

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 21-61332-CIV-RUIZ**

CHANEL, INC.,

Plaintiff,

vs.

THE INDIVIDUALS, BUSINESS ENTITIES,
AND UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A,”

Defendants.

/

**PLAINTIFF’S *EX PARTE* MOTION FOR ORDER AUTHORIZING ALTERNATE
SERVICE OF PROCESS ON DEFENDANTS PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 4(f)(3) AND MEMORANDUM OF LAW IN SUPPORT THEREOF**

Plaintiff, Chanel, Inc. (“Chanel” or “Plaintiff”), hereby moves this Honorable Court, on an *ex parte* basis,¹ for an order authorizing alternate service of process on Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule “A” (collectively “Defendants”), brought pursuant to Federal Rule of Civil Procedure 4(f)(3). In support thereof, Chanel submits the following Memorandum of Law.

¹ Chanel is moving for alternate service *ex parte* as Chanel has yet to provide Defendants with notice of this action. On June 29, 2021, Chanel filed its *Ex Parte* Application for Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets (“*Ex Parte* Application for Temporary Restraining Order”) [ECF No. 6], together with the supporting Declarations and Exhibits, which is currently pending before the Court. This Motion makes reference to Chanel’s *Ex Parte* Application for Temporary Restraining Order, and as such, Chanel seeks to prevent premature disclosure of that filing. (See Declaration of Stephen M. Gaffigan in Support of Plaintiff’s *Ex Parte* Motion for Order Authorizing Alternate Service of Process on Defendants [“Gaffigan Decl.”] ¶ 1, n.1, filed herewith.) However, Chanel is filing this Motion so that, in the event Chanel’s *Ex Parte* Application for Temporary Restraining Order and this Motion are granted, Chanel can effectuate service of process pursuant to Rule 4 of the Federal Rules of Civil Procedure simultaneously with providing notice of the Court’s order on Chanel’s *Ex Parte* Application for Temporary Restraining Order. (See *id.*)

I. INTRODUCTION

Defendants are knowingly and intentionally promoting, advertising, distributing, offering for sale, and selling goods bearing counterfeits and infringements of Chanel's registered trademarks within this district and throughout the United States by operating e-commerce stores and interactive photo albums via third-party Internet marketplace, social media, or image hosting websites under their seller identification names and/or via interactive, commercial Internet websites operating under the domain names identified on Schedule "A" hereto (the "Seller IDs and Subject Domain Names").

Pursuant to Federal Rule of Civil Procedure 4(f)(3), Chanel requests an order authorizing service of process on Defendants via electronic mail ("e-mail") and via website posting. Alternate service by e-mail and by posting on a designated website are appropriate and necessary in this case, because Defendants (1) operate via the Internet; and (2) rely on electronic communications to operate their businesses. As such, Chanel has the ability to contact Defendants directly and provide notice of Chanel's claims against them electronically via e-mail. Additionally, Chanel has created a website and will be posting copies of the Complaint, Amended Complaint, this Motion, and all other documents filed in this action. Chanel respectfully submits that an order allowing service of process and service of all filings via e-mail and by posting on a designated website will benefit all parties and the Court by ensuring Defendants receive immediate notice of the pendency of this action and allowing this action to move forward expeditiously. Absent the ability to serve Defendants by e-mail and/or by website posting, Chanel will almost certainly be left without the ability to pursue a remedy.

II. STATEMENT OF FACTS

A. Defendants Have Valid Means of Electronic Contact.

Defendants operate Internet-based businesses and use electronic means of communication

such that Chanel will be able to provide Defendants with notice of this action via e-mail and website posting. (See Gaffigan Decl. ¶¶ 3-9.) As a practical matter, it is necessary for merchants who operate entirely online, such as Defendants, to provide customers with valid electronic means by which customers may contact the merchants to ask questions about the merchants' products, place orders from the merchants, and receive information from the merchants regarding the shipments of orders. Further, e-commerce defendants generally must maintain accurate e-mail addresses where their domain registrars, marketplace platform, social media or image hosting website administrators and payment processors may communicate with them regarding issues related to the maintenance of their domain name, e-commerce store, or photo album accounts and transfer of funds for the payment for goods. Additionally, Chanel has created a serving notice website that will be appearing at the URL <http://servingnotice.com/cp05e/index.html> ("Plaintiff's Website"), such that anyone accessing Plaintiff's Website will find copies of all documents filed in this action. (See *id.* at ¶ 10.)

Specifically, Defendant Numbers 1-21 and 25-49 can be contacted via the onsite contact forms embedded directly on their e-commerce stores, photo albums, or websites. (Gaffigan Decl. ¶ 3.) Moreover, these Defendants have provided at least one accurate contact e-mail address in the form of a PayPal, Inc. ("PayPal") account to Chanel's investigators while conducting business via their respective Seller IDs² and Subject Domain Names. (See *id.*; see also Declaration of Eric Rosaler in Support of Plaintiff's *Ex Parte* Application for Temporary Restraining Order ["Rosaler Decl. in Support of Appl. for TRO"] ¶¶ 4-5 and Comp. Ex. 1 thereto; Declaration of Kathleen

² Defendants 90, 275, 303, and 310, who operate via the non-party Internet marketplace platform Wish.com or DHgate.com, also use money transfer and retention services with PayPal as an additional payment method in connection with its counterfeiting activities. (See Gaffigan Decl. ¶ 3, n.2.)

Burns in Support of Plaintiff's *Ex Parte* Application for Temporary Restraining Order ["Burns Decl. in Support of Appl. for TRO"] ¶¶ 4-5 and Comp. Ex. 1 thereto, incorporated herein by reference.)³ Pursuant to PayPal's Electronic Communications Delivery Policy (E-Sign Disclosure and Consent), PayPal account holders consent to receive all communication electronically, including via e-mail, and are required to maintain a valid e-mail address. If PayPal discovers an e-mail address has become invalid such that electronic communications sent to the e-mail address by PayPal are returned, PayPal may deem the account to be inactive and disable transaction activity until a valid, working e-mail address is provided. (See Gaffigan Decl. ¶ 3.)⁴ Clearly, Defendants' PayPal account e-mail addresses must necessarily be valid, working e-mail addresses; otherwise, Defendants would not be able to process payments through their PayPal accounts. (Id.)

Defendant Numbers 22-24 have provided an electronic form of contact in the form of AliExpress' messaging system. (See Gaffigan Decl. ¶ 4; see also Rosaler Decl. in Support of Appl. for TRO ¶ 4 and Comp. Ex. 1 thereto.) AliExpress' Message Center is a system that facilitates communication between customers and merchants in the AliExpress marketplace.⁵ By using the Message Center, a customer can communicate with an AliExpress merchant in the same way as a real e-mail address. (Gaffigan Decl. ¶ 4.) Moreover, AliExpress allows a customer to see a copy of the e-mail on the Messages Center page in the customer's account. (Id.) AliExpress also

³ Chanel's *Ex Parte* Application for Temporary Restraining Order, together with declarations and exhibits filed in support thereof, [ECF No. 6], are all incorporated herein by reference.

⁴ See PayPal's Electronic Communications Delivery Policy (E-Sign Disclosure and Consent), available at https://www.paypalobjects.com/webstatic/ua/pdf/US/en_US/esign.pdf (last visited June 29, 2021).

⁵ See How to contact seller, available at <https://service.aliexpress.com/page/knowledge?pageId=37&category=1000022034&knowledge=1060073785&language=en#How%20to%20contact%20seller?> (last visited June 29, 2021).

maintains additional contact e-mail addresses for sellers operating via AliExpress, and based upon prior actions, AliExpress identifies these additional contact e-mail addresses for all Defendants at issue upon compliance with a temporary restraining order, such as the temporary restraining order Chanel is requesting in the instant case. (Id.)

Defendant Numbers 50-57 have at least one method of electronic communication, such as e-mail via the online contact form associated with their respective e-commerce stores operating under the Seller IDs in the form of Amazon's Buyer-Seller Messaging Service. (See Gaffigan Decl. ¶ 5; see also Burns Decl. in Support of Appl. for TRO ¶ 4 and Comp. Ex. 1 thereto.) Amazon's Buyer-Seller Messaging Service is a system that facilitates communication between customers and merchants in the Amazon marketplace. (Id.) By using the Buyer-Seller Messaging Service, a customer can communicate with an Amazon merchant via a unique anonymized e-mail address. (Id.) This anonymized e-mail alias is treated in the same way as a real e-mail address.⁶ (Id.) E-mails sent via Amazon's Buyer-Seller Messaging Service are routed to the merchant via the anonymized e-mail address. (Id.) Additionally, Amazon maintains a history of all e-mails routed through its system, and allows a customer to see a copy of the e-mail on the Messages page in the customer's account. (Id.) More importantly, customers are automatically notified when an e-mail message is not delivered to the merchant, or the merchant's e-mail address is invalid. (Id.) Amazon also maintains additional contact e-mail addresses for sellers operating via Amazon.com, and based upon multiple past actions, Amazon identifies these additional contact e-mail addresses for all Defendants at issue upon compliance with a temporary restraining order, such as the temporary restraining order Chanel is requesting in the instant case. (Id.)

⁶ See Amazon's Buyer-Seller Messaging Service, available at http://www.amazon.com/gp/help/customer/display.html/ref=hp_rel_topic?ie=UTF8&nodeId=200441890 (last visited June 29, 2021).

Defendant Numbers 58-247, operate their respective e-commerce stores via the Internet marketplace website, Wish.com (“Wish”), and have at least one method of electronic communication via online contact in the form of Wish’s messaging system. (Gaffigan Decl. ¶ 6.) Wish’s messaging system facilitates communication between customers and merchants in the Wish marketplace through the customer’s Order History webpage. (Id.) Additionally, ContextLogic, Inc., which operates the Wish.com website, maintains contact e-mail addresses for sellers operating via Wish, and based upon past actions, ContextLogic, Inc. identifies these additional contact e-mail addresses for Defendants at issue upon compliance with a temporary restraining order, such as the temporary restraining order Chanel is requesting in the instant case. (Id.)

Defendant Numbers 248-349 have provided an electronic form of contact in the form of DHgate.com’s (“DHgate”) messaging system.⁷ (See Gaffigan Decl. ¶ 7.) DHgate’s “Ask seller a question” function is a system that facilitates communications between customers and merchants in DHgate’s marketplace platform. (Id.) DHgate also maintains additional contact e-mail addresses for sellers operating via the DHgate platform, and based upon past actions, DHgate identifies these additional contact e-mail addresses for Defendants at issue upon compliance with a temporary restraining order, such as the temporary restraining order Chanel is requesting in the instant case. (Id.)

Chanel’s counsel also obtained the publicly available domain name registration records for the Subject Domain Names identifying the contact e-mail addresses Defendant Numbers 26-49 provided their domain name registrars. (See Gaffigan Decl. ¶ 8.) Also, the available e-mail addresses identified in connection with these Defendants’ respective Internet websites were obtained. (Id.)

⁷ See “Contacting Your Seller,” available at <https://www.dhgate.com/html/services/win-contact.html> (last visited June 29, 2021).

Defendants are further able to receive notice of this action by e-mail via the e-commerce marketplace platforms, social media websites, and image hosting websites that Defendants use to conduct their commercial transactions via their Seller IDs, including the private messaging applications and/or services such as WhatsApp, Wechat, and Instagram.com, and e-mail accounts Defendants use in tandem with their e-commerce stores and interactive photo albums, or via their designated domain name registrar's e-mail address or domain contact form for their Internet websites. (See id. at ¶ 9.)

Finally, Chanel will be able to provide each Defendant notice of this action via public announcement on Chanel's designated website. Chanel has created its Website that will be appearing at the URL <http://servingnotice.com/cp05e/index.html>, whereon copies of the Complaint, Amended Complaint, this Motion, and all other pleadings, documents, and orders issued in this action will be posted, such that anyone accessing Plaintiff's Website will find copies of all documents filed in this action. (See Gaffigan Decl. ¶ 10.) The address for Plaintiff's Website will be provided to Defendants via their known e-mail accounts, and will be included as part of service of process in this matter. (Id.)

Accordingly, each Defendant will be provided with notice of this action electronically by providing the address to Plaintiff's Website to their corresponding e-mail addresses, customer service e-mail addresses and/or onsite contact forms, or via their e-commerce marketplace platforms, social media or image hosting websites and corresponding private messaging applications and/or services, or via their designated domain name registrars that Defendants use to conduct their commercial transactions via the Seller IDs and Subject Domain Names.⁸ (Gaffigan

⁸ The e-mail addresses and other means of electronic contact for Defendants are provided on Schedule "A" hereto. (See Gaffigan Decl. ¶ 8.)

Decl. ¶¶ 9, 11.) In this manner, Defendants will receive a web address at which they will be able to access all electronic filings to view, print, or download any document filed in the case similar to the court's CM/ECF procedures. (Id. at ¶ 11.)

B. Defendants Rely on Electronic Communications.

Defendants have structured their e-commerce store businesses so that the means for customers to purchase Defendants' counterfeit and infringing goods at issue is by placing an order electronically. Defendants take and confirm orders online or via electronic messaging and rely on electronic means to receive payment. (See Rosaler Decl. in Support of Appl. for TRO ¶ 4 and Comp. Ex. 1 thereto; Burns Decl. in Support of Appl. for TRO ¶ 4 and Comp. Ex. 1 thereto.) Indeed, Chanel's investigators placed orders electronically via each Defendant's e-commerce store, photo album, or Internet website operating under its respective Seller ID or Subject Domain Name, which included providing shipping and billing information via e-mail and/or via other electronic methods. (See id.) Clearly, Defendants rely on electronic means as reliable forms of contact.

III. ARGUMENT

Pursuant to Federal Rule of Civil Procedure 4(h)(2), a foreign partnership or other unincorporated association may be served with process in any manner prescribed by Rule 4(f) for serving foreign individuals. Federal Rule of Civil Procedure 4(f)(3), allows a district court to authorize an alternate method for service to be effected upon a foreign defendant, provided that it is not prohibited by international agreement and is reasonably calculated to give notice to the defendant. In the present matter, alternate service of process via e-mail and by posting on Plaintiff's Website are appropriate given that Defendants have established Internet-based businesses by which they rely on electronic communication for their operation. Accordingly, this

Court should permit service on Defendants by e-mail and website posting.

A. The Court May Authorize Service via Electronic Mail and Website Posting Pursuant to Federal Rule of Civil Procedure 4(f)(3).

Federal Rule of Civil Procedure 4(h)(2) allows a foreign business entity to be served with process “in any manner prescribed by Rule 4(f),” including any manner ordered under Rule 4(f)(3). U.S. Commodity Futures Trading Comm’n v. Aliaga, 272 F.R.D. 617, 619 (S.D. Fla. 2011). A foreign partnership or other unincorporated association can therefore be served in the same manner as serving a foreign individual pursuant to Rule 4(f)(3). Id. Federal Rule of Civil Procedure 4(f)(3) allows alternative methods for service of process, so long as those methods are not prohibited by international agreement and are directed by the Court. See Prewitt Enters., Inc. v. The Org. of Petrol. Exporting Countries, 353 F.3d 916, 923 (11th Cir. 2003). See also Brookshire Bros., Ltd. v. Chiquita Brands Int’l, Case No. 05-CIV-21962, 2007 WL 1577771, at *2 (S.D. Fla. May 31, 2007); Rio Props. Inc. v. Rio Int’l Interlink, 284 F.3d 1007, 1014 (9th Cir. 2002). In fact, “as long as court-directed and not prohibited by an international agreement, service of process ordered under Rule 4(f)(3) may be accomplished in contravention of the laws of the foreign country.” Chanel, Inc. v. Zhixian, Case No. 10-cv-60585-JIC, 2010 WL 1740695, at *3 (S.D. Fla. April 29, 2010) (quoting Rio Props., Inc., 284 F.3d at 1014 and citing Mayoral–Amy v. BHI Corp., 180 F.R.D. 456, 459 n.4 (S.D. Fla. 1998)).

The plain language of Rule 4(f)(3) reflects that the decision to issue an order allowing an alternate means of service lies within the sole discretion of the District Court. Prewitt Enters., Inc., 353 F.3d at 921; Rio Props., Inc., 284 F.3d at 1116. See, e.g., Brookshire Bros., Ltd., 2007 WL 1577771, at *2 (noting that “district courts have broad discretion under Rule 4(f)(3) to authorize other methods of service”); In re Int’l Telemedia Assocs., 245 B.R. 713, 720 (N.D. Ga. 2000) (noting that Rule 4(f)(3) is designed to allow courts discretion and broad flexibility to tailor the

methods of service for a particular case). Rule 4 does not require a party attempt service of process by those methods enumerated under subsections (f)(1) and (f)(2), including by diplomatic channels and letters rogatory, before petitioning the court for alternative relief under subsection 4(f)(3). Rio Props., Inc., 284 F.3d at 1114-15; see also Brookshire Bros., Ltd., 2007 WL 1577771, at *1.

In Brookshire, the Honorable Judge Marcia G. Cooke allowed substitute service on a party's attorney pursuant to Rule 4(f)(3) holding as follows:

Rule 4(f)(3) is one of three separately numbered subsections in Rule 4(f) and each subsection is separated from the one previous merely by the simple conjunction 'or.' Rule 4(f)(3) is not subsumed within or in any way dominated by Rule 4(f)'s other subsections; it stands independently, on equal footing. Moreover, no language in Rules 4(f)(1) or 4(f)(2) indicates the primacy, and certainly Rule 4(f)(3) indicates no qualifiers or limitations which indicate its availability only after attempting service of process by other means.

Brookshire Bros., Ltd., 2007 WL 1577771, at *1 (quoting Rio Props., Inc., 284 F.3d at 1015). Accord TracFone Wireless, Inc. v. Bitton, 278 F.R.D. 687, 692 (S.D. Fla. Jan. 11, 2012) (noting that, in regards to Rule 4(f)(3), "there is no indication from the plain language of the Rule that the three subsections, separated by the disjunctive "or," are meant to be read as a hierarchy."). Judge Cooke further held, "[t]he invocation of Rule 4(f)(3), therefore, is neither a last resort nor extraordinary relief." Brookshire Bros., Ltd., 2007 WL 1577771, at *2.

Additionally, the Constitution itself does not mandate that service be effectuated in any particular way. Rather, Constitutional due process considerations require only that the method of service selected be "reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections." Brookshire Bros., Ltd., 2007 WL 1577771, at *1 (quoting Mullane v. Cent. Hanover Bank & Trust Co., 339 U.S. 306, 314 (1950)); see also TracFone Wireless, Inc., 278 F.R.D. at 692; Rio Props., Inc., 284 F.3d at 1016. Accordingly, federal courts have allowed a variety of alternative service methods, including service by e-mail and service by posting on a designated website, where a

plaintiff demonstrates the likelihood that the proposed alternative method of service will notify a defendant of the pendency of the action. See, e.g., Rio Props., Inc., 284 F.3d at 1017 (holding, “without hesitation,” that e-mail service of an online business defendant “was constitutionally acceptable”); In re Int’l Telemedia Assocs., 245 B.R. at 721 (“If any methods of communication can be reasonably calculated to provide a defendant with real notice, surely those communication channels utilized and preferred by the defendant himself must be included among them.”); National Association for Stock Car Auto Racing, Inc. v. Does, 584 F. Supp. 2d 824, 826 (W.D.N.C. 2008) (in “acknowledging the realities of the twenty-first century and the information age, the Court determined that the most appropriate place for publication was [plaintiff’s website].”).

Here, service on Defendants by e-mail and/or by posting on Plaintiff’s Website will satisfy due process by apprising them of the action and giving them the opportunity to answer Chanel’s claims. Based upon Chanel’s investigation, each Defendant has at least one form of electronic means of contact, demonstrating that this means of contact is not just effective, but the most reliable means of communicating with that Defendant, and consequently, the most reliable means of providing Defendants with notice of this action. (See Gaffigan Decl. ¶¶ 3-9; Rosaler Decl. in Support of Appl. for TRO ¶ 4 and Comp. Ex. 1 thereto; Burns Decl. in Support of Appl. for TRO ¶ 4 and Comp. Ex. 1 thereto.) Moreover, service by posting on Plaintiff’s Website will be an additional source of reliability as Defendants will be able to see copies of the Complaint, Amended Complaint, and all other documents in this matter electronically via their Internet browser. (Gaffigan Decl. ¶ 10.) The suggested methods are the most reliable means of providing Defendants with notice of this action.

E-mail service on an online business defendant is appropriate and constitutionally acceptable in a case such as this when the plaintiff has proven that e-mail is the most effective

means of providing the defendant notice of the action. See Rio Props., Inc., 284 F.3d at 1017 (concluding “not only that service of process by e-mail was proper—that is, reasonably calculated to apprise [the defendant] of the pendency of the action and afford it an opportunity to respond—but in this case, it was the method of service most likely to reach [the defendant].”). See also Popular Enters., LLC v. Webcom Media Group, Inc., 225 F.R.D. 560, 562 (E.D. Tenn. 2004) (“Under the facts and circumstances presented here, Rule 4(f)(3) clearly authorizes the court to direct service upon defendant by e-mail. The rule is expressly designed to provide courts with broad flexibility in tailoring methods of service to meet the needs of particularly difficult cases. Such flexibility necessarily includes the utilization of modern communication technologies to effect service when warranted by the facts”) (citation omitted). The Rio Properties, Inc. and Popular Enters., LLC courts each determined e-mail service to be appropriate in part because, as in this case, the defendants conducted their businesses online, used e-mail regularly in their businesses, and encouraged parties to contact them via e-mail. Id.

In cases that are factually similar to this one, a number of Courts have held that alternate forms of service pursuant to Rule 4(f)(3), such as e-mail service, are appropriate and may be the only means of effecting service of process “when faced with an international e-business scofflaw.” Rio Properties, Inc., 284 F.3d at 1018; see also Chanel, Inc. v. Zhixian, 2010 WL 1740695, at *3 (e-mail service “reasonably calculated to notify Defendants of the pendency of this action and provide him with an opportunity to present objections.”); TracFone Wireless, Inc., 278 F.R.D. at 693 (finding that service of process by e-mail was reasonably calculated to apprise the defendants of the action and give it an opportunity to respond); Popular Enters., LLC, 225 F.R.D. at 563 (same); In re Int’l Telemedia Associates, 245 B.R. at 722 (“A defendant should not be allowed to evade service by confining himself to modern technological methods of communication not

specifically mentioned in the Federal Rules. Rule 4(f)(3) appears to be designed to prevent such gamesmanship by a party” (concluding e-mail and facsimile service to be appropriate)); Chanel, Inc. v. Zhibing, Case No. 09-cv-02835, 2010 WL 1009981, at *4 (W.D. Tenn. March 17, 2010) (stating that e-mail service has the “greatest likelihood” of reaching e-commerce merchants and noting, “The federal judiciary’s own CM/ECF system alerts parties . . . by e-mail messages.” Alternate service via e-mail granted).⁹ Chanel submits that allowing e-mail service in the present case is appropriate and comports with constitutional notions of due process, particularly given Defendants’ decision to conduct their illegal businesses using the Internet and utilizing e-mail as a primary means of communication.

Additionally, service of a defendant by posting on a designated website, such as a plaintiff’s website, has been deemed an appropriate means of service by posting. See National Association for Stock Car Auto Racing, Inc., 584 F. Supp. 2d at 826.¹⁰ A proposed method of

⁹ See Chanel, Inc. v. Individuals, P’ships & Unincorporated Ass’ns Identified on Schedule “A”, Case No. 21-cv-60813-RAR (S.D. Fla. Apr. 19, 2021) (Order authorizing alternate service of process, *inter alia*, via email); Chanel, Inc. v. Individuals, P’ships & Unincorporated Ass’ns Identified on Schedule “A”, Case No. 21-cv-60308-RAR (S.D. Fla. Feb. 9, 2021) Chanel, Inc. v. Individuals, P’ships & Unincorporated Ass’ns Identified on Schedule “A”, Case No. 20-cv-62121-RAR (S.D. Fla. Nov. 3, 2020) (same); Chanel, Inc. v. Individuals, P’ships & Unincorporated Ass’ns, Case No. 20-cv-61558-RAR (S.D. Fla. Aug. 26, 2020) (same); MPL Communications Limited v. Individuals, P’ships & Unincorporated Ass’ns, Case No. 20-cv-61418-RAR (S.D. Fla. July 17, 2020) (same); adidas AG v. Individuals, P’ships & Unincorporated Ass’ns, Case No. 20-cv-61146-RAR (S.D. Fla. June 16, 2020) (same); see also Richemont Int’l SA v. Cartierlove2u.com, No. 19-61968-CIV-DIMITROULEAS, 2019 U.S. Dist. LEXIS 170355 (S.D. Fla. Aug. 8, 2019) (same); Malletier v. Individuals, No. 19-61021-CIV-COOKE, 2019 U.S. Dist. LEXIS 170354 (S.D. Fla. April 26, 2019) (Hunt, J.) (same).

¹⁰ See also, Chanel, Inc. v. Individuals, P’ships & Unincorporated Ass’ns Identified on Schedule “A”, Case No. 21-cv-60813-RAR (S.D. Fla. Apr. 19, 2021) (Order granting alternative service via e-mail service and by posting on plaintiff’s designated website); Chanel, Inc. v. Individuals, P’ships & Unincorporated Ass’ns Identified on Schedule “A”, Case No. 21-cv-60308-RAR (S.D. Fla. Feb. 9, 2021) (same); Chanel, Inc. v. Individuals, P’ships & Unincorporated Ass’ns Identified on Schedule “A”, Case No. 20-cv-62121-RAR (S.D. Fla. Nov. 3, 2020) (same); Chanel, Inc. v. Individuals, P’ships & Unincorporated Ass’ns, Case No. 20-cv-61558-RAR (S.D. Fla. Aug. 26,

website posting need only be “reasonably calculated under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections.” National Association for Stock Car Auto Racing, Inc., 584 F. Supp. 2d at 826 (citing Mullane v. Cent. Hanover Bank & Trust Co., 339 U.S. 306, 315-16, 70 S. Ct. 652, 94 L. Ed. 865 (1950)). In National Association for Stock Car Auto Racing, Inc. v. Does, the United States District Court for the Western District of North Carolina determined that the plaintiff could serve “Doe” defendants and apprise those defendants of a pending preliminary injunction hearing by posting on the plaintiff’s website. Id.

Accordingly, Chanel has created its Website that will be appearing at the URL <http://servingnotice.com/cp05e/index.html>, whereon copies of the Complaint, Amended Complaint, this Motion, and all other pleadings, documents, and orders issued in this action will be posted. (Gaffigan Decl. ¶ 10.) The address for Plaintiff’s Website will be provided to Defendants via their known e-mail accounts and onsite contact forms, and will be included as part of service of process in this matter. (Id.) Chanel respectfully submits that alternative service by posting the Summonses, Complaint, and Amended Complaint on Plaintiff’s Website will provide notice to Defendants sufficient to meet the due process requirements for service of process pursuant to Federal Rule of Civil Procedure 4, apprise Defendants of the pendency of this action, and afford Defendants and any other interested parties an opportunity to present their answers and objections.

2020) (same); MPL Communications Limited v. Individuals, P’ships & Unincorporated Ass’ns, Case No. 20-cv-61418-RAR (S.D. Fla. July 17, 2020) (same); adidas AG v. Individuals, P’ships & Unincorporated Ass’ns, Case No. 20-cv-61146-RAR (S.D. Fla. June 16, 2020) (same); see also Richemont Int’l SA v. Cartierlove2u.com, No. 19-61968-CIV-DIMITROULEAS, 2019 U.S. Dist. LEXIS 170355 (S.D. Fla. Aug. 8, 2019) (same); Malletier v. Individuals, No. 19-61021-CIV-COOKE, 2019 U.S. Dist. LEXIS 170354 (S.D. Fla. April 26, 2019) (Hunt, J.) (same).

B. Service of Process Via Electronic Means Are Not Prohibited by International Agreement.

Service via e-mail and via posting on a designated website are not prohibited by international agreement. Based upon the information provided in connection with Defendants' e-commerce stores, photo albums, and Internet websites operating under their respective Seller IDs and Subject Domain Names, including the payment and shipping information, and the investigative data provided thereunder, Chanel has good cause to suspect Defendants are residing in the People's Republic of China ("China"), the Republic of the Philippines ("Philippines"), Spain, United Arab Emirates, United Kingdom of Great Britain and Northern Ireland ("UK"), the Socialist Republic of Viet Nam ("Vietnam"), or other foreign jurisdictions, and/or redistribute products from sources in those locations.¹¹ (Gaffigan Decl. ¶ 12.) The United States, China, Philippines, Spain, UK, and Vietnam are signatories to the Hague Convention on the Service Abroad of Judicial and Extra-Judicial Documents in Civil and Commercial Matters (the "Hague Service Convention").¹² (See Gaffigan Decl. ¶ 13 and Comp. Ex. 1 thereto, Hague Service Convention and list of signatory Members.) The Hague Service Convention does not preclude the Court from authorizing service of process via e-mail or posting on a designated website. Additionally, there are no other treaties between the United States and the United Arab Emirates which governs service of process in a civil matter. (See Gaffigan Decl. ¶ 13, n.12.) Thus, there are no international agreements prohibiting service by e-mail or posting on a designated website. (Id.)

¹¹ Upon information and belief, some Defendants ship their goods to fulfillment centers within the United States to redistribute their products from those locations, but likely reside and/or operate in foreign jurisdictions. (See Complaint ¶ 7, [ECF No. 1]; see also Gaffigan Decl. ¶ 12, n.7.)

¹² United Arab Emirates is not a signatory to the Hague Convention.

Alternative means of service, such as e-mail and website posting, are not prohibited by the Hague Service Convention where a signatory nation has not expressly objected to those means. See Stat Med. Devices, Inc. v. HTL-Strefa, Inc., Case No. 15-cv-20590-FAM, 2015 U.S. Dist. LEXIS 122000 (S.D. Fla. Sept. 14, 2015) (noting that an objection to the alternative forms of service set forth in the Hague Convention is limited to the forms of service expressly objected to).¹³ Article 10 to the Hague Service Convention allows service of process through means other than a signatory's Central Authority, such as "postal channels" and "judicial officers," provided the State of destination does not object to those means. See Hague Convention, Art. 10, 20 U.S.T. 361 (1969). China, Philippines, UK, and Vietnam have objected, either fully or partially, to the alternative means of service outlined in Article 10 of the Convention.¹⁴ (Gaffigan Decl. ¶ 13.) However, these objections are specifically limited to the means of service enumerated in Article 10, and neither China, Philippines, UK, nor Vietnam has expressly objected to service via e-mail or website posting. (See id. and Comp. Ex. 1 thereto, which includes a true and correct printout of China's, Philippines, Spain's, UK's, and Vietnam's Declaration/Reservation/Notification in

¹³ See Chanel, Inc. v. Individuals, P'ships & Unincorporated Ass'ns Identified on Schedule "A", Case No. 21-cv-60813-RAR (S.D. Fla. Apr. 19, 2021) (authorizing e-mail service and by posting on plaintiff's designated website, noting an objection to the alternative means of service provided by the Hague Convention is expressly limited to those means and does not represent an objection to other forms of service, such e-mail or posting); Chanel, Inc. v. Individuals, P'ships & Unincorporated Ass'ns Identified on Schedule "A", Case No. 21-cv-60308-RAR (S.D. Fla. Feb. 9, 2021) (same); Chanel, Inc. v. Individuals, P'ships & Unincorporated Ass'ns Identified on Schedule "A", Case No. 20-cv-62121-RAR (S.D. Fla. Nov. 3, 2020) (same); Chanel, Inc. v. Individuals, P'ships & Unincorporated Ass'ns, Case No. 20-cv-61558-RAR (S.D. Fla. Aug. 26, 2020) (same); MPL Communications Limited v. Individuals, P'ships & Unincorporated Ass'ns, Case No. 20-cv-61418-RAR (S.D. Fla. July 17, 2020) (same); adidas AG v. Individuals, P'ships & Unincorporated Ass'ns, Case No. 20-cv-61146-RAR (S.D. Fla. June 16, 2020) (same); see also Richemont Int'l SA v. Cartierlove2u.com, No. 19-61968-CIV-DIMITROULEAS, 2019 U.S. Dist. LEXIS 170355 (S.D. Fla. Aug. 8, 2019) (same); Malletier v. Individuals, No. 19-61021-CIV-COOKE, 2019 U.S. Dist. LEXIS 170354 (S.D. Fla. April 26, 2019) (Hunt, J.) (same).

¹⁴ Spain does not object to the alternate means of service, including postal channels, as outlined in Article 10 of the convention. (See Gaffigan Decl. ¶ 13, n.10.)

regards to the Hague Convention.) Because the declarations to the Hague Convention filed by China, Philippines, UK, and Vietnam do not object to e-mail and website posting service, “a court acting under Rule 4(f)(3) remains free to order alternative means of service that are not specifically referenced in Article [10].” Gurung v. Malhotra, 279 F.R.D. 215, 219 (S.D.N.Y. 2011); see also WhosHere, Inc. v. Orun, Case No. 13-cv-00526-AJT, 2014 U.S. Dist. LEXIS 22084, at *9 (E.D. Va. Feb. 20, 2014) (authorizing e-mail service, noting objection to means of service listed in Article 10 “is specifically limited to the enumerated means of service in Article 10.”).

Moreover, an objection to the alternative means of service provided in Article 10 does not represent a *per se* objection to other forms of service, such e-mail or website posting. See In re S. African Apartheid Litig., 643 F. Supp. 2d 423, 434, 437 (S.D.N.Y. 2009) (requiring express objection to alternative method of service by signatory nation to preclude that particular means of service). Consequently, China’s, Philippines, UK’s, and Vietnam’s objections to the means of alternative service provided in Article 10 are no bar to court-directed service and does not prevent this Court from authorizing alternative service of process via e-mail or website posting. See, e.g., Gurung, 279 F.R.D. at 220 (approving service of process on foreign defendants via e-mail despite India’s objection to Article 10, stating that an “objection to service through postal channels does not amount to an express rejection of service via electronic mail.”); Stat Med. Devices, Inc., 2015 U.S. Dist. LEXIS 122000, at *8-9 (permitting service of process on foreign defendants via e-mail and substituted service on domestic counsel despite Poland’s objection to Article 10, noting “This Court and many other federal courts have permitted service by electronic mail and determined that an objection to Article 10 of the Hague Convention . . . does not equate to an express objection to service via electronic mail.”); FTC v. PCCare247 Inc., Case No. 12-cv-7189-PAE, 2013 U.S. Dist. LEXIS 31969, at *10 (S.D.N.Y. March 7, 2013) (authorizing service of process via e-mail and

Facebook, explaining that “Numerous courts have held that service by email does not violate any international agreement where the objections of the recipient nation are limited to those means enumerated in Article 10.”); WhosHere, Inc., 2014 U.S. Dist. LEXIS 22084 (authorizing service of process on foreign defendants via e-mail despite Turkey’s objection to Article 10); Richmond Techs., Inc. v. Aumtech Bus. Solutions, Case No. 11-CV-02460-LHK, 2011 U.S. Dist. LEXIS 71269 (N.D. Cal. July 1, 2011) (“[N]umerous courts have authorized alternative service under Rule 4(f)(3) even where the Hague Convention applies. This is true even in cases involving countries that, like India, have objected to the alternative forms of service permitted under Article 10 of the Hague Convention.”).

IV. CONCLUSION

For the foregoing reasons, Plaintiff, Chanel, Inc., respectfully requests this Court grant the present motion and authorize service of the Summonses, Complaint, Amended Complaint, and all filings and discovery in this matter upon each Defendant in this action:

(1) via e-mail by providing the address to Plaintiff’s Website to Defendants via the e-mail accounts provided by that Defendant (i) as part of the data related to its e-commerce store, photo album, or domain name, including customer service e-mail addresses and onsite contact forms, or (ii) via the e-commerce marketplace, social media, or image hosting website e-mail for each of the e-commerce stores and photo albums, including private messaging applications and/or services, or (iii) via the registrar of record for the domain name, or

(2) via website posting by posting a copy of the Summonses, Complaint, Amended Complaint, and all filings and discovery in this matter on Plaintiff’s Website appearing at the URL <http://servingnotice.com/cp05e/index.html>.

DATED: June 29, 2021.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **Stephen M. Gaffigan**

Stephen M. Gaffigan (Fla. Bar No. 025844)

Virgilio Gigante (Fla. Bar No. 082635)

T. Raquel Wiborg-Rodriguez (Fla. Bar No. 103372)

401 East Las Olas Blvd., Suite 130-453

Ft. Lauderdale, Florida 33301

Telephone: (954) 767-4819

E-mail: Stephen@smgpa.net

E-mail: Leo@smgpa.net

E-mail: Raquel@smgpa.net

Attorneys for Plaintiff, CHANEL, INC.

SCHEDULE “A”
DEFENDANTS BY NUMBER, SELLER ID, SUBJECT DOMAIN NAME,
AND MEANS OF CONTACT

Def. No.	Defendant / Seller ID / Subject Domain Name	Means of Contact
1	analuxuryfashion	bertonlea@hotmail.com WhatsApp: +8617603061115
2	bolsos_1.v_chanel	anabediva50@outock.pt Instagram Messenger WhatsApp: +34 642 06 07 16
3	chanel.dio.lv.gucci	hermesezzhermes@gmail.com Instagram Messenger Wechat: 6240012
4	chenhuaying8	2335817488@qq.com Instagram Messenger WhatsApp: +86 157 7979 1355
5	cuiyeye2	5175299@qq.com WhatsApp: +8613178238800
6	eva.brand.goods	evayu891201@gmail.com WhatsApp: +0086-18149704790
7	furshoes_warehouse	1193752402@qq.com WhatsApp: +8619142092599
8	hushbegs	apanhwar3@gmail.com Instagram Messenger
9	kelly_shoes1	287821339@qq.com Instagram Messenger
10	lina9869832 yisa09889	986983287@qq.com Instagram Messenger WhatsApp: +8617689451819 WhatsApp: +8613615998061
11	love_brand_collection	2493486587@qq.com Instagram Messenger
12	luxury.storeglobal	lareinaguo77@gmail.com Instagram Messenger
13	luxuryshoesbags86	2583151893@qq.com Instagram Messenger WhatsApp: 8617665237415
14	meizi_2013168_g	1649366167@qq.com WhatsApp: +8615813635980
15	merrykick	ericsheng20@outlook.com WhatsApp: +8618858408171
16	moengyunxun yifeichong36241	fashionchen1005@outlook.com WhatsApp: +8618100591850 WhatsApp: +8615080190129
17	nancyhenrybbbag2020	13621488409@163.com Instagram Messenger WhatsApp: +86 136 2148 8409

18	worlds_brand_store76	mrsilent0tear@gmail.com WhatsApp: +92 305 6748554
19	yaojiany	cuiyuhui1@126.com WhatsApp: +8613386924492
20	yiyanbags	1814574538@qq.com Instagram Messenger WhatsApp: +8613760843667
21	yofashionvip	1161646254@qq.com Instagram Messenger
22	brenda84819 aka Shop900250100 Store	https://brenda84819.x.yupoo.com https://www.aliexpress.com/store/900250100 AE-Alipay@service.alibaba.com WhatsApp: 008613530531210
23	hankyang0117 aka Shop911259040 Store	https://hankyang0117.x.yupoo.com https://www.aliexpress.com/store/911259040 AE-Alipay@service.alibaba.com
24	2589 Store	https://www.aliexpress.com/store/911603835 AE-Alipay@service.alibaba.com
25	A-kuei	965553355@qq.com WhatsApp: +86 159 9975 7613
26	521bags.com	ligezhang0@gmail.com service@521bags.com support@tiktokhotpop.com pw-fcea6e16dc0a432c610c581efc46421c@privacyguardian.org WhatsApp: +1 2095651228
27	areaglam.com	falcosstore10@gmail.com info@areaglam.com areaglam.com@contactprivacy.com
28	blessedbedding.com	ntuan8438@gmail.com support@blessedbedding.com 9028c8495a7f4d5faf28c016c0a6b593.protect@withheldforprivacy.com
29	bolsoslvchanel.com	jhostyndiaz25@gmail.com
30	depurses.ru aka purse_inspiration	keanyongtan91@gmail.com desacpurse@gmail.com WhatsApp: 60165425482 WhatsApp: 8618666021721
31	dtcbags.com	pp869788680@jackwzm.cn service@dtcbags.com WhatsApp: +1 561-292-9603
32	extrain.com	lehuephuong46933@gmail.com support@extrain.com
33	lemaisonparis.com	jabouzasrendal@icloud.com order@lemaisonparis.com 5c3b7666f422406eafef70ba1ba5df12.protect@whoisguard.com WhatsApp: +1 302 4401 725
34	luxurybag.xyz	zhong1995ju0202@gmail.com WhatsApp: 8618826227375

35	luxurybagweb.com	paypal@tradinggogo.com Mell.Billi@gmx.com WhatsApp:+8618677773661
36	offstreetunit.com	info@offstreetunit.com offstreetunit.com@contactprivacy.com
37	todadivaofficial.com	sales@todadivaofficial.com info@todadivaofficial.com todadivaofficial.com@contactprivacy.com
38	wereplica.com	ulisfyha@gmail.com wereplica@gmail.com
39	womyshop.com	kristinbazar99@gmail.com womyshop21@gmail.com 8b5d341c44894bc781a944311307f9b7.protect@withheldforprivacy.com WhatsApp: +1(579) 390-3848
40	corwin.store bluerd.shop buebu.shop feieagle.shop iluivo.shop incco.shop ofore.store seerlin.shop	james745119@gmail.com hanli135790@gmail.com hello@nova.com YT@gmail.com
41	raretail.com delightfuts.com factiones.com ignoreds.com ongoinges.com pendinggets.com beliefal.com amountes.com gloriousion.com dawnise.com shineian.com yeaing.com	hotsstore@hotmail.com lacrosse.sop@aol.com heetodry@protonmail.com WAXIC996@hotmail.com recklessjiang@zohomail.com torquesong@yahoo.com polar.shirt@yahoo.com chair.yky@gmail.com service.acx@gmail.com customer01@shopify-service.com boss@delightfuts.com customer05@shopify-service.com boss@factiones.com dawn-fast@outlook.com
42	jiyuanm.com esunnily.com	foshanaoke001@163.com info@jiyuanmei.com 2911800416@qq.com jiyuanm.com@contactprivacy.com info@esunnily.com esunnily.com@contactprivacy.com
43	vkrrjewelry.com vlcase.com	2738429873@qq.com service@vkrrjewelry.com pw-e3e30172429068a3e24c72e5edd81db6@privacyguardian.org service@vlcase.com

44	aililady.com	362506843@qq.com contact@Aililady.com contact@AILISISI.com aililady.com@contactprivacy.com
45	genilicaa.com	wenhaotc2022@163.com contact@genilica.com genilicaa.com@contactprivacy.com
46	lifefashionday.com	ppv2020@gmail.com support@lifefashionday.com 96c63f7b84fa4f048187dfb24cc8d1a0.protect@whoisguard.com
47	luxekings.co	tungchefpayment@gmail.com customers.pod.contact@gmail.com
48	spitfice.com	htang8859@gmail.com spitfice@126.com info@spitfice.com
49	thebrandroom.shop	info@outletbrandy.com info@wellones.com
50	Aricot	https://www.amazon.com/shops/ATSPQRNXGR9TE
51	BRUZY& HGVVV&	https://www.amazon.com/shops/A3PGU7TDV3J63F
52	cduybbiuviu	https://www.amazon.com/shops/A2ZL9U65Q9FQDQ
53	fwqvk8888	https://www.amazon.com/shops/A1ACPI1LLUCB7AL
54	GuangZhouLianJianShiYeYouXianGo ngSi	https://www.amazon.com/shops/A1H5AG9KXTCY1L
55	huajiazhiyuexianhuahunqingliyidian	https://www.amazon.com/shops/A3IA7HWLGFZGDP
56	taiyuanxiguaniaoyukejiyouxiangongsi	https://www.amazon.com/shops/A1RDPGKKD67KVI
57	Yihao gift	https://www.amazon.com/shops/AFOVI2H8UITLC
58	aeXai6q	https://www.wish.com/merchant/5f7b4a559451b5004a73d0a1
59	Angelicotory	https://www.wish.com/merchant/5ff853db9cc1e5fab84861c
60	BelleElai	https://www.wish.com/merchant/5e948adc29e78658c089f41c
61	Bluetronicsti	https://www.wish.com/merchant/5fff48cd80aa192fa64fdbc5
62	Brandi B. Makeup Artistry	https://www.wish.com/merchant/600a4bd34a632a288b942e78
63	DiVOT	https://www.wish.com/merchant/600bb94dd3669850d1b3d46c
64	DominicPh	https://www.wish.com/merchant/5e9507067446d700443085d4
65	fanghuijuan2312	https://www.wish.com/merchant/6072748820a354930f72aa1a
66	farzonba	https://www.wish.com/merchant/5f7c95a5846909a6643f6305
67	Formirt	https://www.wish.com/merchant/5fc61313b6a39e72874b00f6
68	Fragata Stores	https://www.wish.com/merchant/5fd963d0c8beb30585644fa7
69	Freelance Wardrobe Stylist	https://www.wish.com/merchant/600a50d97635f12b51062635
70	From Mercury	https://www.wish.com/merchant/5e6ee2631e1985f88d2356f2
71	fus2174shop	https://www.wish.com/merchant/5f7eb33d5f080e2dfc1969f1
72	gyasjbuaifg	https://www.wish.com/merchant/605afb0287476815cce6c874
73	h3t0jx	https://www.wish.com/merchant/5e7829b029e78673fc55bc91
74	HaroldMon	https://www.wish.com/merchant/5e9511b67d58eb1a8c12ceef
75	HobartKer	https://www.wish.com/merchant/5e947a706dc979a728160d83
76	hourace	https://www.wish.com/merchant/5ffa7fea84f2123c7267f449

77	ChristopherBert	https://www.wish.com/merchant/5e9501b3c2efdd0b97ad2b2c
78	Hundp	https://www.wish.com/merchant/6003a3c7d3d832e6160a4e58
79	James G Hope	https://www.wish.com/merchant/5e9d4d2df5b57cd81114e36e
80	Janice R Jackson	https://www.wish.com/merchant/5e9525c8cb74c917c241a375
81	Jimmie M Skinner	https://www.wish.com/merchant/5e95297a7eb5cf15342e99a9
82	JldeEas	https://www.wish.com/merchant/5ff5ba0fe3cb5fc91ad49c81
83	Jolyom	https://www.wish.com/merchant/5fd76ab360df091803cdb4cd
84	JoNatividad	https://www.wish.com/merchant/5e9512d7cb74c9196541539a
85	Ju5k45	https://www.wish.com/merchant/6034a31329ee425b4e6d468b
86	Kate.Se	https://www.wish.com/merchant/5fcfa4ce0178d2fdf240cbfc
87	KevinAlvab	https://www.wish.com/merchant/5e93bba6d10744003e451ab0
88	LIHANSHANGMAOSS	https://www.wish.com/merchant/604481574905050045ca04ee
89	liuzhigang7230	https://www.wish.com/merchant/6079395ea2774d0b86a08479
90	loiSaif5	https://www.wish.com/merchant/5f7c9704e314d8babc01b7de 329483790@qq.com WhatsApp: +86 15294557196
91	Mefranjel	https://www.wish.com/merchant/5e27406dea31082344d08654
92	missluxury	https://www.wish.com/merchant/5fd954f95f02791e485b974d
93	nds jagvdilsfjkdxbhfgxngtngf	https://www.wish.com/merchant/606d702c9117791683babd51
94	nice555	https://www.wish.com/merchant/606c625f8caf72594246b895
95	oaKielte	https://www.wish.com/merchant/5f76144247fa979de3c44be1
96	Peggy McMullene	https://www.wish.com/merchant/5e69e9875098721140ad8d4d
97	Popular color coordinates	https://www.wish.com/merchant/608526f6933947bb846b7b36
98	sa6zi8E	https://www.wish.com/merchant/5f7b69f6a088530fa13f6d38
99	Semca Tienda Online	https://www.wish.com/merchant/5fd6ceda60df097118cdab9f
100	Sherri M Rangel	https://www.wish.com/merchant/5e95283fc01f951fc583730b
101	Spideradioxy	https://www.wish.com/merchant/5fff18091c90df0244b8ef57
102	stesoft	https://www.wish.com/merchant/5fdab7fcaae4ca1859d4ee4f
103	Sunyanli66085	https://www.wish.com/merchant/5e8ee04829e786429aa1608e
104	Tasselti	https://www.wish.com/merchant/600114a11dc2b02e3748298a
105	tinkeauo	https://www.wish.com/merchant/605af6448257b387f16f4644
106	Toy Flower	https://www.wish.com/merchant/606acd48e08c77f8b5ae2520
107	Unipay	https://www.wish.com/merchant/601b78a3da6fa841d91e6658
108	vcba	https://www.wish.com/merchant/5e9fb88251f61241c361a64d
109	wanghai9181	https://www.wish.com/merchant/607a60c8a659d52e055a3f61
110	wangting2650	https://www.wish.com/merchant/60711a363d5ed63800fc6da9
111	watsubo	https://www.wish.com/merchant/5f75b5734fba00ffba66f5c8
112	yufengx	https://www.wish.com/merchant/60069b65d3d83295bb0a4ceb
113	AKA-shi	https://www.wish.com/merchant/5f85da05c0b491fbbf5fbc5a
114	AngelaZebulonx aka amy0515	https://www.wish.com/merchant/5ea76c023f2e0c37f197452c WhatsApp: +8617394977655
115	Annestephanie	https://www.wish.com/merchant/607efe628b131abe8003abce
116	apowejiufa	https://www.wish.com/merchant/5eb63138e4a2bd3bce74309a
117	bambunatural	https://www.wish.com/merchant/60857c037530ac710050eda9

118	Beautiful metamorphosis	https://www.wish.com/merchant/607f85f091605c0f987f094a
119	Beebaer Shoes	https://www.wish.com/merchant/5e743c907f526905dcd93b6f
120	BetsyBridgetzPcPpV	https://www.wish.com/merchant/5e93f32a7fbade2e52bd95bf
121	Blue Princess	https://www.wish.com/merchant/5fd72293e69fe8af463a5d6b
122	caiyohj5Sha	https://www.wish.com/merchant/607e00a145810298527adb9d
123	Cantsed	https://www.wish.com/merchant/607e0957458102a0327adb8e
124	Cbarmen	https://www.wish.com/merchant/6031e0ccb284a697d76efa29
125	cbvbyg	https://www.wish.com/merchant/5e9fbe7713546c264adb0488
126	CGuttma	https://www.wish.com/merchant/60856365a0ca850366063c83
127	Chenyijia Store	https://www.wish.com/merchant/5de1f77929e7864da6dd6ba2
128	chgfte	https://www.wish.com/merchant/5f324d49b5fa4b00412930f4
129	cjeihf	https://www.wish.com/merchant/5f39f28aa33e56027285fbf9
130	Claudia Tour	https://www.wish.com/merchant/6095662da2b1678e401e9b2b
131	Colorine	https://www.wish.com/merchant/6080f12bc3796206c044ff2e
132	Complete Tech	https://www.wish.com/merchant/606b3b9c53adab0486eb094a
133	David D Kettler	https://www.wish.com/merchant/5e9fda56e2fac32f15704173
134	dazhanhongtu123	https://www.wish.com/merchant/5dbf9508ff4ee603d3061c1a
135	Drunk Labrador	https://www.wish.com/merchant/60856e743752b4464361dde6
136	etplaza	https://www.wish.com/merchant/601bc3cf79562f3f9152a54c
137	FarEast STAR	https://www.wish.com/merchant/60957e5261f14a9ec0f5b951
138	Felicitas A Coleman	https://www.wish.com/merchant/5e9fdb98c96219003f445bdf
139	fhuitjo	https://www.wish.com/merchant/5e731b54f56f7903403cflfa
140	fjdwioagerhftgjhthtrgfdxhtrf	https://www.wish.com/merchant/6072932e8fb84e0b2766b320
141	fushuaikang3889	https://www.wish.com/merchant/60727afd67b2fc9763a7e980
142	getgreenfast	https://www.wish.com/merchant/608b87a3b9dd22328327c78a
143	goutoug2865	https://www.wish.com/merchant/607ea4f920c98708c27c8cce
144	guillermoglover	https://www.wish.com/merchant/5fc9a7df7f7f131deb10b4ef
145	Heckoshoo79mW3	https://www.wish.com/merchant/5e84334eff14ef62cd30727b
146	hiovjhadkzfjhfngjghjgyhjk	https://www.wish.com/merchant/607275c6c534cd88d9242791
147	HiramAnnrAnTfM	https://www.wish.com/merchant/5e9806bc29e7866bffe789be
148	huchao1256	https://www.wish.com/merchant/60716ac3ac47c8138240e303
149	HugoPhoebesH	https://www.wish.com/merchant/5e9480fd1a25abaec1b7684f
150	huirushangmaoss	https://www.wish.com/merchant/5feeb1027d97042dc50ac898
151	huzhoudamaige	https://www.wish.com/merchant/5ad2e12eaac71f2e7d942afe
152	IvyPetenZn	https://www.wish.com/merchant/5e9555b565a17901acfc95ca
153	ksoenfuyu	https://www.wish.com/merchant/5ea28fa69dffbe5e2702b872
154	LatonyaToler	https://www.wish.com/merchant/5e78c35f2d03ddb3e4a06e87
155	ldlrcyxnm	https://www.wish.com/merchant/5fc2fc8802c9b3cea5090cff
156	Lgsasasuasbs	https://www.wish.com/merchant/6072e0b0fb49a1ed82e32174
157	liptim	https://www.wish.com/merchant/5ff48fa956c946d3cb01b246
158	llmortgage	https://www.wish.com/merchant/608b8bb01277afc25cd35cea
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265	fashionbags and jackets aka unin188	https://www.dhgate.com/store/21549949
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