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5 Attorneys for Plaintiff Las Vegas Sands Corp.

6 **UNITED STATES DISTRICT COURT**
 7 **DISTRICT OF NEVADA**

8 LAS VEGAS SANDS CORP., a Nevada
 9 corporation,

10 Plaintiff,

11 v.

12 FIRST CAGAYAN LEISURE & RESORT
 CORPORATION, a foreign corporation, WANN
 YICHEN, an individual, QING WAN LENG, an
 13 individual, and UNKNOWN REGISTRANTS
 OF WWW.358.COM, WWW.359.COM,
 14 WWW.JS2255.COM, WWW.JS2299.COM,
 WWW.JS33333.COM, JS55555.COM,
 15 WWW.JINSHA.COM, WWW.1133JS.COM,
 WWW.1166JS.COM, WWW.1177JS.COM,
 16 WWW.1188JS.COM, WWW.1199JS.COM,
 WWW.JS3111.COM, WWW.JS3777.COM,
 17 WWW.JS3222.COM, WWW.5599JS.COM,
 WWW.5588JS.COM, WWW.JS8777.COM,
 18 WWW.6677JS.COM, WWW.6633JS.COM,
 WWW.6644JS.COM, WWW.6611JS.COM,
 19 WWW.6666JS.COM, WWW.6688JS.COM,
 WWW.7777JS.COM, WWW.1111JS.COM,
 20 WWW.2222JS.COM, WWW.3333JS.COM,
 WWW.5555JS.COM, WWW.8888JS.COM,
 21 WWW.JS8111.COM, WWW.JS8222.COM,
 WWW.8877JS.COM, WWW.8833JS.COM,
 22 WWW.8811JS.COM, WWW.8822JS.COM,
 WWW.8844JS.COM, WWW.8855JS.COM,
 23 WWW.2211JS.COM, WWW.2255JS.COM,
 WWW.2266JS.COM, WWW.2277JS.COM,
 24 WWW.2288JS.COM, WWW.2299JS.COM,
 WWW.1122JS.COM, WWW.1155JS.COM,
 25 WWW.1144JS.COM, WWW.3311JS.COM,
 WWW.3322JS.COM, WWW.3355JS.COM,
 26 WWW.3377JS.COM, WWW.3388JS.COM,
 WWW.3399JS.COM, and WWW.3583.COM

27 Defendants.
28

Case No: 2:14-cv-00424-JCM-NJK

**PLAINTIFF’S EX PARTE MOTION
 FOR TEMPORARY RESTRAINING
 ORDER, ALTERNATIVE SERVICE,
 AND PRELIMINARY INJUNCTION
 FOR THE NEW DEFENDANTS**

1 Plaintiff Las Vegas Sands Corp. (“Plaintiff” and/or “Las Vegas Sands Corp.”)
2 respectfully moves the Court for a temporary restraining order without notice, a preliminary
3 injunction with notice, and for permission to serve the New Defendants (defined below) by
4 email.

5 **PRELIMINARY STATEMENT**

6 Las Vegas Sands Corp. brought this action against the known and unknown registrants of
7 numerous Internet domain names who are using Las Vegas Sands Corp.’s famous “Sands”
8 trademark, Sunburst design, and “Jinsha” characters (the Chinese equivalent of the “Sands”
9 trademark) on dozens of websites to lure prospective gamblers to overseas online casinos that
10 pretend to be affiliated with, operated by, or approved of by Las Vegas Sands Corp. but in fact,
11 have absolutely no connection to Las Vegas Sands Corp. whatsoever.

12 Las Vegas Sands Corp. originally brought this action against the registrants of twenty six
13 Internet domains that infringe Plaintiff’s trademarks (the “Original Defendants”). Las Vegas
14 Sands Corp. obtained a temporary restraining order and a preliminary injunction against these
15 domains, disabling them and placing them on lock and hold. (Dkt. Nos. 9 and 16.) Recently,
16 however, Las Vegas Sands Corp. has discovered numerous new domains operating the same
17 online casino (the “New Domains”). Las Vegas Sands Corp. has amended its complaint to add
18 the unknown registrants of the New Domains as defendants (the “New Defendants”). However,
19 as explained more fully below, it is near certain that the Original Defendants and the New
20 Defendants are the same people.

21 By and through this motion, pursuant to Rule 65 of the Federal Rules of Civil Procedure,
22 Las Vegas Sands Corp. seeks the entry of a temporary restraining order and a preliminary
23 injunction:

24 A. Granting Plaintiff leave to serve subpoenas upon eNom, Inc, GoDaddy.com, Inc,
25 or any other entity for the purpose of identifying the presently unknown registrants of the New
26 Domains;

27 B. Granting Plaintiff permission to serve the Summons, Complaint, First Amended
28 Complaint, and all other papers upon the presently unknown registrants of the New Domains by

1 email to the registrant email address currently listed in the WHOIS database for each domain or
2 to the email address provided by each such registrant to the domain name registrar in connection
3 with the registration of the domain names;

4 C. Temporarily and preliminarily prohibiting the New Defendants and their
5 respective officers, agents, servants, employees, and/or all other persons acting in concert or
6 participation with the New Defendants, from: (1) using the SANDS mark, the Sunburst design,
7 Jinsha, or any confusingly similar variations thereof, alone or in combination with any other
8 letters, words, letter string, phrases or designs in commerce, including, without limitation, on any
9 website, in any domain name, in any social network user name, in any hidden website text, or in
10 any website metatag; and (2) engaging in false or misleading advertising or commercial activities
11 likely to deceive consumers into believing that any of the New Defendant is the Plaintiff or that
12 any of the New Defendants' goods or services are associated or affiliated with, connected to,
13 approved, or sponsored by, the Plaintiff;

14 G. Temporarily and preliminarily requiring domain name registrars eNom, Inc., and
15 GoDaddy.com, Inc., and/or VeriSign, Inc. (the .com domain name registry) to immediately
16 remove or disable the current domain name server information for the New Domains and place
17 them on hold and lock pending further order of the Court;

18 H. Finding that Las Vegas Sands Corp.'s prior deposit of \$100 with the Clerk of the
19 Court is sufficient security for this temporary restraining order and preliminary injunction;

20 I. Setting a hearing on Las Vegas Sands Corp.'s motion for preliminary injunction
21 against the New Defendants;

22 J. Setting a deadline for the New Defendants to file and serve their opposition to Las
23 Vegas Sands Corp.'s motion for preliminary injunction; and

24 K. Setting a deadline for Las Vegas Sands Corp. to file and serve its reply
25 memorandum in support of its motion for preliminary injunction.

26 Las Vegas Sands Corp. seeks *ex parte* relief without notice because, if notice is given,
27 there is a substantial risk that the New Defendants (whose identities are presently unknown but
28 who are presumably located in China) will transfer the registrations for the New Domains to a

1 registrar or registrant located outside of the Court’s jurisdiction in an effort to frustrate Las
2 Vegas Sands Corp.’s ability to obtain relief from this Court. Las Vegas Sands Corp. would
3 potentially be required to file a succession of lawsuits in jurisdictions throughout the world as the
4 New Defendants transfer the New Domains from one foreign registrar to another.

5 This motion is based on the following memorandum of points and authorities, the
6 accompanying Declaration of Meng Zhong (the “Zhong Decl.”), the pleadings and other papers
7 on file in this case, and any oral argument the Court may require or allow.

8 **STATEMENT OF RELEVANT FACTS**

9 Plaintiff filed the Complaint on March 20, 2014. (Dkt. No. 1.) On the same date Plaintiff
10 filed an *Ex Parte* Motion for a Temporary Restraining Order, Alternative Service, and
11 Preliminary Injunction. (Dkt. Nos. 2 & 3.)

12 On March 21, 2014, the Court entered its Temporary Restraining Order, Order for
13 Alternative Service, and Order Setting Hearing and Briefing Schedule On Plaintiff’s Motion for
14 Preliminary Injunction. (Dkt. No. 9.) The Court ordered that the Plaintiff could serve the
15 Summons, Complaint, and all other papers upon the Original Defendants by email to the email
16 addresses listed in the WHOIS database for each domain or the email address provided by each
17 registrant to its respective domain name registrar. (Dkt. No. 9.) In accordance with the Court’s
18 order, Plaintiff served each of the Original Defendants by email on March 25, 2014. (Dkt. No.
19 12.)

20 Despite being served, none of the Original Defendants ever appeared in this action.

21 On April 4, 2014, the Court entered an unopposed preliminary injunction against the
22 Original Defendants, which among other things, removed or disabled the domain name server
23 information for the infringing domain names and put the domain names on lock and hold. (Dkt.
24 No. 16.) It also prohibited the Original Defendants from using the SANDS mark, the Sunburst
25 design, or the “Jinsha” characters. (*Id.*) The preliminary injunction order was served on the
26 Original Defendants by email. (Dkt. No. 18.)

27 Recently, however, Plaintiff has discovered additional domain names that operate the
28 ***same online casino that was temporarily and preliminarily enjoined by the Court.***

1 To illustrate, below is a screenshot of the infringing online casino website, taken from the
2 original Complaint (Dkt. No. 1):



14
15 The following screenshot is from one of the New Domains, www.1155js.com:



1 (Zhong Decl. ¶ 5 & Ex. A.) All of the New Domains contain the same infringing content
2 identified above. (Zhong Decl. ¶¶ 4-5.) As the Court can see, other than the fact that the
3 photograph of Plaintiff’s resort is enlarged, the home pages are identical. Just like the domain
4 names originally enjoined by the Court, these New Domains also use a “directory site” that links
5 to all of the various domains that operate the online casino. (Zhong Decl. ¶ 6 & Ex. B.)

6 Upon information and belief, the Original Defendants received notice that their infringing
7 websites were being disabled as a result of the Court’s preliminary injunction. Rather than
8 appear and defend against the action, it appears that the Original Defendants decided to
9 circumvent the Court’s order by creating the New Domains and linking them to the same online
10 casino.

11 **LEGAL ARGUMENTS**

12 This Court already issued a temporary restraining order, order for alternative service, and
13 preliminary injunction with respect to the Original Defendants and the Original Domains (Dkt.
14 Nos. 9 and 16). Given that the New Domains display the same infringing content, the reasons
15 articulated in Plaintiff’s prior motions support Plaintiff’s request here for a temporarily
16 restraining order, an order for alternative service, and a preliminary injunction. Rather than
17 repeat those points and authorities again, Plaintiff incorporates the arguments set forth in its *Ex*
18 *Parte* Motion for Temporary Restraining Order, Alternative Service, and Preliminary Injunction
19 (Dkt. Nos. 2 and 3.)

20 In fact, given that the New Defendants are most certainly the same persons as the
21 Original Defendants, there is even more reason for immediate and *ex parte* relief as the
22 continued use of the infringing web site in connection with the New Domains shows a blatant
23 disregard for the Court’s orders, and a continual willingness on the Defendants’ part to do
24 anything to prevent Plaintiff from obtaining effective relief.

25 **CONCLUSION**

26 For the reasons set forth above, Plaintiff respectfully requests that the Court issue a
27 temporary restraining order, an order permitting alternative service and an order setting a
28 briefing schedule for Plaintiff’s motion for preliminary injunction. A proposed order is attached

1 hereto.

2 Dated: this ____th day of December, 2014.

3 Respectfully submitted,

4 LEWIS ROCA ROTHGERBER LLP

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6 By: /s/ Jonathan W. Fountain

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11 Las Vegas Sands Corp.

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7 **DISTRICT OF NEVADA**

8 Case No. 2:14-cv-00424-JCM-NJK

9 LAS VEGAS SANDS CORP., a Nevada
corporation,

10 Plaintiff,

DECLARATION OF MENG ZHONG

11 v.

12 FIRST CAGAYAN LEISURE & RESORT
CORPORATION, a foreign corporation, WANN
YICHEN, an individual, QING WAN LENG, an
13 individual, and UNKNOWN REGISTRANTS
OF WWW.358.COM, WWW.359.COM,
14 WWW.JS2255.COM, WWW.JS2299.COM,
WWW.JS33333.COM, JS55555.COM,
15 WWW.JINSHA.COM, WWW.1133JS.COM,
WWW.1166JS.COM, WWW.1177JS.COM,
16 WWW.1188JS.COM, WWW.1199JS.COM,
WWW.JS3111.COM, WWW.JS3777.COM,
17 WWW.JS3222.COM, WWW.5599JS.COM,
WWW.5588JS.COM, WWW.JS8777.COM,
18 WWW.6677JS.COM, WWW.6633JS.COM,
WWW.6644JS.COM, WWW.6611JS.COM,
19 WWW.6666JS.COM, WWW.6688JS.COM,
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WWW.5555JS.COM, WWW.8888JS.COM,
21 WWW.JS8111.COM, WWW.JS8222.COM,
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22 WWW.8811JS.COM, WWW.8822JS.COM,
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24 WWW.2288JS.COM, WWW.2299JS.COM,
WWW.1122JS.COM, WWW.1155JS.COM,
25 WWW.1144JS.COM, WWW.3311JS.COM,
WWW.3322JS.COM, WWW.3355JS.COM,
26 WWW.3377JS.COM, WWW.3388JS.COM,
WWW.3399JS.COM, AND WWW.3583.COM

27 Defendants.
28

1 I, Meng Zhong, declare under penalty of perjury under the laws of the United States, that
2 the following is true and correct:

3 1. I am competent to testify and have personal knowledge of the facts set forth
4 below, except for those facts expressly stated upon information and belief. With respect to any
5 fact expressly stated on information and belief, I believe such fact to be true.

6 2. I am an attorney licensed to practice law in the State of Nevada. I am employed
7 by Lewis Roca Rothgerber LLP, counsel for Plaintiff Las Vegas Sand Corp.

8 3. Between November 3, 2014 to the filing of this declaration, I viewed the
9 webpages located at the following domain names, conducted an investigation to identify the
10 registered owners of the domain names and, if possible, attempted to determine who is operating
11 the website located at the following domain names: www.js3111.com, www.js3777.com,
12 www.js3222.com, www.5599js.com, www.5588js.com, www.js8777.com, www.6677js.com,
13 www.6633js.com, www.6644js.com, www.6611js.com, www.6666js.com, www.6688js.com,
14 www.7777js.com, www.1111js.com, www.2222js.com, www.3333js.com, www.5555js.com,
15 www.8888js.com, www.js8111.com, www.js8222.com, www.8877js.com, www.8833js.com,
16 www.8811js.com, www.8822js.com, www.8844js.com, www.8855js.com, www.2211js.com,
17 www.2255js.com, www.2266js.com, www.2277js.com, www.2288js.com, www.2299js.com,
18 www.1122js.com, www.1155js.com, www.1144js.com, www.3311js.com, www.3322js.com,
19 www.3355js.com, www.3377js.com, www.3388js.com, www.3399js.com, and www.3583.com
20 (collectively, "New Domains").

21 4. As I discovered, every single one of the webpages located at each of the New
22 Domains is identical or nearly identical to the webpages that this Court ordered disabled and put
23 on lock and hold in its preliminary injunction order. (*See* Dkt. Nos. 6 & 16.) The only
24 difference appears to be an enlarged photograph of Plaintiff's resort.

25 5. In other words, the webpages associated with the New Domains are identical to
26 the webpages associated with the domains the Court has already temporarily and preliminarily
27 enjoined because they infringe upon Plaintiff's federally registered trademarks. True and
28 accurate screenshots from two of the webpages associated with two of the New Domains

1 (www.js3777.com and www.1155js.com) are attached hereto as Exhibit A to illustrate this point.
2 Upon information and belief, the New Domains are operated by the same Defendants that
3 operated the domains Plaintiff originally identified when it first filed its Complaint.

4 6. Like the domain names the Court previously enjoined, the New Domains are
5 linked through and accessible through a “directory site” located at www.3583.com. A true and
6 accurate screenshot of this directory site is attached hereto as Exhibit B.

7 7. In addition to the foregoing, I also conducted an investigation to determine the
8 identity of the registrant(s) of the New Domains. To do so, I obtained search results on the
9 publicly available WHOIS database, using the WHOIS search function available at register.com
10 (the domain name registrar for the New Domains).

11 8. I could not determine the identity of the registrant(s) of the New Domains because
12 the registrant identification information provided by the registrants appears to be fabricated. For
13 example, the registrant identification information for the www.3583.com domain indicates that
14 the registrant’s name is “zhang junliang” but states that this person lives on street
15 “fdshfdvfdsgrew” in city “ittrgegrth” in India. Clearly, this information is false as no such street
16 or city exists. The registrant email address was provided as ktrvrref@gmail.com, however,
17 based upon my experience and judgment prosecuting cybersquatting actions, I believe that this
18 email is highly likely to just be a “dummy” account.

19 8. The registrant identification information for the other New Domains is similarly
20 unhelpful.

21 9. Given the above, including the fact that Defendants are attempting to circumvent
22 the court’s prior orders, the Defendants’ failure to appear in this case to defend their actions
23 despite being provided notice of the suit, and the clearly fake and dummy accounts Defendants
24 have set up to register and operate the New Domains, I believe *ex parte* relief is warranted.
25 Without *ex parte* relief, there is good reason to believe that Defendants, whoever they are, will
26 actively try to circumvent this Court’s orders and prevent effective relief from being afforded to
27 Plaintiff, including possibly transferring the domain names to other domain name registrars
28 located outside of the United States and outside the jurisdiction of the Court who are unlikely to

1 act upon any order requiring that the New Domains be disabled or placed on hold and lock
2 pending trial in this action.

3 DATED this 18th day of December, 2014.

4 /s/ Meng Zhong
5 **MENG ZHONG**

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Exhibit A

Exhibit A

金沙 Sands 娛樂場

立即注册 在线客服

帐号 密码 验证码 2021 登录 免费试玩 忘记密码

返回首页 | 幸运彩票 | 真人荷官 | 皇冠體育 | BBIN娛樂城 | MG娛樂城 | GS老虎機 | 優惠活動 | 代理加盟

产品服务 全球最好，最丰富的产品

银行服务 24小时在线存款/五分钟到账 银行转账/网银支付

值得信赖 政府颁发的执照，良好的口碑

V.9 V.5 V.12 V.10 1024x768

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Firefox | 金沙娱乐场--老品牌值得您信赖 | + | www.1155js.com | Google

金沙 Sands 娛樂場

立即注册 | 在线客服

帐号 | 密码 | 验证码 0030 | 登录 | 免费注册 | 忘记密码

返回首页 | 幸运彩票 | 真人荷官 | 皇冠體育 | BBIN娛樂城 | MG娛樂城 | GS老虎機 | 優惠活動 | 代理加盟



产品服务 全球最好, 最丰富的产品

银行服务 24小时在线存款/五分钟到账 银行转账/网银支付

值得信赖 政府颁发的执照, 良好的口碑

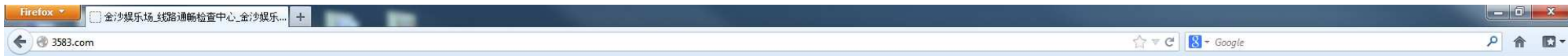
V.9 | V.5 | V.12 | V.10 | 1024x768

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关于我们 | 责任博彩 | 隐私政策 | 条款与规则 | 声明 | 合作伙伴 | GT官方信箱 | 清理浏览器缓存

Exhibit B

Exhibit B



网址1: 访问速度80ms =>	http://www.js3777.com	=>	点击进入
网址2: 访问速度90ms =>	http://www.5599js.com	=>	点击进入
网址3: 访问速度90ms =>	http://www.5588js.com	=>	点击进入
网址4: 访问速度90ms =>	http://www.js3222.com	=>	点击进入
网址5: 访问速度90ms =>	http://www.js3111.com	=>	点击进入

再次检测刷新

温馨提示:ms数值越小 越靠前的网址,打开速度就越快
如果我们的检测中心对您有帮助,请按 **Ctrl+D** 收藏

您的IP: 如果检测后还不能登录请按以下操作方式
操作步骤: 打开IE浏览器, 选择: 工具->Internet选项->在选择 (删除历史浏览记录)->删除->重启IE
如果您是出现视频卡, 请在您的游戏页面右下角点击“摄像头”的小图标, 选择一个新线路使用看看!



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7 **DISTRICT OF NEVADA**

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13 YICHEN, an individual, QING WAN LENG, an
individual, and UNKNOWN REGISTRANTS
14 OF WWW.358.COM, WWW.359.COM,
WWW.JS2255.COM, WWW.JS2299.COM,
WWW.JS33333.COM, JS55555.COM,
15 WWW.JINSHA.COM, WWW.1133JS.COM,
WWW.1166JS.COM, WWW.1177JS.COM,
16 WWW.1188JS.COM, WWW.1199JS.COM,
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22 WWW.8811JS.COM, WWW.8822JS.COM,
WWW.8844JS.COM, WWW.8855JS.COM,
23 WWW.2211JS.COM, WWW.2255JS.COM,
WWW.2266JS.COM, WWW.2277JS.COM,
24 WWW.2288JS.COM, WWW.2299JS.COM,
WWW.1122JS.COM, WWW.1155JS.COM,
25 WWW.1144JS.COM, WWW.3311JS.COM,
WWW.3322JS.COM, WWW.3355JS.COM,
26 WWW.3377JS.COM, WWW.3388JS.COM,
WWW.3399JS.COM, AND WWW.3583.COM

27 Defendants.
28

Case No. 2:14-cv-00424-JCM-NJK

**TEMPORARY RESTRAINING ORDER,
ORDER FOR ALTERNATIVE SERVICE
AND ORDER SETTING BRIEFING
SCHEDULE ON PLAINTIFF'S MOTION
FOR PRELIMINARY INJUNCTION**

1 **UPON CONSIDERATION** of the motion filed by Plaintiff Las Vegas Sands Corp. for
2 an *ex parte* temporary restraining order, for alternative service, and for a preliminary injunction
3 against the New Defendants, the supporting memorandum of points and authorities, the
4 supporting declaration of Meng Zhong, the record in this case, and for other good cause shown;

5 **THE COURT HEREBY FINDS THAT:**

6 1. Las Vegas Sands Corp. will suffer irreparable injury to its valuable trademarks
7 and associated goodwill if the New Defendants are not temporarily enjoined and restrained from
8 transferring the following domain names to other domain name registrars located outside the
9 Court's jurisdiction, or from transferring the registrations for the following domain names to
10 other persons or entities located outside the Court's jurisdiction: www.js3111.com,
11 www.js3777.com, www.js3222.com, www.5599js.com, www.5588js.com, www.js8777.com,
12 www.6677js.com, www.6633js.com, www.6644js.com, www.6611js.com, www.6666js.com,
13 www.6688js.com, www.7777js.com, www.1111js.com, www.2222js.com, www.3333js.com,
14 www.5555js.com, www.8888js.com, www.js8111.com, www.js8222.com, www.8877js.com,
15 www.8833js.com, www.8811js.com, www.8822js.com, www.8844js.com, www.8855js.com,
16 www.2211js.com, www.2255js.com, www.2266js.com, www.2277js.com, www.2288js.com,
17 www.2299js.com, www.1122js.com, www.1155js.com, www.1144js.com, www.3311js.com,
18 www.3322js.com, www.3355js.com, www.3377js.com, www.3388js.com, www.3399js.com,
19 and www.3583.com (together the "New Domains");

20 2. Las Vegas Sands Corp. is likely to succeed on the merits of its Lanham Act
21 claims for trademark infringement and false designation of origin, brought pursuant to 15 U.S.C.
22 §§ 1114(a) and 1125(a)(1)(A), respectively, and on its claim for copyright infringement, brought
23 pursuant to 17 U.S.C. § 101, *et seq.*;

24 3. The balance of hardships tips in Las Vegas Sands Corp.'s favor because a
25 temporary restraining order would merely place the New Domains on hold and lock pending
26 trial, and the failure to issue a temporary restraining order would cause Las Vegas Sands Corp. to
27 suffer additional irreparable injury and incur additional expense if the New Domains are
28 transferred to other registrants during the pendency of this action, requiring Las Vegas Sands

1 Corp. to file additional lawsuit(s) in other jurisdictions;

2 4. The issuance of a temporary restraining order is in the public interest because it
3 would protect consumers against deception and confusion arising from the use of Las Vegas
4 Sands Corp.'s federally registered trademarks, by persons other than Las Vegas Sands Corp.; and

5 5. The New Defendants will suffer minimal damage, if any damage at all, by the
6 issuance of a temporary restraining order; accordingly, a nominal bond in the amount of \$100 is
7 reasonable security.

8 **THEREFORE, IT IS HEREBY ORDERED THAT**, pending a full trial on the merits:

9 1. eNom, Inc. ("eNom") and GoDaddy.com, Inc. (the domain name registrars) and
10 VeriSign, Inc. (the.com registry) shall immediately remove or disable the domain name server
11 ("DNS") information for the New Domains, shall place the New Domains on hold and lock, and
12 deposit them into the registry of the Court; and

13 2. The New Defendants and their respective officers, agents, servants, employees,
14 and/or all other persons acting in concert or participation with the New Defendants are hereby
15 temporarily restrained and enjoined from: (a) using the SANDS mark, the Sunburst design,
16 Jinsha, or any confusingly similar variations thereof, alone or in combination with any other
17 letters, words, letter string, phrases or designs in commerce, including, without limitation, on any
18 website, in any domain name, in any social network user name, in any hidden website text, or in
19 any website metatag; and (b) engaging in false or misleading advertising or commercial activities
20 likely to deceive consumers into believing that any of the New Defendants is the Plaintiff or that
21 any of the New Defendants' goods or services are associated or affiliated with, connected to, or
22 approved, or sponsored by, the Plaintiff.

23 **IT IS HEREBY FURTHER ORDERED THAT:**

24 1. Las Vegas Sands Corp. need not post additional security because it has already
25 deposited \$100 with the Clerk of the Court as security for the Court's previously issued
26 temporary restraining order (Dkt. No. 10), and that deposit is sufficient security to support the
27 issuance of this temporary restraining order;

28 2. Plaintiff may serve subpoenas upon eNom, Inc., GoDaddy.com, Inc., or any other

1 entity for the purpose of identifying the presently unknown registrants of the New Domains;

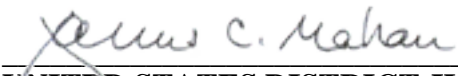
2 3. Plaintiff may serve the Summons, Complaint, First Amended Complaint, and all
3 other papers upon the presently unknown registrants of the New Domains by email to the
4 registrant email address currently listed in the WHOIS database for each of the New Domains;

5 4. The parties shall appear for hearing and oral argument on Las Vegas Sands
6 Corp.'s motion for preliminary injunction on January 2, 2015, at 10:00 a.m. in
7 Courtroom 6A, at the Lloyd D. George Federal Courthouse, 333 South Las Vegas
8 Boulevard, Las Vegas, Nevada;

9 5. The New Defendants shall each file and serve their briefs opposing Las Vegas
10 Sands Corp.'s motion for preliminary injunction, if any, no later than December 26, 2014;
11 and

12 6. Las Vegas Sands Corp. shall file and serve its reply brief in support of its motion
13 for preliminary injunction no later than December 30, 2014.

14 ENTERED: December 19, 2014, at 10:30 a.m.

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17 UNITED STATES DISTRICT JUDGE

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