

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

Case No. 22-cv-60228-BLOOM/Valle

LOUIS VUITTON MALLETIER,

Plaintiff,

v.

LVHUT.NET, *et al.*,

Defendants.

/

FINAL DEFAULT JUDGMENT AND PERMANENT INJUNCTION

THIS CAUSE is before the Court upon Plaintiff's Motion for Entry of Final Default Judgment Against Defendants, ECF No. [29] ("Motion"), filed on April 3, 2022. For the reasons set forth in the Court's Order on the Motion, ECF No. [30], **FINAL JUDGMENT** is entered, pursuant to Federal Rule of Civil Procedure 58, in favor of Plaintiff, Louis Vuitton Malletier ("Plaintiff") and against Defendants, the Individuals, Partnerships, and Unincorporated Associations identified on Schedule "A" hereto (collectively "Defendants") on all Counts of the Complaint as follows:

(1) **Permanent Injunctive Relief:** Defendants and their officers, directors, employees, agents, subsidiaries, distributors, and all persons acting in concert and participation with Defendants are hereby permanently restrained and enjoined from:

- a. manufacturing or causing to be manufactured, importing, advertising, or promoting, distributing, selling or offering to sell counterfeit and infringing goods bearing and/or using Plaintiff's trademarks, or confusingly similar

trademarks identified in Paragraph 17 of the Complaint (the “Louis Vuitton Marks”);

- b. using the Louis Vuitton Marks in connection with the sale of any unauthorized goods;
- c. using any logo, and/or layout which may be calculated to falsely advertise the services or products of Defendants as being sponsored by, authorized by, endorsed by, or in any way associated with Plaintiff;
- d. falsely representing themselves as being connected with Plaintiff, through sponsorship or association;
- e. engaging in any act which is likely to falsely cause members of the trade and/or of the purchasing public to believe any goods or services of Defendants are in any way endorsed by, approved by, and/or associated with Plaintiff;
- f. using any reproduction, counterfeit, copy, or colorable imitation of the Louis Vuitton Marks in connection with the publicity, promotion, sale, or advertising of any goods sold by Defendants;
- g. affixing, applying, annexing or using in connection with the sale of any goods, a false description or representation, including words or other symbols tending to falsely describe or represent goods offered for sale or sold by Defendants as being those of Plaintiff or in any way endorsed by Plaintiff and from offering such goods in commerce;
- h. otherwise unfairly competing with Plaintiff;

- i. using the Louis Vuitton Marks, or any confusingly similar trademarks, within domain name extensions, metatags, or other markers within website source code, from use on any webpage (including as the title of any web page), from any advertising links to other websites, from search engines' databases or cache memory, and from any other form of use of such terms which are visible to a computer user or serves to direct computer searches to websites or domain names, registered by, owned, or operated by Defendants; and
- j. effecting assignments or transfers, forming new entities or associations or utilizing any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth above.

(2) **Additional Equitable Relief:** In order to give practical effect to the Permanent Injunction:

- a. The domain names identified on Schedule "A" hereto (the "Subject Domain Names"), are hereby ordered to be immediately transferred by Defendants, their assignees and/or successors in interest or title, and the Registrars to Plaintiff's control. To the extent the current Registrars do not facilitate the transfer of the Subject Domain Names to Plaintiff's control within five (5) days of receipt of this Judgment, upon Plaintiff's request, the top level domain (TLD) Registry for each of the Subject Domain Names, or their administrators, including backend registry operators or administrators, shall, within thirty (30) days, (i) change the Registrar of Record for the Subject Domain Names to a Registrar of Plaintiff's choosing, and that

Registrar shall transfer the Subject Domain Names to Plaintiff, or (ii) place the Subject Domain Names on Registry Hold status for the life of the current registration, thus removing them from the TLD zone files maintained by the Registries which link the Subject Domain Names to the IP addresses where the associated websites are hosted;

- b. Plaintiff may serve this injunction on any Internet search engines or any service provider referring or linking users to any specific URLs of the Subject Domain Names with a request that the service provider permanently disable the references or links to, and/or permanently de-index or delist any specific URLs identified by Plaintiff which are being used by Defendants in connection with the offering for sale or sale of goods bearing counterfeits of the Louis Vuitton Marks, based upon Defendants' unlawful activities being conducted via the Subject Domain Names as a whole and via the URLs identified by Plaintiff;
- c. Plaintiff may serve this injunction on the domain name registrar(s) and/or the privacy protection service(s) for the Subject Domain Names to disclose to Plaintiff the true identities and contact information for the registrants of the Subject Domain Names;
- d. Plaintiff may serve this injunction on any service provider, including specifically Cloudflare, Inc., with a request to permanently cease providing any services to Defendants in connection with 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 using counterfeits of the Louis Vuitton Marks, including permanently deleting the Subject Domain Names from its DNS used for the DoH (1.1.1.1);

- e. Defendants, their agent(s) or assign(s), shall assign in writing all rights, title, and interest, to their Subject Domain Name(s) to Plaintiff and, if within five (5) days of receipt of this Order Defendants fail to make such an assignment, the Court shall order the act to be done by another person appointed by the Court at Defendants' expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a);
- f. Defendants, their agent(s) or assign(s), shall instruct in writing all search engines to permanently delist or deindex the Subject Domain Name(s) and, if within five (5) days of receipt of this Order Defendants fail to make such a written instruction, the Court shall order the act to be done by another person appointed by the Court at Defendants' expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a);
- g. Defendants, their agent(s) or assign(s), shall instruct the Registrar(s) for each of their Subject Domain Name(s) to permanently close the domain registration account(s) in which any Subject Domain Name(s) are located and, if within five (5) days of receipt of this Order Defendants fail to make such a written instruction, the Court shall order the act to be done by another person appointed by the Court at Defendants' expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a); and

- h. Defendants, their agent(s) or assign(s), shall instruct in writing all service providers, including specifically CloudFlare, Inc., to permanently cease providing any services to Defendants in connection with any and all domain names, including but not limited to the Subject Domain Name(s), and websites through which Defendants engage in the promotion, offering for sale and/or sale of goods using counterfeits of the Louis Vuitton Marks, including permanently deleting the Subject Domain Names from its DNS used for the DoH (1.1.1.1), 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 Defendant's expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a).

(3) Statutory damages pursuant to 15 U.S.C. § 1117(c): Plaintiff is entitled to an award of statutory damages of \$1,000,000 against each Defendant pursuant to 15 U.S.C. § 1117(c), for which let execution issue, based upon the Court's finding that each Defendant infringed at least one trademark on one type of good. The Court considered both the willfulness of the Defendants' conduct and the deterrent value of the award imposed, and the award falls within the permissible statutory range under 15 U.S.C. § 1117(c).

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

- a. \$10,000 against Defendant Number 1 - lvhut.net, for its domain name lvhut.net, for which let execution issue;
- b. \$10,000 against Defendant Number 2 - louis-special-sale.shop, for its domain name louis-special-sale.shop, for which let execution issue;
- c. \$10,000 against Defendant Number 3 - goslouisvuitton.com, for its domain name goslouisvuitton.com, for which let execution issue;

- d. \$10,000 against Defendant Number 4 - louisved.xyz, for its domain name louisved.xyz, for which let execution issue;
- e. \$10,000 against Defendant Number 5 - louisvued.com, for its domain name louisvued.com, for which let execution issue;
- f. \$10,000 against Defendant Number 6 - louisvuitton-my.site, for its domain name louisvuitton-my.site, for which let execution issue;
- g. \$10,000 against Defendant Number 7 - lovelvbag.store, for its domain name lovelvbag.store, for which let execution issue;
- h. \$10,000 against Defendant Number 8 - lvicon.online, for its domain name lvicon.online, for which let execution issue;
- i. \$10,000 against Defendant Number 9 - lv-malaysia.store, for its domain name lv-malaysia.store, for which let execution issue;
- j. \$10,000 against Defendant Number 10 - lvoutlet.ca, for its domain name lvoutlet.ca, for which let execution issue;
- k. \$10,000 against Defendant Number 11 - lvreplicashop.com, for its domain name lvreplicashop.com, for which let execution issue;
- l. \$10,000 against Defendant Number 12 - lv-thegardens.com, for its domain name lv-thegardens.com, for which let execution issue;
- m. \$10,000 against Defendant Number 13 - malaysia-lv.com, for its domain name malaysia-lv.com, for which let execution issue;
- n. \$10,000 against Defendant Number 14 - malaysia-lvbag.store, for its domain name malaysia-lvbag.store, for which let execution issue;
- o. \$10,000 against Defendant Number 15 - my-lvbag.info, for its domain name my-lvbag.info for which let execution issue
- p. \$10,000 against Defendant Number 16 - perfectlouisvuittonsale.com, for its domain name perfectlouisvuittonsale.com, for which let execution issue;
- q. \$10,000 against Defendant Number 17 - replicalvonline.com, for its domain name replicalvonline.com, for which let execution issue;
- r. \$10,000 against Defendant Number 18 - thegardens-lv-kl.com, for its domain name thegardens-lv-kl.com, for which let execution issue;
- s. \$10,000 against Defendant Number 19 - toplvmall.com, for its domain name toplvmall.com, for which let execution issue.

(5) The Clerk of Court shall **RELEASE** the bond posted by Plaintiff in the amount of \$10,000.

(6) Interest from the date this action was filed shall accrue at the legal rate pursuant to 28 U.S.C. § 1961.

(7) The Court retains jurisdiction to enforce this Final Default Judgment and Permanent Injunction.

(8) The Clerk of Court shall **ADMINISTRATIVELY CLOSE** the case.

DONE AND ORDERED in Chambers at Miami, Florida on April 5, 2022.

A handwritten signature in black ink, appearing to be 'JB' or similar, written over a horizontal line.

BETH BLOOM
UNITED STATES DISTRICT JUDGE

Copies to:

Counsel of Record

SCHEDULE "A"
DEFENDANTS BY NUMBER AND SUBJECT DOMAIN NAME

Defendant Number	Defendant / Subject Domain Name
1	lvhut.net
2	louis-special-sale.shop
3	goslouisvuitton.com
4	louisved.xyz
5	louisvued.com
6	louisvuitton-my.site
7	lovelvbag.store
8	lvicon.online
9	lv-malaysia.store
10	lvoutlet.ca
11	lvreplicashop.com
12	lv-thegardens.com
13	malaysia-lv.com
14	malaysia-lvbag.store
15	my-lvbag.info
16	perfectlouisvuittonsale.com
17	replicavonline.com
18	thegardens-lv-kl.com
19	toplvmall.com
20	aaaluxurybags.com
21	66shop.ru
22	aaaclothing.ru
23	aaapurse.nu
24	aaareplica.co
25	aaraplica.com
26	abcbyiktuys.pw
27	acmaaslea.top
28	addnss.com
29	aimji.live
30	annjxauo.top
31	associateadapt.top
32	bagsreplica.de
33	baofse.top
34	bdkind.store
35	bdznednz.top

36	bestbag.shop
37	bestqualityreplica.ru
38	btsmud.top
39	buyebag.top
40	bvnta.top
41	bxsyeao.top
42	cbhjksv.top
43	cdftbag.top
44	chinareplicbagas.com
44	dolabuy.ru
44	replicacloibag.com
44	thebagsreplicas.com
45	cmsbeb.top
46	cnaveua.top
47	cnvjgrks.top
48	copybagssale.com
49	copyforbags.com
50	corabags.ru
51	csffbg.top
52	daphnesale.ru
53	demakoaf.top
54	dfsdfgrg.shop
55	dropthenew.com
56	dvrchbt.top
57	e8bags.co
58	ehdgfsh.top
59	eyushi.top
60	ezzcc.com
61	fabag.ru
62	fakescu.com
63	famouside.com
64	fashionbags-sale.com
65	fashionhouse.buzz
66	fasionoto.ru
67	fauxbagsale.com
68	fcdshsu.top
68	mnchwa.top
69	fxtayhk.top
70	gdhnawo.top
71	handbagsreplicastore.com

72	hbndgyw.top
73	hellosneaker.ru
74	kindsneaker.net
75	kopi-6.com
76	krosshop24.ru
77	lianwholesale.com
78	lilysale.ru
78	lilysite.ru
79	luxcrime.ru
79	lux-crime.ru
80	luxebagseu.com
81	luxesborse.com
82	luxruiy.com
83	luxury2018.com
84	luxurybagaa.com
85	luxurybagoutlet.com
86	luxurymybag.com
87	luxuryshoesu.de
88	luxurysuu.com
89	luxurytasticreps.ru
90	luxusdiva.com
91	mandybrands-03.com
92	mcdeue.top
93	mchauti.top
94	mckswhtop
95	mdjitcx.top
96	methodc.com
97	mfjercn.top
98	mfvjrsuw.top
99	mgifkdls.top
100	mgsaywa.top
101	mhsebag.top
102	mhycbag.top
103	mnxhua.top
104	mnxwok.top
105	modecina.cn
105	modecina.ru
106	mxnbzw.top
107	mxsajkw.top
108	mzbhwu.top

109	nbvrtf.top
110	ncaxzjbn.top
111	nceubag.top
112	ncmfjrs.top
113	ncrsfsd.top
114	ncyeesizs.top
115	ndsyve.top
116	neverfulloutlet.com
117	newbuybuystations.com
118	ngfsfsd.top
119	nmjhac.top
120	nvxdedx.top
121	nyseti.top
122	originalhandbag.top
123	outletborsa.net
124	perfectfakebags.com
125	pkajstore.com
126	pkshoe.com
126	pkshoe.net
127	popbrandcenter.com
128	pursevalleyfactory.la
129	qdfdnv.top
130	qdncz.top
131	qualitybestbags.com
132	real-fashion24.com
133	replica-watches-germany.com
134	replicawatchespro.co
135	replicaxi.com
136	resinstatue.club
137	sdehbag.top
138	sffp.shop
139	sneakerinbox.com
140	taikcmj.top
141	tangerjapanoutlet.com
142	thcodway.com
143	theybag.top
144	tikhub.ru
145	toplifeshop.com
146	towbag.shop
147	udifskb.top

148	uenmbag.top
149	uhdsahwo.top
150	ujhyfsdt.top
151	vipsluxurybags.com
152	vlixcolux.com
153	vmnxjews.top
154	wdvbf.top
155	wfvnbag.top
156	xcfwnm.top
157	xndjosen.top
158	xnhyao.top
159	xnwyid.top
160	yangyuejianqiali.com
161	yfkew.com
162	yreplcabags.com
163	ytgfdlcm.top
164	ytrfegh.top