

JUDGE McMAHON

10 CV 5994

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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

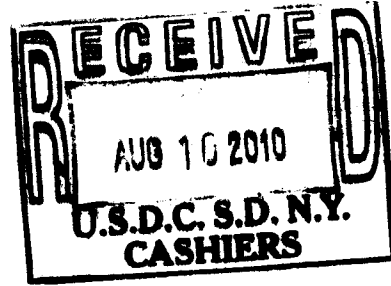
Plaintiffs, :

- against - :

THOMAS BRISBEY AND SARA MCGEE :
BOTH D/B/A TBRISBEY4 D/B/A :
TIGGER_GIRL1983 AND :
JOHN DOE NOS. 1-5, :

Defendants. :

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10 Civ.

COMPLAINT

Plaintiffs Pearson Education, Inc. ("Pearson"), John Wiley & Sons, Inc. ("Wiley"), Wiley Publishing, Inc. ("Wiley Publishing"), Cengage Learning, Inc. ("Cengage"), and The McGraw-Hill Companies, Inc. ("McGraw-Hill"), by their undersigned attorneys, for their complaint against defendants Thomas Brisbey ("Brisbey") and Sara McGee ("McGee") both d/b/a Tbrisbey4 d/b/a Tigger_girl1983 and John Doe Nos. 1-5 aver:

Nature of the Action

1. Plaintiffs are bringing this action to obtain legal and equitable relief to remedy defendants' infringement of plaintiffs' copyrights and trademarks through their sales of counterfeit and pirated copies of plaintiffs' well-known works.

Jurisdiction and Venue

2. This Court has subject matter jurisdiction over the first three claims for relief 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. The Court has subject matter jurisdiction over the fourth claim for relief under 28 U.S.C. § 1367 because it is so related to the claims within the original jurisdiction of the Court that they form the same case or controversy under 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 the State 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. Wiley Publishing is a corporation organized and existing under the laws of the State of Delaware with its

principal place at 111 River Street, Hoboken, New Jersey 07030. Wiley Publishing is a wholly-owned subsidiary of Wiley.

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

8. 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.

9. Upon information and belief, defendant Brisbey is a natural person residing at 21868 Farmington Road, Apt 208, Farmington, Michigan 48336.

10. Upon information and belief, defendant McGee is a natural person residing at 17729 Delaware Avenue, Redford, Michigan 48240.

11. Upon information and belief, defendants John Doe Nos. 1-5 are associates of Brisbey and McGee whose identities are presently unknown to plaintiffs.

The Business of Plaintiffs

12. Plaintiffs are some of the world's largest publishers of books and journals. Each year, plaintiffs publish a variety of works, including educational books.

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

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

15. 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.

16. Plaintiffs routinely register their copyrights. Pearson has generally registered its copyrights in its works, including the works on Schedule A (the "Pearson Copyrights"). Wiley has generally registered its copyrights in its works, including the works on Schedule B (the "Wiley Copyrights"). Wiley Publishing has generally registered its copyrights in its

works, including the works on Schedule C (the "Wiley Publishing Copyrights"). Cengage has generally registered its copyrights in its works, including the works on Schedule D (the "Cengage Copyrights"). McGraw-Hill has generally registered its copyrights in its works, including the works on Schedule E (the "McGraw-Hill Copyrights").

17. Pearson, Wiley, Wiley Publishing and McGraw-Hill also own numerous trademarks that they use to differentiate products from those of their competitors.

18. Among Pearson's well-known trademarks are "Pearson," "Pearson Education" and "Prentice Hall." Pearson 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 F.

19. 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 G.

20. Among Wiley Publishing's well-known trademarks are "For Dummies Standard Character Mark," "For Dummies Design Plus Words" and "Dummies Man Logo" (the "Wiley Publishing Trademarks"). The United States Registrations for the Wiley Publishing Trademarks are identified on Schedule H.

21. 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 I.

Defendants' Actions

22. Defendants have, without plaintiffs' permission or consent, sold pirated and counterfeit CDs and downloadable e-books that infringe the plaintiffs' copyrights and trademarks.

23. Defendants have sold these pirated and counterfeit CDs and e-books using Internet auction services, such as eBay, using the usernames including, but not limited to, tbrisbey4 d/b/a Tigger_girl1983, and have delivered these CDs and e-books using the United States mail and other facilities of interstate commerce to purchasers residing in the United States, including purchasers in this District.

24. Upon information and belief, defendants have sold these pirated and counterfeit CDs and e-books with the intent to trade off the goodwill plaintiffs have earned and to confuse the

public into believing that the products defendants sell originate from plaintiffs.

FIRST CLAIM FOR RELIEF
(Trademark Infringement -- 15 U.S.C. § 1114(a))

25. Plaintiffs repeat the allegations contained in Paragraphs 1 through 24 above as if set forth in full.

26. 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.

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

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

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

30. The Pearson, Wiley, Wiley Publishing and McGraw-Hill Trademarks are valid and enforceable.

31. Defendants have infringed the Pearson, Wiley, Wiley Publishing and McGraw-Hill Trademarks in violation of 15 U.S.C. § 1114(a) by using the Pearson, Wiley, Wiley Publishing

and McGraw-Hill Trademarks in their CDs and e-books without plaintiffs' consent.

32. 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, or McGraw-Hill Trademarks or any colorable imitation of them.

33. Because defendants have willfully infringed the Pearson, Wiley and McGraw-Hill Trademarks, Plaintiffs are entitled to recover (1) defendants' profits from the infringing CDs and e-books, (2) plaintiffs' damages, (3) the costs of the suit, and (4) reasonable attorneys' fees.

SECOND CLAIM FOR RELIEF
(Trademark Counterfeiting - 15 U.S.C. § 1117)

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

35. In connection with the sale of their pirated CDs and e-books, defendants have used counterfeits of the Pearson, Wiley, Wiley Publishing and McGraw-Hill Trademarks.

36. Based upon defendants' use of counterfeits of the Pearson, Wiley, Wiley Publishing and McGraw-Hill Trademarks in connection with their sales of pirated CDs and e-books, Plaintiffs are entitled to recover treble damages, treble profits, and/or statutory damages, pursuant to 15 U.S.C. § 1117(b) and (c).

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

37. Plaintiffs repeat the averments in paragraphs 1 through 36 as if set forth in full.

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

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

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

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

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

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

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

45. 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 a 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, Wiley Publishing, Cengage and McGraw-Hill Copyrights.

46. Defendants have willfully infringed the plaintiffs' Copyrights. Plaintiffs are therefore entitled to recover (1) defendants' profits, or (2) plaintiffs' damages, or alternatively (3) statutory damages.

FOURTH CLAIM FOR RELIEF
(Common Law Unfair Competition)

47. Plaintiffs repeat the averments in paragraphs 1 through 46 above as if set forth in full.

48. 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 a 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, Wiley Publishing and McGraw-Hill Trademarks or any colorable imitation or variation of them, to restitution of defendants' ill-gotten gains, and to punitive damages.

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, Wiley Publishing, 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' infringement of the Pearson, Wiley, Wiley Publishing, 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 and counterfeiting the Pearson, Wiley, Wiley Publishing 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 and/or counterfeiting of Pearson, Wiley, Wiley Publishing and McGraw-Hill Trademarks pursuant to 15 U.S.C. § 1117(a);

E. Awarding plaintiffs treble damages, treble profits and/or statutory damages pursuant to 15 U.S.C. § 1117(b) and (c);

F. Awarding plaintiffs the costs in this action, including its 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
August 10, 2010

DUNNEGAN LLC

By 

William Dunnegan (WD9316)
Laura Scileppi (LS0114)
Attorneys for Plaintiffs
Pearson Education, Inc.
John Wiley & Sons, Inc.
Wiley Publishing, Inc.
Cengage Learning, Inc.
The McGraw-Hill Companies, Inc.
350 Fifth Avenue
New York, New York 10118
(212) 332-8300

Schedule A
"Pearson Copyrights"

Title, Edition (Author) (Date of Registration) (Registration #)

1. Advanced Modern Algebra, 1st Edition (Joseph J. Rotman)
(June 3, 2002) (TX0005539838)
2. Algebra & Trigonometry Graphs & Models, 3rd Edition (Marvin
L. Bittinger) (June 10, 2005) (TX0006180015)
3. Algorithms, 2nd Edition (R. Sedgewick) (May 3, 1988)
(TX0002309212)
4. Bioinformatics Computing, 1st Edition (Bryan Bergeron)
(January 15, 2003) (TX0005730451)
5. Biology, 6th Edition (Neil Campbell) (February 28, 2002)
(TX0005482385)
6. Introduction to Electrodynamics, 3rd Edition (David J
Griffiths) (March 25, 1999) (TX0004950391)
7. Linear Algebra And Its Applications, 3rd Edition (David C
Lay) (December 20, 2002) (TX0005659182)
8. Modern Experimental Biochemistry, 2nd Edition (Rodney F.
Boyer) (August 25, 1993) (TX0003582506)
9. Topology, 2nd Edition (James Munkres) (January 19, 2000)
(TX0005081467)
10. Understanding Biotechnology, 1st Edition (Fabricio R.
Santos) (April 11, 2003) (TX0005729664)

Schedule B
"Wiley Copyrights"

Title, Edition (Author) (Date of Registration) (Registration #)

1. Advanced Calculus with Applications in Statistics, Second Edition (Andre Khuri) (January 30, 2003) (TX0005667244)
2. Applied Cryptography: Protocols, Algorithms and Source Code in C (Bruce Schneier) (April 1, 1994) (TX0003780974)
3. Applied Statistics and Probability for Engineers, Fourth Edition (Douglas Montgomery) (August 25, 2006) (TX0006428380)
4. Bioinformatics: A Practical Guide to the Analysis of Genes and Proteins, Third Edition (Andy Baxevanis) (December 17, 2004) (TX0006085374)
5. Bionanotechnology: Lessons from Nature (David Goodsell) (March 12, 2004) (TX0005946895)
6. Biotech Industry: A Global, Economic and Financing Overview (Bryan Bergeron) (March 12, 2004) (TX0005946891)
7. Cell Biology: A Short Course, Second Edition (Stephen Bolsover) (February 20, 2004) (TX0005909423)
8. Classical Electrodynamics, Third Edition (J. David Jackson) (August 5, 1998) (TX0004828741)
9. Companies Are People Too (Sandra Fekete) (June 11, 2004) (TX0005989369)
10. Comprehensive Handbook of Personality and Psychopathology, 3-Volume Set (Michael Hersen) (January 9, 2006) (TX0006303388)
11. Data Mining: Multimedia, Soft Computing and Bioinformatics (Sushmita Mitra) (November 4, 2003) (TX0005852718)
12. Developmental Psychopathology, Second Edition, Volume 1: Theory and Method (Dante Cicchetti) (May 16, 2006) (TX0006354707)

13. Developmental Psychopathology, Second Edition, Volume 2: Developmental Neuroscience (Dante Cicchetti) (May 16, 2006) (TX0006354708)
14. Developmental Psychopathology, Second Edition, Volume 3: Risk, Disorder and Adaptation (Dante Cicchetti) (May 16, 2006) (TX0006354709)
15. Elementary Differential Equations and Boundary Value Problems, Seventh Edition (William Boyce) (August 25, 2000) (TX0005257588)
16. The Elements of Real Analysis, Second Edition (Robert Bartle) (August 7, 1964) (A-707466) (November 2, 1992) (RE-597794)
17. Essentials of Psychological Testing (Susana Urbina) (August 20, 2004) (TX0006013889)
18. Fundamentals of College Geometry, Second Edition (Edwin Hemmerling) (December 31, 1969) (A-117613) (December 30, 1998) (RE-793348)
19. Handbook of Adolescent Psychology, Second Edition (Richard Lerner) (February 27, 2004) (TX0005917503)
20. Handbook of Dementia (Peter Lichtenberg) (August 29, 2003) (TX0005796703)
21. Handbook of Personology and Psychopathology (Stephen Strack) (March 15, 2005) (TX0006139929)
22. Handbook of Psychological Assessment, Fourth Edition (Gary Groth-Marnat) (May 19, 2003) (TX0005745006)
23. Handbook of Psychology, Volume 1: History of Psychology (Irving Weiner) (March 24, 2003) (TX0005704452)
24. Handbook of Psychology, Volume 2: Research Methods in Psychology (Irving Weiner) (March 18, 2003) (TX0004447380)
25. Handbook of Psychology, Volume 3: Biological Psychology (Irving Weiner) (March 18, 2003) (TX0004447383)
26. Handbook of Psychology, Volume 4: EXperimental Psychology (Irving Weiner) (March 18, 2003) (TX0004447382)

27. Handbook of Psychology, Volume 5: Personality and Social Psychology (Irving Weiner) (March 18, 2003) (TX0004447381)
28. Handbook of Psychology, Volume 6: Developmental Psychology (Irving Weiner) (March 24, 2003) (TX0005701474)
29. Handbook of Psychology, Volume 7: Educational Psychology (Irving Weiner) (March 24, 2003) (TX0005701472)
30. Handbook of Psychology, Volume 8: Clinical Psychology (Irving Weiner) (March 19, 2003) (TX0005696672)
31. Handbook of Psychology, Volume 9: Health Psychology (Irving Weiner) (March 19, 2003) (TX0005696710)
32. Handbook of Psychology, Volume 10: Assessment Psychology (Irving Weiner) (March 25, 2003) (TX0005701476)
33. Handbook of Psychology, Volume 11: Forensic Psychology (Irving Weiner) (March 24, 2003) (TX0005701475)
34. Handbook of Psychology, Volume 12: Industrial and Organizational Psychology (Irving Weiner) (March 24, 2003) (TX0005701473)
35. An Introduction to Numerical Analysis for Electrical and Computer Engineers (Christopher Zarowski) (May 28, 2004) (TX0005965293)
36. Introduction to Probability Theory and Its Applications, Volume 1, Third Edition (William Feller) (January 24, 1968) (A-966318)
37. Mechanical Trading Systems: Pairing Trader Psychology with Technical Analysis (Richard Weissman) (March 8, 2008) (TX0006121360)
38. Modern Algebra with Applications, Second Edition (William Gilbert) (December 16, 2003) (TX0005869421)
39. Organizational Psychology: A Scientist-Practitioner Approach (Steve Jex) (June 20, 2002) (TX0005550396)
40. Partial Differential Equations and the Finite Element Method (Pavel Solin) (January 24, 2006) (TX0006304640)

41. Personality Disorders in Modern Life, Second Edition
(Theodore Millon) (September 24, 2004) (TX0006049708)
42. Practical Genetic Algorithms, Second Edition (Randy Haupt)
(July 16, 2004) (TX0006005242)
43. Probability and Finance: It's Only a Game! (Glenn Shafer)
(July 9, 2001) (TX0005408340)
44. Rational Choice and Judgment: Decision Analysis for the
Decider (Rex Brown) (May 31, 2005) (TX0006176000)
45. Textbook of Biological Psychiatry (Jaak Panksepp) (December
17, 2003) (TX0005877773)

Schedule C
"Wiley Publishing Copyrights"

Title, Edition (Author) (Date of Registration) (Registration #)

1. Calculus Workbook For Dummies (Mark Ryan) (October 12, 2005) (TX0006251679)
2. Statistics For Dummies (Deborah Rumsey) (September 30, 2003) (TX0005815414)

Schedule D
"Cengage Copyrights"

- | <u>Title, Edition</u> | <u>(Author)</u> | <u>(Date of Registration)</u> | <u>(Registration #)</u> |
|---|-------------------|-------------------------------|-------------------------|
| 1. Introduction to Botany, 1sr Edition | (SCHOOLEY) | (February 18, 1997) | (TX0004497499). |
| 2. Genetics: vol. 1-4, A-Z, 1 st Edition | | (March 26, 2003) | (TX0005733308). |
| 3. Biology: vol. 1-2, A-H, 1 st Edition | (Robinson) | (October 7, 2002) | (TX0005635401). |
| 4. Biology: vol. 3-4, I-Po--Pr-Z, cumulative index, 1 st Edition | (Robinson) | (October 7, 2002) | (TX0005635402). |
| 5. Complete Solutions Manual for Stewart's Single Variable Calculus: Early Transcendentals, 5 th Edition | (STEWART) | (August 4, 2004) | (TX0006023186). |
| 6. Calculus: Early Transcendentals, 5 th Edition | (STEWART) | (January 15, 2003) | (TX0005641915). |
| 7. Calculus: Concepts and Contexts, 1 st Edition | (STEWART) | (July 2, 1998) | (TX0004830391). |
| 8. Master Math: Pre-Calculus and Geometry, 1 st Edition | (ROSS) | (July 10, 1996) | (TX0004326123). |
| 9. The Gale Encyclopedia of Psychology, 2 nd Edition | (Strickland) | (March 2, 2001) | (TX0005355954). |
| 10. The Gale Encyclopedia of Mental Disorders: vols. 1-2, 1 st Edition | (Thackery/Harris) | (March 14, 2003) | (TX0005702551). |
| 11. Digital Boudoir Photography: A Step-By-Step Guide to Creating Fabulous Images of Any Woman, 1 st Edition | (BLAIR) | (September 29, 2006) | (TX 6-442-533). |

Schedule E
 "McGraw-Hill Copyrights"

Title, Edition (Author) (Date of Registration) (Registration #)

1. Algebra Demystified, 1st Edition (Huettenmueller) (August 9, 2002) (TX0005587928)
2. Basic Concepts in Biochemistry A Student's Survival Guide, 2nd Edition (Gilbert) (November 23, 1999) (TX0005099907)
3. Biology, 6th Edition (Raven) (June 14, 2001) (TX0005393646)
4. Calculus Demystified, 1st Edition (Krantz) (August 9, 2002) (TX0005587927)
5. Bob Miller's Calc for the Clueless, CALC I, 2nd Edition (Miller) (February 10, 1998) (TX0004744157)
6. Bob Miller's Calc for the Clueless, Calc III, 2nd Edition (Miller) (February 10, 1998) (TX0004744158)
7. Complex Analysis: An Introduction to the Theory of Analytic Functions of One Complex Variable, 3rd Edition (Ahlfors) (November 20, 1978) (TX0000163489)
8. Elementary Number Theory, 6th Edition (Burton) (January 3, 2006) (TX0006317490)
9. Environmental Biotechnology Principles and Applications, 1st Edition (Rittmann/McCarty) (July 28, 2000) (TX0005256944)
10. Harper's Illustrated Biochemistry, 27th Edition (Murray/Granner/Rodwell) (June 22, 2006) (TX0006402370)
11. How To Solve Word Problems In Calculus, 1st Edition (Don/Don) (July 26, 2001) (TX0005419537)
12. Human Anatomy, 6th Edition (Kent Van De Graaff) (July 12, 2001) (TX0005350027)
13. Probability, Random Variables and Stochastic Processes, 3rd Edition (Papoulis) (February 14, 1991) (TX0003010182)

14. Real and Complex Analysis, 3rd Edition (Rudin) (August 11, 1986) (TX0001887185)
15. Review of Medical Physiology, 21st Edition (Ganong) (May 7, 2003) (TX0005673226)
16. Schaum's Easy Outline Molecular and Cell Biology, 1st Edition (Stansfield) (April 15, 2003) (TX0005716159)
17. Schaum's Easy Outline Biology, 1st Edition (Fried) (November 5, 2001) (TX0005355972)
18. Schaum's Outline of Theory and Problems of Human Anatomy and Physiology, 1st Edition (Rhees) (December 30, 1986) (TX0001982842)
19. Schaum's Outline of Theory and Problems of Advanced Calculus, 2nd Edition (Wrede/Spiegel) (December 20, 2002) (TX0005643646)
20. Schaum's Outline of Theory and Problems of Finite Mathematics, 2nd Edition (Lipschutz) (January 10, 1995) (TX0003968659)
21. Schaum's Outline of Theory and Problems of Genetics, 3rd Edition (Stansfield) (March 25, 1991) (TX0003053124)
22. Schaum's Outline of Theory and Problems of Statistics 2nd Edition (Spiegel) (July 25, 1989) (TX0002618405)
23. Zoology, 5th Edition (Miller/Harley) (June 29, 2001) (TX0005405650)

Schedule F
"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 G
"Wiley Trademarks"

<u>U.S. Trademark</u>	<u>Registration Number</u>	<u>Class</u>
1. "JW" Colophon	2168941	009, 042
2. "Wiley"	1003988	009, 016, 036, 038
3. "Wiley"	2159987	009, 042

Schedule H
"Wiley Publishing Trademarks"

<u>U.S. Trademark</u>	<u>Registration Number</u>	<u>Class</u>
1. "For Dummies"	3167658	016
2. "For Dummies"	2475136	016
3. "Dummies Man" Logo	2245458	016

Schedule I
"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"	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