



LOUIS VUITTON MALLETIER v. aaalvsale.com et al

2021 | Cited 0 times | S.D. Florida | April 27, 2021

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA Case No.
21-cv-60790-BLOOM/Valle LOUIS VUITTON MALLETIER, Plaintiff, v. AAALVSALE.COM, et al.,
Defendants. _____/

MOTION FOR ENTRY OF PRELIMINARY INJUNCTION THIS CAUSE Motion for Preliminary Injunction, ECF No. [6 . The Court has carefully considered the Motion, the record in this case, and the applicable law, and is otherwise fully advised.

By the instant Motion, Plaintiff, Louis Vuitton Malletier, moves for entry of a preliminary injunction against Defendants, 1

for alleged violations of the Lanham Act, 15 U.S.C. §§ 1114 and 1125(a) and (d). The Court held a hearing by video conference on April 27, 2021, which was attended by counsel for Plaintiff only. During the hearing, Plaintiff directed the Court to evidence supporting the Motion for Preliminary Injunction. None of the Defendants formally responded to the Motion, nor have they made any appearance or filing in this case, either individually or through counsel. 2

Because Plaintiff has satisfied the requirements for the issuance of a preliminary injunction, the Court grants the Motion.

1 . 2 Plaintiff s counsel was contacted via email by Defendant Number 158 regarding a possible resolution of the matter. However, Defendant Number 158 has not filed any response with the Court as of this date and has not entered any formal appearance, either individually or through counsel.

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2 I. FACTUAL BACKGROUND 3

Plaintiff is the registered owner of the following trademarks, which are valid and registered Louis Vuitton

Trademark

Registration



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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. 1,770,131 May 11, 1993

IC 25. Clothing for men and women, namely, shawls, sashes, scarves; headgear.

1,794,905

September 28,

1993



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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.

3 The factual Motion for Preliminary Injunction, ECF No. [6], and supporting evidentiary submissions. Plaintiff filed declarations and exhibits annexed thereto in support of its Motion for Preliminary Injunction. The declarations are available in the docket at the following entries: Declaration of Hadrien Huet, ECF No. [6-2], and Declaration of Stephen M. Gaffigan, ECF No. [6-3].

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3 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; attaché 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

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. 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, attaché cases, briefcases, and fine leather goods, namely,



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pocket wallets, purses, leather key holders, business card cases, calling card cases, and credit card cases, umbrellas. 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.

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4 2,181,753

August 18,

1998

IC 14. Jewelry, namely, rings, ear rings, bracelets, charms, necklaces, horological instruments, straps for watches, watches, and wrist-watches, and cases for watches. 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, attaché cases, briefcases, and fine leather goods, namely, pocket wallets, purses, leather key holders, business card cases, calling card cases, credit card cases, and umbrellas. 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.

2,361,695 June 27, 2000

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.

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,



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pouches, fine leather goods namely, pocket wallets, purses, key cases, business card cases, credit card cases.

2,399,161

October 31,

2000

IC 25. Clothing and underwear, namely, shirts, polo shirts, t-shirts, waistcoats, raincoats, skirts, coats, trousers, dresses, jackets, shawls, stoles, scarves, neckties, gloves, ties, belts, bathing suits, shoes, boots and sandals, hats.

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5 2,773,107

October 14,

2003

IC 14. Jewelry including rings, earrings, cuff links, bracelets, charms, necklaces, and medallions; horological and chronometric instruments and apparatus, namely, watches, 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; attaché 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. 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

LOUIS VUITTON

2,904,197

November 23,

2004

IC 14: jewelry, namely, rings, earrings, cuff links, bracelets, charms, necklaces, ((tie pins, and medallions; keyrings made of precious metal;)) horological and chronometric instruments, namely, watches, wrist- watches, ((clocks,)) ((alarm clocks;)) straps for wrist- watches and watch cases.



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2,909,003

December 7,

2004

IC 009. Optical instruments and apparatus, namely, spectacles, eyeglasses, spectacle cases. IC 024. Textiles and textile goods, namely, household linen including bed [and bath] linen [, handkerchiefs of textile].

3,107,072 June 20, 2006

IC 09. Spectacles, sunglasses and spectacle cases. 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. 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. 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.

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6 3,576,404

February 17,

2009

IC 18: boxes of leather or imitation leather for packaging and carrying goods, trunks, suitcases, traveling sets comprised of matching luggage, traveling bags, luggage, garment bags for travel, ((vanity cases not fitted,)) toiletry cases sold empty, rucksacks, satchels, handbags, beach bags, leather shopping bags, sling bags, suit carriers, shoulder bags, waist bags, purses, travel cases, briefcases, briefcase-type portfolios, leather pouches, wallets, change purses, key cases, business card cases, calling card cases.

4,192,541



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August 21,

2012

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. 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. IC 14. Jewelry; key rings of precious metal; tie pins; medallions; jewelry boxes; watches; watch bands; alarm clocks; cases for timepieces. 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. 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

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7 document cases; wallets; purses; leather key cases; umbrellas. IC 24. Textiles and textile goods, namely, bath linen, bed linen, table linen, towels, bed covers, textile table cloths. 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. IC 34. Cigar and cigarette cases of leather and imitation leather.

LOUIS VUITTON

4,530,921 May 13, 2014

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. IC 16. Paper bags; boxes of cardboard or paper; cardboard and paperboard envelopes and



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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. 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.

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8 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.

4,614,736

September 30,

2014

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. 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



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holders, pencil tubs, blotting pads, pencils, fountain pens, rubber erasers, pen cases; printing types; printing blocks; table linens of paper. 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. See Declaration of Hadrien Huet, ECF No. [6-2] at ¶ 4; ECF No. [1-3] (containing Certificates of Registration for the Louis Vuitton Marks at issue). The Louis Vuitton Marks are used in connection with the manufacture and distribution of high-quality luxury goods in the categories identified above. See Declaration of Hadrien Huet, ECF No. [6-2] at ¶¶ 4-5.

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9 Defendants, through the fully interactive, 4

commercial Internet websites and supporting domains operating under the domain names identified on Subject Domain Names or sold goods bearing what Plaintiff has determined to be counterfeits, infringements, reproductions, or colorable imitations of the Louis Vuitton Marks. See Declaration of Hadrien Huet, ECF No. [6-2] at ¶¶ 9-11.

Although each Defendant may not copy and infringe each Louis Vuitton Mark for each category of goods protected, Plaintiff has submitted sufficient evidence showing each Defendant has infringed, at least, one or more of the Louis Vuitton Marks. See Declaration of Hadrien Huet, ECF No. [6-2] at ¶¶ 10-11). Defendants are not now, nor have they ever been, authorized or licensed to use, reproduce, or make counterfeits, reproductions, or colorable imitations of the Louis Vuitton Marks. See Declaration of Hadrien Huet, ECF No. [6-2] at ¶¶ 9-11.

reviewed and visually inspected the Internet websites, including images reflecting the various items bearing the Louis Vuitton Marks offered for sale by Defendants through the Internet websites operating under the Subject Domain Names, and determined the products were non-genuine, unauthorized versions of Plaintiff products. See Declaration of Hadrien Huet, ECF No. [6-2] at ¶¶ 10-11.

On April 12, 2021, Plaintiff filed its Complaint, ECF No. [1], against Defendants for trademark counterfeiting and infringement, false designation of origin, cybersquatting, common law unfair competition, and common law trademark infringement. On April 13, 2021, Plaintiff filed its Ex Parte Application for Entry of Temporary Restraining Order and Preliminary Injunction, ECF No. [6]. On April 14, 2021, this Court entered a Temporary Restraining Order,

4 Plaintiff asserts multiple Defendants use some of their Subject Domain Names to act as supporting domain names to direct traffic to their fully-interactive, commercial websites, including those operating under other Subject Domain Names, from which consumers can complete purchases. See Declaration of Stephen M. Gaffigan [5-3] at ¶ 2, n.1.



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10 enjoining Defendants from, among other actions, continuing to manufacture, promote, and/or sell April 14, 2021 Order, Plaintiff served Defendants with a copy of the Complaint together with copies of the Ex Parte Application for Entry of Temporary Restraining Order and Preliminary Injunction, and April 14, 2021 Temporary Restraining Order, thereby providing notice and copies of the April 14, 2021 Temporary Rest Ex Parte Application for Entry of Temporary Restraining Order and Preliminary Injunction via e- corresponding email/online contact form, or via e-

posting copies of the Temporary Restraining Order and all other pleadings and documents on file in this action on the website located at <http://servingnotice.com/Ls37a2/index.html>. Thereafter, Certificates of Service were filed confirming service on each Defendant, ECF Nos. [14], [15], and [16].
II. LEGAL STANDARD

To obtain a preliminary injunction of success on the merits; (2) that irreparable injury will be suffered if the relief is not granted; (3) that the threatened injury outweighs the harm the relief would inflict on the non-movant; and (4) Schiavo ex. rel Schindler v. Schiavo, 403 F.3d 1223, 1225 26 (11th Cir. 2005); see also Inc., 51 F.3d 982, 985 (11th Cir. 1995).

III. ANALYSIS

The declarations Plaintiff submitted in support of its Motion for Preliminary Injunction support the following conclusions of law:

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11 A. Plaintiff has a strong probability of proving at trial that consumers are likely to be confused by Defendants goods bearing counterfeits, reproductions, or colorable imitations of the Louis Vuitton Marks, and that the products Defendants s products that bear copies of the Louis Vuitton Marks;

B. Because of the infringement of the Louis Vuitton Marks, Plaintiff is likely to suffer immediate and irreparable injury if a preliminary injunction is not granted. It clearly appears from the following specific facts, Motion for Preliminary Injunction, and accompanying declarations on file, that immediate and irreparable loss, damage, and injury will result to Plaintiff and to consumers because it is more likely true than not that:

1. Defendants own or control Internet websites, domain names, or website businesses which advertise, promote, offer for sale, and sell products bearing and/or using ; and

2. There is good cause to believe that more counterfeit and infringing products marketplace; that consumers are likely to be misled, confused, and disappointed by the quality of these products; and



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that Plaintiff may suffer loss of sales for its genuine products and an unnatural erosion of the legitimate marketplace in which it operates.

C. The balance of potential harm to Defendants in restraining their trade in counterfeit and infringing branded goods if a preliminary injunction is issued is far outweighed by the potential harm to Plaintiff, its reputation, and its goodwill as a manufacturer and distributor of quality products, if such relief is not issued.

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12 D. The public interest favors issuance of the preliminary injunction to protect palming off of counterfeit goods . IV. CONCLUSION

Accordingly, it is ORDERED AND ADJUDGED Motion, ECF No. [6], is GRANTED as follows:

(1) Each Defendant, its officers, directors, employees, agents, subsidiaries, distributors, and all persons in active concert or participation with any Defendant having notice of this Order are enjoined and restrained, until further Order of this Court:

a. From manufacturing, importing, advertising, promoting, offering to sell,

selling, distributing, or transferring any products bearing the Louis Vuitton Marks, or any confusingly similar trademarks, other than those actually manufactured or distributed by Plaintiff; and b. From secreting, concealing, destroying, selling off, transferring, or

otherwise disposing of: (i) any products, not manufactured or distributed by Plaintiff, bearing and/or using the Louis Vuitton Marks, or any confusingly similar trademarks; or (ii) any evidence relating to the manufacture, importation, sale, offer for sale, distribution, or transfer of any products bearing the Louis Vuitton Marks, or any confusingly similar trademarks. (2) Each Defendant, its officers, directors, employees, agents, subsidiaries, distributors, and all persons in active concert or participation with any Defendant having notice of this Order shall immediately discontinue, until further Order of this Court, the use of the Louis Vuitton Marks or any confusingly similar trademarks, on or in connection with all Internet websites, domain names, or businesses owned and operated, or controlled by them, including the Internet websites operating under the Subject Domain Names;

(3) Each Defendant, its officers, directors, employees, agents, subsidiaries, distributors, and all persons in active concert or participation with any Defendant having notice of

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13 this Order shall immediately discontinue, until further Order of this Court, the use of the Louis Vuitton Marks, or any confusingly similar trademarks within domain name extensions, metatags or other markers within website source code, from use on any webpage (including as the title of cache memory, and any other form of use of such terms which is visible to a computer user or

serves to direct computer searches to Internet websites registered, owned, or operated by each Defendant, including the Internet websites operating under the Subject Domain Names;

(4) Each Defendant shall not transfer ownership of the Subject Domain Names during the pendency of this action, or until further Order of the Court;

(5) Each Defendant shall continue to preserve copies of all computer files relating to the use of any of the Subject Domain Names and shall take all steps necessary to retrieve computer files relating to the use of the Subject Domain Names that may have been deleted before the entry of this Order;

(6) request, the domain name registrar and/or privacy protection service for any of the Subject Domain Names are ordered to disclose to Plaintiff the true identities and contact information of the registrant of the Subject Domain Name;

(7) The domain name registrars for the Subject Domain Names shall immediately, to the extent not already done, assist in changing the registrar of record for the Subject Domain excepting any such domain names which such registrars have been notified in writing by Plaintiff

have been or will be dismissed from this action, or as to which Plaintiff has withdrawn its request to immediately transfer such domain names. To the extent the registrars do not assist in changing the registrars of record for the domains under their respective control within one (1) business day

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14 of receipt of this Order, the top-level domain (TLD) registries, for the Subject Domain Names, or their administrators, including backend registry operators or administrators, within five (5) business days of receipt of this Order, shall change, or assist in changing, the registrar of record for the Subject Domain Names to a holding account with the New Registrar, excepting any such domain names which such registries have been notified in writing by Plaintiff have been or will be dismissed from this action, or as to which Plaintiff has withdrawn its request to immediately transfer such domain names. Upon the change of the registrar of record for the Subject Domain Names, the New Registrar will maintain access to the Subject Domain Names in trust for the Court during the pendency of this action, or until further order of the Court. Additionally, the New Registrar shall immediately institute a temporary 302 domain name redirection which will automatically redirect any visitor to the Subject Domain Names to the following Uniform Resource <http://servingnotice.com/Ls37a2/index.html> whereon copies of the Complaint, this Order, and all



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other documents on file in this action are displayed. Alternatively, the New ect Domain Names, which link the domain names to the IP addresses where their associated websites are hosted, to NS1.MEDIATEMPLE.NET and NS2.MEDIATEMPLE.NET, which will cause the domain names to resolve to the website where copies of the Complaint, this Order, and all other documents on file in this action are displayed. After the New Registrar has effected this change, the Subject Domain Names shall be placed on lock status by the New Registrar, preventing the modification or deletion of the domains by the New Registrar or Defendants;

(8) This Order shall apply to the Subject Domain Names, associated websites, and any other domain names and websites which are being used by Defendants for the purpose of counterfeiting the Louis Vuitton Marks at issue in this action and/or unfairly competing with Plaintiff

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15 on the World Wide Web;

(9) As a matter of law, this Order shall no longer apply to any Defendant or associated domain name dismissed from this action, or as to which Plaintiff has withdrawn its request for a preliminary injunction;

(10) Pursuant to 15 U.S.C. § 1116(d)(5)(D) and Federal Rule of Civil Procedure 65(c), Plaintiff shall maintain its previously posted bond in the amount of Ten Thousand Dollars and Zero Cents (\$10,000.00), as payment of damages to which Defendants may be entitled for a wrongful injunction or restraint, during the pendency of this action, or until further Order of the Court. ase should an application be made in the interest of justice; and

(11) This Order shall remain in effect during the pendency of this action or until further Order of this Court. DONE AND ORDERED in Chambers at Miami, Florida, on April 27, 2021.

_____ BETH BLOOM UNITED STATES DISTRICT JUDGE Copies
to: Counsel of Record

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16 DEFENDANTS BY NUMBER AND SUBJECT DOMAIN NAME

Defendant Number

Defendant / Domain Name 1 aaalvsale.com 2 bestlvbag.com 3 fakeslouisvuitton.com 4
gotlouisvuitton.com 5 louis-sa.com 6 louistore.ru 7 louisvuitton24.com 8 louisvuittonbagmall.com 9
louisvuittonboutique.vip 10 louisvuittoncity.com 11 louisvuittondeal.vip 12 louisvuittonfemme.com



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13 louisvuittonhk.com 14 louisvuittonid.com 15 louisvuitton-id.com 16 louisvuittonid.shop 17 louisvuitton-id.shop 18 louisvuittonmalaysia.shop 19 louisvuittonmode.com 20 louisvuittonn.online 21 louisvuittonn.vip 22 louisvuitton-ph.com 23 louisvuittonph.shop 23 louisvuitton-ph.store 23 louisvuittons.today 23 louisvuittonsg.live 23 louisvuittonsg.world 23 louisvuittonshop.today 24 louisvuittonphpp.com 25 louisvuittonppi.com 26 louisvuittonpro.com 27 louisvuittonpurse.net 28 louisvuittonreplicabags.org 29 louisvuittons.shop 30 louisvuitton-sg.com 31 louisvuitton-sgp.com 32 louisvuittonshop.live 33 louisvuittonshopping.live 34 louisvuittonsolde.com 35 louisvuittonsuperdiscount.shop

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