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Attorneys for Plaintiff, CHANEL, INC.

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

CHANEL, INC.,

Plaintiff,

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE "A" and
DOES 1-1000,

Defendants.

Case No. 2:11-cv-01508-KJD-PAL

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S *EX PARTE*
APPLICATION FOR ENTRY OF
TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

THIS CAUSE is before the Court on Plaintiff's *Ex Parte* Application For Entry of a Temporary Restraining Order and Preliminary Injunction (the "Application for TRO"). Plaintiff, Chanel, Inc. ("Plaintiff" or "Chanel"), moves, on an *ex parte* basis, for entry of a temporary restraining order, and, upon expiration of the temporary restraining order, a preliminary injunction

1 against Defendants, the Partnerships and Unincorporated Associations identified on Schedule “A”
2 attached hereto (the “Defendants”), pursuant to 15 U.S.C. § 1116 and Fed. R. Civ. P. 65 for alleged
3 violations of the Lanham Act, 15 U.S.C. §§ 1114, and 1125(a) and (d).

4 For reasons set forth herein, Plaintiff’s Application for TRO is GRANTED.

5 **I. Factual Background**

6 The Court bases this Temporary Restraining Order on the following facts from Plaintiff’s
7 Complaint, Application for TRO, and supporting evidentiary submissions.





8 Chanel is a corporation duly organized under the laws of the State of New York with its
9 principal place of business in the United States located at Nine West 57th Street, New York, New
10 York 10019. (Compl. ¶ 3.) Chanel operates boutiques throughout the world, including within this
11 Judicial District. See id. Chanel is, in part, engaged in the business of manufacturing and distributing
12 throughout the world, including within this Judicial District, a variety of high quality luxury goods.
13 (Declaration of Adrienne Hahn Sisbarro in Support of Plaintiff’s *Ex Parte* Application for TRO
14 [“Hahn Decl.”] ¶ 5.)

15 Chanel is, and at all times relevant hereto has been, the owner of all rights in and to the
16 following trademarks:





17


18 Trademark	Registration Number	Registration Date	Class(es)/Goods
19 CHANEL	0,612,169	September 13, 1955	IC 014 - Necklaces
20 CHANEL	0,626,035	May 1, 1956	IC 018 – Women’s Handbags
21 CHANEL	0,902,190	November 10, 1970	IC 014 - Bracelets, Pins, and Earrings
22 CHANEL	0,906,262	January 19, 1971	IC 025 - Coats, Suits, Blouses, and Scarves

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1	CHANEL	0,915,139	June 15, 1971	IC 025 - Women's Shoes
2				
3	CHANEL	0,955,074	March 13, 1973	IC 014 – Watches
4				
5		1,241,264	June 7, 1983	IC 025 - Suits, Jackets, Skirts, Dresses, Pants, Blouses, Tunics, Sweaters, Cardigans, Tee-Shirts, [Capes,] Coats, Raincoats, [Jackets Made of Feathers, Shawls,] Scarves, Shoes and Boots
6				
7				
8	CHANEL	1,241,265	June 7, 1983	IC 025 - Suits, Jackets, Skirts, Dresses, Pants, Blouses, Tunics, Sweaters, Cardigans, [Tee-Shirts, Capes,] Coats, Raincoats, [Jackets Made of Feathers, Shawls,] Scarves, Shoes and Boots
9				
10				
11				
12		1,271,876	March 27, 1984	IC 025 - Clothing-Namely, Coats, Dresses, Blouses, Raincoats, Suits, Skirts, Cardigans, Sweaters, Pants, Jackets, Blazers, [Shawls, Hats] and Shoes
13				
14				
15		1,314,511	January 15, 1985	IC 018 - Leather Goods-Namely, Handbags, [Wallets, Travel Bags, Luggage, Credit Card And Business Card Cases, Make-Up Bags and Vanity Cases Sold Empty, Briefcase- Type Portfolios; Attache Cases, Change Purses, Suitcases, Tote Bags, Garment Bags and Travellers' Shoe Bags]
16				
17				
18				
19				
20	CHANEL 	1,329,750	April 9, 1985	IC 025 - Blouses, Skirts, Sweaters, Cardigans, Dresses [Shawls, Scarves, Hats, Collars, Cuffs and Neckties]
21				
22				
23	CHANEL	1,347,677	July 9, 1985	IC 018 - Leather Goods-namely, Handbags [Wallets, Travel Bags, Luggage, Business and Credit Card Cases, Brief Case Type Portfolios, Attache Cases, Change Purses, Suitcases, Tote Bags, Make-Up Bags and Vanity Cases Sold Empty, Garment Bags for Travel and Travellers' Shoe Bags]
24				
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1			IC 006 - Keychains
2			IC 014 - Costume Jewelry
3		1,501,898	August 30, 1988
4			IC 016 - Gift Wrapping Paper
5			IC 025 -Blouses, Shoes, Belts, Scarves, Jackets, Men's Ties
6			IC 026 – Brooches and Buttons for Clothing
7	CHANEL	1,510,757	November 1, 1988
8			IC 009 - Sunglasses
9		1,654,252	August 20, 1991
10			IC 009 - Sunglasses
11	CHANEL	1,733,051	November 17, 1992
12			IC 018 - Leather Goods; namely, Handbags, Wallets, Travel Bags, Luggage, Business and Credit Card Cases, Change Purses, Tote Bags, Cosmetic Bags Sold Empty, and Garment Bags for Travel
13		1,734,822	November 24, 1992
14			IC 018 - Leather Goods; namely, Handbags, Wallets, Travel Bags, Luggage, Business Card Cases, Change Purses, Tote Bags, and Cosmetic Bags Sold Empty
15	J12	2,559,772	April 9, 2002
16			IC 014 -Timepieces; namely, Watches, and Parts Thereof
17		3,022,708	December 6, 2005
18			IC 006 - Key Chains
19			IC 009 -Ski Goggles, Sunglasses
20			IC 018 -Luggage, Handbags, Totes, Backpacks, Travel Bags, All-Purpose Carrying Bags, Umbrellas
21			IC 025 - Boots, Coats, Jackets, Gloves, Hats, Pants, Sandals, Scarves, Shirts, Shoes, Ski Boots, Sun Visors, Suspenders, Sweatbands, Swimwear
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1			IC 028 - Bags Specially Adopted For Sports Equipment, Basketballs, Kites, Skis, Ski Polls, Tennis Rackets, Tennis Balls, Tennis Racket Covers, Golf Clubs, Golf Bags, and Snow Boards
2			
3			
4		3,025,934	December 13, 2005
5			IC 018 – Handbags
6			
7		3,025,936	December 13, 2005
8			IC 009 -Mobile Phone Straps, Eyeglass Frames, Sunglasses
9			IC 025 - Gloves, Swimwear
10			IC 026 - Hair Accessories Namely Barrettes And Pony-Tail Holders
11	CHANEL	3,133,139	August 22, 2006
12			IC 014 - Jewelry And Watches

13 (the “Chanel Marks”) which are registered on the Principal Register of the United States Patent and
14 Trademark Office and are used in connection with the manufacture and distribution of high quality
15 goods in the categories identified above. (Hahn Decl. ¶ 4; see also United States Trademark
16 Registrations of the Chanel Marks at issue [“Chanel Trademark Registrations”] attached as Exhibit
17 A to the Hahn Decl.).

18 The Defendants have advertised, offered for sale, and/or sold, at least, handbags, wallets,
19 shoes, boots, sunglasses, scarves, tee shirts, watches, and costume jewelry, including necklaces,
20 bracelets, earrings, brooches, and rings, bearing what Plaintiff has determined to be counterfeits,
21 infringements, reproductions, and/or colorable imitations of the Chanel Marks. Although each of the
22 Defendants may not copy and infringe each Chanel Mark for each category of goods protected,
23 Chanel has submitted sufficient evidence showing each Defendant has infringed, at least, one or
24 more of the Chanel Marks. (Hahn Decl. ¶¶ 11-15; Declaration of Brandon Tanori in Support of
25 Plaintiff’s *Ex Parte* Application for Entry of Temporary Restraining Order and Preliminary
26 Injunction [“Tanori Decl.”] ¶ 4.) The Defendants are not now, nor have they ever been, authorized
27 or licensed to use, reproduce, or make counterfeits, infringements, reproductions, and/or colorable
28 imitations of the Chanel Marks. (Hahn Decl. ¶ 9.)

1 Plaintiff's counsel retained Brandon Tanori ("Tanori") of Investigative Consultants, a
2 licensed private investigative firm, to investigate suspected sales of counterfeit Chanel branded
3 products by the Defendants. (Hahn Decl. ¶ 10; Tanori Decl. ¶ 3.) Between August 25, 2011 and
4 September 1, 2011, Tanori accessed the Internet websites operating under the ten of the domain
5 names at issue in this action, chanelbagsnow.com, co-cochanel.com, chanel-j12.org,
6 cheapshoes169.com, luxurychanelgifts.com, voguechanel.com, replicachanelonline.com,
7 hahaclothing.com, topbrandbag.net, and fashioncheapjewelry.com, placed orders for the purchase of
8 various Chanel branded products, including two handbags, one wallet, one watch, one pair of shoes,
9 one scarf, one pair of earrings, one pair of sunglasses, one tee shirt, and one necklace, and requested
10 each product purchased be shipped to his address in Las Vegas, Nevada. (Tanori Decl. ¶ 4 and
11 Composite Exhibit A attached thereto.) Tanori's purchases were processed entirely online, which
12 included providing shipping and billing information, payment, and confirmation of his orders.
13 (Tanori Decl. ¶ 4 and Composite Exhibit A attached thereto.)

14 Thereafter, a representative of Chanel, Adrienne Hahn Sisbarro, reviewed and visually
15 inspected the web page listings, including images, for each of the Chanel branded goods purchased
16 by Tanori and determined the items were non-genuine Chanel products. (Hahn Decl. ¶¶ 11-12, 15.)
17 Additionally, Hahn reviewed and visually inspected the items bearing the Chanel Marks offered for
18 sale via the Internet websites operating under the partnership and/or unincorporated association
19 names identified on Schedule "A" hereto (the "Subject Domain Names") and determined the
20 products were non-genuine Chanel products. (Hahn Decl. ¶ 13-15 and Composite Exhibits B and C
21 attached thereto, relevant web page captures from the Defendants' Internet websites operating under
22 the Subject Domain Names displaying the Chanel branded items offered for sale.)

23 II. Conclusions of Law

24 The declarations Plaintiff submitted in support of its Application for TRO support the
25 following conclusions of law:

26 A. Plaintiff has a very strong probability of proving at trial that consumers are likely to
27 be confused by the Defendants' advertisement, promotion, sale, offer for sale, and/or distribution of
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1 handbags, wallets, shoes, boots, sunglasses, scarves, tee shirts, watches, and costume jewelry,
2 including necklaces, bracelets, earrings, brooches, and rings bearing counterfeits, infringements,
3 reproductions, and/or colorable imitations of the Chanel Marks, and that the products the Defendants
4 are selling are copies of Plaintiff's products that bear marks which are substantially indistinguishable
5 from and/or colorful imitations of the Chanel Marks on handbags, wallets, shoes, boots, sunglasses,
6 scarves, tee shirts, watches, and costume jewelry, including necklaces, bracelets, earrings, brooches,
7 and rings. Because of the infringement of the Chanel Marks, Plaintiff is likely to suffer immediate
8 and irreparable injury if a temporary restraining order is not granted. It clearly appears from the
9 following specific facts, as set forth in Plaintiff's Complaint, Plaintiff's Application for TRO, and
10 accompanying declarations on file, that immediate and irreparable loss, damage, and injury will
11 result to Plaintiff and to consumers before the Defendants can be heard in opposition unless
12 Plaintiff's request for *ex parte* relief is granted:

13 1. The Defendants own or control Internet business operations which advertise,
14 promote, offer for sale, and sell, at least, handbags, wallets, shoes, boots, sunglasses, scarves, tee
15 shirts, watches, and costume jewelry, including necklaces, bracelets, earrings, brooches, and rings
16 bearing counterfeit and infringing trademarks in violation of Plaintiff's rights;

17 2. There is good cause to believe that more counterfeit and infringing handbags,
18 wallets, shoes, boots, sunglasses, scarves, tee shirts, watches, and costume jewelry, including
19 necklaces, bracelets, earrings, brooches, and rings bearing Plaintiff's trademarks will appear in the
20 marketplace; that consumers may be misled, confused, and disappointed by the quality of these
21 products; and that Plaintiff may suffer loss of sales for its genuine products;

22 3. There is good cause to believe that if Plaintiff proceeds with normal advance
23 notice to the Defendants on this Application for TRO, the Defendants can easily and quickly transfer
24 the registrations for many of the Subject Domain Names, or modify registration data and content,
25 change hosts, and redirect traffic to other websites, thereby thwarting Plaintiff's ability to obtain
26 meaningful relief;

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1 (2) The Defendants, their officers, directors, employees, agents, subsidiaries, distributors,
2 and all persons in active concert or participation with the Defendants having notice of this
3 Temporary Restraining Order shall immediately discontinue the use of the Chanel Marks or any
4 confusingly similar trademarks, on or in connection with all Internet websites owned and operated,
5 or controlled by them including the Internet websites operating under the Subject Domain Names;

6 (3) The Defendants, their officers, directors, employees, agents, subsidiaries, distributors,
7 and all persons in active concert or participation with the Defendants having notice of this
8 Temporary Restraining Order shall immediately discontinue the use of the Chanel Marks, or any
9 confusingly similar trademarks within domain name extensions, metatags or other markers within
10 website source code, from use on any webpage (including as the title of any web page), any
11 advertising links to other websites, from search engines' databases or cache memory, and any other
12 form of use of such terms which is visible to a computer user or serves to direct computer searches
13 to websites registered by, owned, or operated by the Defendants, including the Internet websites
14 operating under the Subject Domain Names;

15 (4) The Defendants shall not transfer ownership of the Subject Domain Names during the
16 pendency of this Action, or until further Order of the Court;

17 (5) The domain name Registrars for the Subject Domain Names are directed to transfer to
18 Plaintiff's counsel, for deposit with this Court, domain name certificates for the Subject Domain
19 Names;

20 (6) Upon entry of this Order, Plaintiff shall provide a copy of the Order by email to the
21 registrar of record for each of the Subject Domain Names, so that the registrar of record of each of
22 the Subject Domain Names may, in turn, notify each registrant of the Order and provide notice of the
23 locking of the domain name to the registrant of record. After providing such notice to the registrars
24 so the domain names may be locked, Plaintiff shall also provide notice and a copy of this Order to
25 the registrant of each Subject Domain Name via email to the email address provided as part of the
26 domain registration data for each of the Subject Domain Names identified in Composite Exhibit C to
27 the Declaration of Stephen M. Gaffigan in Support of the Application for TRO. If an email address
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1 was not provided as part of the domain registration data for a Subject Domain Name, Plaintiff shall
2 provide notice and a copy of this Order to the operators of the Internet websites via the email
3 addresses provided on the Internet websites operating under such Subject Domain Names as
4 identified in Composite Exhibit C to the Declaration of Stephen M. Gaffigan in Support of the
5 Application for TRO. After forty-eight (48) hours have elapsed after provision of this Order to the
6 registrars of record and the registrants, Plaintiff shall provide a copy of this Order to the registries for
7 the Subject Domain Names for the purposes described in Paragraph 7 *infra*.

8 (7) The top-level domain (TLD) Registries for the Subject Domain Names, within ten
9 (10) days of receipt of this Temporary Restraining Order shall change the registrar of record for the
10 Subject Domain Names, excepting any such domain names which such Registries have been notified
11 in writing by the Plaintiff have been or will be dismissed from this action, to a holding account with
12 the United States based Registrar, GoDaddy.com, Inc. Upon the change of the registrar of record for
13 the Subject Domain Names to the holding account, GoDaddy.com, Inc. will hold access to the
14 Subject Domain Names in trust for the Court during the pendency of this action. Additionally,
15 GoDaddy.com, Inc. shall immediately update the Domain Name System (“DNS”) data it maintains
16 for the Subject Domain Names, which link the domain names to the IP addresses where their
17 associated websites are hosted, to NS1.MEDIATEMPLE.NET and NS2.MEDIATEMPLE.NET,
18 which will cause the domain names to resolve to the website where a copy of the Complaint,
19 Summonses, Temporary Restraining Order, and all other documents on file in this action are
20 displayed. Alternatively, GoDaddy.com, Inc. may institute a domain name forwarding which will
21 automatically redirect any visitor to the Subject Domain Names to the following Uniform Resource
22 Locator (“URL”) <http://servingnotice.com/sdv/index.html> whereon copies of the Complaint,
23 Summonses, Temporary Restraining Order, and all other documents on file in this action are
24 displayed. After GoDaddy.com, Inc. has effected this change the Subject Domain Names shall be
25 placed on Lock status, preventing the modification or deletion of the domains by the registrar or the
26 Defendants;

1 (8) Plaintiff may enter the Subject Domain Names into Google's Webmaster Tools and
2 cancel any redirection of the domains that have been entered there by the Defendants which redirect
3 traffic to the counterfeit operations to a new domain name and thereby evade the provisions of this
4 Temporary Restraining Order;

5 (9) The Defendants shall preserve copies of all their computer files relating to the use of
6 any of the Subject Domain Names and shall take all steps necessary to retrieve computer files
7 relating to the use of the Subject Domain Names and that may have been deleted before the entry of
8 this Temporary Restraining Order;

9 (10) This Temporary Restraining Order shall remain in effect until the date for the hearing
10 on the Motion for Preliminary Injunction set forth below, or until such further dates as set by the
11 Court or stipulated to by the parties;

12 (11) This Temporary Restraining Order shall apply to the Subject Domain Names and any
13 other domain names properly brought to the Court's attention and verified by sworn affidavit which
14 verifies such new domain names are being used by Defendants for the purpose of counterfeiting the
15 Chanel Marks at issue in this action and/or unfairly competing with Chanel in connection with
16 search engine results pages;

17 **BOND TO BE POSTED**

18 (12) Pursuant to 15 U.S.C. § 1116(d)(5)(D), Plaintiff shall post a bond in the amount of
19 Twenty Thousand Dollars and Zero Cents (\$20,000.00), as payment of damages to which
20 Defendants may be entitled for a wrongful injunction or restraint. Plaintiff shall post the bond prior
21 to requesting the registries change to the registrar of record for the Subject Domain Names to a
22 holding account with GoDaddy.com, Inc.

23 **PRELIMINARY INJUNCTION**

24 (13) A hearing is set before this Court in the United States Courthouse located 333 S. Las
25 Vegas Blvd, Las Vegas, Nevada 89101, Courtroom 6D, on _____, 2011, at _____,
26 or at such other time that this Court deems appropriate, on Plaintiff's Motion for a Preliminary
27 Injunction restraining the Defendants, their officers, directors, employees, agents, subsidiaries,
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1 distributors, and all persons in active concert or participation with the Defendants from engaging in
2 the activities that are subject of the above Temporary Restraining Order;

3 (14) Plaintiff shall serve copies of the Complaint, Application for TRO and this
4 Temporary Restraining Order and all other pleadings and documents on file in this action on all the
5 Defendants by email as described above and by posting copies of the Application for TRO and this
6 Temporary Restraining Order on the website located at <http://servingnotice.com/sdv/index.html>
7 within forty-eight (48) hours of control of the Subject Domain Names being changed to the Court via
8 the GoDaddy.com, Inc. holding account, and such notice so given shall be deemed good and
9 sufficient service thereof. Plaintiff shall continue to provide notice of these proceedings and copies
10 of the documents on file in this matter to the Defendants by regularly updating the website located at
11 <http://servingnotice.com/sdv/index.html> or by other means reasonably calculated to give notice
12 which is permitted by the Court. Any response or opposition to Plaintiff's Motion for Preliminary
13 Injunction must be filed and served on Plaintiff's counsel prior to the hearing set for * see below, 2011,
14 2011, and filed with the Court, along with Proof of Service, on * see below, 2011. Plaintiff
15 shall file any Reply Memorandum on or before * see below, 2011. The above dates may be
16 revised upon stipulation by all parties and approval of this Court. The Defendants are hereby on
17 notice that failure to appear at the hearing may result in the imposition of a preliminary injunction
18 against them pursuant to 15 U.S.C. § 1116(d) and Fed. R. Civ. P. 65.

19 **Hearing is set for 10/11/2011 at 9:00 AM. Defendants to file a response by 10/4/2011.
20 Plaintiff to file replies by 10/7/2011.

21 IT IS SO ORDERED.

22 DATED: September 26, 2011



23 Kent J. Dawson
24 United States District Judge
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SCHEDULE A

DEFENDANTS BY SUBJECT DOMAIN NAMES AND DEFENDANT NUMBER

Defendant 1	eukuk.com ktiffany.com a2o5.com*
Defendant 2	canadatoryburch.net toryburchcanada.net
Defendant 3	chanelbagsnow.com chanelbagsol.com coachbagsol.com
Defendant 4	cheapbagsgarden.com cheapbagssales.com
Defendant 5	cheapsunglassesoutlet.org designersunglassesoutlet.org
Defendant 6	clothes2supplier.net store6.net
Defendant 7	co-bag.com cobags.com
Defendant 8	dgshoestores.com dgshoestores.net
Defendant 9	fakeoakleysunglasses2u.com shoessaleusa.com towholesaler.com
Defendant 10	heheebags.com hehegbags.com herebags.com
Defendant 11	hotdiscountshoes.com leletrade.com
Defendant 12	bags-shoes-china.com iofferb2b.com kairystrade.com
Defendant 13	lady-store.net lovecoachs.com
Defendant 14	louisvuittonhandbagsonsale.net louisvuittonidea.com
Defendant 15	luxury-designerhandbags.net outlet-designerhandbags.net
Defendant 16	lv06.com lvshopping.com

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Defendant 17	myhandbaghut.com myskysshoes.com
Defendant 18	raybansunglasses.net sunglassesoutletshop.net
Defendant 19	topwholesalefashion.com topwholesalefashion.net
Defendant 20	cheap-handbags-edge.com wholesalebrandhandbags.us wholesalecheapjewelrys.com wholesale-cheap-jewelrys.com wholesalejewelrysmart.com
Defendant 21	knockoffo.com tpurses.com
Defendant 22	oakleysunglass-cheap.com oakleysunglassesaaa.com oakleysunglassestopsale.com
Defendant 23	highheeled-shoes.com hulantrading.com women-high-heels.com
Defendant 24	co-cochanel.com sexybikinissunglass.com womanhighheel.com
Defendant 25	mynike-shoe.com chian-jmmc.com* furnesstoolset.com* gigglesandsunshine.com*
Defendant 26	ezshopchina.com luxuryshoechina.com urbanclothesmall.com
Defendant 27	hketa.net watchsell.net
Defendant 28	lilykala21.com maplem2010.com
Defendant 29	puretimeshop.com blog4rolex.com*
Defendant 30	ideal-replica.com popselling.com
Defendant 31	eb67.com eb97.com weekbag.com
Defendant 32	sunglasses.net-us.com sunglassesonlinestore-us.com
Defendant 33	sweet-bag.com vogue-bags.com

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Defendant 34	discount-wholesalejewelry.com wholesale-cheapjewelry.com wholesale-cheap-jewelry.com
Defendant 35	chanelhandbagsforcheap.com cocochanelbags.net tiffanyandco-us.net
Defendant 36	cheapclothingshop.com cheapshoesclothes.com chinaclotingstore.com
Defendant 37	buychanelhandbagsonline.net chanelbags-shop.com chanelbags-shop.net
Defendant 38	crazy-trade.com worthtobuy.com
Defendant 39	asiahongs.com nowmalls.com
Defendant 40	guccihandbagsnet.com usshoesnet.com
Defendant 41	linkcl.com linkcl.us outletsky.com shoe-sandals.com
Defendant 42	buyluxurynow.com fairoptical.com jewelryshopnow.com
Defendant 43	auchanel.com shoesheelswedges.com bagsarticle.com*
Defendant 44	handbagsdesignercheap.com bags-diary.com*
Defendant 45	discount-sunglasshut.com mysunglasshut.com
Defendant 46	brandbagshop.org popularbags.org topbrandbag.net
Defendant 47	chbagshop.com cheapbagsforsale.net cheapchbagsforsale.com newchsale.com
Defendant 48	ebuysunglasses.com sellsunglass.com
Defendant 49	chanelsonline.com cheapchanel.com

1	Defendant 50	newfashiontalk.com stylestalks.com
2	Defendant 51	cheapsunglassesbrands.com cheapsunglassesmarket.com
3	Defendant 52	coachonline-sale.org beautifulboygirl.com* supplier-shops.com*
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5	Defendant 53	hellorolex.com travelinginfos.com*
6	Defendant 54	replica-watches-brands.com watchfordream.net chanelreplicawatches.org*
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8	Defendant 55	cheap-discount-jordans.com favourite-bags.com nikeairjodanssell.com l-price.com applehot.com* dvdwhole.com*
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11	Defendant 56	chanelbagsusa.com luxurybags123.com*
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13	Defendant 57	111mall.com
14	Defendant 58	2011missupra.com
15	Defendant 59	2011sunglasseshut.com
16	Defendant 60	2buytiffany.com
17	Defendant 61	51will.net
18	Defendant 62	520watches.com
19	Defendant 63	925mall.com
20	Defendant 64	aaa-handbag.com
21	Defendant 65	a-beststore.com
22	Defendant 66	accessorywow.com
23	Defendant 67	acheterchanelonline.com
24	Defendant 68	agoodbags.info
25	Defendant 69	allbazaar.net
26	Defendant 70	allbrandoutlet.com
27	Defendant 71	asunglassesoutlet.com
28	Defendant 72	atwholesalestore.com

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Defendant 73	auburnhometownrealty.com
Defendant 74	authenticbagsonsale.com
Defendant 75	authentic-chanel-outlet.com
Defendant 76	authentichandbagsshop.com
Defendant 77	b2changbagsoutlet.com
Defendant 78	bag2u.com
Defendant 79	bagsbestshop.com
Defendant 80	bagscoming.com
Defendant 81	bags-easy.com
Defendant 82	bagsshowtime.com
Defendant 83	bagswatchoutlet.com
Defendant 84	bagswholesales.com
Defendant 85	bagsyard.com
Defendant 86	baratoschanel.com
Defendant 87	besthandbags-sales.com
Defendant 88	best-highheels.com
Defendant 89	bestsunglassesoutlet.com
Defendant 90	best-watch-shop.com
Defendant 91	bigtimesunnies.com
Defendant 92	brandbagfactory.com
Defendant 93	brandhat.net
Defendant 94	brandnewhandbag.com
Defendant 95	brandreplicashop.com
Defendant 96	brand-sneakers.net
Defendant 97	brandstyleline.com
Defendant 98	brandsunglassessupplier.com
Defendant 99	brandwatch8.com
Defendant 100	breaksneaker.com

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Defendant 101	btobuy.com
Defendant 102	bulkforu.com
Defendant 103	buychanelhere.com
Defendant 104	buy-cheap-chanel.com
Defendant 105	buy-jordons.com
Defendant 106	buysunglassesus.com
Defendant 107	buyswissreplicawatches.com
Defendant 108	ca147.com
Defendant 109	ceramicj12watches.com
Defendant 110	chanelOnline.com
Defendant 111	chanelbag-online.com
Defendant 112	chanelbagoutlets.net
Defendant 113	chanelbags2011.com
Defendant 114	chanelbags2012.com chanelbags-2012.com
Defendant 115	chanelbags7.com
Defendant 116	chanelbags-online.com
Defendant 117	chanelbagsonlines.com
Defendant 118	chanel-bags-onsale.com
Defendant 119	chanelbagsstores.com
Defendant 120	chanel-bags-uk.co.uk
Defendant 121	chanelbagsus.net cheapchanelbagsforsale.net
Defendant 122	chanelbagswholesale.com
Defendant 123	chanelby.com
Defendant 124	chanel-chanel.net
Defendant 125	chanel-handbag.co.uk
Defendant 126	chanelhandbagschina.com
Defendant 127	chanelhandbagsky.com

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Defendant 128	chanelhandbags-outlet.net
Defendant 129	chanel-j12.org
Defendant 130	chanel-j12-watches.com
Defendant 131	chanelltdonline.com
Defendant 132	chanelonlineshopping.us
Defendant 133	chanelonsales.com
Defendant 134	chanel-outlet2011.com
Defendant 135	chaneloutlet-online.com
Defendant 136	chanelproduct.com
Defendant 137	chanelreplicaoutlet.us chaneloutletforsale.us
Defendant 138	chanelstore.net
Defendant 139	channelsunglass2011.com
Defendant 140	channelsunglasses2010.com
Defendant 141	channelsunglassesshop.info
Defendant 142	chaneluksale.com
Defendant 143	chanelukshop.com chanelukstore.com
Defendant 144	chanel-watches.us
Defendant 145	chanelwatches-outlet.com
Defendant 146	charmtide.com
Defendant 147	cheapbagsonsale.com
Defendant 148	cheapbagsoutlet2011.com
Defendant 149	cheapchanelbagsforsale.com
Defendant 150	cheapchanelbags-outlet.com
Defendant 151	cheapchannelsunglasses.com
Defendant 152	cheapchannelsunglasses.net
Defendant 153	cheap-coachoutlet.com
Defendant 154	cheapdesignersunglassessale.com

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Defendant 155	cheapdesignerwholesale.net
Defendant 156	cheaperchinacloting.com
Defendant 157	cheapforsneakers.com
Defendant 158	cheaphandbag.biz
Defendant 159	cheaphandbags1.com
Defendant 160	cheap-handbags-sale.com
Defendant 161	cheaphandbagssale.us
Defendant 162	cheapoakleysoutlet.net
Defendant 163	cheapoakleysunglassesus.com
Defendant 164	cheapshoes169.com
Defendant 165	cheapsunglassesshop.net
Defendant 166	cheap-sunglasses-uk.com
Defendant 167	cheapsunglassesus.com
Defendant 168	cheap-supply.com
Defendant 169	cheaptiffanystore.com
Defendant 170	cheapwholesalefashion.com
Defendant 171	cheapwomens.org
Defendant 172	chinabrandonline.com
Defendant 173	chinaclotingsale.com
Defendant 174	china-export-suppliers.com
Defendant 175	china-fad.com
Defendant 176	chinafashionjewelry.net
Defendant 177	choose-you-like.com
Defendant 178	christian-outlet.net
Defendant 179	christyshop.com
Defendant 180	clyslshoes.com
Defendant 181	cnwholesalestore.com
Defendant 182	coachbags365.com

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Defendant 183	coachhandbagsreplica.com
Defendant 184	cocochanelbag.com
Defendant 185	coolsunglasses2011.com
Defendant 186	coposhoe.com
Defendant 187	copyokay.com
Defendant 188	countyjewelrystore.com
Defendant 189	d9go.com
Defendant 190	damnfly.com
Defendant 191	designerbagsfactory.com
Defendant 192	designerclothestore.com
Defendant 193	designerdiscountbags.com
Defendant 194	designer-shoe.org
Defendant 195	designersunglasseshut2011.com
Defendant 196	designersunglassestore.com
Defendant 197	designsunglass.com
Defendant 198	discountchanel-handbags.com
Defendant 199	discountchanelshops.com
Defendant 200	discountchanelstores.com
Defendant 201	discount-sunglasses-on-sale.com
Defendant 202	discountsunglassesoutlet.net
Defendant 203	discountsunglassessale.com
Defendant 204	divadollscloset.com
Defendant 205	dsqstock.com
Defendant 206	ecboots.com
Defendant 207	echeapclothing.com
Defendant 208	egohandbags.com
Defendant 209	eluxbag.com
Defendant 210	emiumiubags.com

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Defendant 211	enreplica.com
Defendant 212	eralphlauren.com
Defendant 213	erbags.com
Defendant 214	eshoppinggucci.com
Defendant 215	ewcss.com
Defendant 216	facevogue.net
Defendant 217	faith-trade.com
Defendant 218	fake-bags.com
Defendant 219	fakechanelbagsshop.us
Defendant 220	fakesunglasseshut.com
Defendant 221	cheapchanelbagss.com fashionchanelbag.com
Defendant 222	fashionchanelhandbag.com
Defendant 223	fashioncheaphandbag.com
Defendant 224	fashioncheapjewelry.com
Defendant 225	fashionhandbagsplaza.com
Defendant 226	fashionkingdoms.com
Defendant 227	fashion-ol.com
Defendant 228	fashionpeoples.com
Defendant 229	fashionrealbags.com
Defendant 230	fashions4life.com
Defendant 231	firstfashion.biz
Defendant 232	frenchperfumeshop.com
Defendant 233	f-wholesale.com
Defendant 234	generaljewellery.com
Defendant 235	get-bag.com
Defendant 236	girl-sunglasses.com
Defendant 237	glassescheaponline.com

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Defendant 238	globalbuy.org
Defendant 239	go2like.com
Defendant 240	gogomalls.com
Defendant 241	goodcoachbag.com
Defendant 242	good-lookingshoes.com
Defendant 243	goodbags.com
Defendant 244	groundmart.biz
Defendant 245	grunstore.com
Defendant 246	guccilvshoes.com
Defendant 247	guccipursewallets.com
Defendant 248	hahabags.com
Defendant 249	hahaclotthing.com
Defendant 250	handbagcheapshop.com
Defendant 251	handbagpops.com
Defendant 252	handbags1688.com
Defendant 253	handbags4sell.com
Defendant 254	handbags-discount.com
Defendant 255	handbagshermes.com
Defendant 256	handbagstowholesale.com
Defendant 257	hao1574.com
Defendant 258	hatglass.com
Defendant 259	hatswarehouse.com
Defendant 260	heregogo.com
Defendant 261	hermesbagsseller.com
Defendant 262	highheels-retail.com
Defendant 263	hottrade2008.com
Defendant 264	hot-watch-shop.com
Defendant 265	infoed.net

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Defendant 266	inwholesalestore.com
Defendant 267	irdatacorp.com
Defendant 268	italiandesigner2u.com
Defendant 269	items-trade.com
Defendant 270	j12channel.com
Defendant 271	jerseymaker.com
Defendant 272	jewelrycollect.com
Defendant 273	jewelry-sterling-silver.com
Defendant 274	jewelrywholesalejewellery.com
Defendant 275	joybuyhandbags.com
Defendant 276	kaufenchanelonline.com
Defendant 277	kisstrend.com
Defendant 278	ladybagonsale.com
Defendant 279	ladybagsfactory.com
Defendant 280	likebuybags.com
Defendant 281	likeswisswatches.com
Defendant 282	lokobuy.com
Defendant 283	louboutin-christian.com
Defendant 284	louisvuittonhandbags.cc
Defendant 285	louisvuitton-lvhandbags.net
Defendant 286	louisvuittonpurses2.com
Defendant 287	louisvuitton-us.com
Defendant 288	lovebagstore.com
Defendant 289	luxecheaphandbags.com
Defendant 290	luxurybagsupplier.com
Defendant 291	luxurychanelgifts.com
Defendant 292	luxury-in-china.net
Defendant 293	lvbageshop.com

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Defendant 294	lvgoodbag.com
Defendant 295	lv-sale.net
Defendant 296	mallofbag.com
Defendant 297	marcjacobshandbagssale.com
Defendant 298	mychanelkingdom.com
Defendant 299	myshoesdream.com
Defendant 300	myskyhandbags.com
Defendant 301	mysunglasseshut.com
Defendant 302	mywatch39.com
Defendant 303	nethotstore.com
Defendant 304	newbagscheap.com
Defendant 305	newfaithtrade.com
Defendant 306	nextangel.com
Defendant 307	niceniceshop.com
Defendant 308	nicesunglass.com
Defendant 309	nikeperfect.com
Defendant 310	novbags.com
Defendant 311	oakley2sunglasses.com
Defendant 312	oakleyssunglasses-hot.com oakleysunglasses-hot.com
Defendant 313	oakleytopsale.com
Defendant 314	oksunglassesforcheap.com
Defendant 315	oksunglasseshut.com
Defendant 316	online-fashiongoods.com
Defendant 317	onlinetradese.com
Defendant 318	outlet-express.net
Defendant 319	paypalcoachpurses.com
Defendant 320	popbrands.net

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Defendant 321	purelife-bags.com
Defendant 322	purses-chanel.com
Defendant 323	relyshops.com
Defendant 324	replicachanel2u.org
Defendant 325	replicachanelonline.com
Defendant 326	replica-coco-lv.com
Defendant 327	replicadesignerhandbagssale.com
Defendant 328	replica-fake-watches.com
Defendant 329	replicahandbagss.org
Defendant 330	replicarayban.net
Defendant 331	replicas-bags-store.com
Defendant 332	replicashandbags.biz
Defendant 333	replica-supplier.com
Defendant 334	replicas-watches-sell.com
Defendant 335	replica-watches-eshop.com
Defendant 336	repliwatch.com
Defendant 337	republic-handbags.com
Defendant 338	rescuwallet.com
Defendant 339	sale66.com
Defendant 340	salehandbagsbags.com
Defendant 341	saleraybansunglasses.org
Defendant 342	saveintrade.com
Defendant 343	buy4cheaps.fr selfband.com
Defendant 344	sellpurse.com
Defendant 345	selsales.com
Defendant 346	shangtrade.com
Defendant 347	sheerbeautybareminerals.com

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Defendant 348	shoesrunning.com
Defendant 349	shopcn.biz
Defendant 350	shopingstock.com
Defendant 351	storereplica.com
Defendant 352	sumbags.com
Defendant 353	sunglassesrayban.net
Defendant 354	sunglassessaler.com
Defendant 355	sunglasses-shoppe.com
Defendant 356	sunglassessky.com
Defendant 357	sunglasses-sky.com
Defendant 358	sunglassko.com
Defendant 359	sunglassoutlet.us
Defendant 360	supplyshoes.com
Defendant 361	swissreplica.co.uk
Defendant 362	swissreplicaauk.com
Defendant 363	thefirstbag.com
Defendant 364	thevoguelady.com
Defendant 365	tiffanyand-co.com
Defendant 366	tiffanyonlineus.net
Defendant 367	tiffanyoutletus.com
Defendant 368	topbagswell.com
Defendant 369	topluxurybagsoutlet.com
Defendant 370	topreplicaonline.com
Defendant 371	topwholesalestore.com
Defendant 372	tradingbus.com
Defendant 373	usayahooo.com
Defendant 374	ushandbagswholesale.com
Defendant 375	ustoryburchoutlets.com

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Defendant 376	voguechanel.com
Defendant 377	wal-watch.com
Defendant 378	watcharoo.com
Defendant 379	watches-7.com
Defendant 380	watchsaleshop.com
Defendant 381	weekendbuy.com
Defendant 382	wholesalechanelshoes.info
Defendant 383	wholesalecheapjewelrychina.com
Defendant 384	wholesale-coach-bags.com
Defendant 385	wholesaledesignerhandbags.us
Defendant 386	wholesalejewelry168.com
Defendant 387	wholesalejewelrycity.com
Defendant 388	wholesalejewelry-fashion.com
Defendant 389	wholesalenikeshoes.com
Defendant 390	wholesalepursesforcheap.com
Defendant 391	winksandco.com
Defendant 392	womensfashionshop.com
Defendant 393	worldbrandhandbags.com
Defendant 394	xmasgate.com
Defendant 395	yahbags.com
Defendant 396	yearhandbags.com
Defendant 397	yourjeansyouchoose.com
Defendant 398	yys66.com
Defendant 399	chanel-bags.me

* - Denotes blog style website.