

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 25-20335-CIV-BLOOM**

RICHEMONT INTERNATIONAL SA,

Plaintiff,

vs.

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

Defendants.

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

Plaintiff, Richemont International SA ("Plaintiff"), hereby does apply, on an *ex parte* basis, for entry of a temporary restraining order and an order restraining transfer of assets, and upon expiration of the temporary restraining order, a preliminary injunction against Defendants, the Individuals, Business Entities, and Unincorporated Associations Identified on Schedule "A" hereto ("Defendants") pursuant to 15 U.S.C. § 1116, Fed. R. Civ. P. 65, The All Writs Act, 28 U.S.C. § 1651(a), and this Court's inherent authority. In support thereof, Plaintiff 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 and confusingly similar imitations of one or more of Plaintiff'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 (the "E-commerce Store Names"). Plaintiff obtained evidence demonstrating that Defendants (a) are engaged in the advertising, offering for sale, and sale of counterfeit and infringing versions of Plaintiff's branded goods; and (b) accomplish their sales of counterfeit and infringing goods via the Internet using, at least, e-commerce stores operating under the E-commerce Store Names. Based on the evidence, Plaintiff's Complaint alleges claims for trademark

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

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

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

## **II. STATEMENT OF FACTS**

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

Plaintiff is the owner of all rights in and to the federally registered trademarks identified in Paragraph 6 ("Plaintiff's Marks") of the Declaration of Emma-Jane Tritton in Support of Plaintiff's *Ex Parte* Application for Entry of Temporary Restraining Order ("Tritton Decl."), which are used in connection with the manufacture and distribution of high-quality goods in the categories identified therein. (See Tritton Decl. ¶¶ 5-7, filed herewith; see also United States Trademark Registrations for the Plaintiff's Marks at issue ["Plaintiff's Trademark Registrations"] attached as Comp. Ex. 1 to the Complaint, ECF No. [1-2], incorporated herein by reference.) Plaintiff's Marks are symbols of Plaintiff's quality, reputation, and goodwill and have never been abandoned. (Tritton Decl. ¶ 9.) Moreover, Plaintiff expends substantial resources developing, advertising, and

otherwise promoting its trademarks. (Tritton Decl. ¶¶ 7-8.) Accordingly, Plaintiff's Marks qualify as famous marks as the term is used in 15 U.S.C. § 1125(c)(1).

Furthermore, Plaintiff extensively uses, advertises, and promotes Plaintiff's Marks in the United States and has carefully monitored and policed the use of the Plaintiff's Marks. (Tritton Decl. ¶¶ 8-9.) As a result of Plaintiff's efforts, Plaintiff's Marks have acquired fame in the consumer market. (*Id.*) Plaintiff's Marks have come to symbolize the enormous goodwill of Plaintiff's genuine products throughout the United States. (*Id.*) At all times relevant hereto, Defendants have been aware of Plaintiff's (a) ownership of Plaintiff's Marks; (b) exclusive rights to use and license such Marks; and (c) substantial goodwill embodied in, and favorable recognition for, Plaintiff's Marks.

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

Defendants do not have, nor have they ever had, the right or authority to use Plaintiff's Marks for any purpose. (Tritton Decl. ¶¶ 11, 14-15.) However, 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 bearing and/or using counterfeit and infringing trademarks that are exact copies of one or more of Plaintiff's Marks without authorization ("Defendants' Goods"). (Tritton Decl. ¶¶ 11-15; Declaration of Stephen M. Gaffigan in Support of Plaintiff's Application for Temporary Restraining Order ["Gaffigan Decl."] ¶ 2, filed herewith; Declaration of Kathleen Burns in Support of Plaintiff's Application for Temporary Restraining Order ["Burns Decl."] ¶ 4, filed herewith; see also relevant web page captures from Defendants' e-commerce stores operating under the E-commerce Store Names displaying Plaintiff's branded items offered for sale ["Defendants' E-commerce Store Names"] attached as Comp. Ex. 1 to the Burns Decl.)

Given Defendants' slavish copying of Plaintiff's 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 Plaintiff's Marks, Defendants have created a false association between their counterfeit and infringing goods and e-commerce stores, and Plaintiff. Such false association is in violation of 15 U.S.C. § 1125(a) and is causing and will continue to cause Plaintiff irreparable injury and damage. (See Tritton Decl. ¶¶ 10, 26.)

As part of its ongoing investigation regarding the sale of counterfeit and infringing products, Plaintiff's counsel retained Invisible Inc ("Invisible"), a licensed private investigative

firm, to investigate the promotion and sale of counterfeit and infringing versions of Plaintiff's branded products by Defendants and to obtain the available payment account data for receipt of funds paid to Defendants for the sale of counterfeit and infringing versions of Plaintiff's branded products through the E-commerce Store Names. (Tritton Decl. ¶ 12; Gaffigan Decl. ¶ 2; Burns Decl. ¶ 3.) Invisible accessed the Internet based e-commerce stores operating under the E-commerce Store Names,<sup>1</sup> placed an order from each Defendant for the purchase of a product, all bearing and/or using counterfeits and infringements of, at least, one of Plaintiff's Marks at issue in this action and requested each product be shipped to an address in the Southern District of Florida.<sup>2</sup> (Burns Decl. ¶ 4 and Comp. Ex. 1 thereto.) Each order was processed entirely online, and following the submission of the orders, Invisible received information for finalizing payment<sup>3</sup> for the products ordered using Defendants' respective financial account information, as identified on Schedule "A" hereto. (See id.) At the conclusion of the process, the detailed web page captures and images of the various branded products offered for sale and ordered via Defendants' E-commerce Store Names were sent to Plaintiff's representative for inspection. (Id.; Tritton Decl. ¶¶ 4, 11-15; Gaffigan Decl. ¶ 2.)

Under the direct supervision of Plaintiff's representative, Emma-Jane Tritton, Corsearch Inc.'s reviewing representatives reviewed the various products bearing and/or using Plaintiff's Marks identified and captured by Invisible by reviewing the Internet based e-commerce stores operating under Defendants' E-commerce Store Names, and/or the detailed web page captures thereof, together with photographs of certain received goods, and determined the products were non-genuine, unauthorized versions of Plaintiff's products. (Tritton Decl. ¶¶ 4, 11-15.)

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<sup>1</sup> Certain Defendants operate their E-commerce Store Names in tandem with electronic communication via private messaging applications and/or services to complete their offer and sale of counterfeit and infringing versions of Plaintiff's branded products. Additional means of contact provided by Defendants, including e-mail addresses and WhatsApp phone numbers are also identified on Schedule "A" hereto. (See Burns Decl. ¶ 4, n.1.)

<sup>2</sup> During the checkout process from Defendant 13's E-commerce Store Names, cnxsces.store and cysenwk.shop, Invisible's firm was automatically redirected to Defendant 13's E-commerce Store Name, yewugu.store. (See Burns Decl. ¶ 4, n.2.)

<sup>3</sup> Invisible did not transmit the funds to finalize the sale for orders from many of the Defendants so as to avoid adding additional funds to Defendants' coffers. (See Gaffigan Decl. ¶ 2, n.1; Burns Decl. ¶ 4, n.3.)

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

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

Defendants are all using counterfeits and infringements of Plaintiff’s famous name and trademarks to make their e-commerce stores appear more relevant and attractive to consumers shopping for Plaintiff’s genuine branded products online. While each Defendant causes direct individual harm to Plaintiff, the combined effect of Defendants’ unlawful activities functions as a force multiplier to cause Plaintiff a single indivisible harm. (See Tritton Decl. ¶¶ 19, 23-25.) 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, Plaintiff’s genuine branded goods are widely legitimately advertised, promoted, offered for sale, and discussed by Plaintiff, its authorized distributors, and unrelated third parties via the Internet. (See Tritton Decl. ¶ 16.) Visibility on the Internet, particularly via

search engines and social media platforms, is important to Plaintiff's overall marketing and consumer education efforts. (*Id.* at ¶ 17.) Plaintiff expends significant resources on Internet marketing and consumer education regarding its products, including search engine optimization, search engine marketing, and social media strategies, which allows Plaintiff and others to educate consumers fairly and legitimately about the value associated with Plaintiff's brand and the goods sold thereunder. (*Id.*; see also Compl. ¶ 21.)

Counterfeiters like Defendants embrace similar marketing strategies to Plaintiff and are concurrently leveraging it to cause greater and more significant harm to Plaintiff. The combination of all Defendants engaging in the same exact illegal activity for the same purpose over the same time span causes Plaintiff irreparable harm in a way that the individual actions occurring alone might not. See, e.g., Bose Corp., 334 F.R.D. at 517 (“[Plaintiff] does not perceive any one counterfeiter to be the problem. Each injury by itself is relatively inconsequential to [Plaintiff]. Rather, it is the injuries in the aggregate . . . that is harmful and from which [Plaintiff] seeks shelter.”) Defendants are jointly and concertedly harming Plaintiff's marketing efforts on the Internet by blocking and consistently increasing the cost of online visibility for Plaintiff's legitimate, authorized e-commerce website. (See Tritton Decl. ¶¶ 19, 23-25.) Moreover, the combination of Defendants' unlawful activities increases Plaintiff's costs 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 Plaintiff and consumers. (See Tritton Decl. ¶¶ 17-25; Compl. ¶¶ 25-26; 31-32.) 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 benefiting from advertising and market targeting strategies based upon an unlawful use of Plaintiff's Marks online, Defendants are jointly obliterating the otherwise open and available marketplace space in which Plaintiff has the right to fairly market its goods and associated message. Through their combined concurrent actions, Defendants are causing individual, concurrent, and indivisible harm to Plaintiff and the consuming

public by (i) depriving Plaintiff and other third parties of the ability to fairly compete for space within marketing results, (ii) causing an overall degradation of the value of the goodwill associated with Plaintiff's Marks by viewing inferior products in either the pre or post sale setting, and/or, (iii) increasing Plaintiff's overall cost to market its goods and educate consumers about its brand via the Internet. (See Tritton Decl. ¶¶ 24-25.) See also Bose Corp., 334 F.R.D. at 517 ("From the plaintiff's perspective . . . it is irrelevant whether the swarm is intentionally coordinated or simply a product of market forces enabled by the internet.")

Meaningful space on the World Wide Web, including marketplace and social media advertisement space, is akin to real estate – there is only so much of it available. E-commerce operators, including Plaintiff and Defendants, spend significant resources incorporating concepts and popular search terms, such as Plaintiff's Marks, into their on-site and off-site content and advertising to promote visibility on the World Wide Web. Plaintiff is doing so through the use of its trademarks in which it has made a substantial economic investment, and Defendants are doing so through subterfuge and unlawful use of Plaintiff's Marks. Each Defendant is helping to create and maintain the overall illicit marketplace where they market and sell their respective goods and confuse consumers.

Plaintiff, 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 Plaintiff rights to fairly compete for visibility on the World Wide Web.

### **III. ARGUMENT**

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

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

Defendants fraudulently promote, advertise, offer for sale, and sell goods bearing and/or using counterfeits and infringements of Plaintiff's Marks via their e-commerce stores using the E-commerce Store Names. By their actions, Defendants are creating a false association in the minds

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

Absent a temporary restraining order without notice, Defendants can and, based upon Plaintiff's counsel's experience, will likely significantly alter the status quo before the Court can determine the parties' respective rights. The e-commerce stores at issue are under Defendants' complete control. As such, Defendants can change the ownership or modify e-commerce store and private messaging account data and content, change payment accounts, redirect consumer traffic to other seller names, and transfer assets and ownership of the E-commerce Store Names. (Gaffigan 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 secrete the funds sought to be restrained if they obtain advance notice of Plaintiff's Application for Temporary Restraining Order and thereby thwart the Court's ability to grant meaningful relief and can completely erase the status quo. (*Id.*) As Defendants engage in unlawful counterfeiting and infringing activities, Plaintiff has no reason to believe Defendants will make their assets available for recovery pursuant to an accounting of profits or other equitable remedies or will adhere to the authority of this Court any more than they have adhered to federal trademark law. (*Id.*)

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"); see also Chanel, Inc. v. Individuals, No. 24-cv-22336-BLOOM/Elfenbein, 2024 U.S. Dist. LEXIS 158234 (S.D. Fla. June 24, 2024) (order granting plaintiffs a temporary restraining order and restraining defendants' assets and defendants' related assets). This Court should prevent

an injustice from occurring by issuing an *ex parte* temporary restraining order which precludes Defendants from continuing to display their infringing content or modifying or deleting any related content or data 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, Case No. 10-cv-80734, 2010 WL 3293346, at \*3 (S.D. Fla. June 29, 2010) (citing Siegel v. LePore, 120 F. Supp. 2d 1041 (S.D. Fla. 2000) aff'd 234 F.3d 1163 (11th Cir. 2000)). In order to obtain a temporary restraining order or a preliminary injunction, a party must establish (1) a substantial likelihood of success on the merits; (2) that irreparable injury will be suffered if the relief is not granted; (3) that the threatened injury outweighs the harm the relief would inflict on the non-movant; and (4) that entry of the relief would serve the public interest. Schiavo ex rel. Schindler v. Schiavo, 403 F.3d 1223, 1225-26 (11th Cir. 2005); see also Levi Strauss & Co. v. Sunrise Int'l Trading Inc., 51 F.3d 982, 985 (11th Cir. 1995) (affirming entry of preliminary injunction and freezing of assets). Plaintiff's evidence establishes all of 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 (2025). Plaintiff must demonstrate (1) ownership of the trademarks at issue; (2) Defendants' use of the trademarks is without Plaintiff'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). Plaintiff's evidence satisfies these requirements.

The first two elements of Plaintiff's trademark counterfeiting and infringement claims are easily met. Plaintiff's Marks are owned by the Plaintiff and registered on the Principal Register of the United States Patent and Trademark Office. All of the trademarks at issue herein have become "incontestable" under 15 U.S.C. §§ 1058 and 1065. (See Tritton Decl. ¶ 6; see also Plaintiff's Trademark Registrations, attached as Comp. Ex. 1 to the Compl.) See Ocean Bio-Chem, Inc. v.

Turner Network Television, Inc., 741 F. Supp. 1546, 1554 (S.D. Fla. 1990) (“Incontestable status provides conclusive evidence of the registrant’s exclusive right to use the registered mark, subject to §§ 15 and 33(b) of the Lanham Act.”). Moreover, Defendants have never had the right or authority to use Plaintiff’s Marks. (Tritton Decl. ¶¶ 11, 14-15.)

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

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

A trademark’s strength is determined by viewing the mark in its entirety as it appears in the marketplace. See Lone Star Steakhouse and Saloon, Inc. v. Longhorn Steaks, Inc., 106 F.3d 355, 362 (11th Cir. 1997). The spectrum of protectability and strength for trademarks is divided into four primary types of designations: (1) coined, fanciful or arbitrary; (2) suggestive; (3) descriptive; and (4) generic. See Two Pesos, Inc. v. Taco Cabana, Inc., 505 U.S. 763, 768, 112 S. Ct. 2753, 120 L.Ed.2d 615 (1992). Arbitrary or fanciful marks are the strongest and deemed inherently distinctive and entitled to protection. (See id.) It cannot be seriously disputed that Plaintiff’s Marks are strong, arbitrary, and fanciful marks. (See Tritton Decl. ¶ 6; see also Plaintiff’s Trademark Registrations, Comp. Ex. 1 to the Compl.)

Plaintiff’s Marks have also acquired secondary meaning. Plaintiff and its related companies expend substantial resources in developing, advertising, and promoting Plaintiff’s Marks. (See Tritton Decl. ¶¶ 7-9.) Plaintiff’s Marks enjoy widespread recognition and are prominent in the minds of consumers. Indeed, Plaintiff’s Marks are widely recognized trademarks in the United States. (Id.)

#### **(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 Plaintiff’s Marks. (Compare Plaintiff’s Trademark Registrations

[Comp. Ex. 1 to the Compl.] with Defendants’ E-commerce Store Names [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 Plaintiff sells. (Tritton Decl. ¶¶ 5-8, 11-15; see generally Defendants’ E-commerce Store Names, attached as Comp. Ex. 1 to the Burns Decl.) Because they bear and/or use counterfeits of Plaintiff’s Marks, Defendants’ Goods appear virtually identical to Plaintiff’s genuine products in the consumer market. Standing alone, this similarity can be held sufficient to establish a likelihood of confusion. See John H. Harland Co., 711 F.2d at 976.

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

Convergent marketing channels increase the likelihood of confusion. See Turner Greenberg Assocs., 320 F. Supp. 2d at 1332. Both Plaintiff 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 Tritton Decl. ¶¶ 8, 11, 16; Burns Decl. ¶ 4.) Thus, the conditions of purchase for both parties are unmistakably identical. Moreover, both target the same general U.S. consumers, and as such, Plaintiff is directly competing with Defendants’ products.

**(6) Defendants’ Intent.**

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

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

Actual confusion is unnecessary to establish infringement since the test is likelihood of confusion. See Frehling Enters. v. Int’l Select Group, Inc., 192 F.3d 1330, 1340 (11th Cir. 1999).

In this case, however, it is reasonable to infer actual confusion exists in the marketplace based upon the circumstantial evidence available. Defendants are advertising, offering to sell and selling counterfeit goods identical in appearance to those sold by Plaintiff. (Tritton Decl. ¶ 6; 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 Plaintiff's Marks, which undeniably creates the impression they are viewing genuine goods sold or authorized by Plaintiff. 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 Plaintiff's favor. Plaintiff 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, 505 U.S. at 763. Additionally, whether a defendant's use of a plaintiff's trademarks creates a likelihood of confusion between the plaintiff's and the defendant's products is also the determining factor in the analysis of unfair competition under the common law of Florida and Florida common law trademark infringement. See Planetary Motion, Inc. v. Techsplosion, Inc., 261 F.3d 1188, 1193 n.4 (11th Cir. 2001) ("Courts may use an analysis of federal infringement claims as a 'measuring stick' in evaluating the merits of state law claims."); PetMed Express, Inc. v. MedPets.com, Inc., 336 F. Supp. 2d 1213, 1217-18 (S.D. Fla. 2004). Whether the violation is called infringement, unfair competition, or false designation of origin, the test is identical – is there a "likelihood of confusion?" Two Pesos, 505 U.S. at 763. Thus, because Plaintiff has established the merits of its trademark counterfeiting and infringement claims, a likelihood of success is also shown as to Plaintiff's claim for false designation of origin, as well as its common law unfair competition and trademark infringement claims.

## **2. Plaintiff is Suffering Irreparable Injury.**

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

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

Plaintiff has expended resources to develop the quality, reputation, and goodwill associated with Plaintiff’s Marks. (Tritton Decl. ¶¶ 7-8.) Should Defendants be permitted to continue their trade in counterfeit goods, Plaintiff will suffer losses and irreparable injury and damage to its reputation. (See id. at ¶¶ 10, 26.) However, Defendants will suffer no legitimate hardship in the event a temporary restraining order is issued, because Defendants have no right to engage in their present counterfeiting and infringing activities.

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

Defendants are engaged in unlawful activities and are directly defrauding consumers by palming off Defendants’ Goods as Plaintiff’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.**

Plaintiff requests an order requiring Defendants to immediately cease all use of Plaintiff's 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 Plaintiff'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 Plaintiff's Marks. This Court, and other courts within this district, have authorized immediate injunctive relief in similar cases involving the unauthorized use of trademarks.<sup>4</sup>

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

In addition to an order temporarily restraining Defendants' practices, the Court should further enter an order limiting the transfer of Defendants' unlawfully gained assets. Plaintiff has demonstrated above that it will likely succeed on the merits of its claims. As such, under 15 U.S.C. § 1117, Plaintiff will be entitled to an accounting and payment of the profits earned by Defendants throughout the course of their counterfeiting and infringing scheme. 15 U.S.C. § 1117(a) (2025). Due to the deceptive nature of the counterfeiting business, and Defendants' deliberate violations

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<sup>4</sup> See Chanel, Inc. v. Individuals, No. 24-cv-22336-BLOOM/Elfenbein, 2024 U.S. Dist. LEXIS 158234 (S.D. Fla. June 24, 2024) (Order Granting *Ex Parte* Application for Entry of Temporary Restraining Order); adidas AG v. Individuals, Bus. Entities, & Unincorporated Ass'ns Identified on Schedule "A", No. 23-62188-CIV-BLOOM, 2023 U.S. Dist. LEXIS 214777 (S.D. Fla. Nov. 22, 2023) (same); Richemont Int'l SA v. Individuals, Bus. Entities & Unincorporated Ass'ns, No. 22-cv-61064-BLOOM, 2022 U.S. Dist. Lexis 104707 (S.D. Fla. June 8, 2022) (same); Yeti Coolers, LLC v. Individuals, Business Entities & Unincorporated Ass'ns, No. 21-cv-62008-BLOOM, 2021 U.S. Dist. LEXIS 197592 (S.D. Fla. Sept. 28, 2021) (same); S.A.S. Jean Cassegrain, et al. v. Individuals, Bus. Entities, & Unincorporated Ass'ns, Case No. 25-cv-20181-BLOOM (S.D. Fla. Jan. 15, 2025) (same); Burberry Limited, et al. v. Individuals, Bus. Entities, & Unincorporated Ass'ns, Case No. 24-cv-24954-Bloom (S.D. Fla. Dec. 20, 2024) (same); Chanel, Inc. v. Individuals, Bus. Entities, & Unincorporated Ass'ns, Case No. 24-cv-24928-BLOOM (S.D. Fla. Dec. 17, 2024) (same). See also 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); Chanel, Inc. v. Individuals, No. 1:24-cv-60970-LEIBOWITZ, 2024 U.S. Dist. LEXIS 188588 (S.D. Fla. July 25, 2024) (same); Tiffany (NJ) LLC v. Individuals, Bus. Entities, & Unincorporated Ass'ns Identified on Schedule "A", No. 24-60442-CIV-DIMITROULEAS, 2024 U.S. Dist. Lexis 91128, 2024 WL 2139348 (S.D. Fla. Mar. 22, 2024) (same).

of federal trademark laws, Plaintiff 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. (See Gaffigan Decl. ¶ 4.) See Int'l Star Class Yacht Racing Ass'n v. Tommy Hilfiger USA, Inc., 80 F.3d 749 (2d Cir. 1996); see also SEC v. ETS Payphones, 408 F.3d 727, 735 (11th Cir. 2005) (finding it proper to all of the defendant's assets, because it was necessary to preserve sufficient funds for the potential disgorgement in the case).

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

In light of the illicit nature of the counterfeiting business and the ability of counterfeiters to practically eliminate their evidentiary trails by conducting their business entirely over the Internet, courts in the Eleventh Circuit, among others, have particularly noted the significance of such asset restraints in cases involving counterfeiting defendants. See, e.g. Levi Strauss & Co. v. Sunrise Int'l Trading, 51 F.3d 982 (11th Cir. 1995); Reebok Int'l Ltd. v. Marnatech Enter., 737 F. Supp. 1515 (S.D. Cal. 1989), aff'd, 970 F.2d 552 (9th Cir. 1992). In Levi Strauss, the Eleventh Circuit upheld an order granting an asset restraint against an alleged counterfeiter where the complaint included a request for a permanent injunction and the equitable remedy of disgorgement of the alleged counterfeiter's profits under 15 U.S.C. § 1117. Levi Strauss, 51 F.3d at 987. Distinguishing Levi Strauss from two earlier cases not involving Lanham Act claims, the Court emphasized the necessity of the restraint holding that a “request for equitable relief invokes the district court's inherent equitable powers to order preliminary relief, including an asset freeze, in order to assure the availability of permanent relief.” Id. citing Federal Trade Commission v. United States Oil and Gas Corp., 748 F.2d 1431, 1433-34 (11th Cir. 1984) (district court may exercise its full range of equitable powers, including a preliminary asset restraint, to ensure that permanent

equitable relief will be possible). Indeed, courts may issue broad asset restraints to preserve the availability of permanent relief, including assets that are not directly traceable to the fraudulent activity that serves as a basis for the equitable relief requested. See S. E. C. v. Lauer, 445 F. Supp. 2d 1362, 1370 (S.D. Fla. 2006) (noting that there is no requirement for the restrained assets be traceable to the fraudulent activity underlying a lawsuit); Levi Strauss & Co. v. Sunrise Int'l Trading, 51 F.3d at 987-88 (upholding asset restraint, including assets not linked to the profits of the alleged illegal activity, noting the defendants may request the court exempt any particular assets); Kemp v. Peterson, 940 F.2d 110, 113-14 (4th Cir. 1991) (district court may restrain assets not specifically traced to illegal activity). In substantially similar cases, this Court and others have entered the precise relief sought herein.<sup>5</sup>

Similarly, in Reebok v. Marnatech, the District Court granted Reebok a limited restraint of the defendants' assets for the purpose of preserving those assets, thus ensuring the availability of a meaningful accounting after trial. Reebok Int'l Ltd., 737 F. Supp. at 1526. In affirming the decision, the Ninth Circuit determined that the plaintiff met its burden of demonstrating: (1) a likelihood of success on the merits; (2) immediate and irreparable harm because of defendants' counterfeiting activities; and (3) that defendants might hide their allegedly ill-gotten profits if their

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<sup>5</sup> See e.g., Chanel, Inc. v. Individuals, No. 24-cv-22336-BLOOM/Elfenbein, 2024 U.S. Dist. LEXIS 158234 (S.D. Fla. June 24, 2024) (Order granting Temporary Restraining Order, *inter alia*, restraining funds held or received by financial institution to preserve assets to satisfy plaintiff's requested relief); adidas AG v. Individuals, Bus. Entities, & Unincorporated Ass'ns Identified on Schedule "A", No. 23-62188-CIV-BLOOM, 2023 U.S. Dist. LEXIS 214777 (S.D. Fla. Nov. 22, 2023) (same); Richemont Int'l SA v. Individuals, Bus. Entities & Unincorporated Ass'ns, No. 22-cv-61064-BLOOM, 2022 U.S. Dist. Lexis 104707 (S.D. Fla. June 8, 2022) (same); Yeti Coolers, LLC v. Individuals, Business Entities & Unincorporated Ass'ns, No. 21-cv-62008-BLOOM, 2021 U.S. Dist. LEXIS 197592 (S.D. Fla. Sept. 28, 2021) (same); S.A.S. Jean Cassegrain, et al. v. Individuals, Bus. Entities, & Unincorporated Ass'ns, Case No. 25-cv-20181-BLOOM (S.D. Fla. Jan. 15, 2025) (same); Burberry Limited, et al. v. Individuals, Bus. Entities, & Unincorporated Ass'ns, Case No. 24-cv-24954-Bloom (S.D. Fla. Dec. 20, 2024) (same); Chanel, Inc. v. Individuals, Bus. Entities, & Unincorporated Ass'ns, Case No. 24-cv-24928-BLOOM (S.D. Fla. Dec. 17, 2024) (same). See also 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); Chanel, Inc. v. Individuals, No. 24-cv-60970- LEIBOWITZ, 2024 U.S. Dist. LEXIS 188588 (S.D. Fla. July 25, 2024) (same); Tiffany (NJ) LLC v. Individuals, Bus. Entities, & Unincorporated Ass'ns Identified on Schedule "A", No. 24-60442-Civ-DIMITROULEAS, 2024 U.S. Dist. Lexis 91128, 2024 WL 2139348 (S.D. Fla. Mar. 22, 2024) (same).

assets were not frozen. Reebok Int'l Ltd., 970 F.2d 552, 563 (9th Cir. 1992). Moreover, the Court reasoned: “because the Lanham Act authorizes the District Court to grant Reebok an accounting of [defendant’s] profits as a form of final equitable relief, the District Court has the inherent power to freeze [defendant’s] assets in order to ensure the availability of that final relief.” Reebok Int'l Ltd., 970 F.2d. at 559; see also Republic of Philippines v. Marcos, 862 F.2d 1355, 1364 (9th Cir. 1988), cert. denied, 490 U.S. 1035 (1989) (“[a] court has the power to issue a preliminary injunction in order to prevent a defendant from dissipating assets in order to preserve the possibility of equitable remedies”).

Using the power to issue provisional remedies ancillary to their authority to provide final equitable relief, numerous courts have granted orders restraining defendants from transferring their assets under trademark infringement claims. See e.g., Levi Strauss, 51 F.3d at 987; Reebok Int'l Ltd., 970 F.2d at 559. Moreover, to provide complete equitable relief, courts have granted such orders without providing notice to the defendants. Specifically, federal courts have held that where advance notice of an asset restraint is likely to cause a party to alienate the assets sought to be restrained, a temporary restraining order may be issued *ex parte*. See F.T. Int'l Ltd v. Mason, 2000 WL 1514881 \*3 (E.D. Pa. 2000) (granting *ex parte* TRO restraining defendants’ bank accounts upon finding that advance notice would likely have caused the defendants to secret or alienate funds); CSC Holdings, Inc. v. Greenleaf Elec., Inc., 2000 WL 715601 (N.D. Ill. 2000) (granting *ex parte* TRO enjoining cable television pirates and restraining pirates’ assets).

Defendants’ blatant violations of federal trademark laws warrant an *ex parte* order restraining the transfer of their assets. Moreover, as Defendants’ businesses are conducted anonymously over the Internet, Plaintiff has additional cause for *ex parte* relief, as Defendants may easily secret or transfer their assets without the Court’s or Plaintiff’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 Plaintiff’s evidence of counterfeiting and infringement, Plaintiff respectfully requests this Court require it to post a bond of no more than ten thousand dollars (\$10,000.00), subject to increase at the Court’s discretion should an application be made in the interest of justice.

#### IV. CONCLUSION

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

DATED: January 23, 2025.

Respectfully submitted,  
STEPHEN M. GAFFIGAN, P.A.

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E-mail: [Raquel@smgpa.cloud](mailto:Raquel@smgpa.cloud)

Attorneys for Plaintiff

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

<b>Def. No.</b>	<b>Defendant / E-commerce Store Name</b>	<b>Payee Information</b>	<b>Merchant ID</b>	<b>PayPal E-mail</b>	<b>Additional Means of Contact</b>
1	aaawatch.to	aaamontre@gmail.com	L4FVGTYDXH A2Y		aaa-watch@outlook.com
2	astonishing.top	南昌高新区知选 贸易商行	MLJBSMP243W 6C		tingxicm@outlook.com
2	fashiones.top	南昌高新区知选 贸易商行	MLJBSMP243W 6C		tingxicm@outlook.com iwcslife@outlook.com
3	bestwatches.to	13912343095@139.com	XVQTNF9LYL7 HS		ibestwatches2020@hotmail.com
4	betterlifego.com		6KYHVUP45RS W2		CustomerService@ashoesfactory.com
4	shoefactory.top	zi bo wei cai mao yi you xian gong si	HKGKQZ2CKW 3K2		CustomerService@ashoesfactory.com
5	blog.12h.to	潘浩		leonberenguer445@gmail.com	WhatsApp: +852 6703 0781 WhatsApp: +852 6403 5279
6	buyonbest.com a.k.a. bobjewelry.com	Tran Ha Giang		hatranha833@gmail.com	support@buyonbest.com sale@buyonbest.com
6	bobjewelry.com		FP37G4QXV8U EE		support@bobjewelry.com support@buyonbest.com
7	cashial.online	太原爱食客餐饮管理有限公司	27FL5UUAP33G J		interhz11@163.com
7	grgdger.online	太原爱食客餐饮管理有限公司	27FL5UUAP33G J		interhz11@163.com
8	cheercash.online	北京京西弘基商业有限公司	CCATQHZ7P44 ZS		
9	chicstime.com		F6C5GX2ULBS YC	byrondeems3138@gmail.com	byrondeems3138@gmail.com

10	chris-luxury.shop	陕西暖尧建闹网络科技有限公司		cbx19977@outlook.com	115070853475@gmail.com vipservicecenter@outlook.com Mailiuy@outlook.com swissmadeluxury.cai@gmail.com
11	clothes.nu			soonzai227@gmail.com	depursesbag@hotmail.com  WhatsApp: +86 186 6602 1721
12	cloverjw.com	Changting County Lianzhongxin Department Store Operations Department  Changting County Lianzhongxin Department Store Business Department		342212184@qq.com	support@cloverjw.com
13	cnxscs.store a.k.a. yewugu.store		7DATNYQ3NWMW4		Customer.service@henwinto.com order.service@henwinto.com
13	cysenwk.shop a.k.a. yewugu.store		8TQRCSTZA743J		Customer.service@henwinto.com order.service@henwinto.com
13	kwsdrfh.shop		QVH544T9VF3T4		Customer.service@henwinto.com
14	daxiewatch.shop	杭州磐辰贸易有限公司	ZK7RVBVX6B9QE		kezhzhouwei0514@gmail.com
15	emuobag.shop	文 智弘 @41y8	KF29JLWXMCQWA		support@emuobag.shop worldsroderickthiyiph@gmail.com sales@emuobag.shop
15	wwcbag.shop	文 智弘 @41y8  智弘 文	KF29JLWXMCQWA	asd763881227@163.com	cntopshoes@gmail.com support@wwcbag.shop sales@wwcbag.shop

		文 智弘 @41y8	KF29JLWXMC QWA		support@wwcbag.shop cntopshoes@gmail.com sales@wwcbag.shop
15	zvldbag.shop	文 智弘 @41y8	KF29JLWXMC QWA		support@zvldbag.shop worldsroderickthiyiqph@ gmail.com sales@zvldbag.shop
16	ffluxury.top		ZRPT6GFVNH MH6		djtecknoservice@gmail.c om service@luxurydpt.com
17	getjewelrys.com	武欣欣		maryjohna@hotma il.com	kerytony88@gmail.com
18	gilltime.com	Gilltime	KSDAR3RJQLR Y8		vipwatchesreplica@hotm ail.com
19	goodv-jewellery.store	Zhang Jin @cyoushin	RQWCB59VNH MPA		support@goodv- jewelry.com info@roejewels.com business@goodv- jewelry.com  WhatsApp: +852 5108 3462
19	goodv-jewellery.com			chenglizhu95@gm ail.com	info@roejewels.com info@rosetomorrow.com  WhatsApp: + 852 6337 7012
20	iwcwatch.life	义乌市菊彭3贸易 商行	GL7G2VCVE25 RA		bookerdivollco@hotmail. com tingxicm@outlook.com
21	jeordwatch.co	Zhang Di @jeordwatch6	URHE6GQMLJ WS6		jeordwatch@gmail.com info@jeordwatch.co
22	kernelluxuy.com			dx18605886632 @163.com	Andrewchun69@gmail.c om PWP- 0633DA0F87C7D7C775 C46E2D5D2EFE5B@P RIVACYGUARDIAN.O RG  WhatsApp: +86 190 1281 5052

22	supermanluxury.com			dx18605886632@163.com	Andrewchun69@gmail.com WhatsApp: +86 190 1281 5052
23	kohvjewelry.com		VQGKNHFJA4JXA		support@kohvjewelry.com
24	marielco.com		5SPGDZVCY8TB4		support@marielco.com
25	mqs.shop	PRODO CROWN SHOP	HL9H8UF8QJ7WJ		mqbee88@gmail.com
25	sdy.shop		HL9H8UF8QJ7WJ		mqbee88@gmail.com
26	primetickers.com		P3VJHHV6QP33N		contact@primetickers.com 3CF0EA2B6C524D4A9787E74AC513B837.PR OTECT@WITHHELDFORPRIVACY.COM
27	puhjfyhj.online	洛阳灿佳商贸有限公司	UXP93MQVUA2DG		ieu9989@163.com
28	rariate.com	N&M Co. Ltd	W689E84A4SR9W		admin@elttes.com PW-50A9F0166DEF5832FC2841216DCBBCA9@PRIVACYGUARDIAN.ORG
29	replicabest.store		9WLP868VMUY6E		
30	repicaluxuryshop.com	RSL Online Platform	CNG2LHREQEYW8		contact@repicaluxuryshop.com
31	replicawatch.shop	Bartoletti-Lockman		PankratzCooner445@gmail.com	service@replicawatch.shop
32	replicawatchesworld.com	Tuán Lê @bonsaiworld	ZDUUH5QKZH KQC		replicawatchesworldus.com@gmail.com 5C2360736F934E32BD ADBC7C2EAD6CE6.PR OTECT@WITHHELDFORPRIVACY.COM
33	repicawrist.com			moramlisa@gmail.com	support@repicawrist.com WhatsApp: +44 7532 820531

34	repwatchplug.com	Angelo Williams @Hrt50		wangelo655@gmail.com	info@repwatchplug.com repwatchplug@gmail.com Hypepay2021@gmail.com
35	royal-jewelry.shop	涛中 董		Tongtaozhong@gmail.com	info@royal-jewelrys.com support@charmaries.com  WhatsApp: +852 4688 3784
36	shoppingservices.top	Yi Jie Trading Co., Ltd.	PE72TH3MCSZ 8G		support@shoppingservices.com
36	us.watchswiss.top	Yi Jie Trading Co., Ltd.	PE72TH3MCSZ 8G		support@shoppingservices.com
37	storeluxury.top		N9VRJDULAPS WL	linhuodan@yeah.net	us@onlineshoppingservices.com
38	superreplica.shop		CLQ752BLKTY 8A		support@superreplica.shop
39	swisswatchesf.com	guang zhou rui yu tu ke ji you xian gong si	RHW23KWUFN 988		info@sportsservir.com PW-5F897A95B33D888339F8C2484FCDC731@PRIVACYGUARDIAN.ORG
39	watchesdd.com		KTD6G262PAK C4		info@sportsservir.com PW-CCB114C5EA35472289F6CA71DE275D8D@PRIVACYGUARDIAN.ORG
40	tickunique.is	MeetCadeau Co., Ltd.	6QLHZ526VAB 74	vinking-wiio@outlook.com	cstickunique@gmail.com WhatsApp: +44 7355 236610
41	vincyrep.ru			ganyong2019@outlook.com	admin@liomui.com vincystore@hotmail.com
		福来 黄		fulai-2022@outlook.com	vincystore@hotmail.com admin@liomui.com WhatsApp: +86 187 5092 5283