

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 25-21058-CIV-ALTMAN**

OMEGA SA,

Plaintiff,

vs.

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

Defendants.

**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, Omega SA (“Omega “ 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 the Court’s inherent authority. In support thereof, Omega submits the following memorandum of law.

I. INTRODUCTION

Defendants are knowingly and intentionally promoting, advertising, distributing, offering for sale, and/or selling goods bearing and/or using counterfeits of one or more of Omega’s registered trademarks within this district and throughout the United States by operating Internet based e-commerce stores under their seller names identified on Schedule “A” hereto (“E-commerce Store Names”). Omega obtained evidence clearly demonstrating that Defendants (a) are engaged in the advertising, offering for sale, and sale of counterfeit versions of Omega’s

branded goods; and (b) accomplish their sales of counterfeit goods via the Internet using, at least, the E-commerce Store Names. Omega's Complaint thus alleges claims for trademark counterfeiting and infringement, false designation of origin, common law unfair competition, and common law trademark infringement.

Defendants' unlawful activities deprive Omega 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 Omega's reputation and goodwill and the commercial value of Omega's trademarks and Defendants are defrauding Omega and consumers for their own benefit. Defendants should not be permitted to continue their unlawful activities, which are causing Omega ongoing irreparable harm. Accordingly, Omega is seeking entry of a temporary restraining order prohibiting Defendants' further wrongful use of Omega's trademarks.

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

II. STATEMENT OF FACTS

A. Plaintiff's Rights.

Omega is the owner the federally registered trademarks listed in Paragraph 4 (the "Omega Marks") of the Declaration of Antoine Haller in Support of Plaintiff's Application for TRO

(“Haller Decl.”) [ECF No. 6-1]; see also United States Trademark Registrations for the Omega Marks attached as Comp. Ex. 1 to the Compl. [ECF No. 1-2].) The Omega Marks are used in connection with the manufacture and distribution of among other things, watches and related products. (See id.) The Omega Marks are symbols of Omega’s quality, reputation, and goodwill and have never been abandoned. (See id. ¶¶ 11–12.) Moreover, Omega expends substantial resources developing, advertising, and otherwise promoting its trademarks. (See id. ¶ 8.)

Furthermore, Omega extensively uses, advertises, and promotes the Omega Marks in the United States in interstate commerce, and carefully monitors and polices the use of its trademarks. (See id. ¶¶ 11–12.) As a result, the Omega Marks have acquired fame in the consumer market. (Id. ¶ 9.) The Omega Marks are widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning; as such, the Omega Marks have come to symbolize the enormous goodwill of Omega’s genuine products throughout the United States. (Id. ¶¶ 10–11.) At all times relevant hereto, Defendants have been aware of Omega’s (a) ownership of the Omega Marks; (b) exclusive rights to use such Marks; and (c) substantial goodwill embodied in, and favorable recognition for, the Omega Marks.

B. Defendants Wrongfully Use Plaintiff’s Trademarks.

Defendants do not have, nor have they ever had, the right or authority to use the Omega Marks for any purpose. (See Haller Decl. ¶¶ 14, 17.) Despite their known lack of authority to do so, Defendants are concurrently promoting and otherwise advertising, distributing, selling and/or offering for sale through their respective E-commerce Store Names, goods using counterfeit marks that are exact copies of one or more of the Omega Marks, without authorization (“Defendants’ Goods”). (Haller Decl. ¶¶ 14–18; Declaration of Virgilio Gigante in Support of Application for TRO (“Gigante Decl.”) [ECF No. 6-2] ¶¶ 2; Declaration of Kathleen Burns in Support of Application for TRO (“Burns Decl.”) [ECF No. 6-3] ¶ 4, see also web page captures from Defendants’ E-

commerce Store Names displaying Omega's branded goods offered for sale attached as Comp. Ex. "1" to the Burns Decl. [ECF No. 6-4 through 6-7].)

Given Defendants' slavish copying of the Omega Marks, Defendants' Goods offered for sale and sold under identical marks are indistinguishable to consumers, both at the point of sale and post-sale. By using the Omega Marks, Defendants have created a false association between their counterfeit goods and e-commerce stores and Omega in violation of 15 U.S.C. § 1125(a) and is causing and will continue to cause Omega irreparable injury and damage. (Haller Decl. ¶ 29.)

Omega's counsel retained Invisible Inc ("Invisible"), a licensed private investigation firm, to investigate the promotion and sale of counterfeit Omega branded products by Defendants and to document the available payment account data for receipt of funds paid to Defendants for the sale of counterfeit Omega branded merchandise. (Gigante Decl. ¶ 2; Burns Decl. ¶ 3.) Invisible accessed the e-commerce stores operating under Defendants' E-commerce Store Names, placed an order from each e-commerce store for the purchase of a product bearing counterfeits of at least one of the Omega Marks, and requested a product from each Defendant be shipped to addresses in the Southern District of Florida. (Burns Decl. ¶ 4.) Each order was processed entirely online and following the submission of the orders, Invisible received information for finalizing payment¹ for the products ordered from Defendants to their respective payment accounts, as identified on Schedule "A" hereto.² (Burns Decl. ¶ 4.) The detailed web page captures and images of the products Invisible ordered via each Defendants' E-commerce Store Names were sent to Omega's representative for review. (Burns Decl. ¶ 4; Gigante Decl. ¶ 2; Haller Decl. ¶ 16.) Omega's

¹ Invisible did not transmit the funds to finalize the sale for the orders from many of the Defendants so as to avoid funding Defendants' coffers. (See Burns Decl. ¶ 4, n.1.)

² The means of electronic contact provided by Defendants in connection with their respective E-commerce Store Names, including e-mail addresses and WhatsApp phone numbers, are also included on Schedule "A." (Gigante Decl. ¶ 3, n.1; Burns Decl. ¶ 4, n.2.)

representative, who is trained in identifying the distinctions between genuine Omega merchandise and counterfeit copies of the same, reviewed and visually inspected the goods bearing the Omega Marks Invisible ordered via each of the E-commerce Store Names by reviewing the e-commerce stores operating under the E-commerce Store Names, or the detailed web page captures of the goods bearing the Omega Marks, and determined the goods were non-genuine, unauthorized versions of Omega's branded goods. (Haller ¶¶ 16–18.)

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, 2 (S.D. Fla. 1983). Comparing the Omega Marks to the marks used by Defendants in connection with their Goods reveals the obvious counterfeit nature of such Goods. Defendants' Goods are being promoted, advertised, offered for sale, and sold by Defendants 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 infringe on Omega's rights. The E-commerce Store Names and associated payment accounts are a substantial part of how Defendants further their scheme and cause Omega harm.

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

Defendants are all using counterfeits of Omega's famous name and the Omega Marks to make their e-commerce stores appear more relevant and attractive to consumers shopping for Omega's genuine branded products online. While each Defendant causes direct individual harm to Omega, the combined effect of Defendants' unlawful activities functions as a force multiplier to cause Omega a single indivisible harm. (Haller Decl. ¶¶ 22, 26.) 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 Omega branded goods are widely legitimately advertised, promoted, offered for sale, and discussed by Omega and unrelated third parties via the Internet. (Haller Decl. ¶ 19.) Visibility on the Internet, particularly via search engines and social media platforms, is important to Omega's overall marketing and consumer education efforts. (Id. ¶ 20.) Omega 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 Omega to fairly educate consumers about the value associated with Omega's brand and the goods sold thereunder. (Id.)

Counterfeiters like Defendants embrace similar marketing strategies to Omega and are concurrently leveraging them to cause greater, more significant harm to Omega. The combination of all Defendants engaging in the same exact illegal activity for the same purpose over the same time span causes Omega irreparable harm in a way that the individual actions occurring alone might not. See, 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 Omega's marketing efforts on the Internet by blocking and consistently increasing the cost of online visibility for Omega's legitimate, authorized website. (Haller Decl. ¶ 28.) The combination of Defendants' unlawful activities increases Omega'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 Omega and consumers. (Haller Decl. ¶ 28; Compl. ¶ 24.) 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 unlawful use of the Omega Marks, Defendants are jointly obliterating the otherwise open and available marketplace space in which Omega has the right to fairly market its goods and associated message. (Id. ¶ 27.) Through their combined concurrent actions, Defendants are causing individual, concurrent, and indivisible harm to Omega and the consuming public by (i) depriving Omega of its right to fairly compete for space online and within marketing results and reducing the visibility of Omega’s genuine goods on the World Wide Web (“Web”), (ii) causing an overall degradation of the value of the goodwill associated with the Omega Marks by viewing inferior products in either the pre or post sale setting, (iii) increasing Omega’s overall cost to market its goods and educate consumers about its brand via the Web, and (iv) creating and maintaining an illegal marketplace using the Web which perpetuates the ability of Defendants to confuse consumers and harm Omega with impunity. (Id.) See, 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 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 Omega and Defendants, expend significant resources incorporating concepts and popular search terms, such as the Omega Marks, into their on-site and off-site content and advertising to promote visibility on the Web. A significant part of market targeting involves reaching a specific demographic or profile based upon a user’s search terms. Omega is doing so using its trademarks in which it has made a substantial economic investment, and Defendants are doing so through subterfuge and unlawful use of the Omega Marks. Each Defendant is helping to create and maintain the overall illicit marketplace where they market and sell their respective goods and confuse consumers.

Omega, 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 Omega’s right to fairly compete for visibility on the 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 for sale, and sell goods using counterfeits of the Omega Marks via their E-commerce Store Names. Specifically, Defendants are wrongfully

using counterfeits and infringements of the Omega Marks to increase consumer traffic to their unlawful operations. By their actions, Defendants are creating a false association in the minds of consumers between Defendants and Omega. The entry of a temporary restraining order will serve to immediately stop Defendants from benefiting from their wrongful use of the Omega Marks and preserve the status quo until such time as a hearing can be held. See Dell Inc. v. BelgiumDomains, LLC, 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 significantly alter the status quo before the Court can determine the parties' respective rights. In particular, the e-commerce stores at issue are under Defendants' complete control. Thus, Defendants can change the ownership or modify e-commerce store and private messaging account data and content, redirect consumer traffic to other e-commerce store names, change payment accounts, and transfer assets and ownership of the E-commerce Store Names. (Gigante 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 TRO, thereby thwarting the Court's ability to grant meaningful relief and can completely erase the status quo. (*Id.*) As Defendants engage in illegal counterfeiting activities, Omega 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.

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”). 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 to 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, 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)). 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). Omega’s evidence establishes all the relevant factors.

1. Probability of Success on the Merits of Plaintiff’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 (2022). Omega must demonstrate (1) ownership of the trademarks at issue; (2) Defendants’ use of the trademarks is without Omega’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). Omega’s evidence satisfies these requirements.

The first two elements of Omega’s trademark counterfeiting and infringement claims are easily met. The Omega Marks are owned by Omega and registered on the Principal Register of the United States Patent and Trademark Office, and all have become “incontestable” under 15 U.S.C. §§ 1058 and 1065. (See 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 Omega Marks. (Haller Decl. ¶¶ 14, 17.)

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.

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 Omega Marks are strong, arbitrary and fanciful marks. The Omega Marks have also acquired secondary meaning. Omega expends substantial resources in developing, advertising, and promoting the Omega Marks. (See Haller Decl. ¶¶ 8–11.) The Omega Marks enjoy widespread recognition in the United States and are prominent in the minds of consumers.

(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 Omega Marks. (Compare Compl. Ex. 1 to the Compl. with 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 Omega sells. (See Haller Decl. ¶¶ 4-5; Burns Decl. ¶ 4.) Because they bear counterfeits of the Omega Marks, Defendants’ Goods appear virtually identical to Omega’s genuine products. 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 Omega 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 Haller Decl. ¶¶ 7–8; Burns Decl. ¶ 4 and Comp. Ex. 1 thereto.) Both target the same general U.S. consumers, such that Omega 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. In a case of clear-cut copying such by Defendants herein, it is appropriate to infer Defendants intended to benefit from Omega’s reputation, to Omega’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 because Defendants are advertising, offering to sell, and selling counterfeit goods identical in appearance to those sold by Omega. (See Haller Decl. ¶¶ 16–18; 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 Omega Marks which undeniably creates the impression they are viewing

genuine goods sold or authorized by Omega. 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 Omega’s favor. Omega has therefore shown a probability of success on the merits of its trademark counterfeiting and infringement claim.

b) 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, Inc., 505 U.S. at 780. 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. Since Omega has established the merits of its trademark counterfeiting and infringement claims, a likelihood of success is also shown as to Omega’s claim for false designation of origin, common law unfair competition, and trademark infringement.

2. Plaintiff is Suffering Irreparable Injury.

As the Eleventh Circuit stated: “[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 cases like this, where a plaintiff demonstrated it will lose control of its reputation due to a defendant’s activities. Id. A likelihood of confusion exists herein as Defendants engaged in counterfeiting activities using spurious designations indistinguishable from the Omega Marks.

3. The Balance of Hardship Tips Sharply in Plaintiff’s Favor.

Omega expends substantial resources to develop the quality, reputation, and goodwill associated with the Omega Marks. (See Haller Decl. ¶¶ 8–11.) Should Defendants be permitted to continue their trade in counterfeit goods, Omega will suffer losses and irreparable injury and damage to its reputation. (Id. ¶ 29.) Defendants, though, will suffer no legitimate hardship should a temporary restraining order be issued because they have no right to engage in their present counterfeiting 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 Omega’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 Plaintiff’s Trademarks is Appropriate.

Omega requests an order requiring Defendants immediately cease all use of the Omega 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 Omega’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 Omega Marks. This Court, other courts within this district, have authorized immediate injunctive relief in similar cases involving the unauthorized use of trademarks.³

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

In addition to an order temporarily restraining Defendants’ practices, the Court should enter an order limiting the transfer of Defendants’ unlawfully gained assets. Omega demonstrated that it will likely succeed on the merits of its claims. Under 15 U.S.C. § 1117, Omega will be entitled to an accounting and payment of the profits earned by Defendants throughout the course of their

³ See, e.g., Chanel, Inc. v. Individuals, No. 23-cv-62186-ALTMAN, 2023 U.S. Dist. LEXIS 231863 (S.D. Fla. Nov. 22, 2023, docketed Nov. 28, 2023) (Order Granting *Ex Parte* Application for Entry of Temporary Restraining Order); Chanel, Inc. v. Individuals, Bus. Entities, & Unincorporated Ass’ns Identified on Schedule “A”, No. 22-22693-CIV-ALTMAN, 2022 U.S. Dist. LEXIS 244771 (S.D. Fla. Aug. 29, 2022, docketed Aug. 30, 2022) (same); Burberry Ltd. v. Individuals, No. 20-62190-CIV-ALTMAN, 2020 U.S. Dist. LEXIS 252140, (S.D. Fla. Oct. 31, 2020, docketed Nov. 4, 2020) (same); see also Chanel, Inc. v. Individuals, Bus. Entities, & Unincorporated Ass’ns Identified on Schedule “A”, No. 25-cv-20600-RKA (S.D. Fla. Feb. 11, 2025, docketed Feb. 12, 2025) (same); Chanel, Inc. v. Individuals, Bus. Entities, & Unincorporated Ass’ns Identified on Schedule “A”, No. 24-cv-24594-RKA (S.D. Fla. Nov. 25, 2024, docketed Nov. 26, 2024) (same). Accord On Clouds GmbH v. Individuals, No. 24-23160-CIV-BECERRA, 2024 U.S. Dist. LEXIS 190280 (S.D. Fla. Aug. 27, 2024, docketed Aug. 28, 2024) (same); Malletier v. Individuals, No. 24-23194-CIV-RUIZ, 2024 U.S. Dist. LEXIS 188550 (S.D. Fla. Aug. 26, 2024, docketed Aug. 27, 2024) (same); Whirlpool Corp. v. Individuals, No. 24-61253-CIV-SMITH, 2024 U.S. Dist. LEXIS 187675 (S.D. Fla. Aug. 20, 2024) (same); Tiffany (NJ) LLC v. Individuals, No. 24-61345-CIV-DIMITROULEAS, 2024 U.S. Dist. LEXIS 156996 (S.D. Fla. July 30, 2024) (same); Chanel, Inc. v. Individuals, No. 24-22336-CIV-BLOOM, 2024 U.S. Dist. LEXIS 158234 (S.D. Fla. June 24, 2024) (same).

counterfeiting scheme. 15 U.S.C. § 1117(a) (2025). Due to the deceptive nature of the counterfeiting business, and Defendants' deliberate violations of federal trademark laws, Omega respectfully requests this Court grant additional *ex parte* relief identifying payment accounts and restraining the transfer of all monies held or received by PayPal, or other financial institutions for the benefit of any one or more of the Defendants, and financial accounts tied thereto. See Int'l Star Class Yacht Racing Ass'n v. Tommy Hilfiger USA, Inc., 80 F.3d 749 (2d Cir. 1996); SEC v. ETS Payphones, 408 F.3d 727, 735 (11th Cir. 2005) (restraining all of defendant's assets to preserve sufficient funds for the potential disgorgement).

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

Considering the illicit nature of the counterfeiting business and the ability of counterfeiters to practically eliminate evidentiary trails by conducting their business entirely over the Internet, courts in the Eleventh Circuit, 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. U.S. Oil and Gas Corp., 748 F.2d 1431, 1433–34 (11th Cir.1984) (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, 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) (court may restrain assets not specifically traced to illegal activity). In substantially similar cases, this Court and others within this district have entered the precise relief sought herein.⁴

⁴ See e.g., See e.g., Chanel, Inc. v. Individuals, No. 23-cv-62186-ALTMAN, 2023 U.S. Dist. LEXIS 231863 (S.D. Fla. Nov. 22, 2023, docketed Nov. 28, 2023) (Order granting TRO, *inter alia*, restraining funds held or received by financial institution to preserve assets to satisfy Plaintiff's requested relief); Chanel, Inc. v. Individuals, Bus. Entities, & Unincorporated Ass'ns Identified on Schedule "A", No. 22-22693-CIV-ALTMAN, 2022 U.S. Dist. LEXIS 244771 (S.D. Fla. Aug. 29, 2022, docketed Aug. 30, 2022) (same); Burberry Ltd. v. Individuals, No. 20-62190-CIV-ALTMAN, 2020 U.S. Dist. LEXIS 252140, (S.D. Fla. Oct. 31, 2020, docketed Nov. 4, 2020) (same); see also Chanel, Inc. v. Individuals, Bus. Entities, & Unincorporated Ass'ns Identified on Schedule "A", No. 25-cv-20600-RKA (S.D. Fla. Feb. 11, 2025, docketed Feb. 12, 2025) (same); Chanel, Inc. v. Individuals, Bus. Entities, & Unincorporated Ass'ns Identified on Schedule "A", No. 24-cv-24594-RKA (S.D. Fla. Nov. 25, 2024, docketed Nov. 26, 2024) (same). Accord On Clouds GmbH v.

In Reebok v. Marnatech, the District Court granted Reebok a limited restraint of the defendants' assets for the purpose of preserving those assets, ensuring 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. 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

Individuals, No. 24-23160-CIV-BECERRA, 2024 U.S. Dist. LEXIS 190280 (S.D. Fla. Aug. 27, 2024, docketed Aug. 28, 2024) (same); Malletier v. Individuals, No. 24-23194-CIV-RUIZ, 2024 U.S. Dist. LEXIS 188550 (S.D. Fla. Aug. 26, 2024, docketed Aug. 27, 2024) (same); Whirlpool Corp. v. Individuals, No. 24-61253-CIV-SMITH, 2024 U.S. Dist. LEXIS 187675 (S.D. Fla. Aug. 20, 2024) (same); Tiffany (NJ) LLC v. Individuals, No. 24-61345-CIV-DIMITROULEAS, 2024 U.S. Dist. LEXIS 156996 (S.D. Fla. July 30, 2024) (same); Chanel, Inc. v. Individuals, No. 24-22336-CIV-BLOOM, 2024 U.S. Dist. LEXIS 158234 (S.D. Fla. June 24, 2024) (same).

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' assets upon finding that advance notice would likely have caused the defendants to 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).

In this case, 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, Omega has additional cause for *ex parte* relief, as Defendants may easily secret or transfer their assets without the Court's or Omega'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 Omega's evidence, Omega 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, Omega 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. Furthermore, due to the time provisions of a temporary restraining order, in the event the application is granted, Omega respectfully requests the Court provide a copy of the order to Omega's counsel via e-mail at leo@smgpa.cloud so that Omega may immediately effectuate any relief ordered therein and provide Defendants proper notice of the order and any subsequent hearing date.

DATED: March 10, 2025.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **Virgilio Gigante**

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SCHEDULE “A”
DEFENDANTS BY NUMBER, E-COMMERCE STORE NAME,
FINANCIAL ACCOUNT INFORMATION, AND MEANS OF CONTACT

Def. No	Defendant / E-commerce Store Name	Merchant ID / Payment Account	Payee	Means of Contact Email and WhatsApp
1	elitetimepiecesusa.com	XF8JX56CLQ4W2		support@elitetimepiecesusa.com support@6188530.brevosend.com WhatsApp: +1 (479) 3852889
1	coolsar.com	J79H4KM6LZZ84		support@coolsar.com WhatsApp: 1 (479) 3852889
1	doxsd.com	7KWHCH8PYSKH2		support@doxsd.com WhatsApp: 1 (479) 3852889
1	atinowatch.com	ZFVH3DZH2EV2J		support@atinowatch.com
1	luxyswear.com	ZFVH3DZH2EV2J		support@luxyswear.com WhatsApp: 1 (479) 3852889
1	opulencewrist.com	XF8JX56CLQ4W2		support@opulencewrist.com support@6188530.brevosend.com WhatsApp: +1 (479) 3852889
2	ksisx.shop	TVRR7LL3B9XEA	Hong Kong M&K Technology & Tradinglimited	watchbuybuy@outlook.com hibuynew@gmail.com WhatsApp: 12812360702; 17622611080
2	euex.shop	2ZUFV3JK8Z8JC	Sen Yue Trade Limited	watchbuybuy@outlook.com hibuynew@gmail.com WhatsApp: 12812360702; 17622611080
		3AMZJVC87CY74	Guoqi Trading Co., Limited	
		3RA3PR444BTDY	HK Xinyue Trading Co., Limited	
		CHCDN2AFTE26S	HK Houyu Trading Limited	
		TVRR7LL3B9XEA	Hong Kong M&K Technology & Tradinglimited	
		W2HXY878SLV3S	Zhikang Limited	
		Z3PJH9X3NGRXJ	Tung Ho Shing Taitrading Co.. Limited	
		EG2PXB8AKBT6Q	Hong Kong Ideal Culture Limited	

2	kibux.site	38WL7SQ4N9H26	Kingdem Culture Industrial Investment(Hong Kong)Company Limited	ultramall@zohomail.com
		78DSD3BNVUY2Y	HK Fanlanoi Clothing Limited	
		DPKQU7PDGXE7U	Haoyuan Home Furnishiing Co., Limited	
		FPRLYDVL5Y6VY	Hong Kong Step Trading Co., Limited	
		JVHPBY2J62WTE	Sino Explore Investment Limited	
		W2HXY878SLV3S	Zhikang Limited	
2	bezs.shop	DPKQU7PDGXE7U	Haoyuan Home Furnishiing Co., Limited	ultramall@zohomail.com
		Z3PJH9X3NGRXJ	Tung Ho Shing Taitrading Co.. Limited	
		7YUQTNJ8G4P7N	Xinyuan Ornaments Co.. Limited	
		CHUHR5JWZADZC	Weinuo Clothing Limited	
		E62QV2AG8JH3S	Hong Kong Xian Litong Trading Co.Limited	
		KUWBAFX832SFY	HK Shiji Jiali Trading Limited	
		PB8AQLX2JQVEC	Sanbao Jewelry Limited	
2	slrw.shop	DPKQU7PDGXE7U	Haoyuan Home Furnishiing Co., Limited	ultramall@zohomail.com
		W2HXY878SLV3S	Zhikang Limited	
		78DSD3BNVUY2Y	HK Fanlanoi Clothing Limited	
		R34R69PFFDG4G	Goodluck Jewelry Co.. Limmited	
3	aniwattey.shop	WR76DQM5YWGGs	wuyang store	
4	zenithluxys.com	EY6D9CE8EGD6J		support@zenithluxy.com WhatsApp: (+1469) 587-0120

4	luxurytick.com	JPBUGW5YVU24A		support@luxurytick.com WhatsApp: (+1469) 587-0120
4	atinolux.com	K7T5HRLFFR326		support@atinolux.com WhatsApp: (+1469) 587-0120
4	relaxtee.com	JPBUGW5YVU24A		contact@relaxtee.com WhatsApp: +1 (979)-279-8357
5	jobuly.com	9QDAADBVFHM8A	山东超众阀门管件有限公司	jobulywatch@gmail.com WhatsApp: 18182575506
5	bedliy.com	9QDAADBVFHM8A	山东超众阀门管件有限公司	bedliyrole@outlook.com WhatsApp: 13462818224
6	camillaluxury.shop	VBMDKUL3KEA3C	广州狎集网络科技有限公司	Wathcesvipcenter@hotmail.com WhatsApp: 12135565295
7	chrono26.com	QDACM53V63EEA	Unlock your imagination	support@chrono26.com suppoprt@chrono26.com support@nuewatch.com
8	clonewatches.com	QPG9CFKC3EZY	Master	support@clonewatches.com WhatsApp: 447410208835
9	dennistoystore.com	QRS8SS2M3JMKA		473613@qq.com
10	dunekhing.com	WZTXG85P3BVBJ	Moon Halo Limited	support@roseliay.com
		XXCGH5AV26SF8	厦门玩物上治品牌设计有限公司	WhatsApp: 8613652381765
10	weistwatch.com	K6K9K7VZM923W		support@roseliay.com WhatsApp: 12137919605
10	kimmyis.com	EFSMSNLZY84N6		support@roseliay.com WhatsApp: 15109774882
10	sunfdht.com	TDTCRQZXBYP2	Hong Kong Weixiaoyun Technology Co., Limited	
11	gccista.shop	7PLZRLUFWNN72	Anhui Ningteng Trading Co., Ltd	gccista@outlook.com
12	gclvg.com	SLMPEN3CAFCZ4	Shaanxi Benxin Chaojia Trading Co.,Ltd.	support@gclvg.com WhatsApp: 447856199796

13	getwatchpro.com	G9G82PVAFA6SA	Fashion is unlimited, beauty is unlimited	watcesgot@gmail.com WhatsApp: 12812360778
13	rallx.store	G9G82PVAFA6SA	Fashion is unlimited, beauty is unlimited	watcesgot@gmail.com CortinasHanss@gmail.com WhatsApp: 12812360778
14	high-w.store	ASN8376P57HMS	OMG	nartofortest@gmail.com WhatsApp: 14152258725
14	top-swisstime.com	DPRD9DF7Z7CYE	fanjin	support@top-swisstime.com WhatsApp: 14152258725; 15042363820
15	hy-premium-watch.com	JT4N64HXEG6W4		huangmangman@outlook.com support@hy-premium-watch.com
		2732188342@qq.com		WhatsApp: 18153295760
16	idc022.com	96FCHQ4WMZG2G	IDC022	hitea777@outlook.com WhatsApp: 8613926757799; 8618675426777
17	luxnob.com	2LRHW98MQKWT4	武平县梓靖日用品店	support@luxnob.com riversky@luxnob.com
		15505970418@163.com		WhatsApp: 447477483455; 447443756893
18	luxtick.com	UT4MLXBV65NFQ	Timelesstunes records	support@luxtick.com WhatsApp: 16232020012
19	luxuriousluxurywardrobe.com	7QWGQQ6X83MZG		llwardrobe999@gmail.com WhatsApp: 8613178848887
20	luxurywatchessthlm.com	DNZ7JJB4Q2PXG	YoungSong (HongKong) Co., Limited	support@rrolxwatch.com support@luxurywatchessthlm.com WhatsApp: 46(0)86121088; 13213063327
21	luxuwatchs.com	X9FA8RZRLWF4S	旺达（广州）传媒科 技有限公司	sswisswatchesafter@gmail.com
22	luxyavia.com	7Y4U6FNY7H2HG		support@luxyavia.com
23	menymoon.shop	3K8FZNUZWDWXE	Waiyian Shop	
24	nic-watch.com	PJ3UVFT94E6MN		nicwatch01@gmail.com WhatsApp: 8618285839977

25	ocga.store	YFWP5ZCRAB4DW	Hong Kong Changzhifeng Trading Co.,Limited	nicechicbuy@gmail.com chicsgo@zohomail.com WhatsApp: 18323325572; 4082078438; 12817772895
26	panda188.store	HRH24FFTPLLXS	嘉兴乾源贸易有限公司	pandaluxurywatch@gmail.com WhatsApp: 12132654084; 15107174505
27	pdkicks.com	MU8VNGD7EMUMS	PD.Kicks.Co.Ltd	ceryslin2424@gmail.com support@pdkicks.com WhatsApp: 8615759912623
28	premiumwatchs.com	87UHSVH32337Q	Hevision Enterprises Pte. Ltd	service@luxurywatchs.com Support@premiumwatchs.com
29	sayhiyy.com	YG7C3GQBDSQ36	深圳市麦尔富电子商务有限公司	sayhiyy01@outlook.com anglebabemia@gmail.com
30	treasurk.com	NPLSBT6RD7QAA	海伦市慕薇诗美甲店	gennapawelek@gmail.com 123456@gmail.com WhatsApp: 85253381445
31	trivorshop.com	GJY3SNFSSSWQ4	randtime	watchvipservice@hotmail.com WhatsApp: 8614739706838
32	vernaculars.shop	9M47DCTGZK6N2	Huzhou Ningdajia Trading Co., Ltd	enuertiom@outlook.com
33	warringtac.shop	6EJK56MM5HWT4	Busby Louise	jsjasmine04@gmail.com service@billuxury.com
34	watchwsr.com	PAPSD5P32WKBL		higherwatch@outlook.com WhatsApp: 8613587735699
35	willy001.willyweb.shop	KU2S9PVJZSMQG	EMAYA—wcc	wzt952541276@gmail.com WhatsApp: 8615170471004