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 Chanel, Inc. and Louis Vuitton Malletier, S.A.

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

14 CHANEL, INC., a New York corporation
 and LOUIS VUITTON MALLETIER,
 15 S.A., a foreign business entity,

16 Plaintiffs,

17 v.

18 SOPHIA ZHANG, YAN RIQIN and
 DOES 1-10, individually and jointly, d/b/a
 HIGHREPLICA.COM,
 19 HIGH-REPLICA.COM,
 RUNWAYHANDBAGS.NET,
 20 BAGS-REPLICA.COM,
 BUY-TIFFANY.COM,
 21 HIGHCHARMS.COM,
 FASHIONREPLICABAGS.COM,
 22 FASHIONTAVERN.COM,
 LUXUNION.COM,
 23 LUX62.COM,
 REPLICHAUSE.COM,
 24 REPLICA-SILVER.COM,
 SIGHTFOCUS.COM,
 25 REPLICAS-BAG.COM,
 TIFFANY-FOCUS.COM,
 26 REPLICAS8.COM,

27 Defendants.

Case No. C-09-1977 MMC

~~[PROPOSED]~~ ORDER GRANTING
 PLAINTIFFS' MOTION FOR ORDER
 HOLDING DEFENDANT YAN RIQIN
 IN CONTEMPT; VACATING
 NOVEMBER 12, 2010 HEARING

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 Holding Defendant Yan Riqin in Contempt. On December 7, 2009,
4 this Court entered Final Default Judgment against Riqin and in favor of Plaintiffs and issued a
5 Permanent Injunction prohibiting Riqin from committing further acts of infringement and unfair
6 competition against Plaintiffs. (See Permanent Injunction (e-docket 28) and Final Default Judgment
7 (e-docket 29)). On January 20, 2010 Plaintiffs filed their Motion for Order to Show Cause Why
8 Defendant Yan Riqin Should Not Be Held in Contempt and Sanctioned (the "Motion for Order to
9 Show Cause) (e-docket 31) in connection with Riqin's violation of the Permanent Injunction in this
10 matter through his operation of websites operating under the domain names 178bao.com,
11 22bag.com, aaahighreplica.com, angelpurse.com, b2csite.com, bags-replicas.com, bagsspace.com,
12 canwatches.com, canwatches.net, clonereplicas.com, dig-in-china.com, ec55.com, eo21.com,
13 hiendless.com, highreplicamall.com, honeyreplica.com, iamreplica.com, idolwholesale.com,
14 mallwatches.com, mybagsroom.com, replicahot.com, scarves-wholesale.com, sonpa.com,
15 sunglassfocus.com, top1-replica.com, watches9.com, watchesshow.com, wellwholesaler.com and
16 woicha.com (collectively the "First New Domain Names"). Subsequent to the filing of their Motion
17 for Order to Show Cause, the Plaintiffs discovered Riqin's further violation of the Permanent
18 Injunction matter through his operation of websites operating under the additional domain names
19 20fashion.com, bagsdesigners.com, bagsstock.com, buy-tiffanys.com, chanel-design.com, chanel-
20 luxury.com, chanel-mall.com, chaneltrend.com, cocoperfume.com, dearuggboots.com, ebagsell.com,
21 guccitrend.com, hermes-luxury.com, high-replica-bags.com, highreplicamall8.com,
22 hotreplicashop.com, idolreplica.net, lv-pifa.com, replica-handbags-biz.com, replica-handbags-
23 focus.com, replica-handbags-shop.co.uk, replica-iwc-watches.com, replica-perfume.com, replica-
24 swisswatches.com, replica-watches9.com, replica-watches-supplier.com, sight-focus.com,
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1 thermosmaker.com, top-replica-handbags.com, vogueunderwear.com, watcheshot.cc,
2 watchesshow.co.uk, and wholewatches.net (the "Second New Domain Names") and on February 23,
3 2010 the Plaintiffs filed their Notice of Filing Supplemental Evidence in Support of Motion for
4 Order to Show Cause together with supporting evidence (e-docket 40-44).

5 On February 24, 2010 the Court entered an Order to Show Cause (e-docket 47) finding the
6 Plaintiffs had met the standard for civil contempt in the Ninth Circuit, and requiring Riqin to respond
7 to the Order to Show Cause on or before April 2, 2010. On July 2, 2010, after determining that
8 Riqin was further violating the Permanent Injunction through the operation of the websites operating
9 under the domain names 925silverangel.com, aonehandbags.com, all99dollars.com, apparel-
10 supplier.com,besthandbagblog.com, chanelhandbagsmall.com, chanelvogue.com,
11 designersbagblog.com, dotvv.net, exact-handbags.com, fashionwithbags.com, handbagsair.com,
12 handbagsoul.com, handbagsspace.com, honeyreplicas.com, iamreplicas.com,
13 justtopwatches.com,luxurybagsvendor.com, luxurybagvendor.com, mynike-shoes.com,
14 nexthandbags.com,outletwatchessite.com, replicahandbags2010.com, replicaonsale.com, replica-
15 shopping.com, replicastory.com, shopdreambag.com, shoponebag.com, showthebrand.com,
16 sxja.org,thehandbagbuzz.com, top-brand-handbags.com, topfashionboutique.com, and watches-
17 focus.com (the "Third Set of New Domain Names"), Plaintiffs filed their Second Notice of Filing
18 Supplemental Evidence in Support of Motion for Order to Show Cause together with supporting
19 evidence (e-docket 49-52). To date, Riqin has not responded to the Court's Order to Show Cause as
20 required.
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23 Plaintiffs now seek an Order holding Riqin in contempt for his failure to comply with the
24 December 7, 2009 Permanent Injunction. (e-docket 28).

25 THE COURT has considered the motion and the pertinent portions of the record, ~~having~~
26 ~~heard argument from counsel,~~ and is otherwise fully advised in the premises.¹ Accordingly, it is
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¹ By this order, the Court VACATES the hearing scheduled for November 12, 2010

1 **ADJUDGED** as follows:

2 I. Plaintiffs have met the standard for civil contempt in the Ninth Circuit set forth in
3 *Labor/Community Strategy Ctr. v. Los Angeles County Metro. Transp. Auth.*, 564 F.3d 1115, 1123
4 (9th Cir. 2009). Specifically, the Plaintiffs have shown by clear and convincing evidence that
5 Defendant Riqin violated the Court's Permanent Injunction beyond substantial compliance, not
6 based on a good faith, reasonable interpretation of the Permanent Injunction. *See id.*; *see also* 15
7 U.S.C. § 1116; e-docket 28. Therefore, Plaintiffs' Motion for Order Holding Defendant Yan Riqin
8 in Contempt **GRANTED**.

9 A. The domain names 178bao.com, 22bag.com, aaahighreplica.com,
10 angelpurse.com, b2csite.com, bags-replicas.com, bagsspace.com,
11 canwatches.com, canwatches.net, clonereplicas.com, dig-in-china.com,
12 ec55.com, eo21.com, hiendless.com, highreplicamall.com, honeyreplica.com,
13 iamreplica.com, idolwholesale.com, mallwatches.com, mybagsroom.com,
14 replicahot.com, scarves-wholesale.com, sonpa.com, sunglassfocus.com, top1-
15 replica.com, watches9.com, watchesshow.com, wellwholesaler.com, and
16 woicha.com (the "First New Domain Names"); 20fashion.com,
17 bagsdesigners.com, bagsstock.com, buy-tiffanys.com, chanel-design.com,
18 chanel-luxury.com, chanel-mall.com, chaneltrend.com, cocoperfume.com,
19 dearuggboots.com, ebagsell.com, guccitrend.com, hermes-luxury.com, high-
20 replica-bags.com, highreplicamall8.com, hotreplicashop.com, idolreplica.net,
21 lv-pifa.com, replica-handbags-biz.com, replica-handbags-focus.com, replica-
22 handbags-shop.co.uk, replica-iwc-watches.com, replica-perfume.com, replica-
23 swisswatches.com, replica-watches9.com, replica-watches-supplier.com,
24 sight-focus.com, thermosmaker.com, top-replica-handbags.com,
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1 vogueunderwear.com, watcheshot.cc, watchesshow.co.uk, and
2 wholewatches.net (the “Second New Domain Names”); and
3 925silverangel.com, aonehandbags.com, all99dollars.com, apparel-
4 supplier.com,besthandbagblog.com, chanelhandbagsmall.com,
5 chanelvogue.com, designersbagblog.com, dotvv.net, exact-handbags.com,
6 fashionwithbags.com, handbagsair.com, handbagsoul.com,
7 handbagsspace.com, honeyreplicas.com, iamreplicas.com,
8 justtopwatches.com,luxurybagsvendor.com, luxurybagvendor.com, mynike-
9 shoes.com, nexthandbags.com,outletwatchessite.com,
10 replicahandbags2010.com, replicaonsale.com, replica-shopping.com,
11 replicastory.com, shopdreambag.com, shoponebag.com, showthebrand.com,
12 sxja.org,thehandbagbuzz.com, top-brand-handbags.com,
13 topfashionboutique.com, and watches-focus.com (the “Third New Domain
14 Names”) are hereby ordered to be immediately transferred by the Defendant,
15 his assignees and/or successors in interest or title, and the Registrar to
16 Plaintiffs’ control. To the extent the current Registrar does not facilitate the
17 transfer of the domain name to Plaintiffs’ control within ten (10) days of
18 receipt of this judgment, the United States based Registry shall, within thirty
19 (30) days, transfer the domain names to a United States based Registrar of
20 Plaintiffs’ choosing, and that Registrar shall transfer the domain name to
21 Plaintiffs.
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25 B. Riqin, his respective officers, directors, employees, agents, subsidiaries,
26 distributors, and all persons in active concert or participation with Defendant
27 having notice of this Order shall discontinue immediately the use of the
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Chanel trademarks , , CHANEL, J12, , and , the Louis

Vuitton trademarks LOUIS VUITTON, , , , , ,

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confusingly similar trademarks within domain name extensions, metatags or other markers within web site source code, from use on any webpage (including as the title of any web page), any advertising links to other websites, from search engines' databases or cache memory, and any other form of use of such terms which is visible to a computer user or serves to direct computer searches to websites registered by, owned, or operated by Defendant, including the Internet websites operating under the First, Second and Third New Domain Names.

C. The domain name Registrars for each of the Third New Domain Names are directed to transfer to Plaintiffs' counsel, for deposit with this Court, domain name certificates for each of the Third New Domain Names.


D. The top level domain (TLD) Registries for the First, Second and Third New Domain Names within thirty (30) days of receipt of this Order shall place the First, Second and Third New Domain Names on "hold" status and thus remove the domains from the TLD zone files maintained by the Registries which link the domain names to the IP addresses where their sites are hosted.

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

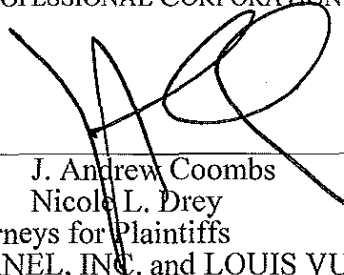
3 IT IS SO ORDERED

4 Dated: November 5, 2010

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6 
7 Honorable Maxine M. Chesney
UNITED STATES DISTRICT JUDGE

8 PRESENTED BY:

9 J. ANDREW COOMBS,
A PROFESSIONAL CORPORATION

10 
11 By: _____
12 J. Andrew Coombs
13 Nicole L. Drey
14 Attorneys for Plaintiffs
CHANEL, INC. and LOUIS VUITTON
MALLETIER, S.A.

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