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. <u>FACTUAL BACKGROUND</u>

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"):

Trademark	Registrati on Number	Registration Date	Class / Goods	
TIFFANY & CO.	0,023,572	September 5, 1893	IC 6, 14 – Bronzes, Silver and Plated Ware, and Ornamental Articles in Metal	
TIFFANY & CO	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 Object Made in Whole or in Part of Precious or Semi-Precious Metals Namely, Figurines, Boxes, Bowle Trays, Jewelry, Semi-Precious Stones, and Natural and Culture 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 mad in whole or in part of preciou metals and their alloys, namely figurines, boxes.	
			IC 21 – Decorative boxes, boxes.	
1837	4,154,018	June 05, 2012	IC 14 – Jewelry; cufflinks; key rings of precious metal	
1	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 trademarks¹ 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.

¹ 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 ecommerce 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 ecommerce 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 ecommerce 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 **Thursday, November 21, 2024 at 2:00 p.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** regularly website by updating the located at http://servingnotice.com/TB29mE/index.html, or by other means 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.

Case 1:24-cv-24178-JB Document 9 *SEALED* Entered on FLSD Docket 11/08/2024 Page 16 of 20

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 7th day of November, 2024.

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	xxy412308@gmail.co m	cc@ccfashionjewelry.com info@ccfashionjewelry.com
2	blingblings.es	Blingblings	LL9GLNQEU6QN E		oliva.sunny.song@gmail.co m service@blingblings.es
3	classport.shop	海口龙华辉 宏峻百货店	ZTSS2YX9SQSV8		service@classport.shop Jessport@ruralshoes.com
4	cocoshoes.top	南宁市君朗 日用百货有 限公司	F96QJFSQVMF2J	17689611506@163.co m	cocoshoes2011@gmail.com WhatsApp: +852 6432 9578
5	correctkickz.com			76398812@qq.com	correctkickz.cc@gmail.com WhatsApp: +852 5614 0114
6	eleger.co		56P3F7YRER8Q8 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 WhatsApp: +86 173 2700 2347
8	evelynsneaker.com			1013573859@qq.com	evasneaker@gmail.com WhatsApp: +86 181 0058 6611
9	fcmg-sales.com	莆田市湄洲 湾北岸经济 开发区中驻 平里信(个体工 商户) 莆田市湄洲 湾北岸经济 开发区忠门	KY7YKZAYKJ9ZS		zzy925520@gmail.com
9	saleluxurycn.com	中型中的中部 中国	KY7YKZAYKJ9ZS		zzy925520@gmail.com r4c.lhikdl3t@gmail.com

Case 1:24-cv-24178-JB Document 9 *SEALED* Entered on FLSD Docket 11/08/2024 Page 18 of 20

1	I	I	1	1	
10	<i>c</i> :1		OHAETIVOOTOON	yangbing19988dkh@1	
10	fossilry.cc		QH4F7KX2378GW	63.com	fossilry@ontlook.net
					cocosneakers@outlook.com
				wzb5556688@163.co	WhatsApp: +86 180 5957
11	getreadys.org			m	6801
					support@greenutilityltd.onl
12	greenutilityltd.online		XJMYYY3S4XM8N		ine
		CHAI TZU - CHUN			
		@jewelrybui			aaabbbccc330626@gmail.co
13	jewelrybuild.com	ld	97BNUPBPH42EL		m
	Jinyi Shoes retail				
	wholesale				
	a.k.a.				
	+8619359440554 a.k.a.				
	俊弟aj LJR版 (本地			dgfswaf@163.com	WhatsApp: +86 193 5944
14	支持送货上门)			zwypaypal@163.com	0554
					support@jwfancy.com MANHSONLE@GMAIL.C
15	jwfancy.com		6CLPQVLVPRCKJ		OM
		Unlock your	YW7CFDQUQRZ4		SERVICE@KAIDECK.SHO
16	kaideck.shop	imagination	L		P
					469011636@qq.com
	kailin44088				
1.77	a.k.a.	苏 炽权	MOORD IDEELIGOO	000000000000000000000000000000000000000	WhatsApp: +86 183 1280
17	luxury goods	@6880887	T885RJF75US22	2687378995@qq.com	1720
		Unlock your			SUPPORT@KICKSPK.CO M
18	kickspk.com	imagination	JU8DSXVDNNM96		support@kickssu.com
		-			SUPPORT@KICKSSU.OR
		Unlock your			G
18	kickssu.org	imagination	JU8DSXVDNNM96		support@kickssu.com
10	la laba a ve ve	Online	D74KA3BGHWNQ		info@spumall.com info@bxsale.com
19	kolobag.com	Shop	E		info@bxsale.com
			SNOWTO.STO*		
			KOOLMAKER		
			Transaction Date:		
			July 22, 2024 Posted Date: July		support@koolmaker.com
			23, 2024		6F7C571E6DC5414096967
			Category:		A6AD47644EE.PROTECT
00	leaderal	Stripe	Merchandise &		@WITHHELDFORPRIVAC
20	koolmaker.com	Payment	inventory		Y.COM

Case 1:24-cv-24178-JB Document 9 *SEALED* Entered on FLSD Docket 11/08/2024 Page 19 of 20

Ī	I	İ	I	I	l I
				eryuedeging@outlook.	uuwa556@gmail.com
21	kw-store.top		8ERX395NJJ3GG	com	WhatsApp: +85253194272
	lalsoft.com		ZDW2EA7MN2YQ C		
	a.k.a. fspbo.shop				contacts@lalsoft.com
	a.k.a.				BELKAABSOLUTLYMAN
22	kegegeggghh.shop	BAGS	ZK22QSWY4NR4W		4@GMAIL.COM
		LUXE			
23	luxere.top	@BAGSLU XE	GRWX9K4VBMGZ N		piyi2020@gmail.com info@luxere.top
	rancic.cop	TIE .			
					zhusen19780926@gmail.co m
					Annareps2023@gmail.com
					zhusen780926@gmail.com
24	maikesneakers111.co			ZhangJinYu202424@ 163.com	WhatsApp: +86 138 6099 5961
	III			165.com	support@matoyli.com
					AB28F948E2C64911B30D B106DA340C57.PROTECT
					@WITHHELDFORPRIVAC
25	matoyli.com		AVT9DA643UDUU		Y.COM
					support@testegrila.com Contact@sample.com
					Support@sample.com
25	testegrila.com		AVT9DA643UDUU		contact@yourstore.com
					monicasneaker@gmail.com
					WhatsApp: +86 183 9600
26	monicasneaker.im	Wear your		choice409@126.com	1806
		personality,			
		a new summer			
27	niosneaker.com	style	AJARX6JZSMYRN		niosneaker@gmail.com
		盖州顺百商		15659915689@163.co	
28	obosneaker.com	贸有限公司	T7SE9R8HVVFQA	m	onebyonemalls@gmail.com
					onlykickz0706@gmail.com Godky@163.com
29	oldsnkrs.shop	光远 赵		jjligimvgj92@hotmail. com	WhatsApp: +86 186 4960 5584

Case 1:24-cv-24178-JB Document 9 *SEALED* Entered on FLSD Docket 11/08/2024 Page 20 of 20

Î	I	I	1	I	1
		GREEN E-			csservice@splendorxa-
		2FOUR			live.com
		PRIVATE			customercs@visable-
30	persting.live	LIMITED	LHL3Z7HRGBAGA		online.com
		Guangzhou			
		Share			1: 010040 :1
31	poposhoes.top	Clothing Co.,Ltd	XSEJ6A4ZWB4M8		liu31004@gmail.com info@poposhoes.top
91	poposnoes.top	伟岚 钱	ASEJOA4ZWD4WO		imo@poposnoes.top
		@WEILAN			WhatsApp: +86 159 8011
32	sneakershop.ww	QIAN	CSJWGLWPXJP2G	519097741@qq.com	9208
	Silver Silver W	qui	0.00 ((0.01 () 1110 1 2 0	o 10 00 () 11 O qqicom	WhatsApp: +44 7473
33	sneakerssport789			giuxia96@163.com	WhatsApp: +44 7475 486405
- 55	sileakerssport 103			qiuxiaoo@10o.com	SUPPORT@SNKRSCLUB.
					CC
					support@snkrsclub.com
					snkrsclub-
					alan@outlook.com
					PWP-
					CE5127C33DCB144E78D8
					0A5022CD7CC7@PRIVAC YGUARDIAN.ORG
					IGUARDIAN.ORG
					WhatsApp: +86 153 3001
34	snkrsclub.cc		G475D5VGJX3U4		0786
				topfactory2166@outlo	WhatsApp: +86 166 2166
35	topfactory2166			ok.com	1166
	,,,,,,,, .	Unlock your		0	SERVICE@USASIHA.SHO
36	usasiha.shop	imagination	662WL4LGHA7ME		P
30	ававина.виор	上海斗彩信	002 WEIGHT WIE		
		息科技有限			hello@worlsoccer.com
37		公司	DI UVERDODEOEM	aidfan@hatmail.com	support@worlsoccer.com
31	worlsoccer.com	五山	DLHY3FPQP3Q3N	aidfen@hotmail.com	8377557@gmail.com
	xsir.product				
	a.k.a.			zhuchuanzheng203@	WhatsApp: +86 181 5940
38	welcome to xsir			outlook.com	2993
	zzmoonz.com	zzmoonzsho			
	a.k.a.	p@gmail.co			
39	zzmoonz.shop	m	P72UBQDS26Y6U		zzmoonzshop@gmail.com