

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.) NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.

I. (a) PLAINTIFFS

DEFENDANTS

(b) County of Residence of First Listed Plaintiff (EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)

Attorneys (If Known)

(d) Check County Where Action Arose: MIAMI-DADE MONROE BROWARD PALM BEACH MARTIN ST. LUCIE INDIAN RIVER OKEECHOBEE HIGHLANDS

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- 1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

- Citizen of This State
Citizen of Another State
Citizen or Subject of a Foreign Country
PTF DEF
1 1 Incorporated or Principal Place of Business In This State
2 2 Incorporated and Principal Place of Business In Another State
3 3 Foreign Nation
4 4
5 5
6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions

Grid of categories for nature of suit: CONTRACT, REAL PROPERTY, PERSONAL INJURY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, LABOR, IMMIGRATION, FORFEITURE/PENALTY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
2 Removed from State Court
3 Re-filed (See VI below)
4 Reinstated or Reopened
5 Transferred from another district (specify)
6 Multidistrict Litigation Transfer
7 Appeal to District Judge from Magistrate Judgment
8 Multidistrict Litigation - Direct File
9 Remanded from Appellate Court

VI. RELATED/ RE-FILED CASE(S)

(See instructions): a) Re-filed Case YES NO b) Related Cases YES NO

JUDGE:

DOCKET NUMBER:

VII. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity):

LENGTH OF TRIAL via days estimated (for both sides to try entire case)

VIII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: Yes No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE

DATE

SIGNATURE OF ATTORNEY OF RECORD

David Rosenberg

FOR OFFICE USE ONLY

RECEIPT # AMOUNT IFP JUDGE MAG JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

I. (a) Plaintiffs-Defendants. Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

II. Jurisdiction. The basis of jurisdiction is set forth under Rule 8(a), F.R.C.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.

United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.

United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked. Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; federal question actions take precedence over diversity cases.)

III. Residence (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

IV. Nature of Suit. Nature of Suit. Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).

V. Origin. Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.

Refiled (3) Attach copy of Order for Dismissal of Previous case. Also complete VI.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge's decision.

Remanded from Appellate Court. (8) Check this box if remanded from Appellate Court.

VI. Related/Refiled Cases. This section of the JS 44 is used to reference related pending cases or re-filed cases. Insert the docket numbers and the corresponding judges name for such cases.

VII. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553

Brief Description: Unauthorized reception of cable service

VIII. Requested in Complaint. Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.

Demand. In this space enter the dollar amount (in thousands of dollars) being demanded or indicate other demand such as a preliminary injunction.

Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

Date and Attorney Signature. Date and sign the civil cover sheet.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO.: _____

TAPESTRY, INC., COACH IP HOLDINGS
LLC, STUART WEITZMAN IP, LLC, and
KATE SPADE LLC

Plaintiffs,

v.

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

Defendants.

COMPLAINT

Plaintiffs Tapestry, Inc., Coach IP Holdings LLC, Stuart Weitzman IP, LLC and Kate Spade LLC (collectively, "Tapestry") hereby sue the Individuals, Partnerships and Unincorporated Associations identified on Schedule A attached (collectively "Defendants"). Defendants are promoting, selling, offering for sale and/or selling products bearing counterfeits of Tapestry's trademarks within this district through fully interactive commercial Internet websites and supporting domains under the domains identified on Schedule A (the "Subject Domain Names"). In support of its claims, Tapestry alleges:

JURISDICTION AND VENUE

1. This is an action for federal trademark counterfeiting and infringement, cybersquatting and common law trademark infringement, pursuant to 15 U.S.C. §§ 1114, 1116, 1125(a), and the All Writs Act, 28 U.S.C. § 1651(a). 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

ROSEMBERG LAW

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Court has jurisdiction over the claims in this action that arise under the laws of the state of Florida pursuant to 28 U.S.C. § 1367 because the state law claim is so related to the federal claims that it forms part of the same case or controversy and derives from a common nucleus of operative facts.

2. Venue is proper in this Court pursuant to 28 U.S.C. § 1391, and this Court may properly exercise personal jurisdiction over Defendants since each of the Defendants engage in infringing activities and cause harm within this district by advertising, offering to sell and/or selling products bearing counterfeit trademarks in this Judicial District.

PARTIES

3. Plaintiff Tapestry, Inc., formerly Coach, Inc., is a corporation duly organized and existing under the laws of the state of Maryland, with its headquarters based in New York City, New York.

4. Plaintiff Coach IP Holdings LLC is a limited liability company duly organized and existing under the laws of the State of Delaware, with its headquarters in New York, New York. Coach IP Holdings is an indirectly wholly-owned subsidiary of Tapestry.

5. Plaintiff Stuart Weitzman IP, LLC is a corporation duly organized and existing under the laws of the State of Delaware, with its headquarters in New York, New York. Stuart Weitzman IP is an indirectly wholly-owned subsidiary of Tapestry.

6. Plaintiff Kate Spade LLC is a corporation duly organized and existing under the laws of the State of Delaware, with its headquarters in New York, New York. Kate Spade LLC is a wholly-owned subsidiary of Tapestry.

7. Defendants operate through domain names registered with registrars in multiple countries and are comprised of individuals and/or business entities of unknown makeup, who, upon information and belief, reside and/or operate in foreign jurisdictions, including the People's

Republic of China. Defendants have the capacity to be sued pursuant to Federal Rule of Civil Procedure 17(b). Defendants conduct their business activities throughout the United States, including within the state of Florida and this Judicial District, through the operation of fully interactive, commercial websites and online marketplaces operating under the Subject Domain Names.

8. Upon information and belief, Defendants use aliases in conjunction with the operation of their businesses, including, but not limited to those identified by the Defendant Numbers listed on Schedule A, attached.

9. Upon information and belief, Defendants are directly and personally contributing to, inducing and engaging in the sale of counterfeit branded products as alleged herein, often as partners, co-conspirators and/or suppliers.

10. Upon information and belief, Defendants are part of an interrelated group of counterfeiters working in active concert to knowingly and willfully manufacture, import, distribute, offer for sale, and sell products bearing counterfeits of Tapestry's registered trademarks in the same transaction, occurrence, or series of transactions or occurrences. Tactics used by Defendants to conceal their identities and the full scope of their counterfeiting operation make it virtually impossible for Plaintiffs' to learn Defendants' true identities and the exact interworking of their massive counterfeit network. If Defendants provide additional credible information regarding their identities, Tapestry will take appropriate steps to amend the Complaint.

11. Defendants are the past and present controlling forces behind the operation of at least the Subject Domain Names.

12. Defendants have registered, purchased and maintained their respective Subject Domain Names, and the websites operating thereunder. Defendants have also engaged in fraudulent conduct with respect to the registration of the Subject Domain Names by providing false or misleading information to their various registrars during the registration or maintenance process. Defendants have registered and maintained their Subject Domain Names for the sole purpose of engaging in illegal counterfeiting activities.

FACTUAL ALLEGATIONS

A. The Tapestry Brands and Trademarks

13. Tapestry, Inc. is a New York-based house of modern luxury lifestyle brands. Tapestry designs, manufactures, markets, distributes, and sells throughout the world, including within this district, a variety of high quality luxury goods such as handbags, wallets, jewelry, watches, shoes, eyewear, fragrances, ready to wear (“RTW”), footwear and fashion accessories under its Coach, Kate Spade, and Stuart Weitzman brands using the associated federally registered trademarks identified on Schedule B (attached) to this Complaint.

14. Tapestry offers for sale and sells its Coach, Kate Spade and Stuart Weitzman trademarked goods through its own specialty retail and outlet stores, authorized distributors such as Nordstrom and Bloomingdales, and online via its own Internet websites.

15. Coach IP Holdings is the registered owner of all of Coach’s United States Federal Trademark Registrations identified on Schedule B (the “Coach Trademarks”), which are valid and registered on the Principal Register of the United States Patent and Trademark Office. Tapestry is Coach IP Holdings’ exclusive licensee for the Coach Trademarks.

16. Stuart Weitzman IP, LLC is the registered owner of all of Stuart Weitzman's United States Federal Trademark Registrations identified on Schedule B (the "Stuart Weitzman Trademarks"), which are valid and registered on the Principal Register of the United States Patent and Trademark Office. Tapestry is Stuart Weitzman IP, LLC's exclusive licensee for the Stuart Weitzman Trademarks.

17. Kate Spade, LLC is the registered owner of all of Kate Spade's United States Federal Trademark Registrations identified on Schedule B (the "Kate Spade Trademarks"), which are valid and registered on the Principal Register of the United States Patent and Trademark Office. Tapestry is Kate Spade, LLC's exclusive licensee for the Kate Spade Trademarks. The Kate Spade, Coach and Stuart Weitzman Trademarks are hereinafter collectively referred to as the "Tapestry Marks".

18. The Tapestry Marks have been continuously used in interstate commerce to identify and distinguish Tapestry's Coach, Stuart Weitzman and Kate Spade brands and their high-quality goods.

19. The Tapestry Marks are symbols of the Tapestry brands' quality, reputation and goodwill and have never been abandoned.

20. The Tapestry Marks have never been assigned or licensed to any of the Defendants in this matter.

21. Tapestry has expended substantial time, money and other resources developing, advertising, and otherwise promoting the Tapestry Marks. The Tapestry Marks qualify as famous marks as that term is used in 15 U.S.C. § 1125(c)(1).

22. Tapestry has extensively used, advertised and promoted the Tapestry Marks in the United States and elsewhere in the world in association with the sale of its high-quality goods and has gone to great lengths to protect and police the Tapestry Marks.

23. As a result, Tapestry's Coach, Stuart Weitzman and Kate Spade names and logos have become famous trademarks, each identifying the products on which they have been used as emanating from a single source. Authentic Coach, Stuart Weitzman and Kate Spade products, so marked, have been, and continue to be, recognized and exclusively associated by the fashion industry and the public with Tapestry, and the goodwill associated with the Tapestry Marks is of incalculable and inestimable value to Tapestry.

24. Authentic goods bearing the Tapestry Marks are widely advertised and promoted by Tapestry and its authorized distributors via the Internet. Tapestry's Coach website (www.coach.com), Stuart Weitzman website (www.stuartweitzman.com), and Kate Spade website (www.katespade.com) each feature proprietary content, images and designs exclusive to their respective brands. Tapestry expends significant monetary resources on Internet marketing and consumer education to educate its consumers about the value associated with Tapestry's brands and products.

B. Defendants' Infringing Conduct

25. Like many other famous trademark owners in the high-end fashion goods market, Tapestry suffers from ongoing daily sustained violations of its trademark rights. Consequently, Tapestry has maintained an aggressive worldwide anti-counterfeiting program which includes regularly investigating suspicious websites and online marketplace listings identified in proactive Internet sweeps and sites voluntarily reported by consumers.

26. At all relevant times, Defendants had full knowledge of the Tapestry Marks, including Tapestry's exclusive right to use and license such intellectual property and the goodwill associated therewith.

27. Defendants are promoting, advertising, selling and/or offering for sale goods in interstate commerce bearing counterfeits and confusingly similar imitations of the Tapestry Marks (the "Counterfeit Goods") through the fully interactive commercial Internet websites and supporting domains under the Subject Domain Names and the URL addresses identified on Schedule C (attached).

28. Defendants facilitate sales by designing the Subject Domain Names and related Internet websites so they appear to unknowing consumers to be authorized online retailers, outlet stores, or wholesalers offering for sale and selling authentic Tapestry trademarked products. Many of the Internet websites look sophisticated and accept payment in U.S. dollars via credit cards, Western Union and PayPal. Numerous Subject Domain Names also incorporate at least one of the Tapestry Marks into the URL, and the Internet websites often include content and design elements that make it very difficult for consumers to distinguish such counterfeit sites from an authorized website. This includes using proprietary images taken directly from Tapestry's websites or from the websites of other authorized retailers of Tapestry's products.

29. Defendants further perpetuate the illusion of legitimacy by offering "live 24/7" customer service and using indicia of authenticity and security that consumers have come to associate with authorized retailers, including the McAfee® Security, VeriSign®, Visa®, MasterCard®, and PayPal® logos.

30. Defendants also deceive unknowing consumers by using the Tapestry Marks without authorization within the content, text, and/or meta tags of their websites in order to attract various search engines crawling the Internet looking for websites relevant to consumer searches for Tapestry's Coach, Stuart Weitzman and Kate Spade products. Additionally, Defendants use other unauthorized search engine optimization ("SEO") tactics and social media spamming so that their Internet website listings show up at or near the top of relevant search results and misdirect consumers searching for authentic products bearing the Tapestry Marks.

31. Although Defendants operate under multiple fictitious names, there are numerous similarities among their websites. For example, many of the Defendants' websites have virtually identical layouts, even though different aliases were used to register the respective domain names. In addition, products bearing counterfeits of the Tapestry Marks bear similar irregularities and indicia of being counterfeit to one another, suggesting that the merchandise was likely manufactured by and originate from a common source and that Defendants are interrelated.

32. The Defendants' websites also include other notable common features, including use of the same domain name registration patterns, shopping cart platforms, accepted payment methods, check-out methods, meta data, illegitimate SEO tactics, HTML user-defined variables, domain redirection, lack of contact information, identically or similarly priced items and volume sales discounts, the same incorrect grammar and misspellings, similar hosting services, similar name servers, and the use of the same text and images, including content copied from Tapestry's websites or those of other authorized retailers of Tapestry's Coach, Stuart Weitzman and Kate Spade products.

33. Several Defendants have registered their respective Subject Domain Name(s) using marks that are nearly identical and/or confusingly similar to at least one of the Tapestry Marks (collectively the “Cybersquatted Subject Domain Names”).

34. Defendants have no license, authority, or other permission from Tapestry to use any of the Tapestry Marks in connection with the advertising, promoting, distributing, publicly displaying, selling, and/or offering for sale of the Counterfeit Goods, or in connection with any of the websites operating under the Cybersquatted Subject Domain Names.

35. Upon information and belief, Defendants 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.

36. Upon information and belief, Defendants have never used any of the Cybersquatted Subject Domain Names in connection with a bona fide offering of goods or services.

37. Upon information and belief, Defendants have not made any bona fide non-commercial or fair use of the Tapestry Marks on a website accessible under any of the Cybersquatted Subject Domain Names.

38. Although some Defendants may be acting independently, they may properly be deemed to be acting in concert because they are combining the force of their actions to multiply the harm caused to Tapestry.

39. The foregoing acts of Defendants are intended to cause, have caused, and are likely to continue to cause confusion or mistake, or to deceive consumers, the public, and the trade into believing that products bearing counterfeits of the Tapestry Marks offered for sale and sold by Defendants are authentic or authorized products of Tapestry.

40. The activities of Defendants, as described above, are likely to create a false impression and deceive consumers, the public, and the trade into believing that there is a connection or association between the Counterfeit Goods and Tapestry.

41. Defendant's knowing and deliberate hijacking of Tapestry's famous trademarks, and sale of their counterfeit product has caused, and continues to cause, substantial and irreparable harm to Tapestry's goodwill and reputation. In addition, the damages caused by Defendants are especially severe because the counterfeit products appear to be inferior in quality to those similar products bearing authentic Tapestry Marks.

COUNT I
Trademark Infringement and Counterfeiting
(15 U.S.C. § 1114)

42. Tapestry hereby re-alleges and incorporates by reference the allegations set forth in paragraphs 1 through 41.

43. Defendants, without authorization from Tapestry have used and are continuing to use in commerce spurious designations that are identical to, or substantially indistinguishable from at least one of the Tapestry Marks.

44. The foregoing acts of Defendants are intended to cause, have caused, and are likely to continue to cause confusion or mistake, or to deceive consumers, the public, and the trade into believing that goods bearing counterfeits of the Tapestry Marks offered for sale and/or sold by Defendants are authentic or authorized Tapestry products.

45. Defendants' activities, as described above, are likely to create a false impression and deceive consumers, the public, and the trade into believing that there is a connection or association between the goods bearing counterfeits of the Tapestry Marks and Tapestry.

46. Defendants have infringed the Tapestry Marks under Section 32 of the Lanham Act, 15 U.S.C. § 1114.

47. Tapestry has suffered and will continue to suffer irreparable injury due to Defendants' above described activities if Defendants are not preliminarily and permanently enjoined.

COUNT II
Claim For Injunctive Relief For Cybersquatting
(15 U.S.C. § 1125(d))

48. Tapestry hereby re-alleges and incorporates by reference the allegations set forth in paragraphs 1 through 41.

49. The Tapestry Marks are highly distinctive and famous marks pursuant to 15 U.S.C. § 1125 and were famous before and at the time of the registration of the Cybersquatted Subject Domain Names.

50. Defendants have no intellectual property rights in or to the Tapestry Marks.

51. The Cybersquatted Subject Domain Names are identical to, confusingly similar to, or dilutive of at least one of the Tapestry Marks.

52. Defendants' actions constitute willful cybersquatting in violation of §43(d) of the Lanham Act, 15 U.S.C. §1125(d).

53. Tapestry has no adequate remedy at law.

54. The registration and use of the Cybersquatted Subject Domain Names incorporating at least one of the Tapestry Marks has caused, is causing, and is likely to continue to cause substantial and irreparable injury to the public and to Tapestry.

55. Tapestry has suffered and will continue to suffer irreparable injury due to Defendants' above described activities if Defendants are not preliminarily and permanently enjoined.

COUNT III
Common Law Trademark Infringement

56. Tapestry hereby re-alleges and incorporate by reference the allegations set forth in paragraphs 1 through 41.

57. This is an action for common law trademark infringement against Defendants based on their promotion, advertisement, offering for sale, and sale of their products bearing counterfeits of the Tapestry Marks. Tapestry is owner of all common law rights in and to the Tapestry Marks.

58. Specifically, upon information and belief, Defendants are promoting and otherwise advertising, distributing, offering for sale, and selling goods bearing counterfeits of at least one of the Tapestry Marks.

59. 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' products bearing counterfeits of at least one of the Tapestry Marks.

60. Tapestry has suffered and will continue to suffer irreparable injury due to Defendants' above described activities if Defendants are not preliminarily and permanently enjoined.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs Tapestry, Inc., Coach IP Holdings LLC, Stuart Weitzman IP, LLC and Kate Spade, LLC respectfully request that this Court enter judgment in their favor and against Defendants, jointly and severally, on all counts pled herein, as follows:

a. Entry of temporary, preliminary and permanent injunction pursuant to 15 U.S.C. § 1116 and Federal Rule of Civil Procedure 65, enjoining Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under, or in active concert with them from manufacturing or causing to be manufactured, importing, advertising or promoting, distributing, selling or offering to sell goods bearing the Tapestry's Marks or any reproductions, counterfeit copies or colorable imitations thereof in any manner; from using any logo, trade name, trademark or trade dress that is calculated to falsely advertise the services or products of Defendants as being sponsored by, authorized by, endorsed by, or in any way associated with Tapestry; from falsely representing themselves as being connected with Tapestry, through sponsorship or association, or engaging in any act that is likely to falsely cause members of the trade and/or the purchasing public to believe any goods or services of Defendants are in any way endorsed by, approved by, and/or associated with Tapestry; 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 Tapestry, or in any way endorsed by Tapestry and from offering such goods in commerce; from engaging in search engine optimization strategies using colorable imitations of the Tapestry Marks; and from otherwise unfairly competing with Tapestry.

b. Entry of temporary, preliminary and permanent injunctions enjoining Defendants from creating, maintaining, operating, joining, and participating in their World Wide Web based illegal marketplace for the sale and distribution of products bearing counterfeits of the Tapestry Marks.

c. Entry of an injunction pursuant to 28 U.S.C. § 1651(a), The All Writs Act and the Court's inherent authority, mandating that, upon Tapestry's request and being provided with notice of the injunction, Microsoft Corporation shall permanently disable, de-index or delist from the Bing search engine the specific URL's identified by Tapestry on Schedule C, and any other URL used by Defendants to promote, offer for sale and/or sell goods bearing counterfeits and/or infringements of the Tapestry Marks.

d. Entry of an injunction pursuant to 28 U.S.C. § 1651(a), The All Writs Act and the Court's inherent authority, mandating that, upon Tapestry's request and being provided with notice of the injunction, any service provider referring or linking users to the specific URLs identified on Schedule C, shall permanently disable the references or links to the specific URLs identified on Schedule C and/or permanently de-index or delist these URLs, and any other URL used by Defendants to promote, offer for sale and/or sell goods bearing counterfeits and/or infringements of the Tapestry Marks.

e. Entry of an injunction pursuant to 28 U.S.C. § 1651(a), The All Writs Act and the Court's inherent authority, mandating that, upon Tapestry's request and being provided with notice of the injunction, the top level domain (TLD) Registry for each of the Subject Domain Names, and any other domains used by Defendants, or their administrators, including backend registry operators or administrators, place the Subject Domain Names 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 to the IP addresses where the associated websites are hosted.

f. Entry of an injunction pursuant to 28 U.S.C. § 1651(a), The All Writs Act and the Court's inherent authority, canceling for life of the current registration or, at Tapestry's election, transferring the Subject Domain Names and any other domain names used by Defendants to engage in their counterfeiting of the Tapestry Marks at issue to Tapestry's control so they may no longer be used for illegal purpose.

g. Entry of an order requiring Defendants to account to and pay Tapestry for all profits and damages resulting from Defendants trademark counterfeiting and infringing activities and that the award to Tapestry be trebled, as provided under 15 U.S.C. § 1117, or, at Tapestry's election with respect to Count I, that Tapestry be awarded statutory damages from each Defendant in the amount of two million dollars (\$2,000,000) per each counterfeit trademark used and type of product sold, as provided by 15 U.S.C. § 1117(c)(2) of the Lanham Act.

h. Entry of an order requiring the relevant Defendants to account and pay Tapestry for all profits and damages resulting from those Defendants' cybersquatting activities and that the award to Tapestry be trebled, as provided for under 15 U.S.C. § 1117, or, at Tapestry's election with respect to Count II, that Tapestry be awarded statutory damages from the relevant Defendants 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.

i. Entry of an award pursuant to 15 U.S.C. § 1117 (a) and (b) of Tapestry's costs and reasonable attorneys' fees and investigative fees associated with bringing this action.

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

Respectfully submitted,

ROSEMBERG LAW

By: /s/ David B. Rosenberg

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Counsel for Plaintiffs Tapestry, Inc.,

Coach IP Holdings LLC, Stuart Weitzman

IP, LLC and Kate Spade, LLC



SCHEDULE "A"
DEFENDANTS BY NUMBER AND SUBJECT DOMAIN NAME








Defendant Number	Defendant / Domain Name
1	2012coachoutlets.com
2	Cheapcoachoutlet.net
2	Cheapercoacchoutlet.net
3	Classicbagonline.com
4	Classicbagsell.com
5	Classicbagsonlinesale.com
6	Coach--outlet-online.org
7	Coach-factoryoutlet-online.us.com
8	Coach-outlet-online.com
9	Coach-outlet.net
10	Coachbags-outlet2017.org
11	Coachbags2017.com
12	Coachbagsforcheap.com
12	Coachoutletonline2017.com
13	Coachbagsell.com
14	Coachbagsofficialsite.net
15	Coachbagsonclearance.com
15	Coachoutletonline2017.com
16	Coachbagusoutlet.com/
17	Coachbagxen.com/
18	Coachblacksales.com
19	Coachcoachtaiwan.com
20	Coachhandbagsshop.us.com/
21	Coachoutlet-inc.net
22	Coachoutlet-site.com
23	Coachoutletofficial.us.com
24	Coachoutletonline-factory.us.com
25	Coachbagsonsaleoutlet.com
25	Coachoutletonline2017.com/
26	Coachoutletonlinecoachfactoryoutlet.com
26	Coach-factoryoutletclearance.us.com/
27	Coachoutletonlinestoresinc.com
28	Coachoutletonlineshop.com
29	Coachoutlets.us.org
30	Coachoutletsale.net
30	Cheapercoachoutlet.net
31	Coachoutletsstore.net
32	Coachoutletstoress.us.com
33	Coachoverbags.com





34	Coachsaleus.com
35	Coachuscom.com
36	Craftsbagdiscounts.com
37	Craftsmanshipstore.com
38	Fashionbagsell.com
39	Hotbagsstore.com
40	Katespade-outlet.us.org
41	Katespadeous.com
42	Katespadeoutletstore.us.org
43	Katespadeoutletsus.com
44	Katespadeoutletuk.co.uk
45	Katespadesen.com
46	Katespadewen.com
47	Katespadexen.com
48	Katespadexus.com
49	Nystyleshop.com
50	Ofcoachoutlet.com
51	Online-coachbags.com
51	Cheapercoacchoutlet.net
52	Shangpin.com/women/brand/katespade
53	Shopcoach.us
54	Stuartweitzmanheels.com
55	Stuartweitzmanoutlet.store
56	Topclassicalshop.com
57	Topestcraft.com
58	Topsclassicalart.com
59	Vnhline.com
60	Zcoachoutlet.com

SCHEDULE "B"

COACH FEDERALLY REGISTERED TRADEMARKS

<u>Registration No.</u>	<u>Mark</u>	<u>Classes</u>	<u>Date of Registration</u>	<u>Image</u>
2,088,706	COACH	6, 9, 16, 18, 20 and 25 for <i>inter alia</i> key fobs, eyeglass cases, cellular phone cases satchels, tags for luggage, luggage, backpacks, picture frames, hats, gloves and caps.	August 19, 1997	COACH
0,751,493	COACH	14 for leather goods, namely, utility kits, portfolios, key cases, pass cases, billfolds, Wallets, pocket secretaries.	June 23, 1963	COACH
2,231,001	COACH	25 for clothing for men and women namely, coats, jackets, overcoats, raincoats, shirts, vest, scarves, shoes and belts.	March 9, 1999	COACH
3,354,448	COACH	14 for inter alia jewelry.	December 11, 2007	COACH
1,071,000	COACH	18, 25 for women's handbags and carryon luggage.	August 9, 1977	COACH
3,413,536	COACH EST. 1941 STYLIZED	14 for jewelry.	April 15, 2008	
1,309,779	COACH & LOZENGE DESIGN	9, 16, 18 for inter alia eyeglass cases, checkbook cases, pocket secretaries and leather goods, namely, wallets, handbags and shoulder bags.	December 19, 1984	





<u>Registration No.</u>	<u>Mark</u>	<u>Classes</u>	<u>Date of Registration</u>	<u>Image</u>
2,626,565	CC & DESIGN (Signature C)	18 for inter alia handbags, purses, clutches, shoulder bags, tote bags, and wallets.	September 24, 2002	
2,592,963	CC & DESIGN (Signature C)	25 for inter alia clothing namely, scarves, belts, gloves, hats, shoes, coats, jackets.	July 9, 2002	
4,365,898	COACH Signature C Design	9 for protective covers and cases for cell phones, laptops and portable media players.	July 9, 2013	
4,365,899	COACH OP ART	9 for protective covers and cases for cell phones, laptops and portable media players.	July 9, 2013	
4,105,636	COACH OP ART	14, 18, 25 for inter alia jewelry, watches, wallets, handbags, belts, hats, scarves, shoes, coats, gloves and t-shirts.	February 28, 2012	
4,296,582	COACH EST. 1941 NEW YORK	14, 16, 18 and 25 for jewelry and watches, handbags, leather credit card cases, purses, shoulder bags, wallets, belts, coats, t-shirts, hats, gloves, shoes, day planners.	February 26, 2013	
4,359,191	COACH EST. 1941 NEW YORK	9 for protective covers and cases for cell phones, laptops and portable media players.	June 25, 2013	





<u>Registration No.</u>	<u>Mark</u>	<u>Classes</u>	<u>Date of Registration</u>	<u>Image</u>
4,744,715	COACH NEW YORK & DESIGN	18 for inter alia handbags, small leather goods, luggage, umbrellas	May 26, 2015	
4,744,718	COACH NEW YORK & DESIGN	25 for inter alia clothing, coats, belts, gloves, shoes	May 26, 2015	
4,744,720	COACH NEW YORK & DESIGN	9 for sunglasses, eyewear, cell phone cases, tablet covers and cases	May 26, 2015	
4,744,721	COACH NEW YORK & DESIGN	14 for jewelry, ornamental pins and watches	May 26, 2015	

STUART WEITZMAN'S FEDERALLY REGISTERED TRADEMARKS

REGISTRATION NO.	MARK	CLASSES AND GOODS	DATE OF REGISTRATION	IMAGE
1386002	STUART WEITZMAN	25 SHOES	Mar-11-1986	STUART WEITZMAN
5100091	STUART WEITZMAN	25 footwear	Dec-13-2016	
3474821	STUART WEITZMAN (Stylized)	25 SHOES	Jul-29-2008	S T U A R T W E I T Z M A N
5100083	STUART WEITZMAN non-stacked logo	25 footwear	Dec-13-2016	STUART WEITZMAN

KATE SPADE'S FEDERALLY REGISTERED TRADEMARKS

Registration Number	Trademark	Class and Goods	Date of registration	Image
4138884	KATE SPADE NEW YORK	9: Carrying cases for electronic equipment, namely, cell phones and laptops; Cell phone covers; Protective sleeves for laptop computers.	5/8/2012	
2537318	KATE SPADE NEW YORK	18: Handbags, all purpose carrying bags, tote bags, travelling bags, shoulder bags, clutch purses, all-purpose athletic bags, backpacks, wallets, coin purses and cosmetic bags (sold empty).	2/5/2002	
2613247	KATE SPADE NEW YORK	25: Dresses, skirts, tops, shirts, sweaters, sleepwear, pajamas, bathrobes, footwear, shoes, hats, bandannas, scarves, coats, and gloves.	8/27/2002	
4158419	KATE SPADE NEW YORK and Spade Design	9: Eyeglass chains and cords; eyeglass frames; eyeglasses; eyewear; eyewear cases; sunglasses.	6/12/2012	
4158410	KATE SPADE NEW YORK and Spade Design	14: Ankle bracelets; bracelets; charms; earrings; jewelry; jewelry boxes; jewelry cases; necklaces; pendants; pins being jewelry; rings; watches.	6/12/2012	
4155450	KATE SPADE NEW YORK and Spade Design	18: Backpacks; Beach bags; Card wallets; Clutch bags; Clutch purses; Cosmetic bags sold empty; Cosmetic cases sold empty; Credit card cases; Handbags; Key bags; Key cases; Key wallets; Luggage; Purses; Sport bags; Tote bags; Travel bags; Travel cases; Umbrellas; Wallets	6/5/2012	
4155451	KATE SPADE NEW YORK and Spade Design	25: Belts; Blazers; Blouses; Bottoms; Bras; Coats; Dresses; Footwear; Gloves; Headwear; Hosiery; Jackets; Jeans; Knit tops; Lingerie; Loungewear; Neckwear; Pants; Scarves; Shirts; Shorts; Skirts; Sleepwear; Socks; Suits; Sweaters; Swimwear; T-shirts; Tank tops; Tops; Underwear	6/5/2012	

5205421	Spade Design	9:Carrying cases specially adapted for electronic equipment, namely, cell phones, laptops, portable readers, portable tablets, ear buds and portable media players; Computer mouse; Ear buds; Eyeglass chains and cords; Eyewear cases; Protective covers and cases for cell phones, laptops and portable media players; Protective covers and cases for tablet computers; USB (universal serial bus) hardware.	5/16/2017	
5028262	Spade Design	14:Jewelry; Jewelry boxes; Jewelry cases; Pins being jewelry; Watches.	8/23/2016	
5032905	Spade Design	25: Backpacks; Beachbags; Clutch bags; Clutches; Cosmetic bags sold empty; Credit card cases and holders; Handbags, purses and wallets; Key bags; Keycases; Luggage; Sports bags; Tote bags; Travel bags; Umbrellas.	8/30/2016	
4889147	Spade Design	25:A full line of women's clothing, footwear, and headwear.	1/19/2016	

SCHEDULE “C”

C-1 Defendant Number 1 - 2012coachoutlets.com

http://www.2012coachoutlets.com/
http://www.2012coachoutlets.com/coach-women-s-reversible-satin-varsity-jacket-shell-multi.html?search=coach

C-2 Defendant Number 2 – cheapcoachoutlet.net

http://www.cheapcoachoutlet.net/
http://www.cheapercoachoutlet.net/
http://www.cheapercoachoutlet.net/coach-flowers-beige-purple-iphone-6-cases-fak-p-2403.html
http://www.cheapercoachoutlet.net/tote-bag-black-brwon-coach-p944.html
http://www.cheapercoachoutlet.net/coach-sunglasses-style001-p-770.html

C-3 Defendant Number 3- classicbagonline.com

http://www.classicbagonline.com
http://www.classicbagonline.com/coach-legacy-pinnacle-lowell-in-signature-large-khaki-satchels-adw-p-133.html#.WBH3U_mECqE
http://www.classicbagonline.com/coach-legacy-candance-carryall-medium-black-satchels-aam-p-123.html#.Wili1GepWUk

C-4 Defendant Number 4 - classicbagsell.com

http://www.classicbagsell.com
http://www.classicbagsell.com/coach-legacy-pinnacle-lowell-in-signature-large-khaki-satchels-adw-p-133.html#.WBH3U_mECqE
http://www.classicbagsell.com/coach-poppy-in-signature-medium-purple-totes-AEG-p-195.html

C-5 Defendant Number 5 - classicbagsonlinesale.com

http://www.classicbagsonlinesale.com
http://www.classicbagsonlinesale.com/Coach-Logo-Signature-Bracelets-CKV-p-191.html
http://www.classicbagsonlinesale.com/Coach-Gorgina-Black-Sunglasses-AMF-p-151.html
http://www.classicbagsonlinesale.com/Coach-Legacy-Accordian-Zip-In-Signature-Large-Pink-Wallets-EUW-p-9.html
http://www.classicbagsonlinesale.com/Coach-Poppy-In-Signature-Medium-Purple-totes-AED-p-195.html

C-6 Defendant Number 35 – *craftsbagdiscounts.com*

http://www.craftsbagdiscounts.com/
http://www.craftsbagdiscounts.com/coach-legacy-duffle-in-printed-signature-medium-grey-crossbody-bags-ACH-p-200.html
http://www.craftsbagdiscounts.com/coach-swagger-20-in-pebble-leather-p-498.html

C-7 Defendant Number 7- *coach-factory-outletonline.us.com*

http://www.coach-factoryoutlet-online.us.com/
http://www.coach-factoryoutlet-online.us.com/coach-sunglass-8020-p-434.htm
http://www.coach-factoryoutlet-online.us.com/coach-legacy-logo-in-monogram-large-black-totes-bqh-p-726.html
http://www.coach-factoryoutlet-online.us.com/coach-logo-monogram-multicolor-iphone-6-eyw-p-575.html
http://www.coach-factoryoutlet-online.us.com/coach-accordion-zip-in-gathered-twist-large-black-wallets-ccf-p-1413.html

C-8 Defendant Number 28 - *coachoutletsale.net*

http://www.coachoutletsale.net/
http://www.coachoutletsale.net/coach-logo-large-coffee-wallets-axz-p-1105.html
http://www.coachoutletsale.net/coach-logo-large-wallets-bct-p-1106.html
http://www.coachoutletsale.net/coach-sunglasses-c-76coach-sunglasses-8002-p-1755.html

C-9 Defendant Number 8 - *coach-outlet-online.com*

http://www.coach-outlet-online.com/
http://www.coach-outlet-online.com/newlist.php
http://www.coach-outlet-online.com/coach-outlet-coupons-texas-n-1236.html
http://www.coach-outlet-online.com/printable-coach-outlet-coupons-discounts-n-1123.html

C-10 Defendant Number 46- *coach-outlet-online.org*

http://www.coach-outlet-online.org
http://www.coachoutlet-inc.net/

C-11 Defendant Number 9 – *coach-outlet.net*

http://www.coach-outlet.net/
http://www.coach-outlet.net/Coach-Turnlock-Large-Silver-Hobo-BAE-Style-NO.-158380-p-1291.html
http://www.coach-outlet.net/Coach-Big-Logo-Red-Samsung-Note-3-Cases-DRP-Style-No.-157163-p-137.html
http://www.coach-outlet.net/Coach-Daylan-Red-Sunglasses-DLU-Style-No.-157276-p-420.html

C-12 Defendant Number 10 – coachbags-outlet2017.org

http://www.coachbags-outlet2017.org/
http://www.coachbags-outlet2017.org/coach-logo-c-small-organge-crossbody-bags-eqb-p-171.html?zenid=4elirmg6fnudb5es1aacn3vt493
http://www.coachbags-outlet2017.org/coach-legacy-in-signature-large-khaki-satchels-accpink-wallets-euw-p-127.html?zenid=ntk1tq2q71i75g5armou5n1g2

C-13 Defendant Number 11 - coachbags2017.com

http://www.coachbags2017.com
http://www.coachbags2017.com/Authentic-Outlet-Online-1735_p
http://www.coachbags2017.com/Authentic-Outlet-Online-1677_p
http://www.coachbags2017.com/Authentic-Outlet-Online-2471_p
http://www.coachbags2017.com/Authentic-Outlet-Online-2928_p

C-14 Defendant Number 13 – coachbagsell.com

http://www.coachbagsell.com/

C-15 Defendant Number 14 – coachbagsofficialsite.net

http://www.coachbagsofficialsite.net/
http://www.coachbagsofficialsite.net/coach-classic-in-signature-medium-black-backpacks-eja-p-5.html
http://www.coachbagsofficialsite.net/coach-in-monogram-large-khaki-business-bags-dhh-p-16.html
http://www.coachbagsofficialsite.net/coach-shoulder-bags-outlet-197-p-213.html

C-16 Defendant Number 15 - coachbagsonclearance.com/

http://www.coachbagsonclearance.com/
http://www.coachoutletonline2017.com

C-17 Defendant Number 16 - coachbagusoutlet.com

http://www.coachbagusoutlet.com/
http://www.coachbagusoutlet.com/coach-legacy-candance-in-signature-medium-black-satchels-asn-p-1176.html?zenid=8r70t4rt960ma6rsgq8nal6q7
http://www.coachbagusoutlet.com/coach-poppy-candance-carryall-large-beige-satchels-abh-p-2433.html

C-18 Defendant Number 17- coachbagxen.com

http://www.coachbagxen.com/
http://www.coachbagxen.com/rogue-bag-25-in-glovetanned-pebble-leather-style-no-54536-p-194.html
http://www.coachbagxen.com/accordion-signature-zip-wallet-yellow-p-70.html

C - 19 Defendant Number 18 - coachblacksales.com

http://www.coachblacksales.com/
http://www.coachblacksales.com/coach-outlet-logo-monogram-khaki-heels-cn-x-p-167.html
http://www.coachblacksales.com/coach-outlet-big-logo-black-white-ipod-touch-5th-cab-p-3044.html
http://www.coachblacksales.com/coach-outlet-charm-hang-tag-black-necklaces-czk-p-3289.html
http://www.coachblacksales.com/coach-outlet-annette-red-sunglasses-dat-p-3456.html

C-20 Defendant Number 19 - coachcoachtaiwan.com

http://www.coachcoachtaiwan.com/
http://www.coachcoachtaiwan.com/new-arrival-2017-c-18.html
http://www.coachcoachtaiwan.com/coach-bownot-black-bracelets-ako-p-2.html
http://www.coachcoachtaiwan.com/coach-fashion-signature-medium-coffee-shoulder-bag-erg-p-131.html
http://www.coachcoachtaiwan.com/coach-legacy-in-signature-large-pink-wallets-bvu-p-128.html

C-21 Defendant Number 20 - coachhandbagsshop.us.com

http://www.coachhandbagsshop.us.com/
http://www.coachhandbagsshop.us.com/coach-madison-signs-large-apricot-totes-fem-p-2621.html
http://www.coachhandbagsshop.us.com/coach-alegra-khaki-sneakers-cok-p-1075.html
http://www.coachhandbagsshop.us.com/coach-angeline-brown-sunglasses-bht-p-1720.html
http://www.coachhandbagsshop.us.com/coach-julia-logo-medium-grey-totes-fep-2624.html
http://www.coachhandbagsshop.us.com/coach-bowknot-logo-black-bracelets-akm-p-2410.html
http://www.coachhandbagsshop.us.com/coach-big-logo-black-white-samsung-note-3-cases-drm-p-672.html

C-22 Defendant Number 21 - coachoutlet-inc.net

http://www.coachoutlet-inc.net/
http://www.coachoutlet-inc.net/coach-only-125-value-spree-23-ddj-p-1094.html
http://www.coachoutlet-inc.net/coach-only-185-value-spree-3-efa-p-1102.html
http://www.coachoutlet-inc.net/coach-only-185-value-spree-10-efh-p-1109.html

C-23 Defendant Number 22 - coachoutlet-site.com

http://www.coachoutlet-site.com/ redirects to
http://www.coachoutletonlineshopping.us.org/
http://www.coachoutletonlineshopping.us.org/coahc-handbags-063-p-2422.html
http://www.coachoutletonlineshopping.us.org/coahc-handbags-070-p-2415.html

C-24 Defendant Number 23- Coachoutletofficial.us.com

http://www.coachoutletofficial.us.com/

C-25 Defendant Number 24 - coachoutletonline-factory.us.com

http://www.coachoutletonline-factory.us.com/
http://www.coachoutletonline-factory.us.com/sunglasses-2017-c-24/coach-sunglasses-8002-p-169.html
http://www.coachoutletonline-factory.us.com/cases-c-28_30/coach-logo-monogram-multicolor-iphone-5-5s-cases-aug-p-369.html
http://www.coachoutletonline-factory.us.com/jewelry-c-28_29/coach-circle-charm-gold-necklaces-czd-p-269.html
http://www.coachoutletonline-factory.us.com/poppy-c-66_67/coach-big-c-signature-large-yellow-satchels-emx-p-970.html
http://www.coachoutletonline-factory.us.com/coach-bleeker-pinnacle-riley-logo-medium-coffee-satchels-etv-p-1179.html

C-26 Defendant Number 23 - coachoutletonline2017.com

http://www.coachoutletonline2017.com/
http://www.coachoutletonline2017.com/coach-black-gray-poppy-bag-p-538.html
http://www.coachoutletonline2017.com/2016-best-sallers-style05-p-1391.html
http://www.coachoutletonline2017.com/gray-brown-caoch-handbag-p-393.html
http://www.coachoutletonline2017.com/2016-best-sallers-style40-p-1426.html
http://www.coachoutletonline2017.com/2016-best-sallers-style02-p-1388.html
http://www.coachoutletonline2017.com/coach-big-logo-red-iphone-6-cases-ezr-p-1643.html

C-27 Defendant Number 31 - coachoutletsale.net/

Http://www.coachoutletsale.net
http://www.cheapercoachoutlet.net

C-28 Defendant Number 12 - Coachbagsforcheap.com

http://www.coachbagsforcheap.com
http://www.coachoutletonline2017.com/

C-29 Defendant Number 25 - Coachbagsonsaleoutlet.com

http://www.coachbagsonsaleoutlet.com
http://www.coachoutletonline2017.com/

C-30 Defendant Number 26 - Coachoutletonlinecoachfactoryoutlet.com

http://www.coachoutletonlinecoachfactoryoutlet.com
http://www.coach-factoryoutletclearance.us.com/
http://www.coach-factoryoutletclearance.us.com/coach-sunglasses-8024-p-1671.html
http://www.coach-factoryoutletclearance.us.com/coach-convertible-hippie-signature-medium-brown-crossbody-bags-ayy-p-1389.html

C-31 Defendant Number 27 - Coachoutletonlineestoresinc.com

http://www.coachoutletonlineestoresinc.com/
http://www.coachoutletonlineestoresinc.com/coach-julia-logo-medium-grey-totes-outlet-176.html?zenid=6gi4mpu65isgn6p85kmsu0gt41
http://www.coachoutletonlineestoresinc.com/caoch-outlet-store-sunglasses-outlet-135.html?zenid=6gi4mpu65isgn6p85kmsu0gt41
http://www.coachoutletonlineestoresinc.com/coach-kristin-lock-in-signature-large-brown-wallets-outlet-326.html?zenid=6gi4mpu65isgn6p85kmsu0gt41
http://www.coachoutletonlineestoresinc.com/coach-legacy-accordion-zip-large-coffee-wallets-outlet-94.html?zenid=6gi4mpu65isgn6p85kmsu0gt41
http://www.coachoutletonlineestoresinc.com/coach-in-confetti-signature-mulyicolor-iphone-6cases-outlet-298.html

C-32 Defendant Number 28 - Coachoutletonlineshop.com

http://www.coachoutletonlineshop.com/
http://www.coachoutletonlineshop.com/coach-dinky-in-exotic-coach-link-leather-86855-light-antique-nickel-black-pink-p-1333.html?zenid=tkd5jtoj7jpoav5vhojaulvb75

C-33 Defendant Number 29 - Coachoutlets.us.org

http://www.coachoutlets.us.org/
http://www.coachoutlets.us.org/coach-outlet-diamond-circle-stud-silver-earrings-akb-p-1323.html

C-34 Defendant Number 31 - Coachoutletsstore.net

http://www.coachoutletsstore.net/
http://www.coachoutletsstore.net/coach-logo-large-coffee-wallets-axz-p-1105.html
http://www.coachoutletsstore.net/coach-logo-red-wallets-axz-p-1106.html
http://www.coachoutletsstore.net/coach-sunglasses-c-76/coachsunglasses-8002-p-1755.html

C-35 Defendant Number 32 - Coachoutletstoress.us.com

http://www.coachoutletstoress.us.com/
http://www.coachoutletstoress.us.com/coach-only-109-value-spree-21-20269-p-25.html#.WiiEOWepWUk
http://www.coachoutletstoress.us.com/coach-only-109-value-spree-8-20241-p-12.html#.WiiEWmepWUk
http://www.coachoutletstoress.us.com/coach-logo-oblong-black-scarf-22421-p-2367.html#.WiiE3mepWUk
http://www.coachoutletstoress.us.com/coach-logo-oblong-purple-scarf-22405-p-2361.html#.WiiE-mepWUk
http://www.coachoutletstoress.us.com/coach-alena-khaki-flats-22301-p-2519.html#.WiiFZ2epWUk
http://www.coachoutletstoress.us.com/coach-big-logo-black-iphone-6-cases-21813-p-290.html#.WiiFhWepWUk
http://www.coachoutletstoress.us.com/coach-bowknot-logo-black-bracelets-22619-p-1051.html#.WiiFnepWUk
http://www.coachoutletstoress.us.com/coach-charm-hang-tag-black-necklaces-22123-p-990.html#.WiiFv2epWUk

C-35 Defendant Number 33 - Coachoverbags.com

<http://www.coachoverbags.com/>

C-36 Defendant Number 34- Coachsaleus.com

http://www.coachsaleus.com/
Http://www.coachsaleus.com/pebbled-leather-crossbody-bag-black-p-209.html
Http://www.coachsaleus.com/accordion-wallet-in-signature-canvas-p-28.html

C-37 Defendant Number 35 - Coachuscom.com

http://www.coachuscom.com/
http://www.coachuscom.com/madison-c-7_8/coach-accordion-zip-in-croc-embossed-large-red-wallets-cclp-22.html
http://www.coachuscom.com/new-arrivals-c-6/coach-swagger-27in-pebble-leather-in-cheap-price-p-3813.html

C-38 Defendant Number 36 - craftbagdiscounts.com

http://www.craftbagdiscounts.com/
http://www.craftbagdiscounts.com/coach-legacy-duffle-in-printed-signature-medium-grey-crossbody-bags-ACH-p-200.html
http://www.craftbagdiscounts.com/craftbagdiscounts.com/coach-swagger-20-in-pebble-leather-p-498.html

C-39 Defendant Number 37 - Craftsmanshipstore.com

http://www.craftsmanshipstore.com/
http://www.craftsmanshipstore.com/rogue-bag-in-colorblock-python-p-157.html
http://www.craftsmanshipstore.com/combination-meals-style-no-36370style-no-53602-p-44.html
http://www.craftsmanshipstore.com/shoulder-bags-c-7.html
http://www.craftsmanshipstore.com/edie-shoulder-bag-28-insignature-jacquard-p-95.html

C-40 Defendant Number 38 - Fashionbagsell.com

http://www.fashionbagsell.com/

C-41 Defendant Number 39 - Hotbagsstore.com

http://www.hotbagsstore.com /
http://www.hotbagsstore.com /coach-braided-in-signature-large-black-totes-bfq-p-188.html?zenid=ea9rp6nicn3pk984ra3pkdtf14
http://www.hotbagsstore.com /coach-poppy-bowknot-signature-medium-coffee-totes-ana-p-191.html?zenid=ea9rp6nicn3pk984ra3pkdtf14
http://www.hotbagsstore.com /coach-legacy-logo-signature-large-black-wallets-brw-p-44.html

C-42 Defendant Number 40 - Katespade-outlet.us.org

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