

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 23-62059-CIV-SMITH**

TAYLOR MADE GOLF COMPANY, INC., *et al.*,

Plaintiffs,

vs.

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

Defendants.

**DECLARATION OF KATHLEEN BURNS IN SUPPORT OF PLAINTIFFS'
NOTICE OF IDENTIFICATION OF ADDITIONAL ALIASES FOR DEFENDANT
NUMBERS 4, 7, 12 AND ADDITIONAL FINANCIAL ACCOUNTS USED BY
DEFENDANT NUMBERS 1, 4, 7, 10, 12, 16, AND 26**

I, Kathleen Burns, state and declare as follows:

1. I am over 18 years of age and have personal knowledge of the truth of the matters set forth herein. I submit this Declaration in support of Plaintiffs' Notice of Identification of Additional Aliases for Defendant Numbers 4, 7, and 12 and Additional Financial Accounts Used by Defendant Numbers 1, 4, 7, 10, 12, 16, and 26. 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. I am president of Invisible Inc, a licensed private investigative firm, and I've been an investigator since 2012.

3. Counsel for Plaintiffs, Taylor Made Golf Company, Inc., Acushnet Company, Karsten Manufacturing Corporation, and Topgolf Callaway Brands Corp. ("Plaintiffs"), retained my firm to investigate the ongoing sale of counterfeit versions of Plaintiffs' products by Defendants, the Individuals, Business Entities, or Unincorporated Associations identified on

Schedule “A” hereto (“Defendants”), and to document Defendants’ respective payment account data for receipt of funds paid to Defendants for the sale of counterfeit versions of Plaintiffs’ branded products.

4. Prior to filing this Declaration, my firm accessed Defendants’ Internet based e-commerce stores operating under their seller names identified on Schedule “A” hereto (the “E-commerce Store Names”). Upon accessing the e-commerce stores, my firm was able to view products bearing and/or using one or more of Plaintiffs’ trademarks, add products to the online shopping cart, proceed to a point of checkout, and otherwise actively exchange data electronically with Defendants. My firm then placed an order from each Defendant for the purchase of a product – bearing or using one or more of Plaintiffs’ trademarks at issue in this action. The orders were processed entirely online and following the submission of the orders, my firm received information for finalizing payment for the products via PayPal, Inc. to Defendants’ newly identified financial information (the “Additional Financial Information”), identified on Schedule “A” hereto. True and correct copies of the web pages my firm captured and downloaded showing the items bearing Plaintiffs’ trademarks ordered via Defendants’ E-commerce Store Names, together with redacted copies of the order summary web page, order confirmation, payment account data, and e-mail correspondence exchanged, are attached hereto as Composite Exhibit “1.”¹

5. In connection with the investigation, my firm discovered that Defendant Defendants 88silvery.com (Defendant Number 4), blinkenzo.com a/k/a tagotee.net (Defendant Number 7), and kybershop.com (Defendant Number 12) continued to engage in and expand their

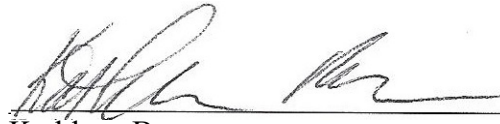
¹ Also included in Composite Exhibit 1 are true and correct copies of additional web pages my firm captured for Defendant Number 20’s E-commerce Store Name storeclearance-us.com, which were inadvertently omitted from Composite Exhibit “1” to my Declaration in Support of Plaintiffs’ Ex Parte Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets [DE 6-11].

unlawful use of Plaintiffs' trademarks at issue in this matter, by registering, operating, and/or maintaining the new alias domain names nexocorners.com, tagotee.store, and kybershop.net, respectively. This determination is based on the following data:

- a. Defendant Number 4 - 88silvery.com a/k/a nexocorners.com: Defendant Number 4's website operating under the e-commerce store name 88silvery.com and Defendant Number 4's website operating under the new alias e-commerce store name nexocorners.com share the same contact e-mail address, support@nexocorner.com.
- b. Defendant Number 7 - blinkenzo.com a/k/a tagotee.store: upon accessing Defendant Number 7's website operating under the e-commerce store name blinkenzo.com and adding a product to the cart, my firm was automatically redirected and forwarded to Defendant Number 7's website operating under its alias e-commerce store name tagotee.net, and then was automatically redirected and forwarded to Defendant Number 7's website operating under the new alias e-commerce store name tagotee.store to finalize payment.
- c. Defendant Number 7 - tagotee.net a/k/a tagotee.store: upon accessing Defendant Number 7's website operating under the e-commerce store name tagotee.net and adding a product to the cart, my firm was automatically redirected and forwarded to Defendant Number 7's website operating under the new alias e-commerce store name tagotee.store to finalize payment.
- d. Defendant Number 12 - kybershop.com a/k/a kybershop.net: upon accessing Defendant Number 12's website operating under the e-commerce store name kybershop.com and adding a product to the cart, my firm was automatically

redirected and forwarded to Defendant Number 12's website operating under the new alias e-commerce store name kybershop.net to finalize payment.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed September 13, 2024, at Scottsdale, Arizona.



Kathleen Burns

SCHDULE “A”
DEFENDANT BY NUMBER, E-COMMERCE STORE NAME, AND
ADDITIONAL FINANCIAL ACCOUNT INFORMATION, AND E-MAIL ADDRESSES

Def. No.	Defendant / E-commerce Store Name	Account Information: Payment Account / Merchant ID	Account Information: Payee	Additional E-mail Address
1	showdomall.shop	9KLTBUWYSZ6KL	LapinskaJoan162@gmail.com	
4	88silvery.com a/k/a nexocorners.com	BRWXMCSL2FTMJ	support@nexocorner.com	support@nexocorner.com
7	blinkenzo.com a.k.a. tagotee.store	W94P3ZT9DGY4S		admin@blinkenzo.com sales@tagotee.net
7	tagotee.net a.k.a tagotee.store	534J7L62A5L5W		sales@tagotee.net
10	gifnestbuyus.com	WQ3V59VWLDTPY		support@gifnestbuys.com
12	kybershop.com a/k/a kybershop.net	7Z2UUNMBJCKK6		admin@kybershop.com
16	new-golfstore.com	4ZJHMD5TS8UW4 ZH4L3JM3DJW58		admin@new-golfstore.com
26	proactiveping.com	R4TPTNWBDH9XY	Online Shop	admin@kayinhome.com
		KF77ZRMW4BHQL	Online Shop	
		UKZAB6LHZQR8Y	Online Shop	
		CFSBPJVZ9RXCXY	Online Shop	
		5G4GW78AYZCPN	Online Shop	
		2M7PSSUA4M4AS	Online Shop	
		WNBKL68R3PTRY		
		HYHEBX7L89DQG		
		NHKUBEBNT6782	6l5e7e@gmailhf.com	