

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 22-60284-CIV-DIMITROULEAS**

CHANEL, INC.,

Plaintiff,

vs.

21578975, *et al.*,

Defendants.

**DECLARATION OF ERIC ROSALER IN SUPPORT OF PLAINTIFF’S MOTION
FOR FINAL DEFAULT JUDGMENT AGAINST THE DEFENDANTS**

I, Eric Rosaler, declare and state as follows:

1. I am over 18 years of age, and I have personal knowledge of the facts set forth herein. I make this Declaration in support of Plaintiff’s Motion for Final Default Judgment against the Defendants (the “Motion for Final Default”), and, if called upon to do so, I could and would competently testify to the following facts set forth below.

2. I am an officer of AED Investigations, Inc., a licensed private investigative firm.

3. Counsel for Plaintiff, Chanel, Inc. (“Chanel” or “Plaintiff”), retained my firm to investigate and document the suspected sale of counterfeit versions of Plaintiff’s products by Defendants, the Individuals, Business Entities, and Unincorporated Associations Identified on Schedule “A” hereto (collectively “Defendants”).

4. Prior to filing this Declaration, my firm accessed Defendants’ Internet based e-commerce stores operating under their respective store identification numbers set forth on Schedule “A” hereto (the “Store IDs”). Upon accessing each e-commerce store operating under the Store IDs, my firm was able to view products bearing Chanel’s trademarks, add products to the online shopping cart, proceed to a point of checkout, and otherwise actively exchange data

electronically with each Defendant. My firm then placed an order from each Defendant via their Store IDs for the purchase of various products – each bearing and/or using counterfeits and infringements of at least one of Chanel’s trademarks at issue in this action and requested each product to be shipped to the Southern District of Florida. Each order was processed entirely online and following the submission of the orders, my firm received information for finalizing payment¹ via DHgate.com for the products ordered via Defendants’ e-commerce stores operating under the Store IDs as identified on Schedule “A” hereto. At the conclusion of the process, the detailed web pages and images my firm captured and downloaded reflecting each product ordered were sent to Chanel’s counsel.

5. True and correct copies of the web page captures and images showing the various Chanel-branded products my firm ordered via Defendants’ e-commerce stores operating under the Store IDs are attached hereto as Composite Exhibit “1.”

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 1st day of April, 2022, at Aventura, Florida.

Eric Rosaler

Eric Rosaler

¹ My firm was instructed to not transmit the funds to finalize the sale for the orders for most of the Defendants so as to avoid adding money to Defendants’ coffers.

SCHEDULE "A"
DEFENDANTS BY NUMBER, STORE ID, AND INFRINGING PRODUCT NUMBER

Defendant Number	Defendant / Store ID	Infringing Product Number
1	21578975	734182976
2	21463472	718726251
3	21723590	741631787
4	21649723	742989861
5	21691090	719467270
6	21704929	718042871
7	21569054	656867373
8	21673049	723599844
9	21724488	731812619
10	21733323	742544576
11	21720353	733944403
12	21699348	744417331
13	21668492	740414746
14	21705143	731829703
15	21523610	728688492
16	21705956	734836216
17	21687797	742786010
18	21680928	718176795
19	21134013	658773966
20	21233849	723432677
21	21599017	654785356
22	21134014	712183648
23	21095734	744539285
24	21640253	659518641
25	21434289	721370257
26	21679693	744269768
27	21705970	743279580
28	21354112	710628252
29	21714142	729490085
30	21161355	736831026
31	21710801	744296147
32	21729736	735468877
33	21715683	734288428
34	21560301	721913211
35	21710887	744309939
36	20899869	717787716
37	21727876	736656733
38	21674464	711161156