

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.**

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

Plaintiffs,

vs.

THE INDIVIDUALS, PARTNERSHIPS,
AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON
SCHEDULE "A,"

Defendants.

COMPLAINT FOR INJUNCTIVE RELIEF AND DAMAGES

Plaintiffs, Richemont International SA, Cartier International A.G., Montblanc-Simplo GMBH, Chloe S.A.S., and Officine Panerai A.G. (collectively "Plaintiffs"),¹ hereby sue Defendants, the Individuals, Partnerships and Unincorporated Associations identified on Schedule "A" hereto (collectively "Defendants"). Defendants are promoting, selling, offering for sale and distributing goods using counterfeits and confusingly similar imitations of Plaintiffs' respective trademarks within this district through various fully interactive commercial Internet websites operating under their individual, partnership, and/or business association names identified on Schedule "A" hereto (the "Subject Domain Names"). In support of their claims, Plaintiffs allege as follows:

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

JURISDICTION AND VENUE

1. This is an action for federal trademark counterfeiting and infringement, false designation of origin, cybersquatting, common law unfair competition, and common law trademark infringement pursuant to 15 U.S.C. §§ 1114, 1116, 1125(a), and 1125(d), and The All Writs Act, 28 U.S.C. § 1651(a). Accordingly, this Court has subject matter jurisdiction over this action pursuant to 15 U.S.C. § 1121 and 28 U.S.C. §§ 1331 and 1338. This Court has supplemental jurisdiction pursuant to 28 U.S.C. § 1367 over Plaintiffs' state law claims because those claims are so related to the federal claims that they form part of the same case or controversy.

2. Defendants are subject to personal jurisdiction in this district because they operate commercial websites accessible in this district and direct business activities towards consumers throughout the United States, including within the State of Florida and this district through at least the fully interactive commercial Internet websites operating under the Subject Domain Names.

3. Venue is proper in this Court pursuant to 28 U.S.C. § 1391 since Defendants are, upon information and belief, aliens who engage in infringing activities and cause harm within this district by advertising, offering to sell, and/or selling infringing products into this district.

THE PLAINTIFFS

4. Plaintiff Cartier International A.G. ("Cartier") is a public limited company organized and existing under the laws of Switzerland, having its principal place of business at Hinterbergstrasse 22, Postfach 61, 6312 Steinhausen, Switzerland.

5. Plaintiff Montblanc-Simplo GMBH (“Montblanc”) is a company organized and existing under the laws of Germany, having its principal place of business at Hellgrundweg 100, 22525 Hamburg, Germany.

6. Plaintiff Chloe S.A.S. (“Chloe”) is a company organized and existing under the laws of France, having its principal place of business at 5/7 Avenue Percier, 75008 Paris, France.

7. Plaintiff Officine Panerai A.G. (“Panerai”) is a public company organized and existing under the laws of Switzerland, having its principal place of business at Hinterbergstrasse 22, Postfach 61, 6312 Steinhausen, Switzerland.

8. Plaintiff Richemont International S.A. (“Richemont”) is a public limited company organized and existing under the laws of Switzerland, having its principal place of business at 10 Route des Biches, Villar-sur-Glane, Fribourg, Switzerland. Richemont’s Maisons include, *inter alia*, IWC Schaffhausen (“IWC”), Baume & Mercier (“Baume & Mercier”), and Vacheron Constantin (“Vacheron Constantin”).

9. Plaintiffs’ trademarked goods are offered for sale and sold through various channels of trade within the State of Florida, including this district, and throughout the United States. Defendants, through the sale and offering for sale of counterfeit and infringing versions of Plaintiffs’ branded products, are directly, and unfairly, competing with Plaintiffs’ economic interests in the State of Florida and causing Plaintiffs harm within this jurisdiction.

10. Like many other famous trademark owners in the luxury goods market, Plaintiffs suffer ongoing daily and sustained violations of their respective trademark rights at the hands of counterfeiters and infringers, such as Defendants herein, who wrongfully reproduce and counterfeit Plaintiffs’ individual trademarks for the twin purposes of (i) duping and confusing the consuming public and (ii) earning substantial profits.

11. In order to combat the indivisible harm caused by the combined actions of Defendants and others engaging in similar conduct, each year Plaintiffs expend significant monetary resources in connection with trademark enforcement efforts. The recent explosion of counterfeiting over the Internet has created an environment that requires companies, such as Plaintiffs, to file a number of lawsuits, often it later turns out, against the same individuals and groups, in order to protect both consumers and themselves from the ill effects of confusion and the erosion of the goodwill associated with Plaintiffs' respective brands.

THE DEFENDANTS

12. Defendants operate through domain names registered with registrars in multiple countries, and are comprised of individuals, partnerships, and/or business entities of unknown makeup, whom, upon information and belief, reside and/or operate in foreign jurisdictions, including the People's Republic of China. Defendants have the capacity to be sued pursuant to Federal Rule of Civil Procedure 17(b). Defendants target their business activities towards consumers throughout the United States, including within this district through the simultaneous operation of at least the fully interactive commercial Internet websites existing under the Subject Domain Names.

13. Upon information and belief, Defendants use aliases in conjunction with the operation of their businesses, including but not limited to those identified by the same Defendant Number on Schedule "A" hereto.

14. Upon information and belief, Defendants are directly and personally contributing to, inducing and engaging in the sale of counterfeit branded products as alleged herein, often times as partners, co-conspirators and/or suppliers.

15. Defendants are part of an ongoing scheme to create and maintain an illegal marketplace enterprise on the World Wide Web, which (i) confuses consumers regarding the source of Defendants' goods for profit, and (ii) expands the marketplace for illegal, counterfeit versions of Plaintiffs' branded goods while shrinking the legitimate marketplace for Plaintiffs' genuine branded goods. The natural and intended byproduct of Defendants' actions is the erosion and destruction of the goodwill associated with Plaintiffs' respective famous names and associated trademarks, as well as the destruction of the legitimate market sector in which they operate.

16. Defendants are the past and present controlling forces behind the operation of commercial Internet websites operating under, at least, the Subject Domain Names.

17. Upon information and belief, Defendants directly engage in unfair competition with Plaintiffs by (i) advertising, offering for sale and/or selling goods using counterfeits and infringements of one or more of Plaintiffs' individual trademarks to consumers within the United States and this district through multiple fully interactive commercial Internet websites operating under the Subject Domain Names and additional domains and websites not yet known to Plaintiffs and (ii) creating and maintaining an illegal marketplace enterprise for the purpose of diverting business from Plaintiffs' legitimate marketplace for their genuine goods. Defendants have purposefully directed some portion of their illegal activities towards consumers in the State of Florida through the advertisement, offer to sell, sale, and shipment of counterfeit branded goods into the State, and by operating an illegal marketplace enterprise which impacts and interferes with commerce throughout the United States, including within the State of Florida.

18. Upon information and belief, Defendants have registered, established or purchased, and maintained their respective Subject Domain Names and the websites operating

thereunder. Upon information and belief, many Defendants have engaged in fraudulent conduct with respect to the registration of the Subject Domain Names by providing false and/or misleading information to their various registrars during the registration or maintenance process. Upon information and belief, many Defendants have registered and maintained their Subject Domain Names for the sole purpose of engaging in illegal counterfeiting activities.

19. Upon information and belief, Defendants will continue to register or acquire new domain names for the purpose of selling and/or offering for sale goods using counterfeit and confusingly similar imitations of Plaintiffs' respective trademarks unless preliminarily and permanently enjoined. Moreover, upon information and belief, Defendants will continue to maintain and grow their illegal marketplace enterprise at Plaintiffs' expense unless preliminarily and permanently enjoined.

20. Defendants' entire Internet-based website businesses amount to nothing more than illegal operations established and operated in order to infringe the intellectual property rights of Plaintiffs and others.

21. Defendants' business names, i.e., the Subject Domain Names and any other domain names used in connection with the sale of counterfeit and infringing goods using Plaintiffs' respective trademarks are essential components of Defendants' counterfeiting and infringing activities and are the means by which Defendants further their counterfeiting and infringing scheme and cause harm to Plaintiffs. Moreover, Defendants are using Plaintiffs' respective famous names and associated trademarks to drive Internet consumer traffic to their websites operating under the Subject Domain Names, thereby creating and increasing the value of the Subject Domain Names and decreasing the size and value of Plaintiffs' legitimate consumer marketplace at Plaintiffs' expense.

COMMON FACTUAL ALLEGATIONS

Cartier's Trademark Rights

22. Cartier is the owner of the trademarks identified on Schedule "B" hereto (collectively, the "CARTIER Marks"), which are valid and registered on the Principal Register of the United States Patent and Trademark Office. The CARTIER Marks are used in conjunction with the manufacture and distribution of high quality goods in the categories identified in Schedule "B." True and correct copies of the Certificates of Registration for the CARTIER Marks are attached hereto as Composite Exhibit "1."

23. The CARTIER Marks have been used in interstate commerce to identify and distinguish Cartier's high quality goods for an extended period of time and serves as a symbol of Cartier's quality, reputation and goodwill.

24. Further, Cartier and related companies have expended substantial time, money and other resources developing, advertising and otherwise promoting the CARTIER Marks. The CARTIER Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

25. Cartier and related companies have extensively used, advertised and promoted the CARTIER Marks in the United States in connection with the sale of high quality luxury goods. As a result, the CARTIER Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as an identifier of high quality goods.

26. Cartier has carefully monitored and policed the use of the CARTIER Marks and has never assigned or licensed the CARTIER Marks to any Defendant in this matter.

27. Genuine goods using the CARTIER Marks are widely legitimately advertised and promoted by Cartier and related companies, and authorized distributors via the Internet. Over

the course of the past ten years, visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Cartier's overall marketing and consumer education efforts. Thus, Cartier expends significant monetary resources on Internet marketing and consumer education, including search engine optimization ("SEO") strategies. Those strategies allow Cartier and its authorized retailers to fairly and legitimately educate consumers about the value associated with the CARTIER Marks and the goods sold thereunder.

Montblanc's Trademark Rights

28. Montblanc is the owner of the trademarks identified on Schedule "C" hereto (collectively, the "MONTBLANC Marks"), which are valid and registered on the Principal Register of the United States Patent and Trademark Office. The MONTBLANC Marks are used in conjunction with the manufacture and distribution of high quality goods in the categories identified in Schedule "C." True and correct copies of the Certificates of Registration for the MONTBLANC Marks are attached hereto as Composite Exhibit "2."

29. The MONTBLANC Marks have been used in interstate commerce to identify and distinguish Montblanc's high quality goods for an extended period of time and serves as a symbol of Montblanc's quality, reputation and goodwill.

30. Further, Montblanc has expended substantial time, money and other resources developing, advertising and otherwise promoting the MONTBLANC Marks. The MONTBLANC Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

31. Montblanc has extensively used, advertised and promoted the MONTBLANC Marks in the United States in connection with the sale of high quality luxury goods. As a result, the MONTBLANC Marks are among the most widely recognized trademarks in the United

States, and the trademarks have achieved secondary meaning as an identifier of high quality goods.

32. Montblanc has carefully monitored and policed the use of the MONTBLANC Marks and has never assigned or licensed the MONTBLANC Marks to any Defendant in this matter.

33. Genuine goods using the MONTBLANC Marks are widely legitimately advertised and promoted by Montblanc, its authorized distributors, and unrelated third parties via the Internet. Over the course of the past ten years, visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Montblanc's overall marketing and consumer education efforts. Thus, Montblanc expends significant monetary resources on Internet marketing and consumer education, including search engine optimization ("SEO") strategies. Those strategies allow Montblanc and its authorized retailers to fairly and legitimately educate consumers about the value associated with the MONTBLANC Marks and the goods sold thereunder.

Chloe's Trademark Rights

34. Chloe is the owner of the trademark identified on Schedule "D" hereto (the "CHLOE Mark"), which is valid and registered on the Principal Register of the United States Patent and Trademark Office. The CHLOE Mark is used in conjunction with the manufacture and distribution of high quality goods in the categories identified in Schedule "D." A true and correct copy of the Certificate of Registration for the CHLOE Mark is attached hereto as Exhibit "3."

35. The CHLOE Mark has been used in interstate commerce to identify and distinguish Chloe's high quality goods for an extended period of time and serves as a symbol of Chloe's quality, reputation and goodwill.

36. Further, Chloe has expended substantial time, money and other resources developing, advertising and otherwise promoting the CHLOE Mark. The CHLOE Mark qualifies as a famous mark as that term is used in 15 U.S.C. §1125(c)(1).

37. Chloe has extensively used, advertised and promoted the CHLOE Mark in the United States in connection with the sale of high quality luxury goods. As a result, the CHLOE Mark is among the most widely recognized trademarks in the United States, and the trademark has achieved secondary meaning as an identifier of high quality goods.

38. Chloe has carefully monitored and policed the use of the CHLOE Mark and has never assigned or licensed the CHLOE Mark to any Defendant in this matter.

39. Genuine goods using the CHLOE Mark are widely legitimately advertised and promoted by Chloe, its authorized distributors, and unrelated third parties via the Internet. Over the course of the past ten years, visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Chloe's overall marketing and consumer education efforts. Thus, Chloe expends significant monetary resources on Internet marketing and consumer education, including search engine optimization ("SEO") strategies. Those strategies allow Chloe and its authorized retailers to fairly and legitimately educate consumers about the value associated with the CHLOE Mark and the goods sold thereunder.

Panerai's Trademark Rights

40. Panerai is the owner of the trademarks identified on Schedule "E" hereto (collectively, the "PANERAI Marks"), which are valid and registered on the Principal Register of the United States Patent and Trademark Office. The PANERAI Marks are used in conjunction with the manufacture and distribution of high quality goods in the categories identified in Schedule "E." True and correct copies of the Certificates of Registration for the PANERAI Marks are attached hereto as Composite Exhibit "4."

41. The PANERAI Marks have been used in interstate commerce to identify and distinguish Panerai's high quality goods for an extended period of time and serves as a symbol of Panerai's quality, reputation and goodwill.

42. Further, Panerai has expended substantial time, money and other resources developing, advertising and otherwise promoting the PANERAI Marks. The PANERAI Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

43. Panerai and related companies have extensively used, advertised and promoted the PANERAI Marks in the United States in connection with the sale of high quality luxury goods. As a result, the PANERAI Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as an identifier of high quality goods.

44. Panerai has carefully monitored and policed the use of the PANERAI Marks and has never assigned or licensed the PANERAI Marks to any Defendant in this matter.

45. Genuine goods using the PANERAI Marks are widely legitimately advertised and promoted by Panerai, its authorized distributors, and unrelated third parties via the Internet. Over the course of the past ten years, visibility on the Internet, particularly via Internet search

engines such as Google, Yahoo!, and Bing has become increasingly important to Panerai's overall marketing and consumer education efforts. Thus, Panerai expends significant monetary resources on Internet marketing and consumer education, including search engine optimization ("SEO") strategies. Those strategies allow Panerai and its authorized retailers to fairly and legitimately educate consumers about the value associated with the PANERAI Marks and the goods sold thereunder.

Richemont's Trademark Rights

46. Richemont is the owner of all rights, title, and interest in the IWC, Baume & Mercier, and Vacheron Constantin trademarks identified on Schedule "F" hereto, which are valid and registered on the Principal Register of the United States Patent and Trademark Office (the "IWC Marks", "BAUME & MERCIER Marks", and "VACHERON CONSTANTIN Marks", respectively).

47. The IWC Marks are used in conjunction with the manufacture and distribution of high quality goods in the categories identified in Schedule "F-1." True and correct copies of the Certificates of Registration for the IWC Marks are attached hereto as Composite Exhibit "5."

48. The IWC Marks have been used in interstate commerce to identify and distinguish IWC's high quality goods for an extended period of time and serves as a symbol of IWC's quality, reputation and goodwill.

49. Further, IWC has expended substantial time, money and other resources developing, advertising and otherwise promoting the IWC Marks. The IWC Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

50. IWC has extensively used, advertised and promoted the IWC Marks in the United States in connection with the sale of high quality luxury goods. As a result, the IWC Marks are

among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as an identifier of high quality goods.

51. IWC has carefully monitored and policed the use of the IWC Marks and has never assigned or licensed the IWC Marks to any Defendant in this matter.

52. Genuine goods using the IWC Marks are widely legitimately advertised and promoted by IWC, its authorized distributors, and unrelated third parties via the Internet. Over the course of the past ten years, visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to IWC's overall marketing and consumer education efforts. Thus, IWC expends significant monetary resources on Internet marketing and consumer education, including search engine optimization ("SEO") strategies. Those strategies allow IWC and its authorized retailers to fairly and legitimately educate consumers about the value associated with the IWC Marks and the goods sold thereunder.

53. The BAUME & MERCIER Marks are used in conjunction with the manufacture and distribution of high quality goods in the categories identified in Schedule "F-2." True and correct copies of the Certificates of Registration for the BAUME & MERCIER Marks are attached hereto as Composite Exhibit "6."

54. The BAUME & MERCIER Marks have been used in interstate commerce to identify and distinguish Baume & Mercier's high quality goods for an extended period of time and serves as a symbol of Baume & Mercier's quality, reputation and goodwill.

55. Further, Baume & Mercier has expended substantial time, money and other resources developing, advertising and otherwise promoting the BAUME & MERCIER Marks.

The BAUME & MERCIER Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

56. Baume & Mercier has extensively used, advertised and promoted the BAUME & MERCIER Marks in the United States in connection with the sale of high quality luxury goods. As a result, the BAUME & MERCIER Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as an identifier of high quality goods.

57. Baume & Mercier has carefully monitored and policed the use of the BAUME & MERCIER Marks and has never assigned or licensed the BAUME & MERCIER Marks to any Defendant in this matter.

58. Genuine goods using the BAUME & MERCIER Marks are widely legitimately advertised and promoted by Baume & Mercier, its authorized distributors, and unrelated third parties via the Internet. Over the course of the past ten years, visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Baume & Mercier's overall marketing and consumer education efforts. Thus, Baume & Mercier expends significant monetary resources on Internet marketing and consumer education, including search engine optimization ("SEO") strategies. Those strategies allow Baume & Mercier and its authorized retailers to fairly and legitimately educate consumers about the value associated with the BAUME & MERCIER Marks and the goods sold thereunder.

59. The VACHERON CONSTANTIN Marks are used in conjunction with the manufacture and distribution of high quality goods in the categories identified in Schedule "F-3." True and correct copies of the Certificates of Registration for the VACHERON CONSTANTIN Marks are attached hereto as Composite Exhibit "7."

60. The VACHERON CONSTANTIN Marks have been used in interstate commerce to identify and distinguish Vacheron Constantin's high quality goods for an extended period of time and serves as a symbol of Vacheron Constantin's quality, reputation and goodwill.

61. Further, Vacheron Constantin has expended substantial time, money and other resources developing, advertising and otherwise promoting the VACHERON CONSTANTIN Marks. The VACHERON CONSTANTIN Marks qualify as famous marks as that term is used in 15 U.S.C. §1125(c)(1).

62. Vacheron Constantin has extensively used, advertised and promoted the VACHERON CONSTANTIN Marks in the United States in connection with the sale of high quality luxury goods. As a result, the VACHERON CONSTANTIN Marks are among the most widely recognized trademarks in the United States, and the trademarks have achieved secondary meaning as an identifier of high quality goods.

63. Vacheron Constantin has carefully monitored and policed the use of the VACHERON CONSTANTIN Marks and has never assigned or licensed the VACHERON CONSTANTIN Marks to any Defendant in this matter.

64. Genuine goods using the VACHERON CONSTANTIN Marks are widely legitimately advertised and promoted by Vacheron Constantin, its authorized distributors, and unrelated third parties via the Internet. Over the course of the past ten years, visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Vacheron Constantin's overall marketing and consumer education efforts. Thus, Vacheron Constantin expends significant monetary resources on Internet marketing and consumer education, including search engine optimization ("SEO") strategies. Those strategies allow Vacheron Constantin and its authorized retailers to fairly and legitimately

educate consumers about the value associated with the VACHERON CONSTANTIN Marks and the goods sold thereunder.

Defendants' Infringing Activities

65. Upon information and belief, Defendants are promoting and advertising, distributing, selling and/or offering for sale goods in interstate commerce using counterfeit and infringing trademarks that are exact copies of the CARTIER Marks, MONTBLANC Marks, CHLOE Mark, PANERAI Marks, IWC Marks, BAUME & MERCIER Marks, and/or VACHERON CONSTANTIN Marks (the "Counterfeit Goods") through the fully interactive commercial Internet websites operating under the Subject Domain Names. True and correct copies of the web pages reflecting samples of the Internet websites operating under the Subject Domain Names are attached hereto as Composite Exhibit "8." Specifically, upon information and belief, Defendants are using identical copies of the CARTIER Marks, MONTBLANC Marks, CHLOE Mark, PANERAI Marks, IWC Marks, BAUME & MERCIER Marks, and/or VACHERON CONSTANTIN Marks (collectively, "Plaintiffs' Marks") for different quality goods. Plaintiffs have used their respective Marks extensively and continuously before Defendants began offering counterfeit and confusingly similar imitations of Plaintiffs' goods.

66. Upon information and belief, Defendants' Counterfeit Goods are of a quality substantially different than that of Plaintiffs' respective, genuine goods. Defendants, upon information and belief, are actively using, promoting and otherwise advertising, distributing, selling and/or offering for sale substantial quantities of their Counterfeit Goods with the knowledge and intent that such goods will be mistaken for the genuine quality goods offered for sale by Plaintiffs despite Defendants' knowledge that they are without authority to use Plaintiffs' Marks. The net effect of Defendants' actions will cause confusion of consumers at the time of

initial interest, sale, and in the post-sale setting, who will believe Defendants' Counterfeit Goods are genuine goods originating from, associated with, and approved by Plaintiffs.

67. Defendants advertise their Counterfeit Goods for sale to the consuming public via at least their websites operating under the Subject Domain Names. In so advertising these goods, Defendants improperly and unlawfully use Plaintiffs' Marks without Plaintiffs' permission. Indeed, Defendants herein misappropriated Plaintiffs' advertising ideas and methods of doing business with regard to the advertisement and sale of Plaintiffs' respective, genuine goods. Upon information and belief, the misappropriation of Plaintiffs' advertising ideas in the form of Plaintiffs' Marks is, in part, the proximate cause of harm to Plaintiffs.

68. As part of their overall infringement and counterfeiting scheme, Defendants are, upon information and belief, all concurrently employing substantially similar, and often times coordinated, paid advertising and SEO strategies based, in large measure, upon an illegal use of counterfeits and infringements of Plaintiffs' Marks. Specifically, Defendants are using counterfeits of Plaintiffs' respective famous names and Plaintiffs' Marks in order to make their websites selling illegal goods appear more relevant and attractive to search engines across an array of search terms. By their actions, Defendants have created an illegal marketplace operating in parallel to the legitimate marketplace for Plaintiffs' respective genuine goods. Defendants are causing concurrent and indivisible harm to Plaintiffs and the consuming public by (i) depriving Plaintiffs of their right to fairly compete for space within search engine results and reducing the visibility of Plaintiffs' genuine goods on the World Wide Web, (ii) causing an overall degradation of the value of the goodwill associated with Plaintiffs' Marks, (iii) increasing Plaintiffs' overall cost to market their goods and educate consumers about their brands via the Internet, and (iv) maintaining an illegal marketplace enterprise which perpetuates the ability of

Defendants and future entrants to that marketplace to confuse consumers and harm Plaintiffs with impunity.

69. Upon information and belief, Defendants are concurrently conducting and targeting their counterfeiting and infringing activities toward consumers and causing harm within this district and elsewhere throughout the United States. As a result, Defendants are defrauding Plaintiffs and the consuming public for Defendants' own benefit.

70. Upon information and belief, at all times relevant hereto, Defendants in this action had full knowledge of Plaintiffs' respective ownership of Plaintiffs' Marks, including their respective, exclusive rights to use and license such intellectual property and the goodwill associated therewith.

71. Defendants' use of Plaintiffs' Marks, including the promotion and advertisement, reproduction, distribution, sale and offering for sale of their Counterfeit Goods, is without Plaintiffs' consent or authorization.

72. Defendants are engaging in the above-described illegal counterfeiting and infringing activities knowingly and intentionally or with reckless disregard or willful blindness to Plaintiffs' rights for the purpose of trading on Plaintiffs' respective goodwill and reputations. If Defendants' intentional counterfeiting and infringing activities are not preliminarily and permanently enjoined by this Court, Plaintiffs and the consuming public will continue to be harmed.

73. Defendants' above identified infringing activities are likely to cause confusion, deception and mistake in the minds of consumers, the public, and the trade before, during, and after the time of purchase. Moreover, Defendants' wrongful conduct is likely to create a false impression and deceive customers, the public, and the trade into believing there is a connection

or association between Plaintiffs' respective genuine goods and Defendants' Counterfeit Goods, which there is not.

74. Further, upon information and belief, some Defendants have registered their respective Subject Domain Names, using marks that are nearly identical and/or confusingly similar to at least one of Plaintiffs' Marks, (collectively the "Cybersquatted Subject Domain Names").

75. Defendants do not have, nor have they ever had, the right or authority to use Plaintiffs' Marks. Further, Plaintiffs' Marks have never been assigned or licensed to be used on any of the websites operating under the Cybersquatted Subject Domain Names.

76. Upon information and belief, Defendants have provided false and/or misleading contact information when applying for the registration of the Cybersquatted Subject Domain Names, or have intentionally failed to maintain accurate contact information with respect to the registration of the Cybersquatted Subject Domain Names.

77. Upon information and belief, Defendants have never used any of the Cybersquatted Subject Domain Names in connection with a bona fide offering of goods or services.

78. Upon information and belief, Defendants have not made any bona fide non-commercial or fair use of Plaintiffs' Marks on a website accessible under any of the Cybersquatted Subject Domain Names.

79. Upon information and belief, Defendants have intentionally incorporated Plaintiffs' respective Marks in their Cybersquatted Subject Domain Names to divert consumers looking for Plaintiffs' respective Internet websites to their own Internet websites for commercial gain.

80. Given the visibility of Defendants' various websites and the similarity of their actions, including their SEO activities, it is clear Defendants are either related or, at a minimum, cannot help but know of each other's existence and the damage likely to be caused to Plaintiffs as a result of Defendants' concurrent actions.

81. Although some Defendants may be acting independently, they may properly be deemed to be acting in concert because they are combining the force of their actions to multiply the harm caused to Plaintiffs.

82. Plaintiffs have no adequate remedy at law.

83. Plaintiffs are suffering irreparable and indivisible injury and have suffered substantial damages as a result of Defendants' unauthorized and wrongful use of Plaintiffs' Marks. If Defendants' counterfeiting, infringing, cybersquatting, and unfairly competitive activities, and their illegal marketplace enterprise are not preliminarily and permanently enjoined by this Court, Plaintiffs and the consuming public will continue to be harmed.

84. The harm and damage sustained by Plaintiffs have been directly and proximately caused by Defendants' wrongful reproduction, use, advertisement, promotion, offers to sell, and sale of their Counterfeit Goods and by the creation, maintenance and very existence of Defendants' illegal marketplace enterprise.

COUNT I - TRADEMARK COUNTERFEITING AND INFRINGEMENT
PURSUANT TO § 32 OF THE LANHAM ACT (15 U.S.C. § 1114)

85. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 84 above.

86. This is an action for trademark counterfeiting and infringement against Defendants based on their use of counterfeit and confusingly similar imitations of Plaintiffs'

Marks in commerce in connection with the promotion, advertisement, distribution, offering for sale, and sale of the Counterfeit Goods.

87. Specifically, Defendants are promoting and otherwise advertising, selling, offering for sale, and distributing products using counterfeits and/or infringements of one or more of Plaintiffs' Marks. Defendants are continuously infringing and inducing others to infringe Plaintiffs' Marks by using them to advertise, promote, offer to sell, and/or sell goods using Plaintiff's Marks.

88. Defendants' indivisible and concurrent counterfeiting and infringing activities are likely to cause and actually are causing confusion, mistake and deception among members of the trade and the general consuming public as to the origin and quality of Defendants' Counterfeit Goods.

89. Defendants' unlawful actions have individually and jointly caused and are continuing to cause unquantifiable damage and irreparable harm to Plaintiffs and are unjustly enriching Defendants at Plaintiffs' expense.

90. Defendants' above-described illegal actions constitute counterfeiting and infringement of Plaintiffs' Marks in violation of Plaintiffs' respective rights under § 32 of the Lanham Act, 15 U.S.C. § 1114.

91. Plaintiffs have each suffered and will continue to suffer irreparable injury due to Defendants' above described activities if Defendants are not preliminarily and permanently enjoined.

COUNT II - FALSE DESIGNATION OF ORIGIN
PURSUANT TO § 43(a) OF THE LANHAM ACT (15 U.S.C. § 1125(a))

92. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 84 above.

93. Defendants' Counterfeit Goods using, offered for sale, and sold under copies of Plaintiffs' Marks have been widely advertised and offered for sale throughout the United States.

94. Defendants' Counterfeit Goods using, offered for sale and sold under copies of Plaintiffs' Marks are virtually identical in appearance to Plaintiffs' respective, genuine goods. However, Defendants' Counterfeit Goods are different in quality. Accordingly, Defendants' activities are likely to cause confusion in the trade and among the general public as to at least the origin or sponsorship of their Counterfeit Goods.

95. Defendants, upon information and belief, have used in connection with their advertisement, offers for sale, and sale of the Counterfeit Goods, false designations of origin and false descriptions and representations, including words or other symbols and trade dress which tend to falsely describe or represent such goods and have caused such goods to enter into commerce with full knowledge of the falsity of such designations of origin and such descriptions and representations, all to Plaintiffs' detriment.

96. Defendants have authorized infringing uses of Plaintiffs' Marks in Defendants' advertisement and promotion of their counterfeit and infringing branded goods. Defendants have also misrepresented to members of the consuming public that the Counterfeit Goods being advertised and sold by them are genuine, non-infringing goods.

97. Additionally, Defendants are using counterfeits and infringements of Plaintiffs' Marks in order to unfairly compete with Plaintiffs and others for space within search engine organic results, thereby jointly depriving Plaintiffs of a valuable marketing and educational tool

which would otherwise be available to Plaintiffs and reducing the visibility of Plaintiffs' genuine goods on the World Wide Web.

98. Defendants' above-described actions are in violation of Section 43(a) of the Lanham Act, 15 U.S.C. §1125(a).

99. Plaintiffs have no adequate remedy at law, and have each sustained indivisible injury and damage caused by Defendants' concurrent conduct, and absent an entry of an injunction by this Court, each Plaintiff will continue to suffer irreparable injury to their respective goodwill and business reputations, as well as monetary damages.

**COUNT III - CLAIM FOR RELIEF FOR CYBERSQUATTING
PURSUANT TO §43(d) OF THE LANHAM ACT (15 U.S.C. §1125(d))**

(Plaintiffs Richemont International SA, Cartier International A.G.,
Montblanc-Simplo GMBH, and Officine Panerai A.G. only)

100. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 84 above.

101. Upon information and belief, Defendants have acted with the bad faith intent to profit from the CARTIER Marks, MONTBLANC Marks, PANERAI Marks, and IWC Marks and the goodwill associated with the Marks by registering and using the Cybersquatted Subject Domain Names.

102. The CARTIER Marks, MONTBLANC Marks, PANERAI Marks, and IWC Marks were distinctive and famous at the time Defendants registered the Cybersquatted Subject Domain Names.

103. Defendants have no intellectual property rights in or to the CARTIER Marks, MONTBLANC Marks, PANERAI Marks, or IWC Marks.

104. The Cybersquatted Subject Domain Names are identical to, confusingly similar to or dilutive of at least one of the CARTIER Marks, MONTBLANC Marks, PANERAI Marks, or IWC Marks.

105. Defendants' conduct is done with knowledge and constitutes a willful violation of Plaintiffs' rights in their respective Marks. At a minimum, Defendants' conduct constitutes reckless disregard for and willful blindness to Plaintiffs' respective rights.

106. Defendants' actions constitute cybersquatting in violation of §43(d) of the Lanham Act, 15 U.S.C. §1125(d).

107. Plaintiffs have no adequate remedy at law and have suffered and will continue to suffer irreparable injury and harm due to the above described activities of Defendants if Defendants are not preliminarily and permanently enjoined.

COUNT IV - COMMON LAW UNFAIR COMPETITION

108. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 84 above.

109. This is an action against Defendants based on their (i) promotion, advertisement, distribution, sale, and/or offering for sale of goods using marks that are virtually identical, both visually and phonetically, to Plaintiffs' Marks and (ii) creation and maintenance of an illegal, ongoing marketplace enterprise operating in parallel to the legitimate marketplace in which Plaintiffs sell their genuine goods, in violation of Florida's common law of unfair competition.

110. Specifically, Defendants are promoting and otherwise advertising, selling, offering for sale, and distributing goods using counterfeits and infringements of Plaintiffs' Marks. Defendants are also using counterfeits and infringements of Plaintiffs' Marks to unfairly

compete with Plaintiffs and others for (i) space in search engine results across an array of search terms and (ii) visibility on the World Wide Web.

111. Defendants' infringing activities are likely to cause and actually are causing confusion, mistake, and deception among members of the trade and the general consuming public as to the origin and quality of Defendants' products by their use of Plaintiffs' Marks.

112. Plaintiffs have no adequate remedy at law and are suffering irreparable injury as a result of Defendants' actions.

COUNT V - COMMON LAW TRADEMARK INFRINGEMENT

113. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 84 above.

114. This is an action for common law trademark infringement against Defendants based on their promotion, advertisement, offering for sale, and sale of their Counterfeit Goods using Plaintiffs' Marks. Plaintiffs are the owners of all common law rights in and to Plaintiffs' Marks.

115. Specifically, Defendants, upon information and belief, are promoting and otherwise advertising, distributing, offering for sale, and selling goods using infringements of Plaintiffs' Marks.

116. Defendants' infringing activities are likely to cause and actually are causing confusion, mistake and deception among members of the trade and the general consuming public as to the origin and quality of Defendants' Counterfeit Goods using Plaintiffs' Marks.

117. Plaintiffs have no adequate remedy at law and are suffering damages and irreparable injury as a result of Defendants' actions

PRAYER FOR RELIEF

118. WHEREFORE, Plaintiffs demand judgment on all Counts of this Complaint and an award of equitable relief and monetary relief, jointly and severally, against Defendants as follows:

a. Entry of temporary, preliminary and permanent injunctions pursuant to 15 U.S.C. § 1116 and Federal Rule of Civil Procedure 65 enjoining Defendants, their agents, representatives, servants, employees, and all those acting in concert or participation therewith, from manufacturing or causing to be manufactured, importing, advertising or promoting, distributing, selling or offering to sell their Counterfeit Goods; from infringing, counterfeiting, or diluting Plaintiffs' Marks; from using Plaintiffs' Marks, or any mark or trade dress similar thereto, in connection with the sale of any unauthorized goods; from using any logo, trade name or trademark or trade dress that may be calculated to falsely advertise the services or goods of Defendants as being sponsored by, authorized by, endorsed by, or in any way associated with Plaintiffs; from falsely representing themselves as being connected with Plaintiffs, through sponsorship or association, or engaging in any act that is likely to falsely cause members of the trade and/or of the purchasing public to believe any goods or services of Defendants are in any way endorsed by, approved by, and/or associated with Plaintiffs; from using any reproduction, counterfeit, infringement, copy, or colorable imitation of Plaintiffs' Marks in connection with the publicity, promotion, sale, or advertising of any goods sold by Defendants; from 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 Defendants' goods as being those of Plaintiffs, or in any way endorsed by Plaintiffs and from offering such goods in commerce; from engaging in search engine optimization strategies using

colorable imitations of Plaintiffs' respective name or trademarks; and from otherwise unfairly competing with Plaintiffs.

b. Entry of temporary, preliminary, and permanent injunctions enjoining Defendants from creating, maintaining, operating, joining, and participating in their World Wide Web based illegal marketplace for the sale and distribution of non-genuine goods using counterfeits of Plaintiffs' Marks.

c. Entry of an order pursuant to 28 U.S.C §1651(a), The All Writs Act that, upon Plaintiffs' request, the top level domain (TLD) Registry for each of the Subject Domain Names or their administrators, including backend registry operators or administrators, place the Subject Domain Names on Registry Hold status for the remainder of the registration period for any such domain name, thus removing them from the TLD zone files which link the Subject Domain Names to the IP addresses where the associated websites are hosted.

d. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act canceling for the life of the current registration or, at Plaintiffs' election, transferring the Subject Domain Names and any other domain names used by Defendants to engage in their counterfeiting of Plaintiffs' Marks at issue to Plaintiffs' control so they may no longer be used for illegal purposes.

e. Entry of an order requiring Defendants to account to and pay Plaintiffs for all profits and damages resulting from Defendants' trademark counterfeiting and infringing activities and that the award to Plaintiffs be trebled, as provided for under 15 U.S.C. §1117, or, at Plaintiffs' election with respect to Count I, that Plaintiffs be awarded statutory damages from each Defendant in the amount of two million dollars (\$2,000,000.00) per each counterfeit trademark used and product sold, as provided by 15 U.S.C. §1117(c)(2) of the Lanham Act.

f. Entry of an order requiring the relevant Defendants to account to and pay Plaintiffs for all profits and damages resulting from those Defendants' cybersquatting activities and that the award to Plaintiffs be trebled, as provided for under 15 U.S.C. §1117, or, at Plaintiffs' election with respect to Count III, that Plaintiffs be awarded statutory damages from the relevant Defendants in the amount of one hundred thousand dollars (\$100,000.00) per cybersquatted domain name used as provided by 15 U.S.C. §1117(d) of the Lanham Act.

g. Entry of an award of Plaintiffs' costs and reasonable attorneys' fees and investigative fees associated with bringing this action.

h. Entry of an award of pre-judgment interest on the judgment amount.

i. Entry of an order for any further relief as the Court may deem just and proper.

DATED: November 3, 2016.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: s:/Stephen M. Gaffigan/

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Attorneys for Plaintiffs

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

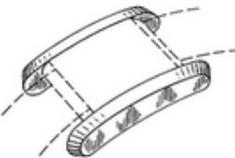
1	montblancpensmylove.top
1	montblancpensvip.com
1	montblancpenswholesaleprice.top
1	nwatches.top
1	offerwatches.top
1	onlineiwcwatches.top
1	onlinemontblancpensforsale.top
1	onlinewatches.top
1	onlinewatches11.top
1	outletwatches.top
1	outletwatchesforyou.top
1	paneraiwatchcheapprice.top
1	paneraiwatches216.top
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	worldfamousiwcwatches.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
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	watchreplicalove.top
8	watchstore.xyz
9	cartierlovebraceletjewelry.com
10	climatizzatorecondizionatori.com
11	deals4uwatches.com
12	globalwholesaleshop.net
13	hqrluxury.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

SCHEDULE "B"
PLAINTIFF CARTIER INTERNATIONAL A.G.'S
FEDERALLY REGISTERED TRADEMARKS

Registered Trademark	Registration Number	Registration Date	Classes/Goods
	0,411,975	February 13, 1945	IC 014 - Watches and Clocks and Wrist Watches with Wrist Straps and Bracelets Attached for Securing the Same on the Wrist of the Wearer, and Traveling Clocks and Watches with Covers of Leather, Fabric and the Like for Protecting Them While Traveling
CARTIER	0,759,201	October 29, 1963	IC 014 - Watches and Clocks
	1,372,423	November 26, 1985	IC 014 - Bracelets
	2,322,769	February 29, 2000	IC 014 - Watches
	3,282,847	August 21, 2007	IC 014 - Horologic and chronometric instruments, namely, watches
	4,178,047	July 24, 2012	IC 014 - Jewelry and watches
	4,483,522	February 18, 2014	IC 014 - Watches

SCHEDULE "C"
PLAINTIFF MONTBLANC-SIMPLO GMBH'S
FEDERALLY REGISTERED TRADEMARKS

Registered Trademark	Registration Number	Registration Date	Classes/Goods
	0,839,016	November 21, 1967	IC 002 - Fountain pen ink IC 016 - Fountain pens, cases for fountain pens, ball point pens, ball point cartridges, mechanical pencils, lead for mechanical pencils, desk stands for pens
	1,878,584	February 14, 1995	IC 014 - Jewelry, watches and timepieces IC 018 - Purses, handbags, small leather articles and accessories, namely wallets and billfolds, and luggage
MONTBLANC	1,884,842	March 21, 1995	IC 014 - Jewelry, watches and timepieces IC 018 - Purses, handbags, small leather articles and accessories, namely wallets and billfolds, and luggage
	4,669,133	January 13, 2015	IC 003 - Soaps; perfumery; essential oils; cosmetic preparations for body and beauty care in class 003. IC 009 - Eyeglasses, sunglasses; eyeglass frames and cases; magnifying glasses; computer and tablets carrying cases and bags; holders and cases for telephones, portable telephones and smartphones; accessories for portable telephones, smartphones and tablets, namely, cases, bags;

		<p>data recording and storage media device and instruments, namely, blank USB flash drive; graduated rulers</p> <p>IC 014 - Jewelry; precious stones; precious metals and their alloys; cufflinks; tie clips; rings; bracelets; earrings; necklaces; brooches; key rings of precious metal; jewelry cases; boxes of precious metals; horological and chronometric instruments; watches; chronometers; clocks; small clocks; watch cases; watch bands; watch bracelets; key rings, trinkets, or fobs of precious metal</p> <p>IC 016 - Stationery; articles of paper or cardboard, namely, boxes, bags, envelopes and pouches for packaging; wrapping paper; writing instruments; pouches for writing instruments; cases for writing instruments; inks and ink refills for writing instruments; desk sets; writing books; calendars, note books, card and document files, announcement cards; writing paper, envelopes, index cards; business cards; writing pads; writing instrument holders; paperweights; diaries, cover for diaries, replacement papers for diaries; inkwells; check book holders, passport holders; document holders and cases; photo albums; bookends; money clips; writing cases for writing instruments</p> <p>IC 018 - Handbags, travelling bags, rucksacks, garment bags for travel, traveling sets comprised of luggage, suitcases, bags for</p>
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			sports, wheeled bags, wallets, purses, name cards cases, briefcases, attaché cases, key cases of leather or imitation leather; travelling trunks; unfitted vanity cases; evening purses; leather straps; boxes of leather or leather board, trunks and suitcases; credit card holder
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SCHEDULE "D"
PLAINTIFF CHLOE S.A.S.'S
FEDERALLY REGISTERED TRADEMARK

Registered Trademark	Registration Number	Registration Date	Classes/Goods
CHLOE	1,491,810	June 14, 1988	IC 003 - Perfume, Toilet Water, Cologne, Body Lotion, Body Cream, Personal Deodorant, Beauty Or Bath Soap IC 018 - Handbags, Purses IC 025 - Bathrobes, Bathing Suits, Coats, Dresses, Hats, Jackets, Shirts, Blouses, Trousers, Skirts, Scarves, Shoes

SCHEDULE "E"
PLAINTIFF OFFICINE PANERAI A.G.'S
FEDERALLY REGISTERED TRADEMARKS

Registered Trademark	Registration Number	Registration Date	Classes/Goods
PANERAI	2,340,290	April 11, 2000	IC 014 - Chronometers, watches
RADIOMIR	2,418,830	January 9, 2001	IC 014 - Boxes and cases of precious metal for watches; jewellery and precious gem stones; chronometers; watches and clocks.
LUMINOR	2,516,018	December 11, 2001	IC 014 - Chronometers, watches and clocks
OFFICINE PANERAI	4,009,035	August 9, 2011	IC 014 - Chronometers, watches and clocks; watch accessories, namely, watch bands, watch straps, watch bracelets and buckles for watch bands and watch straps; boxes and cases for watches. IC018 - Sport bags; holdalls for yachting equipment and apparel.] [IC025 - clothing, namely t-shirts, wind resistant jackets, jackets, vests, sweaters, polo shirts, long sleeve shirts, scarves; headwear, hats, caps.

SCHEDULE "F"
PLAINTIFF RICHEMONT INTERNATIONAL S.A.'S
FEDERALLY REGISTERED TRADEMARKS

(1) IWC Schaffhausen Trademarks

Trademark	Registration Number	Registration Date	Class / Goods
IWC	1,205,403	August 17, 1982	IC 014 - Watches
	4,270,382	January 8, 2013	<p>IC 014 - Cuff links, tie clips, rings, bracelets, earrings, necklaces, brooches, key rings made of precious metals, watches, chronometers, clocks; straps for wristwatches, boxes of precious metal for watches and jewelry, alarm clocks; all the aforementioned goods from Switzerland</p> <p>IC 035 - Advertising services; business management; business administration; dissemination of advertising matter; procurement, namely, purchasing watches and chronometers and components thereof for others; providing online and retail store services in the field of watches, chronometers, and luxury goods; commercial information and advice for consumers; demonstration of goods; direct mail advertising services; auctioneering; organization of exhibitions for commercial or advertising purposes; organization of trade fairs for commercial or advertising purposes; sales promotion for others; publication of publicity texts; on-line advertising on a computer network; public relations; news clipping services;</p>

			<p>the bringing together, for the benefit of others, of a variety of goods enabling customers to conveniently view and purchase those goods from a store in the field of watches, chronometers, and luxury goods;</p> <p>the bringing together, for the benefit of others, of a variety of goods enabling customers to conveniently view and purchase those goods by E-mail and telecommunications in the field of watches, chronometers, and luxury goods;</p> <p>the bringing together, for the benefit of others, of a variety of goods enabling customers to conveniently view and purchase those goods from an Internet site in the field of watches, chronometers, and luxury goods</p>
IWC	4,322,600	April 23, 2013	<p>IC 003 - Soap; perfumery, essential oils, cosmetics, hair lotions</p> <p>IC 008 - Flatware; knives, forks, and spoons</p> <p>IC 009 - Spectacles, sunglasses, spectacle cases; measuring instruments, namely, barometers, hygrometers, and thermometers; divers' masks; apparatus for games adapted for use with an external display screen or monitor</p> <p>IC 012 - bicycles</p> <p>IC 014 - Watches, chronometers, clocks, watch bands, boxes of precious metal for watches</p> <p>IC 016 - Books and magazines in the field of watches and luxury goods; agendas</p> <p>IC 018 - Bags, namely, travel bags, briefcases, and handbags; traveling sets comprised of suitcases and</p>

			<p>travel bags; wallets; card cases for business cards and credit cards</p> <p>IC 025 - Clothing, namely, shirts, tops, scarves, neckties, and hats</p> <p>IC 028 - Games, namely, board games, manipulative games, machines for games of chance; gymnastic apparatus; sporting articles, namely, equestrian polo mallets and balls, and golf clubs, golf balls, and golf accessories, namely, golf accessory pouches, golf bag covers, golf bag pegs, golf bag tags, golf bags with and without wheels, golf ball markers, golf ball retrievers, golf ball sleeves, golf club bags, golf club covers, golf club grips, golf club heads, golf club holders for use on a driving range or golf course, golf club inserts, golf club shafts, golf flags, golf gloves, golf irons, golf putter covers, golf putters, golf tees, golf towel clips for attachment to golf bags; scale-model vehicles, swim fins, remote control toy vehicles; toys, namely, plush toys, mechanical toys, dolls, and toy building blocks</p> <p>IC 034 - Tobacco, cigarettes, cigarillos, cigars; lighters for smokers; smokers' articles, namely, cigarette holders, cases and lighters all not made of precious metal, ashtrays, and pipes</p> <p>IC 035 - Advertising services; business management; business administration; dissemination of advertising matter; procurement, namely, purchasing watches and chronometers and components thereof for others; providing online</p>
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			<p>and retail store services in the field of watches, chronometers, and luxury goods; commercial information and advice for consumers; demonstration of goods; direct mail advertising services; auctioneering; organization of exhibitions for commercial or advertising purposes; organization of trade fairs for commercial or advertising purposes; sales promotion for others; publication of publicity texts; on-line advertising on a computer network; public relations; news clipping services; the bringing together, for the benefit of others, of a variety of goods enabling customers to conveniently view and purchase those goods from a store in the field of watches, chronometers, and luxury goods; the bringing together, for the benefit of others, of a variety of goods enabling customers to conveniently view and purchase those goods by E-mail and telecommunications in the field of watches, chronometers, and luxury goods; the bringing together, for the benefit of others, of a variety of goods enabling customers to conveniently view and purchase those goods from an Internet site in the field of watches, chronometers, and luxury goods</p>
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(2) Baume & Mercier Schaffhausen Trademarks

Trademark	Registration Number	Registration Date	Classes/Goods
	1,081,643	January 10, 1978	IC 014 - Watches, watch cases and watch movements
BAUME & MERCIER GENEVE	3,371,339	January 22, 2008	IC 014 - Watches, Watch Cases

(3) Vacheron Constantin Trademarks

Registered Trademark	Registration Number	Registration Date	Classes/Goods
	3,114,414	July 11, 2006	IC 014 - Cuff links; watches, chronometers, clocks, watchstraps, cases of precious metal for watches and jewellery
	4,564,316	July 8, 2014	IC 014 - Watches and chronometers