

2. I submit this declaration in support of Plaintiffs' Application for a Preliminary Injunction against Defendants Yves Saint Laurent America, Inc., Yves Saint Laurent America Holding, Inc. and Yves Saint Laurent S.A.S. (collectively, "Defendants"). More particularly, I submit this declaration to evidence the extensive brand monitoring and enforcement activities undertaken by SIPI on behalf of Plaintiffs with respect to online auction sites.

3. As part of my responsibilities, I oversee daily monitoring activities of nine (9) auction websites (eBay, iOffer, Oztion, Dhgate, Yahoo-Taiwan, Taobao, Tradetang and Beltal) for auction listings which infringe the Red Sole Mark. I also oversee the production and filing of daily takedown notifications to each of the auction websites as well as the production and sending of all correspondence relating thereto. Finally, I oversee all day-to-day and monthly reporting/analysis of SIPI's activities to Plaintiffs. If requested I can testify to the facts contained in this Declaration based upon my own knowledge and/or upon files which are kept by our company under my direction and control.

4. From August 2009 through June 2011, SIPI has reviewed approximately 470,000 flagged auction listings (that is, those auctions identified as offering shoes with the Louboutin Red Sole Mark) across all of the monitored websites (approximately 20,000 listings per month or 680 listings per day). As a result of these monitoring efforts, SIPI filed with a near perfect rate of success takedown notification for a total of 327,246 auction listings (approximately 14,000 listings per month or 475 listings per day). All of these were for listings of shoes bearing the Red Sole Mark, some of which also were identified as Louboutin (albeit fake) and some of which were not. A more detailed breakdown of SIPI's monitoring and enforcement activities is provided in Table 1, attached as Exhibit A, hereto.

5. SIPI continues these take down efforts on a daily basis as of the date of this Declaration.

I declare under penalties of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 18th Monday of July, 2011 in New Delhi, India,




Sharad Misra