

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.) **NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.**

I. (a) PLAINTIFFS AUDEMARS PIGUET HOLDING SA, BREITLING U.S.A. INC., CHANEL, INC., GUCCI AMERICA, INC., HENRI STERN WATCH (b) County of Residence of First Listed Plaintiff _____ (EXCEPT IN U.S. PLAINTIFF CASES) (c) Attorney's (Firm Name, Address, and Telephone Number) Stephen M. Gaffigan/STEPHEN M. GAFFIGAN, P.A. 401 East Las Olas Blvd., #130-453, Ft. Lauderdale, Florida 33301 Telephone: 954-767-4819	DEFENDANTS BLUELANS, CHENGLIAN, CRAZY STORE, ENGHUANIU, ETHEREAL, EVERGRAND, FASHION&PRETTY, County of Residence of First Listed Defendant _____ (IN U.S. PLAINTIFF CASES ONLY) NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT LAND INVOLVED. Attorneys (If Known)
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(d) Check County Where Action Arose: ☐ MIAMI-DADE ☐ MONROE ☒ BROWARD ☐ PALM BEACH ☐ MARTIN ☐ ST. LUCIE ☐ INDIAN RIVER ☐ OKEECHOBEE HIGHLANDS

II. BASIS OF JURISDICTION (Place an "X" in One Box Only) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant) <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>PTF</th> <th>DEF</th> <th></th> <th>PTF</th> <th>DEF</th> </tr> </thead> <tbody> <tr> <td>Citizen of This State</td> <td><input type="checkbox"/> 1</td> <td><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business In This State</td> <td><input type="checkbox"/> 4</td> <td><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business In Another State</td> <td><input type="checkbox"/> 5</td> <td><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td><input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> </tr> </tbody> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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IV. NATURE OF SUIT (Place an "X" in One Box Only)					
CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	FORFEITURE/PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input checked="" type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property
CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities Employment <input type="checkbox"/> 446 Amer. w/Disabilities Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General Habeas Corpus: <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition				

V. ORIGIN (Place an "X" in One Box Only)
☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Re-filed- (see VI below) ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. RELATED/RE-FILED CASE(S).	a) Re-filed Case <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO b) Related Cases <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO (See instructions second page): JUDGE _____ DOCKET NUMBER _____	
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VII. CAUSE OF ACTION Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity):
 Trademark infringement and counterfeiting pursuant to 15 USC 1114
 LENGTH OF TRIAL via 5 days estimated (for both sides to try entire case)

VIII. REQUESTED IN COMPLAINT: ☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 **DEMAND \$** _____ **CHECK YES only if demanded in complaint:**
JURY DEMAND: ☐ Yes ☒ No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE SIGNATURE OF ATTORNEY OF RECORD: Stephen M. Gaffigan DATE: November 16, 2018
 FOR OFFICE USE ONLY
 AMOUNT: _____ RECEIPT #: _____ IFP: _____

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

AUDEMARS PIGUET HOLDING SA, BREITLING U.S.A. INC.,
CHANEL, INC., GUCCI AMERICA, INC., HENRI STERN WATCH
AGENCY, INC., HUBLOT SA, GENÈVE, COMPAGNIE DES
MONTRES LONGINES, FRANCILLON S.A.,
MOVADO LLC, OMEGA SA, RADO UHREN AG, TURLEN
HOLDING SA, and LVMH SWISS MANUFACTURES SA,

Plaintiffs,

vs.

BLUELANS, CHENGLIAN, CRAZY STORE, ENGHUANIU,
ETHEREAL, EVERGRAND, FASHION&PRETTY, FLEECEBOO,
GUOMIAOMIAO1314, HERUN INDUSTRIAL CO., LTD.,
ZHEJIANG, JIANGLINA, JIANGQIONG STORE, JINGJIANSTORE,
MENGHONGYAN, MINGXINGBIAOYEYOUXIANGONGSI,
MONTH CLOUD, ROADTOALLWAYS,
SHENZHENSHIQINGMEIKEJIYOUXIANGONGSI,
SHIXIN888999666, SILVER CHINESE, TOPBIRDY, WEIYE,
XINLINGZHONGBIAO, YICHENG TESCO, GOD BLESS US & MY
TIME ZONE STORE, MY TIME ZONE, WATCHESTIME,
BEST4CHOOSE, CORPOR2008, GUDAOXIAGU-0, JOFTBENN7,
KHER6424, MIKI2016, SPRINGENN, FAFAFA8886,
KISSCOME0411, LEEHOMWANG, PAYCAY, VIVAQ8,
WRISTWATCHESHERE, ZHIMAKAIHUA2015,
BAGAHOLICS20000, BESTWATCHES88, HB_LUXURY_BAGS,
HYPE_REPLUG, LUXURY_BAG_SHOES_SHOP,
LUXURYBRAND.FACTORY1314, LUXURYGIRL9328,
MSHOP8_TEL_89516445438, ROLEXFULLDIAMANTES,
ROLEXWATCH2018, WATCH_HAPPENS, WATCHESPAGES,
PHAN.OFFICIAL9 a/k/a PHANOFFICIAL.COM,
XFASHION_BOUTIQUE222 a/k/a KINGLUXURY222.COM,
CLASSEMPORIUM.COM, and
SWISSREPLICAWATCHESININDIA.COM, each an Individual,
Partnership, Business Entity, or Unincorporated Association,

Defendants.

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COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

Plaintiffs, Audemars Piguet Holding SA, Breitling U.S.A. Inc., Chanel, Inc., Gucci
America, Inc., Henri Stern Watch Agency, Inc., Hublot SA, Genève, Compagnie des Montres
Longines, Francillon S.A., Movado LLC, Omega SA, Rado Uhren AG, Turlen Holding SA, and

LVMH Swiss Manufactures SA (collectively “Plaintiffs”), hereby sue Defendants, individuals, partnerships, business entities, or unincorporated associations identified in the caption, which are set forth on Schedule “A” hereto (collectively “Defendants”). Defendants are promoting, selling, offering for sale and/or distributing goods bearing counterfeits and confusingly similar imitations of Plaintiffs’ respective trademarks within this district through at least the Internet based e-commerce stores, social media accounts, and commercial Internet website operating under their seller identities and domain names identified on Schedule “A” hereto (the “Seller IDs and Subject Domain Names”). In support of their claims, Plaintiffs allege as follows:

JURISDICTION AND VENUE

1. This is an action for federal trademark counterfeiting and infringement, false designation of origin, common law unfair competition, and common law trademark infringement, pursuant to 15 U.S.C. §§ 1114, 1116, and 1125(a), The All Writs Act, 28 U.S.C. § 1651(a), and Florida’s common law. Accordingly, this Court has subject matter jurisdiction over this action pursuant to 15 U.S.C. § 1121 and 28 U.S.C. §§ 1331 and 1338. This Court has supplemental jurisdiction pursuant to 28 U.S.C. § 1367 over Plaintiffs’ state law claims because those claims are so related to the federal claims that they form part of the same case or controversy.

2. Defendants are subject to personal jurisdiction in this district, because they direct business activities toward and conduct business with consumers throughout the United States, including within the State of Florida and this district through at least the Internet based e-commerce stores, social media accounts, or fully interactive commercial Internet websites accessible in Florida and operating under the Seller IDs and Subject Domain Names.

3. Venue is proper in this Court pursuant to 28 U.S.C. § 1391 since Defendants are, upon information and belief, aliens engaged in infringing activities and causing harm within this district by advertising, offering to sell, selling, and/or shipping infringing products into this district.

THE PLAINTIFFS

4. Audemars Piguet Holding SA (“Audemars Piguet”) is a societe anonyme organized under the laws of Switzerland, having its principal office in Le Brassus, Switzerland. Audemars Piguet, through and in connection with related companies, designs, manufactures, markets, and sells watches and related goods throughout the world, including within this district, under multiple world-famous common law and federally registered trademarks including the trademarks identified in Schule “B” hereto.

5. Breitling U.S.A. Inc. (“Breitling USA”), is a corporation organized and existing under the laws of the State of Connecticut with its principal place of business in the United States in Wilton, Connecticut. Breitling USA is a subsidiary of Breitling SA, a corporation organized and existing under the laws of Switzerland. Breitling SA designs, manufactures, markets, and sells Breitling branded watches and related goods. Breitling USA is the exclusive distributor of Breitling brand watches in the United States. Breitling USA and Breitling SA are collectively referred to herein as “Breitling.” Breitling designs, manufactures, markets, and sells watches and related goods throughout the world, including this district, under multiple world-famous common law and federally registered trademarks including the trademarks identified in Schedule “C” hereto.

6. Chanel, Inc. (“Chanel”) is a corporation organized under the laws of the State of New York with its principal place of business in the United States in New York, New York.

Chanel is, in part, engaged in the business of manufacturing and distributing throughout the world, including within this district, a variety of high quality luxury goods, including watches and related goods, under multiple world famous common law and federally registered trademarks, including those identified in Schedule “D” hereto.

7. Gucci America, Inc. (“Gucci”) is a corporation organized and existing under the laws of the State of New York with its principal place of business in New York, New York. Gucci is, in part, engaged in the business of manufacturing and distributing throughout the world, including within this district, a variety of high quality luxury goods, including watches and related goods, under multiple world-famous common law and federally registered trademarks, including those identified in Schedule “E” hereto.

8. Henri Stern Watch Agency, Inc. (“Henri Stern”) is a corporation organized and existing under the laws of the State of New York with its principal place of business in the United States New York, New York. Henri Stern is a subsidiary of Patek Philippe SA Geneve, a societe anonyme organized under the laws of Switzerland. Patek Philippe SA Geneve designs, develops, and markets Patek Philippe brand watches and related goods. Henri Stern is the exclusive importer and distributor of Patek Philippe brand watches in the United States. Patek Philippe SA Geneve and Henri Stern are collectively referred to herein as “Patek Philippe.” Patek Philippe designs, develops, markets, and sells watches and related goods throughout the world, including within this district, under multiple world-famous common law and federally registered trademarks including the trademarks identified in Schedule “F” hereto.

9. Hublot SA, Genève (“Hublot”) is a societe anonyme organized under the laws of Switzerland with a principal place of business in Geneve, Switzerland. Hublot, through and in connection with related companies, designs, manufactures, markets, and sells watches and

related goods throughout the world, including within this district, under multiple world-famous common law and federally registered trademarks including the trademarks identified in Schedule “G” hereto.

10. Compagnie des Montres Longines, Francillon S.A. (“Longines”) is a corporation organized and existing under the laws of Switzerland with its principal place of business located in Saint-Imier, Switzerland. Longines manufactures, markets, and sells watches and related goods throughout the world, including within this district, under multiple world-famous common law and federally registered trademarks including the trademarks identified in Schedule “H” hereto

11. Movado LLC (“Movado”) is a limited liability company organized under the laws of the State of Delaware with its principal place of business in the United States in Wilmington, Delaware. Movado, through and in connection with related companies, manufactures, markets, and sells watches and related goods throughout the world, including within this district, under multiple world-famous common law and federally registered trademarks including the trademarks identified in Schule “I” hereto

12. Omega SA (“Omega”) is a societe anonyme organized under the laws of Switzerland with its principal place of business located in Bienne, Switzerland. Omega manufactures, markets, and sells watches and related goods throughout the world, including within this district, under multiple world-famous common law and federally registered trademarks including the trademarks identified in Schedule “J” hereto.

13. Rado Uhren AG (“Rado”) is a corporation organized and existing under the laws of Switzerland with its principal place of business located in Lengnau, Switzerland. Rado manufactures, markets, and sells watches and related goods throughout the world, including

within this district, under multiple world-famous common law and federally registered trademarks including the trademarks identified in Schedule “K” hereto

14. Turlen Holding SA (“Turlen”) is a societe anonyme organized under the laws of Switzerland with its principal place of business located in Les Breuleux, Switzerland. Turlen, through and in connection with related companies manufactures, markets, and sells watches and related goods throughout the world, including within this district, under multiple world-famous common law and federally registered trademarks including the Richard Mille trademarks identified in Schedule “L” hereto.

15. LVMH Swiss Manufactures SA (“LVMH”) is a societe anonyme organized under the laws of Switzerland with a principal place of business in La Chaux-de-Fonds, Switzerland. LVMH, through and in connection with related companies manufactures, markets, and sells watches and related goods throughout the world, including within this district, under multiple world-famous common law and federally registered trademarks including the Tag Heuer trademarks identified in Schedule “M” hereto.

16. Each Plaintiff is a member of the Federation of the Swiss Watch Industry FH (“the Federation”), a non-profit trade association with its principal place of business in Bienne, Switzerland. The Federation and its predecessors have been protecting the interests of the Swiss watch industry for more than 150 years. The Federation is the Swiss watch industry's leading trade association with nearly 500 members, representing more than 90% of all Swiss watch manufacturers. In 1999, the Federation created the Anti-Counterfeiting Group, which was established to combat common sources of counterfeit goods which cause a common harm to its members’ respective brands, individually and to the Swiss watch industry in its entirety, which results in further harm to each member’s brand. Since 1999, the Federation through its anti-

counterfeiting division, has worked with international law enforcement and government agencies to conduct raids and investigations of counterfeit operations, as well as raise public awareness regarding the issue. The aim of the Federation is to contribute to the protection and development of the Swiss Watch Industry, to represent the latter to the Swiss authorities and to foreign and international authorities, and to defend the interests of its members on a judicial level.

17. The Federation is authorized by the Swiss government to enforce the standards established by Swiss law concerning the geographical origin and quality associated with Swiss watches. As part of its efforts to protect the use the Swiss geographical designation for watches, the Federation obtained certification trademarks for the terms Swiss and Swiss Made (collectively, “Swiss Marks”), which are valid and registered on the Principal Register of the United States Patent and Trademark Office and are used in connection with watches and other horological instruments of Swiss origin. The Federation’s members, including Plaintiffs, have expended substantial time, money and other resources ensuring that their genuine goods meet the exacting standards established by the Federation as part of a combined effort to guarantee that consumers can expect certain quality attributes from watches permitted to use the Swiss and Swiss Made Marks in combination with Plaintiffs’ own marks.

18. The Swiss Marks are used by many Defendants together with Plaintiffs’ respective trademarks in connection with the sale of watches which, upon information and belief, do not comply with the certification standards for the use of the Swiss Marks. Through the sale of counterfeit and infringing watches bearing Plaintiffs’ respective trademarks and the Swiss Marks, these Defendants are causing a common harm to Plaintiffs, namely diminution of the value associated with the overall market for genuine, certified Swiss made watches, resulting in further harm to each Plaintiff

19. Plaintiffs' trademarked goods are sold within the State of Florida, including this district, through their boutiques and at high quality and prestigious retailers which are carefully selected and satisfy certain criteria. Defendants, through the sale and offer to sell counterfeit and infringing versions of Plaintiffs' respective branded products, are directly, and unfairly, competing with each Plaintiffs' economic interests in the State of Florida and causing each Plaintiff harm within this jurisdiction.

20. Like many other famous trademark owners, Plaintiffs suffer ongoing daily and sustained violations of their respective trademark rights at the hands of counterfeiters and infringers, such as Defendants herein, who wrongfully reproduce and counterfeit Plaintiffs' respective trademarks for the twin purposes of (i) duping and confusing the consuming public and (ii) earning substantial profits. The natural and intended byproduct of Defendants' actions is the erosion and destruction of the goodwill associated with Plaintiffs' respective famous names and trademarks, as well as the destruction of the legitimate market sector in which they operate.

21. In order to combat the indivisible harm caused by the combined actions of Defendants and others engaging in similar conduct, each year Plaintiffs expend significant resources in connection with trademark enforcement efforts, including legal fees, investigative fees, and support mechanisms for law enforcement such as field training guides and seminars. The exponential growth of counterfeiting over the Internet, particularly through online marketplace and social media platforms, has created an environment that require companies, such as Plaintiffs, to expend significant time and money across a wide spectrum of efforts in order to protect both consumers and themselves from the ill effects of confusion and the erosion of the goodwill connected to Plaintiffs' respective brands.

THE DEFENDANTS

22. Defendants are individuals and/or business entities of unknown makeup, each of whom, upon information and belief, either reside and/or operate in foreign jurisdictions, or redistribute products from the same or similar sources in those locations. Defendants have the capacity to be sued pursuant to Federal Rule of Civil Procedure 17(b). Defendants target their business activities towards consumers throughout the United States, including within this district, through the operation of, at least, one Internet e-commerce store or social media account via the Internet marketplace websites or social media platform Amazon.com, eBay.com, iOffer.com, Wish.com, and/or Instagram.com under the Seller IDs, or the commercial Internet websites under the Subject Domain Names.

23. Defendants are the past and present controlling forces behind the sale of products bearing counterfeits and infringements of Plaintiffs' individual trademarks as described herein using at least the Seller IDs and Subject Domain Names.

24. Upon information and belief, Defendants directly engage in unfair competition with Plaintiffs by advertising, offering for sale, and selling goods bearing counterfeits and infringements of one or more of Plaintiffs' respective trademarks to consumers within the United States and this district through Internet based e-commerce stores, social media accounts, or commercial Internet websites using, at least, the Seller IDs and Subject Domain Names, and additional seller identification aliases or domains names not yet known to Plaintiffs. Defendants have purposefully directed some portion of their illegal activities towards consumers in the State of Florida through the advertisement, offer to sell, sale, and/or shipment of counterfeit and infringing branded versions of one or more of Plaintiffs' respective goods into the State.

25. Defendants have registered, established or purchased, and maintained the Seller IDs and Subject Domain Names. Upon information and belief, Defendants may have engaged in fraudulent conduct with respect to the registration of the Seller IDs and Subject Domain Names. Upon information and belief, some Defendants have maintained the Seller IDs and Subject Domain Names for the sole purpose of engaging in illegal counterfeiting activities.

26. Upon information and belief, Defendants will continue to register or acquire new seller identification aliases and domain names for the purpose of selling and offering for sale goods bearing counterfeit and confusingly similar imitations of one or more of Plaintiffs' trademarks unless preliminarily and permanently enjoined.

27. Defendants' use their Internet-based businesses to infringe the intellectual property rights of Plaintiffs and others.

28. Defendants' business names, i.e., the Seller IDs and Subject Domain Names, associated payment accounts, and any other alias seller identification names and domain names, used in connection with the sale of counterfeit and infringing goods bearing one or more of Plaintiffs' trademarks are essential components of Defendants' online activities and are one of the means by which Defendants further their counterfeiting and infringement scheme and cause harm to Plaintiffs. Moreover, Defendants are using one or more of Plaintiffs' respective famous names and/or trademarks to drive Internet consumer traffic to their e-commerce stores, social media accounts, and/or websites operating under the Seller IDs and Subject Domain Names, thereby increasing the value of the Seller IDs and Subject Domain Names and decreasing the size and value of Plaintiffs' legitimate marketplace at Plaintiffs' expense.

COMMON FACTUAL ALLEGATIONS

Audemars Piguet's Rights

29. Audemars Piguet is the owner of the trademarks identified on Schedule "B" hereto (the "Audemars Piguet Marks"), which are valid and registered on the Principal Register of the United States Patent and Trademark Office. The Audemars Piguet Marks are used in connection with the manufacture and distribution of, among other things, high quality watches and related goods. True and correct copies of the Certificates of Registration for the Audemars Piguet Marks are attached hereto as Exhibit "1."

30. Long before the Defendants began their infringing activities complained of herein, the Audemars Piguet Marks have been used Audemars Piguet in interstate commerce to identify and distinguish Audemars Piguet's high quality watches and related goods for an extended period of time and serve as symbols of Audemars Piguet's quality, reputation and goodwill.

31. Further, Audemars Piguet and related companies have expended substantial time, money and other resources developing, advertising and otherwise promoting the Audemars Piguet Marks. Audemars Piguet and related companies have spent millions of dollars to extensively advertise and promote products under the Audemars Piguet Marks in magazines, newspapers, on the Internet and in other media worldwide, including the official Audemars Piguet website, www.audemarspiguet.com. The Audemars Piguet Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

32. Audemars Piguet and related companies have extensively used, advertised and promoted the Audemars Piguet Marks in the United States in connection with the sale of high quality watches and related goods. As a result of these efforts, the Audemars Piguet Marks are

among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as identifiers of high quality goods.

33. Audemars Piguet has carefully monitored and policed the use of the Audemars Piguet Marks and has never assigned or licensed the Audemars Piguet Marks to any of the Defendants in this matter.

34. Genuine goods bearing the Audemars Piguet Marks are widely legitimately advertised and promoted by Audemars Piguet and related companies, authorized distributors, and unrelated third parties via the Internet. Over the course of the several years, visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Audemars Piguet's overall marketing and consumer education efforts. Thus, Audemars Piguet and related companies expend significant monetary resources on Internet marketing and consumer education, including SEO strategies. Those strategies allow Audemars Piguet and its authorized retailers to fairly and legitimately educate consumers about the value associated with the Audemars Piguet Marks and the goods sold thereunder. Similarly, Amazon.com's, eBay.com's, iOffer.com's, Wish.com's, and Instagram.com's individual user accounts are indexed on search engines and compete directly with Audemars Piguet for space in the search results.

Breitling's Rights

35. Breitling USA is the owner of the trademarks identified on Schedule "C" hereto (the "Breitling Marks"), which are valid and registered on the Principal Register of the United States Patent and Trademark Office. The Breitling Marks are used in connection with the manufacture and distribution of, among other things, high quality watches and related goods.

True and correct copies of the Certificates of Registration for the Breitling Marks are attached hereto as Exhibit “2.”

36. Long before the Defendants began their infringing activities complained of herein, the Breitling Marks have been used in interstate commerce to identify and distinguish Breitling’s high quality watches and related goods for an extended period of time and serve as symbols of Breitling’s quality, reputation and goodwill.

37. Further, Breitling has expended substantial time, money and other resources developing, advertising and otherwise promoting the Breitling Marks. Breitling has spent millions of dollars to extensively advertise and promote products under the Breitling Marks in magazines, newspapers, on the Internet and in other media worldwide, including the official Breitling website, www.breitling.com. The Breitling Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

38. Breitling has extensively used, advertised and promoted the Breitling Marks in the United States in connection with the sale of high quality watches and related goods. As a result of these efforts, the Breitling Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as identifiers of high quality goods.

39. Breitling has carefully monitored and policed the use of the Breitling Marks and has never assigned or licensed the Breitling Marks to any of the Defendants in this matter.

40. Genuine Breitling branded goods are widely legitimately advertised and promoted by Breitling, authorized distributors and unrelated third parties via the Internet. Over the course of the past several years, visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Breitling’s overall marketing

and consumer education efforts. Thus, Breitling expends significant monetary resources on Internet marketing and consumer education, including SEO strategies. Those strategies allow Breitling and its authorized retailers to fairly and legitimately educate consumers about the value associated with the Breitling Marks and the goods sold thereunder. Similarly, Amazon.com's, eBay.com's, iOffer.com's, Wish.com's, and Instagram.com's individual user accounts are indexed on search engines and compete directly with Breitling for space in the search results.

Chanel's Rights

41. Chanel is the owner of the trademarks identified on Schedule "D" hereto (the "Chanel Marks"), which are valid and registered on the Principal Register of the United States Patent and Trademark Office. The Chanel Marks are used in connection with the manufacture and distribution, among other things, high quality watches and related goods. True and correct copies of the Certificates of Registration for the Chanel Marks are attached hereto as Exhibit "3."

42. Long before the Defendants began their infringing activities complained of herein, the Chanel Marks have been used by Chanel in interstate commerce to identify and distinguish Chanel's high quality watches and related goods for an extended period of time and serve as symbols of Chanel's quality, reputation and goodwill.

43. Further, Chanel has expended substantial time, money and other resources developing, advertising and otherwise promoting the Chanel Marks. Chanel has spent millions of dollars to extensively advertise and promote products under the Chanel Marks in magazines, newspapers, on the Internet and in other media worldwide, including the official Chanel website, www.chanel.com. The Chanel Marks qualify as famous marks as that term is used in 15 U.S.C. § 1125(c)(1).

44. Chanel has extensively used, advertised, and promoted the Chanel Marks in the United States in association with the sale of high quality watches and related goods. As a result of these efforts, the Chanel Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as an identifier of high quality goods.

45. Chanel has carefully monitored and policed the use of the Chanel Marks and has never assigned or licensed the Chanel Mark to any of the Defendants in this matter.

46. Genuine goods bearing the Chanel Marks are widely legitimately advertised and promoted by Chanel, authorized distributors, and unrelated third parties. Over the course of the past several years, visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Chanel's overall marketing and consumer education efforts. Thus, Chanel expends significant monetary resources on Internet marketing and consumer education, including SEO strategies. Those strategies allow Chanel and its authorized retailers to fairly and legitimately educate consumers about the value associated with the Chanel Marks and the goods sold thereunder. Similarly, Amazon.com's, eBay.com's, iOffer.com's, Wish.com's, and Instagram.com's individual user accounts are indexed on search engines and compete directly with Chanel for space in the search results.

Gucci's Rights

47. Gucci is the owner of the trademarks identified on Schedule "E" hereto (the "Gucci Marks"), which are valid and registered on the Principal Register of the United States Patent and Trademark Office. The Gucci Marks are used in connection with the manufacture and distribution of, among other things, high quality watches and related goods. True and correct copies of the Certificates of Registration for the Gucci Marks are attached hereto as Exhibit "4."

48. Long before the Defendants began their infringing activities complained of herein, the Gucci Marks have been used by Gucci in interstate commerce to identify and distinguish Gucci's high quality watches and related goods for an extended period of time and serve as symbols of Gucci's quality, reputation and goodwill.

49. Further Gucci has expended substantial time, money and other resources developing, advertising and otherwise promoting the Gucci Marks. Gucci has spent millions of dollars promoting the Gucci Marks and products bearing the Gucci Marks in magazines, newspapers, on the Internet and in other media worldwide, including the official Gucci website, www.gucci.com. The Gucci Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

50. Gucci has extensively used, advertised, and promoted the Gucci Marks in the United States in association with the sale of high quality watches and related goods. As a result of these efforts, the Gucci Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as an identifier of high quality goods.

51. Gucci has carefully monitored and policed the use of the Gucci Marks and has never assigned or licensed the Gucci Marks to any of the Defendants in this matter.

52. Genuine goods bearing the Gucci Marks are widely legitimately advertised and promoted by Gucci, authorized distributors, and unrelated third parties via the Internet. Over the course of the past several years, visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Gucci's overall marketing and consumer education efforts. Thus, Gucci expends significant monetary resources on Internet marketing and consumer education, including SEO strategies. Those strategies allow

Gucci and its authorized retailers to fairly and legitimately educate consumers about the value associated with the Gucci Marks and the goods sold thereunder. Similarly, Amazon.com's, eBay.com's, iOffer.com's, Wish.com's, and Instagram.com's individual user accounts are indexed on search engines and compete directly with Gucci for space in the search results.

Patek Philippe's Rights

53. Henri Stern is the owner of the trademarks identified on Schedule "F" hereto (the "Patek Philippe Marks"), which are valid and registered on the Principal Register of the United States Patent and Trademark Office. The Patek Philippe Marks are used in connection with the manufacture and distribution of, among other things, high quality watches and related goods. True and correct copies of the Certificates of Registration for the Patek Philippe Marks are attached to the Complaint as Composite Exhibit "5."

54. Long before the Defendants began their infringing activities complained of herein, the Patek Philippe Marks have been used in interstate commerce to identify and distinguish Patek Philippe's high quality watches and related goods for an extended period of time and serve as symbols of Patek Philippe's quality, reputation and goodwill.

55. Further, Patek Philippe has expended substantial time, money and other resources developing, advertising and otherwise promoting the Patek Philippe Marks. Patek Philippe has spent millions of dollars to extensively advertise and promote products under the Patek Philippe Marks in magazines, newspapers, on the Internet and in other media worldwide, including the official Patek Philippe website, www.patek.com. The Patek Philippe Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

56. Patek Philippe has extensively used, advertised and promoted the Patek Philippe Marks in the United States in connection with the sale of high quality watches and related goods.

As a result of these efforts, the Patek Philippe Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as identifiers of high quality goods.

57. Patek Philippe has carefully monitored and policed the use of the Patek Philippe Marks and has never assigned or licensed the Patek Philippe Marks to any of the Defendants in this matter.

58. Genuine Patek Philippe branded goods are widely legitimately advertised and promoted by Patek Philippe, authorized distributors and unrelated third parties via the Internet. Over the course of the past several years, visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Patek Philippe's overall marketing and consumer education efforts. Thus, Patek Philippe expends significant monetary resources on Internet marketing and consumer education, including SEO strategies. Those strategies allow Patek Philippe and its authorized retailers to fairly and legitimately educate consumers about the value associated with the Patek Philippe Marks and the goods sold thereunder. Similarly, Amazon.com's, eBay.com's, iOffer.com's, Wish.com's, and Instagram.com's individual user accounts are indexed on search engines and compete directly with Patek Philippe for space in the search results.

Hublot's Rights

59. Hublot is the owner of the trademarks identified on Schedule "G" hereto (the "Hublot Mark"), which are valid and registered on the Principal Register of the United States Patent and Trademark Office. The Hublot Marks are used in connection with the manufacture and distribution of, among other things, high quality watches and related goods. True and

correct copies of the Certificates of Registration for the Hublot Marks are attached hereto as Exhibit “6.”

60. Long before the Defendants began their infringing activities complained of herein, the Hublot Marks have been used by Hublot in interstate commerce to identify and distinguish Hublot’s high quality watches and related goods for an extended period of time and serves as symbols of Hublot’s quality, reputation, and goodwill.

61. Further, Hublot and related companies have expended substantial time, money and other resources developing, advertising and otherwise promoting the Hublot Marks. Hublot and related companies have spent millions of dollars to extensively advertise and promote products under the Hublot Marks in magazines, newspapers, on the Internet and in other media worldwide, including the official Hublot website, www.hublot.com. The Hublot Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

62. Hublot and related companies have extensively used, advertised and promoted the Hublot Marks in the United States in connection with the sale of high quality watches and related goods. As a result, the Hublot Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as identifiers of high quality goods.

63. Hublot has carefully monitored and policed the use of the Hublot Marks and has never assigned or licensed the Hublot Marks to any of the Defendants in this matter.

64. Genuine goods bearing the Hublot Marks are widely legitimately advertised and promoted by Hublot and related companies, authorized distributors, and unrelated third parties via the Internet. Over the course of the past several years, visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important

to Hublot's overall marketing and consumer education efforts. Thus, Hublot and related companies expend significant monetary resources on Internet marketing and consumer education, including SEO strategies. Those strategies allow Hublot and its authorized retailers to fairly and legitimately educate consumers about the value associated with the Hublot Marks and the goods sold thereunder. Similarly, Amazon.com's, eBay.com's, iOffer.com's, Wish.com's, and Instagram.com's individual user accounts are indexed on search engines and compete directly with Hublot for space in the search results

Longines' Rights

65. Longines is the owner of the trademarks identified on Schedule "H" hereto (the "Longines Mark"), which are valid and registered on the Principal Register of the United States Patent and Trademark Office. The Longines Marks are used in connection with the manufacture and distribution of, among other things, high quality watches and related goods. True and correct copies of the Certificates of Registration for the Longines Marks are attached hereto as Exhibit "7."

66. Long before the Defendants began their infringing activities complained of herein, the Longines Marks have been used by Longines in interstate commerce to identify and distinguish Longines' high quality watches and related goods for an extended period of time and serves as symbols of Longines' quality, reputation and goodwill.

67. Further, Longines has expended substantial time, money and other resources developing, advertising and otherwise promoting the Longines Marks. Longines and related companies have spent millions of dollars to extensively advertise and promote products under the Longines Marks in magazines, newspapers, in stores, on the Internet and in other media

worldwide, including the official Longines website, www.longines.com. The Longines Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

68. Longines has extensively used, advertised and promoted the Longines Marks in the United States in connection with the sale of high quality watches and related goods. As a result, the Longines Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as identifiers of high quality goods.

69. Longines has carefully monitored and policed the use of the Longines Marks and has never assigned or licensed the Longines Marks to any of the Defendants in this matter.

70. Genuine goods bearing the Longines Marks are widely legitimately advertised and promoted by Longines and related companies, authorized distributors, and unrelated third parties via the Internet. Over the course of the past several years, visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Longines' overall marketing and consumer education efforts. Thus, Longines and related companies expend significant monetary resources on Internet marketing and consumer education, including SEO strategies. Those strategies allow Longines and its authorized retailers to fairly and legitimately educate consumers about the value associated with the Longines Marks and the goods sold thereunder. Similarly, Amazon.com's, eBay.com's, iOffer.com's, Wish.com's, and Instagram.com's individual user accounts are indexed on search engines and compete directly with Longines for space in the search results.

Movado's Rights

71. Movado is the owner of the trademarks identified on Schedule "I" hereto (the "Movado Marks"), which are valid and registered on the Principal Register of the United States Patent and Trademark Office. The Movado Marks are used in connection with the manufacture

and distribution of, among other things, high quality watches and related goods. True and correct copies of the Certificates of Registration for the Movado Marks are attached hereto as Exhibit “8.”

72. Long before the Defendants began their infringing activities complained of herein, the Movado Marks have been used Movado in interstate commerce to identify and distinguish Movado’s high quality watches and related goods for an extended period of time and serve as symbols of Movado’s quality, reputation and goodwill.

73. Further, Movado and related companies have expended substantial time, money and other resources developing, advertising and otherwise promoting the Movado Marks. Movado and related companies have spent millions of dollars to extensively advertise and promote products under the Movado Marks in magazines, newspapers, on the Internet and in other media worldwide, including the official Movado website, www.movado.com. The Movado Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

74. Movado and related companies have extensively used, advertised and promoted the Movado Marks in the United States in connection with the sale of high quality watches and related goods. As a result of these efforts, the Movado Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as identifiers of high quality goods.

75. Movado has carefully monitored and policed the use of the Movado Marks and has never assigned or licensed the Movado Marks to any of the Defendants in this matter.

76. Genuine goods bearing the Movado Marks are widely legitimately advertised and promoted by Movado and related companies, authorized distributors, and unrelated third parties via the Internet. Over the course of the several years, visibility on the Internet,

particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Movado's overall marketing and consumer education efforts. Thus, Movado and related companies expend significant monetary resources on Internet marketing and consumer education, including SEO strategies. Those strategies allow Movado and its authorized retailers to fairly and legitimately educate consumers about the value associated with the Movado Marks and the goods sold thereunder. Similarly, Amazon.com's, eBay.com's, iOffer.com's, Wish.com's, and Instagram.com's individual user accounts are indexed on search engines and compete directly with Movado for space in the search results.

Omega's Rights

77. Omega is the owner of the trademarks identified on Schedule "J" hereto (the "Omega Marks"), which are valid and registered on the Principal Register of the United States Patent and Trademark Office. The Omega Marks are used in connection with the manufacture and distribution of, among other things, high quality watches and related goods. True and correct copies of the Certificates of Registration for the Omega Marks are attached hereto as Exhibit "9."

78. Long before the Defendants began their infringing activities complained of herein, the Omega Marks have been used by Omega in interstate commerce to identify and distinguish Omega's high quality watches and related goods for an extended period of time and serves as a symbol of Omega's quality, reputation and goodwill.

79. Further, Omega has expended substantial time, money and other resources developing, advertising and otherwise promoting the Omega Mark. Omega and related companies have spent millions of dollars to extensively advertise and promote products under the Omega Marks in magazines, newspapers, on the Internet and in other media worldwide,

including the official Omega website, www.omegawatches.com. The Omega Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

80. Omega has extensively used, advertised and promoted the Omega Marks in the United States in connection with the sale of high quality watches and related goods. As a result, the Omega Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as identifiers of high quality goods.

81. Omega has carefully monitored and policed the use of the Omega Marks and has never assigned or licensed the Omega Marks to any of the Defendants in this matter.

82. Genuine goods bearing the Omega Marks are widely legitimately advertised and promoted by Omega and related companies, authorized distributors, and unrelated third parties via the Internet. Over the course of the past several years, visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Omega's overall marketing and consumer education efforts. Thus, Omega and related companies expend significant monetary resources on Internet marketing and consumer education, including SEO strategies. Those strategies allow Omega and its authorized retailers to fairly and legitimately educate consumers about the value associated with the Omega Marks and the goods sold thereunder. Similarly, Amazon.com's, eBay.com's, iOffer.com's, Wish.com's, and Instagram.com's individual user accounts are indexed on search engines and compete directly with Omega for space in the search results.

Rado's Rights

83. Rado is the owner of the trademark identified on Schedule "K" hereto (the "Rado Mark"), which is valid and registered on the Principal Register of the United States Patent and Trademark Office. The Rado Mark is used in connection with the manufacture and distribution

of, among other things, high quality watches and related goods. A true and correct copy of the Certificate of Registration for the Rado Mark is attached hereto as Exhibit “10.”

84. Long before the Defendants began their infringing activities complained of herein, the Rado Mark has been used by Rado in interstate commerce to identify and distinguish Rado’s high quality goods for an extended period of time and serves as a symbol of Rado’s quality, reputation and goodwill.

85. Further, Rado has expended substantial time, money and other resources developing, advertising and otherwise promoting the Rado Mark. Rado and related companies have spent millions of dollars to extensively advertise and promote products under the Rado Mark in magazines, newspapers, on the Internet and in other media worldwide, including the official Rado website, www.rado.com. The Rado Mark qualifies as a famous mark as that term is used in 15 U.S.C. §1125(c)(1).

86. Rado has extensively used, advertised and promoted the Rado Mark in the United States in connection with the sale of high quality watches and related goods. As a result, the Rado Mark is among the most widely recognized trademarks in the United States, and the trademark has achieved secondary meaning as an identifier of high quality goods.

87. Rado has carefully monitored and policed the use of the Rado Mark and has never assigned or licensed the Rado Mark to any of the Defendants in this matter.

88. Genuine goods bearing the Rado Mark are widely legitimately advertised and promoted by Rado and related companies, authorized distributors, and unrelated third parties via the Internet. Over the course of the past several years, visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Rado’s overall marketing and consumer education efforts. Thus, Rado and related companies

expend significant monetary resources on Internet marketing and consumer education, including SEO strategies. Those strategies allow Rado and its authorized retailers to fairly and legitimately educate consumers about the value associated with the Rado Mark and the goods sold thereunder. Similarly, Amazon.com's, eBay.com's, iOffer.com's, Wish.com's, and Instagram.com's individual user accounts are indexed on search engines and compete directly with Rado for space in the search results

Turlen's Rights

89. Turlen is the owner of the trademark identified on Schedule "L" hereto (the "Richard Mille Mark"), which is valid and registered on the Principal Register of the United States Patent and Trademark Office. The Richard Mille Mark is used in connection with the manufacture and distribution of, among other things, high quality watches. A true and correct copy of the Certificate of Registration for the Richard Mille Mark is attached hereto as Exhibit "11."

90. Long before the Defendants began their infringing activities complained of herein, the Richard Mille Mark has been used by Turlen in interstate commerce to identify and distinguish Turlen's high quality goods for an extended period of time and serves as a symbol of Turlen's quality, reputation and goodwill.

91. Further, Turlen and related companies expended substantial time, money and other resources developing, advertising and otherwise promoting the Richard Mille Mark. Turlen and related companies have spent millions of dollars to extensively advertise and promote products under the Richard Mille Mark in magazines, newspapers, on the Internet and in other media worldwide, including the official Richard Mille website, www.richardmille.com. The Richard Mille Mark qualifies as a famous mark as that term is used in 15 U.S.C. §1125(c)(1).

92. Turlen and related companies have extensively used, advertised and promoted the Richard Mille Mark in the United States in connection with the sale of high quality watches and related goods. As a result, the Richard Mille Mark is among the most widely recognized trademarks in the United States, and the trademark has achieved secondary meaning as an identifier of high quality goods.

93. Turlen has carefully monitored and policed the use of the Richard Mille Mark and has never assigned or licensed the Richard Mille Mark to any of the Defendants in this matter.

94. Genuine goods bearing the Richard Mille Mark are widely legitimately advertised and promoted by Turlen and related companies, authorized distributors, and unrelated third parties via the Internet. Over the course of the past several years, visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Turlen's overall marketing and consumer education efforts. Thus, Turlen and related companies expend significant monetary resources on Internet marketing and consumer education, including SEO strategies. Those strategies allow Turlen and its authorized retailers to fairly and legitimately educate consumers about the value associated with the Richard Mille Mark and the goods sold thereunder. Similarly, Amazon.com's, eBay.com's, iOffer.com's, Wish.com's, and Instagram.com's individual user accounts are indexed on search engines and compete directly with Turlen for space in the search results.

LVMH'S Rights

95. LVMH is the owner of the trademarks identified on Schedule "M" hereto (the "Tag Heuer Marks") which are registered on the Principal Register of the United States Patent and Trademark Office. The Tag Heuer Marks are used in connection with the manufacture and distribution of, among other things, high quality watches and related goods. True and correct

copies of the Certificates of Registration for the Tag Heuer Marks are attached hereto as Composite Exhibit “12.”

96. Long before the Defendants began their infringing activities complained of herein, the Tag Heuer Marks have been used by LVMH in interstate commerce to identify and distinguish LVMH’s high-quality goods for an extended period of time and serve as symbols of LVMH’s quality, reputation and goodwill.

97. Further, LVMH and related companies have expended substantial time, money and other resources developing, advertising and otherwise promoting the Tag Heuer Marks. LVMH and related companies have spent millions of dollars to extensively advertise and promote products under the Tag Heuer Marks in magazines, newspapers, on the Internet and in other media worldwide, including the official Tag Heuer website, www.tagheuer.com. The Tag Heuer Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

98. LVMH and related companies have extensively used, advertised and promoted the Tag Heuer Marks in the United States in connection with the sale of high quality watches and related goods. As a result, the Tag Heuer Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as identifiers of high quality goods.

99. LVMH has carefully monitored and policed the use of the Tag Heuer Marks and has never assigned or licensed the Tag Heuer Marks to any of the Defendants in this matter.

100. Genuine goods bearing the Tag Heuer Marks are widely legitimately advertised and promoted by LVMH and related companies, authorized distributors and unrelated third parties via the Internet. Over the course of the past several years, visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become

increasingly important to LVMH's overall marketing and consumer education efforts. Thus, LVMH and related companies expend significant monetary resources on Internet marketing and consumer education, including SEO strategies. Those strategies allow LVMH and its authorized retailers to fairly and legitimately educate consumers about the value associated with the Tag Heuer Marks and the goods sold thereunder. Similarly, Amazon.com's, eBay.com's, iOffer.com's, Wish.com's, and Instagram.com's individual user accounts are indexed on search engines and compete directly with LVMH for space in the search results.

Defendants' Infringing Activities

101. Upon information and belief, Defendants are promoting and advertising, distributing, selling and/or offering for sale at least watches and related goods in interstate commerce bearing counterfeit and infringing trademarks that are exact copies of one or more of the Audemars Piguet Marks, Breitling Marks, Chanel Marks, Gucci Marks, Hublot Marks, Longines Marks, Movado Marks, Omega Marks, Patek Philippe Marks, Rado Mark, Richard Mille Mark, and/or Tag Heuer Marks (the "Counterfeit Goods") via the Internet based e-commerce stores, social media accounts, and/or websites operating under at least the Seller IDs and Subject Domain Names. Specifically, upon information and belief, Defendants are using identical copies of one or more the Audemars Piguet Marks, Breitling Marks, Chanel Marks, Gucci Marks, Hublot Marks, Longines Marks, Movado Marks, Omega Marks, Patek Philippe Marks, Rado Mark, Richard Mille Mark, and/or Tag Heuer Marks (collectively, "Plaintiffs' Marks") for different quality goods. Plaintiffs have used their respective Marks t extensively and continuously before Defendants began offering counterfeit and confusingly similar imitations of Plaintiffs' goods.

102. Upon information and belief, Defendants' Counterfeit Goods are of a quality substantially different than that of Plaintiffs' respective, genuine goods. Defendants, upon information and belief, are actively using, promoting and otherwise advertising, distributing, selling and/or offering for sale substantial quantities of their Counterfeit Goods with the knowledge and intent that such goods will be mistaken for one or more of Plaintiffs' respective genuine high quality goods despite Defendants' knowledge that they are without authority to use Plaintiffs' Marks. The net effect of Defendants' actions will cause confusion of consumers at the time of initial interest, sale, and in the post-sale setting, who will believe Defendants' Counterfeit Goods are genuine goods originating from, associated with, and approved by Plaintiffs.

103. Defendants advertise their Counterfeit Goods for sale to the consuming public via an Internet e-commerce stores, social media accounts, and/or websites using at least the Seller IDs and Subject Domain Names. In so advertising these goods, Defendants improperly and unlawfully use one or more of Plaintiffs' Marks without Plaintiffs' permission.

104. As part of their overall counterfeiting and infringement scheme, Defendants are, upon information and belief, concurringly employing and benefiting from substantially similar, advertising and marketing strategies based, in large measure, upon an illegal use of counterfeits and infringements of one or more of Plaintiffs' Marks. Specifically, Defendants are, upon information and belief, using counterfeits and infringements of one or more of Plaintiffs' Marks in order to make their e-commerce stores, social media accounts, and/or websites selling illegal goods appear more relevant and attractive to consumers searching for Plaintiffs' related goods and information online and within the marketplace ecosystem. By their actions, Defendants are contributing to the creation and maintenance of illegal marketplace operating in parallel to the legitimate marketplace for Plaintiffs' respective genuine goods. Defendants are causing

individual, concurrent and indivisible harm to one or more of the Plaintiffs and the consuming public by (i) depriving Plaintiffs of their right to fairly compete for space within search engine results and reducing the visibility of Plaintiffs' respective genuine goods on the World Wide Web, (ii) causing an overall degradation of the value of the goodwill associated with Plaintiffs' Marks, and (iii) increasing Plaintiffs' overall cost to market their goods and educate consumers about their brands via the Internet.

105. Upon information and belief, Defendants are concurrently conducting and directing their counterfeiting and infringing activities toward consumers and causing harm within this district and elsewhere throughout the United States. As a result, Defendants are defrauding one or more of the Plaintiffs and the consuming public for Defendants' own benefit.

106. Upon information and belief, at all times relevant hereto, Defendants in this action had full knowledge of Plaintiffs' respective ownership of Plaintiffs' Marks, including their respective, exclusive rights to use and license such intellectual property and the goodwill associated therewith.

107. Defendants' use of one or more of Plaintiffs' Marks, including the promotion and advertisement, reproduction, distribution, sale and offering for sale of their Counterfeit Goods, is without Plaintiffs' consent or authorization.

108. Defendants are engaging in the above-described illegal counterfeiting and infringing activities knowingly and intentionally or with reckless disregard or willful blindness to Plaintiffs' rights for the purpose of trading on one or more of the Plaintiffs' respective goodwill and reputations. If Defendants' intentional counterfeiting and infringing activities are not preliminarily and permanently enjoined by this Court, Plaintiffs and the consuming public will continue to be harmed.

109. Defendants' above identified infringing activities are likely to cause confusion, deception and mistake in the minds of consumers before, during, and after the time of purchase. Moreover, Defendants' wrongful conduct is likely to create a false impression and deceive customers, the public, and the trade into believing there is a connection or association between Plaintiffs' respective genuine goods and Defendants' Counterfeit Goods, which there is not.

110. Although some Defendants may be acting independently, they may properly be deemed to be acting in concert because the combined force of their actions serves to multiply the harm caused to Plaintiffs.

111. Further, upon information and belief, Defendants' payment and financial accounts are being used by Defendants to accept, receive, and deposit profits from Defendants' trademark counterfeiting and infringing and unfairly competitive activities connected to their Seller IDs and Subject Domain Names any other alias seller identification names or domain names being used and/or controlled by them.

112. Upon information and belief, Defendants are likely to transfer or secret their assets to avoid payment of any monetary judgment awarded to Plaintiffs.

113. Plaintiffs have no adequate remedy at law.

114. Plaintiffs are suffering irreparable injury and have suffered substantial damages as a result of Defendants' unauthorized and wrongful use of one or more of Plaintiffs' Marks. If Defendants' counterfeiting and infringing and unfairly competitive activities are not preliminarily and permanently enjoined by this Court, Plaintiffs and the consuming public will continue to be harmed.

115. The harm and damages sustained by Plaintiffs have been directly and proximately caused by Defendants' wrongful reproduction, use, advertisement, promotion, offers to sell, and sale of their Counterfeit Goods.

COUNT I - TRADEMARK COUNTERFEITING AND INFRINGEMENT
PURSUANT TO § 32 OF THE LANHAM ACT (15 U.S.C. § 1114)

116. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 115 above.

117. This is an action for trademark counterfeiting and infringement against Defendants based on their use of counterfeit and confusingly similar imitations of one or more of Plaintiffs' Marks in commerce in connection with the promotion, advertisement, distribution, offering for sale, and sale of the Counterfeit Goods.

118. Defendants are promoting and otherwise advertising, selling, offering for sale, and distributing watches and related goods using counterfeits and/or infringements of one or more of Plaintiffs' Marks. Defendants are continuously infringing and inducing others to infringe one or more of Plaintiffs' Marks by using one or more of Plaintiffs' Marks to advertise, promote, offer to sell, and sell counterfeit and infringing watches and related goods.

119. Defendants' concurrent counterfeiting and infringing activities are likely to cause and actually are causing confusion, mistake, and deception among members of the trade and the general consuming public as to the origin and quality of Defendants' Counterfeit Goods.

120. Defendants' unlawful actions have caused and are continuing to cause unquantifiable damages to Plaintiffs and are unjustly enriching Defendants with profits at Plaintiffs' expense.

121. Defendants' above-described illegal actions constitute counterfeiting and infringement of one or more of Plaintiffs' Marks in violation of Plaintiffs' respective rights under § 32 of the Lanham Act, 15 U.S.C. § 1114.

122. Plaintiffs have each suffered and will continue to suffer irreparable injury and damages due to Defendants' above described activities if Defendants are not preliminarily and permanently enjoined. Additionally, Defendants will continue to wrongfully profit from their illegal activities.

COUNT II - FALSE DESIGNATION OF ORIGIN
PURSUANT TO § 43(a) OF THE LANHAM ACT (15 U.S.C. § 1125(a))

123. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 115 above.

124. Defendants' Counterfeit Goods bearing, offered for sale, and sold using copies of one or more of Plaintiffs' Marks have been widely advertised and offered for sale throughout the United States via at least one Internet websites and marketplace or social media platforms.

125. Defendants' Counterfeit Goods bearing, offered for sale and sold using copies of one or more of Plaintiffs' Marks are virtually identical in appearance to Plaintiffs' respective, genuine goods. However, Defendants' Counterfeit Goods are different and likely inferior in quality. Accordingly, Defendants' activities are likely to cause confusion in the trade and among the general public as to at least the origin or sponsorship of their Counterfeit Goods.

126. Defendants, upon information and belief, have used in connection with their advertisement, offer for sale, and sale of the Counterfeit Goods, false designations of origin and false descriptions and representations, including words or other symbols and trade dress which tend to falsely describe or represent such goods and have caused such goods to enter into

commerce with full knowledge of the falsity of such designations of origin and such descriptions and representations, all to Plaintiffs' detriment.

127. Defendants have authorized infringing uses of one or more of Plaintiffs' Marks in Defendants' advertisement and promotion of their counterfeit and infringing branded goods. Some Defendants have also misrepresented to members of the consuming public that the Counterfeit Goods being advertised and sold by them are genuine, non-infringing goods.

128. Additionally, Defendants are using counterfeits and infringements of one or more of Plaintiffs' Marks in order to unfairly compete with Plaintiffs and others for space within search engine results, thereby jointly depriving Plaintiffs of a valuable marketing and educational tool which would otherwise be available to Plaintiffs and reducing the visibility of Plaintiffs' genuine goods on the World Wide Web.

129. Defendants' above-described actions are in violation of Section 43(a) of the Lanham Act, 15 U.S.C. §1125(a).

130. Plaintiffs have each sustained indivisible injury and damage caused by Defendants' concurrent conduct. Absent an entry of an injunction by this Court, Defendants will continue to wrongfully reap profits and each Plaintiff will continue to suffer irreparable injury to their goodwill and business reputations, as well as monetary damages.

COUNT III - COMMON LAW UNFAIR COMPETITION

131. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 115 above.

132. This is an action against Defendants based on their promotion, advertisement, distribution, sale, and/or offering for sale of goods bearing marks that are virtually identical, both

visually and phonetically, to one or more of Plaintiffs' Marks in violation of Florida's common law of unfair competition.

133. Specifically, Defendants are promoting and otherwise advertising, selling, offering for sale, and distributing watches and related goods bearing counterfeits and infringements of one or more of Plaintiffs' Marks. Defendants are also using counterfeits and infringements of one or more of Plaintiffs' Marks to unfairly compete with Plaintiffs and others for (1) space in search engine results across an array of search terms and (2) visibility on the World Wide Web.

134. Defendants' infringing activities are likely to cause and actually are causing confusion, mistake, and deception among members of the trade and the general consuming public as to the origin and quality of Defendants' products by their use of one or more of Plaintiffs' Marks.

135. Plaintiffs have no adequate remedy at law and are suffering irreparable injury as a result of Defendants' actions.

COUNT IV - COMMON LAW TRADEMARK INFRINGEMENT

136. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 115 above.

137. This is an action for common law trademark infringement against Defendants based on their promotion, advertisement, offering for sale, and/or sale of their Counterfeit Goods bearing one or more of Plaintiffs' Marks. Plaintiffs are the owners of all common law rights in and to Plaintiffs' Marks.

138. Specifically, Defendants, upon information and belief, are promoting and otherwise advertising, distributing, offering for sale, and selling goods bearing infringements of one or more of Plaintiffs' Marks.

139. Defendants' infringing activities are likely to cause and actually are causing confusion, mistake and deception among members of the trade and the general consuming public as to the origin and quality of Defendants' Counterfeit Goods bearing one or more of Plaintiffs' Marks.

140. Plaintiffs have no adequate remedy at law and are suffering damages and irreparable injury as a result of Defendants' actions.

PRAYER FOR RELIEF

141. WHEREFORE, Plaintiffs demand judgment on all Counts of this Complaint and an award of equitable relief and monetary relief against Defendants as follows:

a. Entry of a temporary restraining order, as well as preliminary and permanent injunctions pursuant to 15 U.S.C. § 1116 and Federal Rule of Civil Procedure 65 enjoining Defendants, their agents, representatives, servants, employees, and all those acting in concert or participation therewith, from manufacturing or causing to be manufactured, importing, advertising or promoting, distributing, selling or offering to sell their Counterfeit Goods; from infringing, counterfeiting, or diluting Plaintiffs' Marks; from using Plaintiffs' Marks, or any mark or trade dress similar thereto, in connection with the sale of any unauthorized goods; from using any logo, trade name or trademark or trade design that may be calculated to falsely advertise the services or goods of Defendants as being sponsored by, authorized by, endorsed by, or in any way associated with Plaintiffs; from falsely representing themselves as being connected with Plaintiffs, through sponsorship or association, or engaging in any act that is likely to falsely

cause members of the trade and/or of the purchasing public to believe any goods or services of Defendants are in any way endorsed by, approved by, and/or associated with Plaintiffs; from using any reproduction, counterfeit, infringement, copy, or colorable imitation of Plaintiffs' Marks in connection with the publicity, promotion, sale, or advertising of any goods sold by Defendants, including, without limitation, watches; from affixing, applying, annexing or using in connection with the sale of any goods, a false description or representation, including words or other symbols tending to falsely describe or represent Defendants' goods as being those of Plaintiffs, or in any way endorsed by Plaintiffs and from offering such goods in commerce; from engaging in search engine optimization strategies using colorable imitations of Plaintiffs' respective names or trademarks; and from otherwise unfairly competing with Plaintiffs.

b. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act that, upon Plaintiffs' request, the top level domain (TLD) Registry for the each of the Subject Domain Names or their administrators, including backend registry operators or administrators, place the Subject Domain Names on Registry Hold status for the remainder of the registration period for any such domain name, thus removing them from the TLD zone files which link the Subject Domain Names to the IP addresses where the associated websites are hosted.

c. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act and the Court's inherent authority, canceling for the life of the current registration or, at Plaintiffs' election, transferring the Subject Domain Names and any other domain names used by Defendants to engage in their counterfeiting and infringement of Plaintiffs' Marks at issue to Plaintiffs' control so they may no longer be used for illegal purposes.

d. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, requiring the Seller IDs, and any other user names, alias seller identification names being used

and/or controlled by Defendants to engage in the business of marketing, offering to sell, and/or selling goods bearing counterfeits and infringements of Plaintiffs' Marks be disabled by each Defendant and the applicable governing Internet marketplace website and social media website operators and/or administrators who are provided with notice of the injunction, including Amazon.com, Inc, eBay.com, Inc., iOffer, Inc., ContextLogic, Inc., which operates the Wish.com platform, and Instagram, LLC.

e. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, that, upon Plaintiffs' request, any messaging service and any Internet marketplace website and social media website operators and/or administrators that are provided with notice of the injunction, including but not limited to Amazon.com, eBay.com, Inc., iOffer, Inc., ContextLogic, Inc., which operates the Wish.com platform, and Instagram, LLC, identify any e-mail address known to be associated with Defendants' respective Seller ID, and cease facilitating access to any or all e-commerce stores or user accounts through which Defendants engage in the promotion, offering for sale, and/or sale of goods bearing counterfeits and/or infringements of Plaintiffs' Marks.

f. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, that, upon Plaintiffs' request, any Internet marketplace website operators and/or administrators who are provided with notice of the injunction, including but not limited to Amazon.com, Inc, eBay.com, Inc., iOffer, Inc., ContextLogic, Inc., which operates the Wish.com platform, and Instagram, LLC, permanently remove from the multiple platforms, which include, *inter alia*, a Direct platform, Group platform, Seller Product Management platform, Vendor Product Management platform, and Brand Registry platform, any and all listings and associated images of goods bearing counterfeits and/or infringements of Plaintiffs' Marks via the e-commerce stores operating under the Seller IDs, including but not limited to the listings and associated

images identified by the “parent” and/or “child” Amazon Standard Identification Numbers (“ASIN”) on Schedule “O” annexed hereto, and upon Plaintiffs’ request, any other listings and images of goods bearing counterfeits and/or infringements of Plaintiffs’ Marks associated with any “parent” and “child” ASIN linked to the same sellers or linked to any other alias seller identification name being used and/or controlled by Defendants to promote, offer for sale and/or sell goods bearing counterfeits and/or infringements of Plaintiffs’ Marks, and any other listings and images of goods bearing counterfeits and/or infringements of Plaintiffs’ Marks associated with the same seller identity or user name or linked to any other alias seller identification name or user name being used and/or controlled by Defendants to promote, offer for sale and/or sell goods bearing counterfeits and/or infringements of one more of Plaintiffs’ Marks.

g. Entry of an Order requiring, upon Plaintiffs’ request, Defendants to request in writing permanent termination of any messaging services, Seller IDs, user names, and social media accounts they own, operate, or control on any messaging service and social media platform specifically including but not limited to, Instagram.com;

h. Entry of an order requiring Defendants to account to and pay Plaintiffs for all profits and damages resulting from Defendants’ trademark counterfeiting and infringing and unfairly competitive activities and that the award to Plaintiffs be trebled, as provided for under 15 U.S.C. §1117, or, at Plaintiffs’ election with respect to Count I, that Plaintiffs be awarded statutory damages from each Defendant in the amount of two million dollars (\$2,000,000.00) per each counterfeit trademark used and product sold, as provided by 15 U.S.C. §1117(c)(2) of the Lanham Act.

i. Entry of an award pursuant to 15 U.S.C. § 1117 (a) and (b) of Plaintiffs’ costs and reasonable attorneys’ fees and investigative fees associated with bringing this action.

j. Entry of an order that, upon Plaintiffs' request, Defendants and any financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to, Amazon Payments, Inc., PayPal, Inc., ContextLogic, Inc., Wish.com, and their related companies and affiliates, identify and restrain all funds, up to and including the total amount of judgment, in all financial accounts and/or sub-accounts used in connection with the Seller IDs and Subject Domain Names, or other alias user names, seller identification or e-commerce store names, or domain names used by Defendants presently or in the future, as well as any other related accounts of the same customer(s) and any other accounts which transfer funds into the same financial institution account(s), to be surrendered to Plaintiffs in partial satisfaction of the monetary judgment entered herein.

k. Entry of an award of pre-judgment interest on the judgment amount.

l. Entry of an order for any further relief as the Court may deem just and proper.

DATED: November 16, 2018.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **s:/Stephen M. Gaffigan/**

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Attorneys for Plaintiffs

SCHEDULE “A”
DEFENDANTS BY NUMBER AND SELLER ID AND SUBJECT DOMAIN NAME



Defendant Number	Defendant / Seller ID and Subject Domain Name
1	Bluelans
2	chenglian
3	Crazy Store
4	enghuaniu
5	Ethereal
6	evergrand
7	Fashion&Pretty
8	fleeceboo
9	guomiaomiao1314
10	HeRun Industrial Co., Ltd., Zhejiang
11	jianglina
12	jiangqiong store
13	jingjianstore
14	menghongyan
15	mingxingbiaoyeyouxiangongsi
16	month cloud
17	roadtoallways
18	shenzhenshiqingmeikejiyouxiangongsi
19	shixin888999666
20	silver chinese
21	topbirdy
22	weiye
23	xinlingzhongbiao
24	Yicheng Tesco
25	God Bless US & My Time Zone Store
26	My Time Zone
27	watchestime
28	best4choose
29	corpor2008
30	gudaoxiagu-0
31	joftbenn7
32	kher6424
33	miki2016
34	springenn
35	fafafa8886
36	kisscome0411

37	leehomwang
38	paycay
39	vivaq8
40	wristwatcheshere
41	zhimakaihua2015
42	bagaholics20000
43	bestwatches88
44	hb_luxury_bags
45	hype_replug
46	luxury_bag_shoes_shop
47	luxurybrand.factory1314
48	luxurygirl9328
49	mshop8_tel_89516445438
50	rolexfulldiamantes
51	rolexwatch2018
52	watch_happens
53	watchespages
54	phan.official9
54	phanofficial.com
55	xfashion_boutique222
55	kingluxury222.com
56	classemporium.com
57	swissreplicawatchesinindia.com

SCHEDULE "B"
AUDEMARS PIGUET'S FEDERALLY REGISTERED TRADEMARK

Trademark	Registration Number	Registration Date	Class / Goods
AUDEMARS PIGUET	913,296	June 8, 1971	IC 014. Watch straps, and jewelry.
Royal Oak	965,112	July 31, 1973	IC 014. Watches and clocks and parts thereof
AUDEMARS PIGUET	1,591,934	April 17, 1990	IC 014 - watches, clocks, stop watches, time recorders, chronometers, chronographs, watch movements, and parts of all the foregoing.
AP AUDEMARS PIGUET	2,873,707	August 17, 2004	IC 014. namely, watch cases, watch bands, watches, wristwatches
ROYAL OAK	2,885,834	September 21, 2004	IC 014. watch cases, watch bands, watches, wristwatches
	3,480,826	May 20, 2008	IC 014. Cuff links, pendants; jewelry, bijouterie, timepieces, namely, watches, watch making materials, namely, alarm clocks, chronographs for use as timepieces and watches, dials for clock-and-watch making, boxes, caskets and cases for timepieces and jewelry
AP	3,696,017	October 13, 2009	IC 014. timepieces, namely, watches, wristwatches, clocks, chronographs for use as watches, watch straps; clock dials, watch cases
AP	4,683,263	February 10, 2015	IC 014. Precious metals and alloys thereof and goods made of precious metals or coated therewith, namely, cufflinks, pendants, watches, alarm clocks, chronographs for use as timepieces and watches, dials for clock-and-watch making, boxes, caskets and cases for timepieces and jewelry, key rings of precious metal; jewelry; precious stones; timepieces and chronometric instruments






SCHEDULE "C"
BREITLING'S FEDERALLY REGISTERED TRADEMARKS

Trademark	Registration Number	Registration Date	Class / Goods
 BREITLING	2,352,162	May 23, 2000	IC 014. horological instruments and chronometrical instruments, namely, watches, wrist-watches, straps for wrist-watches and watchcases, travel clocks, clocks, chronographs, chronometers
BREITLING	2,964,474	July 5, 2005	IC 014 - horological instruments and chronometrical instruments, namely, watches, wrist-watches straps for wrist-watches, watchcases, clocks, chronographs, chronometers, and parts thereof. IC 025 - caps, scarves t-shirts, shirts, sweatshirts, polo shirts, jackets, pilot jackets, bomber's jackets, parka jackets.
	3,377,049	February 5, 2008	IC 014. timepieces and chronometric instruments, namely, watches, watchbands, chronometers, chronographs for use as watches

SCHEDULE “D”
CHANEL’S FEDERALLY REGISTERED TRADEMARKS

Trademark	Registration Number	Registration Date	Class / Goods
CHANEL	955,074	March 13, 1973	IC 014. Watches
CHANEL	1571787	September 26, 1989	IC 014. Watches
J12	2,559,772	April 9, 2002	IC 014. Timepieces; namely, watches, and parts thereof
CHANEL	3,133,139	August 22, 2006	IC 014. Jewelry and Watches


SCHEDULE “E”
GUCCI’S FEDERALLY REGISTERED TRADEMARKS

Trademark	Registration Number	Registration Date	Class / Goods
GUCCI	959,338	May 22, 1973	IC 014 – Watches.
	1,123,224	July 31, 1979	IC 014. Goods made or coated with precious metal-namely, watches
	1,464,522	November 10, 1987	IC 014. Watches, cufflinks, made or coated with precious metal, bracelets, pendants, earrings, made or coated with precious metals, rings, and necklaces
	1,520,796	January 17, 1989	IC 014. Watches.
	3,378,755	February 5, 2008	IC 009. Eyeglass frames and sunglasses
	3,470,140	July 22, 2008	IC 006 - metal key rings. IC 014 - Jewelry, namely, earrings, pendants, rings, necklaces and watches; key rings of precious metal. IC 025 - Apparel, namely, neckties, scarves, shirts, sweaters, coats, hats, socks, dresses, bathing suits, and gloves




SCHEDULE "F"
HENRI STERN'S FEDERALLY REGISTERED TRADEMARK

Trademark	Registration Number	Registration Date	Class / Goods
PATEK PHILIPPE	520,291	January 24, 1950	IC 014 - watches.
PATEK PHILIPPE	764,655	February 11, 1964	IC 014. Leather Straps for Wrist Watches



SCHEDULE “G”
HUBLOT’S FEDERALLY REGISTERED TRADEMARK

Trademark	Registration Number	Registration Date	Class / Goods
 HUBLOT	1,222,529	January 4, 1983	IC 014. Watches and Clocks and Parts Therefor; Chronometers; Chronographs; Costume Jewelry and Jewelry Made Wholly or in Part of Precious Metals
BIG BANG	3,149,003	September 26, 2006	IC 014: Timepieces and chronometric instruments and parts thereof namely watch cases, watch bands, watches used as chronographs, watches used as chronoscopes, chronometers, watches, wristwatches, dress watches, diving watches, movements for clocks and watches, movements for watches


SCHEDULE “H”
LONGINES’ FEDERALLY REGISTERED TRADEMARK

Trademark	Registration Number	Registration Date	Class / Goods
<i>LONGINES</i>	065,109	September 10, 1907	IC 014. Watches, parts of watches, and watchcases
	668,956	October 28, 1958	IC 014. Watches and watch movements and parts thereof
	1,328,417	April 2, 1985	IC 014. Clocks, Watches and Parts Therefor, and Jewelry and Costume Jewelry
LONGINES 	1,377,147	January 7, 1986	IC 014. Watches and parts therefor, and jewelry and costume jewelry.

SCHEDULE "T"
MOVADO'S FEDERALLY REGISTERED TRADEMARK

Trademark	Registration Number	Registration Date	Class / Goods
	1,381,257	February 4, 1986	IC 014. Watches
	1,398,457	June 24, 1986	IC 014. Watches

SCHEDULE “J”
OMEGA’S FEDERALLY REGISTERED TRADEMARK

Trademark	Registration Number	Registration Date	Class / Goods
SEAMASTER	556,602	March 25, 1952	IC 014. Watches, watch parts and watch movements.
OMEGA	566,370	November 4, 1952	IC 014. Watches and parts thereof.
	578,041	July 28, 1953	IC 014. watches (including pocket watches, wrist watches with or without straps, bands or bracelets, pendant watches, calendar watches, and stopwatches) either stem-wind or automatic; clocks; chronometers, chronographs, and parts for all of the foregoing
SPEEDMASTER	672,487	January 13, 1959	IC 014. Watches and clocks


SCHEDULE “K”
RADO’S FEDERALLY REGISTERED TRADEMARK

Trademark	Registration Number	Registration Date	Class / Goods
RADO	1,729,207	November 3, 1992	IC 014 - watches and parts thereof

SCHEDULE “L”
TURLEN’S FEDERALLY REGISTERED TRADEMARK

Trademark	Registration Number	Registration Date	Class / Goods
RICHARD MILLE	3,117,381	July 18, 2006	IC 014. horological and chronometric instruments


SCHEDULE "M"
LVMH'S FEDERALLY REGISTERED TRADEMARK

Trademark	Registration Number	Registration Date	Class / Goods
FORMULA 1	1,435,463	April 7, 1987	IC 014. Mechanical watches, and their constituent parts.
	1,471,988	January 12, 1988	IC 009. Time measuring instruments, namely, electronic stop watches, remote control mini-printer timers, electronic and manual timers, photocell timers, starting gate timers, telephone liaison timers, impulse distributor timers, electronic pistol starting timers, manual contactor timers. IC 014. Clocks, watches and parts thereof. IC 025. Sportswear, namely, parkas.
TAG HEUER	2,281,436	September 28, 1999	IC 014. Clocks, watches and parts thereof.
TAG HEUER LINK	2407950	November 28, 2000	IC 014. Horological instruments and chronometrical instruments, namely watches, wrist-watches, straps for wrist-watches and watch cases, travel clocks, clocks, chronographs for use as watches, chronometers-- powder compacts and jewel cases in precious metals or coated with precious metals; jewelry made of precious metals or coated with precious metals
AQUARACER	3046300	January 17, 2006	IC 014. Jewelry, precious stones; timepieces and chronometric instruments, namely watches, watchbands, chronometers, chronographs for use as watches, clocks

HEUER	3569070	February 3, 2009	"IC 009. optical goods, namely, spectacles, sunglasses, spectacle frames, spectacles cases; time measuring apparatus and instruments, namely, electronic stop watches, remote control miniprinter timers, electronic and manual timers, photocell timers, starting gate timers, telephone liaison timers, impulse distributor timers, electronic pistol starting timers, manual contactor timers, calculators incorporating watch functions, electric time control switches and their parts; telephones, mobile phones, cameras, digital audio players and handheld mobile digital electronic devices for the sending and receiving of telephone calls, for use as a digital audio player, and for use as a camera; accessories for telephones, mobile phones and handheld mobile digital electronic devices, namely, cases, batteries, chargers, loudspeakers, microphones, stands, rests and frames.
TAG	4868760	December 15, 2015	IC 014. Timepieces and chronometric instruments
TAG HEUER	5,202,283	May 16, 2017	IC 003. soaps; perfumes; cosmetics, creams, and lotions for the body and hair; shampoos; makeup and makeup removers; lipstick; beauty masks; shaving preparations; after-shave lotions and balms; non-medicated toiletries; deodorants for personal use; leather polishes; preservative creams for leather IC 009. apparatus for recording, transmission, reproduction, or processing of sound or images; electronic timers and timing sensors; calculating machines; equipment for data processing; timing dials and timing sensors; electronic timers; chronographs for use as specialized time recording apparatus; game software; computer operating software for smartwatches and mobile electronic devices; computer software for sending and receiving electronic mail, text messages, data, photographs, and videos; computer software for accessing, browsing, and searching online databases; computer software

			<p>for sensing, monitoring, recording, displaying, measuring, and transmitting global positioning, direction, distance, altitude, speed, navigational information, weather information, temperature, physical activity level, heart rate, pulse rate, blood pressure, calories burned, steps taken, and biometric data; computer software for tracking and managing information regarding health, fitness, and wellness programs; computer peripherals; telephones; tablet computers; MP3 players; smartwatches; wearable computers; smartphones featuring a watch; accessories for computers, telephones, tablet computers, MP3 players, and smartwatches, namely, displays, monitors, protective covers, carrying cases, stands, batteries, battery chargers, headphones, speakers, headsets, microphones, car audio adapters, remote controls, connection cables, power adapters, docking stations, and adapter plugs; spectacles; sunglasses; optical lenses and glasses; spectacle cases; memory cards and integrated circuit cards; downloadable electronic publications in the nature of books, newsletters, catalogs, and brochures in the fields of watches, chronometric instruments, jewelry, apparel, luggage, leather accessories, personal care products, luxury goods, sports, and fashion; electronic sensors, monitors, and displays used to provide and display official time at sporting, cultural, wellness, entertainment, and educational events; electronic connected bracelets and connected cuffs for tracking the movement of people that also have a function of transmitting, and/or receiving data to and/or from personal digital assistants, tablets, smart phones and personal computers through internet websites and other computer and electronic communication networks.</p> <p>IC 014. jewelry; precious stones; horological instruments, namely, watches, wristwatches, and constitutive parts therefor; alarm clocks, clocks and other chronometric instruments, chronometers, chronographs as watches, chronometric apparatus for sports timing,</p>
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			<p>chronometric apparatus for measuring and marking the time; watch bands, watch chains, watch springs, watch dials or watch glasses, watch winders, watch cases being parts of watches, cases and boxes adapted for holding watches; precious metals and their alloys; jewelry cases; boxes of precious metal; key rings, trinkets or fobs of precious metals; cuff links; bracelets; rings; medals; watches that also have a function of transmitting and/or receiving data to and/or from personal digital assistants, tablets, smart phones and personal computers through internet websites and other computer and electronic communication networks; watches containing an electronic game function, watches incorporating a telecommunication function; leather boxes adapted for holding watches</p> <p>IC 016. passport holders and cases</p> <p>IC 018. goods of leather and imitation leather, namely, leather or leatherboard boxes, leather or imitation leather envelopes, travel chests, bags, garment bags for travel, trunks, suitcases, luggage, carrying boxes intended for toiletry articles sold empty, rucksacks, handbags, beach bags, reusable shopping bags, shoulder bags, carrying cases, attaché cases, briefcases, school satchels, under-arm bags, wallets, purses, money pouches, key cases, credit card holders; umbrellas, parasols, sun umbrellas, walking sticks</p> <p>IC 025. clothing, namely, underwear, sweaters, shirts, bodices, corsets, suits, vests, raincoats, skirts, coats, trousers, jumpers, dresses, jackets, shawls, sashes for wear, scarves, neckties, pocket squares, suspenders, gloves, belts, stockings, tights, socks, singlets, bathing suits and bathrobes; footwear; headwear</p> <p>IC 035. retail store services and online retail store services featuring cosmetics, hair care and skin care preparations, perfumes, shaving preparations, toiletries, smartwatches, computers, tablet computers, computer hardware, computer software, computer</p>
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			peripherals, telephones, mobile electronic devices, health, fitness and exercise sensors, monitors and displays, computer gaming machines and electronic games, and accessories for computers, telephones, and mobile electronic devices, sunglasses, spectacles, optical lenses and glasses, spectacle cases, jewelry and precious stones, watches, clocks, chronometric instruments, accessories for watches and chronometric instruments, leather goods, leatherware, bags, briefcases, luggage, wallets, purses, umbrellas, clothing, footwear, and headgear; public relations; advertising services for luxury products, namely, cosmetics, perfumes, optical goods, telephones, wearable electronic devices, jewelry, horological products, watches, connected watches, smartwatches, luggage, leatherware, bags, clothing, clothing accessories; business management and organization consultancy in the field of luxury goods
	5,314,173	August 8, 2017	<p>IC 003. soaps; perfumes; cosmetics, creams, and lotions for the body and hair; shampoos; makeup and makeup removers; lipstick; beauty masks; shaving preparations; after-shave lotions and balms; non-medicated toiletries; deodorants for personal use; leather polishes; preservative creams for leather.</p> <p>IC 009. apparatus for recording, transmission, reproduction, or processing of sound or images; electronic timers and timing sensors; calculating machines; equipment for data processing; timing dials and timing sensors; electronic timers; chronographs for use as specialized time recording apparatus; game software; computer operating software for smartwatches and mobile electronic devices; computer software for sending and receiving electronic mail, text messages, data, photographs, and videos; computer software for accessing, browsing, and searching online databases; computer software for sensing, monitoring, recording, displaying, measuring, and transmitting global positioning, direction, distance, altitude, speed, navigational information, weather information, temperature,</p>

			<p>physical activity level, heart rate, pulse rate, blood pressure, calories burned, steps taken, and biometric data; computer software for tracking and managing information regarding health, fitness, and wellness programs; computer peripherals; telephones; tablet computers; MP3 players; smartwatches; wearable computers; smartphones featuring a watch; accessories for computers, telephones, tablet computers, MP3 players, and smartwatches, namely, displays, monitors, protective covers, carrying cases, stands, batteries, battery chargers, headphones, speakers, headsets, microphones, car audio adapters, remote controls, connection cables, power adapters, docking stations, and adapter plugs; spectacles; sunglasses; optical lenses and glasses; spectacle cases; memory cards and integrated circuit cards; downloadable electronic publications in the nature of books, newsletters, catalogs, and brochures in the fields of watches, chronometric instruments, jewelry, apparel, luggage, leather accessories, personal care products, luxury goods, sports, and fashion; electronic sensors, monitors, and displays used to provide and display official time at sporting, cultural, wellness, entertainment, and educational events; electronic connected bracelets and connected cuffs for tracking the movement of people that also have a function of transmitting, and/or receiving data to and/or from personal digital assistants, tablets, smart phones and personal computers through internet websites and other computer and electronic communication networks.</p> <p>IC 010. health monitoring devices consisting of health, fitness and exercise sensors, heart rate monitors and sensors, pulse rate monitors and sensors, blood pressure monitors and sensors, respiratory monitors and sensors, thermometers, pedometers and monitors and displays for medical use to be worn during exercise and sporting activities.</p> <p>IC 014. jewelry; precious stones; horological instruments, namely, watches, wristwatches, and constitutive parts therefor; alarm clocks,</p>
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			<p>clocks and other chronometric instruments, chronometers, chronographs as watches, chronometric apparatus for sports timing, chronometric apparatus for measuring and marking the time; watch bands, watch chains, watch springs, watch dials or watch glasses, watch winders, watch cases being parts of watches, cases and boxes adapted for holding watches; precious metals and their alloys; jewelry cases; boxes of precious metal; key rings trinkets or fobs of precious metals; cuff links; bracelets; rings; medals; watches that also have a function of transmitting and/or receiving data to and/or from personal digital assistants, tablets, smart phones and personal computers through internet websites and other computer and electronic communication networks; watches containing an electronic game function, watches incorporating a telecommunication function; leather boxes adapted for holding watches.</p> <p>IC 028. computer gaming machines; electronic games other than those adapted for use with television receivers only.</p> <p>IC 035. retail store services and online retail store services featuring cosmetics, hair care and skin care preparations, perfumes, shaving preparations, toiletries, smartwatches, computers, tablet computers, computer hardware, computer software, computer peripherals, telephones, mobile electronic devices, health, fitness and exercise sensors, monitors and displays, computer gaming machines and electronic games, and accessories for computers, telephones, and mobile electronic devices, sunglasses, spectacles, optical lenses and glasses, spectacle cases, jewelry and precious stones, watches, clocks, chronometric instruments, accessories for watches and chronometric instruments, leather goods, leatherware, bags, briefcases, luggage, wallets, purses, umbrellas, clothing, footwear, and headgear; public relations; advertising services for luxury products, namely, cosmetics, perfumes, optical goods, telephones, wearable electronic devices, jewelry, horological</p>
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			<p>products, watches, connected watches, smartwatches, luggage, leatherware, bags, clothing, clothing accessories; business management and organization consultancy in the field of luxury goods.</p> <p>IC 037. repair, overhaul repair, maintenance and polishing of portable/wearable electronic and/or telecommunication devices; repair, overhaul repair, maintenance and polishing of timepieces.</p> <p>IC 038. telecommunications services, namely, personal communication services, ISDN services, telecommunications access services, data transmission and reception services via telecommunication means, and telecommunications gateway services; telecommunication information; communications by computer terminals or by fiber-optic networks; electronic bulletin board services.</p> <p>IC 041. providing information about sporting and cultural activities, fitness, exercise, sports, entertainment, education and training exercise; timing of sports events.</p> <p>IC 044. health assessment services; providing medical information in the fields of health, fitness, and exercise</p>
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SCHEDULE “O”
AMAZON STANDARD IDENTIFICATION NUMBERS (“ASIN”) BY DEFENDANT

Defendant Number	Defendant / Seller ID	Amazon Seller ID No.	Infringing Product ASIN
25	God Bless US & My Time Zone Store	AIAR2SKYSX2U	B07BNNL7H7
26	My Time Zone	A1P3J9KLS4YC5O	B07BLXHJFZ
27	watchestime	AK51NY5E75GFI	B07CVDXZZY