

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 16-cv-62612-BLOOM/Valle

RICHEMONT INTERNATIONAL SA,
CARTIER INTERNATIONAL A.G.,
MONTBLANC-SIMPLO GMBH,
CHLOE S.A.S., and OFFICINE
PANERAI A.G.,

Plaintiffs,

vs.

REPLICAWATCHESMAN.COM, *et al.*,

Defendants.

FINAL DEFAULT JUDGMENT AND PERMANENT INJUNCTION

THIS CAUSE is before the Court upon Plaintiffs', Richemont International SA, Cartier International A.G., Montblanc-Simplo GMBH, Chloe S.A.S., and Officine Panerai A.G. (collectively "Plaintiffs")¹ Motion for Entry of Final Default Judgment Against Defendants, ECF No. [40] ("Motion"), filed on February 15, 2017. The Court granted the Motion by separate Order. Pursuant to Federal Rule of Civil Procedure 58(a), it is

ORDERED AND ADJUDGED that Final Default Judgment is entered in favor of Plaintiffs and against Defendants, the Individuals, Partnerships, and Unincorporated Associations identified on Schedule "A" hereto (collectively, "Defendants") on all Counts of the Complaint as follows:

¹ Plaintiffs are all subsidiaries of Compagnie Financière Richemont SA, which is one of the world's leading luxury goods groups.

(1) Permanent Injunctive Relief:

Defendants and their officers, directors, agents, representatives, subsidiaries, distributors, servants, employees and attorneys, and all persons acting in concert and participation with Defendants are hereby permanently restrained and enjoined from:

- a. manufacturing or causing to be manufactured, importing, advertising, or promoting, distributing, selling or offering to sell counterfeit and infringing goods bearing Plaintiffs' trademarks, identified in (i) Paragraph 22 of the Complaint and Schedule "B" attached thereto (the "CARTIER Marks"), (ii) Paragraph 28 of the Complaint and Schedule "C" attached thereto (the "MONTBLANC Marks"), (iii) Paragraph 34 of the Complaint and Schedule "D" attached thereto (the "CHLOE Mark"), (iv) Paragraph 40 of the Complaint and Schedule "E" attached thereto (the "PANERAI Marks"), (v) Paragraph 46 of the Complaint and Schedule "F" attached thereto (the "IWC Marks", "BAUME & MERCIER Marks", and "VACHERON CONSTANTIN Marks") (collectively, the "Plaintiffs' Marks");
- b. using Plaintiffs' Marks in connection with the sale of any unauthorized goods;
- c. using any logo, and/or layout which may be calculated to falsely advertise the services or products of Defendants offered for sale or sold via the Internet websites using the domain names identified on Schedule "A" hereto (the "Subject Domain Names") and/or any other Internet website,

domain name, or business, as being sponsored by, authorized by, endorsed by, or in any way associated with Plaintiffs;

- d. falsely representing themselves as being connected with Plaintiffs, through sponsorship or association;
- e. engaging in any act which is likely to falsely cause members of the trade and/or of the purchasing public to believe any goods or services of Defendants offered for sale or sold via the Subject Domain Names and/or any other Internet website, domain name, or business, are in any way endorsed by, approved by, and/or associated with Plaintiffs;
- f. using any reproduction, counterfeit, copy, or colorable imitation of Plaintiffs' Marks in connection with the publicity, promotion, sale, or advertising of any goods sold by Defendants via the Subject Domain Names, and/or any other Internet website, domain name, or business;
- g. affixing, applying, annexing or using in connection with the sale of any goods, a false description or representation, including words or other symbols tending to falsely describe or represent goods offered for sale or sold by Defendants via the Subject Domain Names and/or any other Internet website, domain name, or business, as being those of Plaintiffs or in any way endorsed by Plaintiffs and from offering such goods in commerce;
- h. otherwise unfairly competing with Plaintiffs;
- i. using Plaintiffs' 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 from any other form of use of such terms which are visible to a computer user or serves to direct computer searches to websites registered, owned, or operated by Defendants, including the Internet websites operating under all of the Subject Domain Names; and
- j. effecting assignments or transfers, forming new entities or associations or utilizing any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth above.

(2) **Additional Equitable Relief:**

- a. In order to give practical effect to the Permanent Injunction, the Subject Domain Names are hereby ordered to be immediately transferred by Defendants, their assignees and/or successors in interest or title, and the Registrars to Plaintiffs' control. To the extent the current Registrars do not facilitate the transfer of the domain names to Plaintiffs' control within five (5) days of receipt of this judgment, the Registries shall, within thirty (30) days, change the Registrar of Record for the Subject Domain Names to a Registrar of Plaintiffs' choosing, and that Registrar shall transfer those Subject Domain Names to Plaintiffs; and
- b. Upon Plaintiffs' request, the top level domain (TLD) Registry for each of the Subject Domain Names, or its administrators, including backend registry operators or administrators, within thirty (30) days of receipt of this Order, shall place the Subject Domain Names on Registry Hold status

for the life of the current registration, thus removing them from the TLD zone files maintained by the Registry which link the Subject Domain Names to the IP addresses where the associated websites are hosted.

(3) **Statutory damages pursuant to 15 U.S.C. § 1117(c):**

Plaintiffs are entitled to an award of statutory damages of **\$1,000,000.00** against each Defendant pursuant to 15 U.S.C. § 1117(c), for which let execution issue;

(4) **Statutory damages pursuant to 15 U.S.C. § 1117(d):**

Statutory damages in favor of Plaintiffs pursuant to 15 U.S.C. § 1117(d), are determined to be:

- a. **\$3,500,000.00** against Defendant 1 – replicawatchesman.com, for its bestmontblancpens.top, cartierwatches.click, copyiwc.top, iwccousteau.top, iwcfajones.top, iwcvintage.top, iwcwatcher.top, iwcwatchesfamous.top, iwcwatchreplica.com, montblanc-pens.top, montblancpensjapan.top, montblancpensmylove.top, montblancpensvip.com, montblancpenswholesaleprice.top, onlineiwcwatches.top, onlinemontblancpensforsale.top, paneraiwatchcheapprice.top, paneraiwatches216.top, paneraiwatchesforsale.top, penerailuxury.top, peneraiwatch.top, replicacartier.org, worldfamoussiwcwatches.top, classicalattractiwc.top, copycartierwatch.com, iwcwatches.vip, montblanc149.top, montblancpenscheap.top, montblancpensdiscount.top, montblancpensonline.top, montblancpenssale.top, newmontblancpens.top, replicaiwcwatches.trade, fakepaneraiwatches.com, and isolandiwcwatches.top domain names, for which let execution issue;
- b. **\$200,000.00** against Defendant 8 – breitlingwatch.site, for its montblancpen.org and montblancpens.org domain names, for which let execution issue.
- c. **\$100,000.00** against Defendant 9 – cartierlovebraceletjewelry.com, for its cartierlovebraceletjewelry.com domain name, for which let execution issue.

- (5) The Clerk of Court shall **RELEASE** the bond posted by Plaintiffs in the amount of \$10,000.00.

- (6) Interest from the date this action was filed shall accrue at the legal rate pursuant to 28 U.S.C. § 1961.
- (7) The Court retains jurisdiction to enforce this Judgment and Permanent Injunction.
- (8) The Clerk of Court is directed to **CLOSE** this case.
- (9) All pending Motions are **DENIED** as moot.

DONE AND ORDERED in Miami, Florida this 17th day of February, 2017.



BETH BLOOM
UNITED STATES DISTRICT JUDGE

Copies to:

Counsel of Record

SCHEDULE "A"
DEFENDANTS BY NUMBER AND SUBJECT DOMAIN NAME

Defendant Number	Domain Names
1	replicawatchesman.com
1	11topbrandwatches.top
1	5truss.top
1	beautifulwatches.top
1	bestmontblancpens.top
1	bestswisswatches.top
1	bestwatchesgiveyou.top
1	bookreplicawatches.com
1	brandwatches-onlinesale.top
1	cartierwatches.click
1	cheapwatchesforsale.top
1	chefworkcentral.top
1	classicalwatchesforcheap.top
1	clonewatches.top
1	copyiwc.top
1	designerwatches.top
1	famouswatchesonline.top
1	furnitureonusa.top
1	giftpens.top
1	goodwatches.top
1	greattopwatches.top
1	gwatches.top
1	highcopywatches.top
1	hotofficing.top
1	hotreplicawatches9.top
1	hotwatches9.top
1	iwccousteau.top
1	iwcfajones.top
1	iwcvintage.top
1	iwcwatcher.top
1	iwcwatchesfamous.top
1	iwcwatchreplica.com
1	ladieswatches.top
1	lowpricewatches.top
1	montblanc-pens.top
1	montblancpensjapan.top

1	montblancpensmylove.top
1	montblancpensvip.com
1	montblancpenswholesaleprice.top
1	nwatches.top
1	offerwatches.top
1	onlineiwcwatches.top
1	onlinemontblancpensforsale.top
1	onlinewatches.top
1	onlinewatches11.top
1	outletwatches.top
1	outletwatchesforyou.top
1	paneraiwatchcheapprice.top
1	paneraiwatches216.top
1	paneraiwatchesforsale.top
1	penerailuxury.top
1	peneraiwatch.top
1	relojesomega.top
1	replicacartier.org
1	replica-watches.me
1	replicawatches4u.com
1	replicawatchesbank.com
1	saleonlineforwatches.top
1	showtimewatches.top
1	topfamourswatches.top
1	topforwatches.top
1	topzoken.top
1	vintagewatches.top
1	vintagewatchesforcheap.top
1	watchbrands.top
1	watches2016.top
1	watchesbestcom.top
1	watchesforcheap.top
1	watchesfromswiss.top
1	watchesher.top
1	watchesonlinesale.top
1	watchesonlineshop.top
1	watchesonlinestore.top
1	watchesoutletforsale.top
1	watchesoutletonlinestore.top

1	watchessaler.top
1	watches-swiss.top
1	watchesus.top
1	watcheswholesale.top
1	watcheswholesaleonline.top
1	watcheswomen.top
1	watchonlineshop.top
1	worldfamouisiwcwatches.top
1	wristwatchsale.top
1	classicalattractiwc.top
1	topbrandwatch.top
1	ads4edu.com
1	boxreplicawatches.com
1	classwatches.net
1	copycartierwatch.com
1	enoughwatch.com
1	kenzoki.net
1	kssdqy.com
1	omegaems.com
1	rodandocamara.com
1	sale-watches.com
1	senior-watches.com
1	discountonwatches.com
1	hbsy009.com
1	replicawatchesus.com
1	syguke.com
1	watches-zone.net
1	hellodavie.com
1	nb3h.com
1	aaareplicawatches.top
1	buywatches.top
1	cheap-swisswatches.top
1	classicalwatchessale.top
1	enoughwatch.top
1	highqualityreplicawatches.top
1	iwcwatches.vip
1	menswatchesonsale.top
1	montblanc149.top
1	montblancpenscheap.top

1	montblancpensdiscount.top
1	montblancpensonline.top
1	montblancpenssale.top
1	newmontblancpens.top
1	numerimusic.org
1	outletwatches21.top
1	perfectreplicawatches.vip
1	popularmenswatches.top
1	replicaiwcwatches.trade
1	replicamenswatches.top
1	replicaperfectwatches.top
1	replicaswisswatches.top
1	replicawatches2017.top
1	replicawatchescopy.com
1	replicawatchesreviews.org
1	swisswatche.top
1	swisswatches.top
1	ub7r.com
1	ucybr.com
1	watchesforluxury.top
1	watchesforsale.top
1	fakepaneraiwatches.com
1	isolandiwcwatches.top
1	replicabestwatches.org
2	arwwatches.com
3	bbestwatches.com
4	beltfake.top
5	fakehandbags.top
5	handbagreplica.top
5	handbagscheap.top
5	leathersandals.website
5	replicahatbox.top
5	shoesreplicaknockoff.online
6	bestreplicawatchesuk.co.uk
7	bestrolexreplica.co.uk
8	breitlingwatch.site
8	cheapwatchreplic.site
8	customwatches.top
8	designerwatch.site

8	fakeswisswatches.top
8	fakewatches.site
8	fakewatchesuk.site
8	futuristicwatches.top
8	genevawatch.top
8	hublotwatch.site
8	mensblackwatches.top
8	mensdesignerwatches.site
8	mensgoldwatches.top
8	menluxurywatches.site
8	mensrolexwatches.top
8	menwatches.site
8	namebrandwatches.top
8	nicemenswatches.site
8	nicemenswatches.top
8	nicewatchesformen.top
8	omegamenswatches.top
8	omegawatches.space
8	replicawatchesstore.top
8	replicawatches-swiss.top
8	rosegoldwatches.top
8	swisslegendwatches.top
8	topmenswatches.site
8	topmenswatches.top
8	uniquewatches.top
8	usedwatches.site
8	usedwatches.top
8	usedwatches.xyz
8	watchescopy.site
8	watchesforsale.site
8	cheap-watches.top
8	watchesreplica.xyz
8	watchesales.top
8	watches-shop.top
8	cool-watches.top
8	luxurywatch.site
8	watcheslove.net
8	watchesprice.org
8	watchlove.top

8	watchreplica.space
8	watchrepliclove.top
8	watchstore.xyz
8	bestfakewatches.xyz
8	bestreplica.org
8	bestwatchreplica.org
8	brandwatches.xyz
8	breitlingbentley.xyz
8	breitlingmens.top
8	breitlingwatch.org
8	breitlingwatches.win
8	cheapwatch.online
8	cheapwatches.website
8	cheapwatchesformen.space
8	classicwatches.site
8	discountwatches.site
8	feseek.com
8	garagezale.com
8	goldwatchesforwomen.online
8	goldwatchesforwomen.top
8	highendwatches.online
8	hublotwatch.xyz
8	iron-watch.top
8	jwrecovery.org
8	ladieswatches.online
8	luxury-watches.online
8	luxurywatches.win
8	luxurywatchlove.online
8	mens-watch.xyz
8	menswatches.space
8	menswatchsales.online
8	menswatchsales.top
8	omegaconstellation.biz
8	omegadeville.xyz
8	omegawatch.site
8	relicwatches.online
8	replicawatch.online
8	replicawatchgoods.top
8	replicawatchstore.org

8	rolexdatejust.online
8	rolexdeepsea.top
8	rolexmilgauss.xyz
8	rolexsubmarinerblue.top
8	rolexwatcheslove.top
8	swisswatchmen.top
8	swisswatchmen.xyz
8	tagwatches.online
8	topwatchlove.top
8	uniquewatches.online
8	usedwatches.online
8	watchesfakecheap.top
8	watchesformen.online
8	watchesformen.win
8	watchesformenmco.xyz
8	watches-shock.top
8	watches-shop.club
8	watchesstores.top
8	watchestop.xyz
8	watchforum.top
8	watchonsale.top
8	watchreplica.host
8	watchreplicalove.online
8	watchreplicaonline.org
8	watchreplicatop.top
8	womens-watches.org
8	genevawatches.xyz
8	goldwatchesforwomen.xyz
8	highendwatches.top
8	montblancpen.org
8	montblancpens.org
8	replicawatcheslove.xyz
8	topreplicawatch.top
8	watchesvipstore.org
8	watchswordartonline.org
9	cartierlovebraceletjewelry.com
10	climatizzatorecondizionatori.com
11	deals4uwatches.com
12	globalwholesaleshop.net

13	hqluxury.com
14	kingwatch.co.uk
15	kingwatch.info
16	repbagsbulk.com
17	replicafory.com
18	shopinglobal.com
19	uk-replica-watches.co.uk
20	usinwatches.com
21	watchesen.top
21	watchestop.top
21	watchsen.top