

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LVMH SWISS MANUFACTURES SA and
HUBLOT SA,

Plaintiffs,

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A,”

Defendants.

Case No. 22-cv-02666

Judge Andrea R. Wood

Magistrate Judge Maria Valdez

PRELIMINARY INJUNCTION ORDER

Plaintiffs LVMH Swiss Manufactures SA’s and Hublot SA’s (together, “Plaintiffs”) filed a Motion for Entry of a Preliminary Injunction against the fully interactive, e-commerce stores¹ operating under the seller aliases identified in Schedule A to the Complaint and attached hereto (collectively, the “Seller Aliases”). After reviewing the Motion and the accompanying record, this Court GRANTS Plaintiffs’ Motion as follows:

This Court finds Plaintiffs have provided notice to Defendants in accordance with the Temporary Restraining Order entered June 9, 2022 [Dkt. No. 24] (“TRO”), and Federal Rule of Civil Procedure 65(a)(1).

This Court also finds, in the absence of adversarial presentation, that it has personal jurisdiction over the Defendants because Defendants directly target their business activities toward consumers in the United States, including Illinois. Specifically, Plaintiffs have provided a basis to

¹ The e-commerce store urls are listed on Schedule A hereto under the Online Marketplaces and Domain Names.

conclude that Defendants have targeted sales to Illinois residents by setting up and operating e-commerce stores that target United States consumers using one or more Seller Aliases, offer shipping to the United States, including Illinois, accept payment of U.S. dollars and have sold products using infringing and counterfeit versions of Plaintiffs' federally registered trademarks ("Plaintiffs' Trademarks") to residents of Illinois. In this case, Plaintiffs have presented screenshot evidence that each Defendant e-commerce store is reaching out to do business with Illinois residents by operating one or more commercial, interactive internet stores through which Illinois residents can and do purchase products using counterfeit versions of the Plaintiffs' Trademarks. *See* Docket No. 17, which includes screenshot evidence confirming that each Defendant internet stores does stand ready, willing, and able to ship its counterfeit goods to customers in Illinois bearing infringing and/or counterfeit versions of the Plaintiffs' trademarks. A list of the Plaintiffs' Trademarks is included in the below chart.

REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
2,281,436	TAG HEUER	September 28, 1999	For: Clocks, watches and parts thereof in class 014.
5,202,283	TAG HEUER	May 16, 2017	For: soaps; perfumes; cosmetics, creams, and lotions for the body and hair; shampoos; makeup and makeup removers; lipstick; beauty masks; shaving preparations; after-shave lotions and balms; non-medicated toiletries; deodorants for personal use; leather polishes; preservative creams for leather in class 003.

REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
			<p>For: apparatus for recording, transmission, reproduction, or processing of sound or images; electronic timers and timing sensors; calculating machines; equipment for data processing; timing dials and timing sensors; electronic timers; chronographs for use as specialized time recording apparatus; game software; computer operating software for smartwatches and mobile electronic devices; computer software for sending and receiving electronic mail, text messages, data, photographs, and videos; computer software for accessing, browsing, and searching online databases; computer software for sensing, monitoring, recording, displaying, measuring, and transmitting global positioning, direction, distance, altitude, speed, navigational information, weather information, temperature, physical activity level, heart rate, pulse rate, blood pressure, calories burned, steps taken, and biometric data; computer software for tracking and managing information regarding health, fitness, and</p>

REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
			<p>wellness programs; computer peripherals; telephones; tablet computers; MP3 players; smartwatches; wearable computers; smartphones featuring a watch; accessories for computers, telephones, tablet computers, MP3 players, and smartwatches, namely, displays, monitors, protective covers, carrying cases, stands, batteries, battery chargers, headphones, speakers, headsets, microphones, car audio adapters, remote controls, connection cables, power adapters, docking stations, and adapter plugs; spectacles; sunglasses; optical lenses and glasses; spectacle cases; memory cards and integrated circuit cards; downloadable electronic publications in the nature of books, newsletters, catalogs, and brochures in the fields of watches, chronometric instruments, jewelry, apparel, luggage, leather accessories, personal care products, luxury goods, sports, and fashion; electronic sensors, monitors, and displays used to provide and display official time at sporting, cultural, wellness, entertainment, and educational events;</p>



REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
			<p>electronic connected bracelets and connected cuffs for tracking the movement of people that also have a function of transmitting, and/or receiving data to and/or from personal digital assistants, tablets, smart phones and personal computers through internet websites and other computer and electronic communication networks in class 009.</p> <p>For: jewelry; precious stones; horological instruments, namely, watches, wristwatches, and constitutive parts therefor; alarm clocks, clocks and other chronometric instruments, chronometers, chronographs as watches, chronometric apparatus for sports timing, chronometric apparatus for measuring and marking the time; watch bands, watch chains, watch springs, watch dials or watch glasses, watch winders, watch cases being parts of watches, cases and boxes adapted for holding watches; precious metals and their alloys; jewelry cases; boxes of precious metal; key rings, trinkets or fobs of precious metals; cuff links; bracelets; rings; medals; watches that also</p>



REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
			<p>have a function of transmitting and/or receiving data to and/or from personal digital assistants, tablets, smart phones and personal computers through internet websites and other computer and electronic communication networks; watches containing an electronic game function, watches incorporating a telecommunication function; leather boxes adapted for holding watches in class 014.</p> <p>For: passport holders and cases in class 016.</p> <p>For: goods of leather and imitation leather, namely, leather or leatherboard boxes, leather or imitation leather envelopes, travel chests, bags, garment bags for travel, trunks, suitcases, luggage, carrying boxes intended for toiletry articles sold empty, rucksacks, handbags, beach bags, reusable shopping bags, shoulder bags, carrying cases, attaché cases, briefcases, school satchels, under-arm bags, wallets, purses, money pouches, key cases, credit card holders; umbrellas, parasols, sun umbrellas,</p>



REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
			<p>walking sticks in class 018.</p> <p>For: clothing, namely, underwear, sweaters, shirts, bodices, corsets, suits, vests, raincoats, skirts, coats, trousers, jumpers, dresses, jackets, shawls, sashes for wear, scarves, neckties, pocket squares, suspenders, gloves, belts, stockings, tights, socks, singlets, bathing suits and bathrobes; footwear; headwear in class 025.</p> <p>For: retail store services and online retail store services featuring cosmetics, hair care and skin care preparations, perfumes, shaving preparations, toiletries, smartwatches, computers, tablet computers, computer hardware, computer software, computer peripherals, telephones, mobile electronic devices, health, fitness and exercise sensors, monitors and displays, computer gaming machines and electronic games, and accessories for computers, telephones, and mobile electronic devices, sunglasses, spectacles, optical lenses and glasses, spectacle cases, jewelry and precious stones,</p>

REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
			watches, clocks, chronometric instruments, accessories for watches and chronometric instruments, leather goods, leatherware, bags, briefcases, luggage, wallets, purses, umbrellas, clothing, footwear, and headgear; public relations; advertising services for luxury products, namely, cosmetics, perfumes, optical goods, telephones, wearable electronic devices, jewelry, horological products, watches, connected watches, smartwatches, luggage, leatherware, bags, clothing, clothing accessories; business management and organization consultancy in the field of luxury goods in class 035.
2,407,950	TAG HEUER LINK	November 28, 2000	For: Horological instruments and chronometrical instruments, namely watches, wrist-watches, straps for wrist-watches and watch cases, travel clocks, clocks, chronographs for use as watches, chronometers in class 014.
3,569,070	HEUER	February 3, 2009	For: time measuring apparatus and instruments, namely, electronic stop watches, remote control



REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
			<p>miniprinter timers, electronic and manual timers, photocell timers, starting gate timers, telephone liaison timers, impulse distributor timers, electronic pistol starting timers, manual contactor timers, electric time control switches and their parts; cameras, digital audio players and handheld mobile digital electronic devices for use as a digital audio player, and for use as a camera; accessories for handheld mobile digital electronic devices, namely, cases, batteries, chargers, stands in class 009.</p> <p>For: horological and chronometric instruments, namely, watches, watchbands, chronometers, chronographs for use as watches in class 014.</p>
4,868,760	TAG	December 15, 2015	For: Timepieces and chronometric instruments in class 014.
1,435,463	FORMULA 1	April 7, 1987	For: Mechanical watches, and their constituent parts in class 014.
3,046,300	AQUARACER	January 17, 2006	For: Jewelry, precious stones; timepieces and chronometric instruments, namely watches, watchbands,

REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
			chronometers, chronographs for use as watches, clocks in class 014.
1,471,988		January 12, 1988	For: Time measuring instruments, namely, electronic stop watches, remote control mini- printer timers, electronic and manual timers, photocell timers, starting gate timers, telephone liaison timers, impulse distributor timers, electronic pistol starting timers, manual contactor timers in class 009. For: Clocks, watches and parts thereof in class 014. For: Sportswear, namely, parkas in class 025.
2,484,514		September 4, 2001	For: telephone and parts thereof, optical goods, namely spectacles, sunglasses, spectacle frames, spectacles cases in class 009. For: organization of exhibitions for cultural or educational purposes in class 041.

REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
1,222,529		January 4, 1983	For: Watches and Clocks and Parts Therefor; Chronometers; Chronographs; Costume Jewelry and Jewelry Made Wholly or in Part of Precious Metals in class 014.
3,405,702		April 1, 2008	<p>For: Sunglasses, sports eyewear, spectacle frames, spectacle cases in class 009.</p> <p>For: Pencil stands, propelling pencils, roller pens, penholders and pen clips, pens, pen nibs, pen cases, writing materials, namely, inks and pads in class 016.</p> <p>For: Rucksacks, handbags, traveling bags, trunks and suitcases, boxes and cases of leather or imitation leather, valises for personal effects, attache cases, traveling bag sets, briefcases, key cases, business card cases, umbrellas, parasols and walking sticks in class 018.</p>

REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
3,661,145		July 28, 2009	<p>For: Clothing, namely, tee-shirts, shirts, jerseys, pullovers, skirts, trousers, jackets, suits, coats, sashes for wear, ties; footwear, headwear, namely, hats and caps in class 025.</p> <p>For: Tobacco; matches and smokers' articles not made of precious metals, namely, smokers' ashtrays, cigar and cigarette boxes, smokers' lighters, smokers' ashtrays in class 034.</p>
3,787,659		May 11, 2010	For: Movements for clocks and watches in class 014.
3,083,092	BLACK MAGIC	April 18, 2006	For: Jewellery; timepieces and chronometric instruments namely watches used as chronographs, watches used as chronoscopes, chronometers, watches, wristwatches, jewellery watches, diving watches in class 014.
3,149,003	BIG BANG	September 26, 2006	For: Timepieces and chronometric instruments and parts thereof namely watch cases, watch bands, watches used as chronographs, watches used as chronoscopes, chronometers, watches, wristwatches, dress watches, diving watches,

REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
			movements for clocks and watches, movements for watches in class 014.
3,376,234	BIG BANG	January 29, 2008	For: Sunglasses, sports eyewear, spectacle frames, spectacle cases in class 009.
3,814,806	KING POWER	July 6, 2010	For: Jewelry; horological and chronometric instruments, namely, watches, wristwatches, watch bands, dials, clocks, wall clocks, chronometers, chronographs in class 014.
4,140,869	KEY OF TIME	May 15, 2012	For: Jewelry, timepieces and chronometric instruments, namely, watches, wristwatches, watch bands, watch cases, dials, clocks, wall clocks, chronometers, chronographs in class 014.
4,381,674	MAGIC GOLD	August 13, 2013	For: Gold-based alloys and composites thereof and goods made of the aforesaid materials, namely, watches, wristwatches, watch straps, dials for clocks-and watch-making, chronometers, and chronographs for use as timepieces, all the foregoing containing gold in class 014.
4,779,597	FIRMAMENT	July 28, 2015	For: Timepieces and chronometric instruments,

REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
			namely, watches, wristwatches, chronometers, clocks, table clocks, movements for timepieces; jewelry, namely, bracelets, rings, necklaces, earrings, pendants, brooches, cufflinks in class 014.
3,715,561		November 24, 2009	For: Jewellery; horological and chronometric instruments, namely, watches, wristwatches, watchbands, watch cases, dials, clocks, wall clocks, chronometers, chronographs in class 014.
4,916,069		March 15, 2016	For: Jewelry, timepieces and chronometric instruments, namely, watches, wristwatches, watch straps, watch cases, dials for clock-and watch making, clocks, wall clocks, chronometers and chronographs as watches in class 014.

THIS COURT FURTHER FINDS that injunctive relief previously granted in the TRO should remain in place through the pendency of this litigation and that issuing this Preliminary Injunction is warranted under Federal Rule of Civil Procedure 65. Evidence submitted in support of this Motion and in support of Plaintiffs' previously granted Motion for Entry of a Temporary Restraining Order establishes that Plaintiffs have demonstrated a likelihood of success on the

merits; that no remedy at law exists; and that Plaintiffs will suffer irreparable harm if the injunction is not granted.

Specifically, Plaintiffs have proven a *prima facie* case of trademark infringement because (1) Plaintiffs' Trademarks are distinctive marks and are registered with the U.S. Patent and Trademark Office on the Principal Register, (2) Defendants are not licensed or authorized to use any of Plaintiffs' Trademarks, and (3) Defendants' use of Plaintiffs' Trademarks is causing a likelihood of confusion as to the origin or sponsorship of Defendants' products with Plaintiffs. Furthermore, Defendants' continued and unauthorized use of Plaintiffs' Trademarks irreparably harms Plaintiffs through diminished goodwill and brand confidence, damage to Plaintiffs' reputation, loss of exclusivity, and loss of future sales. Monetary damages fail to address such damage and, therefore, Plaintiffs have an inadequate remedy at law. Moreover, the public interest is served by entry of this Preliminary Injunction to dispel the public confusion created by Defendants' actions. As such, this Court orders that:

1. Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with them be preliminarily enjoined and restrained from:
 - a. using Plaintiffs' Trademarks or any reproductions, counterfeit copies or colorable imitations thereof in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine Plaintiffs' Product or not authorized by Plaintiffs to be sold in connection with Plaintiffs' Trademarks;
 - b. passing off, inducing, or enabling others to sell or pass off any product as a genuine Plaintiffs' Product or any other product produced by Plaintiffs, that is not Plaintiffs' or

not produced under the authorization, control or supervision of Plaintiffs and approved by Plaintiffs for sale under Plaintiffs' Trademarks;

- c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control or supervision of Plaintiffs, or are sponsored by, approved by, or otherwise connected with Plaintiffs;
 - d. further infringing Plaintiffs' Trademarks and damaging Plaintiffs' goodwill; and
 - e. manufacturing, shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for Plaintiffs, nor authorized by Plaintiffs to be sold or offered for sale, and which bear any of Plaintiffs' trademarks, including the Plaintiffs' Trademarks, or any reproductions, counterfeit copies or colorable imitations thereof.
2. The domain name registries for the Domain Names, including, but not limited to, VeriSign, Inc., Neustar, Inc., Afiliast Limited, CentralNic, Nominet, and the Public Interest Registry, within seven (7) calendar days of receipt of this Order, shall disable the Domain Names and make them inactive and untransferable until further ordered by this Court.
3. The domain name registrars, including, but not limited to, GoDaddy Operating Company, LLC ("GoDaddy"), Name.com, PDR LTD. d/b/a PublicDomainRegistry.com ("PDR"), and Namecheap Inc. ("Namecheap"), within seven (7) calendar days of receipt of this Order, shall take any steps necessary to transfer the Domain Names to a registrar account of Plaintiffs' selection so that the Domain Names can be redirected or disabled until further ordered by this Court.

4. Upon Plaintiffs' request, any third party with actual notice of this Order who is providing services for any of the Defendants, or in connection with any of the Online Marketplaces and Domain Names, including, without limitation, any online marketplace platforms such as eBay, Inc. ("eBay"), AliExpress, Alibaba Group Holding Ltd. ("Alibaba"), Amazon.com, Inc. ("Amazon"), ContextLogic Inc. d/b/a Wish.com ("Wish.com"), Walmart, Inc. ("Walmart"), and DHgate (collectively, the "Third Party Providers") shall, within seven (7) calendar days after receipt of such notice, provide to Plaintiffs expedited discovery, limited to copies of documents and records in such person's or entity's possession or control sufficient to determine:
 - a. the identities and locations of Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including all known contact information, and all associated e-mail addresses;
 - b. the nature of Defendants' operations and all associated sales, methods of payment for services and financial information, including, without limitation, identifying information associated with the Online Marketplaces, Domain Names, and Defendants' financial accounts, including Defendants' sales and listing history related to their respective Online Marketplaces and Domain Names; and
 - c. any financial accounts owned or controlled by Defendants, including their officers, agents, servants, employees, confederates, attorneys, and any persons acting in active concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation, PayPal, Inc. ("PayPal"), eBay, Alipay, Alibaba, Ant Financial Services Group ("Ant Financial"), Wish.com, Amazon

Pay, Walmart, DHgate, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

5. Upon Plaintiffs' request, those with notice of this Order, including Third Party Providers as defined in Paragraph 4, shall, within seven (7) calendar days after receipt of such notice, disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of counterfeit and infringing goods using the Plaintiffs' Trademarks.
6. Defendants shall be temporarily and preliminarily restrained and enjoined from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
7. Any Third Party Providers, including PayPal, eBay, Alipay, Alibaba, Ant Financial, Wish.com, Walmart, DHgate and Amazon Pay, shall, within seven (7) calendar days of receipt of this Order:
 - a. locate all accounts and funds connected to Defendants' Seller Aliases, Online Marketplaces and Domain Names, including, but not limited to, any financial accounts connected to the information listed in Schedule A hereto; and
 - b. restrain and enjoin any such accounts or funds from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
8. Plaintiffs are authorized to issue expedited written discovery, pursuant to the Federal Rules of Civil Procedure 33, 34 and 36, related to:
 - a. the identities and locations of Defendants, their officers, agents, servants, employees, confederates, attorneys, and any persons acting in active concert or participation with them, including all known contact information, and all associated e-mail addresses; and

- b. the nature of Defendants' operations and all associated sales, methods of payment for services and financial information, including, without limitation, identifying information associated with the Online Marketplaces, Domain Names, and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Online Marketplaces and Domain Names.

Plaintiffs are authorized to issue any such expedited discovery requests via e-mail. Defendants shall respond to any such discovery requests within three (3) business days of being served via e-mail.

- 9. Plaintiffs may provide notice of these proceedings to Defendants, including service of process pursuant to Fed. R. Civ. P. 4(f)(3), and any future motions, by electronically publishing a link to the Complaint, this Order and other relevant documents on a website to which the Domain Names which are transferred to Plaintiffs' control will redirect, or by sending an e-mail to the e-mail addresses for Defendants by third parties that includes a link to said website. The Clerk of the Court is directed to issue a single original summons in the name of "The Partnerships and all other Defendants identified in the Complaint" that shall apply to all Defendants. The combination of providing notice via electronic publication or e-mail, along with any notice that Defendants receive from domain name registrars and payment processors, shall constitute notice reasonably calculated under all circumstances to apprise Defendants of the pendency of the action and afford them the opportunity to present their objections.
- 10. Schedule A to the Complaint [2], Exhibits 5 and 6 to the Declaration of Nicolas Lambert [17] and [18], and the TRO [24] are unsealed.

11. Any Defendants that are subject to this Order may appear and move to dissolve or modify the Order as permitted by and in compliance with the Federal Rules of Civil Procedure and Northern District of Illinois Local Rules. Any third party impacted by this Order may move for appropriate relief.
12. The \$10,000 bond posted by Plaintiffs shall remain with the Court until a Final disposition of this case or until this Preliminary Injunction is terminated.

Dated: July 7, 2022

IT IS SO ORDERED.

A handwritten signature in black ink, appearing to read "Andrea R. Wood", is written over a horizontal line.

Andrea R. Wood
United States District Judge

**LVMH Swiss Manufactures SA and Hublot SA v. The Partnerships and Unincorporated Associations
Identified on Schedule "A" - Case No. 22-cv-02666**

Schedule A

Defendant Online Marketplaces		
No	URL	Name / Seller Alias
1	viyajewelry.en.alibaba	Dongguan Viya Jewelry Co., Ltd.
2	aliexpress.com/store/911969001	99s MMSTRAP Watch Strap Store
3	aliexpress.com/store/900235280	Accessories and watches Store
4	aliexpress.com/store/911047103	Ali Dropship Store
5	aliexpress.com/store/911234115	AliExpress china's shicheng watchband accessories Store
6	aliexpress.com/store/912344556	Beiqiansd Store
7	aliexpress.com/store/911871144	China_WristWatch Store
8	aliexpress.com/store/1890035	china's ZL watch strap Store
9	aliexpress.com/store/912137280	CindaTrade Watch Band Store
10	aliexpress.com/store/2401070	Citytime Watch Factory Store
11	aliexpress.com/store/912133044	feng618 Store
12	aliexpress.com/store/912416738	FreeHao Store
13	aliexpress.com/store/911726027	Greatwatch Store
14	aliexpress.com/store/5246019	HAOCI Store
15	aliexpress.com/store/911123237	HAOCIWATCH Store
16	aliexpress.com/store/5777409	High Quality Watches Store
17	aliexpress.com/store/912456012	highqualitygo Store
18	DISMISSED	DISMISSED
19	aliexpress.com/store/912613483	JS Joint Store
20	aliexpress.com/store/912394764	MART China Store
21	aliexpress.com/store/912618525	Mu Mu's wardrobe Store
22	aliexpress.com/store/912386026	Muspeech. Store
23	aliexpress.com/store/911757972	nanren watch Store
24	aliexpress.com/store/912488133	Noob Watches factory Store
25	aliexpress.com/store/912157396	Northern Lights Watch Strap Store
26	aliexpress.com/store/5883729	Pro Dive Watch Store
27	aliexpress.com/store/912490599	Professional strap Store
28	aliexpress.com/store/2801130	Q Watch Store
29	aliexpress.com/store/912349690	SHIQUHONG Design Store
30	aliexpress.com/store/1100014084	Shop1100014084 Store
31	aliexpress.com/store/5241003	Shop5241003 Store
32	aliexpress.com/store/5381013	Shop5381013 Store
33	aliexpress.com/store/910322294	Shop910322294 Store

34	aliexpress.com/store/910757035	Shop910757035 Store
35	aliexpress.com/store/911114090	Shop911114090 Store
36	aliexpress.com/store/911612416	Shop911612416 Store
37	aliexpress.com/store/912624048	Shop912624048 Store
38	aliexpress.com/store/912625845	Shop912625845 Store
39	aliexpress.com/store/912345059	SHUILIFENG Store
40	aliexpress.com/store/911890010	Small green onion Store
41	aliexpress.com/store/4691025	straps8888 Store
42	aliexpress.com/store/5844048	The Quality Watches Store
43	aliexpress.com/store/912270161	UMQzhongjinghong Store
44	aliexpress.com/store/912424143	World Famou Strap Store
45	aliexpress.com/store/912616054	XWJ exquisite watch accessories Store
46	aliexpress.com/store/910543030	YIFILM Watchband Store
47	aliexpress.com/store/912348530	Zarachiel Watch Store
48	aliexpress.com/store/1090868	ZBL Watchband store
49	aliexpress.com/store/5260139	ZheMiaoDi Store
50	aliexpress.com/store/217871	ZLIMSN Official Store
51	aliexpress.com/store/4686027	jierui Store
52	aliexpress.com/store/911960272	shop6530687 Store
53	aliexpress.com/store/911302164	Shop911302164 Store
54	aliexpress.com/store/912187003	ZGYingsheng Watchband Store
55	aliexpress.com/store/911231063	High Quality Watch & Strap Store
56	dhgate.com/store/21678720	aaaawatches Store
57	dhgate.com/store/20042879	Btime Store
58	dhgate.com/store/21658353	cnc222 Store
59	dhgate.com/store/21661006	gjsreiy68 Store
60	dhgate.com/store/21185882	hebe_wristwatches Store
61	dhgate.com/store/20193993	juancj Store
62	dhgate.com/store/21372036	kaissbeing Store
63	dhgate.com/store/21666712	lqf8688 Store
64	dhgate.com/store/21661030	sahres55 Store
65	dhgate.com/store/21527518	superwatch6688 Store
66	dhgate.com/store/21063092	wx417 Store
67	dhgate.com/store/21074346	yangji_watch Store
68	dhgate.com/store/20151984	yy668 Store
69	dhgate.com/store/21399367	zoechen123 Store-2
70	brand-watches.shop	brand-watches.shop
71	kepttwo.com	kepttwo.com
72	likeluxurygoods.com	likeluxurygoods.com
73	luxurywatcheshut.com	luxurywatcheshut.com
74	newluxury.vip	newluxury.vip

75	opwatches.net	opwatches.net
76	phylliswatch.com	phylliswatch.com

Defendant Domain Names		
No	URL	Name / Seller Alias
77	cheapestluxuryswiss.com	cheapestluxuryswiss.com
78	gmreplica.com	gmreplica.com
79	hotreplicawatches.com	hotreplicawatches.com
80	hubwshop.com	hubwshop.com
81	luxurywatchesdepot.com	luxurywatchesdepot.com
82	oneprices.org	oneprices.org
83	rearwatches.com	rearwatches.com
84	relojdeimitacion.com	relojdeimitacion.com
85	swisswatches.vip	swisswatches.vip
86	taghshop.com	taghshop.com
87	tonewatches.com	tonewatches.com
88	treplicawatches.com	treplicawatches.com
89	worewatches.com	worewatches.com