

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 25-CV-21134-RAR**

**RICHEMONT INTERNATIONAL SA,**

Plaintiff,

v.

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

Defendants.

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**ORDER GRANTING MOTION FOR PRELIMINARY INJUNCTION**

**THIS CAUSE** comes before the Court upon Plaintiff, Richemont International SA’s (“Plaintiff”), *Ex Parte* Application for Entry of Temporary Restraining Order and Preliminary Injunction (“Motion”), [ECF No. 8], filed on March 12, 2025. Plaintiff alleges that Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule “A” attached hereto (collectively, “Defendants”), are infringing upon Plaintiff’s trademarks and promoting and selling counterfeits of Plaintiff’s branded goods through the operation of Internet based e-commerce stores under their seller identification names as set forth on Schedule “A” (“E-commerce Store Names”). Among other requests, Plaintiff asks the Court to enjoin Defendants from producing or selling goods that infringe its trademarks.

On March 18, 2025, the Court issued an Order (“Temporary Restraining Order”), [ECF No. 10], granting Plaintiff’s *Ex Parte* Motion for a Temporary Restraining Order. Defendants were served with relevant case documents on March 18, 2025 and March 20, 2025. *See* [ECF Nos. 16, 17, 18, 20]. Defendants have neither formally responded to the Motion, made any filings in this case, nor appeared in this matter either individually or through counsel. On March 28, 2025, the Court held a hearing concerning the requested preliminary injunction (“Hearing”), [ECF

No. 21]. No Defendants appeared. *Id.* Accordingly, the Court having carefully considered the Motion, the record, and being otherwise fully advised, it is hereby

**ORDERED AND ADJUDGED** that pursuant to 15 U.S.C. § 1116, Federal Rule of Civil Procedure 65, 28 U.S.C. § 1651(a), and this Court’s inherent authority, Plaintiff’s Motion, [ECF No. 8], is **GRANTED** as set forth herein.

### **INTRODUCTION**

Plaintiff raises four claims for relief: (1) trademark counterfeiting and infringement under section 32 of the Lanham Act; (2) false designation of origin under section 43(a) of the Lanham Act; (3) unfair competition under Florida common law; and (4) trademark infringement under Florida common law. *See* Am. Compl., [ECF No. 12] ¶¶ 37–62. Plaintiff alleges Defendants are promoting, advertising, distributing, offering for sale, and selling counterfeit and infringing versions of Plaintiff’s branded products within the Southern District of Florida through Internet based e-commerce stores operating under the E-commerce Store Names identified on Schedule “A.” *See generally id.*

Plaintiff alleges Defendants’ unlawful activities have caused and will continue to cause irreparable injury because Defendants have (1) deprived Plaintiff of its right to determine the manner in which its trademarks are presented to the public through merchandising; (2) defrauded the public into thinking Defendants’ goods are goods authorized by Plaintiff; (3) deceived the public as to Plaintiff’s association with Defendants’ goods and the e-commerce stores marketing and selling the goods; and (4) wrongfully traded and capitalized on Plaintiff’s reputation and goodwill as well as the commercial value of Plaintiff’s trademarks. *See generally id.* By its Motion, Plaintiff moves for the issuance of a preliminary injunction against Defendants for violations of the Lanham Act. *See* Mot. at 8–15.

**FACTUAL BACKGROUND**<sup>1</sup>

Plaintiff is the owner of the following trademarks which are valid and registered on the Principal Register of the United States Patent and Trademark Office (collectively, “Plaintiff’s Marks”):


**Cartier Trademarks**

Registered Trademark	Registration Number	Registration Date	Class/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.
<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
CARTIER	0,759,201	October 29, 1963	IC 014 - Watches and Clocks
TANK	1,006,321	March 11, 1975	IC 014 - Watches

<sup>1</sup> The factual background is taken from Plaintiff’s Amended Complaint, [ECF No. 12], Plaintiff’s Motion, [ECF No. 8], and supporting evidentiary submissions. Plaintiff also attached declarations and an exhibit in support of its Motion, [ECF Nos. 8-1 through 8-4].

SANTOS	1,344,284	June 25, 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

**IWC Schaffhausen Trademarks**

Trademark	Registration Number	Registration Date	Class / Goods
IWC	1,205,403	August 17, 1982	IC 014 - Watches
PORTOFINO	1,846,680	July 26, 1994	IC 014 – Watches and parts therefore
	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

See Decl. of Emma-Jane Tritton (“Tritton Decl.”), [ECF No. 8-1] ¶¶ 5–6. The Plaintiff’s Marks are used in connection with the manufacture and distribution of high-quality goods in the categories identified above. *See id.*

Defendants, by operating Internet based e-commerce stores under the E-commerce Store Names, 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* Tritton Decl. ¶¶ 4, 11–13; Decl. of Stephen M. Gaffigan (“Gaffigan Decl.”), [ECF No. 8-2] ¶ 2; Gaffigan Decl. Composite Ex. 1, [ECF Nos. 8-3, 8-4].

Although each Defendant may not copy and infringe each of Plaintiff's Mark for each category of goods protected, Plaintiff has submitted sufficient evidence showing each Defendant has infringed at least one or more of the Plaintiff's Marks. *See* Tritton Decl. ¶¶ 4, 11–13; Gaffigan Decl. ¶ 2; Gaffigan Decl. Composite Ex. 1. Defendants are not now, nor have they ever been, authorized or licensed to use, reproduce, or make counterfeits, reproductions, and/or colorable imitations of the Plaintiff's Marks. *See* Tritton Decl. ¶¶ 11–13. Under the direct supervision of Plaintiff's representative, Emma-Jane Tritton, Corsearch Inc.'s reviewing representatives reviewed and visually inspected the various items bearing and/or using Plaintiff's Marks offered for sale by Defendants via the Internet based e-commerce stores operating under the E-commerce Store Names and determined the products were non-genuine, unauthorized versions of Plaintiff's branded products. *See id.* ¶¶ 4, 11–13.

### **LEGAL STANDARD**

To obtain a preliminary injunction, a party must demonstrate “(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 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).

### CONCLUSIONS OF LAW

The declarations Plaintiff submitted in support of its Motion support the following conclusions of law:

A. 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 Plaintiff's products that bear and/or use copies of the Plaintiff's Marks.

B. Because of the infringement of the Plaintiff's Marks, Plaintiff is likely to suffer immediate and irreparable injury if a preliminary injunction is not granted. The following specific facts, as set forth in Plaintiff's Amended Complaint, Motion, and accompanying declarations on file, demonstrate that immediate and irreparable loss, damage, and injury will result to Plaintiff and to consumers because it is more likely true than not:

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

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, or disappointed by the quality of these products; and that Plaintiff may suffer loss of sales for its genuine products.

C. The potential harm to Defendants in restraining their trade in counterfeit and infringing branded goods if a preliminary injunction 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.

D. The public interest favors issuance of the preliminary injunction to protect Plaintiff's trademark interests and protect the public from being defrauded by the palming off of counterfeit goods as Plaintiff's genuine goods.

**CONCLUSION**

For the foregoing reasons, it is hereby

**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 Motion, [ECF No. 8], is **GRANTED**. A preliminary injunction is entered 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 restrained and enjoined until further Order of the Court:

- 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 Plaintiff; and
- b. From secreting, concealing, destroying, selling off, transferring, or otherwise disposing of: (i) any products, not manufactured or distributed by Plaintiff, bearing and/or using the Plaintiff's Marks, or any confusingly similar trademarks; or (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.

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, until further Order of the Court, the use of the Plaintiff's

Marks or any confusingly similar trademarks, on or in connection with all 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 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, until further Order of the Court, 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 from 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 e-commerce stores operating under the E-commerce Store Names.

4. Each Defendant shall not transfer ownership of the E-commerce Store Names during the pendency of this action, or until further Order of the Court.

5. Each Defendant shall continue to 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.

6. 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, to the extent not already done, the true identities and contact information of those registrants.

7. The registrars for the E-commerce Store Names shall immediately, to the extent not already done, assist in changing the registrar of record for the E-commerce Store Names to a



holding account with a registrar of Plaintiff's choosing ("New Registrar"), excepting any such E-commerce Store Names which such registrars have been notified in writing by Plaintiff have been or will be dismissed from this action, or as to which Plaintiff has withdrawn its request to immediately transfer such E-commerce Store Names. To the extent the registrars do not assist in changing the registrars of record for the E-commerce Store Names under their respective control within one (1) business day of receipt of this Order, the top-level domain ("TLD") registries for the E-commerce Store Names or their administrators, including backend registry operators or administrators, within five (5) business days of receipt of this Order, shall change, or assist in changing, the registrar of record for the E-commerce Store Names to a holding account with the New Registrar, excepting any such E-commerce Store Names which such registries have been notified in writing by Plaintiff have been or will be dismissed from this action or as to which Plaintiff has withdrawn its request to immediately transfer such e-commerce store names. Upon the change of the registrar of record for the E-commerce Store Names, the New Registrar will maintain access to the E-commerce Store Names in trust for the Court during the pendency of this action. Additionally, the New Registrar shall immediately institute a temporary 302 domain name redirection which will automatically redirect any visitor to the E-commerce Store Names to the following Uniform Resource Locator ("URL") <http://servingnotice.com/Rsf5ca/index.html>, whereon copies of the Amended Complaint, this Order, and all other documents on file in this action shall be displayed. Alternatively, the New Registrar may update the Domain Name System ("DNS") data it maintains for the E-commerce Store Names, which link the E-commerce Store Names to the IP addresses where their associated websites are hosted, to 45.63.17.51, which will cause the E-commerce Store Names to resolve to the website where copies of the Amended Complaint, this Order, and all other documents on file in this action shall be displayed. After the New Registrar has effected this change, the E-commerce Store Names shall be placed on lock

status by the New Registrar, preventing the modification or deletion of the domains by the New Registrar or Defendants.

8. This Order shall apply to the E-commerce Store Names, associated e-commerce stores, and any other E-commerce Store Names which are being used by Defendants for the purpose of counterfeiting the Plaintiff's Marks at issue in this action and/or unfairly competing with Plaintiff.

9. 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 preliminary injunction.

10. Under 15 U.S.C. § 1116(d)(5)(D) and Federal Rule of Civil Procedure 65(c), Plaintiff shall maintain its previously posted bond in the amount of \$10,000.00, [ECF No. 14], 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 in the interest of justice.

11. This Preliminary Injunction shall remain in effect during the pendency of this action, or until further date as set by the Court or stipulated by the parties.

**DONE AND ORDERED** in Miami, Florida, this 31st day of March, 2025.



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**RODOLFO A. RUIZ II**  
**UNITED STATES DISTRICT JUDGE**

**SCHEDULE "A"**  
**DEFENDANTS BY NUMBER, E-COMMERCE STORE NAME,**  
**AND E-MAIL ADDRESSES**

<b>Defendant Number</b>	<b>Defendant / E-commerce Store Name</b>	<b>E-Mail Addresses</b>
1	allswisswatchs.com	watchesc@outlook.com 2010watches@gmail.com
1	allwatchesen.com	2010watches@gmail.com
1	bestwatchss.com	watchesc@outlook.com
1	swissrepicass.com	2010watches@gmail.com
1	swisswatchesale.com	2010watches@gmail.com
2	any-replica-watches.com	anyreplicawatches@gmail.com Chrisanyreplicawatches@gmail.com Order@any-replica-watches.com
2	arwwatchpro.com	anyreplicawatches@gmail.com Chrisanyreplicawatches@gmail.com
3	bestcartierrep.com	bestcartierrep@gmail.com hello@unitedluxuryshop.com
4	bestfakejewelry.com	bestfakejewelry@gmail.com
4	luxuryjewelrywarehouse.com	replicajewelry98@gmail.com
5	buywatchesindubai.com	watchesindubai@gmail.com
5	replicawatchesinuae.com	watchesindubai@gmail.com
5	superclonewatchesdubai.com	watchesindubai@gmail.com
6	chreplica.is	chstore269@gmail.com
6	clean-factory.is	chstore269@gmail.com
7	clonewatch.is	contact@clonewatch.io
8	dubai-watchesuae.com	contact@dubai-watchesuae.com PW- F8E41551A887EB740C2AEE9048841C7B@PRI VACYGUARDIAN.ORG
9	hagobuy.ru	
10	geektime.watch	geektimewatch@outlook.com
11	getwatches.ru	kerytony88@gmail.com
12	giftwatchesboutique.in	Sales@giftwatchesboutique.in
13	goldluxurys.com	watcchgood@gmail.com info@goldluxurys.com
14	hellorolex.watch	sales@HelloRolex.com hellorolex@gmail.com hellook_sally@hotmail.com yuansunet@gmail.com
15	hontwatch-replica.si	oskarjohnatan54@gmail.com

16	hotwatchesreplica.com	salesreplicas@gmail.com
16	replicawatchshop.cc	salesreplicas@gmail.com
17	intime06.co	
18	iwatchclone.co	watchesppaservice@gmail.com
19	luxe-us.com	support@luxe-us.com
20	myswissclones.com	swisseta43@gmail.com
20	super-clones.com	swisseta43@gmail.com SUPER-CLONES.COM@WIX- DOMAINS.COM
20	swissauth.com	info@swissclones.com swisseta43@gmail.com SWISSAUTH.COM@WIX-DOMAINS.COM
20	swissclones.com	swisseta43@wixsiteautomations.com info@swissclones.com swisseta43@gmail.com
21	perfectrepwatches.com	info@perfectrepwatches.com 607D412D4ED1B7B05F30C43340E21AF2- 38626461@CONTACT.GANDI.NET
22	relojesreplicastarlujos.com	luxurys.club1@gmail.com relojesstarlujos@gmail.com 2508030trabajosstarlujos@gmail.com
23	replicaorologi.co	noobfactory@protonmail.ch
24	replicawatchescheap.com	Watchonlinestore1988@gmail.com carloasmatrix@gmail.com
24	reptime.us	watchonlinestore1988@gmail.com VATIFENS9@GMAIL.COM
25	replicawatchesusa.com	ReplicaWatches333@hotmail.com info@Royalwatchespakistan.com.pk info@Bob-Watches.com
25	royal-watches- pakistan.com.pk	info@Royalwatchespakistan.com.pk
25	Royalwatchespakistan.com.pk	
25	timezone.com.pk	info@TimeZone.com.pk
26	replicawatchtr.com	
27	rolexreplica.design	orders@rolexreplica.design
28	ukwatches.io	
28	ukshop.io	
29	watchcopiesale.co	popreplicaservice@gmail.com
30	18kcoraljewelry.com	coralperfect@gmail.com PW- 566B00F8A6987DB564DC9152F80FADC9@PR IVACYGUARDIAN.ORG