real time; technical support services, namely, troubleshooting of problems of software for managing, collecting, monitoring and analyzing web, blog and other online site traffic, user preferences and links; design and development services for others of software for managing, collecting, monitoring and analyzing web, blog and other online site traffic, user preferences and links; technical support and consulting services related to all of the foregoing; computer consultation services

FIRST USE 9-1-2015; IN COMMERCE 9-1-2015

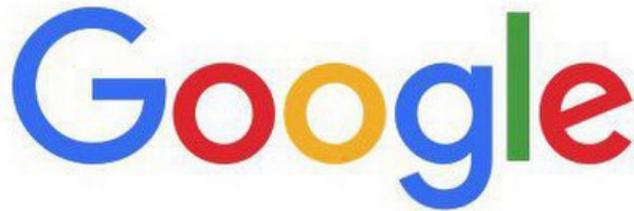
The mark consists of the word "GOOGLE" in a stylized font.

OWNER OF U.S. REG. NO. 4168118, 4058966, 3140793

SER. NO. 86-912,574, FILED 02-18-2016

United States of America

United States Patent and Trademark Office



Reg. No. 5,324,610

Registered Oct. 31, 2017

Int. Cl.: 9, 25, 35, 36, 38, 39, 42

Service Mark

Trademark

Principal Register

Google Inc. (DELAWARE CORPORATION)
1600 Amphitheatre Parkway
Mountain View, CALIFORNIA 94043

CLASS 9: Downloadable software for creating indexes of information, indexes of web sites, and indexes of other information resources; downloadable software for mobile phones and mobile devices for detecting a user's location and displaying relevant local information of general interest; downloadable software for mobile phones and mobile devices that allows the user to search the phone or device's content for information, contacts, and applications; downloadable software for mobile phones and mobile devices that allows the user to search the Internet for information of general interest; computer hardware; battery chargers; power adapters

FIRST USE 9-1-2015; IN COMMERCE 9-1-2015

CLASS 25: Clothing, namely, shirts, T-shirts, hats, and caps; children's clothing, namely, t-shirts

FIRST USE 9-1-2015; IN COMMERCE 9-1-2015

CLASS 35: Dissemination of advertising for others via the Internet; on-line retail store services featuring consumer goods of others; advertising and promoting the goods and services of others via a global computer network; promoting the goods and services of others by providing a website featuring coupons, offers, rebates, reward cards, consumer reviews, links to the retail websites of others, online catalogs featuring a wide variety of consumer goods of others, comparison shopping, and discount information; providing commercial assistance to advertisers in creating, managing, and organizing online advertising and online product listings

FIRST USE 9-1-2015; IN COMMERCE 9-1-2015

CLASS 36: Charitable fundraising; providing grants to charitable organizations; financial services, namely, providing stock, bond, commodity, index, futures, options, securities, and currency prices and market information; financial services, namely, providing a web site with information concerning stocks, bonds, commodities, indexes, futures, options, securities, and currency prices, and where users can post ratings, reviews and recommendations on the same; financial transaction processing services, namely, clearing and reconciling financial transactions via a global computer network; bill payment services

FIRST USE 9-1-2015; IN COMMERCE 9-1-2015

CLASS 38: Telecommunication services, namely, communications via multinational telecommunication networks; telecommunications services, namely, telecommunications access services; data transmission and reception services via telecommunication means; electronic exchange of voice, data, and graphics accessible via computer and



Joseph Matal

Performing the Functions and Duties of the
Under Secretary of Commerce for
Intellectual Property and Director of the
United States Patent and Trademark Office

telecommunication networks; providing multiple-user access to a global computer information network; providing online bulletin boards for transmission of messages among users in the field of general interest; providing online discussion groups for transmission of messages among users in the field of general interest; electronic mail services; workgroup communications services over computer networks; instant messaging services; voice over ip services; communications by computer terminals; wireless broadband communication services; mobile phone communication services

FIRST USE 9-1-2015; IN COMMERCE 9-1-2015

CLASS 39: Electronic storage of digital media, namely, data, documents, text, photographs, images, music, graphics, audio, video, and multimedia content

FIRST USE 9-1-2015; IN COMMERCE 9-1-2015

CLASS 42: Provision of search engines for the Internet; providing e-mail authentication services, namely, providing an online service that allows users to sign on to multiple third party websites using a single user name and password; computer services in the nature of customized web pages featuring user defined information, personal profiles, and information; providing on-line non-downloadable software for use in database management, for use as a spreadsheet, and for word processing; providing on-line non-downloadable computer software for tracking documents over computer networks, intranets and the Internet; providing on-line non-downloadable software for creating and maintaining websites and blogs; providing on-line non-downloadable software for document collaboration and revision tracking; providing on-line non-downloadable software for granting and controlling access to documents; providing on-line non-downloadable software for managing individual and group calendars and schedules; providing on-line non-downloadable software featuring online storage of documents and databases; providing on-line non-downloadable software for language translation; providing on-line computer mapping services; mapping services, namely, providing a website and website links to geographic information, map images, and trip routing; providing online non-downloadable software for tracking, managing, and optimizing advertising and promotional campaigns, and calculating return on investment in connection with the same; providing online non-downloadable software for tracking website traffic, e-commerce activity, customer loyalty, and sales conversion rates; providing online non-downloadable software for optimizing website navigation; providing online non-downloadable software for managing, collecting, monitoring and analyzing web, blog and other online site traffic, user preferences and links in real time; technical support services, namely, troubleshooting of problems of software for managing, collecting, monitoring and analyzing web, blog and other online site traffic, user preferences and links; design and development services for others of software for managing, collecting, monitoring and analyzing web, blog and other online site traffic, user preferences and links; technical support and consulting services related to all of the foregoing; computer consultation services

FIRST USE 9-1-2015; IN COMMERCE 9-1-2015

The color(s) blue, red, yellow, and green is/are claimed as a feature of the mark.

The mark consists of the word "GOOGLE" in a stylized font. The letters from left to right are in the following colors: blue (the letter "G"), red (the letter "o"), yellow (the letter "o"), blue (the letter "g"), green (the letter "l") and red (the letter "e"). The color white shown in the mark is background only and is not claimed as a feature of the mark.

OWNER OF U.S. REG. NO. 4168118, 4058966, 3140793

SER. NO. 86-912,587, FILED 02-18-2016

environment; computer software for use in connection with the electronic storage, transmission, presentation, verification, authentication, and redemption of coupons, rebates, discounts, incentives, and special offers; computer software for use in connection with consumer loyalty programs and loyalty cards used to access and use loyalty points; Data processing equipment, namely, computers; Routers, namely, wireless network routers and network routers; Wireless indoor and outdoor speakers; Voice controlled audio speakers; Audio Speakers controlled by mobile applications; Home automation control device; Stand alone information device, namely, voice and manual controlled audio speakers with personal digital assistant capabilities for streaming and playing audio, video, and multimedia content, for controlling televisions, monitors and digital media streaming devices; Computer hardware for controlling home automation systems, namely, lighting, appliances, heating and air conditioning units, alarms and other safety equipment, home monitoring equipment; Stand alone information device, namely, voice and manual controlled audio speakers with personal digital assistant capabilities for accessing and searching online databases, websites, files, and other stored information on command; Stand alone information device, namely, voice and manual controlled audio speakers with personal digital assistant capabilities for providing personal concierge services for others initiated by voice-controlled commands via a mobile phone, computer, tablet, smart phone, handheld computer, portable computer, namely, adding and accessing calendar appointments, alarms, timers, and and reminders; electronic devices for providing access to the Internet, viewing information on global computer networks, voice command and recognition, speech-to-text conversion, personal information management, voice and data transmission, and hands-free use and remote control of electronic devices; Computer software for accessing and transmitting data and content among consumer electronics devices and displays; computer peripherals for accessing and transmitting data and content among consumer electronics devices and displays; Audio speakers; earbuds; earphones; headphones; accessory ear cushions for earbuds, earphones, and headphones; accessory ear pads for earbuds, earphones, and headphones; microphones; apparatus for recording, transmitting, recognizing, processing, and reproduction of sound; power adapters for earphones, earbuds, and charging case; computer software for automating capturing of photos and videos; cases and protective covers for mobile phones, smartphones, earphones, earbuds, headphones, tablets, headsets for virtual and augmented reality, and laptops; carrying cases and sleeves for mobile phones, smartphones, earphones, earbuds, headphones, tablets, headsets for virtual and augmented reality, and laptops; carrying cases and protective cases featuring battery charging devices, specially adapted for use with earbuds, earphones, and headphones; specially adapted carrying and charging cases featuring power supply connectors and battery charging devices for charging earphones and earbuds; protective covers for mobile phones, smartphones, and tablets; bumpers for mobile phones, smartphones, and tablets; hands-free devices for mobile-phones; headsets for virtual and augmented reality; keyboards; chargers for laptops, tablets, mobile phones, speakers, streaming devices, routers, headphones, earphones, and earbuds; car chargers; cases for chargers; battery chargers for earbuds, earphones, and headphones; charging cases; batteries; power cables and adapters; cables, namely, computer cables; electric charging cables for earphones, earbuds, headphones, and charging cases; screen protectors comprised of tempered glass and plastic adapted for use with portable electronic devices; interchangeable metal and fabric bases for voice activated speakers; computer software for transmission and display of digital content, audio works, visual works, audiovisual works, electronic publications, books, movies, and music; computer software for browsing and accessing digital content, computer software, computer games, audio works, visual works, audiovisual works, electronic publications, books, movies, and music

FIRST USE 9-00-1997; IN COMMERCE 1-26-2000

CLASS 35: Providing an online searchable database featuring employment opportunities and content about employment; providing online searchable database relating to job vacancies, the location of such vacancies, and the identity of employers

and recruiters searching for candidates; providing an interactive web site with information about job seeking; online retail store services featuring computer software programs, computer games, audio recordings, electronic publications, books, movies, videos, and TV programs

FIRST USE 9-00-1997; IN COMMERCE 3-6-2012

CLASS 36: Financial transaction services, namely, providing secure commercial transactions and payment options; provision of electronic contactless payment services, namely, processing of contactless credit and debit payments; financial transaction services, namely, providing secure commercial transactions and payment options using a mobile device at a point of sale; electronic credit card transaction processing, debit card services, pre-paid purchase card services, namely, processing electronic payments made through prepaid cards and processing electronic payment through pre-paid cards, processing electronic payments made through loyalty cards; electronic payment, namely, electronic processing and transmission of credit card transactions, wireless wallets, mobile wallets, electronic wallets, wireless credit, debit and prepared card transactions, credit card and transaction processing terminal services using near field communication (NFC) technology

FIRST USE 9-00-1997; IN COMMERCE 3-21-2006

CLASS 38: Telecommunication services, namely, transmission of e-mails, text messages, phone calls, voice, data, graphics, images, audio and video clips by means of telecommunications networks, wireless communication networks, and the Internet; electronic payment, namely, electronic transmission of credit card transactions, wireless wallets, mobile wallets, electronic wallets, wireless credit, debit and prepared card transactions, credit card and transaction processing terminal services using near field communication (NFC) technology

FIRST USE 9-00-1997; IN COMMERCE 7-10-2018

CLASS 39: Providing geographic information and interactive geographic maps via a website

FIRST USE 9-00-1997; IN COMMERCE 2-8-2005

CLASS 42: Computer services, namely, providing a search engine for obtaining data, graphics, files and images using non-downloadable image recognition software; providing online non-downloadable character recognition software; providing online non-downloadable image recognition software; providing online non-downloadable software for extracting and retrieving information and data for others by means of global computer networks; providing online non-downloadable software for searching a user's mobile phone, computer, tablet, or other electronic communication device, namely, wearable computer peripherals, for data, graphics, files and images; Providing on-line non-downloadable software for providing a personal voice-enabled digital assistant; Providing on-line non-downloadable voice recognition software; computer services, namely, providing a voice-controlled search engine for obtaining data, images, audio and video via a global computer network; provision of Internet search engines; Providing on-line non-downloadable software used to provide voice-controlled information and communications; providing a website that provides technology that enables users to sign up for job alerts online and apply for jobs; Providing temporary use of non-downloadable computer software for providing geographic information, interactive geographic maps, non-downloadable software for accessing satellite and aerial images of earth and space, and ocean bathymetry, via a website; providing online non-downloadable computer software for displaying geographic information, interactive geographic maps, satellite and aerial images of earth and space, and ocean bathymetry; Design and development of computer software; Providing temporary use of online non-downloadable software for streaming and playing audio, video, and multimedia content, and for controlling televisions, monitors, gaming systems, and digital media streaming

devices; Providing temporary use of online non-downloadable software for use in providing personal concierge services for others by voice-controlled commands via a mobile phone, computer, tablet, smart phone, handheld computer, portable computer, namely, adding and accessing calendar appointments, alarms, timers, reminders, and making restaurant, travel, and hotel reservations; Providing temporary use of online non-downloadable software for controlling home automation systems, namely, lighting, appliances, heating and air conditioning units, alarms and other safety equipment, home monitoring equipment; Technical support services, namely, troubleshooting in the nature of diagnosing software problems; Computer technology support services, namely, help desk services; Technical support services, namely, troubleshooting of computer software problems; Computer services, namely, cloud hosting provider services; Computer services, namely, integration of private and public cloud computing environments; Consulting services in the field of cloud computing technology, infrastructure-as-a-service (IAAS) cloud computing technology, software-as-a-service (SAAS) cloud computing technology, and platform-as-a-service (PAAS) cloud computing technology; Providing virtual computer systems and virtual computer environments through cloud computing; Technical support services, namely, remote and on-site infrastructure management services for monitoring, administration and management of public and private cloud computing IT and application systems; Application service provider (ASP), namely, hosting computer software applications of others; Cloud computing featuring software for use in creating web applications, syncing, storing, archiving and backing-up data to cloud servers; Non-downloadable computer software for managing, networking, collaborating within and providing remote access to databases; Cloud computing featuring software for use in deploying virtual machines to a cloud computing platform; Cloud computing featuring software for use in sharing data, creating data visualizations, data processing, and analyzing data; Cloud computing featuring software for use in administration of computer local area networks management of computer applications and computer hardware, and computer application distribution; Cloud computing featuring software for use in managing online projects, developing predictive digital marketing models, managing and facilitating online conferences, meetings, demonstrations, tours, presentations and interactive discussions; Platform-as-a-service (PAAS), Infrastructure-as-a-service (IAAS) and Software-as-a-service (SAAS) services featuring computer software platforms for creating web applications syncing, storing, archiving and backing-up data to cloud servers; Platform-as-a-service (PAAS), Infrastructure-as-a-service (IAAS) and Software-as-a-service (SAAS) services featuring computer software platforms for managing, networking, collaborating within and providing remote access to databases; Platform-as-a-service (PAAS), Infrastructure-as-a-service (IAAS) and Software-as-a-service (SAAS) services featuring computer software platforms for deploying virtual machines to a cloud computing platform; Platform-as-a-service (PAAS), Infrastructure-as-a-service (IAAS) and Software-as-a-service (SAAS) services featuring computer software platforms for sharing data, creating data visualizations, data processing, and analyzing data; Platform-as-a-service (PAAS), Infrastructure-as-a-service (IAAS) and Software-as-a-service (SAAS) services featuring computer software platforms for administration of computer local area networks management of computer applications and computer hardware, and computer application distribution; Platform-as-a-service (PAAS), Infrastructure-as-a-service (IAAS) and Software-as-a-service (SAAS) services featuring computer software platforms for managing online projects, developing predictive digital marketing models, managing and facilitating online conferences, meetings, demonstrations, tours, presentations and interactive discussions; Computer services, namely, creating cloud-based indexes of information; Providing online non-downloadable computer software for use as an application programming interface (API) for use in the fields of artificial intelligence, natural language processing, image content analysis, speech recognition, deep learning, high performance computing, distributed computing, virtualization, machine learning, cluster computing, internet of things, and container management; Electronic data storage, namely, storage and archival of data, electronic media, and digital content; Cloud computing and data center services for data backup and disaster recovery purposes, namely, electronic storage of data and storage services for archiving electronic data; Electronic data storage services, namely,

providing websites for the storage of digital content; Electronic data storage services, namely, providing remote cloud-based server storage to others; Technical consulting services in the field of electronic data storage and archiving of electronic data for others; Infrastructure as a service (IAAS), namely, providing remotely accessible electronic data storage; Electronic data storage services in the nature of technical management of virtual infrastructure storage services; providing temporary use of non-downloadable computer software for browsing and accessing digital content, computer software programs, audio works, visual works, audiovisual works, electronic publications, books, and movies; providing temporary use of non-downloadable computer software for transmission and display of digital content, audio works, visual works, audiovisual works, electronic publications, books, and movies

FIRST USE 9-00-1997; IN COMMERCE 2-8-2005

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

SER. NO. 87-786,172, FILED 02-06-2018

EXHIBIT C

United States of America

United States Patent and Trademark Office



Reg. No. 5,365,541

Registered Dec. 26, 2017

**Int. Cl.: 9, 25, 35, 36, 38,
39, 42**

Service Mark

Trademark

Principal Register

GOOGLE LLC (DELAWARE LIMITED LIABILITY COMPANY)
1600 Amphitheatre Parkway
Mountain View, CALIFORNIA 94043

CLASS 9: downloadable software for creating indexes of information, indexes of web sites, and indexes of other information resources; downloadable software for mobile phones and mobile devices for detecting a user's location and displaying relevant local information of general interest; downloadable software for mobile phones and mobile devices that allows the user to search the phone or device's content for information, contacts, and applications; downloadable software for mobile phones and mobile devices that allows the user to search the Internet for information of general interest; computer hardware; battery chargers; power adapters

FIRST USE 9-1-2015; IN COMMERCE 9-1-2015

CLASS 25: clothing, namely, shirts, t-shirts, hats, and caps; children's clothing, namely, t-shirts

FIRST USE 9-1-2015; IN COMMERCE 9-1-2015

CLASS 35: dissemination of advertising for others via the Internet; on-line retail store services featuring consumer goods of others; advertising and promoting the goods and services of others via a global computer network; promoting the goods and services of others by providing a website featuring coupons, offers, rebates, reward cards, consumer reviews, links to the retail websites of others, online catalogs featuring a wide variety of consumer goods of others, comparison shopping, and discount information; providing commercial assistance to advertisers in creating, managing, and organizing online advertising and online product listings

FIRST USE 9-1-2015; IN COMMERCE 9-1-2015

CLASS 36: charitable fundraising; providing grants to charitable organizations; financial services, namely, providing stock, bond, commodity, index, futures, options, securities, and currency prices and market information; financial services, namely, providing a web site with information concerning stocks, bonds, commodities, indexes, futures, options, securities, and currency prices, and where users can post ratings, reviews and recommendations on the same; financial transaction processing services, namely, clearing and reconciling financial transactions via a global computer network; bill payment services



Joseph Matal

Performing the Functions and Duties of the
Under Secretary of Commerce for
Intellectual Property and Director of the
United States Patent and Trademark Office

FIRST USE 9-1-2015; IN COMMERCE 9-1-2015

CLASS 38: telecommunication services, namely, communications via multinational telecommunication networks; telecommunications services, namely, telecommunications access services; data transmission and reception services via telecommunication means; electronic exchange of voice, data, and graphics accessible via computer and telecommunication networks; providing multiple-user access to a global computer information network; internet cafe services, namely, providing telecommunications connections to the internet in a cafe environment; providing online bulletin boards for transmission of messages among users in the field of general interest; providing online discussion groups for transmission of messages among users in the field of general interest; electronic mail services; workgroup communications services over computer networks; instant messaging services; voice over ip services; communications by computer terminals; wireless broadband communication services; mobile phone communication services

FIRST USE 9-1-2015; IN COMMERCE 9-1-2015

CLASS 39: electronic storage of digital media, namely, data, documents, text, photographs, images, music, graphics, audio, video, and multimedia content

FIRST USE 9-1-2015; IN COMMERCE 9-1-2015

CLASS 42: provision of search engines for the Internet; providing e-mail authentication services, namely, providing an online service that allows users to sign on to multiple third party websites using a single user name and password; computer services in the nature of customized web pages featuring user defined information, personal profiles, and information; providing on-line non-downloadable software for use in database management, for use as a spreadsheet, and for word processing; providing on-line non-downloadable computer software for tracking documents over computer networks, intranets and the Internet; providing on-line non-downloadable software for creating and maintaining websites and blogs; providing on-line non-downloadable software for document collaboration and revision tracking; providing on-line non-downloadable software for granting and controlling access to documents; providing on-line non-downloadable software for managing individual and group calendars and schedules; providing on-line non-downloadable software featuring online storage of documents and databases; providing on-line non-downloadable software for language translation; providing on-line computer mapping services; mapping services, namely, providing a website and website links to geographic information, map images, and trip routing; providing online non-downloadable software for tracking, managing, and optimizing advertising and promotional campaigns, and calculating return on investment in connection with the same; providing online non-downloadable software for tracking website traffic, e-commerce activity, customer loyalty, and sales conversion rates; providing online non-downloadable software for optimizing website navigation; providing online non-downloadable software for managing, collecting, monitoring and analyzing web, blog and other online site traffic, user preferences and links in real time; technical support services, namely, troubleshooting of problems of software for managing, collecting, monitoring and analyzing web, blog and other online site traffic, user preferences and links; design and development services for others of software for managing, collecting, monitoring and analyzing web, blog and other online site traffic, user preferences and links; technical support and consulting services related to all of the foregoing; computer consultation services

FIRST USE 9-1-2015; IN COMMERCE 9-1-2015

The color(s) red, yellow, green and blue is/are claimed as a feature of the mark.

The mark consists of a stylized letter "G" in the colors red, yellow, green and blue. The color white shown in the mark is background only and is not claimed as a feature of the mark.

SER. NO. 86-915,697, FILED 02-22-2016

United States of America

United States Patent and Trademark Office



Reg. No. 5,520,292

Registered Jul. 17, 2018

Int. Cl.: 9

Trademark

Principal Register

GOOGLE LLC (DELAWARE LIMITED LIABILITY COMPANY)
1600 Amphitheatre Parkway
Mountain View, CALIFORNIA 94043

CLASS 9: Handheld computers; portable computers; mobile phones; computers, tablet computers; computer hardware; computer peripherals for accessing and transmitting data and content among consumer electronics devices and displays; wearable computer peripherals; televisions; laptops; set top boxes; cameras; digital cameras; webcams; wearable computers; speakers; media streaming devices, namely, voice and manual controlled audio speakers with personal digital assistant capabilities; amplifiers; telecommunications base stations; wireless network routers; computer software for setting up, operating, trouble-shooting and testing wireless computer networks; computer network cables, power cables and adapters; batteries and battery chargers; wireless chargers; audio speakers; loud speakers; wireless indoor and outdoor speakers; loudspeaker systems; voice controlled audio speakers; audio speakers controlled by mobile applications; home automation control devices; stand-alone information devices, namely, voice and manual controlled audio speakers with personal digital assistant capabilities for streaming and playing audio, video, and multimedia content, for controlling televisions, monitors, gaming systems, other media playing devices such as DVD players and other streaming content devices; stand-alone information devices featuring a voice-enabled digital assistant; stand-alone information devices, namely, voice and manual controlled audio speakers with personal digital assistant capabilities for controlling home automation systems, namely, lighting, appliances, heating and air conditioning units, alarms and other safety equipment, home monitoring equipment; stand-alone information devices, namely, voice and manual controlled audio speakers with personal digital assistant capabilities for accessing and searching online databases, websites, mobile phones, computers, tablets, or other electronic communication devices for documents, files, and other stored information on command; stand-alone information devices, namely, voice and manual controlled audio speakers with personal digital assistant capabilities for providing personal concierge services for others initiated by voice-controlled commands via a mobile phone, computer, tablet computer, or electronic communication devices, namely, adding and accessing calendar appointments, alarms, timers, reminders, and making restaurant, travel, and hotel reservations



Andrei Iancu

Director of the United States
Patent and Trademark Office

FIRST USE 10-19-2017; IN COMMERCE 10-19-2017

The mark consists of the letter "G" in a stylized font. The mark is divided into four sections.

SER. NO. 87-224,991, FILED 11-03-2016

United States of America

United States Patent and Trademark Office



Reg. No. 5,520,297

Registered Jul. 17, 2018

Int. Cl.: 9

Trademark

Principal Register

GOOGLE LLC (DELAWARE LIMITED LIABILITY COMPANY)
1600 Amphitheatre Parkway
Mountain View, CALIFORNIA 94043

CLASS 9: Handheld computers; portable computers; mobile phones; computers, tablet computers; computer hardware; computer peripherals for accessing and transmitting data and content among consumer electronics devices and displays; wearable computer peripherals; televisions; laptops; set top boxes; cameras; digital cameras; webcams; wearable computers; speakers; media streaming devices, namely, voice and manual controlled audio speakers with personal digital assistant capabilities; amplifiers; telecommunications base stations; wireless network routers; computer software for setting up, operating, trouble-shooting and testing wireless computer networks; computer network cables, power cables and adapters; batteries and battery chargers; wireless chargers; audio speakers; loud speakers; wireless indoor and outdoor speakers; loudspeaker systems; voice controlled audio speakers; audio speakers controlled by mobile applications; home automation control devices; stand-alone information devices, namely, voice and manual controlled audio speakers with personal digital assistant capabilities for streaming and playing audio, video, and multimedia content, for controlling televisions, monitors, gaming systems, other media playing devices such as DVD players and other streaming content devices; stand-alone information devices featuring a voice-enabled digital assistant; stand-alone information devices, namely, voice and manual controlled audio speakers with personal digital assistant capabilities for controlling home automation systems, namely, lighting, appliances, heating and air conditioning units, alarms and other safety equipment, home monitoring equipment; stand-alone information devices, namely, voice and manual controlled audio speakers with personal digital assistant capabilities for accessing and searching online databases, websites, mobile phones, computers, tablets, or other electronic communication devices for documents, files, and other stored information on command; stand-alone information devices, namely, voice and manual controlled audio speakers with personal digital assistant capabilities for providing personal concierge services for others initiated by voice-controlled commands via a mobile phone, computer, tablet computer, or electronic communication devices, namely, adding and accessing calendar appointments, alarms, timers, reminders, and making restaurant, travel, and hotel reservations



Andrei Iancu

Director of the United States
Patent and Trademark Office

FIRST USE 10-19-2017; IN COMMERCE 10-19-2017

The color(s) red, yellow, green and blue is/are claimed as a feature of the mark.

The mark consists of a stylized letter "G" in the colors red, yellow, green and blue.

SER. NO. 87-227,236, FILED 11-04-2016

EXHIBIT D

Captured at: 11/10/2023, 07:05 PM

URL: https://tmsearch.uspto.gov/bin/showfield?f=doc&state=4802:7

otlk.2.1



United States Patent and Trademark Office

Home | Site Index | Search | FAQ | Glossary | Contacts | eBusiness | eBiz alerts | News

Trademarks > Trademark Electronic Search System (TESS)

TESS was last updated on Fri Nov 10 03:32:21 EST 2023

TESS HOME NEW USER STRUCTURED FREE FORM BROWSE DICT SEARCH OG BOTTOM HELP

Logout Please logout when you are done to release system resources allocated for you.

Record 1 out of 1

TSDR ASSIGN Status TTAB Status (Use the "Back" button of the Internet Browser to return to TESS)

BARD

Word Mark BARD

Goods and Services IC 042. US 100 101. G & S: Providing online non-downloadable software for use in processing and generating natural language queries; Providing online non-downloadable software using AI (artificial intelligence) for the production of speech and text; Providing online non-downloadable software for multi-modal machine-learning based language, text, and speech processing software; Providing temporary use of online non-downloadable software for facilitating interaction and communication between humans and AI (artificial intelligence) chatbots; Providing temporary use of online non-downloadable software for facilitating multi-modal natural language, speech, text, image, video, and sound input; Providing online non-downloadable chatbot software; research and development services in the field of multi-modal computer natural language processing, artificial intelligence, and machine learning; Providing online non-downloadable software for use in the fields of artificial intelligence, machine learning, natural language generation, statistical learning, mathematical learning, supervised learning, and unsupervised learning; providing information from searchable indexes and databases of information, including text, music, images, videos, software algorithms, mathematical equations, electronic documents, and databases, by means of non-downloadable chatbot software

Standard Characters Claimed

Mark Drawing Code (4) STANDARD CHARACTER MARK

Serial Number 97780614

Filing Date February 3, 2023

Current Basis 1B

Original Filing Basis 1B

International Registration Number 1739706

Owner (APPLICANT) Google LLC LIMITED LIABILITY COMPANY DELAWARE 1600 Amphitheatre Parkway Mountain View CALIFORNIA 94043

Attorney of Record Monique E. Liburd

Type of Mark SERVICE MARK

register PRINCIPAL
Live/Dead
Indicator LIVE

[TESS HOME](#) [NEW USER](#) [STRUCTURED](#) [FREE FORM](#) [BROWSE DICT](#) [SEARCH OG](#) [TOP](#) [HELP](#)

[| HOME](#) [| SITE INDEX](#) [| SEARCH](#) [| eBUSINESS](#) [| HELP](#) [| PRIVACY POLICY](#)

EXHIBIT E

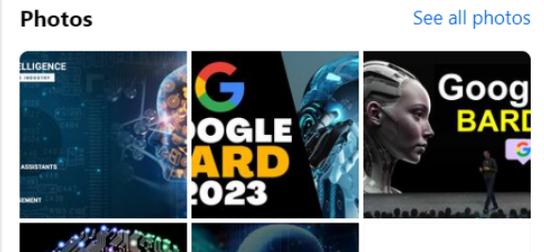


Bard AI Insights
47K likes • 47K followers

Message Like Search

Posts About Mentions Followers Photos Videos More

Intro
Page · Advertising/Marketing
jrfernandes43@hotmail.com



Posts Filters

Bard AI Insights
April 24 · 🌐
More than 1000 orders/day is not too difficult for **Google Bard AI** if you know how to make the most of **Bard AI's** huge knowledge and apply it to your advertising and marketing campaigns. Google has launched Bard, and unpublished version you can download trial here <https://sites.google.com/view/gg2504a>
After using, please take 1 minute to answer our survey questions to make the upcoming official version more complete. Thanks all!



Captured at: 2023/11/10 07:08 PM URL: https://www.facebook.com/iinfo.googleai

Facebook navigation bar with search, home, video, marketplace, groups, and profile icons. The profile icon for Google.Ai is highlighted.



Google.Ai

34K likes • 34K followers

Message Like Search

Navigation tabs: Posts, About, Mentions, Reviews, Reels, Photos, More

Intro

GoogleAi - Get more customers with next generation ads

Page · Science, Technology & Engineering

✉ googleai@gmail.com

🌐 googleai.com

★ Rating · 2.1 (16 Reviews)

Photos

[See all photos](#)



Posts

[Filters](#)



Google.Ai

September 30 · 🌐

⋮

Testing shows that our new AI tool has helped 10,000 businesses use advertising to increase efficiency by more than 5 times.
 Try it at => <https://sites.google.com/view/ais4mktupdate>
 Enter the installation code if requested: 888
 GoogleAI is an extremely powerful tool that can help digital marketers create high-quality content, help managers plan and reach the right audience quickly.



👍 Like
💬 Comment
🔗 Share

✎

Captured at: 2023/11/10 07:10 PM URL: https://www.facebook.com/mktchatrobot

Facebook navigation bar with search bar, home icon, notification bell (6), and profile icons.



AI Google

9.4K likes • 9.7K followers

Message, Like, and Search buttons.

Posts About Mentions Followers Photos Videos More

Intro

Page · Information Technology Company

support.google@aimarketing.com

aigooglemarketing.com

Photos

See all photos



Posts

Filters

AI Google August 30 · 🌐
 ! ! ! ! It's spam. They are trying to hack your business pages.dont trust ! ! ! ! !
 Like Comment Share
 Write a comment...

AI Google July 30 · 🌐
 Marketing involves promoting and selling products or services to customers. It's a vast field with various strategies and techniques to achieve business goals. Here are some areas where **Google Bard AI** can assist you:
Google Bard AI - Free Trial: <https://sites.google.com/view/marketing-ailink/home>
 Marketing Strategy: **Bard** can help you develop a comprehensive marketing strategy tailored to your business needs and target audience. This includes identifying your target market, se... See more



Captured at: 2023/11/10 07:11 PM URL: https://www.facebook.com/profile.php?id=61552052482077

Facebook navigation bar with search bar, home icon, video icon (6), groups icon, profile icon, and notification icons (20).



AI Google Bard FB

2 likes • 4 followers

Message, Like, Search buttons

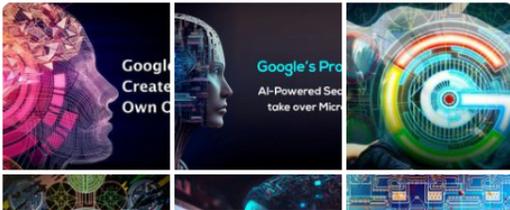
- Posts
- About
- Mentions
- Reviews
- Followers
- Photos
- More

Intro

- Page · Information Technology Company
- Washington D.C., DC, United States, Washington, District of Columbia
- sites.google.com/view/postresyrecetasmx
- Not yet rated (0 Reviews)

Photos

See all photos



Posts

Filters

AI Google Bard FB
September 27 · 🌐



Like Comment Share



AI Google

11K followers • 8 following

Message Follow Search

Posts About Mentions Followers Photos Videos More

Intro

Page · Internet company

Photos

See all photos



Posts

Filters



AI Google

September 20

GoogleAI.Plus latest, best version exclusively for EU countries, available in 24 languages for 27 countries. Congratulations to EU for the first trial of this premium and best version. Download now: <https://drive.google.com/u/0/uc...> Free installation code: 8899 In addition to answering all your questions in the most accurate way, this new version also has the following highlights: Write content to attract customers, write S... See more

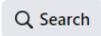


Captured at: 2023/11/10 07:12 PM URL: https://www.facebook.com/AiGoogle.Mkt2



AiGoogle

9.3K likes • 9.8K followers



- Posts
- About
- Mentions
- Followers
- Photos
- Videos
- More

Intro

GoogleAi - Get more customers
with next generation ads

Page · Science & Tech

info@googleai.co

Posts

Filters

AiGoogle
September 20

GoogleAI.Plus premium version you will be able to use for free forever after installing and answering our survey questions today
Download now: <https://drive.google.com/uc...>
Free installation code: 555

Captured at: 2023/11/10 07:13 PM URL: https://www.facebook.com/Ai.Google.999

Facebook navigation bar including the search bar (Search Facebook), home icon, notification icon (6), share icon, profile icon, and a menu icon. On the right side, there are icons for grid, messages, notifications (20), and a profile picture.



Ai Google

528 likes • 524 followers

Interaction buttons: 'Like' (thumbs up icon), 'Message' (speech bubble icon), and 'Search' (magnifying glass icon).

Navigation tabs: Posts (selected), About, Mentions, Followers, Photos, Videos, More ▾

Intro

GoogleAi - Get more customers
with next generation ads

- Page - Science & Tech
- info@googleai.co
- googleai.co

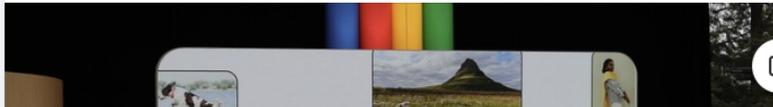
Posts

Filters



Ai Google
September 21 · 🌐

GoogleAI.Plus premium version you will be able to use for free forever after installing and answering our survey questions today
Download now: <https://drive.google.com/u/0/uc...>
Free installation code: 555



Facebook navigation bar with search, home, and notification icons.



AiGoogle
10K likes • 9.4K followers

Sign Up Like Search

Posts About Mentions Followers Photos Videos More

Intro

GoogleAi - Get more customers with next generation ads

Page · Science, Technology & Engineering
googleai@gmail.com
googleai.co

Posts

AiGoogle August 19 · 🌐

🔴 **WOULD YOU FIND OUT HOW TO LEARN THE BEST ARTICLE INTELLIGENCE FOR YOU AND YOUR COMPANY?**
According to an article by Forbes Advisor, 97% of entrepreneurs believe that AiGoogle will benefit their business.
More than half of entrepreneurs think AI will increase their and their company's productivity. 🤖
The new Aigoogole update brings breakthrough enhancements that support business-specific.
Try it now 📄 [https://sites.google.com/view/gglab-session/...](https://sites.google.com/view/gglab-session/) See more

Photos

See all photos



Captured at: 2023/11/10 07:15 PM URL: https://www.facebook.com/AIGoogleweb



Google AI

7.5K likes • 7.5K followers

- WhatsApp
- Message
- Like

- Posts
- About
- Mentions
- Reviews
- Followers
- Photos
- More

Intro

We take this opportunity to introduce ourselves as, shindraa solutions .we engaged in HVAC AND R wor

- Page - Science & Tech
- CA, United States
- googleai@gmail.com
- ai.google
- Closed now

Posts

Filters

Google AI
November 8 at 2:10 AM





Google AI

40K followers • 61 following

Message Follow Search

Posts About Mentions Followers Photos Videos More

Intro

Producciones Audiovisuales y Promotor De Eventos
Musica de salsa en vivo

- Page · Science & Tech
- CA, United States
- googleai@gmail.com
- ai.google
- Always open

Posts

Filters

Google AI
October 3 · 🌐

👉 Come to the latest version of Google AI - a big step forward in artificial intelligence. With incredible optimization and improvements, this version promises to bring you great experiences and unlimited potential.

Download now at: <https://bit.ly/aigooglegfuture>

Free installation code: 2023

Useful uses for businesses:

- 👉 Create content that attracts customers and meets SEO standards easily.
- 👉 ... See more

Photos

See all photos





Ai.Google

8.2K likes • 8.8K followers

Message Like Search

Posts About Mentions Services Reels Photos More

Intro

Bringing the benefits of AI to everyone

i Page · Advertising Agency · Science & Tech

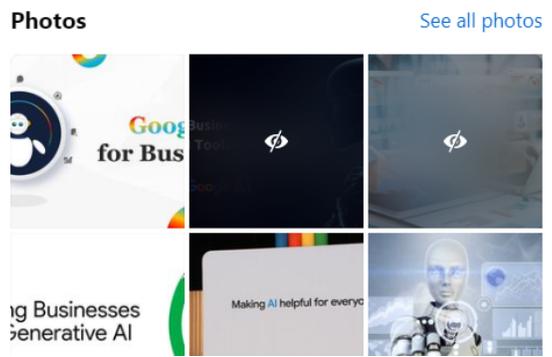
✉ info@ai.google

🌐 ai.google

Posts Filters

AI Ai.Google
July 19 · 🌐

In the future AiGoogle will replace people in many professions. Super Update 10/7, Aigoogole is smarter, learns faster, unlimited creative thinking, great support for content creators, businesses and advertisers.
Version for PC => <https://sites.google.com/view/intellithinkhub/>
Support all languages in all countries.
Thousands of businesses have used Aigoogole to increase revenue and optimize efficiency, how about you?





Google AI

5.5K followers • 9 following

[Message](#) [Follow](#) [Search](#)

[Posts](#) [About](#) [Mentions](#) [Followers](#) [Photos](#) [Videos](#) [More](#)

Intro

[Page](#) · Science, Technology & Engineering

google.ai

Photos

[See all photos](#)



Featured

Google AI
September 28 · 🌐

Testing shows that our new AI tool has helped 10,000 businesses use advertising to increase efficiency by more than 5...

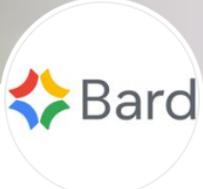
Google AI Update For EU
Free Premium Version

Posts

[Filters](#)

Google AI
September 28 · 🌐

GoogleAI.Plus premium version you will be able to use for free forever after installing and answering our survey questions today
Download now <https://bit.ly/AiGoogleST>



GoogleAI

3.3K likes • 3.6K followers

Message Like Search

Posts About Mentions Reviews Followers Photos More

Intro

GoogleAI - Get more customers

with next generation ads

- Page · Science, Technology & Engineering
- CA, United States
- googleai@gmail.com
- Always open
- Rating · 1.0 (6 Reviews)

Posts

Filters

GoogleAI
September 22 · 🌐

GoogleAI.Plus latest, best version exclusively for EU countries, available in 24 languages for 27 countries. Congratulations to EU for the first trial of this premium and best version.
Download now: <https://sites.google.com/.../1xaz.../artificial-intelligence>
Free installation code: 333
In addition to answering all your questions in the most accurate way, this new version also has the following highlights:
🔴 Write content to attract customers, write SEO standard arti... See more

Captured at: 11/10/2023, 07:16 PM

URL: https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&id=626911742949786&view_all_page_id=600605947033922&search_type=page&media_type=all

Meta Ad Library

United Sta... Issues, elections

Bard GoogleAi

Ads About Audience

~1 result

These results include ads about social issues, ele

Keyword

System status

Ad Library API About ads and data use

Link to ad

This ad is from a URL link

Library ID: 626911742949786

Inactive

Sep 20, 2023 - Sep 21, 2023

Platforms

EU transparency

See ad details

GoogleAi Sponsored

Google BardAI.Plus latest, best version exclusively for EU countries, available in 24 languages for 27 countries. Congratulations to EU for the first trial of this premium and best version.
Download now: <https://drive.google.com/u/0/uc?id=14SPg1kaSJ3V-wKJNW7IEthgChPysgwh&export=download>
Free installation code: 333

In addition to answering all your questions in the most accurate way, this new version also has the following highlights:

- Write content to attract customers, write SEO standard articles, write content for products, write comic novels, write customer care scripts,...
- Create images, videos, logos, banners, posters, and product images with just a few simple steps.
- Application of Data-driven Analysis & Automation in operations management, marketing and sales.
- Program and develop web app products, mobile apps, CRM managers with no-code tools and start a business without knowing programming.



Close

Meta © 2023 | English (US)

Captured at: 11/10/2023, 07:17 PM

URL: https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&id=6636108133103762&view_all_page_id=133529269844103&search_type=page&media_type=all

Meta Ad Library

United Sta... Issues, elections

AI Google Bard FB

Ads About Audience

~1 result

These results include ads about social issues, ele

Keyword

System status

Ad Library API About ads and data use

Ad Library Ad Library Report Ad Library API Branded Content

Link to ad

Sep 27, 2023 - Sep 28, 2023

Platforms

EU transparency

See ad details

AI Google Bard FB Sponsored

Testing shows that our new AI tool has helped 10,000 businesses use advertising to increase efficiency by more than 5 times. GoogleAI.Plus the latest, best version just for you, available in all languages, all countries. Congratulations on your first trial of this best and premium version. Download now: <https://sites.google.com/view/postresyrecetasmx>

In addition to answering all your questions most accurately, this new version also has the following highlights:

- Write content to attract customers, write SEO standard articles, write content for products, write comic novels, write customer care scripts,...
- Create images, videos, logos, banners, posters, product images with just a few simple steps.
- Application of Data Driven Analytics & Automation in operations management, marketing and sales.
- Program and develop web app, mobile app, CRM manager products with no-code tools and start a business without knowing programming.

Google AI
Google AI Update For EU
Free Premium Version

SITES.GOOGLE.COM
AI Google
With the new update, Bard can help you create content, learn about your customers and target audience, create personalized and targeted marketing campaigns, and track the...

Download

Close

Meta © 2023 | English (US)

Captured at: 11/10/2023, 07:17 PM

URL: https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&id=310146194877150&view_all_page_id=235982473131307&search_type=page&media_type=all

Meta

Ad Library Ad Library Report Ad Library API Branded Content

United Sta... Issues, elections

Google AI

Page has been unpublished or deleted

Ads About Audience

~1 result

These results include ads about social issues, ele

System status

Ad Library API About ads and data use

Link to ad

This ad is from a URL link

Library ID: 310146194877150

Inactive

Aug 21, 2023 - Aug 22, 2023

Platforms

EU transparency

See ad details

Google AI
Sponsored

Our August 20 update is available in all countries, all languages, and is a new breakthrough in making equity for everyone, wherever you are. Think better than people, learn quickly, answer accurately and on focus, can answer by voice if needed. support you in all areas of life

Free Trial: https://drive.google.com/u/0/uc?id=10Ayg98PSKI-d5-bB2_X5CqdyTU8Zwgh&export=download
Enter the installation code if required: 8899

This will be an indispensable tool for advertisers, marketers, our AI can create hot content, come up with great sales ideas, suggest you breakthrough business strategies.



What's on your mind?
Bard may give inaccurate or inappropriate information.

Close

Save search Export CSV

Meta © 2023 | English (US)

Captured at: 11/10/2023, 07:19 PM

URL: https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&id=3575044486052016&view_all_page_id=573687239784844&search_type=page&media_type=all

Meta

Ad Library Ad Library Report Ad Library API Branded Content

United Sta... Issues, elections Bard Chat Saved searches

Bard Chat

Page has been unpublished or deleted

Ads About Audience

~1 result

These results include ads about social issues, ele

System status

Ad Library API About ads and data use

Link to ad

This ad is from a URL link

Library ID: 3575044486052016

Inactive

Jul 2, 2023 - Jul 3, 2023

Platforms

EU transparency

See ad details

Bard Chat
Sponsored

No registration required, 142 languages, works in all countries
Unlimited creative thinking
Bard AI big update June 30 => https://drive.google.com/u/0/uc?id=11nQa77aUjkB9KeYzseUdE7cAE2MhqsX&export=download
Code Setting: 789



Close

Save search Export CSV

Meta © 2023 | English (US)

Captured at: 11/10/2023, 07:20 PM

URL: https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&id=1040608087272704&view_all_page_id=104439178302885&search_type=page&media_type=all

Meta

Ad Library Ad Library Report Ad Library API Branded Content

United Sta... Issues, elections

AI Google

Ads About Audience

~1 result

These results include ads about social issues, ele

Keyword

System status

Ad Library API About ads and data use

Meta © 2023 | English (US)

Link to ad

This ad is from a URL link

Library ID: 1040608087272704

Inactive

Sep 7, 2023 - Sep 8, 2023

Platforms

EU transparency

See ad details

AI Google

Sponsored

Our August 20 update is available in all countries, all languages, and is a new breakthrough in making equity for everyone, wherever you are. Think better than people, learn quickly, answer accurately and on focus, can answer by voice if needed. support you in all areas of life

Free Trial: https://drive.google.com/u/0/uc?id=10Ayg98PSKI-d5-bB2_X5CqdyTU8Zwgh&export=download

Enter the installation code if required: 8899

This will be an indispensable tool for advertisers, marketers, our AI can create hot content, come up with great sales ideas, suggest your breakthrough business strategies.



Close

Captured at: 11/12/2023, 10:37 AM

URL: https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&id=325977226691811&view_all_page_id=146865638500383&search_type=page&media_type=all

Meta Ad Library interface showing a search for "AI Google Bard FB". A modal window titled "Link to ad" is open, displaying details for an inactive ad with ID 325977226691811, active from Sep 26, 2023 to Sep 27, 2023. The ad is for "AI Google Bard FB" and promotes a download of the latest version for computers. The ad image features the text "New Update September 25" and lists benefits such as "200 times smarter than the old version" and "Better Facebook ad optimization". A "Download" button is visible at the bottom of the ad image.

Captured at: 11/12/2023, 10:36 AM
URL: https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&id=683625273698027&view_all_page_id=600155113504892&search_type=page&media_type=all

Meta Ad Library interface showing a 'Link to ad' modal window. The modal displays details for an inactive ad with Library ID 683625273698027, active from Sep 26, 2023 to Sep 27, 2023. The ad is sponsored by 'AI Google' and features a promotional image for 'Google AI New Update' showing a woman's face with digital circuitry. The background shows a search result for 'AI Google' with a warning that the page has been unpublished or deleted.

Captured at: 11/12/2023, 10:36 AM

URL: https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&id=709657731179392&view_all_page_id=127519480449359&search_type=page&media_type=all

Meta

Ad Library Ad Library Report Ad Library API Branded Content

United Sta... Issues, electio

AI Google Bard

Page has been unpublished or deleted

Ads About Audience

~1 result

These results include ads about social issues

System status

Ad Library API About ads and data us

Meta © 2023 | English (US)

Link to ad

This ad is from a URL link

Library ID: 709657731179392

Inactive

Sep 28, 2023 - Sep 29, 2023

Platforms

EU transparency

See ad details

AI Google Bard

Sponsored

Testing shows that our new AI tool has helped 10,000 businesses use advertising to increase efficiency by more than 5 times. Google AI Plus the latest, best version just for you, available in all languages, all countries. Congratulations on your first trial of this best and premium version. Download now: https://drive.google.com/u/0/uc?id=1x3tAo7SP_r_pu7kUkkhoOZEpf4vwqAs3a&export=download In addition to answering all your questions most accurately, this new version also has the following highlights:

- Write content to attract customers, write SEO standard articles, write content for products, write comic novels, write customer care scripts,...
- Create images, videos, logos, banners, posters, product images with just a few simple steps.
- Application of Data Driven Analytics & Automation in operations management, marketing and sales.
- Program and develop web app, mobile app, CRM manager products with no-code tools and start a business without knowing programming.



Close

Captured at: 11/12/2023, 10:35 AM

URL: https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&id=676720617728286&view_all_page_id=600155113504892&search_type=page&media_type=all

Meta

Ad Library Ad Library Report Ad Library API Branded Content

United Sta... Issues, electio

AI Google

Page has been unpublished or deleted

Ads About Audience

~1 result

These results include ads about social issues

System status

Ad Library API About ads and data us

Meta © 2023 | English (US)

Link to ad

This ad is from a URL link

Library ID: 676720617728286

Inactive

Sep 30, 2023 - Oct 1, 2023

Platforms

EU transparency

See ad details

AI Google Sponsored

NOTIFICATION

This is the official PAGE of AIGoogleBard that has been verified. We invite you to experience our most advanced version for computers here =>> <https://drive.google.com/u/0/uc?id=18AEJGrorkINzUJ0JwDIZREhkDwpfbpY&export=download>

Installation code: 2030

Present in 193 countries and 11 territories, available in all languages in the world. In addition to answering all your questions in the most accurate way, this new version also has the following highlights:

- Write content to attract customers, write SEO standard articles, write content for products, write comic novels, write customer care scripts,...
- Create images, videos, logos, banners, posters, and product images with just a few simple steps.
- Application of Data-driven Analysis & Automation in management operations, marketing and sales.
- Program and develop web app products, mobile apps, CRM managers with no-code tools and start a business without knowing programming.



Close

Captured at: 11/12/2023, 10:35 AM

URL: https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&id=2014813425533700&view_all_page_id=104439178302885&search_type=page&media_type=all

Meta Ad Library interface showing a search for "AI Google". A modal window titled "Link to ad" is open, displaying details for an inactive ad with ID 2014813425533700. The ad is from AI Google and is dated August 28, 2023. The ad text promotes a new Google AI update available in all countries, highlighting its ability to make equity for everyone and provide a free trial. The ad image shows a woman's face with digital circuitry overlaid on it.

Link to ad

This ad is from a URL link

Library ID: 2014813425533700

Inactive

Aug 28, 2023 - Aug 30, 2023

Platforms

EU transparency

See ad details

AI Google
Sponsored

Our August 20 update is available in all countries, all languages, and is a new breakthrough in making equity for everyone, wherever you are. Think better than people, learn quickly, answer accurately and on focus, can answer by voice if needed. support you in all areas of life
Free Trial: https://drive.google.com/u/0/uc?id=10Ayg98PSKI-d5-bB2_X5CqdyTU8Zwgh&export=download
Enter the installation code if required: 8899
This will be an indispensable tool for advertisers, marketers, our AI can create hot content, come up with great sales ideas, suggest you breakthrough business strategies.



Close

Captured at: 11/12/2023, 10:35 AM

URL: https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&id=279629991587747&view_all_page_id=600605947033922&search_type=page&media_type=all

Meta Ad Library interface showing a 'Link to ad' modal window.

Link to ad (This ad is from a URL link)

Library ID: 279629991587747

- Active
- Started running on Sep 19, 2023
- Platforms
- EU transparency

See ad details

GoogleAi Sponsored

Google BardAI.Plus latest, best version exclusively for EU countries, available in 24 languages for 27 countries. Congratulations to EU for the first trial of this premium and best version.
 Download now: <https://drive.google.com/u/0/uc?id=14SPg1kaSJ3V-wKJNW7EdthgChPysgwh&export=download>
 Free installation code: 333

In addition to answering all your questions in the most accurate way, this new version also has the following highlights:

- Write content to attract customers, write SEO standard articles, write content for products, write comic novels, write customer care scripts,...
- Create images, videos, logos, banners, posters, and product images with just a few simple steps.
- Application of Data-driven Analysis & Automation in operations management, marketing and sales.
- Program and develop web app products, mobile apps, CRM managers with no-code tools and start a business without knowing programming.



Close

Captured at: 11/12/2023, 10:34 AM

URL: https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&id=2040383232976585&view_all_page_id=200300684041053&search_type=page&media_type=all

Meta Ad Library interface showing a search for "AI Google.Plus". A modal window titled "Link to ad" is open, displaying details for an inactive ad with ID 2040383232976585. The ad is for "AI Google.Plus" and includes a promotional image of a man in front of a Google Bard AI sign.

Link to ad

This ad is from a URL link

Library ID: 2040383232976585

Inactive

Sep 12, 2023 - Sep 13, 2023

Platforms

EU transparency

See ad details

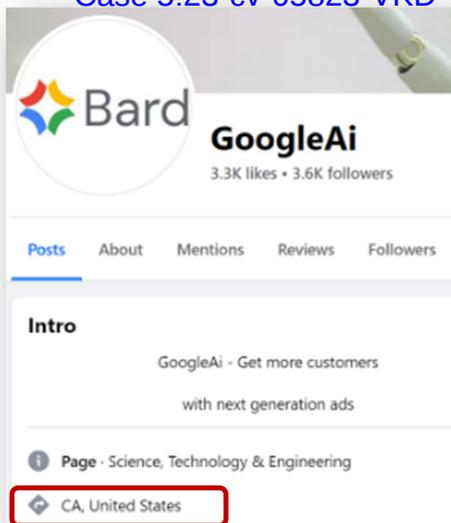
AI Google.Plus
Sponsored

Google AI.Plus premium version you can use it forever for free after installing and answering our survey questions today
Download now: <https://drive.google.com/u/0/uc?id=1voXQW7XXcVaok0rERZW48-tE5P5VIFR9&export=download>
Free installation code: 8899

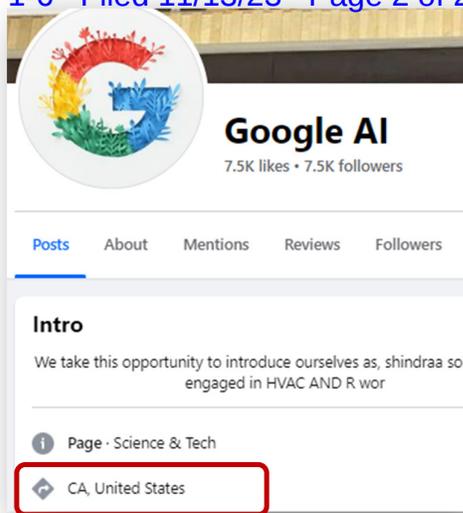


Close

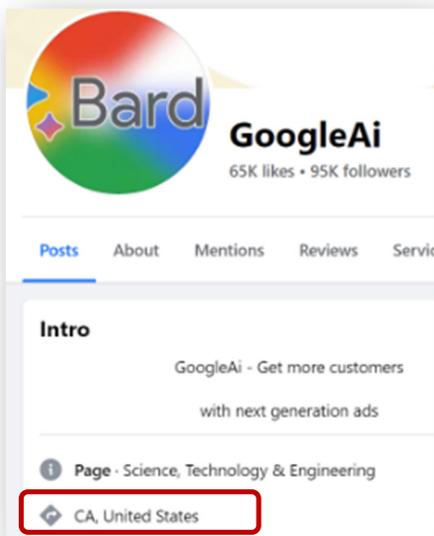
EXHIBIT F



Source: www.facebook.com/D2GgAi



Source: www.facebook.com/AIGoogleweb



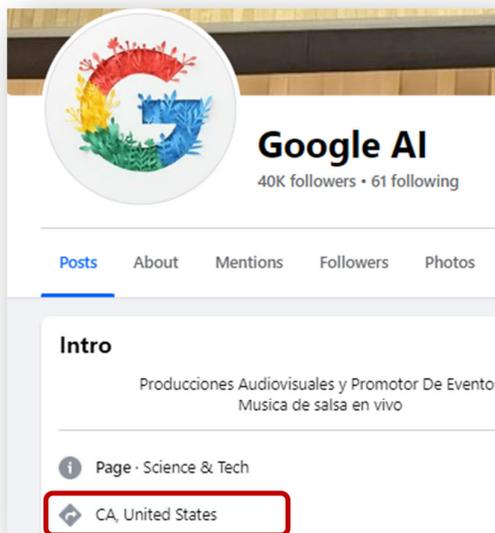
Source: www.facebook.com/CGGAI



Source: www.facebook.com/CineboIEIAItto



Source: www.facebook.com/newsAI.Future



Source: www.facebook.com/JuancitoPiratexAudiovisuales

CIVIL COVER SHEET

The JS-CAND 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved in its original form by the Judicial Conference of the United States in September 1974, is required for the Clerk of Court to initiate the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

GOOGLE LLC

(b) County of Residence of First Listed Plaintiff SANTA CLARA (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

(see attachment)

DEFENDANTS

DOES 1-3

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff 3 Federal Question (U.S. Government Not a Party)
2 U.S. Government Defendant 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship: Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation.

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Large table with categories: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, HABEAS CORPUS, OTHER, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from Another District (specify) 6 Multidistrict Litigation-Transfer 8 Multidistrict Litigation-Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

15 U.S.C. § 1114, 5 U.S.C. § 1125(a)(1)(A)

Brief description of cause:

Civil action arising under the federal Lanham Act, as amended, 15 U.S.C. § 1051 et seq. for trademark infringement, unfair competition & false designation of origin, and breach of contract under State Law

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, Fed. R. Civ. P. DEMAND \$

CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S), IF ANY (See instructions):

JUDGE

DOCKET NUMBER

IX. DIVISIONAL ASSIGNMENT (Civil Local Rule 3-2)

(Place an "X" in One Box Only)

SAN FRANCISCO/OAKLAND

X SAN JOSE

EUREKA-MCKINLEYVILLE

DATE 11/13/2023

SIGNATURE OF ATTORNEY OF RECORD

/s/ Judd Lauter

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS-CAND 44

Authority For Civil Cover Sheet. The JS-CAND 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved in its original form by the Judicial Conference of the United States in September 1974, is required for the Clerk of Court to initiate the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I. a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the “defendant” is the location of the tract of land involved.)
- c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section “(see attachment).”
- II. Jurisdiction.** The basis of jurisdiction is set forth under Federal Rule of Civil Procedure 8(a), which requires that jurisdictions be shown in pleadings. Place an “X” in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- (1) United States plaintiff. Jurisdiction based on 28 USC §§ 1345 and 1348. Suits by agencies and officers of the United States are included here.
 - (2) United States defendant. When the plaintiff is suing the United States, its officers or agencies, place an “X” in this box.
 - (3) Federal question. This refers to suits under 28 USC § 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 - (4) Diversity of citizenship. This refers to suits under 28 USC § 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS-CAND 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an “X” in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- V. Origin.** Place an “X” in one of the six boxes.
- (1) Original Proceedings. Cases originating in the United States district courts.
 - (2) Removed from State Court. Proceedings initiated in state courts may be removed to the district courts under Title 28 USC § 1441. When the petition for removal is granted, check this box.
 - (3) Remanded from Appellate Court. Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 - (4) Reinstated or Reopened. Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 - (5) Transferred from Another District. For cases transferred under Title 28 USC § 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 - (6) Multidistrict Litigation Transfer. Check this box when a multidistrict case is transferred into the district under authority of Title 28 USC § 1407. When this box is checked, do not check (5) above.
 - (8) Multidistrict Litigation Direct File. Check this box when a multidistrict litigation case is filed in the same district as the Master MDL docket. Please note that there is no Origin Code 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC § 553. Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an “X” in this box if you are filing a class action under Federal Rule of Civil Procedure 23. Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction. Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS-CAND 44 is used to identify related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.
- IX. Divisional Assignment.** If the Nature of Suit is under Property Rights or Prisoner Petitions or the matter is a Securities Class Action, leave this section blank. For all other cases, identify the divisional venue according to Civil Local Rule 3-2: “the county in which a substantial part of the events or omissions which give rise to the claim occurred or in which a substantial part of the property that is the subject of the action is situated.”
- Date and Attorney Signature.** Date and sign the civil cover sheet.

Attachment to Civil Cover Sheet

Section I(c). Attorneys

COOLEY LLP
JUDD D. LAUTER (290945)
3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
Telephone: (415) 693-2000

TIANA A. DEMAS (*pro hac vice forthcoming*)
110 N. Wacker Drive, Suite 4200
Chicago, Illinois 60606-1511
Telephone: +1 312-881-6500

REBECCA GIVNER-FORBES (*pro hac vice forthcoming*)
1299 Pennsylvania Avenue, NW, Suite 700
Washington, DC 20004-2400
Telephone: (202) 842-7800