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13 *Attorneys for Plaintiff TIFFANY (NJ), LLC*

14 THE UNITED STATES DISTRICT COURT
 15 FOR THE DISTRICT OF NEVADA

17	TIFFANY (NJ), LLC,)	Case No. 2:11-cv-00590-LDG-CWH
)	
18	Plaintiff,)	
)	PLAINTIFF’S SECOND <i>EX PARTE</i>
19	v.)	APPLICATION FOR ENTRY OF
)	TEMPORARY RESTRAINING ORDER
20	925LY.COM, <i>et al.</i> ,)	AND PRELIMINARY INJUNCTION
)	
21	Defendants.)	
)	
22)	
)	
23)	

24 Plaintiff Tiffany (NJ), LLC (“Plaintiff” or “Tiffany”), hereby does apply, on an *ex parte*
 25 basis, for entry of a temporary restraining order and, upon expiration of the temporary restraining
 26 order, a preliminary injunction against Defendants 224-389, The Partnerships and Unincorporated
 27 Associations identified on Schedule “A” hereto (collectively the “Group III Defendants”) pursuant to

1 15 U.S.C. § 1116 and Fed. R. Civ. P. 65.

2 Good cause exists for the foregoing orders. As set forth in the accompanying Memorandum
3 of Points and Authorities, the Group III Defendants and various unknown associates are promoting,
4 selling, offering for sale and distributing counterfeit and infringing Tiffany branded products within
5 this Judicial District through various fully interactive commercial Internet websites. The activities of
6 the Group III Defendants constitute unfair competition and willful and intentional infringement and
7 counterfeiting of Tiffany's trademarks in total disregard of Tiffany's rights, and have taken place in
8 spite of the Group III Defendants' knowledge that their use of Tiffany's trademarks was and is in
9 direct contravention of Tiffany's rights. Moreover, the Group III Defendants' registration of many
10 domain names, which incorporate at least one of Tiffany's registered trademarks, constitutes
11 cyberpiracy in violation of 15 U.S.C. § 1125(d). The Group III Defendants' unlawful activities have
12 caused and will continue to cause irreparable injury to Tiffany.

13 This Application is based upon the accompanying Memorandum of Points and Authorities
14 and the Declarations of Stephen M. Gaffigan, Steven Costello, and Danilo Marquez, and exhibits
15 thereto, filed concurrently herewith, and the complete files and records of this action, and such other
16 matters as Tiffany may call to the Court's attention at or before the time of hearing.

17 Upon entry of a temporary restraining order, the Application, supporting papers and order
18 will be served upon the Defendants via e-mail to the e-mail addresses provided by the Group III
19 Defendants to the registrars responsible for their respective domain names and will be provided by
20 email to the registrar of record for each of the Group III Subject Domain Names, so that the registrar
21 of record for each of the Group III Subject Domain Names may notify each registrant of the Order
22 and provide notice of the locking of the domain name to the registrant of record.

23 WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests this Court grant
24 its application and enter a temporary restraining order, and schedule a hearing on Plaintiff's Second
25 Application for Preliminary Injunction before the expiration of the Second Temporary Restraining
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27
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1 Order.

2 Dated: September ____, 2011

Respectfully submitted,

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By: /s/ David S. Kahn

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David S. Kahn

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J. Scott Burris

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Juan P. Rodriguez

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SCHEDULE A

GROUP III DEFENDANTS BY SUBJECT DOMAIN NAME AND DEFENDANT NUMBER

Defendant No.	Domain Name	E-commerce Website	Blog Style Websites
Defendant 224	1837fashion.com	X	
Defendant 225	21replica.org	X	
Defendant 226	21tiffany.com	X	
Defendant 227	tiffany100.com	X	
	3girls2cents1blog.com		X
	buttercantfly.com		X
	byloridesigns.com		X
	gossipgirlcentral.net		X
	graphicaddiction.net		X
	hamann-studio.com		X
	idiosympathy.com		X
	jonilynphotographyblog.com		X
	loveandletlove.org		X
	mattiasostmar.com		X
	memusicing.com		X
	mianetic.net		X
	minethemovieblog.com		X
	mp3skylines.com		X
	nuttinbutpimp.com		X
	openprojectdatabase.org		X
	rck2.com		X
	rss-aggregator-de.net		X
	sangreboliviana.com		X
	saveoneitmatters.com		X
	shapeswithoutsubstance.com		X
	sharpimagedesigns.net		X
	tellensplacedesigns.com		X
	thebizzmusic.com		X
	voteforanswersnh.com		X
	wiiwashere.com		X
	woprosow.net		X

1	Defendant 228	925jewelryshop.net	X	
		925silverjewellery.org	X	
2		jewelrysale4u.com	X	
3		royal925.org	X	
4	Defendant 229	925silverdiscount.com	X	
5	Defendant 230	newtiffany1837.com	X	
		tiffany-collections.com	X	
6		925tiffanyjewelry.com		X
7	Defendant 231	atwholesalestore.com	X	
8	Defendant 232	australiatiffanyjewellery.com	X	
9	Defendant 233	besttiffanyjewelry.com	X	
	Defendant 234	bodyjewelrysstore.com	X	
10	Defendant 235	buytiffanystore.com	X	
11		tiffanystoreonsale.com	X	
12	Defendant 236	canadatiffanyjewellery.com	X	
13	Defendant 237	cartierbraceletsok.com	X	
		chanelearringsok.com	X	
14		cheap-juicy-bracelet.com	X	
15		thomassabocharmsok.com	X	
16		tiffanynecklaceok.com	X	
17	Defendant 238	cheapertiffany.com	X	
18	Defendant 239	cheapertiffanyjewellery.com	X	
		tiffanyjewelleryok.com	X	
19	Defendant 240	cheaphandbags.cc	X	
20		salecheapestbags.com	X	
21	Defendant 241	cheaphandbagsbiz.com	X	
22	Defendant 242	cheap-silver.com	X	
23	Defendant 243	cheaptfjewelry.com	X	
	Defendant 244	cheaptiffanyoutlet.com	X	
24	Defendant 245	cheaptiffanystore.com	X	
25	Defendant 246	cheaptiffanyuk.com	X	
		cheaptiffanyukshop.com	X	
26	Defendant 247	classictiffanymarket.com	X	
27	Defendant 248	classictiffanysale.com	X	

1	Defendant 249	classictiffanyshop.com	X	
	Defendant 250	cndesignerbags.com	X	
2	Defendant 251	coachhandbagsreplica.com	X	
3	Defendant 252	cocorigo.com	X	
4	Defendant 253	designerjewelryok.com	X	
5	Defendant 254	designer-replica-watch.com	X	
		replica-supplier.com	X	
6	Defendant 255	discount-tiffanyjewelry.com	X	
7	Defendant 256	discounttiffanyjewelry.net	X	
8	Defendant 257	discount-wholesalejewelry.com	X	
9		toptiffanysales.com	X	
		wholesale-cheapjewelry.com	X	
10		wholesale-cheap-jewelry.com	X	
11		tiffanyfor.info		X
12	Defendant 258	emmsale.com	X	
13	Defendant 259	e-tiffanyandco.com	X	
14	Defendant 260	fashioncheapjewelry.com	X	
15	Defendant 261	fashiontiffany.org	X	
16	Defendant 262	generaljewellery.com	X	
		lndp.info		X
17	Defendant 263	googlejerseysshop.net	X	
		googlejerseys.us	X	
18	Defendant 264	gzcheap.net	X	
19		exporter-trade.biz	X	
20	Defendant 265	hiyeahmall.com	X	
		tiffanydiscounted.com	X	
21	Defendant 266	hotehandbags.com	X	
22	Defendant 267	ibuydesignerbags.com	X	
23		ibuydesignerjewelry.com	X	
		ibuydesignerwatches.com	X	
24		toptiffanysaleuk.com	X	
25	Defendant 268	itiffanyonsale.com	X	
26	Defendant 269	tiffanyjewelry.name	X	
27		uktiffanyline.com	X	
		jeweleryguideblog.com		X
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1		jeweleryguides.com		X
2	Defendant 270	jeweleryoutlet.org	X	
3	Defendant 271	jewelleryonlineoutlet.com	X	
4		tiffanyoutlet2011.net	X	
5	Defendant 272	jewelry75.com	X	
6		stylejewelry4u.org	X	
7	Defendant 273	jewelryoftiffany.com	X	
8	Defendant 274	jewelrywholesalejewellery.com	X	
9	Defendant 275	jewelry-wholesale-supply.com	X	
10	Defendant 276	keepsupply.com	X	
11	Defendant 277	latest-jewelry.com	X	
12	Defendant 278	lovetiffany1837.com	X	
13	Defendant 279	lovetiffanys.com	X	
14	Defendant 280	lzsaler.org	X	
15	Defendant 281	mac4cosmetics.com	X	
16		maccosmeticsroom.com	X	
17	Defendant 282	malltiffany.com	X	
18	Defendant 283	mydearbag.com	X	
19	Defendant 284	mygoodreplica.com	X	
20	Defendant 285	toptiffanyuk.com	X	
21		tiffanysjewelryuk.com	X	
22		mytiffany.net		X
23		pearltiffany.org		X
24		tifanyfree.info		X
25		tifanyrealse.info		X
26		tifanysales.org		X
27		tifanyus.info		X
28		tiffanygirl.org		X
		tiffanylady.org		X
	Defendant 286	tiffanyjewelrytop.com	X	
		tiffanyjewelryllc.com	X	
		necktieschina.com		X
	Defendant 287	new-tiffany.com	X	
	Defendant 288	newtiffanyjewelry.com	X	
	Defendant 289	wholesalecheapjewelrychina.com	X	

1		nfljerseys4cheap.com	X
2		usajerseywholesale.com	X
3	Defendant 290	offerjewelry.com	X
4	Defendant 291	officialtiffanynecklace.com	X
5		officialtiffanyshop.com	X
6		tiffanybraceletmall.com	X
7	Defendant 292	officialtiffanyoutlet.com	X
8		officialtiffanyoutlets.com	X
9	Defendant 293	oktiffanyjewelry.com	X
10	Defendant 294	olapparel.com	X
11	Defendant 295	onlinetiffanystore.com	X
12	Defendant 296	outletsky.com	X
13	Defendant 297	paypalcoachpurses.com	X
14	Defendant 298	pickjewelry.org	X
15	Defendant 299	pui138.com	X
16	Defendant 300	reispo.com	X
17	Defendant 301	replicatycoon.com	X
18	Defendant 302	replica-watch-shopping.net	X
19	Defendant 303	saletiffanyjewelry.com	X
20	Defendant 304	saletiffanys.com	X
21	Defendant 305	sedanshoppers.com	X
22	Defendant 306	sellbestjewelry.com	X
23	Defendant 307	sellbrandjewelry.com	X
24		supertiffanyjewelry.com	X
25	Defendant 308	sellfashiontiffany.com	X
26	Defendant 309	shoesclothingmarket.com	X
27	Defendant 310	shoesclothingok.com	X
28		shoeclothingok.com	X
	Defendant 311	shopjewelryreplica.com	X
		shopreplicajewelry.com	X
	Defendant 312	silverjewelry1837.com	X
	Defendant 313	simpletiffany.net	X
	Defendant 314	supplytiffany.com	X
	Defendant 315	thetiffanyjewelry.org	X

1	Defendant 316	tiffany4saleus.com	X
2	Defendant 317	tiffany-accessories.com	X
3	Defendant 318	tiffanyand.org	X
4	Defendant 319	tiffanyand-co.com	X
5	Defendant 320	tiffanyandco2011outlet.com	X
6		tiffany-silverjewelry.com	X
7	Defendant 321	tiffanyandcojewellery.com	X
8		tiffany-jewelry-outlet.net	X
9	Defendant 322	tiffanyandcompanyoutlet.com	X
10	Defendant 323	tiffanyandconow.com	X
11	Defendant 324	tiffanyandcoonline.com	X
12	Defendant 325	tiffany-andcooutlet.com	X
13		tiffany-andcooutlet.org	X
14	Defendant 326	tiffanyandco-outlet.net	X
15		tiffanyandco-outlet1.org	X
16		tiffany-outletsale.com	X
17	Defendant 327	tiffanyandcooutlets.org	X
18	Defendant 328	tiffanyandcooutletstore.com	X
19	Defendant 329	tiffanyandcooutlet-usa.com	X
20	Defendant 330	tiffanyandcos.com	X
21	Defendant 331	tiffanyandcoshop.com	X
22		tiffanyboutique.com	X
23		tiffanyjewellery.us	X
24		tiffanystyle.us	X
25	Defendant 332	tiffanybag.com	X
26		tiffany2go.com	X
27	Defendant 333	tiffanybestsilver.com	X
28	Defendant 334	tiffanybrides.com	X
	Defendant 335	tiffany-cartier.com	X
	Defendant 336	tiffanycoaustralia.net	X
		cheaptiffanyaustralia.com	X
	Defendant 337	tiffanycoedge.com	X
	Defendant 338	tiffanycomall.com	X
	Defendant 339	tiffanycomart.com	X

1	Defendant 340	tiffanyco-outlet.com	X	
	Defendant 341	tiffanycooutlet-shop.com	X	
2	Defendant 342	tiffanycoutlet.com	X	
3		itiffanycooutlet.com	X	
4	Defendant 343	tiffanyditty.com	X	
5	Defendant 344	tiffany-home.com	X	
6	Defendant 345	tiffanyhut.com	X	
7	Defendant 346	tiffanyjewellerystores.com	X	
8	Defendant 347	tiffany-jewelry.com	X	
9	Defendant 348	tiffanyjewelryoutlet.com	X	
	Defendant 349	tiffany-jewelry1837.com	X	
	Defendant 350	tiffanyjewelryshop.net	X	
10		tiffanyjewelryboke.com		X
11		tiffanyjewelryweb.net		X
		tiffanysjewelryonline.org		X
12	Defendant 351	tiffanyjewelrybrands.com	X	
13	Defendant 352	tiffanyjewelryco.com	X	
14	Defendant 353	tiffanyjewelryforsale.net	X	
15	Defendant 354	tiffanyjewelry-outlet.org	X	
16	Defendant 355	tiffanyjewelryoutletus.com	X	
		tiffanyjewelryoutletusa.com	X	
17	Defendant 356	tiffanyjewelry-rings.com	X	
18	Defendant 357	tiffanyjewelrys.com	X	
19	Defendant 358	tiffanyjewelryus.net	X	
20	Defendant 359	tiffanyknockoff.com	X	
		tiffanyreplicaoutlet.com	X	
21		tiffanyreplica-outlet.com	X	
22	Defendant 360	tiffany-links.com	X	
		tiffany-co-outlet.com	X	
23	Defendant 361	tiffanyl.com	X	
		tiffanyl.com	X	
24	Defendant 362	tiffanymallus.com	X	
25	Defendant 363	tiffanyme.com	X	
26	Defendant 364	tiffanyonlinediscount.com	X	
27	Defendant 365	tiffanyonlinehome.com	X	

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1	Defendant 366	tiffanyonsaleus.com	X	
	Defendant 367	tiffanyoutlet-online.com	X	
2	Defendant 368	tiffanyoutletsale.com	X	
3	Defendant 369	tiffanyoutletus.com	X	
4		tiffanyoutletsus.com	X	
5	Defendant 370	tiffanyoutlet-usa.com	X	
6	Defendant 371	tiffany-replicas.com	X	
7	Defendant 372	tiffanyscojewelry.com	X	
8	Defendant 373	tiffanyshop03.com	X	
9	Defendant 374	tiffanyshoppingcenter.com	X	
	Defendant 375	tiffanyshop-us.com	X	
10	Defendant 376	tiffanysilveronsale.com	X	
11	Defendant 377	tiffany-silvers.com	X	
		tiffanyummyjewelry.com		X
12	Defendant 378	tiffanywholesaler.com	X	
13		voguehotsale.com	X	
14	Defendant 379	toryburchsoutlet.tk	X	
15	Defendant 380	tp925.com	X	
16	Defendant 381	wgo8.com	X	
17	Defendant 382	wholesalecheapjewelrys.com	X	
		wholesale-cheap-jewelrys.com	X	
18		wholesalejewelrysmart.com	X	
19	Defendant 383	wholesale-coach-bags.com	X	
20		handbagsunglasses.com	X	
21	Defendant 384	wholesalejewelrycenter.com	X	
22	Defendant 385	wholesalejewelrysale.org	X	
23	Defendant 386	wholesaletiffanyoutlets.com	X	
24	Defendant 387	womenmonster.com	X	
25	Defendant 388	x431.org	X	
26	Defendant 389	ztoshop.com	X	
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