

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

Case No. 24-cv-23663-BLOOM/Elfenbein

GOYARD ST-HONORE,

Plaintiff,

vs.

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

Defendants.

ORDER ON MOTION FOR ENTRY OF DEFAULT FINAL JUDGMENT

THIS CAUSE is before the Court upon Plaintiff, Goyard St-Honore’s (“Plaintiff”), Motion for Entry of Default Final Judgment Against Defendants, ECF No. [41] (“Motion”), filed on November 19, 2024. A Clerk’s Default was entered against Defendants on October 31, 2024, ECF No. [38], as Defendants failed to appear, answer, or otherwise plead to the Amended Complaint, ECF No. [20], despite having been served. *See* ECF No. [25]. The Court has carefully considered the Motion, the record in this case, the applicable law, and is otherwise fully advised. For the following reasons, Plaintiff’s Motion is granted.

II. INTRODUCTION

Plaintiff sued Defendants for trademark counterfeiting and infringement under § 32 of the Lanham Act, 15 U.S.C. § 1114; false designation of origin under § 43(a) of the Lanham Act, 15 U.S.C. § 1125(a); cybersquatting under § 43(d) of the Lanham Act; common-law unfair competition; and common-law trademark infringement. The Amended Complaint alleges that Defendants are promoting, advertising, distributing, offering for sale, and/or selling goods bearing

and/or using counterfeits and confusingly similar imitations of Plaintiff's registered trademarks within the Southern District of Florida through various Internet based e-commerce stores operating under their seller names identified on Schedule "A" attached to Plaintiff's Motion for Entry of Default Final Judgment (the "E-commerce Store Names"). *See* Motion, ECF No. [41] at 25-29.

Plaintiff further asserts that Defendants' unlawful activities have caused and will continue to cause irreparable injury to Plaintiff because Defendants have (1) deprived Plaintiff of its right to determine the manner in which its trademarks are presented to the public through merchandising; (2) defrauded the public into thinking Defendants' goods are goods authorized by Plaintiff; (3) deceived the public as to Plaintiff's association with Defendants' goods and the e-commerce stores that market and sell the goods; and (4) wrongfully traded and capitalized on Plaintiff's reputation and goodwill, as well as the commercial value of Plaintiff's trademarks.

In its Motion, Plaintiff seeks the entry of default final judgment against Defendants¹ in an action alleging trademark counterfeiting and infringement, false designation of origin, cybersquatting, common-law unfair competition, and common-law trademark infringement. Plaintiff further requests that the Court (1) enjoin Defendants from producing or selling goods that infringe its trademarks; (2) cancel, or at Plaintiff's election, transfer the E-commerce Store Names to Plaintiff; (3) assign all rights, title, and interest to the E-commerce Store Names to Plaintiffs and permanently disable, delist, or deindex the websites' uniform resource locators ("URLs") of the E-commerce Store Names from all internet search engines; (4) authorize Plaintiff to request any e-mail service provider permanently suspend the e-mail addresses which are or have been used by Defendants in connection with Defendants' promotion, offering for sale, and/or sale of goods bearing and/or using counterfeits and/or infringements of Plaintiff's trademarks; (5) require

¹ Defendants are the Individuals, Business Entities, and Unincorporated Associations identified on Schedule "A" of Plaintiff's Motion, and Schedule "A" of this Order. *See* Motion ECF No. [41] at 25-29.


Defendants to request in writing permanent termination of any messaging services, E-commerce Store Names, usernames, and social media accounts they own, operate, or control on any messaging service, e-commerce marketplace, or social media website; (6) require any administrators for the E-commerce Stores and any other alias e-commerce store names being used by Defendants to identify any e-mail address known to be associated with Defendants' respective E-commerce Store Names; and (7) award statutory damages.



Pursuant to Federal Rule of Civil Procedure 55(b)(2), the Court is authorized to enter a final judgment of default against a party who has failed to plead in response to a complaint. "[A] defendant's default does not in itself warrant the court entering a default judgment." *DirecTV, Inc. v. Huynh*, 318 F. Supp. 2d 1122, 1127 (M.D. Ala. 2004) (quoting *Nishimatsu Constr. Co., Ltd. v. Houston Nat'l Bank*, 515 F.2d 1200, 1206 (5th Cir. 1975)). Granting a motion for default judgment is within the trial court's discretion. *Nishimatsu*, 515 F.2d at 1206. Because the defendant is not held to admit facts that are not well pleaded or to admit conclusions of law, the court must first determine whether there is a sufficient basis in the pleading for the judgment to be entered. *See id.*; *see also Buchanan v. Bowman*, 820 F.2d 359, 361 (11th Cir. 1987) ("[L]iability is well-pled in the complaint and is therefore established by the entry of default . . ."). Upon a review of Plaintiff's submissions, it appears there is a sufficient basis in the pleading for the default judgment to be entered in favor of Plaintiff.

II. FACTUAL BACKGROUND²

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


² The factual background is taken from Plaintiff's Amended Complaint, ECF No. [20], Plaintiff's Motion for Entry of Default Final Judgment Against Defendants, ECF No. [41], and supporting evidentiary submissions.

Trademark	Registration Number	Registration Date	Class / Goods
	1,709,953	August 25, 1992	<p>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.</p> <p>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 cases, umbrellas, saddle covers, cloth carriers, articles for dogs; namely, dog collars, dog leashes, dog clothes and carrying bags.</p>
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>

Trademark	Registration Number	Registration Date	Class / Goods
 (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; 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,</p>

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Trademark	Registration Number	Registration Date	Class / Goods
			<p>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, 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>

Trademark	Registration Number	Registration Date	Class / Goods
			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.
	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> <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</p>

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Trademark	Registration Number	Registration Date	Class / Goods
			<p>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 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,</p>

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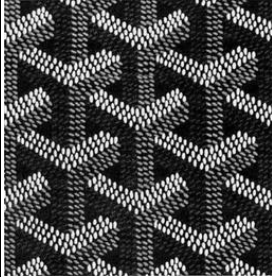
Trademark	Registration Number	Registration Date	Class / Goods
			<p>walking sticks, walking stick seats, collars for animals, animal leashes; clutch bags.</p> <p>IC 024 – Fabrics and textile products, namely, textile wall hangings, household linen, bed linen, table linen of textile, bath linen except clothing, handkerchiefs of textile, covers for cushions, unfitted fabric chair covers, traveling rugs, lap robes.</p> <p>IC 025 – 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>
	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;</p>

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Trademark	Registration Number	Registration Date	Class / Goods
			<p>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 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</p>


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Trademark	Registration Number	Registration Date	Class / Goods
			<p>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, 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>

Trademark	Registration Number	Registration Date	Class / Goods
	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, 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</p>

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Trademark	Registration Number	Registration Date	Class / Goods
			<p>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> <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</p>

Trademark	Registration Number	Registration Date	Class / Goods
			<p>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 trees, except illumination articles and confectionery; golf bags with or without wheels; bags and covers for tennis rackets; covers for petanque balls</p>
	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</p>

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Trademark	Registration Number	Registration Date	Class / Goods
			<p>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 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</p> <p>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</p>
GOYARD	7,008,371	March 28, 2023	IC 009 – Spectacles, sunglasses, spectacle cases, spectacle frames,

Trademark	Registration Number	Registration Date	Class / Goods
			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

See Decl. of Jean-Laurent Thierry (Thierry Decl.), ECF No. [9-1] ¶ 5; ECF No. [20-1] (containing Certificates of Registrations for the Goyard Marks at issue). The Goyard Marks are used in connection with the manufacture and distribution of high-quality goods in the categories identified above. *See* Thierry Decl., ECF No. [9-1] ¶¶ 4-5.

Defendants, by operating the Internet based e-commerce stores under the seller names (the “E-commerce Store Names”) identified on Schedule “A” have advertised, promoted, offered for sale, or sold goods bearing and/or using what Plaintiff has determined to be counterfeits, infringements, reproductions, and/or colorable imitations of the Goyard Marks. *See id.* ¶¶ 9-13; Decl. of T. Raquel Wiborg-Rodriguez (Wiborg-Rodriguez Decl.), ECF No. [9-2] ¶¶ 2-3; Decl. of Kathleen Burns (Burns Decl.), ECF No. [9-3] ¶ 4.

Although each Defendant may not copy and infringe each Goyard Mark for each category of goods protected, Plaintiff has submitted sufficient evidence showing each Defendant has infringed, at least, one or more of the Goyard Marks. *See* Thierry Decl., ECF No. [9-1] ¶¶ 9-13. Defendants are not now, nor have they ever been, authorized or licensed to use, reproduce, or make counterfeits, reproductions, or colorable imitations of the Goyard Marks. *See* Thierry Decl., ECF

No. [9-1] ¶¶ 9, 12-13.

Plaintiff's counsel retained Invisible Inc. a licensed private investigative firm, to investigate the promotion and sale of counterfeit and infringing versions of Plaintiff's products by Defendants and to document the available payment account data for receipt of funds paid to Defendants for the sale of counterfeit versions of Plaintiff's branded products. *See* Thierry Decl., ECF No. [9-1] ¶ 10; Wiborg-Rodriguez Decl., ECF No. [9-2] ¶ 2; Burns Decl., ECF No. [9-3] ¶ 3. Invisible Inc accessed the Internet based e-commerce stores operating under each of Defendants' E-commerce Store Names and placed orders from each Defendant for the purchase of various products, all bearing and/or using counterfeits of at least one of Plaintiff's trademarks at issue in this action and requested each product to be shipped to the Southern District of Florida. *See* Burns Decl., ECF No. [9-3] ¶ 4 and ECF Nos. [9-4 through 9-6]. Each order was processed entirely online and following the submission of the orders, Invisible Inc documented information³ for finalizing payment⁴ for the various products ordered on each of the Defendants' e-commerce stores as identified on Schedule "A".⁵ *See id.* At the conclusion of the process, the detailed web page captures and images of the various products bearing and/or using the Goyard Marks offered for sale and ordered via Defendants' E-commerce Store Names were sent to Plaintiff's representative for inspection. *See* Thierry Decl., ECF No. [9-1] ¶¶ 11-12; Wiborg-Rodriguez Decl., ECF No. [9-2] ¶ 2; Burns Decl., ECF No. [9-3] ¶ 4.

³ 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* Wiborg-Rodriguez Decl., ECF No. [9-2] ¶ 5; Burns Decl., ECF No. [9-3] ¶ 4 n.2.

⁴ Invisible Inc. did not transmit the funds to finalize the sale for the orders to avoid funding Defendants' coffers. *See* Wiborg-Rodriguez Decl., ECF No. [9-2] ¶ 2 n.1; Burns Decl., ECF No. [9-3] ¶ 4 n.3.

⁵ Some Defendants also provided contact e-mail addresses in connection with their E-commerce Store Names, which are included on Schedule "A." *See* Wiborg-Rodriguez Decl., ECF No. [9-2] ¶ 3; Burns Decl., ECF No. [9-3] ¶ 4 n.4.

Plaintiff's representative reviewed and visually inspected the detailed web page captures and images reflecting the products bearing and/or using the Goyard Marks offered for sale and ordered by Invisible Inc and determined the products were non-genuine, unauthorized versions of Plaintiff's goods. *See* Thierry Decl., ECF No. [9-1] ¶¶ 12-13.

Thereafter, Plaintiff discovered certain Defendants were continuing to accept payment for the sale of counterfeit versions of Plaintiff's branded products through their E-commerce Store Names via additional payment accounts. *See* Declaration of Kathleen Burns in Support of Plaintiff's Notice of Identification of Additional Financial Accounts (Burns Decl. in Support of Notice), ECF No. [39-1] ¶ 5 and Composite Exhibit 1 thereto, ECF No. [39-2]. Accordingly, Plaintiff filed a Notice of Identification of Additional Financial Accounts, *see* ECF No. [39].

III. DISCUSSION

A. Claims

1. Trademark Counterfeiting and Infringement Under 15 U.S.C. § 1114 (Count I)

Section 32 of the Lanham Act, 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: which is likely to cause confusion, or to cause mistake, or to deceive.” 15 U.S.C. § 1114. In order to prevail on its trademark infringement claim under Section 32 of the Lanham Act, Plaintiff must demonstrate that (1) it had prior rights to the mark at issue; and (2) Defendants adopted a mark or name that was the same, or confusingly similar to Plaintiff's trademark, such that consumers were likely to confuse the two. *Planetary Motion, Inc. v. Techsplosion, Inc.*, 261 F.3d 1188, 1193 (11th Cir. 2001) (citing *Lone Star Steakhouse & Saloon, Inc. v. Longhorn Steaks, Inc.*, 106 F.3d 355, 360 (11th Cir. 1997)).

2. False Designation of Origin Under 15 U.S.C. § 1125(a) (Count II)

To prevail on a claim for false designation of origin under Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), Plaintiff must prove that Defendants used in commerce, in connection with any goods or services, any word, term, name, symbol or device, or any combination thereof, or any false designation of origin that is likely to deceive as to the affiliation, connection, or association of Defendants with Plaintiff, or as to the origin, sponsorship, or approval, of Defendants' goods by Plaintiff. *See* 15 U.S.C. § 1125(a)(1). The test for liability for false designation of origin under 15 U.S.C. § 1125(a) is the same as for a trademark counterfeiting and infringement claim – i.e., whether the public is likely to be deceived or confused by the similarity of the marks at issue. *See Two Pesos, Inc. v. Taco Cabana, Inc.*, 505 U.S. 763, 780 (1992).

3. Cybersquatting Under 15 U.S.C. § 1125(d) (Count III)

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

4. Common Law Unfair Competition and Trademark Infringement (Counts IV and V)

Whether a defendant's use of a plaintiff's trademarks created a likelihood of confusion between the plaintiff's and the defendant's products is also the determining factor in the analysis

of unfair competition under Florida common law. *Rolex Watch U.S.A., Inc. v. Forrester*, No. 83- 8381-CIV-PAINE, 1986 WL 15668, at *3 (S.D. Fla. Dec. 9, 1986) (“The appropriate test for determining whether there is a likelihood of confusion, and thus trademark infringement, false designation of origin, and unfair competition under the common law of Florida, is set forth in *John H. Harland, Inc. v. Clarke Checks, Inc.*, 711 F.2d 966, 972 (11th Cir. 1983).”); *see also Boston Prof’l Hockey Ass’n, Inc. v. Dallas Cap & Emblem Mfg., Inc.*, 510 F.2d 1004, 1010 (5th Cir. 1975) (“As a general rule . . . the same facts which would support an action for trademark infringement would also support an action for unfair competition.”).

The analysis of liability for Florida common law trademark infringement is the same as the analysis of liability for trademark infringement under § 32(a) of the Lanham Act. *See PetMed Express, Inc. v. MedPets.com, Inc.*, 336 F. Supp. 2d 1213, 1217-18 (S.D. Fla. 2004).

B. Liability

The well-pled factual allegations of Plaintiff’s Amended Complaint properly allege the elements for each of the claims described above. *See* Amended Complaint ECF No. [20]. Moreover, the factual allegations in Plaintiff’s Amended Complaint have been substantiated by sworn declarations and other evidence and establish Defendants’ liability under each of the claims asserted in the Amended Complaint. Accordingly, default judgment pursuant to Federal Rule of Civil Procedure 55 is appropriate.

C. Injunctive Relief

Pursuant to the Lanham Act, a district court is authorized to issue an injunction “according to the principles of equity and upon such terms as the court may deem reasonable,” to prevent violations of trademark law. *See* 15 U.S.C. § 1116(a). Indeed, “[i]njunctive relief is the remedy of choice for trademark and unfair competition cases, since there is no adequate remedy at law for the injury caused by a defendant’s continuing infringement.” *Burger King Corp. v. Agad*, 911 F. Supp.

1499, 1509–10 (S.D. Fla. 1995) (citing *Century 21 Real Estate Corp. v. Sandlin*, 846 F.2d 1175, 1180 (9th Cir. 1988)). Moreover, even in a default judgment setting, injunctive relief is available. See e.g., *PetMed Express*, 336 F. Supp. 2d at 1222–23. Defendants’ failure to respond or otherwise appear in this action makes it difficult for Plaintiff to prevent further infringement absent an injunction. See *Jackson v. Sturkie*, 255 F. Supp. 2d 1096, 1103 (N.D. Cal. 2003) (“[D]efendant’s lack of participation in this litigation has given the court no assurance that defendant’s infringing activity will cease. Therefore, plaintiff is entitled to permanent injunctive relief.”)

Permanent injunctive relief is appropriate where a plaintiff demonstrates that (1) it has suffered irreparable injury; (2) there is no adequate remedy at law; (3) the balance of hardship favors an equitable remedy; and (4) an issuance of an injunction is in the public’s interest. *eBay, Inc. v. MercExchange, LLC*, 547 U.S. 388, 392–93 (2006). Plaintiff has carried its burden on each of the four factors. Accordingly, permanent injunctive relief is appropriate.

Specifically, in trademark cases, “a sufficiently strong showing of likelihood of confusion . . . may by itself constitute a showing of a substantial threat of irreparable harm.” *McDonald’s Corp. v. Robertson*, 147 F.3d 1301, 1306 (11th Cir. 1998); see also *Levi Strauss & Co. v. Sunrise Int’l Trading Inc.*, 51 F.3d 982, 986 (11th Cir. 1995) (“There is no doubt that the continued sale of thousands of pairs of counterfeit jeans would damage LS & Co.’s business reputation and might decrease its legitimate sales.”). Plaintiff’s Amended Complaint alleges that Defendants’ unlawful actions have caused Plaintiff irreparable injury and will continue to do so if Defendants are not permanently enjoined. See Amended Complaint, ECF No. [20]. Further, the Amended Complaint alleges, and the submissions by Plaintiff show, that the goods promoted, advertised, offered for sale, and/or sold by Defendants are nearly identical to Plaintiff’s genuine products and that consumers viewing Defendants’ counterfeit goods post-sale would actually confuse them for

Plaintiff's genuine products. *See id.* "Defendants' actions are likely to cause confusion of consumers at the time of initial interest, sale, and in the post-sale setting, who will believe all of Defendants' goods offered for sale in or through Defendants' e-commerce stores are genuine goods originating from, associated with, and/or approved by [Plaintiff]." *See* Amended Complaint, ECF No. [20] ¶ 25.

Plaintiff has no adequate remedy at law so long as Defendants continue to operate the E-commerce Store Names because Plaintiff cannot control the quality of what appears to be its products in the marketplace. An award of monetary damages alone will not cure the injury to Plaintiff's reputation and goodwill that will result if Defendants' infringing and counterfeiting actions are allowed to continue. Moreover, Plaintiff faces hardship from loss of sales and its inability to control its reputation in the marketplace. By contrast, Defendants face no hardship if they are prohibited from the infringement of Plaintiff's trademarks, which is an illegal act.

Finally, the public interest supports the issuance of a permanent injunction against Defendants to prevent consumers from being misled by Defendants' products. *See Chanel, Inc. v. besumart.com*, 240 F. Supp. 3d 1283, 1291 (S.D. Fla. 2016) ("[A]n injunction to enjoin infringing behavior serves the public interest in protecting consumers from such behavior."). The Court's broad equity powers allow it to fashion injunctive relief necessary to stop Defendants' infringing activities. *See, e.g., Swann v. Charlotte-Mecklenburg Bd. of Educ.*, 402 U.S. 1, 15 (1971) ("Once a right and a violation have been shown, the scope of a district court's equitable powers to remedy past wrongs is broad, for . . . [t]he essence of equity jurisdiction has been the power of the Chancellor to do equity and to mould each decree to the necessities of the particular case." (citation and internal quotation marks omitted)); *United States v. Bausch & Lomb Optical Co.*, 321 U.S. 707, 724 (1944) ("Equity

has power to eradicate the evils of a condemned scheme by prohibition of the use of admittedly valid parts of an invalid whole.”).

Defendants have created an Internet-based counterfeiting scheme in which they are profiting from their deliberate misappropriation of Plaintiff’s rights. Accordingly, the Court may fashion injunctive relief to eliminate the means by which Defendants are conducting their unlawful activities by canceling or transferring the E-commerce Store Names and all rights, title, and interest to the E-commerce Store Names to Plaintiff, instructing all search engines to permanently disable, delist, or de-index the websites’ uniform resource locators (“URLs”) and E-commerce Store Names, and permanently suspending the messaging applications, services, and/or accounts, including e-mail addresses which are or have been used by Defendants, such that these means may no longer be used as instrumentalities to further the sale of counterfeit goods.

D. Statutory Damages for the Use of Counterfeit Marks

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

The Court has wide discretion to determine the amount of statutory damages. *See PetMed Express*, 336 F. Supp. 2d at 1219 (citing *Cable/Home Commc’n Corp. v. Network Prod., Inc.*, 902 F.2d 829, 852 (11th Cir. 1990)). An award of statutory damages is appropriate despite a plaintiff’s inability to prove actual damages caused by a defendant’s infringement. *Under Armour, Inc. v.*

51nfljersey.com, No. 13-62809-CIV, 2014 WL 1652044, at *7 (S.D. Fla. Apr. 23, 2014) (quoting *Ford Motor Co. v. Cross*, 441 F. Supp. 2d 837, 852 (E.D. Mich. 2006) (“[A] successful plaintiff in a trademark infringement case is entitled to recover enhanced statutory damages even where its actual damages are nominal or non-existent.”)); *Playboy Enter., Inc. v. Universal Tel-A-Talk, Inc.*, No. CIV.A. 96-6961, 1998 WL 767440, at *8 (E.D. Pa. Nov. 3, 1998) (awarding statutory damages where plaintiff failed to prove actual damages or profits). Indeed, Congress enacted a statutory damages remedy in trademark counterfeiting cases because evidence of a defendant’s profits in such cases is almost impossible to ascertain. *See* S. REP. NO. 104-177, pt. V(7) (1995) (discussing purposes of Lanham Act statutory damages); *see also PetMed Express*, 336 F. Supp. 2d at 1220 (statutory damages are “especially appropriate in default judgment cases due to infringer nondisclosure”). This case is no exception.

This Court may award statutory damages “without holding an evidentiary hearing based upon affidavits and other documentary evidence if the facts are not disputed.” *Perry Ellis Int’l, Inc. v. URI Corp.*, No. 06-22020-CIV, 2007 WL 3047143, at *1 (S.D. Fla. Oct. 18, 2007). Although the Court is permitted to conduct a hearing on a default judgment regarding damages pursuant to Fed. R. Civ. P. 55(b)(2)(B), an evidentiary hearing is not necessary where there is sufficient evidence on the record to support the request for damages. *See SEC v. Smyth*, 420 F.3d 1225, 1232 n.13 (11th Cir. 2005) (“Rule 55(b)(2) speaks of evidentiary hearings in a permissive tone . . . We have held that no such hearing is required where all essential evidence is already of record.”) (citations omitted); *see also PetMed Express*, 336 F. Supp. 2d at 1223 (entering default judgment, permanent injunction and statutory damages in a Lanham Act case without a hearing).

Here, the allegations in the Amended Complaint, which are taken as true, clearly establish Defendants intentionally copied Plaintiff’s Marks for the purpose of deriving the benefit of

Plaintiff's famous reputation. As such, the Lanham Act permits the Court to award up to \$2,000,000 per infringing mark on each type of good as statutory damages to ensure that Defendants do not continue their intentional and willful counterfeiting activities.

The evidence in this case demonstrates each Defendant promoted, distributed, advertised, offered for sale, and/or sold at least one (1) type of good bearing and/or using at least one (1) mark which were in fact counterfeits of at least one of Plaintiff's Marks. *See* Amended Complaint, ECF No. [20], ¶¶ 15, 24, 49; Thierry Decl., ECF No. [9-1] ¶¶ 5, 11-13; Thierry Decl. in Support of Motion, ECF No. [41-1] ¶ 5 and Ex. 1 thereto, ECF No. [41-2]; Burns Decl., ECF No. [9-3] ¶ 4 and Comp. Ex. 1 thereto, ECF Nos. [9-4 through 9-6]; Burns Decl. in Support of Notice, ECF No. [39-1] ¶ 5 and Comp. Ex. 1 thereto, ECF No. [39-2]. Based on the above considerations, Plaintiff suggests the Court award statutory damages by starting with a baseline of twenty thousand dollars (\$20,000.00), trebled to reflect Defendants' willfulness, and doubled for the purpose of deterrence, resulting in one hundred twenty thousand dollars (\$120,000.00) per trademark counterfeited per type of good offered for sale and/or sold per Defendant. *See* Thierry Decl. in Support of Motion, ECF No. [41-1] ¶¶ 5-6 and Ex. 1 thereto, ECF No. [41-2]. The award should be sufficient to deter Defendants and others from continuing to counterfeit or otherwise infringe Plaintiff's trademarks, compensate Plaintiff, and punish Defendants, all stated goals of 15 U.S.C. § 1117(c). The Court finds that this award of statutory damages falls within the permissible statutory range under 15 U.S.C. § 1117(c) and is just.

E. Damages for False Designation of Origin

Plaintiff's Amended Complaint also sets forth a cause of action for false designation of origin pursuant to § 43(a) of the Lanham Act (Count II). *See* 15 U.S.C. § 1125(a). As to Count II, the allowed scope of monetary damages is also encompassed in 15 U.S.C. § 1117(c). Accordingly,

judgment on Count II is limited to the amount awarded pursuant to Count I and entry of the requested equitable relief.

F. Damages for Cybersquatting

Plaintiff's Complaint also sets forth a cause of action against Defendant Numbers 1-2 (the "Cybersquatting Defendants") for cybersquatting pursuant to the ACPA, 15 U.S.C. § 1125(d). As admitted by default, and established by the evidence submitted, the Cybersquatting Defendants have acted with the bad-faith intent to profit from the Goyard Marks and the goodwill associated with the Goyard Marks by registering their corresponding E-commerce Store Name (the "Cybersquatted E-commerce Store Names"). *See* ECF No. [20] at ¶ 64. The Cybersquatted E-commerce Store Names incorporate one or more of the Goyard Marks in their entirety, surrounded by descriptive or generic terms, rendering the domain names nearly identical to the Goyard Marks.

Upon a finding of liability, the ACPA expressly empowers the Court to "order the forfeiture or cancellation of the domain name or the transfer of the domain name to the owner of the mark." 15 U.S.C. § 1125(d)(1)(c); *Victoria's Cyber Secret Ltd. P'ship v. Secret Catalogue, Inc.*, 161 F. Supp. 2d 1339, 1356 (S.D. Fla. 2001). Accordingly, Plaintiff is entitled to the transfer and ownership of the Cybersquatted E-commerce Store Names because they are confusingly similar to at least one of the Goyard Marks.

Additionally, Plaintiff may elect at any time before final judgment to recover actual damages or statutory damages of not less than \$1,000.00 and not more than \$100,000.00 per domain name, as the court considers just. 15 U.S.C. § 1117(d). Plaintiff has elected statutory damages and requests, in view of the Cybersquatting Defendants' intentional, wrongful behavior, an award in the amount of \$10,000.00 for each of the Cybersquatted E-commerce Store Names. *See* ECF No. [41] at 20-23; *see also Taverna Opa Trademark Corp. v. Ismail*, 2010 U.S. Dist. LEXIS 53606, 2010 WL 1838384, at *3 (S.D. Fla. May 6, 2010) (awarding \$10,000.00 in statutory

damages for domain name at issue). The Court finds that this amount is reasonable and, therefore, awards such damages.

G. Damages for Common Law Unfair Competition and Trademark Infringement

Plaintiff's Amended Complaint further sets forth a cause of action under Florida's common law of unfair competition (Count IV) and trademark infringement (Count V). Judgment on Count IV and Count V are also limited to the amount awarded pursuant to Count I and entry of the requested equitable relief.

IV. CONCLUSION

Accordingly, it is **ORDERED AND ADJUDGED** that Plaintiff's Motion, **ECF No. [41]**, is **GRANTED** against those Defendants listed in the attached Schedule "A." Default Final Judgment will be entered by separate order.

DONE AND ORDERED in Chambers at Miami, Florida, on _____, 2024.

BETH BLOOM
UNITED STATES DISTRICT JUDGE

Copies to:

Counsel of Record

SCHEDULE "A"
DEFENDANTS BY NUMBER, E-COMMERCE STORE NAME,
FINANCIAL ACCOUNT INFORMATION, AND E-MAIL ADDRESSES

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	admin@goyardbagus.com	
			T79AXJ8NTH534	ajuovph@hotmail.com		
			TUUFZCZW2DUL54	jwovgbbpb@hotmail.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 help@luybagsonline.shop	
		LUXtpURYBAGSALEsf	PJSDJ8X5WPFVE		help@luybagsonline.shop	
4	luxesbag.shop	LUXBAGONLINE	MLLCUQ5WLJB2N		Support@zngogo.com	
		Luybagq	CPMHBE54LTRD6			
4	topbagsnew.shop	LUXURYBAGSALEs	H8WS8VQZYWJEW		Support@zngogo.com 547602388@qq.com	
		LUXURYBAGSALEssd	5NQJRJ4QRZVYN		Support@zngogo.com help@luybagsonline.shop	
		LUXtpURYBAGSALEsf	PJSDJ8X5WPFVE		help@luybagsonline.shop	
					topbagshub@gmail.com contact@topqualitybags.com	
5	buyqualitybags.com		2444YDDM2597J	79886689@qq.com		

		Tabren Aubrey Smith	RQLTT8ZY2 YWL6	keithgrainger90 @outlook.com		
			KV5T4GV3K AKZJ	Usamamanzoor stripe@gmail.c om	topbagshub@g mail.com	
5	topqualitybags.com	雅翠 韦		627907509@q q.com	contact@topqua litybags.com	
6	byaneity.com	Byaneity	GNJEDFUTP XESS		service@unigav e.com service@byaneit y.com	
7	casebig.com		TFSNLFL6A NVF6 25E24C52YC KYQ		favocase@gmail .com sales@Casebig. com	
8	casefeely.com	CASEFEEL Y	Y4HM7FMW 95PWW		support@casefe ely.com	
9	caseshunter.com		VAYBUU357 F444 KJRL6UYU3 FWJU		admin@caseshu nter.com	
10	cinderellastores.com	Rokki Agbotsu	2357NLWTJ3 8GJ		info@cinderella stores.com cinderellastoren z@gmail.com	
11	crozus.com		NJU2X7GLD 5X86 CMGUNSJJL VGA6 P3VJHHV6Q P33N		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 alexissaveryprpe ws@gmail.com cntopshoes@gm ail.com sales@wmtbag.s hop	
13	wshubag.shop	文 智弘 @41y8	KF29JLWXM CQWA	asd763881227 @163.com	support@wshub ag.shop worldsroderickt hyiqph@gmail.c om sales@wshubag. shop	
13	xknbag.shop	文 智弘 @41y8	KF29JLWXM CQWA		support@xknba g.shop cntopshoes@gm ail.com sales@xknbag.s hop	
14	gorchic.com	Hefei Jiao Kun Trading Co., Ltd. 广州市白云 区黄石浩多 好百货店	PT465C2FK4 F7S Z8GYFR5GS GRNU	gzhdhcorp@ou tlook.com	service@gorchi c.com	
14	gorchic.us	Hefei Jiao Kun Trading Co., Ltd.	PT465C2FK4 F7S ZU5WRREP DXNK4	lindashuai1995 @gmail.com	service@gorchi c.com service@gorchi c.net	
15	high-endbags01.com		WHFLXXCT HQ2QY	cong_0617@q q.com	xxx@163.com	

			S3QM9XY3G8WJJ	2635378051@qq.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		ZQBVLPZ487SS4	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.biz support@temafes.net	
22	temaap.com		K9NVCKFEB T27W		support@temaap.com support@fasbags.shop	
22	temafes.us		K9NVCKFEB T27W RKDTKNJF57938		sale@temafes.biz support@temafes.net support@temafes.net	
23	racastudio.com	Raca Studio Pty Ltd	SFNPZT873B UCJ		hello@racastudio.com	
24	tgey.top	Qiansheng TRADING Co.LTD	WE4RF8RW7 CUWG		Allison54321aa@outlook.com	
25	theluxhouse.net	Fashion Venue	LVN357P5CL TWC	davidruffinjr@yahoo.com	info@theluxhouse.net theluxhouse1@gmail.com	
26	thetotetrove.myshopify.com	LuxuryHub	V8A8PG45Z HLVQ		ameliaavaforyou@gmail.com store+79032254753@t.shopifyemail.com avasophiaforyou@gmail.com	

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				huixiang-2022@outlook.com	vincystore@hotmail.com	
				fangxi-2022@outlook.com	vincystore@hotmail.com	
28	viokshop.com		KF44JSYPRD6SC	wuwupei@outlook.com	besttopstores_service@outlook.com	
29	vittoriaparumbell.com	VittoriaParumbell	3HZNUQB8YTJY6		vittoriaparumbell.com@gmail.com sales@vittoriaparumbell.com	