

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 24-cv-24178-JB

TIFFANY (NJ) LLC,

Plaintiff,

v.

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

Defendants.

/

**SEALED ORDER ON PLAINTIFF’S *EX PARTE*  
APPLICATION FOR ENTRY OF TEMPORARY RESTRAINING  
ORDER AND ORDER RESTRAINING TRANSFER OF ASSETS**

**THIS CAUSE** is before the Court on the *Ex Parte* Application for Entry of Temporary Restraining Order and Order Restraining Transfer of Assets (the “Application”) filed by Plaintiff, Tiffany (NJ) LLC (“Plaintiff”), under 15 U.S.C. §1116, Federal Rule of Civil Procedure 65, and The All Writs Act, 28 U.S.C. §1651(a), and this Court’s inherent authority. ECF No. [6].

Defendants are the individuals, business entities, and unincorporated associations identified in Schedule “A” to the Complaint (the “Defendants”). Plaintiff asks the Court to enter (1) a temporary restraining order against Defendants, and (2) an order restraining the financial accounts used by Defendants. Upon due consideration of the Application, the pertinent portions of the record, the relevant

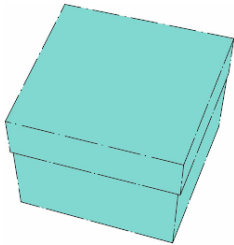

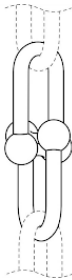

authorities, and for the reasons set forth herein, the Application is hereby **GRANTED**.

**I. FACTUAL BACKGROUND**

The following factual background is taken from Plaintiff's Complaint, ECF No. [1], the Application, and supporting evidentiary submissions and exhibits.

Plaintiff claims it is the owner of all rights in and to the following trademarks, which are valid and registered on the Principal Register of the United States Patent and Trademark Office (the "Tiffany Marks"):

| <b>Trademark</b>        | <b>Registration Number</b> | <b>Registration Date</b> | <b>Class / Goods</b>   |
|-------------------------|----------------------------|--------------------------|--|
| TIFFANY & CO.           | 0,023,572                  | September 5, 1893        | IC 6, 14 – Bronzes, Silver and Plated Ware, and Ornamental Articles in Metal   |
| <i>TIFFANY &amp; CO</i> | 0,023,573                  | September 5, 1893        | IC 14 – Jewelry and Watches.   |
| TIFFANY                 | 0,133,063                  | July 6, 1920             | IC 14 – Jewelry for Personal Wear, Not Including Watches; and Flat and Hollow Ware Made of or Plated with Precious Metal.  |
| TIFFANY & CO.           | 1,228,189                  | February 22, 1983        | IC 14 – Decorative Art Objects Made in Whole or in Part of Precious or Semi-Precious Metals-Namely, Figurines, Boxes, Bowls, Trays, Jewelry, Metal Wares Made in Whole or in Part of Precious or Semi-Precious Metals-Namely, Business Card Cases, Candelabras, Candlesticks, Cigar and Cigarette Boxes, Napkin Rings, and Bookmarks, Semi-Precious Stones, Natural and Cultured Pearls. |

|   |           |                   |  |
|---|-----------|-------------------|--|
| TIFFANY   | 1,228,409 | February 22, 1983 | IC 14 – Decorative Art Objects Made in Whole or in Part of Precious or Semi-Precious Metals- Namely, Figurines, Boxes, Bowls, Trays, Jewelry, Semi-Precious Stones, and Natural and Cultured Pearls. |
| T & CO.   | 1,669,365 | December 24, 1991 | IC 14 – All Types of Jewelry Made of, or in Part of, Precious Metals and/or with Precious or Semi-Precious Stones.   |
|    | 2,359,351 | June 20, 2000     | IC 14 – Jewelry; watches and clocks; decorative art objects made in whole or in part of precious metals and their alloys, namely, figurines, boxes.<br><br>IC 21 – Decorative boxes, boxes.          |
| 1837  | 4,154,018 | June 05, 2012     | IC 14 – Jewelry; cufflinks; key rings of precious metal  |
|  | 5,176,498 | April 4, 2017     | IC 14 – Jewelry  |
|  | 7,185,896 | October 10, 2023  | IC 14 – Jewelry  |
|  | 7,185,897 | October 10, 2023  | IC 14 – Necklaces  |

ECF No. [6-1] at ¶ 4; *see also* ECF No. [1-2]. According to Plaintiff, the Tiffany Marks are used in connection with the manufacture and distribution of high-quality goods in the categories identified above. ECF No. [6-1] at ¶¶ 4–5.

Plaintiff alleges that Defendants, by operating the Internet based e-commerce stores under the seller names listed on Schedule “A” hereto (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 Tiffany Marks. ECF Nos. [6-1] at ¶¶ 9–13; [6-2] at ¶ 2; [6-3] at ¶ 4.

Although each Defendant may not copy and infringe each Tiffany Mark for each category of goods protected, Plaintiff claims it has submitted sufficient evidence showing that each Defendant has infringed, at least, one or more of the Tiffany Marks. ECF No. [6-1] at ¶¶ 4, 9–13. According to Plaintiff, Defendants are not now, nor have they ever been, authorized or licensed to use, reproduce, or make counterfeits, reproductions, or colorable imitations of the Tiffany Marks. ECF No. [6-1] at ¶¶ 9, 12-13.

Plaintiff further claims it retained Invisible Inc, 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 document the available payment account data for receipt of funds paid to Defendants for the sale of such counterfeit branded products through the E-commerce Store Names. ECF Nos. [6-1] at ¶ 10; [6-2] at ¶ 2; [6-3] at ¶ 3.

Specifically, Invisible Inc accessed the e-commerce stores operating under Defendants' E-commerce Store Names and placed orders from each Defendant for the purchase of various products, all bearing and/or using counterfeits of, at least, one of Plaintiff's trademarks<sup>1</sup> at issue in this action, and requested the products be shipped to an address in the Southern District of Florida. ECF No. [6-3] at ¶ 4. Each order was processed entirely online and following the submission of the orders, Invisible Inc documented information for finalizing payment for the products ordered from Defendants to their respective financial account as identified on Schedule "A." ECF No. [6-3] at ¶ 4, n.4; ECF No. [6-2] at ¶¶ 2, 5, n.2. At the conclusion of the process, the detailed web pages and images of the various products bearing Plaintiff's trademarks offered for sale and ordered via Defendants' E-commerce Store Names, together with photographs of some of the products received, were sent to Plaintiff's representative for inspection. ECF Nos. [6-1] at ¶11; [6-2] at ¶ 2; [6-3] at ¶ 4.

Plaintiff claims it reviewed the various branded products offered for sale and ordered by Invisible Inc by reviewing the Internet based e-commerce stores operating under each of the E-commerce Store Names or the detailed web page captures thereof, and determined the products were non-genuine, unauthorized versions of Plaintiff's products. ECF No. [6-1] at ¶¶ 10–13.

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<sup>1</sup> Plaintiff submitted evidence that certain Defendants blurred-out and/or concealed the images of Plaintiff's trademarks on products being offered for sale via Defendants' respective e-commerce stores. However, Invisible Inc verified that each product did, in fact, bear one or more of the Tiffany Marks in their entirety. (See ECF No. [6-3] at ¶ 4 n.3.)

On October 28, 2024, Plaintiff filed its Complaint against Defendants for federal trademark counterfeiting and infringement, false designation of origin, common law unfair competition, and common law trademark infringement. ECF No. [1]. On October 30, 2024, Plaintiff filed the instant Application. ECF No. [6].

## **II. LEGAL STANDARD**

To obtain a temporary restraining order, 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).

Additionally, Federal Rule of Civil Procedure 65 provides that 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. Brotherhood of Teamsters & Auto Truck Drivers Local No. 70 of Alameda Cnty.*, 415 U.S. 423, 439 (1974).

### **III. CONCLUSIONS OF LAW**

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

Plaintiff has a strong probability of proving at trial that consumers are likely to be confused by Defendants' advertisement, promotion, sale, offer for sale, or distribution of goods bearing and/or using counterfeits, reproductions, or colorable imitations of the Tiffany 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 Tiffany Marks, and that the infringement of the Tiffany Marks will likely cause Plaintiff to suffer immediate and irreparable injury if a Temporary Restraining Order is not granted.

The following specific facts, as set forth in Plaintiff's Complaint, the Application, and accompanying declarations, demonstrate that immediate and irreparable loss, damage, and injury will result to Plaintiff and consumers before Defendants can be heard in opposition unless Plaintiff's request for *ex parte* relief is granted: (1) Defendants own or control 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; (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; and (3) there is good cause to believe that if Plaintiff proceeds to put Defendants on notice of this

Application, Defendants can easily and quickly change the ownership or modify e-commerce store data and private messaging account data and content, change payment accounts, redirect consumer traffic to other seller names and private messaging accounts, and transfer assets and ownership of the E-commerce Store Names, thereby thwarting Plaintiff's ability to obtain meaningful relief.

The potential harm to 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. The public interest favors issuance of the temporary restraining order to protect Plaintiff's trademark interests and protect the public from being defrauded by the illegal sale of counterfeit goods. Further, under Section 1125 of Title 15, United States Code and Section 1117(a) of Title 15, United States Code, 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 Tiffany 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.'")).

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. v. Sunrise Intern. Trading Inc.*, 51 F.3d 982, 987 (11th Cir. 1995) (citing *FTC v. U.S. Oil & Gas Corp.*, 748 F.2d 1431, 1433–34 (11th Cir. 1984), *abrogated on other grounds by AMG Cap. Mgmt., LLC v. FTC*, 593 U.S. 67, 70 (2021)).

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

Accordingly, upon review of Plaintiff’s Complaint, Application, and supporting evidentiary submissions, 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 Application, ECF No. [6], is **GRANTED**, according to the terms set forth below:

### **TEMPORARY RESTRAINING ORDER**

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 Tiffany 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 the Plaintiff, bearing and/or using the Tiffany 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 Tiffany 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 Tiffany 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 the use of the Tiffany 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, Defendants and all financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to, PayPal, Inc. ("PayPal") and Stripe, Inc. ("Stripe"), and their related companies and affiliates (each, a "Third Party," and collectively, the "Third Parties") 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, payees, merchant identification numbers, financial accounts, e-mail addresses, and/or telephone contact numbers identified on Schedule "A" hereto, as well as any other related accounts of the same customer(s); (ii) identify all other accounts which transfer funds

into the same financial institution account(s) 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. By no later than **five days** prior to the preliminary injunction hearing set herein, Plaintiff shall file a notice (the unredacted versions of which may be submitted under seal and remain under permanent seal and a redacted version of those records on the docket) advising the Court of the total amount of funds so restrained from each of the Defendants.

7. Upon receipt of notice of this Order, Defendants and all Third Parties, including but not limited to, PayPal and Stripe, 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 Third Party, including but not limited to, PayPal and Stripe, 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. By no later than **five days** prior to the preliminary injunction hearing set herein, Plaintiff shall file a notice (the unredacted versions of which may be submitted under seal and remain under permanent seal and a redacted version of those records on the docket) attaching a copy of all data received pursuant to this paragraph.

8. Any Defendant or Third Party 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, and any other seller identification names, e-commerce stores, or financial accounts which are being used by Defendants for the purpose of counterfeiting the Tiffany 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 name 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 for **fourteen days** from the date of its entry unless extended for good cause.

### **BOND TO BE POSTED**

12. Pursuant to Section 1116(d)(5)(D) of Title 15, United States Code, and Federal Rule of Civil Procedure 65(c), by no later than **five business days** from the date of this Order, 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. Plaintiff shall file a notice with the Court to confirm its compliance with this provision.

### **PRELIMINARY INJUNCTION HEARING**

13. An in-person hearing is set before this Court at the Wilkie D. Ferguson Jr. Courthouse, Courtroom 11-4, 400 North Miami Avenue, Miami, Florida 331282, on \_\_\_\_\_, **2024 at \_\_:\_\_ .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.

14. After Plaintiff's counsel has received confirmation from the financial institutions regarding the funds restrained as directed herein, Plaintiff shall serve copies of the Complaint, Application, and this Order, on each Defendant e-mail and/or online contact form or other means of electronic contact provided on the e-commerce stores operating under the respective E-commerce Store Names, or by providing a copy of this Order by e-mail to the registrar of record or marketplace platform 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.

15. Plaintiff shall post copies of the Complaint, the Application, this Order, as well as all other documents filed in this action on the website located at <http://servingnotice.com/TB29mE/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 Defendants by regularly updating the website located at <http://servingnotice.com/TB29mE/index.html>, or by other means reasonably calculated to give notice which is permitted by the Court.

16. 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 Third Parties, including but not limited to, PayPal and Stripe, 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 Defendants' respective E-commerce Store Names.

17. Unless stated otherwise herein, Defendants shall have five business days to comply with this Temporary Restraining Order following notice.

18. Any response or opposition to Plaintiff's Motion for Preliminary Injunction in ECF No. [6] must be filed and served on Plaintiff's counsel by no later than **forty-eight hours** prior to the preliminary injunction hearing set herein.

19. Plaintiff shall file any reply memorandum on or before **twenty-four hours** prior to the preliminary injunction hearing set herein.

20. The above dates may be revised upon stipulation by all parties and approval of this Court.

21. 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 Section 1116(d) of Title 15, United States Code, Section 502 of Title 17, United States Code, Section 382 of Title 35, United States Code, Federal Rule of Civil Procedure 65, The All Writs Act, Section 1651(a) of Title 28, United States Code, and this Court's inherent authority.

22. Plaintiff shall immediately file a motion to unseal the Application, ECF No. [6], once service has been effectuated upon all Defendants.

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

**DONE AND ORDERED** in Miami, Florida this \_\_\_\_ day of \_\_\_\_\_, 2024.

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**JACQUELINE BECERRA**  
**UNITED STATES DISTRICT JUDGE**

Copies provided to:  
Counsel of Record



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

| Def. No. | Defendant / E-commerce Store Name | PayPal Payee                  | Merchant ID / Transaction Info | PayPal E-mail        | Additional Means of Contact                            |
|----------|-----------------------------------|-------------------------------|--------------------------------|----------------------|--|
| 1        | ccfashionjewelry.com              | 深圳市朗克思照明有限公司                  | K9VDCP8BRGVC4                  | xxxy412308@gmail.com | cc@ccfashionjewelry.com<br>info@ccfashionjewelry.com   |
| 2        | blingblings.es                    | Blingblings                   | LL9GLNQEUE6QNE                 |                      | oliva.sunny.song@gmail.com<br>service@blingblings.es   |
| 3        | classport.shop                    | 海口龙华辉宏峻百货店                    | ZTSS2YX9SQSV8                  |                      | service@classport.shop<br>Jessport@ruralshoes.com      |
| 4        | cocoshoes.top                     | 南宁市君朗日用百货有限公司                 | F96QJFSQVMF2J                  | 17689611506@163.com  | cocoshoes2011@gmail.com<br>WhatsApp: +852 6432 9578    |
| 5        | correctkickz.com                  |                               |                                | 76398812@qq.com      | correctkickz.cc@gmail.com<br>WhatsApp: +852 5614 0114  |
| 6        | eleger.co                         |                               | 56P3F7YRER8Q8<br>T6XZ4CPL3PDH8 |                      | support@eleger.co                                      |
| 7        | eukick.com                        | 海口美兰崇泊姆电子商务工作室                | 5X9H6C3YAEBXJ                  |                      | service@runningpro.shop<br>WhatsApp: +86 173 2700 2347 |
| 8        | evelynsneaker.com                 |                               |                                | 1013573859@qq.com    | evasneaker@gmail.com<br>WhatsApp: +86 181 0058 6611    |
| 9        | fcmg-sales.com                    | 莆田市湄洲湾北岸经济开发区忠门湄里啪啦服饰店(个体工商户) | KY7YKZAYKJ9ZS                  |                      | zzy925520@gmail.com                                    |
| 9        | saleluxurycn.com                  | 莆田市湄洲湾北岸经济开发区忠门湄里啪啦服饰店(个体工商户) | KY7YKZAYKJ9ZS                  |                      | zzy925520@gmail.com<br>r4c.lhikdl3t@gmail.com          |

|    |  |                                  |  |                                       |  |
|----|--|----------------------------------|--|---------------------------------------|--|
| 10 | fossilry.cc  |                                  | QH4F7KX2378GW  | yangbing19988dkh@163.com              | fossilry@ontlook.net   |
| 11 | getreadys.org  |                                  |  | wzb5556688@163.com                    | cocosneakers@outlook.com<br>WhatsApp: +86 180 5957 6801                                      |
| 12 | greenutilityltd.online   |                                  | XJMYYY3S4XM8N  |                                       | support@greenutilityltd.online   |
| 13 | jewelrybuild.com   | CHAI TZU - CHUN<br>@jewelrybuild | 97BNUPBPH42EL  |                                       | aaabbbccc330626@gmail.com  |
| 14 | Jinyi Shoes retail wholesale<br>a.k.a.<br>+8619359440554<br>a.k.a.<br>俊弟aj LJR版 (本地支持送货上门) |                                  |  | dgfswaf@163.com<br>zwyppaypal@163.com | WhatsApp: +86 193 5944 0554  |
| 15 | jwfancy.com  |                                  | 6CLPQVLVPRCKJ  |                                       | support@jwfancy.com<br>MANHSONLE@GMAIL.COM   |
| 16 | kaideck.shop   | Unlock your imagination          | YW7CFDQUQRZ4L  |                                       | SERVICE@KAIDECK.SHOP   |
| 17 | kailin44088<br>a.k.a.<br>luxury goods  | 苏 炽权<br>@6880887                 | T885RJF75US22  | 2687378995@qq.com                     | 469011636@qq.com<br>WhatsApp: +86 183 1280 1720  |
| 18 | kickspk.com  | Unlock your imagination          | JU8DSXVDNNM96  |                                       | SUPPORT@KICKSPK.COM<br>support@kickssu.com   |
| 18 | kickssu.org  | Unlock your imagination          | JU8DSXVDNNM96  |                                       | SUPPORT@KICKSSU.ORG<br>support@kickssu.com   |
| 19 | kolobag.com  | Online Shop                      | D74KA3BGHWNQE  |                                       | info@spumall.com<br>info@bxsale.com  |
| 20 | koolmaker.com  | Stripe Payment                   | SNOWTO.STO*<br>KOOLMAKER<br>Transaction Date: July 22, 2024<br>Posted Date: July 23, 2024<br>Category: Merchandise & inventory |                                       | support@koolmaker.com<br>6F7C571E6DC5414096967<br>A6AD47644EE.PROTECT@WITHHELDFORPRIVACY.COM |

|    |  |   |                                    |                          |   |
|----|--|---|------------------------------------|--------------------------|---|
| 21 | kw-store.top   |   | 8ERX395NJJ3GG                      | eryuedeqing@outlook.com  | uuwa556@gmail.com<br>WhatsApp: +85253194272   |
| 22 | lalsoft.com<br>a.k.a.<br>fspbo.shop<br>a.k.a.<br>kegegegghh.shop |   | ZDW2EA7MN2YQC<br><br>ZK22QSWY4NR4W |                          | contacts@lalsoft.com<br>BELKAABSOLUTLYMAN<br>4@GMAIL.COM  |
| 23 | luxere.top   | BAGS<br>LUXE<br>@BAGSLU<br>XE                         | GRWX9K4VBMGZN                      |                          | piyi2020@gmail.com<br>info@luxere.top   |
| 24 | maikesneakers111.com   |   |                                    | ZhangJinYu202424@163.com | zhusen19780926@gmail.com<br>Annareps2023@gmail.com<br>zhusen780926@gmail.com<br><br>WhatsApp: +86 138 6099 5961 |
| 25 | matoyli.com  |   | AVT9DA643UDUU                      |                          | support@matoyli.com<br>AB28F948E2C64911B30D<br>B106DA340C57.PROTECT<br>@WITHHELDFORPRIVACY.COM                  |
| 25 | testegrila.com   |   | AVT9DA643UDUU                      |                          | support@testegrila.com<br>Contact@sample.com<br>Support@sample.com<br>contact@yourstore.com                     |
| 26 | monicasneaker.im   |   |                                    | choice409@126.com        | monicasneaker@gmail.com<br><br>WhatsApp: +86 183 9600 1806  |
| 27 | niosneaker.com   | Wear your<br>personality,<br>a new<br>summer<br>style | AJARX6JZSMYRN                      |                          | niosneaker@gmail.com  |
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| 29 | oldsnkrs.shop  | 光远 赵  |                                    | jjligimvgj92@hotmail.com | onlykickz0706@gmail.com<br>Godky@163.com<br><br>WhatsApp: +86 186 4960 5584                                     |

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| 32 | sneakershop.ww                            | 伟岚 钱 @WEILAN QIAN                | CSJWGLWPXJP2G | 519097741@qq.com             | WhatsApp: +86 159 8011 9208  |
| 33 | sneakerssport789                          |                                  |               | qiuxia96@163.com             | WhatsApp: +44 7473 486405  |
| 34 | snkrsclub.cc                              |                                  | G475D5VGJX3U4 |                              | SUPPORT@SNKRSCLUB.CC<br>support@snkrsclub.com<br>snkrsclub-alan@outlook.com<br>PWP-CE5127C33DCB144E78D80A5022CD7CC7@PRIVACYGUARDIAN.ORG<br><br>WhatsApp: +86 153 3001 0786 |
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| 38 | xsir.product<br>a.k.a.<br>welcome to xsir |                                  |               | zhuchuanzheng203@outlook.com | WhatsApp: +86 181 5940 2993  |
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