

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

David S. Kahn
Nevada Bar No. 007038
J. Scott Burris
Nevada Bar No. 010529
Juan P. Rodriguez
Nevada Bar No. 010733
WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP
300 South Fourth Street, 11th Floor
Las Vegas, NV 89101
(702) 727-1400; FAX (702) 727-1401
E-mail: David.Kahn@wilsonelser.com
J.Scott.Burris@wilsonelser.com
Juan.Rodriguez@wilsonelser.com

Stephen M. Gaffigan (*Pro Hac Vice*)
STEPHEN M. GAFFIGAN, P.A.
401 East Las Olas Blvd., Suite 130-453
Ft. Lauderdale, Florida 33301
Telephone: (954) 767-4819
Facsimile: (954) 767-4821
E-mail: stephen@smgpa.net

Attorneys for Plaintiff Tiffany (NJ), LLC

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

TIFFANY (NJ), LLC,)	Case 2:11-cv-00590-LDG-GWF
)	
Plaintiff,)	
)	[PROPOSED] ORDER GRANTING
v.)	PLAINTIFF'S APPLICATION FOR
)	ENTRY OF PRELIMINARY
925LY.COM, <i>et al.</i> ,)	INJUNCTION
)	
Defendants.)	
)	

THIS MATTER is before the Court on Plaintiff's Ex Parte Application for Entry of a Temporary Restraining Order and Preliminary Injunction (the "Application for Preliminary Injunction") (#5), and upon the Preliminary Injunction Hearing held on May 25, 2011. The Court has carefully reviewed said Motion, the entire court file and is otherwise fully advised in the premises.

1 By the instant Application (# 5), Plaintiff Tiffany (NJ), LLC (“Tiffany”), moves for entry of a
 2 preliminary injunction against Defendants, The Partnerships and Unincorporated Associations
 3 indentified on Schedule “A” hereto and Does 1-1000 (collectively “Defendants”) for alleged
 4 violations of the Lanham Act, 15 U.S.C. §§ 1114, and 1125(a) and (d).

5 The Court convened the hearing on May 25, 2011, at which only counsel for Plaintiff was
 6 present and available to present evidence supporting the Application for Preliminary Injunction (#5).
 7 Defendants have not responded to the Application for Preliminary Injunction, nor made any filing in
 8 this case, nor have Defendants appeared in this matter either individually or through counsel.
 9 Because Plaintiff has satisfied the requirements for the issuance of a preliminary injunction, the
 10 Court will grant Plaintiff’s Application for Preliminary Injunction (#5).


11 **I. Factual and Procedural Background**

12 On May 11, 2011, the Court entered a temporary restraining order on the following facts from
 13 Plaintiff’s Complaint (#1), *Ex Parte* Application for Entry of a Temporary Restraining Order and
 14 Preliminary Injunction (#5), and supporting evidentiary submissions

15 Tiffany is a Delaware limited liability company, with its principal place of business in the
 16 United States located at 15 Sylvan Way, Parsippany, NJ 07054. (Compl. ¶ 2.) Tiffany is engaged in
 17 the manufacture, promotion, distribution, and sale in interstate commerce, including within this
 18 Judicial District, of high quality products under Tiffany’s trademarks. (Declaration of Steven
 19 Costello in Support of Plaintiff’s *Ex Parte* Application for Entry of Temporary Restraining Order
 20 and Preliminary Injunction, and Order Authorizing Alternate Service of Process [“Costello Decl.”] ¶
 21 5.)

22 Tiffany is, and at all times relevant hereto has been, the owner and/or exclusive licensee of all
 23 rights in and to the following Federally registered trademarks:

<u>Trademark</u>	<u>Registration No.</u>	<u>Registration Date</u>
TIFFANY & CO	0,023,573	September 5, 1893
Tiffany	0,133,063	July 6, 1920
TIFFANY & CO.	1,228,189	February 22, 1983

1	TIFFANY	1,228,409	February 22, 1983
2	TIFFANY & CO.	1,283,306	June 26, 1984
3	ATLAS	1,605,467	July 10, 1990
4	T & CO.	1,669,365	December 24, 1991
5		1,785,204	August 3, 1993
6	PERETTI	1,787,861	August 17, 1993
7	ELSA PERETTI	1,799,272	October 19, 1993
8		1,804,353	November 16, 1993
9	TIFFANY & CO.	1,968,614	April 16, 1996
10		2,184,128	August 25, 1998
11		2,359,351	June 20, 2000
12	TIFFANY	2,639,539	October 22, 2002
13	ATLAS	2,886,655	September 21, 2004

14 (the “Tiffany Marks”) which are registered in International Classes 14 and 21, and are used in
15 connection with the manufacture and distribution of, among other things, high quality jewelry,
16 including bracelets, necklaces, pendants, earrings and rings, cufflinks, money clips, key rings,
17 watches, and gift boxes. (Costello Decl. ¶ 4. *See also* United States Trademark Registrations of the
18 Tiffany Marks at issue [“Tiffany Trademark Registrations”] attached as Exhibit A to the Costello
19 Decl.)

20 Defendants have advertised, offered for sale, and/or sold at least jewelry, including bracelets,
21 necklaces, pendants, earrings and rings, cufflinks, money clips, key rings, watches, and gift boxes,
22 bearing what Plaintiff has determined to be counterfeits, reproductions, and/or colorable imitations
23 of the Tiffany Marks. (Costello Decl. ¶¶ 9-15; Declaration of Brandon Tanori in Support of
24 Plaintiff’s *Ex Parte* Application for Entry of Temporary Restraining Order and Preliminary
25 Injunction [“Tanori Decl.”] ¶ 4.) Defendants are not now, nor have they ever been, authorized or
26 licensed to use, reproduce, or make counterfeits, reproductions, and/or colorable imitations of the
27 Tiffany Marks. (Costello Decl. ¶ 9.)

28

1 Plaintiff retained Brandon Tanori (“Tanori”) of Investigative Consultants to investigate
2 suspected sales of counterfeit Tiffany branded products by Defendants. (Costello Decl. ¶ 10; Tanori
3 Decl. ¶ 3.) Between February 15, 2011 and February 25, 2011, Tanori accessed the Internet websites
4 operating under the domain names brandtiffany.com, fakettiffany.org, goldtiffanyjewelry.com,
5 mirrorjewelry.com, myfakettiffany.com, replicattiffany.net, tiffanyforu.com, tiffanyo.com, and
6 top1tiffany.com, and placed orders for the purchase of Tiffany branded bracelets, necklaces, rings,
7 earrings, and key rings. (Tanori Decl. ¶ 4 and Composite Exhibit A attached thereto.) Tanori’s
8 purchases were processed entirely online, which included providing shipping and billing
9 information, payment, and confirmation of his orders. (Tanori Decl. ¶ 4 and Composite Exhibit A
10 attached thereto.)

11 Thereafter, a representative of Tiffany, Steven Costello, reviewed and visually inspected the
12 web page listings, including images, for each of the Tiffany branded goods purchased by Tanori and
13 determined the items were non-genuine Tiffany products. (Costello Decl. ¶¶ 11-12.) Additionally,
14 Costello reviewed and visually inspected the items bearing the Tiffany Marks offered for sale via the
15 Internet websites operating under the partnership and/or business association names identified on
16 Schedule “A” hereto (the “Subject Domain Names”) and determined the products were non-genuine
17 Tiffany products. (Costello Decl. ¶ 12 and Composite Exhibit B attached thereto, relevant web page
18 captures from Defendants’ Internet websites operating under the Subject Domain Names displaying
19 the Tiffany branded items offered for sale.)

20 On April 18, 2011, Plaintiff filed its Complaint (#1) against Defendants for trademark
21 counterfeiting and infringement, false designation of origin, and cyberpiracy. On April 19, 2011,
22 Plaintiff filed its *Ex Parte* Application for Entry of a Temporary Restraining Order and Preliminary
23 Injunction (#5). On May 11, 2011, the Court issued an Order Granting Plaintiff’s *Ex Parte*
24 Application for a Temporary Restraining Order and temporarily restrained Defendants from
25 infringing the Tiffany Marks at issue. Proofs of Service confirming service via e-mail and
26 publication on Defendants and compliance with the Court’s May 11, 2011 Order were filed on May
27 24, 2011, certifying service of the Court’s May 11, 2011 Order and Plaintiff’s *Ex Parte* Application

1 for Entry of a Temporary Restraining Order and Preliminary Injunction and supporting papers. (#'s
2 14, 15 and 16).

3 **II. Conclusions of Law**

4 The declarations and supporting evidentiary submissions Plaintiff submitted in support of its
5 Application for Preliminary Injunction support the following conclusions of law:

6 A. Plaintiff has a very strong probability of proving at trial that consumers are likely to
7 be confused by Defendants' advertisement, promotion, sale, offer for sale, and/or distribution of
8 jewelry, including bracelets, necklaces, pendants, earrings and rings, cufflinks, money clips, key
9 rings, watches, and gift boxes, bearing counterfeits, reproductions, and/or colorable imitations of the
10 Tiffany Marks, and that the products Defendants are selling are copies of Plaintiff's products that
11 bear copies of the Tiffany Marks on jewelry, including bracelets, necklaces, pendants, earrings and
12 rings, cufflinks, money clips, key rings, watches, and gift boxes.

13 B. Because of the infringement of the Tiffany Marks, Plaintiff is likely to suffer
14 immediate and irreparable injury if a preliminary injunction is not granted. It clearly appears from the
15 following specific facts, as set forth in Plaintiff's Complaint, Application for Preliminary Injunction,
16 and accompanying declarations on file, that immediate and irreparable loss, damage, and injury will
17 result to Plaintiff and to consumers because it is more likely true than not that:

18 1. Defendants appear to be operating Internet business operations which
19 promote, advertise, offer for sale, and sell at least jewelry, including bracelets, necklaces, pendants,
20 earrings and rings, cufflinks, money clips, key rings, watches, and gift boxes bearing counterfeit and
21 infringing trademarks in violation of Plaintiff's rights;

22 2. Plaintiff has well-founded fears that more counterfeit and infringing jewelry,
23 including bracelets, necklaces, pendants, earrings and rings, cufflinks, money clips, key rings,
24 watches, and gift boxes bearing Plaintiff's trademarks will appear in the marketplace; that consumers
25 may be misled, confused, and disappointed by the quality of these products; and that Plaintiff may
26 suffer loss of sales for its genuine products;

1 distribution, or transfer of any products bearing the Tiffany Marks, or any
2 confusingly similar trademarks.

3 (2) Defendants, their officers, directors, employees, agents, subsidiaries, distributors, and
4 all persons in active concert or participation with them having notice of this Order shall, until the
5 conclusion of this action, discontinue the use of the Tiffany Marks or any confusingly similar
6 trademarks, on or in connection with all Internet websites owned and operated, or controlled by them
7 including the Internet websites operating under the Subject Domain Names;

8 (3) Defendants, their officers, directors, employees, agents, subsidiaries, distributors, and
9 all persons in active concert or participation with Defendants having notice of this Order shall, until
10 the conclusion of this action, discontinue the use of the Tiffany Marks, or any confusingly similar
11 trademarks within domain name extensions, metatags or other markers within website source code,
12 from use on any webpage (including as the title of any web page), any advertising links to other
13 websites, from search engines' databases or cache memory, and any other form of use of such terms
14 which is visible to a computer user or serves to direct computer searches to websites registered by,
15 owned, or operated by Defendants, including the Internet websites operating under the Subject
16 Domain Names;

17 (4) Defendants shall not transfer ownership of the Subject Domain Names during the
18 pendency of this Action, or until further Order of the Court;

19 (5) The domain name Registrars for the Subject Domain Names are directed, to the
20 extent it is not already done, to transfer to Plaintiff's counsel, for deposit with this Court, domain
21 name certificates for the Subject Domain Names;

22 (6) The Registrars and the top-level domain (TLD) Registries for the Subject Domain
23 Names, upon receipt of this Preliminary Injunction shall, to the extent it is not already done, change
24 or assist in changing, the Registrar of record for the Subject Domain Names to a holding account
25 with the United States based Registrar, GoDaddy.com, Inc. GoDaddy.com, Inc. shall hold and/or
26 continue to hold the Subject Domain Names in trust for the Court during the pendency of this action.
27 Additionally, GoDaddy.com, Inc., upon receipt of this Order, shall, to the extent not already done,
28

1 immediately update and/or not modify the Domain Name System (“DNS”) data it maintains for the
2 Subject Domain Names, which links the domain names to the IP addresses where their associated
3 websites are hosted, from NS1.MEDIATEMPLE.NET and NS2.MEDIATEMPLE.NET, which
4 currently causes the domain names to resolve to the website where a copy of the Complaint,
5 Summonses, and Orders and other documents on file in this action are displayed. Alternatively,
6 GoDaddy.com, Inc. may, to the extent not already done, institute and/or maintain a domain name
7 forwarding which will automatically redirect any visitor to the Subject Domain Names to the
8 following Uniform Resource Locator (“URL”) <http://servingnotice.com/off/index.html> whereon a
9 copy of the Complaint, Summonses, and Orders and other documents on file in this action are
10 displayed. The Subject Domain Names shall be maintained on Lock status, preventing the
11 modification or deletion of the domains by the registrar or Defendants;

12 (7) Plaintiff may continue to enter the Subject Domain Names into Google’s Webmaster
13 Tools and cancel any redirection of the domains that have been entered there by Defendants which
14 redirect traffic to the counterfeit operations to a new domain name and thereby evade the provisions
15 of this Order;

16 (8) Defendants shall continue to preserve copies of all their computer files relating to the
17 use of any of the Subject Domain Names and shall continue to take all steps necessary to retrieve and
18 preserve computer files relating to the use of any of the Subject Domain Names and that may have
19 been deleted before the entry of this Order;

20 (9) Plaintiff shall maintain its bond in the amount of Twenty-Thousand Dollars and Zero
21 Cents (\$20,000.00), as payment of damages to which Defendants may be entitled for a wrongful
22 injunction or restraint, during the pendency of this action, or until further Order of the Court;

23 (10) This Preliminary Injunction shall remain in effect during the pendency of this action,
24 or until such further date as set by the Court or stipulated to by the parties;

25 (11) This Preliminary Injunction shall apply to the Subject Domain Names and any other
26 domain names properly brought to the Court’s attention and verified by sworn affidavit to be used by
27

1 Defendants for the purpose of counterfeiting the Tiffany Marks at issue in this action and/or unfairly
2 competing with Tiffany in connection with search engine results pages.

3

4 IT IS SO ORDERED.

5 DATED: _____

LLOYD D. GEORGE
United States District Judge

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

SCHEDULE A
THE PARTNERSHIPS and UNINCORPORATED ASSOCIATIONS

1
2
3 Defendant 1: 925ly.com
4 Defendant 2: *Dismissed*
5 Defendant 3: 925silvershop.com
6 Defendant 4: 925tiffany.com
7 Defendant 5: 925tiffany.net
8 Defendant 6: 925wholesaler.com
9 Defendant 7: aliexpressuk.com
10 Defendant 8: *Dismissed*
11 Defendant 9: atjewelry.com
12 Defendant 10: atopsilver.com
13 Defendant 11: australiatiffanystore.com
14 Defendant 12: autiffany4sale.com
15 Defendant 13: b2bvogue.com
16 Defendant 14: bestbuytiffany.com
17 Defendant 15: better-tiffany.com
18 Defendant 16: beyeshop.com
19 Defendant 17: brandtiffany.com
20 Defendant 18: buy-tiffanyjewelry.com
21 Defendant 19: bybybuy.com
22 Defendant 20: canadatiffanystore.com
23 Defendant 21: cartiereshop.com
24 Defendant 22: casualtiffany.com
25 Defendant 23: *Dismissed*
26 Defendant 24: cheapdesignerwholesale.com
27 Defendant 25: cheaptiffanyjewelry.com a/k/a tiffanysales.org a/k/a 925silversale.com
28 Defendant 26: cheaptiffanys.com
Defendant 27: chinafamousproducts.com
Defendant 28: chinawholesalejewelry.com
Defendant 29: cityjewels.net
Defendant 30: coachjewelry.com
Defendant 31: coboen.com
Defendant 32: *Dismissed*
Defendant 33: cooltiffany.com
Defendant 34: crowntco925.com
Defendant 35: designerjewelry.net
Defendant 36: designertiffanyjewelry.org a/k/a alltiffanyjewelry.com
Defendant 37: diorgirl.com a/k/a tiffanyandcostore.com
Defendant 38: discounttiffany.com
Defendant 39: discounttiffanyjewelry.us
Defendant 40: doreplica.com
Defendant 41: eshopping-replica.com
Defendant 42: etiffanybag.com
Defendant 43: europeantiffany.com

- 1 Defendant 44: faketiffany.org
- 2 Defendant 45: faketiffanyjewelry.org a/k/a goldtiffanyjewelry.com
- 3 Defendant 46: fashionjewelryzone.com
- 4 Defendant 47: fashion-wigs.com a/k/a tiffanybraceletscheap.com
- 5 Defendant 48: forsaletiffany.com
- 6 Defendant 49: globlefashion.com
- 7 Defendant 50: goecshop.com
- 8 Defendant 51: goldtiffanyjewelry.com
- 9 Defendant 52: goolcool.com
- 10 Defendant 53: greatgolden.com
- 11 Defendant 54: handbagsforcheap.com
- 12 Defendant 55: hot-tiffany.com
- 13 Defendant 56: hotwholesaleonline.com
- 14 Defendant 57: idolbags.com a/k/a rwholesalejewelry.com
- 15 Defendant 58: ilikejewellery.com
- 16 Defendant 59: ilovetiffany.net
- 17 Defendant 60: istiffany.com
- 18 Defendant 61: ixreplicajewelry.com
- 19 Defendant 62: jewellery888.com
- 20 Defendant 63: jewellerybi.com
- 21 Defendant 64: jewelleryhotsale.com
- 22 Defendant 65: *Dismissed*
- 23 Defendant 66: jewelry-925.com
- 24 Defendant 67: jewelrycheapbuy.com
- 25 Defendant 68: jewelrykt.com a/k/a tiffanyjewelrynet.com
- 26 Defendant 69: jewelryorwatches.com a/k/a alltiffanyjewelry.com
- 27 Defendant 70: jewelryover.com
- 28 Defendant 71: jewelryrain.com
- 29 Defendant 72: jewelrysale925.com
- 30 Defendant 73: jwely.com
- 31 Defendant 74: kfjewelry.com a/k/a tiffanyjewelrynet.com
- 32 Defendant 75: kttop.com
- 33 Defendant 76: linkworldco.com
- 34 Defendant 77: lipwu.com
- 35 Defendant 78: lovetiffanyjewelry.com
- 36 Defendant 79: luckyjewelryshop.com
- 37 Defendant 80: luxurysandals2u.com
- 38 Defendant 81: *Dismissed*
- 39 Defendant 82: mirrorjewelry.com
- 40 Defendant 83: msmrapparel.com a/k/a tiffanyjewelrynet.com
- 41 Defendant 84: myfaketiffany.com
- 42 Defendant 85: mytiffanycity.com
- 43 Defendant 86: mytiffanyonline.com
- 44 Defendant 87: mytiffanysjewelry.com
- 45 Defendant 88: mytiffanysonline.com
- 46 Defendant 89: new925silverjewelry.com

- 1 Defendant 90: newtiffany.com
- 2 Defendant 91: newtiffanys.com a/k/a alltiffanyjewelry.com
- 3 Defendant 92: ojewellry.com
- 4 Defendant 93: onlytobuy.com
- 5 Defendant 94: *Dismissed*
- 6 Defendant 95: pocvt.com
- 7 Defendant 96: populartiffany.com
- 8 Defendant 97: prardashoeschina.com a/k/a prardashoechina.com
- 9 Defendant 98: pursestrade.com
- 10 Defendant 99: replicagalleryonline.com
- 11 Defendant 100: replicasilverjewelry.com
- 12 Defendant 101: replicasky.com
- 13 Defendant 102: replicatiffany.net
- 14 Defendant 103: saarcaa.com
- 15 Defendant 104: saletiffanyjewelry.org a/k/a tiffanysalejewelry.com a/k/a 925silversale.com
- 16 Defendant 105: *Dismissed*
- 17 Defendant 106: sheloves925silver.com
- 18 Defendant 107: shoes51.com
- 19 Defendant 108: silver-bulk.com
- 20 Defendant 109: silverjewelryblog.net a/k/a silvertiffanyshop.com
- 21 Defendant 110: silverjewelryworld.com
- 22 Defendant 111: *Dismissed*
- 23 Defendant 112: silvertiffanyshop.com
- 24 Defendant 113: silverurban.com
- 25 Defendant 114: solid925silver.com
- 26 Defendant 115: sterlingtiffany.com
- 27 Defendant 116: super925.com
- 28 Defendant 117: taltoo.com
- Defendant 118: tco1837.com
- Defendant 119: tcogift.com
- Defendant 120: thesalesky.com
- Defendant 121: tiffany4ever.com
- Defendant 122: tiffany4girls.com
- Defendant 123: tiffany4u.us
- Defendant 124: tiffany7.com
- Defendant 125: tiffanya.com
- Defendant 126: tiffanyamerica.com
- Defendant 127: tiffanyandcojewelry.com
- Defendant 128: tiffany-and-co-jewelry.com
- Defendant 129: tiffanyandcooutlet.com
- Defendant 130: tiffanyandco-outlet.com
- Defendant 131: tiffanyandcooutlet.org
- Defendant 132: tiffanyandcosale.com
- Defendant 133: tiffanyandcostore.com
- Defendant 134: tiffanyboss.com
- Defendant 135: tiffanybraceletscheap.com

- 1 Defendant 136: tiffanybuying.com
- Defendant 137: tiffanyco1837.com
- 2 Defendant 138: tiffanyco-mall.com a/k/a tiffanyco-mall.net
- Defendant 139: tiffanycouk.com
- 3 Defendant 140: *Dismissed*
- Defendant 141: *Dismissed*
- 4 Defendant 142: tiffany-fashion.com
- Defendant 143: tiffanyforsale.com
- 5 Defendant 144: tiffanyforu.com
- 6 Defendant 145: tiffany-guide.com
- Defendant 146: tiffanyhere.com
- 7 Defendant 147: tiffanyhotsale.com
- Defendant 148: tiffanyinfo.com
- 8 Defendant 149: tiffanyinlove.com
- 9 Defendant 150: tiffanyjewelersuk.com
- Defendant 151: tiffany-jewellery-shop.com
- 10 Defendant 152: *Dismissed*
- Defendant 153: tiffanyjewelry1837.com
- 11 Defendant 154: *Dismissed*
- Defendant 155: tiffanyjewelry2u.com
- 12 Defendant 156: tiffanyjewelry4sale.com
- Defendant 157: tiffanyjewelryauctions.com
- 13 Defendant 158: tiffanyjewelryforsale.com
- Defendant 159: tiffanyjewelrygift.com
- 14 Defendant 160: tiffanyjewelrynet.com
- Defendant 161: tiffany-jewelry-on-sale.com
- 15 Defendant 162: *Dismissed*
- Defendant 163: tiffanyjewelryoutlet.com
- 16 Defendant 164: tiffanyjewelry-outlet.com
- Defendant 165: *Dismissed*
- 17 Defendant 166: tiffanyjewelrysales.com
- Defendant 167: tiffanyjewelryshops.com a/k/a tiffanyjewelrynet.com
- 18 Defendant 168: tiffanyjewelrystores.com
- Defendant 169: *Dismissed*
- 19 Defendant 170: tiffanyknockoffs.com
- Defendant 171: tiffany-mine.com
- 20 Defendant 172: tiffanynew.com
- Defendant 173: tiffanyo.com
- 21 Defendant 174: tiffanyonlinestoreus.com
- Defendant 175: tiffanyonsale.net a/k/a ustiffany4sale.com
- 22 Defendant 176: tiffanyoutlet.com
- Defendant 177: *Dismissed*
- 23 Defendant 178: tiffanyoutletcheap.com
- Defendant 179: tiffanyoverstock.com
- 24 Defendant 180: tiffanys1837jewelry.com
- 25 Defendant 181: tiffanysalesstore.com
- 26
- 27
- 28

- 1 Defendant 182: tiffanysave.com
- Defendant 183: tiffanysselected.com
- 2 Defendant 184: tiffany-seller.com
- Defendant 185: tiffanysforever.com
- 3 Defendant 186: *Dismissed*
- Defendant 187: tiffanysjewelryonline.com
- 4 Defendant 188: tiffanysjewelryshop.com
- Defendant 189: tiffanysjewelryworld.com
- 5 Defendant 190: tiffanysky.com
- 6 Defendant 191: tiffanysocool.com
- Defendant 192: tiffanysonly.com
- 7 Defendant 193: tiffany-sterling-silvers.com
- 8 Defendant 194: tiffanystock.com
- Defendant 195: tiffanystore.uk.com
- 9 Defendant 196: tiffanysupplier.com
- Defendant 197: tiffanytopsale.com
- 10 Defendant 198: tiffanyuksale.com
- Defendant 199: tiffanyusonsale.com
- 11 Defendant 200: tiffanywto.com
- 12 Defendant 201: toopgood.com
- Defendant 202: top1tiffany.com
- 13 Defendant 203: towholesalejewelry.com
- Defendant 204: uktiffanyonsale.com
- 14 Defendant 205: upoun.com
- 15 Defendant 206: urbanclothingchina.com
- Defendant 207: usdesignerjewelry.com
- 16 Defendant 208: ustiffany4sale.com
- Defendant 209: utiffany.com
- 17 Defendant 210: vogueonsale.com
- 18 Defendant 211: watches-trade.com
- Defendant 212: wholesale1837.com
- 19 Defendant 213: wholesaleabc.net
- Defendant 214: wholesaleanywhere.com
- 20 Defendant 215: wholesalecm.com
- 21 Defendant 216: wholesale-tiffany-jewellery.com
- Defendant 217: wholesaletiffanyjewelry.net a/k/a tiffanyonlineus.com
- 22 Defendant 218: whslecn.com
- Defendant 219: winlo.com
- 23 Defendant 220: wowyahoo.com
- 24 Defendant 221: x-jewelrybox.com
- Defendant 222: yahoowholesaler.com
- 25 Defendant 223: yasajewelry.com a/k/a tiffanyjewelrynet.com

26
27
28