

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO.: 17-24561-CIV-SCOLA

TAPESTRY, INC., and OTHERS,

Plaintiffs,

v.

2012COACHOUTLETS.COM,
and OTHERS,

Defendants.

[PROPOSED] ORDER

THIS CAUSE is before the Court upon Plaintiffs Tapestry, Inc., Coach IP Holdings LLC, Stuart Weitzman IP, LLC and Kate Spade LLC (collectively, “Plaintiffs”), Motion for Entry of Final Default Judgment Against Defendants¹ (ECF No. 25) (“Motion”), filed on March 16, 2018. A Clerk’s Default (ECF No. 23), was entered against Defendants on March 13, 2018, as Defendants failed to appear, answer, or otherwise plead to the Complaint (ECF No. 1), despite having been served. *See* Plaintiffs’ Motion for Clerk’s Entry of Default (ECF No. 23); Return of Summons (ECF Nos. 19-21). The Court has carefully considered the Motion, the record in this case, the applicable law, and is otherwise fully advised. For the following reasons, Plaintiffs’ Motion is granted.

¹ Defendants are the individuals, partnerships and unincorporated associations identified on Schedule “A” of Plaintiffs’ Motion, and Schedule “A” of this Order. *See* ECF No. 25.

I. Introduction

Plaintiffs sued Defendants for trademark counterfeiting and infringement under § 32 of the Lanham Act, 15 U.S.C. § 1114; cybersquatting under § 43(a) of the Lanham Act, 15 U.S.C. § 1125(d); and common-law trademark infringement. The Complaint alleges that Defendants are promoting, advertising, distributing, offering for sale and selling goods bearing counterfeits and confusingly similar imitations of Plaintiffs' registered trademarks within the Southern District of Florida through the fully interactive commercial Internet websites and supporting domain names operating under their domain names identified on Schedule "A" attached to Plaintiffs' Motion (collectively, the "Subject Domain Names"), including the URLs identified on Schedule "B" attached to Plaintiffs' Motion.

Plaintiffs further assert that Defendants' unlawful activities have caused and will continue to cause irreparable injury to Plaintiffs because Defendants have (1) deprived Plaintiffs of their rights to determine the manner in which their trademarks are presented to the public through merchandising; (2) defrauded the public into thinking Defendants' goods are goods authorized by Plaintiffs; (3) deceived the public as to Plaintiffs' association with Defendants' goods and the websites that market and sell the goods; and (4) wrongfully traded and capitalized on Plaintiffs' reputation and goodwill, as well as the commercial value of Plaintiffs' trademarks.

In their Motion, Plaintiffs seek the entry of default final judgment against Defendants in an action alleging trademark counterfeiting and infringement, cybersquatting, and common-law trademark infringement. Plaintiffs further request that the Court (1) enjoin Defendants from producing or selling goods that infringe their trademarks; (2) disable, or at Plaintiffs' election, transfer the domain names at issue to Plaintiffs; and (3) award statutory damages.

Pursuant to Federal Rule of Civil Procedure 55(b)(2), the Court is authorized to enter a final judgment of default against a party who has failed to plead in response to a complaint. “[A] defendant’s default does not in itself warrant the court entering a default judgment.” *DirecTV, Inc. v. Huynh*, 318 F. Supp. 2d 1122, 1127 (M.D. Ala. 2004) (quoting *Nishimatsu Constr. Co., Ltd. v. Houston Nat’l Bank*, 515 F.2d 1200, 1206 (5th Cir. 1975)). Granting a motion for default judgment is within the trial court’s discretion. *See Nishimatsu*, 515 F.2d at 1206. Because the defendant is not held to admit facts that are not well pleaded or to admit conclusions of law, the court must first determine whether there is a sufficient basis in the pleading for the judgment to be entered. *See id.*; *see also Buchanan v. Bowman*, 820 F.2d 359, 361 (11th Cir. 1987) (“[L]iability is well-pled in the complaint and is therefore established by the entry of default . . .”). Upon a review of Plaintiffs’ submissions, it appears there is a sufficient basis in the pleading for the default judgment to be entered in favor of Plaintiffs.

II. Factual Background²

Coach IP Holdings LLC is the owner of all rights in and to the federally registered Coach trademarks identified in Composite Exhibit 1 attached to the Declaration of Karla Aspiras, ¶ 6 (“Aspiras Decl.”) (the “Coach Trademarks”) filed in Support of Plaintiffs’ Application for Temporary Restraining Order (ECF No. 5-2). Stuart Weitzman IP, LLC is the owner of all rights in and to the federally registered Stuart Weitzman trademarks identified in Composite Exhibit 1 of Aspiras Decl. ¶ 7 (the “Stuart Weitzman Trademarks”). Kate Spade LLC is the owner of all rights in and to the federally registered Kate Spade trademarks identified on Composite Exhibit 1 of Aspiras Decl. ¶ 8 (the “Kate Spade Trademarks”). Tapestry is the exclusive licensee for the Coach

² The factual background is taken from Plaintiffs’ Complaint (ECF No. 1), Plaintiffs’ Motion (ECF No. 25), and supporting evidentiary submissions.

Trademarks, Stuart Weitzman Trademarks and Kate Spade Trademarks (collectively, the “Tapestry Marks”), and is authorized to enforce all rights in those trademarks. *Id.* at ¶¶ 6, 7, 8. The Tapestry Marks are used in connection with the manufacture and distribution of high quality goods in the categories identified in the United States Registrations for the Tapestry Marks at issue. *Id.* The Tapestry Marks are symbols of their respective brand’s quality, reputation, and goodwill and have never been abandoned. *Id.* at ¶ 10. Moreover, Tapestry has expended substantial time, money, and resources developing, advertising, and otherwise promoting the Tapestry Marks. *Id.* at ¶ 12. Accordingly, the Tapestry Marks are famous marks as the term is used in 15 U.S.C. § 1125(c)(1). *Id.*

Tapestry has extensively used, advertised, and promoted the Tapestry Marks in the United States and elsewhere in association with high quality luxury goods and has carefully monitored and policed the use of the Tapestry Marks. *Id.* at ¶ 13. At all relevant times, Defendants have been aware of: (a) Coach IP Holdings, Stuart Weitzman IP, LLC, and Kate Spade LLC’s ownership of their respective trademarks; (b) Tapestry’s exclusive rights to use such trademarks; and (c) the substantial goodwill embodied in, and favorable recognition for, the Tapestry Marks. *Id.* at ¶¶ 6-8, 13-14.

Defendants, through various fully interactive, commercial Internet websites and supporting domains operating under the domain names identified on Schedule “A” (the “Subject Domain Names”), including the URLs identified on Schedule “B”, have advertised, promoted, offered for sale, or sold goods bearing counterfeit and infringing trademarks which are substantially indistinguishable from and/or colorable imitations of the registered Tapestry Marks. Aspiras Decl. ¶¶ 17, 19; Compl. ¶ 27 (ECF No. 1). Defendants’ unlawful activities includes using proprietary images taken directly from Tapestry’s respective websites or from the websites of other authorized retailers of Tapestry’s products. Aspiras Decl. ¶ 18; Compl. ¶ 28. 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. Compl. ¶ 26. Defendants do not have, nor have they ever had, the right or authority to use the Tapestry Marks for any purpose. Aspiras Decl. ¶ 11; Compl. ¶ 34. Given Defendants' copying of the Tapestry Marks, authentic goods bearing the Tapestry Marks and the Defendants' goods are indistinguishable to consumers, both at the point of sale and post-sale. Compl. ¶¶ 39, 40. By using the Tapestry Marks, Defendants have created a false association between their counterfeit and infringing goods and websites and Tapestry's trademarked products. *Id.*

Plaintiffs' representative reviewed and visually inspected each Defendant's website, as well as the images of various items bearing the Tapestry Marks offered for sale by the Defendants through the Internet websites operating under the Subject Domain Names, and determined the products offered for sale are non-authentic, unauthorized versions of Plaintiffs' products. Aspiras Decl. ¶¶ 16, 17, 19.

III. Analysis

A. Claims

1. Trademark Counterfeiting and Infringement Under 15 U.S.C. § 1114 (Count I)

Section 32 of the Lanham Act, 15 U.S.C. § 1114, provides liability for trademark infringement if, without the consent of the registrant, a defendant uses "in commerce any reproduction, counterfeit, copy, or colorable imitation of a registered mark: which is likely to cause confusion, or to cause mistake, or to deceive." 15 U.S.C. § 1114. To prevail on its trademark infringement claim under Section 32 of the Lanham Act, a plaintiff must demonstrate that (1) it had prior rights to the mark at issue; and (2) Defendants adopted a mark or name that was the same, or confusingly similar to plaintiff's trademark, such that consumers were likely to confuse the two.

PetMed Express, Inc. v. MedPets.Com, Inc., 336 F. Supp. 2d 1213, 1217 (S.D. Fla. 2004) (citing *Int'l Cosmetics Exch., Inc. v. Gapardis Health & Beauty, Inc.*, 303 F.3d 1242 (11th Cir. 2002)).

2. Cybersquatting Under 15 U.S.C. § 1125(d) (Count II)

The Anti-Cybersquatting Consumer Protection Act (“ACPA”) protects the owner of a distinctive or famous trademark from another’s bad faith intent to profit from the trademark owner’s mark by registering or using a domain name that is identical or confusingly similar to, or dilutive of, the trademark owner’s mark without regard to the goods or services of the parties. *See* 15 U.S.C. § 1125(d). “To prevail under the ACPA, a plaintiff must prove that (1) its mark is distinctive or famous and entitled to protection; (2) the defendant’s domain name is identical or confusingly similar to the plaintiff’s mark; and (3) the defendant registered or used the domain name with a bad faith intent to profit.” *Bavaro Palace, S.A. v. Vacation Tours, Inc.*, 203 F. App’x 252, 256 (11th Cir. 2006) (citation omitted).

3. Common-Law Trademark Infringement (Count III)

The analysis of Plaintiffs’ common law trademark infringement claim mirrors the analysis of Plaintiffs’ trademark infringement claim under § 32(a) of the Lanham Act. *See Chanel, Inc. v. Sea Hero*, 234 F. Supp. 3d 1255, 1261 (S.D. Fla. 2016).

B. Liability

The well-pled factual allegations of Plaintiffs’ Complaint properly allege the elements for each of the claims described above. *See* ECF No. 1. Moreover, the factual allegations in Plaintiffs’ Complaint have been substantiated by sworn declarations and other evidence and establish Defendants’ liability under each of the claims asserted in the Complaint. Accordingly, default judgment pursuant to Federal Rule of Civil Procedure 55 is appropriate.

C. Injunctive Relief

Pursuant to the Lanham Act, a district court is authorized to issue an injunction “according to the principles of equity and upon such terms as the court may deem reasonable,” to prevent violations of trademark law. *See* 15 U.S.C. § 1116(a). Indeed, “[i]njunctive relief is the remedy of choice for trademark and unfair competition cases, since there is no adequate remedy at law for the injury caused by a defendant’s continuing infringement.” *Burger King Corp. v. Agad*, 911 F. Supp. 1499, 1509-10 (S.D. Fla. 1995) (citation omitted). Even in a default judgment setting, injunctive relief is available. *See e.g., PetMed Express, Inc.*, 336 F. Supp. 2d at 1222-23. Defendants’ failure to respond or otherwise appear in this action makes it difficult for Plaintiffs to prevent further infringement absent an injunction. *See Jackson v. Sturkie*, 255 F. Supp. 2d 1096, 1103 (N.D. Cal. 2003) (“[D]efendant’s lack of participation in this litigation has given the court no assurance that defendant’s infringing activity will cease. Therefore, plaintiff is entitled to permanent injunctive relief.”)

Permanent injunctive relief is appropriate where a plaintiff demonstrates that (1) it has suffered irreparable injury; (2) there is no adequate remedy at law; (3) the balance of hardship favors an equitable remedy; and (4) an issuance of an injunction is in the public’s interest. *eBay, Inc. v. MercExchange, LLC*, 547 U.S. 388, 392-93 (2006). Plaintiffs have carried their burden on each of the four factors. Accordingly, permanent injunctive relief is appropriate.

Specifically, in trademark cases, “a sufficiently strong showing of likelihood of confusion . . . may by itself constitute a showing of a substantial threat of irreparable harm.” *McDonald’s Corp. v. Robertson*, 147 F.3d 1301, 1306 (11th Cir. 1998); *see also Levi Strauss & Co. v. Sunrise Int’l Trading Inc.*, 51 F.3d 982, 986 (11th Cir. 1995) (“There is no doubt that the continued sale of thousands of pairs of counterfeit jeans would damage LS & Co.’s business reputation and might decrease its legitimate sales.”). Plaintiffs’ Complaint alleges that Defendants’ unlawful actions

have caused Plaintiffs irreparable injury and will continue to do so if Defendants are not permanently enjoined. *See* ECF No. 1. Further, the Complaint alleges, and the submissions by Plaintiffs show, that the goods promoted, advertised, offered for sale, and sold by Defendants are nearly identical to Plaintiffs' authentic products and that consumers viewing Defendants' counterfeit goods post-sale would actually confuse them for Plaintiffs' authentic products. *See Id.*

Plaintiffs have no adequate remedy at law so long as Defendants continue to operate the Subject Domain Names, the Internet websites operating thereunder, and the corresponding websites' URLs because Plaintiffs cannot control the quality of what appears to be their products in the marketplace. An award of monetary damages alone will not cure the injury to Plaintiffs' reputation and goodwill that will result if Defendants' infringing and counterfeiting actions are allowed to continue. Moreover, Plaintiffs face hardship from loss of sales and the inability to control their reputation in the marketplace. By contrast, Defendants face no hardship if they are prohibited from the infringement of Plaintiffs' trademarks, which is an illegal act.

Finally, the public interest supports the issuance of a permanent injunction against Defendants to prevent consumers from being misled by Defendants' products. *See Nike, Inc. v. Leslie*, 1985 WL 5251, at *1 (M.D. Fla. June 24, 1985) (“[A]n injunction to enjoin infringing behavior serves the public interest in protecting consumers from such behavior.”). The Court's broad equity powers allow it to fashion injunctive relief necessary to stop Defendants' infringing activities. *See, e.g., Swann v. Charlotte-Mecklenburg Bd. of Educ.*, 402 U.S. 1, 15 (1971) (“Once a right and a violation have been shown, the scope of a district court's equitable powers to remedy past wrongs is broad, for . . . [t]he essence of equity jurisdiction has been the power of the Chancellor to do equity and to mould each decree to the necessities of the particular case.” (citation and internal quotation marks omitted)); *United States v. Bausch & Lomb Optical Co.*, 321 U.S. 707, 724 (1944) (“Equity has power to eradicate the evils of a condemned scheme by prohibition

of the use of admittedly valid parts of an invalid whole.”). District courts are expressly authorized to order the transfer or surrender of domain names in an in rem action against a domain name. *See* 15 U.S.C. § 1125(d)(1)(C), (d)(2). However, courts have not limited the remedy to that context. *See Ford Motor Co. v. Cross*, 441 F. Supp. 2d 837, 853 (E.D. Mich. 2006) (ordering the defendants to disclose all other domain registrations held by them and to transfer registration of a particular domain name to plaintiff in part under authority of 15 U.S.C. § 1116(a)).

Defendants have created an Internet-based counterfeiting scheme in which they are profiting from their deliberate misappropriation of Plaintiffs’ rights. Accordingly, the Court may fashion injunctive relief to eliminate the means by which Defendants are conducting their unlawful activities. Ordering the cancellation or transfer of the domain names at issue to Plaintiffs so they may be disabled from further use as platforms for the sale of counterfeit goods is appropriate to achieve this end.

D. Statutory Damages for the Use of Counterfeit Marks

In a case involving the use of counterfeit marks in connection with a sale, offering for sale, or distribution of goods, 15 U.S.C. § 1117(c) provides that a plaintiff may elect an award of statutory damages at any time before final judgment is rendered in the sum of not less than \$1,000.00 nor more than \$200,000.00 per counterfeit mark per type of good. 15 U.S.C. § 1117(c)(1). In addition, if the Court finds that Defendants’ counterfeiting actions were willful, it may impose damages above the maximum limit up to \$2,000,000.00 per mark per type of good. 15 U.S.C. § 1117(c)(2). Pursuant to 15 U.S.C. § 1117(c), Plaintiffs have elected to recover an award of statutory damages as to Count I of the Complaint.

The Court has wide discretion to determine the amount of statutory damages. *PetMed Express, Inc.*, 336 F. Supp. 2d at 1219 (citing *Cable/Home Commc'n Corp. v. Network Prod., Inc.*, 902 F.2d 829, 852 (11th Cir. 1990)). An award of statutory damages is appropriate despite a plaintiff's inability to prove actual damages caused by a defendant's infringement. *Under Armour, Inc. v. 51nfljersey.com*, 2014 WL 1652044, at *7 (S.D. Fla. April 23, 2014) (citing *Ford Motor Co. v. Cross*, 441 F. Supp. 2d 837, 852 (E.D. Mich. 2006) (“[A] successful plaintiff in a trademark infringement case is entitled to recover enhanced statutory damages even where its actual damages are nominal or non-existent.”)); *Playboy Enter., Inc. v. Universal Tel-A-Talk, Inc.*, 1998 WL 767440, at *8 (E.D. Pa. Nov. 3, 1998) (awarding statutory damages where plaintiff failed to prove actual damages or profits). Indeed, Congress enacted a statutory damages remedy in trademark counterfeiting cases because evidence of a defendant's profits in such cases is almost impossible to ascertain. *See, e.g., S. REP. NO. 104-177, pt. V(7) (1995)* (discussing purposes of Lanham Act statutory damages); *see also PetMed Express, Inc.*, 336 F. Supp. 2d at 1220 (statutory damages are “especially appropriate in default judgment cases due to infringer nondisclosure”). This case is no exception.

This Court may award statutory damages “without holding an evidentiary hearing based upon affidavits and other documentary evidence if the facts are not disputed.” *Perry Ellis Int'l, Inc. v. URI Corp.*, 2007 WL 3047143, at *1 (S.D. Fla. Oct. 18, 2007). Although the Court is permitted to conduct a hearing on a default judgment in regards to damages pursuant to Federal Rule of Civil Procedure 55(b)(2)(B), an evidentiary hearing is not necessary where there is sufficient evidence on the record to support the request for damages. *See SEC v. Smyth*, 420 F.3d 1225, 1232 n.13 (11th Cir. 2005) (“Rule 55(b)(2) speaks of evidentiary hearings in a permissive tone . . . We have held that no such hearing is required where all essential evidence is already of record.”) (citations omitted); *see also PetMed Express*, 336 F. Supp. 2d at 1223 (entering default

judgment, permanent injunction and statutory damages in a Lanham Act case without a hearing). Here, the allegations in the Complaint, which are taken as true, clearly establish Defendants intentionally copied one or more of the Tapestry Marks for the purpose of deriving the benefit of Plaintiffs' famous reputation. As such, the Lanham Act permits the Court to award up to \$2,000,000.00 per infringing mark on each type of good as statutory damages to ensure that Defendants do not continue their intentional and willful counterfeiting activities.

The evidence in this case demonstrates that each Defendant promoted, distributed, advertised, offered for sale, and/or sold goods bearing marks which were in fact counterfeits of at least one of the Tapestry Marks. *See* ECF No. 1. Based on the above considerations, Plaintiffs suggest the Court award statutory damages of \$500,000 against each Defendant. The award should be sufficient to deter Defendants and others from continuing to counterfeit or otherwise infringe Plaintiffs' trademarks, compensate Plaintiffs, and punish Defendants, all stated goals of 15 U.S.C. § 1117(c). The Court finds that this award of statutory damages falls within the permissible statutory range under 15 U.S.C. § 1117(c) and is just.

Plaintiffs' Complaint also sets forth a cause of action for cybersquatting pursuant to the ACPA, 15 U.S.C. §1125(d). As admitted by default, and established by the evidence submitted, certain Defendants have acted with the bad-faith intent to profit from at least one of the Tapestry Marks and the goodwill associated with the Tapestry Marks by registering their respective Subject Domain Names (collectively, the "Cybersquatted Subject Domain Names"). *See* Motion at 15-17. Each of the Cybersquatted Subject Domain Names incorporates one or more of the Tapestry Marks in its entirety, surrounded by descriptive or generic terms, rendering the domain names nearly identical to the Tapestry Marks.

Upon a finding of liability, the ACPA expressly empowers the Court to "order the forfeiture or cancellation of the domain name or the transfer of the domain name to the owner of the mark."

15 U.S.C. § 1125(d)(1)(c); *Victoria's Cyber Secret Ltd. P'ship v. Secret Catalogue, Inc.*, 161 F. Supp. 2d 1339, 1356 (S.D. Fla. 2001). Accordingly, Plaintiffs are entitled to the transfer and ownership of Defendants' Cybersquatted Subject Domain Names because they are confusingly similar to at least one of the Tapestry Marks.

Additionally, Plaintiffs may elect at any time before final judgment to recover actual damages or statutory damages of not less than \$1,000.00 and not more than \$100,000.00 per domain name, as the court considers just. 15 U.S.C. § 1117(d). Plaintiffs have elected statutory damages and respectfully requests, in view of Defendants' intentional, wrongful behavior, an award in the amount of \$10,000.00 for each of the Cybersquatted Subject Domain Names. *See* Motion at 15-17. *See Taverna Opa Trademark Corp. v. Ismail*, 2010 WL 1838384, at *3 (S.D. Fla. May 6, 2010) (awarding \$10,000.00 in statutory damages for domain name at issue). The Court finds that this amount is reasonable and, therefore, awards such damages.

Plaintiffs' Complaint further sets forth a cause of action under Florida's common law trademark infringement (Count III). Judgment on Count III is limited to the amount awarded pursuant to Count I and entry of the requested equitable relief.

CONCLUSION

Based on the foregoing, it is ORDERED AND ADJUDGED that Plaintiffs' Motion, ECF No. 25, is GRANTED against those Defendants listed in the attached Schedule "A." Final Default Judgment will be entered by separate Order.

DONE AND ORDERED in Miami, Florida, this ____ day of _____, 2018.

Robert N. Scola, Jr.
United States District Judge

SCHEDULE "A"
DEFENDANTS BY NUMBER AND SUBJECT DOMAIN NAME

| Defendant Number | Defendant / Domain Name |
|-------------------------|---|
| 1 | 2012coachoutlets.com |
| 2 | Cheapcoachoutlet.net |
| 2 | Cheapercoachoutlet.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 | Coachbagofficialsite.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 |

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| 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”

C-1 Defendant Number 1 - 2012coachoutlets.com

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| 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

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| 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

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| 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

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| 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

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| 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

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| 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

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| 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

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| 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

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| 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

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

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

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| 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

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| http://www.coachbags-outlet2017.org/ |
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C-21 Defendant Number 20 - coachhandbagsshop.us.com

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

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

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

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C-28 Defendant Number 12 - Coachbagsforcheap.com

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C-29 Defendant Number 25 - Coachbagsonsaleoutlet.com

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C-31 Defendant Number 27 - Coachoutletonlineestoresinc.com

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C-36 Defendant Number 34- Coachsaleus.com

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C-41 Defendant Number 39 - *Hotbagsstore.com*

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C-54 Defendant Number 53 - Shopcoach.us

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