

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 14-62191-CIV-ROSENBERG/BRANNON**

CHANEL, INC.,

Plaintiff,

vs.

BESTBUYHANDBAG.COM, *et al.*,

Defendants.

**ORDER GRANTING PLAINTIFF'S APPLICATION
FOR PRELIMINARY INJUNCTION**

THIS CAUSE came before the Court upon Plaintiff's Application for Preliminary Injunction (the "Application for Preliminary Injunction"), ECF No. [5], dated September 24, 2014. The Court has carefully considered the Application for Preliminary Injunction, the record in this case, and the applicable law, and is otherwise fully advised in the premises.


By the instant Application, Plaintiff, Chanel, Inc. ("Plaintiff") moves for entry of a preliminary injunction against Defendants¹ for alleged violations of the Lanham Act, 15 U.S.C. §§ 1114 and 1125(a).

The Court convened a hearing on December 16, 2014, which was attended by counsel for Plaintiff only. During the hearing, Plaintiff directed the Court to evidence supporting the Application for Preliminary Injunction. Defendants have not responded to the Application for Preliminary Injunction, nor have they made any filing in this case, nor have Defendants appeared in this matter either individually or through counsel. Because Plaintiff has satisfied the requirements for the issuance of a preliminary injunction, the Court grants Plaintiff's Application for Preliminary Injunction.





¹ Defendants are the Individuals, Partnerships or Unincorporated Associations identified on Schedule "A" hereto and Does 1-10 (collectively "Defendants").




I. FACTUAL BACKGROUND²

Plaintiff is the registered owner of the following trademarks registered on the Principal Register of the United States Patent and Trademark Office (collectively, the “Chanel Marks”):

Trademark	Registration Number	Registration Date	Class(es)/Goods
CHANEL	0,612,169	September 13, 1955	(Int’l Class: 14) Necklaces
CHANEL	0,626,035	May 1, 1956	(Int’l Class: 18) Women’s handbags
CHANEL	0,906,262	January 19, 1971	(Int’l Class: 25) Coats, suits, blouses, and scarves
CHANEL	0,955,074	March 13, 1973	(Int’l Class: 14) Watches
	1,241,264	June 7, 1983	(Int’l Class: 25) Suits, jackets, skirts, dresses, pants, blouses, tunics, sweaters, cardigans, tee-shirts, coats, raincoats, scarves, shoes and boots
CHANEL	1,241,265	June 7, 1983	(Int’l Class: 25) Suits, jackets, skirts, dresses, pants, blouses, tunics, sweaters, cardigans, coats, raincoats, scarves, shoes and boots
CHANEL	1,348,842	July 16, 1985	(Int’l Class: 3) Full line of perfumery, cosmetics and toiletries

² The factual background is taken from Plaintiff’s Complaint, ECF No. [1], Application for Preliminary Injunction, ECF No. [5], and supporting evidentiary submissions. Plaintiff filed declarations and exhibits annexed thereto in support of its Application for Preliminary Injunction. The declarations are available in the docket at the following entries: Declaration of Adrienne Hahn Sisbarro, ECF No. [5-1], Declaration of Stephen M. Gaffigan, ECF No. [5-8], and Declaration of Eric Rosaler, ECF No. [5-14].

Trademark	Registration Number	Registration Date	Class(es)/Goods
	1,501,898	August 30, 1988	(Int'l Class: 6) Keychains (Int'l Class: 14) Costume jewelry (Int'l Class: 16) Gift wrapping paper (Int'l Class: 25) Blouses, shoes, belts, scarves, jackets, men's ties (Int'l Class: 26) Brooches, buttons for clothing
CHANEL	1,510,757	November 1, 1988	(Int'l Class: 9) Sunglasses
	1,654,252	August 20, 1991	(Int'l Class: 9) Sunglasses
CHANEL	1,733,051	November 17, 1992	(Int'l Class: 18) Leather goods; namely, handbags, wallets, travel bags, luggage, business and credit card cases, change purses, tote bags, cosmetic bags sold empty, and garment bags for travel
	1,734,822	November 24, 1992	(Int'l Class: 18) Leather goods; namely, handbags, wallets, travel bags, luggage, business card cases, change purses, tote bags, and cosmetic bags sold empty
COCO MADEMOISELLE	2,557,185	April 2, 2002	(Int'l Class: 3) Perfumery and cosmetic products, namely eau de parfum and skin moisturizers
J12	2,559,772	April 9, 2002	(Int'l Class: 14) Timepieces; namely, Watches, and Parts Thereof
	3,025,934	December 13, 2005	(Int'l Class: 18) Handbags

Trademark	Registration Number	Registration Date	Class(es)/Goods
	3,025,936	December 13, 2005	(Int'l Class: 9) Eyeglass frames, sunglasses (Int'l Class: 25) Gloves, swimwear (Int'l Class: 26) Hair accessories namely barrettes
CHANEL	3,133,139	August 22, 2006	(Int'l Class: 14) Jewelry and watches
CHANEL	3,134,695	August 29, 2006	(Int'l Class: 9) Ski goggles, eyeglass frames, sunglasses, sunglass parts, cases for spectacles and sunglasses (Int'l Class: 25) Sun visors, swimwear, stockings and socks (Int'l Class: 26) Hair accessories namely barrettes (Int'l Class: 28) Bags specially adopted for sports equipment, skis, tennis rackets, tennis balls, tennis racket covers
CHANEL	3,890,159	December 14, 2010	(Int'l Class: 9) Cases for telephones (Int'l Class: 16) Temporary tattoos (Int'l Class: 18) Key cases
	4,074,269	December 20, 2011	(Int'l Class: 9) Protective covers for portable electronic devices, handheld digital devices, personal computers and cell phones (Int'l Class: 16) Temporary tattoos (Int'l Class: 18) Key cases
	4,241,822	November 13, 2012	(Int'l Class: 25) Clothing; namely, coats, jackets, dresses, tops, blouses, sweaters, cardigans, skirts, vests, pants, jeans, belts, swim wear, pareos, beach cover-ups, hats, sun visors, scarves, shawls, ties, gloves, footwear, hosiery and socks

See Hahn Decl., ECF No. [5-1] at ¶ 4; ECF No. [5-2] (containing Certificates of Registrations for the Chanel Marks at issue). The Chanel Marks are used in connection with the manufacture and distribution of goods in the categories identified above. *See* Hahn Decl., ECF No. [5-1] at ¶ 4.

Defendants, through the fully interactive, commercial Internet websites and ecommerce stores and auctions via Internet auction websites, operating under their domain names or seller identification names identified on Schedule “A” hereto (collectively, the “Subject Domain Names and Seller IDs”), have advertised, promoted, offered for sale, or sold, at least, handbags, wallets, shoes, boots, belts, brooches, scarves, sweaters, sunglasses, watches, cases for telephones, protective covers for portable electronic devices, including cell phones, perfumes, costume jewelry, including necklaces, bracelets, earrings, and rings, bearing what Plaintiff has determined to be counterfeits, infringements, reproductions, or colorable imitations of the Chanel Marks. *See* Hahn Decl., ECF No. [5-1] at ¶¶ 9, 11-15; Gaffigan Decl., ECF No. [5-8] at ¶¶ 2-3, 5; Rosaler Decl., ECF No. [5-14] at ¶¶ 4-6.

Although each Defendant may not copy and infringe each Chanel Mark for each category of goods protected, Plaintiff has submitted sufficient evidence showing that each Defendant has infringed, at least, one or more of the Chanel Marks. *See* Hahn Decl., ECF No. [5-1] at ¶¶ 11-15; ECF No. [5-2]. Defendants are not now, nor have they ever been, authorized or licensed to use, reproduce, or make counterfeits, reproductions, and/or colorable imitations of the Chanel Marks. *See* Hahn Decl., ECF No. [5-1] at ¶¶ 9, 13, 15.

Plaintiff retained AED Investigations, Inc., a licensed private investigative firm, to investigate the sale of counterfeit versions of Plaintiff’s products by Defendants. *See* Hahn Decl., ECF No. [5-1] at ¶ 10; Gaffigan Decl., ECF No. [5-8] at ¶ 5; Rosaler Decl., ECF No. [5-14] at ¶ 3.

Eric Rosaler (“Rosaler”), an officer of AED Investigations, Inc., accessed the commercial Internet based ecommerce stores operating under the Seller IDs identified in the table below, and placed orders for the purchases of various products, all bearing counterfeits of, at least, one of the Chanel Marks at issue in this action – and requested each order be shipped to his address in the Southern District of Florida. *See* Rosaler Decl., ECF No. [5-14] at ¶ 4. Rosaler finalized payment for each of the Chanel branded products ordered via PayPal, Inc. (“PayPal”) to Defendants’ respective PayPal accounts as follows:

Seller ID	Chanel Branded Item Purchased	PayPal Account
caylajewel	earrings	natalianugroho@hotmail.com
glasses21000	sunglasses	graysome512@outlook.com
michaelwang	perfume	tleisi1019@126.com
smsd14717	cufflinks	jsmh219@163.com

See Rosaler Decl., ECF No. [5-14] at ¶ 4. Subsequently, Rosaler received the Chanel branded sunglasses and perfume he ordered from Defendants via glasses21000 and michaelwang, respectively, and sent the sunglasses and perfume together with the detailed web page listings, photographs of the Chanel branded products, and the Chains of Custody to Plaintiff for review and analysis. *Id.*; Hahn Decl., ECF No. [5-1] at ¶¶ 11-12.

Rosaler also accessed the Internet websites operating under the Subject Domain Names, as identified on the table attached hereto as Schedule “C-1,” and went through the purchasing process³ for various products bearing counterfeits of, at least, one of the Chanel Marks at issue in this action. *See* Rosaler Decl., ECF No. [5-14] at ¶ 5. Following the submission of his orders, Rosaler received information for finalizing payment for each of the Chanel branded items

³ Rosaler intentionally did not finalize his purchases from the Internet websites so as to avoid contributing funds to Defendants’ coffers. *See* Rosaler Decl., ECF No. [5-14] at ¶ 5, n.1; Gaffigan Decl., ECF No. [5-8] at ¶ 5.

ordered via PayPal and/or bank transfer to Defendants' respective PayPal and/or bank accounts, which are also identified on Schedule "C-1" hereto. *Id.*

Rosaler further accessed the Internet based ecommerce stores and auctions associated with Defendants' Seller IDs, as identified on the table attached hereto as Schedule "C-2," and went through the purchasing process⁴ for various products bearing counterfeits of, at least, one of the Chanel Marks at issue in this action. *See* Rosaler Decl., ECF No. [5-14] at ¶ 6. Following the submission of his orders, Rosaler received information for finalizing payment for each of the Chanel branded items ordered via PayPal to Defendants' respective PayPal accounts, which are also identified on Schedule "C-2" hereto. *Id.*

Additionally, Chanel's counsel, Stephen M. Gaffigan, Esq. ("Gaffigan"), accessed the Internet based ecommerce store associated with the Defendant's Seller ID, as identified on the table attached hereto as Schedule "C-3," and went through the purchasing process for a handbag bearing counterfeits of, at least, one of the Chanel Marks at issue in this action. *See* Gaffigan Decl., ECF No. [5-8] at ¶ 3. Although the purchase was never finalized, Gaffigan received information for finalizing payment for the Chanel branded handbag he ordered via PayPal to Defendant's PayPal account, which is also identified on Schedule "C-3" hereto. *Id.*

The detailed web page listings and images of the Chanel branded earrings, sunglasses, perfume, and cufflinks purchased by Rosaler from Defendants via caylajewel, glasses21000, michaelwang, and smsd14717, respectively, as well as the sunglasses and perfume received by Rosaler via glasses21000 and michaelwang together with photographs of same, were reviewed by Plaintiff's representative who determined the products to be non-genuine, unauthorized

⁴ Rosaler intentionally did not finalize his purchases from the Internet based ecommerce stores and auctions so as to avoid contributing funds to Defendants' coffers. *See* Rosaler Decl., ECF No. [5-14] at ¶ 6, n.5; Gaffigan Decl., ECF No. [5-8] at ¶ 5.

Chanel products. *See* Hahn Decl., ECF No. [5-1] at ¶¶ 11-12, 15. Plaintiff's representative also reviewed and visually inspected Defendants' websites and ecommerce stores and auctions, as well as pictures of items bearing the Chanel Marks offered for sale by Defendants via their Subject Domain Names and Seller IDs, and likewise determined the products were not genuine Chanel goods. *See id.* at ¶¶ 13, 15.

On September 23, 2014, Plaintiff filed its Complaint, ECF No. [1], against Defendants for trademark counterfeiting and infringement, false designation of origin, and common law unfair competition. On September 24, 2014, Plaintiff filed its *Ex Parte* Application for Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets, ECF No. [5]. On November 21, 2014, this Court entered a sealed Temporary Restraining Order, ECF No. [11], enjoining Defendants from, among other actions, continuing to manufacture, promote, and/or sell any product bearing Plaintiff's alleged infringed trademarks. The Temporary Restraining Order also directed PayPal to restrain funds in payment accounts associated with Defendants and to transfer those funds to a holding account.

On December 2, 2014, Plaintiff filed a Notice of Inability to Serve Defendants, ECF No. [13], and simultaneously filed its Motion to Extend Temporary Restraining Order, dated November 21, 2014, and to Continue Hearing Scheduled for December 5, 2014 in Connection with Plaintiff's Application for Preliminary Injunction, ECF No. [14], to avoid prejudicing Defendants' right to appear and respond in a timely fashion, because Plaintiff's counsel had not received confirmation from PayPal that Defendants' accounts had been restrained. On December 4, 2014, this Court entered an Order Granting Plaintiff's Motion to Extend Temporary Restraining Order and to Continue Hearing in Connection with Plaintiff's Application for Preliminary Injunction, ECF No. [16], continuing the hearing on Plaintiff's Application for

Preliminary Injunction until December 16, 2014. Pursuant to the Court's November 21, 2014 and December 4, 2014 Orders, Plaintiff provided Defendants with notice of the new hearing date and copies of the Court's November 21, 2014 Temporary Restraining Order and Plaintiff's *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets via e-mail to each Defendant's corresponding e-mail address, and by posting copies of the same on the website located at <http://servingnotice.com/omg18/index.html>. Thereafter, Certificates of Service were filed confirming service on each Defendant, ECF Nos. [18, 19, 20, and 21].

II. LEGAL STANDARD

To obtain a preliminary injunction, a party must demonstrate “(1) a substantial likelihood of success on the merits; (2) that irreparable injury will be suffered if the relief is not granted; (3) that the threatened injury outweighs the harm the relief would inflict on the non-movant; and (4) that the entry of the relief would serve the public interest.” *Schiavo ex. rel Schindler v. Schiavo*, 403 F.3d 1223, 1225-26 (11th Cir. 2005); *see also Levi Strauss & Co. v. Sunrise Int'l. Trading Inc.*, 51 F.3d 982, 985 (11th Cir. 1995).

III. ANALYSIS

The declarations Plaintiff submitted in support of its Application for Preliminary Injunction support the following conclusions of law:

A. Plaintiff has a strong probability of proving at trial that consumers are likely to be confused by Defendants' advertisement, promotion, sale, offer for sale, or distribution of goods bearing counterfeits, reproductions, or colorable imitations of the Chanel Marks, and that the products Defendants are selling and promoting for sale are copies of Plaintiff's products that bear copies of the Chanel Marks.

B. Because of the infringement of the Chanel Marks, Plaintiff is likely to suffer immediate and irreparable injury if a preliminary injunction is not granted. The following specific facts, as set forth in Plaintiff's Complaint, Application for Preliminary Injunction, and accompanying declarations on file, demonstrate that immediate and irreparable loss, damage, and injury will result to Plaintiff and to consumers because it is more likely true than not that:

1. Defendants own or control Internet websites, domain names, and/or ecommerce store and auction businesses which advertise, promote, offer for sale, and sell products bearing counterfeit and infringing trademarks in violation of Plaintiff's rights; and

2. There is good cause to believe that more counterfeit and infringing products bearing Plaintiff's trademarks will appear in the marketplace; that consumers are likely to be misled, confused, and disappointed by the quality of these products; and that Plaintiff may suffer loss of sales for its genuine products.

C. The balance of potential harm to Defendants in restraining their trade in counterfeit and infringing branded goods if a preliminary injunction 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 preliminary injunction in order to protect Plaintiff's trademark interests and protect the public from being defrauded by the palming off of counterfeit goods as Plaintiff's genuine goods.

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 goods bearing counterfeits and infringements of the Chanel Marks. *See Reebok Int'l, Ltd. v. Marnatech Enters.*,

Inc., 970 F.2d 552, 559 (9th Cir. 1992) (quoting *Fuller Brush Prods. 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 restraint, in order to assure the availability of permanent relief.” *Levi Strauss & Co. v. Sunrise Int’l Trading Inc.*, 51 F.3d 982, 987 (11th Cir. 1995) (citing *Federal Trade Commission v. United States Oil and Gas Corp.*, 748 F.2d 1431, 1433-34 (11th Cir. 1984)).

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

IV. CONCLUSION

Accordingly, after due consideration, it is hereby

ORDERED AND ADJUDGED that Plaintiff’s Application for Preliminary Injunction, ECF No. [5], is hereby **GRANTED** as follows:

(1) Each Defendant, its officers, directors, employees, agents, subsidiaries, distributors, and all persons in active concert or participation with any Defendant having notice of this Order are hereby restrained and enjoined until further Order of this Court as follows:

- a. From manufacturing, importing, advertising, promoting, offering to sell, selling, distributing, or transferring any products bearing the Chanel Marks, or any confusingly similar trademarks, other than those actually manufactured or distributed by Plaintiff; and
- b. From secreting, concealing, destroying, selling off, transferring, or otherwise disposing of: (i) any products, not manufactured or distributed

by Plaintiff, bearing the Chanel 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 Chanel Marks, or any confusingly similar trademarks.

(2) Each Defendant, its officers, directors, employees, agents, subsidiaries, distributors, and all persons in active concert or participation with any Defendant having notice of this Order shall immediately discontinue, until further Order of this Court, the use of the Chanel Marks or any confusingly similar trademarks, on or in connection with all Internet websites, domain names, and ecommerce store and auction website businesses owned and operated or controlled by them under their Subject Domain Names and Seller IDs;

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

(4) Each Defendant shall not transfer ownership of the Internet websites and Internet based ecommerce store and auction website businesses under their Subject Domain Names and Seller IDs during the pendency of this Action, or until further Order of the Court;

(5) The domain name Registrars for the Subject Domain Names are directed, to the extent not already done, to transfer to Plaintiff's counsel, for deposit with this Court, domain name certificates for the Subject Domain Names;

(6) Plaintiff may enter, and continue to enter, the Subject Domain Names into Google's Webmaster Tools and cancel any redirection of the domains that have been entered there by Defendants which redirect traffic to the counterfeit operations to a new domain name or website and thereby evade the provisions of this Order;

(7) The domain name Registrars for the Subject Domain Names shall immediately, to the extent not already done, assist in changing the Registrar of Record for the Subject Domain Names, excepting any such domain names which such Registrars have been notified in writing by Plaintiff have been or will be dismissed from this action, to a holding account with a Registrar of Plaintiff's choosing (the "New Registrar"). To the extent the Registrars do not assist in changing the Registrars of Record for the domains under their respective control within one (1) business day of receipt of this Order and instructions on the change of the Registrars of Record, 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://servingnotice.com/omg18/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.MEDIATEMPLE.NET and NS2.MEDIATEMPLE.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;

(8) Upon Plaintiff’s request, the privacy protection service for any Subject Domain Names for which the Registrant uses such privacy protection service to conceal the Registrant’s identity and contact information are ordered, to the extent not already done, to disclose to Plaintiff the true identities and contact information of those Registrants;

(9) Each Defendant shall preserve, and continue to preserve, copies of all computer files relating to the use of any of the Internet websites and Internet based ecommerce store and auction website businesses under their Subject Domain Names and Seller IDs and shall take all steps necessary to retrieve computer files relating to the use of the Internet websites and Internet based ecommerce store and auction website businesses under their Subject Domain Names and Seller IDs that may have been deleted before the entry of this Order;

(10) Upon receipt of notice of this Order, PayPal, Inc. (“PayPal”)⁵ and its related companies and affiliates shall, to the extent not already done, immediately restrain all funds, as opposed to ongoing account activity, in or which hereafter are transmitted into the PayPal accounts related to Defendants and associated e-mail addresses identified on Schedule “B” hereto and the following specific PayPal account recipients:

PayPal Accounts
sstoe8@yeah.net
natalianugroho@hotmail.com
graysome512@outlook.com
tleisi1019@126.com
jsmh219@163.com
chauderdana@live.com
terrycover@outlook.com
wz201468@163.com
meng2014621@163.com
qwer201476@163.com
quanshiai721@163.com
abdmarfashion@gmail.com
pinganfacai8888@163.com
sufengliu996@gmail.com
qingshanfacai86@hotmail.com
zhaoxiao6138wangxa@163.com
phitphibul@outlook.com
zhaoxiantong613@163.com
jinzhou0607@126.com
qingkongwanli0620@163.com
ligang2014705@126.com
lilanchun0710@126.com
lina20140726@126.com
yuanyang8hao@163.com
buyera0124@126.com
honghonghuohuo2008@126.com
parisfashionwu@126.com
lmno9000@163.com
dahai898@hotmail.com

⁵ PayPal is licensed to do business in the State of Florida by the Florida Office of the Controller and is therefore subject to personal jurisdiction in this Court. *See Gaffigan Decl.*, ECF No. [5-8] at ¶ 11; ECF No. [5-13].

shubao6231@hotmail.com
gangbi123@hotmail.com
xiaomin5868@126.com
fenvttamm@yahoo.cn
wriyuuy@163.com
qfsqmm@163.com
moonghy756@outlook.com
caviearez@gmail.com
takeilk@outlook.com
mada.madalina@outlook.com
qwqwqw77@outlook.com
changg98@126.com
gand76@126.com
yder96@126.com
youyou1992a@yeah.net
menghuia1988@yeah.net
sellerguoda@126.com
worldlin1258@126.com
ysg888usd@163.com
Pierrerolland@163.com
feixiang5673@163.com
feixiang56788@163.com
qianshuixiaoyu6591@126.com
zhonghuarenv999@hotmail.com
chongxinkaishi608@163.com
sf.englishai@outlook.com
ddlucks@yeah.net
ppone100@163.com
ppone20@163.com
liming20140422@gmail.com
hangzaishouqian12@163.com
hangzaishouqian14@163.com
hangzaishouqian20@163.com
madiqi1019@126.com
aukung_1@hotmail.com
mkmkkmkfhfhfh6849@163.com
tianjin5139@126.com
mafang8795@126.com
mali1097@163.com
hangzaishouqian28@163.com
fantasize043@126.com
kjehfrui@hotmail.com
zto9021zto@126.com

shyi20435@126.com
cibing21021@163.com
ttmon78721@163.com
kookg867@126.com
tancoo4211@163.com
cha2299tt@163.com
dongtian_2014@163.com
murenqing@hotmail.com
xxxiao613@126.com
xxxiao701@126.com
tianding2014@126.com
edcvfr2014@126.com
rertyu6tyt6@outlook.com
qiushewozui_99@163.com
chongsheng_985@126.com
haliluya_zanmei@163.com
yangjian19920203@163.com

as well as all funds in or which are transmitted into (i) any other related accounts of the same customer(s), (ii) any other accounts which transfer funds into the same financial institution account(s), or any of the other PayPal accounts subject to this Order; (iii) any other PayPal accounts tied to or used by any of the Subject Domain Names and Seller IDs identified on Schedule “A” hereto; and (iv) any other PayPal accounts associated with or related to the domain names or ecommerce stores and auctions, and e-mail addresses identified on Schedule “B” hereto;

(11) Upon receipt of notice of this Order, PayPal and its related companies and affiliates shall, to the extent not already done, immediately restrain all funds, as opposed to ongoing account activity, in or which hereafter are transmitted into PayPal accounts linked to, associated with, or that transmit funds into Defendants’ identified bank accounts,⁶ including but not limited to:

⁶ The full account numbers identified herein have been redacted to avoid disclosure of private financial information, in compliance with Fed. R. Civ. P. 5.2(a)(4); however, the full account

Bank Accounts
Industrial and Commercial Bank of China Account Number: *****1526 Account Name: Zhiyan Zhong
Bank of China Account Number: *****5755 Account Name: Chen MuLan
Industrial and Commercial Bank of China Account Number: **** *4 545 Account Name: Liu Anming
China Merchants Bank Account Number: *****2745 Account Name: Zeng Yun
Bank of China Account Number: ****-****-****-****5-516 Account Name: Jin Qun Gao
Bank of China Account Number: *****7329 Account Name: Zuoxi Yu
Industrial and Commercial Bank of China Account Number: **** *9 304 Account Name: Jinju Huang
Industrial and Commercial Bank of China Account Number: *****8268 Account Name: He Ruiyu

and any other related accounts of the same customers;

(12) PayPal shall also, to the extent not already done, immediately divert to a holding account for the trust of the Court all funds in all PayPal accounts related to the PayPal account recipients listed in Paragraph 10, *supra*, and any other related accounts of the same customer(s), and all PayPal accounts linked to, associated with, or that transmit funds into, including but not limited to, Defendants' identified bank accounts listed in Paragraph 11, *supra*, and any other related accounts of the same customers, as well as any other accounts which transfer funds into

numbers are identified on Plaintiff's Notice of Filing Reference List, filed under seal, which shall be disclosed to PayPal to effectuate the relief ordered herein.

the same financial institution account(s) as any of the other PayPal accounts subject to this Order;

(13) PayPal shall further, to the extent not already done, within five business days of receiving this Order, provide Plaintiff's counsel with all data which details (i) an accounting of the total funds restrained and identifies the PayPal account(s) which the restrained funds are related to, and (ii) the account transactions related to all funds transmitted into the PayPal account(s) which have been restrained. Such restraining of the funds and the disclosure of the related financial institution account information shall be made without notice to the account owners until after those accounts are restrained. No funds restrained by this Order shall be transferred or surrendered by PayPal for any purpose (other than pursuant to a chargeback made pursuant to PayPal's security interest in the funds) without the express authorization of this Court;

(14) This Order shall apply to the Subject Domain Names and Seller IDs, associated domain names and ecommerce stores and auctions, and any other websites, domain names, seller identification names, ecommerce stores and auctions, or PayPal accounts which are being used by Defendants for the purpose of counterfeiting the Chanel Marks at issue in this action or unfairly competing with Plaintiff;

(15) Pursuant to 15 U.S.C. § 1116(d)(5)(D), Plaintiff shall maintain its previously posted bond in the amount of Ten Thousand Dollars and Zero Cents (\$10,000.00), as payment of damages to which Defendants may be entitled for a wrongful injunction or restraint, during the pendency of this action, or until further Order of the Court. In the Court's discretion, the bond may be subject to increase should an application be made in the interest of justice;

(16) PayPal or any Defendant or PayPal account holder may petition the Court to modify the asset freeze set out in this Order; and

(17) This Order shall remain in effect during the pendency of this action, or until further Order of this Court.

DONE AND ORDERED in Chambers at Fort Pierce, Florida, this th 16 day of December 2014, at 9:08 a.m.


ROBIN L. ROSENBERG
UNITED STATES DISTRICT JUDGE

Copies provided to:

Counsel of Record

SCHEDULE "A"
DEFENDANTS BY NUMBER AND SUBJECT DOMAIN NAMES AND SELLER IDS

Defendant Number	Defendant / Domain Name / Seller ID
1	bestbuyhandbag.com
2	coffeealaska.com
2	bowdenfencing.com
3	fast2014.org
4	ireplicasall.net
4	watchjuste.com
4	watchujust.co
5	newbags2014.com
5	selectbag.net
6	onlinebrandsshop.com
7	paulseller.com
8	sohotcase.com
9	tbaft.com
10	topshoesstoreusa.com
11	666111xqj
12	abdmarshop
13	aixinwuyu
13	shizhenxiong68
14	ajiedali2158
15	apinan
16	baobaokaixin999
17	beautifulfashion2010
18	buyorbuyer
19	c2c2020
20	caishendaowojia518
21	caylajewel
22	changxin888888
23	charmstar888
24	dajiang8588
25	eachw
26	everything589
27	fashionjuan
28	gladysfashion
29	glasses21000
30	greatwallmart

31	haoluck77
32	happyal89
33	happybuy125
34	happyec2013
35	hellensk
36	hongyunguangjin118
37	jiahaibo123
38	jibukeshistore
39	jinshan998
40	kingseller8486
41	ladyshop6168
42	love0126
43	lovenow5184
44	michaelwang
45	ourstationery
46	shengmumaliya22222
47	smoothsailing666
48	smsd14717
49	super85117
50	tomstore888
51	visionary51198
52	webest
53	wiwojia891qw
54	wodson37372
55	woniul604
56	yangcheng5201314
57	yintng8596shoes
58	youxinyi168
59	zhou201288
60	zxcvbn869
61	fashionworld36

SCHEDULE "B"
DEFENDANTS' ASSOCIATED E-MAIL ADDRESSES

Defendant Number	Defendant / Domain Name / Seller ID	Associated E-Mail Addresses
1	bestbuyhandbag.com	909858463@qq.com bestbuyhandbag@gmail.com
2	coffeealaska.com	xiaomei_514862703@qq.com lovebrialdresses@gmail.com
2	bowdenfencing.com	xiaomei_514862703@qq.com lovebrialdresses@gmail.com
3	fast2014.org	nivia.laa@hotmail.com chauderdana@live.com plusacs@hotmail.com
4	ireplicasall.net	hesongzhang73@yeah.net watchesvisa@gmail.com replicasall@yeah.net
4	watchjuste.com	watchesimple@gmail.com
4	watchujust.co	watchesmvp@yeah.net
5	newbags2014.com	josephine2212@163.com niceday8810@hotmail.com selecthandbags@gmail.com sales@selectbag.net
5	selectbag.net	websoso@126.com
6	onlinebrandsshop.com	76319011@qq.com onlinebrandsshop@gmail.com
7	paulseller.com	paulsellercom@zh9.cn Popularbag@live.com
8	sohotcase.com	terrycover@outlook.com sohotcase@outlook.com
9	tbaft.com	saemsu@outlook.com shoppingver@gmail.com
10	topshoesstoreusa.com	rachel000larger@163.com service@topshoesstoreusa.com
11	666111xqj	wz201468@163.com meng2014621@163.com qwer201476@163.com quanshiai721@163.com
12	abdmарshop	abdmарfashion@gmail.com
13	aixinwuyu	pinganfacai8888@163.com sufengliu996@gmail.com
13	shizhenxiong68	sufengliu996@gmail.com qingshanfacai86@hotmail.com
14	ajiedali2158	zhaoxiao6138wangxa@163.com
15	apinan	phitphibul@outlook.com

16	baobaokaixin999	zhaoxiantong613@163.com jinzhou0607@126.com qingkongwanli0620@163.com ligang2014705@126.com lilanchun0710@126.com lina20140726@126.com
17	beautifulfashion2010	yuanyang8hao@163.com
18	buyorbuyer	buyera0124@126.com
19	c2c2020	honghonghuohuo2008@126.com
20	caishendaowojia518	parisfashionwu@126.com
21	caylajewel	natalianugroho@hotmail.com
22	changxin888888	lmno9000@163.com
23	charmstar888	dahai898@hotmail.com shubao6231@hotmail.com gangbi123@hotmail.com
24	dajiang8588	xiaomin5868@126.com
25	eachw	fenvttamm@yahoo.cn
26	everything589	wriyuuy@163.com qfsqmm@163.com
27	fashionjuan	moonghy756@outlook.com
28	gladysfashion	caviearez@gmail.com
29	glasses21000	graysome512@outlook.com takeilk@outlook.com
30	greatwallmart	mada.madalina@outlook.com qwqwqw77@outlook.com
31	haoluck77	changg98@126.com gand76@126.com yder96@126.com
32	happya189	youyou1992a@yeah.net menghuia1988@yeah.net
33	happybuy125	sellerguoda@126.com worldlin1258@126.com
34	happyec2013	ysg888usd@163.com
35	hellensk	Pierrerolland@163.com
36	hongyunguangjin118	feixiang5673@163.com feixiang56788@163.com
37	jiahaibo123	qianshuixiaoyu6591@126.com
38	jibukeshistore	zhonghuarenv999@hotmail.com
39	jinshan998	chongxinkaishi608@163.com
40	kingseller8486	sf.englishai@outlook.com
41	ladyshop6168	sstoe8@yeah.net ddlucks@yeah.net ppone100@163.com ppone20@163.com

42	love0126	liming20140422@gmail.com
		hangzaishouqian12@163.com
43	lovenow5184	hangzaishouqian14@163.com hangzaishouqian20@163.com
44	michaelwang	tleisi1019@126.com madiqi1019@126.com
45	ourstationery	aukung_1@hotmail.com
46	shengmumaliya22222	mkmkkmkfhfhfh6849@163.com
47	smoothsailing666	tianjin5139@126.com mafang8795@126.com
48	smsd14717	jsmh219@163.com
49	super85117	mali1097@163.com
50	tomstore888	hangzaishouqian28@163.com
51	visionary51198	fantasize043@126.com
52	webest	kjehfrui@hotmail.com
53	wiwojia891qw	zto9021zto@126.com
		shyi20435@126.com cibing21021@163.com ttmon78721@163.com kookg867@126.com tanoo4211@163.com cha2299tt@163.com
54	wodson37372	
55	woniu1604	dongtian_2014@163.com
56	yangcheng5201314	murenqing@hotmail.com
57	yintng8596shoes	xxxiao613@126.com xxxiao701@126.com
58	youxinyi168	tianding2014@126.com edcvfr2014@126.com
59	zhou201288	rertyu6tyt6@outlook.com
		qiushewozui_99@163.com chongsheng_985@126.com haliluya_zanmei@163.com
60	zxcvbn869	
61	fashionworld36	yangjian19920203@163.com

SCHEDULE "C"
DEFENDANTS' RESPECTIVE PAYPAL AND/OR BANK ACCOUNTS

1) Eric Rosaler's Investigation – Internet Websites

Subject Domain Name	Payment Method	Account
bestbuyhandbag.com	Bank Transfer	Industrial and Commercial Bank of China Account Number: *****1526 Account Name: Zhiyan Zhong
bowdenfencing.com coffealaska.com	Bank Transfer	Bank of China Account Number: *****5755 Account Name: Chen MuLan
fast2014.org	PayPal	chauderdana@live.com
ireplicasall.net watchjuste.com watchujust.co ⁷	Bank Transfer	Industrial and Commercial Bank of China Account Number: **** * 4 545 Account Name: Liu Anming
newbags2014.com selectbag.net ⁸	Bank Transfer	China Merchants Bank Account Number: *****2745 Account Name: Zeng Yun
onlinebrandsshop.com	Bank Transfer	Bank of China Account Number: ****-****-****-****5-516 Account Name: Jin Qun Gao
paulseller.com	Bank Transfer	Bank of China Account Number: *****7329 Account Name: Zuoxi Yu
sohotcase.com	PayPal	terrycover@outlook.com
tbaft.com	Bank Transfer	Industrial and Commercial Bank of China Account Number: **** * 9 304 Account Name: Jinju Huang
topshoesstoreusa.com	Bank Transfer	Industrial and Commercial Bank of China Account Number: *****8268 Account Name: He Ruiyu

⁷ Upon accessing the Internet website operating under the domain name, watchujust.co, Rosaler was automatically redirected to the Internet website operating under the domain name, ireplicasall.net. See Rosaler Decl., ECF No. [5-14] at ¶ 5, n.3.

⁸ Upon accessing the Internet website operating under the domain name, selectbag.net, Rosaler was automatically redirected to the Internet website operating under the domain name, newbags2014.com. See Rosaler Decl., ECF No. [5-14] at ¶ 5, n.4.

2) Eric Rosaler's Investigation – ecommerce stores and auctions

Seller IDs	PayPal Accounts
666111xqj	wz201468@163.com meng2014621@163.com qwer201476@163.com quanshai721@163.com
abdmarsshop	abdmarsfashion@gmail.com
aixinwuyu	pinganfacai8888@163.com sufengliu996@gmail.com
shizhenxiong68	sufengliu996@gmail.com qingshanfacai86@hotmail.com
ajiedali2158	zhaoxiao6138wangxa@163.com
apinan	phitphibul@outlook.com
baobaokaixin999	zhaoxiantong613@163.com jinzhou0607@126.com qingkongwanli0620@163.com ligang2014705@126.com lilanchun0710@126.com lina20140726@126.com
beautifulfashion2010	yuanyang8hao@163.com
buyorbuyer	buyera0124@126.com
c2c2020	honghonghuohuo2008@126.com
caishendaowojia518	parisfashionwu@126.com
changxin888888	lmno9000@163.com
charmstar888	dahai898@hotmail.com shubao6231@hotmail.com gangbi123@hotmail.com
dajiang8588	xiaomin5868@126.com
eachw	fenvttamm@yahoo.cn
everything589	wriyuuy@163.com qfsqmm@163.com
fashionjuan	moonghy756@outlook.com
gladysfashion	caviearez@gmail.com
glasses21000	takeilk@outlook.com
greatwallmart	mada.madalina@outlook.com qwqwqw77@outlook.com
haoluck77	changg98@126.com gand76@126.com yder96@126.com
happya189	youyou1992a@yeah.net menghuia1988@yeah.net

happybuy125	sellerguoda@126.com worldlin1258@126.com
happyec2013	ysg888usd@163.com
hellensk	Pierrerolland@163.com
hongyunguangjin118	feixiang5673@163.com feixiang56788@163.com
jiahaibo123	qianshuixiaoyu6591@126.com
jibukeshistore	zhonghuarenv999@hotmail.com
jinshan998	chongxinkaishi608@163.com
kingseller8486	sf.englishai@outlook.com
ladyshop6168	ddlucks@yeah.net ppone100@163.com ppone20@163.com
love0126	liming20140422@gmail.com
lovenow5184	hangzaishouqian12@163.com hangzaishouqian14@163.com hangzaishouqian20@163.com
michaelwang	madiqi1019@126.com
ourstationery	aukung_1@hotmail.com
shengmumaliya22222	mkmkfkfhfhfh6849@163.com
smoothsailing666	tianjin5139@126.com mafang8795@126.com
super85117	mali1097@163.com
tomstore888	hangzaishouqian28@163.com
visionary51198	fantasize043@126.com
webest	kjehfrui@hotmail.com
wiwojia891qw	zto9021zto@126.com
wodson37372	shyi20435@126.com cibing21021@163.com ttmon78721@163.com kookg867@126.com tanoo4211@163.com cha2299tt@163.com
woniul604	dongtian_2014@163.com
yangcheng5201314	murenqing@hotmail.com
yintng8596shoes	xxxiao613@126.com xxxiao701@126.com
youxinyi168	tianding2014@126.com edcvfr2014@126.com
zhou201288	rertyu6tyt6@outlook.com
zxcvbn869	qiushewozui_99@163.com chongsheng_985@126.com haliluya_zanmei@163.com
fashionworld36	yangjian19920203@163.com

3) Stephen M. Gaffigan's Investigation – ecommerce store

Seller ID	PayPal Account
ladyshop616	sstoe8@yeah.net