

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.**

LOUIS VUITTON MALLETTIER,

Plaintiff,

vs.

AAAIMITATIONBAGS.COM a/k/a AAAREPLICASHOPS.COM a/k/a
FASHIONFAKESEASON.COM, ATOREPLICAHANDBAGS.COM
a/k/a BUYCHEAPREPLICAHANDBAGS.COM a/k/a
FAKESBAGSHOP.COM a/k/a FOREVERREPLICAPURSE.COM a/k/a
HANDBAGFAKES.COM a/k/a REPLICABAGS99.COM a/k/a
REPLICASALES.COM a/k/a SHOPPINGCHEAPS.COM,
BAGBELTSHOP.COM, BAGSFREESALE.COM,
BELTSOUTLET.CN, BOLSOS-TIENDAES.ORG a/k/a BORSELOUIS-
VUITTONSIT.ORG a/k/a LOUISSVUITTON-TASCHENS.ORG a/k/a
LOUIS-VUITTONSSCHWEIZ.ORG a/k/a
LOUISVUITTONSZUIRICH.ORG a/k/a PREZZI-LVBORSE.ORG,
CEINTUREFR.CN, COOLFASHION.ASIA a/k/a
COOLSTYLEGIFTS.COM a/k/a FACTORYOUTLETSHOP.BIZ a/k/a
FASHIONSTYLEJP.COM a/k/a FASHIONT-SHIRTSSTORE.BIZ a/k/a
FASHIONT-SHIRTSSTORE.COM a/k/a FASHIONVIPEU.COM a/k/a
FASHIONWEARASIA.COM a/k/a FORYOUOUTLET.COM a/k/a
FORYOUSTREET.COM a/k/a HIGH-ENDCLOTHING.BIZ a/k/a
HIGH-ENDCLOTHING.COM a/k/a HIGH-ENDCLOTHING.SHOP
a/k/a HIGH-ENDCLOTHING.STORE a/k/a HIGH-ENDSTYLE.SHOP
a/k/a HOODIESMODE.COM a/k/a MODEBESTSTYLE.STORE a/k/a
OUTLETVIPEU.COM a/k/a SKATEBOARD SERIES.BIZ a/k/a
STREETGUIDE.STORE a/k/a STREETVIP.BIZ a/k/a
STREETWEARJP.COM a/k/a STREETWEAR-OFFICIAL.COM a/k/a
SUP2018.STORE a/k/a SUP-CLOTHINGONLINE.COM a/k/a
SUPCLUBJP.STORE a/k/a SUPCOLLECTION.BIZ a/k/a
SUPJPSTORE.COM a/k/a SUPNIHON.BIZ a/k/a SUPOUTLETS.COM
a/k/a SUPREME18SSJP.STORE a/k/a SUPREME18SS-STORE.COM
a/k/a SUPREMECLOTHING.BIZ a/k/a SUPREMECLOTHJP.COM
a/k/a SUPREMECLUB.BIZ a/k/a SUPREMECOLLECTION.BIZ a/k/a
SUPREME-COLLECTION.COM a/k/a SUPREMECOOLSTYLE.COM
a/k/a SUPREMEEUNEW.COM a/k/a SUPREMEHOODIES.COM a/k/a
SUPREMEINASIA.COM a/k/a SUPREMEINJAPAN.COM a/k/a
SUPREMEJAPANSTYLE.COM a/k/a SUPREMEJPFASHION.COM
a/k/a SUPREMEJPHOME.COM a/k/a SUPREMEJPWEAR.COM a/k/a
SUPREMEMARKET.BIZ a/k/a SUPREMENEWSTYLE.COM a/k/a
SUPREME-OFFICIAL.COM a/k/a SUPREME-OFFICIALONLINE.BIZ
a/k/a SUPREME-ONLINE.ASIA a/k/a SUPREME-ONLINE.BIZ a/k/a
SUPREME-ONLINEJP.BIZ a/k/a SUPREMEONLINENY.COM a/k/a

SUPREME-ONLINE.SALE.COM a/k/a SUPREMEOUTLET.STYLE
a/k/a SUPREME-OUTLETS.ONLINE a/k/a SUPREME-
OUTLETS.HOP.COM a/k/a SUPREME-OUTLETS.HOP.ONLINE a/k/a
SUPREMES-JP.STORE a/k/a SUPREMES-ONLINE.COM a/k/a
SUPREMES-OUTLET.ONLINE a/k/a SUPREMESTREET.ONLINE
a/k/a SUPREMEUKVIP.COM a/k/a SUPREMEVIPUK.COM a/k/a
SUPREMEXMASJP.COM a/k/a SUPS.STORE a/k/a
SUPSTOREJP.COM a/k/a SUPSTYLE.STORE a/k/a SUPWAY.STORE
a/k/a SURPREMEONLINE.COM a/k/a YOURHOODIES.STORE a/k/a
YOURMODETSHIRT.STORE, DRMARTENS-OUTLET.COM,
FAKEBAGSALES.COM a/k/a FAKESSALE.COM a/k/a
HANDBAGWHOLESALESHOP.COM a/k/a
REPLICAFAHIONTEAM.COM a/k/a
REPLICAHANDBAGSPAYMENT.COM a/k/a
REPLICALUXURYHANDBAGES.COM a/k/a
REPLICASPRODUCTS.COM a/k/a REPLICASTORES.ALE.COM a/k/a
RIGHTIMITATIONPURSES.COM, FASHIONBIBLE.CO,
GRENIERLALLIER.COM, KABELKYPR.AHA.CN a/k/a
LOUISVUITTONSUISSEOUTLET.CN a/k/a
VUITTONTASKERUDS.ALG.CN, LECAPITAINEBERNIER.COM,
LOUISVUITTONBAG.SITE, LUXURYSTOREX.COM,
LVBAGSUSD.COM, LVKOPI-SS.COM,
REPLICALOUISVUITTON.COM a/k/a TONTHIS.COM,
SAOBM.CO.UK, SWISSPITERWATCH.COM,
USLOUISVUITTON.CO, and VUITTONOUTLETSVERIGE.COM,
each an Individual, Partnership, Business Entity, or Unincorporated
Association,

Defendants.

COMPLAINT FOR INJUNCTIVE RELIEF AND DAMAGES

Plaintiff, Louis Vuitton Malletier (“Louis Vuitton”) hereby sues Defendants, the individuals, partnerships, business entities, or unincorporated associations identified above and on Schedule “A” hereto (collectively “Defendants”). Defendants are promoting, selling, offering for sale and distributing goods bearing counterfeits and confusingly similar imitations of Louis Vuitton’s trademarks within this district through at least the fully interactive commercial Internet websites operating under the domain names identified on Schedule “A” hereto (the “Subject Domain Names”). In support of its claims, Louis Vuitton alleges as follows:

JURISDICTION AND VENUE

1. This is an action for federal trademark counterfeiting and infringement, false designation of origin, cybersquatting, common law unfair competition, and common law trademark infringement, pursuant to 15 U.S.C. §§ 1114, 1116, 1125(a), 1125(d), and The All Writs Act, 28 U.S.C §1651(a). Accordingly, this Court has subject matter jurisdiction over this action pursuant to 15 U.S.C. § 1121 and 28 U.S.C. §§ 1331 and 1338. This Court has supplemental jurisdiction pursuant to 28 U.S.C. § 1367 over Louis Vuitton's state law claims because those claims are so related to the federal claims that they form part of the same case or controversy.

2. Defendants are subject to personal jurisdiction in this district because they operate commercial websites accessible in this district and conduct business by registering and maintaining commercial Subject Domain Names registered within the United States and/or direct business activities towards consumers throughout the United States, including within the State of Florida and this district through at least the fully interactive¹ commercial Internet websites operating under the Subject Domain Names.

3. Venue is proper in this Court pursuant to 28 U.S.C. § 1391 since Defendants are, upon information and belief, engaged in infringing activities and causing harm within this district by advertising, offering to sell and/or selling infringing products into this district.

¹ Defendant replicalouisvuitton.com (Defendant 19) uses its Subject Domain Name, tonthis.com, to act as supporting domain name to direct traffic to its fully-interactive, commercial website operating under the Subject Domain Name, replicalouisvuitton.com, from which consumers can complete purchases. The supporting domain name, replicalouisvuitton.com, when accessed directly, appears to be blog style website; however, when visited from a search engine such as Google, visitors are redirected to the fully-interactive website operating under the Subject Domain Name, tonthis.com.

THE PLAINTIFF

4. Louis Vuitton is a foreign business entity organized under the laws of the Republic of France with its principal place of business located at 2, rue du Pont-Neuf in Paris, France 75034. Louis Vuitton operates boutiques throughout the world, including within this district. Louis Vuitton is, in part, engaged in the business of manufacturing and distributing throughout the world, including within this district, a variety of high quality luxury goods under multiple world famous common law and federally registered trademarks, including those identified in Schedule “B” hereto. Louis Vuitton offers for sale and sells its trademarked goods within the State of Florida, including this district, through its boutiques, and online retail website. Defendants, through the advertising, offering for sale, and sale of counterfeit and infringing Louis Vuitton branded products, are directly, and unfairly, competing with Louis Vuitton’s economic interests in the State of Florida and causing Louis Vuitton harm within this jurisdiction.

5. Like many other famous trademark owners in the luxury goods market, Louis Vuitton suffers ongoing daily and sustained violations of its trademark rights at the hands of counterfeiters and infringers, such as Defendants herein, who wrongfully reproduce and counterfeit Louis Vuitton’s trademarks for the twin purposes of (i) duping and confusing the consuming public and (ii) earning substantial profits.

6. In order to combat the indivisible harm caused by the combined actions of Defendants and others engaging in similar conduct, each year Louis Vuitton expends significant resources in connection with trademark enforcement efforts, including legal fees, investigative fees, and support mechanisms for law enforcement, such as field training guides and seminars. The exponential growth of counterfeiting over the Internet has created an environment that

requires Louis Vuitton to file a number of lawsuits, often it later turns out, against the same individuals and groups, in order to protect both consumers and itself from the ill effects of confusion and the erosion of the goodwill connected to the Louis Vuitton brand.

THE DEFENDANTS

7. Defendants all operate through domain names registered in the United States via the domain registrar GoDaddy and are comprised of individuals and/or business entities of unknown makeup, whom, upon information and belief, reside and/or operate in foreign jurisdictions, including the People's Republic of China. Defendants have the capacity to be sued pursuant to Federal Rule of Civil Procedure 17(b). Defendants direct their business activities towards consumers throughout the world, including the United States and within this district through the simultaneous operation of at least the fully interactive commercial Internet websites existing under the Subject Domain Names.

8. Upon information and belief, Defendants use aliases in conjunction with the operation of their businesses, including but not limited to those identified by the same Defendant Number on Schedule "A" hereto.

9. Upon information and belief, Defendants are directly and personally contributing to, inducing and engaging in the sale of counterfeit branded products as alleged herein, often times as partners, co-conspirators and/or suppliers.

10. Defendants are part of an ongoing scheme to create and maintain an illegal marketplace enterprise on the World Wide Web, which (i) confuses consumers regarding the source of Defendants' goods for profit, and (ii) expands the marketplace for illegal, counterfeit Louis Vuitton branded goods while shrinking the legitimate marketplace for genuine Louis Vuitton branded goods. The natural and intended byproduct of Defendants' actions is the

erosion and destruction of the goodwill associated with the Louis Vuitton's famous name and associated trademarks, as well as the destruction of the legitimate market sector in which Louis Vuitton operates.

11. Defendants are the past and present controlling forces behind the operation of the Internet websites operating under at least the Subject Domain Names.

12. Upon information and belief, Defendants directly engage in unfair competition with Louis Vuitton by (i) advertising, offering for sale and/or selling goods bearing counterfeits and infringements of one or more of Louis Vuitton's trademarks to consumers within the United States and this district through at least the commercial websites operating under the Subject Domain Names, and any additional domains and websites not yet known to Louis Vuitton and (ii) creating and maintaining an illegal marketplace enterprise for the purpose of diverting business from Louis Vuitton's legitimate marketplace for its genuine goods. Defendants have purposefully directed some portion of their illegal activities towards consumers in the State of Florida through the advertisement, offer to sell, sale and/or shipment of counterfeit Louis Vuitton branded goods into the State and by operating an illegal marketplace enterprise which impacts and interferes with commerce throughout the United States, including within the State of Florida.

13. Upon information and belief, Defendants have registered, established or purchased, and maintained their respective Subject Domain Names, and the websites operating thereunder. Upon information and belief, many Defendants have engaged in fraudulent conduct with respect to the registration of the Subject Domain Names by providing false and/or misleading information to their various registrars during the registration or maintenance process. Upon information and belief, Defendants have registered and/or maintained their Subject Domain Names for the sole purpose of engaging in illegal counterfeiting activities.

14. Upon information and belief, Defendants will continue to register or acquire new domain names for the purpose of selling and/or offering for sale goods bearing counterfeit and confusingly similar imitations of one or more of Louis Vuitton's trademarks unless preliminarily and permanently enjoined. Moreover, upon information and belief, Defendants will continue to maintain and grow their illegal marketplace enterprise at Louis Vuitton's expense unless preliminarily and permanently enjoined.

15. Defendants' entire Internet-based website businesses amount to nothing more than illegal operations established and operated in order to infringe the intellectual property rights of Louis Vuitton and others.

16. Defendants' business names, i.e., the Subject Domain Names and any other domain names and aliases used in connection with the sale of counterfeits bearing Louis Vuitton's trademarks, are essential components of Defendants' counterfeiting and infringement activities and are one of the means by which Defendants further their counterfeiting and infringing scheme and cause harm to Louis Vuitton. Moreover, Defendants are using Louis Vuitton's famous name and trademarks to drive Internet consumer traffic to their websites operating under the Subject Domain Names, thereby creating and increasing the value of the Subject Domain Names and decreasing the size and value of Louis Vuitton's legitimate consumer marketplace at Louis Vuitton's expense.

COMMON FACTUAL ALLEGATIONS

Plaintiff's Trademark Rights

17. Louis Vuitton is the registered owner of the trademarks identified on Schedule "B" hereto (the "Louis Vuitton Marks") which are valid and registered on the Principal Register of the United States Patent and Trademark Office. The Louis Vuitton Marks are used in

conjunction with the manufacture and distribution of quality goods in the categories identified on Schedule “B.” True and correct copies of the Certificates of Registration for the Louis Vuitton Marks are attached hereto as Composite Exhibit “1.”

18. Long before the Defendants began their infringing activities complained of herein, the Louis Vuitton Marks have been used by Louis Vuitton in interstate commerce to identify and distinguish Louis Vuitton’s high quality goods for an extended period of time.

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

20. The Louis Vuitton Marks are symbols of Louis Vuitton’s quality, reputation and goodwill. Louis Vuitton has continuously used the Louis Vuitton Marks since registration.

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

22. Louis Vuitton has extensively used, advertised, and promoted the Louis Vuitton Marks in the United States in association with the sale of high quality luxury goods and has carefully monitored and policed the use of the Louis Vuitton Marks.

23. As a result of Louis Vuitton’s efforts, members of the consuming public readily identify merchandise bearing or sold under the Louis Vuitton Marks as being high quality goods sponsored and approved by Louis Vuitton.

24. Accordingly, the Louis Vuitton Marks have achieved secondary meaning as identifiers of high quality luxury goods.

25. Genuine goods bearing the Louis Vuitton Marks are widely legitimately advertised, promoted, and sold by Louis Vuitton and its authorized distributors via the Internet.

Over the course of the past ten years, visibility on the Internet, particularly via Internet search engines such as Google, Yahoo! and Bing has become increasingly important to Louis Vuitton's overall marketing and consumer education efforts. Thus, Louis Vuitton expends significant monetary resources on Internet marketing and consumer education, including search engine optimization ("SEO") strategies. Those strategies allow Louis Vuitton and its authorized retailers to fairly and legitimately educate consumers about the value associated with the Louis Vuitton brand and the goods sold thereunder.

Defendants' Infringing Activities

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

27. Upon information and belief, Defendants are promoting and advertising, distributing, selling and/or offering for sale goods in interstate commerce using counterfeits and confusingly similar imitations of the Louis Vuitton Marks (the "Counterfeit Goods") through the fully interactive commercial Internet websites operating under the Subject Domain Names. True and correct copies of the web pages reflecting samples of the Internet websites operating under the Subject Domain Names displaying the Louis Vuitton branded items offered for sale are attached hereto as Composite Exhibit "2." Specifically, upon information and belief, Defendants are using identical copies of the Louis Vuitton Marks for different quality goods. Louis Vuitton has used the Louis Vuitton Marks extensively and continuously before Defendants began offering counterfeit and confusingly similar imitations of Louis Vuitton's merchandise.

28. Upon information and belief, Defendants' Counterfeit Goods are of a quality substantially different than that of Louis Vuitton's genuine goods. Defendants, upon information and belief, are actively using, promoting and otherwise advertising, distributing, selling, and/or offering for sale substantial quantities of their Counterfeit Goods with the knowledge and intent that such goods will be mistaken for the genuine high quality products offered for sale by Louis Vuitton despite Defendants' knowledge that they are without authority to use the Louis Vuitton Marks. The net effect of Defendants' actions will cause confusion of consumers at the time of initial interest, sale, and in the post-sale setting, who will believe Defendants' Counterfeit Goods are genuine goods originating from, associated with, and approved by Louis Vuitton.

29. Defendants advertise their products for sale to the consuming public via at least their websites operating under the Subject Domain Names. In so advertising these products, Defendants improperly and unlawfully use one or more of the Louis Vuitton Marks without Louis Vuitton's permission. Upon information and belief, the misappropriation of Louis Vuitton's advertising ideas in the form of the Louis Vuitton Marks is, in part, the proximate cause of harm to Louis Vuitton.

30. As part of their overall infringement and counterfeiting scheme, Defendants are, upon information and belief, concurrently employing and benefiting from substantially similar, and often times coordinated, advertising and SEO strategies based, in large measure, upon an illegal use of counterfeits and infringements of one or more of the Louis Vuitton Marks. Specifically, Defendants are, upon information and belief, using counterfeits and infringements of Louis Vuitton's famous name and the Louis Vuitton Marks in order to make their websites selling illegal goods appear more relevant and attractive to consumers searching for Louis Vuitton related goods and information online. By their actions, Defendants are contributing to

the creation and maintenance of an illegal marketplace operating in parallel to the legitimate marketplace for genuine Louis Vuitton goods. Defendants are causing, individual, concurrent and indivisible harm to Louis Vuitton and the consuming public by (i) depriving Louis Vuitton of its right to fairly compete for space within search engine results and reducing the visibility of Louis Vuitton's genuine goods on the World Wide Web, (ii) causing an overall degradation of the value of the goodwill associated with the Louis Vuitton Marks, (iii) increasing Louis Vuitton's overall cost to market its goods and educate consumers about its brand via the Internet, and/or (iv) maintaining an illegal marketplace enterprise which perpetuates the ability of Defendants and future entrants to that marketplace to confuse consumers and harm Louis Vuitton with impunity.

31. Upon information and belief, Defendants are concurrently conducting and directing their counterfeiting and infringing activities toward consumers and causing harm, within this district and elsewhere throughout the United States. As a result, Defendants are defrauding Louis Vuitton and the consuming public for Defendants' own benefit.

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

33. Defendants are engaging in the above-described illegal counterfeiting and infringing activities knowingly and intentionally or with reckless disregard or willful blindness to Louis Vuitton's rights for the purpose of trading on Louis Vuitton's goodwill and reputation. If Defendants' intentional counterfeiting and infringing activities are not preliminarily and permanently enjoined by this Court, Louis Vuitton and the consuming public will continue to be harmed.

34. Defendants' above-identified infringing activities are likely to cause confusion, deception and mistake in the minds of consumers before, during, and after the time of purchase. Moreover, Defendants' wrongful conduct is likely to create a false impression and deceive customers into believing there is a connection or association between Louis Vuitton's genuine goods and Defendants' Counterfeit Goods, which there is not.

35. Further, several Defendants have registered their respective Subject Domain Name(s), using marks that are nearly identical and/or confusingly similar to one or more of the Louis Vuitton Marks (collectively the "Cybersquatted Subject Domain Names").

36. Defendants do not have, nor have they ever had, the right or authority to use the Louis Vuitton Marks. Further, the Louis Vuitton Marks have never been assigned or licensed to be used on any of the websites operating under the Cybersquatted Subject Domain Names.

37. Upon information and belief, Defendants have provided false and/or misleading contact information when applying for the registration of the Cybersquatted Subject Domain Names, or have intentionally failed to maintain accurate contact information with respect to the registration of the Cybersquatted Subject Domain Names.

38. Upon information and belief, Defendants have never used any of the Cybersquatted Subject Domain Names in connection with a bona fide offering of goods or services.

39. Upon information and belief, Defendants have not made any bona fide non-commercial or fair use of the Louis Vuitton Marks on a website accessible under any of the Cybersquatted Subject Domain Names.

40. Upon information and belief, Defendants have intentionally incorporated the Louis Vuitton Marks in their Cybersquatted Subject Domain Names to divert consumers looking for Louis Vuitton's Internet website to their own Internet websites for commercial gain.

41. Given the visibility of Defendants' various websites and the similarity of their actions, it is clear Defendants are either related or, at a minimum, cannot help but know of each other's existence and the damage likely to be caused to Louis Vuitton and the overall consumer market in which it operates as a result of Defendants' concurrent actions.

42. Although some Defendants may be acting independently, they may properly be deemed to be acting in concert because the combined force of their actions serves to multiply the harm caused to Louis Vuitton.

43. Louis Vuitton has no adequate remedy at law.

44. Louis Vuitton is suffering irreparable injury and has suffered substantial damages as a result of Defendants' unauthorized and wrongful use of the Louis Vuitton Marks. If Defendants' counterfeiting and infringing, cybersquatting, and unfairly competitive activities, and their illegal marketplace enterprise, are not preliminarily and permanently enjoined by this Court, Louis Vuitton and the consuming public will continue to be harmed.

45. The harm and damage sustained by Louis Vuitton have been directly and proximately caused by Defendants' wrongful reproduction, use, advertisement, promotion, offers to sell, and sale of their Counterfeit Goods and by the creation, maintenance and very existence of Defendants' illegal marketplace enterprise.

**COUNT I - TRADEMARK COUNTERFEITING AND INFRINGEMENT
PURSUANT TO § 32 OF THE LANHAM ACT (15 U.S.C. § 1114)**

46. Louis Vuitton hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 45 above.

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

48. Specifically, Defendants are promoting and otherwise advertising, selling, offering for sale and distributing products bearing one or more of the Louis Vuitton Marks. Defendants are continuously infringing and inducing others to infringe the Louis Vuitton Marks by using them to advertise, promote, sell and/or offer to sell goods bearing the Louis Vuitton Marks.

49. Defendants' concurrent counterfeiting and infringing activities are likely to cause and actually are causing confusion, mistake and deception among members of the trade and the general consuming public as to the origin and quality of Defendants' Counterfeit Goods.

50. Defendants' unlawful actions have caused and are continuing to cause unquantifiable damage and irreparable harm to Louis Vuitton and are unjustly enriching Defendants at Louis Vuitton's expense.

51. Defendants' above-described illegal actions constitute counterfeiting and infringement of the Louis Vuitton Marks in violation of Louis Vuitton's rights under § 32 of the Lanham Act, 15 U.S.C. § 1114.

52. Louis Vuitton has suffered and will continue to suffer irreparable injury due to Defendants' above described activities if Defendants are not preliminarily and permanently enjoined.

COUNT II - FALSE DESIGNATION OF ORIGIN
PURSUANT TO § 43(a) OF THE LANHAM ACT (15 U.S.C. § 1125(a))

53. Louis Vuitton hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 45 above.

54. Defendants' Counterfeit Goods bearing and sold under copies of one or more of the Louis Vuitton Marks have been widely advertised and offered for sale throughout the United States.

55. Defendants' Counterfeit Goods bearing and sold under copies of one or more of the Louis Vuitton Marks are virtually identical in appearance to each of Louis Vuitton's genuine goods. However, Defendants' Counterfeit Goods are different in quality. Accordingly, Defendants' activities are likely to cause confusion in the trade and among the general public as to at least the origin or sponsorship of their Counterfeit Goods.

56. Defendants, upon information and belief, have used in connection with their advertisement, offer for sale, and sale of the Counterfeit Goods, false designations of origin and false descriptions and representations, including words or other symbols and trade dress which tend to falsely describe or represent such goods and have caused such goods to enter into commerce with full knowledge of the falsity of such designations of origin and such descriptions and representations, all to Louis Vuitton's detriment

57. Defendants have authorized infringing uses of one or more of the Louis Vuitton Marks, in Defendants' advertisement and promotion of their counterfeit and infringing branded products. Defendants have also misrepresented to members of the consuming public that the Counterfeit Goods being advertised and sold by them are genuine, non-infringing goods.

58. Additionally, many Defendants are using counterfeits and infringements of one or more of the Louis Vuitton Marks in order to unfairly compete with Louis Vuitton and others for space within search engine organic results, thereby jointly depriving Louis Vuitton of a valuable

marketing and educational tool which would otherwise be available to Louis Vuitton, and reducing the visibility of Louis Vuitton's genuine goods on the World Wide Web.

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

60. Louis Vuitton has no adequate remedy at law and has sustained indivisible injury and damage caused by Defendants' concurrent conduct. Absent an entry of an injunction by this Court, Louis Vuitton will continue to suffer irreparable injury to its goodwill and business reputation as well as monetary damages.

**COUNT III - CLAIM FOR RELIEF FOR CYBERSQUATTING
PURSUANT TO §43(d) OF THE LANHAM ACT (15 U.S.C. §1125(d))**

61. Louis Vuitton hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 45 above.

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

63. Upon information and belief, certain Defendants have acted with the bad faith intent to profit from the Louis Vuitton Marks and the goodwill associated with the Louis Vuitton Marks by registering and using the Cybersquatted Subject Domain Names.

64. The Louis Vuitton Marks were distinctive and famous at the time the relevant Defendants registered the Cybersquatted Subject Domain Names.

65. Defendants have no intellectual property rights in or to the Louis Vuitton Marks.

66. The Cybersquatted Subject Domain Names are identical to, confusingly similar to, or dilutive of one or more of the Louis Vuitton Marks.

67. Defendants' conduct is done with knowledge and constitutes a willful violation of Louis Vuitton's rights in the Louis Vuitton Marks. At a minimum, Defendants' conduct constitutes reckless disregard for and willful blindness to Louis Vuitton's rights.

68. Louis Vuitton has no adequate remedy at law.

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

70. Louis Vuitton has suffered and will continue to suffer irreparable injury due to the above described activities of Defendants if Defendants are not enjoined.

COUNT IV - COMMON LAW UNFAIR COMPETITION

71. Louis Vuitton hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 45 above.

72. This is an action against Defendants based on their (i) promotion, advertisement, distribution, sale and/or offering for sale of goods using marks which are virtually identical, both visually and phonetically, to the Louis Vuitton Marks, and (ii) creation and maintenance of an illegal, ongoing marketplace enterprise operating in parallel to the legitimate marketplace in which Louis Vuitton sells its genuine goods, in violation of Florida's common law of unfair competition.

73. Specifically, Defendants are promoting and otherwise advertising, selling, offering for sale and distributing infringing and counterfeit Louis Vuitton branded goods. Defendants are also using counterfeits and infringements of one or more of the Louis Vuitton Marks to unfairly compete with Louis Vuitton for (i) space in search engine results across an array of search terms and/or (ii) visibility on the World Wide Web.

74. Defendants' infringing activities are likely to cause and actually are causing confusion, mistake and deception among members of the consuming public as to the origin and quality of Defendants' products by their use of the Louis Vuitton Marks.

75. Louis Vuitton has no adequate remedy at law and is suffering irreparable injury and damages as a result of Defendants' actions.

COUNT V - COMMON LAW TRADEMARK INFRINGEMENT

76. Louis Vuitton hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 45 above.

77. This is an action for common law trademark infringement against Defendants based on their promotion, advertisement, offering for sale, and sale of their Counterfeit Goods bearing the Louis Vuitton Marks. Louis Vuitton is the owner of all common law rights in and to the Louis Vuitton Marks.

78. Specifically, Defendants, upon information and belief, are promoting and otherwise advertising, distributing, offering for sale, and selling goods bearing infringements of one or more of the Louis Vuitton Marks.

79. Defendants' infringing activities are likely to cause and actually are causing confusion, mistake and deception among members of the trade and the general consuming public as to the origin and quality of Defendants' Counterfeit Goods bearing the Louis Vuitton Marks.

80. Louis Vuitton has no adequate remedy at law and is suffering irreparable injury and damages as a result of Defendants' actions

PRAYER FOR RELIEF

81. WHEREFORE, Louis Vuitton demands judgment on all Counts of this Complaint and an award of equitable relief and monetary relief against Defendants as follows:

a. Entry of a temporary restraining order, as well as preliminary and permanent injunctions pursuant to 15 U.S.C. § 1116 and Federal Rule of Civil Procedure 65, enjoining Defendants, their agents, representatives, servants, employees, and all those acting in concert or participation therewith, from manufacturing or causing to be manufactured, importing, advertising or promoting, distributing, selling or offering to sell their Counterfeit Goods; from infringing, counterfeiting, or diluting the Louis Vuitton Marks; from using the Louis Vuitton Marks, or any mark or trade dress similar thereto, in connection with the sale of any unauthorized goods; from using any logo, trade name, trademark or trade dress that may be calculated to falsely advertise the services or products of Defendants as being sponsored by, authorized by, endorsed by, or in any way associated with Louis Vuitton; from falsely representing themselves as being connected with Louis Vuitton, through sponsorship or association, or engaging in any act that is likely to falsely cause members of the trade and/or of the purchasing public to believe any goods or services of Defendants are in any way endorsed by, approved by, and/or associated with Louis Vuitton; from using any reproduction, counterfeit, infringement, copy, or colorable imitation of the Louis Vuitton Marks in connection with the publicity, promotion, sale, or advertising of any goods sold by Defendants; from affixing, applying, annexing or using in connection with the sale of any goods, a false description or representation, including words or other symbols tending to falsely describe or represent Defendants' goods as being those of Louis Vuitton, or in any way endorsed by Louis Vuitton and from offering such goods in commerce; from engaging in search engine optimization strategies using colorable imitations of the Louis Vuitton name or the Louis Vuitton Marks; and from otherwise unfairly competing with Louis Vuitton.

b. Entry of a temporary restraining order, as well as preliminary and permanent injunctions pursuant to 28 U.S.C § 1651(a), The All Writs Act, enjoining Defendants and all third parties with actual notice of the injunction from participating in, including providing financial services, technical services or other support to, the Defendants in connection with the sale and distribution of non-genuine goods bearing counterfeits of the Louis Vuitton Marks.

c. Entry of an order that, upon Louis Vuitton's request, those acting in concert or participation with Defendants who have notice of the injunction, as service providers cease hosting, facilitating access to, or providing any supporting service to any and all domain names, including but not limited to the Subject Domain Names, and websites through which Defendants engage in the promotion, offering for sale and/or sale of goods using counterfeits and/or infringements of the Louis Vuitton Marks.

d. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act and the Court's inherent authority, that upon Louis Vuitton's request, the top level domain (TLD) Registry for each of the Subject Domain Names, and any other domains used by Defendants, or their administrators, including backend registry operators or administrators, place the Subject Domain Names on Registry Hold status for the remainder of the registration period for any such domain name, thus removing them from the TLD zone files which link the Subject Domain Names to the IP addresses where the associated websites are hosted.

e. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act and the Court's inherent authority, canceling for the life of the current registration or, at Louis Vuitton's election, transferring the Subject Domain Names and any other domain names used by Defendants to engage in their counterfeiting of the Louis Vuitton Marks at issue to Louis Vuitton's control so they may no longer be used for illegal purposes.

f. Entry of an order requiring Defendants, their agent(s) or assign(s), to assign all rights, title, and interest, to their Subject Domain Name(s) to Louis Vuitton and, if within five (5) days of entry of such order Defendants fail to make such an assignment, the Court order the act to be done by another person appointed by the Court at Defendants' expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a).

g. Entry of an order requiring Defendants, their agent(s) or assign(s), to instruct all search engines to permanently delist or deindex the Subject Domain Name(s) and, if within five (5) days of entry of such order Defendants fail to make such a written instruction, the Court order the act to be done by another person appointed by the Court at Defendants' expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a).

h. Entry of an order requiring Defendants to account to and pay Louis Vuitton for all profits and damages resulting from Defendants' trademark counterfeiting and infringing activities and that the award to Louis Vuitton be trebled, as provided for under 15 U.S.C. §1117, or, at Louis Vuitton's election with respect to Count I, that Louis Vuitton be awarded statutory damages from each Defendant in the amount of two million dollars (\$2,000,000.00) per each counterfeit trademark used and product sold, as provided by 15 U.S.C. §1117(c)(2) of the Lanham Act.

i. Entry of an order requiring the relevant Defendants to account to and pay Louis Vuitton for all profits and damages resulting from those Defendants' cybersquatting activities and that the award to Louis Vuitton be trebled, as provided for under 15 U.S.C. §1117, or, at Louis Vuitton's election with respect to Count III, that Louis Vuitton be awarded statutory damages from the relevant Defendants in the amount of one hundred thousand dollars

(\$100,000.00) per cybersquatted domain name used as provided by 15 U.S.C. §1117(d) of the Lanham Act.

j. Entry of an award pursuant to 15 U.S.C. § 1117 (a) and (b) of Louis Vuitton's costs and reasonable attorneys' fees and investigative fees associated with bringing this action.

k. Entry of an award of pre-judgment interest on the judgment amount.

l. Entry of an order for any further relief as the Court may deem just and proper.

DATED: October 2, 2018.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: s:/Stephen M. Gaffigan/

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SCHEDULE A
DEFENDANTS BY NUMBER AND SUBJECT DOMAIN NAME





Defendant Number	Defendant / Subject Domain Name
1	aaaimitationbags.com
1	aaareplicashops.com
1	fashionfakeseason.com
2	atoreplicahandbags.com
2	buycheapreplicahandbags.com
2	fakesbagshop.com
2	foreverreplicapurse.com
2	handbagfakes.com
2	replicabags99.com
2	replicasales.com
2	shoppingcheaps.com
3	bagbeltshop.com
4	bagsfreesale.com
5	beltsoutlet.cn
6	bolsos-tiendaes.org
6	borselouis-vuittonsit.org
6	louissvuitton-taschens.org
6	louis-vuittonsschweiz.org
6	louisvuittonszuirich.org
6	prezzi-lvborse.org
7	ceinturefr.cn
8	coolfashion.asia
8	coolstylegifts.com
8	factoryoutletshop.biz
8	fashionstylejp.com
8	fashiont-shirtsstore.biz
8	fashiont-shirtsstore.com
8	fashionvipeu.com
8	fashionwearasia.com
8	foryououtlet.com
8	foryoustreet.com
8	high-endclothing.biz
8	high-endclothing.com
8	high-endclothing.shop
8	high-endclothing.store




8	high-endstyle.shop
8	hoodiesmode.com
8	modebeststyle.store
8	outletvipeu.com
8	skateboardseries.biz
8	streetguide.store
8	streetvip.biz
8	streetwearjp.com
8	streetwear-official.com
8	sup2018.store
8	sup-clothingonline.com
8	supclubjp.store
8	supcollection.biz
8	supjpstore.com
8	supnihon.biz
8	supoutlets.com
8	supreme18ssjp.store
8	supreme18ss-store.com
8	supremeclothing.biz
8	supremeclothjp.com
8	supremeclub.biz
8	supremecollection.biz
8	supreme-collection.com
8	supremecoolstyle.com
8	supremeeunew.com
8	supremehoodies.com
8	supremeinasia.com
8	supremeinjapan.com
8	supremejapanstyle.com
8	supremejpfashion.com
8	supremejphome.com
8	supremejpwear.com
8	suprememarket.biz
8	supremenewstyle.com
8	supreme-official.com
8	supreme-officialonline.biz
8	supreme-online.asia
8	supreme-online.biz
8	supreme-onlinejp.biz
8	supremeonlineny.com



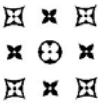
8	supreme-onlinesale.com
8	supremeoutlet.style
8	supreme-outlets.online
8	supreme-outletshop.com
8	supreme-outletshop.online
8	supremes-jp.store
8	supremes-online.com
8	supremes-outlet.online
8	supremestreet.online
8	supremeukvip.com
8	supremevipuk.com
8	supremexmasjp.com
8	sups.store
8	supstorejp.com
8	supstyle.store
8	supway.store
8	surpremeonline.com
8	yourhoodies.store
8	yourmodetshirt.store
9	drmartens-outlet.com
10	fakebagsales.com
10	fakessale.com
10	handbagwholesaleshop.com
10	replicafashionteam.com
10	replicahandbagspayment.com
10	repicaluxuryhandbags.com
10	replicasproducts.com
10	replicastoresale.com
10	rightimitationpurses.com
11	fashionbible.co
12	grenierlallier.com
13	kabelkypraha.cn
13	louisvuittonsuisseoutlet.cn
13	vuittontaskerudsalg.cn
14	lecapitainebernier.com
15	louisvuittonbag.site
16	luxurystorex.com
17	lvbagsusd.com
18	lvkopi-ss.com
19	repicalouisvuitton.com


19	tonthis.com
20	saobm.co.uk
21	swisspiterwatch.com
22	uslouisvuitton.co
23	vuittonoutletsverige.com

SCHEDULE "B"
LOUIS VUITTON'S FEDERALLY REGISTERED TRADEMARKS


Trademark	Registration Number	Registration Date	Class(es) / Relevant Goods
	0,297,594	September 20, 1932	IC 18: trunks, valises, traveling bags, satchels, hat boxes and shoe boxes used for luggage, hand bags, and pocketbooks.
LOUIS VUITTON	1,045,932	August 10, 1976	IC 18: luggage and ladies' handbags.
	1,519,828	January 10, 1989	IC 18: trunks, valises, traveling bags, satchels, hat boxes and shoe boxes used for luggage, hand bags, pocketbooks.
	1,794,905	September 28, 1993	IC 16: stationery, pads of stationery, calendars, indexes for articles made for travellers, notebooks, envelopes; writing paper, office requisites in the nature of writing pads, pencil holders, pen cases, pencil cases, nibs, nibs of gold, inkwells, inkstands. IC 25: clothing for men and women; namely belts, shawls, sashes, scarves; footwear headgear.
	1,938,808	November 28, 1995	IC 14: jewelry, watches and straps for wrist watches. IC 24: travel blankets made of textile.
LOUIS VUITTON	1,990,760	August 6, 1996	IC 14: watches and straps for wrist watches. IC 16: catalogues featuring luggage and travel accessories, bags, small leather goods, and garments; notebooks, anthologies, and pamphlets referring to travel; calendars; telephone indexes; fountain pens, ballpoint pens, nibs, covers for pocket and desk diaries, and checkbook holders. IC 18: trunks; traveling trunks; suitcases; traveling bags; luggage; garment bags for travel; hat boxes for travel; shoe bags for travel; umbrellas; animal carriers; rucksacks; haversacks; leather or textile shopping bags; beach bags; handbags; vanity cases sold empty; attache cases; tote bags, travel satchels; clutch bags; briefcases; wallets; pocket wallets; credit card cases; business card cases; bill and card holders; checkbook holders; key cases; change purses; briefcase-type portfolios. IC 24: travel blankets IC 25: shirts; sweatshirts; polo shirts; T-shirts; headwear; jackets; ties; belts; shawls; scarves.

	2,177,828	August 4, 1998	<p>IC 14: goods made of precious metals, namely, shoe ornaments, ornamental pins; jewelry, namely, rings, ear rings, cufflinks, bracelets, charms, necklaces; horological instruments, straps for watches, watches and wrist-watches, and cases for watches.</p> <p>IC 18: goods made of leather or imitations of leather are not included in other classes, namely, boxes made from leather; trunks, valises, traveling bags, luggage for travel, garment bags for travel, vanity cases sold empty, rucksacks, hand bags, beach bags, shopping bags, shoulder bags, attache cases, briefcases, and fine leather goods, namely, pocket wallets, purses, leather key holders, business card cases, calling card cases, and credit card cases, umbrellas.</p> <p>IC 25: clothing and underwear, namely, shirts, waistcoats, raincoats, skirts, coats, pullovers, trousers, dresses, jackets, shawls, stoles, scarves, neckties, pocket squares, belts, shoes, boots, and sandals.</p>
	2,181,753	August 18, 1998	<p>IC 14: jewelry, namely, rings, ear rings, bracelets, charms, necklaces, horological instruments, straps for watches, watches, and wrist-watches, and cases for watches.</p> <p>IC 18: goods made of leather or imitations of leather are not included in other classes, namely, boxes made from leather; trunks, valises, traveling bags, luggage for travel, garment bags for travel, vanity cases sold empty, rucksacks, hand bags, beach bags, shopping bags, shoulder bags, attache cases, briefcases, and fine leather goods, namely, pocket wallets, purses, leather key holders, business card cases, calling card cases, credit card cases, and umbrellas.</p> <p>IC 25: clothing and underwear, namely, shirts, waistcoats, raincoats, skirts, coats, pullovers, trousers, dresses, jackets, shawls, stoles, scarves, neckties, pocket squares, belts, shoes, boots, and sandals.</p>
	2,361,695	June 27, 2000	<p>IC 25: Clothing, namely, sweaters, shirts, sweatshirts, polo shirts, t-shirts, suits, waistcoats, raincoats, skirts, coats, pullovers, trousers, dresses, jackets, shawls, stoles, scarves, neckties, pocket squares, pocket handkerchief squares for wear, gloves, ties, belts, bathing suits, shoes, boots and sandals, and hats.</p>

 LOUIS VUITTON PARIS	2,378,388	August 22, 2000	IC 18: goods made of leather or imitations of leather not included in other classes, namely, boxes of leather principally used for travel purposes, trunks, valises, traveling bags, * traveling sets for containing cosmetics and jewelry, * handbags, beach bags, shopping bags, shoulder bags, brief cases, pouches, fine leather goods namely, pocket wallets, purses, key cases, business card cases, credit card cases.
	2,773,107	October 14, 2003	<p>IC 14: jewelry including rings, earrings, cuff links, bracelets, charms, necklaces, and medallions; horological and chronometric instruments and apparatus, namely, watches,</p> <p>IC 18: travel bags, travel bags made of leather; luggage trunks and valises, garment bags for travel, vanity-cases sold empty; rucksacks, shoulder bags, handbags; attache-cases, briefcases, drawstring pouches, pocket wallets, purses, umbrellas, business card cases made of leather or of imitation leather, credit card cases made of leather or of imitation leather; key holders made of leather or of imitation leather.</p> <p>IC 25: clothing, namely, shirts, T-shirts, belts, scarves, neck ties, shawls, skirts, raincoats, overcoats, trousers, jeans, pullovers, frocks, highheeled shoes, low-heeled shoes, boots, tennis shoes; hats</p>
	3,107,072	June 20, 2006	<p>IC 09: spectacles, sunglasses and spectacle cases.</p> <p>IC 14: jewelry, namely, rings, earrings and ear clips, cuff links, bracelets, charms, necklaces, tie pins, medallions; horological and chronometric apparatus and instruments, namely, watches, watch cases, alarm clocks; jewelry boxes of precious metal, their alloys or coated therewith.</p> <p>IC 18: leather and imitation leather products, namely, traveling bags, traveling sets comprised of bags or luggage, trunks and suitcases, garment bags for travel purposes; vanity cases sold empty, rucksacks, shoulder bags, handbags, attaché cases, document wallets and briefcases made of leather, pouches made of leather, wallets, purses, key cases, business card cases, credit card cases; umbrellas.</p> <p>IC 25: clothing and undergarments, namely, shirts, tee-shirts, belts, scarves, neckties, shawls, skirts, raincoats, overcoats, trousers, denim trousers, dresses, jackets, sashes for wear, bathing suits, shoes, boots.</p>

	4,192,541	August 21, 2012	<p>IC 03: soaps for personal use; perfumery; essential oils; cosmetics; creams for the hair, face, and body; lotions for the hair, face, and body; shower and bath gels; shower and bath preparations; shampoos; make-up preparations, namely, foundations, lipsticks, eye shadows, mascara, make-up powder, and nail polish.</p> <p>IC 09: sunglasses; spectacles; optical lenses; spectacle cases; telephones; mobile telephones; smart phones; PC tablets; personal digital assistants; MP3 players; accessories for telephones, mobile telephones, smart phones, PC tablets, personal digital assistants, and MP3 players, namely, hands-free kits for telephones, batteries, covers, housings, façades, chargers, hand straps, and neck straps.</p> <p>IC 14: jewelry; key rings of precious metal; tie pins; medallions; jewelry boxes; watches; watch bands; alarm clocks; cases for timepieces.</p> <p>IC 16: printed matter, namely, pamphlets, catalogs, and books in the field of travel, luggage, luxury goods, fashion, clothing, sports, the arts; publications, namely, brochures and booklets in the field of travel, luggage, luxury goods, fashion, clothing, sports, the arts; stationery; stationery articles, namely, note pads, writing books, drawing books, calendars, agendas, notebooks, envelopes, letter paper, and index cards; covers for diaries, indexes, and pads; office requisites, namely, letter trays, paper cutters, pencils, inkstands, inkwells, paperweights, pencil holders, pen holders, writing pads, pens, balls, and nibs for pens; postcards; paper labels; newspapers; printed documents, namely, printed certificates.</p> <p>IC 18: boxes of leather or imitation leather for packaging and carrying goods; traveling bags; leather traveling sets of luggage; trunks; suitcases; garment bags for travel; vanity cases sold empty; toiletry bags sold empty; backpacks; handbags; attaché cases; leather document cases; wallets; purses; leather key cases; umbrellas.</p> <p>IC 24: textiles and textile goods, namely, bath linen, bed linen, table linen, towels, bed covers, textile table cloths.</p> <p>IC 25: clothing, namely, underwear, shirts, tee-shirts, pullovers, skirts, dresses, trousers, coats, jackets, belts for clothing, scarves, sashes for wear, gloves, neckties, socks, bathing suits; footwear; headwear.</p>
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			IC 34: cigar and cigarette cases of leather and imitation leather.
LOUIS VUITTON	4,530,921	May 13, 2014	<p>IC 09: optical apparatus, namely, binoculars; blank USB sticks; spectacles; sunglasses; spectacle frames; spectacle glasses; spectacle cases; accessories for telephones, mobile phones, smart phones, tablet devices, PDAs, and MP3 players, namely, covers, neck straps, neck cords, and bags and cases specially adapted for holding or carrying portable telephones and telephone equipment and accessories.</p> <p>IC 16: paper bags; boxes of cardboard or paper; cardboard and paperboard envelopes and pouches for packaging; plastic materials for packaging, namely, bags; posters; pamphlets referring to travel; postcards; catalogs featuring luggage, travel accessories, bags, small leather goods, and clothing; paper labels; trading cards; greeting cards; business cards; invitation cards; printed publications, namely, books, newspapers, leaflets, and magazines featuring luggage, travel accessories, purses, small leather goods, and clothing; bookbinding materials; printed photographs; photograph albums; stationery, namely, note pads, desk pads, writing pads, drawing pads, envelopes, note paper; calendars; pocket calendars; note books; telephone indexes; diary covers; diaries; office requisites, namely, letter trays, paper knives, ink stands, inkwells, paper weights, pencil holders, pen holders, pencil tubs, blotting pads, pencils, fountain pens, rubber erasers, pen cases; printing types; printing blocks; table linens of paper.</p> <p>IC 25: clothing, namely, pullovers, vests, shirts, tee-shirts, trousers, jackets, suits, coats, rain coats, waterproof jackets, waterproof pants, overcoats, parkas, skirts, dresses, pajamas, dressing gowns, nightgowns, robe, gloves, neck ties, belts for clothing, leather belts, scarves, pocket squares, sashes for wear, shawls, stockings, socks, tights, braces for clothing, suspenders, stoles, underwear, lingerie, bathing suits; headwear; shoes; slippers; boots; half-boots.</p> <p>IC 26: buttons; hooks and eyes; shoe buckles; hair accessories, namely, hair pins, barrettes, hair bows, hair clips, hair bands, hair wraps; hair ornaments; brooches for clothing; clothing fasteners, namely, scarf holders.</p>

	4,614,736	September 30, 2014	<p>IC 09: Optical apparatus, namely, binoculars; blank USB sticks; spectacles; sunglasses; spectacle frames; spectacle glasses; spectacle cases; accessories for telephones, mobile phones, smart phones, tablet devices, PDAs, and MP3 players, namely, covers, neck straps, neck cords, and bags and cases specially adapted for holding or carrying portable telephones and telephone equipment and accessories.</p> <p>IC 16: Paper bags, boxes of cardboard or paper, cardboard and paperboard envelopes and pouches for packaging; plastic materials for packaging, namely, bags; posters; pamphlets referring to travel; postcards; catalogs featuring luggage, travel accessories, bags, small leather goods, and clothing; paper labels; trading cards; greeting cards; business cards; invitation cards; printed publications, namely, books, newspapers, leaflets, and magazines featuring luggage, travel accessories, purses, small leather goods, and clothing; bookbinding materials; printed photographs; photograph albums; stationery, namely, note pads, desk pads, writing pads, drawing pads, envelopes, note paper; calendars; pocket calendars; note books; telephone indexes; diary covers; diaries; office requisites, namely, letter trays, paper knives, ink stands, inkwells, paper weights, pencil holders, pen holders, pencil tubs, blotting pads, pencils, fountain pens, rubber erasers, pen cases; printing types; printing blocks; table linens of paper.</p> <p>IC 26: Buttons; hooks and eyes; shoe buckles; hair accessories, namely, hair pins, barrettes, hair bows, hair clips, hair bands, hair wraps; hair ornaments; brooches for clothing; clothing fasteners, namely, scarf holders.</p>
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