

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

FILED

2011 SEP 23 P 12:07

CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

Civil Case No. 1:11cv 1028

LDG/TCB

Deckers Outdoor Corporation,)
)
 Plaintiff,)
)
 v.)
)
 2011cheapuggs.com, 2011ugggoutlet.com,)
 66ugg.com, 88ugg.com, achatuggbottes.com,)
 acheteruggsboot.com, allcoloruggs.com,)
 alluggbootsclearance.com,)
 ankaufenuggboots.com, askuggboots.com,)
 auggbootstore.com, australians-ugg.com,)
 australianuggboots-usa.com,)
 australiauggshoes.com, ausuggshop.com,)
 authenticuggbootshop.com, authentic-uggs-)
 boots.com, au-uggboots.net, au-)
 uggbootsclearance.com, auuggs.com,)
 babyuggbootsuk.com, baileybootsuk.com,)
 bailey-button-bomber-uggs.com, bailey-)
 button-bomber-uggs.org,)
 baileybuttonuggbootsuk.com,)
 baileybuttonuggs.net, bailey-button-uggs-)
 uk.com, baileybuttonugguk.com, bayugg.com,)
 bestfourugg.com, bestpriceuggs.com, best-)
 ugg.org, bestuggboots.org, bestuggsboots.com,)
 bestuggsonsale.com, best-uggs-outlet.com,)
 bestuggwear.com, black-bailey-button-ugg-)
 boots.org, black-bailey-button-uggs.org, black-)
 cardy-ugg-boots.org, black-cardy-uggs.org,)
 blackugg-boots.com, blackuggboots.org,)
 blackuggbootsuk.net, blackuggs.org,)
 blueuggboots.org, blueuggbootsau.com,)
 blueuggboots-au.com, boots-uggboots.com,)
 bootsuggcheapsale.com,)
 bootsuggsaustralia.com,)
 bootsuggsaustralia.net, bootsuggsca.com,)
 bootsuggstore.com, bootuggsca.com,)
 bootuggscanada.com, bootuggssale.com,)
 bootuggssale.net, botasugg.org,)
 botasuggenmadrid.net, bottes-uggs.net, boys-)
 uggboots.com, brown-bailey-button-uggs.org,)
 buttonugg.com, buy4cheapugg.com,)
 buycheapuggsboot.com,)
 buyuggboots2011.com, buyuggbootsau.com,)
 buyuggboots-au.com, buyuggbootsonline.com,)
 buy-uggsboots-onlineuk.com,)
 buyuggshoe.com, canadaugg.com, canada-)
 uggboots.com, canadauggboots.org,)
 canadauggbootss.net, canadauggsboot.net,)
 cardyuggs.net, cheap2uggboots.com,)
 cheapbootsugg.net, cheapest-ugg-boots.com,)
 cheapforuggs.org, cheapkidsuggs-uk.com,)
)

cheaponuggs.com, cheapugg.cc, cheap-)
ugg.com, cheap-ugg-australia.com,)
cheapuggboots1.com, cheapuggboots-ca.com,)
cheapuggboots-canada.com, cheapuggboots-)
ie.com, cheapuggboots-ireland.com,)
cheapuggbootsireland.net, cheap-ugg-boots-)
onsale.com, cheap-uggbootsonsale.org, cheap-)
uggbootssale.net, cheap-uggbootssaleuk.com,)
cheapuggbootsstore.org,)
cheapuggbootstores.com,)
cheapuggbootsuggs.com, cheapugg-)
bootsuk1.com, cheapuggcanada.net, cheap-)
uggcanada.net, cheapuggcardyboots.com,)
cheap-uggclassicboots.com,)
cheapuggdiscount.com, cheapuggjboots.com,)
cheap-ugg-outlet.com, cheapuggs2011.com,)
cheapuggs4uk.com, cheapuggsalestore.com,)
cheap-uggsaustralia.com,)
cheapuggsbootonlines.com, cheap-)
uggsboots.net, cheapuggsboots-ca.com,)
cheapuggsbootscanada.com, cheap-uggs-boots-)
forsale.com, cheap-uggs-boots-forsale-uk.com,)
cheap-uggs-boots-online.com, cheap-uggs-)
boots-onsale.com, cheap-uggs-boots-)
saleuk.com, cheap-uggs-bootss-onsale.com,)
cheap-uggs-boots-us.com,)
cheapuggsbootuk.com, cheapuggscanada.net,)
cheapuggsoutlet-uk.com, cheap-uggs-shoes-)
sale.com, cheapuggsstoreuk.com,)
cheapwomenuggs.com, chestnutuggboots.com,)
childrens-uggs-boots-uk.com,)
childrenuggbootstore.com, chinauggs.com,)
chocolateuggboots.com, classicshortuggs-)
uk.com, classicalluggsboots-uk.com,)
classicuggs.org, classicuggsbootsuk.com,)
clearanceuggbootsus.com, comprarugg.net,)
discount4uggboots.com,)
discountcheapugg.com, discounted-uggs-)
uk.com, discount-ugg.com, discountugg-)
boots.net, discountuggbootssaleonline.com,)
discountuggoutlets.com,)
discountuggsales.com,)
discountuggsbootonline.com, discount-uggs-)
boots.org, discountuggsbootssale.com,)
discountuggsoutlet.org, discount-uggs-us.com,)
dropshipugg.com, easyuggshop.com,)
ecuggboot.com, emuuggs-au.com, enjoy-)
uggboots.com, e-uggbootssaleuk.com,)
euggstore.com, fancyuggsale.com,)
fashionugg.org, fashionuggbootsca.com,)
fashionuggsoutlet.com, freeuggsell.com,)
genuine-uggboots.net,)
genuineuggboots4u.com, getuggboots.us, girls-)
ugg-boots.com, giveugg.com, global-ugg.com,)

godloverugg.com, goodugg.net,)
gooduggboots.net, gotobuyugg.com,)
gotouggstore.com, go-uggboots.com,)
gouggs.com, guenstiguggboots.com,)
happyuggonline.com, hereuggboots.com,)
heyugg.com, highugg.com, hiugg-boots.com,)
hiuggsoutlet.com, hot-pink-uggs-boots-)
uk.com, hotsale-uggboots.com,)
hotuggbootsclearance.com, iclassicugg.com,)
irelanduggsbootssale.com,)
irelanduggsbootssale.net,)
jimmychoouggboot.com, justuggboot.com,)
kids-uggs.com, kids-uggs-boots-cheap-uk.com,)
knock-off-uggs.com, kopenuggboots.com,)
laarzen-ugg.com, ladies-ugg.com, ladyugg.us,)
leatherugg.com, liliugg.com, linkuggs.com,)
loveinuggboots.com, loveuggsboots.com,)
luxuryuggsbootsoutlets.net, maleuggboots-)
uk.com, mall-uggsboots.com,)
manuggboots.com, mensuggs-boots.com,)
mens-uggs-boots-uk.org, metallic-uggs.com,)
mini-uggs-boots-uk.com, mybestuggs.com,)
myuggbootsoutlet.com, myuggbootsus.com,)
myuggbootszone.com, myuggs.org,)
myuggseller.com, navyuggs.com,)
nederlanduggs.com, netbuyugg.com,)
netherlandsuggboots.com,)
newuggbootssale.com, newuggboots-sale.com,)
nordstrom-uggs-boots-ca.com, nthuggs.com,)
obuyuggs.com, officialugg.com,)
officialugg.org, onlineshoesugg.com,)
onlineuggbootsale.com,)
onlineuggsbootsale.com, onlycheapugg.com,)
orderuggs.com, originaluggboots-uk.com,)
outletugg.org, outletuggboot.com,)
outletuggs.org, paiugg.com, pick-)
uggboots.com, pink-uggs-boots-uk.com,)
prezzougg.org, purple-ugg-boots.com, purple-)
uggs-boots.com, purple-uggs-boots-uk.com,)
realugg.com, real-ugg-boots.com, real-uggs-)
boots-uk.com, realugguk.com, red-)
uggboots.com, replica-ugg-boots-uk.com,)
sale2uggboots.com, salesuggboot.com,)
salesuggbootsonline.com, sales-uggs-boots.net,)
sale-uggboots.net, saleuggbootsclearance.org,)
saleuggbots.com, saleuggsales.com,)
saleukuggboots.com, sbuggs.com,)
scarpeuggs.org, schoenenugg.com,)
selluggsboots.com, sexyuggs.com,)
shoesuggs.com, shopping-ugg.net,)
shortugg.com, shortuggsale.com,)
silveruggs.com, snowuggshoes.com,)
stiefeluggs.com, stivaliuggs.com,)
sundanceugg.com, superbugg.com,)

switzerlandugg.net, talluggbootsuk.org,)
theaustraliaugg.com, thecheapuggboots.com,)
theuggaustraliaboos.com, theuggbootsale.com,)
theuggbootsmall.com, theuggbootsuk.com,)
thuggaustralia.com, topugg.com,)
topugg4u.com, topuggbootsale.com,)
topuggbootsus.com, tougg.org,)
ugg2baileybutton.com, ugg2sheep.com,)
ugg2you.com, ugg2your.com, ugg-4boots-sale-)
uk.com, ugg4outlet-stores.net, ugg555.com,)
ugg-adirondack-otter.com,)
uggadirondacktallboot.com, uggale.com,)
uggatms.com, uggausesshop.com, uggaustralia-)
au.com, uggaustaliabarcelona.com,)
uggaustraliaboos.org, ugg-australiaboos.us,)
uggaustraliacanada.org, uggaustaliadk.net,)
uggaustraliaespana.org,)
uggaustraliagreece.com,)
uggaustraliaireland.net,)
uggaustralianederland.net,)
uggaustralianorge.org, ugg-australiaoutlet.com,)
uggaustralia-outlet.net,)
uggaustraliaoutletstore.com,)
uggaustraliapascher.com,)
uggaustraliaretail.org, uggaustaliashoes.org,)
uggaustraliasverige.net, uggba.com,)
uggbaileybootsuks.com, uggbailey-button.com,)
ugg-baileybutton1.com, ugg-bailey-button-)
bomber.org, ugg-bailey-button-bomber-)
brown.org, ugg-bailey-button-chestnut.org,)
ugg-bailey-button-fancy.org, ugg-bailey-)
button-leopard.com, uggbaileybuttons.net,)
uggbaileybutton-sale.net, ugg-bailey-button-)
sand.com, ugg-bailey-button-triplet.com,)
uggbaileybuttontriplet.us,)
uggbaileytriplet.com, uggbaratas.com,)
uggbest.org, uggbestsale.com, uggboots.com,)
uggbootau.com, uggbootbar.com,)
uggbootbestshop.com, uggbootcanada.com,)
uggbootcardy.com, uggbootery.com,)
uggbootop.com, ugg-boots1.com,)
uggboots2012.com, uggboots2cheap.com, ugg-)
boots4-sale-uk.net, uggboots61.com,)
uggboots86.com, uggboot-sale.net, uggboot-)
sale.org, uggbootsale100.com,)
uggbootsaleshop.com, uggbootsamerica.com,)
uggbootsamerica.net, uggbootsaustralia.org,)
uggbootsaustraliaonsale.com,)
uggbootsaustralia-us.com,)
uggbootsbaileybuttonuk.com,)
uggbootsbestshop.net, uggbootsbestshops.com,)
uggbootsbeststores.net, uggbootsbillig.net,)
uggbootsboutique.com, uggbootsbrisbane.net,)
uggboots-ca.com, uggboots-canada.biz,)

uggboots-canada.net, ugg-bootscanada.net,)
uggboots-canada.org,)
uggbootscanadasale.com,)
uggbootscanadasale.net,)
uggbootscanadasales.com,)
uggbootscheapau.com,)
uggbootsclassiccardy.org,)
uggbootsclearancemore.com,)
uggbootsclearancen.com,)
uggbootsclearanceol.com, uggbootsclearance-)
onsale.com, uggbootsclearanceonsales.com,)
ugg-boots-clearance-sale.com,)
uggbootsdanmark.org, ugg-boots-)
deutschland.net, uggboots-discount.us,)
uggbootsdiscountsell.net,)
uggbootsdiscountuk.com, uggbootses.com,)
uggbootsesale.com, uggbootsfactory.com,)
uggboots-france.com, uggbootsfree.com,)
uggbootsfreeshipping.com, uggboots-)
greece.net, uggbootsgrees.net,)
uggbootsgweets.com, uggbootsguenstig.org,)
ugg-boot-shoes.com, uggbootsshoescheap.org,)
uggbootshongkong.org, uggbootshop.org,)
uggbootshotsalestore.com, uggbootsicon.com,)
uggbootsireland.biz, ugg-bootsireland.com,)
uggbootskom.com, uggbootslady-uk.com,)
uggbootslondon.com, uggbootsmalluk.com,)
uggbootsnederland.org, uggboots-)
nederland.org, uggbootsnewstyle.com,)
uggboots-nz.com, uggbootsofferuk.com, ugg-)
boots-online-nl.com,)
uggbootsonlineshops.com,)
uggbootsonlinestore.net,)
uggbootsonsaleuggs.com, uggboots-on-sale-)
uk.com, uggbootsoutlet1.com,)
uggbootsoutlet2u.net,)
uggbootsoutletaustralia.com, ugg-boots-outlet-)
sale.com, uggbootsoutletssales.com, ugg-)
boots-outlet-store.com,)
uggbootsoutletstores.org,)
uggbootsoutletstores.us, uggbootspeople.com,)
uggbootsperth-au.com, uggbootsquare.com,)
ugg-boots-retailers.com, uggbootssale11.com,)
uggbootssale4s.com, uggbootssaleau.com,)
ugg-boots-sale-canada.com,)
uggbootssalehot.com, uggbootssalehot.net,)
uggbootssale-ie.com,)
uggbootssaleintheuk.com,)
uggbootssaleon.com, uggbootssaleonline.com,)
uggboots-sales.net, uggboots-salesite.com,)
uggbootssalesuk.com, uggbootssaleuk.net,)
ugg-bootssale-uk.org, uggbootssaleuk-uk.com,)
uggbootssale-us.com, ugg-bootssaleus.com,)
uggbootssaleus.us, uggbootssale-usa.org,)

uggbootsscanada.com, uggboots-schweiz.com,)
 ugg-boots-shoes.org, uggbootsshopping-)
 uk.com, ugg-boots-size3.com,)
 uggbootsster.com, uggboots-stores.com,)
 uggbootssuomi.net, uggbootsswitzerland.com,)
 uggbootsswitzerland.net,)
 uggbootsukoutlet.com, ugg-boots-uk-sale.net,)
 uggboots-uksale.org, uggbootsukshops.com,)
 uggbootsup.com, uggbootswatch.com,)
 uggbootswien.org, uggbootswomen.com,)
 uggbootsxaustralia.com, uggbootszuerich.org,)
 uggbootuk.com, uggbootuk.org,)
 uggbootwoman.com, ugg-bots-uk.com,)
 uggbruxelles.com, uggbruxelles.org,)
 uggbuttontriplet.com, uggcanada.net, ugg-)
 canada.net, ugg-cardy.com, ugg-cardy-boots-)
 sale.com, ugg-cardy-boots-sale-uk.com,)
 uggcardybootsuk.com, ugg-cardy-knitted-)
 boot.com, uggcardyretaille.com, uggcardy-)
 sale.com, uggcashop.com, uggcat.com,)
 uggchaussure.org, uggchaussures.net,)
 uggchestnut.com, ugg-chestnut-classic-)
 short.com, ugg-chestnut-classic-tall.com, ugg-)
 china.org, uggchina-nl.com,)
 uggchineseshop.com, uggchocolate.com, ugg-)
 chocolate-classic-tall.com,)
 uggclaasiccardy.com, uggclassic.org,)
 uggclassicboots.org, uggclassiccardy.com, ugg-)
 classiccardy1.com, uggclassiccardyboots.com,)
 ugg-classic-cardy-boots-grey.com, ugg-classic-)
 short-boots-sand.com, ugg-classic-tall1.com,)
 ugg-classic-tall-black-boots.org, ugg-classic-)
 tall-bomber.com, uggclearanceshop.com,)
 uggclubs.com, uggcnshop.com,)
 uggcsizma.com, uggdakota.com, ugg-dakota-)
 chestnut.org, ugg-deal.com,)
 uggdeutschland.com, uggdeutschland.net, ugg-)
 discount-boots.com, uggdiscountbootsuk.com,)
 ugg-discount-outlet.com,)
 uggdiscountstore.com, uggdiscountuk.com,)
 uggdiscountus.com, uggeden.com,)
 uggem.com, ugg-emu.org, uggensuisse.com,)
 uggeoutlet.com, uggeronwalk.com,)
 uggeurope.com, uggevera.com,)
 uggfactorystore.net, uggfind.com, uggfine.org,)
 ugg-flipflops1.com, uggforsaleboots.com,)
 uggforsaler.com, uggfrance.org,)
 uggfranceboutique.net, uggfromchina.com,)
 ugg-gloves.net, ugg-glovesuk.com,)
 ugggorizia.net, uggguanwang.com,)
 uggguenstig.net, ugghappy.com, ugghero.com,)
 ugghkcotra.com, ugghouseshoes-uk.com,)
 uggi.us, ugginireland.com, ugg-kids-classic-)
 uk.com, ugg-knightsbridge-black.com,)

uggknightsbridgeboots-uk.com, uggkopen.org,)
ugglace.com, ugglkeboots.com, ugglions.com,)
uggmadrid.net, uggmalls.com, uggsmax.com,)
ugg-metallic.com, uggmilano.net,)
uggminiboots.com, uggmoccasins.org,)
uggmontreal.net, uggmvp.com, uggmvp.com,)
uggmvp.org, uggsmybest.com, uggnbootsl.com,)
ugg-nederland.org, uggsnewshop.org,)
uggsnewstore.org, ugg-newzealand.com,)
uggnightfallboots.com, uggsofficialonline.com,)
uggsofficialsshop.com, ugg-official-)
website.com., uggonboots.com,)
uggonlinebestellen.com, uggonlines.org,)
uggonlinesalecom.com, ugg-onlineshop.com,)
uggonlineshops.com, uggonlineuk.com,)
uggonly.com, uggsonsale.cc, uggsonsale.org,)
ugg-onsale.us, uggsonsale-uk.net, ugg-)
outlet.net, uggsoutlet2u.com,)
uggsoutlet4sale.com, uggsoutlet4-store.com,)
uggsoutlet4-stores.net, ugg-outlet-australia.com,)
uggsoutlet-boots.net, uggsoutlethere.com,)
uggsoutlet-online.org, ugg-outlet-online.org,)
uggsoutlet-onlines.com, uggsoutletonlines.net,)
ugg-outlets.net, uggsoutletsonline.com, ugg-)
outletsonline.us, ugg-outlet-store-online.com,)
uggsoutletstoreonline.us, uggsparis.org, ugg-)
pascher.org, ugg-patchwork-boots.com,)
uggspifa.com, uggspifa.net, uggsprice.org,)
uggsprix.net, uggsroxy.com, uggs2011-uk.com,)
uggs-4outlet-store.net, uggs-4outlet-stores.net,)
uggs4sale.net, uggsale-australia.com, uggsale-)
boots.org, uggsaleboots2011.com,)
uggsalecanada.com, uggsalecanada.net,)
uggsaleireland.net, uggsalemall.com,)
uggsaleonline.org, uggsale-outlet.com,)
uggsaleoutlet.net, uggsaleparty.com,)
uggsales.cc, uggsalesireland.com,)
uggsalesireland.net, uggsalesonlinestore.com,)
uggsandalsslippers.com, uggsandalsuk.com,)
uggs-australia-boots-sale.org, uggs-australia-)
boots-uk.com, uggsaustralia-ca.com,)
uggsaustralia-ie.com, uggs-australian-)
boots.com, uggs-australian-ca.com,)
uggsaustralia-nederland.com, uggs-australian-)
nl.com, uggsaustralian-outlet.com,)
uggsaustralia-us.com, uggsaves.com, uggs-)
bags.com, uggs-bailey-button.org,)
uggsbaileybuttons.com,)
uggsbaileybuttontriplets.com,)
uggsbaileytriplet.com, uggs-belgie.com,)
uggsbelgique.net, uggsbestbuy.com,)
uggsbestellen.org, uggsboot4u.com, uggsboot-)
cheap.com, uggsbootincanada.com, uggs-boot-)
sale.net, uggsbootsalecheap.com,

uggsbootsaleuk.net, uggs-boots-au.com,)
uggsbootsaustralia.net, uggs-boots-australia-)
au.com, uggs-boots-baby-uk.com, uggs-boots-)
black.com, uggsboots-canada.com,)
uggsbootscanada.net, uggsboots-)
deutschland.com, uggs-boots-discount-uk.com,)
uggs-boots-for-cheap.com, uggs-boots-for-)
cheap-us.com, uggs-boots-for-men-uk.com,)
uggsbootsforwomen.com, uggs-boots-)
girls.com, uggs-boots-gr.com,)
uggsbootsgreece.net, uggsbootshoe.com,)
uggsbootshoponline.com,)
uggsbootshopping.com, uggsboots-)
ireland.com, uggs-boots-ireland.com,)
uggsboots-losangeles.com, uggsboots-)
malls.net, uggsboots-onsale.com,)
uggsbootsonsaleca.com, uggs-bootsoutlet.net,)
uggsbootsoutlet.us, uggsbootsoutlet4u.com,)
uggs-boots-pink-uk.com, uggs-boots-purple-)
uk.com, uggsboots-sale.net, uggs-boots-)
sale.org, uggsbootssale2011.com,)
uggsbootssaleie.com, uggs-boots-sale-uk.com,)
uggs-boots-sale-uk.org, uggs-boots-sale-)
usa.com, uggsboots-uk.com, uggs-)
bootsuk.com, uggsbootsuksale.net,)
uggsbootsuksale.org, uggs-button.com,)
uggscanadaboot.com,)
uggscanadabootssale.com,)
uggscanadabootssale.net, uggs-canada-)
online.com, uggs-canadaonline.com,)
uggscanadasales.com, uggs-cardyboots.org,)
uggscentre.com, uggs-cheap.org,)
uggscheapastralia.com, uggscheapstore.com,)
uggscheapstore.net, uggschestnutonline.com,)
ugg-schoenen-nl.com, uggs-classic-cardy-)
grey.org, uggsclassictallsale.net, uggs-)
clearance-boots-sale.com, uggs-coupons.org,)
uggsdanmark.net, uggsdealer.com,)
uggsdesign.com, uggsdeutschland.com,)
uggsdeutschland.net, uggs-discount-boots.com,)
uggsdiscountonline.com, uggserin-uk.com,)
uggseurope.org, uggssevera.com, uggs-factory-)
outlet.org, uggsflipflops.com,)
uggsfluffflipflop.com, uggsforcheap2011.com,)
uggs-for-cheap-sale.com, uggs-for-sale.us,)
uggsforsales.net, uggsfreeshipping.com,)
uggsgreece.com, uggs-greece.com,)
uggsheepskin-boots.com, uggsshoesbuy.org,)
uggshoeshops.com, uggsshoesmarket.org,)
uggshoesonlinesale.org, uggs-shop.cc,)
uggshopau.com, uggs-shop-online.com,)
uggshoppe.us, uggsshopstyle.com,)
uggsincheap.com, uggsinorge.org,)
uggsinukshop.com, uggsireland.org,)

uggsirelandsale.net, uggssitalia.com, ugg-)
site.com, uggskengat.net, uggskor.com,)
uggskor.org, uggisleatherboots-uk.com,)
uggsleopardboots.com, uggisleopardboots-)
uk.com, uggsmall-uk.com, uggsmen-uk.com,)
uggsmetallic-uk.com, uggsmontreal.com,)
uggsnederland.biz, ugg-nederland.org,)
uggsnewyork-uk.com, uggsnightfall-uk.com,)
uggsnl.org, uggsnowboots-outlet.com,)
uggsnz.com, uggsoldes.net, uggsoldes.org,)
uggsonlinebestellen.biz,)
uggsonlinebestellen.com,)
uggsonlinebestellen.net,)
uggsonlinebestellen.org,)
uggsonlinecanada.com,)
uggsonsalecanada.com, uggsonsalecanada.net,)
uggs-on-sale-discount.com, uggson-sale-)
discounts.com, uggsonsaleie.com,)
uggsonsaleireland.com, uggsonsalemall.com,)
uggs-onsale-nl.com, uggsonsaleonline.com,)
uggs-onsale-uk.org, uggsonsale-us.com,)
uggsonsale-us.net, uggoutlet2010.com, ugg-)
outlet2u.net, uggoutlet-4store.org, uggoutlet-)
australia.com, uggoutletion.com,)
uggoutletion.net, ugg-outlet-mall.com, ugg-)
outlet-malls.com, uggoutlet-nl.com, ugg-)
outlet-online.com, uggoutlet-online.net, ugg-)
outlet-online.net, ugg-outletonline.us,)
uggoutletonline1.com, uggoutletonlines.org,)
uggoutletour.com, uggoutlets4-stores.net,)
ugg-outletsale.com, uggoutlets-onlines.com,)
uggoutlets-stores.us, ugg-outletstore.net,)
ugg-outletstores.org, uggoutletstores.us,)
ugg-outletstores.us, uggoutletstores4s.net,)
ugg-outletuk.com, ugg-outlet-uk.com,)
uggoutlet-uk.org, uggoutlet-us.com,)
uggspascher-fr.com, uggsprix.net,)
uggsromanticflower.com, ugg-sale-au.com,)
uggs-sales.com, uggssalescanada.com,)
uggssaleshops.com, uggssaleukboots.com,)
uggsschweiz.org, uggshoe.com, ugg-)
shoes.org, uggshoes-ie.com,)
uggsshopcanada.net, uggsshort.com,)
uggssize11.com, ugg-size-8.com,)
uggssolutions.com, uggstore-newyork.com,)
uggstyle-2011.com, ugg-store.org,)
uggstore2011uk.com, uggstore2011-uk.com,)
uggstore-nyc.com, uggstore-online.net, ugg-)
storeoutlet.com, uggstore-outlet.net,)
uggstoresonline.com, uggstore-uk.net, ugg-)
stovlar.com, uggstresko.com, uggstresko.net,)
uggs-uggs.net, uggssuisse.net, uggukboot.com,)
uggs-uk-onsale.com, uggsunburst.com,)
uggsusa-outlet.com, ugg-wedges-boots-

uk.com, uggs-winter.com, uggtall-online.com,)
 uggtobao.com, uggtrend.com, ugguisse.com,)
 ugguksite.com, ugg-ultra-short.com,)
 ugguug.com, ugguus.com, uggwin.com, ugg-)
 winters.com, uggwomensboots.com,)
 uggworld.org, uglyuggs.org, uk-)
 uggaustriaboos.com, uk-uggboots.net,)
 ukuggonlineshop.com, uk-uggsonsale.com,)
 usauggbootssale.net, usauggmall.com,)
 usauggsale.com, uuggg-boots.com,)
 wayugg.com, wholesaleuggbootsuk.com,)
 womenscheapuggs.com, womens-classic-cardy-)
 ugg-boots.com, womens-classictall-ugg-)
 boots.com, worlduggboots.com and zappos-)
 uggs.org,

Defendants.

**COMPLAINT FOR IN REM INJUNCTIVE RELIEF UNDER THE
 ANTICYBERSQUATTING CONSUMER PROTECTION ACT**

Plaintiff Deckers Outdoor Corporation ("Deckers") alleges as follows in support of its in rem claim against each of the Internet domain names 2011cheapuggs.com, 2011uggoutlet.com, 66ugg.com, 88ugg.com, achatuggbottes.com, acheteruggsboot.com, allcoloruggs.com, alluggbootsclearance.com, ankaufenuggboots.com, askuggboots.com, auggbootstore.com, australians-ugg.com, australianuggboots-usa.com, australiauggshoes.com, ausuggshop.com, authenticuggbootshop.com, authentic-uggs-boots.com, au-uggboots.net, au-uggbootsclearance.com, auuggs.com, babyuggbootsuk.com, baileybootsuk.com, bailey-button-bomber-uggs.com, bailey-button-bomber-uggs.org, baileybuttonuggbootsuk.com, baileybuttonuggs.net, bailey-button-uggs-uk.com, baileybuttonugguk.com, bayugg.com, bestfourugg.com, bestpriceuggs.com, best-ugg.org, bestuggboots.org, bestuggsboots.com, bestuggsonsale.com, best-uggs-outlet.com, bestuggwear.com, black-bailey-button-ugg-boots.org, black-bailey-button-uggs.org, black-cardy-ugg-boots.org, black-cardy-uggs.org, blackuggboots.com, blackuggboots.org, blackuggbootsuk.net, blackuggs.org, blueuggboots.org,

blueuggbootsau.com, blueuggboots-au.com, boots-uggboots.com, bootsuggcheapsale.com,
bootsuggsaustralia.com, bootsuggsaustralia.net, bootsuggsca.com, bootsuggstore.com,
bootuggsca.com, bootuggscanada.com, bootuggssale.com, bootuggssale.net, botasugg.org,
botasuggenmadrid.net, bottes-uggs.net, boys-uggsboots.com, brown-bailey-button-uggs.org,
buttonugg.com, buy4cheapugg.com, buycheapuggsboot.com, buyuggboots2011.com,
buyuggbootsau.com, buyuggboots-au.com, buyuggbootsonline.com, buy-uggsboots-
onlineuk.com, buyuggshoe.com, canadaugg.com, canada-uggboots.com, canadauggboots.org,
canadauggbootss.net, canadauggsboot.net, cardyuggs.net, cheap2uggboots.com,
cheapbootsugg.net, cheapest-ugg-boots.com, cheapforuggs.org, cheapkidsuggs-uk.com,
cheaponuggs.com, cheapugg.cc, cheap-ugg.com, cheap-ugg-australia.com, cheapuggboots1.com,
cheapuggboots-ca.com, cheapuggboots-canada.com, cheapuggboots-ie.com, cheapuggboots-
ireland.com, cheapuggbootsireland.net, cheap-ugg-boots-onsale.com, cheap-uggbootsonsale.org,
cheap-uggbootssale.net, cheap-uggbootssaleuk.com, cheapuggbootsstore.org,
cheapuggbootstores.com, cheapuggbootsuggs.com, cheapugg-bootsuk1.com,
cheapuggcanada.net, cheap-uggcanada.net, cheapuggcardyboots.com, cheap-
uggclassicboots.com, cheapuggdiscount.com, cheapuggjboots.com, cheap-ugg-outlet.com,
cheapuggs2011.com, cheapuggs4uk.com, cheapuggsalestore.com, cheap-uggsaustralia.com,
cheapuggsbootonlines.com, cheap-uggsboots.net, cheapuggsboots-ca.com,
cheapuggsbootscanada.com, cheap-uggs-boots-forsale.com, cheap-uggs-boots-forsale-uk.com,
cheap-uggs-boots-online.com, cheap-uggs-boots-onsale.com, cheap-uggs-boots-saleuk.com,
cheap-uggs-bootss-onsale.com, cheap-uggs-boots-us.com, cheapuggsbootuk.com,
cheapuggscanada.net, cheapuggsoutlet-uk.com, cheap-uggs-shoes-sale.com,
cheapuggsstoreuk.com, cheapwomenuggs.com, chestnutuggboots.com, childrens-uggs-boots-

uk.com, childrenuggbootstore.com, chinauggs.com, chocolateuggboots.com, classicshortuggs-uk.com, classicalluggsboots-uk.com, classicuggs.org, classicuggsbootsuk.com, clearanceuggbootsus.com, comprarugg.net, discount4uggboots.com, discountcheapugg.com, discounted-uggs-uk.com, discount-ugg.com, discountugg-boots.net, discountuggbootssaleonline.com, discountuggoutlets.com, discountuggsales.com, discountuggsbootonline.com, discount-uggs-boots.org, discountuggsbootsale.com, discountuggsoutlet.org, discount-uggs-us.com, dropshipugg.com, easyuggshop.com, ecuggboot.com, emuuggs-au.com, enjoy-uggboots.com, e-uggbootssaleuk.com, euggstore.com, fancyuggsale.com, fashionugg.org, fashionuggbootsca.com, fashionuggsoutlet.com, freeuggsell.com, genuine-uggboots.net, genuineuggboots4u.com, getuggboots.us, girls-uggboots.com, giveugg.com, global-ugg.com, godloverugg.com, goodugg.net, gooduggboots.net, gotobuyugg.com, gotouggstore.com, go-uggboots.com, gouggs.com, guenstiguggboots.com, happyuggonline.com, hereuggboots.com, heyugg.com, highugg.com, hiugg-boots.com, hiuggsoutlet.com, hot-pink-uggs-boots-uk.com, hotsale-uggboots.com, hotuggbootsclearance.com, iclassicugg.com, irelanduggsbootssale.com, irelanduggsbootssale.net, jimmychoouggboot.com, justuggboot.com, kids-uggs.com, kids-uggsboots-cheap-uk.com, knock-off-uggs.com, kopenuggboots.com, laarzen-ugg.com, ladies-ugg.com, ladyugg.us, leatherugg.com, liliugg.com, linkuggs.com, loveinuggboots.com, loveuggsboots.com, luxuryuggsbootsoutlets.net, maleuggboots-uk.com, mall-uggsboots.com, manuggboots.com, mensuggs-boots.com, mens-uggs-boots-uk.org, metallic-uggs.com, mini-uggs-boots-uk.com, mybestuggs.com, myuggbootsoutlet.com, myuggbootsus.com, myuggbootszone.com, myuggs.org, myuggseller.com, navyuggs.com, nederlanduggs.com, netbuyugg.com, netherlandsuggboots.com, newuggbootssale.com, newuggboots-sale.com,

nordstrom-uggs-boots-ca.com, nthuggs.com, obuyuggs.com, officialugg.com, officialugg.org, onlineshoesugg.com, onlineuggbootsale.com, onlineuggsbootsale.com, onlycheapugg.com, orderuggs.com, originaluggboots-uk.com, outletugg.org, outletuggboot.com, outletuggs.org, paiugg.com, pick-uggboots.com, pink-uggs-boots-uk.com, prezzougg.org, purple-ugg-boots.com, purple-uggs-boots.com, purple-uggs-boots-uk.com, realugg.com, real-ugg-boots.com, real-uggs-boots-uk.com, realugguk.com, red-uggboots.com, replica-ugg-boots-uk.com, sale2uggboots.com, salesuggboot.com, salesuggbootsonline.com, sales-uggs-boots.net, sale-uggboots.net, saleuggbootsclearance.org, saleuggbots.com, saleuggsales.com, saleukuggboots.com, sbuggs.com, scarpeuggs.org, schoenenugg.com, selluggsboots.com, sexyuggs.com, shoesuggs.com, shopping-ugg.net, shortugg.com, shortuggsale.com, silveruggs.com, snowuggshoes.com, stiefeluggs.com, stivaliuggs.com, sundanceugg.com, superbugg.com, switzerlandugg.net, talluggbootsuk.org, theaustraliaugg.com, thecheapuggboots.com, theuggaustraliaboots.com, theuggbootsale.com, theuggbootsmall.com, theuggbootsuk.com, thuggaustralia.com, topugg.com, topugg4u.com, topuggbootsale.com, topuggbootsus.com, tougg.org, ugg2baileybutton.com, ugg2sheep.com, ugg2you.com, ugg2your.com, ugg-4boots-sale-uk.com, ugg4outlet-stores.net, ugg555.com, ugg-adirondack-otter.com, uggadirondacktallboot.com, uggale.com, uggatms.com, uggauseshop.com, uggaustralia-au.com, uggaustraliabarcelona.com, uggaustraliaboots.org, ugg-australiaboots.us, uggaustraliacanada.org, uggaustraliadk.net, uggaustraliaespana.org, uggaustraliagreece.com, uggaustraliaireland.net, uggaustralianederland.net, uggaustralianorge.org, ugg-australiaoutlet.com, uggaustralia-outlet.net, uggaustraliaoutletstore.com, uggaustraliapascher.com, uggaustraliaretail.org, uggaustraliashoes.org, uggaustraliasverige.net, uggba.com, uggbaileybootsuks.com, uggbailey-button.com, ugg-baileybutton1.com, ugg-bailey-

button-bomber.org, ugg-bailey-button-bomber-brown.org, ugg-bailey-button-chestnut.org, ugg-bailey-button-fancy.org, ugg-bailey-button-leopard.com, uggbaileybuttons.net, uggbaileybutton-sale.net, ugg-bailey-button-sand.com, ugg-bailey-button-triplet.com, uggbaileybuttontriplet.us, uggbaileytriplet.com, uggbaratas.com, uggbest.org, uggbestsale.com, uggboots.com, uggbootau.com, uggbootbar.com, uggbootbestshop.com, uggbootcanada.com, uggbootcardy.com, uggbootery.com, uggbootop.com, ugg-boots1.com, uggboots2012.com, uggboots2cheap.com, ugg-boots4-sale-uk.net, uggboots61.com, uggboots86.com, uggboot-sale.net, uggboot-sale.org, uggbootsale100.com, uggbootsaleshop.com, uggbootsamerica.com, uggbootsamerica.net, uggbootsaustralia.org, uggbootsaustraliaonsale.com, uggbootsaustralia-us.com, uggbootsbaileybuttonuk.com, uggbootsbestshop.net, uggbootsbestshops.com, uggbootsbeststores.net, uggbootsbillig.net, uggbootsboutique.com, uggbootsbrisbane.net, uggboots-ca.com, uggboots-canada.biz, uggboots-canada.net, ugg-bootscanada.net, uggboots-canada.org, uggbootscanadasale.com, uggbootscanadasale.net, uggbootscanadasales.com, uggbootscheapau.com, uggbootsclassiccardy.org, uggbootsclearancemore.com, uggbootsclearancen.com, uggbootsclearanceol.com, uggbootsclearance-onsale.com, uggbootsclearanceonsales.com, ugg-boots-clearance-sale.com, uggbootsdanmark.org, ugg-boots-deutschland.net, uggboots-discount.us, uggbootsdiscountsell.net, uggbootsdiscountuk.com, uggbootses.com, uggbootsesale.com, uggbootsfactory.com, uggboots-france.com, uggbootsfree.com, uggbootsfreeshipping.com, uggboots-greece.net, uggbootsgreeces.net, uggbootsgreet.com, uggbootsguenstig.org, ugg-boot-shoes.com, uggbootshoescheap.org, uggbootshongkong.org, uggbootshop.org, uggbootshotsalestore.com, uggbootsicon.com, uggbootsireland.biz, ugg-bootsireland.com, uggbootskom.com, uggbootslady-uk.com, uggbootslondon.com, uggbootsmalluk.com, uggbootsnederland.org, uggboots-nederland.org,

uggbootsnewstyle.com, uggboots-nz.com, uggbootsofferuk.com, ugg-boots-online-nl.com, uggbootsonlineshops.com, uggbootsonlinestore.net, uggbootsonsaleuggs.com, uggboots-on-sale-uk.com, uggbootsoutlet1.com, uggbootsoutlet2u.net, uggbootsoutletaustralia.com, ugg-boots-outlet-sale.com, uggbootsoutletssales.com, ugg-boots-outlet-store.com, uggbootsoutletstores.org, uggbootsoutletstores.us, uggbootspeople.com, uggbootsperth-au.com, uggbootsquare.com, ugg-boots-retailers.com, uggbootssale11.com, uggbootssale4s.com, uggbootssaleau.com, ugg-boots-sale-canada.com, uggbootssalehot.com, uggbootssalehot.net, uggbootssale-ie.com, uggbootssaleintheuk.com, uggbootssaleon.com, uggbootssaleonline.com, uggboots-sales.net, uggboots-salesite.com, uggbootssalesuk.com, uggbootssaleuk.net, ugg-bootssale-uk.org, uggbootssaleuk-uk.com, uggbootssale-us.com, ugg-bootssaleus.com, uggbootssaleus.us, uggbootssale-usa.org, uggbootsscanada.com, uggboots-schweiz.com, ugg-boots-shoes.org, uggbootsshopping-uk.com, ugg-boots-size3.com, uggbootsster.com, uggboots-stores.com, uggbootssuomi.net, uggbootsswitzerland.com, uggbootsswitzerland.net, uggbootsukoutlet.com, ugg-boots-uk-sale.net, uggboots-uksale.org, uggbootsukshops.com, uggbootsup.com, uggbootswatch.com, uggbootswien.org, uggbootswomen.com, uggbootsxaustralia.com, uggbootszuerich.org, uggbootuk.com, uggbootuk.org, uggbootwoman.com, ugg-bots-uk.com, uggbruxelles.com, uggbruxelles.org, uggbuttontriplet.com, uggcanada.net, ugg-canada.net, ugg-cardy.com, ugg-cardy-boots-sale.com, ugg-cardy-boots-sale-uk.com, uggcardybootsuk.com, ugg-cardy-knitted-boot.com, uggcardyretaille.com, uggcardy-sale.com, uggcashop.com, uggcat.com, uggchaussure.org, uggchaussures.net, uggchestnut.com, ugg-chestnut-classic-short.com, ugg-chestnut-classic-tall.com, ugg-china.org, uggchina-nl.com, uggchineseshop.com, uggchocolate.com, ugg-chocolate-classic-tall.com, uggclaasiccardy.com, uggclassic.org, uggclassicboots.org, uggclassiccardy.com, ugg-classiccardy1.com, uggclassiccardyboots.com,

ugg-classic-cardy-boots-grey.com, ugg-classic-short-boots-sand.com, ugg-classic-tall1.com, ugg-classic-tall-black-boots.org, ugg-classic-tall-bomber.com, uggclearanceshop.com, uggclubs.com, uggcnshop.com, uggcsizma.com, uggdakota.com, ugg-dakota-chestnut.org, ugg-deal.com, uggdeutschland.com, uggdeutschland.net, ugg-discount-boots.com, uggdiscountbootsuk.com, ugg-discount-outlet.com, uggdiscountstore.com, uggdiscountuk.com, uggdiscountus.com, uggeden.com, uggem.com, ugg-emu.org, uggensuisse.com, uggeoutlet.com, uggeronwalk.com, uggeurope.com, uggevera.com, uggfactorystore.net, uggfind.com, uggfine.org, uggflipflops1.com, uggforsaleboots.com, uggforsaler.com, uggfrance.org, uggfranceboutique.net, uggfromchina.com, ugg-gloves.net, ugg-glovesuk.com, ugggorizia.net, uggguanwang.com, uggguenstig.net, ugghappy.com, ugghero.com, ugghkcotra.com, ugghouseshoes-uk.com, uggi.us, ugginireland.com, ugg-kids-classic-uk.com, ugg-knightsbridge-black.com, uggknightsbridgeboots-uk.com, uggkopen.org, ugglace.com, ugglikeboots.com, ugg lions.com, uggmadrid.net, uggmalls.com, uggmax.com, ugg-metallic.com, uggmilano.net, uggminiboots.com, uggmoccasins.org, uggmontreal.net, uggmv.com, uggmvp.com, uggmvp.org, uggmybest.com, ugnboots1.com, ugg-nederland.org, uggnewshop.org, uggnewstore.org, ugg-newzealand.com, uggnightfallboots.com, uggofficialonline.com, uggofficialsshop.com, ugg-official-website.com., uggonboots.com, uggonlinebestellen.com, uggonlines.org, uggonlinesalecom.com, ugg-onlineshop.com, uggonlineshops.com, uggonlineuk.com, uggonly.com, uggonsale.cc, uggonsale.org, ugg-onsale.us, uggonsale-uk.net, ugg-outlet.net, uggoutlet2u.com, uggoutlet4sale.com, uggoutlet4-store.com, uggoutlet4-stores.net, ugg-outlet-australia.com, uggoutlet-boots.net, uggoutlethere.com, uggoutlet-online.org, ugg-outlet-online.org, uggoutlet-onlines.com, uggoutletonlines.net, ugg-outlets.net, uggoutletsonline.com, ugg-outletsonline.us, ugg-outlet-store-online.com, uggoutletstoreonline.us, uggparis.org, ugg-

pascher.org, ugg-patchwork-boots.com, uggpifa.com, uggpifa.net, uggprice.org, uggprix.net, uggroxy.com, uggs2011-uk.com, uggs-4outlet-store.net, uggs-4outlet-stores.net, uggs4sale.net, uggsale-australia.com, uggsale-boots.org, uggsaleboots2011.com, uggsalecanada.com, uggsalecanada.net, uggsaleireland.net, uggsalemall.com, uggsaleonline.org, uggsale-outlet.com, uggsaleoutlet.net, uggsaleparty.com, uggsales.cc, uggsalesireland.com, uggsalesireland.net, uggsalesonlinestore.com, uggsandalsslippers.com, uggsandalsuk.com, uggs-australia-boots-sale.org, uggs-australia-boots-uk.com, uggsaustralia-ca.com, uggsaustralia-ie.com, uggs-australian-boots.com, uggs-australian-ca.com, uggsaustralia-nederland.com, uggs-australian-nl.com, uggsaustralian-outlet.com, uggsaustralia-us.com, uggsaves.com, uggs-bags.com, uggs-bailey-button.org, uggsbaileybuttons.com, uggsbaileybuttontriplets.com, uggsbaileytriplet.com, uggs-belgie.com, uggsbelgique.net, uggsbestbuy.com, uggsbestellen.org, uggsboot4u.com, uggsboot-cheap.com, uggsbootincanada.com, uggs-boot-sale.net, uggsbootsalecheap.com, uggsbootsaleuk.net, uggs-boots-au.com, uggsbootsaustralia.net, uggs-boots-australia-au.com, uggs-boots-baby-uk.com, uggs-boots-black.com, uggsboots-canada.com, uggsbootscanada.net, uggsboots-deutschland.com, uggs-boots-discount-uk.com, uggs-boots-for-cheap.com, uggs-boots-for-cheap-us.com, uggs-boots-for-men-uk.com, uggsbootsforwomen.com, uggs-boots-girls.com, uggs-boots-gr.com, uggsbootsgreece.net, uggsbootshoe.com, uggsbootshoponline.com, uggsbootshopping.com, uggsboots-ireland.com, uggs-boots-ireland.com, uggsboots-losangeles.com, uggsboots-malls.net, uggsboots-onsale.com, uggsbootsonsaleca.com, uggs-bootsoutlet.net, uggsbootsoutlet.us, uggsbootsoutlet4u.com, uggs-boots-pink-uk.com, uggs-boots-purple-uk.com, uggsboots-sale.net, uggs-boots-sale.org, uggsbootssale2011.com, uggsbootssaleie.com, uggs-boots-sale-uk.com, uggs-boots-sale-uk.org, uggs-boots-sale-usa.com, uggsboots-uk.com, uggs-bootsuk.com, uggsbootsuksale.net,

uggsbootsuksale.org, ugg-button.com, uggscanadabout.com, uggscanadaboutssale.com,
uggscanadaboutssale.net, uggscanada-online.com, uggscanadaonline.com,
uggscanadasales.com, uggscardyboots.org, uggscentre.com, ugg-cheap.org,
uggscheapaustralia.com, uggcheapstore.com, uggcheapstore.net, uggschestnutonline.com, ugg-
schoenen-nl.com, ugg-classic-cardy-grey.org, uggclassicallsale.net, ugg-clearance-boots-
sale.com, ugg-coupons.org, uggdanmark.net, uggdealer.com, uggdesign.com,
uggdeutschland.com, uggdeutschland.net, ugg-discount-boots.com, uggdiscountonline.com,
uggserin-uk.com, uggseurope.org, uggsevera.com, ugg-factory-outlet.org, uggflipflops.com,
uggsflufflipflop.com, uggforcheap2011.com, ugg-for-cheap-sale.com, ugg-for-sale.us,
uggsforsales.net, uggfreeshipping.com, uggsgreece.com, ugg-greece.com, uggsheepskin-
boots.com, uggshoesbuy.org, uggshoeshops.com, uggshoesmarket.org, uggshoesonlinesale.org,
ugg-shop.cc, uggshopau.com, ugg-shop-online.com, uggshoppe.us, uggshopstyle.com,
uggsincheap.com, uggsinorge.org, uggsinukshop.com, uggshireland.org, uggshirelandsale.net,
uggsitalia.com, ugg-site.com, uggskengat.net, uggskor.com, uggskor.org, uggslatherboots-
uk.com, uggslopardboots.com, uggslopardboots-uk.com, uggsmall-uk.com, uggsmann-uk.com,
uggsmetallic-uk.com, uggsmontreal.com, uggsnederland.biz, ugg-nederland.org, uggnewyork-
uk.com, uggsnightfall-uk.com, uggsnl.org, uggsnowboots-outlet.com, uggsnz.com,
uggsoldes.net, uggsoldes.org, uggsonlinebestellen.biz, uggsonlinebestellen.com,
uggsonlinebestellen.net, uggsonlinebestellen.org, uggsonlinecanada.com, uggsonsalecanada.com,
uggsonsalecanada.net, uggson-sale-discount.com, uggson-sale-discounts.com,
uggsonsaleie.com, uggsonsaleireland.com, uggsonsalemall.com, uggsonsale-nl.com,
uggsonsaleonline.com, uggsonsale-uk.org, uggsonsale-us.com, uggsonsale-us.net,
uggsoutlet2010.com, ugg-outlet2u.net, uggoutlet-4store.org, uggoutlet-australia.com,

uggsoutletion.com, uggoutletion.net, ugg-outlet-mall.com, ugg-outlet-malls.com, uggoutlet-nl.com, ugg-outlet-online.com, uggoutlet-online.net, ugg-outlet-online.net, ugg-outletonline.us, uggoutletonline1.com, uggoutletonlines.org, uggoutletour.com, uggoutlets4-stores.net, ugg-outletsale.com, uggoutlets-onlines.com, uggoutlets-stores.us, ugg-outletstore.net, ugg-outletstores.org, uggoutletstores.us, ugg-outletstores.us, uggoutletstores4s.net, ugg-outletuk.com, ugg-outlet-uk.com, uggoutlet-uk.org, uggoutlet-us.com, uggspascher-fr.com, uggsprix.net, uggromanticflower.com, ugg-sale-au.com, ugg-sales.com, uggssalescanada.com, uggssaleshops.com, uggssaleukboots.com, uggsschweiz.org, ugg-shoe.com, ugg-shoes.org, ugg-shoes-ie.com, uggshopcanada.net, uggshort.com, uggsize11.com, ugg-size-8.com, uggssolutions.com, uggstore-newyork.com, uggstyle-2011.com, ugg-store.org, uggstore2011uk.com, uggstore2011-uk.com, uggstore-nyc.com, uggstore-online.net, ugg-storeoutlet.com, uggstore-outlet.net, uggstoresonline.com, uggstore-uk.net, ugg-stovlar.com, uggstresko.com, uggstresko.net, ugg-uggs.net, ugguisse.net, uggukboot.com, ugg-uk-onsale.com, uggsunburst.com, uggusa-outlet.com, ugg-wedges-boots-uk.com, ugg-winter.com, ugg-tall-online.com, uggtaobao.com, uggtrend.com, ugguisse.com, ugguksite.com, ugg-ultra-short.com, uggug.com, ugguus.com, uggwin.com, ugg-winters.com, uggwomensboots.com, uggworld.org, uglyuggs.org, uk-uggaustraliaboos.com, uk-uggboots.net, ukuggonlineshop.com, uk-uggsonsale.com, usauggbootssale.net, usauggmall.com, usauggsale.com, uggg-boots.com, wayugg.com, wholesaleuggbootsuk.com, womencheapuggs.com, womens-classic-cardy-ugg-boots.com, womens-classictall-ugg-boots.com, worlduggboots.com and zappos-uggs.org, (collectively the “Defendant Domain Names”):

I. JURISDICTION AND VENUE

This Court has subject matter jurisdiction of this claim pursuant to 28 U.S.C. §§ 1331 and 1338 because Deckers' claims arise under 15 U.S.C. § 1125(d).

This Court has in rem jurisdiction over the Defendant Domain Names pursuant to 15 U.S.C. §1125(d)(2)(A)(ii)(II) because, through due diligence, Deckers was unable to find a person who would have been a defendant in a civil action under 15 U.S.C. §1125(d)(1) and has sent notice to the registrants of the Defendant Domain Names, pursuant to 15 U.S.C. §1125(d)(2)(A)(ii)(II)(aa), and will promptly publish the notice of the action after filing, pursuant to 15 U.S.C. § 1125(d)(2)(A)(ii)(II)(bb). In rem jurisdiction is proper in this district pursuant to 15 U.S.C. § 1125(d)(2)(C)(i) because the domain name registries for the Defendant Domain Names, namely VeriSign, Inc., Neustar, Inc. and the Public Interest Registry, are located in this judicial district.

Venue is proper in this judicial district pursuant to 28 U.S.C. §1391(b)(2) and 15 U.S.C. §§1125(d)(2)(A) and (C) because the domain name registries for the Defendant Domain Names, namely VeriSign, Inc., Neustar, Inc. and the Public Interest Registry, are located in this judicial district.

The registrant contact information and registry for each Defendant Domain Name is listed in the attached Schedule A.

II.INTRODUCTION

This action has been filed by Deckers to combat the unlawful use of the Defendant Domain Names which trade upon Deckers' reputation and goodwill to sell and/or offer for sale unlicensed and counterfeit products featuring Deckers' UGG trademark. Through such actions,

Deckers has been and is irreparably damaged through consumer confusion, dilution and tarnishment of its valuable trademark and is seeking injunctive relief.

Deckers seeks an injunction transferring the Defendant Domain Names to Deckers.

III. THE PARTIES

The Plaintiff

Deckers is famous throughout the United States and elsewhere as a source of high quality footwear products, including the UGG® brand of premium sheepskin footwear. Deckers' UGG products are distributed and sold to consumers by retailers throughout the United States, the uggaustralia.com website and UGG Concept Stores.

Since acquiring the UGG trademark and the goodwill of the business in 1995, Deckers has continuously sold footwear and clothing under the UGG trademark (the "UGG Trademark"). Deckers has built substantial goodwill in the UGG Trademark. The UGG Trademark is famous and a valuable asset of Deckers.

Deckers holds registrations for the UGG Trademark (and stylized variations) in more than 100 countries around the world including U.S. Trademark Registration No. 3,050,925. The UGG Trademark has been used continuously since at least as early as 1979 by Deckers and its predecessors in interest. A true and correct copy of United States Registration No. 3,050,925 is attached hereto as Exhibit 1. This registration is valid and subsisting.

The UGG Trademark is inherently distinctive when applied to high quality apparel, footwear and related merchandise, signifying to the purchaser that the products come from Deckers. Whether Deckers manufactures the products itself, or licenses others to do it, Deckers has insured that products bearing its UGG Trademark and other trademarks are manufactured to the highest quality standards. Deckers' products branded under the UGG Trademark have been

widely accepted by the public and are enormously popular, as demonstrated by hundreds of millions of dollars in sales each year. The UGG Trademark is a famous mark.

The Defendants

The Defendant Domain Names are registered and operated by unknown individuals and business entities (collectively the “Defendants”) who, upon information and belief, reside in the People’s Republic of China or other foreign jurisdictions. Defendants conduct business throughout the United States, including within this Judicial District, through the operation of fully interactive commercial websites at each of the Defendant Domain Names identified in Schedule A attached hereto.

On information and belief, Defendants are an interrelated group of counterfeiters operating the Defendant Domain Names and acting in active concert or copying from each other and are knowingly and willfully manufacturing, importing, distributing, offering for sale and selling products bearing counterfeit versions of the UGG Trademark to United States residents. Defendants are directly and personally contributing to, inducing and engaging in the sale of counterfeit products as alleged herein, and on information and belief, often as partners, coconspirators and/or suppliers. The counterfeit products for sale on the various Defendant Domain Names bear similar irregularities and indicia of being counterfeit, indicating that the counterfeit products were manufactured by and come from a common source and that Defendants are interrelated. In addition, the websites linked to Defendant Domain Names include multiple similarities, such as the same page layout, text and copyrighted images copied from Deckers’ own uggaustralia.com website.

On information and belief, Defendants used multiple fictitious names and addresses to register the Defendant Domain Names. Many of the Defendant Domain Names are similar in

name and include commonalities in the corresponding registration information. For example, many of Defendants' names used to register the Defendant Domain Names are incomplete, randomly typed letters or street addresses with no cities or states listed. On information and belief, many of the aliases used by Defendants to register the Defendant Domain Names are used by the same individual or entity.

IV. DEFENDANTS' UNLAWFUL CONDUCT

Defendants engage in the offering for sale and sale of counterfeit and infringing UGG branded products bearing the UGG Trademark through multiple fully interactive commercial websites operating under at least the Defendant Domain Names. Defendants, upon information and belief, also operate additional websites which promote and offer for sale counterfeit and infringing goods under domain names not yet known to Deckers. Defendants have purposefully directed their illegal activities toward the United States and this judicial district through the advertisement, offer for sale, and sale of counterfeit UGG branded goods into this judicial district.

Defendants, without any authorization or license from Deckers, have knowingly and willfully used, and continue to use Deckers' UGG Trademark at each of the Defendant Domain Names in connection with the advertisement, offer for sale, and sale of counterfeit UGG branded products into the United States over the Internet. Each Defendant Domain Name links to a website offering for sale and selling counterfeit UGG products.

Defendants facilitate sales by designing their websites so that they appear to unknowing consumers to be authorized online retailers selling genuine UGG branded products. The websites are sophisticated-looking, written in English, and accept payment in U.S. dollars.

Many of the Defendant Domain Names incorporate Deckers' UGG Trademark and many include Deckers' copyright-protected images and product descriptions, making it very difficult for a consumer to distinguish such infringing counterfeit web sites from an authorized retailer.

The websites at the Defendant Domain Names each accept payment via credit card and/or PayPal and ship the counterfeit products in small quantities to minimize detection by U.S. Customs and Border Protection via the U.S. Postal Service.

Defendants further perpetuate the illusion of legitimacy by offering "live 24/7" customer service and using indicia of authenticity and security that consumers have come to associate with authorized retailers, including the McAfee® Security, VeriSign®, Visa®, MasterCard® and PayPal® logos.

Defendants' use of the UGG Trademark in connection with the advertising, distribution, offering for sale and sale of counterfeit UGG products using the Defendant Domain Names, is likely to cause and has caused confusion, mistake and deception by and among consumers and is irrevocably harming Deckers.

COUNT I

CLAIM FOR INJUNCTIVE RELIEF UNDER THE ANTICYBERSQUATTING CONSUMER PROTECTION ACT (15 U.S.C. § 1125(d))

Deckers hereby re-alleges and incorporates by reference the allegations set forth in paragraphs 1 through 20 as if fully set forth herein.

Deckers is the exclusive owner of the UGG Trademark. The UGG Trademark Registration (Exhibit 1) is in full force and effect. Additionally, the UGG Trademark is a famous mark pursuant to 15 U.S.C. § 1125 and was famous prior to and at the time of the registration of the Defendant Domain Names.

The Defendant Domain Names are each identical or confusingly similar to the UGG Trademark. The Defendant Domain Names have not been used and are currently not being used for any legitimate purpose. Rather, the Defendant Domain Names are being used to offer merchandise bearing counterfeit UGG marks through the web pages to which the Defendant Domain Names resolve. Each of the Defendant Domain Names was registered, has been used and is being used with a bad faith intent to profit from the UGG Trademark and Deckers' reputation. On information and belief, the registrants of the Defendant Domain Names exemplify bad faith and harm the goodwill represented by the UGG Trademark by offering goods bearing counterfeit UGG marks, diverting consumers from Deckers' legitimate online website and authorized retailers for the registrants' own commercial gain, and registering multiple domain names which infringe the rights of Deckers.

Defendants have no intellectual property rights in or to the UGG Trademark.

The Defendant Domain Names violate Deckers' rights in the UGG Trademark. They are identical, confusingly similar to, and dilutive of the famous UGG Trademark.

Defendants' actions constitute cyberpiracy in violation of §43(d) of the Lanham Act, 15 U.S.C. §1125(d).

Deckers has no adequate remedy at law, and the registration and use of the Defendant Domain Names has caused, is causing, and is likely to continue to cause, substantial and irreparable injury to the public and to Deckers. As such, Deckers is entitled to the transfer of the Defendant Domain Names, pursuant to 15 U.S.C. § 1125(d)(2)(D)(i).

PRAYER FOR RELIEF

WHEREFORE, Deckers prays for judgment against each Defendant Domain Name as follows:

- 1) Entry of an Order that the registrant or registry for each Defendant Domain Name, namely VeriSign, Inc., Neustar, Inc. and the Public Interest Registry, transfer to Deckers' control of each of the Defendant Domain Names; and
- 2) Award any and all other relief that this Court deems just and proper.

Dated this 23rd day of September, 2011.

Respectfully submitted,

Attorneys for Plaintiff Deckers,

By: 
Bruce Rheinstein (VSB No. 31578)
rheinstein@gmail.com
4125 Hampstead Lane
Woodbridge, VA 22192
Telephone: (253) 642-7823
Facsimile: (312) 360-9315

Justin R. Gaudio (IL Bar No. 6296562)
Greer, Burns & Crain Ltd.
jgaudio@gbclaw.net
Greer, Burns & Crain Ltd.
300 S. Wacker Drive, Suite 2500
Chicago, IL 60606
Telephone: (312) 987-2922
Facsimile: (312) 360-9315