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 16 *(Pro Hac Vice to be Submitted)*

14 Attorneys for Plaintiffs, NIKE, Inc. and Converse, Inc.

15 **UNITED STATES DISTRICT COURT**
 16 **DISTRICT OF NEVADA**

18 NIKE, INC.)
 19 and)
 20 CONVERSE, INC.,)
 21 Plaintiffs,)
 22 vs.)
 23 QILOO INTERNATIONAL LIMITED)
 24 Defendant.

**PLAINTIFFS' EMERGENCY
 MOTION FOR A TEMPORARY
 RESTRAINING ORDER
 WITHOUT NOTICE AND A
 PRELIMINARY INJUNCTION**

25 **DECLARATION OF THOMAS SCAVUZZO**

26 I, Thomas Scavuzzo, declare under penalty of perjury pursuant to the laws of the United
 27 States and the State of Nevada that the following is true:

28 1. I am a paralegal in the intellectual property group of Lewis and Roca LLP, in Las

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1 Vegas, Nevada. I have been a paralegal at Lewis and Roca since 2007.

2 2. On February 6, 2012, at Plaintiffs' request, I visited the 2012 World Shoe
3 Association ("WSA") trade show at the Sands Convention Center in Las Vegas to investigate and
4 identify footwear models suspected of infringing Plaintiffs' design patents and registered
5 trademarks.

6 3. Specifically, I visited QiLoo's booth – booth number 12736 – where I inspected
7 numerous shoes that have outsole and upper designs that look like the outsole and upper designs
8 of Converse's Chuck Taylor All Star shoes, including the designs depicted in Converse's
9 Trademark Registration Numbers: 1,588,960; 3,258,103; 4,062,112; and 4,065,482.

10 5. I have no expertise in design patents or trademarks relating to shoes and my
11 opinion regarding the similarity of the design of the accused products to Converse's trademarks is
12 based on my inspection of the accused products.

13 Executed this 6th day of February, 2012.

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15 _____
16 Thomas Scavuzzo

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