# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

#### **CASE NO. 21-CV-61332-RAR**

CHANEL, INC.,

Plaintiff,

v.

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

Defendants.	
	,

## SEALED ORDER GRANTING PLAINTIFF'S EX PARTE APPLICATION FOR ENTRY OF TEMPORARY RESTRAINING ORDER AND SETTING A HEARING ON MOTION FOR PRELIMINARY INJUNCTION

THIS CAUSE comes before the Court on Plaintiff Chanel, Inc.'s *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets [ECF No. 6] ("Application for Temporary Restraining Order") against various Defendants under 15 U.S.C. § 1116, Federal Rule of Civil Procedure 65, and 28 U.S.C. § 1651(a), for alleged violations of the Lanham Act, 15 U.S.C. §§ 1114, 1125(a), and 1125(d). As explained below, Plaintiff has satisfied the requirements for the issuance of a temporary restraining order.

# **BACKGROUND**<sup>1</sup>

Plaintiff Chanel, Inc. is the owner of the following trademarks, which are valid and registered on the Principal Register of the United States Patent and Trademark Office ("Chanel Marks"):

<sup>&</sup>lt;sup>1</sup> The factual background is taken from Plaintiff's Complaint [ECF No. 1], Plaintiff's Application for Temporary Restraining Order [ECF No. 6], and supporting evidentiary submissions. Plaintiff has also filed declarations and exhibits in support of its Application for Temporary Restraining Order [ECF Nos. 6-1 through 6-17].

Trademark	Registration Number	Registration Date	Classes/Goods
CHANEL	0,626,035	May 1, 1956	IC 018 - Women's Handbags
CHANEL	0,902,190	November 10, 1970	IC 014 - Bracelets, Pins, and Earrings
CHANEL	1,177,400	November 10, 1981	IC 025 - Hats, Shawls and Belts
<b>30</b>	1,241,264	June 7, 1983	IC 025 - Suits, Jackets, Skirts, Dresses, Pants, Blouses, Tunics, Sweaters, Cardigans, Tee-Shirts, Coats, Raincoats, Scarves, Shoes and Boots
CHANEL	1,241,265	June 7, 1983	IC 025 - Suits, Jackets, Skirts, Dresses, Pants, Blouses, Tunics, Sweaters, Cardigans, Coats, Raincoats, Scarves, Shoes and Boots
3	1,314,511	January 15, 1985	IC 018 - Leather Goods-Namely, Handbags
CHANEL	1,347,677	July 9, 1985	IC 018 - Leather Goods-Namely, Handbags
	1,501,898	August 30, 1988	IC 006 - Keychains IC 014 - Costume Jewelry IC 025 - Blouses, Shoes, Belts, Scarves, Jackets, Men's Ties IC 026 - Brooches and Buttons for Clothing
CHANEL	1,733,051	November 17, 1992	IC 018 - Leather Goods; namely, Handbags, Wallets, Travel Bags, Luggage, Business and Credit Card Cases, Change Purses, Tote Bags, Cosmetic Bags Sold Empty, and Garment Bags for Travel
30	1,734,822	November 24, 1992	IC 018 - Leather Goods; namely, Handbags, Wallets, Travel Bags, Luggage, Business Card Cases, Change Purses, Tote Bags, and Cosmetic Bags Sold Empty
J12	2,559,772	April 9, 2002	IC 014 - Timepieces; namely, Watches, and Parts Thereof
RUE CAMBON	2,964,843	July 5, 2005	IC 018 - Handbags

Œ	3,025,936	December 13, 2005	IC 009 - Eyeglass Frames, Sunglasses IC 025 - Gloves, Swimwear IC 026 - Hair Accessories, namely, Barrettes
CHANEL	3,133,139	August 22, 2006	IC 014 - Jewelry and Watches
CHANEL	3,134,695	August 29, 2006	IC 009 - Eyeglass Frames, Sunglasses, Sunglass Parts, Cases For Spectacles and Sunglasses IC 025 - Swimwear, Stockings IC 026 - Hair Accessories, Namely, Barrettes IC 028 - Bags Specially Adopted For Sports Equipment, Tennis Rackets, Tennis Balls, Tennis Racket Covers
CHANEL	3,890,159	December 14, 2010	IC 009 - Cases for Telephones IC 018 - Key Cases
Œ	4,074,269	December 20, 2011	IC 009 - Protective Covers for Portable Electronic Devices, Handheld Digital Devices, Personal Computers and Cell Phones IC 018 - Key Cases
Œ	4,241,822	November 13, 2012	IC 025 - For Clothing, namely, Coats, Jackets, Dresses, Tops, Blouses, Sweaters, Cardigans, Skirts, Vests, Pants, Jeans, Belts, Swim Wear, Pareos, Hats, Scarves, Ties, Gloves, Footwear, Hosiery
CHANEL	5,100,448	December 13, 2016	IC 020 - Pillows
CHANEL	5,166,441	March 21, 2017	IC 024 - Travelling blankets
Œ	5,280,486	September 5, 2017	IC 020 - Pillows

See Declaration of Javier Diaz [ECF No. 6-1] ¶¶ 4-5. The Chanel Marks are used in connection with the manufacture and distribution of high quality goods in the categories identified above. See id. at ¶¶ 4-5.

Defendants, by operating Internet based e-commerce stores or interactive photo albums via

Internet marketplace platforms and/or social media or image hosting websites under their seller

identification names and/or commercial Internet websites under their domain names identified on Schedule "A"<sup>2</sup> ("Seller IDs and Subject Domain Names"), have advertised, promoted, offered for sale, or sold goods bearing and/or using what Plaintiff has determined to be counterfeits, infringements, reproductions, or colorable imitations of the Chanel Marks. *See* Diaz Decl. ¶¶ 9-14; Declaration of Stephen M. Gaffigan [ECF No. 6-2] ¶¶ 2-3; Declaration of Eric Rosaler [ECF No. 6-4] ¶¶ 4-5; Rosaler Decl. Comp. Ex. 1 [ECF Nos. 6-5 through 6-14]; Declaration of Kathleen Burns [ECF No. 6-15] ¶¶ 4-5; Burns Decl. Comp. Ex. 1 [ECF Nos. 6-16 through 6-17].

Although each Defendant may not copy and infringe each Chanel Mark for each category of goods protected, Plaintiff has submitted sufficient evidence showing that each Defendant has infringed, at least, one or more of the Chanel Marks. *See* Diaz Decl. ¶¶ 11-14; Rosaler Decl. Comp. Ex. 1; Burns Decl. Comp. Ex. 1. Defendants are not now, nor have they ever been, authorized or licensed to use, reproduce, or make counterfeits, reproductions, or colorable imitations of the Chanel Marks. *See* Diaz Decl. ¶¶ 9, 13-14.

Plaintiff's counsel retained AED Investigations, Inc. ("AED"), and Invisible Inc ("Invisible"), both licensed private investigative firms (collectively the "Investigative Firms"), to investigate the promotion and sale of counterfeit and infringing versions of Plaintiff's branded products by Defendants and to determine the available payment account data for receipt of funds paid to Defendants for the sale of counterfeit versions of Plaintiff's branded merchandise through the Seller IDs and Subject Domain Names. *See* Diaz Decl. ¶ 10; Gaffigan Decl. ¶ 2; Rosaler Decl. ¶ 3; Burns Decl. ¶ 3. The Investigative Firms accessed all the e-commerce stores, photo albums, and websites operating under Defendants' Seller IDs<sup>3</sup> and Subject Domain Names, placed orders

<sup>2</sup> For ease of reference, to identify individual Defendants, the Court uses the assigned Defendant Numbers appearing in the left most column of the table contained in Schedule "A."

<sup>&</sup>lt;sup>3</sup> Defendants 1-23 and 25 operating their Seller IDs through the non-party social media or image hosting websites, Instagram.com, Yupoo.com, and Szwengo.com, use their Seller IDs in tandem with electronic

from each Defendant for the purchase of various products, all bearing and/or using counterfeits of, at least, one of the Chanel Marks<sup>4</sup> at issue in this action, and requested each product be shipped to the Southern District of Florida. *See* Rosaler Decl. ¶ 4 and Comp. Ex. 1 thereto; Burns Decl. ¶ 4 and Comp. Ex. 1 thereto.

Each order was processed entirely online and following submission of the orders, the Investigative Firms received information for finalizing payment<sup>5</sup> for the products ordered via Defendants' respective payment accounts<sup>6</sup> and/or payee,<sup>7</sup> which are identified on Schedule "A"

communication via private messaging applications and/or services such as WhatsApp, Wechat, and Instagram.com in order to complete their offer and sale of counterfeit and infringing versions of Plaintiff's branded products. *See* Rosaler Decl. ¶ 4, n.1.

Certain Defendants use multiple e-commerce stores, photo albums, and/or commercial websites in concert to facilitate their counterfeiting activities and/or to ultimately complete their offer and sale of Plaintiff's branded products. *See* Rosaler Decl. ¶ 4-5, nn.5, 7; Burns Decl. ¶ 4, n.1.

Defendants 90, 275, 303, and 310, who operate via Wish.com or DHgate.com, also use money transfer and retention services with PayPal as an additional payment method to receive monies generated through the sale of counterfeit products. *See* Gaffigan Decl. ¶ 8; Rosaler Decl. at n.4.

Invisible obtained multiple PayPal accounts for some of the Defendants, and following the submission of certain orders from Defendants, Invisible received the identical PayPal payee information for finalizing payment. *See* Burns Decl. at nn.4-5.

<sup>&</sup>lt;sup>4</sup> Several Defendants blurred-out and/or physically altered images of the Chanel Marks on the products being offered for sale via their respective Seller IDs. *See* Rosaler Decl. ¶ 4, n.2; Burns Decl. ¶ 4, n.2. Upon receipt of the products purchased from certain Defendants, the Investigative Firms visually inspected the products and verified each product bore one or more of the Chanel Marks in their entirety. *See id.* The remaining Defendants either provided URL addresses directly on their respective infringing product webpages where images of the full products bearing the Chanel Marks are located, or provided via e-mail and/or direct messaging, additional images of the products bearing one or more of the Chanel Marks in their entirety. *See* Rosaler Decl. at n.2.

<sup>&</sup>lt;sup>5</sup> The Investigative Firms were instructed not to transmit the funds to finalize the sale for the orders from most of the Defendants so as to avoid adding money to Defendants' coffers. *See* Gaffigan Decl. ¶ 2, n.2; Rosaler Decl. ¶ 4, n.3; Burns Decl. ¶ 4, n.3.

<sup>&</sup>lt;sup>6</sup> Defendants 1-23 and 25 operate via the non-party social media and/or image hosting websites, Instagram.com, Yupoo.com, and Szwego.com, and Defendants 26-49 operate via commercial websites; these Defendants use money transfer and retention services with PayPal as a method to receive monies generated through the sale of counterfeit products. *See* Gaffigan Decl. ¶ 8, n.6; Rosaler Decl. ¶ 4, n.4; Burns Decl. ¶ 4, n.4.

<sup>&</sup>lt;sup>7</sup> Defendant 24 operates via the non-party Internet marketplace platform, AliExpress.com, and has its payments processed on its behalf using Alipay. Defendants 22-24 have their payments processed on their

hereto.<sup>8</sup> See Rosaler Decl. ¶ 4; Burns Decl. ¶ 4. At the conclusion of the process, the detailed web page captures and images of Plaintiff's branded products offered for sale and ordered via Defendants' Seller IDs and Subject Domain Names, together with photographs of products received, were sent to Plaintiff's representative for inspection. See Rosaler Decl. ¶¶ 4-5, n.2; Burns Decl. ¶¶ 4-5, n.2; Gaffigan Decl. ¶ 2, n.1; Diaz Decl. ¶¶ 11-13, n.1. Plaintiff's representative reviewed and visually inspected the detailed web page captures and photographs reflecting Plaintiff's branded products identified and captured by the Investigative Firms and determined the products were non-genuine, unauthorized versions of Plaintiff's products. See Diaz Decl. ¶¶ 12-14.

### **LEGAL STANDARD**

To obtain a temporary restraining order, a party must demonstrate "(1) a substantial likelihood 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-

behalf using PayPal, identifying the payee "Alipay Singapore E-Commerce Private Limited," which is the aggregate PayPal account for purchases made via PayPal on AliExpress.com. *See* Rosaler Decl. ¶ 4, n.5; Gaffigan Decl. ¶ 9.

Defendants 50-57 operate via the non-party e-commerce marketplace platform, Amazon.com. Amazon.com is an e-commerce marketplace that allows Defendants to conduct their commercial transactions privately via Amazon's payment processing and retention service, Amazon Payments, Inc. *See* Burns Decl. ¶ 4, n.6; Gaffigan Decl. ¶ 10.

Defendants 58-247 operate via the non-party marketplace platform, Wish.com, which is operated by ContextLogic. The payee for the orders placed on Wish.com identifies "PAYPAL \*Wish," which is the aggregate PayPal account for purchases made via Wish.com. *See* Gaffigan Decl. ¶ 11; Rosaler Decl. ¶ 4, n.5.

Defendants 248-349 operate via the non-party marketplace platform, DHgate.com, and have their payments processed on their behalf via DHgate.com's third-party payment platform, DHpay.com. The DHgate.com and DHpay.com platforms are operated by the Dunhuang Group, who utilizes Camel FinTech Inc to process transactions on behalf of DHgate.com to its customers. *See* Gaffigan Decl. ¶ 12; Rosaler Decl. at n.5.

<sup>&</sup>lt;sup>8</sup> The e-mail addresses and other means of electronic contact provided by Defendants in connection with their respective Seller IDs and Subject Domain Names, including any e-mail addresses used to communicate with Plaintiff's investigators, are included in Schedule "A" annexed hereto. *See* Gaffigan Decl. ¶ 3, n.5; Rosaler Decl. ¶ 4, n.6; Burns Decl. ¶ 4, n.7.

movant; and (4) that the entry of the relief would serve the public interest." *Schiavo ex. rel Schindler v. Schiavo*, 403 F.3d 1223, 1225–26 (11th Cir. 2005); *see also Levi Strauss & Co. v. Sunrise Int'l. Trading Inc.*, 51 F.3d 982, 985 (11th Cir. 1995) (applying the test to a preliminary injunction in a Lanham Act case). Additionally, a court may only issue a temporary restraining order without notice to the adverse party or its attorney if:

(A) specific facts in an affidavit or a verified complaint clearly show that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition [and] (B) the movant's attorney certifies in writing any efforts made to give notice and the reasons why it should not be required.

Fed. R. Civ. P. 65(b)(1). Ex parte temporary restraining orders "should be restricted to serving their underlying purpose of preserving the status quo and preventing irreparable harm just so long as is necessary to hold a hearing, and no longer." Granny Goose Foods, Inc. v. Bhd. of Teamsters & Auto Truck Drivers Local No. 70 of Alameda Cty., 415 U.S. 423, 439 (1974).

#### **ANALYSIS**

The declarations Plaintiff submitted in support of its Application for Temporary Restraining Order support the following conclusions of law:

- A. Plaintiff has a strong probability of proving at trial that consumers are likely to be confused by Defendants' advertisement, promotion, sale, offer for sale, and/or distribution of goods bearing and/or using counterfeits, reproductions, or colorable imitations of the Chanel Marks, and that the products Defendants are selling and promoting for sale are copies of Plaintiff's products that bear copies of the Chanel Marks.
- B. Because of the infringement of the Chanel Marks, Plaintiff is likely to suffer immediate and irreparable injury if a temporary restraining order is not granted. It appears from the following specific facts, as set forth in Plaintiff's Complaint, Application for Temporary Restraining Order, and accompanying declarations on file, that immediate and irreparable loss,

damage, and injury will result to Plaintiff and to consumers before Defendants can be heard in opposition unless Plaintiff's request for *ex parte* relief is granted:

- 1. Defendants own or control e-commerce stores, interactive photo albums, and commercial Internet websites operating under their Seller IDs and Subject Domain Names which advertise, promote, offer for sale, and sell products bearing and/or using counterfeit and infringing trademarks in violation of Plaintiff's rights;
- 2. There is good cause to believe that more counterfeit and infringing products bearing and/or using Plaintiff's trademarks will appear in the marketplace; that consumers are likely to be misled, confused, and/or disappointed by the quality of these products; and that Plaintiff may suffer loss of sales for its genuine products; and
- 3. There is good cause to believe that if Plaintiff proceeds on notice to Defendants of this Application for Temporary Restraining Order, Defendants can easily and quickly change the ownership or modify domain registration, e-commerce store, photo album, and private messaging account data and content, change payment accounts, redirect consumer traffic to other seller identification names, private messaging accounts, and domain names, and transfer assets and ownership of the Seller IDs and Subject Domain Names, thereby thwarting Plaintiff's ability to obtain meaningful relief.
- C. The balance of potential harm to Defendants in restraining their trade in counterfeit and infringing branded goods if a temporary restraining order 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.
- D. The public interest favors issuance of the temporary restraining order to protect Plaintiff's trademark interests and protect the public from being defrauded by the palming off of counterfeit goods as Plaintiff's genuine goods.

- E. Under 15 U.S.C. § 1117(a), Plaintiff may be entitled to recover, as an equitable remedy, the illegal profits gained through Defendants' distribution and sales of goods bearing and/or using counterfeits and infringements of the Chanel Marks. *See Reebok Int'l, Ltd. v. Marnatech Enters., Inc.*, 970 F.2d 552, 559 (9th Cir. 1992) (quoting *Fuller Brush Products Co. v. Fuller Brush Co.*, 299 F.2d 772, 777 (7th Cir. 1962) ("An accounting of profits under § 1117(a) is not synonymous with an award of monetary damages: '[a]n accounting for profits . . . is an equitable remedy subject to the principles of equity."")).
- F. Requesting equitable relief "invokes the district court's inherent equitable powers to order preliminary relief, including an asset freeze, in order to assure the availability of permanent relief." *Levi Strauss & Co.*, 51 F.3d at 987 (citing *FTC v. United States Oil and Gas Corp.*, 748 F.2d 1431, 1433-34 (11th Cir. 1984)).
- G. In light of the inherently deceptive nature of the counterfeiting business, and the likelihood that Defendants have violated federal trademark laws, Plaintiff has good reason to believe Defendants will hide or transfer their ill-gotten assets beyond the jurisdiction of this Court unless those assets are restrained.

#### **CONCLUSION**

For the foregoing reasons, it is hereby

**ORDERED AND ADJUDGED** that Plaintiff's Application for Temporary Restraining Order [ECF No. 6] is **GRANTED**. A temporary restraining order is entered 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 hereby temporarily restrained:
  - a. From manufacturing, importing, advertising, promoting, offering to sell, selling, distributing, or transferring any products bearing and/or using the

- Chanel 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 the Chanel Marks, or any confusingly similar trademarks; (ii) any evidence relating to the manufacture, importation, sale, offer for sale, distribution, or transfer of any products bearing and/or using the Chanel Marks, or any confusingly similar trademarks; or (iii) any assets or other financial accounts subject to this Order, including inventory assets, in the actual or constructive possession of, or owned, controlled, or held by, or subject to access by, any Defendant, including, but not limited to, any assets held by or on behalf of any Defendant.
- (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 the use of the Chanel Marks or any confusingly similar trademarks, on or in connection with all Internet based e-commerce stores, interactive photo albums, and Internet websites owned and operated, or controlled by them, including the Internet based e-commerce stores, interactive photo albums, and Internet websites operating under the Seller IDs and 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 this Order shall immediately discontinue the use of the Chanel 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 any web page), from any advertising links to

other websites, from search engines' databases or cache memory, and any other form of use of such terms that are visible to a computer user or serves to direct computer searches to Internet based e-commerce stores, interactive photo albums, and Internet websites registered, owned, or operated by each Defendant, including the Internet based e-commerce stores, interactive photo albums, and Internet websites operating under the Seller IDs and Subject Domain Names.

- (4) Each Defendant shall not transfer ownership of the Internet based e-commerce stores, interactive photo albums, and Internet websites operating under their Seller IDs and Subject Domain Names during the pendency of this action, or until further order of the Court.
- (5) Each Defendant shall preserve copies of all computer files relating to the use of any of the Internet based e-commerce stores, interactive photo albums, and Internet websites operating under their Seller IDs and Subject Domain Names and shall take all steps necessary to retrieve computer files relating to the use of the Internet based e-commerce stores, interactive photo albums, and Internet websites operating under their Seller IDs and Subject Domain Names that may have been deleted before the entry of this Order.
- (6) Upon Plaintiff's request, the privacy protection service for the Subject Domain Names for which the registrant uses such privacy protection service to conceal the registrant's identity and contact information is ordered to disclose to Plaintiff the true identities and contact information for that registrant.
- (7) The domain name registrars for the Subject Domain Names shall immediately assist in changing the registrar of record for the Subject Domain Names to a holding account with a registrar of Plaintiff's choosing (the "New Registrar"), 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 business day 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 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. 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 Locator ("URL") http://servingnotice.com/cp05e/index.html, whereon copies of the Complaint, this Order, and all other documents on file in this action shall be displayed. Alternatively, the New Registrar may update the Domain Name System ("DNS") data it maintains for the Subject 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 shall be 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) Upon Plaintiff's request, any Internet marketplace website operators and/or administrators who are provided with notice of this Order, including but not limited to Amazon.com, Inc., shall immediately cease fulfillment of and sequester Defendants' inventory assets corresponding to the ASINs identified on Schedule "A" hereto presently in its inventory,

possession, custody, or control, and impound such goods in trust for the Court during the pendency of this action.

- (9)Upon receipt of notice of this Order, Defendants and all financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to, PayPal, Inc. ("PayPal"), Alibaba.com Hong Kong Limited, which operates the AliExpress.com platform ("AliExpress"), Zhejiang Ant Small and Micro Financial Services Group Co., Ltd. ("Ant Financial Services"), AliPay (China) Internet Technology Co. Ltd., Alipay.com Co., Ltd., and Alipay Singapore E-Commerce Private Limited (collectively, "Alipay"), Amazon Payments, Inc. ("Amazon"), ContextLogic, Inc., which operates the Wish.com website ("ContextLogic"), Dunhuang Group which operates the DHgate.com and DHPay.com platforms, Camel FinTech Inc, and their related companies and affiliates shall (i) immediately identify all financial accounts and/or sub-accounts, associated with the Internet based e-commerce stores, photo albums, and Internet websites operating under the Seller IDs and Subject Domain Names, the PayPal payees, store numbers, merchant identification numbers, infringing product numbers, and/or the e-mail addresses identified on Schedule "A" hereto, as well as any other accounts of the same customer(s); (ii) identify all other accounts which transfer funds into the same financial institution account(s) or any of the other financial accounts subject to this Order; (iii) restrain the transfer of all funds, as opposed to ongoing account activity, held or received for their benefit or to be transferred into their respective financial accounts, and any other financial accounts tied thereto; and (iv) immediately divert those restrained funds to a holding account for the trust of the Court.
- (10) Upon receipt of notice of this Order, Defendants and all financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to, PayPal, AliExpress, Ant Financial Services, Alipay, Amazon,

ContextLogic, Dunhuang Group which operates the DHgate.com and DHPay.com platforms, Camel FinTech Inc, and their related companies and affiliates, shall further, within five business days of receiving notice of this Order, provide Plaintiff's counsel with all data that details (i) an accounting of the total funds restrained and identify the financial account(s) and sub-account(s) which the restrained funds are related to, and (ii) the account transactions related to all funds transmitted into the financial account(s) and sub-account(s) which have been restrained. Such restraining of the funds and the disclosure of the related financial institution account information shall be made without notice to the account owners or the financial institutions until after those accounts are restrained. No funds restrained by this Order shall be transferred or surrendered by any financial institution, payment processor, bank, escrow service, money transmitter, or marketplace website, including but not limited to, PayPal, AliExpress, Ant Financial Services, Alipay, Amazon, ContextLogic, Dunhuang Group which operates the DHgate.com and DHPay.com platforms, Camel FinTech Inc, and their related companies and affiliates for any purpose (other than pursuant to a chargeback made pursuant to their security interest in the funds) without the express authorization of this Court.

- (11) Any Defendant or financial institution account holder subject to this Order may petition the Court to modify the asset restraint set out in this Order.
- (12) This Order shall apply to the Seller IDs and Subject Domain Names, associated e-commerce stores, photo albums, and websites, and any other seller identification names, e-commerce stores, photo albums, private messaging accounts, domain names and websites, or financial accounts which are being used by Defendants for the purpose of counterfeiting the Chanel Marks at issue in this action and/or unfairly competing with Plaintiff.

- (13) As a matter of law, this Order shall no longer apply to any Defendant or associated e-commerce store, photo album, or domain name dismissed from this action or as to which Plaintiff has withdrawn its request for a temporary restraining order.
- (14) This Order shall remain in effect until the date for the hearing on the Motion for Preliminary Injunction set forth below, or until such further dates as set by the Court or stipulated to by the parties.
- (15) Under 15 U.S.C. § 1116(d)(5)(D) and Federal Rule of Civil Procedure 65(c), Plaintiff shall post a bond in the amount of \$10,000.00 by **July 13, 2021**, 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. In the Court's discretion, the bond may be subject to increase should an application be made in the interest of justice.
- which time Defendants and/or any other affected persons may challenge the appropriateness of this Order and move to dissolve the same and at which time the Court will hear argument on Plaintiff's requested preliminary injunction. The parties are instructed to call 1-877-402-9753 by no later than 9:25 A.M. on July 13, 2021. The access code is 9372453 and the password is 0918. The Court requires that the Parties appear via a landline (i.e. not a cellular phone or a speaker phone), if possible, for clarity.
- (17) After Plaintiff's counsel has received confirmation from the financial institutions regarding the funds restrained as directed herein, Plaintiff shall serve a copy of the Complaint, the Application for Temporary Restraining Order, and this Order, on each Defendant via their corresponding e-mail/online contact form or other means of electronic contact provided on the Internet based e-commerce stores, photo albums, and websites operating under the respective Seller IDs and Subject Domain Names, or by providing a copy of this Order by e-mail to the

marketplace platform, social media website, image hosting website, or the registrar of record for each of the Seller IDs and Subject Domain Names so that the marketplace platform, social media website, image hosting website, and registrar, in turn, notifies each Defendant of the Order, or by other means reasonably calculated to give notice which is permitted by the Court. In addition, Plaintiff shall post copies of the Complaint, Application for Temporary Restraining Order, and this Order, as well as all other documents filed in this action on the website located at <a href="http://servingnotice.com/cp05e/index.html">http://servingnotice.com/cp05e/index.html</a>, and shall provide the address to the Defendants via e-mail/online contact form, and such notice so given shall be deemed good and sufficient service thereof. Plaintiff shall continue to provide notice of these proceedings and copies of the documents on file in this matter to Defendants by regularly updating the website located at <a href="http://servingnotice.com/cp05e/index.html">http://servingnotice.com/cp05e/index.html</a>, or by other means reasonably calculated to give notice which is permitted by the Court.

- (18) Additionally, for the purpose of providing additional notice of this proceeding, and all other pleadings, orders, and documents filed herein, the owners, operators and/or administrators of the Internet marketplace platform, social media and image hosting websites, messaging services, and/or financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to, PayPal, AliExpress, Alipay, Amazon.com, Inc., ContextLogic, Dunhuang Group which operates the DHgate.com and DHPay.com platforms, Camel FinTech Inc, Instagram.com, Yupoo.com, Facebook.com, Szwego.com, and their related companies and affiliates shall, at Plaintiff's request, provide Plaintiff's counsel with any e-mail address known to be associated with Defendants' respective Seller IDs and Subject Domain Names.
- (19) Any response or opposition to Plaintiff's Motion for Preliminary Injunction must be filed and served on Plaintiff's counsel forty-eight (48) hours prior to the hearing. Plaintiff shall

file any Reply Memorandum twenty-four (24) hours prior to the hearing. The above dates may be revised upon stipulation by all parties and approval of this Court. Defendants are hereby on notice that failure to appear at the hearing may result in the imposition of a preliminary injunction against them pursuant to 15 U.S.C. § 1116(d), Fed. R. Civ. P. 65, The All Writs Act, 28 U.S.C. § 1651(a), and this Court's inherent authority.

- (20) The Court will consider Plaintiff's request for a preliminary injunction after notice has been provided to Defendants. *See* Fed. R. Civ. P. 65(a)(1) ("The court may issue a preliminary injunction only on notice to the adverse party.").
- (21) Under Federal Rule of Civil Procedure 65(b)(2), this Temporary Restraining Order expires at <u>9:30 A.M.</u> on <u>July 13, 2021</u>, unless extended for good cause.

**DONE AND ORDERED** in Fort Lauderdale, Florida, this 2nd day of July, 2021.

RODOLFO A. RUIZ II

UNITED STATES DISTRICT JUDGE

# SCHEDULE "A" DEFENDANTS BY NUMBER, SELLER ID, SUBJECT DOMAIN NAME, RESPECTIVE FINANCIAL INFORMATION, AND ADDITIONAL MEANS OF CONTACT

Def.	Defendant / Seller ID /	Financial Account / Store No. / Merchant ID	PayPal Payee	ASIN /	Additional Means of	Social Media URL
No.	Subject Domain Name			Infringing Product No.	Contact <sup>9</sup>	
1	analuxuryfashion	bertonlea@hotmail.com			WhatsApp: +8617603061115	
2	bolsos l.v chanel	anabediva50@outock.pt			DM WhatsApp: +34 642 06 07 16	
	boisos_i.v_chanci	hermesezzhermes@gmail.co			DM	
3	chanel.dio.lv.gucci	m US			Wechat: 6240012	
					DM	
4	chenhuaying8	2335817488@qq.com			WhatsApp: +86 157 7979 1355	
5	cuiyeye2	5175299@qq.com			WhatsApp: +8613178238800	
6	eva.brand.goods	evayu891201@gmail.com			WhatsApp: +0086- 18149704790	
7	furshoes_wholesale	1193752402@qq.com			WhatsApp: +8619142092599	
8	hushbegs	apanhwar3@gmail.com			DM	
	kelly shoes1	287821339@qq.com			DM	
	Kerry_shoes1	287821337@qq.com			DM	
10	lina9869832	986983287@qq.com			WhatsApp: +8617689451819	
10	yisa09889	986983287@qq.com			WhatsApp: +8613615998061	
11	love brand collection	2493486587@qq.com			DM	
	luxury.storeglobal	lareinaguo77@gmail.com			DM	
12	luxui y.storegiooai	iaicinaguo / /(a/ginan.com			DM	
13	luxuryshoesbags86	2583151893@qq.com			WhatsApp: 8617665237415	
14	meizi 2013168 g	1649366167@qq.com			WhatsApp: +8615813635980	
15	merrykick	ericsheng20@outlook.com			WhatsApp: +8618858408171	
		fashionchen1005@outlook.c				
16	moengyunxun	om			WhatsApp: +8618100591850	
16	rifaich an a26041	fashionchen1005@outlook.c			Whata A   9615090100120	
16	yifeichong36241	om			WhatsApp: +8615080190129 DM	
					WhatsApp: +86 136 2148	
17	nancyhenrybbbag2020	13621488409@163.com			8409	
18	worlds brand store76	mrsilent0tear@gmail.com			WhatsApp: +92 305 6748554	
19	yaojiany	cuiyuhui1@126.com			WhatsApp: +8613386924492	
		•			DM	
20	yiyanbags	1814574538@qq.com			WhatsApp: +8613760843667	
21	yofashionvip	1161646254@qq.com			DM	
	1 0 4 0 4 0	Store No. 900250100				
	brenda84819	AE- Alipay@service.alibaba.com			WhatsApp: 008613530531210	
22	aka 3110p300230100 Store	Store No. 911259040			WhatsApp. 008013330331210	
	hankyang0117	AE-				
23	aka Shop911259040 Store	Alipay@service.alibaba.com				
		Store No. 911603835 AE-				
24	2589 Store	Alipay@service.alibaba.com				
25	A-kuei	965553355@qq.com			WhatsApp: +86 159 9975 7613	

<sup>&</sup>lt;sup>9</sup> Defendants' private messaging accounts via WhatsApp and Instagram.com are denoted in this chart as telephone numbers and direct messaging ("DM"), respectively. *See* Rosaler Decl. at n.8.

				WH . A	1
				WhatsApp: +1 2095651228 service@521bags.com	
26	521bags.com	ligezhang0@gmail.com		support@tiktokhotpop.com	
27	areaglam.com	falcosstore10@gmail.com		info@areaglam.com	
28	blessedbedding.com	ntuan8438@gmail.com		support@blessedbedding.com	
29	bolsoslvchanel.com	jhostyndiaz25@gmail.com			
	•			WhatsApp: 60165425482	
	depurses.ru aka purse inspiration	keanyongtan91@gmail.com		WhatsApp: 8618666021721 desacpurse@gmail.com	
30	aka puise_mspiration	Reanyongtan91@gman.com		WhatsApp: +1 561-292-9603	
31	dtcbags.com	pp869788680@jackwzm.cn		service@dtcbags.com	
	are ougsteen	lehuephuong46933@gmail.c		551/100(0)3450435	
32	exrain.com	om		support@exrain.com	
				order@lemaisonparis.com	
33	lemaisonparis.com	jabouzasrendal@icloud.com		WhatsApp: +1 302 4401 725	
2.4	luxurybag.xyz	zhong1995ju0202@gmail.co		WhatsApp: 8618826227375	
34	luxuryoag.xyz	m		WhatsApp: +8618677773661	
35	luxurybagweb.com	paypal@tradinggogo.com		Mell.Billi@gmx.com	
	offstreetunit.com	info@offstreetunit.com			
		~			
37	todadivaofficial.com	sales@todadivaofficial.com		info@todadivaofficial.com	
38	wereplica.com	ulisfyha@gmail.com		wereplica@gmail.com	
20	,			WhatsApp: +1(579) 390-3848	
39	womyshop.com	kristinbazar99@gmail.com	Cil Tu- diu - C-	womyshop21@gmail.com	
40	corwin.store	james745119@gmail.com	Sihe Trading Co., Ltd.	hanli135790@gmail.com	
70	col will.store	James / 43117 (agman.com	Sihe Trading Co.,	hanli135790@gmail.com	
40	bluerd.shop		Ltd.	hello@nova.com	
			Sihe Trading Co.,		
40	buebu.shop		Ltd.	hanli135790@gmail.com	
4.0			Sihe Trading Co.,		
40	feieagle.shop		Ltd. Sihe Trading Co.,	hanli135790@gmail.com	
40	iluivo.shop		Ltd.	YT@gmail.com	
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40	incco.shop	james745119@gmail.com	Ltd.	hanli135790@gmail.com	
			Sihe Trading Co.,		
40	ofore.store		Ltd.	hanli135790@gmail.com	
40	1' 1		Sihe Trading Co.,	1 1:125700 : 1	
40	seerlin.shop		Ltd.	hanli135790@gmail.com service.acx@gmail.com	www.facebook.co
			Sunoutdoor Co.,	customer01@shopify-	m/Raretall-2-
41	raretall.com	hotsstore@hotmail.com	Ltd.	service.com	101674995209115
				service.acx@gmail.com	
				boss@delightfuts.com	www.facebook.co
11	delightfute com		Sunoutdoor Co.,	customer05@shopify-	m/Delightfuts-1- 100279455408951/
41	delightfuts.com		Ltd.	service.com	www.facebook.co
			Sunoutdoor Co.,	service.acx@gmail.com	m/Factiones-1-
41	factiones.com		Ltd.	boss@factiones.com	103313698388160
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41	ignoreds.com		Ltd.	service.acx@gmail.com	www.facebook.co
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41	ongoinges.com		Ltd.	service.acx@gmail.com	103025901791990/
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41	pendingets.com	lacrosse.sop@aol.com	Ltd.	service.acx@gmail.com	m/Pendingetscom-

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		heetodry@protonmail.com	Guili Liu		104578065141218
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			Wangxinchao Electronic		
4.1	1 1: 61	: 00601 / 1	Commerce Co.,	service.acx@gmail.com	
41	beliefal.com	waxic996@hotmail.com	Ltd.	dawn-fast@outlook.com	
			Wuhan		
			Wangxinchao		
			Electronic		
			Commerce Co.,		
41	amountes.com		Ltd.	service.acx@gmail.com	
			Wuhan		
			Wangxinchao		
			Electronic		
			Commerce Co.,	service.acx@gmail.com	
			Ltd.	customer01@shopify-	
41	gloriousion.com	recklessjiang@zohomail.com	Haidong Ye	service.com	
				service.acx@gmail.com	
41	dawnise.com	torquesong@yahoo.com	Zhiwei Chen	dawn-fast@outlook.com	
			Dubaozhan		
			Communication		
41	shineian.com	polar.shirt@yahoo.com	Co., Ltd.	service.acx@gmail.com	
- 1 1	J.I.I.O. GIII	polarismitas junioo.com	Ruimu Women's	Ser rice.ueAwginum.com	
			Shoes Store,		
			Wuchang District,		
41	yeaing.com	chair.yky@gmail.com	Wuhan	service.acx@gmail.com	
41	yeamg.com	chan.yky@gman.com		service.acx@gman.com	
			佛山市顺镪建材		
			有限公司		
			(Foshan Shunli		
	l		Building Material	info@jiyuanmei.com	
42	jiyuanm.com	foshanaoke001@163.com	Co., Ltd.)	2911800416@qq.com	
			佛山市顺镪建材		
			有限公司		
			(Foshan Shunli		
			Building Material		
42	esunnily.com		Co., Ltd.)	info@esunnily.com	
			深圳市豪佳杰贸		
			易有限公司		
			(Shenzhen		
			Haojiajie Trading		
43	vkrjewelry.com	2738429873@gg.com	Co., Ltd.)	service@vkrjewelry.com	
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			深圳市豪佳杰贸		
			易有限公司		
			(Shenzhen		
			Haojiajie Trading		
12	vlcase.com		Co., Ltd.)	service@vlcase.com	
+3	vicase.com			Scrvice(a,vicase.com	
			深圳市天隆资产		
			管理有限公司		
			(Shenzhen		
			Tianlong Asset		
	,,, ,	262506012	Management Co.,	contact@Aililady.com	
44	aililady.com	362506843@qq.com	Ltd.)	contact@AILISISI.com	
			深圳市信速进出		
			口有限公司		
			(Shenzhen Xinsu		
	genilicaa.com	wenhaotc2022@163.com	Import and Export	contact@genilica.com	

			Co., Ltd.)			
46	lifefashionday.com	ppvt2020@gmail.com	Nguyen Nhat Vu		support@lifefashionday.com	
	merasmonaay.com	tungchefpayment@gmail.co	r igay on Timer via		customers.pod.contact@gmail.	
47	luxekings.co	m	Tran Thanh Tung		com	
	. ~		rao ping xian shun		spitfice@126.com	
48	spitfice.com	htang8859@gmail.com	tang jian cai dian		info@spitfice.com	www.facebook.co
						www.facebook.co m/thebrandroomsh
49	thebrandroom.shop	info@outletbrandy.com	Outlet Brandy LTD		info@wellones.com	op/
50	Aricot	ATSPQRNXGR9TE		B094FJ29MB		
51	BRUZY&	A3PGU7TDV3J63F		B092JJTP8Q		
<i></i>	BROZIG	1131 GC / 12 / 30031		B092JGHG6S		
51	HGVVV&	A3PGU7TDV3J63F		B092JJY7CM		
52	cduybbiuviu	A2ZL9U65Q9FQDQ		B092H5FZZ1		
53	fwqvk8888	A1ACP1LLUCB7AL		B094ZSJF91		
	GuangZhouLianJianShiYe			207.250171		
54	YouXianGongSi	A1H5AG9KXTCY1L		B092LZVGR6		
	huajiazhiyuexianhuahunqi	AAA SHINII GEZGDD		DAATI (DALIAG		
55	ngliyidian taiyuanxiguaniaoyukejiyou	A3IA7HWLGFZGDP		B08TMPSH8S		
56	xiangongsi	A1RDPGKKD67KVI		B092LH9KGK		
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57	Yihao gift	AFOVI2H8UITLC		B092LN9ZW1		
50	37.16	5071 4 550 4511 500 4 72 10 1		6062ba8417c067f9202cd		
58	aeXai6q	5f7b4a559451b5004a73d0a1		0a3 606be73d0650efcef6a5ed		
59	Angelicotory	5fff853db9cc1e5fab84861c		23		
				5fc1a513ffd8f70d3bdbe5		
60	BelleElai	5e948adc29e78658c089f41c		c9		
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61	Bluetronicsti	5fff48cd80aa192fa64fdcb5		f6c 60652acec551267f3acb7		
62	Brandi B. Makeup Artistry	600a4bd34a632a288b942e78		6b9		
		600bb94dd3669850d1b3d46		60765492e41f2cb5ee8c4f		
63	DiVOT	С		9b		
64	DominicPh	5e9507067446d700443085d		606ac2aabd1aebc9b35a3 dd7		
04	DominicPn	4		607d515511f74b7a64385		
65	fanghuijuan2312	6072748820a354930f72aa1a		2f5		
				6063d81862880e62241d		
66	farzonba	5f7c95a5846909a6643f6305		7f50		
67	Formirt	5fc61313b6a39e72874b00f6		606fee193d99e23fcc8612		
07	ı ormit	510015150003707207400010		607b38624d445a3d036bf		
68	Fragata Stores	5fd963d0c8beb30585644fa7		e34		
				6063e1b7232515908368		
69	Freelance Wardrobe Stylist	600a50d97635f12b51062635		86fd 6078f5aeb565fe5377807		
70	From Mercury	5e6ee2631e1985f88d2356f2		215		
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71	fus2174shop	5f7eb33d5f080e2dfc1969f1		b95		
70	7	COE (1.000747C017 C.071		6073ee98ff132251acdffc		
72	gyasjbuiafg	605afb0287476815cce6c874		ea 603b425b8496d1eab5a66		
73	h3t0jx	5e7829b029e78673fc55bc91		d13		
	· J			605bfdc1c355c65e12701		
74	HaroldMon	5e9511b67d58eb1a8c12ceef		98c		
7.	II 1 dZ	5 047 7061 070 700160 100		60667b798385c16cb7f55		
/5	HobartKer	5e947a706dc979a728160d83		138		

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76	1	555-759452122-72(75440	60671d7a65cece4c4012f	
76	hourace	5ffa7fea84f2123c7267f449	lea   605992807b870a27ea53d	
77	hristopherBert	5e9501b3c2efdd0b97ad2b2c	0039928070870a27ea33d 0ba	
- / /	inistopherbert	36/301036261dd00/74d2026	608e54eb2825771a7192c	
78	Hundp	6003a3c7d3d832e6160a4e58	600	
	1		606d337c978236e59d995	
79	James G Hope	5e9d4d2df5b57cd81114e36e	568	
	•		606958215fc80a6e42a78	
80	Janice R Jackson	5e9525c8cb74c917c241a375	8ce	
			6067f5adada096d881424	
81	Jimmie M Skinner	5e95297a7eb5cf15342e99a9	e18	
			606eca3a2c9160b33c4a0	
82	JldeEas	5ff5ba0fe3cb5fc91ad49c81	d25	
			60050c275c728b8945d13	
83	Jolyom	5fd76ab360df091803cdb4cd	56c	
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84	JoNatividad	5e9512d7cb74c9196541539a	9da	
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85	ju5k45	6034a31329ee425b4e6d468b	c3	
07	Vata Ca	5fcfa4ce0178d2fdf240cbfc	6013982aac36371ccd867	
86	Kate.Se	Sicia4ce01/8d2idi240cbic	9a3 605414b3aa0ad4d1ccd70	
07	Vi A ll-	5-02116110744002-451-10	9e1	
87	KevinAlvab	5e93bba6d10744003e451ab0	6061a6b6c9ffc9d81c9fe8	
88	LIHANSHANGMAOSS	604481574905050045ca04ee	68	
00	LIHANSHANGMAOSS	004481374903030043040466	6092ca96faf07523f55ad0	
89	liuzhigang7230	6079395ea2774d0b86a08479	44	
0,7	inuzingang/250	Merchant ID:	TT	
		5f7c9704e314d8babc01b7de		
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		IFAVEAL ACCOUNT	IDUDDCX3894UD4d7822dXT1	
90	loiSaif5	PayPal Account:	606bc83a940b4d7a22d8f 422 WhatsApp: +86 15294557196	
90	loiSaif5	PayPai Account: 329483790@qq.com	422 WhatsApp: +86 15294557196	
		329483790@qq.com		
	loiSaif5 Mefranje1		422 WhatsApp: +86 15294557196 5fc0817f5e56e8d90dbe9	
91	Mefranje l	329483790@qq.com	422 WhatsApp: +86 15294557196 5fc0817f5e56e8d90dbe9 152	
91	Mefranje1 missluxury	329483790@qq.com 5e27406dea31082344d08654	422 WhatsApp: +86 15294557196 5fc0817f5e56e8d90dbe9 152 6067ce1bb4d82c6cb90af	
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106	Toy Flower	606acd48e08c77f8b5ae2520	60701ae17dca3d154e554 b41
			607fa04ae16d7b3c18fda0
107	Unipay	601b78a3da6fa841d91e6658	5f 60506c1bf7f91cd5af2830
108	vcba	5e9fb88251f61241c361a64d	c1
109	wanghai9181	607a60c8a659d52e055a3f61	6092ce06af84cd2c19d2a a4a
110	wangting2650	60711a363d5ed63800fc6da9	607d5110739df14e54d07 300
111	watsubo	5f75b5734fba00ffba66f5c8	605d57a5e06153af88066 386
112	yufengx	60069b65d3d83295bb0a4ceb	60745349dd9cdf8a6f8a7 d57
113	AKA-shi	5f85da05c0b491fbbf5fbc5a	609cbb2be94e6b7fb5bfa b88
	AngelaZebulonx <i>aka</i> amy0515	5ea76c023f2e0c37f197452c	5fd74dcf723199ce3f36af f1 WhatsApp: +8617394977655
	Annestephanie	607efe628b131abe8003abce	609ccb5b9941d9c590bca 763
	apowejiufa	5eb63138e4a2bd3bce74309a	6087881052c83270b0ead 369
	bambunatural	60857c037530ac710050eda9	609616707aaa85c6e0caa 753
	Beautiful metamorphosis	607f85f091605c0f987f094a	6096a58d9fd793ad8f951 34e
	Beebaer Shoes	5e743c907f526905dcd93b6f	60713db060d9961e30b4 9a57
	BetsyBridgetzPcPpV	5e93f32a7fbade2e52bd95bf	60a86b6b90d1fe74ecabfc 84
	Blue Princess	5fd72293e69fe8af463a5d6b	5ff95453f3fa9413dbf6d3 3c
	caiyohj5Sha	607e00a145810298527adb9d	609b4b5d440448e3b059 8fb6
	Cantsed	607e0957458102a0327adb8e	6098ec6672207500545b4 ef5
124	Cbarmen	6031e0ccb284a697d76efa29	6080d6c493394734fa6b2 ab9
125	cbvbyg	5e9fbe7713546c264adb0488	6075519ced4edb532bf0f b0e
	CGuttma	60856365a0ca850366063c83	60a603f42f5329f62a02b7 32
	Chenyijia Store	5de1f77929e7864da6dd6ba2	5f93f7ed341653136cafbd 36
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	cjeihf	5f39f28aa33e56027285fbf9	60892d19c9940fb08b62b 7c5
	Claudia Tour	6095662da2b1678e401e9b2b	60a50ee51fa96c5be51db 59a
	Colorine	6080f12bc3796206c044ff2e	609b3e75f72e1ebaba916 458
	Complete Tech	606b3b9c53adab0486eb094a	6087fa0e3febb68459fd08 bc
	David D Kettler	5e9fda56e2fac32f15704173	60a23734fa3fe18bd9b88 e04
	dazhanhongtu123	5dbf9508ff4ee603d3061c1a	606831ad68c614693c500 43c
	Drunk Labrador	60856e743752b4464361dde	60935b2d7c588b2c16b92 65b
	etplaza	601bc3cf79562f3f9152a54c	60960984385e8c766593e 11c

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137 F	arEast STAR	60957e5261f14a9ec0f5b951	bdf		
138 F	Telicitas A Coleman	5e9fdb98c96219003f445bdf	60a2372f881bba190cf9b a86		
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139 fl		5e731b54f56f7903403cf1fa	a26		
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142 g	etgreenfast	608b87a3b9dd22328327c78a	ab7 609bc7b290cddb1bafddf		
143 g	outoug2865	607ea4f920c98708c27c8cce	d1b		
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144 g	uillermoglover	5fc9a7df7f7f131deb10b4ef	cc9 6055cd4fab70688f5d39b		
145 H	Ieckoshoo79mW3	5e84334eff14ef62cd30727b	040		
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146 h	iovjhadkzfjhfgjnghjgyhjk	607275c6c534cd88d9242791	51a		
147 E	IiramAnnrAnTfM	5e9806bc29e7866bffe789be	60a9db24b9b0a581b3e70 eca	)	
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148 h	uchao1256	60716ac3ac47c8138240e303	092		
140 1	. Di i II	5 0400611 05 1 11 5 0 4 6	5fe58ba4b8347ec7f428fd	l	
149 H	HugoPhoebesH	5e9480fd1a25abaec1b7684f	47 6073ca67a84251f827029	,	
150 h	uirushangmaoss	5feeb1027d97042dc50ac898	e75		
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151 h	uzhoudamaige	5ad2e12eaac71f2e7d942afe	305		
152 Is	vyPetenZn	5e9555b565a17901acfc95ca	606a6dbeb342ac07f3413 add		
132 11	vyi etelizii	3693330303a17901ac16936a	6078043b7d4f4fa6f1439		
153 k	soenfuyu	5ea28fa69dffbe5e2702b872	367		
154 1	·	5 70 250 102 1 11 2 4 0 6 0 7	60a7d8f72a10a274a67f6	f	
154 L	atonyaToler	5e78c35f2d03ddb3e4a06e87	d3 60a2408a9fab1c5a48828		
155 lc	dlreyxnm	5fc2fc8802c9b3cea5090cff	cb6		
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156 L	gsasasuasbs	6072e0b0fb49a1ed82e32174	7f7 6097a01187cbf42a564e7		
157 li	intim	5ff48fa956c946d3cb01b246	b8c		
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139 10	JOHHWOIC	Jagouroc/140JuZcuC10C4UU	609b4a955f363262f311a		
160 lc	qqkjdakfassg	607289c88bd726970e5eaebe	8c0		
161	1.1 / 54101	(0/2 1075012512 m21 5142 (	6087b2521c5aede17864b		
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100 F	acinccoastralis	00/200710111740413133033	60a3e6be7c66f78d25ea3		
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1/2	W	00/31/100/10014330084a90	609e9854cc0620110719d	
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1/9	tiansjkea	3	7fc 60a730efe95b35d1dd462	
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100	Toocychankbhon	3C7+01010+0Cd+3C33788011	609e98333902fc47d9802	
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191	Bebidasrapidas	6096e47c30cddfb45cb6db0a	ccb	
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102	Bryan D Reynolds	5e96aaf53985223a5ee172bb	6060ea5 / /d4aa1efadec1c   50	
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194	ByronChloeaCeBl	5e97eac6ea18a54a93ccc8ec	008 008	
-/!	J		60b8670c8b30ec8143a2d	
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199	Efficient affilievivip i	369768a83db0034767746331	60b05f778a3dc5ba5e648
200	FARNCES	60863bc92446d52de0f3729f	571
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204	GarlLe	608852a7223f5d1dc2557f01	67
20.5	11 11 10		60b871bcab29368bd585e
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212	Jason C Sandin	5e96a61e6d2a2d039d2ade95	703
212	buson e sunum	2030401004242403344244033	60b86e8579d210841892
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215	Kirsten M Manrique	5e9fdeaa29e78626f25ae3fe	176
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216	La estancia ve	6096a14b8c2beebad7ebd94a	454
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226	Patricia L Krick	5e96c1e56d2a2d1a8c2adebe	8e6
220	- mileia L/ Ixilek	5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	60a60312b2aad82e4121e
227	Picinas y difrutes	608f32e4ec3d20c869fe9c38	129
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229	QuintinaSandyuQeN	5e75bb632d03dd0740a14a77	0ea4
	J		

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230	Revel Windmill	60956d91f3cd39807a951c0b	4c		
221	D -1 I	5 CC21-1- CC42 ( 11-005 G45 4C1 - (	6031351b82c6a8c03874c 979		
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237	songdan4772	603c84827ea46a8c7b2b97b7	d6f6		
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242	Ussiossop	60a0e5857dcbb143fe3dc4d2	7ef		
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243	Wiffistandes	b	58e 60bdaa6703e2eac0e7b80		
244	WSNBB world	60507bcd3d2d6a21822dedf0	331		
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	buycheapcocos	21622935	636668939		
259	chaneldior	21479673	684291303		
260	chayuan99	21132946	511894586		
261	danny_luxury_bag	21584604	615453601		
	Designer & hangbags aka dh_bag_jkshfkd	21646906	678390551		
263	duzhiy	21657184	 687162403		
264	factory8_store	21001267	410537656	387893884@qq.com	
265	fashionbags and jackets	21549949	680015628		

	aka unin188				
266	focusonjersey	21296818	548914714		
	gongjia	21204629	615247369		
	Guangzhou Fashion T- Bear Co.,Ltd				
	aka tradingbear	14772552	544761334		
	gzluxurybag	21660260	672560204		
	handbags618	21619014	626701132		
271	hlwygood	20609155	548819459		
272	jiayu22	21161324	628694241		
273	jiuyiyi	21651916	693035289		
274	jsm_shoes	21601207	643869233		
		Store No. 21563374 PayPal Account:			
275	Kanyeshoes350_014	c18059566122@163.com	567296408	WhatsApp: +8613977667766	
276	king01234	21229079	682589008		
277	kingremit02	21081488	631469833		
278	ladybag100	14385011	618578774		
279	laoyuan2	21672323	693024676		
280	luxury shops	21574426	603866846		
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	luxuryjewelryworld1	21357823	606864119		
	luxurysbag766	21633957	635488974		
284	lvvl bag	21572012	632433529		
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286	mrlizheng	20290604	639638316		
287	newbag999	21605164	618453121		
288	paike2025	21195509	632079054		
289	paikekeji	21191576	630592415		
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294	rose king	21228841	675853859		
	rose28	21225871	679152191		
	rose288	21226678	591536534		
	runxiao	21221729	553646403		
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	sneakersstore202009	21402612	589717416		
	sport0004 crossbody Brand luxury bag			0124	
	aka sport0004	20642763	648770841	cosysunny@126.com	
302	stylishhandbagsstore	21604571 Store No. 21612095	619075475		
303	sup bags2020	PayPal Account: lfr131124@gmail.com	617240583	WhatsApp: +8613861676165	

	supermail_1	21415277	587092076		
	tangtang2	21607063	616166428		
	therenobag	21677412	691922197		
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	topshoes7836	21605012	694037897		
309	urmoby	21463735	553493475		
	vivishoescity aka Jessie_luxury4	Store No. 14774868 PayPal Account: yunjiwsecsy@hotmail.com	544159956	WhatsApp: +8618620261057	
311	xiao985985	21215551	630341941		
312	xuanshu33	21161093	615247657		
313	xujin01	21668032	684841618		
	yiyu22	21161077	628694324		
	aceoutside	21640112	667376282		
	bingo44	21359953	628211830		
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	cicibags	21619364	693408985		
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323	EFFINI	21309004	 528515903		
324	fashion08008	21078998	662103112		
	hotlinechina	21646084	688519267		
	John shoes and bags factory				
	aka promotionking	21552685	633303513		
327	joo8277	21581520	688753768		
328	jooobag	21663539	689961632		
329	ladysbag999	21586939	597859624		
330	leochan16	20216802	582041117		
331	luxurybags06	21657177	689950746		
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345	shoessupplier2021	21684810	700128371
346	tianchennet	21665239	686332781
347	topdesignersneaker	21647256	658152194
348	viviboutique	21106803	532671791
349	xiangdingdang	21611256	628885728