



# Claim Form

In the High Court of Justice  
Business and Property Courts of England and Wales  
Intellectual Property List (ChD)



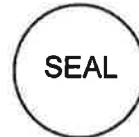
Fee Account no.	IL-2018-000176
Help with Fees - Ref. no. (if applicable)	H W F - <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/>

You may be able to issue your claim online which may save time and money. Go to [www.moneyclaim.gov.uk](http://www.moneyclaim.gov.uk) to find out more.

Claim no.	<input type="text"/>
Issue date	<input type="text"/>

Claimant(s) name(s) and address(es) including postcode

Easygroup Limited, 10 Ansdell Street, London W8 5BN.



Defendant(s) name and address(es) including postcode

- (1) Netflix, Inc, 100 Winchester Circle, Los Gatos, California 95032, USA.
- (2) Joe Swanberg, 2241 W Winona St, Chicago, Illinois 60625, USA

For further details of the courts [www.gov.uk/find-court-tribunal](http://www.gov.uk/find-court-tribunal).

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

N1 Claim form (CPR Part 7) (06.16)

This form is reproduced from <http://hmctsformfinder.justice.gov.uk/HMCTS/FormFinder.do> and is subject to Crown copyright protection. Contains public sector information licensed under the Open Government Licence v3.0

© Crown Copyright 2016

**Brief details of claim**

The Claimant runs and/or owns the brands of numerous businesses trading under names comprising the word "easy" typically containing a second word alluding to the key goods and/or services offered under the brand (including, without limitation, easyJet, easyEntertainment and easyCinema). Such businesses are operated or licensed by the Claimant under the sign "easy" (the "Sign") or a sign containing the Sign, in which the Claimant has built up considerable goodwill and reputation in the EU.

The Claimant's claim is for:

1. Infringement and/or threatened infringement of a number of registered European Union trade marks including numbers: 1699792, 10583111, 1232909, 2989416, 3838455, 2469690 and 2469716 ("the Registered Marks").
2. Passing off and / or threatened passing off.

The Claimant claims that the Defendants have and together have, with a common purpose, infringed the Claimant's rights in the Sign and seeks: (1) an injunction to restrain the Defendants from (a) using the Sign in the EU, (b) otherwise infringing the Registered Marks or any of them, and (c) otherwise passing off goods or services, contrary to fact, as the goods or services of the Claimant (or as goods or service authorised by or connected or associated with the Claimant); (2) an order for delivery up or destruction of all infringing articles in the Defendants' possession, custody or control the use of which would breach any element of the injunctions in (1) above; (3) damages or an account of profits for the infringement; (4) an order for dissemination and publication of judgment; (5) costs; (6) interest, and (7) further or other relief.

Full details of the Claimant's claim will be set out in the Particulars of Claim (to follow).

**Value**

The Claimant does not expect to recover more than £10,000 in damages.

You must indicate your preferred County Court Hearing Centre for hearings here (see notes for guidance)

N/A

Defendant's name and address for service including postcode

(1) Netflix, Inc, 100 Winchester Circle, Los Gatos, California 95032, USA.

(2) Joe Swanberg, 2241 W Winona St, Chicago, Illinois 60625, USA

£	
Amount claimed	Not fixed
Court fee	983.00
Legal representative's costs	To be assessed
<b>Total amount</b>	

<b>Claim No.</b>	
------------------	--

Does, or will, your claim include any issues under the Human Rights Act 1998?     Yes  No

Particulars of Claim to follow.

**Statement of Truth**

\*The Claimant believes that the facts stated in these particulars of claim are true.

\* I am duly authorised by the claimant to sign this statement

Full name                      Simon Miles

Name of claimant's legal representative's firm                      Edwin Coe LLP

signed  position or office held                      Partner

(Claimant's legal representative)

*\*delete as appropriate*

Simon Miles  
Edwin Coe LLP  
2 Stone Buildings  
Lincoln's Inn  
WC2A 3TH

Claimant's or claimant's legal  
representative's address to which  
documents or payments should be  
sent if different from overleaf including  
(if appropriate) details of DX, fax or e-  
mail.