

**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.

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**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**

Plaintiffs, adidas AG, adidas International Marketing B.V., and adidas America, Inc., (collectively “Plaintiffs”), by and through their undersigned counsel, hereby notify the Court of an 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 (“Defendants”), as identified on Schedule “A” hereto, to receive money in connection with their respective e-commerce stores operating under their seller names identified on Schedule “A” hereto (the “E-commerce Store Names”). In support thereof, Plaintiffs state as follows:

1. On July 18, 2023, Plaintiffs filed their Amended Complaint [DE 26]. In their Amended Complaint, Plaintiffs pled Defendants use aliases in connection with the operation of their business, including but not limited to those identified on Schedule “A” thereto, and Defendants will likely continue to register or acquire new e-commerce store names, or other aliases, as well as related payment accounts, for the purpose of selling and offering for sale

goods bearing and/or using counterfeit and confusingly similar imitations of one or more of Plaintiffs' trademarks. (See [DE 26] at ¶¶ 11, 15.) Pursuant to the allegations, Plaintiffs now identify the additional e-commerce store names:

- a. dopeplugs.cc and perfectplug.cc as aliases to Defendant Number 19,
- b. kksneaker.ru as an alias to Defendant Number 24,
- c. kicksfreaker.vip as an alias to Defendant Number 35,
- d. rimisneaker.ru as an alias to Defendant Number 48,
- e. buykicks.me and yoyokicks.me as aliases to Defendant Number 51
- f. popyeezy.com as an alias to Defendant Number 66
- g. yyesyeezy.ru, as an alias to Defendant Number 67.

See Declaration of Virgilio Gigante in Support of Plaintiffs' Second Notice of Identification of Additional Aliases 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 ("Gigante Decl. in Support of Second Notice") ¶ 2, filed herewith; Declaration of Kathleen Burns in Support of Plaintiffs' Second Notice of Identification of Additional Aliases 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 ("Burns Decl. in Support of Second Notice") ¶ 5, filed herewith.)

2. On June 9, 2023, Plaintiffs filed their *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets (the "Application for Temporary Restraining Order") [DE 6]. Thereafter on June 22, 2023, the Court entered an Order granting Plaintiffs' Application for Temporary Restraining Order [DE

11] and subsequently converted the Temporary Restraining Order into a Preliminary Injunction on July 6, 2023, [DE 25].

3. In the Court's Temporary Restraining Order and subsequent Preliminary Injunction, the Court ordered, *inter alia*, Defendants and all financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to, PayPal, Inc. ("PayPal"), and Stripe, Inc. ("Stripe"), and their related companies and affiliates, to immediately:

identify all financial accounts and/or sub-accounts, associated with the Internet e-commerce stores operating under the E-commerce Store Names, payees, merchant identification numbers, and/or the e-mail addresses identified on Schedule "A" hereto, as well as any other related accounts of the same customer(s) . . . which transfer funds into the same financial institution account(s) or any of the other financial accounts subject to this Order; (iii) restrain the transfer of all funds, as opposed to ongoing account activity, held or received for their benefit . . . and any other financial accounts tied thereto . . . .

See Preliminary Injunction [DE 25] at pp. 11-12, Para. 6.

4. Plaintiffs discovered 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 are using the additional payment accounts identified on Schedule "A" hereto (the "Additional Payment Account"), to receive money in connection with their respective E-commerce Store Names. (See Burns Decl. in Support of Second Notice ¶ 4 and Composite Exhibit "1" attached thereto.)

5. Accordingly, pursuant to the Court's July 6, 2023 Preliminary Injunction, Plaintiffs requested PayPal and Stripe restrain all funds using Defendants' Additional Payment Accounts. Pursuant to the Court's Preliminary Injunction, PayPal identified additional email addresses and other data associated with Defendants, as listed on Schedule "A" hereto.

DATED: February 1, 2024.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **Virgilio Gigante**

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Attorneys for Plaintiffs

**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
		qinghe970@163.com		庆和 朱 QINGHE970	
		yuan_yuan_yang999@163.com		媛媛 杨 YUANYUANYAN	

19	perfectplug.cc	Chen34haiyan@163.com		海燕 陈 CHEN34HAIYA	tinachou2021@gmail.com
		huang848xu@163.com		旭蓝 黄 HUANG848XU	perfectkickz@fadsway.com alicechan3000@126.com
24	kksneaker.ru	huminmil2023@hotmail.com		明敏 胡 HUMINMIL202	kksneaker@hotmail.com noreply@notice.yycartapps.com
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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	
29	jersey-album.com	ppreciateit@hotmail.com			mikiandkinki@hotmail.com noreply@notice.mailzh-apolo.com
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
44	newsneaker.site		BATDVWEND 52WW		mysneakersservice@outlook.com
48	rimisneaker.ru	rimi9@rimisneaker.com		丽琼 蒋 RIMI9	rimisneaker@gmail.com 18596958786@163.com

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		kesongqin789@outlook.com		松青 柯 KESONGQIN78	
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		majinchun19921022@outlook.com		金春 马 MAJINCHUN19	
		zhangshuo19931031@outlook.com		硕 张 ZHANGSHUO19	
51	yoyokicks.me	Libanghui888@outlook.com		帮荟 李 LIBANGHUI88	service@Yoyokicks.me adi@outlook.com zjrpp1983@outlook.com fetchx001@gmail.com
		zeng888guolin@163.com		国林 曾 ZENG888GUOL	
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
			6BPHUW2JFV K6E	Phu Quyen Nguyen NGUYENPHUQU Nguyen Phu Quyen Pte. Ltd.	
55	snkick.ru	aron22088@outlook.com	GLDXBQWW5 BLAW	明 李 ARON22088	ursnkick@outlook.com 875373102@qq.com
		teg550066@outlook.com		赛聪 洪 TEG550066	
56	snkrkicksair.com	lihekang999@163.com		燕萍 吴 LIHEKANG999	snkrplaza@gmail.com roland033629@gmail.com moolecolew@gmail.com

57	snrktap1.com	yonghaojs@163.com		德林 周 YONGHAOJINS 芜湖市永豪金属 门窗有限公司	roland033629@gmail.com snrkshop@gmail.com maxsnrks@gmail.com moolecolew@gmail.com
		sales1@eucrown.com		美玲 王 SALES1	
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
		du78sk@outlook.com	8ZEKQNSJHZ FK4	桂英 伍 DU78SK	



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 1, 2024, a true copy of the foregoing was served upon Defendants via the e-mail addresses at which Defendants were served, and by posting copies of the same on Plaintiffs' designated service notice website appearing at the URL <https://servingnotice.com/Da30w4k/index.html>.

**Virgilio Gigante**

Virgilio Gigante