

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 22-62000-CIV-RUIZ**

FEDERATION OF THE SWISS  
WATCH INDUSTRY FH, *et al.*,

Plaintiffs,

vs.

BESTINTIMES.ME, *et al.*

Defendants.

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**DECLARATION OF DAVID LUTHER IN SUPPORT OF  
PLAINTIFFS' *EX PARTE* APPLICATION FOR ENTRY OF TEMPORARY  
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

I, David Luther, declare and state as follows:

1. I am over 18 years of age and have personal knowledge of the facts set forth herein. I make this Declaration, which is filed in support of Plaintiffs' *Ex Parte* Application for Entry of Temporary Restraining Order and Preliminary Injunction (the "Application for TRO") against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule "A" hereto (collectively "Defendants"). If called upon to do so, I could and would testify competently to the following facts set forth below.

2. I am employed by the Federation of the Swiss Watch Industry FH (the "Federation") as Head of Anti-Counterfeiting Department. The Federation is a private, non-profit trade association with its principal place of business located at CH-2501, Bienne, Switzerland. The Federation is the Swiss watch industry's leading trade association with nearly 500 members,

representing more than 90% of Swiss firms active in the production and sale of watches, clocks and components, including the Plaintiffs in this action.

3. The aim of the Federation is to contribute to the protection and development of the Swiss Watch Industry, to represent the latter to the Swiss authorities and to foreign and international authorities, and to defend on a judicial level, the interests of its members. In 1999, the Federation created the Anti-Counterfeiting Group, which was established to combat common sources of counterfeit goods which cause a common harm to its members' respective brands, individually and to the Swiss watch industry in its entirety, which results in further harm to each members' brand. Since 1999, the Federation through its anti-counterfeiting division, has worked with international law enforcement and government agencies to conduct raids and investigations of counterfeit operations, as well as raise public awareness of the issue of counterfeiting.

4. In my capacity as the Federation's Head of Anti-Counterfeiting Department, I am responsible, in part, for the Federation's and members of the Federation's, including Plaintiffs Audemars Piguet Holding SA's ("Audemars Piguet"), Breitling SA and Breitling U.S.A. Inc.'s (jointly, "Breitling"), Hublot SA, Genève's ("Hublot"), Omega SA's ("Omega"), Patek Philippe SA Geneve and Henri Stern Watch Agency, Inc.'s (jointly, "Patek Philippe"), Turlen Holding SA's ("Turlen"), and LVMH Swiss Manufactures SA's ("LVMH") (collectively "Plaintiffs") trademark and anti-counterfeiting efforts in connection with Internet related matters. As a result, I am fully familiar with the standards for certification established by Swiss law concerning the geographical origin and quality associated with Swiss watches and other horological instruments. I am also fully familiar with most aspects of the manufacture, sale, and distribution of the Federation members' genuine goods, and I have been trained to identify the distinctions between the Federation members', including Audemars Piguet's, Breitling's, Hublot's, Omega's, Patek

Philippe's, Turlen's, and LVMH's, genuine merchandise and non-genuine, counterfeit copies of the same.

**The Federation's Rights**

5. The Federation is the owner of the following certification trademarks, which are valid and registered on the Principal Register of the United States Patent and Trademark Office (the "Swiss Marks"):

<b>Trademark</b>	<b>Registration Number</b>	<b>Registration Date</b>	<b>Class / Goods</b>
SWISS MADE	3,038,819	January 10, 2006	IC A. Horological and chronometric instruments, namely, watches, clocks and their component parts and fittings thereof.
SWISS	3,047,277	January 24, 2006	IC A. Horological and chronometric instruments, namely, watches, clocks and their component parts and fittings thereof

The Swiss Marks are used in connection with watches and other horological instruments of Swiss origin. True and correct copies of the Certificates of Registration for the Swiss Marks are attached to the Complaint as Composite Exhibit "1."

6. The Federation is authorized by the Swiss government to enforce the standards established by Swiss law, "Swiss Federal Ordinance Governing the Use of the Appellation "Switzerland" or "Swiss" for Watches" (the "Ordinance"), concerning the geographical origin and quality associated with Swiss watches. Pursuant to the Ordinance establishing the Federation's standards for use of the Swiss Marks, a watch is Swiss if (1) its movement is Swiss; (2) its movement is cased up in Switzerland; and (3) the manufacturer carries out the final inspection in Switzerland. The Federation obtained the Swiss Marks as part of its efforts to protect the use the Swiss geographical designation for watches.

7. The Swiss Marks may be licensed by any watch manufacturer that complies with certification standards set forth by the Federation. Members of the Federation are automatically licensed to use the Swiss Marks because compliance with the Federation's standards is a required prerequisite for membership. Additionally, the Federation grants a license for use the Swiss Marks to non-members that manufacture watches in accordance with the Federation's certification standards for the use of the Swiss Marks.

8. The Swiss Marks have never been licensed to any of the Defendants in this matter.

9. The Swiss Marks have been extensively and continuously used in interstate commerce to identify watches and other horological instruments made in Switzerland in accordance with the Federation's standards for an extended period of time and serve as symbols of the Swiss watch manufacture industry's quality, reputation, and goodwill. The Swiss Marks have never been abandoned.

10. The Federation expends substantial resources developing and otherwise promoting the Swiss watch industry and ensuring watches and other horological instruments comply with the Federation's exacting certification standards in effort to guarantee that consumers can expect certain quality attributes from watches permitted to use the Swiss Marks.

11. As a result of the foregoing, the Swiss Marks have acquired fame in the consumer market for watches and other horological instruments.


12. The Swiss Marks are widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as identifiers of watches renowned for quality and excellence and originating from Switzerland.


13. The Federation carefully monitors and polices the use of the Swiss Marks.

14. The Swiss Marks are vital to the Federation, its members, and the Swiss watch manufacturing industry, and each suffer irreparable harm any time any third parties, including Defendants, sell counterfeit and infringing goods bearing an identical or substantially similar trademarks. Furthermore, through the sale counterfeit and infringing watches bearing the Swiss Marks and Plaintiffs' individual trademarks, Defendants are causing a common harm to Plaintiffs, namely diminution of the value associated with the overall market for genuine, certified Swiss made watches, resulting in further harm to each Plaintiff.

#### **Audemars Piguet's Rights**

15. Audemars Piguet is the owner of the following trademarks, which are valid and registered on the Principal Register of the United States Patent and Trademark Office (the "Audemars Piguet Marks"):

<b>Trademark</b>	<b>Registration Number</b>	<b>Registration Date</b>	<b>Class / Goods</b>
AUDEMARS PIGUET	913,296	June 8, 1971	IC 014. Watch straps, and jewelry.
Royal Oak	965,112	July 31, 1973	IC 014. Watches and clocks and parts thereof.
AUDEMARS PIGUET	1,591,934	April 17, 1990	IC 014. Watches, clocks, stop watches, time recorders, chronometers, chronographs, watch movements, and parts of all the foregoing.
	2,866,069	July 27, 2004	IC 014. Watches, wristwatches, [ chronometers, ] chronographs for use as watches, watch faces and cases, all the aforesaid goods being of Swiss origin.
AP AUDEMARS PIGUET	2,873,707	August 17, 2004	IC 014. Namely, watch cases, watch bands, watches, wristwatches.
ROYAL OAK	2,885,834	September 21, 2004	IC 014. Watch cases, watch bands, watches, wristwatches.

	3,480,826	May 20, 2008	IC 014. Cuff links, pendants; jewelry, bijouterie, timepieces, namely, watches, watch making materials, namely, alarm clocks, chronographs for use as timepieces and watches, dials for clock-and-watch making, boxes, caskets and cases for timepieces and jewelry.
<b>AP</b>	3,696,017	October 13, 2009	IC 014. Timepieces, namely, watches, wristwatches, clocks, chronographs for use as watches, watch straps; clock dials, watch cases.
<b>AP</b>	4,683,263	February 10, 2015	IC 014. Precious metals and alloys thereof and goods made of precious metals or coated therewith, namely, cufflinks, pendants, watches, alarm clocks, chronographs for use as timepieces and watches, dials for clock-and-watch making, boxes, caskets and cases for timepieces and jewelry, key rings of precious metal; jewelry; precious stones; timepieces and chronometric instruments.
<b>AUDEMARS PIGUET</b>	4,865,091	December 8, 2015	IC 014. Jewelry, timepieces and chronometric instruments.

The Audemars Piguet Marks are used in connection with the manufacture and distribution of high-quality watches and other horological instruments. True and correct copies of the Certificates of Registration for the Audemars Piguet Marks are attached to the Complaint as Composite Exhibit “2.”

16. Audemars Piguet, through and in connection with related companies, is engaged in the promotion, distribution, and sale of high-quality watches and other horological instruments in interstate commerce in the United States under the Audemars Piguet Marks.

17. The Audemars Piguet Marks have been extensively and continuously used in interstate commerce to identify and distinguish Audemars Piguet’s high-quality watches and other horological instruments for an extended period of time and serve as symbols of Audemars Piguet’s quality, reputation, and goodwill. The Audemars Piguet Marks have never been abandoned.

18. Genuine Audemars Piguet watches are marketed and sold at Audemars Piguet boutiques throughout the United States, and at prestigious retailers which are carefully selected and satisfy certain criteria.

19. During the time that Audemars Piguet watches have been sold in interstate commerce under the Audemars Piguet Marks, Audemars Piguet and related companies expended substantial resources developing, advertising, and promoting watches and other horological instruments under the Audemars Piguet Marks in magazines, newspapers, on the Internet and in other media worldwide, including the official Audemars Piguet website, [www.audemarspiguet.com](http://www.audemarspiguet.com). In recent years, Audemars Piguet's sales of watches and other horological instruments have been well into the many millions of dollars.

20. As a result of the foregoing, the Audemars Piguet Marks have acquired fame in the consumer market for a wide variety of products, including watches and other horological instruments.

21. The Audemars Piguet Marks are widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as identifiers of high-quality watches and other horological instruments.

22. Audemars Piguet carefully monitors and polices the use of the Audemars Piguet Marks and has never assigned or licensed the Audemars Piguet Marks to any Defendant in this matter.


23. Additionally, Audemars Piguet and related companies expend substantial resources ensuring that its genuine goods meet the exacting certification standards established by the Federation as part of an effort to guarantee that consumers can expect certain quality attributes

from watches, including components thereof, permitted to use the Swiss Marks in combination with the Audemars Piguet Marks.


24. The Audemars Piguet Marks are vital to Audemars Piguet’s business, as the Marks represent a significant value to the company and its associated image. Audemars Piguet suffers irreparable harm to its goodwill, as well as a direct monetary loss, any time any third parties, including Defendants, sell counterfeit and infringing goods bearing an identical or substantially similar trademarks.

**Breitling’s Rights**

25. Breitling is the owner of the following trademarks, which are valid and registered on the Principal Register of the United States Patent and Trademark Office (the “Breitling Marks”):

<b>Trademark</b>	<b>Registration Number</b>	<b>Registration Date</b>	<b>Class / Relevant Goods</b>
NAVITIMER	1,923,563	October 3, 1995	IC 014. Watches, clocks, and parts thereof [ ; jewelry; and precious gemstones ].
 BREITLING	2,352,162	May 23, 2000	IC 014. Horological instruments and chronometrical instruments, namely, watches, wrist-watches, straps for wrist-watches and watchcases, travel clocks, clocks, chronographs, chronometers.
AVENGER	2,572,724	May 28, 2002	IC 014. Horological instruments and chronometrical instruments, namely, watches, wrist-watches, [ straps for wrist-watches, watchcases, ] clocks and parts thereof, chronographs for use as watches and chronometers.
BREITLING	2,964,474	July 5, 2005	IC 014. Horological instruments and chronometrical instruments, namely, watches, wrist-watches straps for wrist-watches, watchcases, clocks, chronographs, chronometers, and parts thereof.



	3,377,049	February 5, 2008	IC 014. Timepieces and chronometric instruments, namely, watches, watchbands, chronometers, chronographs for use as watches.
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The Breitling Marks are used in connection with the manufacture and distribution of high-quality watches and other horological instruments. True and correct copies of the Certificates of Registration for the Breitling Marks are attached to the Complaint as Composite Exhibit “3.”

26. Breitling is engaged in the promotion, distribution, and sale of high-quality watches and other horological instruments in interstate commerce in the United States under the Breitling Marks.

27. The Breitling Marks have been extensively and continuously used in interstate commerce to identify and distinguish Breitling’s high-quality watches and other horological instruments for an extended period of time and serve as symbols of Breitling’s quality, reputation, and goodwill. The Breitling Marks have never been abandoned.

28. Genuine Breitling watches are marketed and sold at Breitling boutiques throughout the United States, and at prestigious retailers which are carefully selected and satisfy certain criteria.

29. During the time that Breitling watches have been sold in interstate commerce under the Breitling Marks, Breitling expended substantial resources developing, advertising, and promoting watches and other horological instruments under the Breitling Marks in magazines, newspapers, on the Internet and in other media worldwide, including the official Breitling website, [www.breitling.com](http://www.breitling.com). In the recent years, Breitling’s sales of watches and other horological instruments have been well into the many millions of dollars.

30. As a result of the foregoing, the Breitling Marks have acquired fame in the consumer market for a wide variety of products, including watches and other horological instruments.

31. The Breitling Marks are widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as identifiers of high-quality watches and other horological instruments.


32. Breitling carefully monitors and polices the use of the Breitling Marks and has never assigned or licensed the Breitling Marks to any Defendant in this matter.


33. Additionally, Breitling expends substantial resources ensuring that its genuine goods meet the exacting certification standards established by the Federation as part of an effort to guarantee that consumers can expect certain quality attributes from watches, including components thereof, permitted to use the Swiss Marks in combination with the Breitling Marks.

34. The Breitling Marks are vital to Breitling's business, as the Marks represent a significant value to the company and its associated image. Breitling suffers irreparable harm to its goodwill, as well as a direct monetary loss, any time any third parties, including Defendants, sell counterfeit and infringing goods bearing an identical or substantially similar trademarks.

#### **Hublot's Rights**

35. Hublot is the owner of the following trademarks, which are valid and registered on the Principal Register of the United States Patent and Trademark Office (the "Hublot Marks"):

<b>Trademark</b>	<b>Registration Number</b>	<b>Registration Date</b>	<b>Class / Goods</b>
	1,222,529	January 4, 1983	IC 014. Watches and Clocks and Parts Therefor; Chronometers; Chronographs; Costume Jewelry and Jewelry Made Wholly or in Part of Precious Metals.

BIG BANG	3,149,003	September 26, 2006	IC 014: Timepieces and chronometric instruments and parts thereof namely watch cases, watch bands, watches used as chronographs, watches used as chronoscopes, chronometers, watches, wristwatches, dress watches, diving watches, movements for clocks and watches, movements for watches.
	3,715,561	November 24, 2009	IC 014: Jewelry; horological and chronometric instruments, namely, watches, wristwatches, watchbands, watch cases, dials, clocks, wall clocks, chronometers, chronographs.

The Hublot Marks are used in connection with the manufacture and distribution of high-quality watches and other horological instruments. True and correct copies of the Certificates of Registration for the Hublot Marks are attached to the Complaint as Composite Exhibit “4.”

36. Hublot, through and in connection with related companies, is engaged in the promotion, distribution, and sale of high-quality watches and other horological instruments in interstate commerce in the United States under the Hublot Marks.

37. The Hublot Marks have been extensively and continuously used in interstate commerce to identify and distinguish Hublot’s high-quality watches and other horological instruments for an extended period of time and serve as symbols of Hublot’s quality, reputation, and goodwill. The Hublot Marks have never been abandoned.

38. Genuine Hublot watches are marketed and sold at Hublot boutiques throughout the United States, at prestigious retailers which are carefully selected and satisfy certain criteria, and via the Internet.

39. During the time that Hublot watches have been sold in interstate commerce under the Hublot Marks, Hublot and related companies expended substantial resources developing, advertising, and promoting watches and other horological instruments under the Hublot Marks in

magazines, newspapers, on the Internet and in other media worldwide, including the official Hublot website, [www.hublot.com](http://www.hublot.com). In the recent years, Hublot's sales of watches and other horological instruments have been well into the many millions of dollars.

40. As a result of the foregoing, the Hublot Marks have acquired fame in the consumer market for a wide variety of products, including watches and other horological instruments.

41. The Hublot Marks are widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as identifiers of high-quality watches and other horological instruments.





42. Hublot carefully monitors and polices the use of the Hublot Marks and has never assigned or licensed the Hublot Marks to any Defendant in this matter.


43. Additionally, Hublot and related companies expend substantial resources ensuring that its genuine goods meet the exacting certification standards established by the Federation as part of an effort to guarantee that consumers can expect certain quality attributes from watches, including components thereof, permitted to use the Swiss Marks in combination with the Hublot Marks.

44. The Hublot Marks are vital to Hublot's business, as the Marks represent a significant value to the company and its associated image. Hublot suffers irreparable harm to its goodwill, as well as a direct monetary loss, any time any third parties, including Defendants, sell counterfeit and infringing goods bearing an identical or substantially similar trademarks.

#### **Omega's Rights**

45. Omega is the owner of the following trademarks, which are valid and registered on the Principal Register of the United States Patent and Trademark Office (the "Omega Marks"):

<b>Trademark</b>	<b>Registration Number</b>	<b>Registration Date</b>	<b>Class / Goods</b>
 OMEGA	25,036	July 24, 1894	IC 014. Watch movements and watch cases.
SEAMASTER	556,602	March 25, 1952	IC 014. Watches, watch parts and watch movements.
<b>OMEGA</b>	566,370	November 4, 1952	IC 014. Watches and parts thereof.
 OMEGA	578,041	July 28, 1953	IC 014. Watches (including pocket watches, wrist watches with or without straps, bands or bracelets, pendant watches, calendar watches, and stopwatches) either stem-wind or automatic; clocks; chronometers, chronographs, and parts for all of the foregoing.
SPEEDMASTER	672,487	January 13, 1959	IC 014. Watches and clocks.
	734,891	July 24, 1962	IC 014. Timepieces and parts thereof.
CONSTELLATION	1,223,349	January 11, 1983	IC 014. Watches and parts thereof.
 OMEGA	1,290,661	August 21, 1984	IC 014. Watch Cases [ , Watch Chains, and Watch Stands Sold as a Unit with Watches ].
DE VILLE	1,309,929	December 18, 1984	IC 014. Watches, Wrist Watches, Portfolio Watches, Pendant Watches, and Miniature Clocks; and Parts Thereof.
PLANET OCEAN	3,085,659	April 25, 2006	IC 014. Watches and watch parts.
SEAMASTER	3,640,080	June 16, 2009	IC 014. Jewelry, [ precious stones; ] horological and chronometrical instruments.

AQUA TERRA	4,299,644	March 12, 2013	IC 014. Watches, watch straps, watch bracelets and parts thereof, chronometers, chronographs for use as watches, watches made of precious metals, watches partly or entirely set with precious stones.
CO-AXIAL	4,442,192	December 3, 2013	IC 014. Horological and chronometric instruments.
DARK SIDE OF THE MOON	4,735,993	May 12, 2015	IC 014. Horological and chronometric instruments.
	5,094,915	December 6, 2016	IC 014. Horological and chronometric instruments and parts for the aforesaid goods; accessories namely, watch chains, presentation cases for watches and cases for watches.
CO-AXIAL MASTER CHRONOMETER	5,266,563	August 15, 2017	IC 014. horological and chronometric instruments.

The Omega Marks are used in connection with the manufacture and distribution of high-quality watches and other horological instruments. True and correct copies of the Certificates of Registration for the Omega Marks are attached to the Complaint as Composite Exhibit “5.”

46. Omega is engaged in the promotion, distribution, and sale of high-quality watches and other horological instruments in interstate commerce in the United States under the Omega Marks.

47. The Omega Marks have been extensively and continuously used in interstate commerce to identify and distinguish Omega’s high-quality watches and other horological instruments for an extended period of time and serve as symbols of Omega’s quality, reputation, and goodwill. The Omega Marks have never been abandoned.

48. Genuine Omega watches are marketed and sold at Omega boutiques throughout the United States, at prestigious retailers which are carefully selected and satisfy certain criteria, and via the Internet.

49. During the time that Omega watches have been sold in interstate commerce under the Omega Marks, Omega expended substantial resources developing, advertising, and promoting watches and other horological instruments under the Omega Marks in magazines, newspapers, on the Internet and in other media worldwide, including the official Omega website, [www.omegawatches.com](http://www.omegawatches.com). In the recent years, Omega's sales of watches and other horological instruments have been well into the many millions of dollars.

50. As a result of the foregoing, the Omega Marks have acquired fame in the consumer market for a wide variety of products, including watches and other horological instruments.

51. The Omega Marks are widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as identifiers of high-quality watches and other horological instruments.


52. Omega carefully monitors and polices the use of the Omega Marks and has never assigned or licensed the Omega Marks to any Defendant in this matter.

53. Additionally, Omega expends substantial resources ensuring that its genuine goods meet the exacting certification standards established by the Federation as part of an effort to guarantee that consumers can expect certain quality attributes from watches, including components thereof, permitted to use the Swiss Marks in combination with the Omega Marks.

54. The Omega Marks are vital to Omega's business, as the Marks represent a significant value to the company and its associated image. Omega suffers irreparable harm to its goodwill, as well as a direct monetary loss, any time any third parties, including Defendants, sell counterfeit and infringing goods bearing an identical or substantially similar trademarks.

**Patek Philippe's Rights**

55. Patek Philippe is the owner of the following trademarks, which are valid and registered on the Principal Register of the United States Patent and Trademark Office (the “Patek Philippe Marks”):

<b>Trademark</b>	<b>Registration Number</b>	<b>Registration Date</b>	<b>Class / Goods</b>
PATEK PHILIPPE	520,291	January 24, 1950	IC 014. Watches.
PATEK PHILIPPE	764,655	February 11, 1964	IC 014. Leather Straps for Wrist Watches
AQUANAUT	2,804,346	January 13, 2004	IC 014. [ Precious metals and their alloys; ] goods formed of precious metals or coated with precious metals, namely, watches, wristwatches, watch cases, watch bands, watch straps, [ bracelets, cuff links and necklaces; jewelry, precious stones, namely, diamonds and gemstones; ] horological and chronometric instruments, namely, watches, wristwatches, clocks and chronometers.
	5,019,815	August 16, 2016	IC 014. Mechanical and electronic timepieces and spare parts therefor; electronic and mechanical pendulum clocks and small clocks and spare parts for the same; master clocks, secondary clocks; clocks and watches and spare parts therefor; cases and dials for watches and small clocks; stands and holders for small clocks; watch chains, watch straps, watch cases, watch clasps; jewelry; cuff links; precious stones.

The Patek Philippe Marks are used in connection with the manufacture and distribution of high-watches and other horological instruments. True and correct copies of the Certificates of Registration for the Patek Philippe Marks are attached to the Complaint as Composite Exhibit “6.”

56. Patek Philippe SA designs, develops, and markets Patek Philippe brand watches and other horological instruments. Patek Philippe is engaged in the promotion, distribution, and



sale of high-quality watches and other horological instruments in interstate commerce in the United States under the Patek Philippe Marks.

57. The Patek Philippe Marks have been extensively and continuously used in interstate commerce to identify and distinguish Patek Philippe's high-quality watches and other horological instruments for an extended period of time and serve as symbols of Patek Philippe's quality, reputation, and goodwill. The Patek Philippe Marks have never been abandoned.

58. Genuine Patek Philippe watches are marketed and sold at prestigious retailers, throughout the United States, which are carefully selected and satisfy certain criteria.

59. During the time that Patek Philippe watches have been sold in interstate commerce under the Patek Philippe Marks, Patek Philippe expended substantial resources developing, advertising, and promoting watches and other horological instruments under the Patek Philippe Marks in magazines, newspapers, on the Internet and in other media worldwide, including the official Patek Philippe website, [www.patek.com](http://www.patek.com). In the recent years, Patek Philippe's sales of watches and other horological instruments have been well into the many millions of dollars.

60. As a result of the foregoing, the Patek Philippe Marks have acquired fame in the consumer market for a wide variety of products, including watches and other horological instruments.

61. The Patek Philippe Marks are widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as identifiers of high-quality watches and other horological instruments.

62. Patek Philippe carefully monitors and polices the use of the Patek Philippe Marks and has never assigned or licensed the Patek Philippe Marks to any Defendant in this matter.

63. Additionally, Patek Philippe expends substantial resources ensuring that its genuine goods meet the exacting certification standards established by the Federation as part of an effort to guarantee that consumers can expect certain quality attributes from watches, including components thereof, permitted to use the Swiss Marks in combination with the Patek Philippe Marks.

64. The Patek Philippe Marks are vital to Patek Philippe's business, as the Marks represent a significant value to the company and its associated image. Patek Philippe suffers irreparable harm to its goodwill, as well as a direct monetary loss, any time any third parties, including Defendants, sell counterfeit and infringing goods bearing an identical or substantially similar trademarks.

**Turlen's Rights**

65. Turlen is the owner of the following trademarks which is valid and registered on the Principal Register of the United States Patent and Trademark Office (the "Richard Mille Mark"):

<b>Trademark</b>	<b>Registration Number</b>	<b>Registration Date</b>	<b>Class / Goods</b>
RICHARD MILLE	3,117,381	July 18, 2006	IC 014. Horological and chronometric instruments

The Richard Mille Mark is used in connection with the manufacture and distribution of high-quality watches and other horological instruments. A true and correct copy of the Certificate of Registration for the Richard Mille Mark is attached to the Complaint as Exhibit "7."

66. Turlen, through and in connection with related companies, is engaged in the promotion, distribution, and sale of high-quality watches and other horological instruments in interstate commerce in the United States under the Richard Mille Mark.

67. The Richard Mille Mark has been extensively and continuously used in interstate commerce to identify and distinguish Turlen's high-quality watches and other horological instruments for an extended period of time and serve as a symbol of Turlen's quality, reputation, and goodwill. The Richard Mille Mark has never been abandoned.

68. Genuine Richard Mille branded watches are marketed and sold at Richard Mille boutiques throughout the United States, and at prestigious retailers which are carefully selected and satisfy certain criteria.

69. During the time that Richard Mille branded watches have been sold in interstate commerce under the Richard Mille Mark, Turlen and related companies expended substantial resources developing, advertising, and promoting watches and other horological instruments under the Richard Mille Mark in magazines, newspapers, on the Internet and in other media worldwide, including the official Richard Mille website, [www.richardmille.com](http://www.richardmille.com). In the recent years, sales of Richard Mille branded watches and other horological instruments have been well into the many millions of dollars.

70. As a result of the foregoing, the Richard Mille Mark has acquired fame in the consumer market for a wide variety of products, including watches and other horological instruments.

71. The Richard Mille Mark is widely recognized trademarks in the United States, and the trademark has achieved secondary meaning as an identifier of high-quality watches and other horological instruments.


72. Turlen carefully monitors and polices the use of the Richard Mille Mark and has never assigned or licensed the Richard Mille Mark to any Defendant in this matter.

73. Additionally, Turlen and related companies expend substantial resources ensuring that its genuine goods meet the exacting certification standards established by the Federation as part of an effort to guarantee that consumers can expect certain quality attributes from watches, including components thereof, permitted to use the Swiss Marks in combination with the Richard Mille Marks.

74. The Richard Mille Mark is vital to Turlen’s business, as the Mark represents a significant value to the company and its associated image. Turlen suffers irreparable harm to its goodwill, as well as a direct monetary loss, any time any third parties, including Defendants, sell counterfeit and infringing goods bearing an identical or substantially similar trademark.

#### **LVMH’S Rights**

75. LVMH is the owner of the following trademarks, which are valid and registered on the Principal Register of the United States Patent and Trademark Office (the “Tag Heuer Marks”):

<b>Trademark</b>	<b>Registration Number</b>	<b>Registration Date</b>	<b>Class / Relevant Goods</b>
FORMULA 1	1,435,463	April 7, 1987	IC 014. Mechanical watches, and their constituent parts.
	1,471,988	January 12, 1988	IC 014. Clocks, watches and parts thereof.
TAG HEUER	2,281,436	September 28, 1999	IC 014. Clocks, watches and parts thereof.
AQUARACER	3,046,300	January 17, 2006	IC 014. Jewelry, precious stones; timepieces and chronometric instruments, namely watches, watchbands, chronometers, chronographs for use as watches, clocks.
TAG	4,868,760	December 15, 2015	IC 014. Timepieces and chronometric instruments.
TAG HEUER	5,202,283	May 16, 2017	IC 014. Jewelry; precious stones; horological instruments, namely, watches, wristwatches, and constitutive parts therefor; alarm clocks, clocks and other chronometric instruments, chronometers,

			<p>chronographs as watches, chronometric apparatus for sports timing, chronometric apparatus for measuring and marking the time; watch bands, watch chains, watch springs, watch dials or watch glasses, watch winders, watch cases being parts of watches, cases and boxes adapted for holding watches; precious metals and their alloys; jewelry cases; boxes of precious metal; key rings, trinkets or fobs of precious metals; cuff links; bracelets; rings; medals; watches that also have a function of transmitting and/or receiving data to and/or from personal digital assistants, tablets, smart phones and personal computers through internet websites and other computer and electronic communication networks; watches containing an electronic game function, watches incorporating a telecommunication function; leather boxes adapted for holding watches.</p> <p>IC 035. Retail store services and online retail store services featuring cosmetics, hair care and skin care preparations, perfumes, shaving preparations, toiletries, smartwatches, computers, tablet computers, computer hardware, computer software, computer peripherals, telephones, mobile electronic devices, health, fitness and exercise sensors, monitors and displays, computer gaming machines and electronic games, and accessories for computers, telephones, and mobile electronic devices, sunglasses, spectacles, optical lenses and glasses, spectacle cases, jewelry and precious stones, watches, clocks, chronometric instruments, accessories for watches and chronometric instruments, leather goods, leatherware, bags, briefcases, luggage, wallets, purses, umbrellas, clothing, footwear, and headgear; public relations; advertising services for luxury products, namely, cosmetics, perfumes, optical goods, telephones, wearable electronic devices, jewelry, horological products, watches, connected watches, smartwatches, luggage, leatherware, bags, clothing, clothing accessories; business management and organization consultancy in the field of luxury goods.</p>
	5,314,173	August 8, 2017	<p>IC 014. Jewelry; precious stones; horological instruments, namely, watches, wristwatches, and constitutive parts therefor; alarm clocks, clocks</p>

			<p>and other chronometric instruments, chronometers, chronographs as watches, chronometric apparatus for sports timing, chronometric apparatus for measuring and marking the time; watch bands, watch chains, watch springs, watch dials or watch glasses, watch winders, watch cases being parts of watches, cases and boxes adapted for holding watches; precious metals and their alloys; jewelry cases; boxes of precious metal; key rings trinkets or fobs of precious metals; cuff links; bracelets; rings; medals; watches that also have a function of transmitting and/or receiving data to and/or from personal digital assistants, tablets, smart phones and personal computers through internet websites and other computer and electronic communication networks; watches containing an electronic game function, watches incorporating a telecommunication function; leather boxes adapted for holding watches.</p> <p>IC 035. Retail store services and online retail store services featuring cosmetics, hair care and skin care preparations, perfumes, shaving preparations, toiletries, smartwatches, computers, tablet computers, computer hardware, computer software, computer peripherals, telephones, mobile electronic devices, health, fitness and exercise sensors, monitors and displays, computer gaming machines and electronic games, and accessories for computers, telephones, and mobile electronic devices, sunglasses, spectacles, optical lenses and glasses, spectacle cases, jewelry and precious stones, watches, clocks, chronometric instruments, accessories for watches and chronometric instruments, leather goods, leatherware, bags, briefcases, luggage, wallets, purses, umbrellas, clothing, footwear, and headgear; public relations; advertising services for luxury products, namely, cosmetics, perfumes, optical goods, telephones, wearable electronic devices, jewelry, horological products, watches, connected watches, smartwatches, luggage, leatherware, bags, clothing, clothing accessories; business management and organization consultancy in the field of luxury goods.</p>
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The Tag Heuer Marks are used in connection with the manufacture and distribution of high-quality watches and other horological instruments. True and correct copies of the Certificates of Registration for the Tag Heuer Marks are attached to the Complaint as Composite Exhibit “8.”

76. LVMH, through and in connection with related companies, is engaged in the promotion, distribution, and sale of high-quality watches and other horological instruments in interstate commerce in the United States under the Tag Heuer Marks.

77. The Tag Heuer Marks have been extensively and continuously used in interstate commerce to identify and distinguish LVMH’s high-quality watches and other horological instruments for an extended period of time and serve as symbols of LVMH’s quality, reputation, and goodwill. The Tag Heuer Marks have never been abandoned.

78. Genuine LVMH watches are marketed and sold at LVMH boutiques throughout the United States, at select prestigious retailers and department stores, and via the Internet.

79. During the time that LVMH watches have been sold in interstate commerce under the Tag Heuer Marks, LVMH and related companies expended substantial resources developing, advertising, and promoting watches and other horological instruments under the Tag Heuer Marks in magazines, newspapers, on the Internet and in other media worldwide, including the official Tag Heuer website, [www.tagheuer.com](http://www.tagheuer.com). In the recent years, LVMH’s sales of watches and other horological instruments have been well into the many millions of dollars.

80. As a result of the foregoing, the Tag Heuer Marks have acquired fame in the consumer market for a wide variety of products, including watches and other horological instruments.

81. The Tag Heuer Marks are widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as identifiers of high-quality watches and other horological instruments.

82. LVMH carefully monitors and polices the use of the Tag Heuer Marks and has never assigned or licensed the Tag Heuer Marks to any Defendant in this matter.

83. Additionally, LVMH expends substantial resources ensuring that its genuine goods meet the exacting certification standards established by the Federation as part of an effort to guarantee that consumers can expect certain quality attributes from watches, including components thereof, permitted to use the Swiss Marks in combination with the Tag Heuer Marks.

84. The Tag Heuer Marks are vital to LVMH's business, as the Marks represent a significant value to the company and its associated image. LVMH suffers irreparable harm to its goodwill, as well as a direct monetary loss, any time any third parties, including Defendants, sell counterfeit and infringing goods bearing an identical or substantially similar trademarks.

#### **Investigation of Defendants' Counterfeiting Activities**

85. Plaintiffs discovered Defendants are promoting, advertising, offering for sale and/or selling watches and other horological instruments using counterfeit and infringing trademarks which are exact copies of the Swiss Marks, Audemars Piguet Marks, Breitling Marks, Hublot Marks, Omega Marks, Patek Philippe Marks, Richard Mille Mark, and/or Tag Heuer Marks (collectively, "Plaintiffs' Marks"), without Plaintiffs' authorization, via at least the fully interactive commercial Internet websites operating under the domain names identified on Schedule "A" hereto (the "Subject Domain Names"). Defendants do not have, nor have they ever had, the right or authority to use Plaintiffs' Marks. Further, Plaintiffs' Marks have never been assigned or licensed to be used in connection with any of the Subject Domain Names.



86. Prior to filing this Declaration, I reviewed the various watches and other horological instruments bearing Plaintiffs' Marks offered for sale by Defendants via the Internet websites operating under each of the Subject Domain Names and/or the websites to which those domain names either automatically or manually redirect, and I determined the products were non-genuine, unauthorized versions of Plaintiffs' branded products and do not comply with the certification standards for use of the Swiss Marks. I reached this conclusion through my observations of the pricing, which is far below the prices of genuine goods of similar style and design. I also observed certain product and marking characteristics which are not consistent with Plaintiffs' genuine goods. Moreover, I noted disclaimers on all but one of the websites in which Defendants expressly acknowledge Plaintiffs' branded goods sold thereon are "replica," "fake," or "clone." Additionally, because the watches offered for sale by Defendants are counterfeit, they cannot meet the certification standards set forth by the Federation for use of the Swiss Marks. Finally, I personally know that Plaintiffs do not conduct business with Defendants, and Defendants have never been licensed, nor do they have the right or authority to use Plaintiffs' Marks for any purpose.

87. In view of the foregoing, I can confirm the products Defendants are offering for sale and/or promoting using Plaintiffs' Marks via the Internet websites operating under the Subject Domain Names are counterfeit goods.

#### **Harm Caused To Plaintiffs By Defendants' Activities**

88. Genuine goods bearing Plaintiffs' Marks are widely legitimately advertised, promoted, offered for sale, and discussed by Plaintiffs, their authorized distributors and unrelated third parties via the Internet.

89. Visibility on the Internet, particularly via Internet search engines and social media platforms, is important to Plaintiffs' overall marketing and consumer education efforts. Thus,

Plaintiffs jointly expend significant monetary and other resources on Internet marketing and consumer education regarding their products, including search engine optimization, search engine marketing, and social media strategies, which allow Plaintiffs and their authorized retailers to educate consumers fairly and legitimately about the value associated with Plaintiffs' brands and the goods sold thereunder and the problems associated with the counterfeiting of Plaintiffs' trademarks.

90. Each year, Plaintiffs also expend significant monetary resources on a combined basis in connection with trademark enforcement efforts, including global law enforcement training, legal fees, and investigative fees.

91. Each individual counterfeiter's actions, alone, cause Plaintiffs irreparable harm. However, the sheer number of counterfeit website operators act as a force multiplier of those individual harms and create a massive single reputation harm to the Plaintiffs as a group. Plaintiffs face significant economic and logistical challenges in enforcing their trademark rights against each online store individually. Single defendant enforcement in the face of the overwhelming infringement points of sale made possible by the unregulated and anonymous nature of the Internet is wholly ineffective and does not remedy the actual harm to Swatch Group caused by the crushing weight of all of Defendants' simultaneous counterfeiting.

92. During their joint investigations, Plaintiffs have repeatedly found that the anonymity and mass reach afforded by the Internet serves to create nearly impenetrable obstacles in identifying the full extent and scope of targeted counterfeiting operations. Online counterfeiters such as those in this case typically use false or concealed identifying information in their domain registrations and on their websites themselves, false or concealed Internet Protocol ("IP") addresses to conceal their true location, and inaccurate or unrelated origination information for

logistics and freight forwarding services. Most often, online sellers set up many multiple storefronts which appear unrelated to evade detection or complete closure of their entire operation once they are detected. Plaintiffs such as those herein have no way of determining those connections pre-enforcement and very little chance of receiving any meaningful discovery to assist in that task post-enforcement. In fact, Plaintiffs can typically only determine the actual relationships between Defendants when they appear through counsel and identify all of the stores in a particular group for the purpose of resolution.

93. Additionally, even after detection, online counterfeiters often simply set up shop elsewhere quickly and easily, before Plaintiffs' enforcement efforts, including litigation, are complete. The quick moving nature of online counterfeiting allows Defendants to quickly set up and dump payment accounts and e-commerce stores, leaving Plaintiffs with no recourse for the damage done in the time that would be eaten up by filing individual lawsuits. Without permissive joinder, in the end, Plaintiffs would be left filing large numbers of lawsuits often against the same sellers over and over without ever obtaining any meaningful relief.

94. Plaintiffs regularly see repeat offenders in unrelated matters or multiple websites and/or e-commerce stores operated by the same individuals or organizations, creating an elaborate game of "whack-a-mole." Given the ease for counterfeiters to create an e-commerce store template, those individuals or organizations can quickly and easily use that template to set up infinite storefronts without the time and investment Plaintiffs put into developing and marketing their products. Defendants, in cases such as this, simply steal the latest designs, slap together a storefront, and begin competing *en masse* with Plaintiffs on their own products across dozens of websites and third-party marketplace stores.

95. Despite utmost difficulty to specifically identify active, concerted relationships between the Defendants herein, Plaintiffs readily see and suffer from the combined harm caused by the Defendants' concurrent counterfeiting activities. Successfully addressing the common harm caused by the Defendants necessitates Plaintiffs grouping concurrently acting Defendants together to obtain any reasonable relief and prevent the drowning out of Plaintiffs' legitimate online product information and sales.

96. By benefitting from advertising and market targeting strategies based upon an unlawful use of the Plaintiffs Marks online, Defendants are jointly obliterating the otherwise open and available marketplace space in which Plaintiffs have the right to fairly market their goods and associated message. Specifically, Defendants use unauthorized counterfeits of one or more of Plaintiffs' trademarks to make their e-commerce stores selling unlawful goods appear more relevant and attractive to consumers searching for Plaintiffs' goods and information online. Such concurrent wrongful use of Plaintiffs' trademarks directly impairs Plaintiffs ability to compete for visibility on the World Wide Web, including search engine results space.

97. The combined force of Defendants' unlawful actions are contributing to the creation and maintenance of an illegal marketplace operating in parallel to the legitimate marketplace for Plaintiffs' genuine goods. Defendants are causing individual, concurrent and indivisible harm to Plaintiffs and the consuming public by (i) depriving Plaintiffs of their right to fairly compete for space online and within search engine results and reducing the visibility of Plaintiffs' genuine goods on the World Wide Web, (ii) causing an overall degradation of the value of the goodwill associated with Plaintiffs' Marks by viewing inferior products in either the pre or post sale setting, and/or (iii) increasing Plaintiffs' overall cost to market their goods and educate consumers about their brands via the Internet.

98. As a result of the availability of the non-genuine branded goods offered for sale by Defendants, Plaintiffs are highly likely to experience irreparable damage to their reputations among consumers absent the entry of an appropriate injunction.

I declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct. Executed this 24.10.2022 in Bienne, Switzerland.



David Luther

**SCHEDULE “A”**  
**DEFENDANTS BY NUMBER AND SUBJECT DOMAIN NAME**

<b>Defendant Number</b>	<b>Defendant / Subject Domain Name</b>	<b>Associated Redirect</b>
1	bestintimes.me	
1	1-1clone.com	
1	aaa-replica.com	hellorolex.so
1	amazingwatches.org	
1	apwatch.net	
1	apwatchchat.com	bestintimes.me
1	apwatches.net	apwatch.net
1	bassreplica.com	
1	bestapwatch.com	
1	bestenuhren.net	replicauhrenat.com
1	bestenuhrens.com	replicauhrenat.com
1	bestintimes.com	bestintimes.me
1	bestreplica.org	timereps.org
1	cchopardtimes.com	
1	ccluxury.org	
1	chattimes.me	
1	chopardforum.com	cchopardtimes.com
1	cinwatches.me	rolexforsale.me
1	clocktowerss.com	kuvarsitshop.com
1	cloneppwatch.com	finetimepieces.net
1	cmblogwatch.net	pureintime.net
1	cuwatch.com	
1	dermowatch.org	
1	detimer.net	replicauhrenat.com
1	dreampanerai.com	holapanerai.me
1	emyoku.com	bassreplica.com
1	fakewatchesswiss.com	usreplicas.com
1	falsiorologi.it	
1	farleftwatch.org	bassreplica.com
1	finetimepieces.net	
1	gradeclonewatch.com	perfect-clones.com
1	gradeonewatch.com	
1	hbuyings.me	
1	hellointimes.com	rolexforsale.me
1	holapanerai.net	holapanerai.me

1	hellorolex.so	
1	hellorolexwatch.com	hellorolex.so
1	hellorollie.com	hellorolex.so
1	highreplicasshop.com	hellorolex.so
1	hireplica.com	ireplicas.com
1	holapanerai.me	
1	holatime.me	
1	hotreplicas.net	timepiecebuy.org
1	innotizen.com	perfect-clones.com
1	ireplicas.com	
1	jfppwatch.com	pureintime.net
1	jfreplicawatch.com	ppfake.net
1	joinwatch.net	
1	juliuswatch.info	
1	king-watches.cn	
1	kuvarsitshop.com	
1	kuvarsitwatches.com	kuvarsitshop.com
1	linkpops.net	replicauhrenat.com
1	lreplica.com	ireplicas.com
1	luxurypanerai-sale.com	hellorolex.so
1	magicrolex.com	finetimepieces.net
1	menwatchessell.com	bassreplica.com
1	mrepwatches.com	paywatches.net
1	multiluxury.com	bassreplica.com
1	nurrawatches.com	hellorolex.so
1	ok-replica.net	
1	okreplicaclock.com	tswatchesltd.com
1	okreplicawatch.com	pureintime.net
1	okrepliquemontre.com	
1	omegachat.me	
1	omegaforsale.me	king-watches.cn
1	omegasweden.org	paywatches.net
1	paybestwatch.net	paywatches.net
1	paywatches.me	paywatches.net
1	paywatches.net	
1	perfake.me	
1	perfect-clones.com	
1	pfcmarek.me	
1	popwatch.org	king-watches.cn
1	porwatch.com	paywatches.net

1	ppfake.net	
1	pureintime.net	
1	puretime03.me	
1	puretimes.me	
1	puretimeswatch.com	puretimes.me
1	replicachopard.com	cchopardtimes.com
1	replicaomegasale.com	zowatch.com
1	replicatopwatches.com	
1	replicauhrenat.com	
1	replica-watch.net	bassreplica.com
1	replicawatchonline.com	usreplicas.com
1	repswatch.org	hellorolex.so
1	rmclone.com	
1	rolexforreplica.com	
1	rolexforsale.me	
1	roowatch.com	zowatch.com
1	skytime.biz	
1	skytimepiece.com	winreplicas.com
1	skytimepiece.org	skytime.biz
1	swisspanerai.com	holapanerai.me
1	swisswatchessales.com	puretimes.me
1	swisswatchessite.com	hellorolex.so
1	tagsea.me	
1	timepiecebuy.org	
1	timereps.org	
1	topgradewatch.com	perfect-clones.com
1	toppuretime.com	puretimes.me
1	topswissclock.com	topwatchesstore.com
1	topwatchesstore.com	
1	topwatchshop.org	perfake.me
1	trustytime88.com	
1	trustytimewatch.com	
1	tswatches.me	tswatchesltd.com
1	tswatchesltd.com	
1	tswatchshop.com	tswatchesltd.com
1	tttime.co	
1	usjaeger.com	watchesclocks.me
1	usreplicas.com	
1	uswisssale.me	hellorolex.so
1	vreplicawatches.com	



1	vshublot.com	trustytime88.com
1	watchesclocks.me	
1	watchindiscount.com	bassreplica.com
1	watchpig.com	bassreplica.com
1	winreplicas.com	
1	ywatch.org	king-watches.cn
1	zowatch.com	
1	zowatch.me	zowatch.com
2	affactorywatches.com	
2	arfactory.com.cn	
2	arwatches.org	
2	bestreplicawatch.cn	
2	bestswiss.net	
2	bestwatchesrolex.com	
2	breitlingreplicawatch.com	
2	copypatekphilippe.com	
2	copyrolexdaytona.com	
2	discountwatches.cn	
2	fakepatekwatches.com	
2	fakewatchesrolex.com	
2	menswatches.com.cn	
2	newlongines.com	
2	omegashop.net.cn	
2	patek-philipe.com	
2	repicalongines.net	
2	repicapatekphilippe.com	
2	repicawatch.ac.cn	
2	repicawatchesmap.org	
2	watchesoutlet.com.cn	
3	omegafamily.co	
4	allswisswatch.eu	allswisswatch.is
4	allswisswatch.is	
4	elitereplicawatch.eu	elitereplicawatch.is
4	elitereplicawatch.is	
4	replicahaus.ca	
4	replicahause.com.au	
4	replicahause.fr	
4	replicahause.is	
4	shopreplica.eu	
4	thereplicahaus.es	

5	betterbuywatches.com	replicamagicwatch.to
5	betterbuywatches.me	replicamagicwatch.to
5	e-luxurywatches.com	replicamagicwatch.to
5	e-luxurywatches.me	replicamagicwatch.to
5	replicamagic.is	
5	replicamagicwatch.me	
5	replicamagicwatch.to	
5	suitewatches.com	replicamagicwatch.to
5	swissexpert.me	replicamagicwatch.to
5	swissexpert.net	replicamagicwatch.to
5	swissreplicas.to	
5	watchsourceguide.com	replicamagicwatch.to
6	luxurywatchreplica.com	
6	noobfactorywatch.com	
6	noobreplicawatches.com	
6	repicaluxurywatch.com	
6	repिकासale.online	
6	repिकासale.vip	
6	repicawatchprice.com	
6	swissclonewatch.com	
6	swissluxuryreplica.com	
6	swissreplicashop.com	
6	swisswatches.vip	
7	361watches.com	
8	aaareplicawatch.co	aaa-replicawatch.co
8	aaa-replicawatch.co	
9	affordablewatches.ru	
10	annashop.com.ua	
11	biao.sr	
12	avenwatchesalike.co	
13	bywatch.co	
14	chasy-vip.by	
15	chinanoobwatch.cx	
15	replicachinawatch.cc	
16	chinwatch.co	
17	choosepopwatches.co	
18	cheapestwrist.co	
18	cheapestwrist.com	cheapestwrist.co
18	chrono4usale.co	
18	chronosale.co	chrono4usale.co

18	highluxurystore.co	
19	classicwatchess.com	
20	clonesuperwatch.io	
20	clonesuperwatch.ru	clonesuperwatch.io
21	cloudwatches.co	
21	x-watch.co	x-watches.co
21	x-watches.co	
22	contests4moms.com	watchcopy.live
22	watchcopy.live	
23	copwatchalike.co	copywatchalike.is
23	copywatchalike.co	copywatchalike.is
23	copywatchalike.is	
24	dealerclocks.shop	
24	dealerclocks.to	
25	deuhr.de	
26	donghosieure.vn	
27	eta-uhren.de	
28	fakewatchesforsell.com	
28	salefakewatches.com	
29	frmontre.fr	
29	replicareloj.co	
29	rrwatch.co	
29	watchfeed.co	
30	frs.fo	
31	hahabags.ru	ihahabags.ru
31	ihahabags.ru	
32	hontwatch.ru	
33	intime05.co.uk	
34	intime06.co	
35	intimereplica.co	
36	intimewatch.net	
37	iwatchclone.co	
38	jemontres.co	
39	jtime.io	
40	luxurypurse.cn	
40	replicaswatches.co	
40	ukwatches.cn	
41	magazin1.replicano.org	
42	minutka.by	
43	montrereplique.co	

44	montresdeluxe.co	
45	mywatches.com.pk	
45	replicawatches.pk	
45	rshop.com.pk	
46	noobwristwatch.net	
47	onlinewatcha.com	
48	orologiit.it	
49	orologireplicablog.com	
50	oscarfreirerelojoaria.com.br	
51	otxwatches.net	
52	perfectreplicawatch.to	perfectreplicawatches.to
52	perfectreplicawatches.to	
53	pkwatchstore.com	
54	pro-watch.co	
54	relojline.co	
54	watch-demo.cc	
54	watchesgoing.co	pro-watch.co
55	relojesreplicas.es	
55	relojessuizosdelujo.com	
55	replicasrelojesbaratos.com	
55	replikuhrenshop.de	
56	replicamade.is	
57	replica-relojes.es	
57	replicas-relojs.es	
58	replicashop1.com.ua	
59	replicas-relojes.es	
60	replica-uhren-shop.cc	
61	replicawatchreport.co	replicawatchreports.co
61	replicawatchreports.co	
62	rolexwanduhr.de	
63	royalwatches.pk	
64	skywalt.com	
65	teatrorivellino.it	
66	thefakewatches.com	
67	time-expert.com.ua	
68	trb88.club	
69	trustytimewatch88.io	
70	vipwatches.eu	
71	vogkopi.com	
72	vollmer-replica.com	

73	watchesi.co	
73	watchi.co	watchesi.co
74	watchesproduct.com	
74	watcheswork.com	
76	watchesyoga.io	
77	watchhutuk.com	
78	watch-paradise-1.ru	
78	watch-paradise-1.su	watch-paradise-1.ru
79	wristclone.ru	
80	yupoo.com.ru	yupoobrand.ru
80	yupoobrand.ru	