

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 21-60242-CIV-SMITH**

ADIDAS AG, ADIDAS INTERNATIONAL  
MARKETING B.V., and ADIDAS AMERICA, INC.,

Plaintiffs,

vs.

ANGEL\_SNEAKERS, ACE\_LI a/k/a SPAIN JERSEY, AGOODSHOES,  
AIRMAXPLUS, ALISAHANDBAGS, ALUO854854, ANGEL006,  
ANNEHANDBAGS, APPREL\_WHOLESALE, BAGBAG1688,  
BAICHENGSTORE02, BALSAM\_FZ, BCD7777, BCD8888,  
BEAUTY\_APPREL, BEIZI07, BENZAIED2018, BEST\_JERSEYS\_STORE,  
BIJIBEN, BLUESKY9119, BOAOGO, BSOO, BURBERRY\_NICE1, CAIFU888  
CASUALSHOESS7, CAVENWU, CHANG2019, CHANGJIU998,  
CHEAP\_NK\_SHOES a/k/a AIR MAX STORE, CHEAPFATIONSNEAKER,  
CHENGXINWAIMAO, CHENYUN586, CHILDRENS99, CHINAMENG11,  
CLOTHING19, CLOTHINGWORD888, CLOVER\_1, CLOVER\_2, CLOVER\_3,  
CLOVER\_5, CLOVER\_6, COAT1816, CROCO666, CSHHSPORTSTORE,  
CYHIFW, DALI411, DEESSI, DEMAXIYA111, DESIGNER\_BRAND04,  
DESIGNERMENCLOTHING2, DH\_BALENCIGA, DH\_SHOPS, DHCCGV168,  
DHGATE6889, DHRELIABLESTORE008, DHRELIABLESTORE888,  
DHTOPTOPSTORE008, DIDMORE, DING1203, DISCOUNT23,  
DUODUOQIAN888, DXLING1688, EVE002, FACTORYGOODSY,  
FAGDAA66, FASHIONBAG168, FASHIONGIRL2017, FAVORITES111,  
FEIBA1319, FENGBAO, FOOTBALL1718 a/k/a OM MARSEILLE,  
FREE\_SHIPPING\_SHOP, FTBOY a/k/a FTBOY MEN WOMEN  
SPORTSWEAR, FUZHUANGPEISHI688, FYL0603, GOOD\_FAITH\_SELLER,  
GOODITEM888, GOODMEMORY3219, GOODS2020, GOODSSELL898,  
GST372986, GUANGZHOUYAYA, GUCCI\_9999, GUOYUAN, GYHOME,  
H\_SHOPPY, HAI19881124, HAOYUN202058, HAOYUNLAI588,  
HAPPINESS\_168, HCL1991, HEYGIRL2017 a/k/a PROPC M, HEYWENDY,  
HHFF889, HJKOP12, HOMEANDGARDEN005, HONGDUSHOP,  
HONGZHUANG, HQC603, HUANGSHOPCO, HUANSDGATES,  
HUIFAFA8518, HUQINGFANG0903, HUYU666, HYH8803, HYL168666,  
HZX012, ICEEE, ICEEI, ILOVEYOU899, JERSEY WHOLESALE a/k/a  
JERSEY6868, JINGYANING01, JINGYAXUAN06, JMCOCO,  
JOHNNY\_J1124, JUNRAN2011, KAIXINMLYCHUANYI5151, KANGLE1658  
KDITT, KELLY777, KEMDO, KEMKO, KENGO, KLANG327, LAEO,  
LALAHANDBAGS, LARGE\_WHOLESALE, LASUSU, LATTY3, LAYOO,  
LCL1203, LIANG6789, LIANGQIANWAN2020, LILI20170918, LIN89,  
LINJUN03, LIPING369147, LIQIU20180905, LISABAGS, LIU6624, LIYUN88,  
LKFC7, LM13, LNCYH, LODAAT268, LOGO2020, LOGOBRAND520,  
LOVEBABY666, LOVEMAKEUPS, LQFEN18, LTG8888, LUCKYANDY918,

LUNYONG12, LUXURY886, LUXYRUNIS, M137389691, M946047360, MARA2, MARA33, MARA66, MARA88, MAYERS, MAYTOP1, MBAPPE1108, MENLONGCHANG, MIKAMI, MIMILA, MINGGUANG63, MJT2018, MORNING\_\_SUN05, MV202, NEIMAI, NEWSHIRTS668, NIKECITYLOOP, NIKKAA, NINEGIRLS, NINI22, NONCLEER, NULIONLY, OKOKJERSEY, OUTDOOR\_1, PALME11, PEACE26, PENGSHEN, PIAOXUE2018, PRADDA, PROPLA, QIUYIBAI, QIYE001, QUNYAJI, RAINSTORM1209, RANZEMAOYI, S1688888, SELENA13SHOP, SELL\_CLOTHING, SFHOME, SHASHA136, SHE\_LOVE, SHOESSHOPS a/k/a AIR MAX TN, SJFC1314, SNEAKERS\_\_CLUB, SOCCERSHOP1688, SQUARE1984, STTSHOES, STYLISHCLOTHES2019, SUNJZ, SUNSHINE936 SUPERBRANDCLOTHES, SUPERSELLER666, SUPPLIER\_SHOES, SUPREME2019, SZHOME168, TAI03, TASA11, TERESA959366, TGF72, TH7321998, TIMMYBAGS, TINA920, TKGPPP8, TOPSHOE111 a/k/a SHOESHOME88, TRENDY\_CLOTHES, TUDOR\_ROSE, TURUSSU, UUKAI, VAPORMAXTNSHOES, VOGO\_FASHIONS, VOGO\_GIRLS, VOGO33, VOGO77, VGOBAGS, VGOBCM\_APPREL, VGOBCM\_FZ4, VGOBCM33, WANG1987888, WANG735787950, WANGJ789, WANGXUN985985, WATERDANCE, WEI20208888, WG999, WGLING16, WOAIZUG666, WOERWOFA1818, WOMENHOODIES, WOYAOWOFA1818, WUSHITUO19760911, WUXH2022, WXH186, XIAO0002, XIAO1256, XIAODAN521, XIAOXUANXUAN518, XIATIAN5, XINGLONG198, YA2018888, YANGHUA20181026, YAOYAO369, YAYAHANDBAGS, YEEZUS988, YEEZY350V2V5, YEJISONG1314, YGOOD, YGYKE, YHXIA18, YIFANFENGSHUN2020, YING\_CLOTHING, YING1888, ZCJHCOTSUME, ZGH8888888, ZGQD963, ZHANG369369, ZHANGQ963258, ZHANGXUELIAN, ZHONGGUOQIANG99, ZHONGHUAMENG136, ZHOPEILING\_LOGO, ZHSH20181106, ZJG1446088957, ZJM110, ZJY524, ZJY723, ZLSWF1688, ZXM884, ZXQING36, ZYANFENG, ZYQ97, ZYS824573, ZYW0215, 2MENFASHION, 6MENSTORE, AFT STORE, ALL U LIKE, AMASS, AUTOMATIC, BAIRENBAILE, BEAUTY SHOPPES, BIG RED POUCH, COMBAT ETHNIC, DAGU-WOMEN CLOTHING AND ACCESSORIE 01, FAIRYS WARDROBE, GBJ CO.,LTD.-FOR POPULAR CLOTHES, GLWSHOES2-11, GUOJIADDEBI, HAOYU APPAREL, HX FASHION CLOTHING, IKAI, JE1-WOMENSTORE, KR-PHONE, LDADA, LEMFO WATCH, LUYUN2, MAIJIABAO-WOMEN CLOTHING AND ACCESSORIE, MANYIKEJI JEWELRY & BIJOUTERIE, NEAL YIYI 101Q, NO.1 NK SHOES, PDTOWEB-WOMEN CLOTHING AND ACCESSORIES, PEIGU-WOMEN CLOTHING AND ACCESSORIE, PETSTORE, TIME-SHOP 9, TRENDY WORLD, WHOOSH, YINGYINGYING, YOU ARE BEAUTIFUL, ZYSTYLE, 88D888, ADGDSG, AMANDA KANE, AMOSZV3222, BEST BUY GREATEST, DA DIAMOND KNITTING WORLD, DHK73, ERSENV46, FBOWMAN522, FOOTBALL JERSEY WORLD a/k/a FOOTBALL JERSEY66, GOBEYONDLADYSFASHION, GREENGREEN9, HAPPY ON-LINE STORE, HONGYUNDASTORE, IAJ425, IKO342, ILOVEMYGOODS, JIAOBUQWE, KEXIN520, KIDS-DIYU, KYLAMERSLEY, LA REVANCHA,

LENZYLKA4232, LHM0112, LIANGZUOMINGS, LUCY WORLD168, LYFJ9695, MANUFACTURING INDUSTRY, NELOW454, NGELAHP35, NIAGA4322, OLAQ, ONEKACV57, POTYGV, QR, REREREQW, RIAHVROG999, RONGJINXIU, ROSALYN.STYLE, ROWDY TREADWAY, RTONTR533, SCRU2663, SENICTO456T, SPORT SHOP ITA, STEVENTGOMERY, STRANGE HOUSE, WHITE.RICE, WORLD FASHION SUPER MARKET, YNEALBRY878, ZHANGJIANJUN, ZHANGSHUAI3, ABBY CD, CHENGHUAQUQINGQIANXINSHANGMAOBU, HOPU ZHIYUAN (TIANJIN) INVESTMENT MANAGEMENT CO. LTD., NO1\_SHOP, WEISHANXIAZHENRUIZEBAIHUODIAN, YUNTANGXIAOFANG, ZHANG ORIENTAL SHOP, BAKARIN DROPSHIPPING STORE, DOLOIAVOL STORE, DONNAJASMINE STORE, FANTASY WORLD FACTORY STORE, FENGLING STORE, GYSPORT STORE, HANDAISHA STORE, LENTHIMEN LENTHIMEN STORE, LU KU STORE, NASPORT FACTORY STORE, NIGENG APPAREL STORE, PANPANDEYIHOU STORE, REEBOZO OFFICIAL STORE, SHOP5372234 STORE, SHOP5742031 STORE, SHOP910974016 STORE, SHOP910982009 STORE, SHOP911068084 STORE, WAHSHE STORE, WORLDEXPRESS STORE, YOUR-LIFE STORE, YUTWPEZ DROPSHIPPING STORE, ACEWIS&RAIMENT STORE, BONJEAN WOMEN'S APPAREL STORE, CHALLENGER ALLIANCE STORE, CHUANGLEMEI STORE, FAFX STORE, MFXMC SEAZON STORE, SHOP5231008 STORE, ST & AM STORE TFU OFFICIAL STORE, WONDLOUM STORE, XBIBI STORE, AGAS6480-343, CAKEM\_65, CHERRY-BLOSSOM918, FULLBUY9818, HHCO.STORE, KAIJUN7911, LUDEHUA666, ROSE\_STREET, SINO\_BUTTERFLY, VCV20563, WENBRA\_JM0YSRZ, ZIXUANJUN201602, ADIDASREALBOOST.COM, ADIDASYEEZYSHOESTORE.COM, ARTEMISOUTLET.CN, JERSEYSFANSHOP.COM, SHOEOUT.RU, SHOPADIDASSHOES.COM, SHOPYEEZYS.COM, SNEAKERSPOP.ORG, SOCCERFAIRY.COM, VIPSHOESPRO.COM, VIPUNIFORMSONLINE.COM, WOWFIFA.COM, YEEZREEL.COM, YEEZYSS.COM, YZYSNEAKERS.ORG ZENRICK.COM, and THECHECKSHOES.COM, each an Individual, Partnership, or Unincorporated Association,

Defendants.

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**AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF**

Plaintiffs, adidas AG, adidas International Marketing B.V., and adidas America, Inc., (collectively "Plaintiffs"), hereby sue Defendants, the Individuals, Partnerships, 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

distributing goods within this district using counterfeits and confusingly similar imitations of Plaintiffs' trademarks through various Internet based e-commerce stores and fully interactive commercial websites operating using the seller identities and domain names set forth on Schedule "A" hereto (the "Seller IDs and 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, and 1125(a) and (d), and 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 direct business activities toward and conduct business with consumers throughout the United States, including within the State of Florida through at least the Internet based e-commerce stores and fully interactive commercial websites accessible in Florida and operating under the Seller IDs and Subject Domain Names.

3. Venue is proper in this Court pursuant to 28 U.S.C. § 1391 since Defendants are, upon information and belief, aliens engaged in infringing activities and causing harm within this district by advertising, offering to sell, selling and/or shipping 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, CLIMALITE Mark, CLIMAWARM Mark, CLIMACOOOL Mark, BOOST Mark, STAN SMITH Mark, and CLIMACHILL 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 bearing the distinctive **adidas**,  ,  , Three-Stripe Mark, THE BRAND WITH THE 3 STRIPES Mark, CLIMALITE Mark, CLIMACOOOL Mark, BOOST Mark, STAN SMITH Mark, CLIMACHILL Mark, ADIDAS NEO Mark, NMD Mark, ULTRABOOST Mark, SPLY-350 Mark, and SUPERSTAR Mark. adidas AG, adidas International, and adidas America shall be referred to herein collectively as “adidas.”

7. Plaintiffs’ goods are sold through various channels of trade within the State of Florida, including this district. Defendants, through the sale and offer to sell counterfeit and

infringing versions of Plaintiffs' branded products, are directly, and unfairly, competing with Plaintiffs' economic interests in the State of Florida and causing Plaintiffs harm within this jurisdiction.

8. Like many other famous trademark owners, Plaintiffs suffer ongoing daily and sustained violations of their 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 across their ecommerce stores. The natural and intended byproduct of Defendants' actions is the erosion and destruction of the goodwill associated with Plaintiffs' names and associated trademarks and the destruction of the legitimate market sector in which they operate.

9. 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 in order to protect both consumers and themselves from the adverse effects of confusion and erosion of the goodwill embodied in Plaintiffs' brands.

### **THE DEFENDANTS**

10. Defendants are individuals, partnerships, and/or business entities of unknown makeup, each of whom, upon information and belief, either reside and/or operate in foreign jurisdictions, or redistribute products from the same or similar sources in those locations and/or ship their goods from the same or similar sources in those locations to consumers as well as

shipping and fulfillment centers within the United States. Defendants have the capacity to be sued pursuant to Federal Rule of Civil Procedure 17(b). Defendants target their business activities toward consumers throughout the United States, including within this district through the simultaneous operation of the Internet e-commerce stores via Internet marketplace websites under the Seller IDs or the fully interactive commercial websites under the Subject Domain Names.

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

12. Defendants are the past and/or present controlling forces behind the sale of products bearing counterfeits and infringements of Plaintiffs' trademarks as described herein using at least the Seller IDs and Subject Domain Names.

13. Defendants directly engage in unfair competition with Plaintiffs by advertising, offering for sale, and selling goods bearing counterfeits and infringements of one or more of Plaintiffs' trademarks to consumers within the United States and this district through Internet based e-commerce stores or commercial websites using, at least, the Seller IDs and Subject Domain Names and additional names, seller identification aliases, and domain names not yet known to Plaintiffs. Defendants have purposefully directed some portion of their illegal activities towards consumers in the State of Florida through the advertisement, offer to sell, sale and/or shipment of counterfeit and infringing branded versions of Plaintiffs' goods into the State.

14. Defendants have registered or purchased, and maintained the Seller IDs and Subject Domain Names. Defendants may have engaged in fraudulent conduct with respect to the registration of the Seller IDs and Subject Domain Names by providing false and/or misleading

information during the registration or maintenance process related to their respective Seller IDs and Subject Domain Names. Upon information and belief, many Defendants have registered and/or maintained their Seller IDs and Subject Domain Names for the sole purpose of engaging in unlawful and infringing and counterfeiting activities.

15. Defendants will likely continue to register or acquire new seller identification aliases and domain names, as well as related payment accounts, for the purpose of selling and offering for sale goods bearing counterfeit and confusingly similar imitations of Plaintiffs' trademarks unless preliminarily and permanently enjoined.



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

17. Defendants' business names, i.e., the Seller IDs and Subject Domain Names, associated payment accounts, and any other alias seller identification names and domain names used in connection with the sale of counterfeit and infringing goods bearing one or more of Plaintiffs' trademarks are essential components of Defendants' unlawful online activities and are one of the means by which Defendants further their scheme and cause harm to Plaintiffs. Moreover, Defendants are using Plaintiffs' famous names and/or trademarks to drive Internet consumer traffic to their e-commerce stores and websites operating under the Seller IDs and Subject Domain Names, thereby increasing the value of the Seller IDs and Subject Domain Names and decreasing the size and value of Plaintiffs' legitimate marketplace at Plaintiffs' expense.











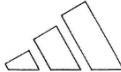
**COMMON FACTUAL ALLEGATIONS**







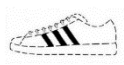

**adidas’s Trademark Rights**


18. 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, CLIMALITE Mark, CLIMACOOOL Mark, BOOST Mark, STAN SMITH Mark, CLIMACHILL Mark, ADIDAS NEO Mark, NMD Mark, ULTRABOOST 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.

19. 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:

<b>Trademark</b>	<b>Registration Number</b>	<b>Registration Date</b>	<b>Class / Goods</b>
	0,870,136	May 27, 1969	IC25. Athletic Training Suits.
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.

	1,253,013	October 4, 1983	IC 025. Sportswear-namely, (( suits, shorts, pants, tights, shirts, jerseys, socks, gloves, jackets, coats, swim wear, sweaters, caps, pullovers, warmup suits, [ rain suits, ski suits, ] jump suits, )) (( boots, shoes )) (( and slippers ))
<b>adidas</b>	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.
CLIMALITE	1,809,301	December 7, 1993	IC 025. Shirts.
	1,815,956	January 11, 1994	IC 25. athletic footwear
	1,833,868	May 3, 1994	IC 25. athletic footwear
	2,016,963	November 19, 1996	IC 025. Sports and leisure wear, namely jackets.
	2,058,619	May 6, 1997	IC 025. Sports and leisure wear, namely shirts
	2,179,796	August 11, 1998	IC 025. sports and leisure wear, namely shorts, pants, shirts, T-shirts, jerseys, tights, socks, gloves, jackets, swimwear, sweaters, caps and hats, pullovers, warm-up suits, rain-suits, ski suits, jump suits, boots, slippers, sandals, specific purpose athletic shoes, and general purpose sport shoes

	2,278,589	September 21, 1999	IC 025. athletic and leisure footwear.
	2,278,591	September 21, 1999	IC 25. sports and leisure wear, namely, shorts.
	2,284,308	October 12, 1999	IC 025. sports and leisure wear, namely pants.
	2,411,802	December 12, 2000	IC 018. All purpose sport bags, athletic bags, traveling bags, backpacks, knapsacks. 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. IC 028. Sports balls and playground balls; guards for athletic use, namely, shin guards, knee guards and leg guards.
CLIMACOOOL	2,651,581	November 19, 2002	IC 025. Clothing, namely, footwear, sport shoes, headwear, shirts, T-shirts, jerseys, underwear, swimwear, shorts, pants, skirts, sweaters, caps, hats, visors, warm up suits, rain suits, ski suits, jumpsuits, boots, sandals, sweat shirts, jackets, uniforms, wrist bands and head bands, gloves and socks.
	3,029,127	December 13, 2005	IC 025. Clothing, namely, T-Shirts, sweatshirts, jackets and coats.
	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> <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.</p>
<b>adidas</b>	3,255,820	June 26, 2007	<p>IC 018. Bags for general and sport use, namely, handbags, tote bags, waist packs, overnight bags, gym bags, duffel bags, backpacks, knapsacks, beach bags, trunks, suitcases and travelling bags, wallets, briefcases, key cases, purses, parasols and umbrellas.</p>
<b>BOOST</b>	3,580,958	February 24, 2009	<p>IC 025. Clothing, namely, shirts; footwear.</p>
<b>STAN SMITH</b>	3,590,187	March 17, 2009	<p>IC 025. Footwear.</p>
<b>CLIMACHILL</b>	4,585,788	August 12, 2014	<p>IC 025. Footwear; apparel, namely, shirts, tops, shorts.</p>

ADIDAS NEO	4,863,315	December 1, 2015	IC 018. Bags, namely, backpacks, tote bags, messenger bags, drawstring bags, shoulder bags, handbags, duffel bags, shopping bags made of denim and canvas in whole or in part, weekender bags, beach bags, bum bags, hobo bags, pouches made of denim, plastic and nylon in whole or in part; all-purpose carrying bags. IC 025. Footwear; apparel, namely, tops, bottoms, shirts, sweaters, jackets, vests, coats, pants, trousers, shorts, skirts, dresses, jumpsuits, swimwear, socks, scarves, gloves, belts; headwear
NMD	5,218,628	June 6, 2017	IC 025. Footwear.
ULTRABOOST	5,357,883	December 19, 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 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.”

20. 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.

21. 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, James Harden, and Andrew Wiggins, NFL stars Von Miller, Aaron Rodgers, Dak Prescott, NHL star Sidney Crosby, 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.

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

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

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

25. 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.

26. 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 has become increasingly important to adidas's overall marketing and consumer education efforts. Thus, adidas expends significant monetary resources on Internet marketing and consumer education, including search engine optimization ("SEO") strategies. Those strategies allow adidas and its authorized retailers to fairly and legitimately educate consumers about the value associated with the adidas Marks and the goods sold thereunder. Similarly, Defendants' individual seller stores and websites are indexed on search engines and compete directly with adidas for space in the search results.

#### **Defendants' Infringing Activities**

27. In blatant disregard of Plaintiffs' rights, Defendants are promoting, advertising, distributing, selling and/or offering for sale goods in interstate commerce using counterfeits and confusingly similar imitations of the adidas Marks (the "Counterfeit Goods") through at least the Internet based e-commerce stores or commercial websites operating under the Seller IDs and Subject Domain Names. Specifically, Defendants are using the adidas Marks to initially attract online consumers and drive them to Defendants' ecommerce stores operating under the Seller IDs and Subject Domain Names. Defendants are using identical copies of one or more of the adidas Marks for different quality goods. Plaintiffs have used the adidas Marks extensively and continuously before Defendants began offering counterfeit and confusingly similar imitations of Plaintiffs' merchandise.

28. 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 the adidas 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.

29. Defendants advertise their e-commerce stores and websites, including their Counterfeit Goods, to the consuming public via at least the e-commerce stores and websites under the Seller IDs and Subject Domain Names. In so advertising their stores and products, Defendants improperly and unlawfully use one or more of the adidas Marks without authority.

30. Most Defendants are, upon information and belief, employing and benefitting from substantially similar, advertising and marketing strategies based, in large measure, upon an illegal use of counterfeits and infringements of the adidas Marks. Specifically, Defendants are using counterfeits and infringements of Plaintiffs' famous names or trademarks in order to make their e-commerce stores and 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 the



adidas Marks, and/or (iii) increasing Plaintiffs' overall cost to market their goods and educate consumers about their brands via the Internet.

31. 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.

32. At all times relevant hereto, Defendants in this action have had full knowledge of Plaintiffs' ownership of the adidas Marks, including their, exclusive rights to use and license such intellectual property and the goodwill associated therewith.

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

34. 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.

35. 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, the public, and the trade into believing there is a connection or association between Plaintiffs' genuine goods and Defendants' Counterfeit Goods, which there is not.

36. Moreover, at least Defendant Numbers 429–431 have registered their 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”).

37. Defendant Numbers 429–431 have registered and/or used the Cybersquatted Subject Domain Names with the bad faith intent to profit from Plaintiffs’ Marks.

38. 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.

39. Upon information and belief, Defendant Numbers 429–431 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.

40. Defendant Numbers 429–431 have never used the Cybersquatted Subject Domain Names in connection with a bona fide offering of goods or services.

41. Defendant Numbers 429–431 have not made any bona fide non-commercial or fair use of Plaintiffs’ Marks on a website accessible under the Cybersquatted Subject Domain Names.

42. Defendant Numbers 429–431 have intentionally incorporated Plaintiffs’ Marks in their Cybersquatted Subject Domain Names to divert consumers looking for Plaintiffs’ Internet websites to its own Internet websites for commercial gain.

43. Given the visibility of Defendants’ various e-commerce stores and websites and the similarity of their actions, 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 they operate as a result of Defendants' concurrent actions.

44. 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.

45. Defendants' payment and financial accounts, including but not limited to those specifically set forth on Schedule "A," are being used by Defendants to accept, receive, and deposit profits from Defendants' trademark counterfeiting and infringing and unfairly competitive activities connected to their Seller IDs and Subject Domain Names and any other alias seller identification names or domain names used or controlled by them.

46. Further, Defendants are likely to transfer or secret their assets to avoid payment of any monetary judgment awarded to Plaintiffs.

47. Plaintiffs have no adequate remedy at law.

48. Plaintiffs are suffering irreparable injury and have suffered substantial damages because of Defendants' unauthorized and wrongful use of the adidas Marks.

49. 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.

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

50. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 49 above.

51. This is an action for trademark counterfeiting and infringement against Defendants based on their use of counterfeit and confusingly similar imitations of the adidas

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

52. Specifically, Defendants are promoting and otherwise advertising, selling, offering for sale, and distributing products using counterfeits and/or infringements of one or more of the adidas Marks. Defendants are continuously infringing and inducing others to infringe the adidas Marks by using one or more of them to advertise, promote, offer to sell, and/or sell counterfeit and infringing branded goods.

53. 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.

54. Defendants' unlawful actions have caused and are continuing to cause unquantifiable damages to Plaintiffs and are unjustly enriching Defendants with profits at Plaintiffs' expense.

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

56. 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))**

57. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 49 above.

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

59. Defendants' Counterfeit Goods bearing, offered for sale, and sold using copies of one or more of the adidas 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.

60. 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 into commerce with full knowledge of the falsity of such designations of origin and such descriptions and representations, all to Plaintiffs' detriment.

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

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

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

64. 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 Defendant Numbers 429–431 only)**

65. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 49 above.

66. Defendant Numbers 429–431 have acted with the bad faith intent to profit from the adidas Marks and the goodwill associated with the adidas Marks by registering and using the Cybersquatted Subject Domain Names.

67. The adidas Marks were distinctive and famous at the time Defendant Numbers 429–431 registered the Cybersquatted Subject Domain Names.

68. The Cybersquatted Subject Domain Names are identical to, confusingly similar to or dilutive of one or more of the adidas Marks.

69. Defendant Numbers 429–431's conduct is done with knowledge and constitutes a willful violation of Plaintiffs' rights in the adidas Marks. At a minimum, Defendants' conduct constitutes reckless disregard for and willful blindness to Plaintiffs' rights.

70. Defendant Numbers 429–431's actions constitute cybersquatting in violation of §43(d) of the Lanham Act, 15 U.S.C. §1125(d).

71. Plaintiffs have no adequate remedy at law. Plaintiffs have suffered and will continue to suffer irreparable injury and damages due to Defendant Numbers 429–431’s above described activities if Defendant Numbers 429–431’s are not preliminarily and permanently enjoined. Additionally, Defendant Numbers 429–431’s will continue to wrongfully profit from their illegal activities

**COUNT IV - COMMON LAW UNFAIR COMPETITION**

72. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 49 above.

73. This is an action against Defendants based on their promotion, advertisement, distribution, sale, and/or offering for sale of goods using or bearing marks which are virtually identical to one or more of the adidas Marks in violation of Florida’s common law of unfair competition.

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

75. Defendants’ infringing activities are likely to cause and actually are causing confusion, mistake, and deception among members of the trade and the general consuming public as to the origin and quality of Defendants’ ecommerce stores as a whole and all products sold therein.

76. 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**

77. Plaintiffs hereby adopt and re-allege the allegations set forth in Paragraphs 1 through 49 above.

78. 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 bearing one or more of the adidas Marks. Plaintiffs are the owners of all common law rights in and to the adidas Marks.

79. Specifically, Defendants are promoting and otherwise advertising, distributing, offering for sale, and selling goods using and bearing infringements of one or more of the adidas Marks.

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

81. 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**

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



a. Entry of temporary restraining order, as well as preliminary and permanent injunctions pursuant to 15 U.S.C. § 1116 and Federal Rule of Civil Procedure 65 enjoining Defendants, their agents, representatives, servants, employees, and all those acting in concert or participation therewith, from manufacturing or causing to be manufactured, importing, advertising or promoting, distributing, selling or offering to sell their Counterfeit Goods; from infringing, counterfeiting, or diluting the adidas Marks; from using the adidas Marks, or any mark or design similar thereto, in connection with the sale of any unauthorized goods; from using any logo, trade name or 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 the adidas 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 a temporary restraining order, as well as 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 of the adidas Marks.

c. 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, the top level domain (TLD) Registry for each of the Subject Domain Names or their administrators, including backend registry operators or administrators, place the Subject Domain Names, and any other domains names being used and/or controlled by Defendants to engage in the business of marketing, offering to sell, and/or selling goods bearing counterfeits and infringements of the adidas Marks, 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 used by Defendants, to the IP addresses where the associated websites are hosted.

d. Entry of an order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, 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 the adidas Marks, to Plaintiffs' control so they may no longer be used for illegal purposes.

e. 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, the applicable governing Internet marketplace website operators and/or administrators for the Seller IDs who are provided with notice of an injunction issued by the Court disable and/or cease facilitating access to the Seller IDs, and any other alias seller identification names being used and/or controlled by Defendants

to engage in the business of marketing, offering to sell and/or selling goods bearing counterfeits and infringements of the adidas Marks.

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 for the Seller IDs, who are provided with notice of an injunction issued by the Court identify any e-mail address known to be associated with Defendants' respective Seller ID.

g. 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 who are provided with notice of an injunction issued by the Court permanently remove from the multiple platforms, which include, inter alia, a Direct platform, Group platform, Seller Product Management platform, Vendor Product Management platform, and Brand Registry platform, any and all listings and associated images of goods bearing counterfeits and/or infringements of the adidas Marks via the e-commerce stores operating under the Seller IDs, and upon Plaintiffs' request, any other listings and images of goods bearing counterfeits and/or infringements of the adidas Marks associated with and/or linked to the same sellers or linked to any other alias seller identification names being used and/or controlled by Defendants to promote, offer for sale and/or sell goods bearing counterfeits and/or infringements of the adidas Marks.

h. 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, Defendants and any Internet marketplace website operators and/or administrators who are provided with notice of an injunction issued by the Court, immediately cease fulfillment of and sequester all goods of each

Defendant bearing one or more of the adidas Marks in its inventory, possession, custody, or control, and surrender those goods to Plaintiffs.

i. 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.

j. Entry of an order requiring Defendant Numbers 429–431 to account to and pay Plaintiffs for all profits and damages resulting from Defendant Numbers 429–431'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 Defendant Numbers 429–431 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.

k. 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.

l. Entry of an order that, upon Plaintiffs' request, Defendants and any financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, and their related companies and affiliates, identify and restrain all funds, up to and including the total amount of judgment, in all financial accounts and/or sub-accounts used in connection with the Seller IDs and Subject Domain Names or other alias seller

identification or e-commerce store names, domain names, and/or websites used by Defendants presently or in the future, as well as any other related accounts of the same customer(s) and any other accounts which transfer funds into the same financial institution account(s), and remain restrained until such funds are surrendered to Plaintiffs in partial satisfaction of the monetary judgment entered herein.

- m. Entry of an award of pre-judgment interest on the judgment amount.
- n. Entry of an order for any further relief as the Court may deem just and

proper.

DATED: March 4, 2021.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **Virgilio Gigante**\_\_\_\_\_

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**SCHEDULE "A"**  
**DEFENDANTS BY NUMBER, SELLER ID, SUBJECT DOMAIN NAME, FINANCIAL  
ACCOUNT INFORMATION, INFRINGING PRODUCT NUMBER, AND E-MAIL**

<b>Defendant Number</b>	<b>Defendant / Seller ID / Subject Domain Name</b>	<b>Financial Account Information: Payment Account/Store Number</b>	<b>Infringing Product Number / E-mail Address</b>
1	angel_sneakers	21546116	561846801
2	Ace_li a/k/a Spain Jersey	20677251	402554388
3	Agoodshoes	21074361	442649366
4	Airmaxplus	21097796	464564924
5	Alisahandbags	20747103	418087010
6	Aluo854854	21180652	472123180
7	angel006	21124960	526170492
8	Annehandbags	20747371	434723308
9	apprel_wholesale	20731381	536965852
10	bagbag1688	21207432	554129395
11	baichengstore02	21050139	462927399
12	balsam_fz	20996160	536965923
13	Bcd7777	21129191	524383098
14	Bcd8888	21094981	439013080
15	beauty_apprel	20731344	536965874
16	Beizi07	21307641	567047932
17	benzaied2018	21078684	554634305
18	Best_jerseys_store	21208608	466751860
19	Bijiben	21167412	515322352
20	Bluesky9119	21228401	471328546
21	Boaogo	21413722	518731409
22	bsoo	21092684	536965602
23	burberry_nice1	21561936	567048169
24	Caifu888	20479241	464162769
25	Casualshoess7	21541792	554051064
26	Cavenwu	21344661	541400423
27	Chang2019	21221028	456907466
28	Changjiu998	21222844	491032677
29	Cheap_nk_shoes a/k/a Air Max Store	20213389	398896535
30	cheapfationsneaker	21075699	512732676
31	Chengxinwaimao	14770515	506042202
32	Chenyun586	21195209	538554646
33	childrens99	21156320	552532179
34	chinameng11	21185783	587437480
35	Clothing19	21222630	506502358
36	Clothingword888	20588166	406825490

37	Clover_1	21230141	488089127
38	Clover_2	21230383	561721778 491801410
39	Clover_3	21251021	491335650
40	Clover_5	21257403	512221298
41	Clover_6	21263654	491159220
42	Coat1816	21157444	518547888
43	Croco666	21221043	530705054
44	cshhsportstore	21050713	462744089
45	cyhifw	20993058	431282416
46	dali411	21262969	565349262
47	Deessi	21227286	469747475
48	demaxiya111	21550757	556039210
49	designer_brand04	20969041	548823820
50	designermenclothing2	21562145	583004811
51	dh_balenciga	21227245	448633274
52	dh_shops	21201686	561396939
53	Dhccgv168	21297112	493206472 508806556
54	Dhgate6889	21398446	516986346
55	dhreliablestore008	21211147	555975846
56	Dhreliablestore888	21211150	553795745
57	dhtoptopstore008	21211633	554149455
58	Didmore	21281010	514603764
59	ding1203	21094262	569422671
60	Discount23	21083184	434074767
61	Duoduoqian888	20749341	406279016
62	dxling1688	21152310	487520828
63	eve002	20999621	458781786
64	factorygoodsy	21572306	607335409
65	Fagdaa66	21318178	501302984
66	Fashionbag168	21411072	508648211
67	Fashiongirl2017	20739388	507314111
68	favorites111	21476817	549774699
69	Feiba1319	21205769	533970812
70	Fengbao	14268827	470004548
71	Football1718 a/k/a OM Marseille	20754456	414802501
72	Free_shipping_shop	20827295	480375680
73	Ftboy a/k/a Ftboy Men Women Sportswear	20965685	489589756
74	Fuzhuangpeishi688	21382698	504153647
75	fyl0603	21531651	547641112

76	Good_faith_seller	21112244	458060173
77	Gooditem888	21416730	521956325
78	goodmemory3219	20604768	488807201
79	goods2020	21595455	599079301
80	Goodsell898	20820063	530116559
81	gst372986	21084989	531711527
82	Guangzhouyaya	21292440	474940190
83	gucci_9999	21567594	569388175
84	Guoyuan	14498638	248819896
85	Gyhome	21155948	459249064
86	H_shoppy	20974049	542530362
87	Hai19881124	21264615	500471168
88	Haoyun202058	21461173	531937499
89	Haoyunlai588	20826078	453630003
90	happiness_168	21115992	465460844
91	hcl1991	21542599	556623042
92	Heygirl2017 a/k/a Propc M	20738925	503901967
93	Heywendy	21000885	412490844
94	Hhff889	20821710	509148251
95	Hjkop12	21199456	451239452
96	homeandgarden005	21389564	562017634
97	Hongdushop	21226615	472950633
98	Hongzhuang	20031362	464069879
99	Hqc603	21531656	547641536
100	huangshopco	21576911	581512464
101	huansdgates	21572783	590972360
102	huifafa8518	21442135	557770923
103	huqingfang0903	21193711	511736476
104	Huyu666	21073368	490884710
105	hyh8803	21566235	566847865
106	hyl168666	21432357	519968264
107	hzx012	21155912	431408072
108	Iiceee	21227493	472796324
109	iiceei	21227670	489258259
110	Iloveyou899	21202996	515786545
111	jersey wholesale a/k/a jersey6868	21188249	487679966
112	Jingyaning01	20699491	453159128
113	Jingyaxuan06	21081473	504154408 504318232
114	Jmcoco	21096634	429092610
115	johnny_j1124	21588223	594041928
116	junran2011	21415563	513452145



117	kaixinmlychuanyi5151	21575265	577960668
118	Kangle1658	21226617	490889139
119	Kditt	21442683	526837422
120	Kelly777	20929107	411695294
121	Kemdo	21105649	452434891
122	Kemko	21105333	431174029
123	kengo	21105655	548823919
124	Klang327	21427064	515692983
125	Laeo	21105618	526081438
126	Lalahandbags	20747378	458179779
127	Large_wholesale	15311054	465987861
128	lasusu	21105306	556480161
129	Latty3	20941903	563114419
130	layoo	21105626	548824054
131	Lcl1203	21431135	515796128
132	Liang6789	20939609	556998540
133	liangqianwan2020	21593756	604364855
134	Lili20170918	20796482	553060621
135	Lin89	21151920	553553196
136	Linjun03	21282691	510910435
137	Liping369147	21028392	448983303
138	Liqiu20180905	21112967	466340850
139	Lisabags	21059450	420725435
140	liu6624	21068786	582182171
141	Liyun88	21176403	447473296
142	Lkfc7	21161688	528413404
143	Lm13	21436009	519711981
144	Lncyh	21217728	457065465
145	Lodaat268	20683611	464920625
146	Logo2020	21404280	549650784
147	Logobrand520	21219466	532060486
148	Lovebaby666	21422593	521930276
149	Lovemakeups	21223544	529121380
150	Lqfen18	21298640	514436274
151	ltg8888	21085949	582183635
152	Luckyandy918	21109475	430310794
153	lunyong12	20805249	525915625
154	Luxury886	21023183	443877085 423479033
155	luxyrunis	21576686	585602909
156	M137389691	20984214	518391618
157	m946047360	20520733	555447680
158	Mara2	21247335	496657426

159	Mara33	21259265	500596210
160	Mara66	21268389	500510930
161	Mara88	21287520	501657810
162	Mayers	20787065	491186504
163	maytop1	21562703	564928918
164	Mbappel108	21104072	472850372
165	Menlongchang	20652872	498479252
166	mikami	21442281	526563325
167	Mimila	21141994	431173729
168	Mingguang63	21090318	419189602
169	Mjt2018	21126228	467882409
170	Morning_sun05	21039257	473360224
171	Mv202	21218040	448574472
172	neimai	20325560	586721206
173	Newshirts668	21461593	527726408
174	nikecityloop	21051850	539786328
175	Nikkaa	21142072	449487781
176	Ninegirls	20740770	439148398
177	Nini22	20431388	448981244
178	Noncleer	21154267	432641691
179	nulionly	21565641	572954475
180	Okokjersey	21475247	550198815
181	Outdoor_1	21065269	499246349
182	palme11	21505970	559009443
183	peace26	21155992	527779618
184	pengshen	21187408	606645978
185	piaoxue2018	21213815	470457065
186	pradda	21155801	535460613
187	Propla	21227108	454770941
188	qiuyibai	21205884	563760413
189	qiye001	21410313	600630911
190	qunyaji	21191651	528255858
191	Rainstorm1209	21283743	519751714
192	Ranzemaoyi	21176469	504259792
193	s1688888	21210010	589257505
194	selena13shop	21245303	517657644
195	Sell_clothing	21396239	501310241
196	sfhome	20991769	553832556
197	Shasha136	21195452	566496439
198	she_love	21069195	536965805
199	Shoeshops a/k/a Air Max Tn	21268488	506167576
200	sjfc1314	20735854	563762209

201	Sneakers__club	21530317	546755788
202	Soccershop1688	21290904	488271107
203	square1984	21135324	555109712
204	sttshoes	21282267	527708686
205	Stylishclothes2019	21538475	565749756
206	sunjz	20979446	582631324
207	Sunshine936	20629447	492459901
208	superbrandclothes	21216872	555406729
209	Superseller666	20956636	540666998 469883591
210	Supplier_shoes	20752306	409180684
211	supreme2019	21224080	511762696
212	szhome168	21027196	553069895
213	Tai03	19914226	558612287
214	Tasa11	21409573	516830911
215	Teresa959366	21091344	419708015
216	Tgf72	20758345	504188355
217	th7321998	21050653	524990232
218	Timmybags	21128201	427820700
219	Tina920	20732705	475334444 494723066
220	tkgppp8	21083782	571666772
221	Topshoe111 a/k/a Shoeshome88	21106181	468850134
222	Trendy_clothes	21300927	501064027
223	Tudor_rose	14030983	468284423
224	Turussu	21442662	526201683
225	uukei	21227486	536966210
226	vapormaxtnshoes	21097946	554006219
227	Vogo_fashions	20740778	505985291
228	Vogo_girls	20740487	505988938
229	Vogo33	20889574	419738335
230	vogo77	20889582	531733527
231	Vogobags	20747089	421941371
232	Vogocm_apprel	20731127	509755844
233	Vogocm_fz4	20726066	505697118
234	vogocm33	20899933	536966269
235	Wang1987888	21421495	512057526
236	wang735787950	20371265	559495811
237	Wangj789	21085064	487975260
238	Wangxun985985	21452150	521765848
239	waterdance	21260028	517665580
240	wei20208888	21555045	558259441

241	Wg999	20983515	474110875
242	wgling16	21180637	557805308
243	Woaizug666	20813682	554868706
244	Woerwofa1818	21019461	516406517
245	Womenhoodies	21012347	556969222
246	Woyaowofa1818	21151960	513877901
247	wushituo19760911	21589411	592854350
248	Wuxh2022	21022011	460683593
249	wxh186	20281651	497354762
250	Xiao0002	19919070	442497634
251	Xiao1256	21099458	454019073
252	xiaodan521	20986390	564243842
253	Xiaoxuanxuan518	21276305	519478205
254	Xiatian5	20745677	536453605
255	xinglong198	21211460	593352477
256	Ya2018888	20994184	419299300
257	Yanghua20181026	21155111	430758115
258	Yaoyao369	20770395	431834413
259	Yayahandbags	20747112	448571787
260	Yeezus988	20508339	440397543
261	Yeezy350v2v5	21298947	502473309
262	yejisong1314	20469782	460568806
263	Ygood	14348123	401999762
264	ygyke	21458775	552191355
265	Yhxia18	21263431	488962010
266	yifanfengshun2020	21438143	531311808
267	Ying_clothing	21414847	537153791
268	Ying1888	21098017	466053977
269	Zcjhcotsume	21106801	471540713
270	Zgh888888	21022545	434815345
271	Zgqd963	21227351	564635840
272	Zhang369369	21378747	561988752
273	Zhangq963258	21026513	431344569
274	zhangxuelian	21226052	527101887
275	Zhongguoqiang99	21185482	565619622
276	zhonghuameng136	21223600	584866101
277	Zhoupeiling_logo	21238201	532063257
278	Zhsh20181106	21162595	447944201
279	zjg1446088957	21567267	601625324
280	Zjm110	21176745	488106980
281	Zjy524	21057730	489271533
282	Zjy723	21175665	461219706
283	Zlswf1688	21421866	511878104

284	Zxm884	21094479	434944923
285	zxqing36	21084199	566427079
286	zyanfeng	21016455	412347141
287	Zyq97	21435193	554490225
288	Zys824573	21084419	529510225
289	Zyw0215	21223094	487974800
290	2MenFashion	5afa54c58b4513036343401c	5ede0653931d0a010643ca90
291	6MenStore	5b779eb31436d40369d37e58	5ebca77f7239d80106b5bdfa
292	AFT Store	5d9aefb928fc7103014bc62c	5db170748b451301010785d3
293	All U like	1502332026407359213-249-3-709-2409498463	5eed7e2a57cb54010603e84f
294	Amass	5d58f4518b2c370301f832d8	5eddb1551436d401015976ec
295	Automatic	5cbfd4561436d4030157ce81	5d75b2661436d401010e9d97
296	BAIRENBAILE	5e5c5ef88b451303016ea0a8	5f16aefdc4aec501060ae630
297	Beauty Shoppes	5bbb2fd48b2c37032b7ef47c	5f55a3dcfba2f70106d8d378
298	Big red pouch	5cb6e81128fc7103014b888e	5dd26a758b2c370101683726
299	Combat ethnic	1496386409382900693-3-3-26193-3040673518	5f23ae7d8ba824010661b2b7
300	Dagu-Women Clothing and Accessorie 01	5c3bf2986ecda803011e246b	5eafb22f8b2c3701011be4b5
301	Fairys Wardrobe	5f1e7d2ab3ce9e0306427020	5f324c82f77bd80106907e44
302	GBJ Co.,Ltd.-for popular clothes	5dd3a17f8b2c3703018db5a6	5ed5a5bc1436d401018918f2
303	Glwshoes2-11	5b62f2de8b2c3703ce33395c	5e7c6d0c8b45130101a4e356
304	GUOJIADEBI	5e5c5eee8b2c370301a643df	5f0523439f24aa01066fa78d
305	Haoyu Apparel	5afb8168b2c370317f4c81e	5b07a5c88b2c37015e02a138
306	HX Fashion Clothing	5d6f26358b2c37030125de1f	5dbfc0ed8b2c37010120f43a
307	IKAI	1496204220264739778-142-3-26193-286691226	5f3a464b807944010644b297
308	JE1-WomenStore	5aff82b48b451303c9b6e5f8	5ea2beef385aec0106b1341d
309	KR-phone	5d64d5ee8b45130301af86ad	5f361bfff07f8010601498a
310	Ldada	5b28f46b8b451303afb503f3	5cc2b10b6ecda80101e65f9e
311	LEMFO WATCH	1513251218219048432-54-3-26193-2647060314	5d8c6a0136b54d01017e6663
312	luyun2	5bc15dcd28fc71030c574a94	5cc50ba228fc7101014ed675
313	maijiabao-Women Clothing and Accessorie	5c3beff36ecda803011b7550	5eafb1468b2c3701011bb9de
314	Manyikeji Jewelry & bijouterie	5c21869036b54d0301bd7275	5eafb1cb1436d40101fe20af
315	Neal yiyi 101Q	5aee59668b4513038336e461	5f06b90cf63a370106ebe8db
316	NO.1 NK shoes	5f3b33eb2efc410306aa0ae5	5f3b50d135e7e201069e2bdd
317	pdtoweb-Women Clothing and Accessories	5c42dd4c8b2c370301a7ad52	5eafb2128b2c3701011bde3d

318	peigu-Women Clothing and Accessorie	5c2739191436d40301002b9b	5eafb2508b451301013a4f4b
319	petstore	5baef9291436d403ac673e3a	5f33d77c595f82010652cd15
320	Time-Shop 9	5bd3d4118b451303a08b7463	5f422f3670522e0106dd920a
321	Trendy World	1481092230207056811-134-3-629-34491268	5f2ccbd428ff850106722c91
322	whoosh	5d108bd028fc710301422e3b	5ec225f58b451301019e40a8
323	yingyingying	1519287985595566570-168-3-709-4052532329	5d6e0ab728fc71010104dd57
324	You are beautiful	1509437340924121558-208-3-26193-1583242102	5f2baa387623410106761f02
325	zstyle	5b32edf98b4513034f55af77	5d2439616ecda8010115b10f 5d134a561436d4010144ac0f
326	88D888	5e8fd4b81e4b080ae64bb860	5f107ee8afdb5e8a4fb146bf
327	adgdsg	5e5cc50d2861d5df78278e1a	5e69ea4226b8b64e3542f6f0
328	Amanda Kane	5f58c9bbb68efb4b9351d9b1	5f6cb1431cda1f005afa321e
329	amoszv3222	5e6719875890243b7213f674	5f326e5127ae0e20705cdf3c
330	Best Buy Greatest	5e54fa76bf4d4d87dc8b9e3b	5e6f74ae1e198575022352e1
331	Da Diamond Knitting world	5ef29e54a25e690ff3133c67	5f1474a42497e44fbef5106f 5fc228d5d859829db53102b9
332	dhk73	5f0865f0a7d2ebcaciaa780c	5f146a0cfc6450411125dac
333	ersenv46	5e9ab7092405fb61dcc4a440	5f3cf6cd7022d25622630a3e
334	fbowman522	5e683120c6a6e61905be7779	5f33e41c67b218ba0ee68e56
335	Football Jersey World a/k/a Football Jersey66	5f65e4992f66f39d3f951fcb	5f6c076a1a7b72004491b4d8
336	gobeyondladysfashion	5822d12c6a1ede26a65cf65a	5e684822d11d412216f1bf06 5e466e442fb80855e2fa4c4a
337	GreenGreen9	5f2c28638c7e95151c94555d	5f32420e16bdacce25cead6e
338	Happy On-Line Store	5510129c4210290cf1b096d3	5dd77ef3f1d101bf946ff64d
339	hongyundastore	58466d7dc0874068ce1eb21a	5e4504a7d5738e41fab57444
340	ijaj425	5e6837275c68181500cfc294	5f33f31e915b6a9c5ac99ebd
341	iko342	5e6833fe9145ad1b26972f03	5f33eaa2915b6a827ac99c10
342	ilovemygoods	577fcb894bcf159e530d6a3	598c0d1e7841f5117c857c68
343	jiaobuqwe	5e67305a3cce5a56edf6feaa	5ef571fea0466e23f2133fc7
344	Kexin520	5e27060580bef81e154d8ec3	5e88c5770d6b44a01e29fba8
345	kids-DIYU	58fa4121eb47192c7d950f25	5e676f29bd473e8dd1b97e6c
346	Kylamersley	5e9812c058532f164d9cdc18	5f1dab0f29e7862d1ea9c0af
347	La Revancha	5ea3ddcea5ae3c0ba26c0922	5ea3e09160b3cf55f33ab115
348	lenzylka4232	5e6500421c32cb706e119f5c	5f7c75aa3f3b8a80536b9544
349	lhm0112	5ecfba61ff8f3c20001ee7fd	5f29a5cfcfa5bf15df8b230c
350	liangzuomings	5f38f8c9d2f98876b6ef7471	5f5b8aae819e7a22118ee8dc
351	Lucy World168	5ef2e122ffea3b6b443b57e7	5f11b0d4c6afa279bfa42324 5fe54a1e9f11510055ae7536
352	lyfj9695	5e9a427f2405fb28b3c4a435	5f4633e80d7720407d443a3e

353	manufacturing industry	584abbafe3476b08a3a3f242	5e4f8a0e99058917400326c2
354	nelow454	5e9ac036f5b57c4d78119335	5f3d233122e78c9099d0072e
355	ngelahp35	5e9ac628f5255436b1a2b110	5f3d38a11357a376034a7152
356	niaga4322	5e67197c48763f477fd534c3	5f3272888c56e90058ebf684
357	Olaq	5f7669fb2fe6b7001aab6de5	5f993e3cfe0bfa034895ea2f
358	onekacv57	5e9abb5e25c3d4231656b7aa	5f3cff6ec0428cbb79f61887
359	potygv	5d8c34432888351f401e7260	5ed39caa76cb210c0ed6b994
360	QR	57d3c726a47d914aaf5af6a6	5d5389ad1ccd7c3579ac2fa2
361	rerereqw	5d412750fe55c81e2ce29866	5da1b410c88c224efcff4f61
362	riahvrog999	5e67371a48763f5897d54a15	5f339aed5e19d7683ab080ef
363	rongjinxiu	58aed549db4bd107637855ba	5cfe2859c37439073d12e6a3
364	rosalyn.style	5f2e0c2ade457eee94e04a7e	5f42046a01a0aa0056f97e3b
365	Rowdy Treadway	5f57a626cc3cbc413facc6af	5f76cf93cd70c9f540c3f3c5
366	rtontr533	5e6838c218426d1e5ab9bdd2	5f33f5662807432dcfa7877b
367	scru2663	5e6831299145ad0bc0973949	5f33e8047f7f18e2bae28709
368	senicto456t	5e9abd33a42593be1898a776	5f3d1c0b0ea12614cc9b14f6
369	Sport Shop Ita	5e9f55df0de11a9c59be17ab	5f365890e194eaf0bc4824c4
370	Steventgomery	5e9eacc9632b2bd9b5609a11	5f1db02929e7866215a9c016
371	Strange House	58d5fc24a04a28537bf98501	5e50c6fb883c9b3d39eeac67
372	white.rice	5f2e0f77987d1388d8ffb3d1	5f42052b80c0dca4707df962
373	World Fashion Super Market	58a5b1858557757e75bca7f2	59917625931c0d350303a695
374	ynealbry878	5e6731e0813c3f003db9f620	5f32bd93bf0c37004c085e14
375	zhangjianjun	583eeb56f097ec1b8a861212	59ac125eec9eeb191e56b502 59b4d9c10a0a7b509b522eef 5a499e64a2ef5510f471d7be
376	zhangshuai3	597767e1b771730bd72b718d	5f02bb50c784c907a7444e46
377	Abby Cd	A1FE5WZQ16G9JV	B083K39LCZ
378	chenghuaquqingqianxinshangmaobu	A32IY2T08U0864	B089B131VH
379	Hopu Zhiyuan (Tianjin) Investment Management Co. Ltd.	A1NGGQRUR30UQT	B089W975LF B089WC11HK B089W9PYXX
380	No1_shop	A3WU75SIR1JZM	B07JFRXH7H
381	weishanxiashenruizebaihuodian	A1CCREIWBJEW6C	B08KFH9SD7 B08KFDH8T5
382	yuntangxiaofang	ALGJOFYZDI66M	B087JSY7T3 B087JR2WZG B087J8ZG5W
383	zhang Oriental Shop	AY6OOE4Q3P0AA	B07ZC2CKYJ
384	BaKaRin Dropshipping Store	5734020	4000901710457
385	Doloiavol Store	4642054	33003430775
386	DonnaJasmine Store	1873501	32876088619

387	Fantasy World Factory Store	5083005	4000513043342
388	fengling Store	5375071	4000346766597
389	GYsport Store	5376263	4000909658691
390	HanDaisha Store	5073352	4000022858551
391	LENTHIMEN LENTHIMEN Store	2967024	4000804151065
392	Lu Ku Store	4503072	4001071816264
393	NASPORT FACTORY Store	910364019	4001352373407
394	NiGeng apparel Store	5797537	4001152299207
395	Panpandeyihou Store	3223069	32839006657
396	reebozo Official Store	2343337	4000285763937 4000153965889 4000153430430
397	Shop5372234 Store	5372234	4000615832388
398	Shop5742031 Store	5742031	1005001283071634
399	Shop910974016 Store	910974016	1005001646092694
400	Shop910982009 Store	910982009	1005001701052689
401	Shop911068084 Store	911068084	1005001705888321
402	WAHSHE Store	5595352	1005001288860132
403	WorldExpress Store	5886524	4001242386167
404	Your-life Store	5017149	32998186203
405	Yutwpez Dropshipping Store	4821006	33008254262
406	ACEWIS&RAIMENT Store	langqadianshang@163.com Store No: 4997258	4000972364723
407	BONJEAN Women's Apparel Store	langlangyunshang@126.com Store No.: 1110135	4001131900396
408	Challenger Alliance Store	185511164@qq.com Store No.: 5881111	20000003877501
409	ChuangLeMei Store	nbnessm@163.com Store No.: 4474051	33054261685
410	FXFX Store	1393765578@qq.com Store No.: 2957025	32919888882
411	MFXMC SEAZON Store	524852223@qq.com Store No.: 4513021	4000410381723
412	Shop5231008 Store	xnyzlsq@163.com Store No.: 5231008	4000134185821
413	ST & AM Store	17621065381@163.com Store No.: 5002216	4000535521338
414	TFU Official Store	zengtaitiger@126.com Store No.: 5480093	1005001402717352
415	WONDLOUM Store	185511164@qq.com Store No.: 3089069	1005001382426209



416	Xbibi Store	416283064@qq.com Store No.: 5296004	4000980269390
417	agas6480-343	dw622211@163.com	203063035966 203051548809
418	cakem_65	chencomeagain@163.com	353176197829
419	cherry-blossom918	huaxiajingpin666@163.com	263401217397 253193698073
420	fullbuy9818	chencomeagain@163.com	313176417853
421	hhco.store	haziemusulaiman89@gmail.com	183652631342
422	kaijun7911	chencomeagain@163.com	293602198679
423	ludehua666	shinefuture2018@outlook.com	402321213017
424	rose_street	pforpower@yahoo.com	223200587480
425	sino_butterfly	victoria.art8@hotmail.com	382953213137
426	vcv20563	wrt898f@163.com	124107045200
427	wenbra_jm0ysrz	uavelrr@hotmail.com	174214014179
428	zixuanjun201602	celineyi@163.com	224049239825
429	adidasrealboost.com	contactus@asiaoutlet.com	mystyle0607@hotmail.com
430	adidasyeezyshoestore.com	ganhongyupp@outlook.com	adidasservice@outlook.com
431	artemisoutlet.cn	zhanghai4954ming@outlook.com	
432	jerseysfanshop.com	landonvet314@mail.com	jerseys@smailu.com
433	shoeout.ru	Kenigb6u3r@gmail.com	shoeout86@gmail.com shoeout@hotmail.com
434	shopadidasshoes.com	purnimatsuzyb@gmail.com	orders@customerservicebest.com
435	shopyeezys.com	gupinxiongdeha@126.com	
436	Sneakerspop.org	buypopsneaker@gmail.com	buypopsneakers@gmail.com
437	soccerfairy.com	1030059232@qq.com	admin@soccerfairy.com
438	vipshoespro.com	jakaa.smith@gmail.com oullouremj@gmail.com	
439	vipuniformsonline.com	LashayBarret85752@mail.com	jerseys@smailu.com
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