

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

LVMH SWISS MANUFACTURES, SA,

Plaintiff,

vs.

AAAREPLICAONLINE.COM a/k/a APWSI.CO.UK a/k/a
BREITLINGCHALLENGE.COM a/k/a BREITLINGENARGY.COM a/k/a
BREITLINGONLINESHOP.COM a/k/a BUYTAGHEUERWATCH.COM
a/k/a CADRANMONTRES.COM a/k/a CLASSICREPLICASUK.CO.UK a/k/a
DEALWATCH.CA a/k/a DISCOUNTWATCHESONLINE.COM a/k/a EASY-
MONTRES.COM a/k/a FOREVERWATCH.ME.UK a/k/a HOTREPLICA.US
a/k/a NEWATCHES4U.COM a/k/a OMEGAREPLICAUK.CO a/k/a
REPLICAWATCHESVIP.CO.UK a/k/a REPLICAWATCHUPS.CO.UK a/k/a
SWATCHESALE.CO.UK a/k/a THEBESTWATCHES.CO.UK a/k/a
TOPFAKEWATCHES.CO.UK a/k/a UKOMEGAS.CO.UK a/k/a
URWATCHES.CO.UK a/k/a WATCHESBEST.CO.UK a/k/a
WATCHESBEST.ME.UK a/k/a WATCHYJ.COM, 77MODELS.ORG,
AAAFINERWATCHES.ME a/k/a AMAZINGCLOCK.ME a/k/a
HELLOROLEX.IO a/k/a JOIN-WATCH.ME a/k/a JOINWATCHES.CO a/k/a
OK-REPLICA.ME a/k/a OK-REPLICAS.CO a/k/a PAYBESTWATCH.ME
a/k/a PAYBESTWATCHES.ORG a/k/a REPLICAS-SHOP.COM a/k/a
THANWATCHUS.ORG a/k/a TOURWATCHSEA.COM a/k/a
TRUSTYTIMEWATCHES.CO.UK a/k/a TRUSTYTIMEWATCHES.ME a/k/a
WATCHEQ.NET, AAAGRADEREPLICA.COM, ABCLUXURY.BIZ,
ANYWATCHREPLICA.CO a/k/a B2WATCH.ME a/k/a BALLWATCH.TOP
a/k/a BESTERWATCHES.ME a/k/a BESTMENWATCH.CO a/k/a
BESTWATCHES.TOP a/k/a BESTWATCHESREPLICA.TOP a/k/a
BESTWATCHESSHOP.TOP a/k/a BESTWATCHESTOP.CO a/k/a
BESTWATCHREPLICA.CC a/k/a BESTWATCHREPLICA.CO a/k/a
BOXWATCHES.TOP a/k/a BREITLINGBENTLEY.CO a/k/a
BREITLINGWATCHES.TOP a/k/a BUYREPLICAWATCH.TOP a/k/a
BUYSWISS.ME a/k/a CHEAPFAKEWATCHES.ORG a/k/a
CHEAPWATCHES.TOP a/k/a COOLWATCHESBUY.CO a/k/a
COPYWATCHES.CO a/k/a COPYWATCHESUK.TOP a/k/a
DESIGNERWATCH.TOP a/k/a DESIGNERWATCHES.TOP a/k/a
DISCOUNTREREPLICAWATCH.TOP a/k/a DISCOUNTTAGWATCHES.TOP
a/k/a ELITEREPLICAWATCHES.CO a/k/a FAKEWATCHES.CN a/k/a
FAKE--WATCHES.COM a/k/a FAKEWATCHESUK.AC.CN a/k/a
FAKEWATCHESUK.TOP a/k/a FAKEWATCHESUK.WIN a/k/a
FASHREPLICAWATCHES.COM a/k/a FIRSTCOPYWATCHES.ORG a/k/a
GENEVAWATCHES.CO a/k/a GREATBEARWATCH.TOP a/k/a
HAVEREPLICAWATCHES.COM a/k/a HREPLICAWATCHES.NET a/k/a

HUBLOTWATCHES.PW a/k/a INVICTAWATCHES.CN a/k/a
IPWATCH.TOP a/k/a IWATCHES.TOP a/k/a
LOVEBREITLINGWATCHES.COM a/k/a LOVESWISSWATCHES.CN a/k/a
LOVESWISSWATCHES.COM a/k/a LUXURYOFWATCHES.ME a/k/a
LUXURYOFWATCHES.TOP a/k/a LUXURYWATCHESBUY.TOP a/k/a
LUXURYWATCHESLOVE.TOP a/k/a LUXURYWATCHLOVE.CO a/k/a
LUXURYWATCHREPLICA.TOP a/k/a MEISTERWATCHES.NET a/k/a
MENSLUXURYWATCHES.CO a/k/a MENSLUXURYWATCHES.TOP a/k/a
MENSWATCH.CO a/k/a MENSWATCH.TOP a/k/a
MENSWATCHES.AC.CN a/k/a MENSWATCHES.PRO a/k/a
MENSWATCHESLOVE.CO a/k/a MENSWISS.COM a/k/a
MENWATCHES.CO a/k/a MENWATCHES.ORG a/k/a MENWATCHES.TOP
a/k/a MEN-WATCHES.TOP a/k/a MYWATCHREPLICA.TOP a/k/a
NETSCRIPTER.ORG a/k/a NICEMENSWATCHES.CO a/k/a
NICEMENSWATCHES.ORG a/k/a NICEWATCHESFORMENS.TOP a/k/a
OMEGAMENSWATCHES.COM a/k/a OMEGAWATCH.CC a/k/a
OMEGAWATCHESLOVE.COM a/k/a OMSKWATCHES.RU a/k/a
PARTWATCHESUS.NET a/k/a PATEKWATCH.NET.CN a/k/a
PATEKWATCHES.COM.CN a/k/a PBJFUN.COM a/k/a PERFECTSWISS.CN
a/k/a PHOTO-ZJ.COM a/k/a REPLICADESIGNERWATCHES.CO a/k/a
REPLICAMYWATCH.TOP a/k/a REPLICAONLINE.CO a/k/a
REPLICAPIRCEWATCH.TOP a/k/a REPLICAWATCH.AC.CN a/k/a
REPLICAWATCH2YOU.COM a/k/a REPLICA-WATCHES.CO a/k/a
REPLICAWATCHES.COM.CO a/k/a REPLICAWATCHESHOT.ME a/k/a
REPLICAWATCHESLOVE.CO a/k/a REPLICAWATCHESONLINE.CO
a/k/a REPLICAWATCHESOUTLET.TOP a/k/a
REPLICAWATCHESREVIEW.CO a/k/a REPLICAWATCHESS.CO a/k/a
REPLICAWATCHESS.TOP a/k/a REPLICAWATCHFORUM.TOP a/k/a
REPLICAWATCHINFO.PRO a/k/a REPLICAWATCHNEW.TOP a/k/a
REPLICAWATCHSALES.CO a/k/a REPLICWATCHES.COM a/k/a
REPLICWATCHESTOP.TOP a/k/a ROLEXDAYDATE.TOP a/k/a
ROLEXMENWATCHESCOPY.CO a/k/a ROSEGOLDWATCH.CO a/k/a
SLAPWATCH.CO a/k/a SOLOWATCH.ORG a/k/a STAR77.NET a/k/a
SWISSCOPYWATCHES.ORG a/k/a SWISSWATCHCOPIES.RU a/k/a
SWISSWATCHES.COM.CN a/k/a SWISSWATCHESLOVE.COM a/k/a
SWISSWATCHESREPLICA.TOP a/k/a SWISSWATCHLOVE.COM a/k/a
TAGHEUERFORSALE.TOP a/k/a TAGREPLICAWATCH.CO a/k/a
TED79.COM a/k/a TOPCHEAPWATCHES.TOP a/k/a
TOPSWISSBRANDS.CN a/k/a TOPWATCHSTORE.TOP a/k/a
WATCH2SHOP.ME a/k/a WATCH90.COM a/k/a WATCHAAA.TOP a/k/a
WATCH-BABES.TOP a/k/a WATCHCOOL.TOP a/k/a WATCHES.AC.CN
a/k/a WATCHES-24.TOP a/k/a WATCHES54.RU a/k/a
WATCHESANDSHOP.TOP a/k/a WATCHESATOZ.TOP a/k/a
WATCHESBESTCHEAP.TOP a/k/a WATCHESBREITLING.CO a/k/a
WATCHESCOPY.CO a/k/a WATCHESCOPY.NET a/k/a
WATCHESFORMEN.TOP a/k/a WATCHESFORMENS.ME a/k/a

WATCHESFORMENS.ORG a/k/a WATCHESIN.COM a/k/a
WATCHESL00L.CN a/k/a WATCHESLUXURY.CO a/k/a
WATCHESLUXURY.TOP a/k/a WATCHESREPLICA.CN a/k/a
WATCHESREPLICASALES.CO a/k/a WATCHES-SHOP.CO a/k/a
WATCHESSWISS.ORG a/k/a WATCHESTOPLOVE.COM a/k/a
WATCHESWOMEN.ME a/k/a WATCHESWORLD.ORG a/k/a
WATCHFORMENS.COM a/k/a WATCHFORSALE.TOP a/k/a
WATCHFORUM.ME a/k/a WATCHOMEGA.TOP a/k/a
WATCHREPLICALOVE.PRO a/k/a WATCHREPLICAONLINE.CO a/k/a
WATCHSHOPCHEAP.COM a/k/a WATCHSTORE.TOP a/k/a
WATCHTOPBRANDS.COM a/k/a WATCHWINDER.PRO a/k/a
WATHCES.TOP a/k/a WOMENSWATCHES.WIN a/k/a
WORLDWATCHES.TOP a/k/a WOW-BICYCLE.COM,
BESTREPLICAWATCHES.CO.UK a/k/a HELLOREPLICA.UK a/k/a
REPLICASWISSWATCHUK.CO.UK a/k/a
REPLICAWATCHESBEST.CO.UK, SWISSMONTRES.CN,
BESTWATCHES-FORMEN.COM a/k/a CAPNAB.COM a/k/a
COASTOPTICS.ONLINE a/k/a EMPRENDEMICO.COM a/k/a
EREDYSHOP.COM a/k/a QUARTZAUTOMATIC.COM a/k/a
SNOREZINE.COM a/k/a SYSKE.COM a/k/a TOPGUNTIME.COM,
BESTWATCHES.CN a/k/a BESTWATCHESI.COM,
BUYQUALITYWATCH.COM, CHEAPPERFECTSALE.COM a/k/a
PARWATCHES.COM a/k/a PEANWATCHES.COM a/k/a
PEDWATCHES.COM a/k/a PERNWATCHES.COM a/k/a
POBEWATCHES.COM a/k/a PUPWATCHES.COM, CHINAWATCHES.CO,
CHOOSEPOPWATCH.CO, CLOUDWATCHES.CO,
COPYWATCHONLINE.CO, D4L.CO, DOREPLICAWATCH.COM,
EUWATCHES.CO.UK a/k/a KOPIORKLOCKORSE.COM a/k/a
NOWMONTRES.FR a/k/a TSMONTRE.FR, EXPOSED.SU a/k/a MCA.MN
a/k/a RUS.TL a/k/a SCIU.COM.AU, FAKESOLD.COM a/k/a
REPLICASELL.COM a/k/a WATCHESCOSY.NET a/k/a
WATCHESEBAY.COM a/k/a WATCHESVOGUE.COM,
FAKEWATCHSHOP.COM, FASHIONTIMEWEAR.COM,
FINDTAGHEUER.ME, FINDTIMELESS.COM, GOBAREPLICA.COM a/k/a
GOSHOPREPLICA.COM, GREATWATCHESHERE.COM,
HELLOPANERAI.ME, IDOLWATCHES4US.COM, ISWSS.NET,
KUVARSIT01.COM, LUXREPLICA.CO, LUXSWISSRW.CO.UK a/k/a
LUXURYNOBLEWATCHES.COM, LUXURIOUS-WATCH.COM a/k/a
SELLERSWATCHES.COM, LUXURYREPLICA.TO,
MENREPLICAWO.CO, MONTRESLUXE.CO, MOSTWATCHES.COM,
MOWATCHES.BE a/k/a SAVETECHNET.COM a/k/a USAONWATCH.BIZ
a/k/a WATCHESNOTABLE.COM, MYSEAMASTER.NET a/k/a
MYSEAMASTER.ORG, NICEWATCHES.BIZ, NOOBWATCHFANS.COM,
OLMATT.COM, ONE-PRICES.COM, PF-828.COM,
POPREPLICAICNOIC.CO, PORTABELLOPIXIE.COM, PPAWATCH.CO
a/k/a REPLICATRUSTY.CO, PRATIKALUMINYUM.COM,

RELOJLINE.CO, REPLICAHORLOGE.BE a/k/a
REPLICAHORLOGES.ORG, REPLICAHOUSE.NET, REPLICA-ROLEX.CO
a/k/a REPLICAS-ROLEX.CO a/k/a REPLICAVVATCHES.CO.UK a/k/a
REPLICA-WATCHESUK.ORG.UK a/k/a WATCHES-REPLICA.INFO,
REPLICASDERELOJES.CO, REPLICAWATCHE.ONLINE,
REPLICAWATCHE.ZONE, REPLICAWATCHESPRO.CO,
REPLICAWATCHOINDIA.COM, REPLICAWATCHPRO.NL,
REPLICAWATCHREPORT.CO, REPLIQUESMONTRES.ME,
REPTRIPLEAWATCH.CO, REPWATCHESGUY.CO, REPWEAR.CO,
REVIEWBESTSELLING.COM, SANTAS-ME.COM, THEPSYAPP.COM,
TIMEDIAL.CO.UK, TIMESTORE.CO, TIMESWISSSHOP.COM,
TOPREPLICAON.CO, TS-WATCHES.ME, TTW-CLONES.COM,
UHRENKING.COM, VOLLMERWATCHTIME.COM,
WATCHBOXGIFT.COM, WATCH-DEMO.CO, WATCHDRESSED.COM,
MYWATCHESONLINE.COM.AU a/k/a WATCHESAUSTRALIA.CO,
WATCHESBUYOFF.CO, WATCHESBUYSALE.CO, WATCHESMING.CO,
WATCHESRATINGS.CO, WATCHESREPLICA.INFO a/k/a
WATCHESSTORES.CN, WATCHESSPACES.COM, WATCHESTOP.CO,
WATCHESUN.CO, WATCHESUSAUK.ME, WATCHESYO.CO,
WATCHFEED.CO, WATCHPRICE.CO, WRISTWATCHLINE.CO,
XMONTRES.NET, and X-WATCH.CO, each an Individual, Partnership,
Business Entity, or Unincorporated Association,

Defendants.

COMPLAINT FOR INJUNCTIVE RELIEF AND DAMAGES

Plaintiff, LVMH Swiss Manufactures, SA (“LVMH” or “Plaintiff”)¹, hereby sues
Defendants, the individuals, partnerships, business entities, or unincorporated associations
identified in the caption, which are set forth on Schedule “A” hereto (collectively “Defendants”).
Defendants are promoting, selling, offering for sale and/or distributing goods bearing

¹ Plaintiff is a member of the Federation of the Swiss Watch Industry FH (“the Federation”), a non-profit trade association with nearly 500 members, representing more than 90% of all Swiss watch manufacturers, which was founded in 1924 to contribute to the protection and development of the Swiss Watch Industry. In 1999, the Federation created the Anti-Counterfeiting Group, which was established to combat common sources of counterfeit goods which cause a common harm to its members’ respective brands, individually and to the Swiss watch industry in its entirety, which results in further harm to each member’s brand. Since 1999, the Federation through its anti-counterfeiting division, has worked with international law enforcement and government agencies to conduct raids and investigations of counterfeit operations, as well as raise public awareness regarding the issue.

counterfeits and confusingly similar imitations of Plaintiff'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, Plaintiff 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 Plaintiff'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 direct business activities towards consumers throughout the United States, including within the State of Florida and this district through at least the fully interactive² commercial Internet websites operating under the Subject Domain Names.

² Several Defendants use their Subject Domain Names to act as supporting domain names to direct traffic to their fully-interactive, commercial websites operating under other Subject Domain Names, from which consumers can complete purchases. Some of the supporting domain names, when accessed directly, appear to be blog style websites; however, when visited from a search engine such as Google, visitors are redirected to the fully-interactive websites operating under other Subject Domain Names. Other supporting domain names either automatically redirect and forward to a fully-interactive, commercial Internet website operating under one of the Subject Domain Names or redirect a consumer to a fully-interactive, commercial Internet

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.

THE PLAINTIFF

4. LVMH is a societe anonyme organized under the laws of Switzerland with a principal place of business in La Chaux-de-Fonds, Switzerland. LVMH, through and in connection with related companies manufactures, markets, and sells watches and related goods throughout the world, including within this district, under multiple world-famous common law and federally registered trademarks including the trademarks identified in Schedule “B” hereto. LVMH sells its genuine high-quality products to consumers throughout the United States, including within the State of Florida and this district. Defendants, through the sale and offering for sale of counterfeit and infringing versions of Plaintiff’s branded products, are directly, and unfairly, competing with Plaintiff’s economic interests in the State of Florida and causing Plaintiff harm within this jurisdiction.

5. Like many other famous trademark owners, Plaintiff 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 Plaintiff’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 Plaintiff expends significant resources in connection with trademark enforcement efforts, including legal fees, investigative

website operating under one of the Subject Domain Names upon clicking a product or link on the website. Accordingly, the redirecting websites are identified as such in Schedule “A.”

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 companies such as Plaintiff 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 Plaintiff's brand.

THE DEFENDANTS

7. Defendants operate through domain names registered with registrars in multiple countries and are comprised of individuals, partnerships and/or business entities of unknown makeup, whom, upon information and belief, reside and/or operate in foreign jurisdictions. 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 versions of Plaintiff's branded goods while shrinking the legitimate marketplace for Plaintiff's

genuine branded goods. The natural and intended byproduct of Defendants' actions is the erosion and destruction of the goodwill associated with Plaintiff's famous name and trademarks, as well as the destruction of the legitimate market sector in which Plaintiff operates.

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

12. Upon information and belief, Defendants directly engage in unfair competition with Plaintiff by (i) advertising, offering for sale, and/or selling goods bearing and/or using counterfeits and infringements of one or more of Plaintiff's trademarks to consumers within the United States and this district through at least the commercial websites operating under the Subject Domain Names and additional domain names and websites not yet known to Plaintiff and (ii) creating and maintaining an illegal marketplace enterprise for the purpose of diverting business from Plaintiff'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 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 Plaintiff's trademarks unless preliminarily and permanently enjoined. Moreover, upon information and belief, Defendants will continue to maintain and grow their illegal marketplace enterprise at Plaintiff'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 Plaintiff 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 Plaintiff's trademarks are essential components of Defendants' counterfeiting and infringement activities and are one of the means by which Defendants further their counterfeiting and infringement scheme and cause harm to Plaintiff. Moreover, Defendants are using Plaintiff's famous 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 Plaintiff's legitimate consumer marketplace at Plaintiff's expense.

COMMON FACTUAL ALLEGATIONS

Plaintiff's Trademark Rights

17. Plaintiff is the owner of the trademarks identified on Schedule "B" hereto (the "Tag Heuer Marks") which are registered on the Principal Register of the United States Patent and Trademark Office. The Tag Heuer Marks are used in connection with the manufacture and

distribution of high quality goods in the categories identified on Schedule “B.” True and correct copies of the Certificates of Registration for the Tag Heuer Marks are attached hereto as Composite Exhibit “1.”

18. Long before the Defendants began their infringing activities complained of herein, the Tag Heuer Marks have been used by Plaintiff in interstate commerce to identify and distinguish Plaintiff’s high-quality goods for an extended period of time and serve as symbols of Plaintiff’s quality, reputation and goodwill.

19. Further, Plaintiff and related companies have expended substantial time, money and other resources developing, advertising and otherwise promoting the Tag Heuer Marks. Plaintiff and related companies have spent millions of dollars to extensively advertise and promote products under the Tag Heuer Marks in magazines, newspapers, on the Internet and in other media worldwide, including the official Tag Heuer website, www.tagheuer.com. The Tag Heuer Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

20. Plaintiff and related companies have extensively used, advertised and promoted the Tag Heuer Marks in the United States in connection with the sale of high quality watches and related goods. As a result, the Tag Heuer Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as identifiers of high quality goods.

21. Plaintiff has carefully monitored and policed the use of the Tag Heuer Marks and has never assigned or licensed the Tag Heuer Marks to any of the Defendants in this matter.

22. Genuine goods bearing the Tag Heuer Marks are widely legitimately advertised and promoted by Plaintiff and related companies, authorized distributors and unrelated third parties via the Internet. Over the course of the past several years, visibility on the Internet,

particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Plaintiff's overall marketing and consumer education efforts. Thus, Plaintiff and related companies expend significant monetary resources on Internet marketing and consumer education, including search engine optimization ("SEO") strategies. Those strategies allow Plaintiff and its authorized retailers to fairly and legitimately educate consumers about the value associated with the Tag Heuer Marks and the goods sold thereunder.

Defendants' Infringing Activities

23. Upon information and belief, Defendants are promoting and advertising, distributing, selling and/or offering for sale goods in interstate commerce bearing counterfeit and infringing trademarks that are exact copies of the Tag Heuer 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 Tag Heuer branded items offered for sale are attached hereto as Composite Exhibit "2." Specifically, upon information and belief, Defendants are using identical copies of the Tag Heuer Marks for different quality goods. Plaintiff has used the Tag Heuer Marks extensively and continuously before Defendants began offering counterfeit and confusingly similar imitations of Plaintiff's goods.

24. Upon information and belief, Defendants' Counterfeit Goods are of a quality substantially different than that of Plaintiff'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 quality goods offered for sale by Plaintiff despite Defendants' knowledge that they are without authority to use the Tag Heuer 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 Plaintiff.

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

26. As part of their overall infringement and counterfeiting scheme, Defendants are, upon information and belief, concurrently employing and benefitting 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 Tag Heuer Marks. Specifically, Defendants are, upon information and belief, using counterfeits of one or more of the Tag Heuer Marks in order to make their websites selling illegal goods appear more relevant and attractive to consumers searching for Tag Heuer 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 Plaintiff's genuine goods. Defendants are causing individual, concurrent and indivisible harm to Plaintiff and the consuming public by (i) depriving Plaintiff of its right to fairly compete for space within search engine results and reducing the visibility of Plaintiff's genuine goods on the World Wide Web, (ii) causing an overall degradation of the value of the goodwill associated with the Tag Heuer Marks, (iii) increasing Plaintiff'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 Plaintiff with impunity.

27. 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 Plaintiff and the consuming public for Defendants' own benefit.

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

29. Defendants' use of the Tag Heuer Marks, including the promotion and advertisement, reproduction, distribution, sale and/or offering for sale of their Counterfeit Goods, is without Plaintiff's consent or authorization.

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

31. 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 Plaintiff's genuine goods and Defendants' Counterfeit Goods, which there is not.

32. Further, upon information and belief, Defendants 1, 6, and 24 have registered their respective Subject Domain Names, buytagheuerwatch.com, discounttagwatches.top, tagreplicawatch.co, tagheuerforsale.top, and findtagheuer.me, using a mark which is nearly identical and/or confusingly similar to at least one of the Tag Heuer Marks, (the “Cybersquatted Subject Domain Names”).

33. Upon information and belief, Defendants 1, 6, and 24 have registered and/or used their respective Cybersquatted Subject Domain Names with the bad faith intent to profit from the Tag Heuer Marks.

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

35. Upon information and belief, Defendants 1, 6, and 24 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.

36. Upon information and belief, Defendants 1, 6, and 24 have never used any of the Cybersquatted Subject Domain Names in connection with a bona fide offering of goods or services.

37. Upon information and belief, Defendants 1, 6, and 24 have not made any bona fide non-commercial or fair use of the Tag Heuer Marks on a website accessible under the Cybersquatted Subject Domain Names.

38. Upon information and belief, Defendants 1, 6, and 24 have intentionally incorporated at least one of the Tag Heuer Marks in their respective Cybersquatted Subject

Domain Names to divert consumers looking for Plaintiff's Internet website to their own Internet websites for commercial gain.

39. 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 Plaintiff and the overall consumer market in which it operates as a result of Defendants' concurrent actions.

40. 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 Plaintiff.

41. Plaintiff has no adequate remedy at law.

42. Plaintiff is suffering irreparable injury and has suffered substantial damages as a result of Defendants' unauthorized and wrongful use of the Tag Heuer 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, Plaintiff and the consuming public will continue to be harmed.

43. The harm and damage sustained by Plaintiff has 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)

44. Plaintiff hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 43 above.

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

46. Specifically, Defendants are promoting and otherwise advertising, selling, offering for sale, and distributing goods, using counterfeits and/or infringements of one or more of the Tag Heuer Marks. Defendants are continuously infringing and inducing others to infringe the Tag Heuer Marks by using them to advertise, promote, sell and/or offer to sell counterfeit and infringing branded goods.

47. 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.

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

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

50. Plaintiff 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))

51. Plaintiff hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 43 above.

52. Defendants' Counterfeit Goods bearing, offered for sale, and sold using copies of one or more of the Tag Heuer Marks have been widely advertised and offered for sale throughout the United States.

53. Defendants' Counterfeit Goods bearing, offered for sale and sold using copies of one or more of the Tag Heuer Marks are virtually identical in appearance to Plaintiff'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.

54. 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 Plaintiff's detriment.

55. Defendants have authorized infringing uses of one or more of the Tag Heuer Marks in Defendants' advertisement and promotion of their counterfeit and infringing branded goods. 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.

56. Additionally, many Defendants are using counterfeits and infringements of one or more of the Tag Heuer Marks in order to unfairly compete with Plaintiff and others for space

within search engine organic results, thereby jointly depriving Plaintiff of a valuable marketing and educational tool which would otherwise be available to Plaintiff and reducing the visibility of Plaintiff's genuine goods on the World Wide Web.

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

58. Plaintiff 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, Plaintiff 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))
(Against Defendants 1, 6, and 24 only)

59. Plaintiff hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 43 above.

60. Upon information and belief, Defendants 1, 6, and 24 acted with the bad faith intent to profit from the Tag Heuer Marks and the goodwill associated with the Tag Heuer Marks by registering and using the Cybersquatted Subject Domain Names.

61. The Tag Heuer Marks were distinctive and famous at the time Defendants 1, 6, and 24 registered their respective Cybersquatted Subject Domain Names.

62. The Cybersquatted Subject Domain Names are identical to, confusingly similar to or dilutive of one or more of the Tag Heuer Marks.

63. Defendants 1, 6, and 24's actions constitute cybersquatting in violation of §43(d) of the Lanham Act, 15 U.S.C. §1125(d).

64. Plaintiff has suffered and will continue to suffer irreparable injury and damages due to the above described activities of Defendants if Defendants are not enjoined.

COUNT IV - COMMON LAW UNFAIR COMPETITION

65. Plaintiff hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 43 above.

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

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

68. 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 Tag Heuer Marks.

69. Plaintiff 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

70. Plaintiff hereby adopts and re-allege the allegations set forth in Paragraphs 1 through 43 above.

71. 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 Tag Heuer Marks. Plaintiff is the owner of all common law rights in and to the Tag Heuer Marks.

72. 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 Tag Heuer Marks.

73. 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' Counterfeit Goods bearing the Tag Heuer Marks.

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

PRAYER FOR RELIEF

75. WHEREFORE, Plaintiff 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 Tag Heuer Marks, from using the Tag Heuer Marks, or any mark or trade dress similar thereto, in connection with the sale of any unauthorized goods; from using any logo, trade name or trademark or trade dress that may be calculated to falsely

advertise the services or goods of Defendants as being sponsored by, authorized by, endorsed by, or in any way associated with Plaintiff; from falsely representing themselves as being connected with Plaintiff, 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 Plaintiff; from using any reproduction, counterfeit, copy, or colorable imitation of the Tag Heuer 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 Plaintiff, or in any way endorsed by Plaintiff and from offering such goods in commerce; from engaging in search engine optimization strategies using colorable imitations of the Tag Heuer Marks; and from otherwise unfairly competing with Plaintiff.

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 Tag Heuer Marks.

c. Entry of an order that, upon Plaintiff'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 Tag Heuer 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 Plaintiff'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, and any other domain names being used and/or controlled by Defendants to engage in the business of marketing, offering to sell, and/or selling goods bearing counterfeits and infringements of the Tag Heuer Marks, 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 Plaintiff's election, transferring the Subject Domain Names and any other domain names used by Defendants to engage in their counterfeiting of the Tag Heuer Marks at issue to Plaintiff's control so they may no longer be used for illegal purposes.

f. Entry of an injunction, pursuant to 28 U.S.C. § 1651(a), The All Writs Act and the Court's inherent authority, authorizing Plaintiff to request any Internet search engines which are provided with notice of the injunction, to permanently disable, de-index or delist any specific URLs of the Subject Domain Names identified by Plaintiff which are being used by the Defendants in connection with the offering for sale or sale of goods bearing counterfeits of the Tag Heuer Marks based upon Defendants' unlawful activities being conducted via the Subject Domain Names as a whole.

g. 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 Plaintiff 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).

h. 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).

i. Entry of an order requiring each Defendant to instruct all of its service providers in writing to permanently cease providing any services to the Defendant in connection with 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 Tag Heuer Marks, and, if within five (5) days of entry of such order any Defendant fails to make such a written instruction, the Court order the act to be done by another person appointed by the Court at Defendant's expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a)

j. Entry of an order requiring Defendants to account to and pay Plaintiff for all profits and damages resulting from Defendants' trademark counterfeiting and infringing activities and that the award to Plaintiff be trebled, as provided for under 15 U.S.C. §1117, or, at Plaintiff's election with respect to Count I, that Plaintiff 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.

k. Entry of an order requiring Defendants 1, 6, and 24 to account to and pay Plaintiff for all profits and damages resulting from Defendants 1, 6, and 24's cybersquatting activities and that the award to Plaintiff be trebled, as provided for under 15 U.S.C. §1117, or, at Plaintiff's election with respect to Count III, that Plaintiff be awarded statutory damages from Defendants 2, 6, and 26 in the amount of one hundred thousand dollars (\$100,000.00) per cyberquatted domain name used as provided by 15 U.S.C. §1117(d) of the Lanham Act

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

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

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

DATED: October 22, 2018.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **s:/Stephen Gaffigan**

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SCHEDULE "A"
DEFENDANTS BY NUMBER AND SUBJECT DOMAIN NAME
AND ASSOCIATED REDIRECT

Defendant Number	Defendant / Subject Domain Name	Associated Redirect
1	aaareplicaonline.com	watchyj.com
1	apwsi.co.uk	watchyj.com
1	breitlingchallenge.com	watchyj.com
1	breitlingenargy.com	watchyj.com
1	breitlingonlineshop.com	watchyj.com
1	buytagheuerwatch.com	watchyj.com
1	cadranmontres.com	watchyj.com
1	classicreplicasuk.co.uk	watchyj.com
1	dealwatch.ca	watchyj.com
1	discountwatchesonline.com	watchyj.com
1	easy-montres.com	watchyj.com
1	foreverwatch.me.uk	watchyj.com
1	hotreplica.us	watchyj.com
1	newwatches4u.com	watchyj.com
1	omegareplicauk.co	watchyj.com
1	replicawatchesvip.co.uk	watchyj.com
1	replicawatchups.co.uk	watchyj.com
1	swatchesale.co.uk	watchyj.com
1	thebestwatches.co.uk	watchyj.com
1	topfakewatches.co.uk	watchyj.com
1	ukomegas.co.uk	watchyj.com
1	urwatches.co.uk	watchyj.com
1	watchesbest.co.uk	
1	watchesbest.me.uk	
1	watchyj.com	
2	77models.org	
3	aaafinewatches.me	
3	amazingclock.me	
3	hellorolex.io	
3	join-watch.me	
3	joinwatches.co	join-watch.me
3	ok-replica.me	
3	ok-replicas.co	
3	paybestwatch.me	paybestwatches.org
3	paybestwatches.org	
3	replicas-shop.com	hellorolex.io
3	thanwatchus.org	

3	tourwatchsea.com	hellorolex.io
3	trustytimewatches.co.uk	trustytimewatches.me
3	trustytimewatches.me	
3	watcheq.net	paybestwatches.org
4	aaagradereplica.com	
5	abcluxury.biz	
6	anywatchreplica.co	
6	b2watch.me	
6	ballwatch.top	
6	besterwatches.me	
6	bestmenwatch.co	
6	bestwatches.top	
6	bestwatchesreplica.top	
6	bestwatchesshop.top	
6	bestwatchestop.co	
6	bestwatchreplica.cc	
6	bestwatchreplica.co	
6	boxwatches.top	
6	breitlingbentley.co	
6	breitlingwatches.top	
6	buyreplicawatch.top	
6	buyswiss.me	
6	cheapfakewatches.org	
6	cheapwatches.top	
6	coolwatchesbuy.co	
6	copywatches.co	
6	copywatchesuk.top	
6	designerwatch.top	
6	designerwatches.top	
6	discountreplicawatch.top	
6	discounttagwatches.top	
6	elitereplicawatches.co	
6	fakewatches.cn	
6	fake--watches.com	
6	fakewatchesuk.ac.cn	
6	fakewatchesuk.top	
6	fakewatchesuk.win	
6	fashreplicawatches.com	
6	firstcopywatches.org	
6	genevawatches.co	
6	greatbearwatch.top	
6	havereplicawatches.com	
6	hreplicawatches.net	

6	hublotwatches.pw	
6	invictawatches.cn	
6	ipwatch.top	
6	iwatches.top	
6	lovebreitlingwatches.com	
6	loveswisswatches.cn	
6	loveswisswatches.com	
6	luxuryofwatches.me	
6	luxuryofwatches.top	
6	luxurywatchesbuy.top	
6	luxurywatcheslove.top	
6	luxurywatchlove.co	
6	luxurywatchreplica.top	
6	meisterwatches.net	
6	menluxurywatches.co	
6	menluxurywatches.top	
6	menwatch.co	
6	menwatch.top	
6	menwatches.ac.cn	
6	menwatches.pro	
6	menwatcheslove.co	
6	menwiss.com	
6	menwatches.co	
6	menwatches.org	
6	menwatches.top	
6	men-watches.top	
6	mywatchreplica.top	
6	netscripiter.org	
6	nicemenswatches.co	
6	nicemenswatches.org	
6	nicewatchesformens.top	
6	omegamenswatches.com	
6	omegawatch.cc	
6	omegawatcheslove.com	
6	omskwatches.ru	
6	partwatchesus.net	
6	patekwatch.net.cn	
6	patekwatches.com.cn	
6	pbjfun.com	
6	perfectswiss.cn	
6	photo-zj.com	
6	replicadesignerwatches.co	
6	replicamywatch.top	

6	replicaonline.co	
6	replicapircewatch.top	
6	replicawatch.ac.cn	
6	replicawatch2you.com	
6	replica-watches.co	
6	replicawatches.com.co	
6	replicawatcheshot.me	
6	replicawatcheslove.co	
6	replicawatchesonline.co	
6	replicawatchesoutlet.top	
6	replicawatchesreview.co	
6	replicawatchess.co	
6	replicawatchess.top	
6	replicawatchforum.top	
6	replicawatchinfo.pro	
6	replicawatchnew.top	
6	replicawatchsales.co	
6	replicwatches.com	
6	replicwatchestop.top	
6	rolexdaydate.top	
6	rolexmenwatchescopy.co	
6	rosegoldwatch.co	
6	slapwatch.co	
6	solowatch.org	
6	star77.net	
6	swisscopywatches.org	
6	swisswatchcopies.ru	
6	swisswatches.com.cn	
6	swisswatcheslove.com	
6	swisswatchesreplica.top	
6	swisswatchlove.com	
6	tagheuerforsale.top	
6	tagreplicawatch.co	
6	ted79.com	
6	topcheapwatches.top	
6	topswissbrands.cn	
6	topwatchstore.top	
6	watch2shop.me	
6	watch90.com	
6	watchaaa.top	
6	watch-babes.top	
6	watchcool.top	
6	watches.ac.cn	

6	watches-24.top	
6	watches54.ru	
6	watchesandshop.top	
6	watchesatoz.top	
6	watchesbestcheap.top	
6	watchesbreitling.co	
6	watchescopy.co	
6	watchescopy.net	
6	watchesformen.top	
6	watchesformens.me	
6	watchesformens.org	
6	watchesin.com	
6	watchesl00l.cn	
6	watchesluxury.co	
6	watchesluxury.top	
6	watchesreplica.cn	
6	watchesreplicasales.co	
6	watches-shop.co	
6	watcheswiss.org	
6	wachestoplove.com	
6	watcheswomen.me	
6	watchesworld.org	
6	watchformens.com	
6	watchforsale.top	
6	watchforum.me	
6	watchomega.top	
6	watchrepicalove.pro	
6	watchreplicaonline.co	
6	watchshopcheap.com	
6	watchstore.top	
6	watchtopbrands.com	
6	watchwinder.pro	
6	wathces.top	
6	womenswatches.win	
6	worldwatches.top	
6	wow-bicycle.com	
7	bestreplicawatches.co.uk	
7	helloreplica.uk	
7	replicaswisswatchuk.co.uk	helloreplica.uk
7	replicawatchesbest.co.uk	bestreplicawatches.co.uk
8	swissmontres.cn	
9	bestwatches-formen.com	coastoptics.online
9	capnab.com	coastoptics.online

9	coastoptics.online	
9	emprendemico.com	coastoptics.online
9	eredyshop.com	coastoptics.online
9	quartzautomatic.com	pedwatches.com
9	snorezine.com	coastoptics.online
9	syske.com	coastoptics.online
9	topguntime.com	coastoptics.online
10	bestwatches.cn	bestwatchesi.com
10	bestwatchesi.com	
11	buyqualitywatch.com	
12	cheaperfectsale.com	pernwatches.com
12	parwatches.com	
12	peanwatches.com	
12	pedwatches.com	
12	pernwatches.com	
12	pobewatches.com	
12	pupwatches.com	
13	chinawatches.co	
14	choosepopwatch.co	
15	cloudwatches.co	
16	copywatchonline.co	
17	d4l.co	
18	doreplicawatch.com	
19	euwatches.co.uk	
19	kopiorklockorse.com	
19	nowmontres.fr	
19	tsmontre.fr	
20	exposed.su	rus.tl
20	mca.mn	
20	rus.tl	-
20	sciu.com.au	
21	fakesold.com	
21	replicasell.com	
21	watchescosy.net	
21	watchesebay.com	
21	watchesvogue.com	
22	fakewatchshop.com	
23	fashiontimewear.com	
24	findtagheuer.me	
25	findtimeless.com	
26	gobareplica.com	
26	goshopreplica.com	gobareplica.com
27	greatwatcheshere.com	

28	hellopanerai.me	
29	idolwatches4us.com	
30	iswss.net	
31	kuvarsit01.com	
32	luxreplica.co	
33	luxswissrw.co.uk	
33	luxurynoblewatches.com	
34	luxurious-watch.com	
34	sellerswatches.com	
35	luxuryreplica.to	
36	menreplicawo.co	
37	montresluxe.co	
38	mostwatches.com	
39	mowatches.be	
39	savetechnet.com	usaonwatch.biz
39	usaonwatch.biz	mowatches.be
39	watchesnotable.com	mowatches.be
40	myseamaster.net	myseamaster.org
40	myseamaster.org	
41	nicewatches.biz	
42	noobwatchfans.com	
43	olmatt.com	
44	one-prices.com	
45	pf-828.com	
46	popreplicaicnoic.co	
47	portabellopixie.com	
48	ppawatch.co	
48	replicatrusty.co	
49	pratikaluminyum.com	
50	relojline.co	
51	replicahorloge.be	
51	replicahorloges.org	replicahorloge.be
52	replicahouse.net	
53	replica-rolex.co	
53	replicas-rolex.co	
53	replicavatches.co.uk	
53	replica-watchesuk.org.uk	
53	watches-replica.info	
54	replicasderelojes.co	
55	replicawatche.online	
56	replicawatche.zone	
57	replicawatchespro.co	
58	replicawatchoindia.com	

59	replicawatchpro.nl	
60	replicawatchreport.co	
61	repliquesmontres.me	
62	reptripleawatch.co	
63	repwatchesguy.co	
64	repwear.co	
65	reviewbestselling.com	
66	santas-me.com	
67	thepsyapp.com	
68	timedial.co.uk	
69	timestore.co	
70	timeswissshop.com	
71	topreplicaon.co	
72	ts-watches.me	
73	ttw-clones.com	
74	uhrenking.com	
75	vollmerwatchtime.com	
76	watchboxgift.com	
77	watch-demo.co	
78	watchdressed.com	
79	mywatchesonline.com.au	watchesaustralia.co
79	watchesaustralia.co	
80	watchesbuyoff.co	
81	watchesbuysale.co	
82	watchesming.co	
83	watchesratings.co	
84	watchesreplica.info	watchesstores.cn
84	watchesstores.cn	
85	watchespaces.com	
86	wachestop.co	
87	watchesun.co	
88	watchesusauk.me	
89	watchesyo.co	
90	watchfeed.co	
91	watchprice.co	
92	wristwatchline.co	
93	xmontres.net	
94	x-watch.co	

PLAINTIFF'S FEDERALLY REGISTERED TRADEMARKS

Trademark	Registration Number	Registration Date	Class / Goods
	1,471,988	January 12, 1988	IC 009. Time measuring instruments, namely, electronic stop watches, remote control mini-printer timers, electronic and manual timers, photocell timers, starting gate timers, telephone liaison timers, impulse distributor timers, electronic pistol starting timers, manual contactor timers. IC 014. Clocks, watches and parts thereof. IC 025. Sportswear, namely, parkas.
TAG HEUER	2,281,436	September 28, 1999	IC 014. Clocks, watches and parts thereof.
TAG HEUER	5,202,283	May 16, 2017	IC 003. soaps; perfumes; cosmetics, creams, and lotions for the body and hair; shampoos; makeup and makeup removers; lipstick; beauty masks; shaving preparations; after-shave lotions and balms; non-medicated toiletries; deodorants for personal use; leather polishes; preservative creams for leather IC 009. apparatus for recording, transmission, reproduction, or processing of sound or images; electronic timers and timing sensors; calculating machines; equipment for data processing; timing dials and timing sensors; electronic timers; chronographs for use as specialized time recording apparatus; game software; computer operating software for smartwatches and mobile electronic devices; computer software for sending and receiving electronic mail, text messages, data, photographs, and videos; computer software for accessing, browsing, and searching online databases; computer software for sensing, monitoring, recording, displaying, measuring, and transmitting global positioning, direction, distance, altitude, speed, navigational

		<p>information, weather information, temperature, physical activity level, heart rate, pulse rate, blood pressure, calories burned, steps taken, and biometric data; computer software for tracking and managing information regarding health, fitness, and wellness programs; computer peripherals; telephones; tablet computers; MP3 players; smartwatches; wearable computers; smartphones featuring a watch; accessories for computers, telephones, tablet computers, MP3 players, and smartwatches, namely, displays, monitors, protective covers, carrying cases, stands, batteries, battery chargers, headphones, speakers, headsets, microphones, car audio adapters, remote controls, connection cables, power adapters, docking stations, and adapter plugs; spectacles; sunglasses; optical lenses and glasses; spectacle cases; memory cards and integrated circuit cards; downloadable electronic publications in the nature of books, newsletters, catalogs, and brochures in the fields of watches, chronometric instruments, jewelry, apparel, luggage, leather accessories, personal care products, luxury goods, sports, and fashion; electronic sensors, monitors, and displays used to provide and display official time at sporting, cultural, wellness, entertainment, and educational events; electronic connected bracelets and connected cuffs for tracking the movement of people that also have a function of transmitting, and/or receiving data to and/or from personal digital assistants, tablets, smart phones and personal computers through internet websites and other computer and electronic communication networks.</p> <p>IC 014. jewelry; precious stones; horological instruments, namely, watches, wristwatches, and constitutive parts therefor; alarm clocks, clocks and other chronometric instruments, chronometers, chronographs as watches, chronometric apparatus for sports timing, chronometric apparatus for measuring and marking the time; watch bands, watch chains, watch springs, watch dials or watch glasses,</p>
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		<p>watch winders, watch cases being parts of watches, cases and boxes adapted for holding watches; precious metals and their alloys; jewelry cases; boxes of precious metal; key rings, trinkets or fobs of precious metals; cuff links; bracelets; rings; medals; watches that also have a function of transmitting and/or receiving data to and/or from personal digital assistants, tablets, smart phones and personal computers through internet websites and other computer and electronic communication networks; watches containing an electronic game function, watches incorporating a telecommunication function; leather boxes adapted for holding watches</p> <p>IC 016. passport holders and cases</p> <p>IC 018. goods of leather and imitation leather, namely, leather or leatherboard boxes, leather or imitation leather envelopes, travel chests, bags, garment bags for travel, trunks, suitcases, luggage, carrying boxes intended for toiletry articles sold empty, rucksacks, handbags, beach bags, reusable shopping bags, shoulder bags, carrying cases, attaché cases, briefcases, school satchels, under-arm bags, wallets, purses, money pouches, key cases, credit card holders; umbrellas, parasols, sun umbrellas, walking sticks</p> <p>IC 025. clothing, namely, underwear, sweaters, shirts, bodices, corsets, suits, vests, raincoats, skirts, coats, trousers, jumpers, dresses, jackets, shawls, sashes for wear, scarves, neckties, pocket squares, suspenders, gloves, belts, stockings, tights, socks, singlets, bathing suits and bathrobes; footwear; headwear</p> <p>IC 035. retail store services and online retail store services featuring cosmetics, hair care and skin care preparations, perfumes, shaving preparations, toiletries, smartwatches, computers, tablet computers, computer hardware, computer software, computer peripherals, telephones, mobile electronic devices, health, fitness and exercise sensors, monitors and displays, computer gaming</p>
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	5,314,173	August 8, 2017	<p>IC 003. soaps; perfumes; cosmetics, creams, and lotions for the body and hair; shampoos; makeup and makeup removers; lipstick; beauty masks; shaving preparations; after-shave lotions and balms; non-medicated toiletries; deodorants for personal use; leather polishes; preservative creams for leather.</p> <p>IC 009. apparatus for recording, transmission, reproduction, or processing of sound or images; electronic timers and timing sensors; calculating machines; equipment for data processing; timing dials and timing sensors; electronic timers; chronographs for use as specialized time recording apparatus; game software; computer operating software for smartwatches and mobile electronic devices; computer software for sending and receiving electronic mail, text messages, data, photographs, and videos; computer software for accessing, browsing, and searching online databases; computer software for sensing, monitoring, recording, displaying, measuring, and transmitting global positioning, direction, distance, altitude, speed, navigational information, weather information, temperature, physical activity level, heart rate, pulse rate, blood pressure, calories burned, steps taken, and biometric data; computer software for tracking</p>

		<p>and managing information regarding health, fitness, and wellness programs; computer peripherals; telephones; tablet computers; MP3 players; smartwatches; wearable computers; smartphones featuring a watch; accessories for computers, telephones, tablet computers, MP3 players, and smartwatches, namely, displays, monitors, protective covers, carrying cases, stands, batteries, battery chargers, headphones, speakers, headsets, microphones, car audio adapters, remote controls, connection cables, power adapters, docking stations, and adapter plugs; spectacles; sunglasses; optical lenses and glasses; spectacle cases; memory cards and integrated circuit cards; downloadable electronic publications in the nature of books, newsletters, catalogs, and brochures in the fields of watches, chronometric instruments, jewelry, apparel, luggage, leather accessories, personal care products, luxury goods, sports, and fashion; electronic sensors, monitors, and displays used to provide and display official time at sporting, cultural, wellness, entertainment, and educational events; electronic connected bracelets and connected cuffs for tracking the movement of people that also have a function of transmitting, and/or receiving data to and/or from personal digital assistants, tablets, smart phones and personal computers through internet websites and other computer and electronic communication networks.</p> <p>IC 010. health monitoring devices consisting of health, fitness and exercise sensors, heart rate monitors and sensors, pulse rate monitors and sensors, blood pressure monitors and sensors, respiratory monitors and sensors, thermometers, pedometers and monitors and displays for medical use to be worn during exercise and sporting activities.</p> <p>IC 014. jewelry; precious stones; horological instruments, namely, watches, wristwatches, and constitutive parts therefor; alarm clocks, clocks and other chronometric instruments, chronometers, chronographs as watches, chronometric apparatus for sports timing,</p>
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		<p>chronometric apparatus for measuring and marking the time; watch bands, watch chains, watch springs, watch dials or watch glasses, watch winders, watch cases being parts of watches, cases and boxes adapted for holding watches; precious metals and their alloys; jewelry cases; boxes of precious metal; key rings trinkets or fobs of precious metals; cuff links; bracelets; rings; medals; watches that also have a function of transmitting and/or receiving data to and/or from personal digital assistants, tablets, smart phones and personal computers through internet websites and other computer and electronic communication networks; watches containing an electronic game function, watches incorporating a telecommunication function; leather boxes adapted for holding watches.</p> <p>IC 028. computer gaming machines; electronic games other than those adapted for use with television receivers only.</p> <p>IC 035. retail store services and online retail store services featuring cosmetics, hair care and skin care preparations, perfumes, shaving preparations, toiletries, smartwatches, computers, tablet computers, computer hardware, computer software, computer peripherals, telephones, mobile electronic devices, health, fitness and exercise sensors, monitors and displays, computer gaming machines and electronic games, and accessories for computers, telephones, and mobile electronic devices, sunglasses, spectacles, optical lenses and glasses, spectacle cases, jewelry and precious stones, watches, clocks, chronometric instruments, accessories for watches and chronometric instruments, leather goods, leatherware, bags, briefcases, luggage, wallets, purses, umbrellas, clothing, footwear, and headgear; public relations; advertising services for luxury products, namely, cosmetics, perfumes, optical goods, telephones, wearable electronic devices, jewelry, horological products, watches, connected watches, smartwatches, luggage, leatherware, bags, clothing, clothing accessories; business</p>
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		<p>management and organization consultancy in the field of luxury goods.</p> <p>IC 037. repair, overhaul repair, maintenance and polishing of portable/wearable electronic and/or telecommunication devices; repair, overhaul repair, maintenance and polishing of timepieces.</p> <p>IC 038. telecommunications services, namely, personal communication services, ISDN services, telecommunications access services, data transmission and reception services via telecommunication means, and telecommunications gateway services; telecommunication information; communications by computer terminals or by fiber-optic networks; electronic bulletin board services.</p> <p>IC 041. providing information about sporting and cultural activities, fitness, exercise, sports, entertainment, education and training exercise; timing of sports events.</p> <p>IC 044. health assessment services; providing medical information in the fields of health, fitness, and exercise</p>
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