

**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.

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**PLAINTIFF’S *EX PARTE* APPLICATION FOR ENTRY OF  
TEMPORARY RESTRAINING ORDER, PRELIMINARY INJUNCTION, AND  
ORDER RESTRAINING TRANSFER OF ASSETS  
AND MEMORANDUM OF LAW IN SUPPORT THEREOF**

Plaintiff, Goyard St-Honore (“Goyard”), hereby does apply, on an *ex parte* basis, for entry of a temporary restraining order and an order restraining transfer of assets, and upon expiration of the temporary restraining order, a preliminary injunction against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule “A” hereto (“Defendants”) pursuant to 15 U.S.C. § 1116, Fed. R. Civ. P. 65, The All Writs Act, 28 U.S.C. § 1651(a), and this Court’s inherent authority. In support thereof, Goyard submits the following memorandum of law.

**I. INTRODUCTION**

Defendants are knowingly and intentionally promoting, advertising, distributing, offering for sale, and selling goods bearing and/or using counterfeits and confusingly similar imitations of one or more of Goyard’s registered trademarks within this district and throughout the United States by operating Internet based e-commerce stores under the seller names identified on Schedule “A” hereto (the “E-commerce Store Names”). Specifically, Goyard has obtained evidence clearly demonstrating that Defendants (a) are engaged in the advertising, offering for sale, and sale of counterfeit and infringing versions of Goyard’s goods; and (b) accomplish their sales of counterfeit and infringing goods via the Internet using, at least, the e-commerce stores operating under the E-

commerce Store Names. Based on this evidence, Goyard's Complaint alleges trademark counterfeiting and infringement, false designation of origin, cybersquatting, common law unfair competition, and common law trademark infringement.

Defendants' unlawful activities deprive Goyard of its right to determine the way its trademarks are presented to the public. Indeed, Defendants have and continue to wrongfully trade and capitalize on Goyard's reputation and goodwill and the commercial value of Goyard's trademarks. By their activities, Defendants are defrauding Goyard, certain non-party businesses, and consumers for their own benefit. Defendants should not be permitted to continue their unlawful activities, which are causing Goyard ongoing irreparable harm. Accordingly, Goyard is seeking entry of a temporary restraining order prohibiting Defendants' further wrongful use of Goyard's trademarks.

Goyard also seeks to restrain Defendants' unlawful profits. Goyard has obtained evidence that Defendants use money transfer and retention services with PayPal, Inc. ("PayPal") to accept payment for the sale of their counterfeit products. The Lanham Act allows Goyard to recover the unlawful profits gained through Defendants' distribution and sales of counterfeit and infringing goods. See 15 U.S.C. § 1117(a). Considering the inherently deceptive nature of the counterfeiting business, Goyard has good reason to believe Defendants will hide or transfer their ill-gotten assets beyond the jurisdiction of this Court unless they are restrained. Accordingly, to preserve the disgorgement remedy, and all other equitable remedies available to Plaintiff, Goyard seeks an *ex parte* order restraining Defendants' assets, including specifically, Defendants' funds transmitted through PayPal.

## **II. STATEMENT OF FACTS**

### **A. Plaintiff's Rights.**

Goyard is the owner of all rights in and to the federally registered trademarks identified in Paragraph 5 of the Declaration of Jean-Laurent Thierry in Support of Plaintiff's *Ex Parte* Application for Entry of Temporary Restraining Order (the "Goyard Marks"), which are used in connection with the manufacture and distribution of high-quality goods in the categories identified therein. (See Declaration of Jean-Laurent Thierry in Support of Plaintiff's Application for Temporary Restraining Order ["Thierry Decl."] ¶¶ 4-5, filed herewith; see also United States Trademark Registrations for the Goyard Marks [the "Goyard Trademark Registrations"] attached as Comp. Ex. 1 to the Complaint [DE 1-2], incorporated herein by reference.) The Goyard Marks

are symbols of Goyard's quality, reputation, and goodwill and have never been abandoned. (See Thierry Decl. ¶¶ 6-7.) Moreover, Goyard expends substantial time, money, and other resources developing and otherwise promoting its trademarks. (Id.) Accordingly, the Goyard Marks are famous marks as the term is used in 15 U.S.C. § 1125(c)(1).

Furthermore, Goyard extensively uses, advertises, and promotes the Goyard Marks in the United States in interstate commerce in association with its high-quality goods, and has carefully monitored and policed the use of the Goyard Marks. (See Thierry Decl. ¶¶ 6-8.) As a result of Goyard's efforts, the Goyard Marks have acquired fame in the consumer market. (Id.) The Goyard Marks are widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning. (Id.) The Goyard Marks have come to symbolize the enormous goodwill of Goyard's genuine products throughout the United States. (Id.) At all times relevant hereto, Defendants have been aware of Goyard's (a) ownership of the Goyard Marks; (b) exclusive rights to use such Marks; and (c) substantial goodwill embodied in, and favorable recognition for, the Goyard Marks.

**B. Defendants Wrongfully Use Plaintiff's Trademarks.**

Defendants do not have, nor have they ever had, the right or authority to use the Goyard Marks for any purpose. (Thierry Decl. ¶¶ 9, 12-13.) However, despite their known lack of authority to do so, Defendants are concurrently promoting and otherwise advertising, distributing, offering for sale, and/or selling, through their respective E-commerce Store Names, goods bearing and/or using counterfeit and infringing trademarks that are exact copies of one or more of the Goyard Marks, without authorization ("Defendants' Goods"). (Thierry Decl. ¶¶ 9-13; Declaration of T. Raquel Wiborg-Rodriguez in Support of Plaintiff's Application for Temporary Restraining Order ["Wiborg-Rodriguez Decl."] ¶¶ 2-3, filed herewith; Declaration of Kathleen Burns in Support of Plaintiff's Application for Temporary Restraining Order ["Burns Decl."] ¶ 4, filed herewith; see also relevant web page captures from Defendants' E-commerce Store Names displaying the Goyard branded items offered for sale ["Defendants' E-commerce Store Names"] attached as Comp. Ex. 1 to the Burns Decl.)

Given Defendants' slavish copying of the Goyard Marks, Defendants' Goods offered for sale and sold under identical marks are indistinguishable to consumers, both at the point of sale and post-sale. Additionally, by using the Goyard Marks, Defendants have created a false association between their counterfeit and infringing goods and e-commerce stores and Goyard.

Such false association is in violation of 15 U.S.C. § 1125(a) and is causing and will continue to cause Goyard irreparable injury. (See Thierry Decl. ¶¶ 8, 20.)

As part of its ongoing investigation regarding the sale of counterfeit and infringing products, Goyard's counsel retained Invisible Inc ("Invisible"), a licensed private investigative firm, to investigate the promotion and sale 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. (Thierry Decl. ¶ 10; Burns Decl. ¶ 3; Wiborg-Rodriguez Decl. ¶ 2.) Invisible accessed Defendants' Internet based e-commerce stores operating under their respective E-commerce Store Name, placed an order for the purchase of a product from each e-commerce store bearing and/or using counterfeits of, at least, one of the Goyard Marks at issue and requested the products be shipped to an address in the Southern District of Florida.<sup>1</sup> (See Burns Decl. ¶ 4.) Each order was processed entirely online, and following the submission of the orders, Invisible documented the information<sup>2</sup> for finalizing payment<sup>3</sup> for the products ordered from Defendants to their payment account data identified on Schedule "A."<sup>4</sup> (See Burns Decl. ¶ 4 and Comp. Ex. 1 thereto.) At the conclusion of the process, the detailed web page captures of the various Goyard branded products ordered via Defendants' E-commerce Store Names were sent to Goyard's representative, Jean-Laurent Thierry, for inspection. (See Burns Decl. ¶ 4; Thierry Decl. ¶ 11; Wiborg-Rodriguez Decl. ¶ 2.)

Goyard's representative, Jean-Laurent Thierry, who has the ability to identify the distinctions between genuine Goyard branded merchandise and counterfeit copies of the same, reviewed and visually inspected the Goyard branded goods offered for sale and ordered by

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<sup>1</sup> Certain Defendants use their E-commerce Store Names in tandem with electronic communication via private messaging applications and/or services in order to complete their offer and sale of counterfeit and infringing Goyard-branded products. (Burns Decl. ¶ 4 n.1.)

<sup>2</sup> Defendants use money transfer and retention services with PayPal, Inc. ("PayPal") as a method to receive monies generated through the sale of counterfeit products. (See Burns Decl. ¶ 4, n.2; Wiborg-Rodriguez Decl. ¶ 5.)

<sup>3</sup> Invisible did not transmit the funds to finalize the sale for the orders to avoid adding money to Defendants' coffers. (See Wiborg-Rodriguez Decl. ¶ 2 n.1; Burns Decl. ¶ 4 n.3.)

<sup>4</sup> Certain Defendants also provided contact e-mail addresses in connection with their E-commerce Store Names, which are included on Schedule "A" hereto. (See Wiborg-Rodriguez Decl. ¶ 3; Burns Decl. ¶ 4 n.4.)

Invisible by reviewing the Internet based e-commerce stores operating under each of the E-commerce Store Names or the detailed web page captures thereof, and determined the products were not genuine versions of Goyard's goods. (Thierry Decl. ¶¶ 12-13.)

Section 45 of the Lanham Act defines a "counterfeit" as "a spurious mark which is identical with, or substantially indistinguishable from, a registered mark." 15 U.S.C. § 1127. Also, using the "ocular test" of direct comparison, courts have found that even marks that are slightly modified from the registered marks copied are to be considered counterfeit marks. See Fimab-Finanziaria Maglificio vs. Helio Import/Export, Inc., 601 F. Supp. 1 (S.D. Fla. 1983). A comparison of the Goyard Marks to the marks used by Defendants in connection with the promotion and sale of Defendants' Goods reveals the obvious counterfeit and infringing nature of Defendants' Goods. (Compare Goyard's Trademark Registrations [Comp. Ex. 1 to the Compl.] with Defendants' E-commerce Store Names [Comp. Ex. 1 to the Burns Decl.].) Defendants' Goods are being promoted, advertised, offered for sale, and sold by Defendants to consumers within this district and throughout the United States. (See Burns Decl. ¶ 4.) Defendants are profiting by preying upon consumers, many of whom have no knowledge Defendants are defrauding them. Defendants' activities amount to nothing more than unlawful operations, infringing on Goyard's intellectual property rights. The E-commerce Store Names and associated payment accounts are a substantial part of how Defendants further their scheme and cause harm to Goyard.

**C. Defendants Unfairly Compete with and Cause Indivisible Harm to Plaintiff.**

Defendants are all using counterfeits and infringements of Goyard's famous name and the Goyard Marks to make their e-commerce stores appear more relevant and attractive to consumers shopping for genuine Goyard products online. While each Defendant causes direct individual harm to Goyard, the combined effect of Defendants' unlawful activities functions as a force multiplier to cause Goyard a single indivisible harm. (Thierry Decl. ¶ 17.) In other words, they are all logically part of the same occurrence. Defendants are therefore properly joined in this action pursuant to Fed. R. Civ. P. 20. See Bose Corp. v. The P'ships and Unincorporated Ass'ns Identified on Schedule "A", 334 F.R.D. 511 (N.D. Ill. Feb. 19, 2020) (holding that the combined effect of the individual harm suffered by a plaintiff from online counterfeiters creates injuries to the plaintiff in the aggregate constituting an occurrence under Rule 20.)

Specifically, 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. (Thierry Decl. ¶ 14.) Visibility on the Internet, particularly via search engines is important to Goyard's overall marketing and consumer education efforts. (Id. at ¶ 15.) Goyard expends significant resources on Internet marketing and consumer education regarding its products, including search engine optimization ("SEO") and search engine marketing ("SEM"), which allow Goyard and others to fairly educate consumers about the value associated with the Goyard brand and the goods sold thereunder. (Id.; see also Compl. ¶ 23.)

Counterfeiters like Defendants embrace similar marketing strategies to Goyard and are concurrently leveraging it to cause greater and more significant harm to Goyard. The combination of all Defendants engaging in the same exact illegal activity for the same purpose over the same time span causes Goyard irreparable harm in a way that the individual actions occurring alone might not. See, e.g., Bose Corp., 334 F.R.D. at 517 ("[Plaintiff] does not perceive any one counterfeiter to be the problem. Each injury by itself is relatively inconsequential to [Plaintiff]. Rather, it is the injuries in the aggregate . . . that is harmful and from which [Plaintiff] seeks shelter.") Defendants are jointly and concertedly harming Goyard's marketing efforts on the Internet by blocking and consistently increasing the cost of online visibility for Goyard's legitimate, authorized e-commerce website. (Thierry Decl. ¶ 23.) Moreover, the combination of Defendants' unlawful activities increases Plaintiff's cost to market its genuine goods and educate consumers about its brand. Id.; see Bose Corp., 334 F.R.D. at 517 ("[Seeking relief against each member of the swarm one by one defies common sense, because it is the swarm—the fact that all Defendants are attacking at once—that is the defining aspect of the harm from which [Plaintiff] seeks relief.".)

Defendants, each of whom is likely aware of the existence of the illegal marketplace and the activities of the others to perpetuate the same, are combining the force of their actions to cause individual, concurrent, and indivisible harm to Goyard and consumers. (See Thierry Decl. ¶¶ 17-18; Compl. ¶¶ 33-34.) See also Bose Corp., 334 F.R.D. at 517 ("Joinder of all defendants who are part of the swarm attacking [Plaintiff's] trademarks flows easily from conceptualizing the swarm as the relevant Rule 20 'occurrence.'") By engaging in market building strategies based upon an illegal use of the Goyard Marks, Defendants are obliterating the otherwise open and available marketplace space in which Goyard has the right to fairly market its goods and associated message. Through their combined concurrent actions, 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 (the "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 (iv) creating and maintaining an illegal marketplace using the Web, which perpetuates the ability of Defendants to confuse consumers and harm Goyard with impunity. (Thierry Decl. ¶¶ 16-18.) See also Bose Corp., 334 F.R.D. at 517 ("From the plaintiff's perspective . . . it is irrelevant whether the swarm is intentionally coordinated or simply a product of market forces enabled by the internet.")

Meaningful space on the Web is akin to real estate – there is only so much of it available. E-commerce operators, including Goyard and Defendants, spend significant resources incorporating concepts and popular search terms, such as the Goyard Marks, into their on-site and off-site content and advertising to promote visibility on the Web. A significant part of relevant market targeting involves reaching a specific demographic or profile based upon a user's search terms. (See Thierry Decl. ¶¶ 15-16.) Goyard is doing so through the use of its trademarks in which it has made a substantial economic investment, and Defendants are doing so through subterfuge and unlawful use of the Goyard Marks. Each Defendant is helping to create and maintain the overall illicit marketplace where they market and sell their respective goods and confuse consumers.

Goyard, its trademark rights, and associated goodwill are suffering death by 1,000 cuts caused by the combined force of all of Defendants' individual but concurrent unlawful activities. The combined force and effect of all Defendants' actions are causing the single indivisible harm of the mass consumer confusion and the denial of Goyard's right to fairly compete for visibility on the Web.

### **III. ARGUMENT**

#### **A. A Temporary Restraining Order is Essential to Prevent Immediate Injury.**

Rule 65(b) of the Federal Rules of Civil Procedure provides, in part, that a temporary restraining order may be granted without written or oral notice to the opposing party or that party's counsel where "specific facts in an affidavit . . . clearly show that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition." FED. R. CIV. P. 65(b). This is such a case.

Defendants fraudulently promote, advertise, offer to sell, and sell goods bearing and/or using counterfeits and infringements of the Goyard Marks via their e-commerce stores using the E-commerce Store Names. By their actions, Defendants are creating a false association in the minds of consumers between Defendants and Goyard. Specifically, Defendants are wrongfully using counterfeits and infringements of the Goyard Marks to increase consumer traffic to their illegal operations. The entry of a temporary restraining order will serve to immediately stop Defendants from benefiting from their wrongful use of the Goyard Marks and will preserve the status quo until such time as a hearing can be held. See Dell Inc. v. BelgiumDomains, LLC, Case No. 07-22674, 2007 WL 6862341, at \*2 (S.D. Fla. Nov. 21, 2007) (finding *ex parte* relief more compelling where Defendants' scheme "is in electronic form and subject to quick, easy, untraceable destruction by Defendants").

Absent a temporary restraining order without notice, Defendants can and, based upon Goyard's counsel's experience, will likely significantly alter the status quo before the Court can determine the parties' respective rights. In particular, the Internet based e-commerce stores at issue are under Defendants' complete control. Thus, Defendants can change the ownership or modify e-commerce store and private messaging account data and content, change payment accounts, redirect consumer traffic to other e-commerce store names and private messaging accounts, and transfer assets and ownership of the E-commerce Store Names. (See Wiborg-Rodriguez Decl. ¶ 4.) Such modifications can happen in a short span of time after Defendants are provided with notice of this action. (Id.) Thus, Defendants can easily electronically transfer and secret the funds sought to be restrained if they obtain advance notice of Plaintiff's Application for Temporary Restraining Order and thereby thwart the Court's ability to grant meaningful relief and can completely erase the status quo. (Id.) As Defendants engage in unlawful counterfeiting, Goyard has no reason to believe they will make their assets available for recovery pursuant to an accounting of profits or will adhere to the authority of this Court any more than they have adhered to federal trademark law. (Id.)

Moreover, federal courts have long recognized that civil actions against counterfeiters – whose very businesses are built around the deliberate misappropriation of rights and property belonging to others – present special challenges that justify proceeding on an *ex parte* basis. Columbia Pictures Indus., Inc. v. Jasso, 927 F. Supp. 1075, 1077 (N.D. Ill. 1996) (observing that "proceedings against those who deliberately traffic in infringing merchandise are often useless if notice is given to the infringers"). This Court should prevent an injustice from occurring by issuing



an *ex parte* temporary restraining order that precludes Defendants from continuing to display their infringing content or modifying or deleting any related content or data. Only such an Order will prevent ongoing irreparable harm and maintain the status quo.

**B. Standard for Temporary Restraining Order and Preliminary Injunction.**

In this Circuit, the standard for obtaining a temporary restraining order and the standard for obtaining a preliminary injunction are the same. See Emerging Vision, Inc. v. Glachman, Case No. 10-cv-80734, 2010 WL 3293346, at \*3 (S.D. Fla. June 29, 2010) (citing Siegel v. LePore, 120 F. Supp. 2d 1041 (S.D. Fla. 2000) aff'd 234 F.3d 1163 (11th Cir. 2000)). In order to obtain a temporary restraining order or a preliminary injunction, a party must establish (1) a substantial likelihood of success on the merits; (2) that irreparable injury will be suffered if the relief is not granted; (3) that the threatened injury outweighs the harm the relief would inflict on the non-movant; and (4) that entry of the relief would serve the public interest. Schiavo ex rel. Schindler v. Schiavo, 403 F.3d 1223, 1225-26 (11th Cir. 2005); see also Levi Strauss & Co. v. Sunrise Int'l Trading Inc., 51 F.3d 982, 985 (11th Cir. 1995) (affirming entry of preliminary injunction and freezing of assets). Goyard's evidence establishes all of the relevant factors.

**1. Probability of Success on the Merits of Goyard's Claims.**

**a) Likelihood of Success on Counterfeiting Claim.**

Title 15 U.S.C. § 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 in connection with the sale, offering for sale, distribution, or advertising of any goods or services on or in connection with which such use is likely to cause confusion, or to cause mistake, or to deceive." 15 U.S.C. § 1114 (2018). Goyard must demonstrate (1) ownership of the trademarks at issue; (2) Defendants' use of the trademarks is without Goyard's authorization; and (3) Defendants' use is likely to cause confusion, mistake, or deception as to the source, affiliation, or sponsorship of Defendants' Goods. See 15 U.S.C. § 1114(1). Goyard's evidence satisfies these requirements.

The first two elements of Goyard's trademark counterfeiting and infringement claims are easily met. The Goyard Marks are owned by Goyard and registered on the Principal Register of the United States Patent and Trademark Office, and some marks at issue herein have become

“incontestable” under 15 U.S.C. §§ 1058 and 1065.<sup>5</sup> (See Thierry Decl. ¶ 5; see also Goyard Trademark Registrations, attached as Comp. Ex. 1 to the Compl.) See Ocean Bio-Chem, Inc. v. Turner Network Television, Inc., 741 F. Supp. 1546, 1554 (S.D. Fla. 1990) (“Incontestable status provides conclusive evidence of the registrant’s exclusive right to use the registered mark, subject to §§ 15 and 33(b) of the Lanham Act.”). Moreover, Defendants have never had the right or authority to use the Goyard Marks. (Thierry Decl. ¶¶ 9, 12-13.)

The Eleventh Circuit uses a seven-factor test in determining the third element, likelihood of confusion. See Ross Bicycles, Inc. v. Cycles USA, Inc., 765 F.2d 1502, 1506 (11th Cir. 1985). These factors, as outlined in Safeway Store, Inc. v. Safeway Discount Drugs, Inc., are: (1) the strength of the mark; (2) the similarity of marks; (3) the similarity of the goods; (4) similarity of the sales methods; (5) the similarity of advertising media; (6) defendants’ intent; and (7) evidence of actual confusion. See 675 F.2d 1160, 1164 (11th Cir. 1982); see also Lipscher v. LRP Publ’ns, Inc., 266 F.3d 1305, 1303 (11th Cir. 1997). The seven factors listed are to be weighed and balanced and no single factor is dispositive. (Id.)

#### **(1) Strength of the Marks.**

A trademark’s strength is determined by viewing the mark in its entirety as it appears in the marketplace. See Lone Star Steakhouse and Saloon, Inc. v. Longhorn Steaks, Inc., 106 F.3d 355, 362 (11th Cir. 1997). The spectrum of protectability and strength for trademarks is divided into four primary types of designations: (1) coined, fanciful or arbitrary; (2) suggestive; (3) descriptive; and (4) generic. See Two Pesos, Inc. v. Taco Cabana, Inc., 505 U.S. 763, 768, 112 S. Ct. 2753, 120 L.Ed.2d 615 (1992). Arbitrary or fanciful marks are the strongest and deemed inherently distinctive and entitled to protection. (See id.) It cannot be seriously disputed that the Goyard Marks are strong, arbitrary and fanciful marks. (See Thierry Decl. ¶¶ 4-5; see also Goyard Trademark Registrations, attached as Comp. Ex. 1 to the Compl.)

The Goyard Marks have also acquired secondary meaning. Goyard expends substantial resources developing, advertising, and otherwise promoting the Goyard Marks. (Thierry Decl. ¶¶ 6-7.) The Goyard Marks enjoy widespread recognition and are prominent in the minds of consumers. Indeed, products bearing the Goyard Marks are among the most widely recognized trademarks in the United States. (Id.)

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<sup>5</sup> Trademark Registrations 5,532,309, 5,742,053, 5,753,841, 6,641,574, and 7,008,371 are not incontestable.

**(2) Similarity of the Marks.**

Likelihood of confusion is greater when an infringer uses the exact trademark. Turner Greenberg Assocs. v. C & C Imps., 320 F. Supp. 2d 1317, 1332 (S.D. Fla. 2004). Defendants are using marks that are identical to the Goyard Marks. (Compare Goyard's Trademark Registrations [Comp. Ex. 1 to the Compl.] with Defendants' infringing marks [E-commerce Store Names, attached as Comp. Ex. 1 to the Burns Decl.].)

**(3) Similarity of the Goods.**

"The greater the similarity between the products and services, the greater the likelihood of confusion." John H. Harland Co. v. Clarke Checks, Inc., 711 F.2d 966, 976 (11th Cir. 1983). Defendants are selling the same types of goods Goyard sells. (Thierry Decl. ¶¶ 4-5; see generally Defendants' E-commerce Store Names, attached as Comp. Ex. 1 to the Burns Decl.) Because they bear counterfeits of the Goyard Marks, Defendants' Goods appear virtually identical to Goyard's genuine products in the consumer market. Standing alone, this similarity can be held sufficient to establish a likelihood of confusion. See John H. Harland Co., 711 F.2d at 976.

**(4) Similarity of Sales Method and (5) Advertising Method.**

Convergent marketing channels increase the likelihood of confusion. See Turner Greenberg Assocs., 320 F. Supp. 2d at 1332. Both Goyard and Defendants sell and advertise their products using at least one of the same marketing channels, the Internet, in the same geographical distribution areas within the United States, including the Southern District of Florida. (See Thierry Decl. ¶ 5; Burns Decl. ¶ 4.) Thus, the conditions of purchase for both parties are unmistakably identical. Moreover, both target the same general U.S. consumers, and as such, Goyard is directly competing with Defendants' products.

**(6) Defendants' Intent.**

This district has held that when an alleged infringer adopts a mark "with the intent of obtaining benefit from the plaintiff's business reputation, 'this fact alone may be sufficient to justify the inference that there is confusing similarity.'" Turner Greenberg Assocs., 320 F. Supp. 2d at 1333 (citing Carnival Corp. v. Seaescape Casino Cruises, Inc., 74 F. Supp. 2d 1261, 1268 (S.D. Fla. 1999)). In a case of clear-cut copying such as that by the Defendants herein, it is appropriate to infer Defendants intended to benefit from Goyard's reputation to Goyard's detriment. See Playboy Ent., Inc. v. P.K. Sorren Export Co. Inc. of Fla., 546 F. Supp. 987, 996 (S.D. Fla. 1982).

### **(7) Evidence of Actual Confusion.**

Actual confusion is unnecessary to establish infringement since the test is likelihood of confusion. See Frehling Enters. v. Int'l Select Group, Inc., 192 F.3d 1330, 1340 (11th Cir. 1999). In this case, however, it is reasonable to infer actual confusion exists in the marketplace based upon the circumstantial evidence available. Defendants are advertising, offering to sell and selling counterfeit goods identical in appearance to those sold by Goyard. (Thierry Decl. ¶¶ 4-5, 9-13; Burns Decl. ¶ 4 and Comp. Ex. 1 thereto.) Even if buyers are told of the bogus nature of Defendants' Goods, other consumers viewing Defendants' Goods in a post-sale setting will obviously be confused, because they are viewing goods bearing the Goyard Marks, which undeniably creates the impression they are viewing genuine goods sold or authorized by Goyard. Such post-sale confusion is entirely actionable. See Remcraft Lighting Products, Inc. v. Maxim Lighting, Inc., 706 F. Supp. 855, 859 (S.D. Fla. 1989) ("The likelihood of confusion need not occur at wholesale level when the end user will be confused.").

The seven factors weigh only in Goyard's favor. Goyard has therefore shown a probability of success on the merits of its trademark counterfeiting and infringement claim.

### **b) Likelihood of Success on Cybersquatting Claim.**

The Anticybersquatting 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 which is identical or confusingly similar to, or dilutive of, the trademark owner's mark without regard to the goods or services of the parties. 15 U.S.C. § 1125(d). To prevail under 15 U.S.C. § 1125(d), Goyard must prove that (1) the Goyard Marks are distinctive or famous and entitled to protection; (2) Defendants' domain names are identical or confusingly similar to the Goyard Marks; and (3) Defendants registered or used the domain names with a bad faith intent to profit. Bavaro Palace, S.A. v. Vacation Tours, Inc., 203 Fed. Appx. 252, 256, 2006 WL 2847233, at \*3 (11th Cir. 2006). The evidence submitted herewith satisfies the requirements of 15 U.S.C. § 1125(d).

Defendant Numbers 1-2 (the "Cybersquatting Defendants") have registered their respective e-commerce store names, which incorporate, at least, one of the Goyard Marks in its entirety surrounded by descriptive or generic terms, rendering the name nearly identical as compared to the Goyard Marks (the "Cybersquatted E-commerce Store Names.")<sup>6</sup> See Victoria's

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<sup>6</sup> See Compl. ¶¶ 33, 67 [DE 1].

Cyber Secret Ltd. P'ship v. V Secret Catalogue, Inc., 161 F. Supp. 2d 1339, 1351 (S.D. Fla. 2001) (“The taking of an identical copy of another’s famous and distinctive trademark for use as a domain name creates a presumption of confusion among Internet users as a matter of law.”). Moreover, Courts have found that even slight differences between a domain name and a registered mark, such as the addition of minor or generic words to the disputed domain name, is irrelevant. See Ford Motor Co. v. Greatdomains.com, Inc., 177 F. Supp. 2d 635, 642 (E.D. Mich. 2001) (holding “unless words or letters added to the plaintiff’s mark within the domain name clearly distinguish it from the plaintiff’s usage, allegations that a domain name incorporates a protected mark generally will suffice.”).

The ACPA lists nine nonexclusive factors for courts to consider in determining whether a domain name has been registered or used in “bad faith” with an intent to profit from a mark in registering or using the mark in a domain name. See 15 U.S.C. § 1125(d)(1)(B)(i); see also Victoria’s Cyber Secret Ltd. P’ship, 161 F. Supp. 2d at 1346. The nine factors are not meant to be exclusive and the Court may consider all relevant factors in making a determination of bad faith. Id. at 1347. Ultimately, each factor addresses whether “the defendant’s use of the disputed domain name is legitimate – i.e., for some purpose other than simply to profit from the value of the trademark.” Ford Motor Co., 177 F. Supp. 2d at 642. An examination of the bad faith factors compels the conclusion that Defendant Numbers 1-2 registration and use of the Cybersquatted E-commerce Store Names violates 15 U.S.C. § 1125(d).

The first and third factors, § 1125(d)(1)(B)(I) and (III), are clearly present inasmuch as the Cybersquatting Defendants have no rights in the Goyard Marks and those Defendants have never used those Marks in connection with a bona fide offering of goods or services. Additionally, the fourth, fifth, and ninth factors, § 1125(d)(1)(B)(IV), (V), (IX), weigh in Goyard’s favor. As discussed above, the Cybersquatting Defendants have clearly intentionally incorporated the Goyard Marks in their Cybersquatted E-commerce Store Names to divert consumers looking for Goyard’s Internet website to their own Internet e-commerce store for commercial gain. Such consumers are likely to be confused as to the source and sponsorship of Cybersquatting Defendants’ Internet e-commerce stores and mistakenly believe their e-commerce stores are endorsed by and/or affiliated with Goyard. This is especially true in light of the fact that the e-commerce stores are offering for sale counterfeit Goyard branded goods. Clearly, the Cybersquatting Defendants’ registration of their Cybersquatted E-commerce Store Names in order

to sell and offer for sale counterfeit and infringing Goyard branded goods, knowing the name is identical or confusingly similar to Goyard's indisputably famous and distinctive marks, ensures a likelihood of confusion among consumers. See House Judiciary Committee Report on H.R. 3028, H.R. Rep. No. 106-412 p. 13 (October 25, 1999) ("The more distinctive or famous a mark has become, the more likely the owner of that mark is deserving of the relief available under this act."). Thus, Goyard has shown a likelihood of success on the merits of its cybersquatting claim.

**c) Likelihood of Success on False Designation of Origin, Common Law Unfair Competition, and Common Law Trademark Infringement Claims.**

As with a trademark infringement claim, the test for liability for false designation of origin under Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), is also whether the public is likely to be deceived or confused by the similarity of the marks at issue. Two Pesos, 505 U.S. at 780. Additionally, whether a defendant's use of a plaintiff's trademarks creates 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 and Florida common law trademark infringement. See Planetary Motion, Inc. v. Techsplosion, Inc., 261 F.3d 1188, 1193 n.4 (11th Cir. 2001) ("Courts may use an analysis of federal infringement claims as a 'measuring stick' in evaluating the merits of state law claims."); PetMed Express, Inc. v. MedPets.com, Inc., 336 F. Supp. 2d 1213, 1217-18 (S.D. Fla. 2004). Whether the violation is called infringement, unfair competition, or false designation of origin, the test is identical – is there a "likelihood of confusion?" Two Pesos, 505 U.S. at 780. Thus, because Goyard has established the merits of its trademark counterfeiting and infringement claims, a likelihood of success is also shown as to Goyard's claim for false designation of origin, as well as its common law unfair competition and trademark infringement claims.

**2. Goyard is Suffering Irreparable Injury.**

As the Eleventh Circuit expressed it: "[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." Ferrellgas Ptnrs., L.P. v. Barrow, 143 Fed. Appx., 180, 191 (11th Cir. 2005) (citing McDonald's Corp. v. Robertson, 147 F.3d 1301, 1310 (11th Cir. 1998)). Such a finding of irreparable injury following a showing of likelihood of confusion is virtually always made in a case such as this, where a plaintiff has demonstrated it will lose control of its reputation as a result of a defendant's activities. Id. A likelihood of confusion exists herein

because Defendants have engaged in counterfeiting activities using spurious designations indistinguishable from the Goyard Marks.

**3. The Balance of Hardship Tips Sharply in Goyard’s Favor.**

Goyard expends substantial resources to develop the quality, reputation, and goodwill associated with the Goyard Marks. (Thierry Decl. ¶¶ 6-8.) Should Defendants be permitted to continue their trade in counterfeit goods, Goyard will suffer losses and damage to its reputation. (See id. ¶¶ 8, 20.) However, Defendants will suffer no legitimate hardship in the event a temporary restraining order is issued, because Defendants have no right to engage in their present counterfeiting and infringing activities.

**4. The Relief Sought Serves the Public Interest.**

Defendants are engaged in unlawful activities and are directly defrauding consumers by palming off Defendants’ Goods as Goyard’s genuine goods. The public has an interest in not being misled as to the origin, source, or sponsorship of trademarked products. See Nailtiques Cosmetic Corp. v. Salon Sciences, Corp., 1997 WL 244746, 5, 41 U.S.P.Q.2d 1995, 1999 (S.D. Fla. 1997) (“The interests of the public in not being victimized and misled are important considerations in determining the propriety of granting injunctive relief.”).

**C. The Equitable Relief Sought is Appropriate.**

The Lanham Act authorizes courts to issue injunctive relief “according to principles of equity and upon such terms as the court may deem reasonable, to prevent the violation of any right of the registrant of a mark ....” 15 U.S.C. § 1116(a).

**1. Entry of an Order Immediately Enjoining Defendants’ Unauthorized and Unlawful Use of Goyard’s Trademarks is Appropriate.**

Goyard requests an order requiring Defendants to immediately cease all use of the Goyard Marks, or substantially similar marks, including on or in connection with all e-commerce stores they own and operate, or control. Such relief is necessary to stop the ongoing harm to Goyard’s trademarks and goodwill and to prevent Defendants from continuing to benefit from the increased consumer traffic to their unlawful operations created by their unlawful use of the Goyard Marks. Many courts, including this Court, have authorized immediate injunctive relief in similar cases involving the unauthorized use of trademarks.<sup>7</sup>

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<sup>7</sup> See Chanel, Inc. v. Individuals, No. 24-cv-22336-BLOOM/Elfenbein, 2024 U.S. Dist. LEXIS 158234 (S.D. Fla. June 24, 2024) (Order Granting *Ex Parte* Application for Entry of Temporary

## **2. An *Ex Parte* Order Restraining Transfer of Assets is Appropriate.**

In addition to an order temporarily restraining Defendants' practices, the Court should further enter an order limiting the transfer of Defendants' unlawfully gained assets. Goyard has demonstrated above that it will likely succeed on the merits of its claims. As such, under 15 U.S.C. § 1117, Goyard will be entitled to an accounting and payment of the profits earned by Defendants throughout the course of their counterfeiting scheme. 15 U.S.C. § 1117(a) (2022). Due to the deceptive nature of the counterfeiting business, and Defendants' deliberate violations of federal trademark laws, Goyard respectfully requests this Court grant additional *ex parte* relief identifying payment accounts and restraining the transfer of all monies held or received by PayPal, or other financial institutions, for the benefit of any one or more of the Defendants. (See Wiborg-Rodriguez Decl. ¶¶ 5-9.) See Int'l Star Class Yacht Racing Ass'n v. Tommy Hilfiger USA, Inc., 80 F.3d 749 (2d Cir. 1996); see also SEC v. ETS Payphones, 408 F.3d 727, 735 (11th Cir. 2005) (finding it proper to all of the defendant's assets, because it was necessary to preserve sufficient funds for the potential disgorgement in the case).

This Court has broad authority to grant such an order. The Supreme Court has provided that district courts have the power to grant preliminary injunctions to prevent a defendant from transferring assets in cases where an equitable interest is claimed. Grupo Mexicano de Desarrollo, S.A. v. Alliance Bond Fund, Inc., 527 U.S. 308, 144 L. Ed. 2d 319, 119 S. Ct. 1961 (1999). Moreover, almost every Circuit has interpreted Rule 65 of the Federal Rules of Civil Procedure to grant authority to courts to restrain assets *pendente lite*. See Mason Tenders Dist. Council Pension

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Restraining Order); adidas AG v. Individuals, Bus. Entities, & Unincorporated Ass'ns Identified on Schedule "A", No. 23-62188-CIV-BLOOM, 2023 U.S. Dist. LEXIS 214777 (S.D. Fla. Nov. 22, 2023) (same); Richemont Int'l SA v. Individuals, Bus. Entities & Unincorporated Ass'ns, No. 22-cv-61064-Bloom, 2022 U.S. Dist. Lexis 104707 (S.D. Fla. June 8, 2022) (same); Yeti Coolers, LLC v. Individuals, Business Entities & Unincorporated Ass'ns, No. 21-cv-62008-Bloom, 2021 U.S. Dist. LEXIS 197592 (S.D. Fla. Sept. 28, 2021) (same); Chanel, Inc. v. 7areplica, No. 19-cv-61532-BLOOM, 2019 U.S. Dist. LEXIS 233157 (S.D. Fla. June 24, 2019) (same). See also Tiffany NJ LLC v. Individuals, No. 24-61195-CIV-MARTINEZ-VALLE, 2024 U.S. Dist. LEXIS 157325 (S.D. Fla. July 16, 2024) (same); Apple Corps Ltd. v. Individuals, Bus. Entities & Unincorporated Ass'ns, No. 24-60990-CIV-SMITH, 2024 U.S. Dist. LEXIS 133584 (S.D. Fla. June 27, 2024) (same); Richemont Int'l SA v. Individuals, No. 23-CV-62422-SMITH, 2024 U.S. Dist. LEXIS 88970 (S.D. Fla. Mar. 25, 2024) (same); Chanel, Inc. v. Individuals, No. 1:24-cv-20079-GAYLES/LOUIS, 2024 U.S. Dist. LEXIS 88930 (S.D. Fla. Mar. 5, 2024) (same); Chanel, Inc. v. Individuals, Bus. Entities, & Unincorporated Ass'ns Identified on Schedule "A", No. 23-62372-CIV, 2024 U.S. Dist. LEXIS 51749 (S.D. Fla. Jan. 31, 2024) (same).



Fund v. Messera, 1997 WL 223077 (S.D.N.Y. May 7, 1997) (acknowledging that “[a]lmost all the Circuit Courts have held that Rule 65 is available to freeze assets *pendente lite* under some set of circumstances”).

In light of the illicit nature of the counterfeiting business and the ability of counterfeiters to practically eliminate their evidentiary trails by conducting their business entirely over the Internet, courts in the Eleventh Circuit, among others, have particularly noted the significance of such asset restraints in cases involving counterfeiting defendants. See, e.g. Levi Strauss & Co. v. Sunrise Int’l Trading, 51 F.3d 982 (11th Cir. 1995); Reebok Int’l Ltd. v. Marnatech Enter., 737 F. Supp. 1521 (S.D. Cal. 1989), aff’d, 970 F.2d 552 (9th Cir. 1992). In Levi Strauss, the Eleventh Circuit upheld an order granting an asset restraint against an alleged counterfeiter where the complaint included a request for a permanent injunction and the equitable remedy of disgorgement of the alleged counterfeiter’s profits under 15 U.S.C. § 1117. Levi Strauss, 51 F.3d at 987. Distinguishing Levi Strauss from two earlier cases not involving Lanham Act claims, the Court emphasized the necessity of the restraint holding that a “request for equitable relief invokes the district court’s inherent equitable powers to order preliminary relief, including an asset freeze, in order to assure the availability of permanent relief.” Id. citing Federal Trade Commission v. United States Oil and Gas Corp., 748 F.2d 1431, 1433-34 (11th Cir. 1984) (district court may exercise its full range of equitable powers, including a preliminary asset restraint, to ensure that permanent equitable relief will be possible). Indeed, courts may issue broad asset restraints to preserve the availability of permanent relief, including assets that are not directly traceable to the fraudulent activity that serves as a basis for the equitable relief requested. See S. E. C. v. Lauer, 445 F. Supp. 2d 1362, 1370 (S.D. Fla. 2006) (noting that there is no requirement for the restrained assets be traceable to the fraudulent activity underlying a lawsuit); Levi Strauss & Co., 51 F.3d at 987-88 (upholding asset restraint, including assets not linked to the profits of the alleged illegal activity, noting the defendants may request the court exempt any particular assets); Kemp v. Peterson, 940 F.2d 110, 113-14 (4th Cir. 1991) (district court may restrain assets not specifically traced to illegal activity). In substantially similar cases, this Court and others have entered the precise relief sought herein.<sup>8</sup>

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<sup>8</sup> See e.g., Chanel, Inc. v. Individuals, No. 24-cv-22336-BLOOM/Elfenbein, 2024 U.S. Dist. LEXIS 158234 (S.D. Fla. June 24, 2024) (Order granting TRO, *inter alia*, restraining funds held or received by financial institution to preserve assets to satisfy Plaintiff’s requested relief); adidas

Similarly, in Reebok v. Marnatech, the District Court granted Reebok a limited restraint of the defendants' assets for the purpose of preserving those assets, thus ensuring the availability of a meaningful accounting after trial. Reebok Int'l Ltd., 737 F. Supp. at 1526. In affirming the decision, the Ninth Circuit determined that the plaintiff met its burden of demonstrating: (1) a likelihood of success on the merits; (2) immediate and irreparable harm because of defendants' counterfeiting activities; and (3) that defendants might hide their allegedly ill-gotten profits if their assets were not frozen. Reebok Int'l Ltd., 970 F.2d 552, 563 (9th Cir. 1992). Moreover the Court reasoned: "because the Lanham Act authorizes the District Court to grant Reebok an accounting of [defendant's] profits as a form of final equitable relief, the District Court has the inherent power to freeze [defendant's] assets in order to ensure the availability of that final relief." Reebok Int'l Ltd., 970 F.2d. at 559; see also Republic of Philippines v. Marcos, 862 F.2d 1355, 1364 (9th Cir. 1988), cert. denied, 490 U.S. 1035 (1989) ("[a] court has the power to issue a preliminary injunction in order to prevent a defendant from dissipating assets in order to preserve the possibility of equitable remedies").

Using the power to issue provisional remedies ancillary to their authority to provide final equitable relief, numerous courts have granted orders restraining defendants from transferring their assets under trademark infringement claims. See e.g., Levi Strauss, 51 F.3d at 987; Reebok Int'l Ltd., 970 F.2d at 559. Moreover, to provide complete equitable relief, courts have granted such orders without providing notice to the defendants. Specifically, federal courts have held that where advance notice of an asset restraint is likely to cause a party to alienate the assets sought to be

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AG v. Individuals, Bus. Entities, & Unincorporated Ass'ns Identified on Schedule "A", No. 23-62188-CIV-BLOOM, 2023 U.S. Dist. LEXIS 214777 (S.D. Fla. Nov. 22, 2023) (same); Richemont Int'l SA v. Individuals, Bus. Entities & Unincorporated Ass'ns, No. 22-cv-61064-Bloom, 2022 U.S. Dist. Lexis 104707 (S.D. Fla. June 8, 2022) (same); Yeti Coolers, LLC v. Individuals, Business Entities & Unincorporated Ass'ns, No. 21-cv-62008-Bloom, 2021 U.S. Dist. Lexis 197592 (S.D. Fla. Sept. 28, 2021) (same); Mycoskie, LLC v. Individuals, No. 19-cv-60518-BLOOM/Valle, 2019 U.S. Dist. LEXIS 79803 (S.D. Fla. Mar. 1, 2019) (same). See also Tiffany NJ LLC v. Individuals, No. 24-61195-CIV-MARTINEZ-VALLE, 2024 U.S. Dist. LEXIS 157325 (S.D. Fla. July 16, 2024) (same); Apple Corps Ltd. v. Individuals, Bus. Entities & Unincorporated Ass'ns, No. 24-60990-CIV-SMITH, 2024 U.S. Dist. LEXIS 133584 (S.D. Fla. June 27, 2024) (same); Richemont Int'l SA v. Individuals, No. 23-CV-62422-SMITH, 2024 U.S. Dist. LEXIS 88970 (S.D. Fla. Mar. 25, 2024) (same); Chanel, Inc. v. Individuals, No. 1:24-cv-20079-GAYLES/LOUIS, 2024 U.S. Dist. LEXIS 88930 (S.D. Fla. Mar. 5, 2024) (same); Chanel, Inc. v. Individuals, Bus. Entities, & Unincorporated Ass'ns Identified on Schedule "A", No. 23-62372-CIV, 2024 U.S. Dist. LEXIS 51749 (S.D. Fla. Jan. 31, 2024) (same).

restrained, a temporary restraining order may be issued *ex parte*. See F.T. Int'l Ltd v. Mason, 2000 WL 1514881 \*3 (E.D. Pa. 2000) (granting *ex parte* TRO restraining defendants' bank accounts upon finding that advance notice would likely have caused the defendants to secret or alienate funds); CSC Holdings, Inc. v. Greenleaf Elec., Inc., 2000 WL 715601 (N.D. Ill. 2000) (granting *ex parte* TRO enjoining cable television pirates and restraining pirates' assets).

Defendants' blatant violations of federal trademark laws warrant an *ex parte* order restraining the transfer of their assets. Moreover, as Defendants' businesses are conducted anonymously over the Internet, Goyard has additional cause for *ex parte* relief, as Defendants may easily secret or transfer their assets without the Court's or Goyard's knowledge.

**D. An Appropriate Bond Should Secure the Injunction.**

The posting of security upon issuance of an injunction is vested in the Court's sound discretion. Fed. R. Civ. P. 65(c). Because of the strong and unequivocal nature of Goyard's evidence of counterfeiting and infringement, Goyard respectfully requests this Court require it to post a bond of no more than ten thousand dollars (\$10,000.00), subject to increase at the Court's discretion should an application be made in the interest of justice.

**IV. CONCLUSION**

In view of the foregoing, Plaintiff, Goyard St-Honore, respectfully requests this Court grant its *Ex Parte* Application and enter a temporary restraining order as to Defendants in the form submitted herewith and schedule a hearing on Plaintiff's Motion for a Preliminary Injunction before the expiration of the temporary restraining order. Additionally, due to the time provisions of a temporary restraining order, in the event the application is granted, Goyard respectfully requests the Court provide a copy of the Court's Order to Goyard's counsel via e-mail at [annie@smgpa.cloud](mailto:annie@smgpa.cloud) so that Goyard may immediately effectuate any relief ordered therein and provide Defendants proper notice of the order and any subsequent hearing date.

DATED: September 25, 2024.

Respectfully submitted,  
STEPHEN M. GAFFIGAN, P.A.

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E-mail: [Annie@smgpa.cloud](mailto:Annie@smgpa.cloud)

Attorneys for Plaintiff, GOYARD ST-HONORE

**SCHEDULE “A”**  
**DEFENDANTS BY NUMBER, E-COMMERCE STORE NAME, FINANCIAL**  
**ACCOUNT INFORMATION, E-MAIL ADDRESS,**  
**AND OTHER MEANS OF CONTACT**

Def. No.	Defendant/ E-commerce Store Name	Payee	Merchant ID	Financial Account	E-mail Addresses	Other Means of Contact
1	goyardbagus.com		G76ZM2HEH7VAG		admin@goyardbagus.com	
2	goyarduksale.com	EDDIE GRIGGS @EGRIGGS 408	3V9T945J55BL4		luxuryitemswholesale@gmail.com	
3	aaareplica.nu	齐齐哈尔市变晓商贸有限公司	7Y4W2X69U8JK8	maoxiaohupp@outlook.com	service@aaareplica.nu service@aaareplica.nu	
4	bagscoll.shop	Luybagq	J4F24FFE2DGV6		support@zngogo.com	
4	blissbags.shop	LUXURYBAGSALEssc	A8Y8GSFRHE72J		Support@zngogo.com <a href="mailto:help@luybagsonline.shop">help@luybagsonline.shop</a>	
4	luxesbag.shop	LUXBAGONLINE Luybagq	MLLCUQ5WLJB2N CPMHBE54LTRD6		Support@zngogo.com	
4	topbagsnew.shop	LUXURYBAGSALEs LUXURYBAGSALEssd	H8WS8VQZYWJEW 5NQJRJ4QRZVYN		Support@zngogo.com 547602388@qq.com Support@zngogo.com <a href="mailto:help@luybagsonline.shop">help@luybagsonline.shop</a>	
5	buyqualitybags.com		2444YDDM2597J	79886689@qq.com	topbagshub@gmail.com contact@topqualitybags.com	
		Tabren Aubrey Smith	RQLTT8ZY2YWL6	keithgrainger90@outlook.com		
5	topqualitybags.com		KV5T4GV3KAKZJ	Usamamanzoortstripe@gmail.com	topbagshub@gmail.com	

					contact@topqualitybags.com	
6	byaneity.com	Byaneity	GNJEDFUTP XESS		service@unigav e.com service@byaneit y.com	
7	casebig.com		TFSNLFL6A NVF6		favocase@gmail .com sales@Casebig. com	
8	casefeely.com	CASEFEEL Y	Y4HM7FMW 95PWW		support@casefe ely.com	
9	caseshunter.com		VAYBUU357 F444		admin@caseshu nter.com	
10	cinderellastores.com	Rokki Agbotsu	2357NLWTJ3 8GJ		info@cinderella stores.com cinderellastoren z@gmail.com	
11	crozus.com		NJU2X7GLD 5X86 CMGUNSJL VGA6		support@crozus .com	
12	designermusthave.com	Designer Must Have	THGZG4A39 BKW4			designermusthave.c om/index.php/conta ct-us-2
13	qkkbag.shop	文 智弘 @41y8	KF29JLWXM CQWA		support@qkkba g.shop lagreen511@gm ail.com sales@qkkbag.s hop	
13	qnkbag.shop	文 智弘 @41y8	KF29JLWXM CQWA		support@qnkba g.shop lagreen511@gm ail.com sales@qnkbag.s hop	
13	whwlbag.shop	文 智弘 @41y8	KF29JLWXM CQWA		support@whwlb ag.shop cntopshoes@gm ail.com sales@whwlbag .shop	
13	wmtbag.shop	文 智弘 @41y8	KF29JLWXM CQWA		support@wmtba g.shop alexissaveryrpe	

					ws@gmail.com cntopshoes@gmail.com sales@wmtbag.shop	
13	wshubag.shop	文 智弘 @41y8	KF29JLWXM CQWA	asd763881227 @163.com	support@wshubag.shop worldsroderickt hyiqph@gmail.com sales@wshubag.shop	
13	xknbag.shop	文 智弘 @41y8	KF29JLWXM CQWA		support@xknbag.shop cntopshoes@gmail.com sales@xknbag.shop	
14	gorchic.com	Hefei Jiao Kun Trading Co., Ltd.	PT465C2FK4 F7S		service@gorchic.com	
14	gorchic.us	Hefei Jiao Kun Trading Co., Ltd.	PT465C2FK4 F7S		service@gorchic.com	
			ZU5WRREP DXNK4			
				lindashuai1995@gmail.com	service@gorchic.com service@gorchic.net	
15	high-endbags01.com		WHFLXXCT HQ2QY	cong_0617@qq.com	xxx@163.com	
16	jojokkrelicas.com	福根 伍	FZ3HYPANX XR5Q	wufugen1115@163.com	support@jojokkrelicas.net	
17	karanfrank.ru			2315162318@qq.com	karanfrankk@outlook.com	
18	luxeebag.com	LuxeeBag	CM4ECTF5E NA9Y		support@luxeebag.com	
19	luxuryoubag.com	FindingLuxury	8SG3KGHCT C9BG		contact@luxuryoubag.com	
20	mafoi.shop		ZQBVLPZ48 7SS4	segadiarra@gmail.com	customers@mafoi.shop clients@mafoi.shop	
21	merchprintz.com	MerchPrintz	DXS6FASUE QG2Q		support@merchprintz.com	

22	peesty.com		K9NVCKFEB T27W		sale@temafes.bi z support@temafe s.net	
22	temaap.com		K9NVCKFEB T27W		support@temaa p.com support@fasbag s.shop	
22	temafes.us		K9NVCKFEB T27W		sale@temafes.bi z support@temafe s.net	
23	racastudyo.com	Raca Studyo Pty Ltd	SFNPZT873B UCJ		hello@racastud yo.com	
24	tgey.top	Qiansheng TRADING Co.LTD	WE4RF8RW7 CUWG		Allison54321aa @outlook.com	
25	theluxhouse.net	Fashion Venue	LVN357P5CL TWC	davidruffinjr@ yahoo.com	info@theluxhou se.net theluxhouse1 @ gmail.com	
26	thetotetrove.myshopify.c om	LuxuryHub	V8A8PG45Z HLVQ		ameliaavaforyou @gmail.com store+79032254 753@t.shopifye mail.com avasophiaforyou @gmail.com	
27	vincyrep.ru	林海 柳		liulinhai188@o utlook.com	vincystore@hot mail.com admin@liomui.c om	
				rongfeng- 2022@outlook. com	vincystore@hot mail.com	
				huixiang- 2022@outlook. com	vincystore@hot mail.com	
28	viokshop.com		KF44JSYPRD 6SC	wuwupei@outl ook.com	besttopstores_se rvice@outlook.c om	
29	vittoriaparumbell.com	VittoriaParu mbell	3HZNUQB8Y TJY6		vittoriaparumbel l.com@gmail.co m	



					sales@vittoriaparrumbell.com	
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