Assigned for all purposes to: Stanley Mosk Courthouse, Judicial Officer: Kevin Brazile

BIRD, MARELLA, BOXER, WOLPERT, NESSIM, 1 DROOKS, LINCENBERG & RHOW, P.C. Ekwan E. Rhow (State Bar No. 174604) 2 erhow@birdmarella.com 3 1875 Century Park East, 23rd Floor Los Angeles, California 90067-2561 4 Telephone: (310) 201-2100 Facsimile: (310) 201-2110 5 PRYOR CASHMAN LLP 6 Michael J. Niborski (State Bar No. 192111) mniborski@pryorcashman.com 1801 Century Park East, 24th Floor 7 Los Angeles, California 90067 8 Telephone: 310-683-6900 Facsimile: 310-943-3397 9 Brad D. Rose (pro hac vice application forthcoming) 10 brose@pryorcashman.com Dyan Finguerra-DuCharme (pro hac vice application forthcoming) 11 dfinguerra-ducharme@pryorcashman.com 7 Times Square 12 New York, New York 10706 Telephone: 212-421-4100 Los Angeles, California 90067 Telephone: (310) 683-6900 Facsimile: (310) 943-3397 13 Attorneys for Plaintiffs 14 KANYE WEST and YEEZY LLC 15 SUPERIOR COURT OF THE STATE OF CALIFORNIA 16 FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT Case No. 218TCV23514 17 18 **COMPLAINT FOR:** KANYE WEST, an individual, and YEEZY LLC, a Delaware limited liability company, 19 (1) UNFAIR COMPETITION – VIOLATION OF CAL. BUS. & PROF. Plaintiffs, 20 **CODE §§17200 ET. SEQ.**; VS. 21 **AND** WALMART INC., a Delaware corporation, and \(\) 22 (2) QUANTUM MERUIT DOES 1-10, inclusive, 23 JURY DEMAND Defendants. 24 25 26 27 28

COMPLAINT

1801 Century Park East, 24th Floor

Pryor Cashman LLP

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Plaintiffs Kanye West ("West") and Yeezy LLC ("Yeezy," and together with West, "Plaintiffs"), by and through their undersigned counsel of record, as and for their Complaint against defendant Walmart Inc. ("Walmart" or "Defendant") hereby allege as follows:

PRELIMINARY STATEMENT

- 1. This is an action for violation of California Business & Professions Code § 17200 and unjust enrichment based upon Walmart's willfully trading off the renown of Kanye West and his iconic YEEZY brand.
- West, the Grammy® Award-winning recording artist, fashion designer and 2. entrepreneur, introduced the distinctive YEEZY FOAM RUNNER footwear in 2019. Debuted by West's daughter, the YEEZY FOAM RUNNER immediately garnered significant attention in the footwear industry, becoming synonymous in the minds of consumers with West and the YEEZY brand.
- 3. Walmart is flagrantly trading off of West's and the YEEZY brand's popularity by offering for sale an imitation version of the YEEZY FOAM RUNNER:







Walmart Imitation Shoe

- 4. Consumers are purchasing the imitation YEEZY FOAM RUNNER footwear from Walmart on the mistaken belief that the shoes are associated with West and the YEEZY brand, as evidenced by comments on the Walmart website and on social media.
- 5. Walmart's conduct is harming, and will continue to harm, West and Yeezy, leaving Plaintiffs no choice but to commence the instant action to stop Walmart's unfair competition and profiting from the popularity and success of West and the YEEZY brand. The YEEZY brand is a

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

multi-billion dollar brand, and the harm caused to Plaintiffs on account of Walmart's illegal activities is, upon information and belief, potentially valued in the hundreds of millions of dollars.

PARTIES

- Kanye West is a resident of Wyoming as well as the managing member of Yeezy 6. LLC.
- 7. Yeezy LLC is a Delaware limited liability company with a principal place of business in La Palma, California.
- 8. Upon information and belief, Walmart Inc. is a Delaware corporation with a principal place of business in Bentonville, Arkansas.
- 9. Plaintiffs are ignorant of the true names and capacities of defendants sued herein as Does 1 through 10, inclusive, and therefore sues these defendants by these fictitious names. Plaintiffs will amend this Complaint to allege their true names and capacities when ascertained. Upon information and belief, each of the fictitiously named defendants is responsible in some manner for the occurrences herein alleged, and Plaintiffs' damages as herein alleged were proximately caused by their conduct.
- 10. All references to "Defendants" hereafter shall be deemed to include Walmart and Does 1-10, and each of them, unless otherwise specifically alleged.
- 11. At all times mentioned herein, Defendants are and were the alter egos of each other, in that a unity of interest exists between Defendants such that the maintenance of the separate existence between Defendants would constitute a sham and perpetration of a fraud upon the public and creditors of Defendants. As evidence of the lack of separateness of Defendants, Plaintiffs allege the following on information and belief: Defendants failed to adequately capitalize for their intended purpose or in light of their anticipated debts and obligations; Defendants failed to maintain or conduct annual meetings as required by contract or applicable law; and Defendants co-mingled funds. In light of the absence of any separate existence, Defendants are jointly and severally liable for the wrongdoing alleged herein.
- 12. At all times mentioned herein, Defendants, and each of them, were the agents, joint venturers, partners, representatives, or employees of each other and, in doing (or failing to do) the

things alleged herein, were acting within the course, purpose, and scope of their agency, joint ventures, partnerships, representations, or employment. The acts, omissions, conduct, and relationships alleged herein of each of Defendants were known to, authorized and ratified by each and every other of Defendants. It is further alleged, in the alternative, that some or each of Defendants acted at times independently of all other of Defendants to cause damage and injury to Plaintiffs.

VENUE AND JURISDICTION

- 13. This Court has personal jurisdiction over Walmart because, upon information and belief, Walmart is doing business in California, the claims at issue arise out of Walmart's acts that took place in California or were directed to consumers residing in California, and/or Walmart engaged in acts of unfair competition outside of California that caused injury to Plaintiffs in California.
 - 14. Venue is proper in this Court pursuant to Cal. Civ. Proc. Code § 395(a).

STATEMENT OF FACTS

A. Mr. Kanye West

- 15. Kanye West is an internationally renowned Grammy® Award-winning musical artist, performer, media company owner, inventor, songwriter, producer, and fashion designer. West has been described by multiple sources as one of the most acclaimed artists of the 21st century.
- 16. To date, West has released nine full-length studio albums, and has sold over 21 million albums and 100 million digital songs in the United States, making him one of the best-selling artists of all-time. West's first seven albums, all of which have gone platinum, have received numerous awards, including 21 Grammy Awards. West was ranked by *Billboard* magazine as one of the top 10 music producers of the decade and was ranked third in BET's "Top Ten Rappers of the 21st Century" list. These are just a few of the industry awards and accolades that West has earned.

17.	West's talent and notoriety is recognized around the world.	He has been named
one of the 100	O most influential people by <i>Time</i> magazine, and <i>Forbes</i> routing	nely lists West as one
of the most su	accessful people in the world.	

- 18. West operates a Twitter social media account using the "@KanyeWest" handle that is immensely popular with over 29 million followers. West commonly posts about his YEEZY products and those tweets are routinely retweeted by his followers.
- 19. West's notoriety expands well beyond music as he sets trends for everything he touches. He has launched his own clothing lines, including his highly-coveted YEEZY fashion line. West has also designed and/or developed footwear with major footwear and sneaker companies, and even designed a shoe collection for high-end fashion designer Giuseppe Zanotti.
- 20. West's massive following knows him as "YEEZY," a pseudonym that West adopted in 2009. The YEEZY name functions as a source-identifying trademark for goods and services emanating from Plaintiffs.
- 21. Few people have attained the fame achieved by West. Simply put, Kanye West is a household name, and the YEEZY brand, which has become synonymous with West, has become one of the most influential and successful brands in fashion.

B. The YEEZY Brand

- 22. Plaintiffs created the YEEZY fashion brand (a/k/a YZY) and offer footwear, apparel and bags for all genders. The YEEZY brand has been labeled one of the most influential brands in fashion, including by *Business Insider*.
- 23. Plaintiffs have sold bags, footwear and apparel bearing the YEEZY and YZY marks since at least as early as 2015.
- 24. The YEEZY brand has been credited with paving the way for some major trends in the fashion industry. The YEEZY BOOST 750 sneakers set-off a global consumer sensation, serving as the first product drop born of the collaboration between Adidas and Plaintiffs. Designed with Adidas BOOST cushioning technology, the model combines the ultimate in comfort and performance with high-end style. The YEEZY BOOST 750 was an unprecedented alliance that made history as the most significant partnership ever created between a non-athlete and an athletic

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

brand. The product redefined the future by uniting Adidas' technical, innovative expertise and capabilities with the visionary imagination of West.

- 25. As a follow-up, Plaintiffs and Adidas launched the YEEZY BOOST 350 sneaker, which went on to become one of the most sought-after and fastest-selling footwear models in history. The low-top model unites a BOOST cushioning sole and Adidas' Primeknit material with West's pioneering aesthetic. The resulting design led to a consumer frenzy, followed by unprecedented sales. The CEO of Adidas explained that "[t]he Yeezy brand has a fundamental impact on our overall brand position." In 2015, Forbes wrote that the YEEZY sneakers have arguably become "the most sought-after sneakers in pop culture next to the Jordan Brand."
- 26. GQ deemed the YEEZY Boost 350 shoes, which were first released in 2015, as the most influential sneakers of 2016. In 2015, Footwear News, the renowned fashion news source, honored West with the "Shoe of the Year" Award, acknowledging the success and cultural imprint of the YEEZY brand. In explaining its decision, Footwear News stated that "The [YEEZY] sneaker releases dominated the market in 2015, as demand for the product crashed servers, sparked extraordinary resale value, and created a need for mob control in stores." Plaintiff's YEEZY Boost 350 sneakers, priced at around \$200, sell out in just minutes, and pairs of his sneakers have resold for more than \$10,000 dollars on eBay. Forbes has praised the success of the YEEZY brand, stating the "[YEEZY] shoes have transcended the role of style accessory and shifted into the role of cultural necessity."
- 27. To offer some context in which to evaluate the relative positioning of the YEEZY brand within the fashion industry and the success of its promotional efforts, as reported by the Hollywood Reporter in 2017, according to Lyst and Business of Fashion's "Hot Brand Index," a new quarterly report compiled by the two companies that takes into account "search, page views (across devices), engagement, intent rate and conversion," GUCCI and YEEZY are the "hottest brands in the world" in luxury fashion. The Hollywood Reporter explained that "Yeezy's fire power is to be expected too, as the brand combines two of fashion's biggest trends — luxury streetwear and a celebrity creative director." According to Lyst's 2018 rankings, the YEEZY Boost 350 V2 sneakers were ranked in top 5 of the "hottest sneakers" based on "search, sales, and

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

page views combined" and YEEZY ranked in the top 5 of "hottest brands" in Q3 of 2018. According to a February 2019 article by GQ magazine, YEEZY sneakers are a "top-ten selling shoe" and have been considered "the most desirable shoe in the world." The YEEZY brand has had continuous, unprecedented success in the fashion industry since it launched.

- 28. Yeezy and its licensees have expended substantial amounts of time and have invested substantial sums in marketing and promoting YEEZY and YZY branded goods, including footwear.
- 29. Each year, the YEEZY and YZY products receive billions of impressions through its marketing campaigns and through unsolicited media attention.
- 30. Based on Plaintiffs' significant and extensive marketing campaigns, and West's worldwide marketplace success in both the entertainment industry and fashion world, the YEEZY brand has become well-known for its high quality, style, and authenticity and its close association with West.
- 31. The YEEZY brand is often the subject of widespread media attention and has been featured in prominent magazines and newspapers, including, but not limited to, The New York Times, Vogue, and GQ. Celebrities are regularly photographed wearing YEEZY clothing and footwear and using YEEZY products, which enhances the brand's popularity and appeal to the general public. Celebrities that have been photographed by the press wearing and using YEEZY products include Kim Kardashian West, Justin Bieber, Ariana Grande, Jay Z, Calvin Harris, Pharrell Williams, Snoop Dogg, Nick Jonas, Joe Jonas, Gigi Hadid, Bella Hadid, Hailey Baldwin, Karlie Kloss, Jada Pinkett Smith, Kylie Jenner and Kendall Jenner.
- 32. In 2019, Plaintiffs raised money for one of America's leading mental health charities, America's National Alliance on Mental Illness, via a series of pop-up YEEZY "lemonade stands" throughout the United States. Partnering with Adidas, Plaintiffs' 'Yeezy Stands' had people selling limited pairs of Plaintiffs' unreleased sneakers – the YEEZY Boost 700 V2 'Geode'.

C. The YEEZY FOAM RUNNER

Building on the success of the previous collaboration between West and Adidas, West and Adidas developed the unique and distinctive YEEZY FOAM RUNNER. The YEEZY FOAM

RUNNER is a slip-on shoe that employs a flexible one-piece build constructed from algae – a decision stemmed from West's commitment to producing a more sustainable product – as well as EVA Foam. It features a clog-like silhouette punctuated with cutouts of varying sizes and shapes along the sides and top of the shoe (the "YEEZY FOAM RUNNER Trade Dress"), as illustrated by the images below, depicting the YEEZY FOAM RUNNER in an array of colors:



33. The YEEZY FOAM RUNNER footwear made its official public debut on June 26, 2020, through a surprise drop exclusively on Plaintiffs' Yeezy Supply website. It retailed at \$75.00 USD and sold out instantly, and, upon information and belief, now sits at three times its initial price on the resell market.

D. Walmart's Knock-Off Foam Runner

34. Walmart is currently selling an imitation of the original and distinctive YEEZY FOAM RUNNER (the "Imitation Shoe"), which is an unauthorized exact copy of the YEEZY FOAM RUNNER in every respect, including the clog-silhouette, foam slip-on body, and

characteristic varying-sized cutouts on the sides and top of the shoe. A comparison of the YEEZY FOAM RUNNER and Walmart's Imitation Shoe illustrate that they are virtually indistinguishable:





YEEZY FOAM RUNNER

Walmart Imitation Shoe

35. In particular, both shoes feature three teardrop-shaped cutouts in decreasing size from back to front, from the heel to the middle of the shoe, with three stacked curved lines comprised of wide, short ovals over the smallest teardrop-shaped cutout along the side of the shoe, with two eye-shaped cutouts on the side of the toe, a diamond-shaped pattern of undulating lines with oval cutouts on the top of the shoe, and identically textured bottoms, as further illustrated by the below side-by-side comparison of the parties' products:



YEEZY FOAM RUNNER



YEEZY FOAM RUNNER

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28





Walmart Imitation Shoe

36. The fact that Walmart is trading off of West's and the YEEZY brand's popularity is evident from the many consumer comments on Walmart's website referencing West, the YEEZY FOAM RUNNER, and the YEEZY brand in connection with the Imitation Shoe. Representative examples are shown below:¹

Yezzy inspired nynesha, purchased on June 8, 2021 Report

Well they look like the yeezy wich cost alot more and i just want a nice comfrotable shoe and it look like it will do the job so why not

Carlos, purchased on June 4, 2021 Report

They look like the Yeezy ones ashley, purchased on June 1, 2021 Report

¹ See https://www.walmart.com/ip/Daeful-Mens-Womens-Kids-Summer-Beach-Shoes-Foam- Runner-Anti-Slipper-Sandals-Casual-Beige/226875605; https://www.walmart.com/ip/Daeful-Adult-Children-Summer-Beach-Shoes-Foam-Runner-Anti-Slipper-Sandals-Casual-Color/416297212?selected=true and https://www.walmart.com/ip/Daeful-Adult-Children-Summer-Beach-Shoes-Foam-Runner-Anti-Slipper-Sandals-Casual-Color/655015613

Cause they yeezy		
Adrian, purchased on May 29, 2021 Report		
They're budget Yeezy Foam Runners		
Edgar, purchased on May 27, 2021 Report		
Kanye vibez		
Amanda, purchased on May 26, 2021 Repo	<u>ort</u>	
Because I LOVE YEEZY		
Because I LOVE I LEZI		
Jair, purchased on June 19, 2021 Report		
My son has been wanting the yeezy s	lides but these look similar and are much	more
affordable.		
Cynthia, purchased on June 19, 2021 Rep	oort	

True and correct copies of consumer comments from the Walmart website associating the Imitation Shoe with Kanye West and the YEEZY brand are attached hereto as Exhibit A.

- 37. In fact, these consumer comments make clear that many consumers purchased the Imitation Shoe only because of its association with West and the YEEZY brand, and further, that consumers likely would have purchased the YEEZY FOAM RUNNER were it not for the cheaper knock-off Imitation Shoe. Thus, Walmart's unfair competition has caused Plaintiffs to lose market share they otherwise would have had.
- 38. The consumer comments on Walmart's own website should have alerted Walmart to the presence of an imitation good being sold on its website.

Telephone: (310) 683-6900 Facsimile: (310) 943-3397 39. Numerous posts on social media sites also indicate that many consumers mistakenly believe that the Imitation Shoe in fact emanates from West or the YEEZY brand, or that they are purchasing the Imitation Shoe solely because it is a cheap knock-off of the popular YEEZY FOAM RUNNER. Examples of such posts from Twitter are shown below:







- True and correct copies of additional social media posts associating the Imitation Shoe with Kanye West and the YEEZY brand are attached as Exhibit B.
- 40. Not only are Plaintiffs losing market share for their authentic YEEZY FOAM RUNNER, but also their reputation and the goodwill of the YEEZY brand is being harmed by the

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

association with the Imitation Shoe given its subpar quality, as evidenced by the consumer comments shown below from the Walmart website:²

```
* Bad
June 17, 2021 Verified purchase
Fit is bad and foam broke while wearing. They come off as you step and lean forward. The real ones are so
worth it for retail. Don't buy this garbage.
Helpful? Yes (0) No (0) Report
June 12, 2021 Verified purchase
Terrible do not buy quality is terrible sizing is bad idc about 20$ this is worth 20 cents
Francisco
Helpful? Yes (0) No (0) Report
* Horrible
June 2, 2021
Ripped after 20 minutes of wear
Helpful? Yes (0) No (0) | Report
* Horrible Sizing
June 10, 2021 Verified purchase
Bought a US men's size 13 and it was easily a shoe for a small child. Returned and Refunded.
William
Helpful? Yes (0) No (0) Report
June 8, 2021 Verified purchase
Careful when buying this !!!
Edward
Helpful? Yes (0) No (0) Report
```

True and correct copies of additional negative consumer reviews of the Imitation Shoe from the

Walmart website are attached hereto as Exhibit C.

² See https://www.walmart.com/ip/Daeful-Adult-Children-Summer-Beach-Shoes-Foam-Runner-Anti-Slipper-Sandals-Casual-

<u>Color/416297212?selected=true</u> and https://www.walmart.com/ip/Daeful-Adult-Children-Summer-Beach-Shoes-Foam-Runner-Anti-Slipper-Sandals-Casual-Color/655015613

2.1

- 41. In sum, Walmart's unfair competition is causing Plaintiffs economic harm in the form of diminished sales of the YEEZY FOAM RUNNER as well as harm to Plaintiffs' reputation and its property in the form of the YEEZY brand. The YEEZY brand is a multi-billion dollar brand, and the harm caused to Plaintiffs on account of Walmart's illegal activities is, upon information and belief, potentially valued in the hundreds of millions of dollars.
- 42. On June 23, 2021, counsel for Plaintiffs transmitted to Walmart a Notice of Claimed Infringement ("NOCI") demanding that Walmart immediately remove from walmart.com all of the YEEZY FOAN RUNNER Imitation Shoes available on the walmart.com platform. To date, Walmart has either failed or refused to comply with Plaintiffs' NOCI demand, constraining Plaintiffs to commence the instant action to vindicate their rights in this Court.

FIRST CAUSE OF ACTION

(Unfair Competition under California Business & Professions §§17200, et. seq.)

- 43. Plaintiffs repeat and reallege paragraphs 1 through 42 and incorporate them as though fully set forth herein.
- 44. Defendants have committed acts of unfair competition as defined by the California Business and Professions Code Sections 17200 *et seq*. (the "Unfair Competition Law") in performing the acts described herein because these practices and acts were unfair, unlawful, or fraudulent.
- 45. Defendants sold an imitation version of the popular and distinctive YEEZY FOAM RUNNER, notwithstanding comments by consumers that were or should have been sufficient to alert Walmart to the presence of imitation goods on its website. Further, Walmart traded off of the popularity and goodwill of West and the YEEZY brand in marketing, selling, and profiting from the sale of the Imitation Shoe.
- 46. In particular, but not exclusively, Defendants' conduct as set forth above was unfair within the scope of the Unfair Competition Law because it was immoral, unethical, oppressive, and/or unscrupulous in that it was designed to confuse consumers and profit off of the YEEZY brand's and Kanye West's popularity and fame.

	47.	Moreover, and also	not exclusively,	Defendants'	conduct	as set	forth	above	wa
unlawi	ful in th	at it was in violation	of applicable fee	deral and state	law, inc	luding	the L	anham	Ac
and Ca	alifornia	's False Advertising	Laws (Business	and Profession	ns Code S	Section	1750	0 et se	q.).

- 48. Additionally, Defendants' conduct as set forth above also constitutes unfair, deceptive, untrue or misleading advertising in that it intentionally confuses consumers as to the origins of the Imitation Shoe and its (non-existent) relationship to West and the YEEZY brand. In that same regard Defendants' conduct further constitutes a violation of California's "False Advertising Law," which prohibits public dissemination of any untrue or misleading advertising in connection with the sale of goods.
- 49. Defendants' unfair and unlawful conduct has directly caused economic harm to Plaintiffs, including by depriving them of market share for their authentic YEEZY FOAM RUNNER, harming the goodwill of the YEEZY brand, and otherwise diminishing the value of West's and Yeezy's present or future intellectual property interests.
- 50. In addition, California consumers have been harmed as a direct, foreseeable and proximate result of Defendants' unfair, unlawful, or fraudulent conduct, and are threatened with continued harm in the nature of, among other things, further consumer confusion.
- 51. As a consequence of Defendants' violations of California's Unfair Competition Law, Plaintiffs have been harmed and damaged in an amount to be determined at trial.
- 52. Plaintiffs seek restitution or disgorgement of Defendants' profits as well as injunctive relief enjoining Defendants, their officers, agents, and employees, and all persons acting in concert with them, from sale of the Imitation Shoe or any substantially similar product.

SECOND CAUSE OF ACTION

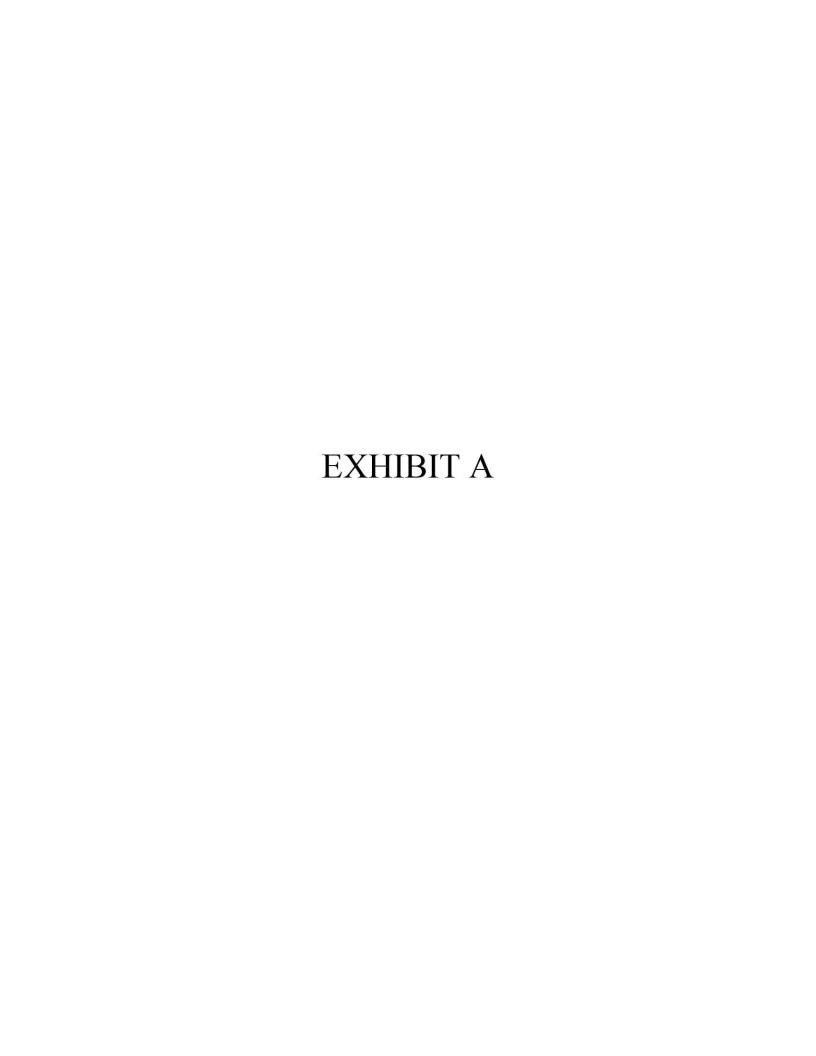
(Quantum Meruit)

- 53. Plaintiffs repeat and reallege paragraphs 1 through 52 and incorporate said paragraphs as though fully set forth herein.
- 54. By trading off of West's and the YEEZY brand's popularity and goodwill to increase sales of the Imitation Shoe, without authorization or compensation to Plaintiffs, Defendants have unjustly enriched themselves to the detriment of Plaintiffs.

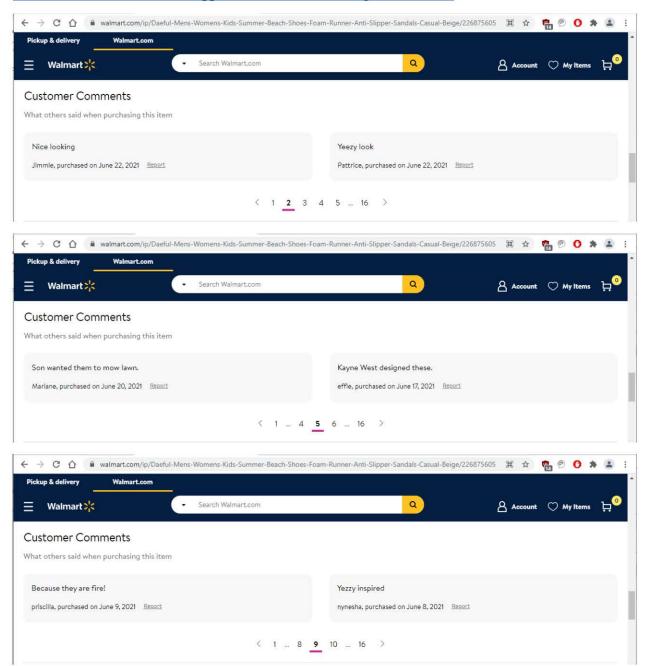
	1	55.	As a consequence	e of Def	endants' unjust enrichment, Plaintiffs seek restitution,	
	2	disgorgement of Defendants' profits, or both.				
	3	PRAYER FOR RELIEF				
Pryor Cashman LLP 1801 Century Park East, 24th Floor Los Angeles, California 90067 Telephone: (310) 683-6900 Facsimile: (310) 943-3397	4	WHE	REFORE, Plaintif	fs seek th	ne following relief:	
	5	A. Awarding money damages in an amount to be proven at trial;				
	6	B. Awarding prejudgment interest at the maximum rate allowed by the law;				
	7	C.	Enjoining Defend	ants, the	ir officers, agents, employees, and all persons acting in	
	8		concert with them	, from co	ontinuing to sell the Imitation Shoe or any substantially	
	9		similar product;			
	10	D.	Awarding the cos	ts, disbur	rsements, and expenses of this action;	
	11	E.	Awarding Plaintif	fs their a	ttorneys' fees; and	
	12	F.	For such other and	d further	relief as the Court deems just and proper.	
	13				PRYOR CASHMAN LLP	
	14					
	15	Dated: June	24, 2021	By:	mul.	
Pryor Ca Century P os Angeles, Telephone: Facsimile:	16				Ekwan E. Rhow	
P 301 Ce Los / Tela Fac	17				erhow@birdmarella.co Michael J. Niborski	
24	18				mniborski@pryorcashman.com Brad D. Rose	
	19				brose@pryorcashman.com Dyan Finguerra-DuCharme	
	20				dfinguerra-ducharme@pryorcashman.com	
	21				Attorneys for Kanye West and Yeezy LLC	
	22					
	23					
	24					
	25					
	26					
	27					
	28					
					particular description of the first transfer	

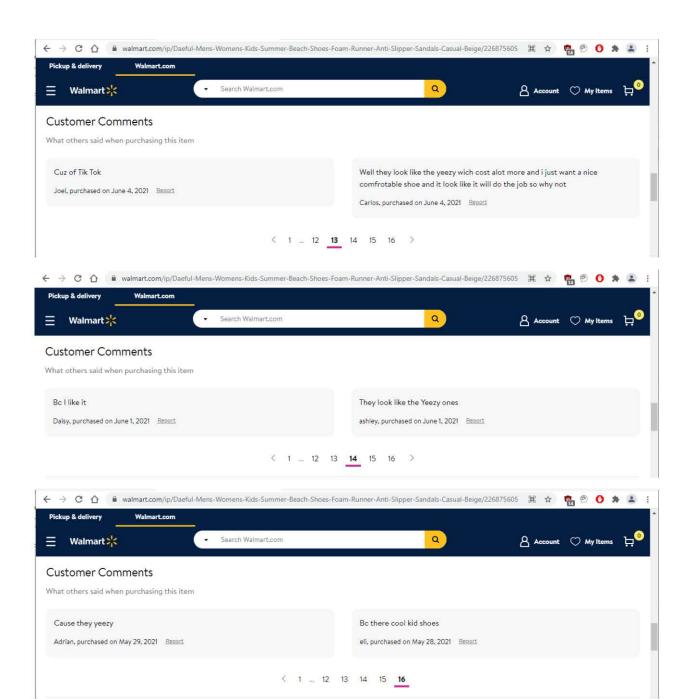
	1	DEMAND FOR JURY TRIAL			
	2	Plaintiffs hereby demand a jury trial.			
	3				
	4	PRYOR CASHMAN LLP			
	5				
	6	Dated: June 24, 2021 By:			
	7	Ekwan E. Rhow			
	8	erhow@birdmarella.co Michael J. Niborski			
	9	mniborski@pryorcashman.com Brad D. Rose			
	10	brose@pryorcashman.com Dyan Finguerra-DuCharme			
	11	dfinguerra-ducharme@pryorcashman.com			
loor 7	12	Attorneys for Kanye West and Yeezy LLC			
Pryor Cashman LLP 1801 Century Park East, 24th Floor Los Angeles California 90067	23307				
Pryor Cashman LLP century Park East, 24th Angeles California 90	Targetes, Camonna 2006 Telephone: (310) 683-6900 Facsimile: (310) 943-3397 Target 1				
Cashu y Park	le: (31)				
Pryor Ca	Telephone: Facsimile: (
1801 (3, 17				
	18				
	19				
	20				
	21				
	22				
	23				
	24				
	25				
	26 27				
	28				
	26				

COMPLAINT

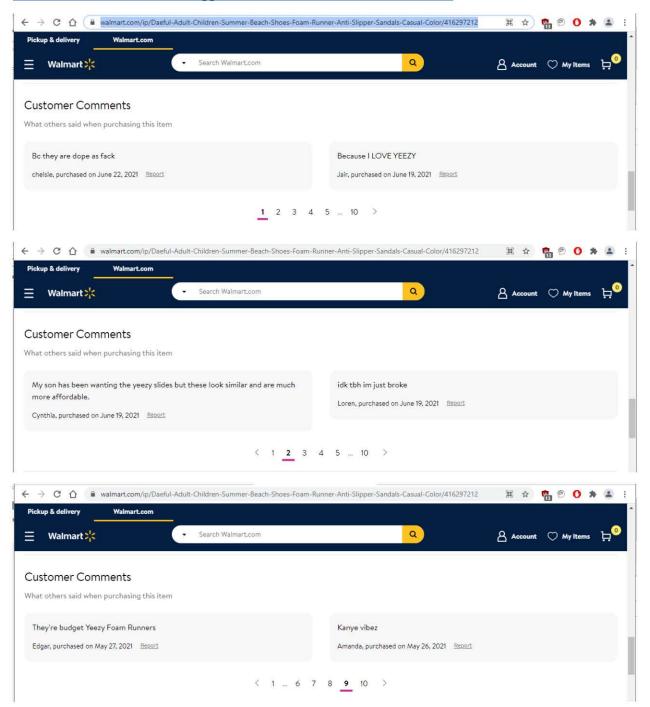


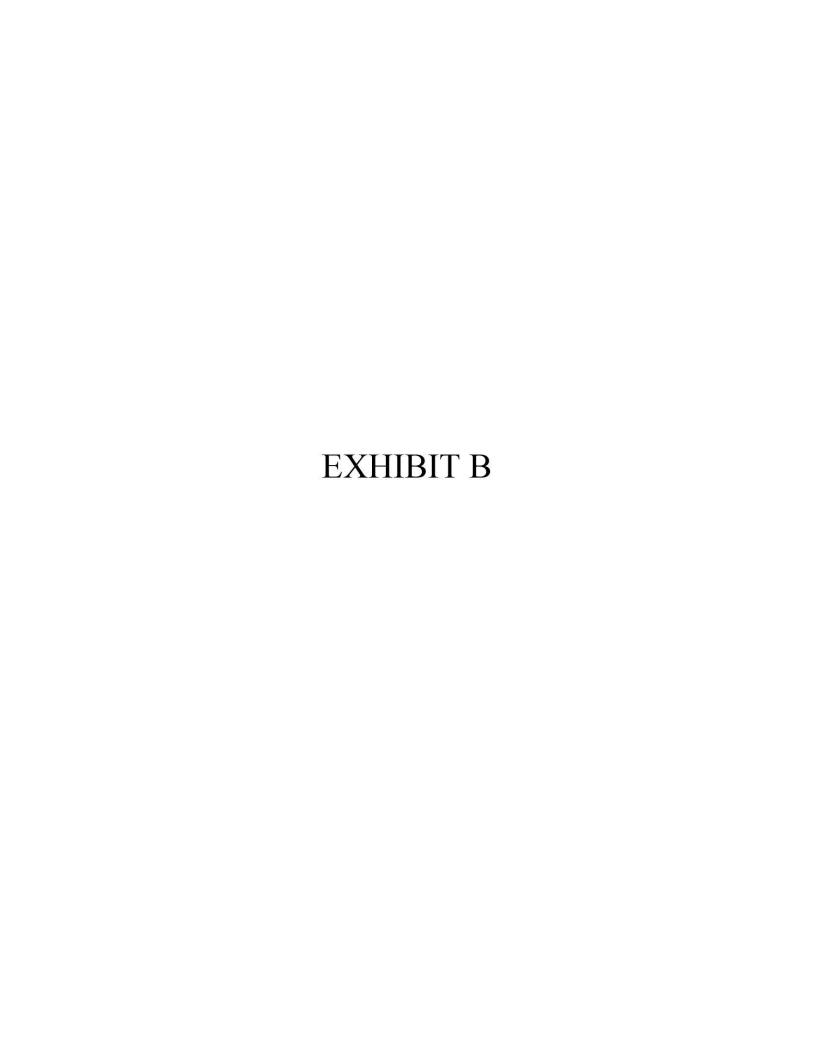
Comments from https://www.walmart.com/ip/Daeful-Mens-Womens-Kids-Summer-Beach-Shoes-Foam-Runner-Anti-Slipper-Sandals-Casual-Beige/226875605:

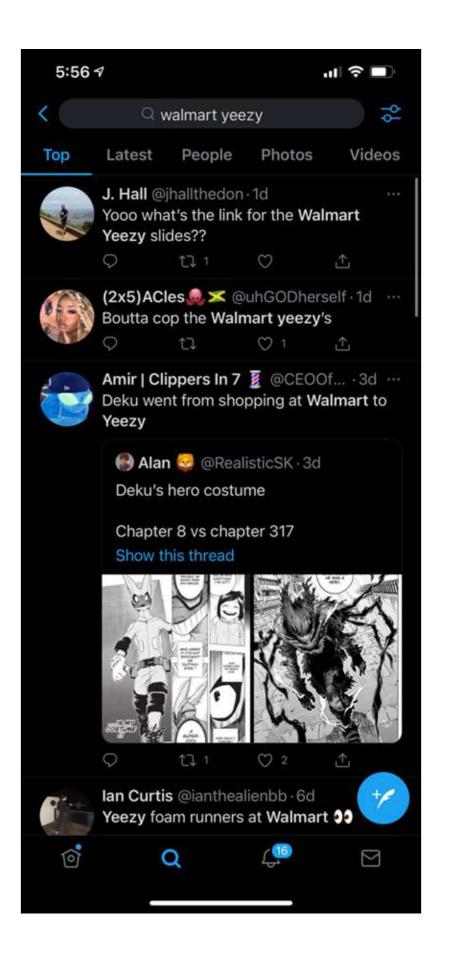


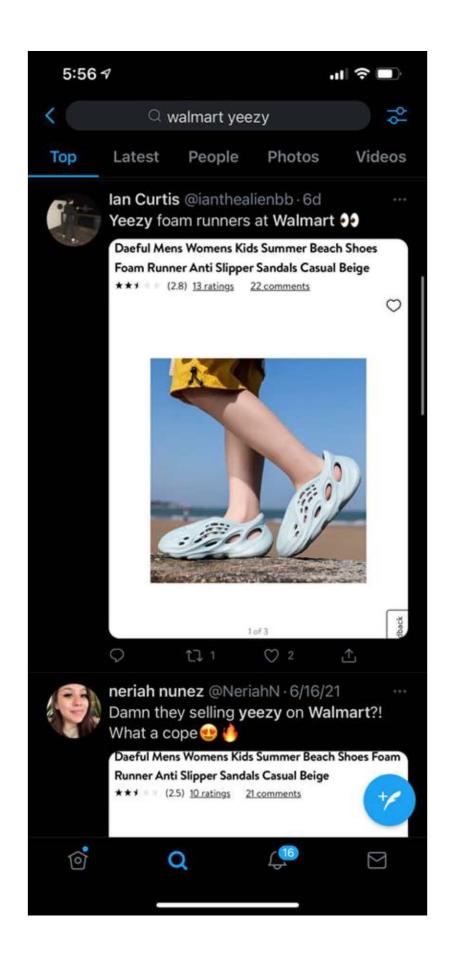


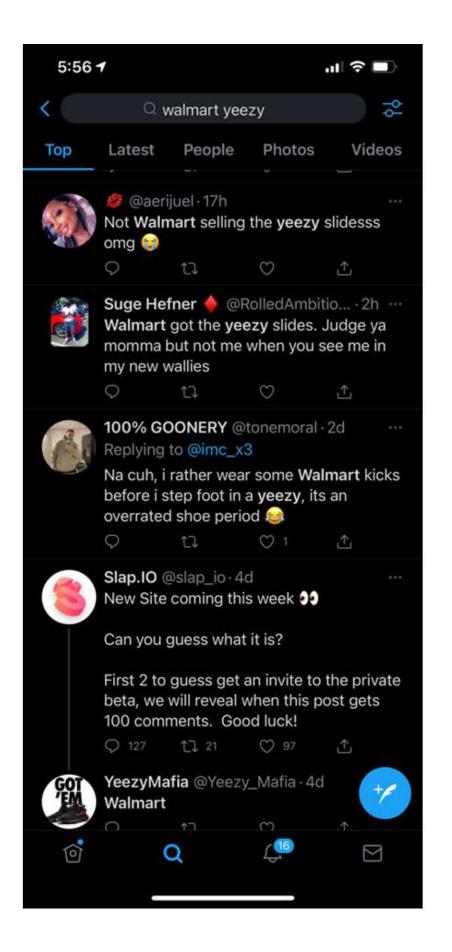
Customer comments from https://www.walmart.com/ip/Daeful-Adult-Children-Summer-Beach-Shoes-Foam-Runner-Anti-Slipper-Sandals-Casual-Color/416297212:









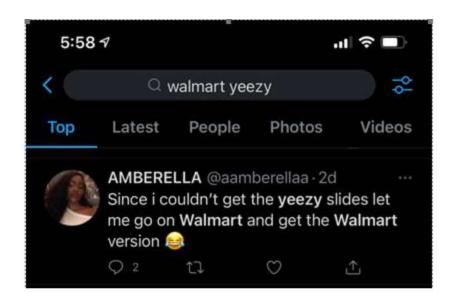


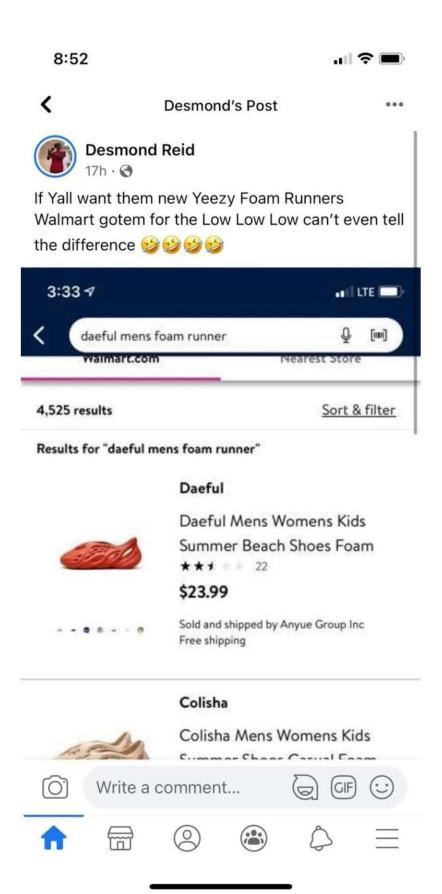




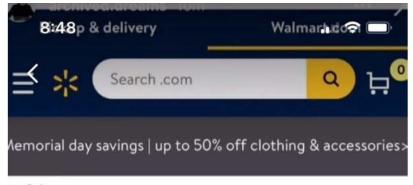










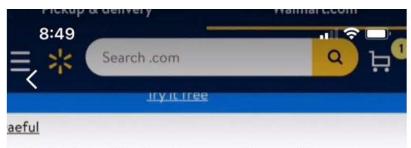


aeful

Paeful Adult Children Summer Beach Shoes Foar Runner Anti Slipper Sandals Casual Color

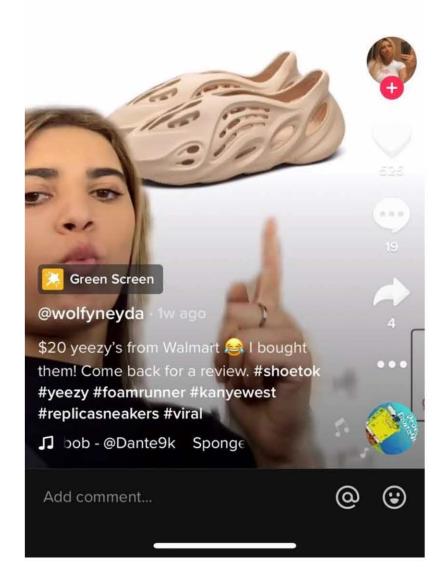
r★★★★ (5.0) <u>1 ratings</u> <u>1 comment</u>





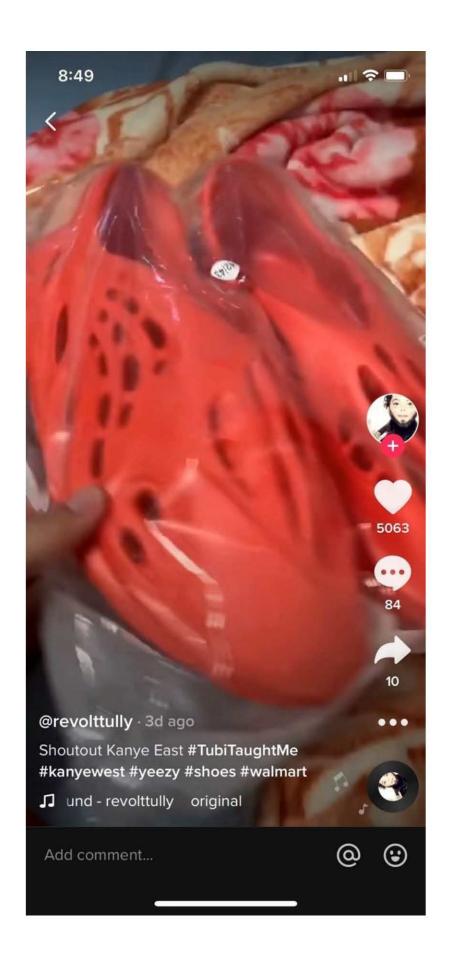
Paeful Adult Children Summer Beach Shoes Foam Runner Anti Slipper Sandals Casual Color

' WALMART IS SELLING YEEZY'S? 60





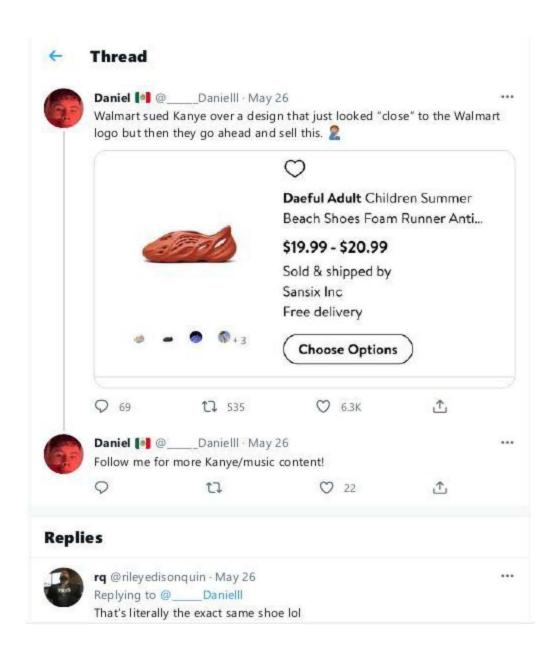


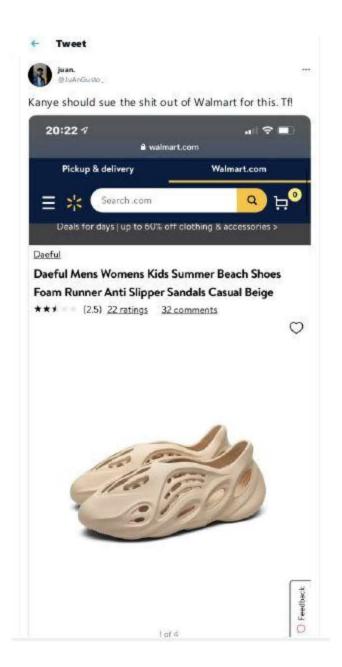






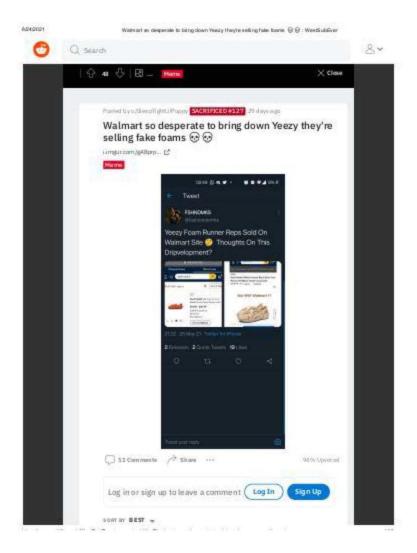


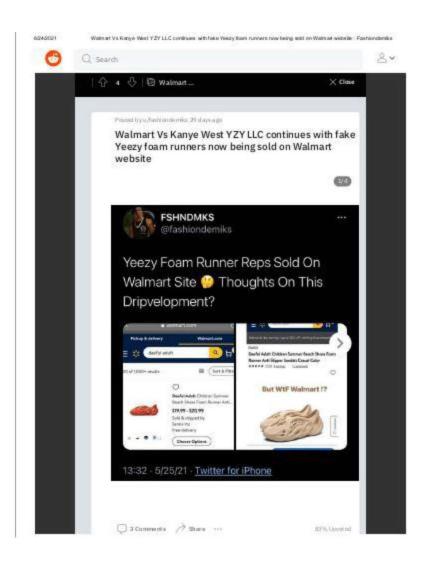














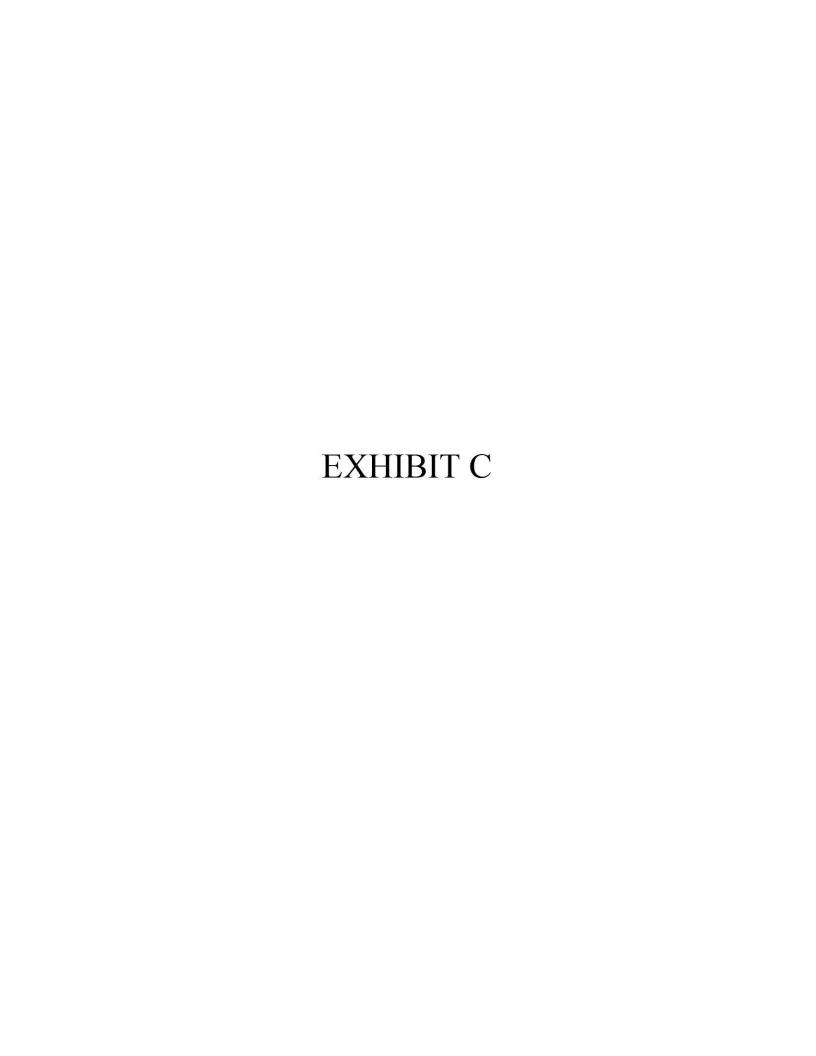


Walmart caught biting off of Kanye's Yeezy Foam Runners \bigcirc \bigcirc



1248 AM - May 27, 2021 - Twitter for iPhone

1 Quote Tweet 3 Likes





Customer reviews & ratings



Daeful Mens Womens Kids Summer Beach Shoes Foam Runner Anti Slipper Sandals Casual Beige

2.6	94%
****	Recommended
22 ratings	(17 of 18)
5 stars	7
4 stars	1
3 stars	1
2 stars	2
1 star	11

Write a review

Most helpful positive review

**** Amazing replica for the foam runners!

Sizes are accurate, material is so comfortable, looks exactly like the real deal I definitely recommend if you don't want to spend \$400 for the real pair.

See more ∨





ARREA

Terrible do not buy quality is terrible sizing is bad idc about 20\$ this is worth 20 cents

See more ∨

22 reviews

Sort by: <u>newest to oldest</u> ▼

**** Sizing is to big

June 20, 2021 Verified purchase

Sizing is to big, order a size down

Tisha

Helpful? Yes (0) No (1) Report

★★★★★ Slight purple on the inside

June 19, 2021

They look very close to the Yeezy Foam Rnners and arre a very god alternative to them they are comft etc My only complaint and its a big one is that after 1 whole day they inside (where my foot was) is turn purple so idk if its the quality or a defect in my pair but if u wanna take the risk go ahead. Now i will be buying another pair just to see if its the same and I will update you!

Likes Appearance, Fit, As a gift, Softness

Dislikes Quality

See less ^



billyrocc





vario il pavar de l'ilion parvillar

Fit is bad and foam broke while wearing. They come off as you step and lean forward. The real ones are so worth it for retail. Don't buy this garbage.

Sam

Helpful? Yes (0) No (0) Report

**** Amazing replica for the foam runners!

June 15, 2021 Verified purchase

Sizes are accurate, material is so comfortable, looks exactly like the real deal I definitely recommend if you dont want to spend \$400 for the real pair.



Nathan

Helpful? Yes (0) No (0) Report

June 12, 2021 Verified purchase

Terrible do not buy quality is terrible sizing is bad idc about 20\$ this is worth 20 cents





Francisco

Helpful? Yes (0) No (0) Report

**** Worth the price!

June 8, 2021 Verified purchase

Super comfortable and stylish! Who cares about the pricier version.

christopher

⟨ Back

varies, ses vertice perende

Look amazing u can go a half size down but it was about half and inch bigger then expected but still fit



janet

Helpful? Yes (1) No (1) Report

★★★★★ Horrible

June 2, 2021

Ripped after 20 minutes of wear

David

Helpful? Yes (0) No (0) Report

June 22, 2021 Verified purchase

chase

Helpful? Yes (0) No (0) Report

June 21, 2021 Verified purchase

Cristina

Helpful? Yes (0) No (0) Report

June 19, 2021 Verified purchase

Brooke

valle 125 man - Vertilea parellase

Tyler

Helpful? Yes (0) No (0) Report

June 17, 2021 Verified purchase

Mazen

Helpful? Yes (0) No (0) Report

June 16, 2021 Verified purchase

Shaina

Helpful? Yes (1) No (0) Report

June 16, 2021 Verified purchase

Miriam

Helpful? Yes (0) No (0) Report

June 15, 2021 Verified purchase

Joshua

Helpful? Yes (0) No (0) Report

June 15, 2021 Verified purchase

Landon



valia 173 zazi — varilian paralina

Michael

Helpful? Yes (0) No (0) Report

June 12, 2021 Verified purchase

Elaine

Helpful? Yes (0) No (0) Report

June 11, 2021

Joseph

Helpful? Yes (0) No (0) Report

1 2 >

Enter email for weekly newsletter.

Sign up

Mobile ap ☐











Walmart Services

Grocery Pickup & Delivery

Get to Know Us

Store Directory



Do Not Sell My Personal Information

Request My Personal Information

Customer Service

Terms of Use

Shop Our Brands

Allswell.



BONOBOS ELOQUIIHAYNEEDLE Mooseiaw Walmart LeBooks



Walmart * Photosam's club > Walmart +

© 2021 Walmart. All Rights Reserved.

To ensure we are able to help you as best we can, please include your reference number: WIDTNSRZCC



Customer reviews & ratings



Daeful Adult Children Summer Beach Shoes Foam Runner Anti Slipper Sandals Casual Color

2.9	91%
★★↓★★ 28 ratings	Recommended (21 of 23)
<u>5 stars</u>	11
4 stars	3
3 stars	0
2 stars	0
<u>1 star</u>	14

Write a review

Most helpful positive review

**** Overall Review

Honestly pretty good for 20 bucks , really comfortable in hand look identical to the actual foam runner

See more ∨





**** Legendarily bad sizing. Don't buy.

Ordered a US men's size 13... what I got wasn't even close to a men's size 10. Don't buy these, especially if you have a foot larger than US men's 10.

See more ∨

28 reviews Sort by: most relevant

**** Overall Review

June 17, 2021 Verified purchase

Honestly pretty good for 20 bucks , really comfortable in hand look identical to the actual foam runner yeezy



Ivan

Helpful? Yes (0) No (0) Report

★★★★★ Hottest Item On Tik Tok

June 4, 2021 Verified purchase

COMFORTABLE



Jovanny





Julio 17, 202

I bought this without reading the reviews, so I was nervous that they would show up super small. Not only did they come before the expected time, but they were the correct size. I've been wearing them most of the day. They feel pretty good. Just ensure that you choose the correct size for adults, and I don't think you should have a problem.

Brycen

Helpful? Yes (0) No (0) Report

**** Nice but not perfect.

June 12, 2021 Verified purchase

Solid, color could more closely emulate the real shoes if it wanted it to.

Amritpal

Helpful? Yes (0) No (0) Report

**** Yeezy Foam Runner Knock Offs

June 19, 2021 Verified purchase

I liked them. Not the best replicas Ive seen, but its the best you're gonna get for 25 bucks.

Nate

Helpful? Yes (0) No (0) Report

**** Legendarily bad sizing. Don't buy.

June 4, 2021 Verified purchase

Ordered a US men's size 13... what I got wasn't even close to a men's size 10. Don't buy these, especially if you have a foot larger than US men's 10.



Ben



Dario 10, 2021 Vollition paraticas

Bought a US men's size 13 and it was easily a shoe for a small child. Returned and Refunded.

William

Helpful? Yes (0) No (0) Report

**** DO NOT BUY

June 12, 2021 Verified purchase

Do not buy!! I am begging you please do not buy. I was sent a packet of balloons.

amber

Helpful? Yes (0) No (0) Report

June 8, 2021 Verified purchase

Careful when buying this !!!

Edward

Helpful? Yes (0) No (0) Report

June 10, 2021

Order a size 12 and got like a size 2 in kids

eddie

Helpful? Yes (0) No (0) Report

**** Read before you buy lol

June 15, 2021

Lol everyone whos saying I bought a 13 and doesn't fit cant read cause it clearly says 13Y

Khuram



Order like a size 10 men but is a lil too big but they ok

Francisco

Helpful? Yes (0) No (0) Report

June 16, 2021 Verified purchase

Christina

Helpful? Yes (0) No (0) Report

June 18, 2021 Verified purchase

Brayan

Helpful? Yes (0) No (0) Report

June 16, 2021 Verified purchase

Reiss

Helpful? Yes (0) No (0) Report

May 28, 2021

Christian

Helpful? Yes (0) No (0) Report

May 27, 2021

woroud



...uy -0, -0-

diego

Helpful? Yes (0) No (0) Report

May 22, 2021

Pinkk

Helpful? Yes (3) No (10) Report

June 12, 2021 Verified purchase

amber

Helpful? Yes (0) No (0) Report

1 2 >

Enter email for weekly newsletter.

Sign up

Mobile ap











Walmart Services

Grocery Pickup & Delivery

Get to Know Us

Store Directory



Do Not Sell My Personal Information

Request My Personal Information

Customer Service

Terms of Use

Shop Our Brands

Allswell.



BONOBOS E L O Q U I I HAYNEEDLE Moosejaw Walmart CeBooks



Walmart * Photosam's club > Walmart +

© 2021 Walmart. All Rights Reserved.

To ensure we are able to help you as best we can, please include your reference number: WIDTNSRZCC



Customer reviews & ratings



Daeful Adult Children Summer Beach Shoes Foam Runner Anti Slipper Sandals Casual Color

2.9	91%
★★↓★★ 28 ratings	Recommended (21 of 23)
<u>5 stars</u>	11
4 stars	3
3 stars	0
2 stars	0
<u>1 star</u>	14

Write a review

Most helpful positive review

**** Overall Review

Honestly pretty good for 20 bucks , really comfortable in hand look identical to the actual foam runner

See more ∨





**** Legendarily bad sizing. Don't buy.

Ordered a US men's size 13... what I got wasn't even close to a men's size 10. Don't buy these, especially if you have a foot larger than US men's 10.

See more ∨

28 reviews Sort by: newest to oldest

May 28, 2021 Verified purchase

Jazzi

Helpful? Yes (0) No (0) Report

May 28, 2021

Christian

Helpful? Yes (0) No (0) Report

May 28, 2021

diego

Helpful? Yes (0) No (0) Report

May 27, 2021

woroud



...uy = 1, = u=

jo

Helpful? Yes (0) No (1) Report

May 27, 2021

lsh

Helpful? Yes (0) No (1) Report

May 27, 2021

Mohammad

Helpful? Yes (0) No (1) Report

May 22, 2021

Pinkk

Helpful? Yes (3) No (10) Report

< 1 2

Enter email for weekly newsletter.

Sign up















Get to Know Us

Store Directory

Privacy & Security

CA Privacy Rights

Do Not Sell My Personal Information

Request My Personal Information

Customer Service

Terms of Use

Shop Our Brands





BONOBOS ELOQUIIHAYNEEDLE Mooseiaw Walmart : CeBooks





Walmart * Photosam's club > Walmart +

© 2021 Walmart. All Rights Reserved.

To ensure we are able to help you as best we can, please include your reference number: WIDTNSRZCC