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8 **IN THE UNITED STATES DISTRICT COURT**  
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

FILED  
2012 FEB - 9  
U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
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JCS

11 MONTBLANC-SIMPLO GmbH, a German  
Corporation,

12 Plaintiff,

13 vs.

14 GOOGLE, INC., a Delaware Corporation., and  
DOES 1-100.

15 Defendants.

EV12 0626

COMPLAINT IN EQUITY FOR BILL OF  
DISCOVERY

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18  
19 Plaintiff MONTBLANC-SIMPLO GmbH, a German Corporation, ("Montblanc" or  
20 "Plaintiff"), by and through its attorneys, hereby brings this Complaint in Equity for a Bill of  
21 Discovery against Google, Inc. (hereinafter "Google" or "Defendant") and Does 1 through 100  
22 based on the following allegations:

23 **NATURE OF THE ACTION**

24 1. Montblanc is a leading purveyor of luxury watches, writing instruments, jewelry,  
25 and leather goods. Montblanc owns rights in the world-famous MONTBLANC trademark in  
26 numerous countries worldwide, including in the United Kingdom and United States. This is a  
27 Complaint in Equity for a Bill of Discovery, wherein Montblanc seeks information and  
28 documents solely in Google's possession that will provide the identity of currently unknown  
individuals or entities who have advertised with Google UK Limited ("Google UK"), a

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1 subsidiary or affiliate of Google, to sell counterfeit goods bearing the MONTBLANC trademark  
2 (the “Advertisers”). Montblanc seeks this information to allow it to enforce Montblanc’s  
3 trademark rights in its MONTBLANC trademark. Specifically, the Advertisers have purchased  
4 and posted keyword advertising from Google UK that linked to copycat websites of the official  
5 Montblanc websites selling counterfeit Montblanc merchandise. Google UK Ltd. has  
6 represented that the identity of such Advertisers is maintained solely by Google, Inc. and that it  
7 has no access to such information.

8           2. As further set forth below, Montblanc has attempted to determine the identity of  
9 the Advertisers through numerous alternative means, with no success. Because the identity of the  
10 Advertisers is in the exclusive possession of Google, and Montblanc has no other source from  
11 which to obtain the requested information, Montblanc has no choice but to file this Complaint in  
12 Equity for a Bill of Discovery in order to enforce its trademark rights. Once Montblanc has  
13 identified the Advertisers through this Bill of Discovery against Google, it intends to file a  
14 lawsuit to enforce its trademark rights against the identified Advertisers. Without the requested  
15 information, however, Montblanc does not know who the Advertisers are and therefore does not  
16 know whom it needs to sue to enforce its trademark rights.

### 17 PARTIES

18           3. Montblanc is a corporation organized and existing under the laws of Germany,  
19 with an office and principal place of business at Hellgrundweg 100, Hamburg, Germany, 22525.

20           4. On information and belief, Google is a Delaware corporation with a corporate  
21 headquarters located at 1600 Amphitheatre Parkway, Mountain View, CA 94043, which at all  
22 relevant times mentioned herein conducted business within the State of California. On further  
23 information and belief, Google offers a number of Internet-based services, the primary one of  
24 which is an Internet search engine, which allows users to enter search terms to locate relevant  
25 websites. Google also sells advertising on its website using proprietary technology whereby  
26 advertisers purchase keywords, and their advertisements appear as “Sponsored” advertisements  
27 when a user types in the purchased keywords.

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1           5.       The true names and capacities, whether individual, corporate, or otherwise, of  
2 Defendants Does 1 through 100 are presently unknown to Plaintiff, who, therefore brings this  
3 Complaint by such fictitious names. At such time as the true names and capacities of Does 1 to  
4 100 have been ascertained, Plaintiff will seek leave of Court to amend this Complaint  
5 accordingly. On information and belief, Plaintiff alleges that each of Does 1 through 100 was  
6 the agent, representative, employee, affiliate, subsidiary, and/or parent entity of each of the other  
7 Defendants and was acting at all times within the scope of its agency or representative capacity,  
8 with the knowledge and consent of the other Defendants, and that each of Does 1 through 100  
9 have the information and/or one or more of the documents that Plaintiff seeks as alleged herein.

#### **JURISDICTION**

11           6.       This is a Complaint in Equity for a Bill of Discovery seeking information and  
12 documents for use in prospective litigation Montblanc intends to file to enforce its trademark and  
13 other proprietary rights in the United Kingdom and/or other jurisdictions as required, including  
14 the United States. Jurisdiction arises under 28 U.S.C. § 1332 because the underlying trademark  
15 matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is  
16 between citizens of a State, namely California, and a citizen of a foreign state, namely Germany.

#### **INTRADISTRICT ASSIGNMENT**

18           7.       Because this is a discovery matter primarily related to an intellectual property  
19 dispute, assignment of this matter District-wide is appropriate.

#### **VENUE**

21           8.       Venue is proper in this District under 28 U.S.C. § 1391 because, on information  
22 and belief, Defendant's principal place of business is located in Santa Clara County. On further  
23 information and belief and as represented to Montblanc by Google, the documents in  
24 Defendant's possession sought by Plaintiff are primarily located in Santa Clara County.

#### **FACTUAL ALLEGATIONS**

##### **Background on Montblanc**

27           9.       Montblanc is a world famous company that engages in the design, manufacture,  
28 and sale of luxury watches, writing instruments, jewelry, leather goods, and related accessories

1 under the trademark MONTBLANC. The MONTBLANC trademark is most widely known for  
2 high quality writing instruments, although since being founded in 1906, Montblanc has used the  
3 MONTBLANC trademark in relation to numerous other goods, including ink, writing instrument  
4 refills, watches, leather goods such as wallets, purses, portfolios, and note pads, jewelry, and a  
5 wide range of related accessories. As such, the MONTBLANC name is one of the world's most  
6 well-known trademarks and would be associated with the Plaintiff and its high quality products  
7 by almost all consumers worldwide.

8 10. Montblanc owns numerous trademarks for the MONTBLANC mark in many  
9 countries (hereinafter referred to as the "Trademarks"), including:

- 10 a. U.K. Registered Trademark no. 1271649, filed on July 18, 1986, and is  
11 registered in Class 16 for "*Writing and drawing instruments, stationery;  
12 inks and erasers, all included in Class 16; parts and fittings included in  
13 Class 16 for all the aforesaid goods*";
- 14 b. U.K. Registered Trademark no. 2285024, filed November 7, 2001, and is  
15 registered in respect of goods in Class 16: "*Fountain pens; ball point  
16 pens; pencils; felt-tip pens; rollerballs; document markers; pouches for  
17 writing instruments; gift cases for writing instruments; inks and refills;  
18 note paper; writing paper; diaries; organisers; paperweights; pen and  
19 pencil holders.*"

20 11. As a result of Montblanc's extensive events, promotions, exhibits, and advertising  
21 worldwide, the MONTBLANC mark has an unparalleled reputation attached to it and represents  
22 extraordinary valuable goodwill owned by Montblanc. MONTBLANC is a well-known mark in  
23 the United Kingdom, the United States, and elsewhere.

24 12. Montblanc owns a website at [www.montblanc.com](http://www.montblanc.com), which routes onto numerous  
25 different Montblanc country websites.

#### 26 **Google and its AdWords Program**

27 13. On information and belief, Google provides Internet search, cloud computing, and  
28 advertising technologies to users via its website [www.google.com](http://www.google.com). On further information and

1 belief, Google is affiliated with its United Kingdom counterpart, Google UK, whose  
2 [www.google.co.uk](http://www.google.co.uk) website dominates the UK search engine market.

3 14. On information and belief, the purpose of a search engine is to enable Internet  
4 users to find webpages relevant to the search terms entered by the Internet user. On further  
5 information and belief, Google's search engine software analyzes the "quality" of relevant  
6 websites in determining how to rank and generate "natural" search results. On information and  
7 belief, Google also offers advertising space in the search results, which enables an advertiser to  
8 bid to have its website listed alongside the natural search results based on the words typed in by  
9 the user in the Google search engine. This advertising program is called "Google AdWords."

#### 10 The Underlying Activity Complained Of

11 15. On July 28, 2011, Montblanc became aware that a search for MONTBLANC  
12 PENS on the [www.google.co.uk](http://www.google.co.uk) search engine led to a sponsored ad for the website  
13 [www.pens.co.uk](http://www.pens.co.uk). While the text of the ad stated: "*£79 Montblanc© Pens Sale – Official*  
14 *Shop@Authentic, 79% off;*" [www.pens.co.uk](http://www.pens.co.uk) does not sell Montblanc pens and had not bid for  
15 the keyword MONTBLANC, nor was it responsible for the sponsored ad. The URL listed in the  
16 advertisement appeared to be [www.pens.co.uk](http://www.pens.co.uk), but the sponsored ad was linked to the website  
17 [www.cerinfobaw.info](http://www.cerinfobaw.info).

18 16. On further investigation, Montblanc became aware that numerous other examples  
19 of sponsored ads returned against the term MONTBLANC PENS when entered into  
20 [www.google.co.uk](http://www.google.co.uk), which linked to websites containing the "cerinfo" root in the same way. In  
21 each case, the sponsored ad purported to be provided by a legitimate third party website:  
22 variously, [www.penspens.com](http://www.penspens.com), [www.pencilix.com](http://www.pencilix.com), [www.officedepot.com](http://www.officedepot.com), as well as  
23 [www.pens.co.uk](http://www.pens.co.uk). The Advertisers even used Montblanc's own [www.montblanc.com](http://www.montblanc.com) in one  
24 such ad. On information and belief, each of these advertisements had been purchased by the  
25 same party, an Advertiser.

26 17. Montblanc's further research revealed that, according to a WHOIS report, there  
27 were 1,402 domain names incorporating the "cerinfo" root (the "Cerinfo Domains"), all  
28 registered to the same individual. These domain names were registered sequentially, using the

1 alphabet to distinguish them, for examples, [www.cerinfoaaa.info](http://www.cerinfoaaa.info), [www.cerinfoaab.info](http://www.cerinfoaab.info),  
2 [www.cerinfo.aac.info](http://www.cerinfo.aac.info) and so on. Some of the websites at the domain names have limited  
3 content, while some link to websites offering third party goods.

4 18. Montblanc discovered that if the URLs were copied into another format, for  
5 example an Excel document, they linked to a series of websites using the “mont-blancpen” or  
6 “mont-blanc-pen” root, which belonged to the co.cc domain (“the Mont-Blanc Domains”).  
7 There were numerous permutations of this root, also using the alphabetic sequence, for example,  
8 [www.mont-blancpenaa.co.cc](http://www.mont-blancpenaa.co.cc), [www.mont-blancpenab.co.cc](http://www.mont-blancpenab.co.cc), and so on. Montblanc was therefore  
9 able to establish that the Cerinfo Domains were related to the Mont-Blanc Domains.

10 19. The websites at the Mont-Blanc Domains mimic Montblanc’s official English  
11 website at [www.montblanc.com](http://www.montblanc.com). The websites at the Mont-Blanc Domains are clearly intended  
12 to suggest to Internet users that they are on the official website of Montblanc. However, the  
13 Mont-Blanc Domains offer and sell counterfeit goods bearing Montblanc’s Trademarks.

14 20. While, initially the sponsored ads linked to the blank Cerinfo Domains,  
15 Montblanc soon became aware that certain sponsored ads were linking directly to the website at  
16 the Mont-Blanc Domains. Therefore, rather than simply going to a “cerinfo.info” webpage that  
17 was blank, the link would lead to another website with the co.cc domain with the root  
18 “montblancpen” or “mont-blanc-pen” that had the appearance of being the official website,  
19 including through the URL which incorporates the mark MONTBLANC. A user would easily  
20 think that they had been routed to Montblanc’s official website through a legitimate sponsored  
21 ad.

22 21. In summary, the process is as follows: (1) an Internet user types the search term  
23 MONTBLANC PEN into [www.google.co.uk](http://www.google.co.uk); (2) The search results include a sponsored ad for  
24 the product, apparently linking to a third party website, for example, [www.staples.com](http://www.staples.com); (3)  
25 However, clicking on the sponsored ad leads to a website that has the appearance of being the  
26 official website of Montblanc, but is in fact a spoofed webpage, for example, at the URL  
27 [www.mont-blanc-peno.co.cc](http://www.mont-blanc-peno.co.cc).

1           22.     Montblanc has received numerous complaints from customers who purchased  
2 counterfeit pens from the Advertisers' websites believing them to be authentic, or from  
3 customers who have alerted Montblanc to the existence of the Advertisers' websites. The sale of  
4 counterfeit goods bearing Montblanc's marks, from websites that purported to be or are related  
5 to Montblanc, has caused Montblanc significant reputational and financial harm.

6                                   **Montblanc's Initial Communications with Google UK**

7           23.     Counsel for Montblanc has corresponded with Google UK numerous times  
8 regarding the misuse of the mark MONTBLANC within the AdWords program. These  
9 conversations date back to as early as September 9, 2011. When Montblanc complained of the  
10 infringing ads, Google UK indicated to Montblanc that they had removed the offending ads and  
11 had taken action against the Advertisers. Despite the action taken by Google UK, the sponsored  
12 ads linking to the spoofed Mont-Blanc Domains continue to appear when the search term  
13 MONTBLANC PENS is entered into [www.google.co.uk](http://www.google.co.uk).

14           24.     Since September 2011, the sponsored ads to the Mont-Blanc Domains have  
15 repeatedly reappeared, despite numerous complaints and purported action against the Advertisers  
16 by Google UK. The Advertisers have infringed and continue to infringe Montblanc's trademark  
17 rights by offering and selling counterfeit goods.

18           25.     As set forth above, Montblanc has actionable claims for trademark infringement  
19 against the Advertisers. Montblanc wishes to take further action against the Advertisers for this  
20 trademark infringement by naming the Advertisers as defendants in litigation, most likely in the  
21 United Kingdom but largely depending on where they are located and/or do business. However,  
22 because Montblanc cannot ascertain the identity of the Advertisers, it does not know yet whom  
23 to sue.

24                                   **Information Held by Google**

25           26.     Montblanc believed that Google UK held the information necessary to determine  
26 the identity of the Advertisers since the advertisements at issue were from the [www.google.co.uk](http://www.google.co.uk)  
27 website. Accordingly, Montblanc believed that the Advertisers would have provided both  
28

1 contact and financial details to Google UK, which would allow Montblanc to ascertain the  
2 Advertisers' true identity.

### 3 **Montblanc's Subsequent Communications with Google UK**

4 27. On October 3, 2011, Counsel for Montblanc sent an email to a member of the  
5 Google Advertising Legal Support Team requesting that Google UK send information  
6 identifying the Advertisers, including their location. Counsel received a response on that same  
7 day, stating: "*For privacy reasons, we cannot reveal information about other advertisers without*  
8 *a court order.*"

### 9 **Norwich Pharmacal Order Against Google UK**

10 28. On October 25, 2011, Montblanc applied for a Norwich Pharmacal Order against  
11 Google UK in the High Court Chancery Division for disclosure of the Advertisers' contact and  
12 financial details. Under English law, such an order allows the discovery of documents and  
13 information from a third party, without the need to actually file an action against the person from  
14 whom the discovery is sought, much like a Bill of Discovery such as this instant action.  
15 *Investors Mortgage Ins. Co. v. Dykema*, 598 F. Supp. 666, 668 (D.C. OR 1984) (citing 1  
16 *Pomeroy, Equity Jurisprudence* (4th ed. 1918 § 192 at 265)).

17 29. In response to this Application for a Norwich Pharmacal Order of the Chancery  
18 court, Google UK disclosed to Montblanc that it did not have the requested information, but  
19 rather that the information was in the sole possession of Google, Inc. After several discussions  
20 between counsel for Montblanc and Google to discuss the provision of the requested documents,  
21 Montblanc withdrew its Application for a Norwich Pharmacal Order, and on or about December  
22 16, 2011, Counsel for Google emailed Counsel for Montblanc, and indicated that it would be  
23 prepared to provide the information sought pursuant to a Bill of Discovery, provided that a  
24 protective order would be put in place prior to Google's compliance. Montblanc's withdrawal of  
25 its Norwich Pharmacal Order was made in reliance on Google's representation that it would  
26 cooperate with a Bill of Discovery in the Northern District of California under an appropriate  
27 protective order. Montblanc is also aware of additional websites for which the Advertisers  
28 appear to have purchased advertising from Google and through which the Advertisers are selling



1 counterfeit goods. These additional websites were not included in the original Norwich  
2 Pharmacal application but appear to be connected to Advertisers and may shed additional light  
3 on the identity of the Advertisers. These additional domain names are therefore also subject to  
4 this Bill of Discovery.

5 **Summary of Documents Sought**

6 30. Plaintiff seeks an order for disclosure of the following information:

- 7 a. All documents relating to the identity and unlawful activities of the party  
8 or parties who have purchased the relevant terms within the Google  
9 AdWords program to place the sponsored links and domain names listed  
10 at Exhibit A to this Complaint, including, without limitation:
- 11 i. Contact information provided by that party or parties to facilitate  
12 bidding for those terms as keywords and/or use of those terms in  
13 ad text by that party; and
- 14 ii. Financial information, including details of any bank accounts  
15 and/or credit cards, provided by that party or parties to facilitate  
16 the bidding for those terms and use of those terms in ad text by that  
17 party or parties.

18 31. The basis upon which these documents are requested is detailed herein.

19 **COUNT I: BILL OF DISCOVERY**

20 32. The allegations contained in paragraphs 1 through 31 are hereby realleged as if  
21 fully set forth herein.

22 33. Montblanc is the owner of Trademarks for MONTBLANC for a variety of luxury  
23 goods, including luxury watches, writing instruments, jewelry, leather goods, and related  
24 accessories, in the United Kingdom, the United States, and in other countries.

25 34. On information and belief, the Advertisers advertised on the Google UK website,  
26 infringed upon Montblanc's Trademarks, misappropriated the goodwill in Montblanc's  
27 Trademarks, and sold counterfeit MONTBLANC goods on the Internet.

28 35. Montblanc seeks to name the Advertisers as defendants in litigation.

1           36.     Montblanc does not know the Advertisers' true identity.

2           37.     Montblanc has made numerous attempts to uncover the Advertisers' identity, but  
3 has been unsuccessful.

4           38.     First, Montblanc conducted WHOIS searches, but discovered that the addresses  
5 provided therein were false.

6           39.     Second, Montblanc authorized an investigations company to make a test purchase  
7 from the Advertisers' websites in order to confirm that the goods offered and sold were  
8 counterfeit. Montblanc received these goods and confirmed that they were counterfeit.

9           40.     Third, Montblanc further engaged Chinese counsel and instructed it to investigate  
10 the companies to which payment was made for the above-referenced sale, but they were unable  
11 to find any further information about the companies.

12          41.     Fourth, Montblanc sent cease and desist correspondence and issued take down  
13 requests, though none of these options has resulted in successfully stopping the Advertisers'  
14 infringing activities.

15          42.     Montblanc seeks to obtain the contact and financial details of the Advertisers to  
16 allow it to identify the Advertisers so that it can take further action against the Advertisers for  
17 trademark infringement.

18          43.     Google has indicated that it has contact and financial details of the Advertisers in  
19 its possession. As Google appears to be the only entity that has access to the requested  
20 information, Montblanc has no option but to seek this Bill of Discovery from Google.

21          44.     As a result, Montblanc has no other adequate means of identifying and  
22 commencing an action against the Advertisers without obtaining information and documents  
23 from Google pursuant to the requested Bill of Discovery. Montblanc does not believe, nor does  
24 it currently assert, that Google bears any liability for the complained of advertisements made by  
25 the Advertisers.

26          45.     The disclosure of the information and documents in Google's possession will  
27 allow Montblanc to assert its rights against the wrongdoer, the Advertisers, and that, under the  
28 circumstances, it is just, convenient, and in the interests of justice to make the order.



EXHIBIT A

Websites for Disclosure

GOOGLE	KEYWORD	AD TITLE	TRACKING URL	SPOOFED URL	ACTUAL PAGE
.CO.UK	MONTBLANC	£79 Montblanc® Pens Sale	<p>http://www.google.co.uk/acik?sa=L &amp;ai=CxCISSfeXTTSZECsfhQexkqHUC9 2spKsC_YqJrR_X_903ERABKARQuDL qoP7____AWC7vq6D0ArIAQGpAhig 92jgCYU- qgQdT9CdwFRDPGnvSc1PNqNzA3Lh w5B8MfvkvZb7J06BRMIXYDvzuXnq wIVRjhCh0bajFCyglJA&amp;num=2&amp;rct =j&amp;q=montblanc&amp;ei=3feXTOWeD8a whAeb1MWRBA&amp;sig=AOD64_26Zf8 Rpp1BbR- 3MLa7cS6ASpc_A&amp;sqj=2&amp;ved=0CB MQ0Qw&amp;adurl=https://www.cerinfo bdb.info&amp;cad=rja</p>	www.wiley.com/OfficialMontblanc	MONT-BLANC-PENS.CO.CC
.CO.UK	MEISTERSTUCK	£79 Montblanc® Pens Sale	<p>http://www.google.co.uk/acik?sa=L &amp;ai=Cr- mLBQmYTujMBy_POAWfvKWWAZs pKsC_YqJrR_qvwqRCBAbKAhQuDLqo P7____AWC7vq6D0ArIAQGpAhig92 jgCYU- qgQdT9Be_UfzzNwuxZu5ZcoeBk1oV F5kEQZl1b1bco&amp;num=1&amp;sig=AOD6 4_0P7KRW6X2LcC5Oca7x3RSpo2Hm oA&amp;ved=0CagQ0Qw&amp;adurl=https:// www.cerinfobdb.info&amp;rct=j&amp;q=meis terstuck&amp;cad=rja</p>	www.wiley.com/OfficialMontblanc	MONT-BLANC-PENS.CO.CC
.CO.UK	MEISTERSTUCK	£79 Montblanc® Pens Sale   wiley.com	<p>http://www.google.co.uk/acik?sa=L &amp;ai=CcISn8wrmTYvKX8ae8AO9z5yv Bt2spKsC_YqJrR_qvwqRCAGAEAFQuD LqoP7____AWC7vq6D0AqQAQJIAQ GpAhig92jgCYU- qgQdT9CM4HZybaFNxkCK8r_Z0ftQt</p>	www.wiley.com/OfficialMontblanc	MONT-BLANC-PENS.CO.CC

.CO.UK	MONTBLANC	<p><u>£79 Montblanc® Pens Sale   reed.co.uk</u></p>	<p>ORH3HJnplSmjA&amp;sig=AOD64_1GjokU3EsmoimIBAS7Cfc6Ep4r1g&amp;ved=0CAGQ0Qw4Cg&amp;adurl=https://www.cerinfofobdn.info&amp;rct=j&amp;q=meisterstuck&amp;cad=rja</p>	<p><a href="http://www.reed.co.uk/Official/Montblanc">www.reed.co.uk/Official/Montblanc</a></p>	MONT-BLANC-PENV.CO.CC
.CO.UK	MEISTERSTUCK	<p><u>£79 Montblanc® Pens Sale   reed.co.uk</u></p>	<p>http://www.google.co.uk/acik?sa=L&amp;ai=Cg3sw_CbT0a2NMFCOAW8gumYAum7m4EDofTXyD6zupCwEQGAEAEOA1CNg7mr-8BYLU-roPQCsgBAakCBQil0j0MhT6qBB1P0PCSRWeAMTLxP3j3Uuw0gv9hNeGWkgt7ComxLoFEWjWYkYr-rAhUJfInwKHd8Vw1JKBQA&amp;rct=j&amp;q=montblanc&amp;ei=v_CbTpbTmOWs8gPf4zGBQ&amp;sig=AOD64_3yEi8An8vQsdJuwWClqpxhVXnXA&amp;sqi=2&amp;ved=0CAGQ0Qw&amp;adurl=https://www.cerinfofobdn.info&amp;cad=rja</p>	<p><a href="http://www.reed.co.uk/Official/Montblanc">www.reed.co.uk/Official/Montblanc</a></p>	MONT-BLANC-PENV.CO.CC

.CO.UK	MONTBLANC	£79 Montblanc® Pens Sale   penguin.co.uk	<p>http://www.google.co.uk/acik?sa=L&amp;ai=CBTDArnOdTVZDwbWvEB42Uj1f8FzIK1mwlk7eXSI9C-hwgiABACKANQLe- a5vz_____AWC7vq6D0ArIAQGpAhig92JgCYU-qgQd19D0naD-UpA6xi9mOlziXkaGu5Rn7cmY7Pwar2y68RMlqsKf56DyqwVvyUvhCh2YC8STygUA&amp;rct=j&amp;q=montblanc&amp;ei=rXOdTuq3O8mXhQeYI5CeCQ&amp;sig=AOD64_0JUGE5_kztBI07fc8-uV87taZpF5A&amp;sqi=2&amp;ved=OCBEQDQw&amp;adurl=https://www.cerinfobdp.info&amp;cad=rja</p>	www.penguin.co.uk/OfficialMontblanc	MONT-BLANC-PENAB.CO.CC
.CO.UK	MONTBLANC	- 75% Off Mont Blanc Pen   pensstore.co.uk	<p>http://www.google.co.uk/acik?sa=L&amp;ai=ChW5yS26dTVcZLm8hAegsjKBbGE-YED2fLkzj6ynOoVCAQAQyGDUJIERo7_____wFgu76ug9AKyAEBqQjPKC_7e4W6PqoEFk_QctsNYrn44ppy-b_1A0EgOrdit-m6BRMlvsbqoZvyqwVIBnhCh1gMIK-RygUA&amp;rct=j&amp;q=montblanc&amp;ei=S26dTV70KpSzhAfg4LyNCQ&amp;sig=AOD64_21pdajjCGkXXlb_dw48BCVl-EF5g&amp;sqi=2&amp;ved=OCBYQ0Qw&amp;adurl=http://www.pensstore.co.uk&amp;cad=rja</p>	-	PENSTORE.CO.UK
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