

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO.**

RICHEMONT INTERNATIONAL SA,  
CARTIER INTERNATIONAL A.G.,  
CHLOE S.A.S., MONTBLANC-SIMPLO  
GMBH, and VAN CLEEF & ARPELS SA,

Plaintiffs,

vs.

CARTIERWATCH.TO; 12TWE.COM; 24COLLECTOR.COM;  
AAAGOODWATCH.COM; AAA-REPLICAWATCH.CO;  
AAAWATCHES.IO a/k/a CHOOSSETOPWATCHES.COM a/k/a  
COPYWATCHESINUK.CO.UK a/k/a DESIGNERREPLICA.NL a/k/a  
NICEWATCHESSHOP.COM a/k/a REPLICAWATCHESHOT.ORG  
a/k/a REPLICAWATCHESQUALITY.BIZ a/k/a  
REPLICAWATCHES-SHOP.ORG a/k/a  
REPLICAWATCHESVIP.COM a/k/a REPLICAWATCHKING.COM  
a/k/a SHAREWATCHES.CZ a/k/a TOPREPLICAWATCHES.XYZ;  
AFFORDABLEWATCHES.IO; ANYREPLICAWATCHES.CO.COM;  
AOMWATCHES.IS; APPETI.TO; ARREPLICAWATCHES.COM;  
BESTCLONWATCHES.COM; BESTREPWATCH.CC;  
BESTTIME24H.COM; BRDREPLICAS.RU a/k/a  
SELLINGPLAZA.RU a/k/a SELLPLAZA.RU;  
BUYREPLICAWATCHES.IO; BUYREPLICAWATCHES.ME a/k/a  
GMREPLICA.COM a/k/a GOODYWATCH.ME a/k/a  
INKSKIDS.COM a/k/a MSOPBS.COM a/k/a USREPLICA.ME;  
BUYUKWATCHES.US; BUYWATCH.COM.RU;  
CCHENWATCH.COM; CHINANOOBFACTORY.COM;  
CHINANOOBWATCH.IO a/k/a CHINANOOBWATCH.TO;  
CITYTEETIME.COM a/k/a REPLIKROLEXUHREN.DE;  
COPYLUXURYWATCH.COM a/k/a COPYWATCHSTYLE.COM;  
COPYWATCHALIKE.CO; COPYWATCHES2019.COM; D4LL.CO;  
DESIGNERSDISCREET.RU; DRDELUX.COM; FALSIOROLOGI.IT;  
FBESTWATCH.COM a/k/a REPLICAWATCHESALE.COM a/k/a  
REPLICAWATCHESDAY.COM a/k/a REPLICAWATCHESI.COM  
a/k/a SOREPLICAWATCHES.COM a/k/a YBESTWATCH.COM;  
FIRSTWATCHCLONE.CO; FOMSHOP.ML;  
GDWATCHCLONE.RU; GEEKTIME.CC;  
HELLOROLEXDEALER.ME; IDOLPRODUCTS.COM;  
IWCSHOP.IS; IWCWATCH.TO; JEWELSDO.COM;  
KARANFRANK.COM; KARINAKOUTURE.RU;  
LUXEJEWELRYAAA.COM; LUXUWATCHESUNDER.RU;  
MANUALCELAVIVE.COM; MIROTIME.CO; MOWATCH.ORG;

NEWWATCHESALE.COM; NICEFAKEWATCHES.COM;  
NOOBWATCH.COM; NOOBWATCH.CC; OTS-WATCHES.CO;  
OURSREPLICA.COM a/k/a UKREPLICAWATCHES.NET;  
PERFECT-ARW.COM; PERFECTCHRONO.RU;  
PERFECTWATCH.TO; PGWATCH.IS; POPHOTWATCHES.COM;  
PULP.TC; QUALITYWATCHESDEPOT.TO a/k/a  
SWISSWATCHESHQ.COM; REPBARGAINS.COM;  
REPLICAMAGIC1.TO; REPLICAWATCH.PRO;  
REPLICAWATCH.SU; REPLICAWATCHPRICE.COM a/k/a  
SWISSCLONEWATCH.COM; REPLICAWATCHESINDUBAI.COM;  
REPLICAWATCHESSTORE.TO; SHOPREPLICA.EU;  
SHOPS1T.ML a/k/a SVIPSHOP1S.GA; SUPERCLONE.WATCH;  
TOP10REPLICAWATCHES.COM; UBOATMENS.COM;  
UKWATCH.CZ; UREPLICAWATCH.COM; UTOPIAWATCH.COM;  
VCWSHOP.COM; WATCHESCARTIER.TO; WATCHESIWC.TO;  
WATCHESKEEP.COM; WATCHESYO.CO;  
WATCHISCLOCK.COM; WATCHREPLICA.IS;  
WONKALUXURY.COM; WRISTCLONE.RU; and YEPBRAND.RU,  
Each an Individual, Business Entity, or Unincorporated Association,

Defendants.

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### **COMPLAINT FOR INJUNCTIVE RELIEF AND DAMAGES**

Plaintiffs, Richemont International SA, Cartier International A.G., Chloe S.A.S., Montblanc-Simplo GMBH, and Van Cleef & Arpels SA (collectively “Plaintiffs”),<sup>1</sup> hereby sue Defendants, the Individuals, Business Entities, and Unincorporated Associations, identified in the caption above and set forth on Schedule “A” hereto (collectively “Defendants”). Defendants are promoting, selling, offering for sale and/or distributing goods within this district bearing and/or using counterfeit and confusingly similar imitations of Plaintiffs’ respective trademarks through at least the fully interactive commercial Internet websites and supporting domains operating under the domain names set forth on Schedule “A” hereto (the “Subject Domain Names”). In support of their claims, Plaintiffs allege as follows:

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<sup>1</sup> Plaintiffs are all subsidiaries of Compagnie Financière Richemont SA, which is one of the world’s leading luxury goods groups.

## **JURISDICTION AND VENUE**

1. This is an action for federal trademark counterfeiting and infringement, false designation of origin, cybersquatting, common law unfair competition, and common law trademark infringement pursuant to 15 U.S.C. §§ 1114, 1116, 1125(a), and 1125(d), The All Writs Act, 28 U.S.C. § 1651(a), and Florida’s common law. Accordingly, this Court has subject matter jurisdiction over this action pursuant to 15 U.S.C. § 1121 and 28 U.S.C. §§ 1331 and 1338. This Court has supplemental jurisdiction pursuant to 28 U.S.C. § 1367 over Plaintiffs’ state law claims because those claims are so related to the federal claims that they form part of the same case or controversy.

2. Defendants are subject to personal jurisdiction in this district because they operate commercial websites accessible in this district, conduct business by registering and maintaining commercial Subject Domain Names registered within the United States, and/or direct business activities toward consumers throughout the United States, including within the State of Florida and this district, through at least the fully interactive commercial Internet websites and supporting domains operating under the Subject Domain Names.<sup>2</sup> Alternatively, Defendants are subject to personal jurisdiction in this district pursuant to Federal Rule of Civil Procedure 4(k)(2) because (i) Defendants are not subject to jurisdiction in any state’s court of general jurisdiction; and (ii) exercising jurisdiction is consistent with the United States Constitution and laws.

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<sup>2</sup> Several Defendants use supporting domain names to automatically redirect and forward consumers to, at least, one of their fully interactive, commercial Internet websites operating under one of the Subject Domain Names. These redirecting websites are identified as such in Composite Exhibit “9” attached hereto.

3. Venue is proper in this Court pursuant to 28 U.S.C. § 1391. Defendants are, upon information and belief, aliens who engage in infringing activities and cause harm within this district by advertising, offering to sell and/or selling infringing products into this district.

**THE PLAINTIFFS**

4. Plaintiff Richemont International SA (“Richemont”) is a public limited company organized and existing under the laws of Switzerland, having its principal place of business at 10 Route des Biches, Villars-sur-Glane, Fribourg, Switzerland. Richemont’s Maisons include, *inter alia*, IWC Schaffhausen (“IWC”) Piaget (“Piaget”), Roger Dubuis (“Roger Dubuis”), and Vacheron Constantin (“Vacheron Constantin”).

5. Plaintiff Cartier International A.G. (“Cartier”) is a public limited company organized and existing under the laws of Switzerland, having its principal place of business at Hinterbergstrasse 22, Postfach 61, 6312 Steinhausen, Switzerland.

6. Plaintiff Chloe S.A.S. (“Chloe”) is a company organized and existing under the laws of France, having its principal place of business at 5/7 Avenue Percier, 75008 Paris, France.

7. Plaintiff Montblanc-Simplo GMBH (“Montblanc”) is a company organized and existing under the laws of Germany, having its principal place of business at Hellgrundweg 100, 22525 Hamburg, Germany.

8. Plaintiff Van Cleef & Arpels SA (“Van Cleef”) is a company organized and existing under the laws of Switzerland, having its principal place of business at 8 Route des Biches, CH-1752 Villars-sur-Glane, Switzerland.

9. Plaintiffs’ trademarked goods are offered for sale and sold within the State of Florida, including within this district. Defendants, through the advertising, offering for sale, and sale of counterfeit and infringing versions of Plaintiffs’ branded products, are directly, and

unfairly, competing with Plaintiffs' economic interests in the State of Florida and causing Plaintiffs harm and damage within this jurisdiction.

10. Like many other famous trademark owners, Plaintiffs suffer ongoing daily and sustained violations of their respective trademark rights at the hands of counterfeiters and infringers, such as Defendants herein, who wrongfully reproduce and counterfeit Plaintiffs' individual trademarks for the twin purposes of (i) duping and confusing the consuming public and (ii) earning substantial profits across their e-commerce websites.

11. To combat the indivisible harm caused by the combined actions of Defendants and others engaging in similar conduct, each year Plaintiffs expend significant monetary resources in connection with trademark enforcement efforts, including legal fees, investigative fees, and support mechanisms for law enforcement, such as field training guides and seminars. The exponential growth of counterfeiting over the Internet has created an environment that requires companies, such as Plaintiffs, to file a large number of lawsuits, often it later turns out, against the same individuals and groups, in order to protect both consumers and themselves from the ill effects of confusion and the erosion of the goodwill associated with Plaintiffs' respective brands.

### **THE DEFENDANTS**

12. Defendants operate through domain names registered with registrars in multiple countries, including the United States, and are comprised of individuals, business entities of unknown makeup, or unincorporated associations each of whom, upon information and belief, likely reside and/or operate in foreign jurisdictions, or redistribute products from the same or similar sources in those locations. Defendants have the capacity to be sued pursuant to Federal Rule of Civil Procedure 17(b). Defendants direct their business activities towards consumers throughout the world, including the United States and within this district, through the simultaneous

operation of at least the interactive commercial Internet websites and supporting domains existing under the Subject Domain Names.

13. Defendants use aliases in conjunction with the operation of their businesses, including but not limited to those identified by Defendant Number on Schedule “A” hereto.

14. Defendants are directly and personally contributing to, inducing and engaging in the sale of counterfeit branded products as alleged herein, often times as partners, co-conspirators and/or suppliers.

15. Defendants are part of an ongoing scheme to create and maintain an illegal marketplace enterprise on the World Wide Web, which (i) confuses consumers regarding the source of Defendants’ goods for profit, and (ii) expands the marketplace for illegal, counterfeit versions of Plaintiffs’ branded goods while shrinking the legitimate marketplace for Plaintiffs’ genuine branded goods. The natural and intended byproduct of Defendants’ actions is the erosion and destruction of the goodwill associated with Plaintiffs’ respective famous names and associated trademarks, as well as the destruction of the legitimate market sector in which they operate.

16. Defendants are the past and/or present controlling forces behind the operation of the Internet websites operating under, at least, the Subject Domain Names.

17. Defendants directly engage in unfair competition with Plaintiffs by (i) advertising, offering for sale and/or selling goods bearing and/or using counterfeits and infringements of one or more of Plaintiffs’ individual trademarks to consumers within the United States and this district through at least the interactive commercial Internet websites and supporting domains operating under the Subject Domain Names, and any additional domains and websites not yet known to Plaintiffs and (ii) creating and maintaining an illegal marketplace enterprise for the purpose of diverting business from Plaintiffs’ legitimate marketplace for their genuine goods. Defendants

have purposefully directed some portion of their illegal activities towards consumers in the State of Florida through the advertisement, offer to sell, and/or sale of counterfeit branded goods into the State, and by operating an illegal marketplace enterprise which impacts and interferes with legitimate commerce throughout the United States, including within the State of Florida.

18. Defendants have registered, established or purchased, and maintained their respective Subject Domain Names and the websites operating thereunder. Upon information and belief, many Defendants have engaged in fraudulent conduct with respect to the registration of the Subject Domain Names by providing false and/or misleading information to their various registrars during the registration or maintenance process. Many Defendants have registered and/or maintained their Subject Domain Names to engage in illegal counterfeiting activities.

19. Defendants will likely continue to register or acquire new domain names for the purpose of selling and/or offering for sale goods bearing and/or using counterfeit and confusingly similar imitations of Plaintiffs' respective trademarks unless preliminarily and permanently enjoined. Moreover, Defendants will likely continue to maintain and grow their illegal marketplace enterprise at Plaintiffs' expense unless preliminarily and permanently enjoined.

20. Defendants' Subject Domain Names and any other domain names and aliases used in connection with the sale of counterfeit and infringing goods bearing and/or using Plaintiffs' respective trademarks are essential components of Defendants' counterfeiting and infringing activities and are the means by which Defendants further their counterfeiting and infringement scheme and cause harm to Plaintiffs. Moreover, Defendants are using Plaintiffs' respective famous names and associated trademarks to drive Internet consumer traffic to their websites operating under the Subject Domain Names, thereby creating and increasing the value of the Subject Domain

Names and decreasing the size and value of Plaintiffs' legitimate consumer marketplace at Plaintiffs' expense.

### **COMMON FACTUAL ALLEGATIONS**

#### **Richemont's Trademark Rights**

21. Richemont is the owner of all rights, title, and interest in the IWC, Piaget, Roger Dubuis, and Vacheron Constantin trademarks identified on Schedule "B" hereto, which are valid and registered on the Principal Register of the United States Patent and Trademark Office (the "IWC Marks," "PIAGET Marks," "ROGER DUBUIS Marks," and "VACHERON CONSTANTIN Marks," respectively).

22. The IWC Marks are used in conjunction with the manufacture and distribution of high-quality goods in the categories identified in Schedule "B-1." True and correct copies of the Certificates of Registration for the IWC Marks are attached hereto as Composite Exhibit "1."

23. The IWC Marks have been used in interstate commerce to identify and distinguish IWC's high-quality goods for an extended period of time and serves as a symbol of IWC's quality, reputation and goodwill.

24. Further, IWC expends substantial resources developing, advertising and otherwise promoting the IWC Marks. The IWC Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

25. IWC extensively uses, advertises and promotes the IWC Marks in the United States in connection with the sale of high-quality goods. As a result, the IWC Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as an identifier of high-quality goods.



26. IWC has carefully monitored and policed the use of the IWC Marks and has never assigned or licensed the IWC Marks to any Defendant in this matter.

27. Genuine goods bearing and/or using the IWC Marks are widely legitimately advertised and promoted by IWC, its authorized distributors, and unrelated third parties via the Internet. Visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to IWC's overall marketing and consumer education efforts. Thus, IWC expends significant monetary resources on Internet marketing and consumer education, including search engine optimization ("SEO") and search engine marketing ("SEM") strategies. Those strategies allow IWC and its authorized retailers to educate consumers fairly and legitimately about the value associated with the IWC Marks and the goods sold thereunder.

28. The PIAGET Marks are used in conjunction with the manufacture and distribution of high-quality goods in the categories identified in Schedule "B-2." True and correct copies of the Certificates of Registration for the PIAGET Marks are attached hereto as Composite Exhibit "2."

29. The PIAGET Marks have been used in interstate commerce to identify and distinguish Piaget's high-quality goods for an extended period of time and serves as a symbol of Piaget's quality, reputation and goodwill.

30. Further, Piaget has expended substantial time, money and other resources developing, advertising and otherwise promoting the PIAGET Marks. The PIAGET Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

31. Piaget has extensively used, advertised and promoted the PIAGET Marks in the United States in connection with the sale of high-quality luxury goods. As a result, the PIAGET

Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as an identifier of high-quality goods.

32. Piaget has carefully monitored and policed the use of the PIAGET Marks and has never assigned or licensed the PIAGET Marks to any Defendant in this matter.

33. Genuine goods bearing and/or using the PIAGET Marks are widely legitimately advertised and promoted by Piaget, its authorized distributors, and unrelated third parties via the Internet. Visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Piaget's overall marketing and consumer education efforts. Thus, Piaget expends significant monetary resources on Internet marketing and consumer education, including SEO and SEM strategies. Those strategies allow Piaget and its authorized retailers to educate consumers fairly and legitimately about the value associated with the PIAGET Marks and the goods sold thereunder.

34. The ROGER DUBUIS Marks are used in conjunction with the manufacture and distribution of high-quality goods in the categories identified in Schedule "B-3." True and correct copies of the Certificates of Registration for the ROGER DUBUIS Marks are attached hereto as Composite Exhibit "3."

35. The ROGER DUBUIS Marks have been used in interstate commerce to identify and distinguish Roger Dubuis's high-quality goods for an extended period of time and serves as a symbol of Roger Dubuis's quality, reputation and goodwill.

36. Further, Roger Dubuis has expended substantial time, money and other resources developing, advertising and otherwise promoting the ROGER DUBUIS Marks. The ROGER DUBUIS Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

37. Roger Dubuis has extensively used, advertised and promoted the ROGER DUBUIS Marks in the United States in connection with the sale of high-quality luxury goods. As a result, the ROGER DUBUIS Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as an identifier of high-quality goods.

38. Roger Dubuis has carefully monitored and policed the use of the ROGER DUBUIS Marks and has never assigned or licensed the ROGER DUBUIS Marks to any Defendant in this matter.

39. Genuine goods bearing and/or using the ROGER DUBUIS Marks are widely legitimately advertised and promoted by Roger Dubuis, its authorized distributors, and unrelated third parties via the Internet. Visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Roger Dubuis's overall marketing and consumer education efforts. Thus, Roger Dubuis expends significant monetary resources on Internet marketing and consumer education, including SEO and SEM strategies. Those strategies allow Roger Dubuis and its authorized retailers to educate consumers fairly and legitimately about the value associated with the ROGER DUBUIS Marks and the goods sold thereunder.

40. The VACHERON CONSTANTIN Marks are used in conjunction with the manufacture and distribution of high-quality goods in the categories identified in Schedule "B-4." True and correct copies of the Certificates of Registration for the VACHERON CONSTANTIN Marks are attached hereto as Composite Exhibit "4."

41. The VACHERON CONSTANTIN Marks have been used in interstate commerce to identify and distinguish Vacheron Constantin's high-quality goods for an extended period of time and serves as a symbol of Vacheron Constantin's quality, reputation and goodwill.

42. Further, Vacheron Constantin has expended substantial time, money and other resources developing, advertising and otherwise promoting the VACHERON CONSTANTIN Marks. The VACHERON CONSTANTIN Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

43. Vacheron Constantin has extensively used, advertised and promoted the VACHERON CONSTANTIN Marks in the United States in connection with the sale of high-quality luxury goods. As a result, the VACHERON CONSTANTIN Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as an identifier of high-quality goods.

44. Vacheron Constantin has carefully monitored and policed the use of the VACHERON CONSTANTIN Marks and has never assigned or licensed the VACHERON CONSTANTIN Marks to any Defendant in this matter.

45. Genuine goods bearing and/or using the VACHERON CONSTANTIN Marks are widely legitimately advertised and promoted by Vacheron Constantin, its authorized distributors, and unrelated third parties via the Internet. Visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Vacheron Constantin's overall marketing and consumer education efforts. Thus, Vacheron Constantin expends significant monetary resources on Internet marketing and consumer education, including SEO and SEM strategies. Those strategies allow Vacheron Constantin and its authorized retailers to educate consumers fairly and legitimately about the value associated with the VACHERON CONSTANTIN Marks and the goods sold thereunder.

**Cartier's Trademark Rights**

46. Cartier is the owner of all rights in and to the trademarks identified on Schedule "C" hereto (collectively, the "CARTIER Marks"), which are valid and registered on the Principal Register of the United States Patent and Trademark Office. The CARTIER Marks are used in conjunction with the manufacture and distribution of high-quality goods in the categories identified in Schedule "C." True and correct copies of the Certificates of Registration for the CARTIER Marks are attached hereto as Composite Exhibit "5."

47. The CARTIER Marks have been used in interstate commerce to identify and distinguish Cartier's high-quality goods for an extended period of time and serve as a symbol of Cartier's quality, reputation and goodwill.

48. Further, Cartier and related companies expend substantial resources developing, advertising and otherwise promoting the CARTIER Marks. The CARTIER Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

49. Cartier and related companies extensively use, advertise and promote the CARTIER Marks in the United States in connection with the sale of high-quality goods. As a result, the CARTIER Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as an identifier of high-quality goods.

50. Cartier has carefully monitored and policed the use of the CARTIER Marks and has never assigned or licensed the CARTIER Marks to any Defendant in this matter.

51. Genuine goods bearing and/or using the CARTIER Marks are widely legitimately advertised and promoted by Cartier and related companies, and authorized distributors via the Internet. Visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Cartier's overall marketing and consumer

education efforts. Thus, Cartier expends significant monetary resources on Internet marketing and consumer education, including SEO and SEM strategies. Those strategies allow Cartier and its authorized retailers to educate consumers fairly and legitimately about the value associated with the CARTIER Marks and the goods sold thereunder.

**Chloe's Trademark Rights**

52. Chloe is the owner of all rights in and to the trademarks identified on Schedule "D" hereto (collectively, the "CHLOE Marks"), which are valid and registered on the Principal Register of the United States Patent and Trademark Office. The CHLOE Marks are used in conjunction with the manufacture and distribution of high quality goods in the categories identified in Schedule "D." True and correct copies of the Certificates of Registration for the CHLOE Marks are attached hereto as Composite Exhibit "6."

53. The CHLOE Marks have been used in interstate commerce to identify and distinguish Chloe's high-quality goods for an extended period of time and serve as a symbol of Chloe's quality, reputation and goodwill.

54. Further, Chloe expends substantial resources developing, advertising and otherwise promoting the CHLOE Marks. The CHLOE Marks qualify as a famous marks as that term is used in 15 U.S.C. §1125(c)(1).

55. Chloe extensively uses, advertises and promotes the CHLOE Marks in the United States in connection with the sale of high-quality goods. As a result, the CHLOE Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as an identifier of high-quality goods.

56. Chloe has carefully monitored and policed the use of the CHLOE Marks and has never assigned or licensed the CHLOE Marks to any Defendant in this matter.

57. Genuine goods bearing and/or using the CHLOE Marks are widely legitimately advertised and promoted by Chloe, its authorized distributors, and unrelated third parties via the Internet. Visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Chloe's overall marketing and consumer education efforts. Thus, Chloe expends significant monetary resources on Internet marketing and consumer education, including SEO and SEM strategies. Those strategies allow Chloe and its authorized retailers to educate consumers fairly and legitimately about the value associated with the CHLOE Marks and the goods sold thereunder.

**Montblanc's Trademark Rights**

58. Montblanc is the owner of all rights in and to the trademarks identified on Schedule "E" hereto (collectively, the "MONTBLANC Marks"), which are valid and registered on the Principal Register of the United States Patent and Trademark Office. The MONTBLANC Marks are used in conjunction with the manufacture and distribution of high-quality goods in the categories identified in Schedule "E." True and correct copies of the Certificates of Registration for the MONTBLANC Marks are attached hereto as Composite Exhibit "7."

59. The MONTBLANC Marks have been used in interstate commerce to identify and distinguish Montblanc's high-quality goods for an extended period of time and serve as a symbol of Montblanc's quality, reputation and goodwill.

60. Further, Montblanc expends substantial resources developing, advertising and otherwise promoting the MONTBLANC Marks. The MONTBLANC Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

61. Montblanc extensively uses, advertises and promotes the MONTBLANC Marks in the United States in connection with the sale of high-quality goods. As a result, the MONTBLANC

Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as an identifier of high-quality goods.

62. Montblanc has carefully monitored and policed the use of the MONTBLANC Marks and has never assigned or licensed the MONTBLANC Marks to any Defendant in this matter.

63. Genuine goods bearing and/or using the MONTBLANC Marks are widely legitimately advertised and promoted by Montblanc, its authorized distributors, and unrelated third parties via the Internet. Visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Montblanc's overall marketing and consumer education efforts. Thus, Montblanc expends significant monetary resources on Internet marketing and consumer education, including SEO and SEM strategies. Those strategies allow Montblanc and its authorized retailers to educate consumers fairly and legitimately about the value associated with the MONTBLANC Marks and the goods sold thereunder.

#### **Van Cleef's Trademark Rights**

64. Van Cleef is the owner of all rights in and to the trademarks identified on Schedule "F" hereto (collectively, the "VAN CLEEF Marks"), which are valid and registered on the Principal Register of the United States Patent and Trademark Office. The VAN CLEEF Marks are used in conjunction with the manufacture and distribution of high-quality goods in the categories identified in Schedule "F." True and correct copies of the Certificates of Registration for the VAN CLEEF Marks are attached hereto as Composite Exhibit "8."

65. The VAN CLEEF Marks have been used in interstate commerce to identify and distinguish Van Cleef's high-quality goods for an extended period of time and serve as a symbol of Van Cleef's quality, reputation and goodwill.



66. Further, Van Cleef expends substantial resources developing, advertising and otherwise promoting the VAN CLEEF Marks. The VAN CLEEF Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

67. Van Cleef and related companies extensively use, advertise and promote the VAN CLEEF Marks in the United States in connection with the sale of high-quality goods. As a result, the VAN CLEEF Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as an identifier of high-quality goods.

68. Van Cleef has carefully monitored and policed the use of the VAN CLEEF Marks and has never assigned or licensed the VAN CLEEF Marks to any Defendant in this matter.

69. Genuine goods bearing and/or using the VAN CLEEF Marks are widely legitimately advertised and promoted by Van Cleef, its authorized distributors, and unrelated third parties via the Internet. Visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Van Cleef's overall marketing and consumer education efforts. Thus, Van Cleef expends significant monetary resources on Internet marketing and consumer education, including SEO and SEM strategies. Those strategies allow Van Cleef and its authorized retailers to educate consumers fairly and legitimately about the value associated with the VAN CLEEF Marks and the goods sold thereunder.

#### **Defendants' Infringing Activities**

70. At all times relevant hereto, Defendants in this action have had full knowledge of Plaintiffs' respective ownership of Plaintiffs' Marks, including their respective, exclusive rights to use and license such intellectual property and the goodwill associated therewith.

71. Defendants are each promoting, advertising, distributing, offering for sale and/or selling goods in interstate commerce bearing and/or using counterfeit and confusingly similar

imitations of one or more of the IWC Marks, PIAGET Marks, ROGER DUBUIS Marks, VACHERON CONSTANTIN Marks, CARTIER Marks, CHLOE Marks, MONTBLANC Marks, and/or VAN CLEEF Marks (the “Counterfeit Goods”) through the fully interactive commercial Internet websites and supporting domains operating under the Subject Domain Names. True and correct copies of the web pages reflecting samples of the Internet websites operating under the Subject Domain Names displaying Plaintiffs’ branded items offered for sale are attached hereto as Composite Exhibit “9.” Specifically, Defendants are using the IWC Marks, PIAGET Marks, ROGER DUBUIS Marks, VACHERON CONSTANTIN Marks, CARTIER Marks, CHLOE Marks, MONTBLANC Marks, and VAN CLEEF Marks (collectively, “Plaintiffs’ Marks”) to initially attract online consumers and drive them to Defendants’ e-commerce store websites operating under the Subject Domain Names. Defendants are each using identical copies of one or more of Plaintiffs’ Marks for different quality goods. Plaintiffs have used their respective Marks extensively and continuously before Defendants began offering counterfeit and confusingly similar imitations of Plaintiffs’ goods.

72. Defendants’ Counterfeit Goods are of a quality substantially different than that of Plaintiffs’ respective, genuine goods. Defendants, are actively using, promoting and otherwise advertising, distributing, selling and/or offering for sale substantial quantities of their Counterfeit Goods with the knowledge and intent that such goods will be mistaken for the genuine quality goods offered for sale by Plaintiffs despite Defendants’ knowledge that they are without authority to use Plaintiffs’ Marks. Defendants’ actions are likely to cause confusion of consumers at the time of initial interest, sale, and in the post-sale setting, who will believe all of Defendants’ goods offered for sale in Defendants’ e-commerce store websites are genuine goods originating from, associated with, and/or approved by Plaintiffs.

73. Defendants advertise their e-commerce store websites, including their Counterfeit Goods offered for sale, to the consuming public via at least their commercial websites operating under the Subject Domain Names. In so doing, Defendants improperly and unlawfully use one or more of Plaintiffs' Marks without Plaintiffs' permission.

74. As part of their overall unlawful scheme, most Defendants are, upon information and belief, concurrently employing and benefiting from substantially similar, and often times coordinated, advertising and SEO and SEM strategies based, in large measure, upon an illegal use of counterfeits and infringements of one or more of Plaintiffs' Marks. Specifically, Defendants are using counterfeits and infringements of Plaintiffs' respective famous names and Plaintiffs' Marks in order to make their websites selling illegal goods appear more relevant and attractive to consumers searching for both Plaintiffs' goods and related goods and information online. By their actions, Defendants are contributing to the creation and maintenance of an illegal marketplace operating in parallel to the legitimate marketplace for Plaintiffs' respective genuine goods. Defendants are causing individual, concurrent and indivisible harm to Plaintiffs and the consuming public by (i) depriving Plaintiffs of their right to fairly compete for space online and within search engine results and reducing the visibility of Plaintiffs' genuine goods on the World Wide Web, (ii) causing an overall degradation of the value of the goodwill associated with Plaintiffs' Marks, (iii) increasing Plaintiffs' overall cost to market their goods and educate consumers about their brands via the Internet, and/or (iv) maintaining an illegal marketplace enterprise, which perpetuates the ability of Defendants and future entrants to that marketplace to confuse consumers and harm Plaintiffs with impunity.

75. Defendants are concurrently conducting and targeting their counterfeiting and infringing activities toward consumers and likely causing unified harm within this district and

elsewhere throughout the United States. As a result, Defendants are defrauding Plaintiffs and the consuming public for Defendants' own benefit.

76. Defendants' use of Plaintiffs' Marks, including the promotion and advertisement, reproduction, distribution, offering for sale, and/or sale of their Counterfeit Goods, is without Plaintiffs' consent or authorization.

77. Defendants are engaging in the above-described illegal counterfeiting and infringing activities knowingly and intentionally or with reckless disregard or willful blindness to Plaintiffs' rights for the purpose of trading on Plaintiffs' respective goodwill and reputations. If Defendants' intentional counterfeiting and infringing activities are not preliminarily and permanently enjoined by this Court, Plaintiffs and the consuming public will continue to be harmed.

78. Defendants' above identified infringing activities are likely to cause confusion, deception and mistake in the minds of consumers before, during, and after the time of purchase. Moreover, Defendants' wrongful conduct is likely to create a false impression and deceive customers into believing there is a connection or association between Plaintiffs' respective genuine goods and Defendants' Counterfeit Goods, which there is not.

79. Further, at least Defendant Numbers 1, 38, 39, 77, and 78 have registered their respective Subject Domain Name(s) using marks that are nearly identical and/or confusingly similar to at least one of Plaintiffs' Marks, (collectively the "Cybersquatted Subject Domain Names").

80. Defendant Numbers 1, 38, 39, 77, and 78 do not have, nor have they ever had, the right or authority to use Plaintiffs' Marks for any purpose. Further, Plaintiffs' Marks have never

been assigned or licensed to be used on any of the websites, including the websites operating under the Cybersquatted Subject Domain Names.

81. Defendant Numbers 1, 38, 39, 77, and 78 have provided false and/or misleading contact information when applying for the registration of the Cybersquatted Subject Domain Names or have intentionally failed to maintain accurate contact information with respect to the registration of the Cybersquatted Subject Domain Names.

82. Defendant Numbers 1, 38, 39, 77, and 78 have never used any of the Cybersquatted Subject Domain Names in connection with a bona fide offering of goods or services.

83. Defendant Numbers 1, 38, 39, 77, and 78 have not made any bona fide non-commercial or fair use of Plaintiffs' Marks on the websites accessible under any of the Cybersquatted Subject Domain Names.

84. Defendant Numbers 1, 38, 39, 77, and 78 have intentionally incorporated Plaintiffs' respective Marks in their Cybersquatted Subject Domain Names to divert consumers looking for Plaintiffs' respective genuine Internet websites to their own Internet websites for commercial gain.

85. Given the visibility of Defendants' various websites and the similarity of their actions, including their SEO and SEM activities, it is clear Defendants are either related, or at a minimum, cannot help but know of each other's existence and the unified harm likely to be caused to Plaintiffs and the overall consumer market in which they operate as a result of Defendants' concurrent actions.

86. Although some Defendants may be physically acting independently, they may properly be deemed to be acting in concert because the combined force of their actions serves to multiply the harm caused to Plaintiffs.

87. Plaintiffs have no adequate remedy at law.

88. Plaintiffs are suffering irreparable injury and have suffered substantial damages as a result of Defendants' unauthorized and wrongful use of Plaintiffs' Marks. If Defendants' counterfeiting and infringing, cybersquatting, and unfairly competitive activities, and their illegal marketplace enterprise are not preliminarily and permanently enjoined by this Court, Plaintiffs and the consuming public will continue to be harmed.

89. The harm and damages sustained by Plaintiffs have been directly and proximately caused by Defendants' wrongful reproduction, use, advertisement, promotion, offers to sell, and sale of their Counterfeit Goods and by the creation, maintenance and very existence of Defendants' illegal marketplace enterprise.

**COUNT I - TRADEMARK COUNTERFEITING AND INFRINGEMENT**  
**PURSUANT TO § 32 OF THE LANHAM ACT (15 U.S.C. § 1114)**

90. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 89 above.

91. This is an action for trademark counterfeiting and infringement against Defendants based on their use of counterfeits, copies, and/or colorable imitations of Plaintiffs' Marks in commerce in connection with the promotion, advertisement, distribution, sale and/or offering for sale of the Counterfeit Goods.

92. Specifically, Defendants are promoting and otherwise advertising, selling, offering for sale and distributing products bearing and/or using counterfeits and infringements of one or more of Plaintiffs' Marks. Defendants are continuously infringing and inducing others to infringe Plaintiffs' Marks by using one or more of them to advertise, promote, offer to sell, and/or sell counterfeit and infringing goods bearing and/or using Plaintiff's Marks.

93. Defendants' concurrent counterfeiting and infringing activities are likely to cause and are causing confusion, mistake and deception among members of the trade and the general consuming public as to the origin and quality of Defendants' Counterfeit Goods.

94. Defendants' unlawful actions have caused and are continuing to cause unquantifiable damage and irreparable harm to Plaintiffs and are unjustly enriching Defendants with profits at Plaintiffs' expense.

95. Defendants' above-described illegal actions constitute counterfeiting and infringement of Plaintiffs' Marks in violation of Plaintiffs' respective rights under § 32 of the Lanham Act, 15 U.S.C. § 1114.

96. Plaintiffs have each suffered and will continue to suffer irreparable injury and damages due to Defendants' above-described activities if Defendants are not preliminarily and permanently enjoined.

**COUNT II - FALSE DESIGNATION OF ORIGIN**  
**PURSUANT TO § 43(a) OF THE LANHAM ACT (15 U.S.C. § 1125(a))**

97. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 89 above.

98. Defendants' Counterfeit Goods bearing and/or using, offered for sale, and sold using copies of one or more of Plaintiffs' Marks have been widely advertised and offered for sale throughout the United States.

99. Defendants' Counterfeit Goods bearing and/or using, offered for sale, and sold using copies of one or more of Plaintiffs' Marks are virtually identical in appearance to Plaintiffs' respective, genuine goods. However, Defendants' Counterfeit Goods are different in quality. Accordingly, Defendants' activities are likely to cause confusion among consumers as to at least the origin or sponsorship of their Counterfeit Goods.

100. Defendants have used in connection with their advertisement, offers for sale, and sale of their Counterfeit Goods, false designations of origin and false descriptions and representations, including words or symbols which tend to falsely describe or represent such goods and have caused such goods to enter into commerce in the United States with full knowledge of the falsity of such designations of origin and such descriptions and representations, all to Plaintiffs' detriment.

101. Defendants have each authorized infringing uses of one or more of Plaintiffs' Marks in Defendants' advertisement and promotion of their counterfeit and infringing branded products. Defendants have also misrepresented to members of the consuming public that the Counterfeit Goods being advertised and sold by them are genuine, non-infringing goods.

102. Additionally, many Defendants are using counterfeits and infringements of one or more of Plaintiffs' Marks to unfairly compete with Plaintiffs and others for space within organic and paid search engine and social media results. Defendants are thereby jointly (i) depriving Plaintiffs of a valuable marketing and educational tool which would otherwise be available to Plaintiffs and (ii) reducing the visibility of Plaintiffs' genuine goods on the World Wide Web and across social media platforms.

103. Defendants' above-described actions are in violation of Section 43(a) of the Lanham Act, 15 U.S.C. §1125(a).

104. Plaintiffs have no adequate remedy at law and have each sustained both individual and indivisible injury and damage caused by Defendants' concurrent conduct. Absent an entry of an injunction by this Court, each Plaintiff will continue to suffer irreparable injury to their respective goodwill and business reputations, as well as monetary damages.



**COUNT III - CLAIM FOR RELIEF FOR CYBERSQUATTING**  
**PURSUANT TO §43(d) OF THE LANHAM ACT (15 U.S.C. §1125(d))**  
(Against Defendant Numbers 1, 38, 39, 77, and 78 only)

105. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 89 above.

106. At all times relevant hereto, Plaintiffs have been and still are the owners of the rights, title and interest in and to their respective trademarks.

107. Defendant Numbers 1, 38, 39, 77, and 78 have acted with the bad faith intent to profit from the IWC Marks and/or CARTIER Marks and the goodwill associated with the Marks by registering and using the Cybersquatted Subject Domain Names.

108. The IWC Marks and CARTIER Marks were distinctive and famous at the time Defendant Numbers 1, 38, 39, 77, and 78 registered the Cybersquatted Subject Domain Names.

109. Defendant Numbers 1, 38, 39, 77, and 78 have no intellectual property rights in or to the IWC Marks and CARTIER Marks.

110. The Cybersquatted Subject Domain Names are identical to, confusingly similar to or dilutive of at least one of the IWC Marks or CARTIER Marks.

111. Defendant Numbers 1, 38, 39, 77, and 78's conduct is done with knowledge and constitutes a willful violation of Plaintiffs' rights in their respective Marks. At a minimum, the conduct of these Defendants constitutes reckless disregard for and willful blindness to Plaintiffs' respective rights.

112. Defendant Numbers 1, 38, 39, 77, and 78's actions constitute cybersquatting in violation of §43(d) of the Lanham Act, 15 U.S.C. §1125(d).

113. Plaintiffs have no adequate remedy at law and have suffered and will continue to suffer irreparable injury and harm due to the above-described activities of Defendant Numbers 1, 38, 39, 77, and 78 if these Defendants are not preliminarily and permanently enjoined.

**COUNT IV - COMMON LAW UNFAIR COMPETITION**

114. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 89 above.

115. This is an action against Defendants based on their (i) promotion, advertisement, distribution, sale, and/or offering for sale of goods bearing and/or using marks which are virtually identical to Plaintiffs' Marks and (ii) creation and maintenance of an illegal, ongoing marketplace enterprise operating in parallel to the legitimate marketplace in which Plaintiffs sell their genuine goods, in violation of Florida's common law of unfair competition.

116. Specifically, Defendants are promoting and otherwise advertising, selling, offering for sale, and distributing goods bearing and/or using counterfeits and infringements of one or more of Plaintiffs' Marks. Defendants are also each using counterfeits and infringements of one or more of Plaintiffs' Marks to unfairly compete with Plaintiffs and others for (i) space in search engine and social media results across an array of search terms and/or (ii) visibility on the World Wide Web.

117. Defendants' infringing activities are likely to cause and are causing confusion, mistake, and deception among consumers as to the origin and quality of Defendants' e-commerce store websites as a whole and all products sold therein by their use of Plaintiffs' Marks.

118. Plaintiffs have no adequate remedy at law and are suffering irreparable injury and damages because of Defendants' actions.

**COUNT V - COMMON LAW TRADEMARK INFRINGEMENT**

119. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 89 above.

120. Plaintiffs are the owners of all common law rights in and to Plaintiffs' Marks.

121. This is an action for common law trademark infringement against Defendants based on their promotion, advertisement, offering for sale, and sale of their Counterfeit Goods bearing and/or using one or more of Plaintiffs' Marks.

122. Specifically, Defendants are promoting and otherwise advertising, distributing, offering for sale, and selling goods bearing and/or using infringements of one or more of Plaintiffs' Marks.

123. Defendants' infringing activities are likely to cause and are causing confusion, mistake and deception among consumers as to the origin and quality of Defendants' Counterfeit Goods bearing and/or using Plaintiffs' Marks.

124. Plaintiffs have no adequate remedy at law and are suffering irreparable injury and damages because of Defendants' actions.

**PRAYER FOR RELIEF**

125. WHEREFORE, Plaintiffs demand judgment on all Counts of this Complaint and an award of equitable relief and monetary relief against Defendants as follows:

a. Entry of temporary, preliminary, and permanent injunctions pursuant to 15 U.S.C. § 1116, 28 U.S.C. § 1651(a), The All Writs Act, and Federal Rule of Civil Procedure 65 enjoining Defendants, their agents, representatives, servants, employees, and all those acting in concert or participation therewith, from manufacturing or causing to be manufactured, importing, advertising or promoting, distributing, selling or offering to sell their Counterfeit Goods; from

infringing, counterfeiting, or diluting Plaintiffs' Marks; from using Plaintiffs' Marks, or any mark or trade dress similar thereto, in connection with the sale of any unauthorized goods; from using any logo, trade name, trademark or trade dress that may be calculated to falsely advertise the services or products of Defendants as being sponsored by, authorized by, endorsed by, or in any way associated with Plaintiffs; from falsely representing themselves as being connected with Plaintiffs, through sponsorship or association, or engaging in any act that is likely to falsely cause members of the trade and/or of the purchasing public to believe any goods or services of Defendants are in any way endorsed by, approved by, and/or associated with Plaintiffs; from using any reproduction, counterfeit, infringement, copy, or colorable imitation of Plaintiffs' Marks in connection with the publicity, promotion, sale, or advertising of any goods sold by Defendants; from affixing, applying, annexing or using in connection with the sale of any goods, a false description or representation, including words or other symbols tending to falsely describe or represent Defendants' goods as being those of Plaintiffs, or in any way endorsed by Plaintiffs and from offering such goods in commerce; from engaging in search engine optimization strategies using colorable imitations of Plaintiffs' respective name or trademarks; and from otherwise unfairly competing with Plaintiffs.

b. Entry of a temporary restraining order, as well as preliminary and permanent injunctions pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, enjoining Defendants and all third parties with actual notice of the injunction from participating in, including providing financial services, technical services or other support to, Defendants in connection with the sale and distribution of non-genuine goods bearing and/or using counterfeits and/or infringements of Plaintiffs' Marks.

c. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and this Court's inherent authority that, upon Plaintiffs' request, those acting in concert or participation with Defendants who have notice of the injunction, as service providers cease hosting, facilitating access to, or providing any supporting service to any and all domain names, including but not limited to the Subject Domain Names, and websites through which Defendants engage in the promotion, offering for sale and/or sale of goods bearing and/or using counterfeits and/or infringements of Plaintiffs' Marks.

d. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, authorizing Plaintiffs to serve the injunction on any e-mail service provider with a request that the service provider permanently suspend the e-mail addresses that are or have been used by Defendants in connection with Defendants' promotion, offering for sale, and/or sale of goods bearing and/or using counterfeits and/or infringements of Plaintiffs' Marks.

e. Entry of an order pursuant to 15 U.S.C. § 1116, 28 U.S.C §1651(a), The All Writs Act, and the Court's inherent authority, that upon Plaintiffs' request, the Defendants and the top level domain (TLD) Registry for each of the Subject Domain Names, and any other domains used by Defendants, or their administrators, including backend registry operators or administrators, place the Subject Domain Names on Registry Hold status for the remainder of the registration period for any such domain name, thus removing them from the TLD zone files which link the Subject Domain Names, and any other domain names being used and/or controlled by Defendants to engage in the business of marketing, offering to sell, and/or selling goods bearing and/or using counterfeits and/or infringements of Plaintiffs' Marks, to the IP addresses where the associated websites are hosted.

f. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, canceling for the life of the current registration or, at Plaintiffs' election, transferring the Subject Domain Names and any other domain names used by Defendants to engage in their counterfeiting and/or infringement of Plaintiffs' Marks at issue to Plaintiffs' control so they may no longer be used for unlawful purposes.

g. Entry of an order pursuant to 15 U.S.C. § 1116 and the Court's inherent authority requiring each Defendant, its agent(s) or assign(s), to assign all rights, title, and interest, to its Subject Domain Name(s) to Plaintiffs and, if within five (5) days of entry of such order any Defendant fails to make such an assignment, the Court order the act to be done by another person appointed by the Court at any non-complying Defendant's expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a).

h. Entry of an order pursuant to 15 U.S.C. § 1116 and the Court's inherent authority requiring each Defendant, its agent(s) or assign(s), to instruct all search engines to permanently delist or deindex the Subject Domain Name(s) and, if within five (5) days of entry of such order any Defendant fails to make such a written instruction, the Court order the act to be done by another person appointed by the Court at any non-complying Defendant's expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a).

i. Entry of an order requiring Defendants to account to and pay Plaintiffs for all profits and damages resulting from Defendants' trademark counterfeiting and infringing activities and that the award to Plaintiffs be trebled, as provided for under 15 U.S.C. §1117, or that Plaintiffs be awarded statutory damages from each Defendant in the amount of two million dollars (\$2,000,000.00) per each counterfeit trademark used and product sold, as provided by 15 U.S.C. §1117(c)(2) of the Lanham Act.

j. Entry of an order requiring Defendant Numbers 1, 38, 39, 77, and 78 to account to and pay Plaintiffs for all profits and damages resulting from those Defendants' cybersquatting activities and that the award to Plaintiffs be trebled, as provided for under 15 U.S.C. §1117, or that Plaintiffs be awarded statutory damages from Defendant Numbers 1, 38, 39, 77, and 78 in the amount of one hundred thousand dollars (\$100,000.00) per cybersquatted domain name used as provided by 15 U.S.C. §1117(d) of the Lanham Act.

k. Entry of an award pursuant to 15 U.S.C. § 1117 (a) and (b) of Plaintiffs' costs and reasonable attorneys' fees and investigative fees associated with bringing this action.

l. Entry of an award of pre-judgment interest on the judgment amount.

m. Entry of an Order requiring Defendants to pay the cost necessary to correct any erroneous impression the consuming public may have received or derived concerning the nature, characteristics, or qualities of Defendants' products, including without limitation, the placement of corrective advertising and providing written notice to the public.

n. Entry of an order for any further relief as the Court may deem just and proper.

DATED: March 8, 2022.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

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Attorneys for Plaintiffs

**SCHEDULE "A"**  
**DEFENDANTS BY NUMBER AND SUBJECT DOMAIN NAME**

<b>Defendant Number</b>	<b>Defendant / Subject Domain Name</b>
1	cartierwatch.to
2	12twe.com
3	24collector.com
4	aaagoodwatch.com
5	aaa-replicawatch.co
6	aaawatches.io
6	choosetopwatches.com
6	copywatchesinuk.co.uk
6	designerreplica.nl
6	nicewatchesshop.com
6	replicawatcheshot.org
6	replicawatchesquality.biz
6	replicawatches-shop.org
6	replicawatchesvip.com
6	replicawatchking.com
6	sharewatches.cz
6	topreplicawatches.xyz
7	affordablewatches.io
8	anyreplicawatches.co.com
9	aomwatches.is
10	appeti.to
11	arreplicawatches.com
12	bestclonewatches.com
13	bestrepwatch.cc
14	besttime24h.com
15	brdreplicas.ru
15	sellingplaza.ru
15	sellplaza.ru
16	buyreplicawatches.io
17	buyreplicawatches.me
17	gmreplica.com
17	goodywatch.me
17	inkskids.com
17	msopbs.com
17	usreplica.me
18	buyukwatches.us





19	buywatch.com.ru
20	cchenwatch.com
21	chinanoobfactory.com
22	chinanoobwatch.io
22	chinanoobwatch.to
23	cityteetime.com
23	replikrolexuhren.de
24	copyluxurywatch.com
24	copywatchstyle.com
25	copywatchalike.co
26	copywatches2019.com
27	d4ll.co
28	designersdiscreet.ru
29	drdelux.com
30	falsiorologi.it
31	fbestwatch.com
31	replicawatchesale.com
31	replicawatchesday.com
31	replicawatchesi.com
31	soreplicawatches.com
31	ybestwatch.com
32	firstwatchclone.co
33	fomshop.ml
34	gdwatchclone.ru
35	geektime.cc
36	hellorolexdealer.me
37	idolproducts.com
38	iwcshop.is
39	iwcwatch.to
40	jewelsdo.com
41	karanfrank.com
42	karinakouture.ru
43	luxejewelryaaa.com
44	luxuwatchesunder.ru
45	manualcelavive.com
46	mirotime.co
47	mowatch.org
48	newwatchesale.com
49	nicefakewatches.com
50	noobfwatch.com

51	noobwatch.cc
52	ots-watches.co
53	oursreplica.com
53	ukreplicawatches.net
54	perfect-arw.com
55	perfectchrono.ru
56	perfectwatch.to
57	pgwatch.is
58	pophotwatches.com
59	pulp.tc
60	qualitywatchesdepot.to
60	swisswatcheshq.com
61	repbargains.com
62	replicamagic1.to
63	replicawatch.pro
64	replicawatch.su
65	replicawatchprice.com
65	swissclonewatch.com
66	replicawatchesindubai.com
67	replicawatchesstore.to
68	shopreplica.eu
69	shops1t.ml
69	svipshop1s.ga
70	superclone.watch
71	top10replicawatches.com
72	uboatmens.com
73	ukwatch.cz
74	ureplicawatch.com
75	utopiawatch.com
76	vewshop.com
77	watchescartier.to
78	watchesiwc.to
79	watcheskeep.com
80	watchesyo.co
81	watchisclock.com
82	watchreplica.is
83	wonkaluxury.com
84	wristclone.ru
85	yepbrand.ru

**SCHEDULE "B"**  
**PLAINTIFF RICHEMONT INTERNATIONAL S.A.'S**  
**FEDERALLY REGISTERED TRADEMARKS**


**(1) IWC Schaffhausen Trademarks**

<b>Trademark</b>	<b>Registration Number</b>	<b>Registration Date</b>	<b>Class / Goods</b>
IWC	1,205,403	August 17, 1982	IC 014 - Watches
PORTOFINO	1,846,680	July 26, 1994	IC 014 – Watches
	2,479,518	August 21, 2001	IC 014 – Watches
	4,270,382	January 8, 2013	IC 014 - Watches, chronometers, clocks; straps for wristwatches, boxes of precious metal for watches and all the aforementioned goods from Switzerland
IWC	4,322,600	April 23, 2013	IC 014 - Watches, chronometers, clocks, watch bands, boxes of precious metal for watches
PORTUGIESER	4,412,785	October 8, 2013	IC 014 - Watches, chronometers, clocks, watch straps, watch bracelets, and boxes of precious metals for watches



(2) Piaget Trademarks

Trademark	Registration Number	Registration Date	Classes/Goods
<b>PIAGET</b>	0,679,984	June 9, 1959	IC 014 - Complete Watches
PIAGET	0,742,354	December 18, 1962	IC 014 - Watches, Watch Parts and Watch Movements

**(3) Roger Dubuis Trademarks**


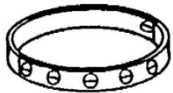
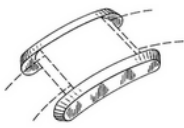


<b>Registered Trademark</b>	<b>Registration Number</b>	<b>Registration Date</b>	<b>Classes/Goods</b>
<b>ROGER DUBUIS</b>	2,345,742	April 25, 2000	IC 014 - Watches, watch bands
	4,204,082	September 11, 2012	IC 014 - Watches, chronometers, watch bands, boxes of precious metal for watches
<b>EXCALIBUR</b>	5,201,114	May 09, 2017	IC 014 - Watches; timepieces; horological instruments; movements for timepieces, namely, watches; watch straps; watch cases

**(4) Vacheron Constantin Trademarks**




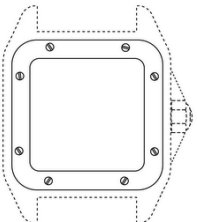
<b>Registered Trademark</b>	<b>Registration Number</b>	<b>Registration Date</b>	<b>Classes/Goods</b>
 <b>VACHERON CONSTANTIN</b>	3,114,414	July 11, 2006	IC 014 - Cuff links; watches, chronometers, clocks, watchstraps, cases of precious metal for watches and jewellery
	4,564,316	July 8, 2014	IC 014 - Watches and chronometers
<b>VACHERON CONSTANTIN</b>	5,630,166	December 18, 2018	IC 014 - Jewelry; Cuff links; Tie clips; Jewelry in the nature of rings, bracelets, earrings, necklaces and brooches; Timepieces in the nature of clocks; Dials for clock and watch making; Key rings of precious metal; Timepieces and chronometric instruments; Watches; Chronometers; Cases adapted for holding watches; Movements for timepieces in the nature of clocks and watches; Alarm clocks; Watch bands; Boxes of precious metal

**SCHEDULE "C"**  
**PLAINTIFF CARTIER INTERNATIONAL A.G.'S**  
**FEDERALLY REGISTERED TRADEMARKS**

<b>Registered Trademark</b>	<b>Registration Number</b>	<b>Registration Date</b>	<b>Classes/Goods</b>
CARTIER	0,411,239	January 9, 1945	IC 014 - Precious-Metal Ware-namely, the following articles made, in whole or in part, of Precious Metals or Plated With the Same; Jewel Boxes, Fobs, Bracelets, Watch Bracelets And Buckles Therefore, not including Watches, Cuff Links, Brooches, Earrings, Eyeglass Cases, Cigarette Lighters, Ash Trays, Envelope Openers, Wallets, Money Clips, Perfume Bottles, Desk Sets, Handbags, Key Chains, Finger Rings.
<i>Cartier</i>	0,411,240	January 9, 1945	IC 014 - Articles of Jewelry for Personal Wear and for Precious-Metal Ware-Namely, the Following Articles Made, in Whole or in Part, of Precious Metals or Plated with the Same-- viz, Jewel Boxes, Fobs, Bracelets, Watch Bracelets and Buckles Therefor, Not Including Watches, Cuff Links, Brooches, Earrings, Eyeglass Cases, Cigarette Lighters, Ash Trays, Envelope Openers, Wallets, Money Clips, Perfume Bottles, Desk Sets, Handbags, Key Chains, Finger Rings
<i>Cartier</i>	0,411,975	February 13, 1945	IC 014 - Watches and Clocks and Wrist Watches with Wrist Straps and Bracelets Attached for Securing the Same on the Wrist of the Wearer, and Traveling Clocks and Watches with Covers of Leather, Fabric and the Like for Protecting Them While Traveling
CARTIER	0,759,201	October 29, 1963	IC 014 - Watches and Clocks
LOVE BRACELET	1,005,286	February 25, 1975	IC 014 - Jewelry-Namely, Bracelets

	<p>1,114,482</p>	<p>March 6, 1979</p>	<p>IC 014 - Articles of jewelry, watches</p>
	<p>1,372,423</p>	<p>November 26, 1985</p>	<p>IC 014 – Bracelets</p>
	<p>2,322,769</p>	<p>February 29, 2000</p>	<p>IC 014 – Watches</p>
	<p>3,162,410</p>	<p>October 24, 2006</p>	<p>IC 014 - Jewelry, Namely, Bracelets, Watches, Rings, Charms, Earrings</p>
<p>BALLON BLEU</p>	<p>3,476,888</p>	<p>July 29, 2008</p>	<p>IC 014 - Watches, Chronometers, Clocks</p>
<p>LOVE</p>	<p>3,637,776</p>	<p>June 16, 2009</p>	<p>IC 014 - Goods Of Precious Metals And Coated Therewith, Namely, Cuff-Links, Rings, Bracelets, Earrings, Necklaces</p>
	<p>3,776,794</p>	<p>April 20, 2010</p>	<p>IC 014 - Jewelry, Namely, Rings, Bracelets, Charms, Earrings, Made Of Precious Metals</p>
<p><i>Cartier</i></p>	<p>4,178,047</p>	<p>July 24, 2012</p>	<p>IC 014 - Jewelry and watches</p>




	<p>4,197,020</p>	<p>August 28, 2012</p>	<p>IC 014 - Jewelry and watches</p>
	<p>4,483,522</p>	<p>February 18, 2014</p>	<p>IC 014 – Watches</p>
	<p>4,487,142</p>	<p>November 27, 2012</p>	<p>IC 014 – Watches</p>
	<p>4,608,158</p>	<p>September 23, 2014</p>	<p>IC 014 – Watches</p>



**SCHEDULE "D"**  
**PLAINTIFF CHLOE S.A.S.'S**  
**FEDERALLY REGISTERED TRADEMARKS**

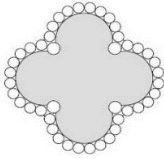

<b>Registered Trademark</b>	<b>Registration Number</b>	<b>Registration Date</b>	<b>Classes/Goods</b>
<b>Chloé</b>	0,950,843	January 16, 1973	IC 010, 025, 026 - Ladies' articles of clothing for outerwear-namely, frocks, dresses, coats, costumes, suits, skirts, blouses, vests and pantsuits; vests, and ladies' shoes
CHLOE	1,491,810	June 14, 1988	IC 018 - Handbags, Purses

**SCHEDULE "E"**  
**PLAINTIFF MONTBLANC-SIMPLO GMBH'S**  
**FEDERALLY REGISTERED TRADEMARKS**

<b>Registered Trademark</b>	<b>Registration Number</b>	<b>Registration Date</b>	<b>Classes/Goods</b>
	1,878,584	February 14, 1995	IC 014 - Jewelry, watches and timepieces  IC 018 - Purses, handbags, small leather articles and accessories, namely wallets and billfolds, and luggage
MONTBLANC	1,884,842	March 21, 1995	IC 014 - Jewelry, watches and timepieces  IC 018 - Purses, handbags, small leather articles and accessories, namely wallets and billfolds, and luggage
TIMEWALKER	2,775,693	October 21, 2003	IC 014 - Wrist watches.

**SCHEDULE "F"**  
**PLAINTIFF VAN CLEEF & ARPELS SA'S**  
**FEDERALLY REGISTERED TRADEMARKS**

<b>Registered Trademark</b>	<b>Registration Number</b>	<b>Registration Date</b>	<b>Classes/Goods</b>
Van Cleef & Arpels	1,415,794	November 4, 1986	IC 014 - Jewelry and Watches
<b>VCA</b>	1,584,572	February 27, 1990	IC 014 – Jewelry
	2,692,672	March 4, 2003	IC 014 – Jewelry; Watches
<b>ALHAMBRA</b>	2,751,878	August 19, 2003	IC 014 - Precious Metal And Their Alloys And Products Made Thereof Or Coated Therewith Not Included In Other Classes, Namely, Jewelry, Horological And Chronometric Instruments, Namely, Watches And Watch Bracelets And Necklaces, Jewelry Chains Of Precious Metal, Earrings, Jewelry Rings, Pendants, Ankle Bracelets, Cuff Links, Studs Made Of Precious Metal
VAN CLEEF & ARPELS	2,936,247	March 29, 2005	IC 014 - Items Made Of Precious Metal, Namely, Rings, Bracelets, Earrings, Necklaces, Pendants, Charms, Brooches, Clips, Hairclips, Jewelry Boxes, Jewelry Cases, Watch Bracelets And Buckles; Jewelry, Watches And Clocks
<b>ALHAMBRA</b>	3,489,019	August 19, 2008	IC 014 - Jewelry; Clock And Watch Making, Namely, Watches, Watch Bracelets
	4,326,883	April 30, 2013	IC 014 – Jewelry

	4,653,258	December 9, 2014	IC 014 - Jewelry
	4,763,030	June 30, 2015	IC 014 - Jewelry; Rings; Pendants; Earrings; Necklaces; Bracelets