

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 23-61007-CIV-SMITH**

GUCCI AMERICA, INC.,

Plaintiff,

vs.

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

Defendants.

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**PLAINTIFF’S *EX PARTE* APPLICATION FOR ENTRY OF  
TEMPORARY RESTRAINING ORDER, PRELIMINARY INJUNCTION,  
AND ORDER RESTRAINING TRANSFER OF ASSETS  
AND MEMORANDUM OF LAW IN SUPPORT THEREOF**

Plaintiff, Gucci America, Inc. (“Gucci” or “Plaintiff”), hereby does apply, on an *ex parte* basis, for entry of a temporary restraining order and an order restraining transfer of assets, and upon expiration of the temporary restraining order, a preliminary injunction against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule “A” hereto (“Defendants”) pursuant to 15 U.S.C. § 1116, Fed. R. Civ. P. 65, The All Writs Act, 28 U.S.C. § 1651(a), and this Court’s inherent authority. In support thereof, Gucci submits the following memorandum of law.

**I. INTRODUCTION**

Defendants are knowingly and intentionally promoting, advertising, distributing, offering for sale, and selling goods bearing and/or using counterfeits and confusingly similar imitations of Gucci’s registered trademarks within this district and throughout the United States by operating Internet based e-commerce stores under the seller names identified on Schedule “A” hereto (the “E-commerce Store Names”). Specifically, Gucci has obtained evidence clearly demonstrating that Defendants (a) are engaged in the advertising, offering for sale, and sale of counterfeit and infringing versions of Gucci’s goods; and (b) accomplish their sales of counterfeit and infringing goods via the Internet using, at least, e-commerce stores operated under the E-commerce Store Names. Based on this evidence, Gucci’s Complaint alleges claims for trademark counterfeiting

and infringement, false designation of origin, cybersquatting, common law unfair competition, and common law trademark infringement.

Defendants' unlawful activities deprive Gucci of its right to determine the way its trademarks are presented to the public. Indeed, Defendants have and continue to wrongfully trade and capitalize on Gucci's reputation and goodwill and the commercial value of Gucci's trademarks. By their activities, Defendants are defrauding Gucci, certain non-party businesses, and consumers for their own benefit. Defendants should not be permitted to continue their unlawful activities, which are causing Gucci ongoing irreparable harm. Accordingly, Gucci is seeking entry of a temporary restraining order prohibiting Defendants' further wrongful use of Gucci's trademarks.

Gucci also seeks to restrain Defendants' unlawful profits. Gucci has obtained evidence that Defendants use money transfer and retention services with PayPal, Inc. ("PayPal") or have their payments processed on their behalf by Stripe, Inc. ("Stripe") to accept payment for the sale of their counterfeit products. The Lanham Act allows Gucci to recover the unlawful profits gained through Defendants' distribution and sales of counterfeit and infringing goods. See 15 U.S.C. § 1117(a). Considering the inherently deceptive nature of the counterfeiting business, Gucci has good reason to believe Defendants will hide or transfer their ill-gotten assets beyond the jurisdiction of this Court unless they are restrained. Accordingly, to preserve the disgorgement remedy and all other equitable remedies available to Plaintiff, Gucci seeks an *ex parte* order restraining Defendants' assets, including specifically, funds transmitted through PayPal and Stripe.

## **II. STATEMENT OF FACTS**

### **A. Plaintiff's Rights.**

Gucci is the owner of all rights in and to the federally registered trademarks identified in Paragraph 5 of the Declaration of Sydney Kipen in Support of Plaintiff's Application for Temporary Restraining Order (the "Gucci Marks"), which are used in connection with the manufacture and distribution of high-quality goods in the categories identified therein. (See Declaration of Sydney Kipen in Support of Plaintiff's Application for Temporary Restraining Order ["Kipen Decl."] ¶¶ 4-5, filed herewith; see also United States Trademark Registrations for the Gucci Marks [the "Gucci Trademark Registrations"] attached as Comp. Ex. 1 to the Complaint, [DE 1-2], incorporated herein by reference.) The Gucci Marks are symbols of

Gucci's quality, reputation, and goodwill and have never been abandoned. (See Kipen Decl. ¶¶ 6-7.) Gucci expends substantial resources developing, advertising, and otherwise promoting its trademarks. (Id.) Thus, the Gucci Marks are famous marks as the term is used in 15 U.S.C. § 1125(c)(1).

Furthermore, Gucci extensively uses, advertises, and promotes the Gucci Marks in the United States in interstate commerce in association with its high-quality goods, and has carefully monitored and policed the use of the Gucci Marks. (See Kipen Decl. ¶¶ 6-8.) As a result of Gucci's efforts, the Gucci Marks have acquired fame in the consumer market. (Id.) The Gucci Marks are widely recognized trademarks among consumers in the United States, and the trademarks have achieved secondary meaning. (Id.) The Gucci Marks have come to symbolize the enormous goodwill of Gucci's genuine products throughout the United States. (Id.) At all times relevant hereto, Defendants have been aware of Gucci's (a) ownership of the Gucci Marks; (b) exclusive rights to use such Marks; and (c) substantial goodwill embodied in, and favorable recognition for, the Gucci Marks.

**B. Defendants Wrongfully Use Plaintiff's Trademarks.**

Defendants do not have, nor have they ever had, the right or authority to use the Gucci Marks for any purpose. (Kipen Decl. ¶¶ 9, 12-13.) However, despite their known lack of authority to do so, Defendants are concurrently promoting and otherwise advertising, distributing, offering for sale, and/or selling, through their respective E-commerce Store Names, goods bearing counterfeit and infringing trademarks that are exact copies of one or more of the Gucci Marks, without authorization ("Defendants' Goods"). (Kipen Decl. ¶¶ 9-13; Declaration of T. Raquel Wiborg-Rodriguez in Support of Plaintiff's *Ex Parte* Application for Entry of Temporary Restraining Order ["Wiborg-Rodriguez Decl."] ¶¶ 2-3, filed herewith; Declaration of Kathleen Burns in Support of Plaintiff's *Ex Parte* Application for Entry of Temporary Restraining Order ["Burns Decl."] ¶ 4, filed herewith; see also relevant web page captures from Defendants' e-commerce stores operating under the E-commerce Store Names displaying the Gucci branded items offered for sale attached as Comp. Ex. 1 to the Burns Decl.)

Given Defendants' slavish copying of the Gucci Marks, Defendants' Goods offered for sale and sold under identical marks are indistinguishable to consumers, both at the point of sale and post-sale. Additionally, by using the Gucci Marks, Defendants have created a false association between their counterfeit and infringing goods and e-commerce stores and Gucci.

Such false association is in violation of 15 U.S.C. § 1125(a) and is causing and will continue to cause Gucci irreparable injury. (See Kipen Decl. ¶¶ 8, 24.)

As part of its ongoing investigation regarding the sale of counterfeit and infringing products, Gucci's counsel retained Invisible Inc, a licensed private investigative firm, to investigate the promotion and sale of counterfeit and infringing Gucci-branded products by Defendants and to obtain the available payment account data for receipt of funds paid to Defendants for the sale of counterfeit Gucci branded products. (Kipen Decl. ¶ 10; Wiborg-Rodriguez Decl. ¶ 2; Burns Decl. ¶ 3.) Invisible Inc accessed the Internet based e-commerce stores operating under each of Defendants' E-commerce Store Names, placed an order for the purchase of a product from each e-commerce store bearing counterfeits of, at least, one of the Gucci Marks at issue, and requested the products be shipped to an address in the Southern District of Florida. (See Burns Decl. ¶ 4.) Each order was processed entirely online<sup>1</sup> and following the submission of the orders, Invisible Inc received information for finalizing payment<sup>2</sup> for the products ordered from Defendants to their respective payment accounts, identified on Schedule "A."<sup>3</sup> (Burns Decl. ¶ 4 and Comp. Ex. 1 thereto.) The detailed web page captures and images of the Gucci branded products ordered via Defendants' E-commerce Store Names were sent to Gucci for inspection. (See Burns Decl. ¶ 4; Kipen Decl. ¶ 11; Wiborg-Rodriguez Decl. ¶ 2.)

Gucci's representative, Ms. Kipen, who is trained to identify the distinctions between genuine Gucci branded merchandise and counterfeit copies of the same, reviewed and visually inspected the Gucci-branded goods offered for sale and ordered by Invisible Inc by reviewing the Internet based e-commerce stores operating under each of the E-commerce Store Names or the

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<sup>1</sup> Certain Defendants use their E-commerce Store Names in tandem with image hosting websites and electronic communication via private messaging applications and/or services to complete their offer and sale of counterfeit and infringing Gucci-branded products. (See Burns Decl. ¶ 4, n.1.)

<sup>2</sup> Invisible Inc was instructed to not transmit the funds to finalize the sale for the orders for some of the Defendants so as to avoid adding money to Defendants' coffers. (See Wiborg-Rodriguez Decl. ¶ 2 n.1; Burns Decl. ¶ 4, n.2.)

<sup>3</sup> Certain Defendants also provided contact e-mail addresses in connection with their E-commerce Store Names, which are included on Schedule "A" hereto. (See Wiborg-Rodriguez Decl. ¶ 3; Burns Decl. ¶ 4 n.3.)

detailed web page captures thereof, and determined the products were are unauthorized copies of genuine Gucci products. (See Kipen Decl. ¶¶ 12-13.)

Section 45 of the Lanham Act defines a “counterfeit” as “a spurious mark which is identical with, or substantially indistinguishable from, a registered mark.” 15 U.S.C. § 1127. Also, using the “ocular test” of direct comparison, courts have found that even marks that are slightly modified from the registered marks copied are to be considered counterfeit marks. See Fimab-Finanziaria Maglificio vs. Helio Import/Export, Inc., 601 F. Supp. 1 (S.D. Fla. 1983). A comparison of the Gucci Marks to the marks used by Defendants in connection with the promotion and sale of Defendants’ Goods reveals the obvious counterfeit and infringing nature of Defendants’ Goods. (Compare Gucci’s Trademark Registrations [Comp. Ex. 1 to the Compl.] with Defendants’ E-commerce Store Names [Comp. Ex. 1 to the Burns Decl.].) Defendants’ Goods are being promoted, advertised, offered for sale, and sold by Defendants to consumers within this district and throughout the United States. (See Burns Decl. ¶ 4.) Defendants are profiting by preying upon consumers, many of whom have no knowledge Defendants are defrauding them. Defendants’ activities amount to nothing more than unlawful operations, infringing on Gucci’s intellectual property rights. The E-commerce Store Names and associated payment accounts are a substantial part of how Defendants further their scheme and cause harm to Gucci.

**C. Defendants Unfairly Compete with and Cause Indivisible Harm to Plaintiff.**

Defendants are all using counterfeits and infringements of Gucci’s famous name and the Gucci Marks to make their e-commerce stores appear more relevant and attractive to consumers shopping for genuine Gucci products online. While each Defendant causes direct individual harm to Gucci, the combined effect of Defendants’ unlawful activities functions as a force multiplier to cause Gucci a single indivisible harm. (Kipen Decl. ¶¶ 16, 21-23.) In other words, they are all logically part of the same occurrence. Defendants are therefore properly joined in this action pursuant to Fed. R. Civ. P. 20. See Bose Corp. v. The P’ships and Unincorporated Ass’ns Identified on Schedule “A”, 334 F.R.D. 511 (N.D. Ill. Feb. 19, 2020) (holding that the combined effect of the individual harm suffered by a plaintiff from online counterfeiters creates injuries to the plaintiff in the aggregate constituting an occurrence under Rule 20.)

Specifically, genuine Gucci branded goods are widely legitimately advertised, promoted, offered for sale, and discussed by Gucci and unrelated third parties via the Internet. (Kipen Decl.

¶ 14.) Visibility on the Internet, particularly via search engines and social media platforms, is important to Gucci's overall marketing and consumer education efforts. (Id. at ¶ 15.) Gucci expends significant resources on Internet marketing and consumer education regarding its products, including search engine optimization, search engine marketing, and social media strategies, which allow Gucci and others to fairly and legitimately educate consumers about the value associated with the Gucci brand and the goods sold thereunder and the problems associated with the counterfeiting of Gucci's trademarks. (Id.; see also Compl. ¶ 23.)

Counterfeiters like Defendants embrace similar marketing strategies to Gucci and are concurrently leveraging it to cause greater and more significant harm to Gucci. The combination of all Defendants engaging in the same exact illegal activity for the same purpose over the same time span causes Gucci irreparable harm in a way that the individual actions occurring alone might not. See, e.g., Bose Corp., 334 F.R.D. at 517 (“[Plaintiff] does not perceive any one counterfeiter to be the problem. Each injury by itself is relatively inconsequential to [Plaintiff]. Rather, it is the injuries in the aggregate . . . that is harmful and from which [Plaintiff] seeks shelter.”) Defendants are jointly and concertedly harming Gucci's marketing efforts on the Internet by blocking and consistently increasing the cost of online visibility for Gucci's legitimate, authorized e-commerce website. (Kipen Decl. ¶ 22.) Moreover, the combination of Defendants' unlawful activities increases Plaintiff's cost to market its genuine goods and educate consumers about its brand. Id.; see Bose Corp., 334 F.R.D. at 517 (“[Seeking relief against each member of the swarm one by one defies common sense, because it is the swarm—the fact that all Defendants are attacking at once—that is the defining aspect of the harm from which [Plaintiff] seeks relief..”.)

Defendants, each of whom is likely aware of the existence of the illegal marketplace and the activities of the others to perpetuate the same, are combining the force of their actions to cause individual, concurrent, and indivisible harm to Gucci and consumers. (See Kipen Decl. ¶¶ 16-23; Compl. ¶¶ 40-41.) See also Bose Corp., 334 F.R.D. at 517 (“Joinder of all defendants who are part of the swarm attacking [Plaintiff's] trademarks flows easily from conceptualizing the swarm as the relevant Rule 20 ‘occurrence.’”) By engaging in market building strategies based upon an illegal use of the Gucci Marks, Defendants are obliterating the otherwise open and available marketplace space in which Gucci has the right to fairly market its goods and associated message. Through their combined concurrent actions, Defendants are causing

individual, concurrent, and indivisible harm to Gucci and the consuming public by (i) depriving Gucci and other third parties of the ability to fairly compete for space within marketing results, (ii) causing an overall degradation of the value of the goodwill associated with the Gucci Marks, and (iii) increasing Gucci's overall cost to market its goods and educate consumers about its brand via the World Wide Web. (Kipen Decl. ¶ 23.) See also Bose Corp., 334 F.R.D. at 517 ("From the plaintiff's perspective . . . it is irrelevant whether the swarm is intentionally coordinated or simply a product of market forces enabled by the internet.")

Meaningful space on the World Wide Web, including marketplace and social media advertisement space, is akin to real estate – there is only so much of it available. E-commerce operators, including Gucci and Defendants, spend significant resources incorporating concepts and popular search terms, such as the Gucci Marks, into their on-site and off-site content and advertising to promote visibility on the World Wide Web. A significant part of relevant market targeting involves reaching a specific demographic or profile based upon a user's search terms. (See Kipen Decl. ¶ 22.) Gucci is doing so through the use of its trademarks in which it has made a substantial economic investment, and Defendants are doing so through subterfuge and unlawful use of the Gucci Marks. Each Defendant is helping to create and maintain the overall illicit marketplace where they market and sell their respective goods and confuse consumers.

Gucci, its trademark rights, and associated goodwill are suffering death by 1,000 cuts caused by the combined force of all Defendants' individual but concurrent unlawful activities. The combined force and effect of all of Defendants' actions are causing the single indivisible harm of the mass consumer confusion and the denial of Gucci's right to fairly compete for visibility on the World Wide Web.

### **III. ARGUMENT**

#### **A. A Temporary Restraining Order is Essential to Prevent Immediate Injury.**

Rule 65(b) of the Federal Rules of Civil Procedure provides, in part, that a temporary restraining order may be granted without written or oral notice to the opposing party or that party's counsel where "specific facts in an affidavit . . . clearly show that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition." FED. R. CIV. P. 65(b). This is such a case.

Defendants fraudulently promote, advertise, offer to sell, and sell goods bearing counterfeits and infringements of the Gucci Marks via their e-commerce stores using the E-

commerce Store Names. By their actions, Defendants are creating a false association in the minds of consumers between Defendants and Gucci. Specifically, Defendants are wrongfully using counterfeits and infringements of the Gucci Marks to increase consumer traffic to their illegal operations. The entry of a temporary restraining order will serve to immediately stop Defendants from benefiting from their wrongful use of the Gucci Marks and would preserve the status quo until such time as a hearing can be held. See Dell Inc. v. BelgiumDomains, LLC, Case No. 07-22674 2007 WL 6862341, at \*2 (S.D. Fla. Nov. 21, 2007) (finding *ex parte* relief more compelling where Defendants' scheme "is in electronic form and subject to quick, easy, untraceable destruction by Defendants").

Absent a temporary restraining order without notice, Defendants can and, based upon Gucci's counsel's past experience, will likely significantly alter the status quo before the Court can determine the parties' respective rights. In particular, the Internet based e-commerce stores at issue are under Defendants' complete control. Thus, Defendants can change the ownership or modify e-commerce store data and content, change payment accounts, redirect consumer traffic to other seller identification names, and transfer assets and ownership of the E-commerce Store Names. (See Wiborg-Rodriguez Decl. ¶ 4.) Such modifications can happen in a short span of time after Defendants are provided with notice of this action. (Id.) Thus, Defendants can easily electronically transfer and secret the funds sought to be restrained if they obtain advance notice of Plaintiff's Application for Temporary Restraining Order and thereby thwart the Court's ability to grant meaningful relief and can completely erase the status quo. (Id.) As Defendants engage in illegal counterfeiting and infringing activities, Gucci has no reason to believe Defendants will make their assets available for recovery pursuant to an accounting of profits and other equitable remedies or will adhere to the authority of this Court any more than they have adhered to federal trademark law. (Id.)

Moreover, federal courts have long recognized that civil actions against counterfeiters – whose very businesses are built around the deliberate misappropriation of rights and property belonging to others – present special challenges that justify proceeding on an *ex parte* basis. Columbia Pictures Indus., Inc. v. Jasso, 927 F. Supp. 1075, 1077 (N.D. Ill. 1996) (observing that "proceedings against those who deliberately traffic in infringing merchandise are often useless if notice is given to the infringers"); Apple Corps Ltd. v. Individuals, P'ships & Unincorporated Ass'ns Identified on Schedule "A", No. 21-60377-CIV-SMITH, 2021 U.S. Dist. LEXIS 115770



(S.D. Fla. March 1, 2021) (order granting plaintiffs a temporary restraining order and restraining defendants' assets and defendants' related assets). This Court should prevent an injustice from occurring by issuing an *ex parte* temporary restraining order which precludes Defendants from continuing to display their infringing content or modifying or deleting any related content or data. Only such an order will prevent ongoing irreparable harm and maintain the status quo.

**B. Standard for Temporary Restraining Order and Preliminary Injunction.**

In this Circuit, the standard for obtaining a temporary restraining order and the standard for obtaining a preliminary injunction are the same. See Emerging Vision, Inc. v. Glachman, Case No. 10-cv-80734, 2010 WL 3293346, at \*3 (S.D. Fla. June 29, 2010) (citing Siegel v. LePore, 120 F. Supp. 2d 1041 (S.D. Fla. 2000) aff'd 234 F.3d 1163 (11th Cir. 2000)). In order to obtain a temporary restraining order or a preliminary injunction, a party must establish (1) a substantial likelihood of success on the merits; (2) that irreparable injury will be suffered if the relief is not granted; (3) that the threatened injury outweighs the harm the relief would inflict on the non-movant; and (4) that entry of the relief would serve the public interest. Schiavo ex rel. Schindler v. Schiavo, 403 F.3d 1223, 1225-26 (11th Cir. 2005); see also Levi Strauss & Co. v. Sunrise Int'l Trading Inc., 51 F.3d 982, 985 (11th Cir. 1995) (affirming entry of preliminary injunction and freezing of assets). Gucci's evidence establishes all of the relevant factors.

**1. Probability of Success on the Merits of Gucci's Claims.**

**a) Likelihood of Success on Counterfeiting Claim.**

Title 15 U.S.C. § 1114 provides liability for trademark infringement if, without the consent of the registrant, a defendant uses "in commerce any reproduction, counterfeit, copy, or colorable imitation of a registered mark in connection with the sale, offering for sale, distribution, or advertising of any goods or services on or in connection with which such use is likely to cause confusion, or to cause mistake, or to deceive." 15 U.S.C. § 1114 (2018). Gucci must demonstrate (1) ownership of the trademarks at issue; (2) Defendants' use of the trademarks is without Gucci's authorization; and (3) Defendants' use is likely to cause confusion, mistake, or deception as to the source, affiliation, or sponsorship of Defendants' Goods. See 15 U.S.C. § 1114(1). Gucci's evidence satisfies these requirements.

The first two elements of Gucci's trademark counterfeiting and infringement claims are easily met. The Gucci Marks are owned by Gucci and registered on the Principal Register of the United States Patent and Trademark Office, and all but three of the marks at issue herein have

become “incontestable” under 15 U.S.C. §§ 1058 and 1065.<sup>4</sup> (See Kipen Decl. ¶ 5; see also Gucci Trademark Registrations, attached as Comp. Ex. 1 to the Compl.) See Ocean Bio-Chem, Inc. v. Turner Network Television, Inc., 741 F. Supp. 1546, 1554 (S.D. Fla. 1990) (“Incontestable status provides conclusive evidence of the registrant’s exclusive right to use the registered mark, subject to §§ 15 and 33(b) of the Lanham Act.”). Moreover, Defendants have never had the right or authority to use the Gucci Marks. (Kipen Decl. ¶¶ 9, 12-13.)

The Eleventh Circuit uses a seven-factor test in determining the third element, likelihood of confusion. See Ross Bicycles, Inc. v. Cycles USA, Inc., 765 F.2d 1502, 1506 (11th Cir. 1985). These factors, as outlined in Safeway Store, Inc. v. Safeway Discount Drugs, Inc., are: (1) the strength of the mark; (2) the similarity of marks; (3) the similarity of the goods; (4) similarity of the sales methods; (5) the similarity of advertising media; (6) defendant’s intent; and (7) evidence of actual confusion. See 675 F.2d 1160, 1164 (11th Cir. 1982); see also Lipscher v. LRP Publ’ns, Inc., 266 F.3d 1305, 1303 (11th Cir. 1997). The seven factors listed are to be weighed and balanced and no single factor is dispositive. (Id.)

#### **(1) Strength of the Marks.**

A trademark’s strength is determined by viewing the mark in its entirety as it appears in the marketplace. See Lone Star Steakhouse and Saloon, Inc. v. Longhorn Steaks, Inc., 106 F.3d 355, 362 (11th Cir. 1997). The spectrum of protectability and strength for trademarks is divided into four primary types of designations: (1) coined, fanciful or arbitrary; (2) suggestive; (3) descriptive; and (4) generic. See Two Pesos, Inc. v. Taco Cabana, Inc., 505 U.S. 763, 768, 112 S. Ct. 2753, 120 L.Ed.2d 615 (1992). Arbitrary or fanciful marks are the strongest and deemed inherently distinctive and entitled to protection. (See id.) It cannot be seriously disputed that the Gucci Marks are strong, arbitrary and fanciful marks. (See Kipen Decl. ¶ 5; see also Gucci Trademark Registrations, attached as Comp. Ex. 1 to the Compl.)

The Gucci Marks have also acquired secondary meaning. Gucci expends substantial resources developing, advertising and otherwise promoting the Gucci Marks. (Kipen Decl. ¶¶ 6-7.) The Gucci Marks enjoy widespread recognition and are prominent in the minds of consumers. Indeed, products bearing the Gucci Marks are among the most widely recognized trademarks in the United States. (Id.)

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<sup>4</sup> Trademark Registrations 5,688,492, 5,921,104, and 6,073,427 are not incontestable.

**(2) Similarity of the Marks.**

Likelihood of confusion is greater when an infringer uses the exact trademark. Turner Greenberg Assocs. v. C & C Imps., 320 F. Supp. 2d 1317, 1332 (S.D. Fla. 2004). Defendants are using marks that are identical to the Gucci Marks. (Compare Gucci's Trademark Registrations [Comp. Ex. 1 to the Compl.] with Defendants' infringing marks [E-commerce Store Names, attached as Comp. Ex. 1 to the Burns Decl.].)

**(3) Similarity of the Goods.**

"The greater the similarity between the products and services, the greater the likelihood of confusion." John H. Harland Co. v. Clarke Checks, Inc., 711 F.2d 966, 976 (11th Cir. 1983). Defendants are selling the same types of goods Gucci sells. (Kipen Decl. ¶¶ 4-5; see generally Defendants' E-commerce Store Names attached as Comp. Ex. 1 to the Burns Decl.) Because they bear counterfeits of the Gucci Marks, Defendants' Goods appear virtually identical to Gucci's genuine products in the consumer market. Standing alone, this similarity can be held sufficient to establish a likelihood of confusion. See John H. Harland Co., 711 F.2d at 976.

**(4) Similarity of Sales Method and (5) Advertising Method.**

Convergent marketing channels increase the likelihood of confusion. See Turner Greenberg Assocs., 320 F. Supp. 2d at 1332. Both Gucci and Defendants sell and advertise their products using at least one of the same marketing channels, the Internet, in the same geographical distribution areas within the United States, including the Southern District of Florida. (See Kipen Decl. ¶ 6; Burns Decl. ¶ 4.) Thus, the conditions of purchase for both parties are unmistakably identical. Moreover, both target the same general U.S. consumers, and as such, Gucci is directly competing with Defendants' products.

**(6) Defendants' Intent.**

This district has held that when an alleged infringer adopts a mark "with the intent of obtaining benefit from the plaintiff's business reputation, 'this fact alone may be sufficient to justify the inference that there is confusing similarity.'" Turner Greenberg Assocs., 320 F. Supp. 2d at 1333 (citing Carnival Corp. v. Seaescape Casino Cruises, Inc., 74 F. Supp. 2d 1261, 1268 (S.D. Fla. 1999)). In a case of clear-cut copying such as that by the Defendants herein, it is appropriate to infer Defendants intended to benefit from Gucci's reputation, to Gucci's detriment. See Playboy Ent., Inc. v. P.K. Sorren Export Co. Inc. of Fla., 546 F. Supp. 987, 996 (S.D. Fla. 1982).

## **(7) Evidence of Actual Confusion.**

Actual confusion is unnecessary to establish infringement since the test is likelihood of confusion. See Frehling Enters. v. Int'l Select Group, Inc., 192 F.3d 1330, 1340 (11th Cir. 1999). In this case, however, it is reasonable to infer actual confusion exists in the marketplace based upon the circumstantial evidence available. Defendants are advertising, offering to sell and selling counterfeit goods identical in appearance to those sold by Gucci. (Kipen Decl. ¶¶ 4-5, 9-13; Burns Decl. ¶ 4 and Comp. Ex. 1 thereto.) Even if buyers are told of the bogus nature of Defendants' Goods, other consumers viewing Defendants' Goods in a post-sale setting will obviously be confused, because they are viewing goods bearing the Gucci Marks, which undeniably creates the impression they are viewing genuine goods sold or authorized by Gucci. Such post-sale confusion is entirely actionable. See Remcraft Lighting Products, Inc. v. Maxim Lighting, Inc., 706 F. Supp. 855, 859 (S.D. Fla. 1989) ("The likelihood of confusion need not occur at wholesale level when the end user will be confused.").

The seven factors weigh only in Gucci's favor. Gucci has thus shown a probability of success on the merits of its trademark counterfeiting and infringement claim.

### **b) Likelihood of Success on Cybersquatting Claim.**

The Anticybersquatting Consumer Protection Act ("ACPA") protects the owner of a distinctive or famous trademark from another's bad faith intent to profit from the trademark owner's mark by registering or using a domain name which is identical or confusingly similar to, or dilutive of, the trademark owner's mark without regard to the goods or services of the parties. 15 U.S.C. § 1125(d). To prevail under 15 U.S.C. § 1125(d), Gucci must prove that (1) the Gucci Marks are distinctive or famous and entitled to protection; (2) Defendants' domain names are identical or confusingly similar to the Gucci Marks; and (3) Defendants registered or used the domain names with a bad faith intent to profit. Bavaro Palace, S.A. v. Vacation Tours, Inc., 203 Fed. Appx. 252, 256, 2006 WL 2847233, at \*3 (11th Cir. 2006). The evidence submitted herewith satisfies the requirements of 15 U.S.C. § 1125(d).

Defendant Number 1 has registered its respective e-commerce store name, which incorporates, at least, one of the Gucci Marks in its entirety surrounded by descriptive or generic terms, rendering the name nearly identical as compared to the Gucci Marks (the "Cybersquatted E-commerce Store Name.")<sup>5</sup> See Victoria's Cyber Secret Ltd. P'ship v. V Secret Catalogue, Inc.,

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<sup>5</sup> See Compl. ¶¶ 33, 67 [DE 1].

161 F. Supp. 2d 1339, 1351 (S.D. Fla. 2001) (“The taking of an identical copy of another’s famous and distinctive trademark for use as a domain name creates a presumption of confusion among Internet users as a matter of law.”). Moreover, Courts have found that even slight differences between a domain name and a registered mark, such as the addition of minor or generic words to the disputed domain name, is irrelevant. See Ford Motor Co. v. Greatdomains.com, Inc., 177 F. Supp. 2d 635, 642 (E.D. Mich. 2001) (holding “unless words or letters added to the plaintiff’s mark within the domain name clearly distinguish it from the plaintiff’s usage, allegations that a domain name incorporates a protected mark generally will suffice.”).

The ACPA lists nine nonexclusive factors for courts to consider in determining whether a domain name has been registered or used in “bad faith” with an intent to profit from a mark in registering or using the mark in a domain name. See 15 U.S.C. § 1125(d)(1)(B)(i); see also Victoria’s Cyber Secret Ltd. P’ship, 161 F. Supp. 2d at 1346. The nine factors are not meant to be exclusive and the Court may consider all relevant factors in making a determination of bad faith. Id. at 1347. Ultimately, each factor addresses whether “the defendant’s use of the disputed domain name is legitimate – i.e., for some purpose other than simply to profit from the value of the trademark.” Ford Motor Co., 177 F. Supp. 2d at 642. An examination of the bad faith factors compels the conclusion that Defendant Number 1’s registration and use of the Cybersquatted E-commerce Store Name violates 15 U.S.C. § 1125(d).

The first and third factors, § 1125(d)(1)(B)(I) and (III), are clearly present inasmuch as Defendant Number 1 has no rights in the Gucci Marks and that Defendant has never used those Marks in connection with a bona fide offering of goods or services. Additionally, the fourth, fifth, and ninth factors, § 1125(d)(1)(B)(IV), (V), (IX), weigh in Gucci’s favor. As discussed above, Defendant Number 1 has clearly intentionally incorporated the Gucci Marks in its Cybersquatted E-commerce Store Name to divert consumers looking for Gucci’s Internet website to its own Internet e-commerce store for commercial gain. Such consumers are likely to be confused as to the source and sponsorship of Defendant Number 1’s Internet e-commerce store and mistakenly believe its website store is endorsed by and/or affiliated with Gucci. This is especially true in light of the fact that the e-commerce store is offering for sale counterfeit Gucci branded goods. Clearly, Defendant Number 1’s registration of its Cybersquatted E-commerce Store Name to sell and offer for sale counterfeit and infringing Gucci branded goods, knowing

the name is identical or confusingly similar to Gucci's indisputably famous and distinctive marks, ensures a likelihood of confusion among consumers. See House Judiciary Committee Report on H.R. 3028, H.R. Rep. No. 106-412 p. 13 (October 25, 1999) ("The more distinctive or famous a mark has become, the more likely the owner of that mark is deserving of the relief available under this act."). Thus, Gucci has shown a likelihood of success on the merits of its cybersquatting claim.

**c) Likelihood of Success on False Designation of Origin, Common Law Unfair Competition, and Common Law Trademark Infringement Claims.**

As with a trademark infringement claim, the test for liability for false designation of origin under Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), is also whether the public is likely to be deceived or confused by the similarity of the marks at issue. Two Pesos, 505 U.S. at 763. Additionally, whether a defendant's use of a plaintiff's trademarks creates a likelihood of confusion between the plaintiff's and the defendant's products is also the determining factor in the analysis of unfair competition under the common law of Florida and Florida common law trademark infringement. See Planetary Motion, Inc. v. Techsplosion, Inc., 261 F.3d 1188, 1193 n.4 (11th Cir. 2001) ("Courts may use an analysis of federal infringement claims as a 'measuring stick' in evaluating the merits of state law claims."); PetMed Express, Inc. v. MedPets.com, Inc., 336 F. Supp. 2d 1213, 1217-18 (S.D. Fla. 2004). Whether the violation is called infringement, unfair competition, or false designation of origin, the test is identical – is there a "likelihood of confusion?" Two Pesos, 505 U.S. at 763. Thus, because Gucci has established the merits of its trademark counterfeiting and infringement claims, a likelihood of success is also shown as to Gucci's claim for false designation of origin, as well as its common law unfair competition and trademark infringement claims.

**2. Gucci is Suffering Irreparable Injury.**

As the Eleventh Circuit expressed it: "[A] sufficiently strong showing of likelihood of confusion [caused by trademark infringement] may by itself constitute a showing of ... [a] substantial threat of irreparable harm." Ferrellgas Ptnrs., L.P. v. Barrow, 143 Fed. Appx., 180, 191 (11th Cir. 2005) (citing McDonald's Corp. v. Robertson, 147 F.3d 1301, 1310 (11th Cir. 1998)). Such a finding of irreparable injury following a showing of likelihood of confusion is virtually always made in a case such as this, where a plaintiff has demonstrated it will lose control of its reputation as a result of a defendant's activities. Id. A likelihood of confusion exists

herein because Defendants have engaged in counterfeiting activities using spurious designations indistinguishable from the Gucci Marks.

**3. The Balance of Hardship Tips Sharply in Gucci's Favor.**

Gucci has expended resources to develop the quality, reputation, and goodwill associated with the Gucci Marks. (Kipen Decl. ¶¶ 6-8.) Should Defendants be permitted to continue its trade in counterfeit goods, Gucci will suffer losses and damage to its reputation. (See *id.* at ¶¶ 8, 24.) However, Defendants will suffer no legitimate hardship in the event a temporary restraining order is issued, because Defendants have no right to engage in their present counterfeiting and infringing activities.

**4. The Relief Sought Serves the Public Interest.**

Defendants are engaged in unlawful activities and are directly defrauding consumers by palming off Defendants' Goods as Gucci's genuine goods. The public has an interest in not being misled as to the origin, source, or sponsorship of trademarked products. See Nailtiques Cosmetic Corp. v. Salon Sciences, Corp., 1997 WL 244746, 5, 41 U.S.P.Q.2d 1995, 1999 (S.D. Fla. 1997) ("The interests of the public in not being victimized and misled are important considerations in determining the propriety of granting injunctive relief.").

**C. The Equitable Relief Sought is Appropriate.**

The Lanham Act authorizes courts to issue injunctive relief "according to principles of equity and upon such terms as the court may deem reasonable, to prevent the violation of any right of the registrant of a mark ...." 15 U.S.C. § 1116(a).

**1. Entry of an Order Immediately Enjoining Defendants' Unauthorized and Unlawful Use of Gucci's Trademarks is Appropriate.**

Gucci requests an order requiring Defendants to immediately cease all use of the Gucci Marks, or substantially similar marks, including on or in connection with all e-commerce stores they own and operate, or control. Such relief is necessary to stop the ongoing harm to Gucci's trademarks and goodwill and to prevent Defendants from continuing to benefit from the increased consumer traffic to their unlawful operations created by their unlawful use of the Gucci Marks. Many courts, including this Court, have authorized immediate injunctive relief in similar cases involving the unauthorized use of trademarks.<sup>6</sup>

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<sup>6</sup> See Apple Corps Ltd. v. Individuals, P'ships & Unincorporated Ass'ns Identified on Schedule "A", No. 21-60377-CIV-SMITH, 2021 U.S. Dist. LEXIS 115770 (S.D. Fla. March 1, 2021)

## 2. An *Ex Parte* Order Restraining Transfer of Assets is Appropriate.

In addition to an order temporarily restraining Defendants' practices, the Court should further enter an order limiting the transfer of Defendants' unlawfully gained assets. Gucci has demonstrated above that it will likely succeed on the merits of its claims. As such, under 15 U.S.C. § 1117, Gucci will be entitled to an accounting and payment of the profits earned by Defendants throughout the course of their counterfeiting scheme. 15 U.S.C. § 1117(a) (2022). Due to the deceptive nature of the counterfeiting business and Defendants' deliberate violations of federal trademark laws, Gucci respectfully requests this Court grant additional *ex parte* relief identifying payment accounts and restraining the transfer of all monies held or received by PayPal and Stripe, or other financial institutions, for the benefit of any one or more of the Defendants. (See Wiborg-Rodriguez Decl. ¶ 5.) See Int'l Star Class Yacht Racing Ass'n v. Tommy Hilfiger USA, Inc., 80 F.3d 749 (2d Cir. 1996); see also SEC v. ETS Payphones, 408 F.3d 727, 735 (11th Cir. 2005) (finding it proper to all of the defendant's assets, because it was necessary to preserve sufficient funds for the potential disgorgement in the case).

This Court has broad authority to grant such an order. The Supreme Court has provided that district courts have the power to grant preliminary injunctions to prevent a defendant from transferring assets in cases where an equitable interest is claimed. Grupo Mexicano de Desarrollo, S.A. v. Alliance Bond Fund, Inc., 527 U.S. 308, 144 L. Ed. 2d 319, 119 S. Ct. 1961 (1999). Moreover, almost every Circuit has interpreted Rule 65 of the Federal Rules of Civil Procedure to grant authority to courts to restrain assets *pendente lite*. See Mason Tenders Dist. Council Pension Fund v. Messera, 1997 WL 223077 (S.D.N.Y. May 7, 1997) (acknowledging

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(Order Granting *Ex Parte* Application for Entry of Temporary Restraining Order); Whirlpool Corp. v. Individual, No. 20-60626-CIV-SMITH, 2020 U.S. Dist. LEXIS 142234 (S.D. Fla. April 28, 2020, docketed April 29, 2020) (same); Taylor Made Golf Co. v. Individuals, P'ships & Unincorporated Ass'ns Identified on Schedule "A", No. 20-60468-CIV-SMITH, 2020 U.S. Dist. LEXIS 110012 (S.D. Fla. April 9, 2020, docketed April 13, 2020) (same); Chanel, Inc. v. Individuals, P'ships & Unincorporated Ass'ns Identified on Schedule "A", No. 20-60519-CIV-SMITH, 2020 U.S. Dist. LEXIS 108879 (S.D. Fla. April 9, 2020) (same). See also Tiffany NJ LLC v. Bus. Entities, No. 22-61297-CIV-DIMITROULEAS, 2022 U.S. Dist. LEXIS 186058 (S.D. Fla. July 18, 2022) (same); Richemont Int'l SA v. Individuals, Bus. Entities, & Unincorporated Assocs. Identified on Schedule A, No. 22-cv-61064-BLOOM, 2022 U.S. Dist. LEXIS 104707 (S.D. Fla. June 8, 2022, docketed June 10, 2022) (same); Chanel, Inc. v. Individuals, P'ships & Unincorporated Ass'ns, Case No. 20-61646-CIV-ALTMAN, 2020 U.S. Dist. LEXIS 248740 (S.D. Fla. Sept. 9, 2020, docketed Sept. 11, 2020) (same).



that “[a]lmost all the Circuit Courts have held that Rule 65 is available to freeze assets *pendente lite* under some set of circumstances”).

In light of the illicit nature of the counterfeiting business and the ability of counterfeiters to practically eliminate their evidentiary trails by conducting their business entirely over the Internet, courts in the Eleventh Circuit, among others, have particularly noted the significance of such asset restraints in cases involving counterfeiting defendants. See, e.g. Levi Strauss & Co. v. Sunrise Int’l Trading, 51 F.3d 982 (11th Cir. 1995); Reebok Int’l Ltd. v. Marnatech Enter., 737 F. Supp. 1521 (S.D. Cal. 1989), aff’d, 970 F.2d 552 (9th Cir. 1992). In Levi Strauss, the Eleventh Circuit upheld an order granting an asset restraint against an alleged counterfeiter where the complaint included a request for a permanent injunction and the equitable remedy of disgorgement of the alleged counterfeiter’s profits under 15 U.S.C. § 1117. Levi Strauss, 51 F.3d at 987. Distinguishing Levi Strauss from two earlier cases not involving Lanham Act claims, the Court emphasized the necessity of the restraint holding that a “request for equitable relief invokes the district court’s inherent equitable powers to order preliminary relief, including an asset freeze, in order to assure the availability of permanent relief.” Id. citing Federal Trade Commission v. United States Oil and Gas Corp., 748 F.2d 1431, 1433-34 (11th Cir. 1984) (district court may exercise its full range of equitable powers, including a preliminary asset restraint, to ensure that permanent equitable relief will be possible). Indeed, courts may issue broad asset restraints to preserve the availability of permanent relief, including assets that are not directly traceable to the fraudulent activity that serves as a basis for the equitable relief requested. See S. E. C. v. Lauer, 445 F. Supp. 2d 1362, 1370 (S.D. Fla. 2006) (noting that there is no requirement for the restrained assets be traceable to the fraudulent activity underlying a lawsuit); Levi Strauss & Co., 51 F.3d at 987-88 (upholding asset restraint, including assets not linked to the profits of the alleged illegal activity, noting the defendants may request the court exempt any particular assets); Kemp v. Peterson, 940 F.2d 110, 113-14 (4th Cir. 1991) (district court may restrain assets not specifically traced to illegal activity). In substantially similar cases, this Court and others have entered the precise relief sought herein.<sup>7</sup>

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<sup>7</sup> See e.g., Apple Corps Ltd. v. Individuals, P’ships & Unincorporated Ass’ns Identified on Schedule “A”, No. 21-60377-CIV-SMITH, 2021 U.S. Dist. LEXIS 115770 (S.D. Fla. March 1, 2021) (Order granting TRO, *inter alia*, restraining funds held or received by financial institution to preserve assets to satisfy Plaintiff’s requested relief); Whirlpool Corp. v. Individual, No. 20-60626-CIV-SMITH, 2020 U.S. Dist. LEXIS 142234 (S.D. Fla. April 28, 2020, docketed April

Similarly, in Reebok v. Marnatech, the District Court granted Reebok a limited restraint of the defendants' assets for the purpose of preserving those assets, thus ensuring the availability of a meaningful accounting after trial. Reebok Int'l Ltd., 737 F. Supp. at 1526. In affirming the decision, the Ninth Circuit determined that the plaintiff met its burden of demonstrating: (1) a likelihood of success on the merits; (2) immediate and irreparable harm because of defendants' counterfeiting activities; and (3) that defendants might hide their allegedly ill-gotten profits if their assets were not frozen. Reebok Int'l Ltd., 970 F.2d 552, 563 (9th Cir. 1992). Moreover, the Court reasoned: "because the Lanham Act authorizes the District Court to grant Reebok an accounting of [defendant's] profits as a form of final equitable relief, the District Court has the inherent power to freeze [defendant's] assets in order to ensure the availability of that final relief." Reebok Int'l Ltd., 970 F.2d. at 559; see also Republic of Philippines v. Marcos, 862 F.2d 1355, 1364 (9th Cir. 1988), cert. denied, 490 U.S. 1035 (1989) ("[a] court has the power to issue a preliminary injunction in order to prevent a defendant from dissipating assets in order to preserve the possibility of equitable remedies").

Using the power to issue provisional remedies ancillary to their authority to provide final equitable relief, numerous courts have granted orders restraining defendants from transferring their assets under trademark infringement claims. See e.g., Levi Strauss, 51 F.3d at 987; Reebok Int'l Ltd., 970 F.2d at 559. Moreover, to provide complete equitable relief, courts have granted such orders without providing notice to the defendants. Specifically, federal courts have held that where advance notice of an asset restraint is likely to cause a party to alienate the assets sought to be restrained, a temporary restraining order may be issued *ex parte*. See F.T. Int'l Ltd v. Mason, 2000 WL 1514881 \*3 (E.D. Pa. 2000) (granting *ex parte* TRO restraining defendants' bank accounts upon finding that advance notice would likely have caused the defendants to secret or

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29, 2020) (same); Taylor Made Golf Co. v. Individuals, P'ships & Unincorporated Ass'ns Identified on Schedule "A", No. 20-60468-CIV-SMITH, 2020 U.S. Dist. LEXIS 110012 (S.D. Fla. April 9, 2020, docketed April 13, 2020) (same); Chanel, Inc. v. Individuals, P'ships & Unincorporated Ass'ns Identified on Schedule "A", No. 20-60519-CIV-SMITH, 2020 U.S. Dist. LEXIS 108879 (S.D. Fla. April 9, 2020) (same). See also Tiffany NJ LLC v. Bus. Entities, No. 22-61297-CIV-DIMITROULEAS, 2022 U.S. Dist. LEXIS 186058 (S.D. Fla. July 18, 2022) (same); Richemont Int'l SA v. Individuals, Bus. Entities, & Unincorporated Assocs. Identified on Schedule A, No. 22-cv-61064-BLOOM, 2022 U.S. Dist. LEXIS 104707 (S.D. Fla. June 8, 2022, docketed June 10, 2022) (same); Chanel, Inc. v. Individuals, P'ships & Unincorporated Ass'ns, Case No. 20-61646-CIV-ALTMAN, 2020 U.S. Dist. LEXIS 248740 (S.D. Fla. Sept. 9, 2020, docketed Sept. 11, 2020) (same).

alienate funds); CSC Holdings, Inc. v. Greenleaf Elec., Inc., 2000 WL 715601 (N.D. Ill. 2000) (granting *ex parte* TRO enjoining cable television pirates and restraining pirates' assets).

Defendants' blatant violations of federal trademark laws warrant an *ex parte* order restraining the transfer of their assets. Moreover, as Defendants' businesses are conducted anonymously over the Internet, Gucci has additional cause for *ex parte* relief, as Defendants may easily secret or transfer their assets without the Court's or Gucci's knowledge.

**D. An Appropriate Bond Should Secure the Injunction.**

The posting of security upon issuance of a temporary or preliminary injunction is vested in the Court's sound discretion. Fed. R. Civ. P. 65(c). Because of the strong and unequivocal nature of Gucci's counterfeiting evidence, Gucci respectfully requests this Court require it to post a bond of no more than ten thousand dollars (\$10,000.00), subject to increase at the Court's discretion should an application be made in the interest of justice.

**IV. CONCLUSION**

In view of the foregoing, Plaintiff respectfully requests this Court grant its *Ex Parte* Application and enter a temporary restraining order as to Defendants in the form submitted herewith and schedule a hearing on Plaintiff's Motion for a Preliminary Injunction before the expiration of the temporary restraining order. Additionally, due to the time provisions of a temporary restraining order, in the event the application is granted, Gucci respectfully requests the Court provide a copy of the temporary restraining order to Plaintiff's counsel via e-mail at [raquel@smgpa.cloud](mailto:raquel@smgpa.cloud) so that Gucci may immediately effectuate any relief ordered therein and provide Defendants proper notice of the order and any subsequent hearing date.

DATED: May 31, 2023.

Respectfully submitted,  
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Attorneys for Plaintiff

**SCHEDULE “A”**  
**DEFENDANTS BY E-COMMERCE STORE NAME, FINANCIAL ACCOUNTS,**  
**AND E-MAIL ADDRESSES**

Def. No.	Defendant by E-commerce Store Name	Payee Information	Merchant ID	Financial Account Information	Contact E-mail Address
1	guccieyewear-fr.com	x487794@163.com	SSFT89P37R85Y		admin@kobaltstore.com schlettehollis@gmail.com
		nn278556@163.com	Y5TGNHHQC4FF Y		
		w285137@163.com	CSJ3AGXKBQE2Q		
		Ginger & Spice Baking Creations	PK7PBPVFYP9XQ	tpretecosgrunh@gmail.com	
		gaming	P82CNGWNUG62 U		
2	alishirts.com a/k/a alishirts.shop	HOANG BA DUONG	ZTGWBQVYP3JG G	baduongfenwick97@hotmail.com	sales@alishirts.shop
3	borseluxe.com	borseluxe	WBSGY568SCX5S	burak_klc@rocketmail.com	
4	brandoff-store.com	株式会社ジグザグ	B2LQMW82VELM U	paypaljp@zig-zag.co.jp	noreply@worldshopping.global
5	braytime.com	Upton-Zemlak Technology Co., Ltd	VJ8QJPUWU7NDJ		541771209@qq.com
5	connder.com	Upton-Zemlak Technology Co., Ltd	VJ8QJPUWU7NDJ	info@xtdtp.com	support@outlets.services
		Kshlerin-Schumm Technology Co., Ltd	FY755F9JQZD8J		
		Kgeki GL Group Co., Ltd	GYW844585FH9S		
		Conner-Schmeler Technology Co., Ltd	N5EVZ7MR2ZECU		
		Conner-Schmeler Technology Co., Ltd	N5EVZ7MR2ZECU	cs@xlqua.com	
5	garexvvr.com	Kgeki GL Group Co., Ltd	GYW844585FH9S		support@outlets.services moorains@hotmail.com
		Kshlerin-Schumm Technology Co., Ltd	FY755F9JQZD8J		
		YNT E-commerce Co. LTD	ZZ9NYFS932GZE		

5	slivvie.com	Kshlerin-Schumm Technology Co., Ltd	FY755F9JQZD8J	info@omefj.com	sectrl1@hotmail.com support@outlets.services
		Conner-Schmeler Technology Co., Ltd	N5EVZ7MR2ZECU		
6	chandeco.com	Mark Asbury Variety Store	5DVJ6CHUA7CSJ		hello@chandeco.com
		Didier Thomas Special Store	GJ9B6A5ZN9CT4	DidierThomas4123@hotmail.com	hello@foreswatch.com hello@chanccoco.com hello@chandeco.com
7	COCOSneakers.to			suninglei@outlook.com	mozmind@gmail.com adsmccinc@gmail.com
7	mineme_canico	Mees Johannes Toonen	H4TFACWFUF9PS	suninglei@outlook.com	
8	dengyun778 a/k/a Luxury1688 a/k/a Luxury1234	雅云 邓		1607119283@qq.com	
9	discreetcouture.com	<i>Stripe payment</i>	MEIMEI MEDIA		discreetcouture@gmail.com
10	dreamluxuryshop.com	厦门亘越进出口有限公司	YNG2Q3VDZ7CRL	spring66@vip.163.com	xmhighend@gmail.com
		厦门市思明区器闻堂茶具店	U8ERHYP7PDNEW		
11	evelyngifts.com	good trade	KFVMHZ9TMRC86	halloimkai@hotmail.com	service@lenejewelry.com EvelynGifts@hotmail.com
		Jiazhidao Jewelry International Trade Co., Ltd.	GJFJ9JKX2MD4J		
12	evoss.shop	Trung Đoàn	MNG67AQQTBP3G	dttrung256@outlook.com	baooanh6689@gmail.com support@Farace.com
13	factorylux.shop	<i>Credit Card</i>			info@factorylux.shop
14	fashionprint.top	Fashionsuitset	QVGFYZ4LRJEC6	ai17897544054@hotmail.com	ai17733470717@163.com
15	fdeew.shop	伟明 高	6VBQM5U6ZEGW8	729142914@qq.com	lyyetmbwbv@hotmail.com
15	rotuer.online	伟明 高	6VBQM5U6ZEGW8	729142914@qq.com	lyyetmbwbv@hotmail.com
16	foumin.shop	PEMBERTON-BILLING MARY	J7JU2SJXDRCC6	MARYPEMBERTON1227@outlook.com	service@billuxury.com HAMIDABANO1227@outlook.com
17	gocacoka.com	福州市晋安区薇诺尔达网络科技有限公司	UV2KBX2VXX7KE	weinuoerda@outlook.com	welokf001@gmail.com garetaltonio@gmail.com
17	yespersn.com	RUI TU TRADING CO., LIMITED	UP7QD9FEZKNUW	ruitu@zhuyouyun.com	garetaltonio@gmail.com
		福州市晋安区薇诺尔达网络科技有限公司	UV2KBX2VXX7KE		

18	hightopcustom.com	Nguyen Bao Ngoc	CJWGJMBFNYMH E	brendonjenny3251@gmail.com	hightopcustom@hotmail.com
19	insunglass.com	Lee Clark Variety Store	JFGZRUTKRSYU U	LeeClark4541@hotmail.com	hello@insunglass.com
		Clément Olivier Category Store	LXMCRYR743H4 U		
		Nitya Rabouille Category Store	ARG48G8FN6Q3N		
		Ludivine Noiraud Special Store	8UYBVWGETJRJJ		
		Jose Guimaraes Special Store	TZV5GA7AT6AYS		
		Christian Barno Special Store	ENX5FT3MC8XA U		
		Kerry James Category Store	LZFUJ3NVYZDYS		
20	jacquemusuk.shop	WOODLAND WALLIS	6DKK3ZCE8MDP Q	WALLISWOODLAND@gmail.com	WEWHFDKK@outlook.com hello@allwatch.store vinterety@gmail.com MARIEWALKER12272@outlook.com
20	senmonten.shop	ELAM FRANCES	6DKK3ZCE8MDP Q	FRANCESELAM1228@gmail.com	annedwards1227@outlook.com
21	jacquemusus.shop	FORDHAM LOUISE	A8P4M883QXL36	LOUISEFORDHAM1224@gmail.com	RGDNVVFDDGJK@outlook.com rfhfghdg@outlook.com hello@allwatch.store
22	kananasu.com	Yuekong Technology Co., Ltd.	9A37UUB56Y34	13266664188@163.com	kanasumi.com@hotmail.com
23	kelvingift.com	Kelvin Store	6WXPMA5A7A3 W	akiakivania3@gmail.com	support@kelvingift.com support@enstyleens.com
24	kickside.com.br	小凤 谢		xiao5feng6x@163.com	edrsales@kickztalk.com yolanda.designergu@gmail.com service@kickztalk.com sales@kickztalk.com lency@designergu.ru
25	kingofbag.com	KingOfBag	H583ENS9NW7BA		kingofbaghelp@gmail.com
25	strangetrend.shop	NGUYEN THI GIANG	H583ENS9NW7BA	nguyenthigiang94at@gmail.com	contactstrangetrend@gmail.com
			4XYHFTSJWURZL		
26	kingshooz.com	Luong Ngoc Toan	JM49ZLBCLB94G	xuandinh32346@gmail.com	kingshooz.help@gmail.com
27	luckyluxshop.com	绪鹏 周		1561763932@qq.com	noreply@luckyluxshop.com
27	topluxshoes.cn	株式会社Mr.circulate		1561763932@qq.com	Service@topluxshoes.cn
27	topluxshoes.com	株式会社Mr.circulate		1561763932@qq.com	service@topluxshoes.com
27	topluxshop.com	株式会社Mr.circulate		1561763932@qq.com	info@topluxshop.com
28	luxuriousgoods.shop	TAYLOR BRADLEY	36HFQ4XXERMZ Y	BRADLEYTAYLOR0110@gmail.com	annedwards1227@outlook.com

28	rorekkusup.shop	TAYLOR BRADLEY	CKR9Q3A2W5XN L	BRADLEYTAYLOR0110@g mail.com	HAMIDABANO1227@outlook. com service@billuxury.com
29	luxury goods a/k/a ygshoes188.com	俊恒 朱		16582949310@163.com	
30	luxury-bags-shoes a/k/a Beatrice	刚 郑		2361373382@qq.com	
31	luxurydiscount1.com	四川省康宠宠 物用品有限责 任公司	MKCALGY7Y3DH J	frankhuang0918@gmail.com	devonflood87@gmail.com
32	lvgucci188.com a/k/a weinifuwul4	安平 刘		17108611455@163.com	
33	mousuni.shop	WALKER MARIE	FSYVSJD45JU2G	MARIEWALKER12272@gm ail.com	MARIEWALKER12272@outlo ok.com HAMIDABANO1227@outlook. com
		WATHEN FREDERICK	NK9EAQ5BJ3MV Y		
		DIMOND JANE	6EAGHH28QQBPJ	JANEDIMOND10@gmail.co m	
34	ohhhcasetie.com	广州雄德跨境 电子商务有限 公司	AGL2SD86J4ZY4	gzxiongde123@163.com	info@casetie.com
35	perfectkickznews.ru	秀美 陈		chenxiumei58@163.com	missy@fadsway.com sales@dopekickz.ru pkz@fadsway.com
36	repgod.ru		SVPD6EESMQHL8	nugakopjvhuy@gmail.com	repgod.official@gmail.com werep.teamsp@gmail.com
37	sgvipsbags.com a/k/a bags.ygshoes188	玉买尔 佐合热阿依·		zy16525913062@hotmail.com	
38	shop.xieehop.ga	William Webster @WilliamWebs ter173		cddjkovmgaegbb@hotmail.co m	services@vkvtomall.top d@scvmtg.com
39	sneakerhomie.su		GZPBGC9V9RJ93C	trangvubhbm5311xt@outlook. com	sneakerhomiez@gmail.com sneakerhomie.global@gmail.co m account @design.sneaker sneakerhomie.official@gmail.co m
40	tyclocet.com	Stripe payment	DESIGNFULLPRI NT		support@tyclocet.com bydcorporation@gmail.com
41	usbestyle.com	CAO TRUNG TIEN	SRT672S9W24Q8	caotrungtien0201@gmail.com	support@usbestyle.com
42	vvs.lyc a/k/a ZY shoes	Bing Bing Zhang		zhangbingbing0201@hotmail. com	
43	wemadecases.com	Online Shop	9ML8GK96XWD34	yassinebenhichame@gmail.co m	contact@wemadecases.com
44	womenbags.nl	Trang Nguyen		alimordesinger@gmail.com	womenbags7@gmail.com admin@womenbags.nl
45	xirance.top	广州以显贸易 有限公司	LHETWTHCS654G	xinqidian1126@outlook.com	xinqidian1126@outlook.com

46	yyaaho.com	PARSLOW VIOLET	FGBVDKV2HW5J N	VIOLETPARSLOW@outlook .com	RGDNVVFDGJK@outlook.co m rfhfghdg@outlook.com hello@allwatch.store
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