Electronically Filed
Docket: 24-CCB-0160
Filing Date: 10/25/2025 04:23:05 PM EDT
D Barnes <dan@k9king.com>

Gmail

Just Tap It In/All in the Hips/Price is Wrong Ball Markers - DMCA Counternotices

Cory D. Lapin <Cory@shakedlaw.com> Tue, Jun 20, 2023 at 1:47 PM
To: "dan@k9king.com" <dan@k9king.com>

Good afternoon, Mr. Barnes.

My client, Balanced Co., has just received your DMCA counternotices that you filed with Amazon on June 19, 2023, under penalty of perjury for the Just Tap It In Ball Marker, All in the Hips Ball Marker, and Price is Wrong Ball Marker (ASINs B0BQLWSHG4, B0BQLS8V8N, and B0BQLR5ZP8). Please understand that by doing this, you (1) have now consented to the jurisdiction of the Southern District Court of Florida; and (2) lied under oath that you did not infringe on Balanced Co.'s registered copyright for these designs. We will be filing a lawsuit against you and your business entity for violation of Balanced Co.'s rights. Please note that last time a company chose to do this they had to pay my client $250,000.00 in penalties and attorney's fees for a single violation. In other words, you would likely owe my client at least three times that amount.

Please let this serve as our last offer to you to immediately retract your DMCA counternotices and cease and desist from selling any such products that infringe on my client's copyrights to avoid the need for this litigation. Thank you.

Regards,

Cory D. Lapin, Esq.

Trial Attorney

Shaked Law Firm, P.A.

20900 NE 30th Ave

Suite 715

Aventura, FL 33180

Tel: 305-937-0191

Fax: 305-937-0193

cory@shakedlaw.com

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RE: Just Tap It In/All in the Hips/Price is Wrong Ball Markers - DMCA Counternotices

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Importance: High

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<image001.jpg>

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<image002.jpg>

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image008.jpg
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Gmail D Barnes <dan@k9king.com>

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<image001.jpg>

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<image002.jpg>

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image006.jpg
7K

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Cory D. Lapin <Cory@shakedlaw.com> Mon, Nov 6, 2023 at 1:01 PM
To: "jbreloski@atlawip.com" <jbreloski@atlawip.com>
Cc: D Barnes <dan@k9king.com>

Good afternoon, Jeff.

My client has informed me that K9King continues to sell products that violate my client's intellectual property, namely It's All in the Hips, Price is Wrong, and Just Tap It In copyrights. Please review copyright registration numbers VA0002352323, VA0002352322, and VA0002352325 and confirm that your client will immediately cease and desist any further infringement.

Thank you.

Regards,

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My client, Balanced Co., has just received your DMCA counternotices that you filed with Amazon on June 19, 2023, under penalty of perjury for the Just Tap It In Ball Marker, All in the Hips Ball Marker, and Price is Wrong Ball Marker (ASINs B0BQLWSHG4, B0BQLS8V8N, and B0BQLR5ZP8). Please understand that by doing this, you (1) have now consented to the jurisdiction of the Southern District Court of Florida; and (2) lied under oath that you did not infringe on Balanced Co.'s registered copyright for these designs. We will be filing a lawsuit against you and your business entity for violation of Balanced Co.'s rights. Please note that last time a company chose to do this they had to pay my client $250,000.00 in penalties and attorney's fees for a single violation. In other words, you would likely owe my client at least three times that amount.

Please let this serve as our last offer to you to immediately retract your DMCA counternotices and cease and desist from selling any such products that infringe on my client's copyrights to

avoid the need for this litigation. Thank you.

Regards,

Cory D. Lapin, Esq.

Trial Attorney

Shaked Law Firm, P.A.

20900 NE 30th Ave

Suite 715

Aventura, FL 33180

Tel: 305-937-0191

Fax: 305-937-0193

cory@shakedlaw.com

<image001.jpg>

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www.shakedlaw.com

<image002.jpg>

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image012.jpg
7K

Gmail D Barnes <dan@k9king.com>

Re: Just Tap It In/All in the Hips/Price is Wrong Ball Markers - DMCA Counternotices

Cory D. Lapin <Cory@shakedlaw.com> Sun, Jun 2, 2024 at 2:09 PM
To: "dan@k9king.com" <dan@k9king.com>

Good afternoon, Mr. Barnes. We have initiated litigation against you and K9 King, LLC. Please advise if you will accept service of the complaint or if we need to personally serve you. Thank you.

Regards,

Cory D. Lapin, Esq.

Trial Attorney

Shaked Law Firm, P.A.

20900 NE 30th Ave

Suite 715

Aventura, FL 33180

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From: Cory D. Lapin
Sent: Thursday, June 22, 2023 1:44 PM
To: dan@k9king.com <dan@k9king.com>
Subject: RE: Just Tap It In/All in the Hips/Price is Wrong Ball Markers - DMCA Counternotices

Good afternoon, Mr. Barnes. This is my final follow-up. Please confirm immediately that you have withdrawn your DMCA counternotices and cease and desist from selling any such products that infringe on my client's copyrights to avoid the need for this litigation. Thank you.

Regards,

Cory D. Lapin, Esq.

Trial Attorney

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From: Cory D. Lapin
Sent: Tuesday, June 20, 2023 1:48 PM
To: dan@k9king.com
Subject: Just Tap It In/All in the Hips/Price is Wrong Ball Markers - DMCA Counternotices
Importance: High

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Gmail D Barnes <dan@k9king.com>

RE: Just Tap It In/All in the Hips/Price is Wrong Ball Markers - DMCA Counternotices

Cory D. Lapin <Cory@shakedlaw.com> Tue, Jun 4, 2024 at 9:49 AM
To: "dan@k9king.com" <dan@k9king.com>

Good morning, Mr. Barnes. I am following-up on this. Please let us know if you will accept service via email or if we need to formally serve you. Thank you.

Regards,

Cory D. Lapin, Esq.

Trial Attorney

Shaked Law Firm, P.A.

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From: Cory D. Lapin <Cory@shakedlaw.com>
Sent: Sunday, June 2, 2024 2:09 PM
To: dan@k9king.com
Subject: Re: Just Tap It In/All in the Hips/Price is Wrong Ball Markers - DMCA Counternotices

Good afternoon, Mr. Barnes. We have initiated litigation against you and K9 King, LLC. Please advise if you will accept service of the complaint or if we need to personally serve you. Thank you.

Regards,

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From: Cory D. Lapin
Sent: Thursday, June 22, 2023 1:44 PM
To: dan@k9king.com <dan@k9king.com>
Subject: RE: Just Tap It In/All in the Hips/Price is Wrong Ball Markers - DMCA Counternotices

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From: Cory D. Lapin
Sent: Tuesday, June 20, 2023 1:48 PM
To: dan@k9king.com
Subject: Just Tap It In/All in the Hips/Price is Wrong Ball Markers - DMCA Counternotices
Importance: High

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Regards,

Cory D. Lapin, Esq.

Trial Attorney

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Fax: 305-937-0193

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Gmail D Barnes <dan@k9king.com>

RE: Just Tap It In/All in the Hips/Price is Wrong Ball Markers - DMCA Counternotices

Cory D. Lapin <Cory@shakedlaw.com> Tue, Nov 7, 2023 at 11:17 AM
To: "jbreloski@atlawip.com" <jbreloski@atlawip.com>
Cc: D Barnes <dan@k9king.com>

Good morning, Jeff. Can you please provide me with the list of products across all platforms your client sells? It is my understanding that your client routinely copies my client's designs without its consent.

Regards,

Cory D. Lapin, Esq.

Trial Attorney

Shaked Law Firm, P.A.

20900 NE 30th Ave

Suite 715

Aventura, FL 33180

Tel: 305-937-0191

Fax: 305-937-0193

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From: jbreloski@atlawip.com <jbreloski@atlawip.com>
Sent: Monday, November 6, 2023 3:03 PM
To: Cory D. Lapin <Cory@shakedlaw.com>
Cc: 'D Barnes' <dan@k9king.com>
Subject: RE: Just Tap It In/All in the Hips/Price is Wrong Ball Markers - DMCA Counternotices

Hi Cory,

Thanks for reaching out. Would you please send me the ASINs that allegedly infringe?

Best,

Jeff

Jeffrey T. Breloski
ATLaw*ip* LLC
6000 Summit Pl., No. 6438
Alpharetta, Georgia 30009

Telephone No.: (678) 667-3491

From: Cory D. Lapin <Cory@shakedlaw.com>
Sent: November 6, 2023 1:02 PM
To: jbreloski@atlawip.com
Cc: 'D Barnes' <dan@k9king.com>
Subject: RE: Just Tap It In/All in the Hips/Price is Wrong Ball Markers - DMCA Counternotices
Importance: High

Good afternoon, Jeff.

My client has informed me that K9King continues to sell products that violate my client's intellectual property, namely It's All in the Hips, Price is Wrong, and Just Tap It In copyrights. Please review copyright registration numbers

VA0002352323, VA0002352322, and VA0002352325 and confirm that your client will immediately cease and desist any further infringement.

Thank you.

Regards,

Cory D. Lapin, Esq.

Trial Attorney

Shaked Law Firm, P.A.

20900 NE 30th Ave

Suite 715

Aventura, FL 33180

Tel: 305-937-0191

Fax: 305-937-0193

cory@shakedlaw.com

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Super Lawyers
Cory Lapin
SELECTED IN 2023
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From: Cory D. Lapin
Sent: Friday, June 23, 2023 4:20 PM
To: jbreloski@atlawip.com
Cc: 'D Barnes' <dan@k9king.com>
Subject: RE: Just Tap It In/All in the Hips/Price is Wrong Ball Markers - DMCA Counternotices

Jeff, why is your client re-filing the DMCA counter-notices with Amazon?

Regards,

Cory D. Lapin, Esq.

Trial Attorney

Shaked Law Firm, P.A.

20900 NE 30th Ave

Suite 715

Aventura, FL 33180

Tel: 305-937-0191

Fax: 305-937-0193

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From: Cory D. Lapin
Sent: Thursday, June 22, 2023 5:26 PM
To: jbreloski@atlawip.com
Cc: 'D Barnes' <dan@k9king.com>
Subject: RE: Just Tap It In/All in the Hips/Price is Wrong Ball Markers - DMCA Counternotices

Jeff, please first compare your client's images to my client's images to avoid any unnecessary work. Thank you.

Regards,

Cory D. Lapin, Esq.

Trial Attorney

Shaked Law Firm, P.A.

20900 NE 30th Ave

Suite 715

Aventura, FL 33180

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From: jbreloski@atlawip.com <jbreloski@atlawip.com>
Sent: Thursday, June 22, 2023 5:24 PM
To: Cory D. Lapin <Cory@shakedlaw.com>
Cc: 'D Barnes' <dan@k9king.com>
Subject: FW: Just Tap It In/All in the Hips/Price is Wrong Ball Markers - DMCA Counternotices
Importance: High

Good afternoon, Mr. Lapin,

This firm proudly serves as IP and IP litigation counsel for K9King. We have attempted to contact you multiple times concerning the foregoing issues.

To proceed, explain your infringement contentions -

1. US Copyright registrations for asserted copyright(s)
2. Deposits for each registration
3. How our accused products allegedly infringe
4. The civil action number for your client's $250k award
5. Why were attorney fees awarded in the copyright infringement case

Best regards,

Jeff

Jeffrey T. Breloski

ATLaw*ip* LLC

1265 Stuart Ridge

Johns Creek, Georgia 30022

Telephone No.: (678) 667-3491

Begin forwarded message:

From: "Cory D. Lapin" <Cory@shakedlaw.com>
Date: June 22, 2023 at 1:45:02 PM EDT
To: dan@k9king.com
Subject: RE: Just Tap It In/All in the Hips/Price is Wrong Ball Markers - DMCA Counternotices

Good afternoon, Mr. Barnes. This is my final follow-up. Please confirm immediately that you have withdrawn your DMCA counternotices and cease and desist from selling any such products that infringe on my client's copyrights to avoid the need for this litigation. Thank you.

Regards,

Cory D. Lapin, Esq.

Trial Attorney

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From: Cory D. Lapin
Sent: Tuesday, June 20, 2023 1:48 PM
To: dan@k9king.com
Subject: Just Tap It In/All in the Hips/Price is Wrong Ball Markers - DMCA Counternotices
Importance: High

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Regards,

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<image001.jpg>

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<image002.jpg>

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image007.jpg
7K

Proof of Delivery

I hereby certify that on Saturday, October 25, 2025, I provided a true and correct copy of the EX E - Emails to the following:

PerfectPinz LLC, represented by Cory Lapin, served via ESERVICE at cory@shakedlaw.com

Signed: /s/ Jeffrey T Breloski