

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 21-62119-CIV-HUCK**

OMEGA SA, *et al.*

Plaintiffs,

vs.

COPYOMEGAWATCHES.CO, *et al.*

Defendants.

/

STATUS REPORT

Plaintiffs Omega SA, Blancpain SA, Compagnie des Montres Longines, Francillon S.A., Glashütter Uhrenbetrieb GmbH, Hamilton International AG, Montres Breguet S.A., Rado Uhren AG, and Tissot SA (collectively “Plaintiffs”), hereby submit the following Status Report.

1. On October 12, 2021, Plaintiffs filed their Complaint against the Defendants identified on Schedule “A” thereto.
2. On October 20, 2021, the Court held a Status Conference and inquired about the relationship between the Defendants in action.¹
3. Based solely upon publicly available data, Plaintiffs are able to conclusively demonstrate that, at least, the Defendants identified on Schedule “1” hereto (the “Group 1 Defendants”),² are directly related and operating as a single, multi-pronged entity engaged in the distribution and sales of counterfeit watches bearing each of Plaintiffs’ trademarks. Specifically, Plaintiffs identified several publicly available common data points between the Group 1 Defendants, including but not limited to, (1) redirection between domain names; (2) common

¹ On October 20, 2021, the Court also entered an Order Granting Motion for Alternate Service, authorizing Plaintiffs to serve Defendants via e-mail and website posting.

² The Group 1 Defendants are comprised of 49 Defendants and 101 Domain Names.

Internet Protocol addresses (“IP address”),³ (3) common email addresses, (4) common telephone numbers, and (5) common bank account data. A chart illustrating the connections between each of the Defendants and their Subject Domain Names is attached hereto as Exhibit “1”.⁴ A partial summary of the salient points of chart is as follows:

- Redirection between domain names: 68 of the domain names are connected to seventeen of the Group 1 Defendants through redirection of one or more their domain names to one of their e-commerce websites, as outlined in the table on Schedule “2” below.
- Common IP Address: 36 of the 49 Defendants are using the common IP Addresses 167.160.19.218, 162.222.88.122–172, and/or 23.252.66.233-26. Specifically, Defendant Numbers 7, 8, 20, 28, 38, 40, 55, 67, 69, 74, 79, 83, 86, 104, 115, 123, 124, 150, 158, 176, and 195 share the IP Address 167.160.19.218; Defendant Numbers 19, 65, 76, 86, 90, 120, 121, 126, 127, 174, and 198 share the IP Address 162.222.88.122–172; and Defendant Numbers 8, 20, 27, 40, 42, 52, 55, 67, 74, 77, 82, and 83 share the IP Address 23.252.66.233-26. These overlapping groups are connected by Defendant Numbers 8, 20, 40, 55, 67, 74, and 83 which utilize both

³ An IP Address is a numeric identifier that directs a computer where to find a specific server. Common IP address are not always indicative of a connection between websites, as it is possible that domains are hosted on large commercial servers which leases space to thousands of websites, none of which are necessarily related. However, in cases where only a small number of websites are hosted on a server, or in cases where sites are hosted on servers with sequential numbers, there is a strong likelihood that these sites are connected, as the hosting servers are either privately owned or exclusively leased servers.

⁴ Plaintiffs reasonably believe they will be able to demonstrate multiple additional intersections between the Group 1 Defendants and the additional originally named Defendants through discovery.

167.160.19.218 and 23.252.66.233-26, and Defendant Number 86, which utilizes both 167.160.19.218 and 162.222.88.122-172.

- Common Email Addresses: the remaining 13 Defendants, as well as other Group 1 Defendants provide the contact e-mail addresses watchesinhot@gmail.com, jumpwatch@gmail.com, majun8030@hotmail.com, okreplicasale@gmail.com, hellook_sally@hotmail.com, timepiecebuy@gmail.com, and younebag@gmail.com. Specifically, Defendant Numbers 7, 8, 27, 55, 62, 65, 67, 76, 86, 89, 91, 123, and 176 use the contact e-mail address, watchesinhot@gmail.com; Defendant Numbers 15, 91, 124, and 178 share the same contact e-mail address jumpwatch@gmail.com; Defendant Numbers 124 and 178 share the same contact e-mail address majun8030@hotmail.com; Defendant Numbers 40, 42, and 178 share the same contact e-mail address okreplicasale@gmail.com; Defendant Numbers 220, 28, 42, and 178 share the same contact e-mail address hellook_sally@hotmail.com, Defendant Numbers 5, 30, 56, 79, 90, 98, 120, 121, 126, 127, 156, 167, 168, 174, 182, and 198 share the same contact email address timepiecebuy@gmail.com, and Defendant Numbers 8 and 55 share the same contact e-mail address younebag@gmail.com. These overlapping groups are connected by Defendant Number 178, which uses the contact e-mail addresses jumpwatch@gmail.com, majun8030@hotmail.com, hellook_sally@hotmail.com, and okreplicasale@gmail.com; Defendant 91, which uses the contact e-mail addresses watchesinhot@gmail.com and jumpwatch@gmail.com; Defendant Number 124, which uses the e-mail addresses jumpwatch@gmail.com and majun8030@hotmail.com, and Defendant Number 42, which uses the e-mail

addresses, hellook_sally@hotmail.com and okreplicasale@gmail.com, and Defendant Numbers 8 and 55, which use the contact e-mail addresses watchesinhot@gmail.com and younebag@gmail.com.

- Common Bank Account Data and Telephone Number: several Group 1 Defendants share the same telephone number and payment data. Specially, Defendant numbers 5, 7, 8, 20, 27, 55, 62, 65, 67, 79, 82, 90, 91, 126, 150, 176 share the same customer service telephone number 8615876530281, and the Group 1 Defendant Numbers 7, 8, 27, 62, 65, 79, 86, 91, 126, 176 provide identical bank account data for finalizing payment, including the payee Mei Jun, and the bank account ending ***2137.

4. The Group 1 Defendants' aggregated unlawful activities are causing a single, indivisible harm to Plaintiffs. Moreover, because the Group 1 Defendants' infringing and counterfeiting activities are all emanating from the same interrelated websites, Plaintiffs are seeking nearly identical injunctive relief against each Group 1 Defendant, namely, the redirection and ultimate transfer of the domain names in question so the ongoing infringement may be terminated.

5. Because Plaintiffs' have proven the direct relationship of the Group 1 Defendants, Plaintiffs have requested the clerk issue summonses as to these Defendants so this action may move forward.

6. Additionally, based upon the publicly available data, Plaintiffs reasonably believe that the remaining Defendants named in this action are likely also directly or indirectly related to the Group 1 Defendants. Specifically, Plaintiffs' initial examination of all of the named Defendants' website structures and related registration and hosting data reflects significant overlap between the Defendants that is unlikely to be random or merely coincidental, and more

likely than not, a result of the fact that this is a small organization of distributors and redistributors who are logically and factually connected in their infringing activities. However, due to the surreptitious and anonymous manner in which Defendants conduct their business Plaintiffs cannot conclusively prove that relationship without conducting third party discovery related to CloudFlare, Name.com, Namesilo.com, Namecheap.com, and Western Union.

7. The totality of the connections, including the sharing of content sources and the interconnection of the domain names and underlying websites themselves, demonstrates a likelihood that Defendants are not unrelated, but, rather, part of the same network engaged in the distribution and sales of counterfeit versions of Plaintiffs' branded watches. Accordingly, upon service of the Group 1 Defendants, Plaintiffs will also request a Rule 26(f) conference and, thereafter, initiate the necessary discovery to conclusively prove the relationship between the Group 1 Defendants and the remaining named Defendants. Plaintiffs will not draw summonses and conduct service as to any additional Defendants prior to presenting such conclusive evidence to the Court in a supplemental status report.

WHEREFORE, Plaintiffs respectfully submit to the Court Plaintiffs' Status Report concerning this action.

DATED: November 3, 2021.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **Virgilio Gigante/**

Stephen M. Gaffigan (Fla. Bar No. 025844)

Virgilio Gigante (Fla. Bar No. 082635)

T. Raquel Wiborg-Rodriguez (Fla. Bar No. 103372)

401 East Las Olas Blvd., #130-453

Ft. Lauderdale, Florida 33301

Telephone: (954) 767-4819

E-mail: stephen@smgpa.net

E-mail: leo@smgpa.net

E-mail: raquel@smgpa.net

Attorneys for Plaintiffs

SCHEDULE "1"
DEFENDANTS BY NUMBER AND SUBJECT DOMAIN NAME

Defendant Number	Defendant / Domain Name
5	luxurylongines.com
5	bestclock.cn
5	hotreplicas.net
7	omegachat.me
8	omegasweden.org
8	dreampanerai.com
8	exactreplica.net
8	fakeswiss.com
8	mrepwatches.com
8	paywatches.net
8	watchocean.net
15	top10omega.com
19	aaaforum24.com
19	watchesprouk.com
20	aaa-replica.com
20	cryo-watch.com
20	hellorolex.so
20	hqreplicas.com
20	luxpanerai.com
20	nurrawatches.com
20	payreplicawatch.com
20	repswatch.org
20	sitewatches.com
20	uswisssale.net
27	amazingclock.org
28	anyswisswatch.net
28	cheapestreplicas.com
28	cheapukwatch.com
28	clockswatch.com
28	coswatch.org
28	enwatch.org
28	swissmall.biz
30	apwatchchat.com
30	bestintimes.me
38	bassreplica.com
40	bestenuhren.net

40	bestenuhrens.com
40	detimer.net
40	linkpops.net
40	voila-uhren.de
42	bestreplica.me
42	okreplicawatch.com
52	billigeklokker.com
55	chargewatch.net
55	emyoku.com
55	farleftwatch.org
55	multiluxury.com
55	replica-watch.net
55	taywatches.com
55	watchindiscount.com
55	watchpig.com
56	chattimes.me
62	chopardforum.com
65	cinwatches.me
67	clocktowerss.com
67	kuvarsit.co
67	replicaukonline.com
67	rmskull.com
69	cmblogwatch.net
69	menwatchessell.com
74	dilusotime.com
74	italiaperfette.com
74	yoorologi.it
76	dpanwatch.com
77	e-efore.com
79	fakewatch.co
79	rolexforsale.me
82	faussefr.com
82	luxerepliquesmontre.com
83	findbestwatch.net
83	replica4luxury.net
83	replicapro.com
86	gradeclonewatch.com
86	innotizen.com
86	proswisswatch.net
89	holapanerai.me
90	holatime.me

91	hollywatches.org
98	ireplicas.com
104	luxuryreplicawatch.com
115	okfakewatches.com
120	parsin.me
121	perfake.me
123	popwatch.org
123	tswatches.me
124	ppfake.net
126	puretime03.me
127	puretimes.me
150	repsswiss.com
150	usjaeger.com
150	watchesclocks.me
156	skytime.biz
158	swetawatch.org
167	timepiecebuy.org
168	timereps.org
174	tttime.co
176	usreplicas.com
178	vreplicawatches.com
182	watchesgentian.com
195	watchma.me
198	zowatch.com

SCHEDULE “2”

Defendant Number	Defendant’s Redirecting Domain Names	Defendant’s E-commerce Domain Name
5	hotreplicas.net	bestclock.cn
	luxurylongines.com	
8	dreampanerai.com	paywatches.net ⁵
	exactreplica.net	
	fakeswiss.com	
	mrepwatches.com	
	omegasweden.org	
	watchocean.net	
19	aaaforum24.com	watchesprouk.com
20	aaa-replica.com	hellorolex.so ⁶
	cryo-watch.com	
	hqreplicas.com	
	luxpanerai.com	
	nurrawatches.com	
	payreplicawatch.com	
	repwatch.org	
	sitewatches.com	
	uswisssale.net	
28	anyswisswatch.net	clockswatch.com ⁷
	cheapestreplicas.com	
	cheapukwatch.com	
	coswatch.org	
	enwatch.org	
	swissmall.biz	
30	apwatchchat.com	bestintimes.me ⁸
40	bestenuhren.net	
	bestenuhrens.com	

⁵ Since the filing of Plaintiffs’ Complaint, Plaintiffs’ have discovered that Defendant Number 8 set up a new redirect so that its domain names now redirect to the new domain name, paywatches.me.

⁶ Since the filing of Plaintiffs’ Complaint, Plaintiffs’ have discovered that Defendant Number 20 set up a new redirect so that its domain names now redirect to the new domain name, hellorolexwatch.com.

⁷ Since the filing of Plaintiffs’ Complaint, Plaintiffs’ have discovered that Defendant Number 28 set up a new redirect so that its domain names now redirect to the new domain name, clockwatchessale.com.

⁸ Since the filing of Plaintiffs’ Complaint, Plaintiffs’ have discovered that Defendant Number 30 set up a new redirect so that its domain names now redirect to the new domain name, bestintimes.com.

	detimer.net	voila-uhren.de ⁹
	linkpops.net	
42	bestreplica.me	okreplicawatch.com ¹⁰
55	chargewatch.net	taywatches.com ¹¹
	emyoku.com	
	farleftwatch.org	
	multiluxury.com	
	replica-watch.net	
	watchindiscount.com	
67	watchpig.com	kuvarsit.co ¹²
	clocktowerss.com	
	replicaonline.com	
69	rmskull.com	
69	menwatchessell.com	cmblogwatch.net ¹³
74	dilussotime.com	yoorologi.it ¹⁴
	italiaperfette.com	
79	fakewatch.co	rolexforsale.me ¹⁵

⁹ Since the filing of Plaintiffs' Complaint, Plaintiffs' have discovered that Defendant Number 40 set up a new redirect so that its domain names now redirect to the new domain name, replicakaufen.de.

¹⁰ Since the filing of Plaintiffs' Complaint, Plaintiffs' have discovered that Defendant Number 42 set up a new redirect so that its domain names now redirect to the new domain name, ok-replica.net.

¹¹ Since the filing of Plaintiffs' Complaint, Plaintiffs' have discovered that Defendant Number 55 set up a new redirect so that its domain names now redirect to the new domain name, dermowatch.org.

¹² Since the filing of Plaintiffs' Complaint, Plaintiffs' have discovered that Defendant Number 67 set up a new redirect so that its domain names now redirect to the new domain name, kuvarsitwatches.com.

¹³ Defendant Number 69's domain name, menwatchessell.com, also redirected to Defendant Number 55's domain name, taywatches.com. Further, since the filing of Plaintiffs' Complaint, Plaintiffs' have discovered that Defendant Number 69 set up a new redirect so that its domain names now redirect to the new domain name, replicatopwatches.com.

¹⁴ Since the filing of Plaintiffs' Complaint, Plaintiffs' have discovered that Defendant Number 74 set up a new redirect so that its domain names now redirect to the new domain name falsiorologi.it.

¹⁵ Since the filing of Plaintiffs' Complaint, Plaintiffs' have discovered that Defendant Number 79 set up a new redirect so that its domain names now redirect to the new domain name rolexforsale.co.

82	faussefr.com	luxerepliquesmontre.com ¹⁶
83	findbestwatch.net	replica4luxury.net ¹⁷
	replicapro.com	
86	innotizen.com	gradeclonewatch.com ¹⁸
	proswisswatch.net	
123	popwatch.org	tswatches.me ¹⁹
150	repsswiss.com	watchesclocks.me ²⁰
	usjaeger.com	

¹⁶ Since the filing of Plaintiffs' Complaint, Plaintiffs' have discovered that Defendant Number 82 set up a new redirect so that its domain names now redirect to the new domain name okrepliquemontre.com.

¹⁷ Since the filing of Plaintiffs' Complaint, Plaintiffs' have discovered that Defendant Number 83 set up a new redirect so that its domain names now redirect to the new domain name copyluxurywatch.com.

¹⁸ Since the filing of Plaintiffs' Complaint, Plaintiffs' have discovered that Defendant Number 86 set up a new redirect so that its domain names now redirect to the new domain name perfect-clones.com.

¹⁹ Since the filing of Plaintiffs' Complaint, Plaintiffs' have discovered that Defendant Number 123 set up a new redirect so that its domain names now redirect to the new domain name tswatchesltd.com.

²⁰ Since the filing of Plaintiffs' Complaint, Plaintiffs' have discovered that Defendant Number 150 set up a new redirect so that its domain names now redirect to the new domain name topswissclock.com.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 3, 2021, a true copy of the foregoing was served upon Defendants via the e-mail accounts provided by Defendants as part of the domain registration records for each of their respective domain names, including service via registrar, or on the Internet websites operating under each of their respective corresponding domain names, including customer service e-mail addresses and onsite contact forms, and by posting copies on Plaintiffs' website appearing at the URL <http://servingnotice.com/Qs3o12/index.html>.

Virgilio Gigante
Virgilio Gigante