

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

CASE NO.:

XYZ Corporation

Plaintiff,


v.

ABC Corporation 1 and ABC Corporation 2,
Chinese Entities

Defendants.

_____ /

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

XYZ Corporation ("Plaintiff"), hereby files its Complaint for trademark infringement against Defendants, ABC Corporation 1 and ABC Corporation 2, pseudonyms for Defendants  (collectively, "Defendants"), and in support of its claims states as follows:

I. JURISDICTION AND VENUE

1. This is an action for damages and injunctive relief for federal trademark infringement and false designation of origin under the Lanham Act pursuant to 15 U.S.C. §§ 1114, 1116, 1121, 1125(a), and 1125(d), and The All Writs Act, 28 U.S.C. § 1651(a); 15 U.S.C. § 1051, et seq., Florida common law unfair competition, and Florida common law infringement.

2. This Court has original subject matter jurisdiction under 28 U.S.C. § 1331, 28 U.S.C. § 1338(a)-(b), and 15 U.S.C. § 1121. This Court has supplemental jurisdiction pursuant to 28 U.S.C. § 1367(a) over Plaintiff's state law claims because those claims are so related to the federal claims that they form part of the same case or controversy.

3. This Court may exercise personal jurisdiction over Defendants because each of the Defendants directly targets business activities towards consumers throughout the United States, including Florida, through at least the fully interactive e-commerce stores operating under the seller [REDACTED]. Specifically, Defendants have targeted sales to Florida by operating these e-commerce stores that target Florida consumers, offering to ship to Florida, accepting payment in U.S. dollars, and have sold products using Plaintiff's federally registered trademark.

4. At a minimum, the common law violations under Florida Law are a basis for long-arm jurisdiction over the Defendants, under Florida Statutes §§ 48.193(1)(a), and 48.193(1)(b), because Defendants have both committed torts within Florida through infringement and unfair competition under Florida Common Law.

5. Venue is proper in this district under 28 U.S.C. § 1391 because Defendants are subject to this Court's personal jurisdiction, not residents of the United States, and upon information and belief, are engaged in infringing activities and causing harm within this district by advertising, offering to sell, selling and/or shipping infringing products to consumers in this district.

6. Each Defendant is properly subject to jurisdiction in the United States because each is a foreign entity with sufficient contacts here, as they systematically offer counterfeit items through [REDACTED]. This systematic offering of counterfeit items for sale makes it reasonably foreseeable that each Defendant would be called to answer in a court within the United States, ensuring that the exercise of jurisdiction in this Court aligns with due process.

7. Hence, the Court has jurisdiction over each Defendant under Federal Rule of Civil Procedure 4(k).

II. PARTIES

Plaintiff

8. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] (“Plaintiff’s Mark”) is attached hereto as **Exhibit 1**.

9. Plaintiff offers for sale through its online retail store women's fashion and apparel products branded with the [REDACTED] trademark ("Plaintiff's Goods"). Plaintiff has continuously offered Plaintiff's Goods under Plaintiff's Mark since at least as early as 2013. As a result of its continuous use, Plaintiff has also acquired common law trademark rights in Plaintiff's Mark.

10. Plaintiff's extensive and continuous use of Plaintiff's Mark in connection with Plaintiff's Goods has indelibly impressed on the minds of the relevant consuming public that Plaintiff's Mark identifies Plaintiff as the source of Plaintiff's Goods.

11. Plaintiff has expended substantial time, money, and effort to advertise and promote Plaintiff's Goods under the Plaintiff's Mark. Plaintiff has built substantial goodwill in and to Plaintiff's Mark. Plaintiff's Mark is a valuable asset of Plaintiff.

Defendants

12. Defendant ABC Corporation 1, is a business entity of unknown corporate organization and/or structure who owns and/or operates one or more of the e-commerce stores on the [REDACTED]. Defendant operates at least the seller store [REDACTED] with the [REDACTED] [REDACTED] under the business name [REDACTED]

[REDACTED]

[REDACTED]. On information and belief,

Defendant resides and/or operates in the People's Republic of China or other related foreign jurisdictions, who redistribute products from the same or similar sources in those locations, and/or ship their goods from the same or similar sources to consumers.

13. Defendant ABC Corporation 2, is a business entity of unknown corporate organization and/or structure who owns and/or operates one or more of the e-commerce stores on the [REDACTED]

[REDACTED] On information and belief, Defendant resides and/or operates in the People's Republic of China or other related foreign jurisdictions, who redistribute products from the same or similar sources in those locations, and/or ship their goods from the same or similar sources to consumers.

14. On information and belief, Defendants have provided false or inaccurate business names and addresses when registering for their e-commerce stores. Defendant ABC Corporation

[REDACTED] This makes it virtually impossible for Plaintiff to discover Defendants' true identities and the interworking of their infringement network scheme.

III. BACKGROUND INFORMATION

15. Defendants are each advertising, promoting, offering for sale and/or selling goods infringing products using Plaintiff's Mark in the description of goods ("Defendants' Goods") on

their e-commerce stores on the [REDACTED]. Screenshots of Defendants' product webpages are attached hereto as **Exhibit 2**.

16. Defendants are using Plaintiff's Mark to initially attract online consumers and drive them to Defendants' e-commerce stores operating under the Seller Aliases. Defendants' use of the wordmark [REDACTED] is identical in sight, spelling, sound, meaning, and commercial impression to Plaintiff's Mark.

17. Defendants' Goods are of a quality substantially lower than that of Plaintiff's genuine goods. Defendants are actively using, promoting and otherwise advertising, distributing, offering for sale and/or selling substantial quantities of their infringing goods with the knowledge and intent that such goods will be mistaken for the genuine, high-quality goods offered for sale by Plaintiff despite Defendants' knowledge that they are without authority to use Plaintiff's Mark. Defendants' actions are likely to confuse consumers at the time of initial interest, sale, and in the post-sale setting, who will believe Defendants' Goods are genuine goods originating from, associated with, and/or approved by Plaintiff.

18. Plaintiff has identified e-commerce stores offering infringing goods under the [REDACTED] mark on online marketplace platforms. Most third-party online marketplace platforms do not subject new sellers to verification or confirm their identities, which allows infringers to use fake or inaccurate names, business information, and addresses when creating their e-commerce stores on these platforms.¹ Third-party online marketplace platforms also generally do not require

¹ U.S. Department of Homeland Security, Report on Combating Trafficking in Counterfeit and Pirated Goods, January 24, 2020, (available at: https://www.dhs.gov/sites/default/files/publications/20_0124_plcy_counterfeit-pirated-goods-report_01.pdf).

a seller to identify any underlying business entity, thus infringers can create multiple profiles and e-commerce stores that appear unrelated, even though they are commonly owned and operated.²

19. Defendants facilitate sales by establishing e-commerce stores under Seller Aliases, allowing them to appear as authorized online retailers to unsuspecting customers. These seller alias registration patterns are among the many tactics employed by e-commerce operators, like the Defendants, to hide their identities and the comprehensive scope and operation of their infringement activities, as well as to evade being shut down. E-commerce stores using Seller Aliases seem legitimate because they operate on reputable and trusted online marketplace platforms and accept payments in U.S. dollars and/or funds from U.S. bank accounts via [REDACTED]

20. E-commerce stores operating under the Seller Aliases share several notable standard features, including similar registration patterns, keywords, and advertising tactics, as well as commonalities in pricing and quantities, frequent grammar errors and misspellings, and/or the reuse of identical text and images.

21. In this case, both infringers use the internet address of the Plaintiff in their descriptions, which consist of a string of nonsensical keywords containing the Plaintiff's internet address, which is intended to drive internet traffic away from the Plaintiff. The Plaintiff has not licensed or authorized the Defendants to use the Plaintiff's Mark, and neither of the Defendants is an authorized retailer of the Plaintiff's Goods.

22. Through their actions, Defendants are harming Plaintiff and the consuming public by (i) denying Plaintiff the right to fairly compete for online space and within search engine results, which diminishes the visibility of Plaintiff's genuine goods on the Internet, (ii) causing a general

² *Id.* at 39.

decline in the value of the goodwill associated with Plaintiff's Mark, and (iii) increasing the overall cost for Plaintiff to market its goods and educate consumers about its brand online.

23. Defendants' payment and financial accounts associated with the [REDACTED] [REDACTED] are utilized by Defendants to accept, receive, and deposit profits from their trademark-infringing and unfairly competitive activities linked to their Seller Aliases.

24. Further, Defendants are, upon information and belief, likely to transfer or secret their assets to avoid payment of any monetary judgment awarded to Plaintiff. Therefore, Plaintiff has no adequate remedy at law.

25. Plaintiff is enduring irreparable harm and has incurred substantial damages due to Defendants' unauthorized and wrongful use of Plaintiff's Mark. If this Court does not preliminarily and permanently enjoin Defendants' infringing and unfairly competitive activities, Omega and the consuming public will continue to be harmed while Defendants unjustly reap substantial profits.

CLAIMS

COUNT I

TRADEMARK INFRINGEMENT PURSUANT TO 15 U.S.C. § 1114

26. Plaintiff realleges and incorporates by reference the allegations set forth above in paragraphs 1-24.

27. This is an action for trademark infringement against Defendants based on their unauthorized use of Plaintiff's Mark in commerce in connection with the promotion, advertisement, distribution, offering for sale, and/or sale of Defendants' Products.

28. Plaintiff is the exclusive owner of Plaintiff's Mark. The United States Registration for Plaintiff's Mark is in full force and effect.

29. On information and belief, Defendants have knowledge of Plaintiff's rights in Plaintiff's Mark and are willfully and intentionally infringing on Plaintiff's trademark rights by

using Plaintiff's Mark in connection with Defendants' description, advertising, promotion, and sale of Defendants' Goods.

30. Defendants' activities constitute willful trademark infringement under Section 32 of the Lanham Act, 15 U.S.C. § 1114.

31. Defendants' willful, intentional, and unauthorized use of Plaintiff's Mark for goods identical, nearly identical, directly competing, and/or overlapping to Plaintiff's Goods is likely to cause and is causing confusion, mistake, confusion, and deception as to the quality, origin, sponsorship, or approval of Defendants' Products among the general public.

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

33. Plaintiff has no adequate remedy at law. Plaintiff has suffered and will continue to suffer irreparable injury and damages because of Defendants' above-described activities if Defendants are not preliminarily and permanently enjoined. Additionally, Defendants will continue to profit from their unlawful activities wrongfully.

34. Plaintiff is entitled to injunctive relief in accordance with 15 U.S.C. § 1116(a).

35. Plaintiff is entitled to recover damages as set forth in 15 U.S.C. § 1117(a).

36. Plaintiff is entitled to recover its attorneys' fees pursuant to 15 U.S.C. § 1117(a).

COUNT II
FALSE DESIGNATION OF ORIGIN PUSUANT TO 15 U.S.C. § 1125

37. Plaintiff realleges and incorporates by reference the allegations set forth above in paragraphs 1-24.

38. Plaintiff has used Plaintiff's Mark continuously and consistently for an extended period to identify, advertise, promote, and sell Plaintiff's Goods, which has indelibly impressed on

the minds of the consuming public the impression that Plaintiff's Mark identifies Plaintiff as the source of its women's fashion and apparel products.

39. Defendants have each caused or authorized the infringing use of Plaintiff's Mark in Defendants' advertisement and promotion of their infringing goods throughout the United States via the Internet.

40. The Defendants' products offered for sale and sold using Plaintiff's Mark are nearly identical in appearance to Plaintiff's genuine goods. However, upon receipt by consumers, the quality of the Defendants' products differs significantly. Therefore, by using Plaintiff's Mark on their products, the Defendants create a false designation of origin and a misleading representation regarding the origin and sponsorship of their products.

41. Defendants have each caused such goods to enter commerce in the United States with full knowledge of the falsity of such designations of origin and such descriptions and representations, all to Plaintiff's detriment.

42. Defendants' false designation of origin and misrepresentation of fact as to the origin and/or sponsorship of Defendants' Products to the general public involves the unauthorized use of Plaintiff's Mark and is a willful violation of Section 43 of the Lanham Act, 15 U.S.C. § 1125.

43. Plaintiff has no adequate remedy at law and, if Defendants' actions are not enjoined, Plaintiff will continue to suffer irreparable harm to its reputation and the goodwill of its brand and mark.

COUNT III
COMMON LAW TRADEMARK INFRINGEMENT

44. Plaintiff realleges and incorporates by reference the allegations set forth above in paragraphs 1-24.

45. Since at least as early as 2013, Plaintiff has continuously offered Plaintiff's Goods under Plaintiff's Mark. As such, Plaintiff has acquired common law trademark rights in and to the [REDACTED] mark.

46. Defendants adopted and began using Plaintiff's Mark after Plaintiff's first use of Plaintiff's Mark in the United States. Plaintiff's rights in Plaintiff's Mark are therefore senior to Defendants' rights, if any, in the wordmark [REDACTED], when used in connection with women's fashion and apparel products.

47. Defendants' conduct of promoting, advertising, offering for sale, and/or selling Defendants' Goods using Plaintiff's Mark constitutes common law trademark infringement.

48. Defendants' infringing activities are likely to cause and are causing confusion, mistake, and deception among consumers as to the origin and quality of Defendants' Products bearing Plaintiff's Mark.

49. Defendants' conduct is causing, and unless restrained by this Court, will continue to cause Plaintiff great and irreparable harm that cannot be fully compensated or measured in monetary terms. Plaintiff has no adequate remedy at law. Thus, Plaintiff is entitled to both a preliminary and permanent injunction to prohibit further infringement of Plaintiff's Mark.

COUNT IV
COMMON LAW UNFAIR COMPETITION

50. Plaintiff realleges and incorporates by reference the allegations set forth above in paragraphs 1-24.

51. Defendants are each promoting and otherwise advertising, selling, offering for sale, and distributing products using Plaintiff's Mark without authorization or the right to do so. Defendants are each also infringing on Plaintiff's Mark to unfairly compete with Plaintiff for (a) space in search engine results across an array of search terms and/or (b) visibility on the Internet.

52. Defendants' conduct constitutes unfair competition under the common law of Florida by a deliberate course of conduct, all without authorization, license, privilege, or justification.

53. Defendants' infringing activities are causing confusion, mistake, and deception among customers as to the origin and quality of Defendants' Products and Defendants' e-commerce stores as a whole due to their use of Plaintiff's Mark.

54. As a result of the Defendants' acts, Plaintiff has been damaged and will continue to be damaged in an amount not yet determined or ascertainable. At a minimum, however, Plaintiff is entitled to injunctive relief, an accounting of the Defendants' profits, actual damages, punitive damages, attorney's fees and costs, and any and all other relief authorized by law.

IV. PRAYER FOR RELIEF

WHEREFORE, based on the foregoing, Plaintiff prays for judgment on all Claims of this Complaint against Defendants as follows:

- 1) Finding that Defendants have directly infringed Plaintiff's Mark under 15 U.S.C. § 1125(a);
- 2) 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, employees, and all those acting in concert or participation therewith from:
 - a. using Plaintiff's Mark in connection with the distribution, marketing, advertising, offer for sale or sale of any product that is not a genuine Plaintiff product or is not authorized by Plaintiff to be sold in connection with Plaintiff's Mark;

- b. manufacturing or causing to be manufactured, importing, advertising or promoting, distributing, selling or offering of Defendant's Products;
 - c. using any logo, trade name or trademark or design that may be calculated to falsely advertise the goods of Defendants as being sponsored by, authorized by, approved by endorsed by, or in any way associated with Plaintiff;
 - d. from using Plaintiff's Mark, or any mark that imitates or is confusingly similar to or in any way similar to Plaintiff's Mark, or that is likely to cause confusion, mistake, deception, or public misunderstanding as to the origin of the parties' respective products or services or connectedness of the parties;
 - e. further infringing Plaintiff's Mark and further damaging Plaintiff's goodwill;
 - f. engaging in search engine optimization strategies by using Plaintiff's Mark; and
 - g. otherwise unfairly competing with Plaintiff.
- 3) 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 the Court's inherent authority that:
- a. enjoins Defendants and those with notice of the injunction, including, without limitation any online marketplace platforms (the "Third Party Providers") from participating in, including providing financial, technical, and advertising services or other support to Defendants in connection with the sale of Defendant's Products;
 - b. that, upon Plaintiff's request, the Third-Party Providers who have notice of the injunction cease hosting, facilitating access to, or providing any supporting service to all e-commerce stores for the Seller Aliases; and

- c. that, upon Plaintiff's request, the Third-Party Providers for the Seller Aliases who are provided with notice of an injunction issued by this Court, disclose the true identities and any contact information known to be associated with Defendants' Seller Aliases.
- 4) Directing Defendants to file with this Court and serve on Plaintiff's counsel within thirty (30) days after the service on Defendants of the injunction, a report in writing under oath setting forth in detail the manner and form in which Defendants have complied with the injunction;
- 5) Entry of an order requiring Defendants to account for and pay Plaintiff for all profits and damages resulting from Defendants' trademark infringing and unfairly competitive activities and that the award to Plaintiff be trebled, as provided for under 15 U.S.C. §1117;
- 6) Entry of an award pursuant to 15 U.S.C. § 1117 (a) and (b) of Plaintiff's costs and reasonable attorneys' fees and investigative fees associated with bringing this action as well as pre and post-judgment interest; and
- 7) Granting to Plaintiff such further relief as may be equitable and proper.

JURY TRIAL DEMANDED

Plaintiff demands a trial by jury on all issues so triable.

Dated: May 30, 2025

Respectfully submitted,

/s/ Joshua H. Sheskin

Joshua H. Sheskin (FL Bar No. 93028)

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Attorneys for Plaintiff

EXHIBIT 1
FILED
UNDER SEAL

EXHIBIT 2
FILED
UNDER SEAL

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

XYZ Corporation

Plaintiff(s)

v.

ABC Corporation 1 and ABC Corporation 2, Chinese Entities

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) ABC Corporation 1 and ABC Corporation 2, Chinese Entities

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Joshua H. Sheskin (FL Bar No. 93028)
Joshua@bayramoglu-legal.com
BAYRAMOGLU LAW OFFICES LLC
11540 W. Warm Springs Rd., Ste 100
Henderson, NV 89014
T: (702) 462-5973

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____ .

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

CIVIL COVER SHEET

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

I. (a) PLAINTIFFS

XYZ Corporation

DEFENDANTS

ABC Corporation 1 and ABC Corporation 2, Chinese Entities

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

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

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

(c) Attorneys (Firm Name, Address, and Telephone Number) Joshua H. Sheskin (FL Bar No. 93028) BAYRAMOGLU LAW OFFICE LLC 11540 W. Warm Springs Road, Suite 100 Henderson, NV 89014; (704) 462-5973

Attorneys (If Known)

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

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

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

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

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

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

Grid of categories: CONTRACT, TORTS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, REAL PROPERTY, CIVIL RIGHTS, PRISONER PETITIONS, INTELLECTUAL PROPERTY RIGHTS, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes sub-sections like PERSONAL INJURY, PERSONAL PROPERTY, HABEAS CORPUS, etc.

V. ORIGIN

(Place an "X" in One Box Only)

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

VI. RELATED/ RE-FILED CASE(S)

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

JUDGE:

DOCKET NUMBER:

VII. CAUSE OF ACTION 15 U.S.C. Section 840 - Trademark Infringement

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

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

VIII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ CHECK YES only if demanded in complaint:

JURY DEMAND: Yes No

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

DATE SIGNATURE OF ATTORNEY OF RECORD

May 30, 2025

/s/ Joshua H. Sheskin