

1 J. Andrew Coombs (SBN 123881)
 Nicole L. Drey (SBN 250235)
 J. Andrew Coombs, A Prof. Corp.
 2 517 East Wilson Avenue, Suite 202
 Glendale, California 91206
 3 Telephone: (818) 500-3200
 Facsimile: (818) 500-3201
 4 andy@coombspc.com
 nicole@coombspc.com
 5

6 Stephen M. Gaffigan (*Pro Hac Vice*)
 Stephen M. Gaffigan, P.A.
 401 East Las Olas Blvd., Suite 130-453
 7 Ft. Lauderdale, Florida 33301
 Telephone: (954) 767-4819
 8 Facsimile: (954) 767-4821
 stephen@smgpa.net
 9

Attorneys for Plaintiff Louis Vuitton Malletier, S.A.

10
 11 THE UNITED STATES DISTRICT COURT
 12 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 13

14 LOUIS VUITTON MALLETIER, S.A., a) foreign business entity,) 15) Plaintiff,) 16) v.) 17) ABSOLUTE CORP LTD AND DOES 1-) 18 10, individually and jointly, d/b/a) AAAREPLICAS.COM,) 19 AAAREPLICA.COM,) AAAREPLICAS.NET,) 20 KNOCKOFFBAG.COM,)) Defendants.)	Case No. 3:09-cv-05612-MMC PROPOSED DEFAULT JUDGMENT
---	---

21
 22 THIS MATTER having come before the Court upon Plaintiff, Louis Vuitton Malletier,
 23 S.A.’s (“Plaintiff” or “Louis Vuitton”) Motion for Final Default Judgment Against the Defendant
 24 Absolutee Corp. Ltd. (“Absolutee Corp.” or the “Defendant”), and the Court having considered the
 25 moving papers and there being no opposition thereto;

26 IT IS HEREBY ORDERED that Plaintiff’s Motion for Final Default Judgment is
 27 GRANTED, and judgment is entered in favor of Plaintiff, Louis Vuitton Malletier, S.A., a foreign

1 business entity, with its principal place of business located in Paris, France, and against Defendant
2 Absolutee Corp.;

3 IT IS FURTHER ORDERED AND ADJUDGED:

4 1. Pursuant to 15 U.S.C. § 1117(c) Louis Vuitton is awarded statutory damages against
5 Defendant Absolutee Corp., in the amount of Nine Hundred Sixty Thousand Dollars and Zero Cents
6 (\$960,000.00), for which let execution issue;

7 2. Pursuant to 17 U.S.C. § 504; Louis Vuitton is awarded statutory damages against
8 Defendant Absolutee Corp., in the amount of Sixty Thousand Dollars and Zero Cents (\$60,000.00),
9 for which let execution issue;

10 3. Louis Vuitton is awarded costs against Defendant Absolutee Corp., in the amount of
11 Seven Hundred Dollars and Zero Cents (\$700.00), for which let execution issue;

Prejudgment interest served

12 4. ~~Interest~~ from the date this action was ~~filed~~ shall accrue at the legal rate.

13 5. In order to give practical effect to the Permanent Injunction, the domain names
14 aaareplicas.com, aaareplica.com, aaareplicas.net, and knockoffbag.com (the “Subject Domain
15 Names”) are hereby ordered to be immediately transferred by the Defendant, its assignees and/or
16 successors in interest or title, and the Registrars to Plaintiff’s control. To the extent the current
17 Registrars do not facilitate the transfer of the Subject Domain Names to Plaintiff’s control within ten
18 (10) days of receipt of this judgment, the United States based Registry shall, within thirty (30) days,
19 transfer the Subject Domain Names to a United States based Registrar of Plaintiff’s choosing, and
20 that Registrar shall transfer the Subject Domain Names to Plaintiff; and

21 6. Upon Plaintiff’s request, the top level domain (TLD) Registry for the Subject Domain
22 Names, within thirty (30) days of receipt of this Order, shall place the Subject Domain Names on
23 Registry Hold status, thus removing them from the TLD zone files maintained by the Registry which

24 //

25 //

26 //

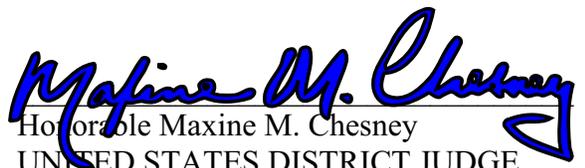
27 //

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

link the Subject Domain Names to the IP addresses where the associated websites are hosted.

IT IS SO ORDERED

Dated: April 19, 2010


Honorable Maxine M. Chesney
UNITED STATES DISTRICT JUDGE

Presented By:

J. Andrew Coombs, A Professional Corp.

By: /s/ Nicole L. Drey
J. Andrew Coombs
Nicole L. Drey
Attorneys for Plaintiff Louis Vuitton Malletier, S.A.