

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 5, 16, AND 19**

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 5, 16, and 19 (collectively “Defendants”) as identified on Schedule “A” hereto, to receive money in connection with Defendants’ sale of counterfeit Chanel-branded goods, 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 “Temporary Restraining Order”) [ECF No. 11].

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 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 Temporary Restraining Order at p. 13, Para. 9 [ECF No. 11].

3. After the Court's entry of the Temporary Restraining Order, Plaintiff learned 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, also set forth on Schedule "A" hereto (the "Seller IDs"). (See Declaration of Eric Rosaler in Support of Plaintiff's Notice of Identification of Additional PayPal Accounts Used By Defendant Numbers 5, 16, and 19 and Composite Exhibit "1" attached thereto, filed herewith.)

4. Accordingly, pursuant to the Court's July 2, 2021 Temporary Restraining Order [ECF No. 11], Plaintiff requested PayPal restrain all funds in Defendants' respective Additional PayPal Accounts.

DATED: September 9, 2021.

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

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

Def. No.	Defendant / Seller ID	Additional PayPal Account
5	cuiyeye2	5175209@qq.com
16	yifeichong36241	1969970170@qq.com
19	yaojiany	cuimingyingl@yeah.net

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was served this 9th day of September, 2021, upon Defendants via e-mail by providing the address to Plaintiff's Website to Defendants via the e-mail accounts at which Defendants were served 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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