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15 *Attorneys for Plaintiff*  
16 *LOUIS VUITTON MALLETIER, S.A.*

17 THE UNITED STATES DISTRICT COURT  
18 FOR THE DISTRICT OF NEVADA

19 LOUIS VUITTON MALLETIER, S.A., )  
20 a foreign business entity, )

21 Plaintiff, )

22 v. )

23 THE PARTNERSHIPS and )  
24 UNINCORPORATED ASSOCIATIONS )  
25 IDENTIFIED ON SCHEDULE "A" and )  
26 DOES 1-1000, )

27 Defendants. )  
28 )

Case No.

**COMPLAINT FOR INJUNCTIVE RELIEF**

29 Plaintiff Louis Vuitton Malletier, S.A., ("Plaintiff" or "Louis Vuitton") hereby sues  
30 Defendants, The Partnerships and Unincorporated Associations indentified on Schedule "A" hereto  
31 and Does 1-1000 (collectively "Defendants"), and alleges as follows:

**JURISDICTION AND VENUE**

32 1. This is an action pursuant to 15 U.S.C. §§ 1114, 1116, 1121 and 1125(a) and (d).  
33 Accordingly, this Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338.



1 the Louis Vuitton brand. The financial burden on Louis Vuitton and companies similarly situated is  
2 staggering as is the resulting burden on the Federal court system.








3 **THE DEFENDANTS**

4 6. Defendants are partnerships or unincorporated business associations which reside on  
5 servers in the United States and are comprised of individuals and business entities of unknown  
6 makeup who likely reside in the People's Republic of China or other foreign jurisdictions with lax  
7 trademark enforcement systems. Defendants have the capacity to be sued pursuant to Federal Rule  
8 of Civil Procedure 17(b). Defendants conduct business throughout the United States, including  
9 within this Judicial District through the operation of the fully interactive commercial websites  
10 operating under the Subject Domain Names identified on Schedule "A" hereto. Defendants also  
11 operate blog style websites under some of the Subject Domain Names which also provide support  
12 and direct customer traffic to the fully interactive websites operating under the other Subject Domain  
13 Names. Defendants are directly and personally contributing to, inducing and engaging in the sale of  
14 counterfeit products as alleged herein, often times as partners, co-conspirators and/or suppliers.  
15 Louis Vuitton is presently unaware of the true names of Does 1-1,000. Louis Vuitton will amend this  
16 Complaint upon discovery of the identities of such fictitious Defendants.

17 7. Defendants are the past and present moving and conscious forces behind the  
18 operation of the commercial Internet websites operating under the Subject Domain Names.

19 8. Upon information and belief, Defendants engage in the offering for sale and sale of  
20 counterfeit and infringing Louis Vuitton branded products within this Judicial District through  
21 multiple fully interactive commercial websites operating under at least the Subject Domain Names.  
22 Defendants, upon information and belief, also operate additional websites which promote and offer  
23 for sale counterfeit and infringing goods under domain names not yet known to Plaintiff.  
24 Defendants have purposefully directed their illegal activities towards consumers in the State of  
25 Nevada through the advertisement, offer to sell, sale and shipment of counterfeit Louis Vuitton  
26 branded goods into the State.



|   |  |           |                  |
|---|--|-----------|------------------|
| 1 |                         | 2,361,695 | June 27, 2000    |
| 2 | <br>LOUIS VUITTON PARIS | 2,378,388 | August 22, 2000  |
| 3 |                         | 2,399,161 | October 31, 2000 |
| 4 |                         | 2,421,618 | January 16, 2001 |
| 5 |                         | 2,773,107 | October 14, 2003 |
| 6 |                         | 3,023,930 | December 6, 2005 |
| 7 |                         | 3,051,235 | January 24, 2006 |

8 (the “Louis Vuitton Marks”) which are registered in International Classes 9, 14, 18, and 25, and are  
9 used in connection with the manufacture and distribution of, among other things, high quality  
10 handbags, wallets, luggage, shoes, belts, scarves, sunglasses, watches, and jewelry.

11 14. The Louis Vuitton Marks have been used in interstate commerce to identify and  
12 distinguish Louis Vuitton's high quality handbags, wallets, luggage, shoes, belts, scarves, sunglasses,  
13 watches, and jewelry and other goods for an extended period of time.

14 15. The Louis Vuitton Marks have never been assigned or licensed to any of the  
15 Defendants in this matter.

16 16. The Louis Vuitton Marks are symbols of Louis Vuitton's quality, reputation and  
17 goodwill and have never been abandoned.

18 17. Further, Louis Vuitton has expended substantial time, money and other resources  
19 developing, advertising and otherwise promoting the Louis Vuitton Marks. The Louis Vuitton Marks  
20 qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

21 18. Louis Vuitton has extensively used, advertised and promoted the Louis Vuitton  
22 Marks in the United States in association with the sale of high quality handbags, wallets, luggage,  
23 shoes, belts, scarves, sunglasses, watches, and jewelry, and other goods and has carefully monitored  
24 and policed the use of the Louis Vuitton Marks.

25 19. As a result of Louis Vuitton’s efforts, members of the consuming public readily  
26 identify merchandise bearing the Louis Vuitton Marks, as being high quality luxury goods sponsored  
27 and approved by Louis Vuitton.

28

1           20.     Accordingly, the Louis Vuitton Marks have achieved secondary meaning as  
2 identifiers of high quality handbags, wallets, luggage, shoes, belts, scarves, sunglasses, watches, and  
3 jewelry, and other goods.

4           21.     Genuine Louis Vuitton branded goods are widely legitimately advertised and  
5 promoted by Louis Vuitton, its authorized distributors and unrelated third parties via the Internet.  
6 Over the course of the past five to seven years, visibility on the Internet, particularly via Internet  
7 search engines such as Google, Yahoo! and Bing has become increasingly important to Louis  
8 Vuitton's overall marketing and consumer education efforts. Thus, Louis Vuitton expends  
9 significant monetary resources on Internet marketing and consumer education, including search  
10 engine optimization ("SEO") strategies. Those strategies allow Louis Vuitton and its authorized  
11 retailers to fairly and legitimately educate consumers about the value associated with the Louis  
12 Vuitton brand and the goods sold thereunder. SEO is a now common marketing process whereby a  
13 company or individual designs, supports, structures and phrases Internet website content in order to  
14 enhance a website's profile for search engines over a variety of search terms.

15           22.     Upon information and belief, at all times relevant hereto, Defendants in this action  
16 have had full knowledge of Louis Vuitton's ownership of the Louis Vuitton Marks, including its  
17 exclusive right to use and license such intellectual property and the goodwill associated therewith.

18           23.     Louis Vuitton has discovered Defendants are promoting and otherwise advertising,  
19 distributing, selling and/or offering for sale counterfeit products, including at least handbags, wallets,  
20 luggage, shoes, belts, scarves, sunglasses, watches, and jewelry bearing trademarks which are exact  
21 copies of the Louis Vuitton Marks (the "Counterfeit Goods"). Specifically, upon information and  
22 belief, Defendants are using the Louis Vuitton Marks in the same stylized fashion, for different  
23 quality goods.

24           24.     Defendants' Counterfeit Goods are of a quality substantially different than that of  
25 Louis Vuitton's genuine goods. Despite the nature of their Counterfeit Goods and the knowledge  
26 they are without authority to do so, Defendants are actively using, promoting and otherwise  
27 advertising, distributing, selling and/or offering for sale substantial quantities of their Counterfeit  
28 Goods with the knowledge that such goods will be mistaken for the genuine high quality products

1 offered for sale by Louis Vuitton. The net effect of Defendants' actions will be to result in the  
2 confusion of the relevant trade and consumers, both at the time of sale and in a post sale setting, who  
3 will believe Defendants' Counterfeit Goods are genuine goods originating from, associated with, and  
4 approved by Louis Vuitton.

5 25. Defendants advertise their Counterfeit Goods for sale to the consuming public. In so  
6 advertising these products, Defendants improperly and unlawfully use the Louis Vuitton Marks.  
7 Indeed, Defendants herein misappropriated Louis Vuitton's advertising ideas and entire style of  
8 doing business with regard to the advertisement and sale of Louis Vuitton's genuine products. Upon  
9 information and belief, the misappropriation of Louis Vuitton's advertising ideas in the form of the  
10 Louis Vuitton Marks has occurred, in part, in the course of Defendants' advertising activities and has  
11 been the proximate cause of damage to Louis Vuitton.

12 26. As part of their overall counterfeiting scheme, the Defendants are, upon information  
13 and belief, all employing substantially similar, and often times coordinated, SEO strategies based, in  
14 large measure, upon an illegal use of counterfeits of the Louis Vuitton Marks. Specifically, the  
15 Defendants are using counterfeits of Louis Vuitton's name and the Louis Vuitton Marks in order to  
16 make their websites selling illegal goods appear more relevant and attractive to search engines across  
17 an array of search terms. By their actions, the Defendants are causing concurrent and indivisible  
18 harm to Louis Vuitton and the consuming public by (i) depriving Louis Vuitton, its authorized  
19 distributors and other third parties of the ability to fairly compete for space within search engine  
20 results, (ii) causing an overall degradation of the value of the goodwill associated with the Louis  
21 Vuitton Marks and (iii) increasing Louis Vuitton's overall cost to market its goods and educate  
22 consumers about the brand via the Internet.

23 27. Upon information and belief, Defendants are concurrently conducting their  
24 counterfeiting and infringing activities at least within this Judicial District and elsewhere throughout  
25 the United States. As a result, Defendants are defrauding Louis Vuitton and the consuming public  
26 for Defendants' own benefit. Defendants' infringement and disparagement of Louis Vuitton does not  
27 simply amount to the wrong description of their goods or the failure of the goods to conform to the  
28 advertised quality or performance.

1           28. Defendants' use of the Louis Vuitton Marks, including the promotion and  
2 advertisement, reproduction, distribution, sale and offering for sale of their Counterfeit Goods, is  
3 without Louis Vuitton's consent or authorization.

4           29. Further, Defendants are engaging in the above-described illegal counterfeiting and  
5 infringing activities knowingly and intentionally or with reckless disregard or willful blindness to  
6 Louis Vuitton's rights for the purpose of trading on the goodwill and reputation of Louis Vuitton.

7           30. Defendants' above-identified infringing activities are likely to cause confusion,  
8 deception and mistake in the minds of consumers, the public and the trade. Moreover, Defendants'  
9 wrongful use of the Louis Vuitton Marks is likely to create a false impression and deceive  
10 customers, the public and the trade into believing there is a connection or association between Louis  
11 Vuitton and Defendants' Counterfeit Goods.

12           31. Louis Vuitton has no adequate remedy at law.

13           32. Louis Vuitton is suffering irreparable and indivisible injury and damages as a result  
14 of Defendants' unauthorized and wrongful use of the Louis Vuitton Marks. If Defendants'  
15 counterfeiting and infringing activities are not preliminarily and permanently enjoined by this Court,  
16 Louis Vuitton and the consuming public will continue to be harmed.

17           33. The injuries and damages sustained by Louis Vuitton have been directly and  
18 proximately caused by Defendants' wrongful reproduction, use, advertisement, promotion, offering  
19 to sell, and sale of their Counterfeit Goods.

20           34. Louis Vuitton has retained the undersigned counsel to represent it in this matter and is  
21 obligated to pay said counsel a reasonable fee for such representation.

22           **COUNT I - TRADEMARK COUNTERFEITING AND INFRINGEMENT**

23           35. Louis Vuitton hereby readopts and re-alleges the allegations set forth in Paragraphs 1  
24 through 34 above.

25           36. This is an action for trademark counterfeiting and infringement against Defendants  
26 based on their use of counterfeits of the Louis Vuitton Marks in commerce in connection with the  
27 promotion, advertisement, distribution, sale and/or offering for sale of the Counterfeit Goods.





1 confusion in the trade and among the general public as to at least the origin or sponsorship of the  
2 Counterfeit Goods.

3 45. Defendants, upon information and belief, have used in connection with their sale of  
4 Counterfeit Goods, false designations of origins and false descriptions and representations, including  
5 words or other symbols and trade dress which tend to falsely describe or represent such goods and  
6 have caused such goods to enter into commerce with full knowledge of the falsity of such  
7 designations of origin and such descriptions and representations, all to the detriment of Louis  
8 Vuitton.

9 46. Specifically, Defendants have authorized an infringing use of the Louis Vuitton  
10 Marks, in Defendants' advertisement and promotion of their counterfeit and infringing handbags,  
11 wallets, luggage, shoes, belts, scarves, sunglasses, watches, and jewelry. Defendants have also  
12 misrepresented to members of the consuming public that the Counterfeit Goods being advertised and  
13 sold by them are genuine, non-infringing products.

14 47. Additionally, Defendants are using counterfeits of the Louis Vuitton Marks in order  
15 to unfairly compete with Louis Vuitton and others for space within search engine organic results,  
16 thereby depriving Louis Vuitton of a valuable marketing and educational tool which would  
17 otherwise be available to Louis Vuitton.

18 48. Defendants' above-described actions are in violation of Section 43(a) of the Lanham  
19 Act, 15 U.S.C. §1125(a).

20 49. Louis Vuitton has sustained indivisible injury and damage caused by Defendants'  
21 concurrent conduct, and absent an entry of an injunction by this Court, Louis Vuitton will continue  
22 to suffer irreparable injury to its goodwill and business reputation as well as monetary damages.

23 **COUNT III - CLAIM FOR RELIEF FOR CYBERPIRACY**

24 **UNDER §43(d) OF THE LANHAM ACTION, 15 U.S.C. §1125(d)**

25 50. Louis Vuitton hereby readopts and re-alleges the allegations set forth in Paragraphs 1  
26 through 34 above.

27 51. At all times relevant hereto, Louis Vuitton has been and still is the owner of the  
28 rights, title and interest in and to the Louis Vuitton Marks.





1 hosts, domain-name registrars and domain-name registries that are provided with notice of the  
2 injunction, cease facilitating access to any or all domain names and websites through which  
3 Defendants engage in the sale of counterfeit and infringing goods using the Louis Vuitton Marks.

4 c. Entry of an Order that, upon Louis Vuitton's request, the top level domain  
5 (TLD) Registries for the Subject Domain Names place the Subject Domain Names on Registry Hold  
6 status, thus removing them from the TLD zone files maintained by the Registries which link the  
7 Subject Domain Name to the IP address where the associated website is hosted.

8 d. Entry of an order canceling or, at Louis Vuitton's election, transferring the  
9 Subject Domain Names and any other domain names used by the Defendants to engage in their  
10 counterfeiting of the Louis Vuitton Marks at issue to Louis Vuitton's control so they may no longer  
11 be used for illegal purposes.

12 e. Entry of an order that, upon Louis Vuitton's request, the Internet Corporation  
13 for Assigned Names and Numbers ("ICANN") and the Internet Assigned Numbers Authority  
14 ("IANA") shall each take all actions necessary to ensure that the top level domain Registries  
15 responsible for the Subject Domain Names transfer and/or disable the Subject Domain Names as  
16 directed by the Court.

17 f. Entry of an award of Louis Vuitton's costs and reasonable attorneys' fees and  
18 investigative fees associated with bringing this action.

19 g. Entry of further relief as the Court may deem just and proper.

20 Dated: March \_\_\_, 2011

Respectfully submitted,

21 By: /s/ Ryan E. Johnson

22 Ryan E. Johnson (Nevada Bar # 9070)

23 WATSON ROUNDS

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24 *Of Counsel:*

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Ft. Lauderdale, Florida 33301

27 *Attorneys for Plaintiff*

28 *LOUIS VUITTON MALLETIER, S.A.*

**SCHEDULE A**  
**THE PARTNERSHIPS and UNINCORPORATED ASSOCIATIONS**

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- Defendant 1: 1854louisvuitton.com
- Defendant 2: 21centurybags.co
- Defendant 3: 21replica.com
- Defendant 4: 3areplicawatch.com
- Defendant 5: 7starplanet.com
- Defendant 6: 86handbags.com
- Defendant 7: 960watch.com
- Defendant 8: abag2u.com
- Defendant 9: acereplica.com
- Defendant 10: amazing-bags.com
- Defendant 11: amazingreplica.com
- Defendant 12: bagreplicator.com
- Defendant 13: bagsfactory.net
- Defendant 14: bagspart.com
- Defendant 15: besthandbagsstore.mdsoll.cn
- Defendant 16: bestmirrorbrands.com
- Defendant 17: best-replica-watch.com
- Defendant 18: best-replica-watches.com
- Defendant 19: beubag.com
- Defendant 20: bipurse.com
- Defendant 21: brandkeys.net
- Defendant 22: buyawatches.com
- Defendant 23: buycheapluxury.com
- Defendant 24: buyreplicahandbags.info
- Defendant 25: buysns.com
- Defendant 26: cadudu.com
- Defendant 27: chinese-replica.net
- Defendant 28: chinese-replicas.com
- Defendant 29: cnreplica-handbags.com
- Defendant 30: copycatshades.com
- Defendant 31: countbags.com
- Defendant 32: dedoro.com
- Defendant 33: designer-handbag-replica.com
- Defendant 34: designer-replicahandbags.com
- Defendant 35: discountbagsoutlet.com
- Defendant 36: discount-designer-bags.com
- Defendant 37: eluxuryking.com
- Defendant 38: eluxurys-mart.net
- Defendant 39: eluxuryxp.com
- Defendant 40: eshop4bags.com
- Defendant 41: etopbagss.com
- Defendant 42: exquisitebag.com
- Defendant 43: fabaaa.com
- Defendant 44: fakehandbagshome.com
- Defendant 45: fashionbagzoom.com a/k/a vuittonworld.com

1 Defendant 46: fashionboutiqueshop.com  
2 Defendant 47: fashionladybag.com  
3 Defendant 48: fashion-replica-bags.com  
4 Defendant 49: ffchloe.com  
5 Defendant 50: forevercbs.com  
6 Defendant 51: galaxysahandbags.com  
7 Defendant 52: goodluxuryshop.com  
8 Defendant 53: gooodbag.com  
9 Defendant 54: goto-watches.com  
10 Defendant 55: grabshandbags.com  
11 Defendant 56: groundmart.com  
12 Defendant 57: handbag20.com  
13 Defendant 58: handbag4s.com  
14 Defendant 59: handbagforever.com  
15 Defendant 60: handbagsbeauty.com  
16 Defendant 61: handbagsidol.com  
17 Defendant 62: handbagsmama.net  
18 Defendant 63: handbagsonsaleus.com  
19 Defendant 64: handbags-sales.com  
20 Defendant 65: handbagswin.com  
21 Defendant 66: handbagswow.com a/k/a creplicahandbags.com  
22 Defendant 67: haoreplica.com  
23 Defendant 68: herebagss.org  
24 Defendant 69: hereisbag.com  
25 Defendant 70: hightbrand.com  
26 Defendant 71: highwaywatches.com  
27 Defendant 72: honey-replicas.com  
28 Defendant 73: honey-replicas.net a/k/a honey-replicas.co  
Defendant 74: hot-louisvuitton.com  
Defendant 75: huebags.com  
Defendant 76: impostercity.com  
Defendant 77: ireplical.net  
Defendant 78: itisdesigners.com  
Defendant 79: itisreplicas.com  
Defendant 80: jajashopping.com  
Defendant 81: jeanybags.com  
Defendant 82: knockoff-bags.com  
Defendant 83: knockoffhandbagsa.com  
Defendant 84: knockoffnamebag.com  
Defendant 85: louisvuitton4bag.com a/k/a eluxury4all.com  
Defendant 86: louisvuittonbrandbag.com  
Defendant 87: louisvuittonbrandbags.com  
Defendant 88: louisvuittonhandbagsshop.com  
Defendant 89: louisvuittonoutletonline.net  
Defendant 90: louisvuitton-outlet-stores.com a/k/a louis-vuitton-outlet-stores.net  
Defendant 91: louisvuittonreplica.org  
Defendant 92: louis-vuitton-replicas.com  
Defendant 93: louisvuittonsale-shop.com

1 Defendant 94: louisvuittonstuff.com  
2 Defendant 95: luxury-estore.com  
3 Defendant 96: luxurymirrorbrands.com  
4 Defendant 97: lv2get.com  
5 Defendant 98: lvbags.cc  
6 Defendant 99: lvoutletsale.com a/k/a e-fashionshopping.com and luxury-estore.com  
7 Defendant 100: lvuksale.com  
8 Defendant 101: memwatches.com  
9 Defendant 102: mirrorbrands.com  
10 Defendant 103: mobigarden.com  
11 Defendant 104: mybagwow.com a/k/a handbagsmars.com  
12 Defendant 105: mychanelhandbags.com  
13 Defendant 106: mylvlife.com  
14 Defendant 107: myshopwww.com  
15 Defendant 108: newbagsale.com a/k/a newbagpurse.com  
16 Defendant 109: newlouisvuitton.com  
17 Defendant 110: nexthandbags.com  
18 Defendant 111: omegarecall.com  
19 Defendant 112: onebags.com  
20 Defendant 113: orderluxurybag.com a/k/a vuittonworld.com  
21 Defendant 114: perfect-replica-handbags.com a/k/a creplicahandbags.com  
22 Defendant 115: pop-handbags.com  
23 Defendant 116: popreplicas.com  
24 Defendant 117: popswisswatches.com  
25 Defendant 118: pop-watches.com  
26 Defendant 119: poshmoda.com  
27 Defendant 120: poshreplica.com  
28 Defendant 121: purereplicabags.com  
Defendant 122: pursestore.uk.com  
Defendant 123: pursestrade.com  
Defendant 124: replica2louisvuitton.com  
Defendant 125: replica4lv.com  
Defendant 126: replica4lvbags.com  
Defendant 127: replicabaghome.com  
Defendant 128: replica-bags8.com  
Defendant 129: replicadesignerhandbag.net  
Defendant 130: replicahandbagclub.com  
Defendant 131: replicahandbags4.com  
Defendant 132: replicahandbagsale-online.com  
Defendant 133: replicahandbagsbox.com  
Defendant 134: replicahandbagspro.com  
Defendant 135: replica-handbags-shop.com  
Defendant 136: replica-louis.com a/k/a lvhandbagsol.com  
Defendant 137: replicaok.net  
Defendant 138: replicasky.com  
Defendant 139: replicaslv.com  
Defendant 140: replica-watch.co  
Defendant 141: replicawatch-uk.com



1 Defendant 142: replicawell.com  
2 Defendant 143: replicawholesalesunglasses.com  
3 Defendant 144: salelouisvuitton.com  
4 Defendant 145: salelouisvuittonbags.com  
5 Defendant 146: seasoneshandbags.com  
6 Defendant 147: seasonsehandbags.com  
7 Defendant 148: sell-brands.com  
8 Defendant 149: sell-replica.com  
9 Defendant 150: shayes.com  
10 Defendant 151: shoplouisvuittonreplica.com  
11 Defendant 152: shopping-eluxury.com  
12 Defendant 153: shopyep.com  
13 Defendant 154: showmywatch.com  
14 Defendant 155: spotbags.net a/k/a pursevalley.com  
15 Defendant 156: superbaghome.com  
16 Defendant 157: super-replica.com  
17 Defendant 158: swissbestwatch.com  
18 Defendant 159: swissmirrorwatch.com  
19 Defendant 160: thehandbags.us  
20 Defendant 161: thereplicabag.com  
21 Defendant 162: thesunglassmanonline.com  
22 Defendant 163: thewatch88.com  
23 Defendant 164: topluxurystore.com  
24 Defendant 165: topreplicahandbags8.com  
25 Defendant 166: toshopbag.com  
26 Defendant 167: ugglvgucci.com  
27 Defendant 168: uuhandbags.com  
28 Defendant 169: voguebags.com  
Defendant 170: voguewear.com  
Defendant 171: walletsky.com  
Defendant 172: watch126.com  
Defendant 173: watchbrandhome.com  
Defendant 174: watchesbit.com  
Defendant 175: watchesbrand.net  
Defendant 176: watchvipshop.com  
Defendant 177: wbrandbags.com  
Defendant 178: webbags.org  
Defendant 179: westoffer.com  
Defendant 180: wowyahoo.com  
Defendant 181: wsreplicas.com  
Defendant 182: yeahlvwallets.com