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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

LOUIS VUITTON MALLETIER, S.A.,

Plaintiff,

vs.

AKANOC SOLUTIONS, INC., et al.,

Defendants.

) Case No.: C 07-3952 JW (HRL)

)
)
) **DEFENDANTS' MOTION IN LIMINE #2**
) **TO EXCLUDE INTERNET MATERIAL**
) **AND TESTIMONY ABOUT INTERNET**
) **MATERIAL**

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1 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

2 Defendants Akanoc Solutions, Inc., Managed Solutions Group, Inc. and Steve Chen
3 (“Defendants”) move for an order, in limine, precluding Plaintiff Louis Vuitton Malletier from
4 offering in evidence of any material from the Internet¹ and any testimony about material from the
5 Internet. This motion is set for hearing on March 23, 2009.

6 Defendants move the Court to exclude Internet material and testimony about Internet
7 material on the grounds that (1) Vuitton cannot authenticate Internet material as required by Fed. R.
8 Evid. 901, (2) Internet material and any testimony about Internet material is inadmissible hearsay
9 under Fed. R. Evid. 801 and 802; and (3) Internet material is highly prejudicial, misleading and
10 therefore inadmissible under Fed. R. Evid. 403.

11 **I. AN ORDER IN LIMINE IS PROPER TO EXCLUDE BOTH MATERIAL**
12 **COLLECTED FROM THE INTERNET AND TESTIMONY ABOUT MATERIAL**
13 **COLLECTED FROM THE INTERNET**

14 A motion in limine is “any motion whether made before or during trial to exclude anticipated
15 prejudicial evidence before the evidence is actually offered.”² Obtaining a discretionary advance
16 ruling on the admission of specific evidence or resolving critical evidentiary issues at the outset
17 enhances the efficiency of the trial process.³ Authority is also implied from “the district court’s
18 inherent authority to manage the course of trials.”⁴

19 Defendants anticipate that at trial Vuitton will attempt to introduce into evidence material
20 from the Internet and testimony about material from the Internet. Internet material is inadmissible
21 because it cannot be authenticated, because it is hearsay and because it is highly prejudicial and
22 misleading. Any testimony about material from the Internet is also inadmissible as double hearsay
23 or worse.

24
25 ¹A list of proposed Plaintiff’s exhibits that Defendants move the Court to exclude is attached as
Exhibit “A.”

26 ²*Luce v. United States*, 469 U.S. 38, 40, 105 S. Ct. 460, 83 L. Ed. 2d 443 (1984).

27 ³*In re Japanese Electronic Products Antitrust Litig.*, 723 F.2d 238, 260 (3d Cir. 1983), *rev’d on*
other grounds, 475 U.S. 574 (1986).

28 ⁴*Luce*, 469 U.S. at 41 n.4; *United States v. Holmquist*, 36 F.3d 154, 163 (1st Cir. 1994).

1 **II. MATERIAL FROM THE INTERNET IS INADMISSIBLE**

2 **A. Internet Material Cannot Be Authenticated**

3 Any Internet material should be excluded from evidence because Vuitton cannot authenticate
4 such material as required by Fed. R. Evid. 901. Authentication is a condition precedent to
5 admissibility and is satisfied only by evidence sufficient to show that the matter in question is what
6 its proponent claims. Vuitton listed as hundreds of exhibits material printed from the Internet that
7 allegedly depicts the contents of various Internet websites, including websites that Vuitton alleges
8 sell infringing products and websites that display “WHOIS” data or hosting history. But Vuitton
9 cannot properly authenticate any such material and the Court should exclude it from evidence
10 because it is completely unreliable.

11 Fed. R. Evid. 901(a) requires a proponent to show that material from the Internet is authentic
12 before such material can be admitted as evidence. *Williams v. Long*, 585 F. Supp. 2d 679 (D. Md.
13 2008). Rule 901(a) provides that “the requirement of authentication or identification as a condition
14 precedent to its admissibility is satisfied by evidence sufficient to support a finding that the matter in
15 question is what its proponent claims.” The methods of authentication that satisfy the authentication
16 requirement of Rule 901(a) are enumerated in Rule 901(b). Vuitton, however, cannot utilize any of
17 these methods to authenticate any of the material displayed on the Internet that it will attempt to
18 introduce.

19 Rule 901(b)(1) provides that testimony of witnesses with personal knowledge is a proper
20 method of authenticating evidence. But Vuitton has no witness with personal knowledge of the
21 Internet material that it might attempt to introduce. It is not enough for the person who viewed or
22 printed out the material to authenticate it. Someone with personal knowledge of the accuracy of the
23 *contents* of the Internet material must testify. *Internet Specialties West, Inc. v. ISPWest*, No. CV 05-
24 3296 FMC AJWx, 2006 WL 4568796 at *1-2 (C.D. Cal. Sept. 19, 2006).

25 [M]ost of plaintiff’s arguments are addressed to print-outs from
26 websites and the question of their admissibility. Plaintiff properly
27 contends that these print-outs are inadmissible unless properly
28 authenticated. **Defendant’s argument, that they could be
“authenticated” by the person who went to the website and
printed out the home page, is unavailing.** It is now well recognized
that “Anyone can put anything on the Internet. No website is

1 monitored for accuracy and nothing contained therein is under oath or
2 even subject to independent verification absent underlying
3 documentation ... hackers can adulterate the content on any web-site
4 from any location at any time. For these reasons, **any evidence
5 procured off the Internet is adequate for almost nothing....**”

6 To be authenticated, someone with **knowledge** of the **accuracy of the
7 contents** of the **internet print-outs** must testify. [Emphasis added;
8 citation omitted.]

9 Testimony from someone with knowledge of the accuracy of the Internet material is
10 necessary for authentication because the Internet “is one large catalyst for rumor, innuendo and
11 misinformation.” *St. Clair v. Johnny’s Oyster & Shrimp, Inc.*, 76 F. Supp. 2d 773, 774 (S.D. Tex.
12 1999). Admitting such evidence without such testimony would be tantamount to “relying on the
13 voodoo information taken from the Internet.” *Id.*

14 The testimony of Vuitton’s witnesses, Nicolay Livadkin and Robert Holmes, cannot
15 authenticate Internet material, which may be altered by anyone, at any time, from anywhere.
16 Because Internet material is essentially anonymous, can easily be faked, is well known to be subject
17 to scams, frauds and errors, and because it is so easy to alter material on the Internet, personal
18 knowledge of the accuracy of the content of material is especially essential to authenticate any
19 material from the Internet. Neither Livadkin nor Holmes has such personal knowledge and without
20 proper authentication, this material should not be admitted at trial. Vuitton’s witnesses also do not
21 have personal knowledge of who printed the Internet material. Holmes repeatedly testified that he
22 did not even have personal knowledge of who created the printed Internet material. Some examples
23 of Holmes’ lack of personal knowledge are:

24 “I’m not familiar with the printout itself; but again it looks like any
25 one of thousands of websites that I may have investigated.”⁵

26 “To tell you that I remember a specific search would be impossible.”⁶

27 “I could not tell you for sure if I saw this printout before.”⁷

28 “If I saw this specific printout would be impossible to say.”⁸

⁵Lowe Decl. ¶5, **Exhibit “1512”** Deposition of Robert Holmes (“Holmes Depo.”) 55:17-19.

⁶*Id.* at Holmes Depo. 56:20-21.

⁷*Id.* at Holmes Depo. 58:19-20.

⁸*Id.* at Holmes Depo. 59:21-22.

1 Livadkin also testified that he did not know who printed the Internet material:

2 Q: Did you print this out?
A: Nope.⁹

3 Q: Did you do this printout?
4 A: I don't remember.¹⁰
5 Q: You did not print this information, did you?
A: It doesn't seem like it has been me.¹¹

6 Q: This was also not printed by you or at your office?
7 A: I don't think so.¹²

8 **B. Computer Generated Material Cannot Be Authenticated By Vuitton's Witnesses**

9 Vuitton's witnesses also lack personal knowledge that the process of creating the Internet
10 material is itself accurate. Under Fed. R. Evid. 901(b)(9), computer results must be authenticated by
11 "evidence describing a process or system used to produce a result and showing that the process or
12 system produces an accurate result" is *In Re Vee Vinhnee*, 336 B.R. 437, 446 (B.A.P. 9th Cir. 2005)
13 (citing advisory committee notes to Rule 901(b)(9)). In *Vee Vinhnee*, the Court held that American
14 Express' computerized credit card debt records were inadmissible because they were not properly
15 authenticated. *Id.* at 450. There, American Express' own custodian of records testified that "I
16 couldn't testify to exactly what the model [of computer] is or anything like that. It's . . . our
17 computer system that we've used for, you know, quite some time to produce the documents, to
18 gather the information, to store the information and then, you know, to produce the statements to the
19 card members. And we, you know, it's highly accurate." *Id.* at 447. This testimony was not enough
20 to authenticate American Express' computer material. *Id.* at 450.

21 Vuitton cannot authenticate its Internet material because its witness testimony is even *weaker*
22 than American Express' witness testimony. Like American Express' records custodian, Vuitton's
23 witnesses can do nothing more than assert a baseless opinion that their Internet material is accurate.
24 But unlike the records custodian, they are not even employed by the organization that created the

25 _____
26 ⁹Lowe Decl. ¶4, Exhibit "1511" Deposition of Nicolay Livadkin ("Livadkin Depo.") 100:15-16.

27 ¹⁰*Id.* at Livadkin Depo. 133:9-10.

28 ¹¹*Id.* at Livadkin Depo. 118:20-21.

¹²*Id.* at Livadkin Depo. 133:18-20.

1 material, meaning there is no *possible chance* that they would have personal knowledge of the
2 material's accuracy. If American Express' *own employee* could not authenticate American Express'
3 own computer records with his superficial statement that the records were "highly accurate," there is
4 no way that Vuitton's witnesses can authenticate Internet material of *unrelated third parties* with
5 similarly baseless testimony.

6 Besides not having personal knowledge, Vuitton also cannot employ any other types of
7 authentication listed in Rule 901(b). These are: non-expert opinion on handwriting, comparison by
8 trier or expert witness, distinctive characteristics and the like, voice identification, telephone
9 conversations, public records or reports, ancient documents or data compilation, process or system or
10 methods provided by statute or rule. None of these types of authentication under Rule 901(b) apply
11 to authenticate the material from the Internet or computer material that Vuitton will attempt to
12 introduce. Vuitton cannot offer any testimony based on personal knowledge to authenticate any
13 material from the Internet. This material, therefore, should be excluded.

14 **C. Material From the Internet is Not Self-Authenticating Under Fed. R. Evid. 902**

15 Any Internet material that Vuitton may attempt to introduce into evidence is not self-
16 authenticating under Fed. R. Evid. 901 because it does not fall into any of the categories of self-
17 authenticating evidence listed in Rule 902.

18 In *Williams v. Long*, 585 F. Supp. 2d at 686, the Court held that material or printouts from
19 *government websites* is exceptional and is self-authenticating because the government creates and
20 vouches for it. But privately created Internet material is not self-authenticating. There are numerous
21 differences between material from government websites and the material that Vuitton seeks to
22 introduce. These differences illustrate why material from government websites is self-
23 authenticating, and Vuitton's Internet material is not.

24 The *Williams* Court noted that the purpose of the Rule 901(a) authentication requirement is to
25 ensure that "the matter in question is what its proponent claims" and that particular characteristics of
26 material from government websites would satisfy the purpose of Rule 901(a) because government
27 websites themselves are "publications purporting to be issued by public authority" under Fed. R.
28 Evid. 902(5). The government publications exception of Rule 902(5) is based on the assumptions

1 that government publications “seldom contain serious mistakes,” “are likely to be readily identifiable
2 by simple inspection” and “forgery or misrepresentation of such material is unlikely.” *Id.* at 686.
3 But the Internet material that Vuitton aims to introduce cannot be self-authenticating because *none*
4 of these three assumptions apply.

5 **First**, information on the Internet *oftentimes* contains serious mistakes. Anyone can place or
6 edit any information on the Internet. The material that Vuitton will attempt to introduce is from
7 Internet sites with no government affiliation and with no guarantee of veracity. Vuitton admits that
8 information on the Internet is *oftentimes* false.¹³ **Second**, the Internet material that Vuitton seeks to
9 introduce cannot be readily identifiable by simple inspection because much, if not all, of the material
10 no longer exists, is no longer accessible, or possibly has been modified or adjusted. **Third**, there is
11 no government oversight over the Internet material that Vuitton seeks to introduce and this material
12 can easily be forged or misrepresented. Vuitton’s Internet material is *not* self-authenticating for very
13 same reasons that material from government websites *is* self-authenticating. **Fourth**, Internet
14 material does not identify the source of the information or can easily misrepresent the source of the
15 information with no reliable way to determine the source or accuracy of the material. Internet users
16 are constantly warned against trusting website material because it is anonymous and can easily spoof
17 another entity with false URLs, forged identifying marks and false information. The prevalence of
18 false information on the Internet is so substantial that there are websites devoted to rebutting some of
19 the widely published “urban legends,” e.g., Snopes.com. Material from government websites is
20 inherently reliable and easily verified. Vuitton’s Internet material is *not* inherently reliable at all,
21 and therefore is not self-authenticating.

22 **III. INTERNET MATERIAL AND TESTIMONY ABOUT IT ARE BOTH HEARSAY**

23 Internet material and testimony about Internet material are both inadmissible under Fed. R.
24 Evid. 801 and 802 as hearsay, double hearsay, triple hearsay, and worse. There is no basis for
25 finding the information reliable or admissible and no way to confront or cross-examine it.

26
27 ¹³Lowe Decl. ¶4, **Exhibit “1511”** Livadkin Depo 115:12-21 (admitting that “WHOIS database could
28 be not reliable” and identifying WHOIS registrant information that “just . . . doesn’t make any
sense.”).

1 Vuitton has offered voluminous materials from the Internet, including printouts of Internet
2 websites displaying goods for sale, printouts of photos of allegedly counterfeit goods and printouts
3 of websites that allegedly list WHOIS data. Vuitton asserts that because it has printouts from the
4 Internet, the material on the Internet that it wants to introduce must be true. But these printouts are
5 nothing more than unauthenticated multiple hearsay and are separately inadmissible for that reason
6 under Fed. R. Evid. 801 and 802.

7 **A. Printouts Of Internet Websites Displaying Goods Are Inadmissible As Hearsay**

8 **1. Printouts of Internet Websites Are Inadmissible Under fed. R. Evid. 801
9 and 802**

10 Any printed material from Internet websites displaying goods are inadmissible as hearsay.
11 Hearsay is a statement, other than one made by the declarant while testifying at the trial, offered in
12 evidence to prove the truth of the matter asserted. Fed. R. Evid. 801(c). Hearsay is inadmissible.
13 Fed. R. Evid. 802. The Printouts from Internet websites are hearsay because they are offered for the
14 truth of their substantive content. *Williams*, 585 F. Supp. 2d at 685. No exception applies to make
15 the hearsay admissible.

16 **2. Printouts of Internet Websites Are Also Not Admissible Under Fed. R.
17 Evid. 803(6)**

18 Internet websites printouts also do not qualify under any of the business records hearsay
19 exceptions of Fed. R. Evid. 803(6). Under this exception, business records, even though they are
20 hearsay, may be admissible if the proper foundational requirements are met. They must be (1) made
21 or based on information transmitted by a person with knowledge at or near the time of the
22 transaction; (2) made in the ordinary course of business; and (3) trustworthy, with neither the source
23 of information nor method or circumstances of preparation indicating a lack of trustworthiness. Fed.
24 R. Evid. 803(6); *United States v. Catabran*, 836 F.2d 453, 457 (9th Cir. 1988).

25 Neither Holmes nor Livadkin, Vuitton's only witnesses, can lay the proper foundation for
26 Internet website printouts that Vuitton seeks to introduce. To be admitted under Rule 803(6), a
27 person with personal knowledge at or near the time of the transaction must testify. For instance,
28 testimony from someone who designed, built, implemented or entered the data that comprises a

1 website may lay the foundation for the website as evidence by testifying based on his or her personal
2 knowledge. In *Catabran*, 836 F.2d at 457-58, the Court held that a computer printout of a
3 company's general ledger could be admissible under Rule 803(6) based on the testimony by the
4 accountant who actually input the data into the ledger. Neither Holmes or Livadkin has such
5 personal knowledge. Holmes and Livadkin also cannot testify about whether the information on the
6 website was kept in the ordinary course of business or even whose business it is. Nor can they
7 testify about the trustworthiness of the printouts from Internet websites. Vuitton cannot satisfy any
8 of the three requirements of Rule 803(6) and therefore cannot establish the admissibility of these
9 otherwise anonymous records. The Internet documents created by unknown persons under unknown
10 circumstances are no more admissible than a random note found on a park bench.

11 **3. Printouts of Internet Websites Do Not Qualify For Admissibility Fed. R.
12 Evid. 803(8)**

13 While Fed. R. Evid. 803(8) provides an narrow exception to the hearsay rule for government
14 records and reports, Vuitton's website printouts do not qualify for admissibility under this rule. The
15 justification for the hearsay exception of Rule 803(8) "derives from the trustworthiness of the [public
16 record] documents themselves, having been made by a public office or agency." *Williams*, 585 F.
17 Supp. 2d at 690. None of the website printouts that Vuitton seeks to introduce have been made by a
18 public office or agency, and none of them have any degree of trustworthiness. Without these
19 characteristics, Vuitton's website printouts are not admissible under Rule 803(8).

20 **B. WHOIS Printouts From Internet Websites Are Inadmissible As Double Hearsay**

21 Vuitton has listed as exhibits printouts of websites that allegedly list WHOIS information or
22 hosting information about other websites. Like all material from the Internet, WHOIS information is
23 inadmissible hearsay and should be excluded from evidence. It is at least double hearsay.

24 WHOIS or hosting information purports to be information about websites that is input by an
25 individual or organization at the time they register a domain name. *Register.com, Inc. v. Verio, Inc.*,
26 356 F.3d 393, 396 (2d Cir. 2004). This includes such information as contact name, address, phone
27 number, fax number, email address, domain registrar and server information. *Id.* But the
28 information in a WHOIS database is inherently unreliable because there is no way to verify the

1 accuracy of the database **or** the accuracy of the domain registrant information that was anonymously
2 input by unknown parties. In other words, any website operator can intentionally input fake data
3 into a WHOIS database with no means of checking or correcting erroneous information. It is no
4 surprise that courts have specifically recognized WHOIS database information as particularly
5 unreliable. *See Cable News Network L.P., L.L.L.P. v. CNNNews.com*, 177 F. Supp. 2d 506, 526 (E.D.
6 Va. 2001) (recognizing that [Chinese company] Maya HK provided false contact information to the
7 WHOIS database when applying for the registration of a domain name); *Atlas Copco AB v.*
8 *Atlascopcoiran.com*, 533 F. Supp. 2d 610, 613 n.1 (E.D. Va. 2008) (recognizing that WHOIS
9 information that was “false and fictitious.”)

10 Courts have explained another reason why WHOIS information is inaccurate; WHOIS
11 information for a website is not always updated when the ownership of a website is transferred.
12 *Verizon California Inc. v. Navigation Catalyst Systems, Inc.*, 568 F. Supp. 2d 1088, 1097 (C.D. Cal.
13 2008) (“Defendants have not maintained proper ‘WHOIS’ data for all of their sites”); *Olympic*
14 *Sports Data Services, Ltd. v. Maselli*, No. 07-117, 2008 WL 5377626, at *1 (E.D. Pa. Dec. 22,
15 2008).

16 Vuitton’s designated Fed. R. Civ. P. 30(b)(6) witness Nicolay Livadkin admitted that the
17 “WHOIS database could not be reliable,” that a domain registrant who inputs inaccurate information
18 into the WHOIS database destroys the accuracy of the WHOIS database, and, consequently, a
19 Domain Tools printout is inaccurate. [Lowe Decl. ¶4, **Exhibit “1511”** Livadkin Depo 115:12-21]

20 Vuitton’s proposed exhibits include printouts from WHOIS search engines such as
21 <http://www.DomainTools.com> and <http://www.NetworkSolutions.com>, websites that Vuitton alleges
22 provide search results of the WHOIS information associated with individual websites. These
23 printouts, however are inadmissible triple hearsay. The information contained in them cannot be
24 verified by the Vuitton and they are being offered to prove the truth of the matter asserted (that the
25 IP address and hosting information from unknown sources on those printouts is true). *See* FED. R.
26 EVID. 802. These printouts are triple hearsay because Vuitton has admitted that it does not maintain
27 this data nor did Livadkin even generate the printouts himself. Unknown persons input information
28 based on unverified third party sources. Unknown persons then printed this information and gave it

1 to Mr. Livadkin who had no means of verifying any part of it. Now Mr. Livadkin wants to base his
2 testimony on this third or fourth hand material. Mr. Livadkin’s hearsay testimony would be based
3 on nothing better than anonymous notes left on a park bench. The testimony cannot be dignified by
4 use in court. These printouts are inadmissible hearsay pursuant to Fed. R. Evid. 802 and should be
5 excluded.

6 **C. Testimony About Material Collected From Or Displayed On The Internet Is**
7 **Inadmissible As Quadruple Hearsay**

8 Vuitton has also listed proposed exhibits purporting to be material collected from or
9 displayed on the Internet, but these exhibits and this testimony should be excluded because it is
10 quadruple hearsay.

11 In his Declaration in opposition to Defendants’ motion for summary judgment, for example,
12 Livadkin testified about particular domains and the IP addresses at which these domains were
13 allegedly hosted. For instance, he testified that the domain wendy929.net was hosted on IP address
14 205.209.163.83. [Lowe Decl. ¶5, **Exhibit “1511”** Livadkin Decl. ¶12] Holmes offered similar
15 testimony such as “I began investigating the website luxury2us.com at IP Address 204.16.193.105
16 which was offering suspect Louis Vuitton products. On or about that date, I confirmed that
17 luxury2us.com was being hosted by Akanoc Solutions.” [Lowe Decl. ¶6, **Exhibit “1512”** Holmes
18 Decl. ¶13] This type of testimony is allegedly based on (1) website printouts that (2) allegedly show
19 unverified information (3) input by another unknown person. This type of testimony is completely
20 unreliable three or four times removed from anyone with personal knowledge. This should be
21 excluded.

22 **IV. VUITTON’S INTERNET MATERIAL IS PREJUDICIAL**

23 The Court should also exclude the material from the Internet that Vuitton will seek to
24 introduce on the basis that it is unduly prejudicial. “Although relevant, evidence may be excluded if
25 its probative value is substantially outweighed by the danger of unfair prejudice, confusion of the
26 issues, or misleading the jury, or by considerations of undue delay, waste of time, or needless
27 presentation of cumulative evidence.” Fed. R. Evid. 403. Vuitton’s Internet material would violate
28 Fed. R. Evid. 403.

1 The Internet material that Vuitton will seek to introduce, including printouts of websites
2 allegedly selling counterfeit goods and listing WHOIS data, is unreliable and inherently prejudicial
3 because jurors will likely be excessively and unfairly influenced by such material if it is admitted.
4 The excessive weight given by laymen to material on the Internet is evidenced by the multitude of
5 scams, hoaxes and untruths that proliferate on the Internet solely because of some users' baseless
6 trust in the veracity of material appearing on a computer screen. If the Court admits the material that
7 Vuitton seeks to introduce, jurors are likely to think that it has been reviewed and confirmed as
8 reliable by a highly respected United States government official – this Court. So jurors would likely
9 accept the “truth” of those printouts at face value because of the implied verification by the Court.
10 Even a cautionary instruction could not eliminate this “halo” effect. Making things worse,
11 Defendants cannot mitigate this excessive prejudicial effect because there are no means of
12 establishing the falsity of this material, identifying the actual source of statements and cross-
13 examining them

14 Jurors will also be hopelessly misled if such material is admitted into evidence. Material on
15 the Internet is highly suspect by courts because anyone can put anything on the Internet at any time,
16 without any regard for veracity. For this reason, the printouts that Vuitton has listed as exhibits
17 should be excluded because they will mislead jurors. A juror, even if he or she is familiar with the
18 Internet, will tend to believe that any printout of a website, admitted into evidence by a judge, is
19 legitimate and accurate. The same rationale applies to the printouts of WHOIS or hosting search
20 data that Vuitton offers. While it is true that both courts and *Vuitton's own witness* have recognized
21 that WHOIS data is hearsay that is oftentimes false, a juror will not be able to determine the
22 accuracy of WHOIS data. Jurors will not have any knowledge of the inherent falsity of this
23 information, and instead will likely be misled by terms on the printouts that indicate trustworthiness,
24 such as “Records,” “Reports” and “Search Results.” Jurors would have no way to distinguish false
25 information from any “true” information.

26 The admissibility of Vuitton's Internet material is a crucial issue in this case. Without this
27 material, Vuitton's allegations of secondary copyright and trademark infringement will collapse. If
28 the Court admits this evidence that the Defendants have no means to challenge, it is likely that the

1 jury will be prejudiced and misled into giving the material excessive weight, putting the Defendants
2 at a significant and unfair disadvantage. Although the Defendants believe that much of the evidence
3 will be false, the Defendants will have no method of proving the falsity of such evidence. An
4 official looking “report” printed from a computer will easily trump the Defendants’ mere testimony
5 that they have nothing to do with particular websites.

6 The significance and highly prejudicial nature of this evidence requires the Court to
7 determine its admissibility of this evidence, not its weight. The Court should exclude the Internet
8 material that Vuitton will seek to introduce because there are three independent bases under the
9 Federal Rules of Evidence requiring exclusion. First, this Internet material is inadmissible hearsay
10 under Fed R. Evid. 802. Second, it is not authenticated as required by Fed. R. Evid. 901. Third, it is
11 highly prejudicial and misleading under Fed. R. Evid. 403.

12 **V. CONCLUSION**

13 Instead of going to the trouble of obtaining admissible evidence, Vuitton wants to shortcut
14 the fact finding process by offering unauthenticated and prejudicial hearsay because it is convenient
15 to do so. Vuitton could have deposed and used the testimony and records of Internet domain
16 registrars. Or Vuitton could have identified and used the records and testimony of the website
17 operators about whose products it complains. Or Vuitton could have obtained the records and
18 testimony of the Defendants’ customers. Vuitton could then have used deposition evidence. But
19 because doing so would require a proper investigation of primary sources, perhaps in other states and
20 countries, Vuitton chose to proceed in the case with two witnesses with no relevant personal
21 knowledge and no real expertise, relying on hearsay, speculation and conjecture. Vuitton’s lack of
22 serious effort to obtain admissible evidence suggests this Court is being misused to advance a
23 shakedown by a large international business rather than an effort to prove actual liability.

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1 Defendants move to exclude (1) any material collected from the Internet as highly
2 prejudicial, unauthenticated, inadmissible hearsay and (2) any testimony about Internet material as
3 inadmissible hearsay.

4
5 Dated: February 23, 2009

GAUNTLETT & ASSOCIATES

6
7 By: /s/James A. Lowe
8 David A. Gauntlett
9 James A. Lowe
Brian S. Edwards
Christopher Lai

10 Attorneys for Defendants
11 Akanoc Solutions, Inc.,
12 Managed Solutions Group, Inc.,
13 and Steve Chen
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Motion in Limine to Exclude Internet Material and Testimony about Internet Material

Exhibits to be Excluded

Ex. #	Description	Identified	Admitted
20	ARIN WHOIS Database Search Results for "akanoc" dated 4/8/08	4/8/2008	
21	Akanoc Solutions Inc. Service Agreement	4/8/2008	
22	Dediwebhost.com advertisement	4/8/2008	
23	Dediwebhost.com printout re company profile dated 4/8/08	4/8/2008	
24	Dediwebhost.com printout re managed services dated 4/8/08	4/8/2008	
25	ARIN Service Agreement	4/8/2008	
34	Document from ARIN WHOIS Database Search	4/9/2008	
63	Website www.wendy929.net 8/11/06		
63.1	Website www.wendy929.net 10/11/06		
63.2	Website www.wendy929.net 10/30/06		
63.3	Website www.wendy929.net 7/16/07		
63.4	Website www.wendy929.net 9/19/07		
64	Hosting history www.wendy929.net 10/16/06		
64.1	Hosting history www.wendy929.net 10/23/06		
64.2	Hosting history www.wendy929.net 10/30/06		
64.3	Hosting history www.wendy929.net 4/17/07		
64.4	Hosting history www.wendy929.net 9/19/07		
64.5	Hosting history www.wendy929.net 3/10/08		
68	Website www.ape168.com		
69	Hosting history www.ape168.com dated 3/10/08		
69.1	Hosting history www.ape168.com		
70	Website www.atozbrand.com		
71	Hosting history www.atozbrand.com dated 3/10/08		
71.1	Hosting history www.atozbrand.com		
72	Website www.bag925.com		
73	Hosting history www.bag925.com		
73.1	Hosting history www.bag925.com 3/10/08		
75	Website www.eshoes99.com 9/19/07		
75.1	Website www.eshoes99.com 10/23/07		
75.2	Website www.eshoes99.com 11/22/07		
76	Hosting History www.eshoes99.com		
76.1	Hosting History www.eshoes99.com 10/23/06		
76.2	Hosting History www.eshoes99.com 2/23/07		
76.3	Hosting History www.eshoes99.com 3/14/07		
76.4	Hosting History www.eshoes99.com 4/10/07		
76.5	Hosting History www.eshoes99.com 9/19/07		
76.6	Hosting History www.eshoes99.com 3/10/08		
77	Website www.315ec.com 8/29/07		
78	Hosting History www.315ec.com 8/29/07		
78.1	Hosting History www.315ec.com 9/19/07		

Motion in Limine to Exclude Internet Material and Testimony about Internet Material

Exhibits to be Excluded

78.2	Hosting History www.315ec.com 3/10/08		
79	Website www.Bag4sell.com 3/8/07		
79.1	Website www.Bag4sell.com 9/19/07		
80	Hosting History www.Bag4sell.com 3/8/07		
80.1	Hosting History www.Bag4sell.com 9/19/07		
80.2	Hosting History www.Bag4sell.com 3/10/08		
84	Website www.Bigworldshoes.com 11/14/07		
84.1	Website www.Bigworldshoes.com 1/27/09		
84.2	Website www.Bigworldshoes.com 1/28/09		
85	Hosting History www.Bigworldshoes.com 11/14/07		
85.1	Hosting History www.Bigworldshoes.com 3/10/08		
85.2	Hosting History www.Bigworldshoes.com 1/23/09		
85.3	Hosting History www.Bigworldshoes.com 1/27/09		
85.4	Hosting History www.Bigworldshoes.com 1/28/09		
87	Website www.Brandfashioner.com 8/29/07		
87.1	Website www.Brandfashioner.com 8/30/07		
87.2	Website www.Brandfashioner.com 9/19/07		
88	Hosting History www.Brandfashioner.com 8/30/07		
88.1	Hosting History www.Brandfashioner.com 9/19/07		
88.2	Hosting History www.Brandfashioner.com 3/10/08		
89	Website www.Brandstylesales.com 10/11/07		
90	Hosting History www.Brandstylesales.com 10/11/07		
90.1	Hosting History www.Brandstylesales.com 3/10/08		
91	Hosting History www.Brandtrading.net 3/10/08		
92	Website www.Buymyshoes.net 9/28/07		
92.1	Website www.Buymyshoes.net 11/22/07		
93	Hosting History www.Buymyshoes.net 9/28/07		
93.1	Hosting History www.Buymyshoes.net 3/10/08		
93.2	Hosting History www.Buymyshoes.net 3/12/08		
94	Website www.Cn-nike.us 8/23/07		
94.1	Website www.Cn-nike.us 5/12/08		
94.2	Website www.Cn-nike.us 2/11/09		
94.3	Website www.Cn-nike.us 1/29/09		
95	Hosting History www.Cn-nike.us (no date)		
95.1	Hosting History www.Cn-nike.us 8/22/07		
95.2	Hosting History www.Cn-nike.us 10/4/07		
95.3	Hosting History www.Cn-nike.us 11/23/07		
95.4	Hosting History www.Cn-nike.us 3/13/08		
95.5	Hosting History www.Cn-nike.us 4/28/08		
95.6	Hosting History www.Cn-nike.us 4/29/08		
95.7	Hosting History www.Cn-nike.us 5/13/08		
95.8	Hosting History www.Cn-nike.us 2/11/09		
95.9	Hosting History www.Cn-nike.us 1/29/09		
96	Website www.Dreamyshoes.com 11/13/07		

Motion in Limine to Exclude Internet Material and Testimony about Internet Material

Exhibits to be Excluded

96.1	Website www.Dreamyshoes.com 1/27/09		
96.2	Website www.Dreamyshoes.com 1/28/09		
97	Hosting History www.Dreamyshoes.com (no date)		
97.1	Hosting History www.Dreamyshoes.com 3/10/08		
97.2	Hosting History www.Dreamyshoes.com 1/23/09		
97.3	Hosting History www.Dreamyshoes.com 1/27/09		
97.4	Hosting History www.Dreamyshoes.com 1/28/09		
98	Website www.Eastarbiz.com 8/13/07		
98.1	Website www.Eastarbiz.com 9/19/07		
98.2	Website www.Eastarbiz.com 9/21/07		
98.3	Website www.Eastarbiz.com 5/12/08		
99	Hosting History www.Eastarbiz.com 8/13/07		
99.1	Hosting History www.Eastarbiz.com 9/19/07		
99.2	Hosting History www.Eastarbiz.com 3/10/08		
99.3	Hosting History www.Eastarbiz.com 4/28/08		
99.4	Hosting History www.Eastarbiz.com 4/29/08		
99.5	Hosting History www.Eastarbiz.com 5/13/08		
100	Hosting History www.Eastarbiz.net 8/21/08		
101	Website www.Ebuynike.com 8/14/07		
101.1	Website www.Ebuynike.com 8/22/07		
101.2	Website www.Ebuynike.com 8/27/07		
101.3	Website www.Ebuynike.com 10/24/07		
102	Hosting History www.Ebuynike.com 8/13/07		
102.1	Hosting History www.Ebuynike.com 8/14/07		
102.2	Hosting History www.Ebuynike.com 3/10/08		
103	Website www.Ecshoes.com 8/10/07		
104	Hosting History www.Ecshoes.com 8/10/07		
104.1	Hosting History www.Ecshoes.com 8/16/07		
104.2	Hosting History www.Ecshoes.com 8/20/07		
104.3	Hosting History www.Echoes.com 10/2/07		
104.4	Hosting History www.Echoes.com 3/10/08		
105	Webstie www.Egotobuy.com 9/28/07		
106	Hosting History www.Egotobuy.com 9/28/07		
106.1	Hosting History www.Egotobuy.com 3/10/08		
107	Website www.Emsyou.com 11/20/07		
108	Hosting History www.Emsyou.com 11/20/07		
108.1	Hosting History www.Emsyou.com 3/10/08		
109	Hosting History www.Eshoes99.net 1/23/09		
109.1	Hosting History www.Eshoes99.net 1/27/09		
109.2	Hosting History www.Eshoes99.net 1/28/09		
110	Website www.Famous-shop.com 3/8/07		
110.1	Website www.Famous-shop.com 4/20/07		
111	Hosting History www.Famous-shop.com (no date)		
111.1	Hosting History www.Famous-shop.com 3/7/07		

Motion in Limine to Exclude Internet Material and Testimony about Internet Material

Exhibits to be Excluded

111.2	Hosting History www.Famous-shop.com 9/19/07		
111.3	Hosting History www.Famous-shop.com 3/10/08		
113	Hosting History www.Fansjersey.com 3/10/08		
114	Website www.Guccifendi.com 8/20/07		
114.1	Website www.Guccifendi.com 9/19/07		
115	Hosting History www.Guccifendi.com 8/20/07		
115.1	Hosting History www.Guccifendi.com 9/19/07		
115.2	Hosting History www.Guccifendi.com 3/10/08		
118	Website www.Gz-free.com 8/14/07		
118.1	Website www.Gz-free.com 9/19/07		
119	Hosting History www.Gz-free.com (no date)		
119.1	Hosting History www.Gz-free.com 8/13/07		
119.2	Hosting History www.Gz-free.com 8/14/07		
119.3	Hosting History www.Gz-free.com 9/19/07		
119.4	Hosting History www.Gz-free.com 3/13/08		
120	Website www.Handbagsell.com 10/29/07		
120.1	Website www.Handbagsell.com 11/22/07		
121	Hosting History www.Handbagsell.com 10/29/07		
121.1	Hosting History www.Handbagsell.com 3/10/08		
122	Website www.ilouisvuitton.com 10/24/07		
123	Hosting History www.ilouisvuitton.com 10/24/07		
123.1	Hosting History www.ilouisvuitton.com 3/12/08		
124	Website www.Imitation-gold.com 10/2/07		
125	Hosting History www.Imitation-gold.com 10/2/07		
125.1	Hosting History www.Imitation-gold.com 3/12/08		
126	Website www.Innike.com 4/2/07		
126.1	Website www.Innike.com 9/19/07		
127	Hosting History www.Innike.com 4/2/07		
127.1	Hosting History www.Innike.com 9/19/07		
127.2	Hosting History www.Innike.com 3/12/08		
130	Website www.Longtimegroup.com 10/29/07		
131	Hosting History www.Longtimegroup.com 10/29/07		
131.1	Hosting History www.Longtimegroup.com 3/12/08		
132	Hosting History www.Louis-vuitton-bags.org 3/12/08		
133	Website www.Louisvuittonbagz.com 2/15/07		
133.1	Website www.Louisvuittonbagz.com 9/6/07		
134	Hosting History www.Louisvuittonbagz.com 2/15/07		
134.1	Hosting History www.Louisvuittonbagz.com 3/1/07		
134.2	Hosting History www.Louisvuittonbagz.com 3/8/07		
134.3	Hosting History www.Louisvuittonbagz.com 3/20/07		
134.4	Hosting History www.Louisvuittonbagz.com 9/6/07		
134.5	Hosting History www.Louisvuittonbagz.com 11/15/07		
134.6	Hosting History www.Louisvuittonbagz.com 11/22/07		
134.7	Hosting History www.Louisvuittonbagz.com 3/10/08		

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Exhibits to be Excluded

134.8	Hosting History www.Louisvuttionbagz.com 3/12/08		
135	Website www.Lovernike.com 10/11/07		
135.1	Website www.Lovernike.com 10/15/07		
136	Hosting History www.Lovernike.com 10/11/07		
136.1	Hosting History www.Lovernike.com 3/10/08		
137	Website www.Luxelike.com 9/20/07		
137.1	Website www.Luxelike.com 11/5/07		
138	Hosting History www.Luxelike.com 9/20/07		
138.1	Hosting History www.Luxelike.com 3/13/08		
139	Website www.Luxury2us.com 2/10/07		
140	Hosting History www.Luxury2us.com 10/2/07		
140.1	Hosting History www.Luxury2us.com 3/10/08		
143	Website www.Lvbagz.com 3/12/07		
144	Hosting History www.Lvbagz.com 3/9/07		
144.1	Hosting History www.Lvbagz.com 3/20/07		
144.2	Hosting History www.Lvbagz.com 9/6/07		
144.3	Hosting History www.Lvbagz.com 3/10/08		
144.4	Hosting History www.Lvbagz.com 4/28/08		
144.5	Hosting History www.Lvbagz.com 4/29/08		
144.6	Hosting History www.Lvbagz.com 5/13/08		
145	Hosting History www.Lv-nike.com 3/10/08		
146	Website www.Mailgoods.com 9/24/07		
146.1	Website www.Mailgoods.com - FAQ - 11/22/07		
147	Hosting History www.Mailgoods.com 9/24/07		
147.1	Hosting History www.Mailgoods.com 3/10/08		
148	Hosting History www.Myshoes99.com 3/10/08		
149	Website www.Nike558.com 8/23/07		
150	Hosting History www.Nike558.com 8/23/07		
150.1	Hosting History www.Nike558.com 9/19/07		
150.2	Hosting History www.Nike558.com 3/10/08		
151	Website www.Nikeshoeoffer.com 8/29/07		
151.1	Website www.Nikeshoeoffer.com 9/19/07		
151.2	Website www.Nikeshoeoffer.com 11/22/07 - About Us Page		
152	Hosting History www.Nikeshoeoffer.com 8/29/07		
152.1	Hosting History www.Nikeshoeoffer.com 9/19/07		
152.2	Hosting History www.Nikeshoeoffer.com 3/10/08		
153	Website www.Nikewto.com 9/25/07		
153.1	Website www.Nikewto.com 11/22/07		
153.2	Website www.Nikewto.com 11/28/07		
154	Hosting History www.Nikewto.com 9/25/07		
154.1	Hosting History www.Nikewto.com 3/10/08		
155	Website www.Nonstopbeauty.com 8/13/07		
155.1	Website www.Nonstopbeauty.com 9/19/07		

Motion in Limine to Exclude Internet Material and Testimony about Internet Material

Exhibits to be Excluded

156	Hosting History www.Nonstopbeauty.com 8/13/07		
156.1	Hosting History www.Nonstopbeauty.com 9/19/07		
156.2	Hosting History www.Nonstopbeauty.com 3/10/08		
157	Website www.Bizyao.com		
158	Hosting History www.Bizyao.com 3/10/09		
159	Webiste www.Nikebrother.com 5/13/08		
160	Hosting History www.Nikebrother.com 4/28/08		
160.1	Hosting History www.Nikebrother.com 4/29/08		
160.2	Hosting History www.Nikebrother.com 5/13/08		
161	Website www.Ecvv.com 5/13/08		
162	Hosting History www.Ecvv.com 4/28/08		
162.1	Hosting History www.Ecvv.com 4/29/08		
162.2	Hosting History www.Ecvv.com 5/13/08		
163	Website www.Lv-handbag.com 5/13/08		
164	Hosting History www.Lv-handbag.com 4/28/08		
164.1	Hosting History www.Lv-handbag.com 4/29/08		
164.2	Hosting History www.Lv-handbag.com 5/13/08		
165	Website www.At88.com 5/12/08		
166	Hosting History www.At88.com 4/28/08		
166.1	Hosting History www.At88.com 4/29/08		
166.2	Hosting History www.At88.com 5/13/08		
167	Website www.Pfcstation.com 8/2/07		
167.1	Website www.Pfcstation.com 9/19/07		
168	Hosting History www.Pfcstation.com 8/2/07		
168.1	Hosting History www.Pfcstation.com 9/19/07		
168.2	Hosting History www.Pfcstation.com 3/10/08		
169	Website www.Pickhiphop.com 9/10/07		
169.1	Website www.Pickhiphop.com 11/22/07		
170	Hosting History www.Pickhiphop.com 9/10/07		
170.1	Hosting History www.Pickhiphop.com 3/10/08		
171	Website www.Pickyourgoods.com 2/7/07		
171.1	Website www.Pickyourgoods.com 3/30/07		
171.2	Website www.Pickyourgoods.com 9/19/07		
171.3	Website www.Pickyourgoods.com 11/22/07		
172	Hosting History www.Pickyourgoods.com 2/7/07		
172.1	Hosting History www.Pickyourgoods.com 4/2/07		
172.2	Hosting History www.Pickyourgoods.com 9/19/07		
175	Evidence LV Monogram bag (brown)		
176	Website www.Pickyourorder.com 9/25/07		
177	Hosting History www.Pickyourorder.com 9/25/07		
177.1	Hosting History www.Pickyourorder.com 11/15/07		
177.2	Hosting History www.Pickyourorder.com 3/10/08		
178	Website www.Pro-jordan.com 8/7/07		
178.1	Website www.Pro-jordan.com 9/19/07		

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Exhibits to be Excluded

179	Hosting History www.Pro-jordan.com 8/7/07		
179.1	Hosting History www.Pro-jordan.com 9/19/07		
179.2	Hosting History www.Pro-jordan.com 3/10/08		
181	Hosting History www.Replica-ebags.com 3/10/08		
183	Website www.Rrgnl.com 8/27/07		
183.1	Website www.Rrgnl.com 9/19/07		
184	Hosting History www.Rrgnl.com 8/27/07		
184.1	Hosting History www.Rrgnl.com 9/19/07		
184.2	Hosting History www.Rrgnl.com 3/10/08		
187	Website www.Shoes-order.com 8/31/07		
187.1	Website www.Shoes-order.com 9/19/07		
187.2	Website www.Shoes-order.com 11/22/07		
188	Hosting History www.Shoes-order.com 8/31/07		
188.1	Hosting History www.Shoes-order.com 9/19/07		
188.2	Hosting History www.Shoes-order.com 3/10/08		
189	Website www.Soapparel.com 2/7/07		
189.1	Website www.Soapparel.com 4/2/07		
189.2	Website www.Soapparel.com 9/19/07		
190	Hosting History www.Soapparel.com 4/2/07		
190.1	Hosting History www.Soapparel.com 9/19/07		
190.2	Hosting History www.Soapparel.com 3/10/08		
193	Website www.Sunny7shoes.com 10/1/07		
193.1	Website www.Sunny7shoes.com 1/27/09		
193.2	Website www.Sunny7shoes.com 1/28/09		
194	Hosting History www.Sunny7shoes.com 10/1/07		
194.1	Hosting History www.Sunny7shoes.com 3/10/08		
194.2	Hosting History www.Sunny7shoes.com 1/23/09		
194.3	Hosting History www.Sunny7shoes.com 1/27/09		
194.4	Hosting History www.Sunny7shoes.com 1/28/09		
197	Website www.Super925.com 8/7/07		
197.1	Website www.Super925.com 9/19/07		
198	Hosting History www.Super925.com 8/7/07		
198.1	Hosting History www.Super925.com 9/19/07		
198.2	Hosting History www.Super925.com 3/10/08		
198.3	Hosting History www.Super925.com 3/12/08		
200	Hosting History www.Swisshours.biz 3/10/08		
202	Hosting History www.Tytrade88.com 3/10/08		
204	Hosting History www.Watchesnreplica.com 3/10/08		
205	Website www.Watchesreplica.net 7/27/07		
205.1	Website www.Watchesreplica.net 9/18/07		
206	Hosting History www.Watchesreplica.net 7/26/07		
206.1	Hosting History www.Watchesreplica.net 7/27/07		
206.2	Hosting History www.Watchesreplica.net 9/18/07		
206.3	Hosting History www.Watchesreplica.net 3/10/08		

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Exhibits to be Excluded

208	Website www.Watchnreplica.net 7/9/07		
208.1	Website www.Watchnreplica.net 9/19/07		
208.2	Website www.Watchnreplica.net 10/22/07		
209	Hosting History www.Watchnreplica.net 7/9/07		
209.1	Hosting History www.Watchnreplica.net 9/19/07		
209.2	Hosting History www.Watchnreplica.net 10/22/07		
212	Website www.Wearonline.net 1/23/06		
212.1	Website www.Wearonline.net 10/15/07		
213	Hosting History www.Wearonline.net 10/15/07		
213.1	Hosting History www.Wearonline.net 10/11/07		
213.2	Hosting History www.Wearonline.net 3/10/08		
213.3	Hosting History www.Wearonline.net 4/28/08		
213.4	Hosting History www.Wearonline.net 4/29/08		
213.5	Hosting History www.Wearonline.net 5/13/08		
214	Website www.Wendy929.com 1/09/07		
215	Hosting History www.Wendy929.com 6/22/07		
215.1	Hosting History www.Wendy929.com 9/19/07		
215.2	Hosting History www.Wendy929.com 3/10/08		
216	Website www.Worldkeytrade.com 11/14/07		
216.1	Website www.Worldkeytrade.com 11/20/07		
217	Hosting History www.Worldkeytrade.com 11/14/07		
217.1	Hosting History www.Worldkeytrade.com 11/20/07		
217.2	Hosting History www.Worldkeytrade.com 3/10/08		
217.3	Hosting History www.Worldkeytrade.com 3/11/08		
218	Website www.Yeahebay.com 11/28/07		
219	Hosting History www.Yeahebay.com 11/27/07		
219.1	Hosting History www.Yeahebay.com 3/11/08		
221	Hosting History www.Yseenet.net 3/11/08		
222	Website www.2008allshoes.com 7/25/08		
222.1	Website www.2008allshoes.com 1/20/09		
222.2	Website www.2008allshoes.com 1/30/09		
223	Hosting history www.2008allshoes.com 1/20/09		
223.1	Hosting history www.2008allshoes.com 1/30/09		
224	Website www.21cntrade.com 7/25/08		
226	Website www.21cn-trade.com 7/25/08		
228	Website www.Activestreetwear.com 7/25/08		
228.1	Website www.Activestreetwear.com 1/19/09		
228.2	Website www.Activestreetwear.com 1/26/09		
229	Hosting History www.ActiveStreetwear.com 1/19/09		
229.1	Hosting History www.ActiveStreetwear.com 1/26/09		
230	Website www.Aifacn.com 7/25/08		
230.1	Website www.Aifacn.com 1/19/09		
231	Hosting History www.Aifacn.com 1/19/09		
232	Website www.Aileapparelonline.com 7/25/08		

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Exhibits to be Excluded

232.1	Website www.Aileapparelonline.com 1/19/09		
232.2	Website www.Aileapparelonline.com 1/26/09		
232.3	Website www.Aileapparelonline.com 1/30/09		
233	Hosting History www.Aileapparelonline.com 1/19/09		
233.1	Hosting History www.Aileapparelonline.com 1/26/09		
233.2	Hosting History www.Aileapparelonline.com 1/30/09		
234	Website www.Alijordan.com 7/25/08		
234.1	Website www.Alijordan.com 1/19/09		
235	Hosting History www.Alijordan.com 1/19/09		
235.1	Hosting History www.Alijordan.com 1/30/09		
236	Website www.Asiaagora.com 7/25/08		
238	Website www.Bbnike.com 7/25/08		
238.1	Website www.Bbnike.com 1/19/09		
239	Hosting History www.Bbnike.com 1/19/09		
240	Website www.Bestgoods4u.com 7/25/08		
240.1	Website www.Bestgoods4u.com 1/19/09		
240.2	Website www.Bestgoods4u.com 1/30/09		
241	Hosting History www.Bestgoods4u.com 1/19/09		
241.1	Hosting History www.Bestgoods4u.com 1/30/09		
242	Website www.Biz918.com 7/25/08		
244	Website www.Bizwto.com 7/25/08		
244.1	Website www.Bizwto.com 1/20/09		
244.2	Website www.Bizwto.com 1/26/09		
244.3	Website www.Bizwto.com 1/30/09		
245	Hosting History www.Bizwto.com 1/20/09		
245.1	Hosting History www.Bizwto.com 1/26/09		
245.2	Hosting History www.Bizwto.com 1/30/09		
246	Website www.Brandshoesclub.com 7/25/08		
248	Website www.Chinabizshop.com 7/25/08		
248.1	Website www.Chinabizshop.com 1/20/09		
249	Hosting History www.Chinabizshop.com 1/20/09		
249.1	Hosting History www.Chinabizshop.com 1/30/09		
250	Website www.China-sneakers.com 7/25/08		
250.1	Website www.China-sneakers.com 1/20/09		
250.2	Website www.China-sneakers.com 1/30/09		
251	Hosting History www.China-sneakers.com 1/20/09		
251.1	Hosting History www.China-Sneakers.com 1/30/09		
252	Website www.Cicitrade.com 7/25/08		
252.1	Website www.Cicitrade.com 1/20/09		
252.2	Website www.Cicitrade.com 1/30/09		
253	Hosting History www.Cicitrade.com 1/20/09		
253.1	Hosting History www.Cicitrade.com 1/30/09		
254	Website www.Cn2009.com 7/25/08		
254.1	Website www.Cn2009.com 1/20/09		

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Exhibits to be Excluded

255	Hosting History www.Cn2009.com 1/20/09		
255.1	Hosting History www.Cn2009.com 1/30/09		
256	Website www.Cnlv.us 7/25/08		
256.1	Website www.Cnlv.us 1/20/09		
256.2	Website www.Cnlv.us 1/30/09		
257	Hosting History www.Cnlv.us 1/20/09		
257.1	Hosting History www.Cnlv.us 1/30/09		
258	Website www.Cn-nfl.com 7/25/08		
260	Website www.Cntradetop.com 7/25/08		
262	Website www.Cocotrade.com 7/25/08		
262.1	Website www.Cocotrade.com 1/20/09		
263	Hosting History www.Cocotrade.com 1/20/09		
263.1	Hosting History www.Cocotrade.com 1/30/09		
264	Website www.Copy-offer.com 7/25/08		
264.1	Website www.Copy-offer.com 1/20/09		
264.2	Website www.Copy-offer.com 1/30/09		
265	Hosting History www.Copy-Offer.com 1/20/09		
265.1	Hosting History www.Copy-Offer.com 1/30/09		
266	Website www.Copytransfer.com 7/25/08		
266.1	Website www.Copytransfer.com 1/26/09		
266.2	Website www.Copytransfer.com 1/30/09		
267	Hosting History www.Copytransfer.com 1/26/09		
267.1	Hosting History www.Copytransfer.com 1/30/09		
268	Website www.Cxdtrade.com 7/25/08		
268.1	Website www.Cxdtrade.com 1/20/09		
268.2	Website www.Cxdtrade.com 1/30/09		
269	Hosting History www.Cxdtrade.com 1/20/09		
269.1	Hosting History www.Cxdtrade.com 1/30/09		
270	Website www.Dadidatrade.com 7/25/08		
270.1	Website www.Dadidatrade.com 1/26/09		
270.2	Website www.Dadidatrade.com 1/30/09		
271	Hosting History www.Dadidatrade.com 1/26/09		
271.1	Hosting History www.Dadidatrade.com 1/30/09		
272	Website www.Divastyle-exclusives.com 7/25/08		
274	Website www.Dowellchina.com 7/25/08		
276	Website www.E-bayshoe.com 7/25/08		
276.1	Website www.E-bayshoe.com 1/20/09		
276.2	Website www.E-bayshoe.com 1/30/09		
277	Hosting History www.E-bayshoe.com 1/20/09		
277.1	Hosting History www.E-bayshoe.com 1/30/09		
278	Website www.Ebaytra.com 7/25/08		
278.1	Website www.Ebaytra.com 1/20/09		
278.2	Website www.Ebaytra.com 1/30/09		
279	Hosting History www.Ebaytra.com 1/20/09		

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Exhibits to be Excluded

279.1	Hosting History www.Ebaytra.com 1/30/09		
280	Website www.Ec21china.com 7/25/08		
280.1	Website www.Ec21china.com 1/20/09		
280.2	Website www.Ec21china.com 1/30/09		
281	Hosting History www.Ec21china.com 1/20/09		
281.1	Hosting History www.Ec21china.com 1/30/09		
282	Website www.Ecvnike.com 7/25/08		
284	Website www.Electricvip.com 7/25/08		
284.1	Website www.Electricvip.com 1/20/09		
284.2	Website www.Electricvip.com 1/30/09		
285	Hosting History www.Electricvip.com 1/20/09		
285.1	Hosting History www.Electricvip.com 1/30/09		
286	Website www.Equaldeal.com 5/12/08		
286.1	Website www.Equaldeal.com 7/25/08		
286.2	Website www.Equaldeal.com 1/28/09		
287	Hosting History www.Equaldeal.com 4/28/08		
287.1	Hosting History www.Equaldeal.com 4/29/08		
287.2	Hosting History www.Equaldeal.com 5/13/08		
287.3	Hosting History www.Equaldeal.com 1/28/09		
288	Website www.Eshoesbiz.com 7/25/08		
288.1	Website www.Eshoesbiz.com 1/27/09		
288.2	Website www.Eshoesbiz.com 1/28/09		
288.3	Website www.Eshoesbiz.com 1/30/09		
289	Hosting History www.Eshoesbiz.com 1/27/09		
289.1	Hosting History www.Eshoesbiz.com 1/28/09		
289.2	Hosting History www.Eshoesbiz.com 1/30/09		
290	Website www.Factory-trade.com 7/25/08		
292	Website www.Fallinmall.com 7/25/08		
292.1	Website www.Fallinmall.com 1/26/09		
292.2	Website www.Fallinmall.com 1/30/09		
293	Hosting History www.Fallinmall.com 1/26/09		
293.1	Hosting History www.Fallinmall.com 1/30/09		
294	Website www.Fashionholland.com 7/25/08		
294.1	Website www.Fashionholland.com 1/20/09		
294.2	Website www.Fashionholland.com 1/30/09		
295	Hosting History www.Fashionholland.com 1/20/09		
295.1	Hosting History www.Fashionholland.com 1/26/09		
295.2	Hosting History www.Fashionholland.com 1/30/09		
296	Website www.Fugems.com 7/25/08		
298	Website www.Gegtrade.com 7/25/08		
300	Website www.Gift-pop.com 7/25/08		
300.1	Website www.Gift-pop.com 1/20/09		
300.2	Website www.Gift-pop.com 1/30/09		
301	Hosting History www.Gift-pop.com 1/20/09		

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Exhibits to be Excluded

301.1	Hosting History www.Gift-pop.com 1/26/09		
301.2	Hosting History www.Gift-pop.com 1/30/09		
302	Website www.Goingwto.com 7/25/08		
302.1	Website www.Goingwto.com 1/20/09		
303	Hosting History www.Goingwto.com 1/20/09		
303.1	Hosting History www.Goingwto.com 1/26/09		
304	Website www.Guangruntrade.com 7/25/08		
304.1	Website www.Guangruntrade.com 1/20/09		
304.2	Website www.Guangruntrade.com 1/30/09		
305	Hosting History www.Guangruntrade.com 1/20/09		
305.1	Hosting History www.Guangruntrade.com 1/26/09		
305.2	Hosting History www.Guangruntrade.com 1/30/09		
306	Website www.lknowkick.com 7/25/08		
306.1	Website www.lknowkick.com 1/20/09		
307	Hosting History www.lknowkick.com 1/20/09		
308	Website www.ilovereplica.com 7/25/08		
310	Website www.Joinustrade.com 7/25/08		
310.1	Website www.Joinustrade.com 1/20/09		
310.2	Website www.Joinustrade.com 1/30/09		
311	Hosting History www.Joinustrade.com 1/20/09		
311.1	Hosting History www.Joinustrade.com 1/30/09		
312	Website www.Jordanaf1.com 7/25/08		
312.1	Website www.Jordanaf1.com 1/20/09		
312.2	Website www.Jordanaf1.com 1/30/09		
313	Hosting History www.Jordanaf1.com 1/20/09		
313.1	Hosting History www.Jordanaf1.com 1/26/09		
313.2	Hosting History www.Jordanaf1.com 1/30/09		
314	Website www.Jordan-plaza.com 7/25/08		
314.1	Website www.Jordan-plaza.com 1/20/09		
315	Hosting History www.Jordan-plaza.com 1/20/09		
315.1	Hosting History www.Jordan-plaza.com 1/26/09		
316	Website www.Kickaaa.com 7/25/08		
316.1	Website www.Kickaaa.com 1/26/09		
316.2	Website www.Kickaaa.com 1/30/09		
317	Hosting History www.Kickaaa.com 1/26/09		
317.1	Hosting History www.Kickaaa.com 1/30/09		
318	Website www.Kneagle.com 7/25/08		
318.1	Website www.Kneagle.com 1/20/09		
318.2	Website www.Kneagle.com 1/30/09		
319	Hosting History www.Kneagle.com 1/20/09		
319.1	Hosting History www.Kneagle.com 1/26/09		
319.2	Hosting History www.Kneagle.com 1/30/09		
320	Website www.Laceduptrade.com 7/25/08		
322	Website www.Lg668.com 7/25/08		

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Exhibits to be Excluded

322.1	Website www.Lg668.com 1/26/09		
322.2	Website www.Lg668.com 1/30/09		
323	Hosting History www.Lg668.com 1/26/09		
323.1	Hosting History www.Lg668.com 1/30/09		
324	Website www.Look9good.com 7/25/08		
324.1	Website www.Look9good.com 1/28/09		
324.2	Website www.Look9good.com 1/30/09		
325	Hosting History www.Look9good.com 1/28/09		
325.1	Hosting History www.Look9good.com 1/30/09		
326	Website www.Maike998.com 7/25/08		
326.1	Website www.Maike998.com 1/23/09		
326.2	Website www.Maike998.com 1/30/09		
327	Hosting History www.Maike998.com 1/23/09		
327.1	Hosting History www.Maike998.com 1/30/09		
328	Website www.Mayfutrade.com 7/25/08		
330	Website www.Nft.cc 7/25/08		
332	Website www.Nikejordan.us 7/25/08		
332.1	Website www.Nikejordan.us 1/26/09		
332.2	Website www.Nikejordan.us 1/30/09		
333	Hosting History www.Nikejordan.us 1/26/09		
333.1	Hosting History www.Nikejordan.us 1/30/09		
334	Website www.Nikejordanun.com 7/25/08		
336	Website www.Nike-king.com 7/25/08		
338	Website www.Nikeme.com 7/25/08		
338.1	Website www.Nikeme.com 1/23/09		
338.2	Website www.Nikeme.com 1/30/09		
339	Hosting History www.Nikeme.com 1/23/09		
339.1	Hosting History www.Nikeme.com 1/30/09		
340	Website www.Nikeseller.com 7/25/08		
340.1	Website www.Nikeseller.com 1/26/09		
340.2	Website www.Nikeseller.com 1/30/09		
341	Hosting History www.Nikeseller.com 1/26/09		
341.1	Hosting History www.Nikeseller.com 1/30/09		
342	Website www.Nikeshoes888.com 7/25/08		
342.1	Website www.Nikeshoes888.com 1/27/09		
342.2	Website www.Nikeshoes888.com 1/30/09		
343	Hosting History www.Nikeshoes888.com 1/27/09		
343.1	Hosting History www.Nikeshoes888.com 1/30/09		
344	Website www.Nikeshoeshua.com 7/25/08		
344.1	Website www.Nikeshoeshua.com 1/23/09		
344.2	Website www.Nikeshoeshua.com 1/30/09		
345	Hosting History www.Nikeshoeshua.com 1/23/09		
345.1	Hosting History www.Nikeshoeshua.com 1/30/09		
346	Website www.Nikeshoesshopping.com 7/25/08		

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Exhibits to be Excluded

346.1	Website www.Nikeshoesshopping.com 1/23/09		
346.2	Website www.Nikeshoesshopping.com 1/30/09		
347	Hosting History www.Nikeshoesshopping.com 1/23/09		
347.1	Hosting History www.Nikeshoesshopping.com 1/30/09		
348	Website www.Nikeskyb2b.com 7/25/08		
350	Website www.Niketradng.com 7/25/08		
350.1	Website www.Niketradng.com 1/23/09		
350.2	Website www.Niketradng.com 1/30/09		
351	Hosting History www.Niketradng.com 1/23/09		
351.1	Hosting History www.Niketradng.com 1/30/09		
353	Hosting History www.Nikexp.com 4/28/08		
353.1	Hosting History www.Nikexp.com 4/29/08		
353.2	Hosting History www.Nikexp.com 5/13/08		
354	Website www.Nikezone23.com 8/5/08		
354.1	Website www.Nikezone23.com 1/27/09		
355	Hosting History www.Nikezone23.com 1/27/09		
356	Website www.Popularkicks8.com 5/13/08		
356.1	Website www.Popularkicks8.com 7/25/08		
356.2	Website www.Popularkicks8.com 1/30/09		
356.3	Website www.Popularkicks8.com 1/29/09		
356.4	Website www.Popularkicks8.com 1/27/09		
356.5	Website www.Popularkicks8.com 1/30/09		
357	Hosting History www.Popularkicks8.com 4/28/08		
357.1	Hosting History www.Popularkicks8.com 4/29/08		
357.2	Hosting History www.Popularkicks8.com 5/13/08		
357.3	Hosting History www.Popularkicks8.com 1/29/09		
357.4	Hosting History www.Popularkicks8.com 1/27/09		
357.5	Hosting History www.Popularkicks8.com 1/30/09		
358	Website www.Realfashion.us 7/25/08		
358.1	Website www.Realfashion.us 1/23/09		
358.2	Website www.Realfashion.us 1/30/09		
359	Hosting History www.Realfashion.us 1/23/09		
359.1	Hosting History www.Realfashion.us 1/30/09		
360	Website www.Replicabc.com 5/13/08		
360.1	Website www.Replicabc.com 2/11/09		
360.2	Website www.Replicabc.com 1/27/09		
361	Hosting History www.Replicabc.com 4/28/08		
361.1	Hosting History www.Replicabc.com 4/29/08		
361.2	Hosting History www.Replicabc.com 5/13/08		
361.3	Hosting History www.Replicabc.com 2/11/09		
361.4	Hosting History www.Replicabc.com 1/27/09		
362	Website www.Ruimachina.com 7/25/08		

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Exhibits to be Excluded

362.1	Website www.Ruimachina.com 1/26/09		
362.2	Website www.Ruimachina.com 1/30/09		
363	Hosting History www.Ruimachina.com 1/26/09		
363.1	Hosting History www.Ruimachina.com 1/30/09		
364	Website www.Sellcnshoes.com 7/25/08		
364.1	Website www.Sellcnshoes.com 1/26/09		
364.2	Website www.Sellcnshoes.com 1/30/09		
365	Hosting History www.sellcnshoes.com 1/26/09		
365.1	Hosting History www.sellcnshoes.com 1/30/09		
366	Website www.Shoestrade.biz 7/25/08		
366.1	Website www.Shoestrade.biz 2/10/09		
367	Hosting History www.Shoestrade.biz 2/10/09		
367.1	Website www.Shoestrade.biz 1/23/09		
367.2	Hosting History www.Shoestrade.biz 1/23/09		
367.3	Website www.Shoestrade.biz 1/30/09		
367.4	Hosting History www.Shoestrade.biz 1/30/09		
368	Website www.Shoestrade168.com 7/25/08		
368.1	Website www.Shoestrade168.com 1/26/09 (redirect to nike-shoes.com.cn)		
368.2	Website www.Shoestrade168.com 1/27/09 (redirect to nike-shoes.com.cn)		
369	Hosting History www.nike-shoes.com.cn 1/26/09		
370	Website www.Shop-zappos.com 8/5/08		
372	Website www.Shopping-key.com 7/25/08		
372.1	Website www.Shopping-key.com 1/23/09		
372.2	Hosting History www.Shopping-key.com 1/23/09		
372.3	Website www.Shopping-key.com 1/30/09		
373	Hosting History www.Shopping-key.com 1/30/09		
374	Website www.Shp365.com 7/25/08		
376	Website www.Sndress-trade.com 7/25/08		
376.1	Website www.Sndress-trade.com 1/23/09		
376.2	Website www.Sndress-trade.com 1/30/09		
377	Hosting History www.Sndress-trade.com 1/23/09		
377.1	Hosting History www.Sndress-trade.com 1/30/09		
378	Website www.Sneaker123.com 8/5/08		
378.1	Website www.Sneaker123.com 1/23/09		
378.2	Website www.Sneaker123.com 1/30/09		
379	Hosting History www.Sneaker123.com 1/23/09		
379.1	Hosting History www.Sneaker123.com 1/30/09		
380	Website www.Sportshoesshow.com 7/25/08		
380.1	Website www.sportshoesshow.com 1/23/09		
380.2	Website www.sportshoesshow.com 1/30/09		
381	Hosting history www.sportshoesshow.com 1/23/09		
381.1	Hosting history www.sportshoesshow.com 1/23/09		

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Exhibits to be Excluded

382	Website www.Sport-sky.com 7/25/08		
382.1	Website www.sport-sky.com 1/23/09		
383	Hosting history www.sport-sky.com 1/23/09		
384	Website www.Super99nike.com 7/25/08		
384.1	Website www.super99nike.com 1/23/09		
384.2	Website www.super99nike.com 1/30/09		
385	Hosting history www.super99nike.com 1/23/09		
385.1	Hosting history www.super99nike.com 1/30/09		
386	Website www.Thefirstshoes.com 7/25/08		
388	Website www.Tmslw.com 8/5/08		
390	Website www.Tomorrow-trade.com 7/25/08		
392	Website www.Tophopworld.com 8/5/08		
392.1	Website www.tophopworld.com 1/23/09		
392.2	Website www.tophopworld.com 1/30/09		
393	Hosting history www.tophopworld.com 1/23/09		
393.1	Hosting history www.tophopworld.com 1/30/09		
394	Website www.Trade31.com 7/25/08		
394.1	Website www.trade31.com 1/23/09		
394.2	Website www.trade31.com 1/30/09		
395	Hosting history www.trade31.com 1/23/09		
395.1	Hosting history www.trade31.com 1/30/09		
396	Website www.Trade58.com 7/25/08		
398	Website www.Trade789.com 7/25/08		
398.1	Website www.trade789.com 1/23/09		
398.2	Website www.trade789.com 1/30/09		
399	Hosting history www.trade789.com 1/23/09		
399.1	Hosting history www.trade789.com 1/30/09		
400	Website www.Tradekey1.com 7/25/08		
400.1	Website www.tradekey1.com 1/26/09		
401	Hosting history www.tradekey1.com 1/26/09		
401.1	Hosting history www.tradekey1.com 1/30/09		
402	Hosting history www.Tradekeylead.com 5/13/08		
404	Hosting history www.Top-handbag.com 5/13/08		
406	Hosting history www.Tradekeystar.com 5/13/08		
407	Website www.Tradewto.com 7/25/08		
407.1	Website www.tradewto.com 1/27/09		
407.2	Website www.tradewto.com 1/30/09		
408	Hosting history www.tradewto.com 1/27/09		
408.1	Hosting history www.tradewto.com 1/30/09		
409	Website www.Trapkicks.com 7/25/08		
409.1	Website www.Trapkicks.com 2/10/09		
409.2	Website www.trapkicks.com 1/26/09		
409.3	Website www.trapkicks.com 1/27/09		
409.4	Website www.trapkicks.com 1/30/09		

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Exhibits to be Excluded

410	Hosting History www.Trapkicks.com 2/10/09		
410.1	Hosting history www.trapkicks.com 1/26/09		
410.2	Hosting history www.trapkicks.com 1/30/09		
411	Website www.Trendstown.com 7/25/08		
413	Website www.Viciper.com 7/25/08		
413.1	Website www.viciper.com 1/22/09		
413.2	Website www.viciper.com 1/30/09		
414	Hosting history www.viciper.com 1/22/09		
414.1	Hosting history www.viciper.com 1/30/09		
415	Website www.Vow-Nike.com 7/25/08		
415.1	Website www.vow-nike.com 1/29/09		
415.2	Website www.vow-nike.com 1/30/09		
416	Hosting history www.vow-nike.com 1/29/09		
416.1	Hosting history www.vow-nike.com 1/30/09		
417	Website www.Well-Telecom.com 8/5/08		
419	Website www.Wholesale-bn.com 7/25/08		
419.1	Website www.wholesale-bn.com 1/22/09		
419.2	Website www.wholesale-bn.com 1/30/09		
420	Hosting history www.wholesale-bn.com 1/22/09		
420.1	Hosting history www.wholesale-bn.com 1/30/09		
421	Website www.Wholesalerelectron.com 7/25/08		
421.1	Website www.whosalerelectron.com 1/22/09		
422	Hosting history www.whosalerelectron.com 1/22/09		
422.1	Hosting history www.whosalerelectron.com 1/30/09		
423	Website www.Xinda-trade.com 7/25/08		
423.1	Website www.xinda-trade.com 1/22/09		
423.2	Website www.xinda-trade.com 1/30/09		
424	Hosting history www.xinda-trade.com 1/22/09		
424.1	Hosting history www.xinda-trade.com 1/23/09		
424.2	Hosting history www.xinda-trade.com 1/30/09		
425	Website www.Xinteshoes.com 7/25/08		
425.1	Website www.xinteshoes.com 1/23/09		
425.2	Website www.xinteshoes.com 1/30/09		
426	Hosting history www.xinteshoes.com 1/23/09		
426.1	Hosting history www.xinteshoes.com 1/30/09		
427	Website www.Xqmade.com 7/25/08		
427.1	Website www.xqmade.com 1/23/09		
427.2	Website www.xqmade.com 1/30/09		
428	Hosting history www.xqmade.com 1/23/09		
428.1	Hosting history www.xqmade.com 1/30/09		
429	Website www.Yabertrade.com 7/25/08		
429.1	Website www.Yabertrade.com 1/23/09		
429.2	Website www.Yabertrade.com 1/30/09		
430	Hosting history www.yabertrade.com 1/23/09		

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Exhibits to be Excluded

430.1	Hosting history www.yabertrade.com 1/30/09		
431	Website www.Yournikeshop.com 7/25/08		
432.1	Website www.Yournikeshop.com 1/28/09		
432	Website www.Yournikeshop.com 1/27/09		
432.2	Website www.Yournikeshop.com 1/28/09		
432.3	Website www.Yournikeshop.com 1/30/09		
433	Hosting history www.Yournikeshop.com 1/28/09		
433.1	Hosting history www.Yournikeshop.com 1/28/09		
433.2	Hosting history www.yournikeshop.com 1/27/09		
433.3	Hosting history www.yournikeshop.com 1/30/09		
490	Website www.Bapesky.com 2/10/09		
490.1	Website www.Bapesky.com 1/27/09		
491	Hosting History www.Bapesky.com 1/23/09		
491.1	Hosting History www.Bapesky.com 1/27/09		
492	Website www.Sportsvendor.biz 2/10/09		
493	Hosting History www.Sportsvendor.biz 2/10/09		
496	Website www.Bagforyourself.com 2/11/09		
496.1	Website www.Bagforyourself.com 1/28/09		
497	Hosting History www.Bagforyourself.com 2/11/09		
497.1	Hosting History www.Bagforyourself.com 1/28/09		
498	Website www.Bapedirect.com 2/11/09		
499	Hosting History www.Bapedirect.com 2/11/09		
502	Website www.wholesaleprice.us 1/27/09		
503	Hosting History www.wholesaleprice.us 1/27/09		
504	Website www.supplyingshoes.com 1/27/09		
504.1	Website www.supplyingshoes.com 1/28/09		
505	Hosting History www.supplyingshoes.com 1/27/09		
505.1	Hosting History www.supplyingshoes.com 1/28/09		
506	Website www.itemscatalog.com 1/28/09		
506.1	Website www.itemscatalog.com 1/30/09		
507	Hosting History www.itemscatalog.com 1/28/09		
507.1	Hosting History www.itemscatalog.com 1/30/09		
508	Website www.itemscatalog.com 1/28/09		
509	Hosting History www.itemscatalog.com 1/28/09		
510	Website www.globwholesale.com 1/28/09		
511	Hosting History www.globwholesale.com 1/28/09		
512	Website www.eshoes99.net 1/27/09		
512.1	Website www.eshoes99.net 1/28/09		
514	Website www.ec21copy.com 1/20/09		
515	Hosting History www.ec21copy.com 1/20/09		
516	Website www.ecvvcn.com 1/20/09		
516.1	Website www.ecvvcn.com 1/30/09		
517	Hosting History www.ecvvcn.com 1/20/09		
517.1	Hosting History www.ecvvcn.com 1/30/09		

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Exhibits to be Excluded

518	Website www.nike-shoes.com.cn 1/26/09		
518.1	Website www.nike-shoes.com.cn 1/27/09		
519	Hosting History www.nike-shoes.com.cn 1/26/09		
519.1	Hosting History www.nike-shoes.com.cn 1/27/09		
520	Website www.tradeelectron.com 1/27/09		
520.1	Website www.tradeelectron.com 1/30/09		
521	Hosting history www.tradeelectron.com 1/30/09		
525	Website www.66773388.com 1/30/09		
526	Hosting history www.66773388.com 1/30/09		