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HYDE LANE, INC.
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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**
12

13 HYDE LANE, INC. dba DEMON
14 HUNTER, a Washington corporation,

15 Plaintiff,
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17 v.

18 NETFLIX, INC., a Delaware corporation,
19 NETFLIX STUDIOS, LLC, a Delaware
corporation, AEG PRESENTS LLC; and
20 DOES 1-10, inclusive,

21 Defendants.
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Case No.

COMPLAINT FOR
(1) TRADEMARK
INFRINGEMENT
(15 U.S.C. § 1114);
(2) FALSE DESIGNATION OF
ORIGIN (15 U.S.C. §
1125(a));
(3) STATUTORY UNFAIR
COMPETITION (CAL. BUS.
& PROF. CODE § 17200);
AND
(4) COMMON LAW UNFAIR
COMPETITION

DEMAND FOR JURY TRIAL

1 Plaintiff Hyde Lane, Inc. dba Demon Hunter (“Hyde Lane” or “Plaintiff”), by
2 and through its attorneys, complains against Defendants Netflix, Inc. (“Netflix”),
3 Netflix Studios, LLC (“Netflix Studios”) and AEG Presents LLC (“AEG”)
4 (collectively, “Defendants”) and DOES 1-10, inclusive (collectively,
5 “Defendants”), alleging as follows:

6 1. This lawsuit is a classic case of massive companies that jealously
7 guard and enforce their own intellectual property rights willfully disregarding the
8 rights of others in pursuit of profits.

9 2. Defendant Hyde Lane is the corporate entity of Demon Hunter, a well-
10 known and celebrated metal band. Demon Hunter was formed at the turn of the
11 century and, in the quarter-century since, it has consistently released albums,
12 toured, and sold merchandise to a large and dedicated audience. Unfortunately, in
13 2025, Netflix and Netflix Studios—despite almost certainly being aware of Demon
14 Hunter—chose to release a movie titled *KPop Demon Hunters*. *KPop Demon*
15 *Hunters* reached unprecedented levels of success, not only as a film on Netflix’s
16 streaming service, but also via the *KPop Demon Hunters* movie soundtrack album
17 and merchandise. Even more troublingly, Netflix and Netflix Studios have recently
18 announced their partnership with AEG for the launch of a live *KPop Demon*
19 *Hunters* global concert tour spanning some 150 cities. In short, in just a year’s
20 time, Defendants have taken step after step to move into almost complete overlap
21 with the goods and services offered by Hyde Lane under the DEMON HUNTER
22 mark.

23 3. As a result of their adoption and exploitation of the *KPop Demon*
24 *Hunters* brand, which is confusingly similar to senior user Hyde Lane’s established
25 DEMON HUNTER mark, junior users Netflix, Netflix Studios, and AEG have
26 created a substantial likelihood of confusion (and, indeed, actual confusion has
27 already resulted), leading consumers to believe the parties’ goods or services are
28 affiliated, sponsored, or otherwise connected with one another.

1 4. The resulting confusion runs both in forward and reverse. Consumers
2 may mistakenly attribute Defendants' goods or services to Hyde Lane, causing
3 Hyde Lane to bear the reputational and commercial consequences of Defendants'
4 conduct and allowing Defendants to divert consumers and appropriate the goodwill
5 that Hyde Lane has built in its DEMON HUNTER marks. At the same time, and
6 even more devastatingly, by leveraging their superior resources and reach,
7 Defendants can, and do, eclipse Hyde Lane's DEMON HUNTER marks in the
8 marketplace and effectively misappropriate the marks' source-identifying
9 significance. Thus, Defendants' greater size and strength overwhelms Hyde Lane's
10 established identity, causing consumers to perceive Hyde Lane as affiliated with,
11 sponsored by, or derived from Defendants and denuding Hyde Lane of power over
12 its commercial fate.

13 5. The resulting fait accompli constitutes a troubling inversion of
14 trademark priority. Despite having established the mark first and invested in the
15 goodwill associated with it for decades, Hyde Lane—the senior user—has
16 effectively been forced to surrender control over its commercial identity simply
17 because Defendants have greater resources and a larger marketplace footprint.
18 Where, as here, a junior user's adoption of a similar mark creates both the
19 traditional risk that consumers will mistake the junior user for the senior user and
20 the reverse risk that consumers will mistake the senior user for the junior user, the
21 likelihood of confusion—and the resulting injury to the senior user Hyde Lane's
22 trademark rights—is particularly pernicious, leaving Hyde Lane with no choice but
23 to have to seek relief from this Court to restore its rightful interests in its trademarks
24 and the goodwill associated therewith.

25 **JURISDICTION AND VENUE**

26 6. This is a civil action against Defendants for trademark infringement in
27 violation of Section 32 of the Lanham Act, 15 U.S.C. § 1114, false designation of
28 origin in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), and

1 statutory and common law unfair competition under California law.

2 7. This Court has federal question subject matter jurisdiction over this
3 action under the provisions of 15 U.S.C. § 1121 (original jurisdiction over Lanham
4 Act claims), 28 U.S.C. § 1331 (federal question), and 28 U.S.C. § 1338 (jurisdiction
5 to adjudicate claims of federal trademark infringement) because the complaint
6 alleges violations of the federal trademark statutes, and it has supplemental
7 jurisdiction over the remaining claims pursuant to 28 U.S.C. § 1367 because they
8 arise from the same nucleus of operative facts as Plaintiff's claims under the
9 Lanham Act.

10 8. This Court has personal jurisdiction over Defendants, each of which is
11 doing business in and is headquartered in California/this District.

12 9. Netflix is registered to do business in the state of California with a
13 principal business address of 121 Albright Way, Los Gatos, CA 95032.

14 10. Netflix Studios is registered to do business in the state of California
15 with a principal business address of 5808 Sunset Blvd., 11th Floor, Los Angeles,
16 CA 90028.

17 11. AEG is registered to do business in the state of California with a
18 principal business address of 800 W. Olympic Blvd Ste. 305, Los Angeles, CA
19 90015.

20 12. Defendants have each engaged in violations of the Lanham Act and
21 common law and statutory unfair competition in this judicial district. Upon
22 information and belief, Netflix and Netflix Studios have chosen to direct their
23 infringing activities at California, including by advertising and enticing California
24 residents in this district to purchase infringing goods. Upon information and belief,
25 Defendants have chosen to direct their infringing activities at California by
26 advertising the infringing services to California residents, including in this district.
27 Accordingly, and upon information and belief, Defendants derive substantial
28 revenues from commercial activities in California and this district. As a result,

1 besides Defendants’ active and purposeful engagement with, and substantial,
2 continuous and systematic business ties to, California and this District, there is a
3 direct and substantial nexus between Plaintiff’s claims in this case and Defendants’
4 purposeful availment of the privilege of conducting activities within California and
5 in this district.

6 13. Venue is proper in this District under 28 U.S.C. § 1391(b) and (c) in
7 that the claim arises in this judicial district, Defendants transact business in this
8 judicial district, the injury suffered by Plaintiffs took place in this judicial district,
9 and a substantial part of the events giving rise to the claim occurred in this district.

10 14. Defendants are subject to the general and specific personal jurisdiction
11 of this Court because of their contacts with the State of California, as detailed
12 above.

13 **PARTIES**

14 15. Hyde Lane is a Washington corporation, with its principal place of
15 business in Maple Valley, Washington.

16 16. Netflix is a Delaware corporation registered to do business in
17 California, with its principal place of business located in Los Gatos, California.

18 17. Netflix Studios is a Delaware corporation registered to do business in
19 California, with its principal place of business located in Los Angeles, California.

20 18. AEG is a Delaware corporation registered to do business in California,
21 with its principal place of business located in Los Angeles, California

22 19. DOES 1 through 10, inclusive, are unknown to Plaintiff, who therefore
23 sue said Defendants by such fictitious names. Plaintiff will ask leave of Court to
24 amend this Complaint and insert the true names and capacities of said Defendants
25 when the same have been ascertained. Plaintiff is informed and believes, and upon
26 such alleges, that each of the Defendants designated herein as a “DOE” is legally
27 responsible in some manner for the events and happenings herein alleged, and that
28 Plaintiff’s damages as alleged herein were proximately caused by such Defendants.

20. Plaintiff is informed and believes, and based thereon alleges, that at all times relevant hereto, each of the Defendants was the agent, alter-ego, servant, or employee of the remaining Defendants, and each was acting within the course and scope of such agency/employment relationship and with the knowledge and consent of the remaining Defendants.

STATEMENT OF FACTS

Plaintiff's Decades Long History as a Popular and Celebrated Band

21. Hyde Lane is the official corporate entity of the noted American metal band Demon Hunter, and it is the owner of all rights, title and interest in the trademarks of the band, including but not limited to the registered Marks (as defined *infra*).

22. Demon Hunter was formed in Seattle, Washington in 2000 by brothers Ryan Clark and Don Clark. Although Don Clark left the band in 2009, Ryan Clark remains an active member of the band and has served continuously as the band's vocalist, lyricist, primary songwriter, and chief creative force.

23. Mr. Clark's teenage hardcore band signed a record deal when he was just 16, launching a multidisciplinary career in music, the arts and branding that now spans more than three decades, and, over the years, he has overseen Demon Hunter's success as it toured throughout North America, South America, Europe, and Australia while achieving multiple Billboard milestones, including No. 1 albums on the Independent and Christian Albums charts and Top 10 debuts across the Rock, Album Sales, and Current Albums charts.

24. Outside of his career as a musician, Mr. Clark is also a creative director, designer, and brand strategist whose work has helped define brands and visual identities for organizations including NASA, Apple, Amazon, Nike, and Starbucks, and artists including Alice in Chains, Foo Fighters, and Kendrick Lamar, among many others.

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1 25. A two-time GRAMMY Award nominee, Mr. Clark is one of the few
2 creatives to build a career at the highest levels of both music and branding, earning
3 a reputation for combining bold creative vision with strategic thinking to help
4 businesses and artists communicate with clarity, authenticity, and lasting impact.

5 26. As Demon Hunter’s frontman, Mr. Clark undertakes writing,
6 recording, performing, touring, merchandising, branding, and creative directing,
7 bringing decades of professional experience to every aspect of his work while
8 remaining committed to producing work that is meaningful, purposeful, and
9 enduring.

10 27. As a result, under Mr. Clark’s careful tutelage, Demon Hunter has,
11 since its formation, become one of the most successful and enduring bands in
12 Christian heavy metal music. Blending metalcore, groove metal, melodic death
13 metal, and alternative metal, Demon Hunter has built a successful career spanning
14 almost a quarter of a century—consistently releasing new albums and touring
15 throughout the U.S. and internationally. During the intervening years, Demon
16 Hunter has shared festival stages with such metal and hard rock luminaries as Ozzy
17 Osbourne, KISS, Foo Fighters, Guns N’ Roses, Alice Cooper and others.

18 28. Demon Hunter’s debut single, “Through the Black,” was released in
19 February 2002, and its first studio album, *Demon Hunter*, followed later that
20 October. The album received positive reviews and gained attention both within the
21 Christian music industry and the broader metal community.

22 29. Following the release of its debut album, Demon Hunter embarked on
23 its first national tour.

24 30. In the years since, Demon Hunter has been prolific in both its
25 recording work and live touring. It has continued to released numerous new
26 albums—including *Summer of Darkness* (2004), *The Triptych* (2005), *Storm the*
27 *Gates of Hell* (2007), *The Word Is a Thorn* (2010), *True Defiance* (2012), *Extremist*
28 (2014), *Outline* (2017), *War* (2019), *Peace* (2019), *Exile* (2022), and *There Was a*

1 *Light Here* (2025)—to positive reviews and growing success. For example,
2 *Extremist* debuted at No. 16 on the Billboard 200, becoming the highest-charting
3 album the band had released at the time.

4 31. In between these full-length album releases featuring new materials,
5 Demon Hunter also released its first live album, *Live in Nashville* (2009), and it
6 documented its Stronger Than Hell Tour in the *45 Days* box set, a 3-disc
7 audio/visual collection that included two DVDs and one CD consisting of full-
8 length documentary, a live concert film, behind-the-scenes footage, and a
9 soundtrack, which was released in 2008.

10 32. Additionally, Demon Hunter has accompanied its recording and live
11 work with other related projects. For example, the album *Exile* was accompanied
12 by an ambitious multimedia project that included a companion comic book,
13 reflecting founder Ryan Clark's longstanding interest in visual art and storytelling.
14 The Deluxe Edition of *Exile*, a graphic novel (a collection of four issues of the
15 comic books), remains available for purchase today through numerous other
16 retailers under the title “Demon Hunter: Exile – Graphic Novel.”

17 33. Over time, Demon Hunter has continued to tour through North
18 America and, indeed, internationally, playing its own headline shows and major
19 festivals to millions of fans, both from the Christian metal music scene and more
20 mainstream metal audiences.

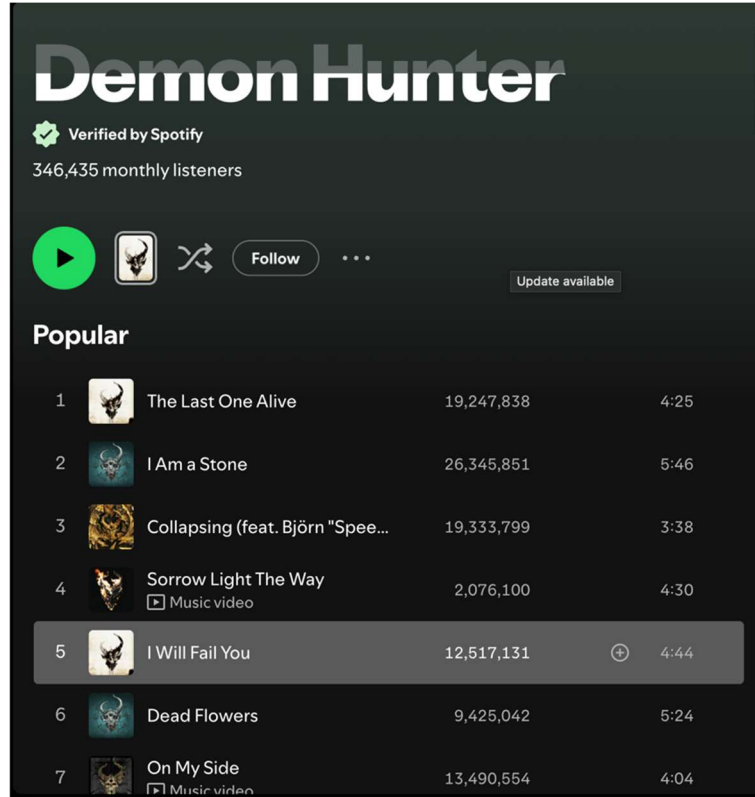
21 34. Over its multi-decade history, Demon Hunter has firmly established
22 itself as one of the most iconic and celebrated Christian metal bands of all time.
23 Demon Hunter’s consistent output of acclaimed albums, thoughtful artistic
24 evolution, and a carefully curated touring career has earned it a devoted fan base
25 and immense popularity, both in the United States and around the world.

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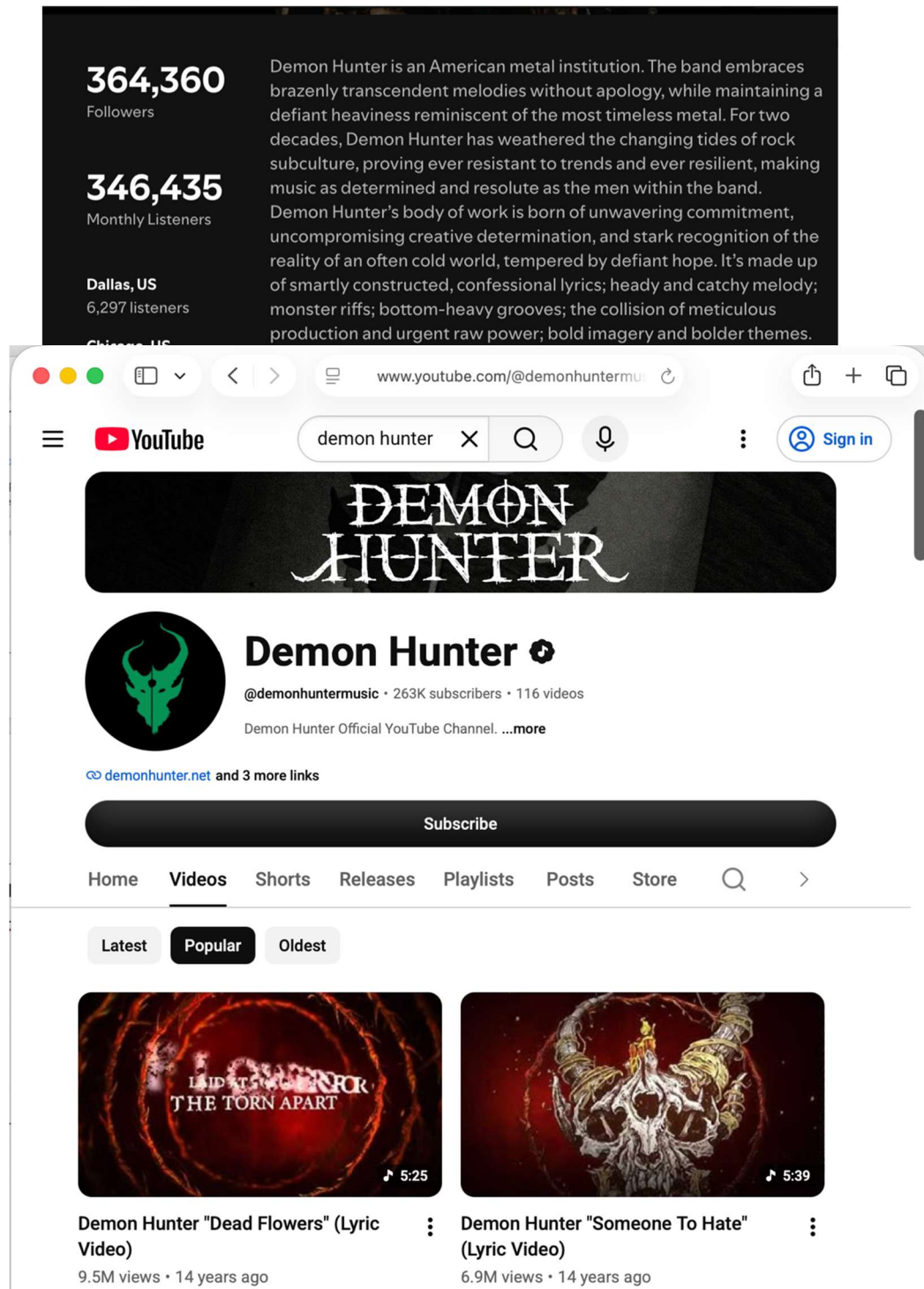
35. For example, on Spotify—the largest streaming music service in the U.S. and the world—Demon Hunter has over 363,000 followers, 348,000 monthly listeners, and its most popular seven songs have a cumulative of over *one hundred million listens*:



(Screenshot captured on July 28, 2026).

36. As described in the band profile on Spotify: “Demon Hunter is an American metal institution. The band embraces brazenly transcendent melodies without apology, while maintaining a defiant heaviness reminiscent of the most timeless metal. For two decades, Demon Hunter has weathered the changing tides of rock subculture, proving ever resistant to trends and ever resilient, making music as determined and resolute as the men within the band. Demon Hunter's body of work is born of unwavering commitment, uncompromising creative determination, and stark recognition of the reality of an often cold world, tempered by defiant hope. It's made up of smartly constructed, confessional lyrics; heady and catchy melody; monster riffs; bottom-heavy grooves; the collision of meticulous production and urgent raw power; bold imagery and bolder themes. *There Was A*

1 *Light Here*, the band's 12th album, arrived September 12, 2025.” (emphasis added).
 2 (Screenshot captured on July 28, 2026).

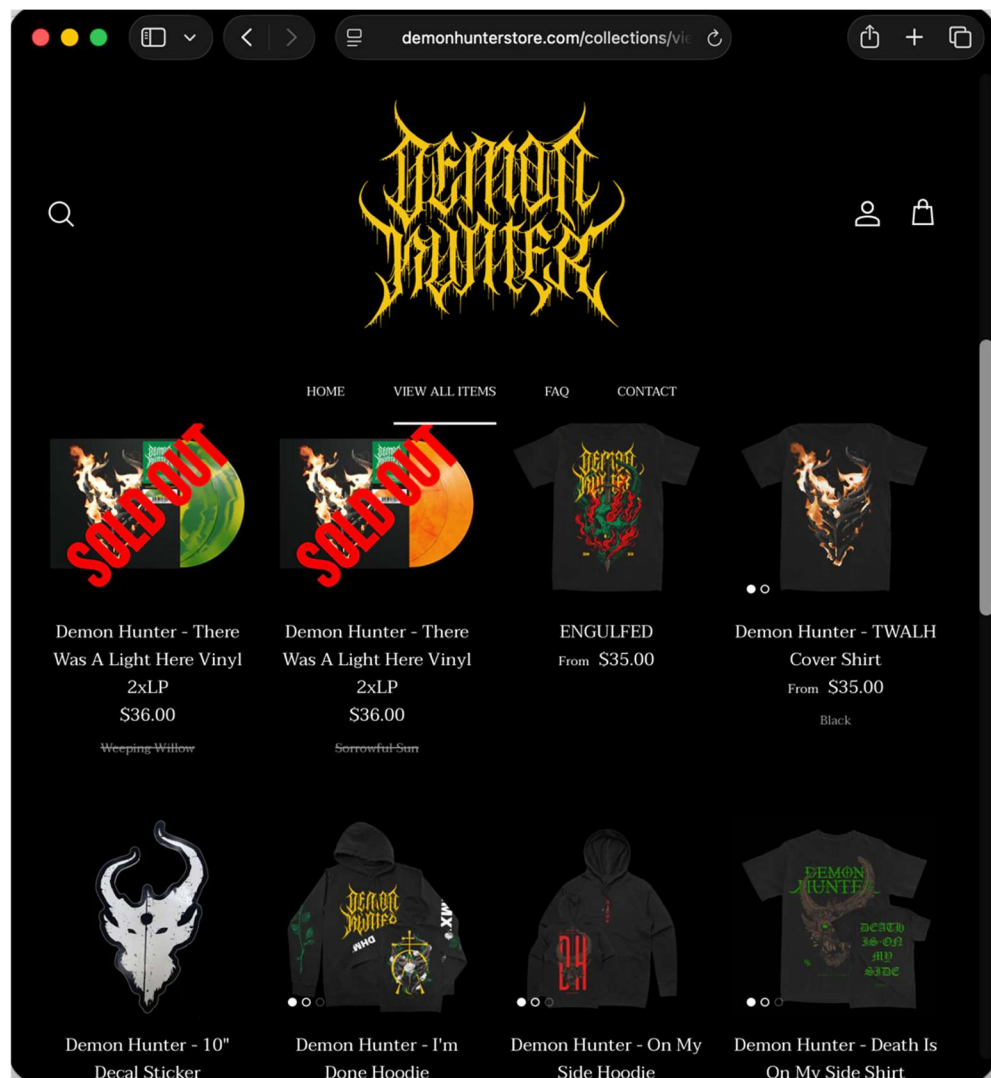


37. Demon Hunter is not only popular for its recorded music and live
 27 performances, but also for its audiovisual content. As described above, the *45 Days*
 28 box set included several pieces of audiovisual content. Additionally, Demon

Hunter has a monthly audience of 334,000 on YouTube Music and its YouTube channel features 116 videos, many with millions of views, and it boasts more than 263,000 subscribers:

(Screenshot captured on July 28, 2026).

38. Besides providing live performance services in interstate commerce, since at least as early as 2001, Demon Hunter has also offered for sale, and has sold, a variety of types of merchandise in interstate commerce under the DEMON HUNTER mark, including, but not limited to, vinyl albums, CDs, clothing, and posters, as illustrated in the screenshot from Demon Hunter's online merchandise



store below:

(Screenshot captured on July 28, 2026).

1 39. In total, over the past quarter-century, Demon Hunter has sold more
2 than one million albums and streaming equivalent albums (SEA) in the United
3 States alone, played more than 300 major concerts, and entertained millions,
4 earning widespread recognition and appreciation of fans throughout the United
5 States (and internationally).

6 ***Plaintiff's Trademarks and Continuous Use Thereof***

7 40. Hyde Lane is the registered owner of the trademark DEMON
8 HUNTER, registered with the U.S. Trademark and Trademark Office ("USPTO")
9 as Registration No. 6607085, with a registration date of January 4, 2022 in
10 International Class 009 for "Audio recordings featuring music; Digital media,
11 namely, pre-recorded DVDs, downloadable audio and video recordings, and CDs
12 featuring and promoting music; Downloadable audio recordings featuring music;
13 Downloadable musical sound recordings; Musical recordings; Pre-recorded CDs
14 featuring music; Pre-recorded record albums featuring music."

15 41. Hyde Lane has continuously used its inherently distinctive DEMON
16 HUNTER mark (Reg. No. 6607085), which has also acquired secondary meaning in
17 the marketplace, to distinguish its goods and services from those of others in
18 connection with International Class 009 since at least as early as February 26, 2002,
19 as stated in its issued registration, when DEMON HUNTER was used in connection
20 with the release, sale, licensing, and offering for sale and licensing of the song
21 "Through the Black" in interstate commerce.

22 42. Hyde Lane is the owner of the trademark DEMON HUNTER,
23 registered with the USPTO as Registration No. 6607086, with a registration date of
24 January 4, 2022, in International Class 016 for "Decals; Stickers; Magnetic bumper
25 stickers; Posters made of paper; Printed tickets; Printed calendars; Printed event
26 programs; Printed photographs; Printed posters; Printed wall calendars; Unmounted
27 printed posters."

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1 43. Hyde Lane has continuously used its inherently distinctive DEMON
2 HUNTER mark (Reg. No. 6607086), which has also acquired secondary meaning in
3 the marketplace, to distinguish its goods and services from those of others in
4 connection with International Class 016 since at least as early as March 1, 2001, as
5 stated in its issued registration, when Hyde Lane began selling and offering for sale
6 paper goods and printed matter in connection with the DEMON HUNTER mark in
7 interstate commerce.

8 44. Hyde Lane is the owner of the trademark DEMON HUNTER,
9 registered with the USPTO as Registration No. 6607087, with a registration date of
10 January 4, 2022, in International Class 025 for “Coats; Dresses; Footwear; Gloves;
11 Headwear; Loungewear; Neckwear; Nightwear; Pants; Scarves; Shirts; Shoes;
12 Shorts; Skirts; Sleepwear; Socks; Sweaters; Underclothes; Belts; Bottoms as
13 clothing; Jackets; Tops as clothing.”

14 45. Hyde Lane has continuously used its inherently distinctive DEMON
15 HUNTER mark (Reg. No. 6607087), which has also acquired secondary meaning in
16 the marketplace, to distinguish its goods and services from those of others in
17 connection with International Class 025 since at least as early as March 1, 2001, as
18 stated in its issued registration, when Hyde Lane began selling and offering for sale
19 clothing in connection with the DEMON HUNTER mark in interstate commerce.

20 46. Hyde Lane was the registered owner of the trademark DEMON
21 HUNTER, registered with the USPTO as Registration No. 4584097, with a
22 registration date of August 12, 2014, in International Class 041 for “[
23 Entertainment, namely, live performances by a musical band].”

24 47. Hyde Lane has been continuously making use of said inherently
25 distinctive mark, which has also acquired secondary meaning in the marketplace, to
26 distinguish its goods and services from those of others in interstate commerce since
27 at least as early as March 1, 2001, as stated in its previously issued registration,
28 when Hyde Lane began offering entertainment services in connection with the

1 DEMON HUNTER mark. Registration Number 4584097 was cancelled on
2 February 28, 2025 due to an inadvertent failure to timely file the requisite Section 8
3 and 9 Declaration.

4 48. To seek registration of its inadvertently cancelled DEMON HUNTER
5 mark in connection with International Class 041, Hyde Lane filed, and is the owner
6 of, a pending trademark application for DEMON HUNTER, filed with the USPTO
7 as Serial No. 99528509, with a filing date of December 13, 2025 in International
8 Class 041 for “Entertainment services in the nature of live musical performances;
9 Entertainment services in the nature of live vocal performances by musical bands;
10 Entertainment, namely, live performances by a musical band; Conducting of
11 entertainment events in the nature of live musical performances; Entertainment
12 services in the nature of live visual and audio performances by musical bands;
13 Entertainment, namely, live music concerts.” This pending application covers
14 substantially the same or similar services as were registered in connection with
15 Registration No. 4584097.

16 49. Hyde Lane also owns common law trademark rights in its inherently
17 distinctive DEMON HUNTER mark, which has also acquired secondary meaning
18 in the marketplace, to distinguish its goods and services from those of others in at
19 least the same categories of goods and services as described in Hyde Lane’s
20 registered trademarks and pending trademark application

21 50. Hyde Lane’s registered and common law trademarks are collectively
22 referred to herein as the “Marks.”

23 51. For over a quarter century, Hyde Lane has conducted business using
24 the Marks in interstate commerce. As such, and as described above, Hyde Lane has
25 acquired both federal trademark registrations and common law trademark rights
26 through use of the Marks as a designation of the source and origin of its products
27 and services.

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1 52. The Marks have gained significant goodwill and traction in the
2 marketplace and Hyde Lane has invested substantial resources, including decades of
3 tireless dedication and an unwavering commitment to excellence, in developing said
4 goodwill. As such, Hyde Lane has every right to have its valuable and carefully
5 cultivated intellectual property rights respected—especially by multi-billion dollar
6 corporations who are fully aware of the strictures of the law and have no
7 compunction about enforcing their own valuable intellectual property rights against
8 others.

9 ***Defendants’ Willful Infringement of the Trademarks***

10 53. Netflix owns and operates and/or controls the Netflix streaming service
11 of the same name.

12 54. Netflix also owns and operates and/or controls the Netflix Shop, an
13 online shop where Netflix offers for sale and sells “exclusive officially licensed
14 merchandise inspired by your favorite Netflix stories and characters.”

15 55. On information and belief, Netflix Studios is the production arm of
16 Netflix.

17 56. Netflix and Netflix Studios have no license or rights to the Marks and
18 were never so licensed or authorized by Hyde Lane for any use of the Marks.

19 57. In June 2025, Netflix released and distributed a movie on its streaming
20 service titled *KPop Demon Hunters*.

21 58. *KPop Demon Hunters* follows the actions of a KPop girl band who use
22 their music to protect the world from demons when a rival KPop boy band arrives
23 on the scene and impacts their efforts.

24 59. KPop is short for Korean Popular Music, a popular genre of music that
25 originated in South Korea and has grown into a global phenomenon. The term
26 “KPop” is therefore a generic word for a particular genre of music, similar to the
27 way the terms rock n’ roll, hip-hop, EDM, trap, house, or jazz are the literal names
28 of particular genres of music.

1 60. Because *KPop Demon Hunters* tells the story of two competing KPop
2 bands, much of its narrative focuses on music and the rival bands’ performances of
3 their songs.

4 61. *KPop Demon Hunters* features nine original songs.

5 62. On information and belief, around the same time that it released the
6 movie, Netflix released a soundtrack album featuring the songs from the movie.
7 The audio recordings were and are offered for sale, licensing and streaming and
8 were and are sold/licensed/distributed in interstate commerce at least in the form of
9 CDs, downloadable recordings, streaming recordings and vinyl albums.

10 63. *KPop Demon Hunters* and its soundtrack became massive hits for
11 Netflix.

12 64. According to Netflix, *KPop Demon Hunters* is “the most-watched
13 Netflix animated original film of all time” and is “Netflix’s most popular English-
14 language film ever, with more than 325.1 million views.”
15 ([https://www.netflix.com/tudum/articles/kpop-demon-hunters-release-date-cast-](https://www.netflix.com/tudum/articles/kpop-demon-hunters-release-date-cast-news)
16 [news](https://www.netflix.com/tudum/articles/kpop-demon-hunters-release-date-cast-news)).

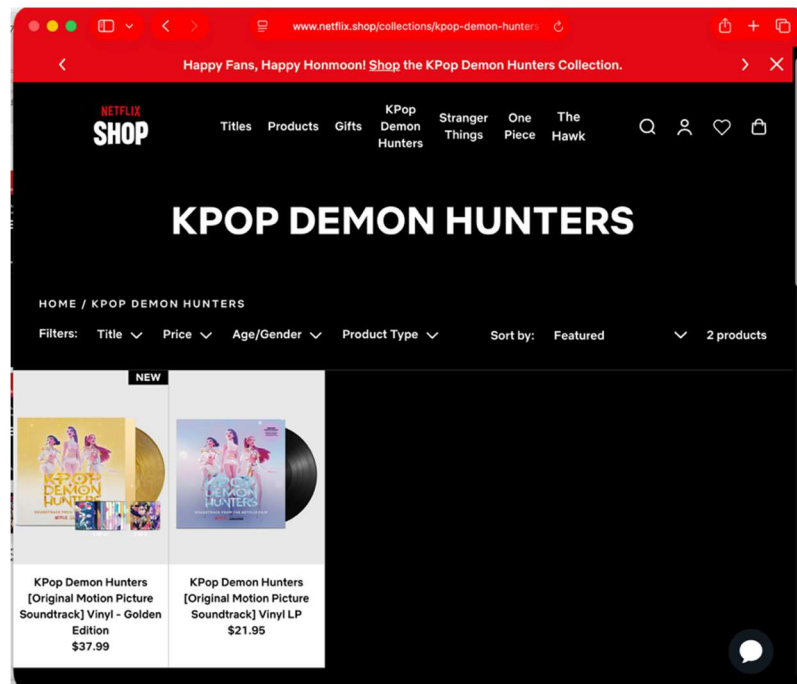
17 65. According to Netflix: “KPop Demon Hunters (*Soundtrack from the*
18 *Netflix Film*), which has scored more than 10 billion global streams to date, is the
19 first soundtrack with four simultaneous Top 10 songs on the Billboard Hot 100. It
20 won the Golden Globe for Best Song and has been nominated for five 2026
21 Grammy Awards, including Song of the Year for ‘Golden,’ Best Pop Duo/Group
22 Performance for ‘Golden,’ Best Compilation Soundtrack for Visual Media, Best
23 Song Written for Visual Media for ‘Golden,’ and Best Remixed Recording for David
24 Guetta’s remix of ‘Golden.’ The film won the 2026 Critics Choice Award for Best
25 Animated Feature and ‘Golden’ took home the award for Best Song.”
26 (<https://www.netflix.com/tudum/articles/kpop-demon-hunters-soundtrack>).

27 66. Netflix and Netflix Studios looked to further capitalize on the
28 popularity and success of *KPop Demon Hunters* by selling merchandise under the

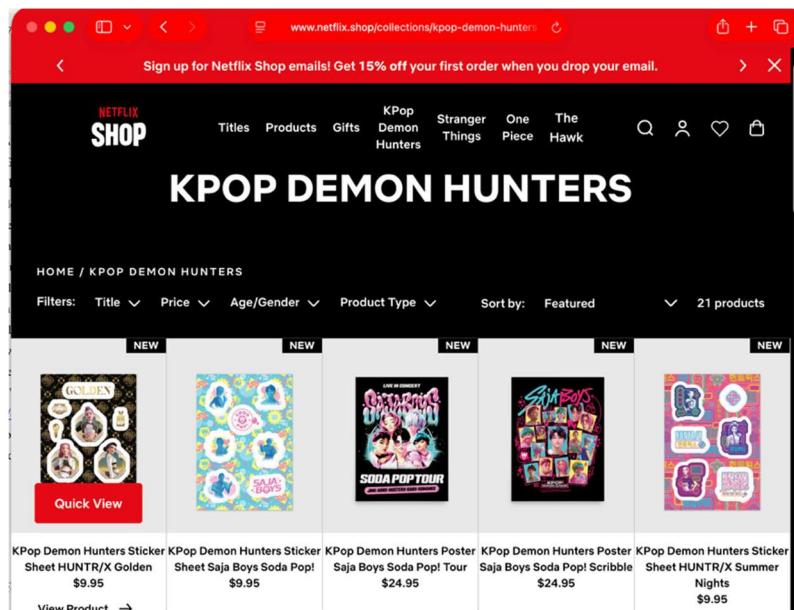
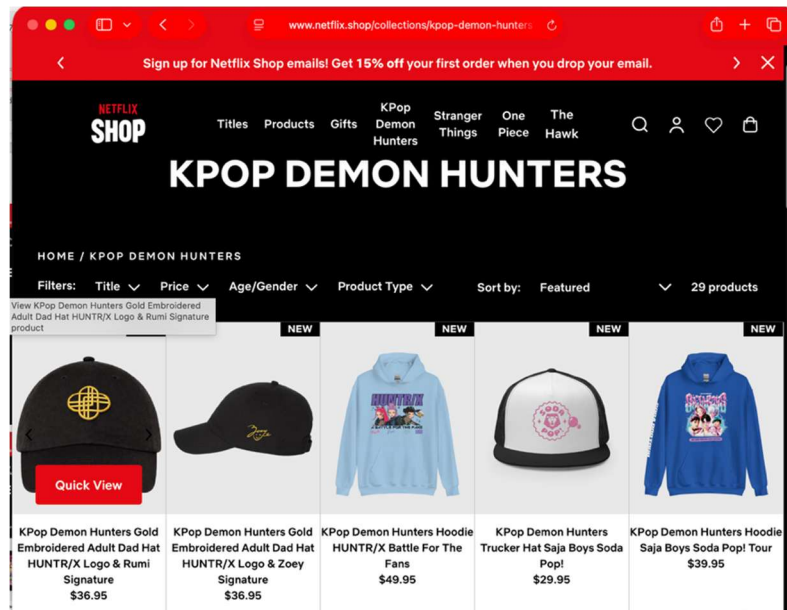
1 KPOP DEMON HUNTERS brand and, more recently, with respect to live
2 performances.

3 67. Netflix and Netflix Studios have therefore used the KPOP DEMON
4 HUNTERS brand as a trademark, as evidenced by their own attempts to obtain
5 registered trademarks therein. Indeed, since August 2025, Netflix Studio has filed
6 ten applications for registration with the U.S. Patent and Trademark Office for the
7 mark KPOP DEMON HUNTERS in connection with International Classes 003
8 (Non-medicated cosmetics and toiletry preparations), 009 (recorded and
9 downloadable media, computer software), 020 (furniture and parts therefor), 021
10 (Household or kitchen utensils and containers), 024 (fabrics and fabric covers for
11 household use), 028 (Games, toys and playthings), and 041 (providing of
12 entertainment; sporting and cultural activities). The earliest use in commerce
13 claimed by Netflix Studios in these applications is June 10, 2025.

14 68. Netflix and Netflix Studios offer, at a minimum, audio recordings/pre-
15 recorded albums featuring music, paper goods, and clothing, under the KPOP
16 DEMON HUNTERS mark on Netflix's own retail website (the "Netflix Shop"),
17 available at <https://www.netflix.shop/collections/kpop-demon-hunters>. Screenshots



of the Netflix Shop showing the use of the mark KPOP DEMON HUNTERS in connection with the sale of these goods are below:



(Screenshots captured on July 28, 2026).

69. On information and belief, Netflix Studios licenses and/or otherwise authorizes third parties to use the mark KPOP DEMON HUNTERS in connection with merchandise, including audio recordings, digital media, paper goods, and clothing.

1 70. By offering for sale and selling at least the above-described
2 merchandise, Netflix and Netflix Studios have expanded their actions to infringe
3 Hyde Lane’s Trademark Registration Nos. 6607086 (International Class 016 (paper
4 goods)) and 6607087 (International Class 025 (clothing)), along with its common
5 law marks.

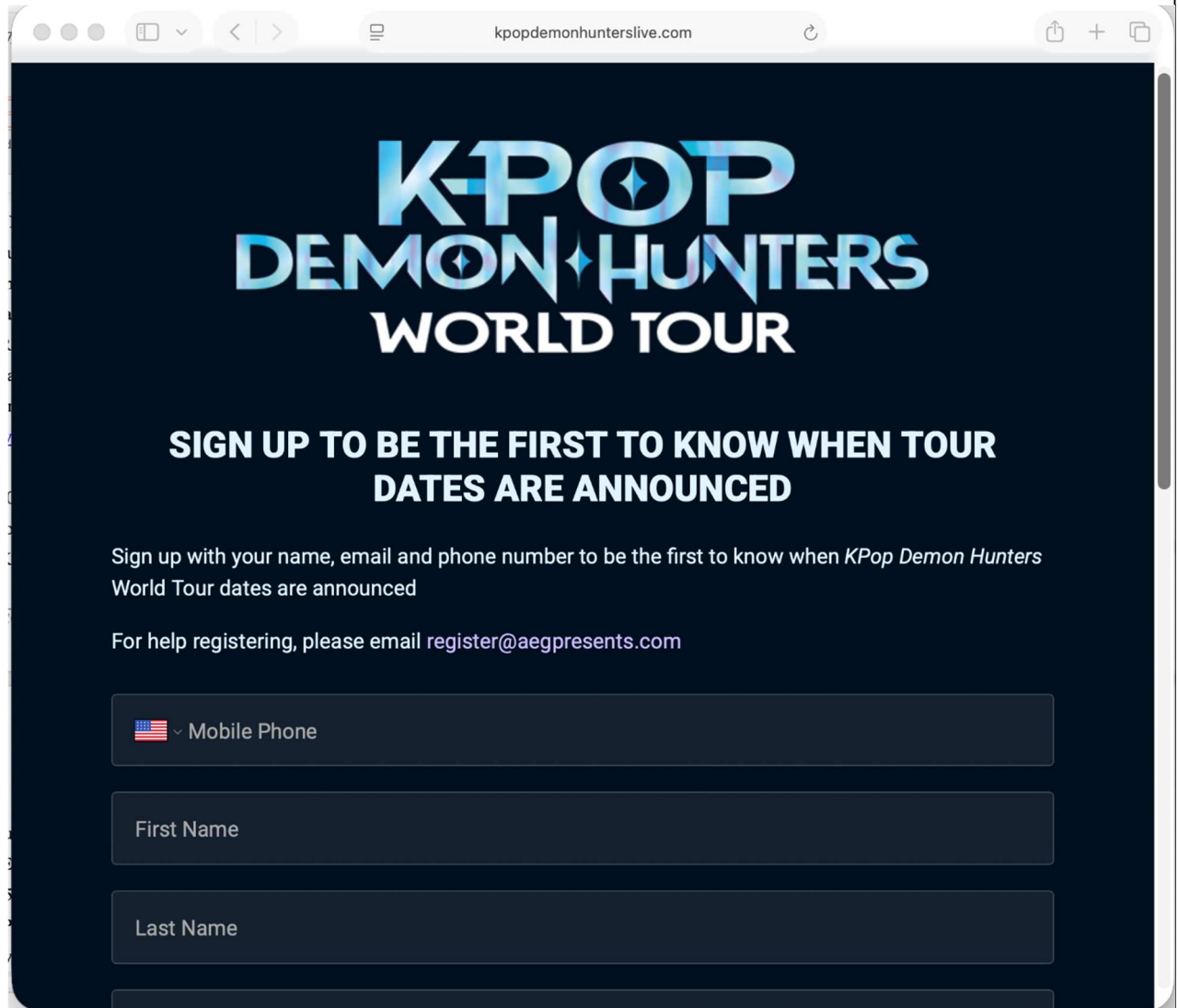
6 71. Unfortunately, on or around May 13, 2026, Netflix and Netflix
7 Studios—this time in association with AEG—announced their intention to further
8 expand their infringement of Hyde Lane’s trademarks by using KPOP DEMON
9 HUNTERS in connection with entertainment services, including live concerts.
10 Specifically, as stated on Netflix’s website, “Netflix is teaming up with AEG
11 Presents to launch a KPop Demon Hunters global concert tour, a live experience. . .
12 .” ([https://www.netflix.com/tudum/features/kpop-demon-hunters-official-world-](https://www.netflix.com/tudum/features/kpop-demon-hunters-official-world-tour)
13 [tour](https://www.netflix.com/tudum/features/kpop-demon-hunters-official-world-tour)).
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72. On or around May 13, 2026, Defendants published the website <https://kpopdemonhunterslive.com/> to market and advertise the upcoming live concerts offered under the mark KPOP DEMON HUNTER. This announcement came on the heels of a surprise live performance at Coachella Valley Music & Arts Festival, owned and operated by Goldenvoice, a subsidiary of AEG Presents, the live entertainment division of AEG Worldwide.



(Screenshot captured on July 28, 2026).

73. Netflix Studios is further attempting to usurp Hyde Lane's trademark rights in DEMON HUNTER in connection with providing live entertainment. On November 7, 2025, Netflix Studios filed an application for trademark registration with the U.S. Patent and Trademark office for KPOP DEMON HUNTERS in

1 connection with International Class 041 for at least “entertainment events in the
2 nature of organizing cultural and arts events, concerts, galas, dance events, balls,
3 and social entertainment events” and “entertainment services in the nature of live
4 theatrical, musical, and comedic performances. . . .” (Trademark Serial No.
5 99485888).

6 74. With the announcement of live concerts and the application for a
7 trademark registration for live entertainment services, Defendants use of KPOP
8 DEMON HUNTERS has moved to an almost complete overlap with Hyde Lane’s
9 Marks.

10 75. Because Hyde Lane was actively using its Marks in interstate
11 commerce since at least 2002 and continuously thereafter, its uses predate all of
12 Netflix and Netflix Studios’ uses in commerce of any confusingly similar mark, and
13 thus ***Hyde Lane is the senior user of the Marks by over twenty years.***

14 76. Accordingly, Netflix and Netflix Studios have engaged in acts that
15 infringe Hyde Lane’s trademark Reg. Nos. 6607085, 6607086, and 6607087 along
16 with its common law marks.

17 77. Defendants’ activities have resulted in a likelihood of confusion as
18 well as actual confusion in the marketplace in at least two ways. First, Plaintiff’s
19 brand has suffered from so-called forward confusion, at the initial interest, point of
20 sale, and post-sale stages, as Defendants’ use of the KPOP DEMON HUNTERS
21 mark has a tendency to cause confusion, deception, and mistake by creating the
22 false and misleading impression that Defendants’ goods and services are
23 manufactured, produced, distributed, endorsed, sponsored, approved, affiliated, or
24 connected with Hyde Lane.

25 78. Second, and perhaps even more fatally, Hyde Lane’s brand has also
26 suffered from reverse confusion, at the initial interest, point of sale, and post-sale
27 stages, as Defendants’ use has a tendency to cause confusion, deception, and
28 mistake by creating the false and misleading impression that Hyde Lane’s goods

1 and services are manufactured, produced, distributed, endorsed, sponsored,
2 approved, affiliated, or connected with Defendants.

3 79. The harm to Defendants' conduct is particularly pernicious where, as
4 here, Defendants are massive corporations with millions of dollars to pour into their
5 own brand development (and their own accompanying associations) from Marks
6 that they simply seized from Plaintiff, and thus, consumers are likely to mistakenly
7 believe that Defendants are actually the senior user and that Hyde Lane is
8 potentially an infringer, or that Hyde Lane is affiliated with or sponsored by
9 Defendants.

10 80. Defendants' wholesale usurpation of Plaintiff's Marks has devastated
11 the ability that Plaintiff previously enjoyed to control its brand and has
12 irredeemably destroyed the associations with the Marks that Plaintiff spent decades
13 establishing, cultivating and further investing in, thereby annihilating Plaintiff's
14 control over its brand identity, goodwill and reputation.

15 81. To make matters even worse, Defendants' misconduct is unmistakably
16 willful.

17 82. As one of the largest entertainment/media companies in the world,
18 Netflix is well versed in the strictures of trademark law. Indeed, and among other
19 things, Netflix owns around sixty-nine federally registered trademarks and pending
20 federal trademark registration applications.

21 83. As the production arm of Netflix, Netflix Studios is similarly well-
22 versed in the strictures of trademark law as Netflix. On information and belief,
23 Netflix Studios owns around two hundred and sixty-seven federally registered
24 trademarks and pending federal trademark registration applications.

25 84. Yet further, Netflix and Netflix Studios actively enforce their own
26 purported trademark rights—further confirming their knowledge of the strictures of
27 trademark law and the need to obtain licenses prior to using a trademark that Netflix
28 or Netflix Studios do not own. Indeed, Netflix and Netflix Studios recently filed suit

1 in the United States District Court for the Northern District of Illinois, Eastern
2 Division, *Netflix, Inc et al. v. The Partnerships and Unincorporated Associations*
3 *Identified on Schedule "A,"* Case No. 26-cv-04705 (filed April 28, 2026), claiming
4 infringement of its trademarks, including its purported KPOP DEMON HUNTERS
5 marks.

6 85. Furthermore, on information and belief, Netflix and Netflix Studios
7 were aware of Hyde Lane's rights in the Marks and chose to disregard those rights
8 in favor of capitalizing on the success of the KPop Demon Hunters movie to sell
9 merchandise and increase Netflix and Netflix Studio's profits, and they were aware
10 of Hyde Lane's rights in the Marks and actively chose to disregard those rights in
11 favor of capitalizing on the success of the KPop Demon Hunters movie by
12 announcing live concerts which are intended to generate further revenue and profits
13 for Defendants. After all, among other things, (1) Hyde Lane's Marks have been
14 registered with the United States Patent and Trademark Office for many years,
15 putting Netflix both on constructive notice of Hyde Lane's rights and Marks; (2)
16 Netflix and Netflix Studios and their respective counsel undoubtedly came across
17 (or should have come across) the registered DEMON HUNTER Marks when
18 performing even the most cursory search of the USPTO Trademark Database when
19 preparing to file their own portfolio of trademark applications in connection with
20 KPOP DEMON HUNTERS; and (3) on information and belief, Netflix and/or
21 Netflix Studios have engaged in a strategy of filing trademark registration
22 applications that are carefully worded to attempt to skirt detection by the USPTO
23 with respect to Hyde Lane's registered marks.

24 86. For example, Netflix Studios' registration KPOP DEMON HUNTERS
25 in International Class 009 is for "Decorative magnets; Protective sleeves for laptop
26 computers; Mouse pads; Protective cases for mobile phones." In comparison, Hyde
27 Lane's registration in International Class 009 is for "Audio recordings featuring
28 music; Digital media, namely, pre-recorded DVDs, downloadable audio and video

1 recordings, and CDs featuring and promoting music; Downloadable audio
2 recordings featuring music; Downloadable musical sound recordings; Musical
3 recordings; Pre-recorded CDs featuring music; Pre-recorded record albums
4 featuring music.” Yet, KPOP DEMON HUNTERS is most well-known by the
5 public as being “digital media” (a movie on the Netflix streaming platform) and
6 “audio recordings featuring music” (the soundtrack and songs from the soundtrack).
7 But, quite curiously, and despite continuing to engage in interstate commerce
8 making trademark use of KPOP DEMON HUNTERS in digital media and audio
9 recordings featuring music, Netflix Studios did not identify those particular goods
10 in their registration; instead, it filed a registration that excluded any mention of
11 some of the goods for which the KPOP DEMON HUNTER brand is best known.

12 87. Similarly, despite Netflix and Netflix Studios continuing to engage in
13 interstate commerce making trademark use of KPOP DEMON HUNTER in
14 connection with the sale of numerous paper goods such as stickers, decals, posters,
15 and hundreds of different varieties of clothing such as t-shirts and sweatshirts, and
16 thereby actively infringing Plaintiff’s Marks, Netflix Studios unusually did not
17 identify those specific goods in its trademark applications. This careful crafting of
18 their filed registrations appears uniquely designed to evade USPTO detection of
19 their likelihood of confusion with Plaintiff’s Marks.

20 88. These machinations further evidence awareness of Hyde Lane’s
21 registrations and willfulness as, by not naming the exact goods identified in
22 Plaintiff’s long-extant registrations, Netflix and Netflix Studios sought to avoid
23 scrutiny by the USPTO, which would have identified Plaintiff’s registrations and,
24 consequently, denied their applications on the grounds that they would create a
25 likelihood of confusion therewith.

26 89. For a multi-billion company with an army of in-house lawyers and
27 outside counsel deeply steeped in the niceties of intellectual property law and
28 licensing requirements to adopt such a tack plainly evinces willful disregard for the

1 rights of others, oppression and malice.

2 90. The activities complained of herein have and continue to irreparably
3 harm Hyde Lane and devastate its ability to control the goodwill and associations
4 with its Marks. Further, Defendants' egregious conduct makes this an exceptional
5 case.

6 ***KPOP DEMON HUNTERS Is Confusingly Similar to DEMON HUNTER***

7 91. KPOP DEMON HUNTERS is confusingly similar to DEMON
8 HUNTER.

9 92. KPOP DEMON HUNTERS subsumes the entire DEMON HUNTER
10 mark.

11 93. The inclusion of KPOP before the words DEMON HUNTERS does
12 not overcome the likelihood of confusion because KPOP is a generic or, at best,
13 merely descriptive term—a conclusion the U.S. Patent and Trademark Office
14 already made. Indeed, on March 16, 2026, the trademark examiner refused Netflix
15 Studios' application for trademark registration for KPOP DEMON HUNTERS in
16 International Class 041 because the term KPOP "is merely descriptive of an
17 ingredient, quality, characteristic, function, feature, purpose, or use of applicant's
18 goods and/or services." In response, on June 3, 2026, Netflix Studios attempted to
19 argue that "Consumers understand 'KPOP'" as being a part of the whole and
20 indivisible unitary mark, KPOP DEMON HUNTERS, which identifies the title of a
21 famous animated film, and the mark functions as an incongruous and unique
22 indication of source." However, on July 20, 2026, the trademark examiner again
23 refused Netflix Studios' application, explaining that "'KPOP' and 'DEMON
24 HUNTERS' merely aggregate descriptions of the characters but do not actually
25 modify each other in meaning" and that "the meaning of 'KPOP' retains its general
26 dictionary-based and acronym-based meaning and merely acts as a descriptor of
27 'DEMON HUNTERS.'" But, the trademark examiner provided a way forward for
28 Netflix Studios: "Applicant may respond to this issue by submitting a disclaimer in

1 the following format: No claim is made to the exclusive right to use ‘KPOP’ apart
2 from the mark as shown.” In short, the U.S. Patent and Trademark Office has
3 already confirmed that the term KPOP merely describes a feature or characteristic
4 of DEMON HUNTERS and thus, the potentially registerable and thus, protectable
5 portion of KPOP DEMON HUNTERS is DEMON HUNTERS.

6 94. Simply put, Netflix is no more entitled to use the mark KPOP DEMON
7 HUNTERS than it would be to launch a recording artist, live touring show and
8 merchandise under the marks KPOP METALLICA, KPOP U2 or KPOP BLACK
9 SABBATH.

10 95. Not only are the terms KPOP DEMON HUNTERS and DEMON
11 HUNTER plainly confusingly similar, the services have nearly complete overlap.
12 DEMON HUNTER has a long history of use of its Marks in interstate commerce in
13 connection with goods and services that fall within International Class 009 (Reg.
14 No. 6607085), International Class 016 (Reg. No. 6607086), International Class 025
15 (Reg. No. 6607087), and International Class 041 (Ser. No. 99528509). As set forth
16 above, Defendants are using KPOP DEMON HUNTERS in connection with
17 literally the same goods and services.

18 96. Because of the overlap in the goods and services, and the strong
19 similarity between KPOP DEMON HUNTERS and DEMON HUNTER, consumers
20 are likely to be confused regarding the origin, sponsorship, or affiliation of the
21 goods and services.

22 ***Defendants Activities Have Already Caused Actual Confusion***

23 97. Moreover, although no evidence of actual confusion is necessary for a
24 finding of trademark infringement or false designation of origin, unfortunately,
25 Defendants’ actions have already resulted in numerous instances of actual consumer
26 confusion.

27 98. For example, on February 26, 2026, Hyde Lane received an email
28 requesting a ticket refund based on that person purchasing tickets to a Demon

1 Hunter concert after being confused and thinking that they were purchasing tickets
2 to a KPop Demon Hunter concert:

3 “Hi Demon Hunter, I just purchased tickets to your show in Albany
4 NY for May 2, 2026 and after I accepted the tickets I realized that
5 you guys are not "K Pop demon hunters" and that my 5 and 6yr old
6 girls will probably not fit in well at your concert. I thought I was
7 purchasing tickets to a child friendly concert [sic]. I was way to [sic]
8 excited and didn't pay attention. I spent almost \$500 on the tickets
9 because I wanted my girls to have a great view their very first concert
10 and I really messed up. Is their [sic] anyway to refund me or get me
11 a credit or something. If I dont get it refunded I will not be able to
12 purchase tickets to the actual "K pop demon hunters show". Please
13 help! Thanks for your time.

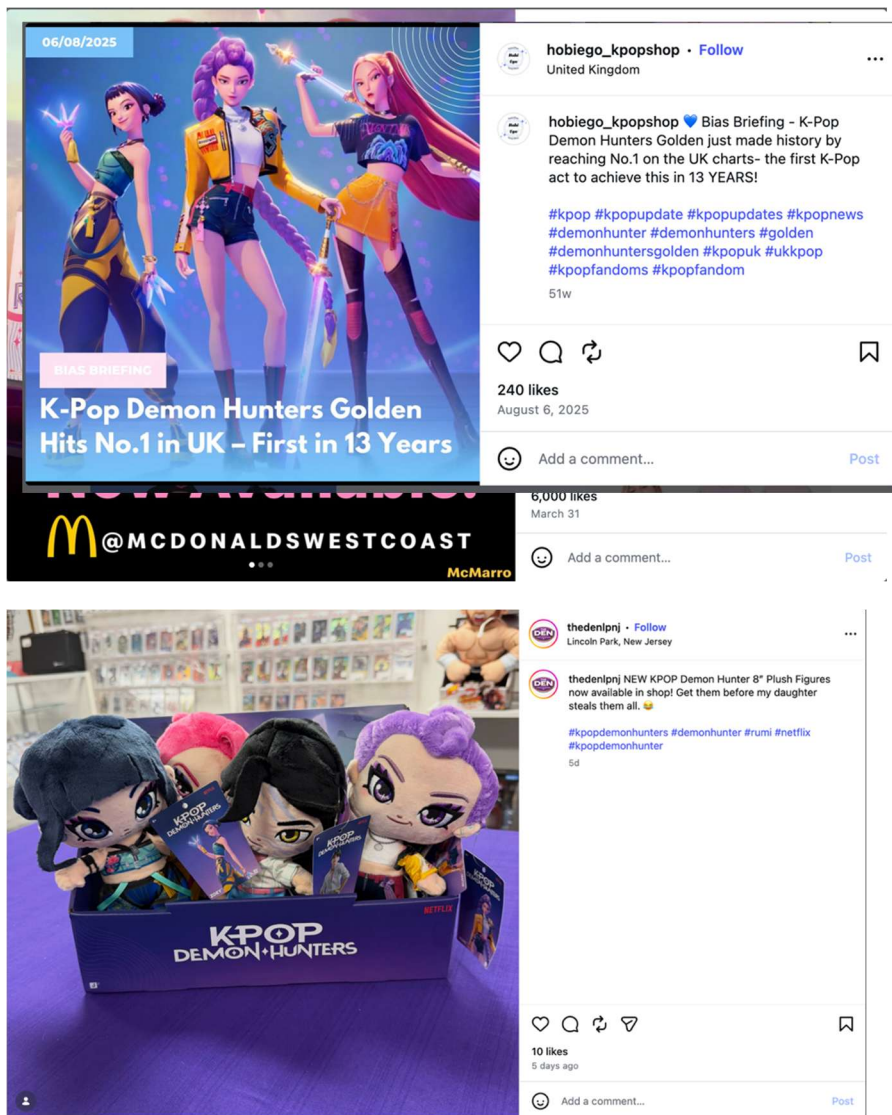
14 99. On or around March 16, 2026, a producer from the television show
15 Inside Edition emailed Ryan J. Downey,¹ the manager of Demon Hunter, to request
16 an interview with “songwriter Yu-Han Lee” to “speak with him about winning the
17 prestigious [Oscar] award.” Yu-Han Lee is not associated with Demon Hunter or
18 Hyde Lane, but he is the songwriter for KPop Demon Hunters that won an Oscar on
19 March 15, 2026, in connection with KPop Demon Hunter.

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24 ¹ Mr. Downey has spent nearly three decades building a career at the intersection of
25 storytelling and pop culture as a writer, producer, talent manager, author, creative
26 consultant, and moderator across music, film, television, publishing, and live events.
27 He has over interviewed over 100 other artists and cultural figures, contributed to,
28 produced, written and/or hosted content for numerous publications media outlets,
and studios, including Billboard, the GRAMMYs, Sony, Warner Bros., Z2, and
MTV News. He hosts the MI Conversation Series at Musicians Institute in
Hollywood and is a regular moderator at San Diego Comic-Con and other pop
culture events. Mr. Downey also founded Superhero Artist Management, home to
numerous well-known clients, including Demon Hunter.

100. Numerous posts on social media such as Instagram incorrectly tag DEMON HUNTER (#demonhunter) in connection with KPOP DEMON HUNTERS content:

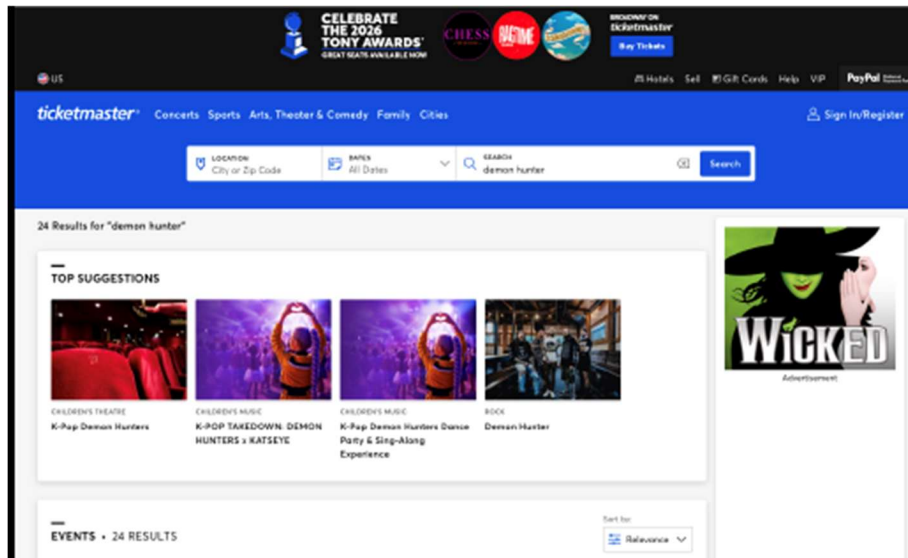


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101. In addition to consumer confusion, as KPOP DEMON HUNTERS grew in popularity, it has overwhelmed DEMON HUNTER in search results. For example, a recent search for event tickets on Ticketmaster for “Demon Hunter” prioritized three KPOP DEMON HUNTERS related events over DEMON HUNTER:

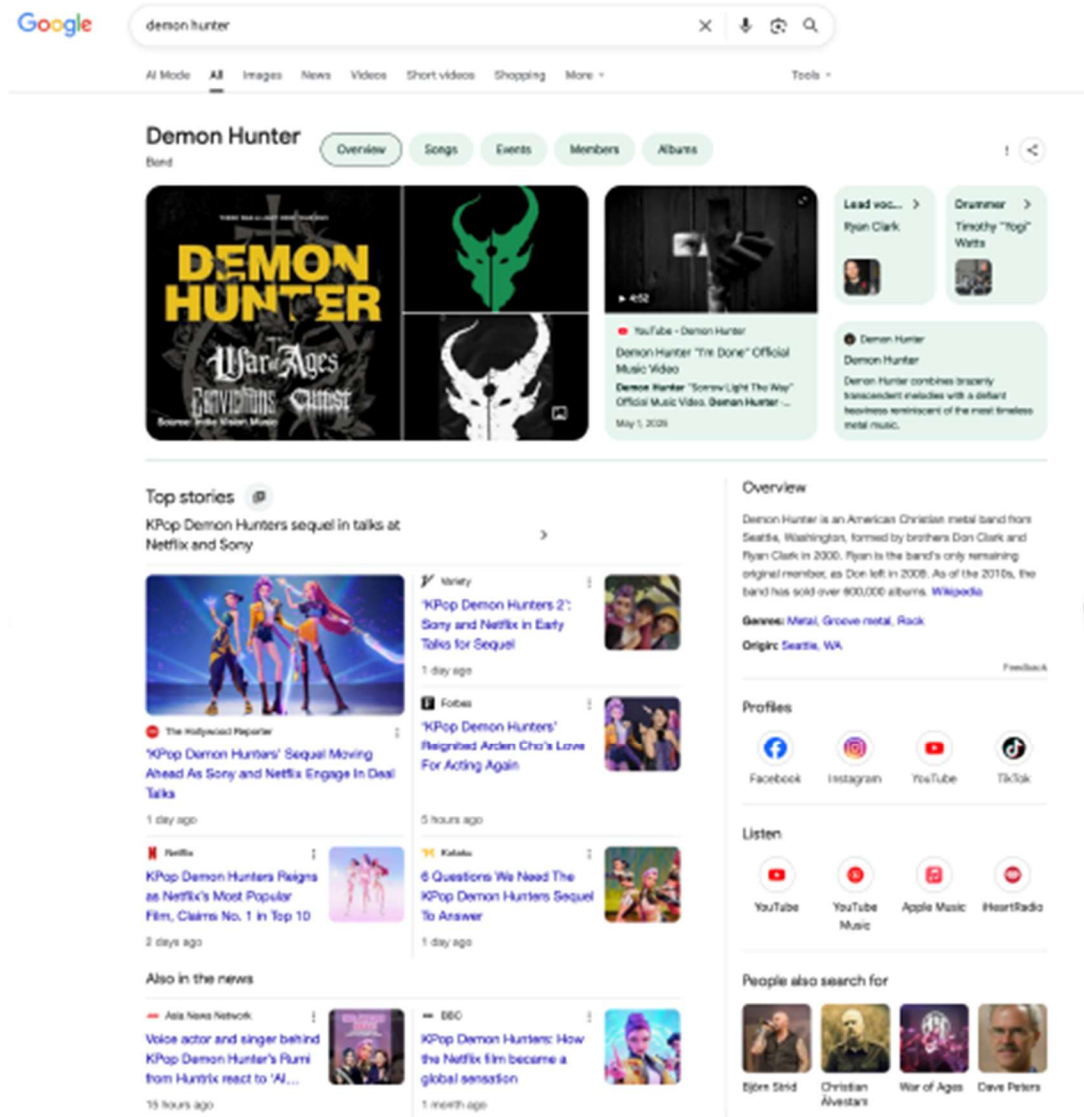


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102. In another example, a Google search for “demon hunter” in 2024 provided 50 million results and the front page of results was dominated by DEMON HUNTER. However, in 2026, a search for “demon hunter” provides 357 million results and the front page is a mix of DEMON HUNTER and KPOP DEMON HUNTER:



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1 103. In yet another example that showcases the likelihood that consumers
2 will be confused as to the source or affiliation between the Marks and KPOP
3 DEMON HUNTERS is the proliferation online of heavy metal cover versions of the
4 songs from the KPOP DEMON HUNTERS movie and soundtrack album. Since
5 Demon Hunter is a band playing in the heavy metal genre, metal cover versions of
6 the KPOP DEMON HUNTERS songs are especially likely to cause consumers to
7 believe that Hyde Lane and Defendants are affiliated. Below are screenshots of two
8 different public playlists on Spotify, each of which are made up of metal covers:
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Public Playlist

KPop Demon Hunters METAL COVERS

We sealing the Honmoon with this one // Art by Jiunn Kuo on ArtStation (DO NOT USE/TRAIN THE COVER ART ON AI, its disrespectful a...

ST☆R • 13,626 saves • 34 songs, 1 hr 47 min

▶ 🔍 Custom order ☰

#	Title	Album	Date added	🕒
1	 Your Idol Andrew Baena, Johnny Ciardullo	Your Idol	Jul 20, 2025	3:12
2	 How It's Done Andrew Baena, Lauren Babic, Phasestep	How It's Done	Jul 27, 2025	2:54
3	 Takedown Andrew Baena, Jessie Grace, Phasestep	Takedown	Aug 22, 2025	3:00
4	 Your Idol SINS	Your Idol	Jul 28, 2025	3:40
5	 What It Sounds Like SINS	What It Sounds Like	Jul 28, 2025	4:27
6	 Golden SINS	Golden	Jul 28, 2025	3:16

Public Playlist

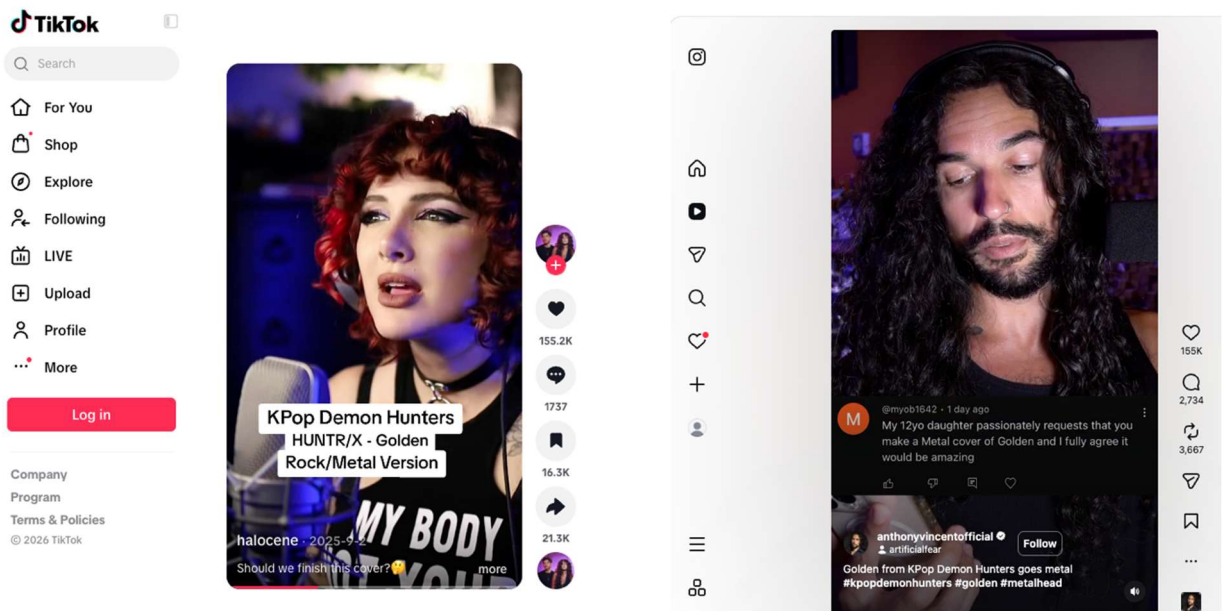
KPop Demon Hunters METAL/ROCK COVERS

mailliW • 2,003 saves • 65 songs, 3 hr 37 min

▶ 🔍 Recently added ☰

#	Title	Album	Date added ▼	🕒
1	 What It Sounds Like (Metal Version) Jonathan Young	KPop Demon Hunters Meets Metal	Apr 30, 2026	3:59
2	 How It's Done - Rock Version Kenshi, Kim X, Gogy	RDH Collection	Jan 1, 2026	3:08
3	 Soda Pop - Almost METAL Ver. Almost Metal	Soda Pop (Almost METAL Ver.)	Jan 1, 2026	3:19
4	 Your Idol - Almost METAL Ver. Almost Metal	Your Idol (Almost METAL Ver.)	Jan 1, 2026	4:02
5	 GOLDEN KAYLA KING, Mia Asano	GOLDEN	Nov 14, 2025	3:11
6	 Your Idol - Japanese Version Shayne Orok, Curserino	Your Idol (Japanese Version)	Nov 5, 2025	3:07

(Screenshots captured Aug. 8, 2026). Additionally, metal covers of the KPOP DEMON HUNTERS songs are popular on youtube.com² with numerous videos generating millions of views, as well as other social media such as TikTok and Instagram:



(Screenshots captured Aug. 8, 2026).

104. One of the consequences of the increase of KPOP DEMON HUNTERS related information and content online is that it has become increasingly difficult for consumers looking for DEMON HUNTER to find relevant information and purchase DEMON HUNTER goods and services.

² “YOUR IDOL (K-Pop Demon Hunters) || Saja Boys Metal Cover by @jonathanymusic” (https://www.youtube.com/watch?v=dRyW5QFknKI&list=RDdRyW5QFknKI&start_radio=1) (2.3 million views); “‘How It’s Done’ Metal Version | K-Pop Demon Hunters (available at https://www.youtube.com/watch?v=EjL-qHZhaNo&list=RDEjL-qHZhaNo&start_radio=1) (1.4 million views); GOLDEN - K-POP Demon Hunters Goes METAL (ft. @marinalatorracaofficial & @wearetulip) HUNTRIX COVER”) (https://www.youtube.com/watch?v=7oj90Eare4c&list=RD7oj90Eare4c&start_radio=1) (722,000 views).

105. Ultimately, as the senior user of DEMON HUNTER with over twenty-five years of history, hard work, effort, and investment into the DEMON HUNTER brand, Hyde Lane should be able to continue operating under the name it established without substantial confusion among consumers seeking the band's music, live performances, merchandise, and related activities. But, due to Defendants' wrongful actions, Demon Hunter's established identity is becoming increasingly obscured within recorded music, live touring and merchandise-related channels due to overlapping use by the KPOP DEMON HUNTERS brand.

106. As a result of Defendants' willful misconduct, the DEMON HUNTER Marks and the brand that Hyde Lane has carefully built over the course of the past quarter century now faces an existential crisis, thereby necessitating the filing of this action and the granting of the requested relief from this Court.

FIRST CAUSE OF ACTION

(Trademark Infringement, 15 U.S.C. § 1114)

(By Plaintiff against Netflix and Netflix Studios)

107. Plaintiff hereby incorporates by reference and realleges the allegations in all previous paragraphs as though fully set forth herein.

108. Hyde Lane owns valid and protectable rights in the federally registered DEMON HUNTER Marks, which Hyde Lane has continuously used since the date of first use as designated in their respective trademark registrations.

109. The use by Netflix and Netflix Studios of confusingly similar imitations of the federally registered Marks constitutes infringement of Plaintiff's federally registered Marks in violation of Section 32 of the Lanham Act, 15 U.S.C. § 1114, as the actions of Netflix and Netflix Studios are likely to cause forward and/or reverse confusion, or to cause mistake, or to deceive consumers as to an affiliation, connection, or association between Hyde Lane and Defendants Netflix and Netflix Studios, or as to the origin, sponsorship, or approval of the goods or services of Netflix and/or Netflix Studios by Hyde Lane. The use by Netflix and

1 Netflix Studios has a tendency to deceive or confuse consumers into believing that
2 products and/or services of Netflix and Netflix Studios are affiliated with Hyde
3 Lane, are sponsored or approved of by Hyde Lane, or otherwise associated with or
4 authorized by Hyde Lane, and/or that Hyde Lane's products and/or services are
5 associated with Netflix and/or Netflix Studios, are sponsored or approved of by
6 Netflix and/or Netflix Studios, or otherwise associated with or authorized by Netflix
7 and/or Netflix Studios.

8 110. Netflix and Netflix Studios have further knowingly encouraged,
9 induced, materially contributed to, and/or facilitated the infringement of Plaintiff's
10 federally registered DEMON HUNTER Marks and they have the right and ability to
11 stop or limit the infringement and a direct financial interest in such infringing
12 activities.

13 111. As a consequence of the acts described above, Netflix and Netflix
14 Studios have directly, contributorily or vicariously infringed and are directly,
15 contributorily or vicariously infringing Hyde Lane's trademark rights in the federal
16 registered DEMON HUNTER Marks.

17 112. At no time did Defendants have authorization, legal rights, or consent
18 to engage in such activities in disregard of Plaintiff's rights in the federally
19 registered DEMON HUNTER Marks.

20 113. Hyde Lane is informed and believes and thereon alleges that as a
21 proximate result of the unfair advantage accruing to Defendant Netflix and Netflix
22 Studios' business from deceptively trading on Hyde Lane's federally registered
23 Marks in advertising, sales, and consumer recognition, Hyde Lane has been
24 damaged and deprived of substantial sales and has been deprived of the value of its
25 federally registered Marks as a commercial asset, in amounts to be established
26 according to proof.

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114. Netflix and Netflix Studios' unauthorized use and promotion of the federally registered DEMON HUNTER Marks are causing confusion, and will likely continue to cause confusion, mistake, or deception on the part of consumers as to the source, nature, and quality of the good and services Netflix and Netflix Studios are offering, constituting trademark infringement in violation of 15 U.S.C. § 1114.

115. By reason of the existence of an actual and justiciable controversy, Hyde Lane is entitled to a finding of infringement that Netflix's activities infringe Hyde Lane's federally registered Marks in violation Section 32 of the Lanham Act, 15 U.S.C. § 1114.

116. Hyde Lane is informed and believes, and thereon alleges that, unless restrained by the Court, Netflix and Netflix Studios will continue to infringe the federally registered Marks, thus engendering a multiplicity of judicial proceedings, and that pecuniary compensation will not afford Hyde Lane adequate relief for the damage to its federally registered Marks in the public perception. Further, Hyde Lane is informed and believes and thereon alleges that in the absence of injunctive relief, customers are likely to continue to be mistaken or deceived as to the true source, origin sponsorship, and affiliation of Hyde Lane with Netflix and Netflix Studios.

117. As a direct and proximate result of Netflix and Netflix Studios' wrongful conduct, Hyde Lane has been, is now, and will be irreparably injured and damaged by Netflix and Netflix Studios' aforementioned acts, and unless Netflix and Netflix Studios are enjoined by the Court, Hyde Lane will suffer further harm to its name, reputation, and goodwill. This harm constitutes an injury for which Hyde Lane has no adequate remedy at law.

118. At a minimum, Hyde Lane is entitled to injunctive relief and to recover Netflix and Netflix Studios' profits, whichever is greater, together with Hyde Lane's attorneys' fees pursuant to 15 U.S.C. § 1117. In addition, pursuant to 15

1 U.S.C. § 1118, Hyde Lane is entitled to an order requiring destruction of all
2 infringing materials in Netflix or Netflix Studios' possession.

3 119. On information and belief, Netflix and Netflix Studios had actual
4 knowledge of Hyde Lane's ownership and use of the federally registered DEMON
5 HUNTER Marks prior to Netflix and Netflix Studios' adoption and use of
6 confusingly similar variations of the federal registered Marks in connection with the
7 promotion and sale of its products and services.

8 120. On information and belief, Netflix and Netflix Studios have acted
9 deliberately, intentionally, and willfully to usurp Hyde Lane's rights, and should be
10 held liable for treble damages and attorneys' fees pursuant to 15 U.S.C. § 1117(a),
11 and Netflix and Netflix Studios' profits due to the infringement.

12 **SECOND CAUSE OF ACTION**

13 **(False Designation of Origin, 15 U.S.C. § 1125(a)(1)(A))**

14 **(By Plaintiff against Defendants)**

15 121. Plaintiff hereby incorporates by reference and realleged the allegations
16 in all previous paragraphs as though fully set forth herein.

17 122. In addition to its federal trademark registrations, Hyde Lane owns and
18 enjoys valid, enforceable and fully subsisting common law trademark rights in the
19 DEMON HUNTER Marks in California and throughout the United States.

20 123. Specifically, Defendants' use confusingly similar imitations of the
21 DEMON HUNTER Marks in interstate commerce constitutes false designations of
22 origin, as it is likely to cause forward and/or reverse confusion, or to cause mistake,
23 or to deceive consumers as to an affiliation, connection, or association between
24 Hyde Lane and Defendants, or as to the origin, sponsorship, or approval of
25 Defendants' goods or services by Hyde Lane. Defendant's use has a tendency to
26 deceive or confuse consumers into believing that Defendants' products and/or
27 services are affiliated with Hyde Lane, are sponsored or approved of by Hyde Lane,
28 or otherwise associated with or authorized by Hyde Lane, and/or that Hyde Lane's

1 products and/or services are associated with Defendants, are sponsored or approved
2 of by Defendants, or otherwise associated with or authorized by Defendants.

3 124. Defendants have further knowingly encouraged, induced, materially
4 contributed to, and/or facilitated the infringement of Plaintiff's Marks and they have
5 the right and ability to stop or limit the infringement and a direct financial interest
6 in such infringing activities.

7 125. As such, the acts of Defendants described above have directly,
8 contributorily or vicariously infringed and are directly, contributorily or vicariously
9 infringing Plaintiff's Marks and rights therein.

10 126. At no time did Defendants have authorization, legal rights, or consent
11 to engage in such activities in disregard of Hyde Lane's rights in the Marks.

12 127. By engaging in the activities described above, Defendants have made
13 and are making false, deceptive and misleading statements constituting unfair
14 competition, false representations, false designation of origin and false advertising
15 made in connection with services distributed in interstate commerce in violation,
16 directly, contributorily or vicariously, of Section 43(a) of the Lanham Act, 15
17 U.S.C. § 1125(a).

18 128. As a proximate result of Defendants' advertising, promotion, sale,
19 offering for sale, and distribution of these goods and services, Hyde Lane has been
20 damaged and deprived of sales and will continue to be deprived of sales of genuine
21 Hyde Lane goods and services.

22 129. As a proximate result of Defendants' actions, Hyde Lane has been
23 deprived and will continue to be deprived of the value of its Marks as a commercial
24 asset.

25 130. Indeed, the advertising, promotion, sale, offering for sale, and
26 distribution by Defendants of these infringing goods and services is likely to cause
27 forward and/or reverse confusion and mistake and to deceive purchasers and does in
28 fact cause forward and/or reverse confusion, mistake, and deception.

1 131. In addition, as a proximate result of the unfair advantage accruing to
2 Defendants' businesses from deceptively trading on Hyde Lane's Marks and its
3 goodwill and consumer recognition, Defendants have made substantial sales and
4 profits in amounts to be established according to proof.

5 132. Defendants' acts have caused and, unless restrained by this Court, will
6 continue to cause Hyde Lane and the public to suffer great and irreparable damage,
7 for which no adequate remedy at law exists, and injury through, *inter alia*: (a) a
8 likelihood of forward and/or reverse confusion, mistake, and deception among the
9 relevant purchasing public as to the true source, origin, sponsorship, and affiliation
10 of the Defendants' infringing goods and/or services and Hyde Lane's goods and/or
11 services associated with the Marks; and (b) the loss of Hyde Lane's valuable
12 goodwill and business reputation symbolized by its Marks.

13 133. Defendants' acts are causing great and irreparable injury to Hyde Lane
14 and its Marks and to the products and goodwill represented thereby, in an amount
15 that cannot be ascertained at this time and, unless restrained, will cause further
16 irreparable injury, leaving Hyde Lane with no adequate remedy at law.

17 134. By reason of the foregoing, Hyde Lane is entitled to injunctive relief
18 against Defendants, restraining further acts of unfair competition, false designation
19 of origin and false advertising, and to recover attorneys' fees and any damages
20 proven to have been caused by reason of Defendants' aforesaid acts of false
21 designation of origin.

22 135. On information and belief, Defendants' actions complained of herein
23 were deliberate, intentional and willful, and Defendants knew or should have
24 known that its acts were and are wrongful and that they distributed and sold
25 infringing goods and services marketed in connection with KPOP DEMON
26 HUNTERS that infringe on Hyde Lane's Marks. In the process, Defendants acted
27 in reckless disregard of Plaintiff's intellectual property rights.

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136. On information and belief, Hyde Lane alleges that Defendants' acts were committed, and continue to be committed, with actual notice of Hyde Lane's exclusive rights and with an intent to cause confusion, to cause mistake, and/or to deceive, and to cause injury to the reputation and goodwill associated with Hyde Lane and its goods and services. Pursuant to 15 U.S.C. § 1117, Hyde Lane is, therefore, entitled to recover three times its actual damages or three times Defendants' profits, whichever is greater, together with Hyde Lane's attorneys' fees, and Hyde Lane may elect, at time of trial and in the alternative, statutory damages up to the maximum extent permitted under the Lanham Act.

137. In addition, pursuant to 15 U.S.C. § 1118, Hyde Lane is entitled to an order requiring destruction of all infringing materials in Defendants' possession.

THIRD CAUSE OF ACTION

(California Statutory Unfair Competition, Cal. Bus. & Prof. Code § 17200)

(By Plaintiff against Defendants)

138. Plaintiff hereby incorporates by reference and realleges the allegations in all previous paragraphs as though fully set forth herein.

139. Defendants' conduct constitutes unlawful, unfair and fraudulent business practices and unfair competition in violation of California common law due to the unlawful acts outlined above, which includes but is not limited to the Lanham Act violations as outlined above.

140. Because Defendants violated Plaintiff's interest in the Marks, Defendants engaged in unlawful business practices in direct, contributory and/or vicarious violation of § 17200 of California's Business & Professions Code.

141. By using the Marks without consent or permission, Defendants gained an unfair business advantage by conferring upon themselves the benefits of the goodwill Plaintiff fostered over years of brand development.

142. These actions also fundamentally undermine the value of Plaintiff's trademarks as a business asset.

1 143. Plaintiff is therefore entitled to appropriate damages according to
2 proof, including but not limited to restitution, and appropriate injunctive relief to
3 protect against any ongoing and further injury caused by Defendant's unlawful and
4 unfair business practices.

5 **FOURTH CAUSE OF ACTION**
6 **(Common Law Unfair Competition)**
7 **(By Plaintiff against Defendants)**

8 144. Plaintiff hereby incorporates by reference and realleged the allegations
9 in all previous paragraphs as though fully set forth herein.

10 145. Hyde Lane owns and enjoys valid, enforceable and fully subsisting
11 common law trademark rights in the DEMON HUNTER Marks in California and
12 throughout the United States.

13 146. By using the Marks without consent or permission, Defendants gained
14 an unfair business advantage by conferring upon themselves the benefits of the
15 goodwill Hyde Lane fostered over years of brand development.

16 147. Defendants' unlawful actions also fundamentally undermine the value
17 of Hyde Lane's Marks as a business asset.

18 148. Defendants, through the conduct and violations described above, have
19 engaged in, engage in and continue to engage in unfair competition under California
20 common law. As a consequence of Defendants' violations, Hyde Lane is entitled to
21 relief as set forth below.

22 149. The acts of Defendants complained of herein constitute acts of unfair
23 competition against Plaintiff under the common law of the state of California,
24 which acts have been committed knowingly and willfully and have injured
25 Plaintiffs in their trade and business.

26 150. By the acts and activities of Defendants complained of herein,
27 Defendants have been unjustly enriched.

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151. As a direct and proximate result of the acts and activities of Defendants complained of herein, Plaintiffs have been damaged in an amount not yet ascertainable.

152. Hyde Lane is therefore entitled to appropriate damages according to proof and appropriate injunctive relief to protect against any ongoing and further injury caused by Defendants' unlawful and unfair business practices.

153. Plaintiffs are informed and believe, and based thereon allege, that Defendants, in doing the things herein alleged, acted willfully, maliciously, and oppressively, with full knowledge of the adverse effect of their actions on Plaintiffs, and with willful and deliberate disregard for the consequences to Plaintiffs, and should be held liable for exemplary damages pursuant to California Civil Code Section 3294.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs request judgment against Defendants as follows:

154. Preliminarily and permanently enjoining Netflix and Netflix Studios, and all persons in active concert or participation with them, from directly or indirectly using the KPOP DEMON HUNTERS Mark, or any other mark, word, or name incorporating or confusingly similar to Hyde Lane's DEMON HUNTER Marks, in connection with the same or related goods or services as: Audio recordings featuring music; Digital media, namely, pre-recorded DVDs, downloadable audio and video recordings, and CDs featuring and promoting music; Downloadable audio recordings featuring music; Downloadable musical sound recordings; Musical recordings; Pre-recorded CDs featuring music; Pre-recorded record albums featuring music.

155. Preliminarily and permanently enjoining Netflix and Netflix Studios, and all persons in active concert or participation with them, from directly or indirectly using the KPOP DEMON HUNTERS Mark, or any other mark, word, or name incorporating or confusingly similar to Hyde Lane's DEMON HUNTER

1 Marks, in connection with the same or related goods or services as: Decals;
2 Stickers; Magnetic bumper stickers; Posters made of paper; Printed tickets; Printed
3 calendars; Printed event programs; Printed photographs; Printed posters; Printed
4 wall calendars; Unmounted printed posters.

5 156. Preliminarily and permanently enjoining Netflix and Netflix Studios,
6 and all persons in active concert or participation with them, from directly or
7 indirectly using the KPOP DEMON HUNTERS Mark, or any other mark, word, or
8 name incorporating or confusingly similar to Hyde Lane's DEMON HUNTER
9 Marks, in connection with the same or related goods or services as: Coats; Dresses;
10 Footwear; Gloves; Headwear; Loungewear; Neckwear; Nightwear; Pants; Scarves;
11 Shirts; Shoes; Shorts; Skirts; Sleepwear; Socks; Sweaters; Underclothes; Belts;
12 Bottoms as clothing; Jackets; Tops as clothing.

13 157. Preliminarily and permanently enjoining Defendants, and all persons in
14 active concert or participation with them, from directly or indirectly using the
15 KPOP DEMON HUNTERS Mark, or any other mark, word, or name incorporating
16 or confusingly similar to Hyde Lane's DEMON HUNTER Marks, in connection
17 with the same or related goods or services as: entertainment services in the nature of
18 live musical performances; Entertainment services in the nature of live vocal
19 performances by musical bands; Entertainment, namely, live performances by a
20 musical band; Conducting of entertainment events in the nature of live musical
21 performances; Entertainment services in the nature of live visual and audio
22 performances by musical bands; Entertainment, namely, live music concerts.

23 158. Issuing and entering a seizure order directing the U.S. Marshall to
24 seize and impound all items possessed, owned or under the control of Defendants,
25 their officers, agents, servants, employees, representatives and attorneys, and all
26 persons in active concert or participation with them, which infringe upon Plaintiff's
27 trademark and unfairly compete with Hyde Lane, including but not limited to any
28 and all products bearing the infringing marks.

1 159. Issuing and entering an order directing the Commissioner of
2 Trademarks to abandon with prejudice or cancel, as relevant, Defendants pending
3 applications or registrations for purported marks that infringe Plaintiff's rights;

4 160. Awarding Hyde Lane its actual damages suffered as a result of
5 Defendants' unlawful conduct, in an amount to be proven at trial.

6 161. Awarding reasonable funds for future corrective advertising to
7 remediate Defendants' unlawful conduct.

8 162. Awarding disgorgement to Plaintiff of all gains, profits, property and
9 advantages derived by Defendants from their unlawful conduct and an accounting
10 of said gains, profits, property and advantages pursuant, inter alia, to 15 U.S.C. §
11 1117.

12 163. Awarding Hyde Lane a trebling of any damages awarded, pursuant to
13 15 U.S.C. § 1117.

14 164. Awarding restitution in an amount to be proven at trial under, inter
15 alia, California's statutory unfair competition law

16 165. Awarding damages in an amount to be proven at trial for unjust
17 enrichment under California's common law unfair competition law.

18 166. Awarding exemplary and punitive damages to deter any further willful
19 misconduct for common law unfair competition and as otherwise allowed by law

20 167. Awarding Hyde Lane its costs of suit, attorney's fees, and reasonable
21 expenses in this exceptional case.

22 168. Awarding pre-and post-judgment interest at the maximum rate
23 allowable by the law.

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1 169. Granting such other relief as the Court may deem just and equitable.

2
3 Dated: August 18, 2026

ONE LLP

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5 By: /s/ John Tehranian

6 John Tehranian

7 Peter Afrasiabi

8 Jennifer A. Mauri

9 Attorneys for Plaintiff,

10 Hyde Lane, Inc.

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a trial by jury as to all claims and all issues properly triable thereby.

Dated: August 18, 2026 **ONE LLP**

By: /s/ John Tehranian
John Tehranian
Peter Afrasiabi
Jennifer A. Mauri
Attorneys for Plaintiff Hyde Lane, Inc.