

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

ADIDAS AG, ADIDAS INTERNATIONAL MARKETING B.V.,
ADIDAS AMERICA, INC., REEBOK INTERNATIONAL LIMITED,
and REEBOK INTERNATIONAL LTD.,

Plaintiffs,

vs.

ADIDASCO.COM, ADADASSUPERSTAR.COM,
ADIDASAUSTRALIA.COM, ADIDASCH.ORG,
ADIDASDENMARK.ORG, ADIDASEMPORTUGAL.ORG,
ADIDASEPOOD.COM a/k/a TERREXEESTI.COM,
ADIDASFALCONGREECE.COM, ADIDASGREECE.ORG,
ADIDASGREECESHOES.COM, ADIDASHRVATSKAONLINE.COM,
ADIDASHU.TOP, ADIDASINIDA.COM, ADIDASKENGAT.FI,
ADIDASMIX.COM, ADIDASNMDBOOST.COM,
ADIDASNMDCHUKKA.COM, ADIDASNMDSUOMI.ORG,
ADIDASORIGINALSHOESUK.COM, ADIDASOUTLETNORGE.COM,
ADIDASR.TOP, ADIDASSHOESNZ.COM,
ADIDASSHOPROMANIA.NET, ADIDASSNEAKERSAUSTRALIA.COM,
ADIDASSUPERSTARGR.TOP, ADIDASSVERIGEBUTIK.COM,
ADIDAS-TENISKY.COM, ADIDASTR.COM, ADIDAS-UK.COM,
ADIDASULTRABOOSTALE.FI, ADIDAS-YEEZY.ORG, ADIDAS-
YEEZY-BOOST.COM, ADIDASYEEZYBOOSTONLINESTORE.COM,
ADIDASYEEZYONLINE.COM a/k/a YEEZY350S.COM a/k/a
YEEZY350V2S.COM a/k/a YEEZYSADIDAS.US,
ADIDASYEEZYONLINESTORE.US, ADIDASYEEZYSSUPPLY.COM,
ADIDASYEEZYUSA.COM, ADIDASYEEZYBUYSHOESONLINE.COM,
AUTHENTICADIDAS.COM, AUTHENTIC-BOOST.COM,
BESTADIDASSTORE.COM, BESTYEEZYBOOST.COM,
CAMISETASADIDAS.COM, NEGOZIOREEBOK.COM,
NEWBOOSTOUTLET.COM, REEBOK-ARGENTINA.COM,
REEBOKBUTIKSVERIGE.COM, REEBOKBUTYPOLSKA.COM,
REEBOKCLASSICINDIA.COM, REEBOKCLUBC85VINTAGE.COM,
REEBOKCZOUTLET.COM, REEBOKHUSHOP.COM, REEBOKIE.COM,
REEBOK-IRELAND.COM, REEBOKLEGACYLIFTERS.COM,
REEBOKNO.COM, REEBOKNZAUCKLAND.COM,
REEBOKOUTLETGREECE.COM, REEBOKOUTLETS.CC,
REEBOKPH.COM, REEBOKPORTUGALLOJAS.COM,
REEBOKSGSHOE.COM a/k/a REEBOK-SINGAPORE.COM,
REEBOKSINGAPORESALE.COM, REEBOKSKORRABATT.COM,
REEBOK-SOUTHAFRICA.COM, REEBOKSUOMIKENGAT.COM,
REEBOKVYPREDAJ.COM, SALEADIDASIT.COM,

SHOPREEBOKHRVATSKA.COM, SKOREEBOKDK.COM,
STANSMITHINDIRIM.COM, SUPERBOOSTPRO.COM,
TENISSTANSMITH.COM, TOPADIDASOUTLET.COM,
YEEZYBOOSTSTORES.COM, YEEZYSHOESBOOSTSHOP.COM,
YEEZYSSBOOSTS.COM, ZAPATILLASADIDASBALONCESTO.COM,
2020JERSEYSHOP.COM, 2020SOCCERSHOES.COM,
ADYEEZYESJOY.COM, BLACKBEARCAVINSINC.COM,
CAMISETACADIZBARATAS.COM,
CAMISETAOSASUNABARATAS.COM,
CAMISETASDEFUTBOLREPLICAS.COM, CAMISETAS-DE-FUTBOL-
REPLICAS.COM, CAMISETASDEFUTBOLREPLICAS2019.COM,
CAMISETASDEFUTBOLREPLICAS2020.COM,
CAMISETASFUTBOLREPLICAS.COM, CAMISETASREPLICAS.COM,
CHEAPAIRMAXSHOES2SALE.COM a/k/a SHOXHOME.COM, CHEAP-
FOOTBALL.COM, CHEAPNFLJERSEYSBAND.COM a/k/a
HOTJERSEYSDEAL.COM, CHEAPSHOESNZ.COM,
CHEAPSHOESPRO.COM, CHEAPSHOESRUNNING.COM,
CHEAPSNEAKERSPRO.COM, CHEAPSNK.COM,
CHEAPSOCCKERKIT.COM, CHEAPSPOTRNZ.COM,
CHEAPUASNEAKERS.COM, CHEAPYEEZYES.COM,
CHEAPYEEZYSHOES.SHOP, DALRANNOCHCH.COM,
DISCOUNTSHOPJERSEYS.TOP, DOSOCCERJERSEY.NET,
ELEVENKICKS.COM, ES-FUTBOLREPLICA.COM, FAKEYEEZY.TO,
FEBSHOE.COM, FUTBOLREPLICA.COM,
GOEDKOPEVOETBALSHIRTS-REPLICA.COM,
HOLACAMISETASDEFUTBOLREPLICAS.COM,
HOLAFUTBOLREPLICA.COM, HOMESIDEFLORIST.COM,
HORSTLOEWEL.COM a/k/a HORSTLOEWEL.TOP, JERSEYGOAL.CO,
JERSEY-KINGDOM.CO, JERSEYS1ST.COM, JERSEYS21.COM,
MAGLIECALCIOREPLICA.COM, MAGLIECALCIOREPLICA2020.COM,
MAGLIECALCIOREPLICAS2020.COM, MINEJERSEYS.COM.CN a/k/a
VIPMJSHP.COM, N7-KITS.CO, ONLINEYEEZYS.COM,
ONLYEEZY.COM a/k/a ONLYEEZY.RU, OUTLETYEEZYSHOES.COM,
PASCHERYEEZY.COM, REPFASHIONS.CO,
REPLICASCAMISETASBARATAS2019.COM,
REPLICASCAMISETASDEFUTBOL2019.COM,
REPLICASCAMISOLASDEFUTEBOL.COM,
REPLICASDECAMISETAS2020.COM, REPLICASOCCERJERSEY.NET,
REPLICASOCCERJERSEYS.NET, REPLICAVOETBAL.COM,
REPLICAVOETBALSHIRTS.COM,
SALECHEAPSOCCERJERSEYS.COM, SCARPEITSALE.COM,
SNEAKERFACTORYSHOP.COM, SNEAKERSONLINE.CLUB,
SOCCERJERSEYSPECIAL.COM, SOLEOFFER.ORG,
SUPPLYEEZYS.US, TAKSITARIFE.COM a/k/a TAKSITARIFE.TOP,
TERREXCHEAP.FR, TUCSONFCA.COM, USSOCCERJERSEY.US,
VOETBALSHIRTGOEDKOPE.COM,

VOETBALSHIRTSREPLICA2019.COM, WARUNGSANGRAI.COM, WHOLESALE-CHEAPSHOES.NET, YEEZY350GREECE.COM, YEEZY350NORGE.COM, YEEZY350V2.US, YEEZYATOR.COM, YEEZYPBESTBUYSHOES.COM, YEEZY-BOOTS.ONLINE, YEEZYBSHOP.COM, YEEZYCHEAP4\$AL\$E.COM, YEEZYDAILY.NET, YEEZYFANS.COM, YEEZYGOGO.COM, YEEZYINER.COM, YEEZYIRSHOP.COM, YEEZYISTIC.COM, YEEZYISTORE.COM, YEEZYITALY.COM, YEEZYLLDER.COM, YEEZYLIC.COM, YEEZYM.COM, YEEZYNAC.COM, YEEZYOBUY.COM, YEEZYSHOESBEST.COM, YEEZYSHOPPINGSHOES.COM, YEEZYSHOPPINGSTORE.COM, YEEZYSLIDESHOP.COM, YEEZYSLIDESTIME.COM, YEEZYSOUTLET.COM, YEEZYUISH.COM, YEEZYUPSHOP.COM, YEEZYXSHOES.COM, and ZSWSE.COM, each an Individual, Business Entity, or Unincorporated Association,

Defendants.

COMPLAINT FOR INJUNCTIVE RELIEF AND DAMAGES

Plaintiffs, adidas AG, adidas International Marketing B.V., adidas America, Inc., Reebok International Limited, and Reebok International Ltd., (collectively “Plaintiffs”) hereby sue Defendants the Individuals, Business Entities, and Unincorporated Associations identified in the caption, which are set forth on Schedule “A” hereto (collectively “Defendants”). Defendants are promoting, selling, offering for sale and/or distributing goods within this district using counterfeits and confusingly similar imitations of Plaintiffs’ respective trademarks through at least the fully interactive commercial Internet websites operating under the domain names set forth on Schedule “A” hereto (the “Subject Domain Names”). In support of their claims, Plaintiffs allege as follows:

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), The All



Writs Act, 28 U.S.C. § 1651(a), and Florida's common law. 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, conduct business by registering and maintaining the Subject Domain Names within the United States, and direct business activities towards consumers throughout the United States, including within the State of Florida and this district through at least the fully interactive¹ commercial Internet websites operating under the Subject Domain Names. Alternatively, Defendants are subject to personal jurisdiction in this district pursuant to Federal Rule of Civil Procedure 4(k)(2) because (i) Defendants are not subject to jurisdiction in any state's court of general jurisdiction; and (ii) exercising jurisdiction is consistent with the United States Constitution and laws.



¹ Some Defendants use their Subject Domain Names to act as supporting domain names to direct traffic to their fully-interactive, commercial websites operating under other Subject Domain Names, from which consumers can complete purchases. Some of the supporting domain names, when accessed directly, appear to be blog style or non-operating websites; however, when visited from a search engine such as Google, visitors are redirected to the fully-interactive websites operating under other Subject Domain Names. Other supporting domain names either automatically redirect and forward to a fully-interactive, commercial Internet website operating under one of the Subject Domain Names or redirect a consumer to a fully-interactive, commercial Internet website operating under one of the Subject Domain Names upon clicking a product or link on the website. Additionally, at least Defendants 2 and 32 have their Subject Domain Names redirecting and forward to fully interactive, commercial websites operating under the subdomains, adidasoutlet.us.org and yeezy-adidas.us.com, respectively, to complete purchases. Accordingly, the web pages for the Subject Domain Names which operate as redirecting websites are included with the web pages to which those sites redirect, as shown in Composite Exhibit "3" hereto.




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

THE PLAINTIFFS

4. Plaintiff adidas AG (“adidas AG”) is a joint stock company organized and existing under the laws of the Federal Republic of Germany, having its office and principal place of business at Postach 1120, D-91072 Herzogenaurach, Federal Republic of Germany. adidas AG is currently, and for years has been, one of the world’s leading manufacturers of athletic footwear and apparel, including products bearing the distinctive **adidas**,  ,  , Three-Stripe Mark, THE BRAND WITH THE 3 STRIPES Mark, BOOST Mark, NMD Mark, SPLY-350 Mark, and SUPERSTAR Mark.

5. Plaintiff adidas International Marketing B.V. (“adidas International”) is a corporation organized and existing under the laws of Netherlands, having its principal place of business in the Netherlands. adidas International is wholly owned by adidas AG and its affiliates.

6. Plaintiff adidas America, Inc. (“adidas America”) is a corporation organized and existing under the laws of the State of Oregon, having its principal place of business at 5055 N. Greeley Avenue, Portland, Oregon, 97217. adidas America is wholly owned by adidas AG and its affiliates, and within this country adidas America is a licensed distributor of adidas-branded merchandise, including goods using the distinctive **adidas**,  ,  , Three-Stripe Mark, THE BRAND WITH THE 3 STRIPES Mark, BOOST Mark, NMD Mark, SPLY-350 Mark, and SUPERSTAR Mark. adidas AG, adidas International, and adidas America shall be referred to herein collectively as “adidas.”

7. Plaintiff Reebok International Limited (“Reebok International”) is a corporation organized and existing under the laws of England, having its principal place of business at 11/12 Pall Mall, London SW1 Y 5LU, England. Reebok International is wholly owned by adidas AG and its affiliates. Reebok International currently is, and for many years has been, one of the world's leading manufacturers of footwear and sportswear, including products using the distinctive , , , and Reebok Mark.

8. Plaintiff Reebok International Ltd. (“Reebok Ltd.”) is a corporation organized and existing under the laws of the Commonwealth of Massachusetts, having its principal place of business at 25 Dry Dock Ave., Boston, Massachusetts, 02210. Reebok Ltd. is wholly-owned by adidas AG and its affiliates. Reebok International and Reebok Ltd., and any predecessors or related entities, shall be collectively referred to herein as “Reebok.”

9. Plaintiffs’ goods are sold through various channels of trade within the State of Florida, including this district. Defendants, through the advertising, 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 United States, including the State of Florida and causing Plaintiffs irreparable harm within this jurisdiction.

10. Like many other famous trademark owners, 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’ trademarks for the twin purposes of (i) duping and confusing the consuming public and (ii) earning substantial profits.

11. To combat the indivisible harm caused by the combined actions of Defendants and others engaging in similar conduct, each year Plaintiffs expend significant monetary and

other resources in connection with trademark enforcement efforts, including legal fees, investigative fees, and support mechanisms for law enforcement, such as field training, guides and seminars. The exponential growth of counterfeiting over the Internet has created an environment that require companies, such as Plaintiffs, to expend significant time and money across a wide spectrum of efforts to protect both consumers and themselves from the confusion and erosion of the goodwill embodied in Plaintiffs' brands.

THE DEFENDANTS

12. Defendants operate through domain names registered with registrars in multiple countries, including the United States, and are comprised of individuals, business entities of unknown makeup, or unincorporated associations each of whom, upon information and belief, likely reside and/or operate in foreign jurisdictions or redistribute products from the same or similar sources in those locations. Defendants have the capacity to be sued pursuant to Federal Rule of Civil Procedure 17(b). Defendants direct their business activities towards consumers throughout the world, including the United States and within this district through the simultaneous operation of at least the fully interactive Internet commercial websites existing under the Subject Domain Names.

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

14. Defendants are directly and personally contributing to, inducing and engaging in the sale of counterfeit branded products as alleged herein, often 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' combined 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/or present controlling forces behind the operation of websites operating under at least the Subject Domain Names.

17. 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' trademarks to consumers within the United States and this district through at least the commercial 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, and/or sale of counterfeit branded goods into the State, and by operating an illegal marketplace enterprise which impacts and interferes with legitimate commerce throughout the United States, including within the State of Florida.

18. Defendants have registered or purchased, and maintained the Subject Domain Names, and the websites operating thereunder. Defendants may have engaged in fraudulent conduct with respect to the registration of the Subject Domain Names by providing false and/or misleading information during the registration or maintenance process. Defendants have

registered and/or maintained their Subject Domain Names for the sole purpose of engaging in unlawful infringing counterfeiting activities.



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

20. Defendants' use their Internet-based businesses to infringe the intellectual property rights of Plaintiffs and others.

21. Defendants' Subject Domain Names and any other domain names and aliases used in connection with the sale of counterfeit and infringing goods using Plaintiffs' trademarks are essential components of Defendants' online activities and are the means by which Defendants further their counterfeiting and infringement scheme and cause harm to Plaintiffs. Moreover, Defendants are using Plaintiffs' famous names and 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.



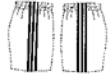
COMMON FACTUAL ALLEGATIONS




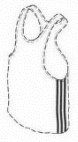

adidas's Trademark Rights

22. adidas is currently, and for years has been, one of the world's leading manufacturers of athletic footwear, apparel, and sporting equipment. adidas has used its famous and distinctive trademarks **adidas**,  ,  , Three-Stripe Mark, THE BRAND WITH THE 3 STRIPES Mark, BOOST Mark, NMD Mark, SPLY-350 Mark, and SUPERSTAR Mark

(collectively, the “adidas Marks”), for many years in connection with the above-mentioned goods. The adidas Marks signify the quality and reputation of adidas products.

23. adidas is the owner of multiple trademark registrations for the adidas Marks, including the following valid trademark registrations, issued by the United States Patent and Trademark Office:

Trademark	Registration Number	Registration Date	Class / Goods
ADIDAS	0,891,222	May 19, 1970	IC25. sport shoes namely, track and field shoes, baseball, boxing, football, skating, golf, and soccer shoes; sportswear namely, suits, shorts, pants, tights, shirts, gloves, and the like; jerseys; socks; sport shoes namely, track and field training shoes, basketball shoes, and tennis shoes.
	0,973,161	November 20, 1973	IC 018. tote bags. IC 25. specific purpose athletic shoes; general purpose sport shoes, sportswear-namely, suits, shorts, pants, tights, shirts, jerseys, socks, and gloves.
adidas	1,300,627	October 16, 1984	IC 025. Sportswear-Namely, Suits, Shorts, Pants, Tights, Shirts, Jerseys, Socks, Gloves, Jackets, Coats, Swimwear, Sweaters, Caps, Pullovers, Warm-Up Suits, Boots, Shoes, Slippers.
	1,310,140	December 18, 1984	IC 025. Sportswear-Namely, Suits, Shorts, Pants, Tights, Shirts, Jerseys, Socks, Gloves, Jackets, Coats, Swimwear, Sweaters, Caps, Pullovers, Warm-Up Suits, Rain Suits, Ski Suits, Jump Suits, Boots, Shoes, Slippers.
THE BRAND WITH THE 3 STRIPES	1,674,229	February 4, 1992	IC 025. boots, slippers, sandals; shoes, boots and after ski boots for hiking and trekking, athletic shoes and general-purpose sports shoes.
	2,278,591	September 21, 1999	IC 25. sports and leisure wear, namely, shorts.

	2,411,802	December 12, 2000	<p>IC 018. All purpose sport bags, athletic bags, traveling bags, backpacks, knapsacks.</p> <p>IC 025. Sports and leisure wear, namely, shorts, pants, shirts, T-shirts, jerseys, socks, gloves, jackets, swimwear, caps and hats, pullovers, sweat-shirts, sweat suits, track suits, warm-up suits; boots, sandals, specific purpose athletic shoes and general all purpose sports shoes.</p> <p>IC 028. Sports balls and playground balls; guards for athletic use, namely, shin guards, knee guards and leg guards.</p>
	3,029,129	December 13, 2005	IC 025. Footwear.
	3,029,135	December 13, 2005	IC 025. Footwear.
	3,087,329	May 2, 2006	IC 025. Clothing, namely, shirts, t-shirts, sweatshirts, vests, jackets and coats
	3,104,117	June 13, 2006	<p>IC 009. Optical apparatus and instruments, namely, eyeglasses and sunglasses.</p> <p>IC 014. Horological and chronometric instruments, namely, watches</p> <p>IC 018. Leather and imitations of leather, and goods made from these materials in the nature of bags for general and sport use, namely, handbags, tote bags, waist packs, overnight bags, backpacks, knapsacks and beach bags; trunks; traveling bags for general and sport use; leather and imitations of leather and goods made from these materials, namely, wallets, briefcases.</p>

			IC 025. Sports and leisure wear, namely suits, shorts, pants, sweatpants, skirts, skorts, dresses, blouses, shirts, T-shirts, sleeveless tops, polo shirts, vests, jerseys, sweaters, sweatshirts, pullovers, coats, jackets, track suits, training suits, warm-up suits, swimwear, underwear, socks, gloves, scarves, wristbands and belts; headgear, namely caps, hats, visors, headbands; athletic footwear and leisure foot wear, namely boots, sandals, specific purpose athletic shoes and general purpose sports shoes.
BOOST	3,580,958	February 24, 2009	IC 025. Clothing, namely, shirts; footwear.
NMD	5,218,628	June 6, 2017	IC 025. Footwear.
SPLY-350	5,413,495	February 27, 2018	IC 025. Footwear
SUPERSTAR	5,871,181	October 1, 2019	IC 025. Footwear; the aforementioned goods not related to the topic, theme or subject of historical airplanes.

The adidas Marks are used in conjunction with the design, manufacture, and distribution of quality goods in the categories identified above. True and correct copies of the Certificates of Registration for the adidas Marks are attached hereto as Composite Exhibit “1.”

24. The adidas Marks have been used in interstate commerce to identify and distinguish adidas products for an extended period of time and serve as symbols of adidas’s quality, reputation, and goodwill.

25. The adidas Marks are well-known and famous and have been for many years. adidas has expended substantial time, money and other resources developing, advertising and otherwise promoting the adidas Marks. Specifically, adidas has used the adidas Marks in connection with its frequent sponsorship of sports tournaments and organizations, as well as professional athletes and collegiate sports teams. For example, adidas has long-term

relationships with the University of Nebraska, and the University of Louisville. Among many others, NBA stars Derrick Rose and James Harden, NFL stars Aaron Rodgers and Dak Prescott, NHL star P.K. Subban, baseball player Kris Bryant, and soccer stars David Beckman and Lionel Messi all are sponsored by adidas. For many years, adidas has been a sponsor of the World Cup soccer tournament, has sponsored the world-famous Boston Marathon for more than a decade, and has sponsored many other events, teams, and individuals. Prominent use of the adidas Marks in connection with these sponsorship activities has further enhanced the adidas Marks' recognition and fame.

26. adidas has extensively used, advertised, and promoted the adidas Marks in the United States in association with the sale of quality products. adidas has expended enormous resources promoting the adidas Marks and products bearing the adidas Marks. In recent years, annual sales of products using the adidas Marks have totaled in the billions of dollars globally and in the hundreds of millions of dollars within the United States.

27. The adidas Marks have achieved secondary meaning among consumers as identifiers of quality goods as a result of adidas's advertisement, promotion, and sale of such goods thereunder.




28. As a result of adidas's efforts, members of the consuming public readily identify merchandise bearing or sold using the adidas Marks, as being quality merchandise sponsored and approved by adidas.

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


30. Genuine goods bearing the adidas Marks are widely legitimately advertised and promoted by adidas, authorized distributors and unrelated third parties via the Internet. Visibility



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

Rebook's Trademark Rights

31. Reebok is currently, and for years has been, one of the world's leading manufacturers of athletic footwear, apparel, and sporting equipment. Reebok has used its trademarks, REEBOK, , , and  (collectively, the "Reebok Marks") for many years, in connection with the above-mentioned goods. The Reebok Marks signify the quality and reputation of Reebok products.

32. Reebok is the owner of multiple trademark registrations for the Reebok Marks, including the following valid trademark registrations, issued by the United States Patent and Trademark Office:

Trademark	Registration Number	Registration Date	Class / Goods
REEBOK	1,133,704	April 22, 1980	IC 25. Shoes for use in athletic sports.
	1,356,835	August 27, 1985	IC 025. Shoes and running suits comprising jackets and pants
REEBOK	1,390,793	April 22, 1986	IC 018. All purpose sport bags IC 25. Sweatpants, shorts, sweaters, polo shirts, hats, visors, headbands, sweatbands, t-shirts, sweatshirts.

Trademark	Registration Number	Registration Date	Class / Goods
	1,848,848	August 9, 1994	IC 018. All purpose sport bags, duffel bags. IC 025. Footwear and apparel; namely, T-shirts, shirts, sweatshirts, sweaters, jackets, hats, visors, socks, sweatpants, pants, shorts, skirts, unitards, and leotards.
	4,092,269	January 24, 2012	IC 025. Footwear; apparel, namely, shirts, tops, jackets, pants, shorts, athletic uniforms, socks, tights, gloves and, bras; headwear, namely, caps, hats and head bands. IC 041. Consulting services in the fields of fitness and exercise; physical fitness and exercise training services; providing physical fitness and exercise instruction; entertainment in the nature of competitions in the field of weightlifting, cross-training, and overall physical fitness; organizing physical fitness competitions; providing motivational speakers and personal appearances by athletes and physical fitness experts; health and fitness club services, namely, providing instruction, facilities, and equipment in the field of physical exercise; organizing and conducting classes, seminars, and workshops in the field of fitness

The Reebok Marks are used in conjunction with the design, manufacture, and distribution of quality goods in the categories identified above. True and correct copies of the Certificates of Registration for the Reebok Marks are attached hereto as Composite Exhibit “2.”

33. The Reebok Marks have been used in interstate commerce to identify and distinguish Reebok products for an extended period of time and serve as symbols of Reebok’s quality, reputation, and goodwill.

34. The Reebok Marks are well-known and famous and have been for many years. Reebok has expended substantial time, money and other resources developing, advertising and otherwise promoting the Reebok Marks. Specifically, Reebok has used the Reebok Marks in connection with its frequent sponsorship of sports tournaments and organizations, and professional athletes. For example, Reebok sponsors numerous entertainers and prominent professional athletes. Among the entertainers Reebok works with are rapper Cardi B and supermodel Camile Kostek. Reebok's professional athletes include U.S. Women's Soccer Star and 2021 Olympian Julie Ertz, NFL tight end Zac Ertz, former NBA & WNBA players Allen Iverson, Shaquille O'Neal, Dee Brown, Shawn Kemp, and Ty Young, current NBA & WNBA players Montrezl Harrell, Josh Richardson, and Lexie Brown, UFC Fighter Khabib Nurmagomedov, and 2021 U.S. Olympic weightlifter CJ Cummings. Reebok also sponsors four-time CrossFit Games Champion Rich Froning, Jr., as well as CrossFit Games Champions Haley Adams, Annie Thorisdottir, and Pat Vellner. Reebok is also the title sponsor of the Midnight Runners, a global running community, and the Reebok Boston Track Club, a professional running team with members including 2021 Canadian Olympian track star Justyn Knight and British Olympian Amy Eloise Markovc. And Reebok is the official footwear and apparel partner of Les Mills, the world's largest provider of choreographed group fitness classes at health clubs. Reebok also works with noted fashion designers Pyer Moss, Maison Margiela, and Victoria Beckham, as well as notable streetwear brands such as Bronze 56K, Palace, and JJJJound. Reebok has high-profile current collaborations with toymaker Hasbro for its Power Rangers, Candyland, and Nerf brands, celebrity hair stylist and colorist Daniel Moon, and First We Feast's web series, Hot Ones.

35. Reebok has extensively used, advertised and promoted the Reebok Marks in the United States in association with the sale of quality products. Reebok has spent millions of dollars promoting the Reebok Marks and products bearing the Reebok Marks. In recent years, Reebok has sold hundreds of millions of dollars of products bearing the Reebok Marks.

36. The Reebok Marks have achieved secondary meaning among consumer as identifiers of quality goods as a result of Reebok's advertisement, promotion and sale of such goods thereunder.

37. As a result of Reebok's efforts, members of the consuming public readily identify merchandise bearing or sold using the Reebok Marks, as being quality merchandise sponsored and approved by Reebok.

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

39. Genuine goods bearing the Reebok Marks are widely legitimately advertised and promoted by Reebok, authorized distributors and unrelated third parties via the Internet. Visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing is important to Reebok's overall marketing and consumer education efforts. Thus, Reebok expends significant monetary and other resources on Internet marketing and consumer education, including SEO and SEM strategies. Those strategies allow Reebok and its authorized retailers educate consumers fairly and legitimately about the value associated with the Reebok Marks and the goods sold thereunder.

Defendants' Infringing Activities

40. In blatant disregard of Plaintiffs' rights, Defendants are each promoting and advertising, distributing, selling, and/or offering for sale goods in interstate commerce using

counterfeits and confusingly similar imitations of the adidas Marks and/or the Reebok Marks (the “Counterfeit Goods”) through at least 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 displaying Plaintiffs’ branded items offered for sale are attached hereto as Composite Exhibit “3.” Specifically, Defendants are each using the adidas Marks and/or the Reebok Marks (collectively, “Plaintiffs’ Marks”) to initially attract online consumers and drive them to Defendants’ ecommerce stores operating under the Subject Domain Names. Defendants are using identical copies of one or more of 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’ merchandise.

41. Defendants’ Counterfeit Goods are of a quality substantially different than that of Plaintiffs’ genuine goods. Defendants 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. Defendants’ actions are likely to cause confusion of consumers at the time of initial interest, sale, and in the post-sale setting, who will believe all of Defendants’ goods are genuine goods originating from, associated with, and/or approved by Plaintiffs.

42. Defendants advertise their e-commerce store websites, including their Counterfeit Goods offered for sale to the consuming public via at least the Internet websites operating under the Subject Domain Names. In so advertising their stores and products, Defendants improperly and unlawfully use one or more of Plaintiffs’ Marks without authority.

43. As part of their overall unlawful scheme, most Defendants are, upon information and belief, concurrently employing and benefitting from substantially similar, advertising and marketing strategies based, in large measure, upon an illegal use of counterfeits and infringements of Plaintiffs' Marks. Specifically, Defendants are using counterfeits and infringements of Plaintiffs' famous names and Plaintiffs' Marks to make their websites selling illegal goods appear more relevant and attractive to consumers searching for both Plaintiffs' and non-Plaintiffs' goods and information online. By their actions, Defendants are contributing to the creation and maintenance of an illegal marketplace operating in parallel to the legitimate marketplace for Plaintiffs' genuine goods. Defendants are causing individual, concurrent and indivisible harm to Plaintiffs and the consuming public by (i) depriving Plaintiffs of their right to fairly compete for space online and 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/or (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.

44. Defendants are concurrently conducting and targeting their counterfeiting and infringing activities toward consumers and likely causing unified 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.

45. Upon information and belief, at all times relevant hereto, Defendants in this action have 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.

46. 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.

47. 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' 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.

48. Defendants' above identified infringing activities are likely to cause confusion, deception, and mistake in the minds of consumers before, during, and after the time of purchase. Moreover, Defendants' wrongful conduct is likely to create a false impression and deceive customers into believing there is a connection or association between Plaintiffs' respective genuine goods and Defendants' Counterfeit Goods, which there is not.

49. Additionally, Defendants 1-79 have registered their respective Subject Domain Names, using marks that are nearly identical and/or confusingly similar to at least one of Plaintiffs' Marks, (the "Cybersquatted Subject Domain Names").

50. Defendants 1-79 have registered and/or used the Cybersquatted Subject Domain Names with the bad faith intent to profit from Plaintiffs' Marks.

51. 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.

52. Upon information and belief, Defendants 1-79 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.

53. Defendants 1-79 have never used the Cybersquatted Subject Domain Names in connection with a bona fide offering of goods or services.

54. Defendants 1-79 have not made any bona fide non-commercial or fair use of Plaintiffs' Marks on a website accessible under the Cybersquatted Subject Domain Names.

55. Defendants 1-79 have intentionally incorporated Plaintiffs' Marks in their Cybersquatted Subject Domain Names to divert consumers looking for Plaintiffs' websites to their own websites for commercial gain.

56. Given the visibility of Defendants' various websites and the similarity of their actions, including their advertising, marketing, and SEO activities, it is clear Defendants are either related or, at a minimum, cannot help but know of each other's existence and the unified harm likely to be caused to Plaintiffs and the overall consumer market in which it operates as a result of Defendants' concurrent actions.

57. Although some Defendants may be physically acting independently, they may properly be deemed to be acting in concert because the combined force of their actions serves to multiply the harm caused to Plaintiffs.

58. Plaintiffs have no adequate remedy at law.

59. Plaintiffs are suffering irreparable injury and have suffered substantial damages because of Defendants' unauthorized and wrongful use of Plaintiffs' Marks. If Defendants' counterfeiting and infringing, cybersquatting, and unfairly competitive activities, are not

preliminarily and permanently enjoined by this Court, Plaintiffs and the consuming public will continue to be harmed.

60. The harm and damages 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)

61. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 60 above.

62. 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, sale and/or offering for sale of the Counterfeit Goods.

63. Specifically, Defendants are promoting and otherwise advertising, selling, offering for sale, and/or distributing products using counterfeits and 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, sell, and/or offer to sell counterfeit and infringing branded goods.

64. Defendants' concurrent counterfeiting and infringing activities are likely to cause and 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.

65. Defendants' unlawful actions have caused and are continuing to cause unquantifiable damage and irreparable harm to Plaintiffs and are unjustly enriching Defendants with profits at Plaintiffs' expense.

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

67. Plaintiffs have no adequate remedy at law. Plaintiffs have suffered and will continue to suffer irreparable injury and damages due to Defendants' above-described activities if Defendants are not preliminarily and permanently enjoined. Additionally, Defendants will continue to wrongfully profit from their illegal activities.

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

68. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 60 above.

69. Defendants' Counterfeit Goods bearing, offered for sale, and sold under copies of one or more of Plaintiffs' Marks have been widely advertised and offered for sale throughout the United States.

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

71. Defendants have used in connection with their advertisement, offer for sale, and sale of the Counterfeit Goods, false designations of origin and false descriptions and

representations, including words or symbols which falsely describe or represent such goods and have caused such goods to enter commerce in the United States with full knowledge of the falsity of such designations of origin and such descriptions and representations, all to Plaintiffs' detriment.

72. Defendants have each authorized infringing uses of one or more of Plaintiffs' Marks in Defendants' advertisement and promotion of their counterfeit and infringing branded goods. Many 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.

73. Additionally, many Defendants are using counterfeits and infringements of one or more of Plaintiffs' Marks to unfairly compete with Plaintiffs and others for space within organic and paid search engine and social media results. Defendants are thereby jointly (i) depriving Plaintiffs of valuable marketing and educational space online which would otherwise be available to Plaintiffs, and (ii) reducing the visibility of Plaintiffs' genuine goods on the World Wide Web, including across social media platforms.

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

75. Plaintiffs have no adequate remedy at law. Plaintiffs have suffered and will continue to suffer irreparable injury and damages due to Defendants' above-described activities if Defendants are not preliminarily and permanently enjoined. Additionally, Defendants will continue to wrongfully profit from their illegal activities.

**COUNT III - CLAIM FOR RELIEF FOR CYBERSQUATTING
UNDER §43(d) OF THE LANHAM ACT (15 U.S.C. §1125(d))
(Against Defendants 1-79 only)**

76. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 60 above.

77. Defendants 1-79 have acted with the bad faith intent to profit from Plaintiffs' Marks and the goodwill associated with Plaintiffs' Marks by the registration and maintenance of the Cybersquatted Subject Domain Names.

78. Plaintiffs' Marks were distinctive and famous at the time Defendants 1-79 registered the Cybersquatted Subject Domain Names.

79. The Cybersquatted Subject Domain Names are identical to, confusingly similar to or dilutive of at least one of Plaintiffs' Marks.

80. Defendants 1-79's registration and maintenance of the Cybersquatted Subject Domain Names was done with knowledge and constitutes a willful violation of Plaintiffs' rights in Plaintiffs' Marks. At a minimum, Defendants' conduct constitutes reckless disregard for and willful blindness to Plaintiffs' Marks' rights.

81. Defendants 1-79's actions constitute cybersquatting in violation of §43(d) of the Lanham Act, 15 U.S.C. §1125(d).

82. Plaintiffs have no adequate remedy at law. Plaintiffs have suffered and will continue to suffer irreparable injury and damages due to Defendant Numbers 1-79's above-described activities if Defendant Numbers 1-79's are not preliminarily and permanently enjoined. Additionally, Defendant Numbers 1-79's will continue to wrongfully profit from their illegal activities.

COUNT IV - COMMON LAW UNFAIR COMPETITION

83. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 60 above.

84. This is an action against Defendants based on their (i) promotion, advertisement, distribution, sale and/or offering for sale of goods using or bearing marks which are virtually identical 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.

85. Specifically, Defendants are promoting and otherwise advertising, selling, offering for sale and/or distributing goods bearing counterfeits and infringements of one or more of Plaintiffs' Marks. Defendants are also each using counterfeits and infringements of one or more of Plaintiffs' Marks to unfairly compete with Plaintiffs and other for (i) space in search engine and social media results across an array of search terms and/or (ii) visibility on the World Wide Web.

86. Defendants' infringing activities are likely to cause and are causing confusion, mistake and deception among consumers as to the origin and quality of Defendants' e-commerce stores and websites as a whole and all products therein.

87. Plaintiffs have no adequate remedy at law. Plaintiffs have suffered and will continue to suffer irreparable injury and damages due to Defendants' above-described activities if Defendants are not preliminarily and permanently enjoined. Additionally, Defendants will continue to wrongfully profit from their illegal activities.

COUNT V - COMMON LAW TRADEMARK INFRINGEMENT

88. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 60 above.

89. Plaintiffs are the owners of all common law rights in and to Plaintiffs' Marks.

90. 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 one or more of Plaintiffs' Marks.

91. Specifically, each Defendant is promoting and otherwise advertising, distributing, offering for sale, and selling goods using or bearing infringements of one or more of Plaintiffs' Marks.

92. Defendants' infringing activities are likely to cause and are causing confusion, mistake and deception among consumers as to the origin and quality of Defendants' Counterfeit Goods bearing Plaintiffs' Marks.

93. Plaintiffs have no adequate remedy at law. Plaintiffs have suffered and will continue to suffer irreparable injury and damages due to Defendants' above-described activities if Defendants are not preliminarily and permanently enjoined. Additionally, Defendants will continue to wrongfully profit from their illegal activities.

PRAYER FOR RELIEF

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

a. Entry of temporary, preliminary, and permanent injunctions pursuant to 15 U.S.C. § 1116, 28 U.S.C. § 1651(a), The All Writs Act, 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 design similar thereto, in connection with the sale of any unauthorized goods; from

using any logo, trade name, trademark or design which 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 which 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' names or trademarks; and from otherwise unfairly competing with Plaintiffs.

b. Entry of temporary, preliminary, and permanent injunctions pursuant to 28 U.S.C §1651(a), The All Writs Act, and the Court's inherent authority, enjoining Defendants and all third parties with actual notice of an injunction issued by the Court from participating in, including providing financial services, technical services or other support to, Defendants in connection with the sale and distribution of non-genuine goods bearing and/or using counterfeits or infringements of Plaintiffs' Marks.

c. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, than, upon Plaintiffs' request, those acting in concert or participation with Defendants who have notice of the injunction, as service providers cease

hosting, facilitating access to, or providing any supporting service to any and all domain names, including but not limited to the Subject Domain Names, and websites through which Defendants engage in the promotion, offering for sale and/or sale of goods bearing and/or using counterfeits and/or infringements of Plaintiffs' Marks.

d. Entry of an order pursuant to 15 U.S.C. § 1116, 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, that upon Plaintiffs' request, Defendants and the top level domain (TLD) Registry for each of the Subject Domain Names, and any other domain names used by Defendants, 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, and any other domain names being used and/or controlled by Defendants to engage in the business of marketing, offering to sell, and/or selling goods bearing and/or using counterfeits or infringements of Plaintiffs Marks, to the IP addresses where the associated websites are hosted.

e. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, 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 to Plaintiffs' control so they may no longer be used for unlawful purposes.

f. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, that, upon Plaintiffs' request, any Internet marketplace website operators and/or administrators, registrar and/or top level domain (TLD) Registry for the Subject

Domain Names who are provided with notice of an injunction issued by the Court identify any e-mail address known to be associated with Defendants' respective Subject Domain Name.

g. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, authorizing Plaintiffs to serve the injunction on any e-mail service provider with a request that the service provider permanently suspend the e-mail addresses which are or have been used by Defendants in connection with Defendants' promotion, offering for sale, and/or sale of goods using counterfeits and/or infringements of Plaintiffs' Marks.

h. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, authorizing Plaintiffs to request any Internet search engines which are provided with notice of the order, to permanently disable, de-index or delist all URLs of the Subject Domain Names by Defendants to promote, offer for sale and/or sell goods bearing counterfeits and/or infringements of Plaintiffs' Marks, based upon Defendants' unlawful activities being conducted via the Subject Domain Names as a whole and via the URLs identified by Plaintiffs.

i. Entry of an order requiring each Defendant, its agent(s) or assign(s), to assign all rights, title, and interest, to its Subject Domain Name(s) to Plaintiffs and, if within five (5) days of entry of such order any Defendant fails to make such an assignment, the Court order the act to be done by another person appointed by the Court at any non-complying Defendant's expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a).

j. Entry of an requiring each Defendant, its agent(s) or assign(s), to instruct all search engines to permanently delist or deindex the Subject Domain Name(s) and, if within five (5) days of entry of such order any Defendant fails to make such a written instruction, the Court order the act to be done by another person appointed by the Court at any non-complying

Defendant's expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a).

k. Entry of an order requiring Defendants to account to and pay Plaintiffs for all profits and damages resulting from Defendants' trademark counterfeiting and infringing and unfairly competitive 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 type sold, as provided by 15 U.S.C. §1117(c)(2) of the Lanham Act.

l. Entry of an order requiring Defendants 1-79 to account to and pay Plaintiffs for all profits and damages resulting from Defendants 1-79's 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 Defendants 1-79 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.

m. Entry of an award pursuant to 15 U.S.C. § 1117 (a) and (b) of Plaintiffs' costs and reasonable attorneys' fees and investigative fees associated with bringing this action.

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

o. Entry of an Order requiring Defendants to pay the cost necessary to correct any erroneous impression the consuming public may have received or derived concerning the nature, characteristics, or qualities of Defendants' products, including without limitation, the placement of corrective advertising and providing written notice to the public.

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

DATED: July 22, 2021.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

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E-mail: raquel@smgpa.net

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SCHEDULE A
DEFENDANTS BY NUMBER AND SUBJECT DOMAIN NAME

Defendant Number	Defendant / Domain Name
1	adidasco.com
2	adadassuperstar.com
3	adidasaustralia.com
4	adidasch.org
5	adidasdenmark.org
6	adidasemportugal.org
7	adidasepood.com
7	terrexeesti.com
8	adidasfalcongreece.com
9	adidasgreece.org
10	adidasgreeceshoes.com
11	adidashrvatskaonline.com
12	adidashu.top
13	adidasinida.com
14	adidaskengat.fi
15	adidasmix.com
16	adidasnmdboost.com
17	adidasnmdchukka.com
18	adidasnmduomi.org
19	adidasoriginalshoesuk.com
20	adidasoutletnorge.com
21	adidasr.top
22	adidasshoesnz.com
23	adidasshopromania.net
24	adidassneakersaustralia.com
25	adidassuperstargr.top
26	adidasverigebutik.com
27	adidas-tenisky.com
28	adidastr.com
29	adidas-uk.com
30	adidasultraboostale.fi
31	adidas-yeezy.org
32	adidas-yeezy-boost.com
33	adidas-yeezy-boostonlinestore.com
34	adidas-yeezy-online.com
34	yeezy350s.com
34	yeezy350v2s.com
34	yeezysadidas.us

35	adidasyeeyonlinestore.us
36	adidasyeeyssupply.com
37	adidasyeeyusa.com
38	adiidasyeeybuysshoesonline.com
39	authenticadidas.com
40	authentic-boost.com
41	bestadidasstore.com
42	bestyeeyboost.com
43	camisetasadidas.com
44	negozioreebok.com
45	newboostoutlet.com
46	reebok-argentina.com
47	reebokbutiksverige.com
48	reebokbutypolska.com
49	reebokclassicindia.com
50	reebokclubc85vintage.com
51	reebokczoutlet.com
52	reebokhushop.com
53	reebokie.com
54	reebok-ireland.com
55	reeboklegacylifters.com
56	reebokno.com
57	reeboknzauckland.com
58	reebokoutletgreece.com
59	reebokoutlets.cc
60	reebokph.com
61	reebokportugallojas.com
62	reeboksgshoe.com
62	reebok-singapore.com
63	reeboksingaporesale.com
64	reebokskorabatt.com
65	reebok-southafrica.com
66	reeboksuomikengat.com
67	reebokvypredaj.com
68	saleadidasit.com
69	shopreebokhrvatska.com
70	skoreebokdk.com
71	stansmithindirim.com
72	superboostpro.com
73	tenisstansmith.com
74	topadidasoutlet.com
75	yeezybooststores.com
76	yeezyshoesboostshop.com

77	yeezyssboosts.com
78	zapatillasadidasbaloncesto.com
79	2020jerseyshop.com
80	2020soccershoes.com
81	adyeezyesjoy.com
82	blackbearcabinsinc.com
83	camisetacadizbaratas.com
84	camisetaosasunabaratas.com
85	camisetasdefutbolreplicas.com
86	camisetas-de-futbol-replicas.com
87	camisetasdefutbolreplicas2019.com
88	camisetasdefutbolreplicas2020.com
89	camisetasfutbolreplicas.com
90	camisetasreplicas.com
91	cheapairmaxshoes2sale.com
91	shoxhome.com
92	cheap-football.com
93	cheapnfljerseysband.com
93	hotjerseysdeal.com
94	cheapshoesnz.com
95	cheapshoespro.com
96	cheapshoesrunning.com
97	cheapsneakerspro.com
98	cheapsnk.com
99	cheapsoccerkit.com
100	cheapspotrnz.com
101	cheapuasneakers.com
102	cheapyezyes.com
103	cheapyezyshoes.shop
104	dalrannochch.com
105	discountshopjerseys.top
106	dosoccerjersey.net
107	elevenkicks.com
108	es-futbolreplica.com
109	fakeyezy.to
110	febshoe.com
111	futbolreplica.com
112	goedkopevoetbalshirts-replica.com
113	holacamisetasdefutbolreplicas.com
114	holafutbolreplica.com
115	homesideflorist.com
116	horstloewel.com
116	horstloewel.top

117	jerseygoal.co
118	jersey-kingdom.co
119	jerseys1st.com
120	jerseys21.com
121	magliecalcio replica.com
122	magliecalcio replica2020.com
123	magliecalcio replicas2020.com
124	minejerseys.com.cn
124	vipmjshop.com
125	n7-kits.co
126	onlineyeezys.com
127	onlyeezy.com
127	onlyeezy.ru
128	outletyeezyshoes.com
129	pascheryeezy.com
130	repfashions.co
131	replicascamisetasbaratas2019.com
132	replicascamisetasdefutbol2019.com
133	replicascamisolasdefutbol.com
134	replicasdecamisetas2020.com
135	replicasoccerjersey.net
136	replicasoccerjerseys.net
137	replicavoetbal.com
138	replicavoetbalshirts.com
139	salecheapsoccerjerseys.com
140	scarpeitsale.com
141	sneakerfactoryshop.com
142	sneakersonline.club
143	soccerjerseyspecial.com
144	soleoffer.org
145	supplyyeezys.us
146	taksitarife.com
146	taksitarife.top
147	terrexcheap.fr
148	tucsonfca.com
149	ussoccerjersey.us
150	voetbalshirtgoedkope.com
151	voetbalshirtsreplica2019.com
152	warungsangrai.com
153	wholesale-cheapshoes.net
154	yeezy350greece.com
155	yeezy350norge.com
156	yeezy350v2.us

157	yeezyator.com
158	yeezybestbuyshoes.com
159	yeezy-boots.online
160	yeezybshop.com
161	yeezycheap4salse.com
162	yeezydaily.net
163	yeezyfans.com
164	yeezygogo.com
165	yeezyiner.com
166	yeezyirshop.com
167	yeezyistic.com
168	yeezyistore.com
169	yeezyitaly.com
170	yeezylder.com
171	yeezylic.com
172	yeezym.com
173	yeezynac.com
174	yeezyobuy.com
175	yeezyshoesbest.com
176	yeezyshoppingshoes.com
177	yeezyshoppingstore.com
178	yeezyslideshop.com
179	yeezyslidetime.com
180	yeezyoutlet.com
181	yeezyuish.com
182	yeezyupshop.com
183	yeezyxshoes.com
184	zswse.com