

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 24-23663-CIV-BLOOM**

GOYARD ST-HONORE,

Plaintiff,

vs.

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

Defendants.

**DECLARATION OF JEAN-LAURENT THIERRY IN SUPPORT OF
PLAINTIFF’S *EX PARTE* APPLICATION FOR ENTRY OF TEMPORARY
RESTRAINING ORDER, PRELIMINARY INJUNCTION, AND
ORDER RESTRAINING TRANSFER OF ASSETS**

I, Jean-Laurent Thierry, state and declare as follows:

1. I am over 18 years of age and have personal knowledge of the truth of the matters set forth herein. I submit this declaration in support of Plaintiff’s *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets (the “Application for Temporary Restraining Order”) against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule “A” attached hereto (“Defendants”). If called as a witness, I could and would testify competently to the following facts set forth below.

2. I am employed by Plaintiff, Goyard St-Honore (“Goyard”) as Chief Executive Officer. Goyard is a foreign business entity organized under the laws of the Republic of France with its principal place of business located at 16 place Vendôme in Paris, France 75001. In my


capacity as Goyard's Chief Executive Officer, I am responsible, in part, for Goyard's trademark and anti-counterfeiting efforts worldwide.



3. As a result, I am fully familiar with most aspects of the manufacture, sale, and distribution of genuine Goyard products, and I have been trained to identify the distinctions between genuine merchandise and counterfeit copies of the same.

Goyard's Trademark Rights


4. Goyard is engaged in the manufacture, promotion, distribution, and sale in interstate commerce, including within this judicial district, of high-quality products under the Federally Registered trademarks identified in Paragraph 5 below.

5. Goyard is, and at all times relevant hereto has been, the owner of all rights in and to the following trademarks, which are valid and registered on the Principal Register of the United States Patent and Trademark Office (collectively the "Goyard Marks"):

Trademark	Registration Number	Registration Date	Class / Goods
	1,709,953	August 25, 1992	IC 016 – Office requisites; namely, agendas and spare sheets therefor, repertories, desk pads, pen holders, stamp boxes for the storage of postage stamps, writing pads, address pads, pencil jars for desk use, ink wells, mail trays for desk use, note books, check cases and pen cases. IC 018 – Articles of fancy leather, leather, cloth and skin articles; namely, valises, travel trunks, cosmetic cases, travelling bags, handbags, brief cases, attache cases, brief case type document cases, toilet cases sold empty, makeup cases sold empty, sewing cases, wallets, hat boxes for travel, business card cases, key cases, drawstring pouches, garment bags for travel, necktie cases, jewel


Trademark	Registration Number	Registration Date	Class / Goods
			cases, umbrellas, saddle covers, cloth carriers, articles for dogs; namely, dog collars, dog leashes, dog clothes and carrying bags.
GOYARD	1,821,224	February 15, 1994	<p>IC 016 – Office requisites; namely, agendas, repertories, note books, check cases and pen cases.</p> <p>IC 018 – Articles of fancy leather, leather, cloth and skin articles; namely, valises, travel trunks, cosmetic cases sold empty, traveling bags, handbags, briefcases, attache cases, briefcase type document cases, toilet cases sold empty, make-up cases sold empty, wallets, hat boxes for travel, business card cases, key cases, draw string pouches, garment bags for travel, necktie cases, umbrellas, saddlebags, saddle covers, and articles for dogs; namely, dog collars, dog leashes, dog clothes and carrying bags.</p>
 (E. Goyard Honore Paris)	3,418,288	April 29, 2008	IC 018 – Bags and traveling sets, namely, traveling bags; garment bags for travel; luggage trunks; valises, vanity cases sold empty, rucksacks, handbags, beach bags, school bags; suitcases, briefcases, pocket wallets, purses, not of precious metal, leather key cases; business card cases; umbrellas, parasols, walking sticks.
	4,036,898	October 11, 2011	<p>IC 003 – Toilet soap; perfumes; eau de toilette and eau de cologne; cosmetic preparations; essential oils for personal use; cosmetic milks; lotions for face and body care; cosmetic creams; emulsions for cosmetic use; shampoos; gels to be used on the face and body for aesthetic purposes; deodorants for personal use.</p> <p>IC 009 – Spectacles; spectacle frames; sunglasses; spectacle cases;</p>

Trademark	Registration Number	Registration Date	Class / Goods
			<p>photographic apparatus, namely, cameras.</p> <p>IC 014 – Precious metals and their alloys, other than for dental use; goods made of precious metals and their alloys, other than for dental use, in the nature of jewelry, namely, rings, earrings, bracelets, charms, chains, watch chains, necklaces, pins, ornaments, fashion pins, ring bands; goods made of precious metals and their alloys, other than for dental use, namely, buckles of precious metal, hat ornaments of precious metal, jewellery cases of precious metal, jewellery caskets of precious metal; jewellery, precious stones, semi-precious stones, jewelry in the nature of pearls, horological and chronometric instruments; watches, watch straps, wristwatches; boxes for watches, jewelry boxes; cuff links.</p> <p>IC 018 – Goods of leather and imitations of leather, namely, travelling bags, travelling sets comprised of luggage, and garment bags for travel; trunks; suitcases; unfitted vanity cases; rucksacks; handbags; sports bags; beach bags; school bags; attaché cases; document cases; briefcases; school satchels; under-arm bags, namely, handbags; leather goods, namely, wallets, purses not of precious metal, leather key cases, card holders for wallets; umbrellas; parasols; sunshade parasols; walking sticks.</p> <p>IC 024 – Fabrics for textile use; textile goods, namely, bath linen not for clothing, household linen, bed linen,</p>

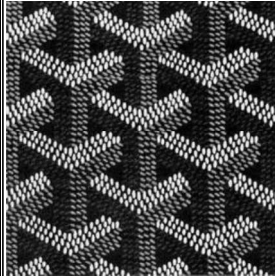
Trademark	Registration Number	Registration Date	Class / Goods
			<p>textile table linen, bathroom linen of textile, handkerchiefs of textile.</p> <p>IC 025 – Clothing for men, women and children, namely, dresses, skirts, petticoats, culottes, ladies' suits, trousers, shorts, Bermuda shorts, swimming drawers, shirts, ladies' shirts, blouses, tee-shirts, sweatshirts, waistcoats, jackets, cardigans, pullovers, sweaters, parkas, anoraks, coats, gaberdines, raincoats, furs, sashes for wear, shawls, scarf, gloves, neckties, belts, socks, stockings, tights, underwear, pajamas, dressing gowns, swimsuits, bath robes; footwear, except orthopedic footwear, namely, shoes, sandals, boots, half-boots, boot liners, slippers; hats, berets, caps.</p> <p>IC 028 – Games, namely, chess games; gymnastic and sporting articles not included in other classes, namely, baseball gloves, bats for games, boxing gloves, golf gloves, golf clubs, golf bags; decorations for Christmas trees.</p>
	5,532,309	August 7, 2018	<p>IC 009 – Spectacles, sunglasses, spectacle cases, spectacle frames, spectacle cords; protective cases for portable telephones, tablet computers, electronic diaries and computers; portable telephones shell cases, portable telephone straps; cases especially made for photographic apparatus and instruments; binoculars being optics; cases for binoculars; magnifying glasses being optics; cases for magnifying glasses; digital photo frames; blank USB flash drives; mouse pads; barometers; dog whistles, cases for dog whistles.</p>

Trademark	Registration Number	Registration Date	Class / Goods
			<p>IC 014 – Jewelry, namely, finger rings, key rings, earrings, cufflinks, cases for cuff links, bracelets, charms, brooches, jewelry chains, necklaces, presentation boxes for jewelry, ornaments being jewelry, medallions being jewelry, jewelry boxes; tie pins, tie clips; timepieces and chronometric apparatus and instruments, namely, watches, straps for wrist watches, presentation boxes for watches, cases being parts of watches, alarm clocks; boxes of precious metals, their alloys or coated therewith.</p> <p>IC 016 – Printed matter, namely, posters, photo albums, greeting cards, postcards; printed matter, namely, books, magazines, orientation manuals, photographs, periodicals in the field of leather goods, travel goods, leather accessories and bags, pet accessories, clothing and fashion accessories; checkbook holders; products made of cardboard or paper, namely, boxes of cardboard or paper, hat boxes of cardboard, bags being envelopes and pouches of cardboard or paper for packaging, paper table cloths, perfumed and non-perfumed drawer liners of paper, money clips, passport holders, table napkins of paper; office requisites excluding furniture, namely, diaries, stationery pads, notebooks, binders, cases for stamps, cases for stationery, paper knives, diary covers being stationery, letter trays, writing sets comprising inkstands and stationery, envelopes being stationery, shields being paper seals, writing paper, trays for sorting and counting money, document holders, paperweights, telephone indexes, desk pads, stamps, namely, sealing stamps; writing</p>

Trademark	Registration Number	Registration Date	Class / Goods
			<p>instruments, namely, pens, ball-point pens, propelling pencils, pencil holders, pencil cases.</p> <p>IC 018 – Products made of leather or imitations of leather, namely, straps of leather, leather leashes, boxes of leather or imitation leather, wallets of leather or imitation leather, briefcases of leather; traveling trunks, traveling bags, leather traveling sets, namely, leather cases and pouch sets for travel, garment bags for travel; trunks, attache cases, suitcases; unfitted vanity cases, backpacks, handbags, beach bags, sports bags, bags for carrying animals, briefcases, purses, wallets, coin purses, key cases being leather products, card cases being wallets, credit card holders being wallets; umbrellas, umbrella sticks, walking sticks, walking stick seats, collars for animals, animal leashes; clutch bags.</p> <p>IC 024 – Fabrics and textile products, namely, textile wall hangings, household linen, bed linen, table linen of textile, bath linen except clothing, handkerchiefs of textile, covers for cushions, unfitted fabric chair covers, traveling rugs, lap robes.</p> <p>IC 024 – Clothing, namely, suspenders, belts being clothing, neckties, socks, shawls, sashes for wear, scarves, gloves, bathing suits, bath robes, pocket squares being clothing; footwear, namely, sandals, boots, slippers; headgear, namely, hats, berets, caps being headwear.</p>


Trademark	Registration Number	Registration Date	Class / Goods
	5,742,053	May 07, 2019	<p>IC 009 – Spectacles; sunglasses; spectacle cases; spectacle frames; spectacle cords; protective cases for mobile telephones, tablets, electronic diaries and computers; mobile telephone shell cases; mobile telephone straps; cases especially made for photographic apparatus and instruments; binoculars; cases for binoculars; magnifying glasses; cases for magnifying glasses; digital photo frames; USB flash drives sold blank; mouse pads; barometers; dog whistles; cases for dog whistles</p> <p>IC 014 – Jewelry, namely, finger rings, key rings, earrings, bracelets, charms being jewelry, brooches, chains being jewelry, necklaces, presentation boxes for jewelry, ornaments of precious metal in the nature of jewelry, medallions; cuff links; cases for cuff links; jewelry boxes; tie pins; tie clips; time pieces; chronometric apparatus and instruments, namely, watches; watch bands; watch cases; presentation cases for watches; alarm clocks; boxes of precious metals, their alloys or coated therewith; all the aforesaid goods of French origin or made in France</p> <p>IC 016 – Printed matter, namely, posters, photograph albums, greeting cards, postcards; printed matter, namely, books, magazines, orientation manuals, periodicals all featuring fashion information relating to leather goods, travel products, leather accessories and bags, pet accessories, clothing and fashion accessories; photographs; checkbook holders; products made of cardboard or paper, namely, boxes of cardboard or paper, hat boxes of cardboard, bags being pouches of</p>

Trademark	Registration Number	Registration Date	Class / Goods
			<p>cardboard or paper for packing; paper table cloths; perfumed and non-perfumed drawer liners of paper; money clips; passport holders; table napkins of paper; office requisites, not being furniture, namely, diaries, stationery pads, notebooks, binders, cases for stamps, cases for stationery, paper knives, diary covers being stationery, letter trays, writing sets comprised of inkstands and stationery, envelopes being stationery, shields being paper seals, writing paper, trays for sorting and counting money, document holders, paper weights, telephone indexes, desk pads, stamps; writing instruments, namely, pens, ball-point pens, propelling pencils, pencil holders, pencil cases</p> <p>IC 018 – Products made of leather or imitations of leather, namely, straps in the nature of belts of leather, leather leashes, boxes of leather or imitation leather, wallets of leather or imitation leather, briefcases of leather; traveling trunks; traveling bags; travelling sets consisting of leather cases and pouch sets for travel; garment bags for travel; trunks; attaché cases, suitcases; vanity cases sold empty; backpacks; handbags; beach bags; sports bags; bags for carrying animals; briefcases; purses; wallets; coin purses; key cases of leather; card cases being wallets; credit card holders being wallets; umbrellas; umbrella sticks; walking sticks; walking stick seats; collars for animals; leashes for animals; clutch bags; all the aforesaid goods of French origin or made in France</p> <p>IC 024 – Fabrics and textile products, namely, textile wall hangings,</p>

Trademark	Registration Number	Registration Date	Class / Goods
			<p>household linen, bed linen, table linen of textile, bath linen not being clothing, handkerchiefs of textile, covers for cushions, unfitted chair covers not of paper, traveling rugs, lap robes</p> <p>IC 025 – Clothing, namely, suspenders, belts being clothing, neckties, socks, shawls, sashes for wear, scarves, gloves, bathing suits, bath robes, pocket squares; footwear, namely, sandals, boots, slippers; headgear, namely, hats, berets, caps being headwear; all the aforesaid goods of French origin or made in France</p>
	5,753,841	May 21, 2019	<p>IC 003 – Cosmetic kits comprised of non-medicated cosmetics, perfumes, eaux de toilette, scented linen waters, essential oils for personal use; fumigation products, namely, incenses; soaps, namely, skin soaps; cosmetic preparations for toilet use and beauty care, namely, cosmetic preparations for body care and skin care; shoe polish, creams for leather</p> <p>IC 009 – Spectacles; sunglasses; spectacle cases; spectacle frames; spectacle cords; protective cases for portable telephones, tablets, electronic diaries and computers; cases for portable telephones, portable telephone straps; cases especially made for photographic apparatus and instruments; binoculars; cases for binoculars; magnifying glasses; cases for magnifying glasses; digital photo frames; USB flash drives sold blank; mouse pads; barometers; dog whistles; cases for dog whistles</p> <p>IC 014 – Jewelry, namely, finger rings,</p>

Trademark	Registration Number	Registration Date	Class / Goods
			<p>key rings, earrings, cuff links, cases for cuff links, bracelets, charms, brooches, chains, necklaces, jewelry caskets, ornamental lapel pins, jewelry medallions; jewelry boxes; tie pins, tie clips; timepieces; chronometric instruments and apparatus, namely, watches, watchbands, cases for watches, alarm clocks; boxes of precious metals, their alloys or coated therewith</p> <p>IC 016 – Printed matter, namely, posters, photo albums, greeting cards, postcards; printed matter, namely, books, magazines, orientation manuals and periodicals in the field of leather goods, travel goods, leather accessories and bags, pet accessories, clothing and fashion accessories, photographs; checkbook holders; products made of cardboard or paper, namely, boxes of cardboard or paper, hat boxes of cardboard, bags, namely envelopes and pouches of cardboard or paper for merchandise packaging; paper table cloths; perfumed and non-perfumed drawer liners of paper; money clips; passport holders; table napkins of paper; office requisites, excluding furniture, namely, diaries, stationery writing pads, notebooks, binders, cases for stamps, cases for stationery, paper knives, covers for stationery diaries, letter trays, writing sets comprised of inkstands and stationery, stationery envelopes, shields being paper seals, writing paper, trays for sorting and counting money, document holders, paperweights, telephone indexes, desk pads, postage stamps; writing instruments, namely, pens, ball-point pens, propelling pencils, pencil holders, pencil cases</p>

Trademark	Registration Number	Registration Date	Class / Goods
			<p>IC 018 – Goods made of leather or imitations leather, namely, leather shoulder straps, leather cords; leather or imitation leather boxes; leather or imitation leather small handbags; leather briefcases; travel trunks; travel bags; leather cases and pouch sets for travel; garment bags for travel; travelling trunks, attaché cases, suitcases; vanity cases sold empty; backpacks; handbags; beach bags; sports bags; bags for carrying animals; briefcases; wallets; purses; coin purses; leather goods, namely, key cases; card holders in the nature of a wallet; credit card holders in the name of a wallet; umbrellas, umbrella sticks; walking sticks; walking stick seats; collars for animals; animal leashes; clutch bags</p> <p>IC 021 – Soap boxes; glass bottles sold empty; drinking bottles; bowls; tea sets, tea caddies, picnic baskets sold empty; shoe brushes; eyebrow brushes; toilet brushes; nail brushes</p> <p>IC 024 – Fabrics and textile products, namely, textile wall hangings, household linen, bed linen, textile table linen, bath linen, excluding clothing; textile handkerchiefs; covers for cushions; unfitted chair covers; travel blankets; lap robes</p> <p>IC 025 – Clothing, namely, suspenders, belts, neckties, socks, shawls, sashes for wear, scarves, gloves, bathing suits, bath robes, pocket squares; clothing, namely, footwear, sandals, boots, slippers; headwear, namely, hats, berets, caps</p> <p>IC 028 – Parlor games; toys for pets; playing cards; ornaments for Christmas</p>

Trademark	Registration Number	Registration Date	Class / Goods
			trees, except illumination articles and confectionery; golf bags with or without wheels; bags and covers for tennis rackets; covers for petanque balls
	6,641,574	February 15, 2022	<p>IC 009 – Spectacles, sunglasses, spectacle cases, spectacle frames, spectacle accessories namely spectacle cords; protective cases and accessories for mobile telephones, tablets, electronic agendas, and computers namely hand free mobile phone kits, mobile phone earphones, protective cases for mobile phone earphones, special holders for mobile phone, tablets and computers; portable telephones shell cases, portable telephone straps; cases especially made for photographic apparatus and instruments; binoculars used for optics, cases for binoculars; magnifying glasses used for optics, cases for magnifying glasses; digital photo frames; blank USB flash drives; mouse pads; barometers; dog whistles, cases for dog whistles</p> <p>IC 014 – Jewelry, namely, finger rings used as jewelry; key rings; earrings; cuff links; cases for cuff links; bracelets used as jewelry; charms; brooches; chains used as jewelry; necklaces; jewelry caskets; ornaments in the nature of jewelry; medallions in the nature of jewelry; jewelry boxes; tie pins; tie clips; timepieces; chronometric instruments and apparatus, namely, watches; watchbands; cases for watches; boxes for watches; alarm clocks; boxes of precious metals, their alloys or coated therewith</p> <p>IC 024 – Fabric and textile goods, namely, wall hangings of textile</p>

Trademark	Registration Number	Registration Date	Class / Goods
			materials; household linen; bed linen; table linen of textile materials; bath linen with the exception of clothing; beach towels; handkerchiefs of textile materials; cushion covers; unfitted fabric chair covers; traveling rugs; lap robes IC 025 – Clothing, namely, suspenders, belts being clothing, socks, neckties, shawls, long scarves, scarves, gloves, bathing suits, bathrobes, pocket squares being clothing; footwear being clothing, namely, sandals, boots, slippers; headwear, namely, hats, berets, caps
GOYARD	7,008,371	March 28, 2023	IC 009 – Spectacles, sunglasses, spectacle cases, spectacle frames, spectacle cords; protective cases for portable telephones, tablets, electronic diaries and computers; portable telephones shell cases, portable telephone straps; cases especially made for photographic apparatus and instruments; binoculars used for optics, cases for binoculars; magnifying glasses used for optics; cases for magnifying glasses; digital photo frames; blank USB flash drives; mouse pads; barometers; dog whistles, cases for dog whistles

The Goyard Marks are used in connection with the manufacture and distribution of high-quality goods in the categories identified above. True and correct copies of the Federal Registrations for each of the Goyard Marks listed above are attached to the Complaint as Composite Exhibit “1.”

6. Genuine Goyard products are sold exclusively in the United States at Goyard operated in-store boutiques and in multiple other countries throughout the world in stand-alone boutiques. Additionally, genuine Goyard products are marketed and promoted on the Internet

exclusively via www.goyard.com. Goyard products are never sold to wholesalers, via the Internet, or through factory outlets. Goyard extensively uses the Goyard Marks in the United States in association with the sale of high-quality products and has used the Goyard Marks in interstate commerce to identify and distinguish Goyard products for an extended period of time. In the last five years alone, Goyard has experienced substantial sales of its high-quality goods.

7. As a result of the foregoing, the Goyard Marks have acquired fame in the consumer market for a wide variety of goods. The Goyard Marks serve as symbols of Goyard's quality and reputation, and have come to symbolize the enormous goodwill of Goyard's business throughout the United States and the world. No other manufacturer lawfully uses the Goyard Marks or any substantially similar marks for similar types of goods. The Goyard Marks have never been abandoned. Goyard actively polices and enforces its trademark rights.

8. The Goyard Marks are vital to Goyard's business, as the trademarks represent a significant value to Goyard's overall business and associated image. Goyard 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 identical or substantially similar trademarks.

Investigation of Defendants' Counterfeiting Activities

9. Goyard learned Defendants are promoting, advertising, offering for sale and/or selling various products bearing and/or using counterfeit and infringing trademarks that are exact copies of one or more of the Goyard Marks, without authorization, via the Internet based e-commerce stores operating under the seller names identified on Schedule "A" hereto (the "E-commerce Store Names"). The Goyard Marks have never been assigned or licensed to Defendants, and Defendants do not have, nor have they ever had, the right or authority to use the Goyard Marks

for any purpose. Further, the Goyard Marks have never been assigned or licensed to be used in connection with any of the E-commerce Store Names.

10. Goyard retained Invisible Inc, a licensed private investigative firm, to investigate the suspected sales of counterfeit and infringing Goyard branded products by Defendants and to document the available payment account data for receipt of funds paid to Defendants for the sale of counterfeit Goyard branded products.

11. Invisible Inc accessed the Internet based e-commerce stores operating under each of the E-commerce Store Names and placed an order for the purchase of a product bearing and/or using counterfeits of, at least, one of the Goyard Marks at issue in this action from each Defendant. At the conclusion of the process, I received detailed web page captures of the Goyard branded goods ordered by Invisible Inc. (See Declaration of Kathleen Burns in Support of Plaintiff's Application for Temporary Restraining Order ¶ 4 and Composite Exhibit "1" attached thereto.)

12. Goyard reviewed and visually inspected the Goyard branded goods offered for sale and ordered by Invisible Inc by reviewing the e-commerce stores operating under the E-commerce Store Names or the detailed web page captures thereof, and determined the products are non-genuine, unauthorized Goyard branded products. Goyard reached this conclusion through visual inspection of the product images, the pricing of the Goyard branded products listed, which are far below the prices of similar genuine Goyard products, and the observation of certain product and marking characteristics, which are not consistent with those found on genuine Goyard products. Moreover, I personally know Goyard does not conduct business with Defendants or their e-commerce stores, nor have the Goyard Marks ever been assigned or licensed to be used by Defendants or the Internet based e-commerce stores operating under the E-commerce Store Names.

13. In view of the foregoing, I can confirm the Goyard branded products ordered by Invisible Inc via the Internet based e-commerce stores operating under the E-commerce Store Names are non-genuine, unauthorized Goyard products. Additionally, I can confirm Defendants do not have authorization to use the Goyard Marks or name in connection with any of the E-commerce Store Names.

Harm Caused to Goyard by Defendants' Activities

14. Genuine Goyard branded goods are widely legitimately advertised, promoted, offered for sale, and discussed by Goyard, its authorized distributors, and unrelated third parties via the Internet.

15. Visibility on the Internet, particularly via Internet search engines, is important to Goyard's overall marketing and consumer education efforts. Thus, Goyard expends significant monetary and other resources on Internet marketing and consumer education regarding its products, including search engine optimization ("SEO"), search engine marketing ("SEM"), which allow Goyard, its authorized retailers, and others to educate consumers fairly and legitimately about the value of the Goyard brand and the goods sold thereunder and the problems associated with the counterfeiting of Goyard's trademarks.

16. Each year, Goyard expends significant monetary resources in connection with trademark enforcement efforts, including legal fees, investigative fees, and support mechanisms for law enforcement.

17. Each individual counterfeiter's actions, alone, cause Goyard irreparable harm. However, the sheer number of counterfeit e-commerce store operators acts as a force multiplier of those individual harms and creates a massive single reputation harm to Goyard. As such, Goyard faces significant economic and logistical challenges in enforcing its 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 Goyard caused by the crushing weight of all of Defendants' simultaneous counterfeiting.

18. During its investigation, Goyard has 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 e-commerce store registrations and on their e-commerce stores 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 multiple storefronts that appear unrelated to evade detection or complete closure of their entire operation once they are detected. Plaintiffs, such as Goyard, 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, Goyard 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.

19. Additionally, even after detection, online counterfeiters often simply set up shop elsewhere quickly and easily, before Goyard's 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 Goyard 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, Goyard would be left filing large numbers of lawsuits often against the same sellers over and over without ever obtaining any meaningful relief.

20. Goyard regularly sees repeat offenders in unrelated matters or multiple 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 Goyard puts into developing and marketing its products. Defendants, in cases such as this, simply steal the latest designs, slap together a storefront, and begin competing *en masse* with Goyard on its own products across dozens of e-commerce stores.

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

22. By benefiting from advertising and market targeting strategies based upon an unlawful use of the Goyard Marks online, Defendants are jointly obliterating the otherwise open and available marketplace space in which Goyard has the right to fairly market its goods and associated message. Specifically, Defendants use Goyard’s name and trademarks, or variations thereof, to make their e-commerce stores selling illegal goods appear more relevant and attractive to consumers searching for Goyard related goods and information online. Such concurrent wrongful use of Goyard’s trademarks directly impairs Goyard’s ability to compete for visibility on the World Wide Web, including within search engine results space.

23. The combined force of Defendants' unlawful actions is contributing to the creation and maintenance of an illegal marketplace operating in parallel to the legitimate marketplace for Goyard's genuine goods. Defendants are causing individual, concurrent and indivisible harm to Goyard and the consuming public by (i) depriving Goyard and other third parties of the ability to fairly compete for space online and within search engine results and reducing the visibility of Goyard's genuine goods on the World Wide Web, (ii) causing an overall degradation of the value of the goodwill associated with the Goyard Marks, by viewing inferior products in either the pre or post sale setting, (iii) increasing Goyard's overall cost to market its goods and educate consumers about its brand via the Internet, and/or (iv) creating and maintaining an illegal marketplace using the Web, which perpetuates the ability of Defendants to confuse consumers and harm Goyard with impunity.

24. As a result of the availability of the non-genuine Goyard branded goods being offered for sale by Defendants, Goyard is highly likely to experience irreparable damage to its reputation 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: 2024-09-23 at Paris, France.

Jean-Laurent Thierry

Jean-Laurent Thierry
Chief Executive Officer, Goyard St-Honore

SCHEDULE “A”
DEFENDANTS BY NUMBER AND E-COMMERCE STORE NAME

Defendant No.	Defendant/ E-commerce Store Name
1	goyardbagus.com
2	goyarduksale.com
3	aaareplica.nu
4	bagscoll.shop
4	blissbags.shop
4	luxesbag.shop
4	topbagsnew.shop
5	buyqualitybags.com
5	topqualitybags.com
6	byaneity.com
7	casebig.com
8	casefeely.com
9	caseshunter.com
10	cinderellastores.com
11	crozus.com
12	designermusthave.com
13	qkkbag.shop
13	qnkbag.shop
13	whwlbag.shop
13	wmtbag.shop
13	wshubag.shop
13	xknbag.shop
14	gorchic.com
14	gorchic.us
15	high-endbags01.com
16	jojokkrelicas.com
17	karanfrank.ru
18	luxeebag.com
19	luxuryoubag.com
20	mafoi.shop
21	merchprintz.com
22	peesty.com

22	temaap.com
22	temafes.us
23	racastudyo.com
24	tgey.top
25	theluxhouse.net
26	thetotetrove.myshopify.com
27	vincyrep.ru
28	viokshop.com
29	vittoriaparumbell.com