

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 21-62119-CIV-HUCK

OMEGA SA, *et al.*

Plaintiff,

vs.

COPYOMEGAWATCHES.CO, *et al.*

Defendants.

FINAL DEFAULT JUDGMENT AND PERMANENT INJUNCTION

THIS CAUSE came before the Court on Plaintiffs' Motion for Entry of Final Default Judgment Against Defendants [ECF No. 23] (the "Motion"). The Court has carefully considered the Motion, the entire court file and is otherwise fully advised in the premises that the Plaintiffs have properly served Defendants pursuant to the Court's Order granting Motion for Alternative Service [ECF No. 7], and that the Clerk of the Court entered a default against Defendants on January 18, 2022 [ECF No. 21]. Accordingly, it is hereby

ORDERED that judgment is entered in favor of 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 ("Plaintiffs") and against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule "A" hereto ("Defendants"), on all Counts of the Complaint as follows:

(1) Permanent Injunctive Relief:

Defendants, their officers, directors, employees, agents, subsidiaries, distributors, and all persons in active concert or participation with them are hereby permanently restrained and enjoined from

- a. manufacturing or causing to be manufactured, importing, advertising, or promoting, distributing, selling or offering to sell counterfeit and infringing goods bearing Plaintiffs' trademarks identified in Paragraphs 25, 31, 37, 43, 49, 55, 61, and 67 of the Complaint [ECF No. 1] ("Plaintiffs' Marks");
- b. using Plaintiffs' Marks in connection with the sale of any unauthorized goods;
- c. using any logo, and/or layout which may be calculated to falsely advertise the services or products of Defendants as being sponsored by, authorized by, endorsed by, or in any way associated with Plaintiffs;
- d. falsely representing themselves as being connected with Plaintiffs, through sponsorship or association;
- e. engaging in any act which is likely to falsely cause members of the trade and/or of the purchasing public to believe any goods or services of Defendants are in any way endorsed by, approved by, and/or associated with Plaintiffs;
- f. using any reproduction, counterfeit, copy, or colorable imitation of Plaintiffs' Marks in connection with the publicity, promotion, sale, or advertising of any goods sold by Defendants;

- g. affixing, applying, annexing or using in connection with the sale of any goods, a false description or representation, including words or other symbols tending to falsely describe or represent goods offered for sale or sold by Defendants as being those of Plaintiffs or in any way endorsed by Plaintiffs;
- h. otherwise unfairly competing with Plaintiffs;
- i. using Plaintiffs' Marks, or any confusingly similar trademarks, within domain name extensions, metatags or other markers within website source code, from use on any webpage (including as the title of any web page), from any advertising links to other websites, from search engines' databases or cache memory, and from any other form of use of such terms which is visible to a computer user or serves to direct computer searches to websites registered by, owned, or operated by Defendants; and
- j. effecting assignments or transfers, forming new entities or associations or utilizing any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth above.

(2) Additional Equitable Relief:

- a. In order to give practical effect to the Permanent Injunction, the domain names identified on Schedule "A" hereto ("Subject Domain Names") are hereby ordered to be, within a reasonable time, not to exceed **five (5) business days**, transferred by Defendants, their assignees and/or successors in interest or title, and the Registrars to Plaintiffs' control. To the extent the current Registrars do not facilitate the transfer of the Subject

Domain Names to Plaintiffs' control within five (5) business days of receipt of this Judgment, upon Plaintiffs' request, the top level domain (TLD) Registry for each of the Subject Domain Names, or their administrators, including backend registry operators or administrators, **SHALL, within thirty (30) days**, (i) change the Registrar of Record for the Subject Domain Names to a Registrar of Plaintiffs' choosing, and that Registrar shall transfer the Subject Domain Names to Plaintiffs, or (ii) place the Subject Domain Names on Registry Hold status for the life of the current registration, thus removing them from the TLD zone files maintained by the Registries which link the Subject Domain Names to the IP addresses where the associated websites are hosted;

- b. Defendants, their agent(s) or assign(s), **SHALL** assign all rights, title, and interest, to their Subject Domain Name(s) to Plaintiffs and, if within a reasonable time, not to exceed **five (5) business days**, of receipt of this Order Defendants fail to make such an assignment, the Court shall order the act to be done by another person appointed by the Court at Defendants' expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a); and
- c. Defendants, their agent(s) or assign(s), **SHALL** instruct all search engines to permanently delist or deindex their Subject Domain Name(s) and, if within a reasonable time, not to exceed **five (5) business days**, of receipt of this Order Defendants fail to make such a written instruction, the Court shall order the act to be done by another person appointed by the Court at

Defendants' expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a)

(3) Statutory damages in favor of Plaintiffs pursuant to 15 U.S.C. § 1117(c) are determined to be to be \$10,000.00 against each Defendant, for which let execution issue based upon the Court's finding that the Defendants infringed at least one trademark on one type of good. The award amounts fall within the permissible statutory range of 15 U.S.C. § 1117(c):

(4) Statutory damages in favor of Plaintiff pursuant to 15 U.S.C. 1117(d) are determined to be:

- a. \$10,000.00 against Defendant Number 5, luxurylongines.com, for its domain name, luxurylongines.com, for which let execution issue;
- b. \$10,000.00 against Defendant Number 7, omegachat.me, for its domain name, omegachat.me, for which let execution issue;
- c. \$10,000.00 against Defendant Number 8, omegasweden.org, for its domain name, omegasweden.org, for which let execution issue;
- d. \$10,000.00 against Defendant Number 15, top10omega.com, for its domain name, top10omega.com, for which let execution issue.

(5) Interest from the date this action was filed shall accrue at the legal rate. *See* 28 U.S.C. § 1961.

(6) The bond posted by Plaintiff in the amount of \$10,000.00 is ordered to be released by the Clerk.

(7) This Court will retain jurisdiction to enforce this Judgment and permanent injunction.

(8) The Clerk shall **CLOSE** this case.

DONE AND ORDERED in Miami, Florida, on _____, 2022.

PAUL C. HUCK
SENIOR UNITED STATES DISTRICT JUDGE

cc: counsel of record via email

SCHEDULE “A”
DEFENDANT BY NUMBER AND SUBJECT DOMAIN NAME

Defendant Number	Defendant / Subject 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	replicaonline.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