

**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 TO AMEND DEFAULT FINAL JUDGMENT
AND PERMANENT INJUNCTION TO INCLUDE AN ADDITIONAL
E-COMMERCE STORE NAME OPERATED BY DEFENDANT NUMBER 10**

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

1. I am over 18 years of age and have personal knowledge of the truth of the matters set forth herein. If called upon to do so, I could and would competently testify as to the following facts in support of Plaintiff's Motion to Amend the Court's Default Final Judgment and Permanent Injunction to Include an Additional E-commerce Store Name Operated by Defendant Number 10 (the "Motion to Amend Permanent Injunction").

2. I am employed by Plaintiff, Goyard St-Honore ("Goyard") as a 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 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 November 19, 2024, Goyard filed its Motion for Entry of Default Final Judgment Against Defendants (the “Motion for Default Final Judgment”) ECF No. [41]. I hereby incorporate by reference all factual allegations contained in my declaration filed in support of Goyard’s Motion for Default Final Judgment ECF No. [41-1]. On December 4, 2024, this Court granted Goyard’s Motion for Default Final Judgment ECF No. [42, docketed Dec. 5, 2024] and entered a Default Final Judgment and Permanent Injunction against Defendants (the “Default Final Judgment”) ECF No. [43, docketed Dec. 5, 2024].

5. Goyard has been continuing its investigation into Defendants’ counterfeiting operations and recently determined Defendant Number 10 - cinderellastores.com, already enjoined, (the “Noncomplying Defendant”) is continuing to engage in and expand its unlawful use of the Goyard Marks identified in Paragraph 15 of the Amended Complaint ECF No. [20], by registering, operating, and/or maintaining the newly discovered e-commerce store name set forth on Schedule “A” hereto (the “Additional E-commerce Store Name”). Specifically, the Noncomplying Defendant is promoting, advertising, offering for sale, and/or selling a variety of products under counterfeits of the Goyard Marks without Goyard’s authorization via at least the e-commerce store operating under the Additional E-commerce Store Name. The Noncomplying Defendant does not have, nor has it ever had, the right or authority to use the Goyard Marks for any purpose. Further, the Goyard Marks have never been assigned or licensed to be used on the e-commerce store operating under the Additional E-commerce Store Name.

6. Prior to filing this Declaration, Goyard’s counsel, Stephen M. Gaffigan, P.A., accessed the Noncomplying Defendant’s e-commerce store operating under the E-commerce Store

Name to capture and download relevant web pages displaying Goyard's branded items offered for sale. The e-commerce store advertises, offers for sale, and/or promotes products using various counterfeits and/or infringements of Goyard trademarks. The e-commerce store appears to be fully-interactive, prominently displaying one or more of Goyard's trademarks, and appears to allow users to browse the online store for products under those trademarks. Further, the e-commerce store appears to allow users to add products to the online shopping cart, proceed to a point of checkout, and otherwise actively exchange data with the e-commerce store. At the conclusion of the process, the detailed web page captures of the Goyard branded products captured by Goyard's counsel were sent to Goyard for inspection. (See Declaration of T. Raquel Wiborg Rodriguez in Support of Plaintiff's Motion to Amend Permanent Injunction and Comp. Ex. "1" attached thereto.) I personally reviewed the detailed web page captures reflecting the e-commerce store's use of Goyard's trademarks in connection with the various products and/or services offered for sale by Defendant via the Additional E-Commerce Store Name, and I determined the e-commerce store was not affiliated with or approved by Goyard. I reached this conclusion through my visual inspection of the e-commerce store, and because I personally know Goyard does not conduct business with Defendant or its e-commerce store, nor does Defendant have the right or authority to use the Goyard Marks for any purpose. True and correct copies of the printouts reflecting samples of the website I reviewed, which were downloaded by Goyard's counsel's office, Stephen M. Gaffigan, P.A., are attached to Comp. Ex. "1" to the Declaration of T. Raquel Wiborg-Rodriguez in Support of Plaintiff's Motion to Amend Permanent Injunction.

7. In view of the foregoing, I can confirm the Goyard branded products the Noncomplying Defendant is offering for sale and promoting under the Goyard Marks via the newly discovered e-commerce store operating under the Additional E-commerce Store Name are non-

genuine Goyard products. Furthermore, I can confirm the Noncomplying Defendant does not have authorization to use the Goyard Marks or name in connection with the Additional E-commerce Store Name.

8. As a result of the availability of the non-genuine Goyard branded goods being offered for sale by the Noncomplying Defendant, Goyard will experience irreparable damage to its reputation among consumers unless the Noncomplying Defendant's infringing and counterfeiting activities are stopped.

I declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct. Executed: 2025-12-03 at Paris, France.

Jean-Laurent Thierry

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

SCHEDULE "A"
NONCOMPLYING DEFENDANT BY NUMBER AND
ADDITIONAL E-COMMERCE STORE NAME

Defendant Number	Defendant / Additional E-commerce Store Name
10	cinderellastouch.com