

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

**BRAVADO INTERNATIONAL GROUP §
MERCHANDISING SERVICES, INC., §**

Plaintiff, §

CIVIL ACTION NO. 4:26-cv-04614 §

vs. §

**JOHN DOES 1-100, JANE DOES 1-100, §
and XYZ COMPANY, §**

Defendants. §

**PLAINTIFF’S EX PARTE APPLICATION FOR: TEMPORARY RESTRAINING
ORDER; SEIZURE ORDER; AND ORDER TO SHOW CAUSE WHY A
PRELIMINARY INJUNCTION AND SEIZURE ORDER SHOULD NOT ISSUE**

Plaintiff Bravado International Group Merchandising Services, Inc. (“Plaintiff”) applies to and moves this Court, pursuant to Federal Rules of Civil Procedure, Rule 65, Lanham Act 15 U.S.C. § 1051 et. seq., and the All Writs Act 28 U.S.C. § 1651 to issue the attached proposed Temporary Restraining Order, Seizure Order and an Order to Show Cause Why A Preliminary Injunction and Seizure Order Should Not Issue against defendants.

This application is based upon the fact that Plaintiff has the exclusive right to sell authorized tour merchandise bearing the federally registered trademarks, service marks, likenesses, logos and other indicia of the performer known as the “A\$AP ROCKY” (the “Artist”) in connection with his tour. Defendants, as known as “Bootleggers” and those acting in active concert and participation with them will sell unauthorized merchandise also known as “Infringing Merchandise” or “Bootleg Merchandise” (such as t-shirts and jerseys) at the concerts of the Artist, including but not limited to the concert on June 20, 2026 at the Toyota Center in Houston, Texas. The Bootleg Merchandise will bear the federally registered trademarks, service marks, likenesses,

logos and other indicia of the Artist without license or authority from the Plaintiff. The sale and distribution of this Bootleg Merchandise will irreparably harm the Plaintiff and is against the public interest. The Artist's tour has just begun and so have Defendants' infringing activities.

In support of this application/motion, Plaintiff files the Declaration of Ashley Fogerty, Certificate of Counsel/Conference of Cara R. Burns, Memorandum of Points and Authorities, Complaint and other supporting pleadings and proceedings as may be considered by the Court.

WHEREFORE, Plaintiff respectfully requests that the Court enter the proposed Temporary Restraining Order, Seizure Order, and an Order to Show Cause Why A Preliminary Injunction and Seizure Order Should Not Issue.

Dated: June 11, 2026

Respectfully Submitted,

By: /s/ Cara R. Burns
Cara R. Burns, Esq.
Attorney-In-Charge
Southern District of Texas Bar No. 111129
State Bar No. (CA) 137557
Mims, Kaplan, Burns & Garretson
28202 Cabot Road, Ste 300
Laguna Niguel, California 92677
Tel: (310) 314-1721
Fax: (949) 340-9737