

**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.

**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**

Plaintiffs, Taylor Made Golf Company, Inc., Acushnet Company, Karsten Manufacturing Corporation, and Topgolf Callaway Brands Corp., (collectively “Plaintiffs”), by and through their undersigned counsel, hereby notify the Court of an 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 (“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 October 30, 2023, Plaintiffs filed their Complaint [DE 1]. In their 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 1] at ¶¶ 13, 17.) Pursuant to the allegations, Plaintiffs now identify the additional e-commerce store names:

- a. nexocorners.com as an alias to Defendant Number 4.
- b. tagotee.store as an alias to Defendant Number 7.
- c. kybershop.net as an alias to Defendant Number 12.

(See Declaration of Kathleen Burns 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 ("Burns Decl. in Support of Notice") ¶ 5, filed herewith.)

2. On November 1, 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 April 30, 2024, the Court entered an Order granting Plaintiffs' Application for Temporary Restraining Order [DE 10].

3. In the Court's Temporary Restraining Order, 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 Temporary Restraining Order [DE 10] at p. 15, Para. 6.

4. Plaintiffs discovered Defendant Numbers 1, 4, 7, 10, 12, 16, and 26 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 Notice ¶ 4 and Composite Exhibit “1” attached thereto.)

5. Accordingly, pursuant to the Court’s April 30, 2024 Temporary Restraining Order, Plaintiffs requested PayPal restrain all funds using Defendants’ Additional Payment Accounts.

DATED: October 8, 2024.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **Virgilio Gigante**

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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
		KF77ZRMW4BHQ	Online Shop	
		UKZAB6LHZQR8Y	Online Shop	
		CFSBPJVZ9RXC	Online Shop	
		5G4GW78AYZCPN	Online Shop	
		2M7PSSUA4M4AS	Online Shop	
		WNBKL68R3PTRY		
		HYHEBX7L89DQG		
		NHKUBEBNT6782	615e7e@gmailhf.com	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 8, 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/Fa8o30/index.html>.

Virgilio Gigante

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