AO 120 (Rev. 08/10)

TO:	Mail Stop 8 Director of the U.S. Patent and Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450	REPORT ON THE FILING OR DETERMINATION OF AN ACTION REGARDING A PATENT OR TRADEMARK

In Compliance with 35 U.S.C. § 290 and/or 15 U.S.C. § 1116 you are hereby advised that a court action has been filed in the U.S. District Court Southern District of Florida (Ft Lauderdale) on the following

☑ Trademarks or ☐ Patents. (☐ the patent action involves 35 U.S.C. § 292.):

DOCKET NO.	DATE FILED	U.S. DISTRICT COURT
16-cv-62717-PCH	11/17/2016	Southern District of Florida (Ft Lauderdale)

PLAINTIFF	DEFENDANT
Chanel, Inc.	Jhonshop.com et al

PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK
1 See Attachment		
2		
3		
4		
5		

In the above—entitled case, the following patent(s)/ trademark(s) have been included:

DATE INCLUDED	INCLUDED BY ☐ Amendment ☐ Answer ☐ Cross Bill ☐ Other Pleading	
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK
1		
2		
3		
4		
5		

In the above—entitled case, the following decision has been rendered or judgement issued:

DECISION/JUDGEMENT
See DE 39 Final Judgment and Permanent Injunction

CLERK	(BY) DEPUTY CLERK	DATE
Steven M. Larimore	Y.Rodriguez	1/24/2017

Copy 1—Upon initiation of action, mail this copy to Director **Copy 3—Upon termination of action, mail this copy to Director**
Copy 2—Upon filing document adding patent(s), mail this copy to Director **Copy 4—Case file copy**

26. As part of their overall infringement and counterfeiting scheme, Defendants are, upon information and belief, all employing substantially similar, and often times coordinated, paid advertising and SEO strategies based, in large measure, upon an illegal use of counterfeits and infringements of the Chanel Marks. Specifically, Defendants are using counterfeits of Chanel's famous name and the Chanel Marks in order to make their websites, social media accounts, and e-commerce stores selling illegal goods appear more relevant and attractive to search engines across an array of search terms and consumers online. By their actions, Defendants have created an illegal marketplace operating in parallel to the legitimate marketplace for Chanel's genuine goods. Defendants are causing concurrent and indivisible harm to Chanel and the consuming public by (i) depriving Chanel of its right to fairly compete for space within search engine results and reducing the visibility of Chanel's genuine goods on the World Wide Web, (ii) causing an overall degradation of the value of the goodwill associated with the Chanel Marks, and (iii) increasing Chanel's overall cost to market its goods and educate consumers about its brand via the Internet.

27. Upon information and belief, Defendants are concurrently conducting and targeting their counterfeiting and infringing activities toward consumers and causing harm within this district and elsewhere throughout the United States. As a result, Defendants are defrauding Chanel and the consuming public for Defendants' own benefit.

28. Upon information and belief, at all times relevant hereto, Defendants in this action have had full knowledge of Chanel's ownership of the Chanel Marks, including its exclusive right to use and license such intellectual property and the goodwill associated therewith.

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

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

31. Defendants' above identified infringing activities are likely to cause confusion, deception, and mistake in the minds of consumers, the public, and the trade before, during, and after the time of purchase. Moreover, Defendants' wrongful conduct is likely to create a false impression and deceive customers, the public, and the trade into believing there is a connection or association between Chanel's genuine goods and Defendants' Counterfeit Goods, which there is not.

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

33. Chanel has no adequate remedy at law.

34. Chanel is suffering irreparable and indivisible injury and has suffered substantial damages as a result of Defendants' unauthorized and wrongful use of the Chanel Marks. If Defendants' counterfeiting and infringing, and unfairly competitive activities are not preliminarily and permanently enjoined by this Court, Chanel and the consuming public will continue to be harmed.

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

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

36. Chanel hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 35 above.

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

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

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

40. Defendants' unlawful actions have individually and jointly caused and are continuing to cause unquantifiable damages to Chanel and are unjustly enriching Defendants at Chanel's expense.

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

42. Chanel has suffered and will continue to suffer irreparable injury and damages 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))

43. Chanel hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 35 above.

44. Upon information and belief, Defendants' Counterfeit Goods bearing, offered for sale, and sold using copies of the Chanel Marks have been widely advertised, offered for sale, and distributed throughout the United States.

45. Defendants' Counterfeit Goods bearing, offered for sale, and sold using copies of the Chanel Marks are virtually identical in appearance to Chanel's genuine goods. However, Defendants' Counterfeit Goods are different and likely inferior in quality. Accordingly, Defendants' activities are likely to cause confusion in the trade and among the general public as to at least the origin or sponsorship of their Counterfeit Goods.

46. Defendants, upon information and belief, 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 trade dress, which tend to falsely describe or represent such goods and have caused such goods to enter into commerce with full knowledge of the falsity of such designations of origin and such descriptions and representations, all to Chanel's detriment.

47. Defendants have authorized infringing uses of the Chanel Marks, in Defendants' advertisement and promotion of their counterfeit and infringing branded goods. Defendants have

misrepresented to members of the consuming public that the Counterfeit Goods being advertised and sold by them are genuine, non-infringing goods.

48. Additionally, Defendants are using counterfeits and infringements of the Chanel Marks in order to unfairly compete with Chanel and others for space within search engine organic results, thereby jointly depriving Chanel of a valuable marketing and educational tool which would otherwise be available to Chanel and reducing the visibility of Chanel's genuine goods on the World Wide Web.

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

50. Chanel has no adequate remedy at law, and has sustained indivisible injury and damage caused by Defendants' concurrent conduct. Absent an entry of an injunction by this Court, Chanel will continue to suffer irreparable injury to its goodwill and business reputation, as well as monetary damages.

COUNT III - COMMON LAW UNFAIR COMPETITION

51. Chanel hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 35 above.

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

53. Defendants are promoting and otherwise advertising, selling, offering for sale, and distributing goods bearing counterfeits and infringements of the Chanel Marks. Defendants are also using counterfeits and infringements of the Chanel Marks to unfairly compete with

Chanel and others for (1) space in search engine results across an array of search terms and (2) visibility on the World Wide Web.

54. 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 by their use of the Chanel Marks.

55. Chanel has no adequate remedy at law and is suffering irreparable injury and damage as a result of Defendants' actions.

COUNT IV - COMMON LAW TRADEMARK INFRINGEMENT

56. Chanel hereby adopts and re-alleges the allegations set forth in Paragraphs 1 through 35 above.

57. 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 the Chanel Marks. Chanel is the owner of all common law rights in and to the Chanel Marks.

58. Specifically, Defendants, upon information and belief, are promoting and otherwise advertising, distributing, offering for sale, and selling goods bearing infringements of the Chanel 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' Counterfeit Goods bearing the Chanel Marks.

60. Chanel has no adequate remedy at law and is suffering damages and irreparable injury as a result of Defendants' actions.

PRAYER FOR RELIEF

61. WHEREFORE, Chanel demands judgment on all Counts of this Complaint and an award of equitable relief and monetary relief, jointly and severally, against Defendants as follows:

a. Entry of temporary, preliminary, and permanent injunctions pursuant to 15 U.S.C. § 1116 and Federal Rule of Civil Procedure 65 enjoining Defendants, their agents, representatives, servants, employees, and all those acting in concert or participation therewith, from manufacturing or causing to be manufactured, importing, advertising or promoting, distributing, selling or offering to sell their Counterfeit Goods; from infringing, counterfeiting, or diluting the Chanel Marks; from using the Chanel Marks, or any mark or trade dress similar thereto, in connection with the sale of any unauthorized goods; from using any logo, trade name or trademark or trade dress 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 Chanel; from falsely representing themselves as being connected with Chanel, 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 Chanel; from using any reproduction, counterfeit, infringement, copy, or colorable imitation of the Chanel 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 Chanel, or in any way endorsed by Chanel and from offering such goods in commerce; from engaging in search engine optimization strategies using

colorable imitations of Chanel's name or trademarks; and from otherwise unfairly competing with Chanel.

b. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, that, upon Chanel's request, the top level domain (TLD) Registry for each of the Subject Domain Names or their administrators, including backend registry operators or administrators, place the Subject Domain Names 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.

c. Entry of an Order pursuant to 28 U.S.C. § 1651(a), The All Writs Act, canceling for the life of the current registration or, at Chanel's election, transferring the Subject Domain Names and any other domain names used by Defendants to engage in their counterfeiting of the Chanel Marks at issue to Chanel's control so they may no longer be used for illegal purposes, and requiring the Seller IDs, and any other alias seller identification names being used by Defendants to engage in the business of marketing, offering to sell and/or selling goods bearing counterfeits and infringements of the Chanel Marks be disabled by the applicable governing Internet marketplace and/or social media website.

d. Entry of an Order that, upon Chanel's request, any Internet marketplace and/or social media website operators and/or administrators who are provided with notice of the injunction, including but not limited to Artfire.com, Bonanza.com, Inc., eBay Inc., Etsy, Inc., iOffer, Inc., Shopify Inc., Facebook, Inc., and YouTube, LLC, cease facilitating access to any or all social media accounts and e-commerce stores through which Defendants engage in the promotion, offering for sale and/or sale of goods bearing counterfeits and/or infringements of the Chanel Marks.

e. Entry of an Order requiring Defendants to account to and pay Chanel for all profits and damages resulting from Defendants' trademark counterfeiting and infringing and unfairly competitive activities and that the award to Chanel be trebled, as provided for under 15 U.S.C. § 1117, or, at Chanel's election with respect to Count I, that Chanel 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 sold, as provided by 15 U.S.C. § 1117(c)(2) of the Lanham Act.

f. Entry of an award of Chanel's costs and reasonable attorneys' fees and investigative fees associated with bringing this action.

g. Entry of an Order that, upon Chanel's request, any financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to, PayPal, Inc., and its related companies and affiliates, identify and restrain all funds, up to and including the total amount of judgment, in all financial accounts and/or sub-accounts used in connection with the Subject Domain Names and Seller IDs, or other domain names, alias seller identification names, social media accounts, or 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), to be surrendered to Chanel in partial satisfaction of the monetary judgment entered herein.

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

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

DATED: November 17, 2016.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **s/Stephen M. Gaffigan**
Stephen M. Gaffigan (Fla. Bar No. 025844)
Virgilio Gigante (Fla. Bar No. 082635)
T. Raquel Rodriguez-Albizu (Fla. Bar. No. 103372)
401 East Las Olas Blvd., #130-453
Ft. Lauderdale, Florida 33301
Telephone: (954) 767-4819
Facsimile: (954) 767-4821
E-mail: stephen@smgpa.net
E-mail: leo@smgpa.net
E-mail: Raquel@smgpa.net

Attorneys for Plaintiff, CHANEL, INC.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.

CHANEL, INC.,

Plaintiff,

vs.

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

Defendants.
_____/

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

Plaintiff, Chanel, Inc. ("Plaintiff" or "Chanel"), hereby sues Defendants, the Individuals, Partnerships, and Unincorporated Associations identified on Schedule "A" hereto (collectively "Defendants"). Defendants are promoting, selling, offering for sale, and distributing goods bearing counterfeits and confusingly similar imitations of Chanel's trademarks within this district through various fully interactive, commercial Internet websites, Internet based social media accounts, and Internet based e-commerce stores operating under their domain names or seller identities set forth on Schedule "A" hereto (collectively, the "Subject Domain Names and Seller IDs"). In support of its claims, Chanel alleges as follows:

JURISDICTION AND VENUE

1. This is an action 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, 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. §

SCHEDULE "A"
DEFENDANTS BY NUMBER, SUBJECT DOMAIN NAME, AND SELLER ID

Defendant Number	Defendant / Subject Domain Name / Seller ID
1	Jhonshop.com
2	Nixocase.com
3	artheta.com
4	customsbay.com
5	d-allstore.com
6	designerqualitybag.com
7	dozepalace.com
8	geboymujair.com
9	origidstore.com
10	teesbuy.net
11	topcasedirect.com
12	royalclothing.cn
12	RoyalClothingltd
13	Sharpaccessory
14	AbiEbay
15	agusshop
16	AngelHandmade1529
17	Best_Cases
18	BoyBandCutet_Shirt
19	ccshopone
20	Eizzy
21	henitseue
22	hurapopho
23	Juuangkriiiiik
24	KingCases
25	kudakempleng_baby
26	Munzashop
27	qalbipangestu96
28	RockmanStore
29	selamet2
30	TaufiqShop

31	1.hk720
32	aritz1967
33	avaba_store
34	jennyliushi
35	lunalux
36	min.clothes
37	princess_channel
38	marie*chanel
39	ukmilana
40	fashionstreetwear
41	Liratya
42	phishekshop
43	gaohua
44	mador
45	heartmarkcases
46	Luxe_n_Luxury Bagsxtra2

SCHEDULE "B"
PLAINTIFF'S FEDERALLY REGISTERED TRADEMARKS

Trademark	Registration Number	Registration Date	Class(es)/Goods
CHANEL	0,902,190	November 10, 1970	IC 014 – Bracelets, Pins, and Earrings
	1,241,264	June 7, 1983	IC 025 – Suits, jackets, skirts, dresses, pants, blouses, tunics, sweaters, cardigans, tee-shirts, coats, raincoats, scarves, shoes and boots
	1,314,511	January 15, 1985	IC 018 – Leather Goods-Namely, Handbags
	1,347,094	July 9, 1985	IC 003 – Perfumery, Cosmetics and Toiletries
CHANEL	1,347,677	July 9, 1985	IC 018 - Leather Goods-namely, Handbags
	1,501,898	August 30, 1988	IC 006 – Keychains IC 014 – Costume Jewelry IC 016 – Gift Wrapping Paper IC 025 – Blouses, Shoes, Belts, Scarves, Jackets, Men's Ties IC 026 – Brooches and Buttons for Clothing
CHANEL	1,733,051	November 17, 1992	IC 018 - Leather Goods; namely, Handbags, Wallets, Travel Bags, Luggage, Business and Credit Card Cases, Change Purses, Tote Bags, Cosmetic Bags Sold Empty, and Garment Bags for Travel
CHANEL	3,890,159	December 14, 2010	IC 009 – Cases for telephones IC 016 – Temporary tattoos IC 018 – Key cases

Trademark	Registration Number	Registration Date	Class(es)/Goods
	4,074,269	December 20, 2011	IC 009 – Protective covers for portable electronic devices, handheld digital devices, personal computers and cell phones IC 016 – Temporary tattoos IC 018 – Key cases
	4,241,822	November 13, 2012	IC 025 – Clothing; namely, coats, jackets, dresses, tops, blouses, sweaters, cardigans, skirts, vests, pants, jeans, belts, swim wear, pareos, beach cover-ups, hats, sun visors, scarves, shawls, ties, gloves, footwear, hosiery and socks

Composite Exhibit 1

United States Patent Office

902,190
Registered Nov. 10, 1970

PRINCIPAL REGISTER
Trademark

Ser. No. 339,492, filed May 28, 1969

CHANEL

Chanel, Inc. (New York corporation)
1 W. 57th St.
New York, N.Y. 10019

For: BRACELETS, PINS, AND EARRINGS, in CLASS 28 (INT. CL. 14).
First use in 1914; in commerce in or before 1925.
Owner of Reg. No. 612,169.

TESS was last updated on Wed Aug 24 03:21:02 EDT 2016

Typed Drawing

Word Mark	**CHANEL**
Goods and Services	IC 014. US 028. G & S: BRACELETS, PINS, AND EARRINGS. FIRST USE: 19140000. FIRST USE IN COMMERCE: 19250000
Mark Drawing Code	(1) TYPED DRAWING
Serial Number	72339492
Filing Date	May 28, 1969
Current Basis	1A
Original Filing Basis	1A
Registration Number	0902190
Registration Date	November 10, 1970
Owner	(REGISTRANT) **CHANEL**, INC. CORPORATION NEW YORK **Chanel** Legal Department 9 W. 57TH ST. NEW YORK NEW YORK 10019
Prior Registrations	**0612169**
Type of Mark	TRADEMARK
Register	PRINCIPAL
Affidavit Text	SECT 15. SECTION 8(10-YR) 20100412.
Renewal	3RD RENEWAL 20100412
Live/Dead Indicator	LIVE

USPTO TSDR Case Viewer

Download PDF

Case Id	Document Description	Mail/ Create Date
72339492		pr. 12, 2010

Prev Doc 1 of 1 Next Doc

Side - 1

NOTICE OF ACCEPTANCE OF §8 DECLARATION AND §9 RENEWAL
MAILING DATE: Apr 12, 2010

The declaration and renewal application filed in connection with the registration identified below meets the requirements of Sections 8 and 9 of the Trademark Act, 15 U.S.C. §§1058 and 1059. The declaration is accepted and renewal is granted. The registration remains in force.

For further information about this notice, visit our website at: http://www.uspto.gov. To review information regarding the referenced registration, go to http://tarr.uspto.gov.

REG NUMBER: **0902190**
MARK: **CHANEL**
OWNER: **CHANEL, INC.**

Side - 2

UNITED STATES PATENT AND TRADEMARK OFFICE
COMMISSIONER FOR TRADEMARKS
P.O. BOX 1451
ALEXANDRIA, VA 22313-1451

FIRST-CLASS MAIL
U.S POSTAGE
PAID

VERONICA L HRDY
CHANEL, INC
9 W 57TH ST
NEW YORK, NY 10019

uspto UNITED STATES PATENT AND TRADEMARK OFFICE

About Us | Careers | Contact Us

Patents | Trademarks | Learning and Resources

USPTO > Trademark > TSDR > Trademark Search

TSDR FAQ'S

1. The Post Registration "Maintenance Tab" has been temporarily disabled. It will return soon.

2. TSDR now displays information regarding TM5 Common Status Descriptors.

Trademark Status & Document Retrieval (TSDR)

SEARCH | MULTI-SEARCH

US_APPLICATION | 73544055 | Status | Documents

Status results found

STATUS | DOCUMENTS | Download | Print Preview

Generated on:	This page was generated by TSDR on 2016-09-13 17:16:08 EDT		
Mark:	CHANEL		No Image exists for this case.
US Serial Number:	72339492	Application Filing Date:	May 28, 1969
US Registration Number:	902190	Registration Date:	Nov. 10, 1970
Register:	Principal		
Mark Type:	Trademark		
TM5 Common Status Descriptor:	LIVE/REGISTRATION/Issued and Active The trademark application has been registered with the Office.		
Status:	The registration has been renewed.		
Status Date:	Apr. 12, 2010		

Expand All

- Mark Information
- Related Properties Information
- Goods and Services
- Basis Information (Case Level)
- Current Owner(s) Information
- Attorney/Correspondence Information
- Prosecution History
- Maintenance Filings or Post Registration Information
- TM Staff and Location Information
- Assignment Abstract Of Title Information - Click to Load
- Proceedings - Click to Load

Download Adobe Reader

If you are the applicant or the applicant's attorney and have questions about this file, please contact the Trademark Assistance Center

uspto UNITED STATES PATENT AND TRADEMARK OFFICE

BROWSE BY TOPIC: Patents, Trademarks, Learning & Resources

ABOUT THIS SITE: Accessibility, Privacy Policy, Terms of Use

USPTO BACKGROUND: Federal Activity, Inventory Reform Act (FAIR), USPTO Budget and

FEDERAL GOVERNMENT: Regulations.gov, Stopfakes.gov, USA.gov

7412409

THE UNITED STATES OF AMERICA

TO ALL TO WHOM THESE PRESENTS SHALL COME:

UNITED STATES DEPARTMENT OF COMMERCE
United States Patent and Trademark Office

April 16, 2013

THE ATTACHED U.S. TRADEMARK REGISTRATION *1,241,264* IS CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF *20* YEARS FROM *June 07, 1983*
2nd RENEWAL FOR A TERM OF *10* YEARS FROM *June 07, 2013*
SECTION 8 & 15
LESS GOODS
SAID RECORDS SHOW TITLE TO BE IN:
REGISTRANT

By Authority of the
Under Secretary of Commerce for Intellectual Property
and Director of the United States Patent and Trademark Office

T. Lawrence

T. LAWRENCE
Certifying Officer

1121 and 28 U.S.C. §§ 1331 and 1338. This Court has supplemental jurisdiction pursuant to 28 U.S.C. § 1367 over Chanel'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 fully interactive, commercial Internet websites, Internet based social media accounts, and Internet based e-commerce stores accessible in Florida and operating under the Subject Domain Names and Seller IDs.

3. Venue is proper in this Court pursuant to 28 U.S.C. § 1391 since Defendants are, upon information and belief, aliens who are engaged in infringing activities and causing harm within this district. Defendants have also advertised, offered for sale, and made sales and shipped and/or sold infringing products to consumers in Florida.

THE PLAINTIFF

4. Chanel is a corporation organized under the laws of the State of New York with its principal place of business in the United States located at Nine West 57th Street, New York, New York 10019. Chanel operates boutiques throughout the world, including within this district. Chanel is, in part, engaged in the business of manufacturing and distributing throughout the world, including within this district, a variety of high quality luxury goods under multiple world famous common law and federally registered trademarks, as discussed in Paragraph 14 below, and identified in Schedule "B" hereto. Chanel offers for sale and sells its trademarked goods within this district. Defendants' offers to sell and sales of counterfeit and infringing Chanel branded products are causing damage to Chanel within this jurisdiction. Defendants, through the sale and offering for sale of counterfeit and infringing Chanel branded products, are directly, and

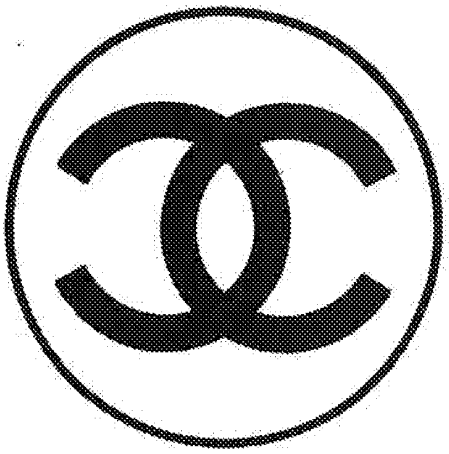
Int. Cl.: 25

Prior U.S. Cl.: 39

Reg. No. 1,241,264

United States Patent and Trademark Office **Registered Jun. 7, 1983**

TRADEMARK
Principal Register



Chanel, Inc. (New York corporation)
9 W. 57th St.
New York, N.Y. 10019

For: SUITS, JACKETS, SKIRTS, DRESSES, PANTS, BLOUSES, TUNICS, SWEATERS, CARDIGANS, TEE-SHIRTS, ~~CAPES~~, COATS, RAINCOATS, ~~JACKETS MADE OF FEATHERS, SHAWLS~~, SCARVES, SHOES AND BOOTS, in CLASS 25 (U.S. Cl. 39).

First use Dec. 21, 1976; in commerce Dec. 21, 1976.

Owner of U.S. Reg. Nos. 239,992 and 1,084,877.

Ser. No. 359,660, filed Apr. 14, 1982.

CRAIG K. MORRIS, Examiner

THE UNITED STATES OF AMERICA

TO ALL TO WHOM THESE PRESENTS SHALL COME:

UNITED STATES DEPARTMENT OF COMMERCE

United States Patent and Trademark Office

May 23, 2008

THE ATTACHED U.S. TRADEMARK REGISTRATION *1,314,511* IS CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF *20* YEARS FROM *January 15, 1985*
1st RENEWAL FOR A TERM OF *10* YEARS FROM *January 15, 2005*
SECTION 8 & 15
LESS GOODS
CLASS(ES) CANCELLED:
INT CL 016

SAID RECORDS SHOW TITLE TO BE IN:
Registrant

By Authority of the
Under Secretary of Commerce for Intellectual Property
and Director of the United States Patent and Trademark Office

P. SWAIN
Certifying Officer

Int. Cls.: 16 and 18

Prior U.S. Cls.: 3 and 37

Reg. No. 1,314,511

United States Patent and Trademark Office

Registered Jan. 15, 1985

TRADEMARK
Principal Register

Chanel, Inc. (New York corporation)
9 W. 57th St.
New York, N.Y. 10019

For: NOTEBOOKS AND STATIONERY-TYPE PORTFOLIOS, in CLASS 16 (U.S. Cl. 37).

First use Sep. 1981; in commerce Sep. 1981.

For: LEATHER GOODS—NAMELY, HANDBAGS, WALLETS, TRAVEL BAGS, LUGGAGE, CREDIT CARD AND BUSINESS CARD CASES, MAKE-UP BAGS AND VANITY CASES SOLD EMPTY, BRIEFCASE-TYPE PORTFOLIOS, ATTACHE CASES, CHANGE PURSES, SUIT-CASES, TOTE BAGS, GARMENT BAGS AND TRAVELLERS' SHOE BAGS, in CLASS 18 (U.S. Cl. 3).

First use Nov. 24, 1954; in commerce Nov. 24, 1954.

Owner of U.S. Reg. No. 1,075,016.

Ser. No. 356,733, filed Mar. 26, 1982.

FRANCIE R. GOROWITZ, Examining Attorney

TESS was last updated on Tue May 17 03:21:31 EDT 2016

Record 1 out of 1

Word Mark	CC
Goods and Services	(CANCELLED) IC 016. US 037. G & S: [Notebooks and Stationery-Type Portfolios]. FIRST USE: 19810900. FIR USE IN COMMERCE: 19810900
	IC 018. US 003. G & S: Leather Goods-Namely, Handbags, [Wallets, Travel Bags, Luggage, Credit Card and Business Card Cases, Make-Up Bags and Vanity Cases Sold Empty, Briefcase-Type Portfolios; Attache Cases, Change Purses, Suitcases, Tote Bags, Garment Bags and Travellers' Shoe Bags]. FIRST USE: 19541124. FIRST USE IN COMMERCE: 19541124
Mark Drawing Code	(5) WORDS, LETTERS, AND/OR NUMBERS IN STYLIZED FORM
Serial Number	73356733
Filing Date	March 26, 1982
Current Basis	1A
Original Filing Basis	1A
Published for Opposition	November 6, 1984
Change In Registration	CHANGE IN REGISTRATION HAS OCCURRED
Registration Number	**1314511**
Registration Date	January 15, 1985
Owner	(REGISTRANT) Chanel, Inc. Chanel Legal Department CORPORATION NEW YORK 9 West 57th Street, 44th Flo New York NEW YORK 10019
Attorney of	

Record	VERONICA L. HRDY
Prior Registrations	1075016
Type of Mark	TRADEMARK
Register	PRINCIPAL
Affidavit Text	SECT 15. PARTIAL SECT 8 (6-YR). SECTION 8(10-YR) 20150126.
Renewal	2ND RENEWAL 20150126
Live/Dead Indicator	LIVE

TESS HOME | NEW USER | STRUCTURED | FREE FORM | BROWSE DICT | SEARCH OG | TOP | HELP

| HOME | SITE INDEX| SEARCH | eBUSINESS | HELP | PRIVACY POLICY

Side - 1

NOTICE OF ACCEPTANCE OF §8
DECLARATION AND §9 RENEWAL
MAILING DATE: Jan 26, 2015

The declaration and renewal application filed in connection with the registration identified below meets the requirements of Sections 8 and 9 of the Trademark Act, 15 U.S.C. §§1058 and 1059. The declaration is accepted and renewal is granted. The registration remains in force.

For further information about this notice, visit our website at: http://www.uspto.gov. To review information regarding the referenced registration, go to http://tarr.uspto.gov.

REG NUMBER:	**1314511**
MARK:	**CC(STYLIZED/DESIGN)**
OWNER:	**Chanel, Inc.**

Side - 2

UNITED STATES PATENT AND TRADEMARK OFFICE
COMMISSIONER FOR TRADEMARKS
P.O. BOX 1451
ALEXANDRIA, VA 22313-1451

FIRST-CLASS MAIL
U.S POSTAGE
PAID

Chanel, Inc.
9 West 57th Street, 44th Floor
Chanel Legal Department
NEW YORK, NY 10019

Some users are unable to retrieve data from TSDR using the Internet Explorer browser. The USPTO is working to resolve the system problem. As a workaround, please open TSDR in a different browser, such as Google Chrome, Safari, or Mozilla Firefox. For additional assistance, email TSDR@uspto.gov.

STATUS | DOCUMENTS | Back to Search | Print

Generated on: This page was generated by TSDR on 2016-05-17 11:19:26 EDT

Mark: CC

US Serial Number:	73356733	**Application Filing Date:**	Mar. 26, 1982
US Registration Number:	1314511	**Registration Date:**	Jan. 15, 1985
Register:	Principal		
Mark Type:	Trademark		
Status:	The registration has been renewed.		
Status Date:	Jan. 26, 2015		
TM5 Common Status Descriptor:	LIVE/REGISTRATION/Issued and Active The trademark application has been registered with the Office.		
Publication Date:	Nov. 06, 1984		

Expand All

- Mark Information
- Related Properties Information
- Goods and Services
- Basis Information (Case Level)
- Current Owner(s) Information
- Attorney/Correspondence Information
- Prosecution History
- Maintenance Filings or Post Registration Information
- TM Staff and Location Information
- Assignment Abstract Of Title Information - Click to Load
- Proceedings - Click to Load

Int. Cl.: 3

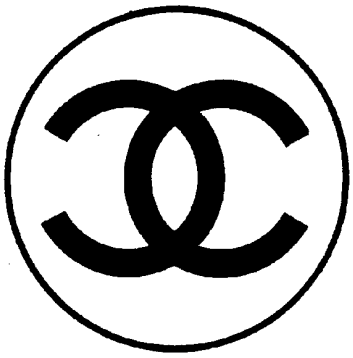
Prior U.S. Cl.: 51

Reg. No. 1,347,094

United States Patent and Trademark Office

Registered July 9, 1985

TRADEMARK
PRINCIPAL REGISTER



CHANEL, INC. (NEW YORK CORPORATION)
9 WEST 57TH STREET
NEW YORK, NY 10019

FOR: A FULL LINE OF PERFUMERY, COSMETICS, AND TOILETRIES, IN CLASS 3 (U.S. CL. 51).

FIRST USE 1-1-1920; IN COMMERCE 1-1-1920.

OWNER OF U.S. REG. NOS. 195,359, 399,751, AND 799,642.

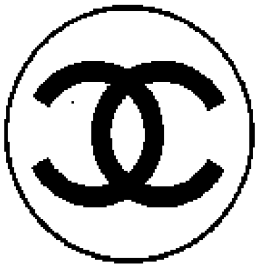
THE MARK CONSISTS OF A STYLIZED DESIGN OF THE LETTERS "CC".

SER. NO. 494,775, FILED 8-13-1984.

LYNNE G. BERESFORD, EXAMINING ATTORNEY

TESS was last updated on Thu Nov 17 03:31:43 EST 2016

Record 1 out of 1



Word Mark	CC
Goods and Services	IC 003. US 051. G & S: A FULL LINE OF PERFUMERY, COSMETICS, AND TOILETRIES. FIRST USE: 19200101. FIRST USE IN COMMERCE: 19200101
Mark Drawing Code	(3) DESIGN PLUS WORDS, LETTERS, AND/OR NUMBERS
Design Search Code	26.01.01 - Circles as carriers or as single line borders
Serial Number	73494775
Filing Date	August 13, 1984
Current Basis	1A
Original Filing Basis	1A
Published for Opposition	April 30, 1985
Registration Number	**1347094**
Registration Date	July 9, 1985
Owner	(REGISTRANT) CHANEL, INC. CORPORATION NEW YORK Chanel Legal Department 9 West 57th Street, Floor NEW YORK NEW YORK 10019
Prior Registrations	0195359;0399751;0799642
Description of Mark	THE MARK CONSISTS OF A STYLIZED DESIGN OF THE LETTERS "CC".
Type of Mark	TRADEMARK
Register	PRINCIPAL
Affidavit Text	SECT 15. SECT 8 (6-YR). SECTION 8(10-YR) 20150625.
Renewal	2ND RENEWAL 20150625
Live/Dead	LIVE

USPTO TSDR Case Viewer

Download PDF

Case Id	Document Description	Mail/ Create Date
73494775		Jun. 25, 2015

Prev Doc 1 of 1 Next Doc

Side - 1

NOTICE OF ACCEPTANCE OF §8 DECLARATION AND §9 RENEWAL
MAILING DATE: Jun 25, 2015

The declaration and renewal application filed in connection with the registration identified below meets the requirements of Sections 8 and 9 of the Trademark Act, 15 U.S.C. §§1058 and 1059. The declaration is accepted and renewal is granted. The registration remains in force.

For further information about this notice, visit our website at: http://www.uspto.gov. To review information regarding the referenced registration, go to http://tarr.uspto.gov.

REG NUMBER: **1347094**
MARK: **CC(STYLIZED/DESIGN)**
OWNER: **CHANEL, INC.**

Side - 2

UNITED STATES PATENT AND TRADEMARK OFFICE
COMMISSIONER FOR TRADEMARKS
P.O. BOX 1451
ALEXANDRIA, VA 22313-1451

FIRST-CLASS MAIL
U.S POSTAGE
PAID

CHANEL, INC.
9 WEST 57TH STREET, 44TH FLOOR
CHANEL LEGAL DEPARTMENT
NEW YORK, NY 10019

unfairly, competing with Chanel's economic interests in the State of Florida and causing Chanel harm within this jurisdiction. Chanel regularly enforces its intellectual property rights and authorized this action be brought in its name.

5. Like many other famous trademark owners in the luxury goods market, Chanel suffers ongoing daily and sustained violations of its trademark rights at the hands of counterfeiters and infringers, such as Defendants herein, who wrongfully reproduce and counterfeit Chanel's trademarks for the twin purposes of (i) duping and confusing the consuming public and (ii) earning substantial profits. The natural and intended byproduct of Defendants' actions is the erosion and destruction of the goodwill associated with the Chanel name and associated trademarks and the destruction of the legitimate market sector in which it operates.

6. In order to combat the indivisible harm caused by the combined actions of Defendants and others engaging in similar conduct, each year Chanel expends significant monetary resources in connection with trademark enforcement efforts, including legal fees, investigative fees, and support mechanisms for law enforcement, such as field training guides and seminars. The recent explosion of counterfeiting over the Internet has created an environment that requires Chanel to file a massive number of lawsuits, often it later turns out, against the same individuals and groups, in order to protect both consumers and itself from the ill effects of confusion and the erosion of the goodwill associated with the Chanel brand.

THE DEFENDANTS

7. Defendants are individuals and/or business entities of unknown makeup that operate either domain names registered with registrars in multiple countries or social media accounts or e-commerce stores via third-party marketplace or social media websites, such as Artfire.com, Bonanza.com, eBay.com, eBay.au, eBay.co.uk, Etsy.com, iOffer.com, shopify.com,

uspto UNITED STATES PATENT AND TRADEMARK OFFICE
About Us Careers Contact Us
Patents Trademarks Learning and Resources
USPTO > Trademark > TSDR > Trademark Search
TSDR FAQ'S

The Trademark organization is beta testing a next generation examination system. As a result, there may be instances where Office actions have unexpected formatting or spacing issues. The Office is working on improvements to resolve these issues and appreciates your patience. Please contact us at TMFeedback if you have comments or issues with the appearance of a particular Office action or its attachments.

Trademark Status & Document Retrieval (TSDR)

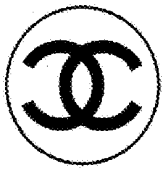
SEARCH MULTI-SEARCH

US_APPLICATION 73494482 Status Documents

Status results found

STATUS DOCUMENTS Download Print Preview

Generated on:	This page was generated by TSDR on 2016-11-17 11:46:21 EST
Mark:	CC



US Serial Number:	73494775	Application Filing Date:	Aug. 13, 1984
US Registration Number:	1347094	Registration Date:	Jul. 09, 1985
Register:	Principal		
Mark Type:	Trademark		
TM5 Common Status Descriptor:	LIVE/REGISTRATION/Issued and Active The trademark application has been registered with the Office.		
Status:	The registration has been renewed.		
Status Date:	Jun. 25, 2015		
Publication Date:	Apr. 30, 1985		

Expand All

- Mark Information
- Related Properties Information
- Goods and Services
- Basis Information (Case Level)
- Current Owner(s) Information
- Attorney/Correspondence Information
- Prosecution History
- Maintenance Filings or Post Registration Information
- TM Staff and Location Information
- Assignment Abstract Of Title Information - Click to Load
- Proceedings - Click to Load

Download Adobe Reader

If you are the applicant or the applicant's attorney and have questions about this file, please contact the Trademark Assistance Center

uspto UNITED STATES PATENT AND TRADEMARK OFFICE
BROWSE BY TOPIC ABOUT THIS SITE USPTO BACKGROUND FEDERAL GOVERNMENT

THE UNITED STATES OF AMERICA

TO ALL TO WHOM THESE PRESENTS SHALL COME:

UNITED STATES DEPARTMENT OF COMMERCE
United States Patent and Trademark Office

May 23, 2008

THE ATTACHED U.S. TRADEMARK REGISTRATION *1,347,677* IS CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF *20* YEARS FROM *July 09, 1985*
1st RENEWAL FOR A TERM OF *10* YEARS FROM *July 09, 2005*
SECTION 8 PARTIAL & 15
LESS GOODS
CLASS(ES) CANCELLED:
INT. CL 016

SAID RECORDS SHOW TITLE TO BE IN:
REGISTRANT

By Authority of the
Under Secretary of Commerce for Intellectual Property
and Director of the United States Patent and Trademark Office

L. Edelen

L. EDELEN
Certifying Officer

Int. Cls.: 16 and 18

Prior U.S. Cls.: 3 and 37

United States Patent and Trademark Office

Reg. No. 1,347,677
Registered July 9, 1985

TRADEMARK
PRINCIPAL REGISTER

CHANEL

CHANEL, INC. (NEW YORK CORPORATION)
9 W. 57TH ST.
NEW YORK, NY 10019

FOR: ~~NOTEBOOKS AND STATIONERY TYPE PORTFOLIOS,~~ IN CLASS 16 (U.S. CL. 37).
FIRST USE 9-0-1981; IN COMMERCE 9-0-1981.
FOR: LEATHER GOODS—NAMELY, HANDBAGS, ~~WALLETS, TRAVEL BAGS, LUGGAGE, BUSINESS AND CREDIT CARD CASES, BRIEF CASE TYPE PORTFOLIOS, ATTACHE CASES, CHANGE PURSES, SUITCASES, TOTE BAGS, MAKE-UP BAGS AND VANITY CASES SOLD EMPTY, GARMENT BAGS FOR TRAVEL AND TRAVELLERS' SHOE BAGS,~~ IN CLASS 18 (U.S. CL. 3).
FIRST USE 0-0-1938; IN COMMERCE 11-24-1954.
OWNER OF U.S. REG. NO. 626,035.

SER. NO. 356,734, FILED 3-26-1982.

ROBERT PEVERADA, EXAMINING ATTORNEY

TESS was last updated on Tue May 17 03:21:31 EDT 2016

Record 1 out of 1

Typed Drawing

Word Mark	CHANEL
Goods and Services	(CANCELLED) IC 016. US 037. G & S: [Notebooks and Stationery Type Portfolios]. FIRST USE: 19810900. FIR USE IN COMMERCE: 19810900
	IC 018. US 003. G & S: Leather Goods-Namely, Handbags [, Wallets, Travel Bags, Luggage, Business and Cred Card Cases, Brief Case Type Portfolios, Attache Cases, Change Purses, Suitcases, Tote Bags, Make-Up Bags ar Vanity Cases Sold Empty, Garment Bags for Travel and Travellers' Shoe Bags]. FIRST USE: 19380000. FIRST U IN COMMERCE: 19541124
Mark Drawing Code	(1) TYPED DRAWING
Serial Number	73356734
Filing Date	March 26, 1982
Current Basis	1A
Original Filing Basis	1A
Published for Opposition	April 30, 1985
Change In Registration	CHANGE IN REGISTRATION HAS OCCURRED
Registration Number	**1347677**
Registration Date	July 9, 1985
Owner	(REGISTRANT) Chanel, Inc. CORPORATION NEW YORK Chanel Legal Department 9 West 57th Street, 44th Flo New York NEW YORK 10019
Prior Registrations	0626035
Type of Mark	TRADEMARK
Register	PRINCIPAL
Affidavit Text	SECT 15. PARTIAL SECT 8 (6-YR). SECTION 8(10-YR) 20150625.
Renewal	2ND RENEWAL 20150625

Live/Dead Indicator LIVE

Side - 1

NOTICE OF ACCEPTANCE OF §8
DECLARATION AND §9 RENEWAL
MAILING DATE: Jun 25, 2015

The declaration and renewal application filed in connection with the registration identified below meets the requirements of Sections 8 and 9 of the Trademark Act, 15 U.S.C. §§1058 and 1059. The declaration is accepted and renewal is granted. The registration remains in force.

For further information about this notice, visit our website at: http://www.uspto.gov. To review information regarding the referenced registration, go to http://tarr.uspto.gov.

REG NUMBER:	**1347677**
MARK:	**CHANEL**
OWNER:	**Chanel, Inc.**

Side - 2

UNITED STATES PATENT AND TRADEMARK OFFICE
COMMISSIONER FOR TRADEMARKS
P.O. BOX 1451
ALEXANDRIA, VA 22313-1451

FIRST-CLASS MAIL
U.S POSTAGE
PAID

Chanel, Inc.
9 West 57th Street, 44th Floor
Chanel Legal Department
NEW YORK, NY 10019

Some users are unable to retrieve data from TSDR using the Internet Explorer browser. The USPTO is working to resolve the system problem. As a workaround, please open TSDR in a different browser, such as Google Chrome, Safari, or Mozilla Firefox. For additional assistance, email TSDR@uspto.gov.

STATUS | DOCUMENTS | Back to Search | Print

Generated on:	This page was generated by TSDR on 2016-05-17 11:52:33 EDT
Mark:	CHANEL

No Image exists for this c

US Serial Number:	73356734	**Application Filing Date:**	Mar. 26, 1982
US Registration Number:	1347677	**Registration Date:**	Jul. 09, 1985
Register:	Principal		
Mark Type:	Trademark		
Status:	The registration has been renewed.		
Status Date:	Jun. 25, 2015		
TM5 Common Status Descriptor:	LIVE/REGISTRATION/Issued and Active The trademark application has been registered with the Office.		
Publication Date:	Apr. 30, 1985		

Expand All

- Mark Information
- Related Properties Information
- Goods and Services
- Basis Information (Case Level)
- Current Owner(s) Information
- Attorney/Correspondence Information
- Prosecution History
- Maintenance Filings or Post Registration Information
- TM Staff and Location Information
- Assignment Abstract Of Title Information - Click to Load
- Proceedings - Click to Load

Int. Cls.: 6, 14, 16, 25 and 26

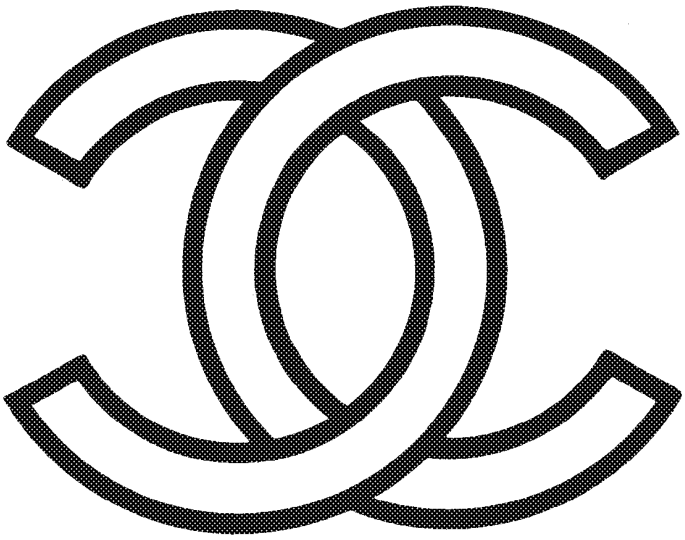
Prior U.S. Cls.: 13, 28, 37, 39 and 40

Reg. No. 1,501,898

United States Patent and Trademark Office

Registered Aug. 30, 1988

TRADEMARK
PRINCIPAL REGISTER



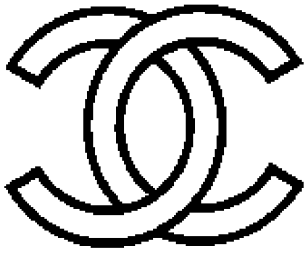
CHANEL, INC. (NEW YORK CORPORATION)
9 WEST 57TH STREET
NEW YORK, NY 10019

FOR: KEYCHAINS, IN CLASS 6 (U.S. CL. 13).
FIRST USE 9-0-1981; IN COMMERCE 9-0-1981.
FOR: COSTUME JEWELRY, IN CLASS 14 (U.S. CL. 28).
FIRST USE 9-0-1981; IN COMMERCE 9-0-1981.
FOR: GIFT WRAPPING PAPER , IN CLASS 16 (U.S. CL. 37).
FIRST USE 8-0-1986; IN COMMERCE 8-0-1986.
FOR: BLOUSES, SHOES, BELTS, SCARVES, JACKETS, MEN'S TIES, IN CLASS 25 (U.S. CL. 39).
FIRST USE 9-0-1981; IN COMMERCE 9-0-1981.
FOR: BROOCHES, BUTTONS FOR CLOTHING, IN CLASS 26 (U.S. CL. 40).
FIRST USE 9-0-1981; IN COMMERCE 9-0-1981.
OWNER OF U.S. REG. NOS. 195,359, 1,347,094 AND OTHERS.

SER. NO. 644,065, FILED 2-9-1987.

JANE MCCABE, EXAMINING ATTORNEY

TESS was last updated on Wed Aug 24 07:31:09 EDT 2016



Word Mark	CC
Goods and Services	IC 006. US 013. G & S: KEYCHAINS. FIRST USE: 19810900. FIRST USE IN COMMERCE: 19810900 IC 014. US 028. G & S: COSTUME JEWELRY. FIRST USE: 19810900. FIRST USE IN COMMERCE: 19810900 IC 016. US 037. G & S: GIFT WRAPPING PAPER. FIRST USE: 19860800. FIRST USE IN COMMERCE: 19860800 IC 025. US 039. G & S: BLOUSES, SHOES, BELTS, SCARVES, JACKETS, MEN'S TIES. FIRST USE: 19810900. FIRST USE IN COMMERCE: 19810900 IC 026. US 040. G & S: BROOCHES, BUTTONS FOR CLOTHING. FIRST USE: 19810900. FIRST USE IN COMMERCE: 19810900
Mark Drawing Code	(5) WORDS, LETTERS, AND/OR NUMBERS IN STYLIZED FORM
Serial Number	73644065
Filing Date	February 9, 1987
Current Basis	1A
Original Filing Basis	1A
Published for Opposition	June 7, 1988
Registration Number	1501898
Registration Date	August 30, 1988
Owner	(REGISTRANT) **CHANEL**, INC. CORPORATION NEW YORK **Chanel** Legal Department 9 WEST 57TH STREET NEW YORK NEW YORK 10019
Attorney of	

Record	VERONICA L. HRDY
Prior Registrations	0195359;0399751;0799642;1241264;1271876;1293398;1308092;1314511;1347094; AND OTHERS
Type of Mark	TRADEMARK
Register	PRINCIPAL
Affidavit Text	SECT 15. SECT 8 (6-YR). SECTION 8(10-YR) 20080714.
Renewal	1ST RENEWAL 20080714
Live/Dead Indicator	LIVE

TESS HOME | NEW USER | STRUCTURED | FREE FORM | BROWSE DICT | SEARCH OG | TOP | HELP | PREV LIST | CURR LIST | NEXT LIST | FIRST DOC | PREV DOC | NEXT DOC | LAST DOC

| HOME | SITE INDEX | SEARCH | eBUSINESS | HELP | PRIVACY POLICY

Facebook.com, and YouTube.com, and each of whom, upon information and belief, either reside and/or operate in foreign jurisdictions, including the People's Republic of China, 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 towards consumers throughout the United States, including within this district, and conduct pervasive business through the operation of, at least, the fully interactive, commercial Internet websites, Internet based social media accounts, and Internet based e-commerce stores via the domain names and third-party Internet marketplace and/or social media websites existing under the Subject Domain Names and Seller IDs.

8. Defendants are the past and present controlling forces behind the sale of counterfeit and infringing products bearing Chanel's trademarks as described herein operating and using at least the Subject Domain Names and Seller IDs.

9. Upon information and belief, Defendants directly engage in unfair competition with Chanel by advertising, offering for sale, and selling goods bearing counterfeits and infringements of one or more of Chanel's trademarks to consumers within the United States and this district through multiple fully interactive, commercial Internet websites, Internet based social media accounts, and Internet based e-commerce stores operating under, at least, the Subject Domain Names and Seller IDs. Defendants, upon information and belief, also operate additional domains, social media accounts, and e-commerce stores which promote and offer for sale counterfeit and infringing goods under domain names and/or seller identification aliases not yet known to Chanel. Defendants have purposefully directed some portion of their illegal activities towards consumers in the State of Florida through the advertisement, offer to sell, sale, and/or shipment of counterfeit Chanel-branded goods into the State.

UNITED STATES PATENT AND TRADEMARK OFFICE

Commissioner for Trademarks
P.O. Box 1451
Alexandria, VA 22313-1451
www.uspto.gov

REGISTRATION NO: 1501898 SERIAL NO: 73/644065 MAILING DATE: 07/14/2008
REGISTRATION DATE: 08/30/1988
MARK: CC
REGISTRATION OWNER: CHANEL, INC.

CORRESPONDENCE ADDRESS:

VERONICA L HRDY
CHANEL, INC
9 W 57TH ST
Chanel Legal Department
NEW YORK, NY 10019-2790

NOTICE OF ACCEPTANCE

15 U.S.C. Sec. 1058(a)(3)

THE COMBINED AFFIDAVIT AND RENEWAL APPLICATION FILED FOR THE ABOVE-IDENTIFIED REGISTRATION MEETS THE REQUIREMENTS OF SECTION 8 OF THE TRADEMARK ACT, 15 U.S.C. Sec. 1058.

ACCORDINGLY, THE SECTION 8 AFFIDAVIT IS ACCEPTED.

****

NOTICE OF RENEWAL

15 U.S.C. Sec. 1059(a)

THE COMBINED AFFIDAVIT AND RENEWAL APPLICATION FILED FOR THE ABOVE-IDENTIFIED REGISTRATION MEETS THE REQUIREMENTS OF SECTION 9 OF THE TRADEMARK ACT, 15 U.S.C. Sec. 1059.

ACCORDINGLY, THE REGISTRATION IS RENEWED.

****

THE REGISTRATION WILL REMAIN IN FORCE FOR CLASS(ES):
016, 026, 025, 014, 006.

LEE, HAROLD D
PARALEGAL SPECIALIST

POST-REGISTRATION DIVISION
571-272-9500

PLEASE SEE THE REVERSE SIDE OF THIS NOTICE FOR INFORMATION CONCERNING REQUIREMENTS FOR MAINTAINING THIS REGISTRATION

ORIGINAL

uspto UNITED STATES PATENT AND TRADEMARK OFFICE
About Us Careers Contact Us
Patents Trademarks Learning and Resources
USPTO > Trademark > TSDR > Trademark Search
TSDR FAQ'S

1. The Post Registration "Maintenance Tab" has been temporarily disabled. It will return soon.
2. TSDR now displays information regarding TMS Common Status Descriptors.

Trademark Status & Document Retrieval (TSDR)

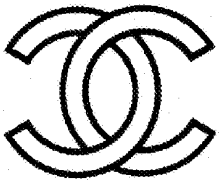
SEARCH MULTI-SEARCH

US_APPLICATION 73639482 Status Documents

Status results found

STATUS DOCUMENTS Download Print Preview

Generated on:	This page was generated by TSDR on 2016-09-13 17:25:32 EDT
Mark:	CC



US Serial Number:	73644065	Application Filing Date:	Feb. 09, 1987
US Registration Number:	1501838	Registration Date:	Aug. 30, 1988
Register:	Principal		
Mark Type:	Trademark		
TMS Common Status Descriptor:	LIVE/REGISTRATION/Issued and Active The trademark application has been registered with the Office.		
Status:	The registration has been renewed.		
Status Date:	Jul. 14, 2008		
Publication Date:	Jun. 07, 1988		

Expand All

- Mark Information
- Related Properties Information
- Goods and Services
- Basis Information (Case Level)
- Current Owner(s) Information
- Attorney/Correspondence Information
- Prosecution History
- Maintenance Filings or Post Registration Information
- TM Staff and Location Information
- Assignment Abstract Of Title Information - Click to Load
- Proceedings - Click to Load

Download Adobe Reader

If you are the applicant or the applicant's attorney and have questions about this file, please contact the Trademark Assistance Center

uspto UNITED STATES PATENT AND TRADEMARK OFFICE
BROWSE BY TOPIC ABOUT THIS SITE USPTO BACKGROUND FEDERAL GOVERNMENT
Patents Accessibility Recent Activity Privacy Policy

Int. Cl.: 18

Prior U.S. Cl.: 3

Reg. No. 1,733,051

United States Patent and Trademark Office Registered Nov. 17, 1992

TRADEMARK
PRINCIPAL REGISTER

CHANEL

CHANEL, INC. (NEW YORK CORPORATION)
9 WEST 57TH STREET
NEW YORK, NY 10019

FOR: LEATHER GOODS; NAMELY, HANDBAGS, WALLETS, TRAVEL BAGS, LUGGAGE, BUSINESS AND CREDIT CARD CASES, CHANGE PURSES, TOTE BAGS, COSMETIC BAGS SOLD EMPTY, AND GARMENT BAGS FOR TRAVEL, IN CLASS 18 (U.S. CL. 3).

FIRST USE 0-0-1954; IN COMMERCE 0-0-1954.

OWNER OF U.S. REG. NOS. 626,035, 1,347,677 AND OTHERS.

SER. NO. 74-242,426, FILED 1-31-1992.

KEITH L. HENDERSON, EXAMINING ATTORNEY

TESS was last updated on Wed Nov 9 03:31:02 EST 2016

Record 1 out of 1

Typed Drawing

Word Mark	CHANEL
Goods and Services	IC 018. US 003. G & S: leather goods; namely, handbags, wallets, travel bags, luggage, business and credit card cases, change purses, tote bags, cosmetic bags sold empty, and garment bags for travel. FIRST USE: 19540000. FIRST USE IN COMMERCE: 19540000
Mark Drawing Code	(1) TYPED DRAWING
Serial Number	74242426
Filing Date	January 31, 1992
Current Basis	1A
Original Filing Basis	1A
Published for Opposition	August 25, 1992
Registration Number	**1733051**
Registration Date	November 17, 1992
Owner	(REGISTRANT) Chanel, Inc. CORPORATION NEW YORK Chanel Legal Department 9 West 57th Street New Yor NEW YORK 100192790
Prior Registrations	0626035;1347677;AND OTHERS
Type of Mark	TRADEMARK
Register	PRINCIPAL
Affidavit Text	SECT 15. SECT 8 (6-YR). SECTION 8(10-YR) 20121113.
Renewal	2ND RENEWAL 20121113
Live/Dead Indicator	LIVE

USPTO TSDR Case Viewer

Download PDF

Case Id	Document Description	Mail/ Create Date
74242426		v. 13, 2012

Prev Doc 1 of 1 Next Doc

Side - 1

NOTICE OF ACCEPTANCE OF §8 DECLARATION AND §9 RENEWAL
MAILING DATE: Nov 13, 2012

The declaration and renewal application filed in connection with the registration identified below meets the requirements of Sections 8 and 9 of the Trademark Act, 15 U.S.C. §§1058 and 1059. The declaration is accepted and renewal is granted. The registration remains in force.

For further information about this notice, visit our website at: http://www.uspto.gov. To review information regarding the referenced registration, go to http://tarr.uspto.gov.

REG NUMBER: **1733051**
MARK: **CHANEL**
OWNER: **Chanel, Inc.**

Side - 2

UNITED STATES PATENT AND TRADEMARK OFFICE
COMMISSIONER FOR TRADEMARKS
P.O. BOX 1451
ALEXANDRIA, VA 22313-1451

FIRST-CLASS MAIL
U.S POSTAGE
PAID

CHANEL, INC.
9 WEST 57TH STREET
CHANEL LEGAL DEPARTMENT
NEW YORK, NY 10019-2790

uspto UNITED STATES PATENT AND TRADEMARK OFFICE
About Us Careers Contact Us
Patents Trademarks Learning and Resources
USPTO > Trademark > TSDR > Trademark Search
TSDR FAQ'S

The Trademark organization is beta testing a next generation examination system. As a result, there may be instances where Office actions have unexpected formatting or spacing issues. The Office is working on improvements to resolve these issues and appreciates your patience. Please contact us at TMFeedback if you have comments or issues with the appearance of a particular Office action or its attachments.

Trademark Status & Document Retrieval (TSDR)

SEARCH MULTI-SEARCH

US_APPLICATION 72339482 Status Documents

Status results found

STATUS DOCUMENTS Download Print Preview

Generated on:	This page was generated by TSDR on 2016-11-09 14:00:00 EST
Mark:	CHANEL

No image exists for this case.

US Serial Number:	74242426	Application Filing Date:	Jan. 31, 1992
US Registration Number:	1733051	Registration Date:	Nov. 17, 1992
Register:	Principal		
Mark Type:	Trademark		
TM5 Common Status Descriptor:	LIVE/REGISTRATION/Issued and Active The trademark application has been registered with the Office.		
Status:	The registration has been renewed.		
Status Date:	Nov. 13, 2012		
Publication Date:	Aug. 25, 1992		

- Mark Information
- Related Properties Information
- Goods and Services
- Basis Information (Case Level)
- Current Owner(s) Information
- Attorney/Correspondence Information
- Prosecution History
- Maintenance Filings or Post Registration Information
- TM Staff and Location Information
- Assignment Abstract Of Title Information - Click to Load
- Proceedings - Click to Load

Expand All

Download Adobe Reader

If you are the applicant or the applicant's attorney and have questions about this file, please contact the Trademark Assistance Center

uspto UNITED STATES PATENT AND TRADEMARK OFFICE
BROWSE BY TOPIC ABOUT THIS SITE USPTO BACKGROUND FEDERAL GOVERNMENT
Patents Accessibility Legal Notices Resources.gov

United States of America

United States Patent and Trademark Office

CHANEL

Reg. No. 3,890,159

Registered Dec. 14, 2010

Int. Cls.: 9, 16 and 18

TRADEMARK

PRINCIPAL REGISTER

CHANEL, INC. (NEW YORK CORPORATION)
CHANEL LEGAL DEPARTMENT
9 WEST 57TH STREET
NEW YORK, NY 10019

FOR: CASES FOR TELEPHONES, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 4-1-2010; IN COMMERCE 4-1-2010.

FOR: TEMPORARY TATTOOS, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29, 37, 38 AND 50).

FIRST USE 2-17-2010; IN COMMERCE 2-17-2010.

FOR: KEY CASES, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FIRST USE 4-1-2010; IN COMMERCE 4-1-2010.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

OWNER OF U.S. REG. NOS. 195,360, 3,134,695 AND OTHERS.

SER. NO. 85-026,466, FILED 4-29-2010.

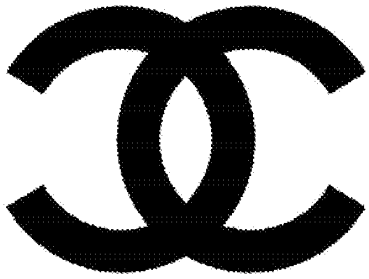
TRICIA SONNEBORN, EXAMINING ATTORNEY

David J. Kappos

Director of the United States Patent and Trademark Office

United States of America

United States Patent and Trademark Office



Reg. No. 4,074,269

Registered Dec. 20, 2011

Int. Cls.: 9, 16 and 18

TRADEMARK

PRINCIPAL REGISTER

CHANEL, INC. (NEW YORK CORPORATION)
CHANEL LEGAL DEPARTMENT
9 WEST 57TH STREET
NEW YORK, NY 10019

FOR: PROTECTIVE COVERS FOR PORTABLE ELECTRONIC DEVICES, HANDHELD DIGITAL DEVICES, PERSONAL COMPUTERS AND CELL PHONES, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 4-1-2010; IN COMMERCE 4-1-2010.

FOR: TEMPORARY TATTOOS, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29, 37, 38 AND 50).

FIRST USE 4-1-2010; IN COMMERCE 4-1-2010.

FOR: KEY CASES, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FIRST USE 4-1-2010; IN COMMERCE 4-1-2010.

OWNER OF U.S. REG. NOS. 1,501,898, 3,025,936 AND OTHERS.

THE MARK CONSISTS OF BACK-TO-BACK INTERLOCKING CS.

SER. NO. 85-341,276, FILED 6-8-2011.

DANNEAN HETZEL, EXAMINING ATTORNEY

David J. Kappos

Director of the United States Patent and Trademark Office

REQUIREMENTS TO MAINTAIN YOUR FEDERAL TRADEMARK REGISTRATION

WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.

Requirements in the First Ten Years*
What and When to File:

First Filing Deadline: You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. *See* 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.

Second Filing Deadline: You must file a Declaration of Use (or Excusable Nonuse) **and** an Application for Renewal between the 9th and 10th years after the registration date.* *See* 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*
What and When to File:

You must file a Declaration of Use (or Excusable Nonuse) **and** an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

The United States Patent and Trademark Office (USPTO) will NOT send you any future notice or reminder of these filing requirements.

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the USPTO. The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. *See* 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. *See* 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see http://www.wipo.int/madrid/en/.

NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at http://www.uspto.gov.

10. Defendants have registered, established or purchased, and maintained the Subject Domain Names and Seller IDs, and the websites, social media accounts, and e-commerce stores operating thereunder. Upon information and belief, Defendants have engaged in fraudulent conduct with respect to the registration of the Subject Domain Names and Seller IDs by providing false and/or misleading information to their various registrars or to the third-party marketplace and/or social media websites where they offer for sale and/or sell, during the registration or maintenance process. Upon information and belief, many Defendants have anonymously registered and maintained some of the Subject Domain Names and Seller IDs for the sole purpose of engaging in illegal counterfeiting activities.

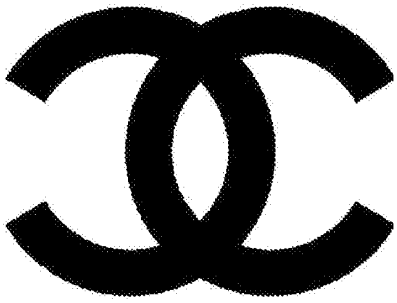
11. Upon information and belief, Defendants will continue to register or acquire new domain names and seller identification aliases for the purpose of selling and offering for sale goods bearing counterfeit and confusingly similar imitations of Chanel's trademarks unless preliminarily and permanently enjoined.

12. Defendants' entire Internet-based businesses amount to nothing more than illegal operations established and operated in order to infringe the intellectual property rights of Chanel and others.

13. Defendants' business names, i.e., the Subject Domain Names and Seller IDs, and any other alias domain names and seller identification names used in connection with the sale of counterfeit and infringing goods bearing Chanel's trademarks, are essential components of Defendants' online activities and are one of the means by which Defendants further their counterfeiting and infringing scheme and cause harm to Chanel. Moreover, Defendants are using Chanel's famous name and trademarks to drive Internet consumer traffic to their websites, social media accounts, and e-commerce stores operating under the Subject Domain Names and Seller

United States of America

United States Patent and Trademark Office



Reg. No. 4,241,822

Registered Nov. 13, 2012

Int. Cl.: 25

TRADEMARK

PRINCIPAL REGISTER

CHANEL, INC. (NEW YORK CORPORATION)
CHANEL LEGAL DEPARTMENT
9 WEST 57TH STREET
NEW YORK, NY 10019

FOR: CLOTHING, NAMELY, COATS, JACKETS, DRESSES, TOPS, BLOUSES, SWEATERS, CARDIGANS, SKIRTS, VESTS, PANTS, JEANS, BELTS, SWIM WEAR, PAREOS, BEACH COVER-UPS, HATS, SUN VISORS, SCARVES, SHAWLS, TIES, GLOVES, FOOTWEAR, HOSIERY AND SOCKS, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 10-1-1984; IN COMMERCE 10-1-1984.

OWNER OF U.S. REG. NOS. 1,293,398, 4,074,269 AND OTHERS.

THE MARK CONSISTS OF BACK-TO-BACK INTERLOCKING CS.

SER. NO. 85-587,416, FILED 4-3-2012.

ROBERT STRUCK, EXAMINING ATTORNEY

David J. Kappos

Director of the United States Patent and Trademark Office

REQUIREMENTS TO MAINTAIN YOUR FEDERAL TRADEMARK REGISTRATION

WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.

Requirements in the First Ten Years*
What and When to File:

First Filing Deadline: You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. *See* 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.

Second Filing Deadline: You must file a Declaration of Use (or Excusable Nonuse) **and** an Application for Renewal between the 9th and 10th years after the registration date.* *See* 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*
What and When to File:

You must file a Declaration of Use (or Excusable Nonuse) **and** an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

The United States Patent and Trademark Office (USPTO) will NOT send you any future notice or reminder of these filing requirements.

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the USPTO. The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. *See* 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. *See* 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see http://www.wipo.int/madrid/en/.

NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at http://www.uspto.gov.

IDs, thereby increasing the value of the Subject Domain Names and Seller IDs and decreasing the size and value of Chanel's legitimate common marketplace at Chanel's expense.

COMMON FACTUAL ALLEGATIONS

Plaintiff's Business and Trademark Rights

14. Chanel is, and at all times relevant hereto has been, the owner of all rights in and to the trademarks identified on Schedule "B" hereto (collectively, the "Chanel Marks"), which are valid and registered on the Principal Register of the United States Patent and Trademark Office. The Chanel Marks are used in connection with the manufacture and distribution of high quality goods in the categories also identified on "Schedule B." True and correct copies of the Certificates of Registration for the Chanel Marks are attached hereto as Composite Exhibit "1."

15. The Chanel Marks have been used in interstate commerce to identify and distinguish Chanel's high quality goods for an extended period of time.

16. The Chanel Marks are symbols of Chanel's quality, reputation, and goodwill and have never been abandoned.

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

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

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

20. Accordingly, the Chanel Marks have achieved secondary meaning as identifiers of high quality luxury goods.

21. Chanel has carefully monitored and policed the use of the Chanel Marks and has never assigned or licensed the Chanel Marks to any of the Defendants in this matter.

22. Genuine Chanel branded goods bearing the Chanel Marks are widely legitimately advertised and promoted by Chanel, its authorized distributors, and unrelated third parties via the Internet. Over the course of the past ten years, visibility on the Internet, particularly via Internet search engines such as Google, Yahoo!, and Bing has become increasingly important to Chanel's overall marketing and consumer education efforts. Thus, Chanel expends significant monetary resources on Internet marketing and consumer education, including search engine optimization ("SEO") strategies. Those strategies allow Chanel and its authorized retailers to fairly and legitimately educate consumers about the value associated with the Chanel brand and the goods sold thereunder.

Defendants' Infringing Activities

23. Upon information and belief, Defendants are promoting and advertising, distributing, selling, and/or offering for sale goods, including without limitation, handbags, wallets, tee-shirts, tops, brooches, shoes, cosmetics, cases for telephones, protective covers for portable electronic devices, including cell phones, keychains, and costume jewelry, including necklaces, bracelets, and earrings, in interstate commerce bearing counterfeit and infringing trademarks that are exact copies of the Chanel Marks (the "Counterfeit Goods") through at least,

the fully interactive, commercial Internet websites, Internet based social media accounts, and Internet based e-commerce stores operating under the Subject Domain Names and Seller IDs. Specifically, upon information and belief, Defendants are using identical copies of the Chanel Marks for different quality goods. Chanel has used the Chanel Marks extensively and continuously before Defendants began offering counterfeit and confusingly similar imitations of Chanel's merchandise.

24. Upon information and belief, Defendants' Counterfeit Goods are of a quality substantially and materially different than that of Chanel's genuine goods. Defendants, upon information and belief, are actively using, promoting and otherwise advertising, distributing, selling, and/or offering for sale substantial quantities of their Counterfeit Goods with the knowledge and intent that such goods will be mistaken for the genuine high quality goods offered for sale by Chanel despite Defendants' knowledge that they are without authority to use the Chanel Marks. The net effect of Defendants' actions will cause confusion of consumers who will believe Defendants' Counterfeit Goods are genuine goods originating from, associated with, and approved by Chanel.

25. Defendants advertise their Counterfeit Goods for sale to the consuming public via websites operating under at least the Subject Domain Names and via social media accounts and e-commerce stores on Internet marketplace and/or social media websites, using at least the Seller IDs. In so advertising these goods, Defendants improperly and unlawfully use the Chanel Marks without Chanel's permission. Indeed, Defendants herein misappropriated Chanel's advertising ideas and methods of doing business with regard to the advertisement and sale of Chanel's genuine goods. Upon information and belief, the misappropriation of Chanel's advertising ideas in the form of the Chanel Marks is the proximate cause of damage to Chanel.