

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 23-61084-CIV-SMITH**

ADIDAS AG, *et al.*,

Plaintiffs,

vs.

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

Defendants.

/

**DECLARATION OF VIRGILIO GIGANTE IN SUPPORT OF PLAINTIFFS’
SECOND NOTICE OF IDENTIFICATION OF ADDITIONAL ALIASES FOR
DEFENDANT NUMBERS 19, 24, 25, 35, 48, 51, 66, AND 67 AND ADDITIONAL
FINANCIAL ACCOUNTS USED BY DEFENDANT NUMBERS 10, 11,
12, 15, 17, 18, 19, 24, 25, 29, 34, 35, 36, 38, 44, 48, 50, 51, 53, 55, 56, 57, 66, AND 67**

I, Virgilio Gigante, declare and state as follows:

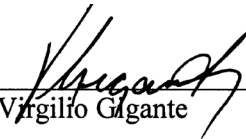
1. I am an attorney duly authorized and licensed to practice law before all courts in the State of Florida and the Southern District of Florida. I am counsel of record for Plaintiffs, adidas AG, adidas International Marketing B.V., and adidas America, Inc. (“Plaintiffs”), in the above captioned action. I submit this Declaration, which is filed in support of Plaintiffs’ Notice of Identification of Additional Alias for Defendant Numbers 19, 24, 35, 48, 51, 66, and 67, and Additional Financial Accounts Used by Defendant Numbers 10, 11, 12, 15, 17, 18, 19, 24, 25, 29, 34, 35, 36, 38, 44, 48, 50, 51, 53, 55, 56, 57, 66, and 67. I am personally knowledgeable of the matters set forth in this declaration and, if called upon to do so, I could and would competently testify to the following facts set forth below.

2. As part of its ongoing investigation regarding the sale of counterfeit and infringing products, Plaintiff discovered that Defendant Numbers 19, 24, 25, 35, 48, 51, 66, and 67, are continuing to engage in and expand their unlawful use of Plaintiffs’ trademarks at issue in

this matter, by registering, operating, and/or maintaining the new alias domain names dopeplugs.cc, perfectplug.cc, kksneaker.ru, sportsjerseysale.com, kicksfreak.vip, rimisneaker.ru, buykicks.me, yoyokicks.me, popyeezy.com, and yyesyeezy.ru, respectively.

3. Pursuant to the Court's Temporary Restraining Order [DE 11] and subsequent Preliminary Injunction [DE 25], the financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to, PayPal, Inc. and Stripe, Inc., identified additional email addresses and other data associated with Defendants, as identified on Schedule "A" hereto.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed January 26, 2024, at Ft. Lauderdale, Florida.


Virgilio Gigante

**DEFENDANT BY NUMBER, E-COMMERCE STORE NAME,
ADDITIONAL FINANCIAL ACCOUNT INFORMATION, ADDITIONAL
USERNAME, BUSINESS NAME, AND E-MAIL ADDRESSES**

Def. No.	Defendant / E-commerce Store Name	Account Information: Payment Account / Payee	Account Information: Merchant ID	Additional Username / Business Name	Additional Email
10	8wholesale.com	chenchen0224520@outlook.com		惠玲 王 CHENCHEN022	8wholesaleservice@gmail.com
11	adyszboots.com	tesatheightmcpua@hotmail.com	GLDXBQWW5BLAW		sd-customer-service@hotmail.com turujhovan6@hotmail.com asni20081992@gmail.com magnum1011@hotmail.com
		tangmankeung@gmail.com	D3H95AYTEL3KN	MAN KEUNG TANG GEE 盛世達商貿有限公司	
		nuyqjncnek@hotmail.com	A4R2D5YD93RQS	Asni Tafrikhatin ASNITAFRIKH Asni Tafrikhatin	
		pescywpbnf@hotmail.com	ABRCGUHFBYHF2		
12	ahasneakers.cn	smy14153893379@163.com		铭阳 孙 SMY14153893	ahasneakers@vip.163.com noreply@notice.mailzh-apolo.com
15	camisetago.com	halehua920@gmail.com	CRJEXU7HSU7TW	少华 郑 SHAMENSHIXI 厦门市翔安区绿康韵茶叶店	support@camisetago.com 615197989@qq.com
17	onlykickz.vip	2668848681@qq.com		航涛 余 2668848681	onlykickz0706@gmail.com
		645665023@qq.com		淇滨 张 645665023	
18	designergunews.xyz	ChenQing_101@163.com		鸿清 陈 CHENQING101	dgu_yolanda@163.com yolanda.designergu@gmail.com lency@designergu.ru
19	dopeplugs.cc	lin126wei@163.com		伟 林 LIN126WEI	sales@dopestkickz.ru joycealin0720@gmail.com
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19	perfectplug.cc	Chen34haiyan@163.com		海燕 陈 CHEN34HAIYA	tinachou2021@gmail.com
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		13107985173@163.com		德成 黄 HUANGDECHE N	huangdecheng2023@outlook.com huangdecheng2023@hotmail.com
25	sportsjerseysale.com	shuaihongmaoyi@proton.me	BNFP5B2JBF8WQ	向弘 吴 FUJIANSHUAI 福建帅弘贸易有限公司	sportsjerseysale@outlook.com sportjerseysale@outlook.com
		hymshangzhan@outlook.com	J5CX8Z3FS4FMN	一鸣 韩 SHANGZHANDI	
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34	kegao.cn	1757990841@qq.com		晓清 杨 1757990841	noreply@notice.mailzh-apolo.com
35	kicksfreake.vip	18144621004@163.com	FMWWPLADB XW26	玉伟 孙 ONLINE SHOP 合肥万凯汽车服务有限公司	service@kicksfreake.vip service@kicksfreake.com
36	kickwho.xyz	Leykeyy@163.com		恩义 林	kickwhoofficial@gmail.com
38	ksafutbol.com	Stripe	CLOTHVAL.COM		info@camisetago.com help@clothval.com receipts+acct_1ndecgjsbiuul1i8@stripe.com
38	rofoot.com	Stripe	CLOTHVAL.COM		info@camisetago.com help@clothval.com receipts+acct_1ndecgjsbiuul1i8@stripe.com
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53	shopowlfashion.com	baduongfenwick97@hotmail.com	ZTGWBQVYP 3JGG	DUONG HOANG BA HOANGBADUON	sales@shopowlfashion.com april26thonganover@gmail.com BethanyMoriah43rbarq@gmail.com info@memorysmith.co.uk laylahkarmallzxzfx@gmail.com mckaylavalentinad9rrx10@gmail.com mckinleytianaoecqlzf@gmail.com Phuquyen11199@gmail.com accounts@jonswift.co.uk celesteaniya0v8fmwn@gmail.com info@despinawandi.com lindamarisolvg88380@gmail.com paytonleiaj2x4bo9@gmail.com
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66	popyezy.com	chenpxw88@163.com	4RCE9WVFEL LRQ	净 陈 SNKER 威宁县灵海商贸 有限公司	popyezyofficial@gmail.com bellil2012@gmx.com
67	yyesyezy.ru	ferrousx@outlook.com	F3SJRXNHLM ZHY	翔 丰 HT 广州韩桐网络科 技有限公司	Yesyezyshoes@hotmail.com worldsneaker1@gmail.com guiying6529@hotmail.com wuguiying828@sina.com
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