

**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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**DEFAULT FINAL JUDGMENT AND PERMANENT INJUNCTION**

**THIS CAUSE** comes before the Court upon Plaintiff’s Motion for Entry of Default Final Judgment (“Motion”), [ECF No. 26]. For the reasons set forth in the Order Granting Plaintiff’s Motion for Default Final Judgment [ECF No. \_\_\_\_], entered separately, it is

**ORDERED AND ADJUDGED** that judgment is hereby entered in favor of Plaintiff, Richemont International SA, and against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule “A” hereto, as follows:

**(1) Permanent Injunctive Relief:**

Defendants and their officers, directors, agents, representatives, servants, employees, subsidiaries, attorneys, and all persons acting in concert and participation with Defendants, are permanently restrained and enjoined from:

a. manufacturing or causing to be manufactured, importing, advertising, or promoting, distributing, selling or offering to sell counterfeit and infringing goods bearing and/or using Plaintiff’s trademarks, or any confusingly similar trademarks identified in Paragraph 14 of the Amended Complaint, (“Plaintiff’s Marks”), *see* [ECF No. 12] ¶ 14;

b. using the Plaintiff's Marks in connection with the sale of any unauthorized goods;

c. using any logo and/or layout that may be calculated to falsely advertise the services or products of Defendants as being sponsored by, authorized by, endorsed by, or in any way associated with Plaintiff;

d. falsely representing themselves as being connected with Plaintiff, through sponsorship or association;

e. engaging in any act that is likely to falsely cause members of the trade and/or of the purchasing public to believe any goods or services of Defendants are in any way endorsed by, approved by, and/or associated with Plaintiff;

f. using any reproduction, counterfeit, copy, or colorable imitation of the Plaintiff's Marks in connection with the publicity, promotion, sale, or advertising of any goods sold by Defendants;

g. affixing, applying, annexing or using in connection with the sale of any goods, a false description or representation, including words or other symbols tending to falsely describe or represent goods offered for sale or sold by Defendants as being those of Plaintiff, or in any way endorsed by Plaintiff and from offering such goods in commerce;

h. otherwise unfairly competing with Plaintiff;

i. using 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

which are visible to a computer user or serves to direct computer searches to e-commerce stores or seller names, registered by, owned, or operated by Defendants, and

j. effecting assignments or transfers, forming new entities or associations or utilizing any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth above.

(2) **Additional Equitable Relief**

a. In order to give practical effect to the Permanent Injunction, and upon Plaintiff's request, the e-commerce stores under their seller identification names identified on Schedule "A" hereto (the "E-commerce Store Names") are hereby ordered to be immediately transferred by the corresponding Defendants also identified on Schedule "A" hereto, their assignees and/or successors in interest or title, and the Registrars to Plaintiff's control. To the extent the current Registrars do not facilitate the transfer of the E-commerce Store Names to Plaintiff's control **within five (5) days of receipt** of this Judgment, upon Plaintiff's request, those corresponding Defendants and the top level domain ("TLD") Registry for each of the E-commerce Store Names, or their administrators, including backend registry operators or administrators, shall, **within thirty (30) days**, (i) change the Registrar of Record for the E-commerce Store Names to a Registrar of Plaintiff's choosing, and that Registrar shall transfer the E-commerce Store Names to Plaintiff, or (ii) place the E-commerce Store Names on Registry Hold status for the life of the current registration, thus removing them from the TLD zone files maintained by the Registries which link the E-commerce Store Names to the IP addresses where the associated websites are hosted;

b. Plaintiff may serve this injunction on any e-mail service provider with a request that the service provider permanently suspend the e-mail addresses which are or have been

used by Defendants in connection with Defendants' promotion, offering for sale, and/or sale of goods using counterfeits and/or infringements of the Plaintiff's Marks;

c. Plaintiff may serve this injunction on the e-commerce store's registrar(s) and/or the privacy protection service(s) for the E-commerce Store Names to disclose to Plaintiff the true identities and contact information for the registrants of the E-commerce Store Names;

d. Plaintiff may serve this injunction on any Internet search engines with a request that they permanently disable, deindex or delist any specific URLs identified by Plaintiff, based upon the Defendants' unlawful activities being conducted via the E-commerce Store Names as a whole and via the URLs identified by the Plaintiff;

e. Defendants, their agent(s) or assign(s), shall assign in writing all rights, title, and interest, to their E-commerce Store Name(s) to Plaintiff. If Defendants fail to make such an assignment **within five (5) days of receipt** of this Order, the Court shall order the act to be done by another person appointed by the Court at Defendants' expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a); and

f. Defendants, their agent(s) or assign(s), shall instruct in writing all search engines to permanently delist or deindex the E-commerce Store Name(s). If Defendants fail to make such a written instruction **within five (5) days of receipt** of this Order, the Court shall order the act to be done by another person appointed by the Court at Defendants' expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a).

(3) Statutory damages in favor of Plaintiff pursuant to 15 U.S.C. § 1117(c) are determined to be \$1,000,000.00 against each Defendant, for which sum let execution issue, based upon the Court's finding that each Defendant infringed at least one trademark on one type of good. The Court has considered both the willfulness of each Defendant's conduct and the deterrent value

of the award imposed, and the award falls within the permissible statutory range under 15 U.S.C. § 1117(c).

(4) Interest from the date this action was filed shall accrue at the legal rate. *See* 28 U.S.C. § 1961.

(5) The Clerk is directed to **RELEASE** the bond posted by Plaintiff, [ECF No. 14], in the amount of Ten Thousand Dollars (\$10,000.00).

(6) The Court **RETAINS** jurisdiction to enforce the Final Judgment and Permanent Injunction.

(7) Any pending motions are **DENIED** as moot.

**DONE AND ORDERED** in Miami, Florida, this \_\_\_\_ day of \_\_\_\_\_, 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	watchgood@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	hotwatchsreplica.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
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