

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

	:	Civil Action No. 3:25-cv-00676
LEGO A/S, LEGO Systems, Inc.,	:	
and LEGO Holding A/S,	:	
	:	
	:	
Plaintiffs,	:	JURY TRIAL DEMANDED
	:	
v.	:	
	:	
Veux Toys, LLC,	:	
	:	
Defendant.	:	APRIL 29, 2025

COMPLAINT

Plaintiffs LEGO A/S (“LAS”), LEGO Systems, Inc. (“LSI”), and LEGO Holding A/S formerly known as LEGO Juris A/S (“LHAS”) (collectively, the “LEGO Group”) file this Complaint against Defendant Veux Toys, LLC (“Veux”) and allege as follows:

THE PARTIES

1. Plaintiff LAS is a private company with a place of business located at Aastvej 1, Dk-7190, Billund, Denmark.
2. Plaintiff LSI is a Delaware corporation having its principal place of business at 100 Print Shop Road, P.O. Box 1600, Enfield, Connecticut 06082.
3. Plaintiff LHAS is a private company with a place of business located at Koldingvej 2, Dk-7190, Billund, Denmark.
4. The LEGO Group is a world-renowned toy maker and sells numerous products under the LEGO® trademark, including construction toy sets and the famous Minifigure figurine. The LEGO Group owns federal copyright and trademark registrations that protect the sculpture of the LEGO® Minifigure figurine, and prohibit third parties from selling, or offering for sale,

figurines that are substantially or confusingly similar to the Minifigure figurine. The LEGO Group also owns numerous U.S. design patents that protect the design of individual construction elements.

5. Upon information and belief, Defendant Veux is a California limited liability company with a principal place of business located at 1968 S Coast Hwy 1337, Laguna Beach, California 92651.

6. Upon information and belief, Defendant Veux is a manufacturer and/or seller of toys, including figurines that are substantially and confusingly similar to the LEGO® Minifigure figurine, and construction elements that are substantially similar to the LEGO Group's U.S. design patents, as described herein.

7. Upon information and belief, Veux does business in the State of Connecticut, including shipping, selling, offering for sale, and/or promoting the products at issue in this Complaint (among other products) in this District.

JURISDICTION AND VENUE

8. This Court has jurisdiction over the subject matter of this Complaint pursuant to 28 U.S.C. §§ 1331, 1338(a) and (b), and 1367.

9. This Court has personal jurisdiction over Veux by virtue of it transacting, doing, and soliciting business in this District, and committing acts of patent, copyright, and trademark infringement in this District.

10. Venue is proper in this District because Veux is a foreign limited liability company and has committed acts of patent, copyright, and trademark infringement in this District, including shipping, selling, offering for sale, and/or promoting the products at issue in this Complaint (among other products) in this District.

FACTS

A. The LEGO Group Is a World-Renowned Toy Maker, Known for Quality Products

11. The LEGO® brand is one of the world's most powerful and beloved brands.

12. The LEGO Group is a well-established industry innovator and leader in designing and manufacturing toys and play materials for children of all ages, and adults, worldwide.

13. The LEGO Group's toy building elements, figurines and toy sets helped establish the construction toy category, are well-recognized around the world, and have enjoyed tremendous commercial success and consistent popular acclaim. Constructive LEGO® play fosters positive, lifelong skills, such as creativity, imagination and creative problem solving, which are valuable to children and adults of all ages.

14. The LEGO Group is known for delivering the very best construction toy products and associated play experiences. In fact, the name "LEGO" is an abbreviation of the Danish words "leg godt" meaning "play well."

15. The LEGO Group was founded in 1932 by Ole Kirk Kristiansen, who started the company making wooden toys and selling them from his workshop in Billund, Denmark. The company has passed from parent to child with Thomas Kirk Kristiansen, great grandchild of the founder, representing the fourth generation of ownership. Ole Kristiansen's motto—"det bedste er ikke for godt" meaning "only the best is good enough"—helps explain why the LEGO Group's products have been named "Toy of the Century" by both *Fortune* magazine and the British Association of Toy Retailers.

16. Over the years, the LEGO Group has amassed significant goodwill and a strong reputation for quality. Indeed, the LEGO Group and the LEGO® brand have received numerous accolades in recent years, including, *inter alia*, the LEGO Group's recognition as the #1 Most

Reputable Global Company (Reprtrack; 2020, 2021, 2023, and 2024) and Global Toy Manufacturer of the Year for 2024 (Circana; Toy Industry Performance Awards), and the LEGO® brand's recognition as the Most Loved Brand of 2020 (Talkwalker) and the #1 Most Popular Kids Entertainment Brand (Brand Trends; 2021). Time Magazine included the LEGO Group on its list of TIME100 Most Influential Companies of 2021.

17. The LEGO Group's innovative and commercially successful products are the result of its long-time investment in research and development and commitment to cutting-edge toy designs. The LEGO Group's innovations and products have become so popular and well-recognized that they attract competitors who attempt to capitalize on the LEGO Group's success by copying its innovations and products instead of developing their own product lines.

18. Over the years, the LEGO Group has made substantial investments in design, research and development, licensing, and manufacturing in a wide variety of product lines, including those containing the Minifigure figurine and big figurine construction toy products shown in the chart below:



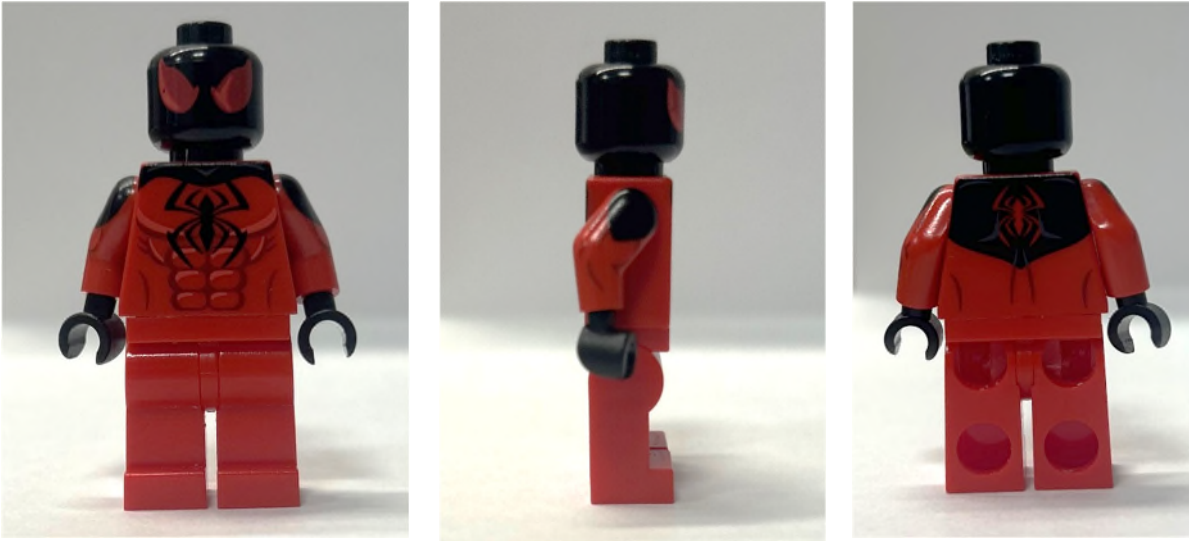


Representative LEGO® Products

19. As described in further detail *infra*, Veux is infringing the LEGO Group’s intellectual property rights by selling, and offering for sale in the U.S., many of its products, including but not limited to its Military Vehicle Building Blocks Set, Rick and Morty Inspired Custom Minifigure, Marvel’s Into the Spider-Verse Custom Minifigure Set, and Marvel Superhero Korg Minifigure/BigFIG from Thor Ragnarok, as well as various posters (collectively, the “Infringing Products”).

B. The LEGO Group’s Intellectual Property Rights in the LEGO® Minifigure Figurine

20. In 1978, the LEGO Group introduced its Minifigure figurine. For nearly 50 years, the Minifigure figurine has been sold worldwide in numerous varieties of LEGO® brand toy sets, as well as individually, becoming one of the most iconic toys for the LEGO Group. Hundreds of millions of Minifigure figurines have been sold in the United States since 1978.



A Representative LEGO® Minifigure figurine

21. LAS owns numerous copyrights registered with the United States Copyright Office, including Registration Number VA0000655230 and Registration Number VA0000655104 (the “Minifigure Copyrights”), which protect the three-dimensional (3D) sculpture of the Minifigure figurine and derivative works. Copies of the deposit material maintained by the United States Copyright Office as part of the Minifigure Copyrights are attached as **Exhibit A** and **Exhibit B**.



Registration Number VA0000655230



Registration Number VA0000655104

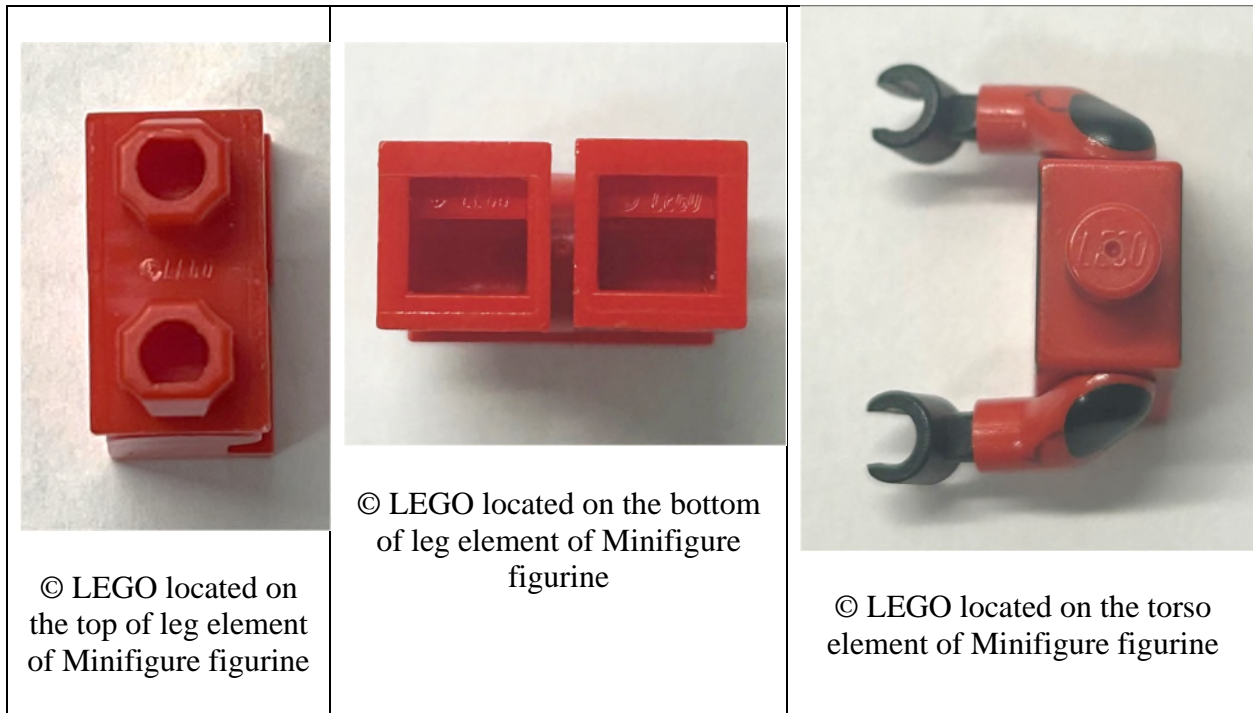
22. Since 1978, the LEGO Group has continuously displayed the © symbol in connection with the Minifigure figurine on various product packaging, catalogs and instructions.

23. Since at least as early as 1993, the LEGO Group has continuously displayed the © symbol in the plastic of the Minifigure figurine in various locations.

24. Since at least as early as 1998, the LEGO Group has continuously displayed “© LEGO” in the plastic of the Minifigure figurine in various locations. For example, in the images below, “© LEGO” is in the plastic of each element comprising the Minifigure figurine:



© LEGO located inside head element of Minifigure figurine



25. LHAS owns numerous trademarks registered with the United States Patent & Trademark Office, including Registration Number 4,903,968 for the Minifigure figurine. A copy of the Registration Certificate for the Registered Minifigure Trademark, along with the updated ownership information filed with the United States Patent and Trademark Office, is attached as **Exhibit C.**



USPTO Registration Number 4,903,968

26. The LEGO Group also has common law trademark rights in the Minifigure figurine set forth in Exhibit C, by virtue of its continuous use of the mark in commerce throughout the United States since 1978 (together with the Registered Minifigure Trademark, the “Minifigure Trademark”).

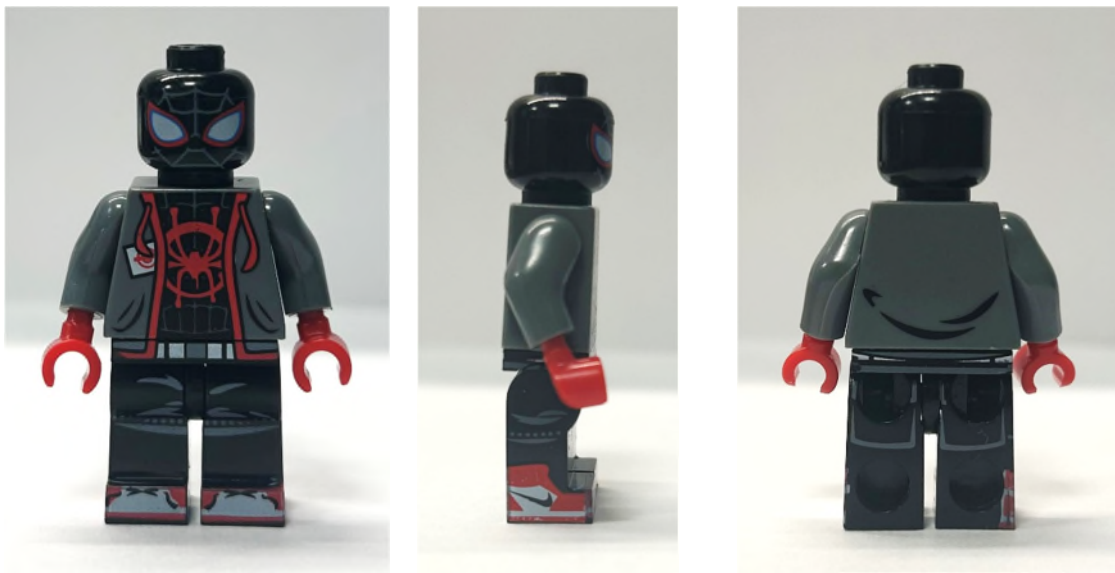
27. The LEGO Group has established valuable (indeed, *invaluable*) trademark rights and goodwill in the Minifigure Trademark by virtue of its long use and registration of the trademarks, the substantial promotional and marketing efforts under the trademark, the expenditure of vast sums in advertising and promotional activities under the trademark, and third-party licensing agreements.

28. The products and services offered, sold, and advertised in connection with the Minifigure Trademark have generated substantial revenue. Such revenue has exceeded over one billion dollars (USD) internationally.

29. As a result of the long and extensive use of the Minifigure Trademark, and the significant sales, promotion, advertising, third-party licensing, and commercial success under that mark, the Minifigure figurine has achieved such widespread public exposure and recognition that it is distinctive, well-known, and famous among the general consuming public here and abroad.

C. Veux’s Infringing Figurines

30. Veux sells figurines (the “Infringing Figurines”), both individually and as part of certain toy sets, that are confusingly, strikingly and substantially similar to the overall look and feel of the LEGO® Minifigure figurine, including but not limited to the (a) Rick and Morty Inspired Custom Minifigure, (b) Marvel’s Into the Spider-Verse Custom Minifigure Set, (c) Mandalorian Season 3 Building Set with 13 Minifigures building set, and (d) Military Vehicle with 6 Custom Minifigures Building Blocks Set, depicted below.

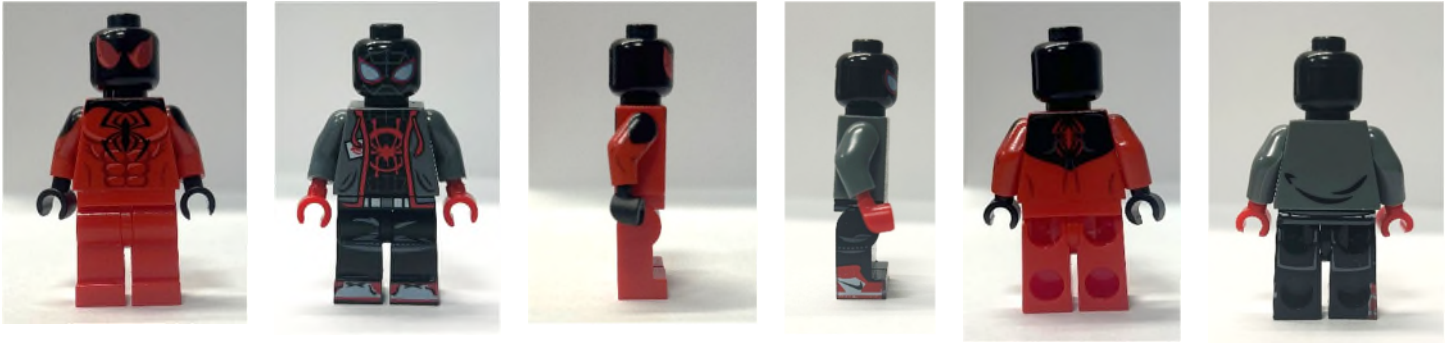


Representative Veux Infringing Figurine



Example Play Sets Containing Veux Infringing Figurines

31. The images below show alternating, different views of the copyrighted and trademarked LEGO® Minifigure figurine and a Veux Infringing Figurine:



Comparison of LEGO® Minifigure figurine and Veux Infringing Figurine



Comparison of a LEGO® Minifigure figurine set (LEFT) and a Veux Infringing Figurine set (RIGHT)



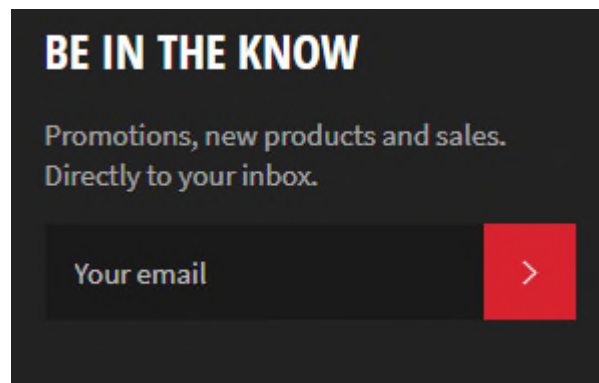
Alternating LEGO® Minifigure figurines and Veux Infringing Figurines

32. The Infringing Figurines are advertised and offered for sale on Veux’s interactive website, www.veuxtoys.com (the “Veux Website”).

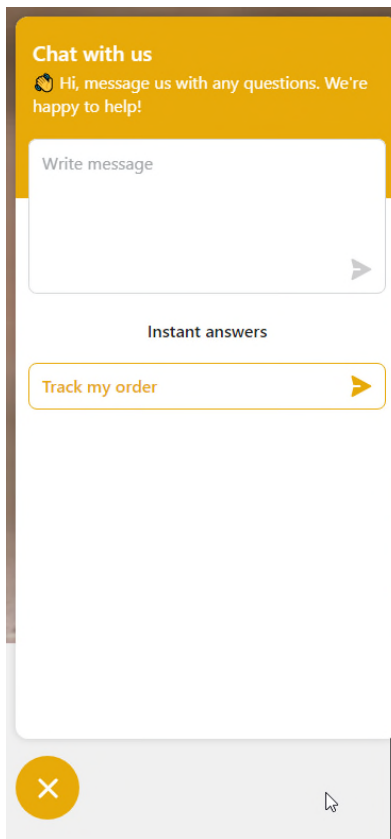
33. Customers are able to view and interact with the Veux Website in Connecticut and can order products to be shipped into Connecticut.

34. Veux ships products, including the Infringing Products, into Connecticut.

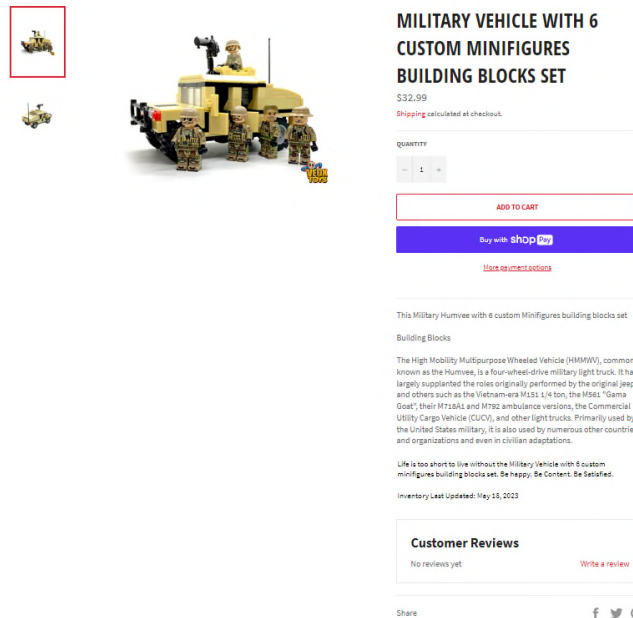
35. The Veux Website contains several other interactive elements including a “Chat with us” option, an option to sign up for Veux e-mails, options to share a product to social media, links to Veux’s social media pages, including Facebook, Pinterest, Instagram, and Snapchat, a page where a user can send a message, and an option to track a shipment.



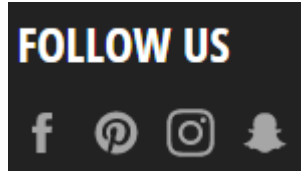
Option to Sign-Up for E-Mails on Veux Website



“Chat with us” option on Veux Website



Example Option to Share Products to Social Media on Veux Website



Links to Social Media Pages on Veux Website

Name	Email
Phone Number	
Message	
SEND	

Contact Page for Users to Submit Messages on Veux Website



Enter a tracking number, and get tracking results.

Tracking Number	 Track
-----------------	---



[Terms](#) [Privacy](#)

Option to Track Shipments on Veux Website

36. Veux's Infringing Figurines are unauthorized reproductions of the LEGO Group's Minifigure figurine, and infringe its copyrights and trademarks including the Minifigure Copyrights and Minifigure Trademark.

37. The toy market is highly competitive. Selling products that infringe the LEGO Group's copyrights and trademarks will allow Veux to increase its market share and sales, and enable Veux to establish relationships with customers, and licensors potentially, for whom the LEGO Group competes. That potential injury to the LEGO Group is unquantifiable.

38. The LEGO Group has no agreement of any kind with Veux that would authorize the manufacture or sale of the Infringing Figurines. The Infringing Figurines are sold through some of the same trade channels as the LEGO® Minifigure figurine, including Walmart.com.

D. Veux's Infringing Images and Videos

39. The Veux Website, social media accounts, packaging, and third-party retail accounts prominently display cartoon images (the "Infringing Images") that are confusingly and substantially similar to the overall look and feel of the Minifigure figurine. Examples of the Infringing Images on the Veux Website are shown below:



Infringing Images on the Veux Website

40. Veux also offers for sale and sells a line of posters which prominently display the Infringing Images (the “Infringing Posters”). An example of an Infringing Poster displaying an Infringing Image is shown below:



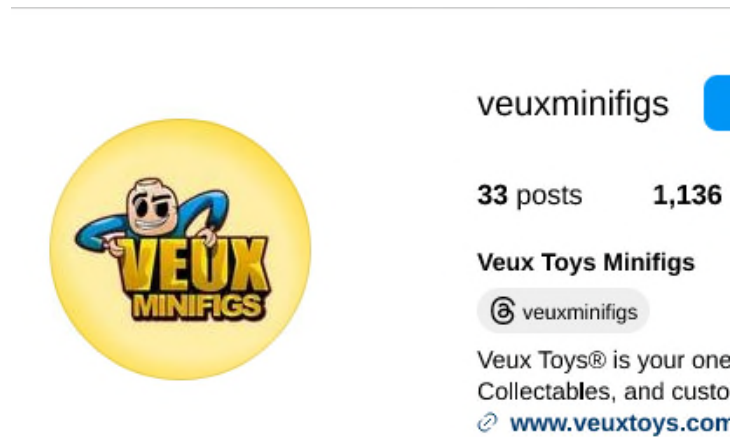
Image of an Infringing Poster Sold by Veux

41. Veux also uses animated videos featuring figurines that are confusingly and substantially similar to the LEGO Minifigure figurine to advertise and promote Veux’s Infringing Products (the “Infringing Videos”) and publishes the Infringing Videos to at least its Instagram Account (@veuxminifigs). A screenshot of an exemplary Infringing Video is shown below:



Image of Infringing Video on Veux’s Instagram Account

42. Veux also uses an Infringing Image as a source identifier in its logo (the “Infringing Logo”).



Infringing Logo

43. Veux’s Infringing Images, Infringing Videos, and Infringing Logo are unauthorized reproductions of the LEGO Group’s copyrights and trademarks including the Minifigure Copyrights and Minifigure Trademark.

44. Veux’s Infringing Images, Infringing Videos, and Infringing Logo are likely to tarnish and impair the distinctiveness of the famous Minifigure Trademark by causing consumers to associate the Infringing Images, Infringing Videos, and Infringing Logo with the LEGO Group.

45. The LEGO Group has no agreement of any kind with Veux that would authorize the manufacture, sale, or use of the Infringing Products, Infringing Images, Infringing Videos, or Infringing Logo.

E. The LEGO Group’s Big Figurine Copyrights

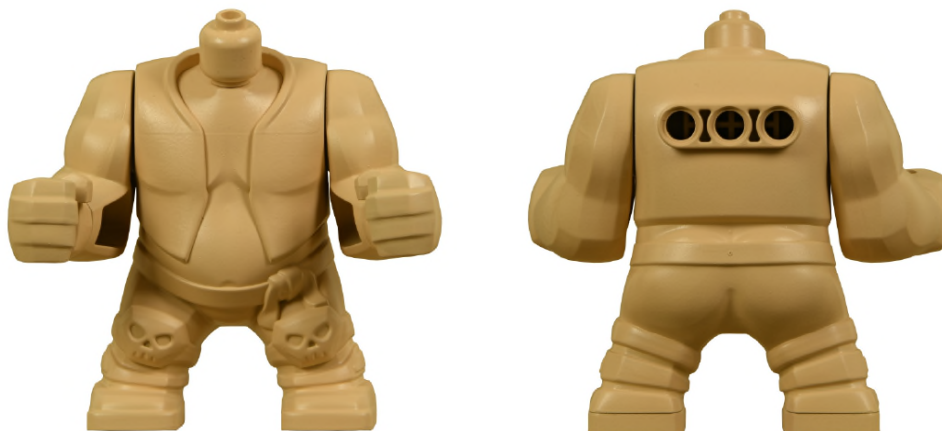
46. LAS owns numerous copyrights registered with the United States Copyright Office, including Registration Numbers VA0002204856 and VA0002204848 (the “Big Figurine

Copyrights”), protecting the 3D sculpture and derivative works of the LEGO Group’s big figurine. Copies of the registrations for the Big Figurine Copyrights are attached as **Exhibits D** and **E**.

47. Images of the deposit material for the Big Figurine Copyrights are shown below:



Registration Number VA0002204856: Dogshank (FRONT and REAR)



Registration Number VA0002204848: Killow (FRONT and REAR)

48. The LEGO Group’s big figurine has been sold in numerous varieties of LEGO® brand toy sets, and the LEGO Group has undertaken substantial promotional, advertising, and

marketing efforts related to the big figurine over the years. The big figurine has, therefore, become an important part of the play value of LEGO® brand sets.

F. Veux's Infringement of the Big Figurine Copyrights

49. Veux sells figurines individually, such as the Marvel Superhero Korg Minifigure/BigFIG from Thor Ragnarok, and as part of sets, including but not limited to its Avengers Endgame Custom Minifigure Set of 13PC set, that are confusingly, strikingly and substantially similar to the overall look and feel of the LEGO Group's big figurine (the "Infringing Big Figures").



Representative Veux Infringing Big Figure



Comparison of Infringing Big Figure (LEFT) and LEGO® Big Figurine (RIGHT)

50. The Infringing Big Figures are advertised and available for purchase on the interactive Veux Website.

51. Veux's Infringing Big Figures are unauthorized reproductions of the LEGO Group's big figurines, infringing its Big Figurine Copyrights.

52. The LEGO Group has no agreement of any kind with Veux that would authorize the manufacture or sale of the Infringing Big Figures.

G. The LEGO Group's Design Patents

53. The LEGO Group is famous throughout the world for its construction toy products. Over the course of more than 50 years, the LEGO Group has designed and sold thousands of different unique bricks and toy building elements. The ornamental designs of many of its toy building elements are protected by United States design patents.

54. LAS owns U.S. Patent No. D695,851 (the "851 Patent"), U.S. Patent No. D701,924 (the "924 Patent"), and D652,087 (the "087 Patent") (collectively the "Asserted Patents"). Each of the Asserted Patents remains in full force and effect.

55. The '851 Patent, entitled "Building Block From A Toy Building Set," was duly and legally issued on December 17, 2013 to LAS as assignee. A copy of the '851 Patent is attached hereto as **Exhibit F**.

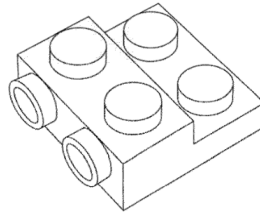


FIG. 1

Figure 1 of the '851 Patent

56. The '924 Patent, entitled "Building Block From A Toy Building Set," was duly and legally issued on April 1, 2014 to LAS as assignee. A copy of the '924 Patent is attached hereto as **Exhibit G**.

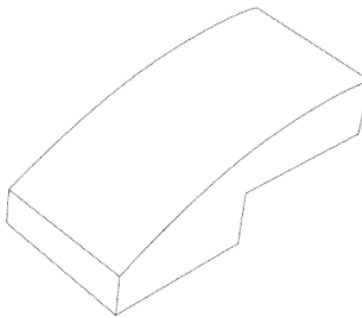


Image 1 of the '924 Patent

57. The '087 Patent, entitled “Toy Construction Set Element,” was duly and legally issued on January 10, 2012 to LAS as assignee. A copy of the '087 Patent is attached hereto as

Exhibit H.

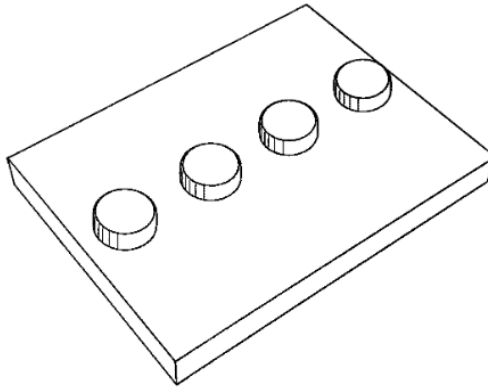


FIG. 1

Figure 1 of the '087 Patent

H. Veux's Infringing Elements

58. Upon information and belief, Veux manufactures, sells, offers for sale, and imports, in the United States certain building bricks that are substantially similar to the Asserted Patents (the “Infringing Elements”).

59. Veux makes, offers to sell, sells, and imports Infringing Elements that are identical to the '851 Patent in at least set No. 607045. A claim chart for the '851 Patent is attached as **Exhibit I.** A chart providing an exemplary drawing from the '851 Patent and an image of an

Infringing Element (top) compared to an image of a genuine LEGO® brick embodying the '851 patent (bottom) is provided below:

Exemplary Drawing from '851 Patent

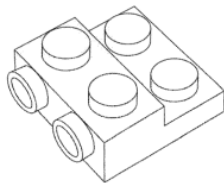


FIG. 1

Comparison of Elements



60. Veux makes, offers to sell, sells, and imports Infringing Elements that are identical to the '924 Patent in at least set No. 607045. A claim chart for the '924 Patent is attached hereto as **Exhibit J**. A chart providing an exemplary drawing from the '924 Patent and an image of an Infringing Element (top) compared to an image of a genuine LEGO® brick embodying the '924 Patent (bottom) is provided below:

Exemplary Drawing from '924 Patent

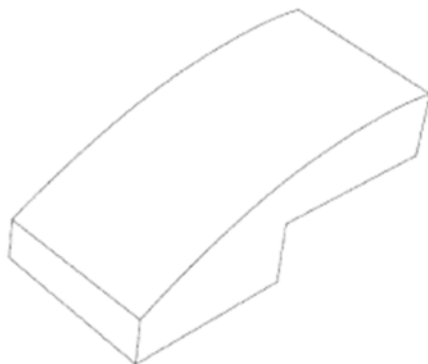
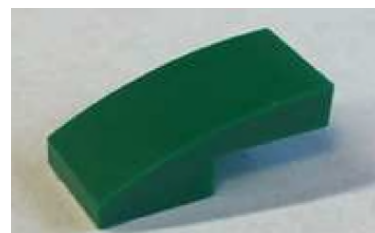


FIG. 7

Comparison of Elements



61. Veux makes, offers to sell, sells, and imports Infringing Elements that are identical to the '087 Patent in at least the Rick and Morty Inspired Custom Minifigure, Military Vehicle Building Blocks Set, and Marvel's Into the Spider-Verse Custom Minifigure Set. A claim chart for the '087 Patent is attached hereto as **Exhibit K**. A chart providing an exemplary drawing from the '087 Patent and an image of an Infringing Element (top) compared to an image of a genuine LEGO® brick embodying the '087 Patent (bottom) is provided below.

Exemplary Drawing from '087 Patent

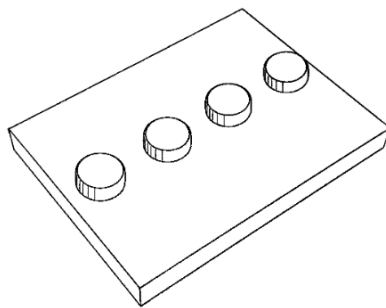


FIG. 1

Comparison of Elements



62. The LEGO Group has no agreement of any kind with Veux that would authorize the manufacture, sale, offer for sale, or importation of the Infringing Elements.

63. The LEGO Group sent a correspondence to Veux on April 14, 2023 demanding it cease and desist all current and future display, use, manufacture, distribution, and sale of the Infringing Products, Infringing Images and Infringing Logo.

64. On May 4, 2023, the LEGO Group sent a follow-up correspondence to Veux.

65. On September 1, 2023, the LEGO Group sent a follow-up correspondence to Veux, including a draft version of this complaint.

66. On December 8, 2023, counsel for the LEGO Group sent a follow-up correspondence to Veux regarding its infringing activity.

67. To date, Veux has not responded to the LEGO Group's correspondence.

68. Upon information and belief, on at least April 14 and April 16, 2023, Veux advertised new Infringing Products on its Instagram account.

69. Upon information and belief, Veux started posting the Infringing Videos on its Instagram account on or about April 8, 2024, after the LEGO Group's correspondence.

COUNT I
(Copyright Infringement of Minifigure Copyright)

1-45. The LEGO Group hereby repeats and realleges paragraphs 1 through 45 of this Complaint as if fully set forth herein.

63-69. The LEGO Group hereby repeats and realleges paragraphs 63 through 69 of this Complaint as if fully set forth herein.

70. The copyrighted Minifigure figurine is an original work of authorship that is copyrightable subject matter under the copyright laws of the United States, 17 U.S.C. §§ 101, *et seq.* The LEGO Group has complied in all respects with the laws governing copyright and has secured the rights and privileges in, to, and under the Minifigure Copyrights in the Minifigure figurine.

71. In violation of the LEGO Group's exclusive rights in the Minifigure figurine and the Minifigure Copyrights, Veux has displayed and sold, and continues to: (a) sell and offer for sale Infringing Figurines that are strikingly and substantially similar to the overall look and feel of the Minifigure figurine, (b) sell and offer for sale Infringing Posters that contain images of

figurines that are strikingly and substantially similar to the overall look and feel of the Minifigure figurine, and (c) publish Infringing Images and Infringing Videos that contain images of figurines that are strikingly and substantially similar to the overall look and feel of the Minifigure figurine, for the purpose of marketing, advertising, promoting and offering for sale the Infringing Products.

72. Veux's unlawful conduct constitutes infringement of the LEGO Group's exclusive rights in the Minifigure Copyrights, including without limitation the LEGO Group's rights under 17 U.S.C. § 106.

73. Upon information and belief, as a direct and proximate result of Veux's wrongful conduct, Veux has realized and continues to realize profits and other benefits rightfully belonging to the LEGO Group.

74. As a result of Veux's unlawful conduct, the LEGO Group has suffered and will continue to suffer damages.

75. The LEGO Group has suffered and will continue to suffer irreparable harm from Veux's infringing acts, unless Veux's infringement is enjoined.

COUNT II
(Trademark Infringement Under Section 32(a) of the Lanham Act, 15 U.S.C. § 1114(a))

1-45. The LEGO Group hereby repeats and realleges paragraphs 1 through 45 of this Complaint as if fully set forth herein.

63-69. The LEGO Group hereby repeats and realleges paragraphs 63 through 69 of this Complaint as if fully set forth herein.

76. Without the LEGO Group's consent, Veux used and continues to use in commerce the Infringing Figurines, Infringing Images, Infringing Videos, and Infringing Logo as described above, in connection with the offer for sale, sale, and advertising of toy figures and construction

toy products, which are likely to cause confusion, or to cause mistake, or to deceive in violation of Section 32(a) of the Lanham Act, 15 U.S.C. § 1114(a).

77. Upon information and belief, the actions of Veux described above have at all times relevant to this action been willful.

78. As a direct and proximate result of the actions of Veux alleged above, the LEGO Group has been damaged and will continue to be damaged.

79. The LEGO Group has suffered and will continue to suffer irreparable harm from Veux's infringing acts, unless Veux's infringement is enjoined.

COUNT III
(Trademark Infringement, False Designation of Origin, and Unfair Competition Under
Section 43(a)(1)(A) of the Lanham Act, 15 U.S.C. § 1125(a)(1)(A))

1-45. The LEGO Group hereby repeats and realleges paragraphs 1 through 45 of this Complaint as if fully set forth herein.

63-69. The LEGO Group hereby repeats and realleges paragraphs 63 through 69 of this Complaint as if fully set forth herein.

76-79. The LEGO Group hereby repeats and realleges paragraphs 76 through 79 of this Complaint as if fully set forth herein.

80. The actions of Veux relating to the Infringing Figurines, Infringing Images, Infringing Videos, Infringing Logo, and Infringing Posters are likely to cause confusion, mistake, or deception as to the origin, sponsorship, affiliation, or approval of the products and services and commercial activities of Veux, and thus constitute trademark infringement, false designation of origin, and unfair competition in violation of Section 43(a)(1)(A) of the Lanham Act, 15 U.S.C. § 1125(a)(1)(A).

81. Upon information and belief, the actions of Veux described above have at all times relevant to this action been willful.

82. As a direct and proximate result of the actions of Veux alleged above, the LEGO Group has been damaged and will continue to be damaged.

83. The LEGO Group has suffered and will continue to suffer irreparable harm from Veux's infringing acts, unless Veux's infringement is enjoined.

COUNT IV
(Trademark Dilution, 15 U.S.C. § 1125(c))

1-45. The LEGO Group hereby repeats and realleges paragraphs 1 through 45 of this Complaint as if fully set forth herein.

63-69. The LEGO Group hereby repeats and realleges paragraphs 63 through 69 of this Complaint as if fully set forth herein.

84. Based on at least the duration and extent of use of the Minifigure Trademark, the duration, extent, and geographic reach of advertising featuring the Minifigure Trademark, the Minifigure Trademark registration, and the degree of public recognition of the Minifigure Trademark, the Minifigure Trademark is famous and distinctive within the meaning of Section 43(C) of the Lanham Act, 15 U.S.C. § 1125(c).

85. The Minifigure Trademark became distinctive and famous prior to Veux's actions described above.

86. Veux's Infringing Figurines, Infringing Images, Infringing Videos, and Infringing Logo are so similar to the famous Minifigure Trademark that they have impaired or are likely to impair the distinctiveness of the Minifigure Trademark in the minds of consumers.

87. Upon information and belief, Veux intended to create an association in the minds of consumers between its products and the LEGO Group.

88. Veux's Infringing Figurines, Infringing Images, Infringing Videos, and Infringing Logo thereby dilute or are likely to dilute the distinctiveness of the famous Minifigure Trademark by lessening its ability to serve as a source identifier for the LEGO Group, in violation of Section 43(c)(2)(B) of the Lanham Act, 15 U.S.C. § 1125(c)(2)(B).

89. Upon information and belief, the actions of Veux described above have at all times relevant to this action been willful.

90. As a direct and proximate result of the actions of Veux alleged above, the LEGO Group has been damaged and will continue to be damaged.

91. The LEGO Group has suffered and will continue to suffer irreparable harm from Veux's infringing acts, unless Veux's infringement is enjoined.

COUNT V

(Common Law Trademark Infringement, Unfair Competition, and Misappropriation)

1-45. The LEGO Group hereby repeats and realleges paragraphs 1 through 45 of this Complaint as if fully set forth herein.

63-69. The LEGO Group hereby repeats and realleges paragraphs 63 through 69 of this Complaint as if fully set forth herein.

76-91. The LEGO Group hereby repeats and realleges paragraphs 76 through 91 of this Complaint as if fully set forth herein.

92. Veux's actions described above, including its manufacture, sale, offer for sale, display and distribution of the Infringing Products, Infringing Images, and Infringing Logo, and its use of the Infringing Videos to promote its products, constitute common law trademark

infringement, unfair competition, and misappropriation of the LEGO Group's goodwill under the common law of Connecticut and other states.

93. Veux's actions described above, including its unauthorized use of the LEGO Trademark in connection with the marketing, promotion, and offering for sale of the Infringing Posters constitute common law trademark infringement, unfair competition, and misappropriation of the LEGO Group's goodwill under the common law of Connecticut and other states.

94. Upon information and belief, the actions of Veux described above have at all times relevant to this action been willful.

95. As a direct and proximate result of the actions of Veux alleged above, the LEGO Group has been damaged and will continue to be damaged.

96. The LEGO Group has suffered and will continue to suffer irreparable harm from Veux's infringing acts, unless Veux's infringement is enjoined.

COUNT VI
(Copyright Infringement of Big Figurines)

1-19. The LEGO Group hereby repeats and realleges paragraphs 1 through 19 of this Complaint as if fully set forth herein.

46-52. The LEGO Group hereby repeats and realleges paragraphs 46 through 52 of this Complaint as if fully set forth herein.

63-69. The LEGO Group hereby repeats and realleges paragraphs 63 through 69 of this Complaint as if fully set forth herein.

97. The LEGO Group's big figurine comprises a wholly original work of authorship that is copyrightable subject matter under the copyright laws of the United States, 17 U.S.C. §§ 101, *et seq.* The LEGO Group has complied in all respects with the laws governing copyright

and has secured the rights and privileges in, to, and under the Big Figurine Copyrights in the big figurine.

98. In violation of the LEGO Group's exclusive rights in its big figurine and the Big Figurine Copyrights, Veux has sold, and continues to sell, Infringing Big Figures that are strikingly and substantially similar to the overall look and feel of the big figurine.

99. Veux's unlawful conduct constitutes infringement of the LEGO Group's exclusive rights in the Big Figurine Copyrights, including without limitation the LEGO Group's rights under 17 U.S.C. § 106.

100. Upon information and belief, as a direct and proximate result of Veux's wrongful conduct, Veux has realized and continues to realize profits and other benefits rightfully belonging to the LEGO Group.

101. As a result of Veux's unlawful conduct, the LEGO Group has suffered and will continue to suffer damages.

102. The LEGO Group has suffered and will continue to suffer irreparable harm from Veux's infringing acts, unless Veux's infringement is enjoined.

COUNT VII
(Infringement of Asserted Patents Under 35 U.S.C. §§ 271 and 289)

1-19. The LEGO Group hereby repeats and realleges paragraphs 1 through 19 of this Complaint as if fully set forth herein.

53-62. The LEGO Group hereby repeats and realleges paragraphs 53 through 62 of this Complaint as if fully set forth herein.

63-69. The LEGO Group hereby repeats and realleges paragraphs 63 through 69 of this Complaint as if fully set forth herein.

103. Upon information and belief, Veux has been and presently is infringing the Asserted Patents within this judicial district and elsewhere by making, using, offering to sell, selling, and importing Infringing Elements that embody the patented designs disclosed in the Asserted Patents.

104. Veux's Infringing Elements so closely resemble the Asserted Patents that an ordinary observer would be deceived into purchasing the above-referenced Veux toy sets.

105. Veux's Infringing Elements infringe the Asserted Patents in violation of 35 U.S.C. §§ 271 and 289.

106. Upon information and belief, Veux's infringement of the Asserted Patents is and has been willful.

107. The LEGO Group is entitled to recover damages adequate to compensate it for Veux's infringement.

108. The LEGO Group has suffered and will continue to suffer irreparable harm from Veux's infringing acts, unless Veux's infringement is enjoined.

COUNT VIII
(Violation of the Connecticut Unfair Trade Practices Act)

1-108. The LEGO Group hereby repeats and realleges paragraphs 1 through 108 of this Complaint as if fully set forth herein.

109. By engaging in the acts alleged above, Veux has willfully and maliciously engaged in conduct offensive to public policy, governing statutes, common law principles, and established concepts of fairness.

110. Veux's willful and malicious conduct was and is immoral, unethical, oppressive, and unscrupulous.

111. Veux's conduct has caused and will continue to cause substantial injury to the LEGO Group and to the public interest.

112. Veux committed such acts, and continues to commit such acts, in the conduct of trade or commerce.

113. The LEGO Group has suffered, and if Veux is not enjoined will continue to suffer, an ascertainable loss of money or property as a result of Veux's actions.

114. By virtue of the conduct above, Veux has engaged in unfair competition and unfair or deceptive acts or practices in the conduct of trade or commerce in violation of the Connecticut Unfair Trade Practices Act, Conn. Gen. Stat. § 42-110a, *et seq.*

PRAYER FOR RELIEF

WHEREFORE, the LEGO Group requests judgment in its favor against Veux as follows:

1. A judgment that Veux has infringed the Minifigure Copyrights;
2. A judgment that Veux has infringed the Minifigure Trademark;
3. A judgment that Veux has infringed the LEGO Group's common law trademark rights in the Minifigure Trademark;
4. A judgment that Veux has infringed the Big Figurine Copyrights;
5. A judgment that Veux has engaged in unfair competition, and unfair and/or deceptive trade practices, under the Connecticut Unfair Trade Practices Act, Conn. Gen. Stat. § 42-110a, *et seq.*;
6. A judgment that Veux has infringed the Asserted Patents;
7. For a permanent injunction restraining Veux, its employees, and all persons in active concert or participation with Veux or with any of the foregoing from:

- a. manufacturing, selling, offering for sale, displaying or authorizing the sale of products, including the Infringing Products, containing unauthorized reproductions of the copyrighted and trademarked Minifigure figurine and copyrighted big figurine, including any figurine or image that is substantially similar to the Minifigure Copyrights or Big Figurine Copyrights or likely to be confused with the Minifigure Trademark; and
- b. manufacturing, selling, offering for sale, or authorizing the sale of construction toy elements that are substantially similar to the Asserted Patents, including in the Infringing Products, or applying the patent design or any colorable imitation thereof to any article of manufacture for the purpose of sale;

8. An order that Veux be directed to file with this Court and serve on the LEGO Group within thirty days after the service of an injunction, a report, in writing and under oath, confirming all copies of the Infringing Products and Infringing Elements and means for copying the same, have been destroyed;

9. Awarding the LEGO Group its actual damages and Veux's profits in an amount to be determined at trial or statutory damages pursuant to 17 U.S.C. § 504, 35 U.S.C. § 284, and 15 U.S.C. § 1117 and other applicable laws;

10. Awarding the LEGO Group its reasonable attorney's fees and costs; and

11. Such other and further relief as the Court deems appropriate.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, the LEGO Group demands trial by jury in this action of all issues triable by jury in this matter.

Respectfully submitted,

/s/ Andraya P. Brunau

Elizabeth A. Alquist (ct15643)

Andraya P. Brunau (ct29715)

Juliana M. Campochiaro (ct31405)

Caitlin M. Barrett (ct31379)

DAY PITNEY LLP

Goodwin Square

225 Asylum Street

Hartford, CT 06103

Phone (860) 275-0100

Fax (860) 275-0343

eaalquist@daypitney.com

abrunau@daypitney.com

jcampochiaro@daypitney.com

cbarrett@daypitney.com

Attorneys for Plaintiffs

LEGO A/S, LEGO Systems, Inc., and

LEGO Holding A/S