

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-cv-20335-BLOOM/Elfenbein

RICHEMONT INTERNATIONAL SA,

Plaintiff,

v.

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

Defendants.

**SEALED ORDER GRANTING PLAINTIFF’S *EX PARTE* APPLICATION
FOR ENTRY OF TEMPORARY RESTRAINING ORDER**

THIS CAUSE is before the Court upon Plaintiff’s *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets (the “Application for Temporary Restraining Order” or “Application”), ECF No. [10]. The Court has carefully considered the Application for Temporary Restraining Order, the record in this case, the applicable law, and is otherwise fully advised. For the following reasons, Plaintiff’s Application is granted.

By the instant Application, Plaintiff, Richemont International SA (“Plaintiff”), moves *ex parte* pursuant to 15 U.S.C. § 1116, Federal Rule of Civil Procedure 65, The All Writs Act, 28 U.S.C. § 1651(a), and this Court’s inherent authority, for entry of a temporary restraining order and an order restraining the financial accounts used by Defendants.¹ Upon expiration of the temporary restraining order, Plaintiff seeks a preliminary injunction against Defendants, for

¹ Defendants are the Individuals, Business Entities, and Unincorporated Associations identified on Schedule “A”.

alleged violations of the Lanham Act, 15 U.S.C. §§ 1114 and 1125(a). Because Plaintiff has satisfied the requirements for the issuance of a temporary restraining order, the Court grants Plaintiff's Application for Temporary Restraining Order.

I. BACKGROUND²

Plaintiff Richemont International SA is the owner of the following trademarks (the "Plaintiff's Marks"), which are valid and registered on the Principal Register of the United States Patent and Trademark Office (USPTO):

Registered Trademark	Registration Number	Registration Date	Classes/Goods
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.

² The factual background is taken from Plaintiff's Complaint, ECF No. [1], Plaintiff's Application for Temporary Restraining Order, ECF No. [10], and supporting evidentiary submissions. Plaintiff filed declarations and exhibits annexed thereto in support of its Application for Temporary Restraining Order. The declarations are available in the docket at the following entries: Tritton Decl., ECF No. [10-1], Gaffigan Decl., ECF No. [10-2], and Burns Decl., ECF No. [10-3].

<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
TANK	1,006,321	March 11, 1975	IC 014 - Watches
SANTOS	1,344,284	June 25, 1985	IC 014 - Watches
PANTHERE	1,353,952	August 13, 1985	IC 014 - Watches
PANTHERE DE CARTIER	1,365,478	October 15, 1985	IC 014 - Watches
BALLON BLEU	3,476,888	July 29, 2008	IC 014 - Watches, Chronometers, Clocks
<i>Cartier</i>	4,178,047	July 24, 2012	IC 014 - Jewelry and watches

See Decl. of Emma-Jane Tritton (Tritton Decl.), ECF No. [10-1] ¶ 6; ECF No. [1-2] (containing Certificates of Registrations for the Plaintiff's Marks at issue). The Plaintiff's Marks are used in

connection with the manufacture, promotion, distribution, and sale of high-quality goods in the categories identified above. *See* Tritton Decl., ECF No. [10-1] ¶¶ 5-7.

Defendants, by operating the Internet based e-commerce stores under the seller names (the “E-commerce Store Names”) identified on Schedule “A” have advertised, promoted, offered for sale, or sold goods bearing and/or using what Plaintiff has determined to be counterfeits, infringements, reproductions, and/or colorable imitations of the Plaintiff’s Marks. *See id.* ¶¶ 11-15; Decl. of Stephen M. Gaffigan (Gaffigan Decl.), ECF No. [10-2] ¶¶ 2-3; Decl. of Kathleen Burns (Burns Decl.), ECF No. [10-3] ¶ 4.

Although each Defendant may not copy and infringe each of the Plaintiff’s Marks for each category of goods protected, Plaintiff has submitted sufficient evidence showing that each Defendant has infringed at least one or more of the Plaintiff’s Marks. *See* Tritton Decl., ECF No. [10-1] ¶¶ 11-15. Defendants are not now, nor have they ever been, authorized or licensed to use, reproduce, or make counterfeits, reproductions, or colorable imitations of the Plaintiff’s Marks. *Id.* ¶¶ 11, 14-15.

Plaintiff’s counsel retained Invisible Inc, a licensed private investigative firm (“Invisible”), 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. *See* Tritton Decl., ECF No. [10-1] ¶ 12; Gaffigan Decl., ECF No. [10-2] ¶ 2; Burns Decl., ECF No. [10-3] ¶ 3. Invisible accessed the Internet based e-commerce stores operating under Defendants’ E-commerce Store Names,³ placed an order from each Defendant for the purchase of a product

³ 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

bearing and/or using counterfeits at least one of the Plaintiff's Marks and requested each product be shipped to the Southern District of Florida.⁴ *See* Burns Decl., ECF No. [10-3] ¶ 4 and ECF Nos. [10-4] – [10-6]. Each order was processed entirely online and following the submission of the orders, Invisible received information for finalizing payment⁵ for the various products ordered on each of the Defendants' e-commerce stores as identified on Schedule "A." *See id.* At the conclusion of the process, the detailed web page captures and images of the various products bearing and/or using the Plaintiff's Marks offered for sale and ordered via Defendants' E-commerce Store Names were sent to Plaintiff's representative for inspection. *See* Tritton Decl., ECF No. [10-1] ¶¶ 4, 11-15; Gaffigan Decl., ECF No. [10-2] ¶ 2; Burns Decl., ECF No. [10-3] ¶ 4.

Under the direct supervision of Plaintiff's representative, 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. *See* Tritton Decl., ECF No. [10-1] ¶¶ 4, 11-15.

II. LEGAL STANDARD

In order to obtain a temporary restraining order, a party must demonstrate "(1) [there is] a substantial likelihood of success on the merits; (2) that irreparable injury will be suffered if the

provided by Defendants, including e-mail addresses and WhatsApp phone numbers are also identified on Schedule "A" hereto. (Burns Decl., ECF No. [10-3] ¶ 4, n.1.)

⁴ 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. (Burns Decl., ECF No. [10-3] ¶ 4, n.2.)

⁵ Invisible did not transmit the funds to finalize the sale for orders from many of the Defendants purportedly to avoid adding additional funds to Defendants' coffers. Gaffigan Decl., ECF No. [10-2] ¶ 2 n.1; Burns Decl., ECF No. [10-3] ¶ 4 n.3.

relief is not granted; (3) that the threatened injury outweighs the harm the relief would inflict on the nonmovant; and (4) that the 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) (applying the test to a preliminary injunction in a Lanham Act case). Additionally, a court may only issue a temporary restraining order without notice to the adverse party or its attorney if:

(A) specific facts in an affidavit or a verified complaint clearly show that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition [and] (B) the movant’s attorney certifies in writing any efforts made to give notice and the reasons why it should not be required.

Fed. R. Civ. P. 65(b)(1). *Ex parte* temporary restraining orders “should be restricted to serving their underlying purpose of preserving the status quo and preventing irreparable harm just so long as is necessary to hold a hearing, and no longer.” *Granny Goose Foods, Inc. v. Bhd. of Teamsters & Auto Truck Drivers Local No. 70*, 415 U.S. 423, 439 (1974).

III. DISCUSSION

The declarations Plaintiff submitted in support of its Application for Temporary Restraining Order support the following conclusions of law:

1. Plaintiff has a strong probability of proving at trial that consumers are likely to be confused by Defendants’ advertisement, promotion, sale, offer for sale, and/or distribution of goods bearing and/or using counterfeits, reproductions, or colorable imitations of the Plaintiff’s Marks, and that the products Defendants are selling and promoting for sale are copies of the Plaintiff’s products that bear and/or use copies of the Plaintiff’s Marks;

2. Because of the infringement of the Plaintiff’s Marks, Plaintiff is likely to suffer immediate and irreparable injury if a temporary restraining order is not granted. It appears from the following specific facts, as set forth in Plaintiff’s Complaint, Application for Temporary

Restraining Order, and accompanying declarations on file, that immediate and irreparable loss, damage, and injury will result to Plaintiff and to consumers before Defendants can be heard in opposition unless the Plaintiff's request for *ex parte* relief is granted:

1. Defendants own or control Internet based e-commerce stores operating under their E-commerce Store Names that advertise, promote, offer for sale, and sell products bearing and/or using counterfeit and infringing trademarks in violation of the Plaintiff's rights;

2. There is good cause to believe that more counterfeit and infringing products bearing and/or using Plaintiff's trademarks will appear in the marketplace; that consumers are likely to be misled, confused, and disappointed by the quality of these products; and that Plaintiff may suffer loss of sales for its genuine products; and

3. There is good cause to believe that if Plaintiff proceeds on notice to the Defendants of this Application for Temporary Restraining Order, Defendants can easily and quickly change the ownership or modify e-commerce store data and content, change payment accounts, redirect consumer traffic to other e-commerce store names, and transfer assets and ownership of the E-commerce Store Names, thereby thwarting Plaintiff's ability to obtain meaningful relief.

3. The balance of potential harm to the Defendants in restraining their trade in counterfeit and infringing branded goods if a temporary restraining order is issued is far outweighed by the potential harm to Plaintiff, its reputation, and its goodwill as a manufacturer and distributor of quality products if such relief is not issued.

4. The public interest favors issuance of the temporary restraining order to protect the Plaintiff's trademark interests and protect the public from being defrauded by the palming off of counterfeit goods as Plaintiff's genuine goods.

5. Under 15 U.S.C. § 1117(a), Plaintiff may be entitled to recover, as an equitable remedy, the illegal profits gained through Defendants' distribution and sales of goods bearing and/or using counterfeits and infringements of the Plaintiff's Marks. *See Reebok Int'l, Ltd. v. Marnatech Enters., Inc.*, 970 F.2d 552, 559 (9th Cir. 1992) (quoting *Fuller Brush Prods. Co. v. Fuller Brush Co.*, 299 F.2d 772, 777 (7th Cir. 1962) ("An accounting of profits under § 1117(a) is not synonymous with an award of monetary damages: '[a]n accounting for profits . . . is an equitable remedy subject to the principles of equity.'")).

6. Requesting 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." *Levi Strauss & Co.*, 51 F.3d at 987 (citing *Federal Trade Commission v. United States Oil & Gas Corp.*, 748 F.2d 1431, 1433-34 (11th Cir. 1984)).

7. Considering the inherently deceptive nature of the counterfeiting business, and the likelihood that the Defendants have violated federal trademark laws, Plaintiff has good reason to believe the Defendants will hide or transfer their ill-gotten assets beyond the jurisdiction of this Court unless those assets are restrained.

IV. CONCLUSION

Accordingly, it is **ORDERED AND ADJUDGED** that pursuant to 15 U.S.C. § 1116, Federal Rule of Civil Procedure 65, 28 U.S.C. § 1651(a), and the Court's inherent authority, Plaintiff's Application for Temporary Restraining Order, **ECF No. [10]**, is **GRANTED** as follows:

1. Each Defendant, its officers, directors, employees, agents, subsidiaries, distributors, and all persons in active concert or participation with any Defendant having notice of this Order are hereby temporarily restrained as follows:

- a. From manufacturing, importing, advertising, promoting, offering to sell, selling, distributing, or transferring any products bearing and/or using the Plaintiff's Marks, or any confusingly similar trademarks, other than those actually manufactured or distributed by the Plaintiff; and
 - b. From secreting, concealing, destroying, selling off, transferring, or otherwise disposing of: (i) any products, not manufactured or distributed by the Plaintiff, bearing and/or using the Plaintiff's Marks, or any confusingly similar trademarks; (ii) any evidence relating to the manufacture, importation, sale, offer for sale, distribution, or transfer of any products bearing and/or using the Plaintiff's Marks, or any confusingly similar trademarks; or (iii) any assets or other financial accounts subject to this Order, including inventory assets, in the actual or constructive possession of, or owned, controlled, or held by, or subject to access by, any Defendant, including, but not limited to, any assets held by or on behalf of any Defendant.
2. Each Defendant, its officers, directors, employees, agents, subsidiaries, distributors, and all persons in active concert or participation with any Defendant having notice of this Order shall immediately discontinue the use of the Plaintiff's Marks or any confusingly similar trademarks, on or in connection with all Internet based e-commerce stores owned and operated, or controlled by them, including the Internet based e-commerce stores operating under the E-commerce Store Names;
3. Each of the Defendants, its officers, directors, employees, agents, subsidiaries, distributors, and all persons in active concert or participation with any Defendants having notice of this Order shall immediately discontinue the use of the Plaintiff's Marks, or any confusingly similar trademarks, within domain name extensions, metatags or other markers

within website source code, from use on any webpage (including as the title of any web page), from any advertising links to other websites, from search engines' databases or cache memory, and any other form of use of such terms that are visible to a computer user or serves to direct computer searches to e-commerce stores registered, owned, or operated by any Defendant, including the Internet based e-commerce stores operating under the E-commerce Store Names;

4. Each Defendant shall preserve copies of all computer files relating to the use of any of the E-commerce Store Names and shall take all steps necessary to retrieve computer files relating to the use of the E-commerce Store Names that may have been deleted before the entry of this Order;

5. Upon Plaintiff's request, the privacy protection service for any of the E-commerce Store Names for which the registrant uses such privacy protection service to conceal the registrant's identity and contact information is ordered to disclose to Plaintiff the true identities and contact information of those registrants;

6. Upon receipt of notice of this Order, the Defendants and all financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to, PayPal, Inc. ("PayPal"), and their related companies and affiliates, shall immediately (i) identify all financial accounts and/or sub-accounts, associated with the Internet based e-commerce stores operating under the E-commerce Store Names, the payment accounts, payees, merchant identification numbers, and/or the e-mail addresses identified on Schedule "A" hereto, as well as any other related accounts of the same customer(s); (ii) identify all other accounts that transfer funds into the same financial institution account(s), and/or any of the other financial accounts subject to this Order; (iii)

restrain the transfer of all funds, as opposed to ongoing account activity, held or received for their benefit or to be transferred into their respective financial accounts, and any other financial accounts tied thereto; and (iv) divert those restrained funds to a holding account for the trust of the Court;

7. Upon receipt of notice of this Order, Defendants and all financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to, PayPal, and their related companies and affiliates, shall further, within five business days of receiving notice of this Order, provide Plaintiff's counsel with all data that details (i) an accounting of the total funds restrained and identify the financial account(s) and sub-account(s) which the restrained funds are related to, and (ii) the account transactions related to all funds transmitted into the financial account(s) and sub-account(s) which have been restrained. Such restraining of the funds and the disclosure of the related financial institution account information shall be made without notice to the account owners or the financial institutions until after those accounts are restrained. No funds restrained by this Order shall be transferred or surrendered by any financial institution, payment processor, bank, escrow service, money transmitter, or marketplace website, including but not limited to, PayPal, and their related companies and affiliates for any purpose (other than pursuant to a purchase refund chargeback made by a consumer) without the express authorization of this Court;

8. Any Defendant or financial institution account holder subject to this Order may petition the Court to modify the asset restraint set out in this Order;

9. This Order shall apply to the E-commerce Store Names, associated e-commerce stores, and financial accounts, any other seller identification names, e-commerce store

names, private messaging accounts, or financial accounts that are being used by Defendants for the purpose of counterfeiting the Plaintiff's Marks and/or unfairly competing with the Plaintiff;

10. As a matter of law, this Order shall no longer apply to any Defendant or associated e-commerce store dismissed from this action or as to which Plaintiff has withdrawn its request for a temporary restraining order;

11. This Order shall remain in effect until the date for the hearing on the Motion for Preliminary Injunction set forth below, or until such further dates as set by the Court or stipulated by the parties;

12. Pursuant to 15 U.S.C. § 1116(d)(5)(D) and Federal Rule of Civil Procedure 65(c), Plaintiff shall post a bond in the amount of Ten Thousand Dollars and Zero Cents (\$10,000.00), as payment of damages to which Defendants may be entitled for a wrongful injunction or restraint, during the pendency of this action, or until further Order of the Court. In the Court's discretion, the bond may be subject to increase should an application be made in the interest of justice;

13. **A hearing** is set before this Court via **Zoom video conference** on **February 6, 2025, at 10:00 a.m.**, at which time Defendants and/or any other affected persons may challenge the appropriateness of this Order and move to dissolve the same and at which time the Court will hear argument on Plaintiff's requested preliminary injunction. The parties shall appear virtually by accessing the following hyperlink to enter the virtual meeting on the Zoom application: **<https://www.zoomgov.com/j/16191705654?pwd=WmlmK0RpelQ5bUZhdTVGM3RUMHZoUT09>**. Alternatively, the **Meeting ID is 161 9170 5654**; and the **Passcode is 692150**. **Defendants who are business entities must be represented by counsel at the hearing.** *Palazzo v. Gulf Oil*

Corp., 764 F.2d 1381, 1385 (11th Cir. 1985) (“The rule is well established that a corporation is an artificial entity that can act only through agents, cannot appear pro se, and must be represented by counsel.”).

14. After Plaintiff’s counsel has received confirmation from the financial institutions regarding the funds restrained as directed herein, Plaintiff shall serve a copy of the Complaint, Application, and this Order, on each Defendant by e-mail and/or online contact form or other means of electronic contact provided on the Internet based e-commerce stores operating under the E-commerce Store Names, or by providing a copy of this Order by e-mail to the registrars of record for each of the E-commerce Store Names so that they, in turn, notify each Defendant of the Order, or by other means reasonably calculated to give notice which is permitted by the Court. In addition, Plaintiff shall post copies of the Complaint, Application, and this Order, as well as all other documents filed in this action, on the website located at <http://servingnotice.com/RUM7tz/index.html>, and shall provide the address to the website to Defendants via e-mail/online contact form, and such notice so given shall be deemed good and sufficient service thereof. Plaintiff shall continue to provide notice of these proceedings and copies of the documents on file in this matter to the Defendants by regularly updating the website located at <http://servingnotice.com/RUM7tz/index.html>, or by other means reasonably calculated to give notice which is permitted by the Court;

15. Additionally, for the purpose of providing additional notice of this proceeding, and all other pleadings, orders, and documents filed herein, the owners, operators, and/or administrators of the e-commerce stores, messaging services, and/or financial institutions, payment processors, banks, escrow services, and money transmitters, and marketplace

platforms, including but not limited to, PayPal, and their related companies and affiliates shall, at Plaintiff's request, provide Plaintiff's counsel with any e-mail address known to be associated with the Defendants' respective E-commerce Store Names;

16. **Any response or opposition** to the Plaintiff's Motion for Preliminary Injunction must be filed and served on the Plaintiff's counsel forty-eight (48) hours prior to the hearing set for **February 6, 2025, at 10:00 a.m.**, and filed with the Court, along with Proof of Service. Plaintiff shall file any Reply Memorandum **twenty-four (24) hours** prior to the hearing set for **February 6, 2025, at 10:00 a.m.**, The above dates may be revised upon stipulation by all parties and approval of this Court.

17. Defendants are hereby on notice that failure to appear at the hearing may result in the imposition of a preliminary injunction against them pursuant to 15 U.S.C. § 1116(d), The All Writs Act, 28 U.S.C. § 1651(a), Federal Rule of Civil Procedure 65, and this Court's inherent authority.

18. The Clerk shall file this Order under seal until further order of the Court.

DONE AND ORDERED in Chambers at Miami, Florida, on January 24, 2025.

A handwritten signature in black ink, appearing to be 'JB' or similar, written over a horizontal line.

BETH BLOOM
UNITED STATES DISTRICT JUDGE

Copies to: Counsel of Record

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

Def. No.	Defendant / E-commerce Store Name	Payee Information	Merchant ID	PayPal E-mail	Additional Means of Contact
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	cnxsces.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 worldsroderickthiyiqh@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		ZRPT6GFWNH 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	mqszy.shop	PRODO CROWN SHOP	HL9H8UF8QJ7WJ		mqbee88@gmail.com
25	sdyz.shop		HL9H8UF8QJ7WJ		mqbee88@gmail.com
26	primetickers.com		P3VJHHV6QP33N		contact@primetickers.com 3CF0EA2B6C524D4A9787E74AC513B837.PR OTECT@WITHHELDFORPRIVACY.COM
27	puhfyhj.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 5C2360736F934E32BDADBC7C2EAD6CE6.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 童		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
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