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Attorneys for Plaintiffs  
Chanel, Inc. and Louis Vuitton Malletier, S.A.

THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

CHANEL, INC., a New York corporation )  
and LOUIS VUITTON MALLETIER, )  
S.A., a foreign business entity, )  
Plaintiffs, )  
v. )  
SOPHIA ZHANG, YAN RIQIN and )  
DOES 1-10, individually and jointly, d/b/a )  
HIGHREPLICA.COM, )  
HIGH-REPLICA.COM, )  
RUNWAYHANDBAGS.NET, )  
BAGS-REPLICA.COM, )  
BUY-TIFFANY.COM, )  
HIGHCHARMS.COM, )  
FASHIONREPLICABAGS.COM, )  
FASHIONTAVERN.COM, )  
LUXUNION.COM, )  
LUX62.COM, )  
REPLICAHAUSE.COM, )  
REPLICA-SILVER.COM, )  
SIGHTFOCUS.COM, )  
REPLICAS-BAG.COM, )  
TIFFANY-FOCUS.COM, )  
REPLICAS8.COM, )  
Defendants. )

Case No. C-09-1977 MMC  
**[PROPOSED] ORDER TO SHOW  
CAUSE**

1 THIS CAUSE came before the Court upon Plaintiffs', Chanel, Inc., a New York corporation,  
2 ("Chanel") and Louis Vuitton Malletier, S.A., a foreign business entity ("Louis Vuitton") (together,  
3 "Plaintiffs") Motion for Order to Show Cause Why the Defendant Yan Riqin ("Riqin") Should Not  
4 be Held in Civil Contempt and Sanctioned. On December 7, 2009, this Court entered Final Default  
5 Judgment against Riqin and in favor of Plaintiffs and issued a Permanent Injunction prohibiting  
6 Riqin from committing further acts of infringement and unfair competition against Plaintiffs. (See  
7 Permanent Injunction (e-docket 28) and Final Default Judgment (e-docket 29)). Plaintiffs now seek  
8 an Order to Show Cause why a finding of contempt and sanctions should not be entered against  
9 Defendant Riqin, for his failure to comply with the December 7, 2009 Permanent Injunction. (e-  
10 docket 28).

12 THE COURT has considered the motion and the pertinent portions of the record, and is  
13 otherwise fully advised in the premises, and no opposition has been filed.

14 Accordingly, the February 26, 2010 hearing on the instant motion is hereby VACATED and  
15 it is **ADJUDGED** as follows:

















17 I. Plaintiffs have met the standard for civil contempt in the Ninth Circuit set forth in  
18 *Labor/Community Strategy Ctr. v. Los Angeles County Metro. Transp. Auth.*, 564 F.3d 1115, 1123  
19 (9th Cir. 2009). Specifically, the Plaintiffs have shown by clear and convincing evidence that  
20 Defendant Riqin violated the Court's Permanent Injunction beyond substantial compliance, not  
21 based on a good faith, reasonable interpretation of the Permanent Injunction. *See id.*; *see also* 15  
22 U.S.C. § 1116; e-docket 28. Therefore, Plaintiffs' Motion for Order to Show Cause Why the  
23 Defendant Riqin Should Not be Held in Civil Contempt and Sanctioned is **GRANTED**. Defendant  
24 Riqin shall file a Response with the Court on or before April 2, 2010 showing cause why he  
25 should not be held in civil contempt and sanctioned for failure to comply with the Court's prior  
26 order. The Defendant's failure to show such good cause on or before April 2, 2010, 2010 may  
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1 result in the entry of the following sanctions without further notice:

2 A. The domain names 178bao.com, 22bag.com, aaahighreplica.com,  
3 angelpurse.com, b2csite.com, bags-replicas.com, bagsspace.com,  
4 canwatches.com, canwatches.net, clonereplicas.com, dig-in-china.com,  
5 ec55.com, eo21.com, hiendless.com, highreplicamall.com, honeyreplica.com,  
6 iamreplica.com, idolwholesale.com, mallwatches.com, mybagsroom.com,  
7 replicahot.com, scarves-wholesale.com, sonpa.com, sunglassfocus.com, top1-  
8 replica.com, watches9.com, watchesshow.com, wellwholesaler.com, and  
9 woicha.com (the “New Domains”) and 20fashion.com, bagsdesigners.com,  
10 bagsstock.com, buy-tiffanys.com, chanel-design.com, chanel-luxury.com,  
11 chanel-mall.com, chaneltrend.com, cocoperfume.com, dearuggboots.com,  
12 ebagsell.com, guccitrend.com, hermes-luxury.com, high-replica-bags.com,  
13 highreplicamall8.com, hotreplicashop.com, idolreplica.net, lv-pifa.com,  
14 replica-handbags-biz.com, replica-handbags-focus.com, replica-handbags-  
15 shop.co.uk, replica-iwc-watches.com, replica-perfume.com, replica-  
16 swisswatches.com, replica-watches9.com, replica-watches-supplier.com,  
17 sight-focus.com, thermosmaker.com, top-replica-handbags.com,  
18 vogueunderwear.com, watcheshot.cc, watchesshow.co.uk, and  
19 wholewatches.net (the “Supplemental Domains”) shall be ordered  
20 immediately transferred by the Defendant, his Registrars, and the Registries to  
21 Plaintiffs’ control.

22 B. ~~Riqin shall be further enjoined from registering, owning, controlling, creating~~  
23 ~~or maintaining, directly or indirectly, any additional domain names, online~~  
24 ~~businesses or Internet stores for a period of five (5) years. Any domain~~  
25 ~~names, online businesses or Internet stores proven by Plaintiffs to be~~  
26 ~~registered, created, maintained, owned or controlled by Riqin, his agents,~~  
27 ~~representatives, or those working in concert with Riqin in violation of this~~  
28

1 ~~Order shall be immediately transferred by the Registrar and/or Registry to~~  
2 ~~Plaintiffs' control.~~

3 C. Riqin, his respective officers, directors, employees, agents, subsidiaries,  
4 distributors, and all persons in active concert or participation with Defendant  
5 having notice of this Order shall discontinue immediately the use of the  
6 Chanel trademarks , , CHANEL, , and  the Louis  
7 Vuitton trademarks , , ,  
8 , , , , , , , , , or any  
9 confusingly similar trademarks within domain name extensions, metatags or  
10 other markers within web site source code, from use on any webpage  
11 (including as the title of any web page), any advertising links to other  
12 websites, from search engines' databases or cache memory, and any other  
13 form of use of such terms which is visible to a computer user or serves to  
14 direct computer searches to websites registered by, owned, or operated by  
15 Defendant, including the Internet websites operating under the New Domains  
16 and operating under the Supplemental Domains.

17 D. The domain name Registrars for each of the New Domains and each of the  
18 Supplemental Domains are directed to transfer to Plaintiffs' counsel, for  
19 deposit with this Court, domain name certificates for each of the New  
20 Domains and each of the Supplemental Domains.

21 E. The top level domain (TLD) Registries for the New Domains and the  
22 Supplemental Domains within thirty (30) days of receipt of this Order shall  
23 place the New Domains and the Supplemental Domains on "hold" status and  
24 thus remove the domains from the TLD zone files maintained by the  
25 Registries which link the domain names to the IP addresses where their sites  
26 are hosted.

27 F. Defendant Riqin shall be assessed monetary sanctions in the amount of  
28 \$ \_\_\_\_\_ the Court may deem satisfactory in view of Defendant's conduct.

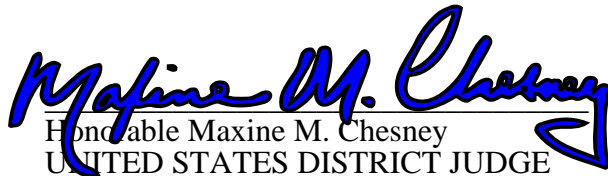
1 II. Beginning as of the date this Order is entered and continuing until such time as this  
2 order is modified, superseded or vacated, neither Defendant Riqin, nor any other person with actual  
3 knowledge of this Order, shall alter, delete, supplement or otherwise change, in whole or in part, the  
4 WHOIS registrant information relating to any of the New Domains or any of the Supplemental  
5 Domains.

6 III. Within seven days of the date this Order is entered, the Registrars for the New  
7 Domains and the Registrars for the Supplemental Domains are hereby Ordered to provide a copy of  
8 this Order to Show Cause together with the papers upon which it is based to Defendant Riqin and to  
9 any other owners or operators of the New Domains and the Supplemental Domains using the most  
10 recent contact information provided to them by Defendant Riqin or by any other owners or operators  
11 of New Domains or the Supplemental Domains in connection with the registration of the New  
12 Domains or the Supplemental Domains.

13 IV. Plaintiffs shall immediately provide all parties and non-parties affected by this Order  
14 with a copy of the Order and the Pleadings upon which it is based.

15 IT IS SO ORDERED

16 Dated: February 24, 2010

17  
18   
19 Honorable Maxine M. Chesney  
20 UNITED STATES DISTRICT JUDGE

21 PRESENTED BY:

22 J. ANDREW COOMBS,  
23 A PROFESSIONAL CORPORATION

24 By: \_\_\_\_\_  
25 J. Andrew Coombs  
26 Nicole L. Drey  
27 Attorneys for Plaintiffs  
28 CHANEL, INC. and LOUIS VUITTON  
MALLETIER, S.A.