

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 22-CV-62000-RAR**

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

Plaintiffs,

v.

**BESTINTIMES.ME, *et al.*,**

Defendants.

---

**ORDER GRANTING PLAINTIFFS' MOTION FOR FINAL DEFAULT JUDGMENT**

**THIS CAUSE** comes before the Court upon Plaintiffs' Motion for Entry of Final Default Judgment [ECF No. 27] ("Motion"). Plaintiffs, Federation of the Swiss Watch Industry FH, Audemars Piguet Holding SA, Breitling SA, Breitling U.S.A. Inc., Hublot SA, Genève, Omega SA, Patek Philippe SA Geneve, Henri Stern Watch Agency, Inc., Turlen Holding SA, and LVMH Swiss Manufactures SA, seek entry of a default final judgment against Defendants, the Individuals, Business Entities, or Unincorporated Associations identified on Schedule "A" that operate Internet websites that infringe Plaintiffs' trademarks and promote and sell counterfeit goods bearing and/or using Plaintiffs' trademarks. *See generally* Mot. Plaintiffs request the Court: (1) enjoin Defendants from producing or selling goods that infringe on their trademarks; (2) disable, or at Plaintiffs' election, transfer the domain names at issue to Plaintiffs; (3) assign all rights, title, and interest, to the domain names to Plaintiffs and permanently delist or deindex the domain names from any Internet search engines; and (4) award statutory damages. *See generally id.*

A Clerk's Default [ECF No. 24] was entered against Defendants on December 8, 2022, after Defendants failed to respond to the Complaint [ECF No. 1], despite having been served. *See*

Proof of Service [ECF No. 18]. The Court having considered the record and noting no opposition to Plaintiffs' Motion, it is hereby

**ORDERED AND ADJUDGED** that Plaintiffs' Motion [ECF No. 27] is **GRANTED** for the reasons stated herein. Pursuant to Rule 58 of the Federal Rules of Civil Procedure, a default final judgment will be entered by separate order.

### **BACKGROUND**<sup>1</sup>

#### **A. Factual Background**

The Federation of the Swiss Watch Industry FH ("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

*See* Decl. of David Luther ("Luther Decl.") [ECF No. 5-2] ¶ 5. The Swiss Marks are used in connection with watches and other horological instruments of Swiss origin. *See id.*

Audemars Piguet Holding SA ("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"):

---



<sup>1</sup> The factual background is taken from Plaintiffs' Complaint, Motion, and supporting Declaration submitted by Plaintiffs.

Trademark	Registration Number	Registration Date	Class / Goods
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.
AP	3,696,017	October 13, 2009	IC 014. Timepieces, namely, watches, wristwatches, clocks, chronographs for use as watches, watch straps; clock dials, watch cases.
AP	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.
------------------------	-----------	------------------	---



See Luther Decl. ¶ 15. The Audemars Piguet Marks are used in connection with the manufacture and distribution of high-quality watches and other horological instruments. *See id.*

Breitling SA and Breitling U.S.A. Inc. (collectively “Breitling”) are the owners 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.


See Luther Decl. ¶ 25. The Breitling Marks are used in connection with the manufacture and distribution of high-quality watches and other horological instruments. *See id.*




Hublot SA, Genève (“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”):


Trademark	Registration Number	Registration Date	Class / Goods
 HUBLOT	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.

See Luther Decl. ¶ 35. The Hublot Marks are used in connection with the manufacture and distribution of high-quality watches and other horological instruments. *See id.*

Omega SA (“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”):

Trademark	Registration Number	Registration Date	Class / Goods
 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.
	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.
	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.

See Luther Decl. ¶ 45. The Omega Marks are used in connection with the manufacture and distribution of high-quality watches and other horological instruments. *See id.*

Patek Philippe SA Geneve and Henri Stern Watch Agency, Inc. (collectively “Patek Philippe”) are the owners 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”):

Trademark	Registration Number	Registration Date	Class / Goods
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.
---	-----------	-----------------	---

See Luther Decl. ¶ 55. The Patek Philippe Marks are used in connection with the manufacture and distribution of high-quality watches and other horological instruments. *See id.*

Turlen Holding SA (“Turlen”) is the owner of the following trademark, 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

See Luther Decl. ¶ 65. The Richard Mille Mark is used in connection with the manufacture and distribution of high-quality watches and other horological instruments. *See id.*

LVMH Swiss Manufactures SA (“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	<p>IC 014. Jewelry; precious stones; horological instruments, namely, watches, wristwatches, and constitutive parts therefor; alarm clocks, clocks 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</p>

			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.
	5,314,173	August 8, 2017	<p>IC 014. Jewelry; precious stones; horological instruments, namely, watches, wristwatches, and constitutive parts therefor; alarm clocks, clocks 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</p>

			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.
--	--	--	---

*See* Luther Decl. ¶ 75. The Tag Heuer Marks are used in connection with the manufacture and distribution of high-quality watches and other horological instruments. *See id.* The Swiss Marks, Audemars Piguet Marks, Breitling Marks, Hublot Marks, Omega Marks, Patek Philippe Marks, Richard Mille Mark, and Tag Heuer Marks are referred to herein as the “Plaintiffs’ Marks.”

Plaintiffs’ representative reviewed and visually inspected the various items bearing Plaintiffs’ trademarks offered for sale by Defendants through the Internet websites operating under their domain names identified on Schedule “A” (“Subject Domain Names”)<sup>2</sup> and determined the products were non-genuine, unauthorized versions of Plaintiffs’ products and do not comply with the certification standards for use of the Swiss Marks. *See* Luther Decl. ¶¶ 86–87. Based on their investigation, Plaintiffs allege Defendants have advertised, promoted, offered for sale, or sold

---

<sup>2</sup> Some Defendants use their Subject Domain Names to act as supporting domain names to direct traffic to their fully interactive, commercial websites operating under other Subject Domain Names, from which consumers can complete purchases. *See* Decl. of Virgilio Gigante [ECF No. 27-3] ¶ 2, n.1. Some of the supporting domain names, when accessed directly, appear to be blog style or non-operating websites; however, when visited from a search engine such as Google, visitors are redirected to the fully interactive websites operating under other Subject Domain Names. *Id.* Other supporting domain names either automatically redirect and forward to a fully interactive, commercial Internet website operating under one of the Subject Domain Names or redirect a consumer to a fully interactive, commercial Internet website operating under one of the Subject Domain Names upon clicking a product or link on the website. *Id.* Accordingly, the redirecting websites are identified as such in Schedule “A.” *Id.*

goods bearing and/or using what Plaintiffs have determined to be counterfeits, infringements, reproductions, or colorable imitations of Plaintiffs' Marks. *See id.*; Compl. ¶¶ 16–23, 104. Defendants are not now, nor have they ever been, authorized or licensed to use, reproduce, or make counterfeits, reproductions, or colorable imitations of Plaintiffs' Marks. *See* Luther Decl. ¶ 86.

## **B. Procedural Background**

On October 27, 2022, Plaintiffs filed their Complaint against Defendants. On October 31, 2022, Plaintiffs filed their *Ex Parte* Motion for Order Authorizing Alternate Service of Process [ECF No. 6] (“Motion for Alternate Service”). The Court entered an Order Granting the Motion for Alternate Service on November 2, 2022 [ECF No. 8]. In accordance with that Order, Plaintiffs served each Defendant with a summons and a copy of the Complaint via electronic mail, website posting, and registrar on November 8, 2022. *See* Decl. of Virgilio Gigante (“Gigante Decl.”) [ECF No. 27-3] ¶ 3; Proof of Service [ECF No. 18].

Defendants failed to file an answer or other response, and the time allowed for Defendants to respond to the Complaint has since expired. *See* Gigante Decl. ¶¶ 4–5. To Plaintiffs' knowledge, Defendants are not infants or incompetent persons, and the Servicemembers Civil Relief Act does not apply. *See id.* ¶ 6. On December 8, 2022, the Clerk entered default against Defendants [ECF No. 24] for failure to plead or otherwise defend pursuant to Federal Rule of Civil Procedure 55(a). Plaintiffs now move the Court for default final judgment against Defendants.

## **LEGAL STANDARD**

A party may apply to the court for a default judgment when the defendant fails to timely respond to a pleading. FED. R. CIV. P. 55(b)(2). “A defendant, by his default, admits the plaintiff's well-pleaded allegations of fact, is concluded on those facts by the judgment, and is barred from contesting on appeal the facts thus established.” *Eagle Hosp. Physicians, LLC v. SRG Consulting, Inc.*, 561 F.3d 1298, 1307 (11th Cir. 2009) (internal quotations omitted) (quoting *Nishimatsu*

*Const. Co. v. Houston Nat'l Bank*, 515 F.2d 1200, 1205 (5th Cir. 1975)). However, conclusions of law are to be determined by the court. *Mierzwicki v. CAB Asset Mgmt. LLC*, No. 14-61998, 2014 WL 12488533, at \*1 (S.D. Fla. Dec. 30, 2014). Therefore, a court may enter a default judgment only if there is a “sufficient basis to state a claim.” *Id.*

Once a plaintiff has established a sufficient basis for liability, the Court must conduct an inquiry to determine the appropriate damages. *PetMed Express, Inc. v. MedPets.Com, Inc.*, 336 F. Supp. 2d 1213, 1217 (S.D. Fla. 2004). Although an evidentiary hearing is generally required, the Court need not conduct such a hearing “when . . . additional evidence would be truly unnecessary to a fully informed determination of damages.” *Safari Programs, Inc. v. CollectA Int'l Ltd.*, 686 F. App'x 737, 746 (11th Cir. 2017). Therefore, where the record adequately supports the award of damages, an evidentiary hearing is not required. *See SEC v. Smyth*, 420 F.3d 1225, 1232 n.13 (11th Cir. 2005); *PetMed Express, Inc.*, 336 F.Supp.2d at 1217, 1223 (finding an evidentiary hearing unnecessary because plaintiff was seeking statutory damages under the Lanham Act); *Luxottica Grp. S.p.A. v. Casa Los Martinez Corp.*, No. 14-22859, 2014 WL 4948632, at \*2 (S.D. Fla. Oct. 2, 2014) (same).

## **ANALYSIS**

### **A. Claims**

Plaintiffs seek a default judgment for the relief sought in the Complaint, asserting the following claims against Defendants: (1) trademark counterfeiting and infringement under section 32 of the Lanham Act, in violation of 15 U.S.C. section 1114 (“Claim 1”); (2) false designation of origin under section 43(a) of the Lanham Act, in violation of 15 U.S.C. section 1125(a) (“Claim 2”); (3) cybersquatting under section 43(d) of the Lanham Act, in violation of 15 U.S.C. section 1125(d) (“Claim 3”); (4) unfair competition under Florida common law (“Claim 4”); and (5) trademark infringement under Florida common law (“Claim 5”). *See* Compl. ¶¶ 125–157.

### **1. Counterfeiting and Infringement**

Section 32 of the Lanham Act, 15 U.S.C. section 1114, provides liability for trademark infringement if, without the consent of the registrant, a defendant uses “in commerce any reproduction, counterfeit, copy, or colorable imitation of a registered mark . . . which . . . is likely to cause confusion, or to cause mistake, or to deceive.” 15 U.S.C. § 1114(1)(a). To prevail on its trademark infringement claim, a plaintiff must demonstrate “(1) that it had prior rights to the mark at issue and (2) that the defendant had adopted a mark or name that was the same, or confusingly similar to its mark, such that consumers were likely to confuse the two.” *Planetary Motion, Inc. v. Techsplosion, Inc.*, 261 F.3d 1188, 1193 (11th Cir. 2001) (footnote and citations omitted).

### **2. False Designation of Origin**

The test for liability for false designation of origin under 15 U.S.C. section 1125(a) is the same as for a trademark counterfeiting and infringement claim—*i.e.*, whether the public is likely to be deceived or confused by the similarity of the marks at issue. *See Two Pesos, Inc. v. Taco Cabana, Inc.*, 505 U.S. 763, 780 (1992) (Stevens, J., concurring in the judgment).

### **3. Cybersquatting**

The Anti-cybersquatting Consumer Protection Act (“ACPA”) protects the owner of a distinctive or famous trademark from another’s bad faith intent to profit from the trademark owner’s mark by registering or using a domain name that is identical or confusingly similar to, or dilutive of, the trademark owner’s mark without regard to the goods or services of the parties. *See* 15 U.S.C. § 1125(d). “To prevail under the ACPA, a plaintiff must prove that (1) its mark is distinctive or famous and entitled to protection; (2) the defendant’s domain name is identical or confusingly similar to the plaintiff’s mark; and (3) the defendant registered or used the domain name with a bad faith intent to profit.” *See Bavaro Palace, S.A. v. Vacation Tours, Inc.*, 203 F. App’x. 252, 256 (11th Cir. 2006) (citing *Shields v. Zuccarini*, 254 F.3d 476, 482 (3d Cir. 2001)).

#### **4. Common Law Unfair Competition**

Whether a defendant's use of a plaintiff's trademarks created a likelihood of confusion between the plaintiff's and the defendant's products is also the determining factor in the analysis of unfair competition under the common law of Florida. *See Rolex Watch U.S.A., Inc. v. Forrester*, No. 83-8381, 1986 WL 15668, at \*3-4 (S.D. Fla. Dec. 9, 1986) (“[I]t is clear that the Court need not find ‘actual confusion’ . . . . The proper test is ‘likelihood of confusion . . . .’”).

#### **5. Common Law Trademark Infringement**

The analysis of liability for Florida common law trademark infringement is the same as the analysis of liability for trademark infringement under section 32(a) of the Lanham Act. *See PetMed Express, Inc.*, 336 F. Supp. 2d at 1217-18.

##### **B. Liability**

The well-pleaded factual allegations of Plaintiffs' Complaint properly contain the elements for each of the above claims and are admitted by virtue of Defendants' defaults. *See* Compl. ¶¶ 16-23, 104-119, 126-128, 133-137, 141-144, 148-150 and 153-156. Moreover, the Complaint's factual allegations have been substantiated by sworn declarations and other evidence and establish Defendants' liability for each of the claims asserted. Accordingly, default judgment pursuant to Rule 55 is appropriately entered against Defendants.

##### **C. Relief**

Plaintiffs request an award of equitable relief and monetary damages against Defendants for trademark infringement in Claim 1 and cybersquatting in Claim 3. The Court analyzes Plaintiffs' request for relief as to Claims 1 and 3 only, as the judgment for Claims 2, 4, and 5—false designation of origin, common law unfair competition, and common law trademark infringement, respectively—is limited to entry of the requested equitable relief for Claim 1. *See generally* Mot.

Injunctive Relief. Pursuant to the Lanham Act, a district court is authorized to issue an injunction “according to the principles of equity and upon such terms as the court may deem reasonable,” to prevent violations of trademark law. 15 U.S.C. § 1116(a). Indeed, “[i]njunctive relief is the remedy of choice for trademark and unfair competition cases, since there is no adequate remedy at law for the injury caused by a defendant’s continuing infringement.” *Burger King Corp. v. Agad*, 911 F. Supp. 1499, 1509–10 (S.D. Fla. 1995) (alteration in original) (internal quotation marks omitted) (quoting *Century 21 Real Estate Corp. v. Sandlin*, 846 F.2d 1175, 1180 (9th Cir. 1988)). Injunctive relief is available even in the default judgment setting, *see, e.g., PetMed Express, Inc.*, 336 F. Supp. 2d at 1222–23, because Defendants’ failure to respond or otherwise appear makes it difficult for a plaintiff to prevent further infringement absent an injunction. *See Jackson v. Sturkie*, 255 F. Supp. 2d 1096, 1103 (N.D. Cal. 2003) (“[D]efendant’s lack of participation in this litigation has given the court no assurance that defendant’s infringing activity will cease. Therefore, plaintiff is entitled to permanent injunctive relief.”).

Permanent injunctive relief is appropriate where a plaintiff demonstrates: (1) it has suffered irreparable injury; (2) there is no adequate remedy at law; (3) the balance of hardship favors an equitable remedy; and (4) an issuance of an injunction is in the public’s interest. *See eBay, Inc. v. MercExchange, LLC*, 547 U.S. 388, 391–92 (2006). Plaintiffs have carried their burden on each of the four factors.

Specifically, in trademark cases, “a sufficiently strong showing of likelihood of confusion [caused by trademark infringement] may by itself constitute a showing of . . . a substantial threat of irreparable harm.” *E. Remy Martin & Co., S.A. v. Shaw-Ross Int’l Imports, Inc.*, 756 F.2d 1525, 1530 (11th Cir. 1985) (footnote omitted); *see also Levi Strauss & Co. v. Sunrise Int’l Trading Inc.*, 51 F.3d 982, 986 (11th Cir. 1995) (“There is no doubt that the continued sale of thousands of pairs



of counterfeit jeans would damage [the plaintiff's] business reputation and decrease its legitimate sales.”). Plaintiffs’ Complaint and the submissions show that the goods produced and sold by Defendants are nearly identical to Plaintiffs’ genuine products, and consumers viewing Defendants’ counterfeit goods post-sale would actually confuse them for Plaintiffs’ genuine products. *See, e.g.*, Compl. ¶ 105 (“Defendants’ actions are likely to cause confusion of consumers at the time of initial interest, sale, and in the post-sale setting, who will believe all of Defendants’ goods are genuine goods originating from, associated with, and/or certified by Plaintiffs.”).

Plaintiffs have no adequate remedy at law so long as Defendants continue to operate the Subject Domain Names because Plaintiffs cannot control the quality of what appear to be their products in the marketplace. An award of monetary damages alone will not cure the injury to Plaintiffs’ reputations and goodwill if Defendants’ infringing and counterfeiting continue. Moreover, Plaintiffs face hardship from the loss of their inability to control their reputations in the marketplace. By contrast, Defendants face no hardship if they are prohibited from the infringement of Plaintiffs’ trademarks. Finally, the public interest supports the issuance of a permanent injunction against Defendants to prevent consumers from being misled by Defendants’ products, and potentially harmed by their inferior quality. *See Chanel, Inc. v. besumart.com*, 240 F. Supp. 3d 1238, 1291 (S.D. Fla. 2016) (“[A]n injunction to enjoin infringing behavior serves the public interest in protecting consumers from such behavior.” (citation omitted)); *World Wrestling Entm’t, Inc. v. Thomas*, No. 12-21018, 2012 WL 12874190, at \*8 (S.D. Fla. Apr. 11, 2012) (considering the potential for harm based on exposure to potentially hazardous counterfeit merchandise in analyzing public’s interest in an injunction).

Broad equity powers allow the Court to fashion injunctive relief necessary to stop Defendants’ infringing activities. *See, e.g., Swann v. Charlotte-Mecklenburg Bd. of Educ.*, 402

U.S. 1, 15 (1971) (“Once a right and a violation have been shown, the scope of a district court’s equitable powers to remedy past wrongs is broad, for . . . [t]he essence of equity jurisdiction has been the power of the Chancellor to do equity and to mould [sic] each decree to the necessities of the particular case.” (citation and internal quotation marks omitted)); *United States v. Bausch & Lomb Optical Co.*, 321 U.S. 707, 724 (1944) (“Equity has power to eradicate the evils of a condemned scheme by prohibition of the use of admittedly valid parts of an invalid whole.” (citations omitted)). District courts are expressly authorized to order the transfer or surrender of domain names in an *in rem* action against a domain name. *See* 15 U.S.C. §§ 1125(d)(1)(C), (d)(2). However, courts have not limited the remedy to that context. *See, e.g., Philip Morris USA, Inc. v. Otamedia Ltd.*, 331 F. Supp. 2d 228, 230 n.2 (S.D.N.Y. 2004) (transferring Yesmoke.com domain name to plaintiff despite the fact the plaintiff did not own a trademark in the term “Yesmoke” and noting 15 U.S.C. section 1125 “neither states nor implies that an *in rem* action against the domain name constitutes the exclusive remedy for a plaintiff aggrieved by trademark violations in cyberspace”); *Ford Motor Co. v. Cross*, 441 F. Supp. 2d 837, 853 (E.D. Mich. 2006) (ordering the defendants to disclose all other domain registrations held by them and to transfer registration of a particular domain name to plaintiff in part under authority of 15 U.S.C. section 1116(a)).

Defendants have created an Internet-based counterfeiting scheme in which they are profiting from their deliberate misappropriation of Plaintiffs’ rights. Accordingly, the Court may fashion injunctive relief to eliminate the means by which Defendants are conducting their unlawful activities. Appropriate remedies to achieve this end include ordering the cancellation or transfer of the Subject Domain Names to Plaintiffs, assigning all rights, title, and interest to the Subject Domain Names to Plaintiffs, and permanently delisting or deindexing the Subject Domain Names

from any Internet search engine, such that these means may no longer be used as instrumentalities to further the sale of counterfeit goods.

Statutory Damages. In a case involving the use of counterfeit marks in connection with the sale, offering for sale, or distribution of goods, 15 U.S.C. section 1117(c) provides that a plaintiff may elect an award of statutory damages at any time before final judgment is rendered in the sum of not less than \$1,000.00 nor more than \$200,000.00 per counterfeit mark per type of good. *See* 15 U.S.C. § 1117(c)(1). In addition, if the Court finds Defendants' counterfeiting actions were willful, it may impose damages above the maximum limit up to \$2,000,000.00 per counterfeit mark per type of good. *See* 15 U.S.C. § 1117(c)(2).

The Court has wide discretion to determine the amount of statutory damages. *See PetMed Express, Inc.*, 336 F. Supp. 2d at 1219 (citations omitted). An award of statutory damages is appropriate despite a plaintiff's inability to prove actual damages caused by a defendant's infringement. *See Ford Motor Co.*, 441 F. Supp. 2d at 852 ("[A] successful plaintiff in a trademark infringement case is entitled to recover enhanced statutory damages even where its actual damages are nominal or non-existent."); *Playboy Enters., Inc. v. Universal Tel-A-Talk, Inc.*, No. 96-6961, 1998 WL 767440, at \*8 (E.D. Pa. Nov. 3, 1998) (awarding statutory damages where plaintiff failed to prove actual damages or profits). The option of a statutory damages remedy in trademark counterfeiting cases is sensible given evidence of a defendant's profits in such cases is frequently almost impossible to ascertain. *See, e.g.*, S. Rep. No. 104-177, pt. V § 7, at 10 (1995) (discussing purposes of Lanham Act statutory damages); *PetMed Express, Inc.*, 336 F. Supp. 2d at 1220 (statutory damages are "[e]specially appropriate in default judgment cases due to infringer nondisclosure" (citations omitted)). This case is no exception.

Here, the allegations of the Complaint and the evidence establish that Defendants intentionally copied one or more of Plaintiffs' Marks for the purpose of deriving the benefit of Plaintiffs' world-famous reputation. Defendants have defaulted on Plaintiffs' allegations of willfulness. *See* Compl. ¶ 111; *Arista Records, Inc. v. Beker Enters., Inc.*, 298 F. Supp. 2d 1310, 1313 (S.D. Fla. 2003) (finding a court may infer willfulness from the defendants' default); *PetMed Express, Inc.*, 336 F. Supp. 2d at 1217 (stating that upon default, well-pleaded allegations are taken as true). As such, the Lanham Act permits the Court to award up to \$2,000,000.00 per infringing mark on each type of good as statutory damages to ensure Defendants do not continue their intentional and willful counterfeiting activities.

The only available evidence demonstrates that each Defendant promoted, distributed, advertised, offered for sale, and/or sold at least one (1) type of good bearing at least one (1) mark which is a counterfeit of one of Plaintiffs' Marks protected by federal trademark registrations. *See* Compl. ¶¶ 24, 34, 44, 54, 64, 74, 84, 94, 104, 127; Luther Decl. ¶¶ 85–87. Based on the above considerations, Plaintiffs have asked the Court to award statutory damages in the amount of \$1,000,000.00 against each Defendant. *See* Mot. at 15–16. The award should be sufficient to deter Defendants and others from continuing to counterfeit or otherwise infringe Plaintiffs' trademarks, compensate Plaintiffs, and punish Defendants, all stated goals of 15 U.S.C. section 1117(c). The Court finds that this award of statutory damages falls within the permissible range under 15 U.S.C. section 1117(c) and is just. *See Fendi S.R.L. v. Joe Bag*, No. 19-61356, 2019 WL 4693677 (S.D. Fla. Aug. 28, 2019) (awarding plaintiff \$1,000,000.00 against each defendant); *Adidas AG v. Global Online Shopping*, No. 19-61180, 2019 WL 7708518 (S.D. Fla. Sept. 23, 2019) (awarding plaintiff \$1,000,000.00 against each defendant); *Louis Vuitton Malletier v. lv2014.skrar*, No. 19-61015, 2019 WL 4731948 (S.D. Fla. Aug. 21, 2019) (awarding plaintiff \$1,000,000.00 against

each defendant); *Abercrombie & Fitch Trading Co. v. Artemis Gesdy*, No. 19-60287, 2019 WL 4693557 (S.D. Fla. July 10, 2019) (awarding plaintiff \$1,000,000.00 against each defendant); *Fendi S.R.L. v. socjmkfn*, No. 19-61356, 2019 WL 4693677 (S.D. Fla. Aug. 28, 2019) (awarding plaintiff \$1,000,000.00 against each defendant); *Goyard St Honore v. Agote*, No. 17-62276, 2018 WL 2006870 (S.D. Fla. Apr. 19, 2018) (awarding plaintiff \$1,000,000.00 against each defendant); *Specialized Bicycle Components, Inc. v. 17 No.1-Own*, No. 17-61201, 2017 WL 3016929 (S.D. Fla. July 14, 2017) (awarding plaintiff \$1,000,000.00 against each defendant).

Plaintiffs' Complaint also sets forth a cause of action for cybersquatting pursuant to the ACPA, 15 U.S.C. section 1125(d).<sup>3</sup> As admitted by default, and established by the evidence submitted, Defendant Numbers 1–6 have acted with the bad-faith intent to profit from at least one of Plaintiffs' Marks and the goodwill associated with Plaintiffs' Marks by registering their respective Subject Domain Names which are identical, confusingly similar to, or dilutive of at least one of Plaintiffs' Marks ("Cybersquatted Subject Domain Names"). *See* Compl. ¶¶ 113–119, 141–144; Mot. at 27 ("Schedule B"). The Cybersquatted Subject Domain Names incorporate at least one of Plaintiffs' trademarks in its entirety surrounded by a descriptive or generic term, rendering the domain name nearly identical to at least one of Plaintiffs' trademarks.

Upon a finding of liability, the ACPA expressly empowers the Court to "order the forfeiture or cancellation of the domain name or the transfer of the domain name to the owner of the mark." *See* 15 U.S.C. § 1125(d)(1)(c); *Victoria's Cyber Secret Ltd. P'ship v. Secret Catalogue, Inc.*, 161 F. Supp. 2d 1339, 1356 (S.D. Fla. 2001). Accordingly, Plaintiffs Federation, Audemars Piguet, Breitling, Hublot, Omega, Patek Philippe, and LVMH are entitled to the transfer and ownership of

---

<sup>3</sup> The claim for relief for cybersquatting under section 43(d) of the Lanham Act, in violation of 15 U.S.C. section 1125(d) ("Claim 3"), was brought by Plaintiffs Federation, Audemars Piguet, Breitling, Hublot, Omega, Patek Philippe, and LVMH and against Defendant Numbers 1–6 only.

Defendant Numbers 1–6’s Cybersquatted Subject Domain Names because they are confusingly similar to at least one of Plaintiffs’ trademarks.

Additionally, a plaintiff may elect at any time before final judgment to recover actual damages or statutory damages of not less than \$1,000.00 and not more than \$100,000.00 per domain name, as the Court considers just. *See* 15 U.S.C. § 1117(d). Plaintiffs Federation, Audemars Piguet, Breitling, Hublot, Omega, Patek Philippe, and LVMH have elected statutory damages and request in view of Defendant Numbers 1–6’s intentional, wrongful behavior, an award in the amount of \$10,000.00 each for their respective infringing domain names. *See* Mot. 27; *Taverna Opa Trademark Corp. v. Ismail*, No. 08-20776, 2010 WL 1838384, at \*3 (S.D. Fla. May 6, 2010) (awarding \$10,000.00 in statutory damages for domain name at issue). The Court finds this amount is just.

### **CONCLUSION**

For the foregoing reasons, Plaintiffs are entitled to the entry of final default judgment. Accordingly, it is

**ORDERED AND ADJUDGED** that Plaintiffs’ Motion [ECF No. 27] is **GRANTED**. Default final judgment and a permanent injunction shall be entered by separate order.

**DONE AND ORDERED** in Fort Lauderdale, Florida, this \_\_\_ day of \_\_\_\_\_, 2022.

---

**RODOLFO A. RUIZ II**  
**UNITED STATES DISTRICT JUDGE**

**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	l-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	
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	luxurypaneraiasale.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	
75	watchesyoga.io	
76	watchhutuk.com	
77	watch-paradise-1.ru	
77	watch-paradise-1.su	watch-paradise-1.ru
78	wristclone.ru	
79	yupoo.com.ru	yupoobrand.ru
79	yupoobrand.ru	