

**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 MOTION FOR ENTRY OF DEFAULT FINAL JUDGMENT**

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 Motion for Entry of Default Final Judgment (the "Motion for Default Judgment") against Defendants, the Individuals, Business Entities, and Unincorporated Associations Identified on Schedule "A" to Plaintiff's Motion for Default Judgment ("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.

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

4. On September 25, 2024, Goyard filed its *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets (the “Application for Temporary Restraining Order”) [ECF No. 9]. I hereby incorporate by reference all factual allegations contained in my declaration filed in support of Goyard’s Application for Temporary Restraining Order [ECF No. 9-1].

5. With the assistance of Goyard’s counsel, a chart has been prepared for the convenience of the Court providing an example of the trademarks counterfeited and types of goods offered for sale and/or sold per Defendant, including citations to the evidence. As reflected in the chart, Goyard calculated the statutory damages awards by starting with a baseline of \$20,000.00, trebled to reflect Defendants’ willfulness, and doubled for the purpose of deterrence, resulting in \$120,000.00 per trademark counterfeited per type of good offered for sale and/or sold per Defendant. (See Exhibit “1” hereto.) Goyard then multiplied the \$120,000.00 baseline number by the number of Goyard Marks counterfeited and the number of different types of goods offered for sale and/or sold to Goyard’s investigator, as reflected in the evidence submitted for each Defendant as Composite Exhibit “1” to the Declaration of Kathleen Burns in Support of Goyard’s Application for Temporary Restraining Order, ECF Nos. [9-4 through 9-6], and Composite Exhibit “1” to the Declaration of Kathleen Burns in Support of Goyard’s Notice of Identification of Additional Financial Accounts, ECF No. [39-2]. Although Goyard’s evidence demonstrates that Defendants have counterfeited multiple trademarks on multiple types of goods, Goyard is basing its calculation of its statutory damages awards on the types of goods ordered by Goyard’s investigator.

6. Goyard’s damages request of \$120,000.00 per Goyard Mark counterfeited per type

of good offered for sale and/or sold against each Defendant, as calculated per Defendant in Exhibit “1” hereto, falls in line with meeting the statutory goals of providing partial compensation to Goyard and serving to deter Defendants and others in similar businesses from continuing to counterfeit Goyard’s trademarks.

7. Additionally, Plaintiff’s evidence demonstrates that Defendant Numbers 1-2 have registered a domain name that is identical to at least one of the Goyard Marks. As such, Plaintiff requests \$10,000.00 for each cybersquatted domain name.

I declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct. Executed: 2024-11-15 at Paris, France.

Jean-Laurent Thierry

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