

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PEARSON EDUCATION, INC., :
JOHN WILEY & SONS, INC., :
CENGAGE LEARNING INC. AND :
THE MCGRAW-HILL COMPANIES, INC., :

Plaintiffs,

-against-

07 Civ. 07890 (PKC)

MATTHEW STIRLING D/B/A :
THETEXTBOOKGUY.COM :
AND JOHN DOES NOS. 1-5 :

Defendants.

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AMENDED COMPLAINT

Plaintiffs Pearson Education, Inc. ("Pearson"), John Wiley & Sons, Inc. ("Wiley"), Cengage Learning Inc. ("Cengage") and The McGraw-Hill Companies, Inc. ("McGraw-Hill"), by their undersigned attorneys, for their amended complaint against defendants Matthew Stirling d/b/a thetextbookguy.com and John Doe Nos. 1 through 5, aver:

Nature of the Action

1. Plaintiffs are bringing this action to enforce their copyrights and trademarks against defendants' unlawful sale in the United States of non-United States versions of plaintiffs' educational books.

Jurisdiction and Venue

2. This Court has subject matter jurisdiction over the first two claims in this action pursuant to 28 U.S.C. §§ 1331 and 1338 because they arise under the Copyright Act, 17 U.S.C. § 101 et seq., or the Lanham Act, 15 U.S.C. § 1051 et seq. This Court has subject matter jurisdiction over the third claim in this action pursuant to 28 U.S.C. § 1367 because it is so related to the claims within the original jurisdiction of this Court that they form part of the same case or controversy within the meaning of Article III of the United States Constitution.

3. Upon information and belief, venue is proper in this District pursuant to 28 U.S.C. § 1391.

Parties

4. Pearson is a corporation organized and existing under the laws of Delaware with its principal place of business at One Lake Street, Upper Saddle River, New Jersey 07458.

5. Wiley is a corporation organized and existing under the laws of the State of New York with its principal place of business at 111 River Street, Hoboken, New Jersey 07030.

6. Cengage is a corporation organized and existing under the laws of Delaware with its principal place of business at 200 First Stamford Place, 4th Floor, Stamford, Connecticut 06902.

7. McGraw-Hill is a corporation organized and existing under the laws of the State of New York with its principal place of business at 1221 Avenue of the Americas, New York, New York 10020.

8. Upon information and belief, defendant Matthew Stirling d/b/a thetextbookguy.com resides at 902 W. 13th Street, Tempe, AZ 85281.

9. Upon information and belief, defendants John Doe Nos. 1-5 are associates of Matthew Stirling d/b/a the textbookguy.com whose identities are presently unknown to plaintiffs.

The Businesses of Plaintiffs

10. Each plaintiff publishes a variety of works, including educational books.

11. As a standard practice, each plaintiff requires its authors to assign the copyright to them or grant them the exclusive rights of reproduction and distribution in the United States. This practice enables each plaintiff to maximize dissemination of each work.

12. Plaintiffs invest significant monies to publish their copyrighted works. Plaintiffs, for example, make substantial investments in royalties, content creation, licensing, copyediting, proofreading, typesetting, layout, printing, binding, distribution, and promotion.

13. Plaintiffs earn a substantial portion of their revenue from the publication of their copyrighted works and would suffer serious financial injury if their copyrights were not enforced. A substantial decline in their income could cause plaintiffs to cease publishing one or more deserving books or journals. This would adversely impact the creation of new works, scholarly endeavor, and scientific progress.

14. Plaintiffs' educational books authorized for sale in the United States are of the highest quality (the "United States Editions"). These books are generally printed with strong, hard-cover bindings with glossy protective coatings and, in some cases, contain extra features such as sewn ribbon bookmarks. Plaintiffs frequently offer academic supplements, such as CD-ROMs, computer passwords that provide purchasers with access to academic websites corresponding to the textbooks, and study guides with the United States Editions.

15. Plaintiffs generally create different versions of their educational books that are intended for sale in specific geographic markets outside of the United States (the "Foreign Editions"). The Foreign Editions materially differ from the United States Editions. The Foreign Editions have thinner paper and different bindings, different cover and jacket designs, fewer internal ink colors, if any, lower quality photographs and graphics, and generally lower prices than the United States

Editions. Also, the Foreign Editions often lack academic supplements, such as CD-ROMs, website passwords, or study guides. The Foreign Editions are generally marked to indicate their lower cost by a legend indicating, in substance, that the title is a "Low Price Edition" and/or authorized for sale only in a particular country or geographic region. The Foreign Editions are uniformly manufactured outside of the United States.

Plaintiffs' Copyrights and Trademarks

16. Plaintiffs routinely register their copyrights. Pearson has registered the works identified on Schedule A (the "Pearson Copyrights"). Wiley has registered the works identified on Schedule B (the "Wiley Copyrights"). Cengage has registered the works identified on Schedule C (the "Cengage Copyrights"). McGraw-Hill has registered the works identified on Schedule D (the "McGraw-Hill Copyrights").

17. Pearson PLC, Pearson's ultimate parent company, is the owner of and Pearson is an exclusive licensee of, with the accompanying right and duty to protect and enforce Pearson PLC's rights therein, the well-known trademarks "Pearson," "Pearson Education" and "Prentice Hall." Pearson Education, Inc. is the direct holder of the well-known trademark "Benjamin Cummings." Pearson's affiliate corporation Addison Wesley Longman, Inc. is the owner of, and Pearson is the exclusive

licensee of, with the accompanying right and duty to protect and enforce its and its affiliate company's rights therein, the well known trademarks "Addison Wesley" or "Addison-Wesley" (the "Pearson Trademarks"). The United States Registrations for the Pearson Trademarks are identified on Schedule E.

18. Among Wiley's well-known trademarks are "John Wiley & Sons," "Wiley," and the "John Wiley Colophon" (the "Wiley Trademarks"). The United States Registrations for the Wiley Trademarks are identified on Schedule F.

19. Among Cengage's well-known trademarks are "Thomson Learning" (the "Cengage Trademarks"). The United States Registrations for the Cengage Trademarks are identified on Schedule G.

20. Among McGraw-Hill's well-known trademarks are "McGraw-Hill," "The McGraw-Hill Companies" and "Irwin" (the "McGraw-Hill Trademarks"). The United States Registrations for the McGraw-Hill Trademarks are identified on Schedule H.

The Infringing Acts of Defendants

21. Defendants have without permission purchased Foreign Editions of plaintiffs' books manufactured outside of the United States and resold them to purchasers in the United States through the Internet at the websites thetextbookguy.com, TextbookX.com, Albooks.com, and eBay.com. As of the filing of

this complaint, defendants had one hundred and eighty titles for sale at eBay.com.

FIRST CLAIM FOR RELIEF
(Copyright Infringement - 17 U.S.C. § 501)

22. Plaintiffs repeat the averments contained in paragraphs 1 through 23 as if set forth in full.

23. Pearson has received United States Certificates of Copyright Registration for the Pearson Copyrights.

24. Wiley has received United States Certificates of Copyright Registration for the Wiley Copyrights.

25. Cengage has received United States Certificates of Copyright Registration for the Cengage Copyrights.

26. McGraw-Hill has received United States Certificates of Copyright Registration for the McGraw-Hill Copyrights.

27. The Pearson, Wiley, Cengage and McGraw-Hill Copyrights are valid and enforceable.

28. Defendants have infringed the Pearson, Wiley, Cengage and McGraw-Hill Copyrights in violation of 17 U.S.C. § 501.

29. Defendants' acts have irreparably damaged and, unless enjoined, will continue to irreparably damage plaintiffs. Plaintiffs have no adequate remedy at law for these wrongs and injuries. Plaintiffs are, therefore, entitled to a preliminary

and permanent injunction restraining and enjoining defendants and their agents, servants, employees, and attorneys and all persons acting in concert with them, from infringing the Pearson, Wiley, Cengage and McGraw-Hill Copyrights.

30. Defendants have willfully infringed the Pearson, Wiley, Cengage and McGraw-Hill Copyrights.

31. Plaintiffs are entitled to recover all damages sustained as a result of defendants' unlawful conduct including (1) defendants' profits, or (2) plaintiffs' damages, or alternatively (3) statutory damages.

SECOND CLAIM FOR RELIEF

(Trademark Infringement - 15 U.S.C. § 1114(a))

32. Plaintiffs repeat the averments contained in paragraphs 1 through 33 above as if set forth in full.

33. Pearson is the exclusive licensee of the Pearson Trademarks, with the accompanying right and duty to protect and enforce Pearson's rights therein. Pearson's licensor parent and affiliate companies have obtained United States Trademark Registrations for the Pearson Trademarks.

34. Wiley owns the Wiley Trademarks, for which it has obtained United States Trademark Registrations.

35. Cengage owns or is the exclusive licensee of the Cengage Trademarks, with the accompanying right and duty to protect and enforce all rights therein. Cengage or its

licensors own the Cengage Trademarks, for which Cengage or its licensors have obtained United States Trademark Registrations.

36. McGraw-Hill owns the McGraw-Hill Trademarks, for which it has obtained United States Trademark Registrations.

37. The Pearson, Wiley, Cengage and McGraw-Hill Trademarks are valid and enforceable.

38. Defendants have infringed the Pearson, Wiley, Cengage and McGraw-Hill Trademarks in violation of 15 U.S.C. § 1114(a) by using them on and/or in connection with the works that they have sold.

39. Defendants' acts complained of herein have irreparably damaged plaintiffs and may continue to do so. The damage to plaintiffs includes harm to their good will and reputation in the marketplace for which money cannot compensate. Plaintiffs have no adequate remedy at law for these wrongs. Plaintiffs are, therefore, entitled to a preliminary and permanent injunction restraining and enjoining defendants, their agents, servants, employees, and attorneys and all persons acting in concert with them from using the Pearson, Wiley, Cengage and McGraw-Hill Trademarks or any colorable imitation of them.

40. Defendants have willfully infringed the Pearson, Wiley, Cengage and McGraw-Hill Trademarks.

41. Plaintiffs are entitled to recover (1) defendants' profits from the infringing books, (2) plaintiffs' damages, (3) the costs of the suit, and (4) reasonable attorneys' fees.

THIRD CLAIM FOR RELIEF

(Common Law Unfair Competition Under State Law)

42. Plaintiffs repeat the averments contained in paragraphs 1 through 43 above as if set forth in full.

43. Defendants' acts complained of herein have damaged and may continue to damage plaintiffs irreparably. The damage to plaintiffs includes harm to their goodwill and reputation in the marketplace for which money cannot compensate. Plaintiffs have no adequate remedy at law for these wrongs and injuries. Plaintiffs are, therefore, entitled to a preliminary and permanent injunction restraining and enjoining defendants, their agents, servants, employees, and attorneys and all persons acting in concert with them from using the Pearson, Wiley, Cengage and McGraw-Hill Trademarks or any colorable imitation of them, to restitution of defendants' ill-gotten gains, and to punitive damages in an amount to be determined by the trier of fact in this action.

WHEREFORE, plaintiffs demand judgment:

A. Preliminarily and permanently enjoining defendants, their agents, servants, employees, and attorneys and

all those acting in concert with them from infringing the Pearson, Wiley, Cengage and McGraw-Hill Copyrights in violation of 17 U.S.C. § 501;

B. Awarding plaintiffs their damages or defendants' profits, or alternatively, at plaintiffs' election, statutory damages, as a result of defendants' willful infringement of the Pearson, Wiley, Cengage and McGraw-Hill Copyrights;

C. Preliminarily and permanently enjoining defendants, their agents, servants, employees, and attorneys and all those acting in concert with them from infringing the Pearson, Wiley, Cengage and McGraw-Hill Trademarks in violation of 15 U.S.C. § 1114(a);

D. Awarding plaintiffs their damages and/or defendants' profits from their willful infringement of the Pearson, Wiley, Cengage and McGraw-Hill Trademarks pursuant to 15 U.S.C. § 1117(a);

E. Directing that defendants engage in such additional activities, including, but not limited to, recalls of products and corrective advertising, as may be necessary and appropriate to mitigate the damage defendants have caused;

F. Awarding plaintiffs their costs in this action, including their reasonable attorneys' fees pursuant 17 U.S.C. § 505 and 15 U.S.C. § 1117;

G. Awarding plaintiffs punitive damages in an amount to be determined by the trier of fact in this action; and

H. Granting such other and further relief as to this Court seems just and proper.

Dated: New York, New York
December 14, 2007

DUNNEGAN LLC

By s/William Dunnegan
William Dunnegan (WD9316)
Megan L. Martin (MM4396)
Attorneys for Plaintiffs
Pearson Education, Inc.,
John Wiley & Sons, Inc.,
Cengage Learning Inc., and
The McGraw-Hill Companies, Inc.
350 Fifth Avenue
New York, New York 10118
(212) 332-8300

Schedule A
"Pearson Copyrights"

Title
Date of Registration
Registration Number

Computer Networks
September 5, 2002
TX0005619281

Introduction to Electrodynamics
March 25, 1999
TX0004950391

Computer Networks and Internets
with Internet Applications
January 6, 1999
TX0004810217

Essentials of Systems Analysis
and Design
April 8, 2003
TX0005734493

Cryptography and Network Security
September 18, 2002
TX0005618035

A First Course in Probability
October 3, 2001
TX0005446395

Applied Multivariate Statistical
Analysis
April 30, 1982
TX0000920958

Linear Algebra and Its
Applications
January 6, 1994
TX0003704659

Digital Image Processing
April 6, 1987
TX0002040372

Comparative Politics Today:
A World View
February 11, 2000
TX0005210006

Solid State Electronic Devices
January 14, 1980
TX0000400264

Biochemistry
November 24, 1999
TX0005101621

Supply Chain Management: Strategy
Planning and Operation
January 1, 2001
TX0005323180

Mechanical Vibrations
February 23, 1990
TX0002754716

Manufacturing Engineering and
Technology
April 25, 1989
TX0002548820

Elements of Chemical Reaction
Engineering
July, 16, 1986
TX0001867133

Probability and Statistics For
Engineers and Scientists
January 15, 1998
TX0004697382

Probability and Statistical
Inference
February 13, 1997
TX0004478560

Digital Integrated Circuits: A
Design Perspective
May 13, 1996
TX0004294863

Modern Operating Systems
April 26, 2001
TX0005358150

Discrete-Event System Simulation
January 13, 1984
TX0001266105

Microeconomics
November 8, 1994
TX0003923511

Optics
September 8, 1987
TX0002152356

Business Communication Today
August 4, 1997
TX0004591208

Machine Design: An Integrated
Approach
March 14, 2000
TX0005094117

Strategic Management
February 13, 1997
TX0004493636

Digital Design: Principles
and Practices
May 19, 1994
TX0003838717

Principles of Risk Management
and Insurance
November 3, 1997
TX0004591153

Public Relations Practices
Managerial Case Studies
and Problems
April 26, 1985
TX0001559254

Signals, Systems, and Transforms
September 17, 1998
TX0004876927

Organizational Behavior
February 4, 2003
TX0005668575

Organizational Theory, Design,
and Change
June 12, 2003
TX0005738545

Introduction to Linear Programming
January 7, 2003
TX0005659588

Software Engineering:
Theory and Practice
May 20, 1998
TX0004771862

Managing Business Process Flows
April 26, 1999
TX0004972777

Product Design: Techniques in
Reverse Engineering and New
Product Development
April 5, 2001
TX0005308096

Engineering Economy
January 13, 1984
TX0001259415

Introduction to Analysis
July 20, 2000
TX0005263674

Essentials of Strategic Management
October 15, 1996
TX0004392643

Strategic Marketing for Nonprofit
Organizations
February 11, 1987
TX0002001170

Marketing Management
October 4, 1999
TX0005064805

Essentials of Entrepreneurship
and Small Business Management
August 7, 1997
TX0004587374

Consumer Behavior: Buying, Having
and Being
October 10, 1995
TX0004146854

International Business:
Environments and Operations
February 20, 2001
TX0005361504

Educational Psychology
April 30, 2003
TX0005719458

Principles of Marketing
February 28, 1996
TX0004072711

Field and Wave Electromagnetics
February 10, 1989
TX0002510851

Quantum Chemistry
October 4, 1999
TX0005053837

Data and Computer Communications
May 19, 1998
TX0004775560

Wireless Communications:
Principles and Practice
January 31, 1996
TX0004207639

Biostatistical Analysis
February 2, 1984
TX0001286001

Retail Management: A Strategic
Approach
December 2, 1997
TX0004674080

A Framework for Human Resource
Management
January 9, 2004
TX0005886945

Digital and Analog Communication
Systems
February 13, 1997
TX0004483532

Modern Experimental Biochemistry
January 15, 1986
TX0001736938

Fundamentals of Management:
Essential Concepts and
Applications
November 8, 1996
TX0004413848

Consumer Behavior: In Fashion
March 24, 2003
TX0005719039

University Physics with
Modern Physics
December 16, 1999
TX0005109733

Algorithm Design
March 29, 2005
TX0006145191

Discrete-Time Signal Processing
June 16, 1999
TX0004233852

Water Supply and Pollution
Control
April 13, 1998
TX0004751855

International Organizational
Behavior
December 10 1997
TX0004674201

Computer Networking: A Topdown
Approach
February 4, 2000
TX0005028267

An Experiential Approach to
Organization Development
February 22, 1988
TX0002261479

Introduction to Mathematical
Statistics
June 30, 1995
TX0003673484

Inside the Fashion Business
May 20, 1998
TX0004775564

Services Marketing: People,
Technology, Strategy
December 8, 2000
TX0005196334

Object-Oriented Software
Engineering: Using UML,
Patterns and Java
October 15, 2003
TX0005822836

Law and Economics
September 27, 1996
TX0004313756

System Dynamics
May 30, 1978
TX0000062187

Differential Equations and
Boundary Value Problems:
Computing and Modeling
February 1, 1996
TX0004193326

Inorganic Chemistry
May 20, 1991
TX0003078938

A First Course in Abstract Algebra
March 29, 1982
TX0000895068

Speech and Language Processing:
An Introduction to Natural
Language Processing, Computational
Linguistics and Speech Recognition
March 15, 2000
TX0005070379

Quality Control
March 22, 1990
TX0002765812

Human-Computer Interaction
June 8, 1998
TX0004801248

An Introduction to
Database Systems
April 28, 1981
TX0000696725

Introduction to Computer Security
November 24, 2004
TX0006074081

Takeovers, Restructuring, and
Corporate Governance
December 1, 1997
TX0004681505

Molecular Biology of the Gene
December 3, 1986
TX0001937951

Macroeconomics:
Theory and Policies
October 1, 2004
TX0006062789

Microbial Ecology:
Fundamentals and Applications
February 17, 1981
TX0000627160

Television Field Production
and Reporting
August 20, 1999
TX0005035245

Options, Futures and
Other Derivatives
May 20, 1998
TX0004772248

Experimental Psychology:
A Case Approach
December 29, 1997
TX0004749829

Business Logistics,
Supply Chain Management: Planning,
Organizing and Controlling
The Supply Chain
November 4, 2003
TX0005830610

Theory of Vibration
with Applications
June 17, 1988
TX0002338765

Aerodynamics for Engineers
June 18, 1979
TX0000269337

Inside Fashion Design
July 2, 1998
TX0004808391

Probability and Random Processes
for Electrical Engineering
February 10, 1989
TX0002498073

Writing Software Documentation:
A Task-Oriented Approach
October 29, 2002
TX0005650158

Econometric Analysis
January 10, 1997
TX0004453975

The Psychology of Gender
July 11, 2001
TX0005389271

A Framework for
Marketing Management
April 5, 2001
TX0005285667

Apparel manufacturing:
Sewn Product Analysis
October 4, 1999
TX0005053771

Psychology and Life
June 22, 1999
TX0004234774

Automation, Production Systems, and
Computer-Integrated Manufacturing
March 2, 1987
TX0002029549

Media Ethics:

Cases and Moral Reasoning
February 20, 1998
TX0004727444

Modern Control Engineering
May 9, 1990
TX0002833452

Management of Organizational
Behavior: Leading Human Resources
January 5, 2001
TX0005323917

Bioprocess Engineering:
Basic Concepts
December 19, 1991
TX0003221274

Mineralogy
July 6, 1998
TX0004690055

Microelectronic Circuits
And Devices
April 6, 1990
TX0002807944

Algebra
August 5, 1991
TX0003112202

Advanced Microeconomic Theory
August 2, 1991
TX0003114429

Marketing of Agricultural Products
January 22, 1998
TX0004699330

Artificial Intelligence:
A Modern Approach
May 19, 1995
TX0004065002

Psychological Testing
April 7, 1997
TX0004514941

Strategic Brand Management:
Building, Measuring, And
Managing Brand Equity
December 10, 1997
TX0004680991

Process Control:
Modeling, Design and Simulation
April 29, 2003
TX0005736756

Digital Design
April 6, 1992
TX0003293694

Consumer Behavior and
Managerial Decision Making
November 13, 1998
TX0004889446

The 8088 And 8086 Microprocessors:
Programming, Interfacing, Software,
Hardware And Applications
February 24, 1998
TX0004610331

Applied Strength of Materials
May 24, 1978
TX0000062184

Water Resources Engineering
December 27, 2001
TX0005475668

Ecology: Theories and Applications
May 16, 1996
TX0004294432

Basic Environmental Technology:
Water Supply, Waste Management,
and Pollution Control
November 27, 1996
TX0004422930

Computer System Architecture
April 30, 1982
TX0000916935

Digital Communications:
Fundamentals & Applications
April 26, 2001
TX0005300717

An Embedded Software Primer
October 14, 1999
TX0004273447

Entrepreneurship:
Strategies and Resources
August 26, 1998
TX0004708962

Transport Processes And
Separation Process Principles
March 24, 2003
TX0005717312

Introduction to Materials
Management
March 15, 1991
TX0003053800

File Structures: An Object-Oriented
Approach with C++
March 30, 1998
TX0004745828

Computer Security: Art and Science
January 17, 2003
TX0005669484

Corporate Computer and
Network Security
April 29, 2003
TX0005738767

Gravity: An Introduction to
Einstein's General Relativity
September 5, 2003
TX0005790892

Computer Systems:
A Programmer's Perspective
September 6, 2002
TX0005612141

Business Market Management:
Understanding, Creating and
Delivering Value
January 6, 1999
TX0004886006

Marketing of High-Technology
Products and Innovations
May 11, 2001
TX0005383721

Introduction to Biomedical
Engineering
March 30, 2004
TX0005948573

Mastering MATLAB 7
February 1, 2005
TX0006101499

Database Systems:
The Complete Book
October 25, 2001
TX0005451448

Communication Systems Engineering
March 29, 1994
TX0003733986

Internet and World Wide Web:
How To Program
December 27, 2001
TX0005533869

Operating Systems: Internals
and Design Principles
January 14, 1998
TX0004693854

Introduction To Risk
Management And Insurance
January 24, 1994
TX0003748331

Introduction to Operations
and Supply Chain Management
April 7, 2005
TX0006148566

Numerical Methods Using
February 27, 2004
TX0005917228

Capital Markets:
Institutions and Instruments
February 20, 1992
TX0003260060

Computer Systems Design
And Architecture
December 4, 1996
TX0004417759

Essentials of
Organizational Behavior
January 12, 1984
TX0001264630

Chemistry of the Environment
July 9, 1996
TX0004288163

Enterprise Resource Planning
December 8, 2004
TX0006084449

Cost Accounting: A
Managerial Emphasis
February 11, 1987
TX0002029088

Management Information Systems:
Managing The Digital Firm
August 7, 2001
TX0005366365

Miller and Freund's Probability
and Statistics for Engineers
March 29, 1994
TX0003793377

Market Based Management:
Strategies for Growing
Customer Value
and Profitability
April 7, 1997
TX0004498976

Advanced Management Accounting
March 22, 1982
TX0000881572

Fluid Power with Application
January 15, 1980
TX0000416330

Modern Physics for
Scientists and Engineers
June 17, 1991
TX0003090504

Microcomputer Engineering
May 11, 1993
TX0003553278

Fundamentals of Multimedia
December 22, 2003
TX0005888794

Contemporary Logic Design
October 12, 1993
TX0003647699

Structured Computer Organization
March 22, 1990
TX0002776195

Parallel Programming: Techniques
and Applications Using Networked
Workstations and
Parallel Computers
July 20, 2000
TX0005246705

Digital Image Processing
Using MATLAB®
March 9, 2004
TX0005919455

Discrete and Combinatorial
Mathematics:
An Applied Introduction
February 10, 1989
TX0002495008

Data Mining: Introductory
and Advanced Topics
October 15, 2002
TX0005622899

Operating Systems:
A Modern Perspective
July 17, 1997
TX0004594222

Adaptive Filter Theory
April 2, 1991
TX0003037722

Computer Ethics
January 11, 1985
TX0001538152

Designing the User Interface:
Strategies for Effective Human
Computer Interaction
June 22, 1992
TX0003336149

System Software: An Introduction
to Systems Programming
April 9, 1985
TX0001549364

Introduction to Robotics:
Mechanics and Control
June 16, 1989
TX0002595930

Management
December 8, 2004
TX0006082707

Advanced Organic Chemistry:
Reactions and Mechanisms
October 31, 1997
TX0004658918

Advanced Programming in the
UNIX(R) Environment
August 14, 1992
TX0003376367

Fundamentals of Nursing: Concepts,
Process, and Practice
February 21, 1991
TX0003063528

Computer Systems Organization
& Architecture
December 4, 2000
TX0005201208

Electronic Devices and
Circuit Theory
August 27, 1998
TX0004843967

Design Patterns Explained:
A New Perspective on
Object-Oriented Design
November 23, 2004
TX0006083017

Air Conditioning Principles
& Systems
August 4, 1997
TX0004627267

Behavior in Organizations
March 23, 2001
TX0005366679

Understanding Financial Statements
December 10, 1997
TX0004674181

Data Networks
January 29, 1992
TX0003236970

Introduction to Quantum Mechanics
October 4, 1994
TXu000642265

Introduction to Econometrics
December 20, 2002
TX0005659183

Elementary Statistics in
Social Research
August 8, 2003
TX0005870535

Fundamentals of Communication
Systems
February 2, 2005
TX0006126564

Semiconductor Device Fundamentals
February 28, 1996
TX0004201811

Marketing Research:
An Applied Orientation
February 17, 1994
TX0003783329

Introduction to Materials
Science for Engineers
April 25, 1996
TX0004270810

Introduction to Thermal Physics
September 7, 1999
TX0005040436

Classical Mechanics
September 7, 2001
TX0005437893

Integrated Advertising, Promotion,
and Marketing Communications
July 2, 2003
TX0005757691

Business Forecasting
December 2, 1994
TX0003959913

Inorganic Chemistry
May 20, 1991
TX0003078938

Introduction to Mathematical
Statistics
June 30, 1995
TX0003673484

A First Course in
Abstract Algebra
February 11, 1999
TX0004939856

Manufacturing Processes for
Engineering Materials
September 6, 2002
TX0005608352

Abnormal Psychology: The Problem
Of Maladaptive Behavior
August 7, 2001
TX0005424490

Manufacturing Processes for
Engineering Materials
September 6, 2002
TX0005608352

Schedule B
"Wiley Copyrights"

Title

Date of Registration

Registration Number

Materials Science and Engineering
February 19, 1997
TX0004486797

Design and Analysis of Experiments
February 21, 1997
TX0004478669

Advanced Engineering Mathematics
August 28, 2003
TX0005784074

Heating, Ventilating, and Air
Conditioning : Analysis and Design
August 4, 1988
TX0002447590

Signals and System
September 1, 1998
TX0004856638

Statistical Mechanics
October 13, 1987
TX0002184828

Accounting Principles
August 19, 1996
TX0004359133

Calculus:
One and Several Variables
March 5, 2003
TX0005691122

Physics
August 15, 2003
TX0005802903

Materials and Processes
in Manufacturing
March 3, 2003
TX0005704454

Architecture of Computer Hardware
and System Software
March 17, 2000
TX0005169120

Elementary Differential Equations
and Boundary Value Problems
August 25, 2000
TX0005257588

Managerial Accounting
December 21, 2001
TX0005472055

Principles of Genetics
April 21, 1997
TX0004526712

Fundamentals of Modern Manufacturing:
Materials, Processes, And Systems
December 31, 2001
TX0005466725

Process Dynamics and Control
December 12, 2003
TX0005834334

Engineering Fluid Mechanics
February 24, 1997
TX0004486875

Modern Physics
February 27, 1996
TX0004230649

Fundamentals of Machine Component
Design
May 22, 1991
TX0003123719

Introductory Mycology
March 28, 1996
TX0004217474

Introduction to Real Analysis
December 30, 1999
TX0005112424

Process Dynamics and Control
December 12, 2003
TX0005834334

Control Systems Engineering
October 3, 2003
TX0005800945

Classical Electrodynamics
August 5, 1998
TX0004828741

Fundamentals of Acoustics
March 2, 2000
TX0005148668

Mechanics of Materials
June 19, 2006
TX0006368212

Schedule C
"Thomson Copyrights"

Title

Date of Registration

Registration Number

Matlab Programming For Engineers

May 9, 2000

TX0005207592

Business Research Methods

February 7, 2005

TX0006116887

Analog And Digital Signal
Processing

March 5, 1999

TX0004942689

Computer Science: A Structured
Programming Approach Using C

April 24, 2000

TX0005204089

Investment Analysis and Portfolio
Management

December 8, 2004

TX0006070339

Foundations of Computer Science

July 23, 2002

TX0005596004

Fundamentals of Financial
Management

July 30, 2001

TX0005420250

Unix And Shell Programming

March 21, 2002

TX0005500553

Managing Human Resources

November 6, 1991

TX0003187427

Calculus: Early Transcendentals
July 16, 1999
TX0004241945

Schedule D
"McGraw-Hill Copyrights"

<u>Title</u>	<u>Date of Registration</u>	<u>Registration Number</u>
Human Development April 16, 2001 TX0005362452		
Strategic Management: Concepts And Cases April 22, 1993 TX0003547716		
Fundamentals of Corporate Finance March 22, 1993 TX0003541978		
Numerical Methods for Engineering April 4, 1988 TX0002295423		
Engineering Circuit Analysis August 1, 2001 TX0005361603		
Systems Analysis and Design Methods November 2, 2000 TX0005201138		
Operations Management for Competitive Advantage August 16, 2000 TX0005265436		
Manufacturing Planning and Control for Supply Chain Management August 24, 2004 TX0006017578		
Business Research Methods August 17, 2000 TX0005149077		

Engineering Electro-magnetics
July 21, 2000
TX0005259796

Statistical Quality Control
March 5, 1996
TX0004215157

Power Systems Analysis
February 25, 1994
TX0003815506

Principles of Neurocomputing for
Science and Engineering
November 22, 2000
TX0005196036

Introduction to Logic Design
October 10, 2001
TX0005485014

Probability, Random Variables
and Stochastic Processes
February 14, 1991
TX0003010182

Services Marketing: Integrating
Customer Focus Across The Firm
November 14, 2002
TX0005635594

Semiconductor Physics And
Devices: Basic Principles
November 13, 2002
TX0005608842

Principles Of Corporate Finance
March 10, 2003
TX0005672907

Programming in Visual
Basic.Net-2003
February 28, 2003
TX0005700782

Advertising And Promotion
December 7, 2000
TX0005308923

Parallel Programming In C
With Mpi And Openmp
October 15, 2003
TX0005824276

Digital Signal Processing
February 10, 1998
TX0004713026

Electronic Circuit Analysis
and Design
August 14, 2000
TX0005257043

Introduction to Operations
Research
October 19, 2000
TX0005176649

Concepts Of Modern Physics
December 20, 2002
TX0005643648

Design Of Machinery
August 4, 2000
TX0005318052

TCP/IP Protocol Suite
September 10, 2002
TX0005606559

Product Management
July 17, 2001
TX0005417698

Designing And Managing The
Supply Chain
August 27, 1999
TX0005023105

Vector Mechanics for Engineers,
Statics and Dynamics
February 10, 1998
TX0004713006

Heat Transfer
December 6, 2001
TX0005490794

Management Control Systems
August 2, 2000
TX0005259808

Introduction to Information
Systems
February 17, 1995
TX0003978149

Management Information Systems
July 27, 1993
TX0003599463

Corporate Information Strategies
and Management
October 29, 2002
TX0005643062

Experimental Methods for Engineers
July 28, 2000
TX0005276088

Macroeconomics
April 27, 2004
TX0005956379

Economics
January 21, 1992
TX0003228468

Design of Concrete Structures
January 30, 2004
TX0005906750

Manufacturing Planning and Control
for Supply Chain Management
August 24, 2004
TX0006018551

Financial Institutions Management
December 20, 1999
TX0005195742

International Business: Competing
in the Global Marketplace
September 18, 2002
TX0005594382

Risk Management and Insurance
August 1, 2003
TX0005756928

Heat Transfer : A Practical
Approach
March 10, 2003
TX0005672906

Basic Econometrics
December 19, 2002
TX0005655396

Corporate Finance
February 12, 1990
TX0002751695

Introduction to Computing
Systems: From Bits and Gates to
C and Beyond
October 23, 2000
TX0005291247

Multimedia: Making it Work
August 1, 2001
TX0005422639

Financial Markets and Institutions
May 7, 2003
TX0005741116

Introduction to Management Science
February 26, 2003
TX0005695585

Chemistry
October 31, 1997
TX0004649635

Marketing
August 9, 2000
TX0005281870

Analysis and Design of Digital
Integrated Circuits: In Deep
Submicron Technology
July 30, 2003
TX0005771910

Biology
March 1, 1999
TX0004942746

International Marketing
November 22, 1995
TX0004164035

Java 2: The Complete Reference
January 25, 2001
TX0005314585

Basic Marketing
April 5, 1990
TX0002787571

Fundamentals of Thermal-Fluid
Science
July 25, 2000
TX0005143805

Elements of Gas Turbine Propulsion
December 21, 1995
TX0004171297

*no longer a McGraw copyright, but at time of sale it was

Programming in Visual Basic 6.0
February 19, 2002
TX0005484574

Digital Filters
April 28, 1993
TX0003538249

Introduction to Fortran 90/95
February 10, 1998
TX0004713041

Supply Chain Strategy
November 14, 2001
TX0005488603

Mems and Microsystems: Design
and Manufacture
December 6, 2001
TX0005462852

Programming Languages:
Principles and Paradigms
November 30, 2001
TX0005462830

Managing Human Resources:
Productivity, Quality Of
Work Life, Profits
October 17, 2002
TX0005630084

Decision Support and Data
Warehouse Systems
January 27, 2000
TX0005129186

Physical Chemistry
October 17, 2001
TX0005470348

Human Resources Management:
An Experiential Approach
December 21, 1992
TX0003456347

Business Data Communications
September 10, 2002
TX0005606433

CMOS Digital Integrated Circuits:
Analysis and Design
December 19, 2002
TX0005659287

Discrete Mathematics and
Its Applications
December 20, 2002
TX0005643474

Design With Operational Amplifiers
And Analog Integrated Circuits
September 17, 2001
TX0005389698

Electric Machinery
December 12, 2002
TX0005648170

Fundamentals of Digital Logic
With Verilog Design
December 20, 2002
TX0005658408

Wastewater Engineering:
Treatment and Reuse
October 31, 1990
TX0002940941

Cost Management
October 9, 2002
TX0005619210

Sql: The Complete Reference
May 5, 1999
TX0004891473

World Class Supply Management:
the Key To Supply Chain Management
December 12, 2002
TX0005643424

Introduction to Languages and
the Theory of Computation
October 10, 1990
TX0002925668

Management Information Systems:
solving Business Problems with
Information Technology
October 7, 1999
TX0004986280

Voice and Data Communications
Handbook
June 28, 1996
TX0004389400

Organizational Behavior: Human
Behavior at Work
June 14, 2001
TX0005360845

Your Unix: The Ultimate Guide
February 5, 2001
TX0005341832

Statistical Quality Control
March 5, 1996
TX0004215157

Communication Electronics:
Principles and Applications
November 22, 1999
TX0005104883

Chemistry For Environmental
Engineering
October 22, 2002
TX0005660550

Accounting: Text And Cases
January 3, 1989
TX0002472960

Mechanics Of Materials
July 6, 2001
TX0005344495

Management Information Systems
For Information Age
August 1, 2001
TX0005361605

Antennas For All Application's
December 27, 2001
TX0005492785

Measurement Systems
October 20, 2003
TX0005831987

Management of a Sales Force
January 2, 2003
TX0005666565

Data Communications and Networking
June 19, 2000
TX0005133862

Simulation Modeling And Analysis
February 1, 2000
TX0005124654

Financial Markets and Corporate
Strategy
November 13, 2001
TX0005471539

Concepts in Biology
December 23, 2002
TX0005783486

Operations Management
July 24, 2001
TX0005391344

Marketing Management
Text and Cases
August 24, 2004
TX0006017691

Leadership: Enhancing the Lessons
of Experience
December 27, 2001
TX0005490584

International Financial Management
October 14, 2003
TX0005816374

Ethics In Engineering
January 3, 1989
TX0002473742

Managing Organizational Change
May 5, 2005
TX0006220852

Project Management
December 20, 2002
TX0005670846

Psychological Testing and
Assessment: An Introduction
To Tests and Measurement
October 14, 2004
TX0006057033

Fundamentals Of Finite
Element Analysis
October 14, 2003
TX0005824274

Synthesis And Optimization Of
Digital Circuits
March 22, 1994
TX0003763958

Design of Analog CMOS Integrated
Circuits
January 25, 2001
TX0005339805

Health Psychology
September 11, 1995
TX0004130156

Manual of Structural Kinesiology
March 16, 1998
TX0004660292

Communication Networks
February 1, 2000
TX0005028300

Case Studies in Finance
November 11, 2002
TX0005630838

Fundamentals of Human Resource
Management
October 14, 2003
TX0005837555

Heat and Mass Transfer: A
Practical Approach
June 5, 2006
TX0006361721

Vertebrates : Comparative Anatomy,
Function, Evolution
October 24, 1997
TX0004663920

Adolescence
December 20, 2002
TX0005655393

Child Development
November 20, 1997
TX0004672151

Introduction to Computing
Systems: From Bits and Gates
to C and Beyond
October 23, 2000
TX0005291247

Schedule D
"Pearson Trademarks"

	<u>U.S. Trademark</u>	<u>Registration Number</u>	<u>Class</u>
1.	"Pearson"	2,599,724	009, 016, 035, 042
2.	"Pearson"	2,600,081	041
3.	"Pearson"	2,652,792	009, 016
4.	"Pearson"	2,679,355	016
5.	"Pearson"	2,691,830	041
6.	"Pearson"	2,694,359	009
7.	"Prentice-Hall"	1,332,044	016
8.	"Prentice-Hall"	1,332,639	042
9.	"Prentice-Hall"	1,375,654	009
10.	"Addison Wesley"	2,188,798	016
11.	"Addison-Wesley"	2,400,130	016
12.	"Benjamin Cummings"	2,674,589	016
13.	"Benjamin Cummings"	2,671,773	041
14.	"Benjamin Cummings"	2,671,772	041
15.	"Benjamin Cummings"	2,621,299	016
16.	"Benjamin Cummings"	1,189,279	016

Schedule F
Wiley Trademarks

	<u>U.S. Trademark</u>	<u>Registration Number</u>	<u>Class</u>
1.	"JW" Colophon	2,168,941	009, 042
2.	"Wiley"	1,003,988	009, 016, 036, 038
3.	"Wiley"	2,159,987	009, 042

Schedule G
Cengage Trademarks

<u>U.S. Trademark</u>	<u>Registration Number</u>	<u>Class</u>
1. "Thomson Learning"	2,810,953	009, 016, 041
2. "Thomson Learning"	2,926,467	035

Schedule H
McGraw-Hill Trademarks

<u>U.S. Trademark</u>	<u>Registration Number</u>	<u>Class</u>
1. "McGraw-Hill"	1,350,345	16
2. "McGraw-Hill" Bug	2,899,528	16, 41
3. "The McGraw-Hill Companies"	3,103,212	9,16,35,36,37, 38,39,40,41,42
4. "Irwin"	1,718,118	16
"Irwin"	1,718,118	16