

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.

**DECLARATION OF ANTOINE HALLER IN SUPPORT OF PLAINTIFFS' MOTION
FOR ENTRY OF FINAL DEFAULT JUDGMENT AGAINST DEFENDANTS**

I, Antoine Haller, declare and state as follows:

1. I am over 18 years of age and have personal knowledge of the facts set forth herein. I make this Declaration, which is filed in support of Plaintiffs' Motion for Entry of Final Default Judgment Against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule "A" hereto (collectively "Defendants"). If called upon to do so, I could and would testify competently to the following facts set forth below.



2. I am employed by The Swatch Group Ltd. (the "Swatch Group") as Anti-Counterfeiting Officer in the Legal Department. Plaintiffs Omega SA ("Omega"), Blancpain SA ("Blancpain"), Compagnie des Montres Longines, Francillon S.A. ("Longines"), Glashütter Uhrenbetrieb GmbH ("Glashütte Original"), Hamilton International AG ("Hamilton"), Montres Breguet S.A. ("Breguet"), Rado Uhren AG ("Rado"), and Tissot SA ("Tissot") (collectively "Plaintiffs") are subsidiaries of The Swatch Group Ltd.

3. In my capacity as Anti-Counterfeiting Officer in the Legal Department, I am responsible for trademarks and other intellectual property rights enforcement and anti-counterfeiting efforts notably in connection with Internet related matters throughout the world.

As a result, I have been trained to identify the distinctions between Plaintiffs' genuine merchandise and non-genuine, counterfeit copies of the same.

Omega's Rights

4. Omega is the owner of the following trademarks, which are valid and registered on the Principal Register of the United States Patent and Trademark Office (the "Omega Marks"):

Trademark	Registration Number	Registration Date	Class / Goods
SEAMASTER	556,602	March 25, 1952	IC 014. Watches, watch parts and watch movements.
OMEGA	566,370	November 4, 1952	IC 014. Watches and parts thereof.
	578,041	July 28, 1953	IC 014. Watches (including pocket watches, wrist watches with or without straps, bands or bracelets, pendant watches, calendar watches, and stopwatches) either stem-wind or automatic; clocks; chronometers, chronographs, and parts for all of the foregoing.
SPEEDMASTER	672,487	January 13, 1959	IC 014. Watches and clocks.
	734,891	July 24, 1962	IC 014. Timepieces and Parts Thereof.
CONSTELLATION	1,223,349	January 11, 1983	IC 014. Watches and parts thereof.
DE VILLE	1,309,929	December 18, 1984	IC 014. Watches, Wrist Watches, Portfolio Watches, Pendant Watches, and Miniature Clocks; and Parts Thereof.
PLANET OCEAN	3,085,659	April 25, 2006	IC 014. Watches and watch parts.
AQUA TERRA	4,299,644	March 12, 2013	IC 014. Watches, watch straps, watch bracelets and parts thereof, chronometers, chronographs for use as watches, watches made of precious metals, watches partly or entirely set with precious stones.
CO-AXIAL	4,442,192	December 3, 2013	IC 014. Horological and chronometric instruments.

The Omega Marks are used in connection with the manufacture and distribution of high-quality goods in the category identified above. True correct copies of the Certificates of Registration for the Omega Marks are attached to the Complaint as Exhibit “1.”

5. Omega is engaged in the promotion, distribution, and sale of high-quality products in the United States and worldwide under the Omega Marks.

6. For many years, Omega has used the Omega Marks in connection with the marketing and sale of Omega’s high-quality products in the United States.

7. Genuine Omega products are marketed and sold throughout the United States at Omega boutiques, at Tourbillon Boutiques, owned by The Swatch Group Les Boutiques Ltd. an affiliated company of the Swatch Group, at select and prestigious retailers, and via the Internet.

8. During the time that Omega products have been sold in interstate commerce under the Omega Marks, Omega has expended significant monetary resources to extensively advertise and promote products under the Omega Marks in magazines, newspapers, in stores, on the Internet and in other media worldwide, including the official Omega website, www.omegawatches.com. In the last five years alone, The Swatch Group’s sales of watches and other goods, including for Omega, have been well into the many millions of dollars.

9. As a result of the foregoing, the Omega Marks have acquired fame in the consumer market for a wide variety of products, including watches.

10. The Omega Marks are widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as identifiers of high-quality goods.


11. The Omega Marks have come to symbolize the enormous goodwill of Omega’s business throughout the United States and the world.

12. The Omega Marks have never been abandoned. Omega actively polices and enforces its trademark rights.

13. The Omega Marks are vital to Omega's business, as the Marks represent a significant value to the company and its associated image. Omega suffers irreparable harm to its goodwill, as well as a direct monetary loss, any time any third parties, including Defendants, sell counterfeit and infringing goods bearing an identical or substantially similar trademarks.

Blancpain's Rights

14. Blancpain is the owner of the following trademarks, which are valid and registered on the Principal Register of the United States Patent and Trademark Office (the "Blancpain Marks"):

Trademark	Registration Number	Registration Date	Class / Goods
<i>Fifty Fathoms</i>	661,036	April 29, 1958	IC 014. Mechanical watches.
BLANCPAIN	1,727,428	October 27, 1992	IC 014. Watches and parts thereof.
	4,518,491	June 4, 2013	IC 014. Jewelry [, precious stones] ; horological and chronometric instruments.

The Blancpain Marks are used in connection with the manufacture and distribution of high-quality goods in the category identified above. True correct and copies of the Certificates of Registration for the Blancpain Marks are attached to the Complaint as Exhibit "2."

15. Blancpain is engaged in the promotion, distribution, and sale of high-quality products in the United States and worldwide under the Blancpain Marks.

16. For many years, Blancpain has used the Blancpain Marks in connection with the marketing and sale of Blancpain's high-quality products in the United States.

17. Genuine Blancpain products are marketed and sold throughout the United States at Blancpain boutiques, at Tourbillon Boutiques, owned by The Swatch Group Les Boutiques

Ltd. an affiliated company of the Swatch Group, at select and prestigious retailers, and via the Internet.

18. During the time that Blancpain products have been sold in interstate commerce under the Blancpain Marks, Blancpain has expended significant monetary resources to extensively advertise and promote products under the Blancpain Marks in magazines, newspapers, in stores, on the Internet and in other media worldwide, including the official Blancpain website, www.blancpain.com. In the last five years alone, The Swatch Group's sales of watches and other goods, including for Blancpain, have been well into the many millions of dollars.

19. As a result of the foregoing, the Blancpain Marks have acquired fame in the consumer market for a wide variety of products, including watches.

20. The Blancpain Marks are widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as identifiers of high-quality goods.





21. The Blancpain Marks have come to symbolize the enormous goodwill of Blancpain's business throughout the United States and the world.

22. The Blancpain Marks have never been abandoned. Blancpain actively polices and enforces its trademark rights.

23. The Blancpain Marks are vital to Blancpain's business, as the Marks represent a significant value to the company and its associated image. Blancpain suffers irreparable harm to its goodwill, as well as a direct monetary loss, any time any third parties, including Defendants, sell counterfeit and infringing goods bearing an identical or substantially similar trademarks.

Longines' Rights

24. Longines is the owner of the following trademarks, which are valid and registered on the Principal Register of the United States Patent and Trademark Office (the "Longines Marks"):

Trademark	Registration Number	Registration Date	Class / Goods
	065,109	September 10, 1907	IC 014. Watches, parts of watches, and watchcases
	668,956	October 28, 1958	IC 014. Watches and watch movements and parts thereof
	1,328,417	April 2, 1985	IC 014. Clocks, Watches and Parts Therefor, and Jewelry and Costume Jewelry
	1,377,147	January 7, 1986	IC 014. Watches and parts therefor, and jewelry and costume jewelry.

The Longines Marks are used in connection with the manufacture and distribution of high-quality goods in the category identified above. True and correct copies of the Certificates of Registration for the Longines Marks are attached to the Complaint as Exhibit "3."

25. Longines is engaged in the promotion, distribution, and sale of high-quality products in the United States and worldwide under the Longines Marks.

26. For many years, Longines has used the Longines Marks in connection with the marketing and sale of Longines' high-quality products in the United States.

27. Genuine Longines products are marketed and sold throughout the United States at Longines boutiques, at Hour Passion boutiques, owned by The Swatch Group Les Boutiques Ltd. an affiliated company of the Swatch Group, at select and prestigious retailers, and via the Internet.

28. During the time that Longines products have been sold in interstate commerce under the Longines Marks, Longines has expended significant monetary resources to extensively

advertise and promote products under the Longines Marks in magazines, newspapers, in stores, on the Internet and in other media worldwide, including the official Longines website, www.longines.com. In the last five years alone, The Swatch Group's sales of watches and other goods, including for Longines, have been well into the many millions of dollars.

29. As a result of the foregoing, the Longines Marks have acquired fame in the consumer market for a wide variety of products, including watches.

30. The Longines Marks are widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as identifiers of high-quality goods.


31. The Longines Marks have come to symbolize the enormous goodwill of Longines' business throughout the United States and the world.

32. The Longines Marks have never been abandoned. Longines actively polices and enforces its trademark rights.

33. The Longines Marks are vital to Longines' business, as the Marks represent a significant value to the company and its associated image. Longines suffers irreparable harm to its goodwill, as well as a direct monetary loss, any time any third parties, including Defendants, sell counterfeit and infringing goods bearing an identical or substantially similar trademarks.

Glashütte Original's Rights

34. Glashütte Original is the owner of the following trademark, which is valid and registered on the Principal Register of the United States Patent and Trademark Office (the "Glashütte Original Mark"):

Trademark	Registration Number	Registration Date	Class / Goods
	2,519,207	December 18, 2001	C 014. horological and chronometric instruments, namely, watches, parts of clocks and watches [, alarms for clocks, precious metals and their alloys sold in bulk, precious metals, jewelry, precious gemstones, imitation jewelry, cufflinks, tie pins, and belt buckles made of precious metal].

The Glashütte Original Mark is used in connection with the manufacture and distribution of high-quality goods in the category identified above. A true and correct copy of the Certificate of Registration for the Glashütte Original Mark is attached to the Complaint as Exhibit “4.”

35. Glashütte Original is engaged in the promotion, distribution, and sale of high-quality products in the United States and worldwide under the Glashütte Original Mark.

36. For many years, Glashütte Original has used the Glashütte Original Mark in connection with the marketing and sale of Glashütte Original’s high quality products in the United States.

37. Genuine Glashütte Original products are marketed and sold throughout the United States at Tourbillon Boutiques, owned by The Swatch Group Les Boutiques Ltd. an affiliated company of the Swatch Group, at select and prestigious retailers, and via the Internet.

38. During the time that Glashütte Original products have been sold in interstate commerce under the Glashütte Original Mark, Glashütte Original has expended significant monetary resources to extensively advertise and promote products under the Glashütte Original Mark in magazines, newspapers, in stores, on the Internet and in other media worldwide, including the official Glashütte Original website, www.glashuette-original.com. In the last five

years alone, The Swatch Group's sales of watches and other goods, including for Glashütte Original, have been well into the many millions of dollars.

39. As a result of the foregoing, the Glashütte Original Mark has acquired fame in the consumer market for a wide variety of products, including watches.

40. The Glashütte Original Mark is a widely recognized trademark in the United States, and the trademark has achieved secondary meaning as an identifier of high-quality goods.

41. The Glashütte Original Mark has come to symbolize the enormous goodwill of Glashütte Original's business throughout the United States and the world.

42. The Glashütte Original Mark has never been abandoned. Glashütte Original actively polices and enforces its trademark rights.

43. The Glashütte Original Mark is vital to Glashütte Original's business, as the Mark represents a significant value to the company and its associated image. Glashütte Original suffers irreparable harm to its goodwill, as well as a direct monetary loss, any time any third parties, including Defendants, sell counterfeit and infringing goods bearing an identical or substantially similar trademark.

Hamilton's Rights

44. Hamilton is the owner of the following trademarks, which are valid and registered on the Principal Register of the United States Patent and Trademark Office (the "Hamilton Marks"):

Trademark	Registration Number	Registration Date	Class / Goods
HAMILTON	741,279	November 27, 1962	IC 014. Horological Instruments- Namely, Watches, Clocks, Chronometers, and Parts Thereof

KHAKI	1,148,416	March 17, 1981	IC 014. Watches.
VENTURA	1,622,393	November 13, 1990	IC 014. Watches, clocks and parts thereof
HAMILTON	2,181,720	August 18, 1998	IC 014. Watches

The Hamilton Marks are used in connection with the manufacture and distribution of high-quality goods in the category identified above. True and correct copies of the Certificates of Registration for the Hamilton Marks are attached to the Complaint as Exhibit “5.”

45. Hamilton is engaged in the promotion, distribution, and sale of high-quality products in the United States and worldwide under the Hamilton Marks.

46. For many years, Hamilton has used the Hamilton Marks in connection with the marketing and sale of Hamilton’s high-quality products in the United States.

47. Genuine Hamilton products are marketed and sold throughout the United States at Hour Passion boutiques, owned by The Swatch Group Les Boutiques Ltd. an affiliated company of the Swatch Group, at select and prestigious retailers, and via the Internet.

48. During the time that Hamilton products have been sold in interstate commerce under the Hamilton Marks, Hamilton has expended significant monetary to extensively advertise and promote products under the Hamilton Marks in magazines, newspapers, in stores, on the Internet and in other media worldwide, including the official Hamilton website, www.hamiltonwatch.com. In the last five years alone, The Swatch Group’s sales of watches and other goods, including for Hamilton, have been well into the many millions of dollars.

49. As a result of the foregoing, the Hamilton Marks have acquired fame in the consumer market for a wide variety of products, including watches.

50. The Hamilton Marks are widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as identifiers of high-quality goods.


51. The Hamilton Marks have come to symbolize the enormous goodwill of Hamilton's business throughout the United States and the world.

52. The Hamilton Marks have never been abandoned. Hamilton actively polices and enforces its trademark rights.

53. The Hamilton Marks are vital to Hamilton's business, as the Marks represent a significant value to the company and its associated image. Hamilton suffers irreparable harm to its goodwill, as well as a direct monetary loss, any time any third parties, including Defendants, sell counterfeit and infringing goods bearing an identical or substantially similar trademarks.

Breguet's Rights

54. Breguet is the owner of the following trademarks, which are valid and registered on the Principal Register of the United States Patent and Trademark Office (the "Breguet Marks"):

Trademark	Registration Number	Registration Date	Class / Goods
BREGUET	3,042,405	January 10, 2006	IC 014. Watches, watch straps, watch bracelets, and parts thereof, horological instruments, namely, chronometers and chronographs
	3,414,708	April 22, 2008	IC 009. [Spectacles and sunglasses; spectacle frames; spectacle cases; chains for spectacles; apparatus for recording; transmitting and reproducing sound or images, namely, CD and DVD players; magnetic recording media and recording discs, namely, blank CDs, blank DVDs;] magnetic recording media and recording discs, namely, pre-recorded

			<p>CDs and DVDs in the field of musical festivals.</p> <p>IC 014. Jewelry, horological and chronometric instruments.</p> <p>IC 016. Printed matter and periodicals, namely, books, magazines, catalogs, brochures, featuring horological and chronometric instruments, jewelry and writing instruments; stationery, namely, pencils, pens, and fountain pens.</p> <p>IC 018. Goods made of leather and imitation leather, namely, wallets, briefcases, business card cases, key cases, backpacks, trunks, valises, umbrellas.</p> <p>IC 025. Clothing, namely, [caps, hats,] scarves, neckties [, belts, shirts, T-shirts, and jackets].</p>
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The Breguet Marks are used in connection with the manufacture and distribution of high-quality goods in the category identified above. True and correct copies of the Certificates of Registration for the Breguet Marks are attached to the Complaint as Exhibit “6.”

55. Breguet is engaged in the promotion, distribution, and sale of high-quality products in the United States and worldwide under the Breguet Marks.

56. For many years, Breguet has used the Breguet Marks in connection with the marketing and sale of Breguet’s high quality products in the United States.

57. Genuine Breguet products are marketed and sold throughout the United States at Breguet Boutiques, at Tourbillon Boutiques, owned by The Swatch Group Les Boutiques Ltd. an affiliated company of the Swatch Group, at select and prestigious retailers, and via the Internet.

58. During the time that Breguet products have been sold in interstate commerce under the Breguet Marks, Breguet has expended significant monetary to extensively advertise and promote products under the Breguet Marks in magazines, newspapers, in stores, on the

Internet and in other media worldwide, including the official Breguet website, www.breguet.com. In the last five years alone, The Swatch Group's sales of watches and other goods, including Breguet, have been well into the many millions of dollars.

59. As a result of the foregoing, the Breguet Marks have acquired fame in the consumer market for a wide variety of products, including watches.

60. The Breguet Marks are widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as an identifier of high-quality goods.

61. The Breguet Marks have come to symbolize the enormous goodwill of Breguet's business throughout the United States and the world.

62. The Breguet Marks have never been abandoned. Breguet actively polices and enforces its trademark rights.

63. The Breguet Marks are vital to Breguet's business, as the Marks represent a significant value to the company and its associated image. Breguet suffers irreparable harm to its goodwill, as well as a direct monetary loss, any time any third parties, including Defendants, sell counterfeit and infringing goods bearing an identical or substantially similar trademarks.

Rado's Rights

64. Rado is the owner of the following trademark, which is valid and registered on the Principal Register of the United States Patent and Trademark Office (the "Rado Mark"):

Trademark	Registration Number	Registration Date	Class / Goods
RADO	1,729,207	November 3, 1992	IC 014. watches and parts thereof

The Rado Mark is used in connection with the manufacture and distribution of high-quality goods in the category identified above. A true and correct copy of the Certificate of Registration for the Rado Mark is attached to the Complaint as Exhibit “7.”

65. Rado is engaged in the promotion, distribution, and sale of high-quality products in the United States and worldwide under the Rado Mark.

66. For many years, Rado has used the Rado Mark in connection with the marketing and sale of Rado’s high-quality products in the United States.

67. Genuine Rado products are marketed and sold at Hour Passion boutique owned by The Swatch Group Les Boutiques Ltd. an affiliated company of the Swatch Group, throughout the United States and at high-quality retailers, which are carefully selected and satisfy certain criteria, and via the Internet.

68. During the time that Rado products have been sold in interstate commerce under the Rado Mark, Rado has expended significant monetary resources to extensively advertise and promote products under the Rado Mark in magazines, newspapers, in stores, on the Internet and in other media worldwide, including the official Rado website, www.rado.com. In the last five years alone, The Swatch Group’s sales of watches and other goods, including for Rado, have been well into the many millions of dollars.

69. As a result of the foregoing, the Rado Mark has acquired fame in the consumer market for a wide variety of products, including watches.

70. The Rado Mark is widely recognized trademark in the United States, and the trademark has achieved secondary meaning as an identifier of high-quality goods.


71. The Rado Mark has come to symbolize the enormous goodwill of Rado’s business throughout the United States and the world.

72. The Rado Mark has never been abandoned. Rado actively polices and enforces its trademark rights.

73. The Rado Mark is vital to Rado's business, as the Mark represents a significant value to the company and its associated image. Rado suffers irreparable harm to its goodwill, as well as a direct monetary loss, any time any third parties, including Defendants, sell counterfeit and infringing goods bearing an identical or substantially similar trademark.

Tissot's Rights

74. Tissot is the owner of the following trademarks, which are valid and registered on the Principal Register of the United States Patent and Trademark Office (the "Tissot Marks"):

Trademark	Registration Number	Registration Date	Class / Goods
TISSOT	1,639,684	April 2, 1991	IC 014. watches; parts, fittings and fixtures for watches
	3,653,565	July 14, 2009	IC 014. Horological and chronometric instruments.

The Tissot Marks are used in connection with the manufacture and distribution of high-quality goods in the category identified above. True and correct copies of the Certificates of Registration for the Tissot Marks are attached to the Complaint as Exhibit "8."

75. Tissot is engaged in the promotion, distribution, and sale of high-quality products in the United States and worldwide under the Tissot Marks.

76. For many years, Tissot has used the Tissot Marks in connection with the marketing and sale of Tissot's high-quality products in the United States.

77. Genuine Tissot products are marketed and sold throughout the United States at Tissot Flagship Store, owned by The Swatch Group Les Boutiques Ltd. an affiliated company of the Swatch Group, at select and prestigious retailers, and via the Internet.

78. During the time that Tissot products have been sold in interstate commerce under the Tissot Marks, Tissot has expended significant monetary resources to extensively advertise and promote products under the Tissot Marks in magazines, newspapers, in stores, on the Internet and in other media worldwide, including the official Tissot website, www.tissotwatches.com. In the last five years alone, The Swatch Group's sales of watches and other goods, including for Tissot, have been well into the many millions of dollars.

79. As a result of the foregoing, the Tissot Marks have acquired fame in the consumer market for a wide variety of products, including watches.

80. The Tissot Marks are widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as identifiers of high-quality goods.

81. The Tissot Marks have come to symbolize the enormous goodwill of Tissot's business throughout the United States and the world.

82. The Tissot Marks have never been abandoned. Tissot actively polices and enforces its trademark rights.

83. The Tissot Marks are vital to Tissot's business, as the Marks represent a significant value to the company and its associated image. Tissot suffers irreparable harm to its goodwill, as well as a direct monetary loss, any time any third parties, including Defendants, sell counterfeit and infringing goods bearing an identical or substantially similar trademarks.

Investigation of Defendants' Counterfeiting Activities

84. Plaintiffs discovered Defendants are promoting, advertising, offering for sale, and selling goods using counterfeit and infringing trademarks which are exacts copies of one or more the Omega Marks, Blancpain Marks, Longines Marks, Glashütte Original Mark, Hamilton Marks, Breguet Marks, Rado Mark, and Tissot Marks (collectively, "Plaintiffs' Marks"), without

Plaintiffs' authorization, via at least the fully interactive commercial Internet websites operating under the domain names identified on Schedule "A" hereto (the "Subject Domain Names").

Defendants do not have, nor have they ever had, the right or authority to use Plaintiffs' Marks.

Further, Plaintiffs' Marks have never been assigned or licensed to be used in connection with any of the Subject Domain Names.

85. Prior to filing this Declaration, I reviewed the various goods bearing Plaintiffs' Marks offered for sale by Defendants via the Internet websites operating under each of the Subject Domain Names and/or the websites to which those domain names either automatically or manually redirect, and I determined the products were non-genuine, unauthorized versions of Plaintiffs' branded products. I reached this conclusion through my observations of the pricing, which is far below the prices of Plaintiffs' genuine goods of similar style and design. I also observed certain product and marking characteristics which are not consistent with Plaintiffs' genuine goods. Additionally, I personally know that Plaintiffs do not conduct business with Defendants, nor do Defendants have the right or authority to use Plaintiffs' Marks for any purpose. Finally, I noted disclaimers on most of the Internet websites in which Defendants expressly acknowledge Plaintiffs' branded goods sold thereon are "replica" or "fake."

86. In view of the foregoing, I can confirm the products Defendants are offering for sale and/or promoting using Plaintiffs' Marks via the Internet websites operating under the Subject Domain Names are non-genuine versions of Plaintiffs' products.

Harm Caused To Plaintiffs By Defendants' Activities

87. Plaintiffs' genuine branded goods are widely legitimately advertised, promoted, offered for sale, and discussed by Plaintiffs, their authorized distributors and unrelated third parties via the Internet.

88. Visibility on the Internet, particularly via Internet search engines such as Google, Yahoo! and Bing, is important to Plaintiffs' overall marketing and consumer education efforts. Thus, Plaintiffs expend significant monetary and other resources on Internet marketing and consumer education regarding their products, including search engine optimization ("SEO") and search engine marketing ("SEM") strategies, which allow Plaintiffs and their authorized retailers to educate consumers fairly and legitimately about the value associated with Plaintiffs' brands and the goods sold thereunder.

89. By engaging in advertising and SEO and SEM marketing strategies based upon an illegal use of Plaintiffs' Marks, Defendants are obliterating the otherwise open and available marketplace space in which Plaintiffs have the right to fairly market their goods and associated message. Specifically, Defendants use unauthorized counterfeits of one or more of Plaintiffs' trademarks to make their websites selling illegal goods appear more relevant and attractive to consumers searching for Plaintiffs' goods and information online. Such illegal use results in unfair competition for Plaintiffs when competing for visibility on the World Wide Web, including search engine results space.

90. As a result of the availability of the non-genuine branded goods offered for sale by Defendants, Plaintiffs are highly likely to experience irreparable damage to their reputations among consumers absent the entry of an appropriate injunction.

I declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct. Executed this 26 day of January, 2022 in Biel/Bienne, Switzerland.



Antoine Haller

SCHEDULE "A"
DEFENDANTS 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	billigeklokke.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	dilussotime.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