

# EXHIBIT A

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

*Richard T. Alexander, Jr.*  
CLERK OF STATE COURT

ROTHSCHILD INVESTMENT GROUP, INC

2221 PEACHTREE RD NE STE 174

ATLANTA, GA 30309

Plaintiff's Name, Address, City, State, Zip Code

PLAINTIFF

CIVIL ACTION FILE #: 20-C-00611-S6

VS.

FACEBOOK, INC c/o REGISTERED AGENT:  
CORPORATION SERVICE COMPANY

40 TECHNOLOGY PARKWAY SOUTH STE 300

NORCROSS, GA 30092

Defendant's Name, Address, City, State, Zip Code

DEFENDANT

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

*Kevin C. Brown*  
*2221 Peachtree Rd NE #174*  
*Atlanta, GA 30309*

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 29th day of January, 2020.

Richard T. Alexander, Jr.,  
Clerk of Superior Court

By *Christina Steina*  
Deputy Clerk

INSTRUCTIONS: Attach addendum sheet for additional parties if needed, make notation on this sheet if addendum sheet is used.

STATE COURT OF GWINNETT COUNTY, GEORGIA

January 24, 2020

Case No: **20-C-00611-S6**

ROTHSCHILD INVESTMENT GROUP, INC  
2221 PEACHTREE RD NE STE 174  
Atlanta, Ga 30305

Plaintiff(s) Name, Address  
FACEBOOK, INC  
40 TECHNOLOGY PARKWAY SOUTH STE 300  
NORCROSS, GA 30092

STATEMENT OF CLAIM

*Robert J. Williams*  
CLERK OF STATE COURT

JURY TRIAL DEMANDED

Suit on Note  Suit on Account  Breach of Contract  Injury  Other

DEFENDANT IS ILLEGALLY WITHHOLDING PAYMENT S DUE TO PLAINTIFF

1. The Court has jurisdiction over the defendant(s)  the Defendant(s) is a resident of GWINNETT County;  Other (please specify)

2. Plaintiff(s) claims the Defendant(s) is indebted to the Plaintiff(s) as follows (You must include a brief statement giving reasonable notice of the basis for each claim contained in the Statement of Claim): On October 17, 2019, Plaintiff filed a Trademark Infringement Claim via Defendant's Instagram App; Help Center. On October 19, 2019, Plaintiff received a email response from Defendant's representative; "seimour" requesting " an email from address associated with the organization or additional information clarifying your authorization...". Plaintiff complied with Defendant's requests as well as providing several Cease and Deist letters in addition to filing several additional complaints with Defendant's Help Center. Defendant engaged in complicit actions by continuing to allow users of Defendant's Platform; Instagram to use of Plaintiff's Federally Registered Trademark (4556102) without written authorization after being put on notice by Plaintiff. Plaintiff is seeking a Temporary Restraining Order and Preliminary Injunction prohibiting Defendant from allowing any user(s) of Defendant's Platform(s) from illegally selling, advertising, displaying and or using Plaintiff's Registered Trademark without written permission from Plaintiff or it's legal representatives. Plaintiff's claim is brought under O.C.G.A. 10-1-390-407 allowing civil penalties up a maximum of \$5,000 per violation, O.C.G.A 10-1-450-452; Statutory Infringement and Anti-dilution statutes O.C.G.A. § 10-1-372; (4) false advertising and unfair competition under 15 U.S.C. § 1125(a) and O.C.G.A. § 10-1-390; (5) fraud and unfair competition under O.C.G.A. § 23-2-55; (6) trademark dilution in violation of O.C.G.A. § 10-1-451(b); and (7) unjust enrichment in addition to Punitive and Compensatory Damages.

3. That said claim is in the amount of \$525,000.00, principal 0.00 interest, plus attorney's fees in the amount of 0.00 pursuant to N/A, plus TBD costs to date, and all future costs of this suit.

State of Georgia, GWINNETT County:

KEVIN BROWN swears the foregoing is a just and true statement the amount owing by defendant(s) to plaintiff(s), exclusive of all set-offs and just grounds of defense.

By affixing this electronic verification, oath, or affidavit to the pleading(s) submitted to the court and attaching my electronic signature hereon, I do hereby swear or affirm that the statements set forth in the above pleading(s) are true and correct.

/s/KEVIN BROWN  
Plaintiff(s) or Agent  
(If Agent, Title or Capacity) Managing Partner  
470-454-1194  
Day Time Phone Number

NOTICE AND SUMMONS

~~TO: All Defendant(s) You are hereby notified that the above named Plaintiff(s) has/have made a claim and is requesting judgment against you in the sum shown by the foregoing statement. YOU ARE REQUIRED TO FILE or PRESENT AN ANSWER (answer forms can be obtained for the above listed web-site or clerk's office) TO THIS CLAIM WITHIN 30 DAYS AFTER SERVICE OF THIS CLAIM UPON YOU. IF YOU DO NOT ANSWER, JUDGMENT BY DEFAULT WILL BE ENTERED AGAINST YOU. YOUR ANSWER MAY BE FILED IN WRITING OR MAY BE GIVEN ORALLY TO THE JUDGE OR CLERK. If you choose to file your answer orally, it MUST BE IN OPEN COURT IN PERSON and within the 30 day period. NO TELEPHONE ANSWERS ARE PERMITTED. The court will hold a hearing on this claim at the \_\_\_\_\_ at a time to be scheduled after your answer is filed. You may come to court with or without an attorney. If you have witnesses, books, receipts, or other writings bearing on this claim, you should bring them to court at the time of your hearing. If you want witnesses or documents subpoenaed, see a staff person in the Clerk's office for assistance. If you have a claim against the Plaintiff(s), you should notify the court by immediately filing a written answer and counterclaim. If you admit to the Plaintiff(s)' claim but need additional time to pay, you must come to the hearing in person and tell the court your financial circumstances. Your answer must be RECEIVED by the clerk within 30 days of the date of service. If you are uncertain whether your answer will timely arrive by mail, file your answer in person at the clerk's office during normal business hours.~~

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

Magistrate or Deputy Clerk of Court

Control No.: 13430712

# STATE OF GEORGIA

Secretary of State  
Corporations Division  
313 West Tower  
#2 Martin Luther King, Jr. Dr.  
Atlanta, Georgia 30334-1530

## CERTIFICATE OF INCORPORATION

I, **Brian P. Kemp**, The Secretary of State and the Corporation Commissioner of the State of Georgia, hereby certify under the seal of my office that

**ROTHSCHILD INVESTMENT GROUP, INC**  
a Domestic For-Profit Corporation

is hereby issued a CERTIFICATE OF INCORPORATION under the laws of the State of Georgia on **July 07, 2013** by the filing of all documents in the Office of the Secretary of State and by the paying of all fees as provided by Title 14 of the Official Code of Georgia Annotated.

WITNESS my hand and official seal in the City of Atlanta and the State of Georgia on July 16, 2013



*B. P. Kemp*

Brian P. Kemp  
Secretary of State

# United States of America

United States Patent and Trademark Office



**Reg. No. 4,556,102**

**Registered June 24, 2014**

**Int. Cl.: 25**

**TRADEMARK**

**PRINCIPAL REGISTER**

ROTHSCHILD INVESTMENT GROUP, INC. (GEORGIA CORPORATION)  
315 PHARR RD STE A  
ATLANTA, GA 30305

FOR: SHORT-SLEEVED OR LONG-SLEEVED T-SHIRTS; T-SHIRTS; T-SHIRTS FOR WOMEN,  
IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 1-14-2013; IN COMMERCE 1-14-2013.

THE MARK CONSISTS OF INTERTWINING "SP" IN STYLIZED FONT.

SER. NO. 86-975,102, FILED 9-12-2013.

KATHERINE E. HALMEN, EXAMINING ATTORNEY



*Michelle K. Lee*

Deputy Director of the United States  
Patent and Trademark Office

# DEFENDANT'S COUNTERFEIT APPAREL

beaniesigelsp



13,569 likes

beaniesigelsp I'm Back To The Block With It Wait Let Me Clear That Up! NEW SP MERCH FOLLOW

@foreverdomeclothing CLICK THE LINK IN THEY BIO

View all 325 comments

neef\_buck OSS! 🤔

marclamonthill 💧💧💧

← Posts

beaniesigelsp



3,626 likes

beaniesigelsp New Merch #stateproperty X

@foreverdomeclothing Collaboration PURCHASE NOW

(Link In There Bio)

foreverdomeclothing.com

October 14, 2019

beaniesigelsp



21,527 likes

beaniesigelsp I'm a C-E-O nigga

Clothing line, cartoons, movies, name it nigga Bullshit with rap if you want,

I'm a big boy toy driver nigga

With unlaced air force 1's with no license! @neef\_buck



k brown <emailkevinbrown@yahoo.com>  
to ip@fb.com, legal@fb.com, me, Kevin, support@fb.com, legal@fb.com

Tue, Oct 22, 2019, 2:45 PM ☆ ↶ ⓘ

October 22, 2019

3rd and Final Notification

Re: Unauthorized Registered-US Federal Trademark, 4566102 Infringement

It has come to our attention that unauthorized and or counterfeit images are being advertised on [Instagram.com](https://www.instagram.com) pages: @beaniesigelsp and @neef\_buck @\_stateproperty @foreverdomeclothing containing our company's federally trademarked and registered logo without authorization.

The pages which we understand are controlled by Dwight Grant p/k/a "Beanie Sigel" and Hanif Muhammad p/k/a "Neef Buck". Please be advised that these images contain the sale and solicitation of unauthorized counterfeit merchandise & the infringement of our federally registered SP mark and was created without our company's authorization, knowledge or consent and is extremely damaging to our mark.

Your allowed intentional publication of the images after this notification will likely injure our reputation/ good name and excite adverse and derogatory opinions against our mark. The images are obviously unauthorized in nature and we will not tolerate its continued use.

Further, use of the unauthorized images infringes upon the trademark rights in that it unlawfully depicts our registered trademark, which are protected under various unfair competition and trademark laws and have been used by our company for many years.

Based on the foregoing, we demand that you IMMEDIATELY cease and desist from all further display, use and publication of the registered "SP" image on all associated Instagram and Facebook servers, accounts and platforms.

If you fail to comply with these demands, please be assured that we will vigorously protect our rights and will take all action necessary, including but not limited to, bringing a claim for damages and/or injunctive relief. Nothing in this letter shall be construed as limiting, in anyway, legal/ equitable rights.

Please be advised that any attempts to market, promote any Merchandise and/or any physical goods containing our company's "SP" mark at any upcoming posts, will include all infringing parties.

All Federal government entities as needed will be contacted as well as providing the name(s) of all individual(s) willfully participating in the infringement, including the DCMA, IRS and FCC.

Your prompt attention to this matter is appreciated.

Sincerely,

Kevin Brown

President, Rothschild Investment Group, Inc

Bleuhouse Brands, LLC

<case1+aa2q4ttesivtw@support.facebook.com> wrote:

Hi,

Thanks for your report. Based on the information you have provided, it is not clear to us that you are the rights owner or are otherwise authorized to submit this report.

To help us confirm that you're authorized to report, please email [ip@fb.com](mailto:ip@fb.com) from an email address associated with the organization or provide us with additional information clarifying your authorization to submit this report. Please reference this report number in your email.

Once we receive this information, we will review this matter further.

Thanks,

Chuy  
Facebook

>On Wed Oct 23, 2019 11:20:26, original message wrote:

>The Facebook Team received a report from you. For reference, your complaint number is:434237003944294.

>

>Please note that this channel is only for reports of alleged infringements or violations of your legal rights, such as copyright or trademark. If you filed that type of report, no further action is necessary. However, if you contacted us through this channel about another matter, you might not receive a response.

>If you're not confident that your issue concerns intellectual property rights, please consult the Intellectual Property section of our Help Center for additional information:

>IP Help Center: <https://www.facebook.com/help/intellectual-property/>

>Please note that we regularly provide the rights owner's name, your email address and the nature of your report to the person who posted the content you are reporting. You may wish to provide a professional or business email address for contact by users.

>For help with matters other than infringement/violation of your legal rights, the links below may be helpful:

>- Hacked accounts: <https://www.facebook.com/help/131719720390233>

>- Fake/Impostor accounts (timelines): <https://www.facebook.com/help/174210519303259/>

>- Abuse (including spam, hate speech and harassment): <https://www.facebook.com/help/263149623790594/>

>- Pages (including admin issues): <https://www.facebook.com/help/pages/>

>- Unauthorized photos or videos: <https://www.facebook.com/help/428478523882899>

>- Login issues: <https://www.facebook.com/help/login/>

>- Help for users who have been disabled or blocked: <https://www.facebook.com/help/warnings/>

>If the links above do not contain the information you're looking for, you may want to search the Help Center for more assistance: <https://www.facebook.com/help/>

>As a reminder, if your submission contains a report of alleged infringement/violation of your legal rights, no further action is necessary. We will look into your matter shortly.

>Thanks for contacting Facebook.

>The Facebook Team

>

>October 23, 2019

>re: 518760898686069

>We have communicated with you from our registered email address (as well a personal and management address: [bleuhousebrands@gmail.com](mailto:bleuhousebrands@gmail.com)) with the USPTO and provided a copy of our Registered trademark.

>I have affirmed my position as Managing Partner and CEO of Rothschild Investment Group a Georgia corporation.

>If you do not remove the infringing and damaging post and images from the reported Instagram accounts and your servers within 24 hours, we will seek legal action!

>Kevin Brown Managing Partner Rothschild Investment group Inc Bleu House Brands LLC

>



Civil Action No. 20-C-00611-56  
Date Filed 2/4/20

Magistrate Court   
Superior Court   
State Court   
Georgia, Gwinnett County

Attorney's Address  
2221 Peachtree Rd #174  
Atlanta, GA 30309

Rothschild Investment Group, Inc  
Plaintiff  
VS.  
Facebook, Inc.

Name and Address of party to be served.  
Facebook, Inc c/o Registered Agent:  
Corporation Service Company  
40 Technology Parkway South Ste 300  
Norcross, GA 30092

Defendant  
Garnishee

**Sheriff's Entry Of Service**

Personal  I have this day served the defendant \_\_\_\_\_ personally with a copy of the within action and summons.

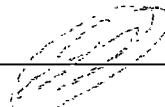
Notorious  I have this day served the defendant \_\_\_\_\_ by leaving a copy of the action and summons at his most notorious place of abode in this County.  
Delivered same into hands of \_\_\_\_\_ described as follows age, about \_\_\_\_\_ years; weight, about \_\_\_\_\_ pounds; height, about \_\_\_\_\_ feet and \_\_\_\_\_ inches; domiciled at the residence of defendant.

Corporation  Served the defendant Facebook Inc a corporation by leaving a copy of the within action and summons with Alicia Smith in charge of the office and place of doing business of said Corporation in this County.

Tack & Mail  I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class in an envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

Non Est  Diligent search made and defendant \_\_\_\_\_ not to be found in the jurisdiction of this Court.

This 6 day of FEB, 2020.

  
Deputy

Sheriff Docket \_\_\_\_\_ Page \_\_\_\_\_

Gwinnett County, Georgia

WHITE: Clerk      CANARY: Plaintiff / Attorney      PINK: Defendant