

JUDGE SCHEINDLIN

11 CIV 4825

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Muhammad Ali Enterprises LLC

Plaintiff,

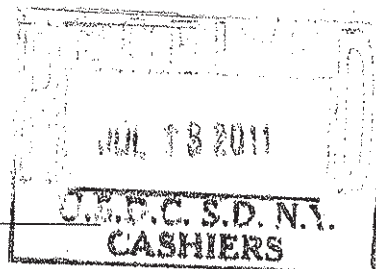
-against-

Kobo, Inc.

Defendant.

Case No.:

COMPLAINT



Plaintiff Muhammad Ali Enterprises LLC ("MAE"), by and through its attorneys, Paul, Hastings, Janofsky & Walker LLP, as and for its complaint against defendant Kobo, Inc. ("Kobo"), alleges as follows, upon actual knowledge with respect to itself and its own acts, and upon information and belief as to all other matters:

**Nature of Action and Relief Sought**

1. MAE seeks injunctive and monetary relief against Kobo's acts of federal trademark infringement, trademark dilution, unfair competition, false designation of origin and deceptive acts and practices in violation of the U.S. Trademark Act, 15 U.S.C. §§ 1051 *et seq.*; trademark infringement, trademark dilution, unfair competition, unfair and deceptive practices, misappropriation and unjust enrichment in violation of the statutory and/or common law of each state in which Kobo engaged in the unlawful conduct alleged herein, including New York General

Business Law §§ 133, 349, and 360-1 and California Business and Professions Code § 17200 *et seq.*; and violation of the right to publicity under the statutory and/or common law of each state in which Kobo engaged in the unlawful conduct alleged herein, including New York Civil Rights Law § 51, California common law and California Civil Code § 3344.

2. MAE is the owner by assignment of the intellectual property and publicity rights of Muhammad Ali, including the exclusive right to exploit and control the commercial use of Muhammad Ali's name, likeness, voice, image, trademarks, and other elements of Muhammad Ali's persona ("Muhammad Ali's Identity").

3. By virtue of Muhammad Ali's worldwide fame, and careful control over the commercialization of Muhammad Ali's Identity, those rights are of enormous commercial value.

4. One component of Muhammad Ali's Identity is his coined slogan FLOAT LIKE A BUTTERFLY, STING LIKE A BEE (the "Muhammad Ali Slogan"), which is the subject of U.S. federal trademark Registration Nos. 3,895,589 and 3,768,688, with a third registration about to issue.

5. MAE licenses the Muhammad Ali Slogan to third parties for commercial use for substantial sums of money.

6. Upon information and belief, Kobo markets and sells an electronic book reading device (the "eReader").

7. On or about June 17, 2011, Kobo took out a full-page advertisement for its eReader in the New York Times. That advertisement made commercial use of the Muhammad Ali Slogan and Muhammad Ali's name without permission from or compensation to MAE, in violation of MAE's trademark rights and publicity rights. See Exhibit A. Kobo's unauthorized use of the Muhammad Ali Slogan and Muhammad Ali's name was deliberate, willful, and intentionally designed

to reap the benefit of, trade on, and exploit the enormous fame, goodwill, value, and public recognition of Muhammad Ali's Identity.

8. Kobo's unlawful conduct caused and will continue to cause serious and irreparable harm to MAE. Consumers are likely to be confused as to a perceived affiliation, connection, association, sponsorship, endorsement, approval, or permission received from MAE that does not exist. Kobo's conduct also is likely to dilute the distinctive and source-identifying quality of the Muhammad Ali Slogan, and to damage, erode and diminish the economic value of the Muhammad Ali Slogan and name, which MAE alone has the right to commercially exploit. In addition, Kobo's conduct is likely to diminish, if not destroy, the opportunity for MAE to license Muhammad Ali's Identity to the manufacturer of competitive devices and eliminates the ability for MAE to offer any such manufacturer an exclusive license, which typically is of greater economic value.

#### **The Parties**

9. Muhammad Ali Enterprises, LLC is a limited liability company organized and existing under the laws of California with a principal place of business at 650 Madison Ave., 15th Floor, New York, NY 10022. MAE is the owner of Muhammad Ali's intellectual property and publicity rights, including all rights of publicity associated with the commercialization of Muhammad Ali's name, image, and likeness, the Muhammad Ali Slogan, and the trademarks at issue herein, which it uses and licenses to third parties. Muhammad Ali personally has an economic interest in the business and licensing activities of MAE.

10. Upon information and belief, Kobo, Inc. is a corporation organized and existing under the laws of Canada, with a place of business at 135 Liberty Street, Suite 101, Toronto, Canada, M6K 1A7. Kobo markets and sells an eReader.

### **Jurisdiction and Venue**

11. This action arises under 15 U.S.C. §§ 1051 *et seq.* and the statutory and common law of the states of New York, California and of every state in which Kobo engaged in the unlawful conduct alleged herein. This Court has subject matter jurisdiction over this action pursuant to 15 U.S.C. § 1121 and 28 U.S.C. §§ 1331 and 1338, and pursuant to 28 U.S.C. § 1332 in that the parties are a citizen of a State and a citizen of a foreign state and the amount in controversy exceeds \$75,000 exclusive of costs and interest, and has supplemental jurisdiction pursuant to 28 U.S.C. § 1367.

12. This court has personal jurisdiction over Kobo because, upon information and belief, Kobo does and transacts business in this district, and has purposely directed its activities to citizens and residents of this district, and because the harmful conduct that occurred was likely to cause, and caused, injury to MAE in this state and district.

13. Venue is proper pursuant to 28 U.S.C. § 1391.

### **Facts Common to All Claims**

#### **Muhammad Ali and Muhammad Ali's Identity**

14. Upon information and belief, Muhammad Ali is one of the most famous and iconic personalities in the United States, and in the world.

15. Muhammad Ali is an Olympic gold medalist and three-time World Heavyweight Champion who is widely known by the general public as one of the greatest and most famous boxers -- and cultural icons -- in history.

16. Muhammad Ali had a meteoric rise in the boxing world. Over the course of his amateur career, he won six Kentucky Golden Gloves titles, two national Golden Gloves titles, an Amateur Athletic Union National Title, and the gold medal in the Light Heavyweight division at the 1960 Summer Olympics. In his professional career, he fought and defeated other famous boxers in

numerous well-publicized and widely-watched fights. Those fights included, among many others, his fight against Doug Jones, which was named "Fight of the Year" for 1963, his dramatic defeat of Sonny Liston for the 1964 World Heavyweight Championship, his fight against Cleveland "Big Cat" Williams at the Houston Astrodome, which *Sports Illustrated* reported set an indoor world record at that time for the number of fans in attendance, three historic matches against Joe Frazier, including the 1971 match that was known as the "Fight of the Century" and the subsequent "Thrilla in Manila," and his upset win against George Foreman for his second World Heavyweight title in the fight known as the "Rumble in the Jungle."

17. Over the course of his career, Muhammad Ali developed a strong, unique, and recognizable public persona. In addition to his remarkable boxing skills, he was well known for his supreme confidence, recognizable speaking style, coined phrases, and memorable quips, all of which brought him substantial media attention and helped propel him to worldwide fame.

18. In 1975, *Sports Illustrated* named Muhammad Ali its "Sportsman of the Year." He was chosen to light the Olympic torch during the opening ceremonies for the 1996 Summer Olympic Games in Atlanta. He was named "Sportsman of the Century" by *Sports Illustrated*, "Sports Personality of the Century" by the BBC, "Athlete of the Century" by *GQ*, and "World Sportsman of the Century" by World Sports Award. Ring Magazine named him "Fighter of the Year" more times than any other fighter. He was inducted into the International Boxing Hall of Fame in 1990.

19. In addition to his fame as a boxer, Muhammad Ali has been in the public eye for his political activities, including his attempt to win the release of Americans kidnapped in Lebanon in 1985, his role in traveling to Iraq and helping to secure the release of 15 American hostages during the first Gulf War, and his promotion of various political and humanitarian causes. Among numerous other awards and honors, Muhammad Ali has received the Arthur Ashe Courage Award, Amnesty International's Lifetime Achievement Award, and Germany's Otto Hahn Peace

Medal. He was recognized as a "U.N. Messenger of Peace" for 1998 to 2008, and in that capacity traveled to Afghanistan in 2002 as a special guest of the UN on a good will mission. In 2005, he received the Presidential Citizens Medal and Presidential Medal of Freedom, the United States' most distinguished civil award.

20. Muhammad Ali has been the subject of several books and documentaries, including the 1996 Academy Award winning documentary "When We Were Kings" about the "Rumble in the Jungle" against George Foreman, and a major Hollywood film, *Ali*, that was released in December 2001.

21. According to an Associated Press study in 1993, Muhammad Ali was tied with Babe Ruth as the most recognized athlete, living or dead, in America, with more than 97% of Americans over the age of twelve recognizing both of those sports figures. In 1991, he received a Spirit of America Award, which called him the most recognized American in the world. According to a 2011 Q-Score Report, which measures the familiarity and appeal of brands, companies, celebrities, and television shows in the United States, Muhammad Ali ranked first among all athletes in familiarity and appeal with 12-64 years olds, 18-34 year olds, and households with incomes of \$75,000 and above.

22. Muhammad Ali referred to his unique fighting style as "Float Like A Butterfly, Sting Like A Bee," a phrase that he often chanted with his trainer Drew Bundini Brown. That phrase has become so well known as to instantly identify -- and be virtually synonymous with -- Muhammad Ali.

23. The famous phrase FLOAT LIKE A BUTTERFLY, STING LIKE A BEE is the subject of U.S. trademark Registration No. 3,895,589 for use on goods that include, among other things, books, journals, writing paper, writing pads, various other stationary and desk accessories, publications, and writing implements, as well as for, among other things, t-shirts,

sweatshirts, robes, pants, and hats, and Registration No. 3,768,688 for use on “[c]ups and mugs; coffee cups, tea cups and mugs; drinking glasses and glass mugs; lunch boxes.” FLOAT LIKE A BUTTERFLY, STING LIKE A BEE also is the subject of an allowed federal trademark application, Serial No. 78/970,537, for goods that include various toys and games, hand-held units for electronic games, entertainment services, and production of various forms of media, including records, videotape, motion pictures, and radio and television programs.

24. The Muhammad Ali Slogan, FLOAT LIKE A BUTTERFLY, STING LIKE A BEE, like the other aspects of Muhammad Ali’s Identity and persona, including Muhammad Ali’s name and image, is famous in the United States and throughout the world.

25. As a result of Muhammad Ali’s remarkable career and life, and the substantial investment in developing and protecting his public persona, Muhammad Ali’s Identity enjoys enormous fame and goodwill, with substantial commercial value. At least one U.S. federal court has found that “in the course of [Muhammad Ali’s] public career, [Muhammad Ali] has established a commercially valuable proprietary interest in his likeness and reputation, analogous to the good will accumulated in the name of a successful business entity.”

26. In or about April 2006, MAE was formed for the purpose of promoting Muhammad Ali’s legacy throughout the United States and the world, including the licensing of Muhammad Ali’s Identity. At about that time, MAE was assigned all right, interest, and title to Muhammad Ali’s Identity, including the exclusive right to exploit and commercialize Muhammad Ali’s name, likeness, and intellectual property, which includes the Muhammad Ali Slogan and name.

27. As the owner of Muhammad Ali’s publicity and intellectual property rights, MAE has the right, and responsibility, to protect and preserve the commercial value of all aspects of Muhammad Ali’s Identity. MAE has the exclusive right to determine the branding and licensing strategy for commercial use of Muhammad Ali’s Identity and the exclusive right to determine which

commercial uses it wishes to authorize and at what price. As the owner of trademarks, including the Muhammad Ali Slogan, MAE has the right and the obligation to monitor and exert quality control over the use of those marks.

28. MAE maintains a robust and carefully managed licensing program. An application form for prospective licensees is available on the official Web site of Muhammad Ali, at [http://ali.com/pdfs/licensing\\_applicaiton\\_2011.pdf](http://ali.com/pdfs/licensing_applicaiton_2011.pdf). That application requires prospective licensees to provide extensive information about the company and the intended product or service for which a license is requested, including information about potential sales and intended distribution, proposed marketing and advertising plans, manufacturing capability, and corporate finances. The application also requires the prospective licensee to provide four retail and licensing references, and the process for determining whether to grant a license typically requires the prospective licensee to provide a product sample or prototype. See Exhibit B.

29. MAE has licensed the Muhammad Ali Slogan for use in television commercials and print advertisements by blue chip companies, including Gatorade, Intel and Epson. Those companies paid MAE significant sums for the right to use the Muhammad Ali Slogan and to benefit from the good will and consumer recognition associated with its immediate identification with Muhammad Ali's Identity. In fact, in 2010, Gatorade built an entire advertising campaign around the use of the Muhammad Ali Slogan, which appeared in television, print and online media. See Exhibits C, D, and E for examples of those advertisements and Exhibit F for a list of other licensees, available at [http://ali.com/marketing\\_licensee\\_list.php](http://ali.com/marketing_licensee_list.php).

30. MAE has the right to control the use of the famous registered slogan FLOAT LIKE A BUTTERFLY, STING LIKE A BEE and to protect and control the publicity value in all aspects of Muhammad Ali's Identity, including the use of the Muhammad Ali name and Muhammad Ali Slogan.

31. Unauthorized commercial use of Muhammad Ali's Identity, including the Muhammad Ali name and Muhammad Ali Slogan, deprives MAE of its right to be compensated for such use, and further deprives MAE of its right and ability to maximize the commercial value of such use, such as by offering an exclusive license for a specific product category, negotiating the most favorable licensing terms, and maintaining control over the use of Muhammad Ali's Identity and trademarks.

**Kobo's Unauthorized Use of the Muhammad Ali  
Name and Muhammad Ali Slogan**

32. On or about June 17, 2011, Kobo took out a full-page advertisement in the New York Times to promote its eReader (the "Kobo Ad").

33. The Kobo Ad for its eReader featured as its attention-getter the Muhammad Ali Slogan and Muhammad Ali name, appearing as the most prominent wording on the page. Underneath the wording "Float like a butterfly, sting like a bee. — *Muhammad Ali*," appears the wording "Lightweight. Powerful. Intuitive. The new Kobo eReader Touch Edition. Just in time for Father's Day." At the bottom left of the Kobo Ad appear three statements: " 'A real contender' — *Computerworld*", " 'The best bet right now' — *CrunchGear*", and " 'The look of a winner' — *Gizmodo*." Each statement is a reinforcement of the persona of Muhammad Ali. At the bottom right appears the KOBO logo. See Exhibit A.

34. The Kobo Ad is a full page advertisement for the product that Kobo sells; it is purely commercial in nature.

35. Muhammad Ali spent a lifetime building his own reputation and the good will that is embodied in his name and persona, including the Muhammad Ali Slogan and trademark FLOAT LIKE A BUTTERFLY, STING LIKE A BEE. Since its acquisition of the rights to Muhammad Ali's publicity and intellectual property rights, MAE has invested considerable resources in protecting and continuing to develop the value of Muhammad Ali's Identity and trademarks.

That reputation, value, and good will ride on each commercial use that is associated with Muhammad Ali's Identity.

36. There is no legitimate reason for Kobo's misappropriation of the distinctive and famous Muhammad Ali Slogan and Muhammad Ali name to advertise its product.

37. Kobo did not seek or receive authorization from MAE to make commercial use of the Muhammad Ali Slogan in the Kobo Ad.

38. Kobo did not seek or receive authorization from MAE to make commercial use of Muhammad Ali's name in the Kobo Ad.

39. Kobo did not compensate MAE in any way for the commercial use of the Muhammad Ali Slogan or Muhammad Ali's name in the Kobo Ad.

40. The prominent use of the famous Muhammad Ali Slogan and Muhammad Ali's name in the Kobo Ad creates initial interest and immediately conjures up the persona, identity, and image of Muhammad Ali, and conveys the impression of an association, endorsement, or permission to use Muhammad Ali's Identity and/or the Muhammad Ali Slogan that does not exist. In context with the statements by *Computerworld*, *CrunchGear* and *Gizmodo* referred to in Paragraph 33, it appears as if Muhammad Ali personally is endorsing the eReader by stating that it "Floats Like a Butterfly and Stings Like a Bee" and/or by permitting Kobo to use his name and slogan.

41. Kobo's unauthorized use of Muhammad Ali's Slogan and Muhammad Ali's name has wrongfully removed from MAE control over the quality of the products associated with Muhammad Ali's Identity.

42. The unauthorized use of the famous Muhammad Ali Slogan and Muhammad Ali's name in the Kobo Ad dilutes the distinctive nature of that famous trademark.

43. In using Muhammad Ali's Slogan and Muhammad Ali's name in the Kobo Ad, Kobo has sought to and has traded on and profited from Muhammad Ali's and MAE's efforts

and investments without using its own resources, investing its own time or money, or exerting any creative efforts of its own, and without going through the approval process or paying the fees required of MAE's authorized licensees.

44. The use of the famous Muhammad Ali Slogan and Muhammad Ali's name in an advertisement for the Kobo eReader significantly diminishes, if not destroys, the opportunity for MAE to license Muhammad Ali's Identity to the manufacturer of competitive devices and eliminates the ability for MAE to offer any such manufacturer an exclusive license, which typically is of greater economic value.

45. Kobo already has benefited at the expense of MAE by making commercial use of valuable property without authorization or compensation. Absent an injunction, Kobo may continue to benefit at MAE's expense, continue to create a likelihood of consumer confusion as to affiliation, connection, association, sponsorship, endorsement, approval, or permission, continue to dilute the distinctive nature of the Muhammad Ali Slogan, continue to infringe the publicity rights in Muhammad Ali's Identity, and continue to be unjustly enriched.

46. MAE has no adequate remedy at law.

#### Count I

#### Trademark Infringement, Unfair Competition and False Designation of Origin under Sections 32 and 43(a) of the Lanham Act, 15 U.S.C. §§ 1114 and 1125(a)

47. MAE repeats and realleges paragraphs 1 - 46 as if fully set forth herein.

48. Kobo knowingly, willingly and intentionally infringed MAE's trademark rights by making unauthorized use of the federally registered Muhammad Ali Slogan, FLOAT LIKE A BUTTERFLY, STING LIKE A BEE.

49. The unauthorized use in commerce by Kobo of the Muhammad Ali Slogan violates Sections 32 and 43(a) of the Lanham Act, 15 U.S.C. §§ 1114 and 1125(a), and is likely to cause confusion, mistake or to deceive the consuming public with respect to Kobo's affiliation,

connection or association with, or endorsement, sponsorship, or permission by Muhammad Ali or MAE.

50. The unauthorized use in commerce by Kobo of the Muhammad Ali Slogan usurps the reputation and good will associated with the FLOAT LIKE A BUTTERFLY, STING LIKE A BEE trademarks and Muhammad Ali's Identity and constitutes unfair competition.

51. As a result, the actions of Kobo complained of herein, unless enjoined by this Court, will cause MAE to suffer irreparable harm; to suffer damage and injury to its business, reputation and good will; and to sustain loss of revenues and profits while unjustly enriching Kobo.

52. The actions of Kobo complained of herein constitute an exceptional case within the meaning of 15 U.S.C. § 1117(a) of the Lanham Act.

## Count II

### Trademark Dilution under Section 43(c) of the Lanham Act, 15 U.S.C. § 1125(c)

53. MAE repeats and realleges the allegations contained in paragraphs 1 - 52 as if fully set forth herein.

54. By virtue of Muhammad Ali's personal fame, and the exclusive and continuous use in commerce and substantial marketing, advertising, sales, and licensing of products in connection with Muhammad Ali's Identity and the federally registered trademarks FLOAT LIKE A BUTTERFLY, STING LIKE A BEE, Muhammad Ali's Slogan has become and is widely recognized as a designation of source and, as such, is a famous mark within the meaning of Section 43(c) of the Lanham Act, 15 U.S.C. § 1125(c)(1), and became famous long prior to any use of the marks by Kobo.

55. Kobo's willful acts complained of herein are in bad faith and are likely to cause dilution of Muhammad Ali's Slogan in that such use is likely to erode and whittle away the source-identifying qualities of Muhammad Ali's Slogan.

56. As a direct and proximate result of Kobo's actions complained of herein, MAE has suffered and, absent an injunction, will continue to suffer irreparable harm, damage and injury.

57. MAE has no adequate remedy at law.

### Count III

#### Violation of the Right to Publicity Under New York Civil Rights Law § 51 and the Law of Every State in Which Kobo Engaged in the Unlawful Conduct Alleged Herein

58. MAE repeats and realleges the allegations contained in paragraphs 1 - 57 as if fully set forth herein.

59. Kobo used the Muhammad Ali Identity, including Muhammad Ali's name, for advertising purposes or for the purposes of trade without obtaining prior written consent. The Kobo Ad was published in the New York Times which, upon information and belief, is distributed in New York and every other state in the nation.

60. Kobo's acts, as set forth herein, violate Muhammad Ali's and MAE's right to publicity under New York Civil Rights Law § 51 and the statutory and/or common law of every other state in which the Kobo Ad was published or seen.

### Count IV

#### Violation of the Right to Publicity Under California Common Law and California Civil Code § 3344 and the Law of Every State in Which Kobo Engaged in the Unlawful Conduct Alleged Herein

61. MAE repeats and realleges the allegations contained in paragraphs 1 - 60 as if fully set forth herein.

62. Kobo used the Muhammad Ali Identity, including Muhammad Ali's name, for advertising purposes or for the purposes of trade without obtaining prior written consent. The

Kobo Ad was published in the New York Times which, upon information and belief, is distributed in California and every other state in the nation.

63. Kobo's acts, as set forth herein, violate Muhammad Ali's and MAE's right to publicity under California common law and California Civil Code § 3344 and the statutory and/or common law of every other state in which the Kobo Ad was published or seen.

#### Count V

#### **Trademark Infringement, Unfair Competition, and Deceptive Acts and Practices under New York Common and Statutory Law, and of the Law of Every State in Which Kobo Engaged in the Unlawful Conduct Alleged Herein**

64. MAE repeats and realleges the allegations contained in paragraphs 1 - 63 as if fully set forth herein.

65. Kobo's acts, as set forth herein, constitute trademark infringement, unfair competition, and deceptive acts and practices under the common law of the State of New York and every other state in which the Kobo Ad was published or seen. Kobo's actions were undertaken in bad faith and are willful and with the intent to deceive and confuse, and are likely to cause confusion and deception, and to misappropriate the FLOAT LIKE A BUTTERFLY, STING LIKE A BEE trademark and the reputation and good will associated with that mark.

66. Kobo's acts, as set forth herein, constitute the assumption, adoption or use in bad faith and with the intent to deceive or mislead the public, for advertising purposes or purposes of trade, of a designation or style, or a symbol or simulation thereof which may deceive or mislead the public as to the identity of Kobo or its goods and services or as to the connection of Kobo with MAE, in violation of New York General Business Law § 133.

67. Kobo's acts, as set forth herein, constitute deceptive acts or practices under New York General Business Law § 349 and under the statutory and/or common law of every state in which the Kobo Ad was published or seen.

68. By reason of Kobo's activities complained of herein, MAE has been and will continue to be irreparably harmed and has no adequate remedy at law.

#### Count VI

##### **Trademark Infringement, Unfair Competition, and Deceptive Acts and Practices under California Common and Statutory Law, and of the Law of Every State in Which Kobo Engaged in the Unlawful Conduct Alleged Herein**

69. MAE repeats and realleges the allegations contained in paragraphs 1 - 68 as if fully set forth herein.

70. Kobo's acts, as set forth herein, constitute trademark infringement, unfair competition, and deceptive acts and practices under the common law of the State of California and every other state in which the Kobo Ad was published or seen. Kobo's actions were undertaken in bad faith and are willful and with the intent to deceive and confuse, and are likely to cause confusion and deception, and to misappropriate the FLOAT LIKE A BUTTERFLY, STING LIKE A BEE trademark and the reputation and good will associated with that mark.

71. Kobo's acts, as set forth herein, are unfair and unlawful in violation of California Business and Professions Code § 17200 *et seq.* and under the statutory and/or common law of every state in which the Kobo Ad was published or seen.

72. Kobo's acts, as set forth herein, constitute deceptive acts or practices under California Business and Professions Code § 17200 *et seq.* and under the statutory and/or common law of every state in which the Kobo Ad was published or seen.

#### Count VII

##### **Dilution and Injury to Business Reputation Under New York Statutory Law N.Y. Gen. Bus. Law § 360(l)**

73. MAE repeats and realleges the allegations contained in paragraphs 1 - 72 as if fully set forth herein.

74. Kobo's acts, as set forth herein, are likely to dilute, blur and detract from the distinctiveness of the Muhammad Ali Slogan in violation of New York General Business Law § 360(l) and the law of every state in which the Kobo Ad was published or seen.

75. Kobo's acts of dilution, unless restrained, will cause great and irreparable injury to MAE and to the value and good will represented by the Muhammad Ali Slogan for which MAE has no adequate remedy at law.

**WHEREFORE**, MAE respectfully requests that this Court enter judgment in its favor and against Kobo as follows:

a. Preliminarily and permanently enjoining Kobo, its officers, agents, servants, employees, subsidiaries, parents, affiliates, related entities, suppliers, customers, successors, assigns and attorneys, and those acting in concert with, by or through them, from (1) using in any manner the Muhammad Ali Slogan, Muhammad Ali's name, or any other aspect of Muhammad Ali's Identity, or any derivation, variation or colorable imitation thereof; (2) in any way seeking to, directly or indirectly, misappropriate the good will and/or reputation associated with Muhammad Ali's Identity, including the Muhammad Ali Slogan and Muhammad Ali's name; (3) in any way creating the impression, directly or indirectly, that Kobo's product has been or is in any way connected to or affiliated with or approved or endorsed by Muhammad Ali or MAE; (4) otherwise infringing the Muhammad Ali Slogan; (5) otherwise violating the publicity rights in Muhammad Ali's Identity; (6) in any other manner violating 15 U.S.C. §§ 1114, 1125(a) or 1125(c), engaging in trademark infringement, trademark dilution, unfair competition, misappropriation, or deceptive acts or practices under the statutory and/or common law of any state in which Kobo does business, or violating the publicity rights in Muhammad Ali's Identity under the statutory and/or common law of any state in which Kobo does business; or (7) engaging, inducing,

contributing to, causing, or authorizing any individual or entity to perform any of the aforementioned acts.

b. Directing Kobo pursuant to 15 U.S.C. §§ 1116(a) or otherwise, to file with this Court and serve on MAE within thirty (30) days of entry of any injunction, or such other time as directed by the Court, a report in writing and under oath setting forth in detail the manner and form in which Kobo has complied with the injunction.

c. Ordering the recall and destruction of any marketing materials, plates, prints, presses, advertisements, receptacles, displays and products of Kobo, the manufacture or sale of which is enjoined pursuant to any injunction ordered by the Court, or that violate 15 U.S.C. § 1125(a).

d. Ordering Kobo to pay MAE:

(i) All monetary damages sustained and to be sustained by MAE as a consequence of Kobo's conduct complained of herein, including all of Kobo's profits resulting from infringement and violation of publicity rights, all of MAE's lost profits as a result of the unauthorized use of Muhammad Ali's Identity, including the Muhammad Ali Slogan and Muhammad Ali's name, and profits and gains of any kind resulting from Kobo's willful violations, in an amount to be determined at trial, and three times the amount thereof pursuant to 15 U.S.C. § 1117(a).

(ii) MAE's reasonable attorneys' fees, disbursements, costs and expenses in connection with this action, pursuant to 15 U.S.C. § 1117(a), N.Y. Gen. Bus. Law § 349(h), California Civil Code § 3344 and the applicable law of any other state in which the Kobo Ad was published or seen.

(iii) Exemplary damages under New York Civil Rights Law § 51.

(iv) Punitive damages.

e. Awarding MAE such other and further relief as this Court deems just and proper.

Dated: New York, NY  
July 13, 2011

Respectfully Submitted,

PAUL, HASTINGS, JANOFSKY &  
WALKER LLP

A handwritten signature in cursive script, reading "Robert L. Sherman", is written over a horizontal line.

By: Robert L. Sherman (RS 5520)  
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Attorneys for Muhammad Ali Enterprises, LLC

# **EXHIBIT A**



Float like a butterfly,  
sting like a bee

— *Muhammad Ali*



Lightweight. Powerful. Intuitive.  
The new Kobo eReader Touch Edition.  
Just in time for Father's Day.

Learn more at: [kobo.com/eReader](http://kobo.com/eReader)

"A real contender" — *Computerworld*

"The best bet right now" — *CrunchGear*

"The look of a winner" — *Gizmodo*



# **EXHIBIT B**

**CONFIDENTIAL**

**Muhammad Ali Enterprises, LLC**  
**PROSPECTIVE LICENSEE**  
**Application Information Form!**

**BASIC COMPANY INFORMATION**

Company Name: \_\_\_\_\_  
 Company Address: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_ (City) \_\_\_\_\_ (State) \_\_\_\_\_ (Zip)  
 Contact Person: \_\_\_\_\_ Title: \_\_\_\_\_  
 Telephone: (\_\_\_\_) \_\_\_\_\_  
 Facsimile: (\_\_\_\_) \_\_\_\_\_  
 E-mail Address: \_\_\_\_\_ Web Site Address: \_\_\_\_\_  
 Artwork & Approvals Contact (name/phone/e-mail): \_\_\_\_\_  
 Royalty & Reporting Contact (name/phone/e-mail): \_\_\_\_\_  
 Marketing Contact: (name/phone/e-mail): \_\_\_\_\_

**PRODUCT INFORMATION**

Description/list of product(s) for which you seek a license: \_\_\_\_\_  
 Does your company currently manufacture or sell an item similar to the one you are seeking to license?  
 Yes \_\_\_\_\_ No \_\_\_\_\_ (Please ✓)  
 Estimated wholesale selling price/unit: \_\_\_\_\_  
 Estimated retail price/unit: \_\_\_\_\_  
 When will a prototype or sample of the product to be sold be available for review? \_\_\_\_\_  
 Total production time: \_\_\_\_\_  
 Proposed release date: \_\_\_\_\_

**OWNERSHIP/MANAGEMENT INFORMATION**

Principal Owners (Complete Name, Title and Business Address)

- |                                     |                                     |
|-------------------------------------|-------------------------------------|
| 1. _____<br>_____<br>_____<br>_____ | 2. _____<br>_____<br>_____<br>_____ |
| 3. _____<br>_____<br>_____<br>_____ | 4. _____<br>_____<br>_____<br>_____ |

Principal Management:

1. President/CEO: \_\_\_\_\_  
 2. Vice President(s): \_\_\_\_\_  
 3. Sales Director: \_\_\_\_\_  
 4. Chief Financial Officer: \_\_\_\_\_



**SALES AND DISTRIBUTION INFORMATION**Distribution capability: (Please ☒) International \_\_\_\_\_ Domestic (US) \_\_\_\_\_ Regional \_\_\_\_\_

Would you plan to distribute this product:

1. Only in certain states/regions, if so, number of states/region: \_\_\_\_\_
2. International territories, if so, specify: \_\_\_\_\_

Sales Force:

1. Own Sales Force, if so, number of sales staff: \_\_\_\_\_
2. Reps, Jobbers, etc., if so, number of: \_\_\_\_\_
3. Agents, if so, number of agents: \_\_\_\_\_
4. Total number of sales force: \_\_\_\_\_

Please describe your existing distribution channels:

Type of Account	% of Sales Volume	Main Accounts Sold To (please list)
Mass Merchants		
Discounters		
Department Stores		
Drug Chains		
Catalog Showrooms		
Toy Stores		
Mail Order Catalog		
Direct Mail		
Collectors Market		
Grocery Chains		
Warehouse Clubs		
Hardware Stores		
Specialty Stores		
Military Exchanges		
Sporting Goods Stores		
Internet		
Other (please specify)		

Estimate of *Annual Wholesale Sales Volume* of the items you wish to manufacture under this license:

(Please specify currency)

Year 1: \_\_\_\_\_ Year 2: \_\_\_\_\_

Accounts to whom you plan to sell the licensed products:

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_
7. \_\_\_\_\_

If you currently manufacture a similar item, what was its wholesale dollar volume for most recent year?

Company sale volume for most recent year: \_\_\_\_\_

Company sale volume for previous year: \_\_\_\_\_



**REFERENCES**Please list four retail and licensing references we can contact for an opinion on your product line and performance:

	Company Name	Contact Person/Title	Telephone & E-mail
1.			
2.			
3.			
4.			

**MARKETING INFORMATION**Do you plan to conduct any advertising or promotion to support the product? Yes ☐ No ☐If yes, what type? (Please  $\checkmark$ )

Consumer Advertising \_\_\_\_\_

Trade Advertising \_\_\_\_\_

In-Store Materials \_\_\_\_\_

Sales/Trade Incentives \_\_\_\_\_

Press Release \_\_\_\_\_

Co-Op Advertising \_\_\_\_\_

Other: (Specify) \_\_\_\_\_

Does your company use an advertising agency? Yes \_\_\_\_\_ No \_\_\_\_\_ (Please  $\checkmark$ )

Agency's Name: \_\_\_\_\_

Agency's Address: \_\_\_\_\_

Key Contact: \_\_\_\_\_

Telephone Number: (\_\_\_\_) \_\_\_\_\_

E-mail: \_\_\_\_\_

What amount of advertising, promotion and merchandising funds do you plan to spend in support of this new licensed product for the first year, should you receive the license? \$ \_\_\_\_\_

Does your company have product design and artwork capability? Yes \_\_\_\_\_ No \_\_\_\_\_ (Please  $\checkmark$ )If yes, is design done in house \_\_\_\_\_ or by an outside agency \_\_\_\_\_? (Please  $\checkmark$ )Does your company have a formal Quality Control Program? Yes \_\_\_\_\_ No \_\_\_\_\_ (Please  $\checkmark$ )**LICENSING INFORMATION**

Does your company currently manufacture any other products under licensing contracts?

Yes \_\_\_\_\_ No \_\_\_\_\_ (Please  $\checkmark$ )

If yes, please specify which licenses your company currently holds:

Licensing Company	Property	Years Under License



**Credit Reference:**

Company Name: \_\_\_\_\_

Contact Person: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_  
(Street)

\_\_\_\_\_  
(City) (State) (Zip)

Telephone: ( ) \_\_\_\_\_ Fax: ( ) \_\_\_\_\_

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_

Information Supplied By: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Date: \_\_\_\_\_

# EXHIBIT C



Float like a butterfly,

sting like an apis mellifera.

These are the winners of the Intel® International Science and Engineering Fair. Over 1,500 of the world's brightest young scientists, brought together by Intel, whose achievements will lead to the scientific breakthroughs of tomorrow.

Meet them at [intel.com/inside](http://intel.com/inside)

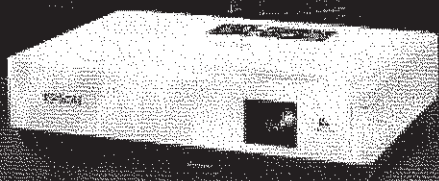
Sponsors of Tomorrow.™



# **EXHIBIT D**

Floats like a Butterfly.

Stings like a Bee.



**EPSON®**  
EXCEED YOUR VISION

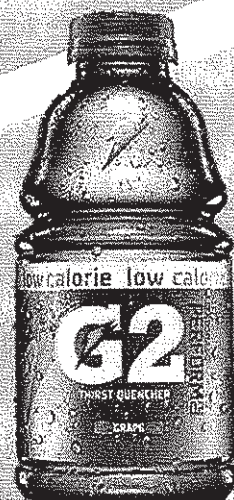
# EXHIBIT E

# FLOAT LIKE A BUTTERFLY STING LIKE A BEE

— Muhammad Ali



The power of G2 is the fuel  
that keeps you going.



# **EXHIBIT F**

HOME | NEWS

THE LEGEND

PHOTO GALLERY

VIDEOS

INTERACT

MY ALI STORY

ALI STORE

MAIN | LICENSEES | ADVERTISING | SPONSORSHIPS | CHARITABLE DONATIONS | AUTOGRAPHS | INFRINGEMENTS

# LICENSING, ADVERTISING & SPONSORSHIPS

## CURRENT LICENSEES

Accessories | Apparel | Collectibles | Electronics | Fine Art | Gift and Novelty | Publishing and Stationary | Sporting Goods | Video Games

### Accessories

#### Company X Accessories

100 Ridings Way (PO Box 372)

Ambler, PA 19002

<http://www.companyxaac.com>

Matt Segal

215-793-0443

[msegal@companyxacc.com](mailto:msegal@companyxacc.com)

Products: Electronic Game Accessories

Territory: Worldwide

#### Elmo & Montegrappa S.p.A.

Via Ca' Erizzo nos. 43/45

36061 Bassano del Grappa (Vicenza)

ITALY

<http://www.montegrappa.com>

Gavin Brown

34 963 427 423

[gavin.brown@crescendoconsultants.com](mailto:gavin.brown@crescendoconsultants.com)

Products: Luxury Pens

Territory: Worldwide

#### Kothai

51 Rue Sainte

Macseille 13001

France

[www.kothai.fr](http://www.kothai.fr)

Avalon Juliana

33 0 491 909 123

[avalon@kothia.fr](mailto:avalon@kothia.fr)

Products: Bags & accessories to include wallets, laptop sleeves, ipad sleeves

Territor: Europe

#### Music Skins

24 15th St. Suite 202

Brooklyn, NY 11215

[www.MusicSkins.com](http://www.MusicSkins.com)

Jed Seifert

(646) 827-4271

[jed@music-skins.com](mailto:jed@music-skins.com)

Products: Vinyl Skins for Personal Devices

Territory: Worldwide

#### New Era Cap

160 Delaware Ave.

Hamburg NY 14202

<http://www.neweracap.com>

Darrell De Bey

716-604-9000

[darrelld@neweracap.com](mailto:darrelld@neweracap.com)

Products: Headwear

Territory: Worldwide

**Wurkin Stiffs**

6341 Porter Road, Unit 12  
Sarasota, FL 34240  
<http://www.wurkinstiffs.com>

Jonathan Boos  
941-379-8163  
[jonboos@wurkinstiffs.com](mailto:jonboos@wurkinstiffs.com)

Products: cufflinks, collar stays, business card holders, money clips and tie bars  
Territory: US, Canada, UK, Germany, Ireland, and Switzerland

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**Apparel**

**A Moda S.p.A.**

Località Petrona 18/D  
50038 Scarperia (Florence)  
ITALY

<http://www.amoda.com>

Alessandro Bastagli

(+39) 055.849160

[amoda@amoda.com](mailto:amoda@amoda.com)

Products: Activewear and sportswear for men, women, children co-licensed with Everlast

Territory: Italy, Republic of San Marino, and Vatican State

**American Classics, Inc.**

339 County Road 591  
Hanceville, Alabama 35077  
<http://www.americanclassics.bz>

David E. Brown

256-737-9995

[david@americanclassics.bz](mailto:david@americanclassics.bz)

Products: T-shirts

Territory: U.S., its territories and possessions

**Australian Horizons Trading Pty Ltd**

96 Herbert St, Northcote  
Vic. 3070, Australia  
Victoria Teloar  
61 3 9489 9899

[victoriateloar@australianhorizons.com.au](mailto:victoriateloar@australianhorizons.com.au)

Products: Men's & women's outerwear (including but not limited to bottoms, tops, singlets, t-shirts, skirts, dresses, leggings, jackets, hoodies)

Territory: Australia and New Zealand

**C-Life Group**

1400 Broadway, suite 700  
New York, NY 10018  
<http://www.c-lifegroup.com/default.asp>

Heather K. McAvoy - Miceli

212-294-0248

[Heather.McAvoy@c-lifegroup.com](mailto:Heather.McAvoy@c-lifegroup.com)

Products: T-shirts, fleece, thermals, onesies - Men's, Women's, Juniors, girls, boys, toddler, baby

Territory: US territories and Possessions and Canada, for distribution in The Gap Stores only

**Cotton On Group**

14 Shepherd Court, North Geelong  
Vic, Australia 3215

Tara Stone

61 3 5277 7655

[taras@cottonon.com.au](mailto:taras@cottonon.com.au)

Products: Boy's t-shirts (1-10 yo), Boy's hoodies (1-10 yo), Men's t-shirts, Men's hoodies, notebooks, laptop cases, mugs, diaries

Territory: Australia & New Zealand

**DesignWorks PTY LTD**

8-14 Hall St  
Hawthorn, VIC 3123 Australia  
Inge Coppinger

61 3 8823 8263

[ingec@designwcc.com.au](mailto:ingec@designwcc.com.au)

Products: Men's and Women's t-shirts, tank tops and hoodies. Fashion accessories (caps, bags, backpacks, and belts only).

Territory: Australia, New Zealand, South Africa (Jay Jays stores only)

**Dolce & Gabbana**

Via Goldoni 10

20129 Milan, Italy  
 www.dolcegabbana.com  
 Maria Grazia Bergomi  
 39-02-11427-1  
 Mariagrazia.bergomi@dolcegabbana.it  
 Products: Apparel Collection  
 Territory: Worldwide

**Fabric Flavours Ltd.**  
 571 Finchley Road  
 London NW3 7BN United Kingdom  
 http://www.fabricflavours.com  
 Ezekiel Sweiry  
 011 44 20 7 195 2234  
 Ezekiel@fabricflavours.com  
 Products: Children's T-shirts, pajamas, sweatshirts (Newborn to 16 years old)  
 Territory: United Kingdom

**Fipo Group ApS**  
 Esbjergvej 101  
 Kolding, DENMARK 6000  
 http://www.fipogroup.com  
 Christina Datum Nielsen  
 (+45) 76363500  
 Christina.nielsen@fipogroup.com  
 Products: Apparel & Accessories, including: T's / Polo, sweatshirts & pants, nightwear, underwear, socks, hats, caps, key rings/ hanger, belt, bandana, tie, cold weather accessories. Housewares including: Bedding, towels, blankets, wall stickers, tableware, place mats, bags.  
 Territory: Scandinavia, Germany, Netherlands, France, Spain

**Isaac Morris, Ltd.**  
 20 West 33rd Street  
 New York, NY 10001  
 http://www.isaacmorris.com  
 Joseph Mansour  
 646-827-0036  
 jmansour@isaacmorris.com  
 Products: T-shirts, fashion tops, hoodies/outerwear, swimwear, including board shorts and rash guards, lounge pants  
 Territory: U.S., its territories and possessions, Canada and Mexico

**JEM Sportswear**  
 459 Park Ave.  
 San Fernando, CA 91340  
 http://www.jemsportswear.com  
 Randi Spieker  
 randi.spieker@jemsportswear.com  
 818.365.9361  
 Products: t-shirts, sweatshirts & fleece-tops  
 Territory: US territories & possessions in the following retail channels: Gap Outlet, Gap, Old Navy, Target, WalMart and Pac Sun

**Junction 38**  
 Studio 100, 6 The Broadway  
 Mill Hill, London, NW7 3LL, UK  
 http://www.junction38.com  
 Debra Saidman  
 020 8959 5592  
 debra@junction38.com  
 Products: Kids Outerwear 3-16yrs (t-shirts & hooded tops) Adult Outerwear, Loungewear & Boxers  
 Territory: UK, Ireland, & Channel Islands

**Lancaster Apparel Limited**  
 1484 Frances Street  
 Vancouver, BC, Canada V5L1Y9  
 http://www.copasetic.ca  
 Jesse Katz  
 604-737-2269  
 Jesse@lancastervintage.com  
 Products: T-shirts  
 Territory: Canada and worldwide only in Urban Outfitters

**NO MAS**  
 902 Broadway Penthouse  
 NY, NY 10010  
 http://www.nomas-nyc.com  
 Christopher Isenberg

212-388-0332  
ci@nomas-nyc.com  
Products: Men's sportswear, baseball hats, winter hats, limited edition prints, limited edition book  
Territory: Worldwide

**Pacific Brands Sport & Leisure**  
300 Lorimer Street  
Port Melbourne, Victoria 3207  
www.everlastusa.com.au  
Simon Hibbs  
613 8671 1611  
shibbs@pacbrands.com.au  
Products: Apparel co-licensed with Everlast; to include t's & sweatshirts, fleece hoodies and jackets single's, pants, shorts.  
Territory: Australia and New Zealand for Foot Locker stores

**Playcorp Pty. Ltd.**  
Level 1, 425 St Kilda Road  
Melbourne VIC 3004  
AUSTRALIA  
http://www.playcorp.com.au  
Con Goutzoulas (Agent)  
61 3 9520 1000  
cong@merchantwise.com.au  
Products: Apparel, Headwear and Housewares.  
Territory: Australia and New Zealand

**Santex Moden GMBH**  
Marshallstraße 1  
D-62146 Wuersele GERMANY  
http://www.santex.de  
Jürgen Ptok  
+49 2405/480-224  
j.ptok@santex.de  
Products: T shirts, Sweatshirts, Long sleeve shirts, Polo shirts and Bags  
Territory: Germany, Austria & Switzerland + Inditex Group of Companies (such as Zara).

**Streamline Design and Silkscreen**  
1299 S. Weils Rd  
Ventura, CA 93004  
www.oldguysrule.com  
Thom Hill  
805-884-1025  
thom@coastalclassics.net  
Products: Co-branded Old Guys Rule t-shirts, fleece, and caps  
Territory: US

**Trevco, Inc.**  
1900 Stephenson Highway  
Troy, MI 48063  
http://www.trevcoinc.com  
Jim George  
248.526.1400  
jpg@trevcoinc.com  
Products: Adult, Junior, Youth & Infant T's  
Territory: US, Territories & Possessions

**Uniqlo Co. Ltd.**  
Kitanomaru Square 4F 13-12 Kudan-kita 1cho-me  
Chiyoda-ku Tokyo 102-0073 JAPAN  
http://www.uniqlo.com  
Noriko Yamazaki  
+81.3.6272.0462  
noriko.yamazaki@uniqlo.co.jp  
Products: T-shirts  
Territory: Uniqlo stores in Japan, China, Hong Kong, Korea, United Kingdom, United States, France, Russia, and Singapore.

**Vintage 55**  
Corso San Gottardo 13/15  
Milano 20136  
www.vintage55.com  
Deborah Locatelli  
0039 (0)2 89410393  
deborah.locatelli@vintage55.com  
Products: Men's apparel- t-shirts, fleeces, fleece pants and shorts. Spring/Summer 2012 collection

Territory: Italy, France, Spain, UK, Germany, Austria, Switzerland, Belgium, Holland, Luxembourg, Turkey, Greece, Dubai, Hong Kong, Korea, China, US, Japan, Egypt, Israel, Sweden, Norway, and Denmark.  
High end department stores, boutiques, and Vintage 55 stores.

**Vintage Sports Pte. Ltd.**

27 Harrison Road #05-01  
Singapore 369647  
Francis Kew  
+65.63823133  
francis@vintagesp.com  
Products: Apparel co-licensed with Everlast.  
Territory: Singapore, Malaysia, Indonesia and Vietnam

**Worn Free LLC**

13428 Maxella Ave., Suite #506  
Marina Del Ray, CA 90292  
<http://www.wornfree.com>  
Steve Coe  
323-244-2708  
Steve@wornfree.com  
Products: Duplicate items of apparel that Muhammad Ali wore during his lifetime or items of apparel that feature specific designs that were on items of apparel that Muhammad Ali wore  
Territory: Worldwide

**Zazzle**

1900 Seaport Boulevard  
Redwood City, CA 94063  
[www.zazzle.com](http://www.zazzle.com)  
Joyce Williams  
650-261-3345  
joyce.williams@zazzle.com  
Products: various customizable products  
Territory: Worldwide

**Zion Rootswear**

465 Tresca Road  
Jacksonville, FL 32225  
[www.zionrootswear.com](http://www.zionrootswear.com)  
Michael Conley  
904-425-4411 ext 226 mike@zionrootswear.com  
Products: t-shirts  
Territory: US

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**Collectibles**

**Bradford Exchange**

9333 North Milwaukee Avenue  
Niles, IL 60714  
<http://www.thebradfordgroup.com>  
Maura Kelly  
847-581-8200  
mkelly@bgeltd.com  
Products: Wall hangings (including stained glass clocks, plates, etc. but does not include vinyl clings, posters or prints), jewelry (including bracelets and rings) and train and bus replicas; collectible dolls.  
Territory: U.S. and its territories and possessions, Europe, Canada, Australia and New Zealand

**Inter-Governmental Philatelic Corporation**

161 Helen Street  
South Plainfield, NJ 07080  
<http://www.igpc.net>  
Yossi Malamud  
212-629-7979  
yossi@igpc.net  
Products: Stamps, framed stamp presentation and coins  
Territory: Worldwide

**Merrick Mint**

3273 Wolfson Drive  
Baldwin, NY 11510  
<http://www.merrickmint.com>  
Darryl Abomowitz  
516-223-3000

DarrylEvan@aol.com

Products: Colorized coins and paper currency using the image of Muhammad Ali

Territory: Worldwide

**Mounted Memories**

5000 NW 108th Ave

Sunrise FL, 33351

www.mountedmemories.com

Chuck Earling

856-344-2068

cearling@dreamscorp.com

Products: Framed presentations w/ or w/out memorabilia, plaques, matted photos (unframed), display cases, event covers.

Territory: Worldwide

**Razor Entertainment Group**

10535 Sanden Drive

Dallas, TX 75238

http://www.razorcollectibles.com

Brian Gray

214-349-9690

brian@razorcollectibles.com

Products: Trading Cards

Territory: Worldwide

**Sport Kings LP**

145 Idema Road Markham

Ontario L3R 1A9, Canada

http://www.sportkingsgum.com

Dr. Brian H. Price

info@sportkingsgum.com

chris\_henderson@bellsouth.net

Products: trading cards consisting of no more than 3 distinct trading card products

Territory: Worldwide

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**Electronics**

**Vringo**

18 E. 16th St., 7th Floor

New York, NY 10003

http://www.vringo.com

Andrew Perlman

(646) 525-4319 x3501

andrew.perlman@vringo.com

Products: Video Ringtones

Territory: Malaysia and The United Arab Emirates

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**Fine Art**

**Creative Properties**

720 S. Bradford Ave

West Chester, PA 19382

http://www.creativeproperties.net

Steven Scebeto

484-889-8917

Steven.scebeto@creativeproperties.net

Products: Peter Mars to license Ali images to create original art and reproductions

Territory: Worldwide

**Iron Gut Publishing**

22 Elsworth Close

Radcliffe, Manchester, M261UJ

www.irongutpublishing.com

Anthony Marks

0044 161 848 0880

sales@irongutpublishing.com

Products: Limited edition artwork

Territory: Worldwide

**Mosaic Legends LLC**

34 West 9th Street, Second Floor.

New York, NY 10011  
<http://www.mosaiclegends.com>  
Jonathan Schweiger  
954.671.0032  
[jonathan@mosaiclegends.com](mailto:jonathan@mosaiclegends.com)  
Products: Art prints using the Photomosaic technique; i-phone app featuring the image  
Territory: Worldwide

**Obey Giant Art Inc.**  
1331 West Sunset Blvd.  
Los Angeles, CA 90026  
<http://obeygiant.com/>  
Justin McCormack  
[justin@modernpirate.com](mailto:justin@modernpirate.com)  
(310) 720-9215  
Products: Original fine art piece by Shepherd Fairey and limited edition reproductions.  
Territory: Worldwide

**Smashgraphix**  
12123 Shelbyville Rd. Suite 100-168  
Louisville, KY 40243  
<http://www.smashgraphix.com>  
Gregory Scinta  
502.419.3920  
[fgscinta@smashgraphix.com](mailto:fgscinta@smashgraphix.com)  
Products: Muhammad Ali "Through the Years" collectors print  
Territory: US Territories & Possessions, Canada

**Sony BMG Music Entertainment**  
550 Madison Ave.  
New York, NY 10022  
<http://www.iconcollectibles.com>  
Jeff Schulberg  
212-833-7253  
Products: Approved photographs of Muhammad Ali taken during recording sessions for Cassius Clay: I Am The Greatest, including for use as fine art prints and music plaques  
Territory: Worldwide

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#### Gift and Novelty

**Advanced Graphics**  
3909 Rocky Point Drive  
Antioch, California 94509  
<http://www.advancedgraphics.com>  
Craig Henderson  
(801) 499-5000  
[craig.henderson@advancedgraphics.com](mailto:craig.henderson@advancedgraphics.com)  
Products: Standups and Nomad Cling-ons (non-vinyl)  
Territory: Worldwide

**Ata Boy, Inc.**  
3171 Los Feliz Blvd., #205  
Los Angeles, CA 90039  
<http://www.ata-boy.com>  
Jude Albright  
323.644.0117 ext. 201  
[jalbright@ata-boy.com](mailto:jalbright@ata-boy.com)  
Products: Magnets, buttons & mouse pads  
Territory: US Territories & Possessions, Canada

**Culturenik**  
1903 West Main Street  
Stroudsburg PA 18360  
[www.culturenik.com](http://www.culturenik.com)  
Patrick Smith  
877-687-2579  
[licensing@culturenik.com](mailto:licensing@culturenik.com)  
Products: Magnet sets, Mugs, Bookmarks, Journals, Postcards & Postcard Sets, Jigsaw Puzzles, Special Edition prints, Keyrings, Badge Sets  
Territory: USA

**Desperate Enterprises, Inc.**  
6831 Ridge Road

Wadsworth, OH 44281  
<http://www.desperate.com>  
Dan Hutchings  
800-732-4859  
[dan@desperate.com](mailto:dan@desperate.com)  
Products: Tin signs and thermometers, light switch plates and 2"x3" magnets  
Territory: U.S., its territories and possessions and Canada. Worldwide via Internet

**Fathead, LLC**  
1046 Woodward Ave  
Detroit, MI 48226  
<http://www.fathead.com>  
Nate Partington  
734-386-5921  
[NathanPartington@Fathead.com](mailto:NathanPartington@Fathead.com)  
Products: Vinyl die-cut image made with low-tack adhesive to be used as wall décor and is 24" and above  
Territory: Worldwide

**Square One Brands**  
7700 North Hayes Drive  
Valley Center, KS 67147  
[www.squareonebrands.com](http://www.squareonebrands.com)  
Joe Hayes  
(316) 734-4200  
[joe@squareonebrands.com](mailto:joe@squareonebrands.com)  
Products: Vinyl die-cut image made with low-tack adhesive to be used as wall décor and is 24" and above  
Territory: Worldwide

**Star CutOuts**  
Unit B1, Guidebridge Trading Estate  
Ashton Under Lyne, United Kingdom OL7 0HU  
[www.starcutouts.com](http://www.starcutouts.com)  
Steve Hoagland  
1-925-595-9156  
[steven@starcutouts.com](mailto:steven@starcutouts.com)  
Products: Lifesize cardboard standees  
Territory: Worldwide

**USAopoly**  
5607 Palmer Way  
Carlsbad, CA 92010  
<http://www.usaopoly.com>  
Maggie Matthews  
760-602-7609  
[maggie@USAopoly.com](mailto:maggie@USAopoly.com)  
Products: Monopoly Game  
Territory: US and possessions, US military bases, Canada, Australia

**Vandor LLC**  
1600 South 4650 West  
Salt Lake City, UT 84119  
<http://www.vandorgifts.com>  
Stacey Dobkins  
801-972-2888 Ext 149  
[sdobkins@vandorgifts.com](mailto:sdobkins@vandorgifts.com)  
Products: Ceramic mugs, clocks, photo frames, tin/metal totes, boxes and signs, magnets, removable wall decal quotes, TV trays, fleece throws, decorative wooden boxes, glassware, coasters, pen gift sets, stationery. Business card cases  
Territory: Worldwide

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#### **Publishing and Stationary**

##### **American Greetings Corporation**

One American Road  
Cleveland, OH 44144  
<http://www.americangreetings.com>  
Julie Seligman  
216-252-7300  
[Julie.Seligman@amgreetings.com](mailto:Julie.Seligman@amgreetings.com)  
Products: Greeting cards, with or without pre-recorded sound of the voice of Muhammad Ali and Ornaments; with or without pre-recorded sound of the voice of Muhammad Ali  
Territory: U.S., its territories, possessions and military bases and Canada

**Carlton Books Ltd**  
20 Mortimer Street  
London, W1T 3JW  
United Kingdom  
<http://www.carltonbooks.co.uk>  
Matthew Lowing  
+44 20 7612 0400  
[mlowing@cpgl.co.uk](mailto:mlowing@cpgl.co.uk)  
Products: Nonfiction hardback book  
Territory: The United Kingdom of Great Britain and Northern Ireland, the Channel Islands, the Isle of Man and Ireland and throughout the world

**Danilo Promotions Ltd.**  
3 The lo Centre  
Lea Road  
Waltham Cross  
Herts, EN8 7PG  
United Kingdom  
<http://www.danilo.com>  
Trevor Jones  
44 1992 702900  
[tjones@danilo.com](mailto:tjones@danilo.com)  
Products: Greeting cards, with and without sound  
Territory: Worldwide

**DC Comics**  
1700 Broadway  
New York, NY 10019  
<http://www.dccomics.com>  
Jay Kogan  
212.636.5465  
[jay.kogan@dccomics.com](mailto:jay.kogan@dccomics.com)  
Products: Reprinting of 1978 Ali vs. Superman comic and 1 resin statue featuring Ali & Superman  
Territory: Worldwide

**Icon**  
Malvern View Business Park, Stella Way  
Bishops Cleeve, Cheltenham GL2 0LS, UK  
<http://www.icon-art.com>  
Mark Beardsley  
020 323 90475  
[mark.beardsly@icon-art.com](mailto:mark.beardsly@icon-art.com)  
Products: Greeting Cards  
Territory: Worldwide

**John Sands**  
50 Clayton Rd  
Clayton North, IVC 3168 Australia  
Jason Grant  
[jason.grant@johnsands.com.au](mailto:jason.grant@johnsands.com.au)  
61 3 9239 3500  
Products: 2012 Wall Calendar  
Territory: Australia and New Zealand

**Photo File, Inc.**  
333 N. Bedford Road Suite 130  
Mt. Kisco, NY 10549  
<http://www.photofiledirect.com>  
Chuck Singer  
914-375-6000 Ext. 115  
Products: Photos, standees, gold record  
Territory: Worldwide

**Pyramid Posters Ltd**  
The Works  
Park Road Blaby  
Leicester, LE8 4EF  
United Kingdom  
<http://www.pyramidposters.com>  
Mordy Benaliah  
+44 116 264 2624  
[Mordy.Benaliah@pyramidposters.com](mailto:Mordy.Benaliah@pyramidposters.com)  
Products: Posters, art prints, canvas prints, Photique Blockx and buttons/badges  
Territory: Worldwide

**Trends International, LLC**  
 5188 West 74th Street  
 Indianapolis, IN 46268  
<http://www.trendsinernational.com>  
 Kat Driscoll  
 317-388-4047  
[Kdriscoll@trendsinernational.com](mailto:Kdriscoll@trendsinernational.com)  
 Products: Calendar for 2010, 2011, and 2012 product years  
 Territory: U.S., its territories and possessions and Canada

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#### Sporting Goods

**Creative Creatures Inc.**  
 13460 Crestwood Place, Unit 210  
 Richmond, B.C. V6V 2J9  
 Canada  
<http://www.cctoyscustom.com>  
 Lorne Kotzer  
 888-228-5001  
[lorne@cctoyscustom.com](mailto:lorne@cctoyscustom.com)  
 Products: Golf club cover with facsimile trademarked signature of Muhammad Ali  
 Territory: Worldwide

**Everlast Worldwide, Inc.**  
 183 Madison Avenue  
 Suite 1701  
 New York, NY 10016  
<http://www.everlast.com>  
 Margaret Kivett  
 212-239-0990  
[margaret.kivett@ibmi-usa.com](mailto:margaret.kivett@ibmi-usa.com)  
 Products: Professional and retail co-branded boxing equipment and apparel  
 Territory: Worldwide

**Global Leisure Concepts**  
 8-10 Villas Rd  
 Dandenog South VIC 3175 Australia  
 David Jackson  
 61 3 9706-4475  
[david.jackson@globalleisure.com.au](mailto:david.jackson@globalleisure.com.au)  
 Products: boxing gloves, punchbag gloves, hook and jab gloves, punchbag, skipping rope, boxing kits  
 Territory: Australia and New Zealand

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#### Video Games

**Electronic Arts, Inc.**  
 209 Redwood Shores Parkway  
 Redwood City, CA 94065  
<http://www.ea.com>  
 Sandy Sandoval  
 650-628-1500  
[SSandoval@ea.com](mailto:SSandoval@ea.com)  
 Products: Interactive entertainment software products in all versions and formats excluding only wireless based entertainment software products for cellular phones  
 Territory: Worldwide

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