

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-62388-CIV-SINGHAL

ADIDAS AG, ADIDAS INTERNATIONAL  
MARKETING B.V., and ADIDAS AMERICA, INC.

Plaintiffs,

v.

THE INDIVIDUALS, BUSINESS ENTITIES AND  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE "A,"

Defendants

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**DEFAULT FINAL JUDGMENT AND PERMANENT INJUNCTION**

**THIS CAUSE** is before the Court following the Court's Order (DE [34]) granting Plaintiffs' Motion for Entry of Default Final Judgment Against Defendants. In accordance with Federal Rule of Civil Procedure 58(a), the Court enters this separate final judgment. Accordingly, it is hereby

**ORDERED AND ADJUDGED** that Default Final Judgment is entered in favor of Plaintiffs, adidas AG, adidas International Marketing B.V., adidas America, Inc. (collectively "Plaintiffs"), and against Defendants, the Individuals, Business Entities and Unincorporated Associations identified on Schedule "A" hereto (collectively, "Defendants") as follows:

1. Permanent Injunctive Relief:

Defendants and their officers, agents, representatives, servants, employees, subsidiaries, distributors, and all persons acting in concert and participation with Defendants 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 and/or using Plaintiffs' trademarks, or confusingly similar trademarks identified in Paragraphs 17 and 18 of the Amended Complaint (DE [20]) (the "adidas Marks");
- b. using the adidas 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 the adidas 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 and from offering such goods in commerce;
- h. otherwise unfairly competing with Plaintiffs;
- i. using the adidas Marks, or any confusingly similar trademarks, on websites, 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 are visible to a computer user or serves to direct computer searches to websites, Internet based e-commerce stores, seller identities or domain names 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. To give practical effect to the Permanent Injunction, the domain names identified on Schedule "A" ("Subject Domain Names") are hereby ordered to be immediately transferred by the corresponding 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) 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. Plaintiffs may serve this injunction on any Internet search engines with a request that they permanently disable, deindex or delist any specific URLs identified by Plaintiffs, based upon Defendants' unlawful activities being conducted via the Subject Domain Names as a whole and via the URLs identified by Plaintiffs;
- c. Plaintiffs may serve this injunction on any e-mail service provider with a request that the service provider permanently suspend the e-mail addresses which are or have been used by the Defendants in connection with Defendants' promotion, offering for sale, and/or sale of goods using counterfeits and/or infringements of the adidas Marks;
- d. Defendants, their agent(s) or assign(s), shall assign in writing all rights, title, and interest, to their Subject Domain Name(s) to Plaintiffs and, if within five (5) 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);
- e. Defendants, their agent(s) or assign(s), shall instruct in writing all search engines to permanently delist or deindex the Subject Domain Name(s) and, if within five (5) 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); and

- f. Upon Plaintiffs' request, Defendants shall request, in writing, permanent termination of any messaging services accounts they own, operate, or control on any messaging service platform.
3. The bond posted by Plaintiffs in the amount of \$10,000.00 is ordered released by the Clerk of Court.
4. The Court retains jurisdiction to enforce this Judgment and permanent injunction.
5. Plaintiffs are ordered to serve a copy of this Order upon Defendants by providing the address to Plaintiffs' designated serving notice website to each Defendant via e-mail to the e-mail accounts provided by that Defendant as part of the data related to its domain name, including customer service e-mail addresses and onsite contact forms, or via the registrar of record for each of the domain names; and by publicly posting a true and accurate copy of this Order on Plaintiffs' designating service notice website appearing at <http://servingnotice.com/D41s9x/index.html>.
6. The Clerk of Court is directed to **CLOSE** this case, and any pending motions are **DENIED AS MOOT**.
7. To the extent not otherwise disposed of, all deadlines are **TERMINATED**.

**DONE AND ORDERED** in Chambers, Fort Lauderdale, Florida, this \_\_\_\_ day of \_\_\_\_\_ 2025.

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RAAG SINGHAL  
UNITED STATES DISTRICT JUDGE

Copies furnished to counsel of record via CM/ECF

**SCHEDULE "A"**  
**DEFENDANTS BY NUMBER AND SUBJECT DOMAIN NAME**

<b>Defendant Number</b>	<b>Defendant / Domain Name</b>
1	allkicks.shop
2	91sheep.net
3	basetao.xyz
4	boolopo.net
5	carlkicks.net
6	cnfactory.co
7	cnfashionbuy.shop
8	cocokicks.xyz
9	cocosneakers.co
10	coolkicks.shoes
11	crewkicks.shoes
12	elevenkicks.co
13	fashionreps.shoes
14	flightkickz.co
15	goosemasterkim.org
16	hicoco.co
17	hypeunique.net
18	joystudio.xyz
19	kickbulk.shop
20	lkkiks.net
21	mangomeee.shop
22	monicasneaker.co
23	mrhou.net
24	ogtony.xyz
25	perfectkicks.shoes
26	popkicks.co
27	repkicks.shoes
28	repsnkrs.co
29	shoesreplica.com
30	sneakershead.net
31	sneakerwill.shoes

32	suprize.shop
33	uaplg.org
34	ua-shoes.net
35	uasneakers.net