

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

CHANEL, INC.,

Plaintiff,

vs.

ANALUXURYFASHION, *et al.*,

Defendants.

**PLAINTIFF’S NOTICE OF IDENTIFICATION OF ADDITIONAL PAYPAL
ACCOUNTS USED BY DEFENDANT NUMBERS 11, 16, 40-44, AND 47**

Plaintiff, Chanel, Inc. (“Plaintiff” or “Chanel”), by and through its undersigned counsel, hereby gives notice to the Court of its identification of additional PayPal accounts used by Defendant Numbers 11, 16, 40-44, and 47 (collectively “Defendants”) as identified on Schedule “A” hereto, to receive money in connection with Defendants’ Seller IDs and Subject Domain Names, also identified on Schedule “A” hereto, and states as follows:

1. On June 29, 2021, Plaintiff filed its *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets (the “Application for Temporary Restraining Order”) [ECF No. 6].¹ On July 2, 2021, the Court granted Plaintiff’s Application for Temporary Restraining Order and entered a Sealed Order Granting *Ex Parte* Application for Entry of Temporary Restraining Order (the “Sealed Temporary Restraining Order”).

¹ Plaintiff hereby incorporates by reference its Application for Temporary Restraining Order, together with supporting declarations and exhibits [ECF No. 6].

2. In the Court's Sealed Temporary Restraining Order, the Court ordered, *inter alia*, 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:

identify all funds in all financial accounts and/or sub-accounts associated with ... the Seller IDs and Subject Domain Names, 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)... accounts which transfer funds into the same financial institution account(s) or any of the other financial accounts subject to this Order; restrain the transfer of all funds, as opposed to ongoing account activity, held or received for their benefit ... and any other accounts tied thereto...

See Sealed Temporary Restraining Order at p. 13, Para. 9.

3. After the Court's entry of the Sealed Temporary Restraining Order, Plaintiff discovered Defendants are using the PayPal accounts identified on Schedule "A" hereto (the "Additional PayPal Accounts"), to receive money in connection with the sale of Plaintiff's branded goods through their Seller IDs and Subject Domain Names. (See Schedule "A" hereto; see also Declaration of Eric Rosaler in Support of Plaintiff's Notice of Identification of Additional PayPal Accounts Used By Defendant Numbers 11, 16, 40-44, and 47 and Composite Exhibit "1" attached thereto, filed herewith; Declaration of Kathleen Burns in Support of Plaintiff's Notice of

Identification of Additional PayPal Accounts Used By Defendant Numbers 11, 16, 40-44, and 47 and Composite Exhibit “1” attached thereto, filed herewith.)

4. Accordingly, pursuant to the Court’s July 2, 2021 Sealed Temporary Restraining Order, Plaintiff requested PayPal restrain all funds in Defendants’ Additional PayPal Accounts.

DATED: July 26, 2021.

Respectfully submitted,
STEPHEN M. GAFFIGAN, P.A.

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Attorneys for Plaintiff, Chanel, Inc.

SCHEDULE "A"
DEFENDANTS BY NUMBER, SELLER ID, SUBJECT DOMAIN NAME,
AND ADDITIONAL PAYPAL ACCOUNT

Def. No.	Defendant / Seller ID / Subject Domain Name	Additional PayPal Account	PayPal Payee Name	Email Address
11	love brand collection	376428493@qq.com		
16	yifeichong36241	675319957@qq.com		
40	wendco.shop	hytc201509@126.com	淄博浩源陶瓷材料有限公司 (Zibo Haoyuan Ceramic Material Co., Ltd.)	hello@nova.com hanli135790@gmail.com
40	bluediem.shop		淄博浩源陶瓷材料有限公司 (Zibo Haoyuan Ceramic Material Co., Ltd.)	hanli135790@gmail.com prediselhou50@gmail.com
40	furta.shop		淄博浩源陶瓷材料有限公司 (Zibo Haoyuan Ceramic Material Co., Ltd.)	hanli135790@gmail.com lavilyon.shop@ace.com jannegravie@gmail.com
40	guuliy.shop		Sihe Trading Co., Ltd.	hanli135790@gmail.com
40	inscon.shop		淄博浩源陶瓷材料有限公司 (Zibo Haoyuan Ceramic Material Co., Ltd.)	hanli135790@gmail.com
40	potark.shop		Sihe Trading Co., Ltd.	hanli135790@gmail.com wanlv Yuan502@gmail.com
40	ronio.shop		Sihe Trading Co., Ltd.	hanli135790@gmail.com
40	soloic.shop		Sihe Trading Co., Ltd.	hanli135790@gmail.com
40	viennais.shop		Sihe Trading Co., Ltd.	hanli135790@gmail.com
40	wesroles.shop		Sihe Trading Co., Ltd.	hanli135790@gmail.com
41	beliefal.com	attorney_float@zohomail.eu han85.yan@outlook.com complientne@zohomail.eu pengyong.leaf@yahoo.com finch.flam@gmail.com corn.pheasant@gmail.com peoriasing@yahoo.com jiaenjinshop@outlook.com mercifuledop@aol.com suicideop@yahoo.com mallliul@hotmail.com qizhong.linden@yahoo.com hu.baoping@outlook.com	Fun Pack Technology Co., Ltd. Yi Han Hao Clothing Co., Ltd Guangjian Intelligent Technology Co., Ltd. Jinxin Biwang Technology Co., Ltd. Tupaco Entertainment Co., Ltd. Anshiyu Co., Ltd. Yizeyan Co., Ltd. Jia Enjin Network Technology Co., Ltd. James Hannah Henan Ziliang Network Technology Co., Ltd. Fanao E-Commerce Co., Ltd. Xinnike Trading Co., Ltd.	
41	burlyts.com	astronomytong@zohomail.eu	Wenlin Technology Co., Ltd.	service.acx@gmail.com
41	serioususes.com	junqing.bark@hotmail.com	Yushun Trading Company	hotsstore@hotmail.com

41	welcomeal.com	cheng84.cosmos@outlook.com zhuchen.pea@outlook.com jianchun.78li@outlook.com li86.peng@outlook.com ants.eagle@yahoo.com yew_serw@yahoo.com parsley.eng@zohomail.eu fwierb@zohomail.com violentxiao@outlook.com cockedyu@aol.com giraffedeer@hotmail.com fujun.bitter@outlook.com routgfs@yahoo.com xiaomin.twig@outlook.com	Dan Ford Trading Company District Haiyu Non-staple Food Shop Chuangshicheng Network Technology Co., Ltd. Linwen Electronic Commerce Co., Ltd. Lancheng Fitness Management Co., Ltd. Laomipi Co., Ltd. Youdeka Technology Co., Ltd. Jingshi Co., Ltd. Aaron Sparks Linlinyu Hotel Management Co., Ltd. Xiangyun Hongyi Technology Co., Ltd. Zi'an Decoration Co., Ltd.	service.acx@gmail.com dawn-fast@outlook.com
42	tousikey.com	foshanak001@163.com	Foshan Jiyuanmei Electronic Commerce Co., Ltd.	tousikey@126.com
43	vlcase.com	2738429873@qq.com	深圳市豪佳杰贸易有限公司 (Shenzhen Haojiajie Trading Co., Ltd.)	
44	aililady.com	kyosal@163.com	聚优国际电子商务(深圳)有限公司 (Juyou International Electronic Commerce (Shenzhen) Co., Ltd.)	
44	alicemini.com	kyosal@163.com	聚优国际电子商务(深圳)有限公司 (Juyou International Electronic Commerce (Shenzhen) Co., Ltd.)	contact@alicemini.com 403592758@qq.com
47	luxekings.co	naman.paymentonline@gmail.com	Nguyễn Tấn Nam An	customers.contact.luxeking s@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was served this 26th day of July, 2021, upon Defendants via e-mail by providing the address to Plaintiff's Website to Defendants via the e-mail accounts provided by Defendants 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 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 via the registrar of record for the domain name and via Plaintiff's Website by posting a true and accurate copy of the foregoing on the URL appearing at <http://servingnotice.com/cp05e/index.html>.

Stephen M. Gaffigan

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