

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.**

BURBERRY LIMITED, A UNITED
KINGDOM COMPANY, and BURBERRY
LIMITED, A NEW YORK CORPORATION,

Plaintiffs,

vs.

THE INDIVIDUALS, BUSINESS ENTITIES,
AND UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE "A,"

Defendants.

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

Plaintiffs, Burberry Limited, a United Kingdom company, and Burberry Limited, a New York corporation (collectively "Plaintiffs" or "Burberry") hereby sue Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule "A" (collectively "Defendants"). Defendants are promoting, selling, offering for sale, and/or distributing goods bearing and/or using counterfeits and confusingly similar imitations of Burberry's trademarks within this district through various Internet based e-commerce stores operating under the seller names set forth on Schedule "A" (the "E-commerce Store Names"). In support of its claims, Burberry alleges as follows:

JURISDICTION AND VENUE

1. This is an action for damages and injunctive relief for federal trademark counterfeiting and infringement, false designation of origin, common law unfair competition, and common law trademark infringement pursuant to 15 U.S.C. §§ 1114, 1116, and 1125(a), The All Writs Act, 28 U.S.C §1651(a) and Florida's common law. Accordingly, this Court has subject

matter jurisdiction over this action pursuant to 15 U.S.C. § 1121 and 28 U.S.C. §§ 1331 and 1338. This Court has supplemental jurisdiction pursuant to 28 U.S.C. § 1367 over Burberry's state law claims because those claims are so related to the federal claims that they form part of the same case or controversy.

2. Defendants are subject to personal jurisdiction in this district, because they direct business activities toward and conduct business with consumers throughout the United States, including within the State of Florida and this district through, at least, the Internet based e-commerce stores accessible and doing business in Florida and operating under their E-commerce Store Names. Alternatively, based on their overall contacts with the United States, Defendants are subject to personal jurisdiction in this district pursuant to Federal Rule of Civil Procedure 4(k)(2) because (i) Defendants are not subject to jurisdiction in any state's court of general jurisdiction; and (ii) exercising jurisdiction is consistent with the United States Constitution and laws.

3. Venue is proper in this Court pursuant to 28 U.S.C. § 1391 since Defendants are, upon information and belief, non-residents in the United States and engaged in infringing activities and causing harm within this district by advertising, offering to sell, selling, and/or shipping infringing products into this district.

THE PLAINTIFFS

4. Plaintiff Burberry Limited is a company duly organized and existing under the laws of the United Kingdom with its principal place of business at Horseferry House, Horseferry Road, London, SW1P 2AW, United Kingdom ("Burberry Limited (UK)"). Plaintiff Burberry Limited is a corporation duly organized pursuant to the laws of the State of New York with its principal place of business at 11 West 42nd Street, New York, New York, 10036 ("Burberry Limited (US)"). Collectively, Burberry Limited (UK) and Burberry Limited (US) are referred to herein as

“Burberry.” Burberry is, in part, engaged in the business of manufacturing and distributing throughout the world, including within this district, a variety of high-quality goods under multiple world-famous common law and federally registered trademarks including those identified in Schedule “B” hereto, as discussed in Paragraph 15 below. Burberry offers for sale and sells its trademarked goods within the State of Florida, including this district and throughout the United States. Defendants, through the offer to sell and sale of counterfeit and infringing versions of Burberry-branded products, are directly and unfairly competing with Burberry’s economic interests in the United States, including within the State of Florida and causing Burberry irreparable harm and damage within this jurisdiction.

5. Like many other famous trademark owners in the high-quality goods market, Burberry suffers ongoing daily and sustained violations of their trademark rights at the hands of counterfeiters and infringers, such as Defendants herein, who wrongfully reproduce, copy, and/or counterfeit Burberry’s trademarks for the twin purposes of (i) duping and confusing the consuming public and (ii) earning substantial profits across their e-commerce stores. The natural and intended byproduct of Defendants’ combined actions is the erosion and destruction of the goodwill associated with Burberry’s name and associated intellectual properties and the destruction of the legitimate market sector in which it operates.

6. To combat the indivisible harm caused by the concurrent actions of Defendants and others engaging in similar conduct, each year Burberry expends significant monetary resources in connection with intellectual property enforcement efforts, including legal fees and investigative fees. The exponential growth of counterfeiting over the Internet, including through online marketplace platforms and social media websites, has created an environment that requires companies, such as Burberry, to expend significant resources across a wide spectrum of efforts to

protect both consumers and itself from confusion and the erosion of the goodwill embodied in Burberry's brand.

THE DEFENDANTS

7. Defendants are individuals, business entities of unknown makeup, or unincorporated associations each of whom, upon information and belief, either reside and/or operate in foreign jurisdictions or redistribute products from the same or similar sources in those locations. Defendants have the capacity to be sued pursuant to Federal Rule of Civil Procedure 17(b). Defendants target their business activities toward consumers throughout the United States, including within this district, through the simultaneous operation of, at least, their commercial Internet based e-commerce stores under the E-commerce Store Names.

8. Certain Defendants operate under their respective E-commerce Store Names in tandem with electronic communication via private messaging applications and/or services, thereby creating an interconnected ecosystem which functions as an online marketplace operation.

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

10. Defendants are the past and/or present controlling forces behind the sale of products bearing and/or using counterfeits and infringements of Burberry's trademarks as described herein.

11. Defendants directly engage in unfair competition with Burberry by advertising, offering for sale, and selling goods each bearing and/or using counterfeits and infringements of one or more of Burberry's trademarks to consumers within the United States and this district through Internet based e-commerce stores using, at least, the E-commerce Store Names, as well as additional e-commerce store or seller identification aliases not yet known to Burberry. Defendants have purposefully directed some portion of their unlawful activities towards consumers in the State

of Florida through the advertisement, offer to sell, sale, and/or shipment of counterfeit and infringing versions of Burberry-branded goods into the State.

12. Defendants have registered, established, or purchased, and maintained their E-commerce Store Names. Defendants may have engaged in fraudulent conduct with respect to the registration or maintenance of the E-commerce Store Names by providing false and/or misleading information to the relevant e-commerce platforms where they offer to sell and/or sell.

13. Defendants will likely continue to register or acquire new e-commerce store names or other aliases, as well as related payment accounts, for the purpose of selling and/or offering for sale goods bearing and/or using counterfeit and confusingly similar imitations of one or more of Burberry's trademarks unless preliminarily and permanently enjoined.

14. Defendants' E-commerce Store Names, associated payment accounts, and any other alias e-commerce store or seller identification names used in connection with the sale of counterfeit and infringing goods bearing and/or using one or more of Burberry's trademarks are essential components of Defendants' online activities and are one of the means by which Defendants further their counterfeiting and infringement schemes and cause harm to Burberry. Moreover, Defendants are using Burberry's famous brand name and/or trademarks to drive Internet consumer traffic to at least one of their e-commerce stores operating under the E-commerce Store Names, thereby increasing the value of the E-commerce Store Names and decreasing the size and value of Burberry's legitimate marketplace and intellectual property rights at Burberry's expense.

COMMON FACTUAL ALLEGATIONS

Burberry's Business and Intellectual Property Rights

15. Burberry is the owner of all rights in and to the trademarks identified on Schedule

“B” hereto, which are valid and registered on the Principal Register of the United States Patent and Trademark Office (collectively the “Burberry Marks”).

16. The Burberry Marks are used in connection with the manufacture and distribution of high-quality goods in the categories identified in Schedule “B.” True and correct copies of the Certificates of Registration for the Burberry Marks are attached hereto as Composite Exhibit “1.”

17. The Burberry Marks has been used in interstate commerce to identify and distinguish Burberry’s high-quality goods for an extended period of time.

18. The Burberry Marks have been used by Burberry in commerce long prior in time to Defendants’ use of copies of those marks. The Burberry Marks have never been assigned or licensed to any of the Defendants in this matter.

19. The Burberry Marks are symbols of Burberry’s quality, reputation, and goodwill and have never been abandoned. Burberry has carefully monitored and policed the use of the Burberry Marks.

20. The Burberry Marks is well known and famous and have been for many years. Burberry expends substantial resources developing, advertising, and otherwise promoting the Burberry Marks. The Burberry Marks qualify as famous marks as that term is used in 15 U.S.C. § 1125(c)(1).

21. Burberry extensively uses, advertises, and promotes the Burberry Marks in the United States in connection with the sale of high-quality goods. Burberry has expended substantial resources to extensively advertise and promote its goods and associated trademarks.

22. As a result of Burberry’s efforts, consumers readily identify merchandise bearing or sold using the Burberry Marks as being high-quality goods sponsored and approved by Burberry.

23. Accordingly, the Burberry Marks have achieved secondary meaning among consumers as identifiers of high-quality goods.

24. Genuine goods bearing and/or using the Burberry Marks are widely legitimately advertised, promoted, and offered for sale by Burberry, its authorized distributors, and unrelated third parties via the Internet. Visibility on the Internet, particularly via Internet search engines and social media platforms, is important to Burberry's overall marketing and consumer education efforts. Thus, Burberry expends significant monetary and other resources on Internet marketing, including search engine optimization ("SEO") strategies, search engine marketing ("SEM") strategies, and social media strategies. Those strategies allow Burberry and its authorized retailers to educate consumers fairly and legitimately about the value associated with the Burberry brand and the goods sold thereunder and the problems associated with counterfeiting the Burberry Marks. Similarly, some of Defendants' e-commerce stores are indexed on search engines and compete directly with Burberry for space and consumer attention in the search results.

Defendants' Infringing Activities

25. Defendants are each promoting, advertising, distributing, offering for sale, and/or selling goods in interstate commerce bearing and/or using counterfeit and confusingly similar imitations of one or more of the Burberry Marks (the "Counterfeit Goods") through at least the e-commerce stores operating under the E-commerce Store Names. Specifically, Defendants are each using the Burberry Marks to initially attract online consumers and drive them to Defendants' e-commerce stores operating under their E-commerce Store Names. Defendants are each using identical copies of one or more of the Burberry Marks for different quality goods. Burberry has used the Burberry Marks extensively and continuously before Defendants began offering counterfeit and confusingly similar imitations of Burberry's merchandise.

26. Defendants' Counterfeit Goods are of a quality substantially different than that of Burberry's genuine goods. Defendants are actively using, promoting and otherwise advertising, distributing, offering for sale, and/or selling substantial quantities of their Counterfeit Goods with the knowledge and intent that such goods will be mistaken for the genuine high-quality goods offered for sale by Burberry, despite Defendants' knowledge that they are without authority to use the Burberry Marks. The net effect of Defendants' actions is likely to cause confusion of consumers at the time of initial interest, sale, and in the post-sale setting, who will believe all of Defendants' goods offered for sale in or through Defendants' e-commerce stores are genuine goods originating from, associated with, and/or approved by Burberry.

27. Defendants advertise their e-commerce stores, including their Counterfeit Goods offered for sale, to the consuming public via e-commerce stores on, at least, the E-commerce Store Names. In so doing, Defendants improperly and unlawfully use one or more of the Burberry Marks without Burberry's permission.

28. Defendants are concurrently employing and benefiting from substantially similar advertising and marketing strategies based, in large measure, upon an unauthorized use of counterfeits and infringements of the Burberry Marks. Specifically, Defendants are using counterfeits and infringements of Burberry's famous name and the Burberry Marks to make their e-commerce stores selling unauthorized goods appear more relevant and attractive to consumers searching for both Burberry and non-Burberry goods and information online. By their actions, Defendants are jointly contributing to the creation and maintenance of an unlawful marketplace operating in parallel to the legitimate marketplace for Burberry's genuine goods. Defendants are causing individual, concurrent, and indivisible harm to Burberry and the consuming public by (i) depriving Burberry and other third parties of their right to fairly compete for space online and

within search engine results and reducing the visibility of Burberry's genuine goods on the World Wide Web, (ii) causing an overall degradation of the value of the goodwill associated with the Burberry Marks by viewing inferior products in either the pre or post sale setting, and/or (iii) increasing Burberry's overall cost to market its goods and educate consumers about its brand via the Internet.

29. Defendants are concurrently conducting and targeting their counterfeiting and infringing activities toward consumers and likely causing unified harm within this district and elsewhere throughout the United States. As a result, Defendants are defrauding Burberry and the consuming public for Defendants' own benefit.

30. At all times relevant hereto, Defendants have had full knowledge of Burberry's ownership of the Burberry Marks, including its exclusive right to use and license such intellectual property and the goodwill associated therewith.

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

32. Defendants are engaging in the above-described unlawful counterfeiting and infringing activities knowingly and intentionally or with reckless disregard or willful blindness to Burberry's rights for the purpose of trading on Burberry's goodwill and reputation. If Defendants' intentional counterfeiting and infringing activities are not preliminarily and permanently enjoined by this Court, Burberry and the consuming public will continue to be harmed.

33. Defendants' above identified infringing activities are likely to cause confusion, deception, and mistake in the minds of consumers before, during and after the time of purchase. Moreover, Defendants' wrongful conduct is likely to create a false impression and deceive

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

34. Although Defendants are being named individually, Burberry has good cause to believe the E-commerce Store Names are all operated and/or controlled by the same individual and/or organization.

35. At the very least, it is clear that Defendants are either affiliated given the visibility of Defendants' various e-commerce stores and the similarity of their actions, or at a minimum, cannot help but know of each other's existence and the unified harm likely to be caused to Burberry and the overall consumer market in which they operate because of Defendants' concurrent actions.

36. Although some Defendants may be physically acting independently, they may properly be deemed to be acting in concert because the combined force of their actions serves to multiply the harm caused to Burberry.

37. Defendants' payment and financial accounts, including but not limited to those specifically set forth on Schedule "A," are being used by Defendants to accept, receive, and deposit profits from Defendants' trademark counterfeiting and infringing and unfairly competitive activities connected to their E-commerce Store Names, and any other alias e-commerce store names being used and/or controlled by them.

38. Further, Defendants, upon information and belief, are likely to transfer or secret their assets to avoid payment of any monetary judgment awarded to Burberry.

39. Burberry has no adequate remedy at law.

40. Burberry is suffering irreparable injury and has suffered substantial damages because of Defendants' unauthorized and wrongful use of the Burberry Marks. If Defendants' intentional counterfeiting, infringing, and unfairly competitive activities are not preliminarily and

permanently enjoined by this Court, Burberry and the consuming public will continue to be harmed while Defendants wrongfully earn a substantial profit.

41. The harm and damages sustained by Burberry has been directly and proximately caused by Defendants' wrongful reproduction, use, advertisement, promotion, offers to sell, and sale of their Counterfeit Goods.

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

42. Burberry hereby adopts and re-alleges the factual allegations set forth in Paragraphs 1 through 41 above.

43. This is an action for trademark counterfeiting and infringement against Defendants based on their use of counterfeit and confusingly similar imitations of the Burberry Marks in commerce in connection with the promotion, advertisement, distribution, offering for sale, and sale of the Counterfeit Goods.

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

45. Defendants' concurrent counterfeiting and infringing activities are likely to cause and are causing confusion, mistake, and deception among members of the trade and the general consuming public as to the origin and quality of Defendants' Counterfeit Goods.

46. Defendants' unlawful actions have caused and are continuing to cause unquantifiable damages and irreparable harm to Burberry and are unjustly enriching Defendants with profits at Burberry's expense.

47. Defendants' above-described unlawful actions constitute counterfeiting and infringement of the Burberry Marks in violation of Burberry's rights under § 32 of the Lanham Act, 15 U.S.C. § 1114.

48. Burberry has suffered and will continue to suffer irreparable injury and damages while Defendants are earning a substantial profit due to Defendants' above-described activities if Defendants are not preliminarily and permanently enjoined.

COUNT II - FALSE DESIGNATION OF ORIGIN
PURSUANT TO § 43(a) OF THE LANHAM ACT (15 U.S.C. § 1125(a))

49. Burberry hereby adopts and re-alleges the factual allegations set forth in Paragraphs 1 through 41 above.

50. Defendants' Counterfeit Goods bearing, offered for sale, and sold using copies of one or more of the Burberry Marks have been widely advertised and offered for sale throughout the United States via the Internet under the E-commerce Store Names.

51. Defendants' Counterfeit Goods bearing, offered for sale, and sold using copies of one or more of the Burberry Marks are virtually identical in appearance to Burberry's genuine goods. However, Defendants' Counterfeit Goods are different in quality. Accordingly, Defendants' activities are likely to cause confusion among consumers as to at least the origin or sponsorship of their Counterfeit Goods.

52. Defendants have used in connection with their advertisement, offer for sale, and sale of their Counterfeit Goods, false designations of origin and false descriptions and representations, including words or other symbols and designs that falsely describe or represent such goods and have caused such goods to enter into commerce in the United States with full knowledge of the falsity of such designations of origin and such descriptions and representations, all to Burberry's detriment.

53. Defendants have each authorized infringing uses of one or more of the Burberry Marks in Defendants' advertisement and promotion of their counterfeit and infringing branded goods. Some Defendants have also misrepresented to members of the consuming public that the Counterfeit Goods they advertise and sell are genuine, non-infringing goods.

54. Additionally, Defendants are simultaneously using counterfeits and infringements of one or more of the Burberry Marks to unfairly compete with Burberry and others for space within organic and paid search engine and social media results. Defendants are thereby jointly (i) depriving Burberry of valuable marketing and educational space online, which would otherwise be available to Burberry, and (ii) reducing the visibility of Burberry's genuine goods on the World Wide Web and across social media platforms.

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

56. Burberry has no adequate remedy at law and has sustained both individual and indivisible injury and damages caused by Defendants' concurrent conduct. Absent an entry of an injunction by this Court, Burberry will continue to suffer irreparable injury to its goodwill and business reputation, as well as monetary damages, while Defendants are unjustly profiting.

COUNT III - COMMON LAW UNFAIR COMPETITION.

57. Burberry hereby adopts and re-alleges the factual allegations set forth in Paragraphs 1 through 41 above.

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

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

60. Defendants' infringing activities are likely to cause and are causing confusion, mistake, and deception among consumers as to the origin and quality of Defendants' e-commerce stores as a whole and all products sold therein by their use of the Burberry Marks.

61. Burberry has no adequate remedy at law and has suffered and will continue to suffer irreparable injury and damages because of Defendants' concurrent actions while Defendants are unjustly profiting due to their above-described activities if Defendants are not preliminarily and permanently enjoined.

COUNT V - COMMON LAW TRADEMARK INFRINGEMENT

62. Burberry hereby adopts and re-alleges the factual allegations set forth in Paragraphs 1 through 41 above.

63. Burberry is the owner of all common law rights in and to the Burberry Marks.

64. This is an action for common law trademark infringement against Defendants based on their promotion, advertisement, offering for sale, and sale of their Counterfeit Goods bearing and/or using one or more of the Burberry Marks.

65. Specifically, each Defendant is promoting and otherwise advertising, distributing, offering for sale, and selling goods bearing and/or using infringements of one or more of the Burberry Marks.

66. Defendants' infringing activities are likely to cause and are causing confusion, mistake, and deception among consumers as to the origin and quality of Defendants' Counterfeit Goods bearing and/or using the Burberry Marks.

67. Burberry has no adequate remedy at law and has suffered and will continue to suffer irreparable injury and damages because of Defendants' concurrent actions while Defendants are unjustly profiting due to their above-described activities if Defendants are not preliminarily and permanently enjoined.

PRAYER FOR RELIEF

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

a. Entry of temporary, preliminary, and permanent injunctions pursuant to 15 U.S.C. § 1116, 28 U.S.C. § 1651(a), The All Writs Act, and Federal Rule of Civil Procedure 65 enjoining Defendants, their agents, representatives, servants, employees, and all those acting in concert or participation therewith, from manufacturing or causing to be manufactured, importing, advertising or promoting, distributing, selling, or offering to sell their Counterfeit Goods; from infringing, counterfeiting, or diluting the Burberry Marks; from using the Burberry Marks, or any mark or design similar thereto, in connection with the sale of any unauthorized goods; from using any logo, trade name, trademark, or design that may be calculated to falsely advertise the services or goods of Defendants as being sponsored by, authorized by, endorsed by, or in any way associated with Plaintiffs; from falsely representing themselves as being connected with Plaintiffs, through sponsorship or association, or engaging in any act that is likely to falsely cause members of the trade and/or of the purchasing public to believe any goods or services of Defendants, are in any way endorsed by, approved by, and/or associated with Plaintiffs; from using any reproduction,

counterfeit, infringement, copy, or colorable imitation of the Burberry Marks in connection with the publicity, promotion, sale, or advertising of any goods sold by Defendants; from affixing, applying, annexing, or using in connection with the sale of any goods, a false description or representation, including words or other symbols tending to falsely describe or represent Defendants' goods as being those of Plaintiffs, or in any way endorsed by Plaintiffs and from offering such goods in commerce; from engaging in search engine optimization strategies using colorable imitations of Plaintiffs' names, or trademarks and from otherwise unfairly competing with Plaintiffs.

b. Entry of a temporary restraining order, as well as preliminary and permanent injunctions pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority enjoining Defendants and all third parties with actual notice of an injunction issued by the Court from participating in, including providing financial services, technical services, or other support to Defendants in connection with the sale and distribution of non-genuine goods bearing and/or using counterfeits and/or infringements of the Burberry Marks.

c. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and this Court's inherent authority that, upon Plaintiffs' request, those acting in concert or participation as service providers to Defendants, who have notice of the injunction, cease hosting, facilitating access to, or providing any supporting service to any and all e-commerce stores, including but not limited to the E-commerce Store Names, through which Defendants engage in the promotion, offering for sale and/or sale of goods bearing and/or using counterfeits and/or infringements of Plaintiffs' Marks.

d. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority authorizing Plaintiffs to serve the injunction on the e-commerce

store's registrar(s) and/or the privacy protection service(s) for the E-commerce Store Names to disclose to Plaintiffs the true identities and contact information for the registrants of the E-commerce Store Names.

e. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and this Court's inherent authority that, upon Plaintiffs' request, any Internet marketplace website operators, administrators, registrars, and/or top level domain (TLD) Registries for the E-commerce Store Names and any other alias e-commerce store names being used by Defendants who are provided with notice of an injunction issued by the Court identify any e-mail address known to be associated with Defendants' E-commerce Store Names.

f. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, authorizing Plaintiffs to serve an injunction issued by the Court on any e-mail service provider with a request that the service provider permanently suspend the e-mail addresses that are or have been used by Defendants in connection with Defendants' promotion, offering for sale, and/or sale of goods bearing and/or using counterfeits, and/or infringements of the Burberry Marks.

g. Entry of an Order pursuant to 15 U.S.C. § 1116, 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, that upon Burberry's request, Defendants and the top level domain (TLD) Registry for each of the E-commerce Store Names, and any other e-commerce stores used by Defendants, or their administrators, including backend registry operators or administrators, place the E-commerce Store Names, and any other e-commerce store names being used and/or controlled by Defendants to engage in the business of marketing, offering to sell, and/or selling goods bearing and/or using counterfeits and infringements of the Burberry Marks on Registry Hold status for the remainder of the registration period for any such e-

commerce store, thus removing them from the TLD zone files that link the E-commerce Store Names, and any other e-commerce store names used by Defendants, to the IP addresses where the associated e-commerce store names are hosted.

h. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and the Court's inherent authority, canceling for the life of the current registration or, at Burberry's election, transferring the E-commerce Store Names, and any other e-commerce store names used by Defendants to engage in their counterfeiting of the Burberry Marks at issue, to Burberry's control so they may no longer be used for unlawful purposes.

i. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act and the Court's inherent authority authorizing Burberry to request any Internet search engines or service provider referring or linking users to any Uniform Resource Locator ("URL") of the E-commerce Store Names, which are provided with notice of the order, to permanently disable, de-index or delist all URLs of the E-commerce Store Names and/or permanently disable the references or links to all URLs of the E-commerce Store Names used by Defendants to promote, offer for sale and/or sell goods bearing and/or using counterfeits and/or infringements of the Burberry Marks, based upon Defendants' unlawful activities being conducted via the E-commerce Store Names as a whole and via any specific URLs identified by Burberry.

j. Entry of an Order pursuant to 15 U.S.C. § 1116 and the Court's inherent authority, requiring Defendants, their agent(s) or assign(s), to assign all rights, title, and interest, to their E-commerce Store Name(s), and any other e-commerce store names used by Defendants, to Burberry and, if within five (5) days of entry of such Order Defendants fail to make such an assignment, the Court order the act to be done by another person appointed by the Court at

Defendants' expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a).

k. Entry of an Order pursuant to 15 U.S.C. § 1116 and the Court's inherent authority, requiring Defendants, their agent(s) or assign(s), to instruct in writing all search engines to permanently delist or deindex the E-commerce Store Name(s), any other e-commerce store names used by Defendants, and, if within five (5) days of entry of such Order Defendants fail to make such a written instruction, the Court order the act to be done by another person appointed by the Court at Defendants' expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a).

l. Entry of an Order pursuant to 15 U.S.C. § 1116 and the Court's inherent authority, requiring Defendants, their agent(s) or assign(s) to instruct the Registrar(s) for each E-commerce Store Name(s) in writing to permanently close the registration account(s) in which any E-commerce Store Name(s) are located and, if within five (5) days of entry of such Order Defendants fail to make such a written instruction, the Court order the act to be done by another person appointed by the Court at Defendants' expense, such as the Clerk of Court, pursuant to Federal Rule of Civil Procedure 70(a).

m. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and this Court's inherent authority that, upon Burberry's request, any messaging service and Internet marketplace website operators and/or administrators who are provided with notice of an injunction issued by the Court, permanently remove any and all listings and associated images of goods bearing and/or using counterfeits and/or infringements of the Burberry Marks via the e-commerce stores operating under the E-commerce Store Names, and upon Burberry's request, any other listings and images of goods bearing and/or using counterfeits and/or infringements of the

Burberry Marks associated with or linked to the same sellers or linked to any other alias e-commerce store names being used and/or controlled by Defendants to promote, offer for sale and/or sell goods bearing and/or using counterfeits and/or infringements of the Burberry Marks.

n. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, Federal Rule of Civil Procedure 65, and this Court's inherent authority that, upon Burberry's request, Defendants and any Internet platform or marketplace website operators and/or administrators of the E-commerce Store Names who are provided with notice of an injunction issued by the Court, immediately cease fulfillment of and sequester all goods of each Defendant bearing one or more of the Burberry Marks in its inventory, possession, custody, or control, and surrender those goods to Burberry.

o. Entry of an Order requiring, upon Burberry's request, Defendants to request in writing permanent termination of any messaging services, e-commerce store names, usernames, and social media accounts they own, operate, or control on any messaging service, e-commerce marketplace, and social media website.

p. Entry of an Order requiring Defendants to account to and pay Burberry for all profits and damages resulting from Defendants' trademark counterfeiting and infringing and unfairly competitive activities and that the award to Burberry be trebled, as provided for under 15 U.S.C. § 1117, or that Burberry be awarded statutory damages from each Defendant in the amount of two million dollars (\$2,000,000.00) per each counterfeit trademark used and product type offered for sale or sold, as provided by 15 U.S.C. § 1117(c)(2) of the Lanham Act.

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

r. Entry of an Order pursuant to 15 U.S.C. § 1116, 28 U.S.C. § 1651(a), The All Writs Act, Federal Rule of Civil Procedure 65, and the Court's inherent authority that, upon Burberry's request, Defendants and any financial institutions, payment processors, banks, escrow services, money transmitters, e-commerce shipping partner, fulfillment center, warehouse, storage facility, or marketplace platforms, and their related companies and affiliates, identify, restrain, and be required to surrender to Burberry all funds, up to and including the total amount of judgment, in all financial accounts and/or sub-accounts used in connection with the E-commerce Store Names, or other alias e-commerce store names used by Defendants presently or in the future, as well as any other related accounts of the same customer(s) and any other accounts which transfer funds into the same financial institution account(s), and remain restrained until such funds are surrendered to Burberry in partial satisfaction of the monetary judgment entered herein.

s. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, and this Court's inherent authority that, upon Burberry's request, the applicable governing operators and/or administrators for the E-commerce Store Names who are provided with notice of an injunction issued by the Court, disable and/or cease facilitating access to the E-commerce Store Names and any other alias e-commerce store names being used and/or controlled by Defendants to engage in the business of marketing, offering to sell, and/or selling goods bearing and/or using counterfeits and/or infringements of the Burberry Marks.

t. Entry of an award of pre-judgment interest on the judgment amount.

u. Entry of an Order requiring Defendants, at Burberry's request, to pay the cost necessary to correct any erroneous impression the consuming public may have received or derived concerning the nature, characteristics, or qualities of Defendants' products, including

without limitation, the placement of corrective advertising and providing written notice to the public.

v. Entry of an Order for any further relief as the Court may deem just and proper.

DATED: April 16, 2025.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **Stephen M. Gaffigan**

Stephen M. Gaffigan (Fla. Bar No. 025844)

Virgilio Gigante (Fla. Bar No. 082635)

T. Raquel Wiborg-Rodriguez (Fla. Bar No. 103372)

Christine Ann Daley (Fla. Bar No. 98482)

Annie O'Leary (Fla. Bar No. 1050009)

401 East Las Olas Blvd., Suite 130-453

Ft. Lauderdale, Florida 33301

Telephone: (954) 767-4819

E-mail: Stephen@smgpa.cloud

E-mail: Leo@smgpa.cloud

E-mail: Raquel@smgpa.cloud

E-mail: Christine@smgpa.cloud


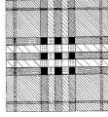
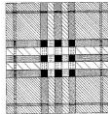
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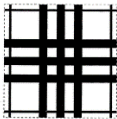
Attorneys for Plaintiffs


SCHEDULE "A"

[This page is the subject of Plaintiffs' Motion to File Under Seal. As such, this page has been redacted in accordance with L.R. 5.4(b)(1)]

SCHEDULE "B"
BURBERRY'S FEDERALLY REGISTERED TRADEMARKS

| Trademark | Registration Number | Registration Date | Class / Goods |
|-------------------------------------------------------------------------------------|----------------------------|--------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | 0,863,179 | January 7, 1969 | IC 010 025 026: COATS, TOPCOATS, JACKETS, SUITS, TROUSERS, SLACKS, SHORTS, OVERALLS, SKIRTS, CAPES, HATS, CAPS, BONNETS, HOODS, BERETS, NECKTIES, STOCKINGS, SOCKS, BELTS, BOOTS, SHOES, SLIPPERS, SANDALS, GLOVES, SHIRTS, COLLARS, PAJAMAS, DRESSING GOWNS, CARDIGANS, SWEATERS, PULLOVERS, SCARVES, BLOUSES, BEACH ROBES, DRESSES, SKIWEAR, HANDKERCHIEFS |
|  | 1,241,222 | June 7, 1983 | IC 025: Coats, Top Coats, Jackets, Trousers, Slacks, Waistcoats, Skirts, Capes, Hats, Shirts, Scarves, Shawls and Blouses. |
|  | 2,022,789 | September 24, 1996 | IC 018: suitcases, traveling bags, holdalls, suit and garment carriers for travel, attache cases, document cases, briefcases, purses, drawstring pouches, wallets, billfolds, passport holders, key cases, handbags, shoulder bags, credit card cases, business card cases, toilet bags sold empty, toilet cases sold empty, shaving bags sold empty, tie cases for travel, umbrellas and parasols. IC 024: traveling comforter, namely, fabric blanket-like articles for keeping warm, e.g., when traveling in cold climates, |

| Trademark | Registration Number | Registration Date | Class / Goods |
|-------------------------------------------------------------------------------------|---------------------|---------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | | <p>or for use as a stadium blanket.</p> <p>IC 025: clothing for men and women, namely, scarves, pullovers, cardigans, sweaters, overcoats, raincoats, shirts, belts; slippers for men.</p> |
|  | <p>2,732,617</p> | <p>July 1, 2003</p> | <p>IC 003: PERFUMES, EAU DE TOILETTES, EAU DE PARFUMS.</p> <p>IC 018: Articles of luggage, namely, suitcases, athletic and sport bags, beach bags, carry-on bags, clutch bags; duffel and gym bags; overnight bags; school book bags, shoulder bags, tote bags, garment bags for travel, carryall bags, traveling bags, hand bags, leather bags for computers and cameras; wallets and purses; toiletry bags sold empty and cosmetics bags sold empty; brief cases, satchels and portfolios; parasols, umbrellas, leather key holders.</p> <p>IC 025: Articles of outerclothing, namely, coats, overcoats, trench coats, casual coats, raincoats, jackets and blousons, poloshirts, blouses, dresses, pyjamas, knitwear namely, jumpers, sweaters, gilets, knitted shirts, knitted skirts and knitted scarves; and shorts, trousers, suits, skirts, underclothes, hosiery, headwear, footwear, sports clothing namely, sports trousers, sports shorts, sports shirts, sports jackets, sports footwear; tracksuits, garments that can be</p> |


| Trademark | Registration Number | Registration Date | Class / Goods |
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| | | | attached to or detached from coats, raincoats, trench coats, or casual coats for additional warmth; ties, belts, wraps, serapes, scarves, shawls and stoles, gloves. |
|  | 3,529,814 | November 11, 2008 | <p>IC 020: non-metal key fobs</p> <p>IC 024: blankets, throws, handkerchiefs, textile used as linings for clothing and accessories, fabrics for use in the manufacture of clothing, footwear, headwear, hosiery, belts, bags, cases, holders and key rings, umbrellas, watches, jewelry, towels, blankets, throws</p> <p>IC 025: Coats, detachable coat linings, rainwear, ponchos, jackets, gilets, jerseys, jumpers, sweaters, blouses, shirts, polo shirts, t-shirts, vests, dresses, skirts, trousers, jeans, shorts, ski wear, sports shirts, sports trousers, sweat shirts, waterproof clothing, namely, coats, jackets, and bikinis, sarongs, swimwear, bathrobes, boxer shorts, loungewear, nightwear, undergarments, ties, cravats, footwear, shoes, boots, athletic footwear, slippers, ballet slippers, socks, leggings, caps, hats, head scarves, belts, gloves, mufflers, scarves, shawls, stoles, pashminas, children's and infant's clothing, namely, coats, jackets, ponchos, jerseys, sweaters, blouses, shirts, t-shirts, singlets, vests, tank tops, waistcoats, suits, dresses, skirts, trousers, jeans, shorts, children's</p> |

| Trademark | Registration Number | Registration Date | Class / Goods |
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| | | | <p>headwear, children's swimwear, children's nightwear, children's under garments, and one-piece clothing, headwear, footwear; cloth bibs</p> <p>IC 028: Teddy bears</p> <p>IC 035: Retail store services in the fields of clothing, accessories, footwear, headgear, luggage, leather goods, timepieces, jewelry, eyewear and fragrances</p> |
| BURBERRY | 3,879,249 | November 23, 2010 | <p>IC 025: Articles of outer clothing, namely, coats, jackets, rainwear, ponchos, gilets, detachable coat linings, raincoats; blousons; casual coats; polo shirts; blouses; dresses; pyjamas; knitwear, namely, jerseys, jumpers, cardigans, sweaters, knitted leggings; shorts; trousers; suits; skirts; jackets; articles of underclothing, namely, boxer shorts, lingerie, loungewear, nightwear, underwear, undergarments; hosiery; headwear; footwear; sports clothing, namely, sweat pants, sweat shirts, swimwear; sports footwear; tracksuits; ready-made linings, namely, finished textile linings for garments; ties; clothing belts; wraps; scarves; shawls and stoles; gloves</p> |
| BURBERRY | 4,702,550 | March 17, 2015 | <p>IC 006: Metal key holders; metal key rings</p> <p>IC 016: Goods made of paper or cardboard, namely, paper labels, cardboard boxes, paper bags,</p> |

| Trademark | Registration Number | Registration Date | Class / Goods |
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| | | | <p>paper gift tags; posters, wrapping and packaging materials, namely, gift wrapping paper, gift bags; greeting cards</p> <p>IC 018: All-purpose carrying bags, valises, travelling bags, garment bags for travel, vanity cases sold empty, rucksacks, satchels, holdalls, handbags, shoulder bags, attaché-cases, briefcases, credit card holders, briefcase-type portfolios, athletic and sports bags, beach bags, carry-on bags, clutch bags, duffel and gym bags, overnight bags, school book bags, tote bags, reusable shopping bags; purses, leather pouches, wallets; pochettes; luggage label holders; cosmetic cases and bags sold empty; umbrellas</p> <p>IC 020: deck chairs and folding chairs</p> <p>IC 026: Buttons, snap fasteners, press studs, zip fasteners, decorative ribbons, buckles for clothing, belts and shoes; ornamental novelty badges; articles for hair, namely, hair ties, hair bands, hair ribbons, hair clips</p> <p>IC 028: stuffed toy animals including teddy bears</p> |
| BURBERRY | 4,714,346 | April 7, 2015 | IC 009: cases and holders for telephones, mobile telephones and mobile electronic devices, namely, PDAs (personal digital assistants), smart phones, personal entertainment devices, |

| Trademark | Registration Number | Registration Date | Class / Goods |
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| | | | namely, e-readers, personal navigation devices, tablet computers, netbooks, electronic notebooks, handheld computers and portable digital audio and/or video players |
| BURBERRY LONDON, ENGLAND | 5,116,946 | January 10, 2017 | <p>IC 003: Non-medicated toilet preparations, namely, perfumes, eau de cologne and toilet water</p> <p>IC 009: Sunglasses, spectacles, optical glasses, fitted frames and lenses for the aforesaid goods; cases and holders for the aforesaid goods; parts and fittings for all the aforesaid goods, namely, replacement parts therefor; cases and holders for portable computers and mobile telephones; bags for computers and cameras; mobile phone accessories, namely, mobile phone covers and skins, charms and lanyards</p> <p>IC 014: jewellery, imitation jewellery, tie-pins, tie clips and cuff links; articles made of precious metals or coated therewith, namely, jewellery boxes, hat and shoe ornaments, charms, badges, boxes and cases for tissues, jewellery, money, trinkets and watches, coasters, key rings and key holders</p> <p>IC 016: Writing paper, invitations, envelopes, gift tags; wrapping and packaging materials, namely, wrapping paper, gift wrap paper, gift bags, gift boxes; calendars, catalogues featuring clothing, handbags and</p> |

| Trademark | Registration Number | Registration Date | Class / Goods |
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| | | | <p>other luxury items; paper labels, clothing labels of paper, passport covers</p> <p>IC 018: Articles of luggage, namely, suitcases, trunks, valises, wheeled bags; bags, namely, holdalls, handbags, shoulder bags, tote bags, athletic and sport bags, backpacks, beach bags, bags for carrying babies' accessories, carry-on bags, clutch bags, duffel and gym bags, overnight bags, school book bags, garment bags for travel, carryall bags, traveling bags; wallets; purses; tie cases; leather boxes; toiletries and cosmetic bags sold empty, cases for manicure sets sold empty, briefcases, satchels and briefcase-type portfolios; parasols, umbrellas, pet coats, collars and leads; luggage labels and tags</p> <p>IC 020: cushions; clothes hangers</p> <p>IC 024: Blankets; throws; travel rugs; towels; cushion covers; handkerchiefs; clothing labels of textile; lining fabrics for textile use; fabrics for use in the manufacture of clothing; fabrics for use in the manufacture of bags, purses, wallets, luggage, toiletry and cosmetic cases, umbrellas, bed and table linen</p> <p>IC 025: Articles of outerclothing, namely, coats, overcoats, trench coats, casual</p> |

| Trademark | Registration Number | Registration Date | Class / Goods |
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| | | | <p>coats, raincoats, jackets and blousons, shirts, polo shirts, blouses, dresses, pyjamas, intimate apparel, namely, lingerie; sleepwear and loungewear; knitwear, namely, jumpers and sweaters, gilets, knitted shirts, knitted skirts and knitted scarves; shorts, trousers, suits, skirts, underclothes, hosiery, headwear, footwear, sports clothing, namely, sports trousers, sports shorts, sports shirts, and sports jackets; sports footwear; tracksuits, ready-made linings sold as component parts of coats, raincoats, trench coats and casual coats; ties, belts and wraps as clothing, serapes, scarves, shawls and stoles, gloves</p> <p>IC 028: stuffed toy animals including teddy bears, clothing for toys; Christmas tree decorations</p> |
|  | 6,513,734 | October 12, 2021 | <p>IC 003: non-medicated toilet preparations, namely, cosmetics; glitter for cosmetic purposes; non-medicated toilet preparations;, namely, cosmetics; glitter for cosmetic purposes; cosmetic preparations for the bath and shower; non-medicated body and skin care preparations, namely, creams, lotions, gels, toners, cleaners and peels; cosmetic preparations for the care of teeth and for hair; nail care preparations and nail polish, false nails; non-medicated soaps; anti-perspirants, deodorants for</p> |

| Trademark | Registration Number | Registration Date | Class / Goods |
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| | | | <p>personal use; perfumes, eau de cologne, eau de toilette, toilet water and aftershave; essential oils, massage oil; pot pourri, room fragrances and incense; cleaning preparations for leather goods and care preparations for leather goods, namely, conditioners, balms, creams, waxes and polish</p> <p>IC 009: sunglasses, spectacles, optical glasses, fitted frames and lenses for sunglasses, spectacles and optical glasses; cases and holders for sunglasses, spectacles and optical glasses; parts and fittings for sunglasses, spectacles and optical glasses, namely, frames; cases and holders for portable electronic devices, namely, mobile phones, tablets, electronic book readers, and digital book readers; mobile telephones, portable audio and video systems and computers; mouse mats; camera cases; portable electronic devices, electronic book readers, portable music readers and tablets; mobile phone accessories, namely, mobile phone covers and skins, lanyards for mobile phones, mobile phone fascias</p> <p>IC 014: watches, clocks and parts, fittings and cases for all the aforesaid goods; watch straps and bracelets therefor; jewellery, imitation jewellery, tie-pins, tie clips and cuff links; articles made of precious metals or coated therewith, namely key</p> |

| Trademark | Registration Number | Registration Date | Class / Goods |
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| | | | <p>rings, jewellery charms, badges, shoe jewellery; jewellery boxes and cases; models figures being ornaments and figures of precious metal; jewellery rolls; key holders and key rings of precious and semi-precious metals; key chains and charms therefor; jewellery rolls; cufflink cases</p> <p>IC 018: leather and imitation leather; bags, namely, holdalls, handbags, shoulder bags; trunks being luggage, valises, suitcases, travelling bags, garment bags for travel, bumbags, vanity cases sold empty, baby carrying bags, baby carriers worn on the body, baby harnesses, namely, harnesses for guiding children, rucksacks, satchels; canvas, textile, leather or mesh shopping bags, wheeled shopping bags and general purpose sport trolleys bags; purses, pouches made out of cloth; wallets, credit card holders, pochettes; labels of leather and luggage labels, leather baggage tags; cosmetic cases and bags sold empty, cases for manicure sets sold empty; tie cases; leather boxes; umbrellas, parasols; clothing for pets; horse blankets; collars and leashes for animals</p> <p>IC 024: textiles and textile items, namely, fabrics, namely, bed blankets; bed covers; bed linen; cot linen; duvets; mattress covers; pillowcases; quilts and eiderdowns; bed sheets; curtains;</p> |

| Trademark | Registration Number | Registration Date | Class / Goods |
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| | | | <p>towels; face cloths; table linen; plastic table covers; placemats of textile; unfitted fabric furniture covers, curtains, textile wall hangings, cushion covers; textile handkerchiefs; travelling rugs, picnic blankets; pet blankets; textile labels</p> <p>IC 025: clothing articles and outer clothing articles, namely, coats, jackets, rainwear, ponchos, gilets, detachable coat linings, raincoats, blousons; casual coats; polo shirts; blouses; t-shirts; dresses; pajamas; knitwear, namely, jerseys, jumpers, cardigans, sweaters, knitted leggings; shorts; trousers; suits for men women and children; skirts; jackets; jackets containing microprocessors; articles of underclothing, namely, boxer shorts, lingerie, loungewear, nightwear, underwear, undergarments, hosiery; sports clothing, namely, ski wear, sports jackets, sports jerseys, sports shirts, sports trousers, sweat pants, sweat shirts, sweat shorts, tracksuits, tennis wear, swimwear; sports footwear; tracksuits, ready-made linings, namely, finished textile linings for garments; ties; clothing belts; clothing wraps; serapes; scarves; shawls and stoles; gloves, footwear, headgear in the nature of headwear, belts, shirts, jeans</p> <p>IC 035: retail store and wholesale store services for</p> |

| Trademark | Registration Number | Registration Date | Class / Goods |
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| | | | clothing, footwear, headgear, bags, vanity cases sold empty, satchels, bumbags, purses, pouches, wallets, key holders, card holders, pochettes, labels and luggage labels, leather tags, leather belts, cosmetic cases and bags not fitted, cases for manicure sets sold empty, card cases, card holders, tie cases, cufflink cases, leather boxes, umbrellas, cases and holders for sunglasses and eyewear, cases and holders for portable electronic devices, cases and holders for mobile telephones, camera cases, phone covers and skins, charms and lanyards for mobile phones, mobile phone fascias, key rings and charms, diaries, notebooks, pen and pencil cases, pen holders, passport covers, paperweights, keyrings, homeware, perfumes, toiletries and cosmetics, watches, jewellery, eyewear and sunglasses |