

# Exhibit 1

**Shauna Doan**

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**From:** Thomas Cai <[he.cai@getechlaw.com](mailto:he.cai@getechlaw.com)>  
**Sent:** Monday, November 29, 2021 10:33 PM  
**To:** Shauna Doan  
**Cc:** linda lei  
**Subject:** Re: 81036-001103.Chanel, Inc.v.Shopify stores spitfice, et al.Case No.21-cv-61332.

Shauna,

Please let me know whether you can accept my client's counter offer. Thanks.

**Best Regards**

**Thomas Cai**

On Mon, Oct 11, 2021 at 5:21 PM Thomas Cai <[he.cai@getechlaw.com](mailto:he.cai@getechlaw.com)> wrote:  
Counsel,

Could you please follow up on this one? Thanks.

**Best Regards**

**Thomas Cai**

On Fri, Oct 1, 2021 at 2:51 AM Thomas Cai <[he.cai@getechlaw.com](mailto:he.cai@getechlaw.com)> wrote:  
Shauna,

Please follow up on my counter offer.Thanks.

**Best Regards**

**Thomas Cai**

On Thu, Sep 23, 2021 at 10:41 AM Thomas Cai <[he.cai@getechlaw.com](mailto:he.cai@getechlaw.com)> wrote:  
Shauna,

Please follow up on my last email. Thanks.

**Best Regards**

**Thomas Cai**

On Mon, Sep 13, 2021 at 4:38 PM Thomas Cai <[he.cai@getechlaw.com](mailto:he.cai@getechlaw.com)> wrote:  
Shauna,

Thanks for your offer, but my client has countered for \$ . Please advise.

**Best Regards**

**Thomas Cai**

On Fri, Sep 10, 2021 at 9:16 PM Shauna Doan <[shauna@smgpa.net](mailto:shauna@smgpa.net)> wrote:

Mr. Cai,

Heard back for this one as well, again thank you for your patience.

Our client is open to resolution with your client for \$ , entry of permanent injunction, and disclosure of supplier(s). *Please note that this offer expires in seven (7) days.*

If your client agrees, please provide me with your client's Legal Name in both English and Chinese, if applicable, and a copy of their identification showing the front and back.

Kind regards,

Shauna

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Shauna Doan

Legal Settlement Coordinator

STEPHEN M. GAFFIGAN, P.A.

401 East Las Olas Boulevard

Suite 130-453

Ft. Lauderdale, Florida 33301

Telephone: (954) 767-4819

E-mail: [shauna@smgpa.net](mailto:shauna@smgpa.net)

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**From:** Thomas Cai <[he.cai@getechlaw.com](mailto:he.cai@getechlaw.com)>  
**Sent:** Thursday, September 09, 2021 5:22 AM  
**To:** Shauna Doan <[shauna@smgpa.net](mailto:shauna@smgpa.net)>  
**Cc:** linda lei <[linda.lei@getechlaw.com](mailto:linda.lei@getechlaw.com)>  
**Subject:** Re: 81036-001103.Chanel, Inc.v.Shopify stores spitfice, et al.Case No.21-cv-61332.

Shauna,

Could you please follow up on this one? Thanks.

**Best Regards**

**Thomas Cai**

On Thu, Sep 2, 2021 at 5:58 PM Thomas Cai <[he.cai@getechlaw.com](mailto:he.cai@getechlaw.com)> wrote:

Shauna,

Please any update on this one? Thanks.

**Best Regards**

**Thomas Cai**

On Thu, Aug 26, 2021 at 10:00 AM Thomas Cai <[he.cai@getechlaw.com](mailto:he.cai@getechlaw.com)> wrote:

Shauna,

Will do. Thank you.

**Best Regards**

**Thomas Cai**

On Wed, Aug 25, 2021 at 8:38 PM Shauna Doan <[shauna@smgpa.net](mailto:shauna@smgpa.net)> wrote:

Mr. Cai,

Yes, please direct emails to me, and please remove Raquel from the cc list as she was only assisting during my leave.

This is with the client – a lot of people are out on holiday and I am not hearing back immediately, but please accept this as receipt of your request and once I hear back I will contact you.

Kind regards,

Shauna

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Shauna Doan

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**From:** Thomas Cai <[he.cai@getechlaw.com](mailto:he.cai@getechlaw.com)>

**Sent:** Wednesday, August 25, 2021 5:48 AM

**To:** Shauna Doan <[shauna@smgpa.net](mailto:shauna@smgpa.net)>

**Cc:** Raquel Wiborg-Rodriguez <[raquel@smgpa.net](mailto:raquel@smgpa.net)>; [linda.lei@getechlaw.com](mailto:linda.lei@getechlaw.com)

**Subject:** Re: 81036-001103.Chanel, Inc.v.Shopify stores spitfice, et al.Case No.21-cv-61332.

Dear Shauna,

Please follow up on this one, as you advised me to direct all emails to you. Thanks.

**Best Regards**

**Thomas Cai**

On Thu, Aug 19, 2021 at 6:01 PM Thomas Cai <[he.cai@getechlaw.com](mailto:he.cai@getechlaw.com)> wrote:

Raquel,

Please follow up on my counter offer.Thanks.

**Best Regards**

**Thomas Cai**

On Thu, Aug 12, 2021 at 5:49 PM Thomas Cai <[he.cai@getechlaw.com](mailto:he.cai@getechlaw.com)> wrote:

Raquel,

My client is willing to settle this matter for \$ . Please let me know whether it is acceptable. Thanks.

**Best Regards**

Thomas Cai

On Wed, Aug 11, 2021 at 11:37 PM Raquel Wiborg-Rodriguez <[raquel@smgpa.net](mailto:raquel@smgpa.net)> wrote:

Hi Thomas,

I am confirming receipt of this e-mail as well. Again, you can access the evidence via Plaintiff's Website: <http://servingnotice.com/cp05e/index.html>. Is there an offer you'd like my client to consider?

Kind regards,

Raquel

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**From:** Shauna Doan <[shauna@smgpa.net](mailto:shauna@smgpa.net)>  
**Sent:** Wednesday, August 11, 2021 5:58 AM  
**To:** Raquel Wiborg-Rodriguez <[raquel@smgpa.net](mailto:raquel@smgpa.net)>  
**Subject:** FW: 81036-001103.Chanel, Inc.v.Shopify stores spitfice, et al.Case No.21-cv-61332.

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**From:** Thomas Cai  
**Sent:** Wednesday, August 11, 2021 5:57:35 AM (UTC-05:00) Eastern Time (US & Canada)  
**To:** Shauna Doan  
**Cc:** linda lei  
**Subject:** Re: 81036-001103.Chanel, Inc.v.Shopify stores spitfice, et al.Case No.21-cv-61332.

Shauna,

Please follow up on this one. Thanks.

Best Regards



**Thomas Cai**

On Fri, Aug 6, 2021 at 10:06 AM Thomas Cai <[he.cai@getechlaw.com](mailto:he.cai@getechlaw.com)> wrote:

Shauna,

My client confirmed that the four stores belong to him.

**Best Regards**

**Thomas Cai**

On Thu, Aug 5, 2021 at 10:55 PM Shauna Doan <[shauna@smgpa.net](mailto:shauna@smgpa.net)> wrote:

Mr. Cai,

Are these stores owned by one person?

Kind regards,

Shauna

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Shauna Doan

Legal Settlement Coordinator

STEPHEN M. GAFFIGAN, P.A.

401 East Las Olas Boulevard

Suite 130-453

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**From:** Thomas Cai <[he.cai@getechlaw.com](mailto:he.cai@getechlaw.com)>

**Sent:** Wednesday, August 04, 2021 5:14 AM

**To:** Diana Cecil-Payne <[diana@smgpa.net](mailto:diana@smgpa.net)>

**Cc:** Shauna Doan <[shauna@smgpa.net](mailto:shauna@smgpa.net)>; linda lei <[linda.lei@getechlaw.com](mailto:linda.lei@getechlaw.com)>

**Subject:** 81036-001103.Chanel, Inc.v.Shopify stores spitfice, et al.Case No.21-cv-61332.

Counsel,

We represent the below four online stores in Case No. 21-cv-61332.

Shopify Stores: spitfice ( Email: [htang8859@gmail.com](mailto:htang8859@gmail.com) )

jiyuanm ( Email: [2911800416@qq.com](mailto:2911800416@qq.com) )

tousikey ( Email: [htang8859@gmail.com](mailto:htang8859@gmail.com) )

esunnily ( Email: [820639237@qq.com](mailto:820639237@qq.com) )

Could you please send us the infringing evidence, let us know how much is being restrained in the accounts and your demands for settlement purposes. Thank you.

**Best Regards**

**Thomas Cai**