

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

VORTEX, INC.,

PLAINTIFF,

v.

THE PARTNERSHIPS AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON SCHEDULE "A,"

DEFENDANTS.

CIVIL ACTION NO: 1:22-cv-04189

JUDGE GARY FEINERMAN

DECLARATION OF JEFF LEUNG

1. I am an attorney at law, duly admitted to practice *pro hac vice* before the United States District Court for the Northern District of Illinois. I am one of the attorneys for Plaintiff Vortex, Inc. Except as otherwise expressly stated to the contrary, I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify as follows:

2. On October 17, 2022, I served via electronic mail the Defaulting Defendants (as defined in the accompanying Memorandum in Support of Plaintiff's Motion for Entry of Default and Default Judgment) with a copy of the Summons, Complaint, and TRO in this action and advised the Defaulting Defendants in that correspondence that copies of the same were available on the website located at <https://www.afslaw.com/case-no-22-cv-04189>.

3. The Defaulting Defendants have failed to answer or otherwise plead in this action within the allotted time in violation of Federal Rule of Civil Procedure 12(a)(1)(A).

4. My firm, with assistance from our client and those assisting our client, investigated the infringing activities of the Defaulting Defendants, including attempting to identify the owner

or each of the associated e-commerce store operating under the Seller Aliases and its contact information. Our investigation confirmed that the Defaulting Defendants are primarily, or exclusively, domiciled in China. As such, I am informed and believe that none of the Defaulting Defendants are active duty members of the U.S. armed forces.

5. Exhibit 1 to this declaration is an accurate copy of unpublished decisions cited in the accompanying Memorandum in Support of Plaintiff's Motion for Entry of Default and Default Judgment.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: November 17, 2022

Respectfully submitted,

/s/ Jeff Leung_____

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Attorneys for Plaintiff

Exhibit 1

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

Burberry Limited et al)	Case No: 14 C 8220
)	
v.)	Judge: John W. Darrah
)	
The Partnerships & Unincorp.))	
Associations Identified on)	
Schedule "A")	

ORDER

Status hearing and ruling on motion hearing held. Plaintiff's motion for entry of default is granted [41]. Enter order. Civil case closed.

(T:) 00:05

Date: 12/11/14

/s/ Judge John W. Darrah

cc

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

BURBERRY LIMITED, a United Kingdom)
corporation, and BURBERRY LIMITED, a New)
York corporation,)

Plaintiffs,)

v.)

THE PARTNERSHIPS and)
UNINCORPORATED ASSOCIATIONS)
IDENTIFIED ON SCHEDULE "A,")

Defendants.)

Case No. 14-cv-8220

Judge John W. Darrah

Magistrate Judge Geraldine Soat Brown

FINAL JUDGMENT ORDER

This action having been commenced by Plaintiffs Burberry Limited, a United Kingdom corporation ("Burberry UK"), and Burberry Limited, a New York corporation ("Burberry US"), together, "Burberry" or "Plaintiffs," against the Partnerships and Unincorporated Associations identified on Amended Schedule A attached hereto (collectively, the "Defendants"), and using the Defendant Domain Names and Online Marketplace Accounts (collectively, the "Defendant Internet Stores");

This Court having entered upon a showing by Burberry, a temporary restraining order and preliminary injunction against Defendants which included a domain name transfer order and asset restraining order;

Burberry having properly completed service of process on Defendants, the combination of providing notice via electronic publication or email, along with any notice that Defendants received from domain name registrars and payment processors, being notice reasonably

calculated under all circumstances to apprise Defendants of the pendency of the action and affording them the opportunity to answer and present their objections; and

None of the Defendants identified in Amended Schedule A attached hereto (collectively, the "Defaulting Defendants") having answered the Complaint or appeared in any way, and the time for answering the Complaint having expired;

THIS COURT HEREBY FINDS that Defaulting Defendants are liable for willful federal trademark infringement and counterfeiting (15 U.S.C. § 1114), false designation of origin (15 U.S.C. § 1125(a)), cybersquatting (15 U.S.C. § 1125(d)) and violation of the Illinois Uniform Deceptive Trade Practices Act (815 ILCS § 510, et seq.).

IT IS HEREBY ORDERED that Plaintiffs' Motion for Entry of Default and Default Judgment is GRANTED in its entirety, that Defaulting Defendants are deemed in default and that this Final Judgment is entered against Defaulting Defendants.

IT IS FURTHER ORDERED that:

1. Defaulting 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 permanently enjoined and restrained from:
 - a. using Burberry's BURBERRY 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 Burberry Product or not authorized by Burberry to be sold in connection with Burberry's BURBERRY Trademarks;
 - b. passing off, inducing, or enabling others to sell or pass off any product as a genuine Burberry Product or any other product produced by Burberry, that is not Burberry's

- or not produced under the authorization, control or supervision of Burberry and approved by Burberry for sale under Burberry's BURBERRY Trademarks;
- c. committing any acts calculated to cause consumers to believe that Defaulting Defendants' products are those sold under the authorization, control or supervision of Burberry, or are sponsored by, approved by, or otherwise connected with Burberry;
 - d. further infringing Burberry's BURBERRY Trademarks and damaging Burberry's goodwill;
 - e. otherwise competing unfairly with Burberry in any manner;
 - f. 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 Burberry, nor authorized by Burberry to be sold or offered for sale, and which bear any of Burberry's BURBERRY Trademarks or any reproductions, counterfeit copies or colorable imitations thereof;
 - g. using, linking to, transferring, selling, exercising control over, or otherwise owning the Online Marketplace Accounts, the Defendant Domain Names or any other domain name or online marketplace account that is being used to sell or is the means by which Defaulting Defendants could continue to sell Counterfeit Burberry Products; and
 - h. operating and/or hosting websites at the Defendant Domain Names and any other domain names registered or operated by Defaulting Defendants that are involved with the distribution, marketing, advertising, offering for sale, or sale of any product bearing the BURBERRY Trademarks or any reproductions, counterfeit copies or

- colorable imitations thereof that is not a genuine Burberry Product or not authorized by Burberry to be sold in connection with Burberry's BURBERRY Trademarks.
2. The Defendant Domain Names are permanently transferred to Burberry's control. The domain name registries for the Defendant Domain Names, including, but not limited to, VeriSign, Inc., Neustar, Inc., Afilias Limited, CentralNic, Nominet and the Public Interest Registry, within three (3) business days of receipt of this Order, shall unlock and change the registrar of record for the Defendant Domain Names to a registrar of Burberry's selection, and the domain name registrars shall take any steps necessary to transfer the Defendant Domain Names to Burberry's account at a registrar of Burberry's selection.
 3. Those in privity with Defendants and with actual notice of this Order, including any online marketplaces such as iOffer, social media platforms, Facebook, YouTube, LinkedIn, Twitter, Internet search engines such as Google, Bing and Yahoo, web hosts for the Defendant Domain Names, and domain name registrars, shall within three (3) business days of receipt of this Order:
 - a. disable and cease providing services for any accounts through which Defaulting Defendants engage in the sale of counterfeit and infringing goods using the BURBERRY Trademarks, including any accounts associated with the Defaulting Defendants listed on Amended Schedule A attached hereto;
 - b. disable and cease displaying any advertisements used by or associated with Defaulting Defendants in connection with the sale of counterfeit and infringing goods using the BURBERRY Trademarks; and

- c. take all steps necessary to prevent links to the Defendant Domain Names identified on Amended Schedule A from displaying in search results, including, but not limited to, removing links to the Defendant Domain Names from any search index.
4. Pursuant to 15 U.S.C. § 1117(c)(2), Burberry is awarded statutory damages from each of the Defaulting Defendants in the amount of two million dollars (\$2,000,000) for willful use of counterfeit BURBERRY Trademarks on products sold through at least the Defendant Internet Stores.
5. Western Union shall, within two (2) business days of receipt of this Order, permanently block any Western Union money transfers and funds from being received by the Defaulting Defendants identified in Amended Schedule A.
6. PayPal, Inc. ("PayPal") shall, within two (2) business days of receipt of this Order, permanently restrain and enjoin any China or Hong Kong based accounts connected to Defaulting Defendants, Defaulting Defendants' Online Marketplace Accounts or Defaulting Defendants' websites identified in Amended Schedule A from transferring or disposing of any money or other of Defaulting Defendants' assets.
7. All monies currently restrained in Defaulting Defendants' financial accounts, including monies held by PayPal, are hereby released to Burberry as partial payment of the above-identified damages, and PayPal is ordered to release to Burberry the amounts from Defaulting Defendants' PayPal accounts within ten (10) business days of receipt of this Order.
8. Until Burberry has recovered full payment of monies owed to it by any Defaulting Defendant, Burberry shall have the ongoing authority to serve this Order on PayPal in the

event that any new PayPal accounts controlled or operated by Defaulting Defendants are identified. Upon receipt of this Order, PayPal shall within two (2) business days:

- a. Locate all accounts and funds connected to Defaulting Defendants, Defaulting Defendants' Online Marketplace Accounts or Defaulting Defendants' websites, including, but not limited to, any PayPal accounts;
- b. Restrain and enjoin such accounts or funds that are China or Hong Kong based from transferring or disposing of any money or other of Defaulting Defendants' assets; and
- c. Release all monies restrained in Defaulting Defendants' PayPal accounts to Burberry as partial payment of the above-identified damages within ten (10) business days of receipt of this Order.

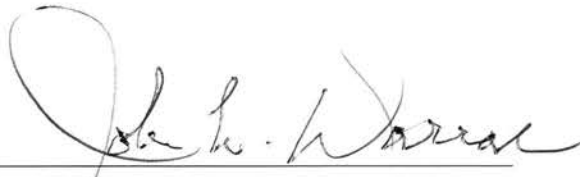
9. Until Burberry has recovered full payment of monies owed to it by any Defaulting Defendant, Burberry shall have the ongoing authority to serve this Order on any banks, savings and loan associations, or other financial institutions (collectively, the "Financial Service Providers") in the event that any new financial accounts controlled or operated by Defaulting Defendants are identified. Upon receipt of this Order, the Financial Service Providers shall within two (2) business days:

- a. Locate all accounts connected to Defaulting Defendants, Defaulting Defendants' Online Marketplace Accounts or Defaulting Defendants' websites;
- b. Restrain and enjoin such accounts from receiving, transferring or disposing of any money or other of Defaulting Defendants' assets; and
- c. Release all monies restrained in Defaulting Defendants' financial accounts to Burberry as partial payment of the above-identified damages within ten (10) business days of receipt of this Order.

10. In the event that Burberry identifies any additional online marketplace accounts, domain names or financial accounts owned by Defaulting Defendants, Burberry may send notice of any supplemental proceeding to Defaulting Defendants by email at the email addresses identified in Amended Schedule A attached hereto.
11. The ten thousand dollar (\$10,000) cash bond posted by Burberry, including any interest minus the registry fee, is hereby released to Burberry or its counsel, Greer Burns & Crain, Ltd. The Clerk of the Court is directed to return the cash bond previously deposited with the Clerk of the Court to Burberry or its counsel by check made out to the Greer Burns & Crain IOLTA account.

This is a Final Judgment.

DATED: December 11, 2014



U.S. District Court Judge John W. Darrah

Burberry Limited, a United Kingdom corporation, and Burberry Limited, a New York corporation v. The Partnerships and Unincorporated Associations Identified on Schedule "A" Case No. 14-cv-8220

Amended Schedule A

Defendant Domain Names

No.	Domain Name
1	burberry-india.biz
2	burberry-handbags-uk.biz
3	australia-burberry.biz
4	usa-burberry-handbags.biz
5	canada-burberry.biz
6	ukburberryoutlet.biz
7	burberry-singapore.biz
8	burberryfactoryoutletusa.biz
9	binti.biz
10	tastyrecipes.biz
11	dailystock.biz
12	joyousbuy.cn
13	burberryscarf.co
14	replicabagshome.co
15	replicaburberryscarf.co.uk
19	inburberry.co.uk
21	florist-romford.co.uk
22	buymmlv.co.uk
23	idolreplicas.co.uk
24	robertsbridgehall.co.uk
25	paypsl.co.uk
27	stylecapture.co.uk
29	bagsoutlet.co.uk
30	dorodigital.co.uk
31	michian.co.uk
32	celticdance.co.uk
33	rajpauljewellers.co.uk
34	lancasterchryslerjeep.co.uk
35	replicahandbags-uk.co.uk
36	replicabagsgood.co.uk
37	doshopsell.com
38	burberry-outletonline.com
39	burberry-outletinc.com

40	burberryhandbags2014.com
41	womennewburberry.com
42	kobburberrytaske.com
43	burberrysaldiborse.com
44	burberry-mall.com
45	burberrypaschersolde.com
46	shopdiscountburberry.com
47	burberryvenditaitalia.com
48	burberryclassicbags.com
49	jpburberrybag.com
50	burberry-clothingsale.com
51	kobburberrykvinder.com
52	burberryretailshop.com
53	burberrysretail.com
54	xn--burberrykbenhavn-txb.com
55	burberryoutletpro.com
56	burberryoutletonlines2014.com
57	burberryfactoryoutlets2014.com
58	outletonline-burberry.com
59	discountburberrystore.com
60	burberryshows.com
61	buycheapburberryonline.com
62	shopburberryshoes.com
63	shopburberrysale.com
64	okcheapburberry.com
65	burberrysalemall.com
66	burberryonlinestore.com
67	cheapburberryvipsale.com
68	fashionburberryshirts.com
69	achatventeburberry.com
70	buynewburberry.com
71	shopcheapburberry.com
72	burberrylocations.com
73	burberrysstoreonline.com
74	burberrybagsforsale.com
75	wholesaleburberry.com
76	burberryonsalestore.com
77	burberrysalenow.com
78	burberrywomen.com
79	burberryoutletonline2014.com
80	burberryfactory2015.com

81	burberrydubai.com
82	cheapburberryoutletsstore.com
83	handel-de.com
84	luxuryzsale.com
85	sacfendisoldes.com
86	uomotimberland.com
87	doudounenorthfacevente.com
88	findbagss.com
89	bagsoutletretail.com
90	handbags-greece.com
91	thehandbagsforcheap.com
92	canada-goose-paris.com
93	spaccioborsedonna.com
94	jeans-germany.com
95	ralphlaurenpolopris.com
96	classicdiscountshats.com
97	botteshommes.com
98	danmarktisalg.com
99	northfaceparisfrance.com
100	topfashionscarf.com
101	buberrybagscheapsale.com
102	tiffanyoutlet-store.com
103	handtaschen-de.com
104	newbagsstore2014.com
105	myfashiononlinestore.com
106	magasindoudounepascher.com
107	imarquefr.com
108	fashionikeshoes.com
109	luxurybagsfashion.com
110	goleathermall.com
111	modatimberlandonline.com
112	marquesensolde.com
113	2014luxurybags.com
114	interlineagency.com
115	fashionshopping888.com
116	1flag.com
117	bbsbroadcaster.com
118	sundaysline.com
119	loudsbags.com
120	menlinda2014us.com
121	tangmirbags.com

122	ladygagamall.com
123	cheapcoatfr.com
124	muffler-shawl-scarf.com
125	prixtimberland.com
126	doudounes-magasin.com
127	discountwomenbags.com
128	venditastivaliuomo.com
129	taschendamens-schweiz.com
130	womensbagsretail.com
131	vesker-norway.com
132	tilkvinnerogvesker.com
133	lovebuyoakleys.com
134	terminatetickets.com
135	handbagscm.com
136	binocshop.com
137	marquescle.com
138	sacmarquemagasin.com
139	amodait.com
140	beerducate.com
141	sacmodeluxe.com
142	infomonnaie.com
143	lovevida.com
144	iskconkl.com
145	replicahandbagshow.com
146	replicadesignerhandbags4u.com
147	likehandbagsonline.com
148	babyclotheswholesalers.com
149	blackmerpompa.com
150	handbags-belts-mall.com
151	marquelinks2014.com
152	newmarquekey.com
153	newmarqueskey.com
154	newmarquesweb.com
155	newmarquesite.com
156	freshpickups.com
157	horancorak.com
158	lvmarts.com
159	onlinelong.com
160	brand-hot-sale.com
161	soldespaschere.com
162	favouritebagcollection.com

163	outlethandbagsale.com
164	jewefashion.com
165	shoppingbagsvip.com
166	begsvip2014.com
167	luxufocus.com
168	eshopclothes.com
169	cheapbagsmall.com
170	cheaphandbagswomen.com
171	borsevenditamilano.com
172	chemisebelgique.com
173	greekwomenhandbags.com
174	topsneakerworld666.com
175	borseoutlet2014.com
176	handbagshomeonline.com
177	sacfemmesolde.com
178	discountbeltforsale.com
179	bestreplicahandbag2.com
180	discountclassicbelt.com
181	bagsonline2014.com
182	myloveshoppingmall.com
183	taschensaleshop.com
184	discounthandbagsshow.com
185	bberry2014outlet.com
186	borseoutletdonna.com
187	watchshopok.com
188	bagsus2u.com
189	riverladycruises.com
190	perfectpensale.com
191	perfectbagsale.com
192	forfelixrocksites.com
193	marke-cl.com
194	orchardcheckbags.com
195	christiandiorhandbags.com
196	ventefrmarque.com
197	yeahropa.com
198	watcheselife.com
199	outlets london.com
200	online-brandshop.com
201	handbaguk.com
202	lvmensbags.com
203	decentheels.com

204	goodguystransmissions-ny.com
205	topmybag.com
206	hervedresses2012.com
207	jerseyfr.com
208	shoxtnmall.com
209	cheaptnmall.com
210	salediscountbag.com
211	cheapestwholesaleoutlets.com
212	eshop2015.com
213	burebags.com
214	buybaggujp.com
215	buycheapsneakeronline.com
216	shopcheapsneaker.com
217	cheapbrandtshirt.com
218	jiayi506.com
219	epibags.com
220	stylishboston.com
221	messengerhangdbags.com
222	nikeky.com
223	toponeaaa.com
224	fashioneasyget.com
225	repmallsneaker.com
226	savingmore-online.com
227	bagsen.com
228	gbuybags.com
229	handbagsbar.com
230	hip-hopvip.com
231	coatsfrance.com
232	jacketfr.com
233	baguiotour.com
234	diamondsnap.com
235	ccwatches.com
236	sonnenoutlet.com
237	desonnenbrillen.com
238	markende.com
239	brands-shoes.com
240	sinvacas.com
241	bedsidebags.com
242	pumpsshirts.com
243	buydiscountbrand.com
244	nltassen.com

245	developbags.com
246	brandfactoryshop.com
247	onsale-bags.com
248	uloveshares.com
249	yiandahanbags.com
250	24salebag.com
251	alicelady.com
252	alicebagshop.com
253	cheapclothingcharm.com
254	officialnikeshop.com
255	guccibeltsoutletbcus.com
256	tinashops.com
257	giubbottoit.com
258	freehotgirllesall.com
259	bellarineestate.com
260	childreni.com
261	replicahandbagsus.com
262	replicahandbags888.com
263	transoffering.com
264	buell-potsdam.com
265	ezidwatches.com
266	2014guccibeltsonsale.com
267	cheapbelts2014.com
268	pickhandbagsale.com
269	livinginmiamibeach.com
270	edesignerhandbagstrend.com
271	hotsneakersonsale.com
272	fauxtotebags.com
273	copy-bags.com
274	shopplazaonline.com
275	replicadream.com
276	fashionbrands-store.com
277	onlines-outletstore.com
278	luxurybrandsonlines.com
279	vetitrendy.com
280	386advice.com
281	sacfinfo.com
282	plusdealmart.com
283	topsalebagn.com
284	aplusbagn.com
285	abmbags.com

286	shopmybag.com
287	replicas-boutique.com
288	onecopyone.com
289	nbalebron11.com
290	nbalebron6.com
291	ozylc8.com
292	apparelare.com
293	essentialdress.com
294	knowncoat.com
295	withapparel.com
296	apparelsight.com
297	affordablecoat.com
298	famouscoat.com
299	apparelsome.com
300	dressalong.com
301	cheapguccibeltshop.com
302	totodress.com
303	clothesform.com
304	namebranddress.com
305	dressmallon.com
306	dressesforum.com
307	stylebeltssale.com
308	madbecause.com
309	scarfsaleing.com
310	burberry-discount.info
311	buycheapbag.info
312	sacschanel.info
313	shoppingluxury.info
314	handbags-replicas.info
315	marcasciarpa.info
316	burberrys-outletonline.net
317	burberryoutletstore2014.net
318	handbagsburberryaustralia.net
319	burberrys-outlet.net
320	1burberryoutlet.net
321	freetousa.net
322	replicapradahandbags.net
323	shopdesignerbagmalls.net
324	sale-swiss.net
325	bagsfactoryoutlet.net
326	tshirtmarque.net

327	lvnikes.net
328	nicescarf.net
329	repicaluxury.net
330	louisvuittonhandvaskorsverige.net
331	qiqifashions01.net
332	replicawatcheview.net
333	achatmarques.net
334	replica-clothing.net
335	brandsclothing.net
336	shoplvmonogramidylle.net
337	lezizsofralar.net
338	designerbaghome.net
339	fashionhandbagshopping.net
340	designer-shop.net
341	cheap-burberry.org
342	bestburberrybags.org
343	classicburberrybags.org
344	cheapburberryhandbags.org
345	burberryfactoryoutlet.org
346	burberry-walletsale.org
347	burberrytaschenoutlets.org
348	bags88.org
349	handbags-discount.org
350	soyoyo.org
351	vetementdoudoune.org
352	tshirthommeferme.org
353	tshirtbon.org
354	vetementsralphlauren.org
355	polonorge.org
356	tilbudtasker.org
357	doudouneparis.org
358	handtaskopen.org
359	doudounemoinscher.org
360	buycheaphandbags.org
361	scarvesonline.org
362	sacmarque.org
363	best-bags.org
364	vaskorraonline.org
365	sacpascherenligne.org
366	laukutfinland.org
367	replicashandbags.org

368	replicaahandbags.org.uk
369	burberryfactoryoutlets.us
370	burberryoutletstores.us
371	burberryoutletstore.us
372	burberrywallet.us
373	ccgrass.us
374	bbhandbags-outlet.us
375	pacificgp.us
376	bboutletbagssale.us

Defendant Domain Names Registrants

No.	Defendant / Registrant Name	Registrant Email
1	terrific. co., ltd.	usedfortesting2011@gmail.com
2	chen songlin	1310893816@qq.com
3	Stephanie Meier	info@yahei.net
4	lin lian lian	dailystock@hotmail.com
5	joyousbuy.cn	oyousbuy@163.com
6	xialin chen	jisfee9988@126.com
7	wen ben zhou	e59e@qq.com
8	BESTDFDD SSLIN	
12	kaiye chen	
13	renywing	
14	may may	
15	Hildegarde MacMillan	
16	Craig Abdullah	
18	Adam Rosser	
20	Haiwen Yang	
21	ifb Americas Steffi Engels	
22	Jodi Fasnacht	
23	NAET TEC UK Limited Comapny	
24	Oliver Beckford	
25	Tezira Nabongo	
26	Samira benbrika	
27	huachao chen	
28	qing hua	qjdjhdh@yahoo.com
29	wang xiaoli	1286096313@qq.com
30	sox bks	1925857046@qq.com
31	li zhipeng	hejuir@163.com
32	yang qingzhao	hurndee@163.com
33	zheng chunwang	1254611787@qq.com
34	fang xingai	1444817228@qq.com

35	Huang Tian	ronice988@163.com
36	Chen Fang	haorenjies@163.com
37	gu meihua	liujiudaili@163.com
38	zhang han	summerswimer@163.com
39	jackhuang	1947618173@qq.com
40	YANG GONGFEI	NHUENS@SINA.COM
41	biglove	564268297@qq.com
42	zhao hao	zhaohao3g@163.com
43	Linpain	463956089@qq.com
44	lin anxiao	burberry1719@163.com
45	xiang xiang	xb20140807@163.com
46	yule	2286028183@qq.com
47	Caroline Riahi	bidu9575@163.com
48	MoMo Too	domian@sina.cn
49	Amy Bloom	yangsi2010@126.com
50	Bennie Jeans	2020114203@qq.com
51	leon hartlebury	leonhartlebury3b@outlook.com
52	han wu	registrar@mail.zgsj.com
53	guoqin yang	prclarisse@hotmail.com
54	wu genglong	ronice1899@gmail.com
55	lorenzo hogan	jimmsab@hotmail.com
56	xiao xi gua	grongttew@yahoo.com
57	leigh avery	lilleigh13@hotmail.co.uk
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3	aliexpress.com/store/1020976	Nice&Fashion Handbag Shop	sxfjx2004@163.com
4	aliexpress.com/store/1039199	365 days online	xuanxuan1102@hotmail.com
5	aliexpress.com/store/1077078	Z&Y 100% real leather bag shop	jiangsh_520@163.com
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19	woshishenzhiqi@126.com
20	dh13822108988@163.com
21	celiajwon@gmail.com
22	gzsuchu1928@gmail.com
23	yinping0826@hotmail.com
24	zhaoyangaitu@163.com
25	lihongna147258@hotmail.com
26	dh13822108988@163.com
27	xiaoli0922@hotmail.com
28	13489453451@163.com
29	349338781@qq.com
30	zhuhongzhen1965@163.com
31	85481380@qq.com
32	jerryzou29@21cn.com
33	billing@captainmro.com
34	jennyshuyangyang@gmail.com
35	lleejewelry@gmail.com
36	gunningojrp@163.com
37	15000120511@163.com
38	annadj@outlook.com
39	ta2_piercing@yahoo.com

40	easyfornetlife@163.com
41	wuwenping0613@163.com
42	wangsong0304@163.com
43	tinachang187@gmail.com
44	292450388@qq.com
45	yiode2011@gmail.com
46	angie198725@163.com
47	vicky_sumaitong@163.com
48	31318753@qq.com
49	guzhe222@163.com
50	bcd0702@163.com
51	450501142@qq.com
52	997065746@qq.com
53	mcwyq1991@hotmail.com
54	cherny@live.cn
55	yayapei0122@126.com
56	merryme001@hotmail.com
57	hui0509hao@hotmail.com
58	qiqixiha808@yeah.net
59	wwwmiao819@yeah.net
60	tujish183@163.com
61	cisarejves6582@hotmail.com
62	faserdyew45741@hotmail.com
63	guperfnews5487@hotmail.com
64	hakertwusty5456@hotmail.com
65	juratfers45778@hotmail.com
66	lerewtasfr54822@hotmail.com
67	nerfuscerw5487@hotmail.com
68	olerascrtw@hotmail.com
69	saregtusw45787@hotmail.com
70	versxedu2012@hotmail.com
71	vurotmesw6487@hotmail.com
72	daoxia943@163.com
73	weizid760@163.com
74	jeanchen8016@163.com
75	niushan1988@126.com
76	haiyueming259@126.com
77	ronghua319@126.com
78	yansuo382@126.com
79	demadadi807@yeah.net
80	specialmarket1@hotmail.com

81	bedeage@hotmail.com
82	chamas@sina.com
83	joneslescote@outlook.com
84	ttdk863@hotmail.com
85	xcverg0835@outlook.com
86	YANYANSUN
87	baidu5188@126.com
88	guihuaxiang929@yeah.net
89	guokecongcong33@163.com
90	shenzhouxing5689@126.com
91	shuguang2668@163.com
92	taoshengyijiu68@yeah.net
93	tianruoyouqing89@163.com
94	balaqian@163.com
95	gooffer2014@163.com
96	qqdhwef4@126.com
97	zuoxiangqichengy@126.com
98	dong88815@163.com
99	vipme_1@126.com
100	shaieshaie34@gmail.com
101	zamancan14@mynet.com
102	le258le@163.com
103	alkkshd@163.com
104	JEFFREYFORD024@hotmail.com
105	paysellbuy@gmail.com
106	susan@teenessentialz.com
107	superangeloh@gmail.com
108	995077426@qq.com
109	paypal@casesfactory.com
110	ideweesywt@yahoo.com
111	mhschroen@yahoo.com
112	882235003@139.com
113	linmeifang1985@hotmail.com
114	bdanleyvvlb@yahoo.com
115	whlnolaserna@yahoo.com
116	baocwang@163.com
117	sophiacf@yahoo.cn
118	feixia6100@126.com
119	newgogo@126.com
120	villanuevaroy80@yahoo.com
121	caoaguishui@163.com

122	xiazheyuan@hotmail.com
123	ckl20148@126.com
124	joyousbuy@163.com
125	degroo8907@yahoo.com
126	seakmyeenr@yahoo.com
128	outletbagsonlinesale365@gmail.com
129	johnsming1018@gmail.com
130	omar_fly@outlook.com
131	cargo.service@hotmail.com
132	oodbags@hotmail.com
133	katesqkrz@hotmail.com
134	watcheswhy@hotmail.com
135	admin@cc.cc
136	shelley353@gmail.com
137	lovefashionfu@hotmail.com
138	chooseitem123@163.com
139	dahanchina008008@163.com
140	trustme8188@yahoo.com
141	chengcheng0306@outlook.com
142	buyerspace@hotmail.com
143	wjixing88@tom.com
144	mohong122@qq.com

Other Email Addresses	
No	Email Address
1	achatmarque@hotmail.com
2	altas1991@yahoo.co.jp
3	annaservicesacs@hotmail.com
4	appareltop@hotmail.com
5	appareltops@gmail.com
6	bagsonlinesalecontact@gmail.com
7	beltsgift@163.com
8	bestreplicahandbags2@gmail.com
9	brandsalescustomercenter@gmail.com
10	brandsbagsbuy@hotmail.com
11	brandshoescap@hotmail.com
12	burberryoutletpro@gmail.com
13	burberryoutletstoresbo@hotmail.com
14	burberrysaleau.com@gmail.com
15	buycheaptee@gmail.com

16	buywatchshop@gmail.com
17	cheapshop88@yahoo.cn
18	cheaptmall@hotmail.com
19	Childsalon@hotmail.com
20	clothinghutchina@hotmail.com
21	cnreplica4u@gmail.com
22	customerservice- online24hs@hotmail.com
23	eshoptimes@gmail.com
24	FashionHandbagsonSale@hotmail.com
25	hervelegercheapsale@gmail.com
26	info@replicabagsnow.com
27	jerseyfrsale@hotmail.com
28	kerytony@hotmail.com
29	leo-han@hotmail.com
30	lovebagshome@gmail.com
31	luxurybrandscustomerservice@gmail.com
32	lvnike9@gmail.com
33	marquelinks@hotmail.com
34	meifang0594@ymail.com
35	muffler-shawl-scarf@hotmail.com
36	mustluxe1@gmail.com
37	newmarquekey@hotmail.com
38	onlineservice24hs@gmail.com
39	rachelwatchbag@gmail.com
40	replicabagshome@hotmail.com
41	replicabagsnow@hotmail.com
42	replica-clothing@hotmail.com
43	replicahiphop@gmail.com
44	replicahiphop@yahoo.com
45	replicastores@gmail.com
46	sacmarque@hotmail.com
47	sales@2014luxurybrand.com
48	sales@shop.com
49	sales@yoursorder.com
50	service.scarf@hotmail.com
51	Service@wholesale0086.com
52	servicesonline2013@gmail.com
53	sessoebasta@hotmail.com
54	shoesbagcn@hotmail.com
55	shoeslead@hotmail.com
56	shoesnfl@hotmail.com

57	shoesnfl@yahoo.com.cn
58	shoppingserviceonline@gmail.com
59	shoppingyours1866@hotmail.com
60	shoxtnmall@hotmail.com
61	support@newbagmall.com
62	support@shop.com
63	tangfei158@yahoo.cn
64	top1stores@gmail.com
65	transoffer@hotmail.com
66	tshirtbon@hotmail.com
67	tshirtmarque@hotmail.fr
68	ventefermarque@hotmail.com
69	victoryltd@hotmail.com
70	vindyzhao@gmail.com
71	viphelpcenter@hotmail.com
72	wholesalebar@hotmail.com
73	Wholesaleok@hotmail.com

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United States District Court, Northern District of Illinois

Name of Assigned Judge or Magistrate Judge	Rebecca R. Pallmeyer	Sitting Judge if Other than Assigned Judge	
CASE NUMBER	13 C 2958	DATE	6/17/2013
CASE TITLE	Oakley, Inc. vs. The Partnerships, et al		

DOCKET ENTRY TEXT

Motion hearing held on 6/17/2013. Oakley, Inc.'s motion for entry of default and default judgment [31] granted. Default and default judgment is entered against each Defendant. Pursuant to 15 U.S.C. § 1117(c)(2), Oakley is awarded statutory damages from each of the Defendants in the amount of two million dollars (\$2,000,000) for willful use of a counterfeit Oakley Trademark on products sold at least the Defendant Domain Names. The ten thousand dollar (\$10,000) bond including any interest minute the registry fee is hereby released to Oakley. Enter Final Judgment Order. (For further detail see separate order.) Status hearing set for 6/25/2013 us stricken.

■ [For further detail see separate order(s).]

Docketing to mail notices.

Courtroom Deputy Initials:	ETV
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MA

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

OAKLEY, INC.)	
)	
)	Case No. 13-cv-2958
Plaintiff,)	
)	Judge Rebecca R. Pallmeyer
v.)	
)	Magistrate Judge Jeffrey Cole
THE PARTNERSHIPS and)	
UNINCORPORATED ASSOCIATIONS)	
IDENTIFIED ON SCHEDULE "A" and DOES)	
1-100,)	
)	
Defendants.)	

FINAL JUDGMENT ORDER

This action having been commenced by Plaintiff Oakley, Inc. ("Oakley") against the Defendants identified in Schedule A to the Complaint and using the Defendant Domain Names and Online Marketplace Accounts;

This Court having entered upon a showing by Oakley, a temporary restraining order and preliminary injunction against Defendants which included a domain name transfer order and asset restraining order;

Oakley having properly completed service of process on Defendants; the combination of providing notice via electronic publication and email, along with any notice that Defendants received from domain name registrars and payment processors, being notice reasonably calculated under all circumstances to apprise Defendants of the pendency of the action and affording them the opportunity to present their objections; and

None of the Defendants having answered the Complaint or appeared in any way, and the time for answering the Complaint having expired;

THIS COURT HEREBY FINDS that Defendants are liable for willful federal trademark infringement and counterfeiting (15 U.S.C. § 1114), false designation of origin (15 U.S.C. § 1125(a)), cyberpiracy (15 U.S.C. § 1125(d)) and violation of the Illinois Uniform Deceptive Trade Practices Act (815 ILCS § 510, et seq.).

IT IS HEREBY ORDERED that Plaintiff's Motion for Entry of Default and Default Judgment is GRANTED in its entirety, that Defendants are deemed in default and that this Final Judgment is entered against Defendants.

IT IS FURTHER ORDERED that:

1. Defendants, their officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under, or in active concert with them be permanently enjoined and restrained from:
 - a. using Oakley's OAKLEY Trademarks or any reproduction, counterfeit copy or colorable imitation thereof in any manner in connection with the distribution, advertising, offering for sale, or sale of any product that is not a genuine Oakley product or not authorized by Oakley to be sold in connection with Oakley's OAKLEY Trademarks;
 - b. passing off, inducing, or enabling others to sell or pass off any product as a genuine OAKLEY product or any other product produced by Oakley, that is not Oakley's or not produced under the authorization, control or supervision of Oakley and approved by Oakley for sale under Oakley's OAKLEY Trademarks;
 - c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control or supervision of Oakley, or are sponsored or approved by, or connected with Oakley;

- d. further infringing Oakley's OAKLEY Trademarks and damaging Oakley's goodwill;
 - e. otherwise competing unfairly with Oakley in any manner;
 - f. 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 Oakley, nor authorized by Oakley to be sold or offered for sale, and which bear Oakley's OAKLEY Trademarks or any reproduction, counterfeit copy or colorable imitation thereof;
 - g. using, linking to, transferring, selling, exercising control over, or otherwise owning the Defendant Domain Names or any other domain name that is being used to sell Counterfeit OAKLEY Products; and
 - h. operating and/or hosting websites at the Defendant Domain Names and any other domain names registered or operated by Defendants that are involved with the distribution, advertising, offering for sale, or sale of any product that is not a genuine OAKLEY product or not authorized by Oakley to be sold in connection with Oakley's OAKLEY Trademarks.
2. The Defendant Domain Names are permanently transferred to Oakley's control. The domain name registries for the Defendant Domain Names, namely VeriSign, Inc., Neustar, Inc., Afilias Limited and the Public Interest Registry, within five (5) business days of receipt of this Order, shall unlock and change the registrar of record for the Defendant Domain Names to a registrar of Oakley's selection, and the domain name registrars shall take any steps necessary to transfer the Defendant Domain Names to Oakley's account at a registrar of Oakley's selection.

3. Those in privity with Defendants and with notice of the injunction, including any Internet search engines, web hosts, domain-name registrars and domain name registries that are provided with notice of the injunction, shall cease facilitating access to any and all websites through which Defendants engage in the sale of counterfeit and infringing goods using the OAKLEY Trademarks.
4. Pursuant to 15 U.S.C. § 1117(c)(2), Oakley is awarded statutory damages from each of the Defendants in the amount of two million dollars (\$2,000,000) for willful use of a counterfeit OAKLEY Trademark on products sold through at least the Defendant Domain Names.
5. Any banks, savings and loan associations, payment processors, PayPal or other financial institutions, for any Defendant or any of Defendants' websites shall within two (2) business days of receipt of this Order:
 - a. Locate all accounts connected to Defendants, Defendants' Marketplace Accounts or Defendants' websites, including, but not limited to, any PayPal accounts; and
 - b. Restrain and enjoin such accounts from transferring or disposing of any money or other of Defendants' assets.
6. All monies currently restrained in Defendants' financial accounts, including monies held by PayPal, Inc. ("PayPal"), are hereby released to Oakley as partial payment of the above-identified damages, and PayPal is ordered to release to Oakley the amounts from Defendants' PayPal accounts within ten (10) business days of receipt of this Order.
7. Until Oakley has recovered full payment of monies owed to it by any Defendant, Oakley shall have the ongoing authority to serve this Order on any banks, savings and loan associations, or other financial institutions including, without limitation, PayPal,

(collectively, the “Financial Service Providers”) in the event that any new financial accounts controlled or operated by Defendants are identified. Upon receipt of this Order, the Financial Service Providers shall immediately:

- a. Locate all accounts connected to Defendants, Defendants’ Marketplace Accounts or Defendants’ websites, including, but not limited to, any PayPal accounts; and
 - b. Restrain and enjoin such accounts from transferring or disposing of any money or other of Defendants’ assets, and any funds in such accounts shall be transferred to Oakley within ten (10) business days of receipt of this Order.
8. In the event that Oakley identifies any additional domain names or financial accounts owned by Defendants, Oakley may send notice of any supplemental proceeding to Defendants by email at the email addresses identified in Schedule A to the Complaint.
9. The ten thousand dollar (\$10,000) bond including any interest minus the registry fee is hereby released to Oakley.

This is a Final Judgment.

DATED: June 27, 2013



U.S. District Court Judge Rebecca R. Pallmeyer