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3/19/2026 4:12 PM  
Mariyana T. Spyropoulos  
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Civil Action Cover Sheet – Case Initiation (12/01/20) CCL 0520  
#02329 MWB\rt 2026N-0026

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT - LAW DIVISION**

FRANK THOMAS,  
Plaintiff,  
  
v.  
NIKE, INC., a foreign corporation; et al.,  
Defendants,  
  
and  
NATIONAL BASEBALL HALL OF FAME, et al.,  
Respondents in Discovery.

No. \_\_\_\_\_

**CIVIL ACTION COVER SHEET – CASE INITIATION**

A Civil Action Cover Sheet – Case Initiation shall be filed with the complaint in all civil actions. The information contained herein is for administrative purposes only and cannot be introduced into evidence. Please check the box in front of the appropriate case type which best characterizes your action. Only one (1) case type may be checked with this cover sheet.

Jury Demand  Yes  No

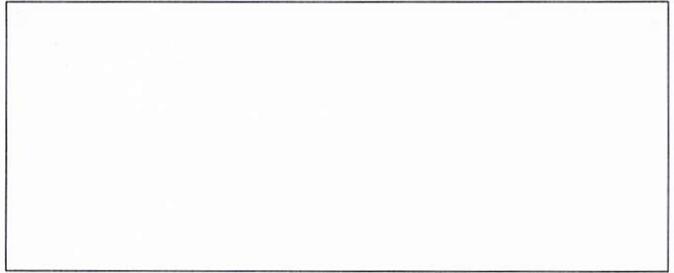
**PERSONAL INJURY/WRONGFUL DEATH**  
CASE TYPES:

- 027 Motor Vehicle
- 040 Medical Malpractice
- 047 Asbestos
- 048 Dram Shop
- 049 Product Liability
- 051 Construction Injuries  
(including Structural Work Act, Road  
Construction Injuries Act and negligence)
- 052 Railroad/FELA
- 053 Pediatric Lead Exposure
- 061 Other Personal Injury/Wrongful Death
- 063 Intentional Tort
- 064 Miscellaneous Statutory Action  
(Please Specify Below\*\*)
- 065 Premises Liability
- 078 Fen-phen/Redux Litigation
- 199 Silicone Implant

**TAX & MISCELLANEOUS REMEDIES**  
CASE TYPES:

- 007 Confession of Judgment
- 008 Replevin
- 009 Tax
- 015 Condemnation
- 017 Detinue
- 029 Unemployment Compensation
- 031 Foreign Transcript
- 036 Administrative Review Action
- 085 Petition to Register Foreign Judgment
- 099 All Other Extraordinary Remedies

By: \_\_\_\_\_  
(Attorney) (Pro Se)



(FILE STAMP)

**COMMERCIAL LITIGATION**  
CASE TYPES:

- 002 Breach of Contract
- 070 Professional Malpractice  
(other than legal or medical)
- 071 Fraud (other than legal or medical)
- 072 Consumer Fraud
- 073 Breach of Warranty
- 074 Statutory Action  
(Please Signify Below\*\*)
- 075 Other Commercial Litigation  
(Please Signify Below\*\*)
- 076 Retaliatory Discharge

**OTHER ACTIONS**  
CASE TYPES:

- 062 Property Damage
- 066 Legal Malpractice
- 077 Libel/Slander
- 079 Petition for Qualified Orders
- 084 Petition to Issue Subpoena
- 100 Petition for Discovery

\*\* Illinois Right of Publicity Act 765 ILCS 1075

Primary Email: ccfiling@corboydemetrio.com

Secondary Email: \_\_\_\_\_

Tertiary Email: \_\_\_\_\_

**Pro Se Only:**  I have read and agree to the terms of the Clerk's Office Electronic Notice Policy and choose to opt in to electronic notice from the Clerk's Office for this case at this email address: \_\_\_\_\_

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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT - LAW DIVISION**

FRANK THOMAS,

Plaintiff,

v.

NIKE, INC., a foreign corporation;  
FANATICS, INC., a foreign corporation;  
FANATICS APPAREL, LLC, a foreign  
limited liability company; and  
CHICAGO WHITE SOX, LTD.,  
an Illinois limited partnership,

Defendants,

and

NATIONAL BASEBALL HALL OF FAME  
AND MUSEUM, INC., a foreign corporation;  
FANATICS, LLC, a foreign limited liability  
company; FANATICS RETAIL GROUP;  
COLLEGIATE LICENSING COMPANY,  
LLC d/b/a LICENSING PARTNERS  
INTERNATIONAL, a foreign limited liability  
company; CHICAGO BULLS LIMITED  
PARTNERSHIP, an Illinois limited  
partnership; DICK'S SPORTING GOODS,  
INC.; MLB SHOP FAN SERVICES;  
MITCHELL & NESS, LLC; PACSUN;  
RALLY HOUSE STORES, INC.; NEW ERA  
CAP; KOHL'S, INC.; NORDSTROM, INC.;  
ACADEMY, LTD., d/b/a ACADEMY  
SPORTS + OUTDOORS; LIDS HOLDINGS,  
INC. d/b/a LIDS SPORTS GROUP; and  
MACYS, INC.,

Respondents in Discovery.

No.

**PLAINTIFF DEMANDS TRIAL BY JURY**

**COMPLAINT AT LAW**

Plaintiff, FRANK THOMAS, by and through his attorneys, Corboy & Demetrio, P.C.,  
complaining of Defendants, NIKE, INC., a foreign corporation, FANATICS, INC., a foreign

corporation, FANATICS APPAREL, LLC, a foreign limited liability company, and CHICAGO WHITE SOX, LTD., an Illinois limited partnership, states:

**COUNT I**

**NIKE, FANATICS, FANATICS APPAREL, WHITE SOX**  
**Illinois Right of Publicity Act (765 ILCS 1075 et seq.)**

1. FRANK THOMAS played professional baseball while wearing uniform number 35 for the WHITE SOX from 1990 to 2005 and, on February 12, 2010, signed a one-day contract with the WHITE SOX and formally announced his retirement.

2. FRANK THOMAS achieved significant professional success as a Major League Baseball player and was regarded as one of the leading players of his era, bringing substantial recognition to himself and the WHITE SOX and was inducted into the National Baseball Hall of Fame in 2014.

3. At all relevant times, the WHITE SOX has been a professional baseball franchise competing in Major League Baseball and headquartered in Chicago, Cook County, Illinois.

4. At all relevant times, NIKE, FANATICS, FANATICS APPAREL, and the WHITE SOX engaged in a joint venture to design, manufacture, market, distribute, offer for sale, and sell jerseys and related merchandise bearing WHITE SOX and NIKE branding.

5. The right to control and to choose whether and how to use an individual's identity for commercial purposes is recognized as each individual's right of publicity. 765 ILCS 1075/10.

6. At all relevant times, FRANK THOMAS's commercial identity was extremely valuable and, as such, he exercised control over its usage in various ways, including, but not limited to, trademarking his "Big Hurt" moniker.

7. Without his agreement or consent, NIKE, FANATICS, FANATICS APPAREL, and the WHITE SOX profited by selling items using FRANK THOMAS's identity for their own commercial purposes.

8. Among the merchandise designed, manufactured, marketed, distributed, offered for sale, and sold by NIKE, FANATICS, FANATICS APPAREL, and the WHITE SOX were uniforms and jerseys bearing FRANK THOMAS's name, number, and/or identity, including, but not limited to, the "City Connect 2.0" jersey.

9. On or about April 28, 2025, and continuing thereafter, NIKE, FANATICS, FANATICS APPAREL, and the WHITE SOX designed, manufactured, marketed, distributed, offered for sale, and sold such jerseys, including, but not limited to, the "City Connect 2.0" jersey bearing the number "35" on the front and the name "THOMAS" and the number "35" on the back, together with WHITE SOX trademarks, logos, and branding, as well as NIKE branding:



Figure 1 – Men's City Connect 2.0 Jersey Online Listing Photo



Figure 2 – Women's City Connect 2.0 Jersey Online Listing Photo

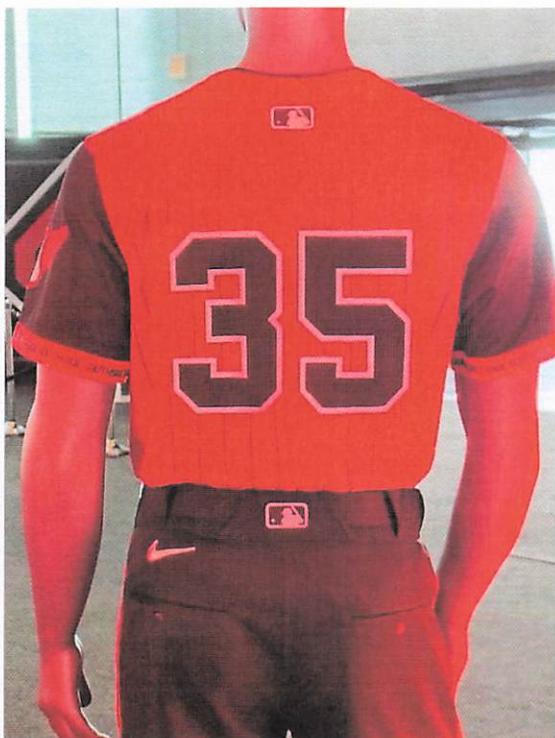


Figure 3 – Photo of a #35 City Connect 2.0 Jersey that was prominently displayed on a mannequin at the White Sox Team Store at Rate Field

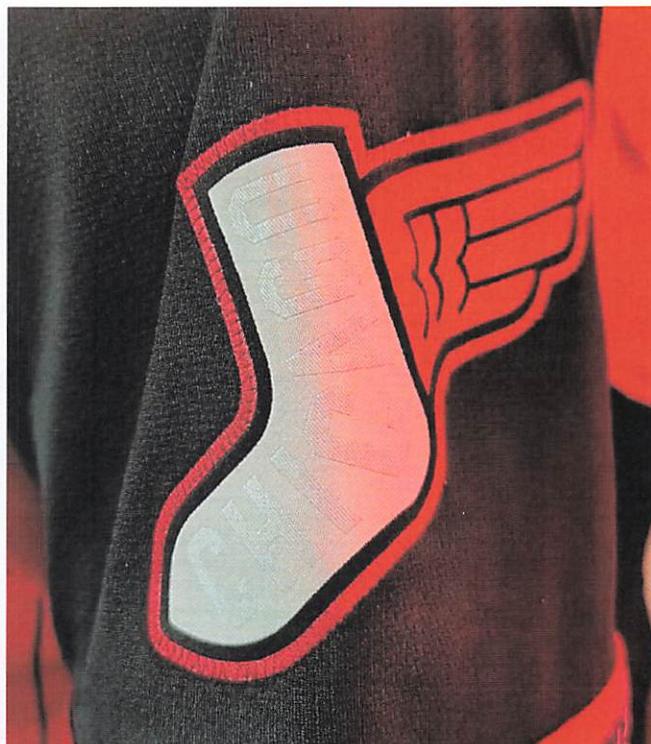


Figure 4 – Photo of White Sox/Chicago Bulls branding on the City Connect 2.0 Jersey

10. At all relevant times, through the sale of the aforementioned merchandise, NIKE, FANATICS, FANATICS APPAREL, and the WHITE SOX were unjustly enriched through substantial commercial benefits from purchasers of the "City Connect 2.0" jersey, including, but not limited to, revenues, profits, royalties, marketability, and increased commercial goodwill.

11. On or about April 28, 2025, and continuing thereafter, NIKE, FANATICS, FANATICS APPAREL, and the WHITE SOX appropriated FRANK THOMAS's name and likeness in one or more of the following ways:

- a. Designing, manufacturing, marketing, offering for sale, and selling jerseys bearing the name "THOMAS" and the number "35," or other markings which uniquely identify FRANK THOMAS, directly or by implication;
- b. Promoting and advertising such jerseys through digital, online, and other commercial channels;
- c. Incorporating FRANK THOMAS's name and uniform number in connection with WHITE SOX and NIKE branding to promote and increase sales of merchandise; and
- d. Commercially exploiting the goodwill associated with FRANK THOMAS's professional baseball career to enhance the marketability of NIKE, FANATICS, FANATICS APPAREL, and WHITE SOX merchandise.

12. At all relevant times, no contract existed between NIKE, FANATICS, FANATICS APPAREL, the WHITE SOX and FRANK THOMAS.

13. At all relevant times, NIKE, FANATICS, FANATICS APPAREL, and the WHITE SOX's appropriation of FRANK THOMAS's name and likeness was undertaken for commercial purposes.

14. At all relevant times, NIKE, FANATICS, FANATICS APPAREL, and the WHITE SOX's appropriation of FRANK THOMAS's name and likeness was without his consent, in violation of the Illinois Right of Publicity Act, 765 ILCS 1075/30.

15. FRANK THOMAS has received no compensation or other consideration from either NIKE, FANATICS, FANATICS APPAREL, or the WHITE SOX for such use of his name and likeness.

16. NIKE, FANATICS, FANATICS APPAREL, and the WHITE SOX's retention of the aforementioned benefits without obtaining FRANK THOMAS's consent also violates fundamental principles of justice, equity, good conscience, and fair play.

17. As a proximate result of NIKE, FANATICS, FANATICS APPAREL, and the WHITE SOX's appropriation of FRANK THOMAS's name and likeness without his consent, FRANK THOMAS suffered economic detriment, including, but not limited to, the disgorgement of profits and other benefits unjustly obtained by Defendants, loss of licensing revenue, and economic value associated with controlling the commercial use of his name and likeness.

WHEREFORE, Plaintiff, FRANK THOMAS, demands judgment against Defendants, NIKE, INC., a foreign corporation, FANATICS, INC., a foreign corporation, FANATICS APPAREL, LLC, a foreign limited liability company, and CHICAGO WHITE SOX, LTD., an Illinois limited partnership, for any and all remedies available, including, but not limited to, a sum of money in excess of fifty-thousand dollars (\$50,000), attorneys fees and expenses pursuant to 765 ILCS 1075/55, as well as punitive damages pursuant to 765 ILCS 1075/40.

## COUNT II

### **Respondents in Discovery**

It is believed that NATIONAL BASEBALL HALL OF FAME AND MUSEUM, INC., a foreign corporation; FANATICS, LLC, a foreign limited liability company; FANATICS RETAIL GROUP; COLLEGIATE LICENSING COMPANY, LLC d/b/a LICENSING PARTNERS INTERNATIONAL, a foreign limited liability company; CHICAGO BULLS LIMITED PARTNERSHIP, an Illinois limited partnership; DICK'S SPORTING GOODS, INC.; MLB SHOP

FAN SERVICES; MITCHELL & NESS, LLC; PACSUN; RALLY HOUSE STORES, INC.; NEW ERA CAP; KOHL'S, INC.; NORDSTROM, INC.; ACADEMY, LTD., d/b/a ACADEMY SPORTS + OUTDOORS; LIDS HOLIDNGS, INC. d/b/a LIDS SPORTS GROUP; and MACYS, INC., may have information as to whom, if anyone, should be named as additional defendants in this action.

CORBOY & DEMETRIO, P.C.



By: \_\_\_\_\_  
Thomas A. Demetrio

Thomas A. Demetrio  
William T. Gibbs  
Mitchell W. Bild  
**Corboy & Demetrio, P.C.**  
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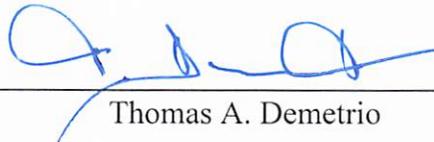
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No.

**JURY DEMAND**

The undersigned hereby demands trial by jury.



Thomas A. Demetrio

Thomas A. Demetrio  
William T. Gibbs  
Mitchell W. Bild  
CORBOY & DEMETRIO, P.C.  
Attorneys for Plaintiff  
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Defendants,

and

NATIONAL BASEBALL HALL OF FAME  
AND MUSEUM, INC., a foreign corporation;  
et al.,

Respondents in Discovery.

No.

**AFFIDAVIT**

I, THOMAS A. DEMETRIO, state under oath:

1. I am one of the attorneys associated with Corboy & Demetrio, P.C., responsible for filing the Complaint at Law in this matter.
2. The total of money damages sought by plaintiff does exceed \$50,000.00, exclusive of interest and costs.

CORBOY & DEMETRIO, P.C.  
By: Thomas A. Demetrio

SUBSCRIBED and SWORN to before me this  
18<sup>th</sup> day of March, 2026.

NOTARY PUBLIC



Thomas A. Demetrio  
William T. Gibbs  
Mitchell W. Bild  
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