UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

Case No. 20-cv-62455-BLOOM/Valle

MICHAEL KORS, L.L.C., and GIANNI VERSACE S.R.L.,

Plaintiffs,

VS.

THE INDIVIDUALS, PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE "A,"

Defendants.

ORDER GRANTING PLAINTIFFS' MOTION FOR ENTRY OF PRELIMINARY INJUNCTION

THIS CAUSE is before the Court upon Plaintiffs' Motion for Preliminary Injunction ("Motion"), ECF No. [7]. The Court has carefully considered the Motion, the record in this case, and the applicable law, and is otherwise fully advised.

By the instant Motion, Plaintiffs, Michael Kors, L.L.C. and Gianni Versace, S.r.l. (collectively "Plaintiffs"), move for entry of a preliminary injunction against Defendants, ¹ for alleged violations of the Lanham Act, 15 U.S.C. §§ 1114 and 1125(a). The Court held a hearing by video conference on December 18, 2020, which was attended by counsel for Plaintiffs only. During the hearing, Plaintiffs directed the Court to evidence supporting the Motion for Preliminary Injunction. Prior to the hearing, Plaintiffs notified the Court that it had received an email inquiry from Defendant Numbers 172, 192, 251, 293, and 304² to which Plaintiffs

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

² Plaintiffs' counsel was also contacted via email by attorneys based in the United States and foreign-

provided notice of the hearing and Defendants' rights to file answers in response to Plaintiffs' claims. Other email communications were received but were in the context of attempting to resolve the case and were not objections to the issuance of a preliminary injunction. None of the Defendants formally responded to the Motion, nor have they made any appearance or filing in this case, other than the above mentioned emails, either individually or through counsel. Because Plaintiffs have satisfied the requirements for the issuance of a preliminary injunction, the Court grants the Motion.

I. FACTUAL BACKGROUND³

Plaintiff, Michael Kors, L.L.C., is the owner of the following trademarks which are valid and registered on the Principal Register of the United States Patent and Trademark Office (the "Michael Kors Marks"):

Trademark	Registration Number	Registration Date	Class(es) / Relevant Goods
MICHAEL KORS	2,049,326	April 1, 1997	IC 025 – clothing for use by women; namely, anoraks; [aprons;] ascots; [babushkas;] bandanas; [bathrobes;] belts; blazers; blousons; bodysuits; boleros; boots;[boxer shorts; brassieres; briefs;] caftans; camisoles; capes; caps; cardigans; chemises; clogs; fur coats; suit coats;[corselets;] culottes; earmuffs; [galoshes; garter belts; girdles;] gloves; [nightgowns;] halter tops; hats; headbands; [hosiery;] jeans; jogging suits; jumpers; jumpsuits; kerchiefs; kimonos; leggings; [leotards;]loungewear; mittens; moccasins; mufflers; neckerchiefs; neckties;

based counsel regarding a possible resolution of the matter on behalf of Defendant Numbers 34, 49, 51, 53, 55, 56, 57, 58, 61, 62, 64, 65, 114, 117, 135, 188, 271, 275, 279, and 323, ECF No. [20], at n.1.

³ The factual background is taken from Plaintiffs' Amended Complaint, ECF No. [17], Plaintiffs' Motion, ECF No. [7], and supporting evidentiary submissions. Plaintiffs filed declarations and exhibits annexed thereto in support of their Motion. The declarations are available in the docket at the following entries: Declaration of Chloe Long, ECF No. [7-1], Declaration of Christine Ann Daley, ECF No. [7-2], and Declaration of Kathleen Burns, ECF No. [7-3].

Trademark	Registration Number	Registration Date	Class(es) / Relevant Goods
			neckwear; [negligees; nightshirts; overalls; overshoes pajamas; panties;] pantsuits; [pantyhose;] parkas; pedal pushers; [peignors; pinafores; playsuits; pocket squares;] ponchos; pullovers; raincoats; sandals; scarves; shawls; shorts; undershirts; athletic shoes; gym shorts; sweat shorts; [ski suits;] slacks; [snowsuits;] socks; sport coats; sport shirts; [stockings;] stoles; suits; [suspenders;] sweat pants; sweat shirts; T-shirts; trousers; [tuxedos; underpants;] vests; vested suits; and warm-up suits; and, clothing for use by men; namely, anoraks; [ascots; bandanas; bathrobes;] belts; blazers; [boots; boxer shorts; briefs; capes; caps;] cardigans; [clogs;] fur coats; suit coats; [earmuffs; galoshes;] gloves; hats; [headbands; hosiery; jeans; jogging suits; kerchiefs; leotards; loungewear; mittens; moccasins; mufflers; neckerchiefs;] neckties; neckwear; [nightshirts; overalls; overshoes; pajamas; pantsuits;] parkas; [pedal pushers; playsuits;] pocket squares; [ponchos;] pullovers; raincoats; [sandals;] scarves; [shawls;] shorts; undershirts; [athletic shoes; gym shorts; sweat shorts; ski suits;] slacks; [snowsuits; socks;] sport coats; sport shirts; suits; [suspenders;] sweat pants; sweat shirts; T-shirts; trousers; tuxedos; vests; vested suits; [and warm-up suits].
MICHAEL KORS	2,520,757	December 18, 2001	IC 018 – handbags, billfolds, credit card cases, key cases, and tote bags.

Trademark	Registration Number	Registration Date	Class(es) / Relevant Goods
MICHAEL MICHAEL KORS	3,080,631	April 11, 2006	IC 018 – bags, namely, tote bags; handbags; purses; wallets. IC 025 – Men's and women's clothing, namely, dresses, skirts, blouses, pants, jackets, blazers, coats, raincoats, capes, ponchos, scarves, hats, gloves, sweaters, belts, bathing suits, halter tops, jeans, warm up suits, sweatshirts, sweatpants, leggings, shorts, slacks, sport coats, sport shirts, suits, t-shirts, vests, ties; undergarments for women, namely, camisoles; footwear and headwear; belts.
MICHAEL KORS	3,160,981	October 17, 2006	IC 014 – watches.
MK MICHAEL KORS	3,438,412	May 27, 2008	IC 009 – eyeglass frames, eyeglasses, sunglasses, eye shades. IC 018 – handbags. IC 025 – Men's and women's clothing, namely, dresses, skirts, blouses, pants, jackets, blazers, coats, sweaters, belts, jeans, sweatshirts, shorts, slacks, sport coats, T-shirts; footwear and headwear; belts.
MK MICHAEL KORS	3,535,310	November 18, 2008	IC 014 – watches.
MICHAEL KORS	4,052,748	November 8, 2011	IC 014 – jewelry.

See Declaration of Chloe Long, ECF No. [7-1], at 4-5; ECF No. [17-1] (containing Certificates of Registrations for the Michael Kors Marks at issue). The Michael Kors Marks are used in connection with the manufacture and distribution of quality goods in the categories identified above. *See* Declaration of Chloe Long, ECF No. [7-1], at 4-5.

Plaintiff, Gianni Versace, S.r.l., is the owner of the following trademarks which are valid and registered on the Principal Register of the United States Patent and Trademark Office (the "Versace Marks"):

Trademark	Registration Number	Registration Date	Class(es) / Relevant Goods
	1,875,093	Jan. 24, 1995	IC 009 – spectacles and spectacles frames. IC 014 – goods of precious metals or coated therewith, namely necklaces, earrings, bracelets, broches, rings, necktie pins, badges of precious metal, medallions, belt buckles of precious metal (for clothing), jewelry, precious gemstones, watches, clocks, chronometers.
VERSACE	2,121,984	Dec. 16, 1997	IC 018 – leather or imitations of leather, namely, animal skins and hides, handbags, wallets, luggage, attache cases, tote bags, briefcases, all purpose sport bags, travelling trunks and carry-on bags, shoulder bags, garment bags for travelling, keycases, umbrellas. IC 025 – clothing for men, women and children, namely belts, coats, raincoats, waistcoats, blouses and pullovers, jackets, trousers, skirts, dresses, suits, shirts and chemises, T-shirts, sweaters, underwear, socks and stockings, gloves, ties, scarves, hats and caps, boots, shoes and slippers.
VERSACE	2,440,541	April 3, 2001	IC 020 – chairs, cupboards; cushions; desks; divans; figures of bone, ivory, plaster, plastic, wax and wood; domestic fireplace bellow; door handles for furniture; non-metal key chains; office furniture; pillows; parts and fittings for all the aforesaid goods. IC 024: bath linen, bath mats, bed linen; blankets; unfitted fabric, furniture covers; handkerchiefs; kitchen towels.

Trademark	Registration Number	Registration Date	Class(es) / Relevant Goods
Trademark	_	_	Class(es) / Relevant Goods IC 009 – optical instruments, apparatus and equipments, namely eyeglasses; reading glasses, and optical glasses; sunglasses; spectacles; spectacles frames; monocles; lorgnettes. IC 014 – articles made of precious metals and alloys of precious metals with or without precious stones, namely rings, necklaces, bracelets, brooches, earrings, tie clips, cufflinks, diamonds, jewelry cases made of precious metal, watches, clocks, chronometers, watch cases, costume jewelry. IC 018 – leather and imitation of leather sold in bulk, handbags, wallets, luggage, attache cases, tote bags, briefcases, sport bags,
	2,980,455 Au	Aug. 2, 2005	traveling trunks, carry-on bags, shoulder bags, garment bags for traveling, key cases, umbrellas, parasols, walking sticks, whips, harnesses, saddlery; leather key chains. IC 020: Furniture; mirrors, namely looking glasses; picture frames; chairs; cupboards; cushions; desks; divans; plastic and wood doorknobs; figures of bone, ivory, plaster, plastic, wax and wood; plastic and wood furniture handles for doors, plastic key chains; magazine racks; office furniture; pillows; fitted furniture covers.
			IC 024 – fabric for textile use, fabric of imitation animal skins, fabric for boots and shoes, bath linen; bed linen; blankets; curtains; unfitted furniture covers; handkerchiefs; kitchen towels; textile wall hangings.
			IC 025 – clothing for men, women and children, namely belts, coats, raincoats, waistcoats, blouses and pullovers, jackets, trousers, skirts, dresses, suits, shirts and chemises, T-shirts, sweaters, underwear, socks and stockings, gloves, ties, scarves, hats and caps, boots, shoes and slippers.

Trademark	Registration Number	Registration Date	Class(es) / Relevant Goods
12555555555555555555555555555555555555	3,194,501	Jan. 2, 2007	IC 009 – glasses, sunglasses, spectacles, spectacle frames, and cases. IC 014 – articles made of precious metals and alloys of precious metals, with or without precious stones, namely, rings, necklaces, bracelets, earrings, tie clips, cuff-links, watches, costume jewellery. IC 024 – fabric for textile use, fabric for boots and shoes, bath linen, bed linen, bed blankets, unfitted fabric furniture covers. IC 025 – clothing for men, women and children, namely belts, coats, raincoats, waistcoats, blouses, and pullovers, jackets, trousers, skirts, dresses, suits, shirts and chemises, t-shirts, sweaters, underwear, socks and stockings, gloves, ties, scarves, hats and caps, boots, shoes and slippers.
	3,199,127	Jan. 16, 2007	IC 009 – optical instruments, apparatus and equipment, namely, glasses, sunglasses, spectacles, spectacle frames, accessories in the nature of eyeglass chains, and parts, fittings, components and cases for all the aforesaid goods. IC 014 – articles made of precious metals and alloys of precious metals, with or without precious stones, namely, rings, necklaces, bracelets, brooches, earrings, tie clips, cufflinks, watches, watch cases, costume jewellery, parts and fittings for all the aforesaid goods. IC 018 – leather and imitation leather goods, namely, handbags, wallets, luggage, tote bags, briefcases, sport bags, carry-on bags, shoulder bags, garment bags for traveling, key cases. IC 024 – fabric for textile use, fabric of imitation animal skins, fabric for boots and shoes, bath linen, bed linen; bed blankets; and

Trademark	Registration Number	Registration Date	Class(es) / Relevant Goods	
			kitchen towels.	
			IC 009 – glasses, sunglasses, spectacles.	
			IC 018 – leather and imitation leather goods, namely, handbags, wallets, luggage, tote bags, key cases.	
	3,453,992 June 24, 2008	IC 020 – furniture; mirrors, namely, looking glasses; cushions; desks; divans; office furniture; pillows; parts and fittings for the aforesaid furniture goods, namely, fitted furniture covers not of paper.		
			IC 024 – bath linen; bed linen; bed blankets.	
			child blow dres unde	IC 025 – Clothing for men, women and children, namely, belts, coats, waistcoats, blouses and pullovers, jackets, trousers, skirts, dresses, shirts and chemises, T-shirts, underwear, socks and stockings, gloves, ties, scarves, hats and caps, shoes and slippers.
			IC 026 – clothing buttons.	
VERSACE	3,976,544	3,976,544	IC 009 – glasses, namely, eyeglasses; sunglasses; spectacles; spectacle frames; spectacle cases, parts and accessories for the aforementioned products, namely, eyeglasses, lenses and optical frames.	
VERSACE	4,398,385	Sep. 10, 2013	IC 014 – articles made of precious metals and alloys of precious metals with or without precious stones, namely, rings, necklaces, bracelets, brooches, earrings, tie clips, cufflinks, diamonds, jewel cases, watches, clocks, chronometers, watch cases, costume jewelry, parts and fittings for all the aforesaid goods.	
			IC 027 – carpets, bath mats; rugs, mats and matting, and other materials for covering existing floors; non-textile wall hangings.	

Trademark	Registration Number	Registration Date	Class(es) / Relevant Goods
	4,476,530	Feb. 4, 2014	IC 025 – clothing for men, women and children, namely, belts, coats, raincoats, waistcoats, blouses and pullovers, jackets, trousers, skirts, dresses, suits, shirts and chemises, T-shirts, sweaters, underwear, socks and stockings, gloves, ties, scarves, hats and caps, boots, shoes and slippers. IC 026 – lace and embroidery, ribbons and braid, buttons, hooks and eyes, pins namely, hair pins, curling pins, safety pins and needles, buckles, namely, belt buckles and hair buckles.
	5,253,199	Aug. 01, 2017	IC 014 – jewellery, precious stones; horological and chronometric instruments; jewelry, namely, rings; cuff links; jewelry, namely, bracelets; watch bands; watch cases being parts of watches; clock cases being parts of clocks; watch chains; jewelry chains; pendants; jewelry, namely, necklaces; chronographs as watches; timepieces; stopwatches; chronoscopes; diamonds; tie pins; figurines, namely, statuettes of precious metal; gold thread jewelry; jewelry, namely, wire in the nature of threads of precious metal; jewelry, namely, silver thread; jewellery; jewelry, namely, cloisonné jewellery; badges of precious metal; clock- and watchmaking items, namely, clock hands; alloys of precious metal; ingots of precious metals; movements for clocks and watches; medals; jewelry, namely, lockets; earrings; jewellery of yellow amber; ivory jewelry; jewelry, namely, ornaments; ornaments of jet; shoe ornaments of precious metal; hat ornaments of precious metal; pendulum clocks; atomic clocks; wristwatches; pocket watches; master clocks; electric clocks and watches; jewellery stones; key rings in the nature of trinkets and fobs of precious metal; dials for clock-and-watch-making; boxes of precious metal; cases for clock- and watchmaking, namely, cases being parts of watches and clocks; jewelry cases in the nature of caskets or boxes; presentation

Trademark	Registration Number	Registration Date	Class(es) / Relevant Goods
			cases for watches being parts of watches; pins being jewelry; ornamental pins; jewelry, namely, brooches; statuettes of precious metal; costume jewelry, namely, paste jewelry; time instruments, namely, watches, clocks; alarm clocks; watch crystals.
	5,173,618		IC 014 – jewelry, precious stones; horological and chronometric instruments; rings being jewelry; cuff links; bracelets being jewelry; watch bands; watch cases; clock cases; watch chains; jewelry chains; pendants; necklaces being jewelry; chronographs for use as timepieces; timepieces; stopwatches; chronoscopes; diamonds; tie pins; figurines in the nature of statuettes of precious metal; gold thread jewelry; wire of precious metal, namely, precious metal jewelry chains; silver thread jewelry; cloisonné jewelry; badges of precious metal; clock hands for clock- and watchmaking; alloys of precious metal; ingots of precious metals; movements for clocks and watches; medals; lockets being jewelry; earrings; jewelry of yellow amber, ivory jewelry; jewelry ornaments; ornaments of jet; shoe ornaments of precious metal; pendulum clocks; atomic clocks; wristwatches; pocket watches; master clocks; electric clocks and watches; jewelry stones; trinkets or fobs, namely, key rings of precious metal; dials for clock and watch making; boxes of precious metal; cases for clock- and watchmaking; jewelry cases, namely, jewelry caskets and boxes; presentation cases for watches, namely, cases adapted for holding watches; pins being jewelry; ornamental pins; jewelry brooches; statuettes of precious metal; paste jewelry being costume jewelry; time instruments, namely, watches, clocks; alarm clocks; watch crystals.

See Declaration of Chloe Long, ECF No. [7-1], at 10-11; ECF No. [17-2] (containing Certificates of Registration for the Versace Marks at issue). The Versace Marks are used in connection with the manufacture and distribution of quality goods in the category identified above. See Declaration of Chloe Long, ECF No. [7-1], at 10-11.

Defendants, by operating Internet based e-commerce stores and a commercial Internet website under Defendants' respective seller identification names and domain name identified on Schedule "A" hereto (the "Seller IDs and Subject Domain Name"), have advertised, promoted, offered for sale, or sold goods bearing and/or using what Plaintiffs have determined to be counterfeits, infringements, reproductions or colorable imitations of the Michael Kors Marks and/or the Versace Marks (collectively "Plaintiffs' Marks"). *See* Declaration of Chloe Long, ECF No. [7-1], at 16-20; Declaration of Christine Ann Daley, ECF No. [7-2], at 2; Declaration of Kathleen Burns, ECF No. [7-3], at 4.

Although each Defendant may not copy and infringe each of Plaintiffs' Marks for each category of goods protected, Plaintiffs have submitted sufficient evidence showing each Defendant has infringed, at least, one or more of Plaintiffs' Marks. *See* Declaration of Chloe Long, ECF No. [7-1], at 16-20. Defendants are not now, nor have they ever been, authorized or licensed to use, reproduce, or make counterfeits, reproductions, and/or colorable imitations of Plaintiffs' Marks. *See* Declaration of Chloe Long, ECF No. [7-1], at 16, 19-20.

Counsel for Plaintiffs retained Invisible Inc ("Invisible"), a licensed private investigative firm, to investigate the promotion and sale of counterfeit and infringing versions of Plaintiffs' branded products by Defendants and to obtain the available payment account data for receipt of funds paid to Defendants for the sale of counterfeit versions of Plaintiffs' branded products. *See* Declaration of Chloe Long, ECF No. [7-1], at 17; Declaration of Christine Ann Daley, ECF No.

[7-2], at 2; Declaration of Kathleen Burns, ECF No. [7-3], at 3. Invisible accessed the Internet based e-commerce stores and Internet website operating under the Seller IDs and Subject Domain Name and placed orders from each Defendant for the purchase of various products, all bearing⁴ counterfeits of, at least, one of Plaintiffs' trademarks at issue in this action, and requested each product to be shipped to Invisible's address in the Southern District of Florida. *See* Declaration of Kathleen Burns, ECF No. [7-3], at 4. Each order was processed entirely online, and following the submission of the orders, Invisible received information for finalizing payment⁵ for the various products ordered via Defendants' respective payment accounts⁶ and/or payee,⁷ which are identified on Schedule "A" hereto.⁸ (*See id.*) At the conclusion of the process,

⁴ Certain Defendants blurred-out and/or physically altered the images of Plaintiffs' Marks on the product being offered for sale via its e-commerce store. The product Invisible received from this Defendant bears Plaintiffs' Marks in their entirety. (*See* Declaration of Kathleen Burns, ECF No. [7-3], at 4, n.1.)

⁵ Invisible was instructed not to transmit the funds to finalize the sale for the orders from some of the Defendants so as to avoid adding additional funds to Defendants' coffers. (*See* Declaration of Christine Ann Daley, ECF No. [7-2], at 7 2, n.1; Declaration of Kathleen Burns, ECF No. [7-3], at 4, n.2.)

⁶ Defendant Number 38 operates via a website and Defendant Numbers 39-48 operate via the non-party Internet marketplace platform eBay.com, and use money transfer and retention services with PayPal, Inc. ("PayPal"). Moreover, Defendant Numbers 5 and 8-9, who operate via AliExpress.com, use money transfer and retention services with PayPal as an additional payment method. (*See* Declaration of Kathleen Burns, ECF No. [7-3], at 4 n.3; Declaration of Christine Ann Daley, ECF No. [7-2], at 7.)

⁷ Defendant Numbers 1-31 operate via the non-party Internet marketplace platform, AliExpress.com, and have their payments processed on their behalf using Alipay. Defendant Numbers 32-37 operate via the non-party e-commerce marketplace platform, Amazon.com, and use payment processing and retention services with Amazon Payments, Inc. Defendant Numbers 49-65 operate via the non-party e-commerce marketplace platform Joom.com, which is operated by SIA Joom. The payee for the orders placed on Joom.com identifies "Joom USA Inc," which is the aggregate PayPal account for purchases made via Joom.com. Defendant Numbers 66-77 operate via the non-party e-commerce marketplace platform, Wish.com ("Wish"), which is operated by ContextLogic Inc. ("ContextLogic"). The payee for the orders placed on Wish.com identifies "PayPal *Wish," which is the aggregate PayPal account for purchases made via Wish.com. Lastly, Defendant Numbers 78-340 operate via the non-party e-commerce marketplace platform, DHgate.com, which utilizes DHpay.com as a third-party payment service. such, Defendants' payment information is not publicly disclosed. However, because these financial entities accept and/or process payments on behalf of the individual merchants operating on their respective platforms, the financial entities can tie a particular Seller ID, merchant identification number, and/or store number to a reported transaction and identify the merchant's funds held in sub-accounts within their respective account. (See Declaration of Kathleen Burns, ECF No. [7-3], at 4 n.3; Declaration

the detailed web page captures and images of the various Plaintiffs' branded products ordered via Defendants' Seller IDs and Subject Domain Name, together with photographs of some of the products received, were sent to Plaintiffs' representative, Chloe Long, for inspection. *See* Declaration of Chloe Long, ECF No. [7-1], at 18; Declaration of Christine Ann Daley, ECF No. [7-2], at 2.

Plaintiffs' representative reviewed and visually inspected the detailed web page captures and photographs reflecting Plaintiffs' branded products Invisible ordered from Defendants through Internet based e-commerce stores and the Internet website operating under their respective Sellers IDs and Subject Domain Name, and determined the products were not genuine versions of Plaintiffs' goods. *See* Declaration of Chloe Long, ECF No. [7-1], at 19-20.

On December 2, 2020, Plaintiffs filed their Complaint, ECF No. [1], and on December 16, 2020, their Amended Complaint, ECF No. [17], against Defendants for trademark counterfeiting and infringement, false designation of origin, common law unfair competition, and common law trademark infringement. On December 3, 2020, Plaintiffs filed their *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets, ECF No. [7]. On December 4, 2020, this Court entered a sealed Temporary Restraining Order, ECF No. [11], and temporarily restrained Defendants from infringing Plaintiffs' Marks at issue. The Temporary Restraining Order also directed Alibaba.com Hong Kong Limited, which operates the AliExpress.com platform ("AliExpress"), Zhejiang Ant Small and Micro Financial Services Group Co., Ltd. ("Ant Financial Services"), AliPay (China) Internet Technology Co. Ltd. and Alipay.com Co., Ltd. (collectively, "Alipay"),

of Christine Ann Daley, ECF No. [7-2], at 5-6, 8-10.)

⁸ Defendant Number 38 also provided contact e-mail addresses in connection with their Subject Domain Name, which is included on Schedule "A" hereto. (*See* Declaration of Christine Ann Daley, ECF No. [7-2], at 3.)

Amazon Payments, Inc. ("Amazon"), PayPal, Inc. ("PayPal"), SIA Joom, which operates the Joom.com platform ("Joom"), ContextLogic, Inc., which operates the Wish.com website ("ContextLogic"), and Dunhuang Group which operates the DHgate.com and DHPay.com platforms, to identify and restrain funds in payment accounts associated with Defendants and to divert those funds to a holding account. Pursuant to the Court's December 4, 2020 Order, Plaintiffs served Defendants with a copy of the Complaint and Amended Complaint together with copies of the Ex Parte Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets, and the Court's December 4, 2020 Temporary Restraining Order, thereby providing notice and copies of the December 4, 2020 Temporary Restraining Order and Plaintiffs' Ex Parte Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets via email to each Defendant's corresponding email/online contact form, and by posting copies of the Temporary Restraining Order and all other pleadings and documents on file in this action on the website located at http://servingnotice.com/k10r9/index.html. Thereafter, Certificates of Service were filed confirming service on each Defendant, ECF Nos. [21] and [22].

II. <u>LEGAL STANDARD</u>

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) (applying the test to a preliminary injunction in a Lanham Act case).

III. ANALYSIS

The declarations Plaintiffs submitted in support of their Motion for Preliminary Injunction support the following conclusions of law:

- A. Plaintiffs have a strong probability of proving at trial that consumers are likely to be confused by Defendants' advertisement, promotion, sales, offer for sale, and/or distribution of goods bearing and/or using counterfeits, reproductions, or colorable imitations of Plaintiffs' Marks, and that the products Defendants are selling and promoting for sale are copies of Plaintiffs' products that bear copies of Plaintiffs' Marks;
- B. Because of the infringement of Plaintiffs' Marks, Plaintiffs are likely to suffer immediate and irreparable injury if a preliminary injunction is not granted. It clearly appears from the following specific facts, as set forth in Plaintiffs' Amended Complaint, Motion for Preliminary Injunction, and accompanying declarations on file, that immediate and irreparable loss, damage, and injury will result to Plaintiffs and to consumers because it is more likely true than not that:
- 1. Defendants own or control Internet based e-commerce stores and an Internet website operating under their Seller IDs and Subject Domain Name which advertise, promote, offer for sale, and sell products bearing and/or using counterfeit and infringing trademarks in violation of Plaintiffs' rights; and
- 2. There is good cause to believe that more counterfeit and infringing products bearing Plaintiffs' trademarks will appear in the marketplace; that consumers are likely to be misled, confused, and disappointed by the quality of these products; and that Plaintiffs may suffer loss of sales for their 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 Plaintiffs, their respective reputations, and their goodwill as manufacturers and distributors of quality products, if such relief is not issued.
- D. The public interest favors issuance of the preliminary injunction to protect Plaintiffs' trademark interests and protect the public from being defrauded by the palming off of counterfeit goods as Plaintiffs' genuine goods.
- E. Under 15 U.S.C. § 1117(a), Plaintiffs may be entitled to recover, as an equitable remedy, the illegal profits gained through Defendants' distribution and sales of goods bearing and/or using counterfeits and infringements of Plaintiffs' Marks. *See Reebok Int'l, Ltd. v. Marnatech 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.*, 51 F.3d at 987 (11th Cir. 1995) (citing *Federal Trade Commission v. United States Oil and Gas Corp.*, 748 F.2d 1431, 1433-34 (11th Cir. 1984)); and
- G. In light of the inherently deceptive nature of the counterfeiting business, and the likelihood that Defendants have violated federal trademark laws, Plaintiffs have 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. <u>CONCLUSION</u>

Accordingly, it is **ORDERED AND ADJUDGED** that Plaintiffs' Motion, **ECF No. [7]**, is **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 enjoined and restrained until further Order of this Court:
 - a. From manufacturing, importing, advertising, promoting, offering to sell, selling, distributing, or transferring any products bearing and/or using Plaintiffs' Marks, or any confusingly similar trademarks, other than those actually manufactured or distributed by the Plaintiffs; and
 - b. From secreting, concealing, destroying, selling off, transferring, or otherwise disposing of: (i) any products, not manufactured or distributed by Plaintiffs, bearing and/or using Plaintiffs' 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 and/or using Plaintiffs' Marks, or any confusingly similar trademarks; or (iii) any assets or other financial accounts subject to this Order, including inventory assets, in the actual or constructive possession of, or owned, controlled, or held by, or subject to access by, any Defendant, including, but not limited to, any assets held by or on behalf of any Defendant.
- (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 Plaintiffs' Marks or any confusingly similar trademarks, on or in connection with all Internet websites and Internet based e-commerce stores owned and operated, or controlled by them, including the Internet based e-commerce stores and Internet website operating under the Seller IDs and Subject Domain Name;
- (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

Plaintiffs' 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 that are visible to a computer user or serves to direct computer searches to Internet based e-commerce stores and Internet website registered, owned, or operated by any Defendant, including the Internet based e-commerce stores and Internet website operating under the Seller IDs and Subject Domain Name;

- (4) Each Defendant shall not transfer ownership of the Internet based e-commerce stores and Internet website operating under their Seller IDs and Subject Domain Name during the pendency of this action, or until further order of the Court;
- (5) Each Defendant shall continue to preserve copies of all computer files relating to the use of any of the Seller IDs and Subject Domain Name and shall take all steps necessary to retrieve computer files relating to the use of the Seller IDs and Subject Domain Name that may have been deleted before the entry of this Order;
- (6) Upon receipt of notice of this Order, the Defendants and all financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to, Alibaba.com Hong Kong Limited, which operates the AliExpress.com platform ("AliExpress"), Zhejiang Ant Small and Micro Financial Services Group Co., Ltd. ("Ant Financial Services"), AliPay (China) Internet Technology Co. Ltd. and Alipay.com Co., Ltd. (collectively, "Alipay"), Amazon Payments, Inc. ("Amazon"), PayPal, Inc. ("PayPal"), SIA Joom, which operates the Joom.com platform ("Joom"), ContextLogic, Inc., which operates the Wish.com website ("ContextLogic"), Dunhuang Group which operates the DHgate.com and DHPay.com platforms, and their related companies and affiliates shall, to the

extent not already done, (i) immediately identify and restrain all funds in all financial accounts and/or sub-accounts associated with the Internet based e-commerce stores and Internet website operating under the Seller IDs and Subject Domain Name, store numbers, merchant identification numbers, infringing product numbers, and/or the e-mail addresses identified on Schedule "A" hereto, as well as any other related accounts of the same customer(s); (ii) identify all other accounts which transfer funds into the same financial institution account(s) or any of the other financial accounts subject to this Order; (iii) restrain the transfer of all funds, as opposed to ongoing account activity, held or received for their benefit or to be transferred into their respective financial accounts, and any other financial accounts tied thereto; and (iv) immediately divert those restrained funds to a holding account for the trust of the Court.

(7) Upon receipt of notice of this Order, the Defendants and all financial institutions, payment processors, bank, escrow services, money transmitters, or marketplace platforms receiving notice of this Order, including but not limited to, AliExpress, Ant Financial Services, Alipay, Amazon, PayPal, Joom, ContextLogic, Dunhuang Group which operates the DHgate.com and DHPay.com platforms, Camel FinTech Inc., and their related companies and affiliates, shall further, to the extent not already done, provide Plaintiffs' counsel with all data that details (i) an accounting of the total funds restrained and identify the financial account(s) and sub-account(s) which the restrained funds are related to, and (ii) the account transactions related to all funds transmitted into the financial account(s) and sub-account(s) which have been restrained. No funds restrained by this Order shall be transferred or surrendered by any financial institution, payment processor, bank, escrow service, money transmitter, or marketplace website, including but not limited to, AliExpress, Ant Financial Services, Alipay, Amazon, PayPal, Joom, ContextLogic, Dunhuang Group which operates the DHgate.com and

DHPay.com platforms, Camel FinTech Inc., and their related companies and affiliates for any purpose (other than pursuant to a chargeback made pursuant to their security interest in the funds) without the express authorization of this Court;

- (8) This Order shall apply to the Seller IDs and Subject Domain Name, associated e-commerce stores and website, and any other seller identification names, domain names, e-commerce stores, websites, or financial accounts which are being used by Defendants for the purpose of counterfeiting Plaintiffs' Marks at issue in this action and/or unfairly competing with the Plaintiffs;
- (9) Any Defendant or financial institution account holder subject to this Order may petition the Court to modify the asset restraint set out in this Order;
- (10) As a matter of law, this Order shall no longer apply to any Defendant or associated e-commerce store or domain name dismissed from this action, or as to which Plaintiffs have withdrawn their request for a preliminary injunction;
- (11) Pursuant to 15 U.S.C. § 1116(d)(5)(D) and Federal Rule of Civil Procedure 65(c), Plaintiffs shall maintain their 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;
- (12) Additionally, for the purpose of providing additional notice of this proceeding, and all other pleadings, orders, and documents filed herein, the owners, operators and/or administrators of the Internet marketplace websites and/or financial institutions, payment processors, banks, escrow services, money transmitters, and marketplace platforms, including

but not limited to AliExpress, Ant Financial Services, Alipay, Amazon, PayPal, Joom, ContextLogic, Dunhuang Group which operates the DHgate.com and DHPay.com platforms, Camel FinTech Inc., and their related companies and affiliates shall, at Plaintiffs' request, provide Plaintiffs' counsel with any e-mail address known to be associated with the Defendants' respective Seller ID and Subject Domain Name;

(13) 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 Miami, Florida, on December 18, 2020.

BETH BLOOM UNITED STATES DISTRICT JUDGE

Copies to:

Counsel of Record via E-mail.

SCHEDULE A: DEFENDANTS' RESPECTIVE FINANCIAL ACCOUNTS/INFORMATION

Def. No.	Defendant / Seller ID or Subject Domain Name	Financial Account Information	Branded Item's ASIN / Infringing Product Number
1	AirTnMax Store	5874011	20000002886334
2	BARAN AYDIN Store	5974458	1005001438472949
3	Factory Sneaker Store	910324026	4001335301493
	Global female spirit		
4	trend Store	5885427	4001360391532
		manni37628667@163.com	
5	GoBuy-Y Store	Store No. 5494093	4000607097217
6	GYXS-STAR Store	910330130	1005001322397939
7	HeLeaf Store	5606065	4001069138793
		15730019245@163.com	
8	HomelyVersal Store	Store No. 4604015	33044320936
		381033953@qq.com	
9	ONLNIC Store	Store No. 3145008	1005001331934835
10	pink tomoto fur Store	1472278	1005001567178144
11	Shop4418001 Store	4418001	4000947257974
12	Shop5240197 Store	5240197	10000389710428
13	Shop5591059 Store	5591059	4000939963939
14	Shop5626153 Store	5626153	1005001536772317
15	Shop5633157 Store	5633157	4000820699549
16	Shop5723069 Store	5723069	4001027131989
17	Shop5781552 Store	5781552	1005001376065783
18	Shop900236246 Store	900236246	1005001399658835
19	Shop900254249 Store	900254249	1005001415666090
20	Shop910320091 Store	910320091	1005001396015344
21	Shop910348115 Store	910348115	10000424457814
22	Shop910349117 Store	910349117	1005001314277014
23	Shop910364203 Store	910364203	1005001506957494
24	Shop910372227 Store	910372227	1005001346162046
25	Shop910567268 Store	910567268	1005001485412328
26	Shop910570263 Store	910570263	1005001466850075
27	Shop910655015 Store	910655015	1005001598228477
28	SOLUDOSO Store	5834070	1005001501202642
29	SPX-GROUP Store	910357328	1005001453516909
30	Turquaz Store	900251167	1005001403597624
31	yuchenmaoyi Store	910619004	1005001512519102
32	AxxuuShop	A34VMGMJ8H79BS	B07VWF1Q4K
33	Hpwas	A3TTYBHSIAGEMA	B07VWF1Q4K
34	Per Zeal	A2V0GGS1757V6A	B081DWPF8T B08GKQL7PZ

Def. No.	Defendant / Seller ID or Subject Domain Name	Financial Account Information	Branded Item's ASIN / Infringing Product Number
35	SANHION	A24XT1ZC8N9645	B07YDQCV7Q B07PRL9WBK
33	DI II (III OI)	112 111 12 001 (30 13	B07YZGY2CK
36	xinta5015	A22ZTA8VKCD23	B07XRLJPQ1
37	YGSM	A3359MOO4VTF89	B08H5M44PM
38	cmofashion.com	payment@kisscas.com	
39	first-and-best	tharidu7th@gmail.com	
40	imaasmuj-0	asmuji.imam17@yahoo.com	IMAM ASMUJI
41	lemonjy-19109	zengq9305@163.com	
42	lumo_7459	mooreluke196@gmail.com	392546363928
43	renun-mala	renunganmalam12@gmail.com	RENUNGANMAL
44	ressyol_0	ressa.yola793@gmail.com	RESSAYOLA79
45	s1sw4_xyz	wsis403@yahoo.com	402454746719
46	sg8450048-3	gunawansempak1@gmail.com	GUNAWANSEMP
47	shha-3126	shonhaji587@yahoo.com	SHONHAJI587
48	suggle_0	sugenggleder78@gmail.com	SUGENGGLEDE
		1521102362932853247-84-3-	
49	Big Boom.	26193-2518758043	5d47f48e8b2c3701010460ae
50	burbuybuy3	5e390d6b1436d40301680acd	5e3ce5858b45130101f751de
51	Cyan.	5cb819028b45130301997268	5d45555c1436d401011d8978
52	Fairy Jewelry Two	5d95493c28fc71030132422f	5dcf4a8d8b451301018bc8e0
53	HotwaterDDD	5d1198178b2c3703011bb641	5d47f48e8b2c3701010460ae
54	HUIYA-JJY1	5cce3d008b45130301e991e3	5cf77ce46ecda80101a58449
55	i Bags	5df870af8b4513030108f648	5e0467ef8b2c3701010b377b
56	Locosweet	5d119ae68b2c3703011bdb24	5d47fb411436d401015b4ba8
57	QBQlueluelue	5d1198bc8b2c3703011bbf12	5e1d622d36b54d0101f1b0d3
58	QJINTIMATES	5ad54e2d8b2c3703814d5c13	5ccf98468b45130101fe18c2
	RMM Jewelry Office		
59	Store	5b6e9e881436d403a1a9fc7e	5b90ef281436d40171ab5f0d
60	SLivest	5d3919f636b54d0301b6b460	5d3a8cfd28fc710101e325b8
61	Struck	5af5301e1436d4031416f3c4	5d66525f1436d40101c18a06
62	Watty	5b14fa651436d40306a6c318	5e7f125b28fc710101649628
		1504771255816538134-135-3-	
63	Wright	26193-2999195761	5e43c9d68b2c370101411330
64	YBH009	5dafc1f136b54d030149a413	5ea13aaa8b451301011338b4
65	yingyingying	1519287985595566570-168-3- 709-4052532329	5d47fb411436d401015b4ba8
66	Bangkok Bromello	5f8612d5588d3a0049b97a27	5f8f952feda09e3165d0f5c8
67	Chengxiaowei	59660d544b913a66ef55616d	59c9062177cc4e6822b6f6ce
68	Cool small appliances	57834ed5f1ab1f1150bea6e9	5b8e337a1f48db1a2accc2d9
69	coriastore	5e5737f3579a4416037f6224	5e5b49d099d83aad19fd337a
70	huabang	5b1fa32bdaac450e927aa26b	5daab70e0c06280c81496e03

Def.	Defendant / Seller ID or Subject	Financial Account	Branded Item's ASIN /
No.	Domain Name	Information	Infringing Product Number
71	ivettelopez	5f4339968dc68c8e2cb3bb7e	5f6abbb33e645badc0590210
72	mcsmistedmoa	5e910b112522bc14f3c767c4	5f6962b6f949c90044d4d43d
73	Miss you grocery store	5b853f47c62b5518d7c48429	5cf5dea165cf1b40fbfacbd7
74	Pretty Purse	5f73a8051d28c82b974b30c3	5f73be878fd7950041d5fe97
75	sxzyyouth53	5a30dd15dc7a910d7a7ecf2d	5d8b35b7641b0808fa336311
76	zhangjianjun	583eeb56f097ec1b8a861212	5cadf203ad16db2873048a35
77	ZLX888888	5915300f7547937a28c818cd	5d71de9cebeacc531c9cdef7
78	a191427609	21145239	564947774
79	Ace216	21163547	465127976
80	ado527	21193874	472030466
81	Aihyhy123	21421913	513374603
82	Aiyinghai	21135284	433005002
83	aiyingying2019	21123395	462136056
84	Amiri hongkong	21251655	467643560
85	amwu123	21142639	512503607
86	anni001	21167044	518568595
87	asd2023138	21196856	564271362
88	ashop369	20968696	506506453
89	b332492	21556510	561125919
90	b332493	21554891	559057462
	Baichengstore01 a/k/a		
91	TopSportmarket1688	21050386	479522407
92	baitong512	21062999	457111213
93	Baobao8866	21057019	526654889
94	baoge66	21441828	561148998
95	baolanbelt	21357514	571762043
96	Bdwuhaodian	21218622	516649382
97	Belt588888	21410076	504780530
98	Belt888pp	21102566	422187262
99	Beltbrand08	21085066	510531859
100	Beltbrandaaa3	21432729	515797378
101	Beltluo1314	21412760	505408844
102	Bggoo	21227547	508588683
103	bick_jewelry	21090062	555514064
104	boutique_store_01	21567604	569065269
105	brand_logo_mm	21133397	556264226
106	Brand520	21163564	436522226
107	bucksstore	21358124	571805537
108	Casualshoes0021	21246293	483590567
109	casualv9	21085193	568978547
110	cc0917	21545313	552185948
111	chandlershop	21357526	571976350

Def. No.	Defendant / Seller ID or Subject Domain Name	Financial Account Information	Branded Item's ASIN / Infringing Product Number
112	chen789	20629597	530372026
113	chen999	21386423	532499918
114	chenjuhao668	21427235	512843771
115	Chenlu2202	21244769	515939049
116	chicagoshop	21358384	571410246
117	Children2018	20979653	499892247
118	clothes_shoe_store_2	21533633	546867191
119	cuciwatch	20696585	524151017
120	cwj520	21276651	488200492
121	cwj668	21412053	505959031
122	Cy2345	21425305	515024537
123	dd886	21264775	515586731
124	deandrebags	21357521	571848065
			505216475
125	deluxejewelry	21381273	564592586
126	Designer_shoe_2019	21218539	514848069
127	dg88888	21398654	572975357
128	Dhgate5858	21111221	515797819
129	dhh0307	21269374	505657960
130	dhxiaol	21107130	531298070
131	dhzhenghaiy	21123321	534450686
132	dioo_03	21568155	569516204
133	dioo_05	21570824	572029957
134	Dsf197512	21237407	449932396
135	dwdw008	21061730	526959821
136	dyh16031	21430514	527513245
137	Dzxgs888	21345306	526904314
138	Dzxgsww	21345579	526946876
139	Ess277	21329298	508428997
140	factorystore2016	20297925	463284564
141	fancy_shoes1	21248737	528244993
142	fantasyjewelry888	21392902	537921627
143	Fashioga	21173761	514654286
144	fashion_shoes002	20901914	528292737
145	fashion_shoes580	21051773	528296958
146	fashion_shoes888	20738773	528305588
147	fashion_shoes998	21010340	528302006
148	fashionbrandbags2021	21439379	580596801
149	fashionjewelry886	21025929	526621436
150	Feng169	21414202	507362510
151	fjbagstoday	21464041	550836574
152	freepat	21501637	543340885

Def. No.	Defendant / Seller ID or Subject Domain Name	Financial Account Information	Branded Item's ASIN / Infringing Product Number
153	g710026851	21554034	561140109
154	gods_shop_shoes_02	21524323	542996051
155	good_shop116	21099786	514762226
156	Grass1	20986356	457136844
157	Gucci16888	21361618	526852046
158	Hackermissac	21136130	515243679
159	Haihaiying2019	21295094	514431436
160	handbags06	21558810	561544568
161	hanmeimeibags	21357781	571748340
162	hhh1	21556892	559851454
163	hhjj265	21123358	455297765
164	hhl1213	21276374	567495895
165	Hi_wow	21153018	505712487
166	high_quaity_shoes_01	21518463	543536188
167	Highquality323	21419874	515212310
168	highqualitystore998	21418962	515338929
169	hkj662604	21411875	505085810
170	hnh1938	20914451	455298820
171	homec	21227836	503977171
172	huan505090842	21177833	567446222
173	hx521	21161297	470641873
174	Hyy0429	21202716	441367055
175	iphoney6	21210062	583069377
176	isok	21206457	484593740
177	jackbelt	21357777	571659268
178	jiji2074	21548085	553512834
179	jincheng8888	21550479	556276384
180	jinsheng66	21182686	436833998
181	jinteng58	21548264	555703686
182	July01	21125429	533141932
183	kiko6	20599612	463300742
184	Kirin002	21187512	514332660
185	langhua2019	21208860	489302835
186	laoye123	21086759	506579262
187	leegucci	21199350	492084844
188	Lemon6	20653387	466157037
189	lerben	21136646	567187235
190	Lhoo	21226335	506004928
191	li788348	20769521	513035961
192	liao0243420	21061228	477113314
193	libo001	21566791	571364310
194	lilishen666	21295322	474209544

Def.	Defendant /	Financial Account	Branded Item's ASIN /
No.	Seller ID or Subject Domain Name	Information	Infringing Product Number
195	lilu888	21554447	559008759
196	limeixie	21093763	530095980
197	Lj0902	21118046	514661324
198	lming1123	21413772	525901076
199	Logodhgate258	21422734	513922045
200	Longyuling2016fa	21290843	525914199
201	lovebaby666	21422593	511455273
202	lovefashion8	21190962	484602687
	Lq0qh0906 a/k/a		
203	LvShopers	20421200	485976517
204	Lqi123	21205401	527356896
205	luckyhome0711	21010722	547030202
206	Lucy986	21176310	527115373
207	luleilei	21121248	504350861
208	luxecollection	21247145	528268180
209	luxurybedding	21564597	570225607
210	Lvluxurystore	21434488	516123927
211	lwxshop	21357533	571997876
212	lxn250	21197692	504676518
213	marrybetter	21102149	422589619
214	mensfashion11	21549297	553872146
215	ming919298	21185286	437198157
216	mm0917	21548262	553253889
217	Mn180	21224414	464098341
218	Newbags2019	21196031	476007530
219	ngwbkbxxn	21429029	551604367
220	Nice2019	21204256	527725988
221	nikeairmaxinvigor	21104566	517049349
222	Ohmygod11	21433715	516221200
223	Outdoorsport_1	21414211	511547142
224	Pan39393399	21345461	508195704
225	Perfect_v8	20826136	514927731
226	Pippenshoes	21083698	449822193
227	porzingisshoes	21357793	571853285
228	premium_store_shoes	21497463	539191791
229	Q13319482396	21449037	527365258
230	qiye002	21410534	556268678
231	qiye006	21410784	516685835
232	qiye2020	21410226	549462710
233	quennel_luxury_facto	21224383	517449330
234	Race_sneaker_factory	21224607	514487973
235	Redbottoms886	21263637	516238277

Def. No.	Defendant / Seller ID or Subject Domain Name	Financial Account Information	Branded Item's ASIN / Infringing Product Number
236	Rhytonsneaker	21161898	479691477
237	rookiepolos	21357517	571898303
238	Rui585888	21191847	474924801
239	ruiaji123	21225980	478531544
240	Ruirui1688	21185448	486914510
241	runningwithme10	21228386	561168245
242	Sheng8800	20939378	466342306
243	shoe_base118	21110092	528276465
244	shoe_seller18018	21122634	528307796
245	shoes_base	21107631	528303116
246	shoes_base118	21147558	528338227
247	shoes_factory118	21112344	528341646
248	shoes_suppliers888	21107617	528278405
249	shoes_wholesaler118	21148835	528294898
250	shopwatch	21401572	505034360
251	shuainan18688	21247366	478650481
252	shuhuangzhen	21464139	530580978
253	Shulinshoesshop888	20819009	475265316
254	siyuexiaocha	20034813	475637586
255	skynorthface	21217649	567208735
256	smartbabystore	21169479	491039963
257	smithbelt	21357774	571644727
258	smj849880872	20972025	550283562
259	sneaker2019	21098826	568942747
260	Sneakersfr	21273593	481049527
261	soccer_jersey2019	21211314	526916857
262	Soloka_bag_store	21357772	527836718
	Sportmarket001 a/k/a		
263	Mcqueen Shoe	21046802	488729823
	sports shoes a/k/a		
264	mvp350boost	20819734	493244462
265	sports0shoes	21081257	512715345
266	sshoe1	21552681	562573209
267	ssshoe	21560859	565161971
268	sunjingrong	20981174	492797361
269	supplierwatch	21224483	529456656
270	surperme521	21207424	500884708
271	sw_watches	20788327	531495315
272	Tang15388	21418952	526649130
273	theshybelt	21357512	571790585
274	tradeworld001	21374845	515364532
275	trytrytry	20803847	485660692

Def. No.	Defendant / Seller ID or Subject Domain Name	Financial Account Information	Branded Item's ASIN / Infringing Product Number
276	tshirts668	21466679	525718656
277	Tttt555	21162844	526730530
278	upline	21557000	561901427
279	vj6677	20899929	504002224
280	vv577uu	21563468	566710219
281	W76532703	21186852	438075162
282	Wadeluo	20981510	490766009
283	watch1888	21066184	551901979
284	watches2019_1	21357501	571600626
285	watchok	21439686	522671158
286	wb12	21168195	560236786
287	wert88898	20539551	495486737
288	Wsdyyy	21162815	434064848
289	wufeizhi1990	21202510	571729037
290	wujin1314	21039766	514962437
291	Ww66871bb	21226028	514159408
292	www5822	21397996	510165267
293	x0610	21466904	569153028
294	X998	20826230	411384755
295	Xiangguibagsoes2020	21427206	514621297
296	Xiangxiang2015	21225976	474595925
297	Xiaohan11	21044304	478420483
298	Xiaomao58	21227961	527731906
299	xingxing2b	21531758	554150825
300	xsguoji_001	21528080	545603683
301	xue998	21160567	461531533
302	xx992	21230658	458541659
303	xx994	21217683	560835419
304	y0218	21464432	567513949
305	Yangbie1203	21425805	512362188
306	ycf1638812	21226196	504344854
307	ycf1638813	21226388	504370266
308	yd1996	21433365	573162678
309	ye08175012	21171594	504576609
310	yeezy750_2019	21241203	499112860
311	Yhws1388	21162702	527201677
312	yidalifushi	21307627	506174131
313	Yingbaiaini1314	21162710	433591958
314	yinhong2	21163350	456742062
315	Yomeiyo	20907407	471038462
316	you002	20915739	476235295
317	Ysm3344	21226401	475815495

Def. No.	Defendant / Seller ID or Subject Domain Name	Financial Account Information	Branded Item's ASIN / Infringing Product Number
318	yttfyift	21169679	569016893
319	yundu693	21492179	567498747
320	yunqi122	21513105	559114736
321	Yuwe68444	21108308	471855665
322	Yxl86	20326067	506026331
323	yyang6868	21121483	505182529
324	z18673378183	21405111	571422282
325	z202078	21550470	571671098
326	zelingbaby	21133659	461514991
327	Zhangchen147	21414491	507273502
328	zhouhuixiang09	21478142	531002101
329	zhsgdhr123	19171152	588257229
330	Zhujuan1987	21248486	529516295
331	zling0918	21414011	516933671
332	Zsh8888	21195761	449452435
333	Zteng1122	21227665	454117715
334	zuonianzg6	21086561	504736036
335	zxc168666	20716862	407240524
336	zxcvb168	21209704	491453839
337	Zyh2019	21411019	505498821
338	zym1995	21220074	504138791
339	Zyp1971126	21204334	447784138
340	zz984	21207169	560293545