

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 24-24178-CIV-BECERRA**

TIFFANY (NJ) LLC,

Plaintiff,

vs.

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

Defendants.

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**DECLARATION OF KATHLEEN BURNS IN SUPPORT OF  
PLAINTIFF’S NOTICE OF IDENTIFICATION OF ADDITIONAL  
FINANCIAL ACCOUNT USED BY DEFENDANT NUMBER 27**

I, Kathleen Burns, state and declare as follows:

1. I am over 18 years of age and have personal knowledge of the truth of the matters set forth herein. I submit this Declaration in support of Plaintiff’s Notice of Identification of Additional Financial Account Used by Defendant Number 27. I am personally knowledgeable of the matters set forth in this Declaration and, if called upon to do so, I could and would competently testify to the following facts set forth below.

2. I am president of Invisible Inc, a licensed private investigative firm, and I have been an investigator since 2012.

3. Counsel for Plaintiff, Tiffany (NJ) LLC (“Plaintiff” or “Tiffany”), retained my firm to investigate and document the ongoing sale of counterfeit versions of Plaintiff’s products by Defendants, the Individuals, Business Entities, and Unincorporated Associations Identified on Schedule “A” attached to Plaintiff’s Application for Temporary Restraining Order (collectively

“Defendants”) and to determine payment account data for receipt of funds paid to Defendants for the sale of counterfeit Tiffany-branded merchandise.

4. On October 30, 2024, Plaintiff filed its *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets (the “Application for Temporary Restraining Order”) [ECF No. 6]. I hereby incorporate by reference all factual allegations contained in my Declaration in Support of Plaintiff’s Application for Temporary Restraining Order [ECF No. 6-3].

5. Prior to filing this Declaration, my firm accessed the Internet based e-commerce store operating under the seller name for Defendant niosneaker.com (“Defendant Number 27”), identified on Schedule “A” hereto (the “E-commerce Store Name”). Upon accessing the e-commerce store, my firm was able to view products bearing and/or using Plaintiff’s trademarks, add a product to the online shopping cart, proceed to a point of checkout, and otherwise actively exchange data electronically with Defendant Number 27. My firm then placed an order from Defendant Number 27 via its E-commerce Store Name for the purchase of a product bearing one or more of Tiffany’s trademarks at issue in this action and requested the product be shipped to the Southern District of Florida. The order was processed entirely online and following the submission of the order, my firm finalized payment for the Tiffany branded product ordered from Defendant Number 27 via PayPal, Inc. (“PayPal”), to its newly identified financial account (the “Additional Financial Account”), identified on Schedule “A” hereto. True and correct copies of the web page captures reflecting Plaintiff’s branded products offered for sale and ordered via Defendant Number 27’s E-commerce Store Name, and the redacted copies of the order summary web pages, order confirmation, and newly identified PayPal account information are attached hereto as Composite Exhibit “1.”

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed On: 2024-12-30 in Maui, Hawaii.

*Kathleen Burns*

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Kathleen Burns

**SCHEDULE "A"**  
**DEFENDANTS BY E-COMMERCE STORE NAME AND**  
**ADDITIONAL FINANCIAL ACCOUNT**

<b>Def. No.</b>	<b>Defendant / E-commerce Store Name</b>	<b>PayPal Payee</b>	<b>Merchant ID / Transaction Info</b>	<b>PayPal E- mail</b>	<b>Additional Means of Contact Information</b>
27	niosneaker.com	厦门葡萄柚网络 科技有限公司 @Putau	Z29UC6FJG2 WWA	alexuping913 @gmail.com	niosneaker@gm ail.com stockxhouse@g mail.com