

1 Defendants are the Partnerships and Unincorporated Associations identified on Schedule "A" hereto.

and (d).

Defendants,¹ for alleged violations of the Lanham Act, 15 U.S.C. §§ 1114, and 1125(a) expiration of the temporary restraining order, a preliminary injunction against and an order restraining the financial accounts used by Defendants, and upon 15 U.S.C. § 1116 and Fed. R. Civ. P. 65, for entry of a Temporary Restraining Order Plaintiff, Louis Vuitton Malletier, S.A. ("Louis Vuitton") moves *ex parte* pursuant to premises.

Court has carefully considered the *Ex Parte* Application and is otherwise advised in the Assets Tied to the Counterfeiting Operation [DE 4] (the "*Ex Parte* Application"). The Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of THIS CAUSE is before the Court on Plaintiff's *Ex Parte* Application for Entry of

ORDER GRANTING TEMPORARY RESTRAINING ORDER EX PARTE

Defendants.




BAGS-WATCH-REPLICAS.ORG, et al,

vs.

Plaintiff,

LOUIS VUITTON MALLETIER, S.A.,

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 12-62096-CIV-COHN

Class(es) / Relevant Goods	Registration Date	Registration Number	Trademark
IC 16: travel goods catalogs, stationery, pads of stationery, calendars, indexes for articles, made for travellers, notebooks, envelopes; printed labels for luggage and other travel goods and leather holders therefor, sold as a unit; writing paper, paper bags for packaging, hat boxes, paper or cardboard boxes, photographs, adhesives for stationery, office requisites in the	September 28, 1993	1,794,905	
IC 18: trunks, valises, traveling bags, satchels, hat boxes and shoe boxes used for luggage, hand bags, and pocketbooks.	January 10, 1989	1,519,828	
IC 18: luggage and ladies' handbags.	August 10, 1976	1,045,932	LOUIS VUITTON
IC 18: trunks, valises, traveling bags, satchels, hat boxes and shoe boxes used for luggage, hand bags, and pocketbooks.	September 20, 1932	0,297,594	

the "Louis Vuitton Marks"):

2. Plaintiff is the owner and/or exclusive licensee of the following trademarks on the Principal Register of the United States Patent and Trademark Office (collectively,


Application for Temporary Restraining Order ["Livadkin Decl.," ¶ 4.]


1. Plaintiff manufactures, promotes, distributes, and sells in interstate commerce, including within this judicial district, luxury goods under multiple federally registered trademarks. (See Declaration of Nikolay Livadkin in Support of Plaintiff's


Parte Application, and supporting evidentiary submissions.


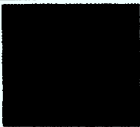
The Court bases this Order on the following facts from Plaintiff's Complaint, Ex


I. Factual Background





Class(es) / Relevant Goods	Registration Date	Registration Number	Trademark
<p>IC 25: clothing for men and women; namely belts, shawls, sashes, scarves; footwear, and headgear.</p> <p>nature of writing pads, letter trays, paper cutters, letter openers, writing tablets, pencils, pencil holders, fountain pens, ballpoint pens, pen cases, pencil cases, lead holders, ballpoints for pens, nibs, nibs of gold, inkwells, inkstands, and playing cards.</p>			
<p>IC 14: jewelry, watches, and straps for wrist watches.</p>	<p>November 28, 1995</p>	<p>1,938,808</p>	
<p>IC 14: watches and straps for wrist watches.</p> <p>IC 16: catalogues featuring luggage and travel accessories, bags, small leather goods, and garments; notebooks, anthologies, and pamphlets referring to travel; calendars; telephone indexes; fountain pens, ballpoint pens, nibs, covers for pocket and desk diaries, and notebook holders.</p> <p>IC 18: trunks; traveling trunks; suitcases; traveling bags; luggage; garment bags for travel; hat boxes for travel; shoe bags for travel; umbrellas; animal carriers; rucksacks; haversacks; leather or textile shopping bags; beach bags; handbags; vanity cases sold empty; attache cases; tote bags, travel satchels; clutch bags; briefcases; wallets; pocket</p>	<p>August 6, 1996</p>	<p>1,990,760</p>	<p>LOUIS VUITTON</p>

Class(es) / Relevant Goods	Registration Date	Registration Number	Trademark
<p>wallets; credit card cases; business card cases; bill and card holders; checkbook holders; key cases; change purses; briefcase-type portfolios.</p> <p>IC 24: travel blankets</p> <p>IC 25: shirts; sweatshirts; polo shirts; T-shirts; headwear; jackets; ties; belts; shawls; scarves.</p>			
<p>IC 14: goods made of precious metals, namely, shoe ornaments, ornamental pins; jewelry, namely, rings, ear rings, cufflinks, bracelets, charms, necklaces; horological instruments, straps for watches, watches and wrist-watches, and cases for watches.</p> <p>IC 18: goods made of leather or imitations of leather are not included in other classes, namely, boxes made from leather; trunks, valises, traveling bags, luggage for travel, garment bags for travel, vanity cases sold empty, rucksacks, hand bags, beach bags, shopping bags, shoulder bags, attache cases, briefcases, and fine leather goods, namely, pocket wallets, purses, leather key holders, business card cases, calling card cases, and credit card cases, and umbrellas.</p> <p>IC 25: clothing and underwear, namely, sweaters, shirts, suits, waistcoats, raincoats, skirts, coats, pullovers, trousers, dresses, jackets, shawls, stoles, sashes for wear, scarves,</p>	<p>August 4, 1998</p>	<p>2,177,828</p>	

Trademark	Registration Number	Registration Date	Class(es) / Relevant Goods
	2,181,753	August 18, 1998	<p>IC 014: goods made of precious metals, namely, shoe ornaments, ornamental pins, jewelry, namely, rings, belt buckles, ear rings, cufflinks, bracelets, charms, necklaces, horological instruments, straps for watches, watches, and wrist-watches, and cases for watches.</p> <p>IC 18: goods made of leather or imitations of leather are not included in other classes, namely, boxes made from leather, trunks, valises, traveling bags, luggage for travel, garment bags for travel, vanity cases sold empty, rucksacks, hand bags, beach bags, shopping bags, shoulder bags, attaché cases, briefcases, and fine leather goods, namely, pocket wallets, purses, leather key holders, business card cases, calling card cases, credit card cases, and umbrellas.</p> <p>IC 25: clothing and underwear, namely, sweaters, shirts, suits, waistcoats, raincoats, skirts, coats, pullovers, trousers, dresses, jackets, shawls, stoles, sashes for wear, scarves, neckties, pocket squares, gloves, belts, socks, bath robes, shoes, boots, and sandals.</p>
LOUIS VUITTON PARIS	2,346,373	May 2, 2000	<p>IC 14: jewelry, namely, rings, belt buckles, ear rings, cufflinks, bracelets, charms, brooches, necklaces, horological</p>

Class(es) / Relevant Goods	Registration Date	Registration Number	Trademark
<p>IC 18: Goods made of leather or of imitations of leather not included in other classes, namely, boxes for watches.</p> <p>IC 25: Clothing and underwear, instruments, watches, and cases for watches.</p> <p>IC 18: Goods made of leather or of imitations of leather not included in other classes, namely, boxes of leather used for travel; purposes, hat boxes for travel; trunks, valises, travelling bags, travelling sets for containing cosmetics, garment bags for travel, rucksacks, handbags, beach bags, shopping bags, shoulder bags, briefcases, pouches; fine leather goods, namely, pocket wallets, purses, key cases, card holders, checkbook holders; umbrellas.</p> <p>IC 25: Clothing and underwear, namely, sweaters, shirts, suits, waistcoats, skirts, coats, pullovers, trousers, dresses, clothing jackets, shawls, stoles, scarves, neckties, clothing belts, bathing suits, footwear; head wear and waterproof clothing, namely, raincoats.</p>			
<p>IC 25: Clothing, namely, sweaters, shirts, sweatshirts, polo shirts, t-shirts, suits, waistcoats, raincoats, skirts, pullovers, trousers, dresses, jackets, shawls, stoles, scarves, neckties, pocket squares, pocket handkerchief squares for wear, gloves, ties, belts, bathing suits, shoes, boots and sandals, and hats.</p>	<p>June 27, 2000</p>	<p>2,361,695</p>	
<p>IC 18: goods made of leather or imitations of leather not included in other classes, namely, boxes</p>	<p>August 22, 2000</p>	<p>2,378,388</p>	

Class(es) / Relevant Goods	Registration Date	Registration Number	Trademark
<p>of leather principally used for travel purposes, trunks, valises, traveling bags, traveling sets for containing cosmetics and jewelry, rucksacks, handbags, beach bags, shopping bags, shoulder bags, brief cases, pouches, fine leather goods namely, pocket wallets, purses, key cases, business card cases, credit card cases, and calling card cases.</p>			<p>LOUIS VUITTON PARIS</p>
<p>IC 14: Jewelry including rings, belt buckles of precious metals, earrings, cuff links, bracelets, charms, brooches, necklaces, tie pins, ornamental pins, and medallions; horological and chronometric instruments and apparatus, namely, watches, watch cases and clocks; nutcrackers of precious metals; candlesticks of precious metals, jewelry boxes of precious metals.</p>	<p>October 14, 2003</p>	<p>2,773,107</p>	
<p>IC 18: Travel bags, travel bags made of leather, luggage trunks and valises, garment bags for travel, vanity-cases sold empty; rucksacks, shoulder bags, handbags; attache-cases, briefcases, drawstring pouches, pocket wallets, purses, umbrellas, business card cases made of leather or of imitation leather, credit card cases made of leather or of imitation leather; calling card cases made of leather or of imitation leather; key holders made of leather or of imitation leather.</p> <p>IC 25: Clothing, namely,</p>			

Class(es) / Relevant Goods	Registration Date	Registration Number	Trademark
<p>underwear, sweaters, shirts, T-shirts, suits, hosiery, belts, scarves, neck ties, shawls, waistcoats, skirts, raincoats, overcoats, suspenders, trousers, jeans, pullovers, frocks, jackets, winter gloves, dress gloves, tights, socks, bathing suits, bath robes, pajamas, night dresses, shorts, pocket squares; highheeled shoes, low-heeled shoes, sandals, boots, and slippers.</p>			
<p>IC 09: Spectacles, sunglasses, and spectacle cases.</p>	November 29, 2005	3,021,231	
<p>IC 09: Spectacles, sunglasses, and spectacle cases.</p>	December 6, 2005	3,023,930	
<p>IC 09: Spectacles, sunglasses, and spectacle cases.</p>	January 24, 2006	3,051,235	
<p>IC 09: Spectacles, sunglasses, and spectacle cases. IC 14: Jewelry, namely, rings, key rings of precious metal, earrings and ear clips, cuff links, bracelets, charms, brooches, necklaces, tie pins, ornaments of precious metal, medallions; horological and chronometric apparatus and instruments, namely watches, watch cases, alarm clocks; jewelry boxes of precious metal, their alloys or coated therewith. IC 18: Leather and imitation leather products, namely, traveling bags, traveling sets comprised of bags or luggage,</p>	June 20, 2006	3,107,072	<p>FLOWER PATTERN</p> 

3. Defendants, through the Internet websites operating under the domain names identified on Schedule "A" hereto (the "Subject Domain Names"), have advertised, promoted, offered for sale, and/or sold, at least, handbags, wallets, luggage, key holders, belts, shirts, shoes, scarves, neckties, watches, jewelry, and sunglasses

Composite Exhibit A to the Livadkin Decl.)

The Louis Vuitton Marks are used in connection with the manufacture and distribution of goods in the categories identified above. (See Livadkin Decl. ¶ 5; see also United States Trademark Registrations of the Louis Vuitton Marks at issue attached as

Class(es) / Relevant Goods	Registration Date	Registration Number	Trademark
trunks and suitcases, garment bags for travel purposes, vanity cases sold empty, rucksacks, shoulder bags, handbags, attaché cases, document wallets, and briefcases made of leather, pouches made of leather, wallets, purses, key cases, business card cases, credit card cases; umbrellas. IC 25: Clothing and undergarments, namely, sweaters, shirts, tee-shirts, belts, scarves, neckties, shawls, waistcoats, skirts, raincoats, overcoats, suspenders, trousers, denim trousers, pullovers, dresses, jackets, sashes for wear, gloves, tights, bathing suits, bath robes, pajamas, nightgowns, shorts, pocket squares, shoes, boots, slippers, headgear, namely, hats and caps; underwear.			

of the Louis Vuitton Marks at issue in this action through the Internet website operating under the Subject Domain Name bags-watch-replicas.org; (ii) a key holder bearing at least one of the Louis Vuitton Marks at issue in this action through the Internet website operating under the Subject Domain Name fakelouisvuittonhandbag.com; and (iii) a belt bearing at least one of the Louis Vuitton Marks at issue in this action through the Internet website operating under the Subject Domain Name replica-louisvuitton-bags.org. (See Rosaler Decl. ¶¶ 4-9.) Rosaler finalized payment for the Louis Vuitton-branded wallet purchased through bags-watch-replicas.org via PayPal to the PayPal account, pinglily@hotmail.com. (See Rosaler Decl. ¶ 4 and Composite Exhibit A attached thereto.) Rosaler finalized payment for the Louis Vuitton-branded key holder purchased through fakelouisvuittonhandbag.com via PayPal to the PayPal account, okshop2009@hotmail.com. (See Rosaler Decl. ¶ 6 and Composite Exhibit C attached thereto.) Rosaler finalized payment for the Louis Vuitton-branded belt purchased through replica-louisvuitton-bags.org via PayPal to the PayPal account, christopherada121@gmail.com. (See Rosaler Decl. ¶ 8 and Composite Exhibit E attached thereto.) Rosaler received the Louis Vuitton branded wallet, key holder, and belt purchased via the bags-watch-replicas.org, fakelouisvuittonhandbag.com, and replica-louisvuitton-bags.org websites, respectively, each of which were shipped to his address in the Southern District of Florida. (See Rosaler Decl. ¶¶ 5, 7, 9 and Composite Exhibits B, D, and F attached thereto.)

7. Additionally, Rosaler accessed Internet websites operating under the Subject Domain Names identified in the table below, and went through the purchasing

process³ for various products, most of which bore counterfeit⁴ of, at least, one of the Louis Vuitton Marks at issue in this action.⁴ (Id. at ¶¶ 10-44 and Composite Exhibits G through O thereto.) Following submission of his orders, Rosaler received information for finalizing payment for each of the items ordered via PayPal to Defendants' respective PayPal accounts, as follows:

Subject Domain Name	PayPal Account
bestreplicawatches.us	goodbuyline@gmail.com
brandapparelstore.com	well5063@yahoo.com
cheaplouisvuittonhandbagsreplica.com	2496711347@qq.com
cheaplouisvuittonsaleoutlet.com	usahandbagsoutlet@gmail.com ⁵
louisvuittonpursesoutletonlines.com	xiang7793@hotmail.com
chinawholesale123.com	yzhqtrade@hotmail.com
cnwholesalebiz.com	z19622688@163.com
ebaylvoutlet.com	xiao8313@gmail.com
happychinatrade.com	yeilijung1986@163.com
inchinashoes.com	1677576386@qq.com
ineasybiz.com	oilpainting1986@hotmail.com
louisvuitton-bags-online-shop.com	garr37472006@hotmail.com
louisvuittondesignershop.com	274697833@qq.com
louis-vuittonhandbagsonsale.com	brantatrice769@gmail.com
louisvuitton-hermes.com	annabeauty84@yahoo.com

³ Rosaler was instructed to not finalize his purchases via the Internet websites so as to avoid contributing additional funds to the Defendants' coffers. (Gaffigan Decl. ¶ 4.)

⁴ Although all of the websites operating under the Subject Domain Names offer for sale Louis Vuitton branded items (see Gaffigan Decl. ¶ 2 and Composite Exhibit A thereto), Rosaler intentionally purchased non-Louis Vuitton-branded merchandise from some of the websites operating under the Subject Domain Names as part of his investigative process. (See Gaffigan Decl. ¶ 4.) Making purchases of mixed brands is a technique commonly used by investigators to avoid inadvertently tipping off the target as to which brand owner is conducting the investigation. (Id.)

⁵ Rosaler received identical PayPal account information from the cheaplouisvuittonsaleoutlet.com and louisvuittonpursesoutletonlines.com websites during his purchasing process. (See Rosaler Decl. ¶¶ 13-14 and Comp. Exs. J and K thereto.)

⁶ Rosaler received identical PayPal account information from the replica-louisvuitton-bags.org and louisvuitton-neverfullm.info websites during his purchasing process. (See Rosaler Decl. ¶¶ 37-38 and Comp. Exs. HH and II thereto.)

8. Thereafter, Plaintiff's representative reviewed and visually inspected the photographs and web page listings, including images, for the items bearing Plaintiff's trademarks purchased and received by Rosaler and determined the items to be non-genuine versions of Plaintiff's products. (See Livadkin Decl. ¶ 11.) Additionally, Plaintiff's representative reviewed and visually inspected the items bearing Plaintiff's trademarks offered for sale through the Internet websites operating under the Subject Domain Names and determined the products to be unauthorized, non-genuine versions of Plaintiff's products. (See Livadkin Decl. ¶¶ 12-14.)

(See Rosaler Decl. ¶¶ 10-44 and Composite Exhibits G through O thereto.)

louisvuittonimitationhandbags.com	1786291408@qq.com
louis-vuittonnordstrom.com	allisonck152@gmail.com
louisvuittonoutlet2.net	annachen1897@gmail.com
louisvuittonoutletjust.com	businessshonor@yahoo.com
louisvuittonusd.com	kentyang@hotmail.com
luxurybeltsoutlets.com	wumengjie2012@hotmail.com
lvbagsoutlet002.com	sjkwc@163.com
monogrambagsonline.com	paypalfang@ymail.com
netebuy.net	aitaobaobao2008@sina.cn
newfashiontrade.com	vipshop999@gmail.com
replicabags-jerseys.com	michaelhzt@qq.com
replica-louisvuitton-bags.org	angeladennis168@gmail.com ⁶
louisvuitton-neverfullm.info	zhengji@gmail.com
repicalouisvuittonluggageoutlets.com	davidcassandra168@gmail.com
shopvoguebags.com	fashionbagsuk@yahoo.com
superqualityfashion.net	lutusd52@yahoo.com
womenspursestore.com	chenyaoyin2012@gmail.com
worldluxurytrade.com	worldluxurytrade@hotmail.com

likely to be confused by Defendants' advertisement, promotion, sale, offer for sale, A. Plaintiff has a very strong probability of proving at trial that consumers are

Restraint Order support the following conclusions of law:

The declarations Plaintiff submitted in support of its Application for Temporary

III. ANALYSIS

Cnty, etc., 415 U.S. 423, 439 (1974).

Foods, Inc. v. Brotherhood of Teamsters & Auto Truck Drivers Local No. 70 of Almeida

harm just so long as is necessary to hold a hearing and no longer." *Granny Goose*

servicing their underlying purpose of preserving the status quo and preventing irreparable

FED. R. CIV. P. 65(b). *Ex parte* temporary restraining orders "should be restricted to

be required. (A) specific facts in an affidavit or a verified complaint clearly show that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition [and] (B) the movant's attorney certifies in writing any efforts made to give notice and the reasons why it should not

adverse party or its attorney if:

Additionally, a court may only issue a temporary restraining order without notice to the

(11th Cir. 1995) (applying the test to a preliminary injunction in a Lanham Act case).

Cir. 2005); see also *Levi Strauss & Co. v. Sunrise Int'l. Trading Inc.*, 51 F. 3d 982, 985

the public interest." *Schiavo ex. rel Schindler v. Schiavo*, 403 F.3d 1223, 1225-26 (11th

the relief would inflict on the non-movant; and (4) that the entry of the relief would serve

be suffered if the relief is not granted; (3) that the threatened injury outweighs the harm

[there is] a substantial likelihood of success on the merits; (2) that irreparable injury will

In order to obtain a temporary restraining order, a party must demonstrate "(1)

II. LEGAL STANDARD

Defendants on this Application for Temporary Restraining Order, Defendants can easily

3. There is good cause to believe that if Plaintiff proceeds on notice to

that Plaintiff may suffer loss of sales for its genuine products;

are likely to be misled, confused, and disappointed by the quality of these products; and

products bearing Plaintiff's trademarks will appear in the marketplace; that consumers

2. There is good cause to believe that more counterfeit and infringing

bearing counterfeit and infringing trademarks in violation of Plaintiff's rights;

holders, belts, shirts, shoes, scarves, neckties, watches, jewelry, and sunglasses

advertise, promote, offer for sale, and sell, at least handbags, wallets, luggage, key

1. Defendants own or control Internet website businesses which

ex parte relief is granted:

consumers before Defendants can be heard in opposition unless Plaintiff's request for

that immediate and irreparable loss, damage, and injury will result to Plaintiff and to

Application for Temporary Restraining Order, and accompanying declarations on file,

clearly appears from the following specific facts, as set forth in Plaintiff's Complaint,

suffer immediate and irreparable injury if a temporary restraining order is not granted. It

B. Because of the infringement of the Louis Vuitton Marks, Plaintiff is likely to

belts, shirts, shoes, scarves, neckties, watches, jewelry, and sunglasses.

bear copies of the Louis Vuitton Marks on handbags, wallets, luggage, key holders,

products Defendants are selling and promoting are copies of Plaintiff's products that

reproductions, and/or colorable imitations of the Louis Vuitton Marks, and that the

scarves, neckties, watches, jewelry, and sunglasses bearing counterfeits,

and/or distribution of handbags, wallets, luggage, key holders, belts, shirts, shoes,

and quickly transfer the registrations for many of the Subject Domain Names, or modify registration data and content, change hosts, and redirect traffic to other websites, thereby thwarting Plaintiff's ability to obtain meaningful relief;

C. The balance of potential harm to Defendants in restraining their trade in counterfeit and infringing branded goods if a temporary restraining order is issued is far outweighed by the potential harm to Plaintiff, its reputation and goodwill as a manufacturer and distributor of quality products, if such relief is not issued; and

D. The public interest favors issuance of the temporary restraining order in order to protect Plaintiff's trademark interests and protect the public from being defrauded by the palming off of counterfeit goods as genuine goods of Plaintiff.

E. Under 15 U.S.C. § 1117(a), Plaintiff may be entitled to recover, as an equitable remedy, the illegal profits gained through Defendants' distribution and sales of handbags, wallets, luggage, key holders, belts, shirts, shoes, scarves, neckties, watches, jewelry, and sunglasses bearing counterfeits and infringements of the Louis Vuitton Marks. See *Reebok Int'l, Ltd. v. Mamatech Enters., Inc.*, 970 F.2d 552, 559 (9th Cir. 1992) (quoting *Fuller Brush Products Co. v. Fuller Brush Co.*, 299 F.2d 772, 777 (7th Cir. 1962) ("An accounting of profits under § 1117(a) is not synonymous with an award of monetary damages: '[a]n accounting for profits . . . is an equitable remedy subject to the principles of equity.'")

F. Requesting equitable relief "invokes the district court's inherent equitable powers to order preliminary relief, including an asset freeze, in order to assure the availability of permanent relief." *Levi Strauss & Co. v. Sunrise Int'l Trading Inc.*, 51 F.3d

any confusingly similar trademarks, on or in connection with all Internet websites owned notice of this Order shall immediately discontinue the use of the Louis Vuitton Marks or distributors, and all persons in active concert or participation with any Defendant having Each Defendant, its officers, directors, employees, agents, subsidiaries, (2)

- b. From secreting, concealing, destroying, selling off, transferring, or otherwise disposing of: (i) any products, not manufactured or distributed by Plaintiff, bearing the Louis Vuitton Marks, or any confusingly similar trademarks; or (ii) any evidence relating to the manufacture, importation, sale, offer for sale, distribution, or transfer of any products bearing the Louis Vuitton Marks, or any confusingly similar trademarks.
- a. From manufacturing, importing, advertising, promoting, offering to sell, selling, distributing, or transferring any products bearing the Louis Vuitton Marks, or any confusingly similar trademarks, other than those actually manufactured or distributed by Plaintiff; and

notice of this Order are hereby temporarily restrained:

distributors, and all persons in active concert or participation with any Defendant having Each Defendant, its officers, directors, employees, agents, subsidiaries, (1)

Restraint Order is hereby **GRANTED** [DE 4] as follows:

ORDERED AND ADJUDGED that Plaintiff's Application for Temporary

For the foregoing reasons, it is

IV. CONCLUSION

jurisdiction of this Court unless those assets are restrained. and Defendants' blatant violation of the federal trademark laws, Plaintiff has good reason to believe Defendants will hide or transfer their ill-gotten assets beyond the In light of the inherently deceptive nature of the counterfeiting business, G.

Gas Corp., 748 F.2d 1431, 1433-34 (11th Cir. 1984)).

982, 987 (11th Cir. 1995) (citing *Federal Trade Commission v. United States Oil and*

not assist in changing the Registrars of Record for the domains under their respective Registrar of Plaintiff's choosing (the "New Registrar"). To the extent the Registrars do by Plaintiff have been or will be dismissed from this action, to a holding account with a excepting any such domain names which such Registrars have been notified in writing immediately assist in changing the Registrar of record for the Subject Domain Names, (6) The domain name Registrars for the Subject Domain Names shall

the Subject Domain Names;

to transfer to Plaintiff's counsel, for deposit with this Court, domain name certificates for (5) The domain name Registrars for the Subject Domain Names are directed

Names during the pendency of this Action, or until further Order of the Court;

(4) Each Defendant shall not transfer ownership of the Subject Domain

Subject Domain Names;

or operated by each Defendant, including the Internet websites operating under the computer user or serves to direct computer searches to websites registered by, owned, or cache memory, and any other form of use of such terms which is visible to a any web page), any advertising links to other websites, from search engines' databases markers within website source code, from use on any webpage (including as the title of any confusingly similar trademarks within domain name extensions, metatags or other notice of this Order shall immediately discontinue the use of the Louis Vuitton Marks, or distributors, and all persons in active concert or participation with any Defendant having (3) Each Defendant, its officers, directors, employees, agents, subsidiaries,

Subject Domain Names;

and operated, or controlled by them including the Internet websites operating under the

control within one (1) business day of receipt of this Order, the top-level domain (TLD) Registries (or their administrators) for the Subject Domain Names, within five (5) business days of receipt of this Order, shall, change or assist in changing, the Registrar of record for the Subject Domain Names, excepting any such domain names which such Registries have been notified in writing by Plaintiff have been or will be dismissed from this action, to a holding account with the New Registrar. As a matter of law, this Order shall no longer apply to any Defendant or associated domain name dismissed from this action. Upon the change of the Registrar of record for the Subject Domain Names, the New Registrar will maintain access to the Subject Domain Names in trust for the Court during the pendency of this action. Additionally, the New Registrar shall immediately institute a temporary 302 domain name redirection which will automatically redirect any visitor to the Subject Domain Names to the following Uniform Resource Locator ("URL") <http://servinnotice.com/lvpp3/index.html> whereon copies of the Complaint and all other documents on file in this action are displayed. Alternatively, the New Registrar may update the Domain Name System ("DNS") data it maintains for the Subject Domain Names, which link the domain names to the IP addresses where their associated websites are hosted, to NS1.MEDIATEMPLATE.NET and NS2.MEDIATEMPLATE.NET, which will cause the domain names to resolve to the website where copies of the Complaint, Temporary Restraining Order, and all other documents on file in this action are displayed. After the New Registrar has effected this change, the Subject Domain Names shall be placed on Lock status, preventing the modification or deletion of the domains by the New Registrar or Defendants;

pingjuly@hotmail.com
okshop2009@hotmail.com
christopherada121@gmail.com
goodbuyline@gmail.com <input type="checkbox"/>
well5063@yahoo.com <input type="checkbox"/>
2496711347@qq.com <input type="checkbox"/>
usahandbagsoutlet@gmail.com <input type="checkbox"/>
xiang7793@hotmail.com <input type="checkbox"/>
yzhqtrade@hotmail.com <input type="checkbox"/>
z19622688@163.com <input type="checkbox"/>
xia08313@gmail.com <input type="checkbox"/>
yeijung1986@163.com <input type="checkbox"/>

to the PayPal account recipients:

account activity, in or which hereafter are transmitted into the PayPal accounts related companies and affiliates shall immediately freeze all funds, as opposed to ongoing (10) Upon receipt of notice of this Order, PayPal, Inc. ("PayPal") and its related

deleted before the entry of this Order;

computer files relating to the use of the Subject Domain Names that may have been use of any of the Subject Domain Names and shall take all steps necessary to retrieve (9) Each Defendant shall preserve copies of all computer files relating to the

website and thereby evade the provisions of this Order;

Defendants which redirect traffic to the counterfeit operations to a new domain name or Tools and cancel any redirection of the domains that have been entered there by (8) Plaintiff may enter the Subject Domain Names into Google's Webmaster

true identities and contact information of those Registrants;

the Registrant's identity and contact information are ordered to disclose to Plaintiff the Domain Names for which the Registrant uses such privacy protection service to conceal (7) Upon Plaintiff's request, the privacy protection service for any Subject

christopherada121@gmail.com
okshop2009@hotmail.com
pingjuly@hotmail.com

the Court all funds in all PayPal accounts related to the PayPal account recipients:

(11) PayPal shall also immediately divert to a holding account for the trust of

identified on Schedule "A" hereto;

(iii) any other PayPal accounts tied to or used by any of the Subject Domain Names institution account(s), and/or any of the other PayPal accounts subject to this Order; and same customer(s), (ii) any other accounts which transfer funds into the same financial as well as all funds in or which are transmitted into (i) any other related accounts of the

1677576386@qq.com
oilpainting1986@hotmail.com
garra37472006@hotmail.com
274697833@qq.com
brantatrice769@gmail.com
annabeauty84@yahoo.com
1786291408@qq.com
allisondick152@gmail.com
annachen1897@gmail.com
businessshonor@yahoo.com
kentyfang@hotmail.com
wumengjie2012@hotmail.com
sjkwc@163.com
paypalfang@ymail.com
aitaobaoba2008@sina.cn
vipshop999@gmail.com
michaehzt@qq.com
angeladennis168@gmail.com
zhengji@gmail.com
davidcassandra168@gmail.com
fashionbagsuk@yahoo.com
rufusd52@yahoo.com
chenyaoyin2012@gmail.com
worldluxurytrade@hotmail.com

restained and identifies the PayPal account(s) which the restrained funds are related provide Plaintiff's counsel with all data which details (i) an accounting of the total funds (12) PayPal shall further, within five business days of receiving this Order,

and any other related accounts of the same customer(s) subject to this Order;

<input type="checkbox"/> goodbuyline@gmail.com
<input type="checkbox"/> well5063@yahoo.com
<input type="checkbox"/> 2496711347@qq.com
<input type="checkbox"/> ushandbagsoutlet@gmail.com
<input type="checkbox"/> xiang7793@hotmail.com
<input type="checkbox"/> yzhttrade@hotmail.com
<input type="checkbox"/> z19622688@163.com
<input type="checkbox"/> xiao8313@gmail.com
<input type="checkbox"/> yeilijung1986@163.com
<input type="checkbox"/> 1677576386@qq.com
<input type="checkbox"/> oilpainting1986@hotmail.com
<input type="checkbox"/> garra37472006@hotmail.com
<input type="checkbox"/> 274697833@qq.com
<input type="checkbox"/> brantatrice769@gmail.com
<input type="checkbox"/> annabeauty84@yahoo.com
<input type="checkbox"/> 1786291408@qq.com
<input type="checkbox"/> allisondick152@gmail.com
<input type="checkbox"/> annachen1897@gmail.com
<input type="checkbox"/> businessshonor@yahoo.com
<input type="checkbox"/> kentyang@hotmail.com
<input type="checkbox"/> wumengjie2012@hotmail.com
<input type="checkbox"/> sjkwc@163.com
<input type="checkbox"/> paypalfang@ymail.com
<input type="checkbox"/> aitaobaoba2008@sina.cn
<input type="checkbox"/> vipshop999@gmail.com
<input type="checkbox"/> michaelhzt@qq.com
<input type="checkbox"/> angeladennis168@gmail.com
<input type="checkbox"/> zhengji@gmail.com
<input type="checkbox"/> davidcassandra168@gmail.com
<input type="checkbox"/> fashionbagsuk@yahoo.com
<input type="checkbox"/> rufusd52@yahoo.com
<input type="checkbox"/> chenyaoyin2012@gmail.com
<input type="checkbox"/> worldluxurytrade@hotmail.com

Restraint Order, this Order, and all other pleadings and documents on file in this

(16) Plaintiff shall serve a copy of the Complaint, the Application for Temporary

Court will hear argument on Plaintiff's requested preliminary injunction;

the appropriateness of this Order and move to dissolve the same and at which time the

appropriate, at which time Defendants and/or any other affected persons may challenge

November 2, 2012, at 10:00 a.m., or at such other time that this Court deems

at 299 East Broward Blvd, Ft. Lauderdale, Florida 33301, Courtroom 203, on

(15) A hearing is set before this Court in the United States Courthouse located

\$10,000.00;

bond may be subject to increase should the amount of the funds seized exceed

pendency of this action, or until further Order of the Court. In the Court's discretion, the

to which Defendants may be entitled for a wrongful injunction or restraint, during the

amount of Ten Thousand Dollars and Zero Cents (\$10,000.00), as payment of damages

(14) Pursuant to 15 U.S.C. § 1116(d)(5)(D), Plaintiff shall post a bond in the

dates as set by the Court or stipulated to by the parties;

the hearing on the Motion for Preliminary Injunction set forth below, or until such further

(13) This Temporary Restraining Order shall remain in effect until the date for

Court;

receive and maintain this Order and its contents as confidential until further order of this

account owners or the financial institutions until further order of this Court. PayPal shall

of the related financial institution account information shall be made without notice to the

account(s) which have been restrained. Such restraining of the funds and the disclosure

too, and (ii) the account transactions related to all funds transmitted into the PayPal

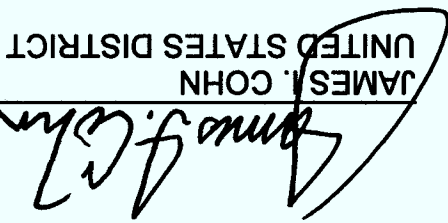
(17) Any response or opposition to Plaintiff's Motion for Preliminary Injunction must be filed and served on Plaintiff's counsel by October 29, 2012, which is and filed with the Court, along with Proof of Service. Plaintiff shall file any Reply Memorandum on or before October 31, 2012. The above dates may be revised upon stipulation by all parties and approval of this Court. Defendants are hereby on notice that failure to appear at the hearing may result in the imposition of a preliminary injunction against them pursuant to 15 U.S.C. § 1116(d), Fed. R. Civ. P. 65, and this Court's inherent authority.

calculated to give notice which is permitted by the Court.

at <http://servinnotice.com/lvpp3/index.html> or by other means reasonably documents on file in this matter to Defendants by regularly updating the website located Plaintiff shall continue to provide notice of these proceedings and copies of the account, and such notice so given shall be deemed good and sufficient service thereof. the Subject Domain Names being changed to the Court via the New Registrar's holding <http://servinnotice.com/lvpp3/index.html>, within forty-eight (48) hours of control of well as all other documents filed in this action on the website located at of the Complaint, the Application for Temporary Restraining Order, and this Order, as record for each of their respective domain names. In addition, Plaintiff shall post a copy on Schedule "B" hereto, and provide a copy of the Order by e-mail to the registrar of addresses used to communicate with Plaintiff's investigator, all of which are identified domain names, or (ii) on their Internet websites, and the customer service e-mail Defendants (i) as part of the domain registration data for each of their respective action on each Defendant via the corresponding e-mail addresses provided by

DONE AND ORDERED in chambers in Fort Lauderdale, Florida, this 24th day of

October, 2012 at 5:30 p.m.



JAMES I. COHN
UNITED STATES DISTRICT JUDGE

Copies provided to:
Counsel of Record via CM/ECF

**SCHEDULE "A"
DEFENDANTS BY NUMBER AND SUBJECT DOMAIN NAMES**

Defendant Number	Defendant / Subject Domain Name(s)
Defendant 1	bags-watch-replicas.org bags-watch-replicas.biz bags-watch-replicas.net
Defendant 2	bestreplicawatches.us
Defendant 3	brandapparelstore.com
Defendant 4	cheaplouisvuittonhandbagsreplica.com
Defendant 5	cheaplouisvuittonsaleoutlet.com louisvuittonpursesoutletonlines.com
Defendant 6	chinawholesale123.com
Defendant 7	cnwholesalebiz.com cnwholesalebiz.net
Defendant 8	ebaylvoutlet.com
Defendant 9	fakelouisvuittonhandbag.com
Defendant 10	goodsabc.com
Defendant 11	happychinatrade.com chinatradeok.com
Defendant 12	inchinashoes.com
Defendant 13	ineasybiz.com ineasybiz.net
Defendant 14	louisvuitton-bags-online.com
Defendant 15	louisvuittondesignershop.com
Defendant 16	louis-vuittonhandbagsonsale.com
Defendant 17	louisvuitton-hermes.com
Defendant 18	louisvuittonimitationhandbags.com
Defendant 19	louis-vuittonnordstrom.com
Defendant 20	louisvuittonoutlet2.net

Defendant Number	Defendant / Subject Domain Name(s)
Defendant 21	louisvuittonoutletjust.com
Defendant 22	louisvuittonusd.com
Defendant 23	luxurybeltsoutlets.com
Defendant 24	lvbagsoutlet002.com
Defendant 25	monogrambagsonline.com
Defendant 26	netbuy.net
Defendant 27	newfashiontrade.com
Defendant 28	replicabags-jerseys.com
Defendant 29	replica-louisvuitton-bags.org replica-louisvuittonbags.org louisvuitton-neverfullmm.info
Defendant 30	repicalouisvuittonluggageoutlets.com repicalouisvuittonluggageoutlet.com
Defendant 31	repicalouisvuittonpurses.org
Defendant 32	shopvoguebags.com
Defendant 33	superqualityfashion.net
Defendant 34	womenspursestore.com
Defendant 35	worldluxurytrade.com

**SCHEDULE "B"
 DEFENDANT PARTNERSHIPS OR UNINCORPORATED ASSOCIATIONS
 BY SUBJECT DOMAIN NAME AND ASSOCIATED E-MAIL ADDRESSES**

Def. No.	Domain Name	E-Mail Addresses
1	bags-watch-replicas.org	pingjuly@hotmail.com
	bags-watch-replicas.biz	bagswatchescom@gmail.com
	bags-watch-replicas.net	good1111@163.com
2	bestreplicawatches.us	goodbuyline@gmail.com
		allabawatches@gmail.com
3	brandapparelstore.com	service@bestreplicawatches.us
		fgqianlong@163.com
4	cheaplouisvuittonhandbagsreplica.com	well5063@yahoo.com
		vipshoesclothing@hotmail.com
5	cheaplouisvuittonsaleoutlet.com	vipshoesclothing@gmail.com
		cheapplaza@hotmail.com
6	louisvuittonpursesoutletonlines.com	2496711347@qq.com
		eluxury-discount@hotmail.com
7	chinawholesale123.com	eluxury_discount@yahoo.com
		replicacalouisvuittonhandbags2012@hotmail.com
8	cheaplouisvuittonsaleoutlet.com	om
		eluxury-vipcustomersevice06@hotmail.com
9	louisvuittonpursesoutletonlines.com	usahandbagsoutlet@gmail.com
		trademail@gmail.com
10	louisvuittonpursesoutletonlines.com	louisvuittonoutletwebsite@hotmail.com
		82328285@qq.com
11	louisvuittonpursesoutletonlines.com	xiang7793@hotmail.com
		ca1080501@hotmail.com
12	louisvuittonpursesoutletonlines.com	ca1080501@yahoo.cn
		jordanshoesell@yahoo.cn
13	louisvuittonpursesoutletonlines.com	yzhqtrade@hotmail.com
		398230209@qq.com
14	louisvuittonpursesoutletonlines.com	domain@diyworld.com
		z19622688@163.com
15	louisvuittonpursesoutletonlines.com	Ebaybagsshop@gmail.com
		serviceemailstro@gmail.com
16	louisvuittonpursesoutletonlines.com	!0!h5pr4fbb7d2d3f6a@t02cdv4f7f9a255f
		64.privatewhois.net
17	louisvuittonpursesoutletonlines.com	okshop2009@hotmail.com
		service2u01@hotmail.com
18	louisvuittonpursesoutletonlines.com	wangfeng1102@hotmail.com

Def. No.	Domain Name	E-Mail Addresses
10	goodsabc.com	xiao8313@gmail.com nikewww@hotmail.com cn hengwei@yahoo.com.cn
11	happychinatrade.com	yeijung1986@163.com ceotrade1@hotmail.com ceotrade1@yahoo.com chinatrade@hotmail.com shunxingtrade@yahoo.cn
	chinatradeok.com	domain@diyworld.com 1677576386@qq.com alice-lee1986@hotmail.com alicealice58@yahoo.cn domain@diyworld.com
12	inchinashoes.com	oilpainting1986@hotmail.com ineasybiz@hotmail.com ineasybiz01@gmail.com ineasybiz@yahoo.cn ayuzhiyong@163.com domain@diyworld.com
	ineasybiz.net	
13	ineasybiz.com	garra37472006@hotmail.com designerbagsshop@gmail.com weree@163.com
14	louisvuitton-bags-onlineshop.com	274697833@qq.com customer-service@mr-bryant.com lishaoyang365@126.com
15	louisvuittondesignershop.com	brantatrice769@gmail.com lv.customeronline@gmail.com sdate89@163.com
16	louis-vuittonhandbagsonsale.com	annabeauty84@yahoo.com 348490619@qq.com
17	louisvuitton-hermes.com	1786291408@qq.com eluxury-discount@hotmail.com eluxury-discount@yahoo.com replicailouisvuittonhandbags2012@hotmail.com om eluxury-vipcustomer-service- h18@hotmail.com
18	louisvuittonimitationhandbags.com	
19	louis-vuittonnordstrom.com	allisondick152@gmail.com customer-service5.lv@gmail.com dhvndbb@163.com
20	louisvuittonoutlet2.net	annachen1897@gmail.com

Def. No.	Domain Name	E-Mail Addresses
21	louisvuittonoutletjust.com	businessshonor@yahoo.com service_center-1@hotmail.com 501e7deu0bm1miu@t02cdv47f99a255f6 4.privatewhois.net
22	louisvuittonusd.com	kentfang@hotmail.com louisvuittonusd@hotmail.com 48977068@qq.com
23	luxurybeltsoutlets.com	wumengjie2012@hotmail.com luxurybeltsoutlets@yahoo.com order-service4you@hotmail.com hookhot2010@126.com
24	lvbagsoutlet02.com	sjkjc@163.com lee336600@gmail.com lvbagsoutlet001@gmail.com overseastrade@126.com
25	monogrambagsonline.com	paypalfang@ymail.com superchinacart@gmail.com frank2006044@126.com
26	netbuy.net	aitaobaobaoc2008@sina.cn netbuy2008@gmail.com netbuy_net@yahoo.com.cn qg550367@hotmail.com
27	newfashiontrade.com	vipshop999@gmail.com millionmerchant@hotmail.com domain@diyworld.com
28	replicabags-jerseys.com	michaehzht@qq.com chinatewn_1@hotmail.com domain@diyworld.com
29	replica-louisvuittonbags.org	christopherada121@gmail.com angeladennis168@gmail.com lv.customeronline@gmail.com lv.onlinestore@gmail.com edstanton24@hotmail.com tammysue760@hotmail.com cliffaice@hotmail.com
30	replica-louisvuittonluggageoutlets.com	zhengji@gmail.com liaozenh666@gmail.com worktrade@163.com
31	repicalouisvuittonpurses.org	davidcassandra168@gmail.com lv.customeronline@gmail.com joanevelyn@163.com
32	shopvoguebags.com	fashionbagsuk@yahoo.com shopvoguebagsale@gmail.com shopvoguenks@yahoo.com

Def. No.	Domain Name	E-Mail Addresses
33	superqualityfashion.net	rufusd52@yahoo.com info@superqualityfashion.net superqualityfashion.net@contactprivacy.com
34	womenspursestore.com	chenyaoyin2012@gmail.com womenspursestore@hotmail.com
35	worldluxurytrade.com	worldluxurytrade@hotmail.com copyoriginals@hotmail.com angeliangjing@hotmail.com